MIGRATION, INTEGRATION, AND CITIZENSHIP IN WESTERN EUROPE: THE ROLE OF CIVIC INTEGRATION REQUIREMENTS IN THE NETHERLANDS AND GERMANY

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ABSTRACT

MIGRATION, INTEGRATION, AND CITIZENSHIP IN WESTERN EUROPE: THE ROLE OF CIVIC INTEGRATION REQUIREMENTS IN THE NETHERLANDS AND GERMANY

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This study analyzes civic-integration policies that have been introduced between 2000 and 2010 in Western-European states. These civic-integration policies introduced citizenship tests and interviews into the naturalization process of migrants by requiring knowledge of host society's language, history, law and institutions, and culture. Accordingly, in this thesis, these requirements are examined within the framework of liberal, republican, and communitarian citizenship theories looking whether these requirements comply with liberal norms and values. This study investigates two specific cases; the Netherlands and Germany. The Netherlands is one of the pioneer states to develop civic-oriented integration policies. It demands migrants to complete an integration test before they arrive at the Netherlands, and a citizenship test for naturalization. Similar civic-integration policies are adopted by Germany. It implements a civic-integration policy abroad and a naturalization test for those migrants who wish to be granted citizenship. These civic tests started a new era in the migrant

integration process. This thesis argues that the communitarian understanding of citizenship became more prominent while bringing a challenge for preserving liberal norms and values. Secondly, this research highlights that these civic-integration policies began to be perceived as hurdles against naturalization in terms of citizenship acquisition processes. Overall, the findings of this research concludes that this new era of civic-integrationism, in response to international migration, tests the limits of liberal democracies in the 21st century.

Keywords: Migration, Integration, Citizenship, the Netherlands, Germany

ÖZ

BATI AVRUPA'DA GÖÇ, ENTEGRASYON, VE VATANDAŞLIK: KAMUSAL UYUM POLİTİKALARININ HOLLANDA VE ALMANYA ÜZERİNDEKİ ROLÜ

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Bu tez, Batı Avrupa'da 2000 ve 2010 yılları arasında uygulanmaya başlanan kamusal uyum politikalarını incelemektedir. Bu kamusal uyum politikaları, vatandaşlığa kabul sürecine vatandaşlık testleri ve mülakatları getirerek göçmenlerden ev sahibi toplumun dilini, tarihini, hukuk sistemini, kurumlarını ve kültürünü bilmelerini gerekli kılmışlardır. Bu tezde bu politikalar, liberal, cumhuriyetçi ve toplulukçu vatandaşlık teorileri çerçevesinde incelenerek, liberal norm ve değerler ile bu politikaların uyumlu olup olmadıklarına bakılmaktadır. Bu çalışma iki ayrı ancak ilişkili vakayı incelemektedir; Hollanda ve Almanya. Hollanda vatandaşlık odaklı uyum politikalarını geliştiren öncü ülkelerden biridir. Göçmenlerden Hollanda'ya gelmeden önce uyum testini tamamlamaları istenirken, vatandaşlık tanınması için de vatandaşlık testini geçmeleri istenmektedir. Benzer kamusal uyum politikaları Almanya tarafından da kabul edilmiştir. Yurt dışındaki göçmenlerden için dil yeterliliği istenirken, vatandaşlığa geçmek isteyen göçmenler için de vatandaşlık testi

uygulanmaktadır. Bu testler göçmenlerin uyum süreci açısından Batı Avrupa'da yeni bir dönemi başlatmışlardır. Bu tezin bulguları bu yeni dönemle ilişkili iki önemli konunun altını çizmektedir. İlk olarak, ortak kültür ve ortak kimliğe önem veren toplulukçu vatandaşlık anlayışı liberal normların ve değerlerin korunmasını sorgulatarak önem kazanmıştır. İkinci olarak, bu politikaların vatandaşlığa geçiş süreçleri karşısında engel oluşturdukları algısı ortaya çıkmıştır. Bu tez, kamusal uyum politikalarıyla başlayan bu yeni dönemin, uluslararası göçe verilen bir cevap olduğunu ve Batı Avrupa'daki liberal demokrasilerin sınırlarını test ettiğini açıklamaya çalışmaktadır.

Anahtar Kelimeler: Göç, Uyum, Vatandaşlık, Hollanda, Almanya

To my mother Semra, my father Mehmet, and my brother Berk

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LIST OF ABBREVIATIONS

CBPs	Common Basic Principles
CDU	Christian Democratic Union
CIVIX	Civic Integration Requirements Index
CSU	Christian Social Union
CPI	Citizenship Policy Index
EU	European Union
Immigration Act	Regulation of Residence and Integration of Union Citizens and Immigrants
MIPEX	Migrant Integration Policy Index
SPD	Social Democrats
TCNs	Third Country Nationals
WWI	World War I
WWII	World War II
BAMF	Federal Office for Migration and Refugees

CHAPTER 1

INTRODUCTION

Immigration has brought considerable changes to conceptions of membership and belonging in the nation-states of Europe. Legal terms of membership and the identification of belonging have been transformed in the post-World War II (WWII) era while migration, integration, and citizenship policies became highly interlinked. Relevantly, nation-states have started to develop domestic policies to manage and regulate migration; which include formulating integration policies. Integration is crucial for citizenship policies because only after a process of integrative measures specified by the institutions, migrants can be naturalized and become citizens. Taking this into consideration, certain traditional integration models have been developed as such; French assimilationist model, Dutch multicultural model, and German segregationist model. Accordingly, these models either developed inclusionary or exclusionary principles of citizenship based on blood which is *jus sanguinis*, or soil which is *jus soli.*

In the aftermath of WWII, these models started to be challenged with several migration patterns in Europe. The labor migration movements that started with bilateral agreements by the 1960s were followed by family reunifications after the 1970s, and asylum applications throughout the 1980s and the 1990s. These movements started to challenge the acknowledged traditional integration models. This research states the idea that these standardized models of integration and citizenship are not static but subject to change. Although they preserve their value in policy regulation, public opinion, political behavior, etc., the naturalization process of migrants are adapted to internal and external influences

and started to show changes. In other words, a multiculturalist Dutch model or a segregationist German model can no longer be taken as granted to examine the present and future implications of migration. In order to understand and explain this change, the civic integration policies that were first introduced by the Netherlands and later accepted and adjusted by other Western-European nation-states such as Germany, the United Kingdom (UK), France, Austria, Denmark, and Luxembourg can provide a more comprehensive explanation. The scope of this research is limited to Western-Europe is because Southern-Europe did not follow a liberalization trend of citizenship policies in the 1990s; therefore the restrictiveness and the end of liberalization in the 2000s cannot be examined on these states (Joppke, 2008, p. 6). Thus, although this analysis could also be made within an EU Framework, Southern-European member states would be excluded because of their diverse experience with irregular migration as transit countries, late reformation processes, and economic inefficiencies compared to the Western-Europe (Cornelius & Hollifield, 2004).[1] Therefore, the terminology of the Western-Europe is used for encompassing a region instead of the EU.

Civic-integrationism is the restrictive change in integration policies bringing certain requirements that primarily consist of language skills and knowledge of that particular society. Knowledge of society includes the history, geography, law and institutions, and culture of that particular state. These requirements are required through a citizenship test that includes both an integration test and language qualification exam. The tests can be conducted in the form of an interview, through a written test, or both. These requirements are prerequisites of citizenship acquisition and have both normative and empirical impacts on migrant integration. In this thesis, the normative aspect of civic measures is firstly associated with three citizenship theories of liberal, republican, and communitarian citizenship and their interpretation of civic-oriented policies. Secondly, these measures are discussed whether they are compatible with universal norms and values that are acknowledged by liberal democratic states.

[1] For more detailed information see "Latecomers to Immigration: Italy, Spain, Japan, and Korea" in (Cornelius & Hollifield, 2004).

The empirical study on the impacts of these civic-oriented requirements is used to see if the restrictiveness acted as an obstacle towards citizenship acquisition or not.

Overall, this civic turn is observed in most of the Western-European states like the Netherlands, Germany, France, the UK, Austria, Luxembourg, and Denmark regardless of historical differences in their integration and citizenship understandings. In this sense, there was a convergence in the citizenship and integration theories in terms of civic-integration requirements among several Western-European states. What makes the civic-integrationism particularly significant is that all these Western-European states that had different integration traditions started to imply similar policy patterns for migrants. Thus, this thesis emphasizes on the similar policy practices, namely the civic integration requirements that gained importance starting with the 2000s in different nation-states. The aim is to analyze the reasons, objectives, and outcomes of this civic turn by looking at past and present implications of migration. The timeframe determined for this thesis covers the years between 2000 and 2010 because of the availability of primary and secondary sources in this period. Most of the academic literature considers this particular decade as an effective period to analyze the civic-turn. Thus, although the civic policies continue to be practiced in post-2010, only the transformation from liberal policies to more restrictive ones by late 1990s to late 2000s will be analyzed within the scope of this research.

This thesis is divided into three main chapters. First of all, the development of the notion of citizenship in the literature will be explained in Chapter 2. Citizenship has been defined through the identification of various foundational principles, histories, and forms in the literature. Main theories of citizenship are presented by liberal, republican, and communitarian approaches. Liberal citizenship theory accepts the minimalist understanding of citizenship as a legal status, republican theory defends active citizenry together with political participation, and communitarian theory is a supporter of the common good

which requires a common identity. According to these three citizenship theories, states develop different naturalization policies. Therefore, processes of integration, naturalization, and citizenship are mutually dependent to each other. Accordingly, the policy change and civic-oriented citizenship tests in different states will be interpreted by touching upon basic premises of these citizenship theories throughout the thesis.

Consequently, the significance of the citizenship status necessitates the constant re-consideration of the interplay between migration, integration and citizenship policies. This link between three areas will be explained within a conceptual framework starting with Chapter 3. The chapter will reveal an overview of traditional integration models starting with colonial movements, democratization processes, and political unifications. For instance, the well-known examples of French assimilationist model, British and Dutch multicultural model, and German segregationist model are among those that will be explained briefly in this chapter. Later, the interplay between these three areas will be interpreted within a historical-institutionalist framework. The first era is the policy liberalization starting with the 1980s and late 1990s. It is the end of Cold War in which barriers for migration were eliminated to a certain extent and the human mobility increased considerably with the fall of Berlin Wall. Relevantly, the human rights discourse has developed and expanded across Europe. These developments were important in the sense that they represented the idea of a multicultural Europe while certain scholars emphasized the potential of post-nationalism and decline of nation-states (Kymlicka, 1995; Soysal, 1994; Sassen, 2002). This era marked the liberalization of certain citizenship policies, for instance, the 2000 citizenship liberalization in Germany which allowed children of migrants the right to citizenship on the condition that they were born in Germany.

After a preliminary understanding of the road Western-Europe took on the way to integrating migrants into the society and granting the right to citizenship, Chapter 3 will continue with a new era starting with the 2000s. This period is

mentioned as the “restrictive backlash from liberalism” and “the civic turn” in the literature for several reasons. First of all, high level of unemployment and relying on social-assistance systems among migrants has become a burden on national economies. Secondly and more importantly, security concerns had increased after the 9/11 attacks, and terrorism began to perceived as a common threat. The bombings in London and Madrid, the murder of the politician Pim Fortuyn and the director Theo Van Gogh in the Netherlands resulted in the perception that migrant integration had failed. Moreover, the rise of right-wing political parties and the political discourse on Islam’s incompatibility with Western values resulted in the change of perception against migrants in Western liberal democracies. This new perspective gave birth to civic-integration policies that were never practiced before. Previous integration models were primarily based on birth-right citizenship or favored descent-based citizenship. Starting with the 2000s, meeting the residency requirement had become inadequate for a claim to citizenship. Traditional integration models started to lose their significance in leading towards citizenship. Relevantly, a consensus on concerns had been reached and traditionally different states started to adopt similar integration policies in order to preserve themselves from common illiberal threats. In a sense, integration has become a tool of immigration policy to keep illiberal migrants, those who are considered as incompatible with Western values, out of citizenship status through integration tests. These tests have become prerequisites for obtaining both temporary and permanent residence permits. Thus, they had an impact on access to entry and residence (Goodman S. W., 2014, p. 164)

Accordingly, several Western-European nation-states have introduced citizenship tests regardless of their previous liberalization processes. Most prominent examples of this new turn are the *Life in the UK Test* in the United Kingdom, *The Integration from Abroad Act* in the Netherlands, and tests in federal states of *Baden-Württemberg and Hesse* in Germany (Orgad, 2010; Michalowski, 2011; Van Oers, 2013; Kostakopoulou, 2010). Moreover, other Western-European states such as Luxembourg, Denmark, Austria, Sweden, and Switzerland have also tightened their naturalization policies. It suggests the idea

that many Western-European states started to respond the age of migration with restrictive civic policies by the 2000s. These policies yield to normative discussions and reveal empirical results. In normative terms, these policies challenge the very structure of liberal-democracies when states try to preserve liberal values through legitimate yet illiberal means; it is called as "liberal-paradox" (Orgad, 2010). Empirically speaking, states acquired certain scores and considered either liberal or restrictive in accordance with their civic-policies. Therefore, Chapter 3 introduces the civic-turn by referring to cross-national examples from Western-Europe and discusses the policy change in normative and empirical terms. The next chapter and its findings will be in compliance with these debates on the civic-turn.

Following this, the discussion will be carried out with two particular case studies; the Netherlands, and Germany in Chapter 4. These states had historically different integration models, a multicultural Dutch model, and a segregationist German model, whereas they both started to apply similar civic integration policies starting with the 2000s. The Netherlands has become the first to practice socio-cultural integration requirements towards migrants in 1998. Following this, it currently holds one of the strictest integration policy in which migrants are subject to fulfill certain requirements of an integration test even before arriving the Netherlands. Historic incidents like the murder of the politician Pim Fortuyn in 2002 and the director Theo Van Gogh in 2004 have paved the way for further security concerns and the rise of anti-immigrant sentiments. Consequently, the Netherlands introduced civic-integration requirements. Overall, this chapter will first illustrate the periodical policy change in the Netherlands with a historical overview of its migration, integration, and citizenship policies. Later, the civic-turn and the policy change between 2000 and 2010 will be briefly explained within the context of citizenship tests.

Chapter 4 will continue with the second case study: Germany. Germany has historical differences compared to the Dutch case; it was known with its ethnic-oriented citizenship policy. Despite its differentialist citizenship

understanding, the experience with the guest-worker system and receiving labor-migrants starting with the 1960s eventually urged Germany for citizenship policy liberalization in 2000. However, in spite of this liberalization attempt, citizenship policy has remained considerably restrictive together with the 2004 Immigration Law and the ongoing dual citizenship debates (Howard, 2012; Goodman & Howard, 2013; Hansen, 2009). Furthermore, citizenship tests in states of *Baden-Württemberg* and *Hesse* are found strictly restrictive and the liberalization process ceased to exist. Although Germany is a federal state, each federal state (Länder)[2] has the competence to apply its own naturalization policy unless a federal policy is enacted. In that case, Länder has to follow the federal policies; they are binding. For instance; the 2008 Federal Naturalization Test replaced the tests in federal states (Van Oers, 2013).

After setting the scene for two different states that practice similar civic integration requirements, a comparative discussion will be made between these two in Chapter 5. In accordance with the discussion in Chapter 3, the discussion will be based on normative debates and empirical results. The content of civic-integration requirements will be first discussed to see which citizenship policy, liberal, republican, and communitarian can explain them better. Also, the scope and the content of the citizenship tests will be examined to a certain extent to decide if they comply with liberal norms and values with reference to the debate on "illiberal liberalism". Later, the numbers of total naturalizations will be analyzed for both states to see whether civic-policies acted as barriers for naturalization. If that was the case and the number of naturalized migrants decreased after the civic policy entered into the force, the chapter will also try to find out which migrant communities were affected by these policies at most. As a result, Chapter 5 offers a discussion for these two countries by touching upon normative and empirical debates in previous chapters. The findings will be presented at the end of this chapter to demonstrate which country used a liberal, republican, or a communitarian citizenship theory in terms of the content of civic

[2] The sum of each federal state is referred as "Länder" in German. This terminology will be used throughout the thesis instead of using "federal states".

policies and whether these can be considered “liberal”. The findings will also interpret empirical results by determining which country was affected most from the civic policies in terms of policy outcomes in numbers.

In terms of objectives, there are certain areas where this thesis aims to make a contribution. Primarily, it is asserted that the existing literature on immigration and citizenship provides a much stronger basis of theoretical reasons for liberalization than for restrictiveness (Howard, 2006). Furthermore, scholars have developed two different ways of interpreting citizenship tests and other integration requirements for immigrants so far; either as a hurdle to naturalization or as an attempt for cultural assimilation. However, there is not a systematic analysis of the content of citizenship tests that allows for more precise interpretations of the objectives pursued by this policy change (Michalowski, 2011). Thus, this study will try to come up with an analysis to explain the reasons, objectives, content, and outcomes and future implications of the restrictiveness of the new civic integration. The aim is to discuss this restrictive civic-turn and the extent to which it can be explained within the framework of citizenship theories and liberal norms and values. To put it differently, this thesis aims to present changing perspectives on citizenship theories from the point of view of naturalization process of migrants.

As a result of the discussion above, this research seeks to explore normative and empirical discussions on civic-integration policies in the Netherlands and Germany, aiming to clarify the restrictive turn in both cases where there is already a great deal of research in the literature between 2000 and 2010. The purpose is to interpret civic-integrationism from the citizenship perspective. Therefore, the scope of this thesis does not include presenting cross-national comparisons or a systematic analysis of the content of tests. Rather, it tries to understand why citizenship acquisition has become a more complex phenomenon and in what ways. Therefore, this thesis re-considers the relationship between migration, integration, and citizenship policies through civic-integration requirements.

Although there are various examples of cross-national comparisons in the academic literature on the convergence thesis, further research is needed to meet future challenges within this field. The increasing number of migrants and refugees, the outcome of Brexit, the US election of 2016, and the rise of far-right, widespread xenophobia, and Islamophobia necessitate the study of policy objectives for future challenges in the field of migration. The findings of the era between 2000 and 2010 would stand as examples for the forthcoming integration processes that will be faced both by host societies and migrants in the future. Integration is a continuous challenge as long as human mobility continues; it is not static and open to change.

This research has also certain limitations; the normative discussion of citizenship and integration tests in the Netherlands and Germany in Chapter 5 are based on secondary sources. The questions in these tests that were introduced between 2000 and 2010 are not completely publicly available and the available ones are mostly in their original language. For this reason, the questions that were already accessed, translated, and analyzed by certain scholars are taken as samples for analysis. Therefore, this thesis tries to discuss certain selected controversial questions from the perspective of three citizenship theories that are discussed in Chapter 2 and liberal principles that are discussed in Chapter 3. Although the numbers of the questions that are accessed and considered in this thesis are limited, the scope and extent of the analysis makes it adequate to make a connection with previous theoretical and conceptual discussions within the scope of this research. Overall, the aim is to present the academic literature and the main discussions on these tests by using secondary resources, and then interpret selected questions in an argumentative way within the scope of three citizenship theories.

Lastly, the discussions on empirical impacts of civic-integration policies in Chapter 5 only take the naturalization numbers, the number of applications, and pass rates of citizenship tests into consideration while looking at the impact of civic-integration policies. However, there might be other factors such as

economic burdens or the dual citizenship debate, affecting the decrease in numbers, which are not within the scope of this thesis although they will be briefly mentioned. Therefore, the aim is to take the civic-turn as one possible indicator that complies with the decrease in naturalization numbers and pass rates.

As for methodological design for this thesis, Germany and the Netherlands are chosen as case studies to be studied comparatively. Accordingly, both countries are members of the European Union, experienced labor migration in the post-war era, established a "guest-worker" system and have been implementing integration policies towards a large amount of Muslim minorities. Most importantly, both states started to practice civic integration requirements within the same time era so it allows a comparison between two. The restrictiveness of a policy is best studied with two similar states that are both considered to have restrictive integration models within the same time frame. Furthermore, the Dutch Civic Integration model is stated to be followed by Germany as a role model throughout the literature (Joppke, 2007c; Orgad, 2010; Carrera, Groenendijk, & Guild, 2013; Van Oers, 2013).

Also, although several other Western-European states have also started to follow the Dutch trend, the time range does not allow comparison. For instance; France introduced a test on history and culture by law in 2011 and a language diploma requirement in 2012 (Van Oers, 2013); therefore it did not have a citizenship test between 2000 and 2010 (Michalowski, 2009, p. 11). However, Germany and the Netherlands started to practice these policies in the same era, end of the 1990s beginning of the 2000s, which allows empirical research to examine policy outcomes in a comparable way. This similarity between them becomes more interesting considering the fact that these two states historically represented different integration models. Thus, the Netherlands and Germany are among applicable cases for the assessment of civic-integration policies.

As the collection of data for these countries, citizenship and migration laws and policies of countries are collected from official and scholarly sources,

mainly from secondary sources. Also, European Union Democracy Observatory on Citizenship (EUDO)[3] offers a wide range of databases to access primary sources of National Citizenship Laws and Global Database on Modes of Acquisition of Citizenship in which countries can be selected. These databases are used to acquire information on different legal arrangements, institution structures, and policy-making processes.

In order to compare, conceptualize, and measure citizenship and integration policies, results of the works conducted with certain indices are used in Chapter 3. First of all, the Citizenship Policy Index (CPI)[4] of Marc Howard (2006, 2010) are used to see the changing scores of Western-European states throughout the 1980s and the 1990s in their citizenship policies. Later, the results of Civic Integration Index (CIVIX)[5] of Sara Goodman (2010, 2012b) are used in order to particularly consider the recent role of civic integration requirements starting with the 2000s. CIVIX is an index that measures language, country-knowledge, and value commitment requirements. Lastly, the Migrant Integration Policy Index (MIPEX)[6] and the area of 'access to nationality' will be used for the purpose of this research. MIPEX provides general information and data on four dimensions; eligibility, conditions for acquisition, security of status, and dual nationality. Thus, CIVIX provides the specific data of the change on civic integration requirements and MIPEX is used to support the interpretation of CIVIX results.

Therefore, primary and secondary official and scholarly sources with the data retrieved from secondary sources of different indices are used to combine

[3] See (EUDO Citizenship, 2009).

[4] See (Howard, 2006) and (Howard, 2010).

[5] See (Goodman, 2009), (Goodman S. W., 2010), (Goodman S. W., 2012b), (Goodman S. W., 2015).

[6] See (Migrant Integration Policy Index, 2010).

theoretical and empirical findings of developments in citizenship policies in two case studies: the Netherlands and Germany.

Overall, this thesis argues that in terms of objectives of these requirements, they reflect republican citizenship theory with their emphasis on duties, obligations, and active citizenry. Accordingly, citizenship tests, as tools of civic-integration policies, are influenced by the communitarian citizenship theory and emphasize on shared norms, values, history, and culture. These tests reflect the common identity of a particular state in a communitarian sense. These republican and communitarian influence on citizenship policy acts as a burden towards citizenship acquisition to a certain extent by preventing the access to permanent residency in both states. Due to the fact that these tests are prerequisites of naturalization, failing to pass these tests results in the deprivation of citizenship status. Therefore, civic integration requirements that have started with the 2000s hold an important place in the literature since they challenge the liberal image of Western-democracies.

CHAPTER 2

CITIZENSHIP THEORIES AND NATURALIZATION

It is not feasible to find a single definition of citizenship but it can be accepted as the legal relation between an individual and a particular state. The debate on citizenship still highly matters since it can be practiced as a territorial boundary in the 21st century; separating citizens from foreigners or members from non-members. Also, it is argued that citizenship preserves its value in terms of migration because naturalized citizens tend to be integrated into the society more than those who remain non-citizens (Howard, 2006, p. 445). Hence, if full integration into society is a necessity, citizenship is the most efficient motivation. Although different meanings can be attributed to the notion of citizenship, this research is interested in the "access to citizenship" for migrants. For this reason, different theories of citizenship are crucial in terms of their arguments whether they favor rights, political norms, cultural values, or identity for granting the right to citizenship. These theories determine the way integration policies are developed in a state because they define the boundaries of how a citizen should be. For this purpose, a theoretical discussion will be made on different theories of citizenship.

In the literature, this modern view of citizenship is reflected on three main concepts; citizenship as a legal status, citizenship as an activity (mainly political), and citizenship as an identity (Bauböck, 1999; Kymlicka & Norman, 1994). Respectively, it can also be divided as such; what you get, what you owe, and what you feel (Kostakopoulou, 2003). Citizenship as a legal status refers to the legal position of an individual and the specific link between a person and a particular state. As a result of this legal status, the citizen can enjoy certain civil,

political, and social rights attached to it, together with duties and obligations. Citizenship as an activity is related to active citizenry and participation in political, social, and economic spheres but puts political participation forward among all. Lastly, citizenship as identity concerns with the common culture, history, and traditions of a particular society. In other words, the identity is associated with how citizens identify themselves within a society, their common loyalty and commitments towards mutual values. These three concepts are represented with three theories; liberal, republican, and communitarian.

2.1. Liberal Citizenship Theory

Liberal political theory, in general, refers to the acceptance of freedom and equality of all individuals within a state. Liberal citizenship provides a legal status with certain rights and duties attached to it which are formal and universal at the same time. (Honohan, 2017, p. 2) Although it sees electoral representation as an important element of citizenship, active participation is not an essential part of it (Honohan, 2017, p. 5). Rather, legal rights are prioritized instead of the participatory aspect of citizenship.

T. H. Marshall (1950) makes a contribution to the right-based perspective of liberal citizenship policy. Within a historical framework, he classifies a group of rights as follows: civil, political, and social. Accordingly, civil rights such as liberty of person, freedom of speech, thought and faith and the right to justice came first in the 18th century. These rights were considered to have a universal character due to their link with individual freedom. Later, political rights that refer to representative democracy followed them and their spread was one of the main developments in the 19th century. Finally, social rights were the last to emerge starting with the public elementary education, healthcare, unemployment insurance, etc. in the 20th century (Marshall, 1950). He argues that the aftermath of the WWII had an impact on the development of these social rights in a time of social and economic insecurity and instability.

In addition, Marshall sees the social right to education as a prerequisite for civil freedom, thus considers social rights as the basic elements of a universal citizenship. In other words, social rights are representatives of living as a civilized being. Relevantly, Marshall argues that class distinction would be eliminated as social rights develop since it would provide each individual a medium of equality prevailing in entire society and an opportunity in terms of choosing the life of its own (Marshall, 1950). For this reason, this sort of citizenship would have a universal character as long as one holds the citizenship of that state. This would also mean that the citizenship concept Marshall defines is internally inclusive for citizens and externally exclusive for those who are non-citizens. Thus, Marshall's view on social citizenship and its universal understanding do not encompass migrants, refugees, or asylum seekers. He perceives the society as a homogenous entity by overlooking racial, ethnic, cultural, and religious differences (Turner, 2009). One can have no civil, political, and social rights unless he/she holds the status. Therefore, Marshall's contribution with a right-based approach lacks to encompass third-country nationals (TCNs) who constitute a large amount of population not only in the UK but in entire Europe.

Overall, Marshall argues that the market-society relations including class inequalities and inadequate access to employment, education, social security, state benefits, etc. resulted in the formulation of a new citizenship regime. This universal social citizenship is crucial for the literature starting with the post-WWII era since it introduces the first liberal understanding of citizenship. It expands the scope of citizenship for those who hold the citizenship status and rights are distributed equally among them. All in all, this view is considered as a "passive" understanding of citizenship (Kymlicka & Norman, 1994, p. 354). It only provides a minimalistic understanding of rights such as; education, security, and health but puts no emphasis on obligations.

Another significant contribution regarding the liberal citizenship theory is made by John Rawls. According to him, the position of equal citizenship is determined by rights and liberties. Everyone is an equal citizen when two

principles are satisfied in a society; the principle of equal liberty and the principle of fair equality of opportunity (Rawls, 1971, p. 82). In other words, citizens are equal when they are provided with freedom on an equal basis. Moreover, Rawls asserts that primary goods such as; liberty, opportunity, income, and wealth should be distributed equally among all members of the society (Rawls, 1971, p. 303). Although this enhances a universal idea of citizenship, the idea of public-spiritedness, civic activity, and political participation are stranger ideas for the liberal theory of citizenship (Mouffe, 1993, p. 72). It is stated that there should not be strict political obligations for citizens in general under liberal theory (Rawls, 1971, p. 98). Instead, obligations should be based on voluntary acts (Rawls, 1971, p. 99). What primarily matters for liberals is to have rights as Hannah Arendt puts it: "We became aware of the existence of a right to have rights (and that means to line in a framework when one is judged by one's actions and opinions) and a right to belong to some kind of organized community" (Arendt, 1966, pp. 296,297). Thus, as long as the principles of equality and justice are maintained in a society under the status of citizenship, citizens can prefer to voluntarily participate in obligations.

Both T.H. Marshall's and John Rawls' interpretation of citizenship and rights encompass only those who hold the status of citizenship. However, Rawlsian understanding of liberal citizenship is relatively more universal since it appeals to applicants who wish to become citizens as well. The equality and justice Rawls refers to are crucial for political rights since only citizens can enjoy them. Thus, citizenship enables them with equal opportunity of representation. However, migrants in the territory can enjoy comprehensive rights that are attached to residence or employment rather than the status of citizenship itself. This practice is associated with the term "denizenship" (Hammar, 1990) in which migrants hold legal rights except political rights; right to vote and political representation in particular. Thus, the thinnest understanding of legal rights can now be enjoyed without acquiring citizenship.

All in all, it can be seen that there is not any emphasis on active participation in the liberal citizenship theory; it is optional. Instead, liberal citizenship puts representation forward in a way that democracy is institutionalized through decision-making of diverse interests. (Honohan, 2017, p.10) Representation is a demonstration of how diverse interests are taken into consideration as the principle of equality and justice suggest; each citizen should be represented on equal terms. That does not put any mandatory obligation on citizens; therefore liberal citizenship, commonly, is the passive understanding of citizenship that emphasizes on the equal and fair distribution of rights. The applicants who wish to become citizens are only required to comply with laws which regulate rights and freedoms in return.

2.2. Republican Citizenship Theory

Republican citizenship theory accepts the values of freedom and equality as the liberal theory does but believes in the idea that individuals cannot reach these values alone. Thus, it defines freedom as the active participation in the decision-making process, self-government, civic engagement, and the concern for the common good. (Honohan, 2017, p. 2) In this sense, one's liberty is only guaranteed as long as one willingly and actively participates in the political community to protect that liberty. In other words; citizens are only free when they decide upon the way they are governed through participation. Contrary to the liberal understanding of individual interests, the common good above private interest is a condition for preserving liberty and equality; it requires the citizen's effort in order not to lose it (Mouffe, 1993, p. 73). Thus, it is argued that republicanism offers citizens the opportunity of self-government through which they can enjoy common goods (Honohan, 2017, p. 6). By this way, republicanism accepts the significance of liberty, equality, justice, fairness that brings a medium of equality which must be protected by law as in the case of liberalism. However, it is the active understanding of citizenship that can preserve and protect these

values; it requires active commitment and demonstration of civic virtues from citizens.

The sum of the values can be referred as the “common good”. It is not easy to draw boundaries for the term “common good” since it is open to interpretation. However, since the scope of this thesis includes liberal democracies, common goods are taken as universally accepted norms and values. For instance; freedom of opinion, freedom of speech, all fundamental rights including human-rights, etc. should be considered as common goods. They are not natural properties that can be taken for granted but realized and protected by legal and political institutions. Common goods are collectively shared and enjoyed by all citizens including the democracy and the rule of law.

As it is seen, the republican citizenship is more demanding compared to the liberal citizenship; it demands communication, an awareness of responsibility to the society as a whole, and capability to engage with other citizens in public debates (Honohan, 2010, p. 91). More importantly, republicans believe in the idea that citizens are not born but are made (Honohan, 2010, p. 94). This is the strongest claim of the republican idea of citizenship; citizenship should not be taken for granted, it is constructed through awareness, knowledge, skills, and activities and so on. It is citizen’s own effort and responsibility that makes him/her a citizen.

Thus, both liberalism and republicanism share the same values of freedom and equality, whereas the way they interpret and prioritize them differs (Honohan, 2017, p. 3). Their arguments are not contrary to each other but republicanism complements what is lacking in a liberal understanding. It is argued that if liberal citizenship is a “market” in which individual interests are performed; republican citizenship is a “forum” in which views are expressed in public (Honohan, 2017, p. 11). The most distinct feature of the republican idea of citizenship is, therefore, its commitment to the active citizenry, civic engagement and political participation in the public sphere. For this reason, republican citizenship theory would not be satisfied with equal representation but seek

citizens to actively play a part in the political participation process. This active effort would ensure their equal representation. Thus, it would require applicants for citizenship acquisition to be able and willing to actively participate to earn citizenship.

2.3. Communitarian Citizenship Theory

Throughout the literature, communitarian citizenship and republican citizenship are sometimes considered together as the first follows the latter. In other cases, it might be referred as "civic republicanism". Therefore, it should be kept in mind that communitarianism is not something completely different than republicanism but a one-step-ahead version of it (Mouffe, 1993). The civic republicanism uses active participation for the sake of political community as a whole, and the term "communitarian" can be used interchangeably to explain this aspect. However, in order to understand the distinct essence of communitarian thinking, it will also be examined separately from republicanism.

To start with, communitarianism brings a criticism to the liberal understanding of citizenship, stating that a civic republican approach is a necessity to emphasize the public good instead of relying on liberal citizenship's independent individual interests, aims, and desires (Mouffe, 1993, p. 71). In a sense, liberal citizenship is seen as a selfish approach that does not emphasize on collective needs and interests of the public. Contrary to this, communitarian citizenship requires awareness for the consideration of the interest of the community. Moreover, communitarians are supporters of a common identity. This common identity dimension gives communitarian citizenship a legitimate reason to exclude non-citizens (Honohan, 2017, p. 20). The exclusion would depend on how common identity is defined; whether on a cultural basis or on liberal-universal norms.

The common identity is controversial and can be defined as a shared common culture as well. Communitarians argue that a civic citizenship as in the republican understanding is illusory when it does not require a common culture

because a political community would always include some sort of cultural entity (Honohan, 2010, p. 99). It is people with cultural backgrounds that make up the community after all as communitarianism suggests. The identity can never be solely composed of universal liberal norms and values. However, one should pay attention to which cultural values will be given priority. Already existing cultural norms and values cannot be excluded but space should be given to those that emerge as a result of interaction. In other words, culture is subject to change as well, it is neither constant nor static. If communitarianism insists on a shared sense of culture and/or identity, these should encompass new values and norms brought by new members of society through social and political interaction. A shared culture and identity are subject to constant re-construction. Thus, communitarian citizenship adds a second dimension on liberal citizenship and republican citizenship and demands contribution to a common identity.

Table 1. Three Theories of Citizenship

DIMENSIONS	**THEORIES** **thin** ⟷ **thick**		
	Liberalism	**Republicanism**	**Communitarianism**
Membership	Legal status	Political identity	Cultural identity
Rights	Negative liberties	Obligations	Moral duties
Practices	Passive Citizenship	Civic virtues	Heroic virtues

Source: (Bauböck, 1999, p. 4)

This table summarizes the basic premises of liberal, republican and communitarian citizenship that are discussed above. First of all, Bauböck divides the conceptions of citizenship into two; thin and thick conceptions. “Thin” conception illustrates the minimalist understanding of citizenship that does not entail many duties and obligations from the citizen. As it gets “thicker”, citizenship begins to demand more from a citizen in terms of obligations, duties, and virtues. Accordingly, while liberalism is the thinnest conception of

citizenship, republicanism stays in the middle, and communitarianism is the thickest. (Bauböck, 1999, p.4) For each theory, there are three dimensions; membership, rights, and practices. It is stated that these three dimensions can be interpreted for all three conceptions, rather than attributing one dimension to one citizenship theory.

According to Table 1, liberalism is relatively easy to understand since it is the thinnest understanding of a legal status providing basic liberties. Negative rights stand for rights automatically given to citizens with the status acquisition and this creates a passive citizenship understanding since citizens are not obligated to actively participate and practice these rights. Republicanism and communitarianism, on the other hand, are more complex. For republicans, rights entail obligations and practices entail civic virtues. These practices such as; public education, political participation, and resistance against oppression are crucial for a self-governing polity. They are considered as moral duties of citizens and require active civic engagement and participation. Thus, republicanism aims to maintain a balance between rights and obligations (Bauböck, 1999, p. 7). For that reason, it is thicker than liberal citizenship.

Communitarianism adds a second dimension to republicanism by its emphasis on the cultural identity. Rights and practices are seen as moral duties and heroic virtues respectively, meaning that the contribution to cultural identity is prioritized before individual interests. However, it is argued that if membership to a polity is determined by cultural belonging or identity, this would create a tension with the diversity brought by migration. It is argued that communitarian citizenship cannot be fully inclusive in liberal democracies that experienced transnational migration (Bauböck, 1999, p. 13). A recommendation that can be made for this issue is to naturalize these migrants while making sure they share the same norms and values of the polity in order to extend the right of citizenship. The important point here is to decide upon those shared norms and values that would determine the naturalization process.

As a result, all three theories of citizenship agree on basic premises of liberal citizenship as having the legal status and rights attached to it, whereas they all interpret it differently. Liberals are satisfied with the medium of equality and justice secured by the laws and institutions and citizens are set free to follow their individual pursuits. Republicans require civic engagement and active participation in order to preserve liberties and to contribute to the common good. Citizens can hold their own sub-cultures and traditions but they have to be actively involved in the decision-making process. Lastly, communitarians open up the most controversial dimension of citizenship studies; common identity. This theory of citizenship requires a shared sense of identity for the benefit of the common good. Defining such identity remains vague and open-ended, whereas it can be agreed that communitarianism would not allow citizens to keep their different cultures which would contradict to the dominant culture of the society. Thus, communitarianism builds up from the liberal idea of equality and justice, and the republican idea of participation and contribution to the common good but adds another controversial dimension of common identity. It is open to discussion to determine what really constitutes a common identity; norms, values, history, culture, traditions, etc. In accordance with the way common identity is defined in a state, migrants would be subject to different requirements to acquire citizenship. Therefore, common identity differs from the common good because the former includes cultural aspects and the latter expects a commitment to the common interests of a community. However, there is not a clear line between two.

Similar to the discussion on the common identity, it is stated that a modern democratic political state cannot emphasize a single idea of a common good as opposed to the idea of communitarian and republican citizenship because the individual liberty would be sacrificed in that case (Mouffe, 1993, p. 72). The common good should encompass several political principles instead of cultural ones such as; equality and freedom. By this way, citizens can actively participate for the common good of a political identity. This political identity within a political community would be constructed together with the efforts of the citizens rather than the cultural identity that is taken for granted (Mouffe, 1993, p. 75).

Thus, it can be stated that the political community is not necessarily bound by the idea of a common good but a common bond and a public concern. This political community does not have a certain identity because the identity continues to be constructed (Mouffe, 1993, p. 77). The necessity to have some commonality is undeniable in a plural society, whereas this common bond should not be constrained by previous cultural, religious, historical, traditional values, rather with political identities of universally accepted norms and values. By this way, a public concern can be created among citizens that would urge them to actively try to secure their liberties based on political norms and values. The identity, in this sense, is a political identity, not a cultural one.

The creation of this political identity depends on the demands of different social classes; gender, race, ethnicity, sexual orientation, etc. (Mouffe, 1993, p. 80). Migrants and refugees in this sense can be seen as parts of the public concern that take part in the construction of a common political identity. These different groups would not be bound by the idea of a single culture but certain political values ensuring liberty and equality in a democratic polity. Correspondingly, this idea of a plural democratic citizenship is related to the multiculturalism. A multicultural society ideally gives the individual the freedom to choose his/her belonging to an ethnic, cultural, or religious group different than the one dominant in the host society. It accepts a heterogeneous society and its citizens in terms of identity but also advocates for political, social and economic integration (Apap, 2006, p. 31). For Kymlicka (2012), multiculturalism is a human-rights evolution involving ethnic and racial diversity, aiming to develop new and more inclusive models of citizenship (pp. 5,8).

Relevantly, Etzioni's (2011) societal design of the "Diversity Within Unity" (DWU) supports citizens to embrace certain core values while being welcomed, instead of allowed, to keep their distinct subcultures (2011, p. 340). It is neither complete assimilation nor celebrating diversity as in multiculturalism. To put it differently, citizens are united around certain values of the society but diversified in terms of their subcultures. In terms of unity, the mandatory core

values of the society are stated as law, language, and the history. The diversity, on the other hand, is associated with religion, a second language as the language of the country of origin, traditions and so on. These diversity elements are welcomed as long as they comply with the core values and do not violate individual rights and freedoms (Etzioni, 2011, pp. 341,342). The understanding of DWU is almost similar with multiculturalism but it presents the common values that constitute a common identity of a society in a more definite way. These values; law, language, and history are found both in liberal, republican, and communitarian citizenship theories. All in all, the common identity in democratic societies can be interpreted in various ways; it can be based on cultural identity, political identity or a consensus on universally accepted norms and values.

As the result of the discussion, the most controversial identity among all appears to be the "cultural identity" of communitarianism. Common culture and identity aspect of citizenship can act as a hurdle for naturalization at the very first step of membership as a legal status depending on how common culture, common identity or common good are defined as prerequisites. This brings us to the discussion on naturalization; what should be the conditions of naturalization and how can these conditions are justified under these three theories?

2.4. Naturalization within the Framework of Citizenship Theories

Within the context of naturalization, this thesis takes migrants who are permanent residents with no status and reside legally within a state into consideration. Naturalization is defined as the process in which a person is transformed from an alien to a citizen and given certain rights and privileges (Kostakopoulou, 2003, p. 88). Moreover, naturalization laws are designed to unite the national community, maintain its identity, and restore mutually accepted values of loyalty, devotion, and individual sacrifice for the common good; thus represent the symbolic importance of citizenship (Kostakopoulou, 2003, p. 92). It is the process lies between a migrant and the status acquisition in a particular state. There are various views on how naturalization process should be

conducted. Each different argument can be justified with one of three citizenship theories; liberal, republican, and communitarian. In some cases, these theories may overlap when explaining the naturalization process and used interchangeably.

Firstly, the liberal minimalist understanding of naturalization bases its arguments on John Rawls' understanding of "free and equal persons" who hold rights and liberties and have only a few obligations. In this sense, liberal minimalist citizenship is inclusive yet undemanding; it does not require its citizens to contribute political community in a certain way as long as they obey the laws (Hampshire, 2011a, p. 957). For that reason, it is expected from liberal minimalists to support easy naturalization of permanent residents. Joseph Carens is among the supporters of easy naturalization as a liberal minimalist political theorist. He makes a distinction between requirements, norms, and aspirations of the naturalization process. Requirements are legally enforceable standards by law. Norms and aspirations, on the other hand, refer to social expectations and hopes that citizens have for migrants and cannot be legally enforced (Carens J. , 2002, p. 109). Thus, even though migrants are expected to fulfill certain expectations of knowing the language, history, and culture of the society, they cannot be urged to do so in accordance with hopes and aspirations.

For liberal minimalists, naturalization requirements that can actually be enforced by law should be set low and measured only by the length of residence. It is stated that any migrant who lawfully resided in a liberal democratic state for a certain period of time should be granted citizenship if one demands. This argument rests on two premises; the first premise states that a person eventually becomes a full member by living, having social networks, interests, and relations with other members of the society with time and the second one argues that the state itself has a moral obligation to consider this person as a full member over time (Carens J. , 2002, p. 109). Similarly, it is argued that residence itself assists people to participate in a network of social interactions and creates a sense of 'rootedness' together with home and business ownership, employment, and

education (Kostakopoulou, 2003, p. 97). Thus, duration of residency eventually makes one a full member of society by connecting ties between the individual and the other members of the society.

From a republican and communitarian point of view, Carens' argument can be criticized on the ground that citizenship necessitates a more active commitment to the community. Residency itself offers very limited criteria for the migrants. At this point, Carens (2002) responds by stating that these concerns are understandable and relatable. In fact, he agrees that a citizen should have more characteristics than solely residing. However, he emphasizes on the point that anything other than the residency is not a requirement; it is either an expectation or an aspiration. Therefore, states should not lawfully enforce migrants to perform language, history, culture examinations of any kind. These are only what is hoped to be learned by migrants. He continues by giving the example of German-Turks who were excluded from German citizenship for a very long period of time. The descendants of Turkish guest-workers were denied citizenship although they were born in Germany and speak German for their entire life (Carens J. , 2002, p. 110). According to this point of view, even though German-Turks were expected or hoped to be integrated more in terms of language skills, and active participation, they acquired the right to citizenship simply by residing even though they did not satisfy what was expected from them.

Despite Carens' argument of easy naturalization based on residency is more plausible in theory, it is questionable in practice. For instance; there might be cases where a migrant is not engaged in any kind of social activity or relation with other members during his/her stay in society. In this case, he asserts that if a person succeeded and proved to survive in a society without knowing the language for some years, it can also be expected from the same person to be capable of participating in the political life without knowing the language (Carens J. , 2002, p. 111). According to him, it appears to be that the person's own language has been proven enough to enable him/her to live in that particular civil

society. This view cannot be accepted either by republicans nor communitarians because citizenship is not a matter of survival. Citizens should be contributing to the common good irrespective of how that commonality is defined. Migrants can indeed survive without the language skills as it was seen in the case of German-Turks as a failure of an integration process. However, that does not ensure duties and obligations are met for the sake of the community. Therefore, it might be hard to relate this thin understanding of residency to the thick understanding of membership.

Likewise, Walzer (1983) believes there are two steps for admission. Immigration is the first admission step of allowing migrants into the state and naturalization is the second admission of turning them into full members of the society. Although states are free to decide who can or cannot enter into their territory for the first step, they are morally constrained when it comes to naturalization after migrants are admitted into the society. According to him, the opportunities of citizenship must be offered to every migrant and refugee once they are taken in (Walzer, 1983, p. 62). Furthermore, if naturalization will be constrained on certain grounds, constraints should depend on time and qualifications, not on ultimate objection (Walzer, 1983, p. 60). Just like states, citizens are free to make membership exclusive like a club by constitutional constraints. However, if citizens attempt to have territorial authority over non-citizens whom they share the same territory, it would be a form of tyranny (Walzer, 1983, p. 62). It means that citizens have a right to limit citizenship on certain grounds related to constitutional requirements and perhaps make it even harder to obtain, whereas these requirements should not be based on territorial conditions. Each individual residing on the same territory as others is equal in this respect. Thus, Walzer (1983) agrees on the territorial and residence-related rights of non-citizens to demand citizenship as Carens (2002) but also accepts the fact that additional demands can be required and legally enforced.

As it can be seen from the liberal minimalist point of views, naturalization is relatively easy and demands primarily the lawful residence of migrants for a

reasonable period of time. On the contrary of this moderate view, it is stated that naturalization is a symbol of nationhood including an ethnic element and a tool for the full integration of the political community. For this reason, it cannot be restrained into a simple residency requirement which would create reactions (Kostakopoulou, 2003, p. 92). Although an exclusion based on ethnicity cannot be justified for naturalization, the society is not separate from the ethnicity of the majority of society. It is one aspect of what constructed a socio-political community from an historical-institutionalist perspective which might still have considerable significance. It is also suggested that since justification of ethnicity as a qualification for citizenship is no longer feasible in liberal democratic states, it paves the way to the practice of citizenship tests that aim integrating migrants into the public culture (Honohan, 2010, p. 100). Thus, ethnic elements might have become embedded in integration tests that can be legitimately asked for naturalization.

When it comes to republican and communitarian citizenship theories, Hampshire's (2011) nationalist conception of citizenship can be used for both. The nationalist conception of citizenship requires a sense of shared identity which is based on the particular nation's language, history, and culture. These nationalist arguments are used to justify citizenship tests across Europe stating that one needs to demonstrate its acculturation in national values, namely assimilation, as a legitimate pre-condition for naturalization (Hampshire, 2011a, pp. 961,962). Requiring language skills and knowledge based on history and culture to maintain a shared sense of national identity can be justified for communitarian citizenship. However, this view contradicts with the liberal citizenship in the sense that it imposes a single national culture and identity while liberal conception argues for neutrality and equal opportunity to choose for every individual. Furthermore, even though there might be a majority culture, it is hard to have a consensus on one specific national culture or identity due to the diversity within liberal states (Hampshire, p.162, 962).

Taking this into consideration, although knowledge of the language, institutions, and history are required, they should aim at increasing social and political interaction which would serve to the common good for all citizens rather than resulting in cultural assimilation (Honohan, 2010, p. 104). Hence, the nationalist conception refers to basic principles of republican and communitarian citizenship within the process of naturalization. These principles are not only interlinked and complementary but also controversial in terms of indicating a common culture and identity which might result in assimilation instead of integration at the end of the process.

All in all, modern naturalization requirements can be summarized under these main criteria; length of residence, language proficiency, and citizenship tests including knowledge of history (Honohan, 2010, p. 102; Hampshire, 2011a). Among these requirements, residency is the least controversial criteria and accepted by all liberal states. Following the residency condition, language requirement is the other common and less controversial requirement[7]. According to Van Gunsteren (1988), the considered applicants must have a dialogic capability to be able to discuss, argue, express, and share ideas with other citizens. In order to fulfill these requirements, the considered applicant has to have language proficiency (Gunsteren, 1988, p. 736). It is agreed as an efficient way to sustain social, political, and economic participation in a society. It is the minimum expected requirement for any activity that is conducted in the public sphere. Even if it is not an obligation, it would still be a necessity to conduct any daily work. Furthermore, if the language criteria are considered from a liberal, civic republican or communitarian view, liberal citizenship would agree on a certain level of language proficiency since it would make it easier to pursue private interests for citizens. For republicans, citizens would definitely need to know the language in order to engage in social and political relations, actively participate, and contribute to the common good. Lastly, it would certainly be accepted as a crucial part of the cultural identity from a communitarian perspective.

[7] The controversy may arise from the level of language required for naturalization.

When it comes to citizenship tests, they are the most controversial criteria for the naturalization process as they resemble the thickening of integration requirements under the communitarian citizenship theory. Several Western-European states such as: Austria, Denmark, Germany, Switzerland, the UK, and the Netherlands, introduced naturalization tests between 2000 and 2010 (Vink & Groot, 2010, pp. 726,727). These tests can be practiced either in the form of a written examination or an interview that usually ask applicants about civic knowledge, country's history, culture and in some cases applicant's own values and belief sets (Hampshire, 2011a, p. 956). The content of these tests are highly controversial since some of the questions ask about factual knowledge and some are argued to be related to inner dispositions or personal beliefs (Joppke, 2010, p. 141). These tests are argued to be reinvigorating national citizenship (Hansen, 2009, p. 17). Relevantly, these tests will be examined throughout this thesis in detail in the following chapters whether they should be limited to civic knowledge and the extent to which cultural and personal questions should be included.

As a result of the discussion on naturalization, it can be concluded that naturalization requirement is satisfied with a residency requirement and has relatively easy measures as long as one complies with the law of the state in liberal theory. Secondly, the republican citizenship allows citizens to keep their particular ethnic and cultural identifications for naturalization (Kostakopoulou, 2003, p. 95). It means that citizens are free to continue their traditional affiliations as long as they are committed to the common public good by engaging with the political community. In order to participate, they must know the language of the society and be aware of laws and regulations of that nation. For this reason, republicans might demand citizenship tests asking about law and institutions of the state and a language test. Lastly, communitarian citizenship requires maintaining community's identity which can be best reflected on citizenship tests with historical and cultural knowledge of the society for naturalization. The language test would also be justified for migrants who are taking it under communitarianism since language can be accepted as a part of shared identity by

the citizens. Thus, different concepts of naturalization are justified by three main citizenship theories and communitarian citizenship appears to be the most demanding one.

All in all, these three citizenship theories are not distinctly separate from each other in terms of naturalization conditions. For instance; liberal citizenship would agree with the language criteria as long as it provides an equal opportunity for individuals to pursue their personal interests. Likewise, civic republicans would recognize the necessity of knowledge of history and culture of the society as a precondition if it is proven to motivate citizens to engage in political participation in a more effective way. Moreover, there is a convergence in terms of the residency requirement for all citizenship models; all accept the fact that migrants should be legally residing on the state's territory. It can also be argued that there is a convergence on the language requirement, whereas each theory interprets it differently. For liberals, knowing the language of the society increases the opportunities for employment and thus increases the chances of pursuing private interests. Following this, for republicans, linguistic knowledge supports political participation and results in effective integration. Lastly, communitarians see language as a fundamental feature of national identity and culture (Kostakopoulou, 2003, p. 102). Therefore, these theories can be used collectively in certain cases even though considerable divergence exists on certain aspects.

Seeing these divergences and convergences of naturalization requirements within the context of citizenship literature, the next chapter will elaborate on civic-integration requirements started with the 2000s. The aim is to understand the reason why certain Western-European states chose to adopt them and how these policies can be justified and serve to the interest of these citizenship and naturalization conceptions. In order to understand the rhetoric of the policy change, integration as a concept and process will be defined since naturalization and integration are used in a complementary manner. By this way, the relation between migration, integration, naturalization and citizenship acquisition will

become clearer. The naturalization will be taken within the framework of civic-integration requirements for the rest of this thesis.

CHAPTER 3

DEFINING CIVIC INTEGRATION IN WESTERN-EUROPE

3.1. The Relation between Migration, Integration, and Citizenship

Naturalization requirements that were discussed within the context of citizenship theories in Chapter 2 are in line with the concept of integration. Migrants are entitled to complete an integration process before being considered for naturalization and therefore for the right to citizenship. For this reason, integration is a dependent variable of citizenship acquisition. It can be argued that naturalization requirements and integration requirements are overlapping since they are mutually dependent on each other. However, in practice, integration should either be accomplished before being considered for naturalization or integration can be embedded within the process of naturalization. For the latter, one would be naturalized when integrates. Either way, integration and naturalization are interconnected. This thesis tries to find out if civic integration requirements act as obstacles towards naturalization.

The relevance between these three concepts, migration, integration, citizenship, is closely interdependent. To put it in simple terms, migration creates the presence of foreigners on the territory of host societies. Contrary to the general understanding of the 1960 and the 1970s when it was assumed that migrants would go back home after a while, it is now generally accepted and assumed that they are more likely to stay permanently. Consequently, migrants are entitled to participate through residence and employment as long as they stay (Guild, 2006, p. 38). At that point, a connection between migration and citizenship is formed because those who stay as legal residents are potential

citizen candidates. Between these two concepts, migration and citizenship, comes the integration as the point of transition in between a migrant and a citizen (Guild, 2006, p. 39). The process of integration is between a state and the migrant and therefore it is up to states to regulate integration policies. Irrespective of the sort of an integration policy, integration as a concept acts as the mediator of becoming a citizen. For this reason, migration, integration, and citizenship are mutually interlinked.

Integration resembles the relation between the whole and its parts, namely groups, institutions, and organizations, and their relation with the entire society (Apap, 2006, p. 31). Integration can be defined both from a macro level and a micro level. Macro level of integration refers to the characteristics of the society; the more a society is integrated, groups and individuals become more related to one another (Entzinger & Biezeveld, 2003, p. 6). This macro level of integration of a society is also called as the "social cohesion". On the other hand, the micro level of integration is a relatively more complex understanding; it is perceived from the perspective of groups and individuals instead of the perspective of society. It is argued that such integration has various dimensions such as; "frequency" that refers to number of ties an individual has in society, "intensity" that is related to the sense of belonging and familiarity one has towards those ties, and "identification" which is related to the extent a migrant identifies himself/herself with the host society and develop stronger ties (Entzinger & Biezeveld, 2003, p. 6). Hence, the macro level integration refers to the state-level of interaction, whereas the micro level is based on the individual-level of interaction of an individual within a particular society.

These dimensions cannot be taken for absolute indicators of the integration since one dimension might not have a direct effect on the other. For instance; a migrant might more frequently see a certain group of individuals in the public sphere but have a stronger sense of belonging to his/her family or to the sending country. Nevertheless, it is stated that frequent and intense relations of migrants with the individuals of host society are expected to bring stronger

identification and lead to a better mutual understanding and social cohesion. Although these integration dimensions sound plausible, they do not explain how having frequency, intensity, and identification at the same time differs from assimilation into that society. In other words, how can one integrate into society without necessarily assimilate into the common culture?

At that point, the difference between assimilation and integration should be explained. It is asserted that assimilation requires migrants to adopt the dominant culture prevailing in the society (de Groot, 2006, p. 22). On the contrary, integration is the process in which migrants acquire certain rights and participate in the society without being urged to assimilate to the dominant culture of the host society (de Groot, 2006, p. 21). Integration became a popular term starting with the 1960s as a response for assimilation and began to be used in a complementary manner with multiculturalism which advocates for diversity in the 1980s (Apap, 2006, p. 30). Thus, the former demands the sacrifice for sub-cultures for the shared common culture in order to be a full member of the society, whereas the latter does not demand migrants to give up their cultural, traditional or religious entitlements in order to be a part of the society. Although integration and assimilation differ from each other in theory, one should pay attention to the content and intent of an integration requirement in order to see if it attempts cultural assimilation in practice.

Moreover, it is argued that despite policy variations, integration should always be based on social inclusion and new measures that are developed should be in line with achieving and ensuring this inclusiveness (Guild, 2006, p. 40). Inclusiveness refers to the idea that all migrants should be treated equally in the process of integration although some might not fulfill all the requirements. In order to see how different integration understandings perceive migrants, certain traditional models will be introduced.

3.2.Traditional Integration Models

A traditional model of integration can be defined as an institutional structure, a national structure, a political structure, a public policy, etc. that show how social reality is shaped by a nation's self-understanding (Bertossi, 2011, p. 1562). Three fundamental integration models exist in the literature; multicultural, assimilationist, and segregationist model (Carrera, 2006, p. 2), (Bertossi & Duyvendak, 2012, p. 237). The multicultural model embraces diversity and aims at preserving different cultures and identities of immigrant communities. Sweden, the Netherlands, and the UK are among traditional multicultural societies. Assimilationist model is based on the complete assimilation of a migrant into a common identity determined by the host community. This approach is only inclusive once a migrant is transformed into a citizen through assimilation and France is the most prominent example of it. Both the multicultural and assimilationist models are supporters of the *jus soli* principle which is the birth-right citizenship based on territorial right. Lastly, segregationist model, which is also known as the exclusionist or differentialist model, is characterized by its rigid migration, integration, and citizenship policies. Access to citizenship is relatively harder compared to other integration models with a strong ethnic-oriented *jus sanguinis* principle that is the right of blood (Brubaker, 1992). Germany and Austria are traditionally identified with this model. This diversity between nation-states and integration models developed due to different historical backgrounds, societal relations, and the patterns of migration flows throughout time (Carrera, 2006, p. 2). Thus, different integration patterns were constructed with time and states began to show variations.

The historical variation and its results on national integration models can be explained by two main variables. The first variable looks if the country is a former colonial power because colonialism resulted in a way that people from colonialized countries earned special immigration opportunities and certain rights. Due to the previous interactions with the colonizer state, they hold similar cultural and linguistic ties (Howard, 2006, p. 447). The second variable looks to

see if that state had democratization process in the 19th century because early democratizers tend to have more inclusive and civic-oriented national identity instead of an ethnic one. Early democratization is once again the result of the colonial experience that resulted in the acceptance of the different group of people with various languages, cultures, and religions. As opposed to this, states that had relatively late democratization processes in the 20th century are argued to have more exclusive and restrictive policies (Howard, 2006, p. 447).

Consequently, states that were former colonial powers and had early democratization experiences formulated more liberal models as the multicultural UK, Netherlands and the assimilationist France. States that lack these processes, like Germany and Austria, developed more restricted and ethnic-oriented integration and citizenship policies. Even though certain countries are associated with these national models, they cannot fully encompass and explain cross-national differences in issues related to migration and integration (Bertossi & Duyvendak, 2012, p. 238). In other words, these models are not homogeneous and static philosophies, they are subject to change. Hence, they should not be reduced to stereotypes while interpreting migration and integration policies. Nonetheless, they serve as models for basic assumptions within this field.

3.3. Policy Liberalization in 1980s and 1990s

Regardless of whether a European state was a former colonial power or had an early democratization process, Western-European states began to experience mass migratory flows after WWII (Freeman, 1995, p. 889). The flow of immigration to Europe was understandable in terms of the economy and demography in the postwar era. The labor shortages and the demographic decline led to receiving guest-workers from third-countries. By this way, the institutionalization of migration has started and it began to be politicized. Even though migration slowed down in the 1970s after the oil crisis and the economic downturn, migration continued with family reunifications and individual asylum applications in the 1980s and the 1990s despite states expressed their

unwillingness to accept newcomers. It is argued that new labor migration was started to be seen overwhelming and the policies became inclusive only for the ones who are already inside (Joppke, 2007b, p. 3). The aim was to integrate the already existing migrant groups residing in states. Therefore, integration policies had started to show similarities among nation states by the 1990s with an overall liberalization.

The similar change in integration policies and the liberalization trend were observed within an EU Framework by the end of the 1990s. The former national integration models had disappeared and a convergence started to be observed among states through legal and cultural standardization (Joppke, 2007b, p. 4). The first example for these standardizations is the 2000 Race Directive (The Council of the European Union, 2000) that prevents discrimination. This Directive states that "any direct or indirect discrimination based on racial or ethnic origin should be prohibited throughout the Community and this prohibition of discrimination should also apply to nationals of third countries"[8] As it can be understood; the Directive has a broad scope and encompasses TCNs in member states. It puts an emphasis on the anti-discrimination principle.

Secondly, Common Basic Principles for Immigrant Integration Policy (CBPs) were adopted by the Justice and Home Affairs Council for immigrant integration around the EU in 2004. CBPs were the first move towards establishing a common EU framework for migrant integration by introducing the concept of integration within the EU context (Carrera, 2006, p. 14). Although the principles are not binding among the member states, they propose certain standards for integration. Most prominent CBPs are as follows: "integration is a dynamic, two-way process of mutual compromise of all immigrants", "integration requires respect for the basic values of the EU, basic knowledge of the host society's language, history and institutions is essential for integration", and "practicing diverse cultures and religion must be guaranteed depending on

[8] See the Preamble of the Council Directive 2000/43/EC.

the Charter of Fundamental Rights" (Justice and Home Affairs Council, 2004)[9]. Even though integration is stated as a two-way process here, the principle requiring the knowledge of language, history, and institutions of the society appear to be a one-way compromise demanded from migrants and it is the main determinant of the integration policy (Carrera, 2006, p. 15). However, if respecting one's religion and cultural diversity can be reflected on the integration policy as well, then it would resemble a two-way accommodation in which migrants would be learning basic values of the host society and the society in return would be accepting the diversity without requiring assimilation or vice versa.

Furthermore, the liberalization trend was argued to be related to the reconfiguration of citizenship from a nationhood understanding to a personhood understanding and expansion of universal human rights in the post-Cold War era (Soysal, 1994, p. 137). The spread of the human rights discourse was not only specific to Western-Europe but started to be witnessed in all liberal democracies. Soysal (1994) asserts that the principle of human rights assigns a universal status to individuals and to their rights as human-beings and the same principle eliminates national boundaries leading to the formulation of the post-national citizenship (Soysal, 1994, p. 157). In a sense, international norms of freedom and equality, universal human rights, the rise of multiculturalism, and global economic order delegitimized ethnic and racial criteria in migration and integration policies (Adamson, 2006, p. 181). Relevantly, Western-European states continued receiving migrants despite the restrictions made after the 1970s and courts secured the constitutional residence and family rights of migrants (Joppke, 1998, p. 271).

Also, the end of Cold War and the removal of Berlin Wall in 1989 paved the way to an asylum crisis and migration had become a matter of high-politics (Freeman, 1995, p. 893). With the elimination of political barriers, individuals found the opportunity to return their country of origins or destination countries

[9] The full list of CBPs can be accessed at http://www.eesc.europa.eu/resources/docs/common-basic-principles_en.pdf.

between East and West.[10] Also, the number of asylum seekers reached 695.000 in 1992 as a response to the civil wars and the dissolution of Yugoslavia (Castles & Miller, 2009, p. 109). Thus, end of this era resulted in the expansion of universally accepted human rights and norms with the increased number of asylum seekers and refugees. Thus, the politics of migration in Europe began to be institutionalized around universally shared rights (Freeman, 1995, p. 896).

The liberal convergence thesis in this era provides several examples of countries that started to grant second and third-generation migrants with birth-right citizenship like Germany, decreased residency requirements like Luxembourg, and allowed dual citizenship like Finland, Luxembourg, and Sweden (Goodman & Howard, 2013, p. 112). The convergence did not refer to the same policy change around Western-European countries but there was a convergence in terms of the liberalization trend. Hence, even if further migration was not desired, the spread of international norms and values, with the discourse on human-rights and together with the end of Cold War, states continued to accept more migrants and the liberalization process continued and reflected on integration and citizenship policies.

3.4. The Restrictive Turn in the 2000s

As opposed to the liberalization trend in the 1990s, restriction on naturalization criteria and integration requirements had started to be seen by the end of the 1990s and beginning of the 2000s. The policy convergence in integration policies had continued among states but changed their direction into restrictiveness. The length of the expected residency increased in those states that either had traditional liberal policies or recently had liberalization like Belgium and Luxembourg, the renunciation requirements that prevent dual-citizenship were re-adopted in the Netherlands, and most importantly, civic-oriented integration requirements were adopted in France, the UK, the Netherlands,

[10] East-West movements increased but most migrants were members of ethnic minorities moving to 'homelands' where they had a right to entry and citizenship. For instance; ethnic Germans (Aussiedler) to Germany and Russian Jews to Israel (Castles & Miller, 2009, p. 109).

Germany, Austria, and Denmark (Goodman & Howard, 2013, p. 112). Among main motivations behind such restrictive turn is stated to be the rising economic and security concerns, and the failure of migrant integration. Hansen (2009) asserts that the relationship between integration and citizenship had to be re-considered for two reasons: a substantial number of migrants failed to succeed in Europe's economy and they failed to acknowledge Europe's basic liberal democratic values (Hansen, 2009, p. 15).

Among the EU, unemployment rates among non-EU migrants were considerably high in the 1990s (Joppke, 2007a, p. 6). For instance; the unemployment rate of non-EU foreigners was 18.5% in the Netherlands in 1999, it was % 15.5 in Germany in 2000, and 27.9% in France in 2000 (Hansen, 2009, p. 16). For this reason, states aimed at avoiding migrants becoming financial burdens on the welfare system (Orgad, 2010, p. 84). Furthermore, it was observed that the second-generation immigrants were performing poor in education; there was a considerable gap between the performances of non-immigrant and immigrant children in math, science and reading abilities (Hansen, 2009, p. 15).[11] It was argued that these inefficiencies in unemployment and education are partly because of poor language skills (Hansen, 2009, p. 16). Integrating migrants into the labor market and to the education system had become crucial objectives.

In terms of security, in the aftermath of the Cold-War, Europe has expanded its safeguarding activities and securitized border crossings. The Schengen Agreement of 1995 was incorporated into the EU with the Amsterdam Treaty of 1999 aimed at having a single external border that can be traced with cooperation (Adamson, 2006, p. 179). The security concerns rapidly increased with the 9/11 attacks and terrorism began to be seen as a common enemy. Following this, 2004 terrorist attacks in Madrid and London in 2005, the murder of the right-wing politician Pim Fortuyn in 2002 and the director Theo-Van Gogh

[11] For more information on education issues among immigrant children, please see Schnepf, S. V. (2008). 'Inequality of Learning amongst Immigrant Children in Industrialized Countries' Southampton: University of Southampton Discussion Paper No. 3337. Available at: http://ftp.iza.org/dp3337.pdf.

in 2004 in the Netherlands contributed to the problem of an integration failure. Following these attacks, Muslims became associated with fundamentalism, violence, and terrorism (Kaya, 2012, p. 140) and Islam began to be perceived as incompatible with Western values (Mouritsen, 2015, p. 709).

In the meantime, it was argued that international human rights discourse had softened in an environment where terrorism has become the biggest fear (Goodman & Howard, 2013, p. 120).There was a shift from traditional security concerns of the Cold-War era towards a common security concern in Europe (Triadafilopoulos, 2011, p. 866). Accordingly, globalization and international migration had started to be interpreted as the failure of socio-economic integration and security concerns by the start of the 2000s.

Considering these developments, national integration models that were previously seen as national legacies or even sanctuaries had become burdens against migrant integration (Bertossi & Duyvendak, 2012, p. 237). For instance; relying on multicultural premises of inclusiveness would overlook the concerns over Muslim migrants and their failure to integrate. In his 2011 speech, David Cameron the former-prime minister of the UK asserted that the UK, has failed to offer a vision for Muslims to feel a sense of belonging. He continued by saying the segregated communities were tolerated in the name of multiculturalism when they were against British values and these led young Muslims to extreme ideologies (Independent, 2011). Consequently, the factors that gave rise to the restrictive turn were believed to be disloyalty and illiberalism of Muslims (Joppke, 2009, p. 115). Illiberalism refers to the failure of Muslim immigrants to integrate and comply with liberal values. This sort of disobedience resulted in the change of perceptions against Muslim minorities and justification and legitimization of civic-integrationism to urge them to be ‘liberal’.

In addition to this, the anti-immigrant discourse arising from these concerns were politicized, that discourse mobilized the anti-immigrant sentiments of the public and resulted either in the blockage of the liberalization trend or introduction of new restrictive requirements (Goodman & Howard, 2013, p. 113).

Even though ethnic and racial criteria of migration and integration policies were abandoned due to the spread of universal human rights back in the 1990s, the national identity criteria have remained contentious. It corresponds to the idea of Huntington's (1993) "clash of civilizations" thesis in a way that Islam is incompatible with Western values and therefore there is a potential conflict between Western civilization and non-Western civilization of Islam. However, Western democracies cannot exclude immigrants on a religious basis which would cause discrimination. This challenge was mostly observed on states that lifted ethnic identity and legitimacy, and adopted civic nationalism understanding instead (Adamson, 2006, p. 182). In other words, liberal democratic states that acknowledge universal norms and values but concerned about security threats at the same time, had to develop an alternative way to manage migrant integration without using ethnic and racial principles. In a sense, integration policies had to be justified without ethnic or racial conditions which would make the policy illegitimate. To put it simply, the responses to the issues of socio-economic failures and security concerns were given on the national-level by introducing civic integration policies (Hansen, 2009, p. 16). This brought a restrictive policy change among Western-European states starting with the 2000s.

3.4.1. Civic Integration Requirements

The civic integration requirements that started to be practiced by the end of the 1990s emphasized on the membership aspect of citizenship in which applicants became more responsible with their own contribution to the society. These requirements refer to the republican and communitarian theories of citizenship and distinguish from multicultural policies of integration in terms of their obligatory nature. Since this thesis puts emphasis on the role of the civic integration requirements, it will be elaborated upon several aspects including its normative and empirical analysis.

First of all, the word "civic" is defined as a notion that belongs or relates either to a citizen, citizenship or rights and duties that a citizen have.[12] According to this definition, civic integration requirements set the structure of integration policies that are related to the citizenship understanding of that particular state. Any integration policy that implies what is expected and aspired from migrants when they become citizens can be called as a civic-oriented integration policy. Relevantly, civic integration requirements encompass proficiency in host society's language, knowledge of history, institutions, and culture that can be demonstrated through citizenship tests and commitment to core values either through an oral oath or a written declaration. Among these criteria, language and knowledge of institutions are the least controversial ones that are accepted by all three theories of citizenship. History and culture, on the other hand, are the most disputed aspects of civic-integration policies. Since common good, common culture, shared identity and the difference between historical facts and cultural norms are hard to distinguish, it is difficult to justify these measures.

Furthermore, civic-integrationism differs from previously applied integration approaches such as social and political integration for two reasons. The first difference is its obligatory character (Joppke, 2007c, p. 248). It is obligatory in the sense that the access to the status of citizenship depends solely on the successful fulfillment of certain obligations specified by the integration requirements. The integration is no longer promoted but it is required (Goodman & Wright, 2015, p. 4). Thus, it does not leave a room for a migrant to acquire citizenship based on the duration of residency first and later be subjected to integration policies. It is the migrant's obligation to prove the integration standards are fully met before being considered for the legal status.

Therefore, civic integration supports the individual to have self-autonomy and responsibility in the integration process. Moreover, unlike ethno-centric or civic-territorial conceptions of citizenship where an individual is believed to

[12]See the Oxford English Dictionary Online Database available at http://www.oed.com. The dictionary gives four different definitions for the word 'civic'. The second meaning among them is taken into consideration for this thesis.

become a citizen either by having parents who are citizens or by being born on the territory of the state, civic-integrationism argues that citizenship can be earned through participation and engagement within the society (Bloemraad, 2007, p. 332). It does not represent a nationalistic view of citizenship either. Instead, it tries to see if applicants can adopt current civic practices and values as a responsibility and obligation before acquiring the status of a citizen. Taking these definitions into consideration, civic integration policies can be discussed under two main categories; normative and empiric.

3.4.2. The Normative Discussion on the Civic-Turn

In normative terms, each citizenship theory can justify civic integration policy in its own way. Liberal citizenship theory would agree that the future citizens should be aware of the legal institutions to pursue private interests, and language is an asset in order to accomplish that. Therefore, they would support the requirements regarding the knowledge of state institutions and language. Republicans would also demand language competency and knowledge of institutions but for a more active and effective political participation. Lastly, the communitarians would see language as a shared culture and institutions as the part of common good therefore strongly support for the proficiency of both. Communitarian citizenship would also require migrants to share a common identity and a shared culture but these two areas are the most disputed ones since there is not an evident line to determine the extent to which a migrant is required to have cultural norms.

Furthermore, the normative consideration of civic-integration requirements is discussed whether these measures can be justified within liberal democratic states. To begin with, Joppke contributes to the discussion by using John Rawls' political liberalism assumptions on integration. He asserts that the integration of a migrant can only be carried on with what is 'right', instead of a consensus on what is 'good' (Joppke, 2007a, p. 3). This assumption also draws the line between integration and assimilation. Political liberalism as a theory

would prefer taking integration into consideration to study migration instead of assimilation (Joppke, 2007a). The assimilation process would require imposing cultural standards and it would be contrary to the idea of equality, freedom, and justice of liberalism in Rawlsian terms. Hence, even if the aim is to bring more restriction to the migrant integration process, it should be performed within the framework of political liberalism.

At this point, it is argued that this recent integrationism is 'aggressive integrationism' based on the Schmittian understanding of liberalism aiming at preserving Western civilization from illiberal threats (Triadafilopoulos, 2011, p. 863). Schmittian liberals identify core liberal values of a society and take measures in order to protect them. In this sense, civic-integrationism does not mean the rebirth of nationalism or racism but an attempt to have homogeneity of liberalism (Joppke, 2007a, p. 14). It does not aim to put the national or ethnic values forward, whereas it prioritizes universal liberal values shared by all liberal democracies. Similarly, even though this civic turn can be named as "aggressive integrationism", it does not correspond to the awakening of xenophobia. Instead, it is a liberal response to multicultural liberalism (Triadafilopoulos, 2011, p. 863).

Likewise, the civic-integrationism is also referred as "identity liberalism" representing national identities and ideologies of particular states. It builds a national identity on liberal values instead of ethnic bonds (Triadafilopoulos, 2011, p. 870). Identity liberalism is most applicable when migration is experienced from less democratic states to more democratic ones. If migrants do not accept and adopt democratic structures in receiving states, the exclusion for the sake of democracy is necessary together with the assimilation (Tebble, 2006, p. 474). Therefore, pluralism is seen as a challenge for preserving Western values in a way that liberalism itself might justify illiberal means of migrant integration. 'Illiberal' refers to demanding personal justifications from a migrant while also defending liberalism which supports individual freedom in every aspect. The common ground of the legitimization on civic-integrationism is; it aims to

maintain norms and values that are not affiliated with a specific race, ethnicity or religion. It is preserving what is universally liberal through illiberal costs.

Although abovementioned scholars argue that civic-integrationism does not refer to xenophobia, nationalism or racism, illiberal attempts might result in discrimination in practice. The nature of civic integration requirements, asking history and cultural knowledge of a particular society might include not only universal principles but also national ones and can be justified with the communitarian understanding of citizenship. In this respect, certain immigration regimes in Western-Europe are argued to be exploring migrants' moral conceptions instead of their knowledge and understanding of the host society's way of life. In other words, psychological attitudes and moral judgments are being measured rather than assessing legal acceptance and cognitive understanding (Orgad, 2010, p. 93). Citizenship tests from this point of view should only be regarded as liberal if they ask facts based on history, culture, and institutions because this sort of knowledge is cognitive and can be learned by anyone.

Moving from facts to values, citizenship tests that explore inner dispositions are illiberal because they control beliefs rather than behaviors (Joppke, 2010, p. 141). They become forms of ideological exclusion aiming to control the freedom of thought and conscience of the migrant (Orgad, 2010, p. 93).Thus, the road to citizenship might be illiberal even if it is legitimate when citizenship tests are being used for ideological exclusion in Western-Europe. States have the legal competence to regulate their integration policies but that does not mean the content of integration requirements comply with liberal assumptions of freedom and equality.

This sort of exclusion is contrary to the basis of political liberalism but it is not clear how to draw a line between inner dispositions and factual knowledge. There is a "liberal paradox": either minorities will be allowed and tolerated to pursue their illiberal means under multicultural liberalism or illiberal means will be used to preserve liberal values from the contrary behaviors of those minorities

(Orgad, 2010, p. 92). Either way, the meaning of liberalism is undermined. As a possible solution, Orgad (2010) suggests a solution called "National Constitutionalism" to decide upon what can be asked within liberal principles and what cannot.

This concept states the idea that migrants have to know and accept the essential constitutional principles of the state. A constitutional identity is embedded within laws in accordance with the history and traditions of that particular state. National Constitutionalism is not universal like Habermas' Constitutional Patriotism[13]; it still represents national identities since it determines naturalization conditions. However, it relies on mutually accepted norms, values, and principles secured by the Constitution by representing a legal, non-emotional bond within a political community (Orgad, 2010, p. 100). Due to this legal aspect, a migrant who seeks citizenship does not have to morally agree with a constitutional principle itself but has to accept and respect it.

Furthermore, since each state has different historical backgrounds, each constitution shows different characteristics. In order to prevent possible confusions on what really is a part of national history; questions in citizenship tests should ask about more-legitimate national history. For instance; instead of asking French history on the citizenship tests, the history of French Constitution can be included (Orgad, 2010, p. 104). Therefore, National Constitutionalism derives its power from the law itself and as long as migrants comply with rules and principles stated in the Constitution they are legally accepted by the society.

In general, the logic of these requirements is stated to be treating migrants as individuals who are responsible for their own integration (Joppke, 2007b, p. 9; Entzinger, 2006, p. 131). Relevantly, civic-integration departed from an ethnic-minority approach to an individual one, re-emphasizing that integration is a two-way street in which migrants as individuals have to adapt and change (Odmalm, 2007, p. 30) Although the civic turn is reflected as an individual approach not

[13] Constitutional Patriotism is the commitment to an universal Constitution that represents universal norms and values. The idea was developed by Jürgen Habermas in order to have uniformity among different states for the sake of European citizenship (Habermas, 1998).

targeting any ethnic minority, it targets a religious minority which is Muslims as the source of both integration failures and security concerns. The intent, content and the results of these policies will be mentioned in Chapter 4 in detail with case studies. The civic-integration requirements represent the thickening of citizenship as it was stated in the republican and communitarian citizenship theories since they all require a language element and knowledge on what is called the "common identity". Thus, the "restrictiveness" resembles the "thickening".

As it can be seen, the normative explanation of the reasons for the restrictive turn primarily depends on the theoretical interpretations. Certain justifications behind the civic turn could be named as security concerns, ensuring social cohesion to maintain stability in a homogenous state and to encourage participation through teaching language and preventing migrants to be culturally alienated (Orgad, 2010, p. 84). As a result, this shift to civic-integrationist approach does not only resemble a restrictive turn but also a shift from right-based citizenship to obligation-based citizenship for migrants who want to acquire citizenship (Joppke, 2008, p. 35). It means that the liberal citizenship which emphasizes more on rights and less on obligations had lost its influence in the 2000s and a republican or a communitarian citizenship concept became more dominant and demanding in terms of participation, duties, and obligations.

Moreover, the purpose of a restrictive citizenship requirement might be to make new citizens ready to participate in social and political life (Michalowski, 2011, p. 766). Thus, a restrictive measure does not necessarily mean cultural assimilation in which certain values are dictated. In order to separate one from another, there needs to be a systematic analysis of the content of these integration requirements because having a restrictive measure does not mean it pursues illiberal means.

All in all, it is argued that a civic requirement is illiberal when it seeks personal moral judgment or inner disposition of a migrant. A policy is liberal only when it seeks to find out the factual and legal knowledge. Therefore, these

normative explanations should be considered with specific cases by looking at the objective, intent and the content of requirements.

3.4.3. The Empirical Discussion on the Civic-Turn

Even though the rhetoric on liberalization and restriction of integration policies is plausible in normative terms, it is hard to measure the policy outcomes of these policies in empirical terms. In order to see the policy change in practice, certain indices are being used. With the help of several empirical studies, this part of the thesis looks at citizenship policy scores of Western-European states in the 1980s in Table 2 in order to see whether the policy became more liberal or restrictive in the 2000s. Later, changes in integration requirements are presented between 1990 and 2010 to understand the policy change within this timeframe in Table 3. Following this, the introduction of civic-integration requirements between 2000 and 2010 are shown in detail in Table 4. Lastly, the outcomes of these integration policies are elaborated by using the findings of MIPEX and CIVIX in Table 5.

To start with, Citizenship Policy Index (CPI) measures criteria based on elements of jus soli, years of residence, dual citizenship, and civic integration requirements (Howard, 2010; Goodman & Howard, 2013). Each element is scored on a 0-2 range; ‘0’ points out rejection, forbiddance or restriction, ‘1’ resembles a medium and ‘2’ means no restriction and overall easy access. Thus, countries with low scores (0-1.5) are those with restrictive policies, countries are neither restrictive nor liberal if their score is between 1.5 and 4, and lastly those have higher scores are usually more liberal (4 and above).

Table 2. Citizenship Policy Scores of Western-European States in 1980s

Countries	**Jus soli**	**Residency Requirements**	**Dual Citizenship**	**Total Score in the 1980s**	**Citizenship Policy**
Germany	0	0	0	**0**	**Restrictive**
Austria	0	0.50	0	**0.50**	
Luxembourg	0	0.50	0	**0.50**	
Denmark	0	1.43	0	**1.43**	
Finland	0	1.72	0	**1.72**	**Medium**
Sweden	0	1.72	0	**1.72**	
Netherlands	1.50	1.22	0	**2.72**	
France	1.50	1.22	1.50	**4.22**	**Liberal**
Ireland	2.00	1.11	1.25	**4.36**	
Belgium	1.50	1.75	1.75	**5.00**	
UK	1.75	1.72	2.00	**5.47**	

Source: (Howard, 2010, p. 4)

The time range of 1980s is chosen for the purpose of showing Western-European states' positions before the liberalization and restriction trends had affected them. Most prominent examples are Germany with a restrictive citizenship model, the Netherlands with a relatively liberal model, France with a liberal model, and the UK as the most liberal model with the highest score among 11 Western-European states. It is seen that these scores and attributions are in line with traditional integration models and multicultural and segregationist assumptions by the 1980s (Howard, 2010, p. 4). For instance; Germany has the lowest score in its citizenship policy and this overlaps with its segregationist

integration model. Using this assessment, it is possible to interpret forthcoming policy changes in these areas in the next decades.

There had been considerable changes in these three elements; jus soli, residency requirements, and dual citizenship. Also, civic integration requirements were introduced as additional criteria starting with the 1990s. Civic integration requirements are divided into two; language and country knowledge. The language requirement can be justified for the purposes of republican and communitarian understandings of citizenship and there is an overall consensus on the necessity of language skills as almost all Western-European states demand except Sweden and Ireland. Country knowledge remains as a vague terminology without specifying any historical, cultural or religious point and Finland, Sweden, Ireland, and Belgium do not require any. Also, certain states require language skills but not country knowledge such as Belgium and Finland.

Table 3. Changes in Integration Requirements between 1990 and 2010

Countries	**Jus soli**	**Residency Requirements**	**Dual Citizenship**	**Civic Integration Requirements**	
				Language	**Country Knowledge**
Germany	in 2000	Decreased from 15 to 8 in 2000	No[14]	in 2000	in 2008
Austria	No	10	No	in 1998	in 2006
Luxembourg	in 2008	increased from 5 to 7 in 2008	in 2008	in 2001	in 2008
Denmark	No	Increased from 7 to 9 in 2002	No	in 2002, 2006, 2008	In 2002, 2006, 2008
Finland	No	Increased from 5 to 6 in 2003	In 2003	in 2003	No
Sweden	No	5	In 2001	No	No
Netherlands	Yes	5	Accepted in 1992,lifted in 1997	in 2003	in 2003
France	Yes	5	Yes	Yes	in 2003
Ireland	Yes	4	Yes	No	No
Belgium	in 1992	Increased from 3 to 5 in 2010	Yes	in 2010	No
UK	Yes	Increased from 5 to 8 in 2009	Yes	in 2002	in 2002

Source: (Goodman & Howard, 2013, p. 117)

Taking both the Table 2 and Table 3 into consideration, there are certain outstanding findings. First of all, Germany had a considerable liberalization in 2000 by introducing birth-right citizenship to second and third generation migrants and decreased its residency requirement from 15 to 8 years but this

[14] There is dual citizenship but it is an exceptional case.

liberalization had come with a language requirement in the same year. Following this in 2007, civic integration requirements were put into power. Secondly, Denmark started and continued a restrictive trend starting with 2002 by increasing its residency requirement from 7 to 9 years. In addition to this, it introduced civic-integration requirements in 2002, 2006, and 2008 respectively. Similarly, Luxembourg started requiring language skills in 2001 and increased its residence requirement and country knowledge in 2008. Lastly, the UK and the Netherlands both introduced civic-integration requirements in 2002 and 2003 respectively. The common ground among all these findings is that the newly introduced civic criteria have started to be observed in the 2000s. Also, Luxembourg, Denmark, Finland, Belgium, and the UK increased their residence requirements between 2000 and 2010, except Germany (Goodman & Howard, 2013, p. 117).

In order to take a closer look at civic integration requirements within the context of citizenship policies, knowledge and language assessment, and commitment to the state can be measured. Instead of including 11 Western-European states in Table 2 and Table 3, the following table focuses on the states where there have been considerable changes in citizenship policies in terms of particular civic-integration measures. Thus, Western-European states like Finland, Sweden, Ireland, and Belgium are not within the scope this table because of their relatively more liberal policies that do not require considerable civic requirements as stated in the previous Table 3.

Table 4. Civic-Integration Requirements for Migrants

Countries	**Knowledge and Language Assessment**[15]	**Commitment**	**Years of Change**
Germany	Test for knowledge, Interview for language (B1)	Oath	2000, 2008
Austria	Test for knowledge, Interview for language(A1)	Oath	1999, 2006
Luxembourg	Interview (listening B1,speaking A1)	No	2002, 2009
Denmark	Test (B2)	Oath	2002, 2006, 2008
Netherlands	Test (A2)	Ceremony	2003,2007, 2010
France	Interview (A1)	Adherence to values	2003
UK	Test (B1)	Ceremony	2005

Source: (Goodman S. W., 2012a, p. 666), (Vink & Groot, 2010, p. 727)

As it can be seen, all these states on Table 4 introduced certain levels of knowledge and language requirements either in the forms of tests or interviews. All these new instruments were put into effect between 2000 and 2010, except the case of Austria which introduced the requirement firstly in 1999.

[15] These language level indicators correspond to a common scale: the Common European Framework of Reference for Languages (CEFR). The CEFR provides a standardization to comparatively assess the difficulty of national language levels. Levels are divided into three categories; A: basic speaker, B: independent speaker, C: proficient speaker. These divisions are further divided into six sub-levels. For more information on language levels, see: https://www.coe.int/t/dg4/linguistic/Source/Framework_EN.pdf

Moreover, using the data stated in Table 3 and 4, Goodman systematically interprets civic integration requirements over time and across cases with the index of CIVIX. This index is crucial because it categorizes and compares civic-integration policies by excluding other citizenship requirements such as the residency requirement. Thus, it allows a clearer picture of the impact of civic-oriented policies. Accordingly, a score is given to each country within a scope of 0 to 6; a high score represents "thick" citizenship content in which there are more barriers to citizenship and a low score indicates "thin" citizenship content with relatively few requirements for the access to citizenship. There are three areas of measurement of CIVIX scores; country knowledge, language, and values (Goodman S. W., 2010, p. 759).

As a result, Goodman came out with a typology for certain Western-European countries and their citizenship strategies whether they have prohibitive, conditional, insular or enabling policies (Goodman S. W., 2010, p. 764). Firstly, Germany, Austria, and Denmark are listed as prohibitive models; they all share differentialist citizenship traditions together with high barriers of citizenship tests and integration courses. Goodman sees this category of prohibitive states as the most expected and least surprising cases. Following this, states like Finland, Sweden, Ireland, and Belgium are considered as enabling states. These states enable integration instead of rewarding it and aim to develop a mechanism to establish equal status and rights attached to it for migrants (Goodman S. W., 2010, p. 765). Lastly, the Netherlands, the UK, and France represent the conditional category of states in which multicultural and assimilationist states can now be taken together. This model is the most unexpected one because these states have a liberal tradition of nationhood but imply strict civic integration requirements like the prohibitive states. Also, unlike enabling states, conditional states see and interpret integration as a reward (Goodman S. W., 2010, p. 766). Integration must be earned as a prize.

This categorization of Goodman's CIVIX results is criticized by Michalowski and Van Oers (2012) for two main reasons. The first criticism

addresses the fact that CIVIX results do not fully overlap with the 2010 results of MIPEX (Michalowski & Oers, 2012, p. 164). Within MIPEX, the "access to nationality" indicator is taken within the context of naturalization. It uses indicators of eligibility, conditions for acquisition, security of status, and dual nationality to calculate scores to find out the extent to which migrant inclusion is facilitated.

Table 5. Results of MIPEX and CIVIX

Countries	**MIPEX Scores**	**CIVIX Results**
Germany	66	Prohibitive
Austria	27	Prohibitive
Denmark	35	Prohibitive
Finland	61	Enabling
Sweden	73	Enabling
Ireland	57	Enabling
Belgium	62	Enabling
Netherlands	68	Conditional
UK	62	Conditional
France	61	Conditional

Source: (MIPEX, 2010), (Goodman S. W., 2012b, p. 181)

As the Table 5 shows, findings of MIPEX and CIVIX are inconsistent with each other. MIPEX scores of "access to nationality" point out the fact that Germany's score was higher than the scores of Finland, Belgium, the UK, and France (MIPEX, 2010). This means that, according to MIPEX, a country with a

traditionally exclusive state is less prohibitive compared to more liberal states when it comes to access to citizenship. However, CIVIX scores indicate Germany as a prohibitive country when Finland and Belgium are labeled as enabling and France as conditional states.

Relevantly, in states where there are strict civic-oriented policies like Germany, the Netherlands, and the UK, MIPEX scores are not the lowest in terms of access to nationality. Therefore, even though CIVIX reveals the civic integration scores for each state and the state with the more and stricter measure is evaluated as a prohibitive one, MIPEX results reveal that those states might still have a relatively higher level of access to nationality. In other words, it can be concluded that strict civic integration requirements do not directly act as barriers to citizenship. For instance, Belgium has an enabling citizenship policy according to CIVIX but MIPEX suggests that there is less access to nationality in Belgium compared to Germany. Thus, the results of two indices contradict with each other.

This contradiction is explained by stating that CIVIX does not consider objectives of these policies while measuring them. In other words, Goodman asserts that access to citizenship is affected by national citizenship legislations and therefore the purpose of civic integration is completely different for each country in accordance with its national citizenship understanding (Goodman, 2012b). Contrary to this idea, Michalowski and Van Oers (2012) argue that civic integration has brought exclusionary ambitions in the Netherlands, whereas Germany proved more liberal results in civic education (Michalowski & Oers, 2012, p. 170). Thus, they argue that analysis of civic integration policies necessitates the consideration of objectives and intents as well. Oversimplifications should not be made with the consideration of previous traditional integration models and the number of policies enacted starting with the 2000s.

This thesis agrees with Michalowski and Van Oers (2012) and argues that traditional integration models cannot directly determine the restrictive and

prohibitive role of citizenship policies anymore. Similarly, introducing more civic-criteria does not make a country's policy more restrictive. Goodman asserts that the measurement of these civic-oriented policies should entirely be empirical and non-normative and for this reason, CIVIX specifically attempts to see which states have more or less civic integration requirements compared to one another while MIPEX looks to find out the extent to which states provide migrants to achieve inclusion (Goodman S. W., 2012b, pp. 176,178). The intent, objective and content of integration policies have an impact on the result of citizenship and integration policies as well. Therefore, MIPEX results are more plausible for the scope of this thesis since it can be used in a complementary manner with the normative discussion of these policies.

Overall, the empirical evidence retrieved from secondary sources shows that various Western-European states started to practice civic-integration requirements between 2000 and 2010 in the forms of citizenship tests or interviews. In this sense, a policy convergence towards a more restrictive naturalization process is being observed. In order to assess the effects of these civic requirements in more detail, two Western-European states will be examined in the following chapter; the Netherlands and Germany.

A historical overview of migration, citizenship and integration policies of these two cases will be presented to understand the policy change. Later, normative and empirical assessments of civic policies will be made. First of all, the content of civic-requirements will be elaborated to a certain extent for their relevance with citizenship theories and to see if they include statements of cultural, racial, ethnic, or religious exclusion that can be associated with the "liberal paradox" debate. Second criteria will be based on the outcome of these policies. The aim is to see if these civic integration requirements actually acted as barriers towards naturalization and decreased the number of naturalized migrants due to their restrictive content.

CHAPTER 4

MIGRATION, INTEGRATION, AND CITIZENSHIP IN THE NETHERLANDS AND GERMANY

4.1. Explanation of the case selection

Both Germany and the Netherlands received labor migration starting with the 1960s, and have hosted a high number of guest-workers. By the year 2004, 4.3% of the Dutch population was born outside its borders and Turks constituted the largest group of non-nationals in the country. Similarly, 8.9% of the German population was born outside its borders and Turks constituted the largest group of non-nationals within Germany by 2004 (Eurostat, 2006).

By the start of the 2000s, the first civic integration policy was adopted by the Netherlands and later adopted by other Western-European states (Joppke, 2007a, p. 5). Germany was among those states who took the Dutch case of civic integration policy as an example (Jacobs & Rea, 2007, p. 265). The naturalization test that requires knowledge of the German legal system, commitment to Constitution, and language criteria highly resembles the integration policy of the Netherlands (Yanasmayan, 2009, p. 94). Similarly, it is stated that the segregationist Germany had adopted a kind of civic-integrationism in a way that it brought its citizenship and integration policy in line with its European neighbors, particularly with the Netherlands (Joppke, 2007a, p. 19). Thus, despite their different traditional integration models, Dutch multiculturalism and German segregationism, both countries attempted to practice civic-integration policies in various kinds of tests.

Fulfillment of these tests became prerequisites for citizenship acquisition in the same timeframe (2000-2010) for both states. Therefore, these Western-

European states will be analyzed in a comparative perspective to see objectives and outcomes of the civic-turn.

4.2. The Case of the Netherlands: Historical Framework of Migration and Integration Policies in the Netherlands

The Netherlands is the leading country that switched to a more restrictive civic-oriented integration policy by the end of the 1990s. This transition raised great controversy considering the fact that it has always been affiliated with the model of multiculturalism. The Dutch multiculturalism was based on the idea that cultural emancipation of minorities is the key to integration into the society, thus the purpose of multiculturalism was to institutionalize cultural pluralism to facilitate integration (Bertossi & Duyvendak, 2012, p. 239). Since civic-integrationism challenges the main assumptions of a multicultural society, the social and political transformation of this particular state will be examined in detail. For this purpose, Dutch perspective on migrant integration will be explained by touching upon its experience with post-colonialism and labor migration.

The Netherlands has been a country of both emigration and immigration. During the 17th century, it was an economic and cultural magnet with its rich cities like Amsterdam and this era was referred as the “Golden Age”. At the same time, it had become a country of emigration in the 18th and the 19th centuries because of its colonial movements in overseas. In the aftermath of these movements, it had once again become a country of immigration. Its post-colonial immigration was mainly from three sources (Maas, 2014, p. 261). The first major source was Indonesia; following the independence in 1945, Indonesians became the largest group of foreign-born residents. The next large migration flow occured with the independence of Suriname in 1975 and around one-third of Suriname’s population had immigrated to the Netherlands. The last source of post-colonial immigration was from small islands in the Caribbean, Netherlands Antilles that were colonized during the 17th century. Following the post-war decolonization,

islands like Aruba, Bonaire, Sint Maarten had become one of three sources of foreign-born residents in the Netherlands (Maas, 2014, p. 262).

Within the timeframe of the 17th and the 18th centuries, the Netherlands developed the tradition of "pillarization" which aimed at overcoming conflicts between Catholics and Protestants. Pillarization gave different religious groups the opportunity to create their own institutions. In other words, different groups were allowed to have their own sub-institutions for healthcare, education, social welfare and so on (Vasta, 2006, p. 4). Although the pillarization had ended with the secularization trend in 1960, the legacy of its structure continued to be found in various domains. In fact, the pillarization is argued to be the main cause of the Dutch multiculturalism (Bertossi & Duyvendak, 2012, p. 240). In other words, such system that allows different religious groups to preserve their own identities in their sub-groups had an impact on the Dutch multiculturalism stating that diversity is welcomed within the society. This legacy provided migrants to ask for their own facilities on the same conditions as the already established religions had. It resulted in the quick institutionalization of newly arrived religions of Islam and Hinduism as well (Penninx, 2005, p. 5).

Apart from postwar decolonization and the tradition of pillarization, the Netherlands experienced labor migration in a similar way to Germany. In order to meet labor demands resulted in the aftermath of WWII, recruitment agreements were signed with Mediterranean countries in the 1960s and with Turkey in 1964, Morocco in 1969, and Tunisia in 1970. The most crucial countries among them are Turkey, Morocco, and Tunisia because of their Muslim-majority population that started to increase rapidly. Relevantly, it was expected that male workers from these sending countries would come and work and then eventually return their home. Thus, labor migration was seen as temporary at the beginning.

4.2.1. Post-war Migration

The time between the post-WWII era and 1975 is regarded as a period of liberalization in which automatic acquisition to third-generation of migrants was introduced. Starting with 1965, a process of liberalization of the naturalization policy had started emphasizing on the right to a citizenship in the Universal Declaration of Human Rights (Oers, Hart, & Groenendijk, 2013, p. 6). Citizenship started to be seen as a right rather than a favor and three requirements became mandatory for each applicant; residence for a period of time, social integration into the society by having language skills, and demonstrating having no threat to public order (Oers, Hart, & Groenendijk, 2013, p. 7). It is important to see that the first impression of the civic-oriented language requirement dates back to the 1960s in the Netherlands.

Later on, the oil crisis in 1973 resulted in high inflation, recession, and unemployment. Consequently, new labor recruitment had ended and the government decided to limit the number of foreign workers. However, the majority of workers had stayed since the existing restrictions did not have the power to enforce them to leave (Entzinger, 1985, p. 64). Also, migration has continued with family reunifications since the Netherlands continued to practice relatively easy liberal admission policies allowing workers to bring their families (Entzinger, 1985, p. 57). In fact, the Turkish population in the Netherlands had grown much faster than the population in Germany because of this liberal system (Maas, 2014, p. 263). Therefore, the liberalization trend in Dutch nationality law resulted in the increase of naturalization numbers between 1974 and 1984 despite the economic recession.

In spite of the permanent intentions of migrants to stay in the Netherlands, there was the lack of efforts to develop a comprehensive integration policy. The post-colonial migrants were expected to integrate easily into the Dutch culture and society and guest-workers were assumed to return home without the need of an integration process (Vink M. P., 2007, p. 340). After it became apparent that most of the migrants are not residing temporarily, the Scientific Council for

Government Policy (WRR) published a report called “Ethnic Minorities” in 1979 suggesting the government should accept migrants as permanent residents and there should be policies aiming to facilitate equal participation of minorities (Geddes, 2016, p. 114). The Ethnic Minorities Policy resembled a systematic approach towards integration and a historic responsibility towards Turkish and Moroccan workers, Surinamese, Antilleans and Moluccans (Geddes, 2016, p. 114). It especially targeted specific groups that had low socio-economic conditions, primarily guest-workers (Penninx, 2005, p. 2). More importantly, this policy defined the Dutch society as multicultural and aimed to create awareness of this reality. In fact, the government started to work on giving more voice to migrant organizations. Relevantly, “intercultural education” courses were adopted in primary education for the whole society in which lessons of minority cultures were taught (Geddes, 2016, p. 114). Hence, there was a strong emphasis on how multicultural the Dutch society is and how it should be towards minority groups.

Following this, the 1985 Nationality Act aimed at strengthening the legal position of Dutch minorities while naturalization had begun to increasingly be perceived as a right rather than a favor (Oers, Hart, & Groenendijk, 2013, p. 13). In addition to this, the Dutch Nationality law was amended in 1986 and *jus soli* components were introduced. Following this development, second and third-generation migrants were granted the right to acquire Dutch citizenship without the requirement of renunciation of the previous citizenship by 1992 (Penninx, 2005, p. 3). This meant the right to dual citizenship for migrants. Consequently, naturalizations rates had continued to increase rapidly in the 1990s.

Throughout the 1990s, there was not a comprehensive and successful integration policy to comply with such easy naturalization policy. Without a restrictive integration policy, Muslim minorities had the chance to develop their own ‘Muslim pillar’ owing to the legacies of pillarization tradition of the Dutch integration policy (Vink M. P., 2007, p. 343). Therefore, together with increased naturalization numbers, and dual citizenship holders, the integration of migrants

started to raise controversies by the 1990s on whether to grant citizenship as a mean to encourage further integration or as an end for its successful fulfillment (Maas, 2014, p. 266). In fact, the renunciation requirement was re-adopted in 1997 observing that naturalization had become too easy (Oers, Hart, & Groenendijk, 2013, p. 45). Therefore, the consensus was on the idea that citizenship should not be an aspiration to encourage further integration. Instead, it should be seen as the goal at the end of the process.

In the aftermath of the guest-worker system in the post-war era, the Turkish population increased from 100 in 1960 to 191.500 in 1990. Similarly, the Moroccan population increased from 100 in 1960 to 148.000 in 1990. Later, there had been an overall decrease between 1990 and 2000 when the number of Turkish population decreased to 100.700 and Moroccan population to 119.700 (Statistics Netherlands, 2016)[16]. This can be explained by the new integration policy and the reacceptance of the renunciation requirement. In addition to colonial and labor migrants, the Netherlands was also one of the largest recipients of asylum applications in Europe by the end of the 1990s, especially from former Yugoslavia and Africa. Consequently, the number of asylum seekers had increased from around 1000 in the 1980s to around 50000 in the 1990s (Vink M. P., 2007, p. 340).

[16] For more detailed information on population please see: http://statline.cbs.nl/statweb/publication/?vw=t&dm=slen&pa=37556eng&d1=0-44&d2=1,11,21,31,41,51,61,71,81,91,101,111,l&hd=160114-1632&hdr=g1&stb=t

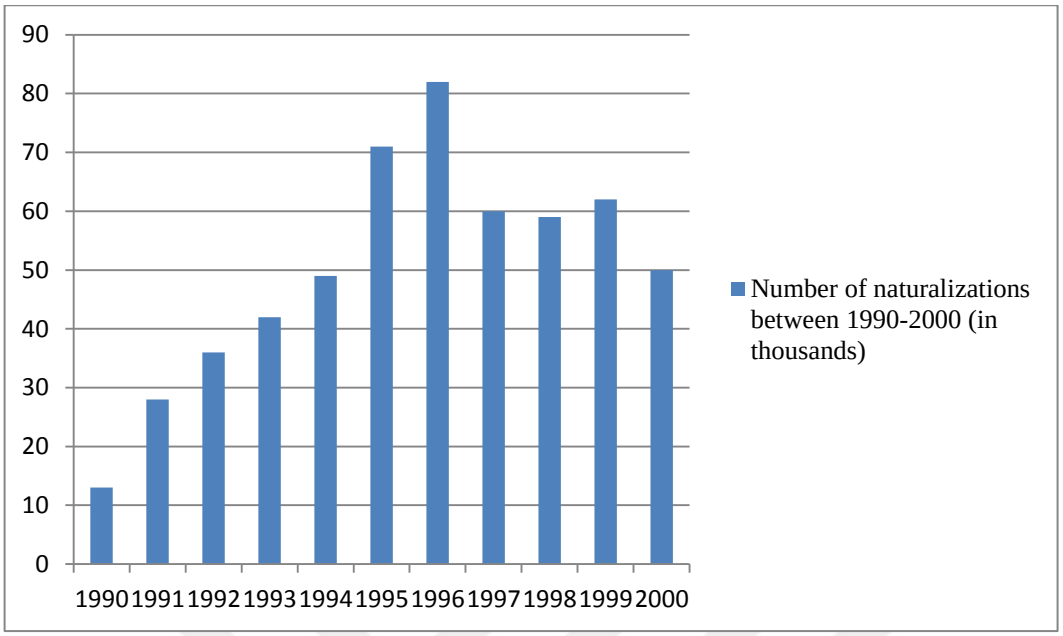

Figure 1. Number of Naturalizations between 1985 and 2000

Source: (Maas, 2010, p. 230)[17]

As Figure 1 illustrates, the naturalization numbers constantly increased between 1990 and 1996 and suddenly dropped in 1997. The increase can be interpreted as the result of the liberalization policy and the simplification of naturalization requirements without a comprehensive integration policy in the 1970s and the 1980s. 1997 identifies the year when the renunciation of other nationality had once again become a condition for naturalization. The second half of the 1990s was also the time when officials realized the need for a more efficient integration policy and introduced the 1998 Civic Act.

Overall, the period between 1970 until the late 1990s refers to the multicultural Dutch policy in which ethnic groups were allowed to set up their own organizations. The aim of this policy was to secure the equality for migrants by recognizing their own culture and identity (Carrera, Groenendijk, & Guild, 2013, p. 261). The pillarization tradition affected the facilitation of this multicultural policy. However, considering all these foreign-born residents, integration issues, and high rates of naturalization numbers, Dutch integration and

[17] The data were retrieved from the Dutch version of Statistics Netherlands by the author.

citizenship policy has begun to be re-shaped. In 1994, a new integration policy was introduced. It was based on the idea that integration should lead to the full and equal participation of groups and individuals in a society. This could be achieved by putting more emphasis on language courses, social orientation and vocational training (Vasta, 2006, pp. 6,7). As it can be understood, the Dutch integration policy started to prepare migrants for a republican understanding of citizenship which seeks for active citizenry and participation. The republican and communitarian emphasis on individual obligations and responsibilities to be a part of the society have gained importance. Also, signs of a civic-oriented integration policy had become clear in the first half of the 1990s together with language courses.

Following this, the Civic Integration of Newcomers Act (*Wet Inburgering nieuwkomers*) was introduced in 1998 (Slade, 2010, p. 130). This Act made it obligatory for migrants to take language and societal knowledge courses (Oers, Hart, & Groenendijk, 2013, p. 12). Non-EU nationals had to take 600-hour long Dutch language, civic education, and instructions on labor market courses for 12 months. This Act opened a completely new chapter for immigrant integration not only in the Netherlands but also in Europe. The view of granting legal status would eventually enhance integration has changed. Instead, Western-European states started to refuse admission and residence in case of lack of integration and therefore integration became a tool for migration control (Joppke, 2007c, pp. 249,250). Thus, there was an evident shift from a “minorities” policy of the 1980s to an “integration” policy by the end of 1990s. This was the first time migrants were actually seen responsible for their own integration and urged to attend these courses to prove their responsible behaviors.

4.2.2. The Civic turn in the Netherlands between 2000 and 2010

When it came to the 2000s, following the 9/11 terrorist attacks, the murder of the politician Pim Fortuyn in 2002 had a significant impact on the rise of anti-immigrant sentiments and gave rise to far-right politicians like Geert

Wilders. In 2003, a center-right coalition government came to power and declared that there will be a revision of the civic integration law in order to ensure migrants who wish to come to the Netherlands are aware of Dutch norms and values (Joppke, 2007a, p. 7). Immigration and the failure of integration became one of the issues that were discussed frequently in public debates. In 2003, a revised Dutch Nationality Act came into force with a Naturalization Test Decree stating that naturalization applicants have to pass a naturalization test. The test aimed to measure applicants' knowledge of Dutch society and whether they have the adequate level of language skills (Van Oers, 2013, p. 42).

As opposed to the idea of having a strong legal status would be enough to contribute to the integration process, citizenship as a legal status became the prize at the end of a successful integration process in the 2000s (Oers, Hart, & Groenendijk, 2013, p. 13). In the meantime, the republican turn of the integration policy in the 1990s shifted towards a communitarian understanding of citizenship which demands adaptation to Dutch norms and values that constitute a common Dutch identity (Penninx, 2005, p. 6). In other words, the Ethnic Minorities policy in the 1980s and 1990s symbolized a republican turn in Dutch citizenship policy, whereas the new Civic Integration Policy starting with the end of the 1990s and the beginning of the 2000s symbolized a communitarian turn emphasizing the identity aspect of citizenship.

The integration process had been handled at the municipal level until 2003 where a migrant was interviewed by a civil servant of his/her municipality. It was up to that civil servant to decide whether the applicant fulfilled the integration requirements (Groot, Kuipers, & Weber, 2009, p. 63). This practice changed in 2003 and migrants became obliged to pass two integration tests: the first test is a language test evaluating the Dutch language skills and the second test evaluates the applicant's knowledge of Dutch society and the state's constitutional order (Groot, Kuipers, & Weber, 2009, p. 64). The test was applied to residents for naturalization and to applicants who were living outside the Netherlands such as the spouses of Dutch nationals.

Later, the assassination of Theo Van Gogh by a Dutch-Moroccan citizen in 2004 led to a consensus that integration can no longer be stimulated under given conditions and divided Muslim minorities from the Dutch society (Mouritsen, 2015, p. 708). In fact, it is stated that the murder of both Pim Fortuyn and Theo Van Gogh resulted in the abandoning of the multicultural policy towards migrants (Odmalm, 2007, pp. 29,30). Following this, the Minister of Immigration and Integration of the time, Rita Verdonk, used this situation to justify new obligatory measures of integration and stricter naturalization policies (Penninx, 2005, p. 9). Polarization in public and political discourse had become more evident. Consequently, the revised civic integration policy was approved by the Dutch Parliament and came into force in 2006 by amending the Aliens Act 2000.

The new integration policy was called as the Civic Integration Abroad Act (*Wet inburgering buitenland*) (Slade, 2010, p. 131) and TCNs who wish to reside in the Netherlands were required to take an integration test in the Dutch Embassy or Consulate for a residence permit (Besselink, 2009, p. 246). The test was required even for a temporary residence permit. This new integration policy aimed at reducing the number of low-skilled and uneducated family migrants, especially Muslims of Turkish and Moroccan origin (Joppke, 2007a, p. 8). For instance; when a Dutch-Turk decides to marry someone from Turkey, the spouse cannot easily be granted a residence permit to enter the Netherlands. In this sense, it affects the family reunification of third-country nationals. This policy was argued to prevent semiliterate or illiterate people with low employment chances to arrive at the Netherlands and rely on social assistance (Entzinger, 2006, p. 131). Although the effects can mostly be seen on Muslim migrants, the Act has a universal character and is applied to all migrants (Orgad, 2010, p. 72).

The integration test costs 350 € and composes of two parts; the first part includes knowledge on the Dutch society. It comprises of questions regarding geography, history, culture, institutions, education, healthcare, economy, etc. In order to be prepared for this test, applicants are provided with an education pack

by the Dutch government.[18] There is a two-hour long film called "Coming to the Netherlands *(Naar Nederland)*" showing images such as homosexual men under the flag of the EU (Slade, 2010, p. 131). Although this image is designed to inform migrants about the daily life in the Netherlands, it was controversial because it was uncertain whether homosexually is a part of universally accepted constitutional norms and values and whether a consensus can be required from all individuals. Apart from homosexuality, the film introduces certain Dutch customs for migrants such as; leaving house curtains open and shaking hands with women. Even though the test is for all foreigners, it refers mostly to Muslim migrants in terms of its content (Joppke, 2007a, p. 15). The second part includes a test measuring the level of language proficiency. The applicants need to have the A1 level of Dutch (Besselink, 2009, p. 246). All in all, this act targeted newcomers to comply with certain strict requirements prior to entering the country.

This new Integration Act impacts EU nationals and non-EU nationals in a different way. As stated above, the Civic Integration Abroad Act states that foreign nationals who wish to form a family on Dutch territory have to take the integration examination in their home countries. If they fail to pass the test, they automatically lose their right to a residence permit. Although this Act does not specify a group of people who can be exempted from this policy, EU citizens are exempted from it in practice. First of all, EU law forbids further practices implied on EU nationals in terms of residence. In other words, due to the free movement of people within and among member states, EU citizens, irrespective of their nationality, are exempted from this practice. For instance, a Russian-speaking Latvian citizen who has no proficiency in Dutch language and Dutch society is exempted from this integration obligation by holding EU citizenship (Besselink, 2009, p. 249).

[18] The study pack is available on this website: https://www.naarnederland.nl/en/the-examination-package. The film is available at: https://www.naarnederland.nl/en/the-examination-package/filmen.

Secondly, the EU Family Reunion Directive (2003/86/EC)[19] urges member states to allow family reunification for third-country nationals (The Council of the European Union, 2003). Although it is a legislative act, it is up to member states to adopt its provisions. Discrimination occurs when it is combined with the Civic Integration Abroad Act because this Directive leaves the future implication of integration policy open only for non-EU nationals. Even those who obtained Dutch citizenship cannot make sure their families could arrive without fulfilling conditions stated in the Integration Act. Thus, this particular Directive creates negative discrimination on non-EU migrants, especially on Turkish migrants who live in the Netherlands (Yanasmayan, 2009, p. 89). Furthermore, Canada, United States of America (USA)[20], Switzerland, Australia, New Zealand, and Japan are also exempted from this civic integration policy due to bilateral agreements (Orgad, 2010, p. 72), (Besselink, 2009, p. 249). Thus, in terms of the Integration Abroad Act and family reunification, non-EU nationals are the most disadvantaged group while EU citizenship becomes a privilege for exemption. Although the policy seemingly has a universal character, the exemptions suggest the idea that the policy is not applied universally in practice.

The pass rate of this test is 87% which means most candidates pass the test at their first attempt, whereas it is argued that the test itself did not prepare candidates for full integration and participation into the Dutch society (Besselink, 2009, p. 246). In fact, it is argued that these integration policies can be considered as an instrument of migration law resulting in the exclusion of aliens rather than an attempt to integrate them (Besselink, 2009, p. 247). Lastly, the Dutch

[19] The EU Family Reunion Directive (2003/86/EC), Article 1: "The purpose of this Directive is to determine the conditions for the exercise of the right to family reunification by third country nationals residing lawfully in the territory of the Member States." Article 2(a): "'third country national' means any person who is not a citizen of the Union within the meaning of Article 17(1) of the Treaty". Article 4 (1): "The Member States shall authorize the entry and residence." Article 3(5): "This Directive shall not affect the possibility for the Member States to adopt or maintain more favorable provisions". For the original version please see: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:251:0012:0018:en:PDF

[20] USA is exempted under the clauses of "national treatment" and "most-favored nation" of the Treaty of Friendship. The official text is available at: https://www.expatax.nl/kb/article/official-text-of-the-dutch-american-friendship-treaty-daft-456.html

government does not provide any educational service abroad for applicants to get prepared in their home countries (Joppke, 2007c, p. 250). It is argued that the tests might be demanding but there should be enough resources for preparation in order for the tests to be less discriminatory and less anti-immigrant (Etzioni, 2011, p. 343). If integration has begun to be seen as a two-way street and migrants are obliged to take responsibility and pass these tests, states should also play their parts and provide adequate preparation opportunities. Thus, integration policy has become a tool for migration control aiming to restrict the number of family migrants who are seen as unskilled and non-adaptable to Western standards of living (Joppke, 2007a, pp. 5,8).

A year later, the "Civic Integration Act (*Wet inburgering*)"[21] was enacted in 2007. This Act is the next legal step of "Civic Integration Abroad Act (*Wet inburgering buitenland*)"[22]; applicants who passed that test abroad are now eligible and expected to fulfill the last step of integration. This Act replaced the 1998 Act on the Integration of new Immigrants and the previous naturalization test (2003) with a civic integration examination. The test is divided into two different tests; one for the Dutch language (A2 level) and the other for the knowledge on Dutch society. The costs for both tests were 270 €, and the naturalization fee was 351 € in 2010 (Groot, Kuipers, & Weber, 2009, p. 74). Since 2010, acquiring a permanent residence status became dependent on the successful pass of the integration examination and applicants became obliged to pay for the civic integration courses (Mouritsen, Meer, Faas, & Witte, 2015, p. 709).

Furthermore, unlike the 1998 Integration Act which only required participation in courses, the Civic Integration Act requires candidates for naturalization to pass both tests within three and a half years for those who already passed a test abroad or five years who have not taken any integration test

[22] The original Dutch names for two Integration Acts are used in order not to avoid confusion. "Wet Inburgering buitenland" refers to the integration test for those who live outside the Netherlands, whereas the "Wet Inburgering" is the main integration test prior to naturalization.

before (Besselink, 2009, p. 247). Failing at the test comes with a price; an administrative fine must be paid varying around 250€ to 1000€ (depending on the number of repeating of the test) and the candidate can no longer obtain the permanent residence status even after a legal temporary residence of five years. At this point, the integration policy can again be interpreted as an exclusionary immigration measure (Besselink, 2009, p. 248).

It is hard to assess the quality of this examination because the questions are not publicly available.[23] The absence of questions is a disadvantage for migrants because they cannot prepare themselves for the exam (Groot, Kuipers, & Weber, 2009, pp. 67,68). This policy change indicated that integration is a two-way street in which migrants should also have to change and adapt (Odmalm, 2007, p. 30). In a way, migrants became more responsible for their own integration. Even though the rhetoric of both of the Integration Acts supports the republican idea of duties and full participation, the effect of them on the integration of migrants has been negative.

Before the 2007 Act replaced the 1998 Act, around 30.000 people were participating in integration courses. However, only 7.148 people participated under the new Civic Integration Act at the end of the first year it was enacted and only 1.152 of these participated on a voluntary basis. This decline might be due to high costs of the Act; the obligation to attend courses, pass exams, and the risk of paying a sanction in case of a failure in tests (Besselink, 2009, p. 255). Overall, there are currently two Acts on immigrant integration in the Netherlands, the first is the "Act on Civic Integration Abroad" that entered into force on 15 March 2006 and the second one is the "Civic Integration Act" that entered into force on 1 January 2007. Both acts have an obligatory nature for those who want to permanently reside and eventually aim to become Dutch citizens.

Following the restrictive turn in the 2000s with these measures adopted for integration and naturalization processes, the pillarization perspective of the

[23] The Dutch test questions are not published and sample questions do not exist (Michalowski, 2010). Although the questions are not published, there are practice examinations available at https://inburgeren.nl/en/taking-an-exam.jsp.

Dutch integration policy ceased to exist. The first explanation for the end of pillarization tradition is the rightist turn in Dutch politics led by politicians like Pim Fortuyn, Geert Wilders, and Rita Vendork whose discourse moved from multiculturalism to repressive liberalism (Vink M. P., 2007, p. 343). The second argument related to the end of pillar system is that an "Islamic pillar" had never developed in the post-WWII immigration. Although policymakers realized the fact that guest workers are not temporary but permanent residents back in the 1970s, such understanding of allowing groups to preserve their own identity was eliminated (Vink M. P., 2007, p. 345). Thus, the multicultural idea of a traditional pillar system no longer allows migrants to preserve their own identities if it ever did. Instead, the civic-turn put the emphasis on the integration process of migrants.

The Dutch case is important in the sense that a traditional multicultural state had abandoned its multicultural agenda by the end of the 1990s. This shows that traditional integration models cannot be taken for granted, they are not static and subject to change and transform in accordance with internal and external factors. In this case, increased number of Muslim migrants and security concerns resulted in the introduction of civic-integration policies in the Netherlands. This new policy agenda has become a mechanism to cope with migration. Furthermore, this transition to civic-integration policies represented republican and communitarian citizenship theories in which migrants are obliged to learn the Dutch language, Dutch history, and culture.

4.3. The Case of Germany: Historical Framework of Migration and Integration Policies in Germany

After the civic-turn in Dutch civic integration policies, Germany adopted a considerably similar understanding of civic integrationism. Although there has been policy convergence in Germany's integration policy with the Dutch integration policy in the post-2000s era, Germany's historical integration and naturalization understanding were different. Germany's fundamental citizenship

understanding was based on its nation building process. In order to understand the policy change, Germany's traditional naturalization and citizenship understanding will be briefly examined from a historical-institutionalist point of view.

To start with, the Holy Roman Empire of German nation had survived until the 19th century and it had a great impact on the nationhood formation of Germany. The Empire lacked centralized institutions which could act as integrative powers among sub-states, thus a national consciousness was lacking among the people (Brubaker, 1990, p. 44). Due to the gap emerged between a supra-national Empire and sovereign and semi-sovereign states, and the lack of a common national consciousness within a political unity, an ethno-cultural concept of nationhood had developed (Brubaker, 1990, p. 45). There was not a shared notion other than the ethnic bounds based on *jus sanguinis* among the members of states. Thus, the blood-line was the fundamental commonality.

In the 19th century, German unification took place in 1871 under the rule of the Chancellor Otto von Bismarck. The timing of the unification was considerably late compared to most of the other European states. In order to close the gap, a sense of nationhood was tried to be created from above by Prussian reformers with the use of ethno-cultural sentiments. Hence, ethno-cultural unity became the expression of political unity in German nationhood (Brubaker, 1990, p. 42). This ethno-cultural nationhood can be explained by referring to a distinctive geography of Central Europe. The unified Reich (the German Empire) was both under-inclusive for not encompassing ethnic Germans in Austria and over-inclusive for involving French in Alsace-Lorraine, Danes in North Schleswig (Southern Denmark) and Poles in Prussia. Therefore, the Reich was considered as an incomplete state until the start of World War I (WWI) (Brubaker, 1990, p. 58). Looking at the diversified nations spread across Eastern Europe, one can understand the challenge of unification. In order to unify and develop a common sense of identity, German nationhood embraced the origin of blood, *jus sanguinis*, to determine the members of the state. German

understanding of citizenship was based on particularistic, differentialist, ethno-centric, segregationist elements of nationhood. Thus, German nationhood could only pass through descendants of German citizens (Brubaker, 1990, p. 41). This historical and cultural heritage continued to impact future debates on German citizenship.

In addition to this diverse geography and various nations, it is argued that Germany lacked a bourgeoisie revolution like the French did and the social and political developments were imposed from above through the Bismarckian legislation. The state emerged as the social guardian of people and these led to an environment where active citizenry could not develop and remained limited and restricted (Turner B. S., 1990, p. 206). German citizenship in this sense is a passive understanding of citizenship because the state is the only authority in the public sphere (Turner B. S., 1990, p. 207). Therefore, the passive understanding of citizenship and lack of revolutionary movements from below resulted in the continuity of ethno-cultural understanding of nationhood.

Last but not least, in terms of its history of migration, Germany was a country of emigration until the 1950s. It is estimated that around 7 million immigrants out of 45 million immigrants who arrived in the United States between 1820 and 1960 were German (Martin P. L., 1994, p. 196). Secondly, Germany was also a country of immigration by late 1800s and early 1900s, starting with its transformation from an agricultural to an industrial country. Accordingly, migration started from East Prussia with ethnic Polish Prussians to Ruhr area of Western Germany. By 1910, there were approximately 1.3 million foreigners constituting the 2% of the population (Martin P. L., 1994, p. 197). Due to its industrial stabilization, Germany did not experience significant emigration after the start of World War I (WWI) until the end of the 1920s (Bade, 1997 , p. 8). The emigration re-started after 1933 with the flight of refugees under Nazi Germany. The number of refugees from German-speaking countries between 1933 and 1945 to other countries was estimated to be over half a million and they were mostly constituted of Jews (Bade, 1997 , p. 9). Therefore, starting with the

19th century, Germany was a country of both emigration and immigration. Starting with the mid-1950s, Germany started a new chapter in its migration history by hiring foreign workers.

4.3.1. Post-war Migration in Germany

After the WWII, the Federal Republic of Germany was founded on 1949. The Republic felt the need to re-structure its economy in the post-war era and due to the demographic change and labor shortages resulting from the war, it began to conduct bilateral agreements between 1955 and 1968 with Italy, Spain, Greece, Turkey, Morocco, Portugal, Tunisia, and Yugoslavia. This has become known as the "guest-worker system". There were 329.000 foreign workers in 1960. By 1964, there were 1 million guest-workers and it increased to 2.6 million in 1973 (Martin, 2004, p. 9). Despite the increasing numbers, the guest-worker system had a temporary understanding as the word 'guest' suggests. Migrants were expected to work for a period of time and return home afterwards. Thus, the system aimed to add workers into the labor force instead of adding settled citizens into the population (Martin, 2004, p. 10). This temporary character resulted in the lack of social mechanisms to develop integration policies (Okyayuz, 2012, p. 234). Nevertheless, immigration continued rapidly and the non-German population reached 2.600.600 by 1970 (Kaya, 2012, p. 42).

In 1973, the oil crisis and the recession in the market resulted in the end of the recruitment of new workers. It was also the time when the German state began to realize that guest-workers are not temporary residents but are permanent (Martin, 2004, p. 11). In spite of the end of the recruitment period, the number of migrants continued to increase throughout the 1970s and the 1980s with family reunification. Starting with the 1990s, immigration continued with individual asylum applications. Furthermore, with the end of Cold War and the collapse of Berlin Wall, Germany began to receive immigrants, mostly ethnic Germans, from the former Soviet Union in the early 1990s (Kaya, 2012, p. 40). Therefore,

despite the lack of a comprehensive integration policy and expectations for return, the foreign population continued to increase in Germany.

Throughout the 1990s, the existing naturalization policy was accepted as a failure and acknowledged as the most serious deficit of post-national immigrant integration (Joppke, 1999, p. 199). Until 1999, citizenship acquisition was defined by Article 116 of the Basic Law which was based on the 1913 Imperial and State Citizenship Law. According to the law, a German is a person who possesses German citizenship or is the spouse or descendant of that person (German Bundestag, 2014). It can be clearly seen that the citizenship has an ethnic understanding which can be transferred through *jus sanguinis*; the rule of blood. It is exclusive for non-ethnic Germans.

This ethnic-oriented law became impractical by the 1990s because while the remaining ethnic-Germans[24] arriving in Germany after the Cold-War who had only little German but granted citizenship automatically, German-Turks who were born in Germany, permanent residents, and speak German were not granted citizenship (Howard, 2012, p. 43). Joppke explains this issue as; Germany had *de facto* foreigners automatically accepted as Germans and *de facto* Germans who are classified as foreigners (Joppke, 1999, p. 200). Therefore, this strict emphasis on *jus sanguinis* needed to change in order to liberalize the existing citizenship law. For this reason, citizenship law was amended in 1999 under the coalition of left-wing Social Democrats (SPD) and Greens and came into force in 2000.

The 2000 Nationality Act decreased the residence requirement from 15 years to 8 years, allowed conditional dual citizenship, and introduced *jus soli* principles for the first time for children who were born on German territory. It is argued that the shift to *jus soli* principle was because of the changing perspective on migration (Möllering, 2010, p. 154). Germany could no longer ignore the foreign population who were permanent residents. This new law marked a notable change after decades of traditional exclusion based on ethnic criteria

[24] Ethnic-Germans are people who have German ancestry in Eastern Europe or the former Soviet Union.

(Howard, 2012, p. 48). Nevertheless, it is argued that the 2000 Citizenship Law brought liberalization and restrictive backlash at the same time (Howard, 2012, p. 42). For this reason, the civic measures that were introduced right after the liberalization require further examination.

4.3.2. The Civic Turn in Germany between 2000 and 2010

The 2000 Nationality Law did not only liberalize residency and bring *jus soli* elements but also introduced two civic components for naturalization for the first time. It required sufficient knowledge of German and an inner orientation towards Germany by acknowledging the free and democratic order of the country (Van Oers, 2013, p. 62). Howard (2010) explains the restrictive turn in the aftermath of liberalization with the anti-immigrant public opinion. According to him, a liberalization trend can only occur as long as public mobilization is not activated.[25] The liberalization is blocked when there is a successful political party, and anti-immigrant sentiments are politically mobilized (Howard, 2010, p. 744). Accordingly, when the public was involved, the liberalization was blocked in Germany in post-2000s (Howard, 2012, p. 49). Moreover, political parties of Christian Democratic Union (CDU)/ Christian Social Union (CSU) declared after the 9/11 attacks that it is important to make use of the naturalization process to exclude terrorists from obtaining German citizenship (Van Oers, 2013, p. 67). Thus, although Germany did not experience incidents like the Netherlands did with murders of Pim Fortuyn and Theo Van Gogh, security concerns had an impact on political discourse regarding integration and naturalization policies. The right-wing political parties had the opportunity to justify their positions by using the security agenda on the threat of terrorism.

Three years after the liberalization in 2000, Act on the "Regulation and Limitation of Immigration and of the Regulation of Residence and Integration of

[25] Germany, Finland, Sweden had center-left governments and the Netherlands had the left-wing Social Democrats in its grand coalition at the time the liberalization reform on citizenship law had passed (Howard, 2010, p. 744).

Union Citizens and Immigrants" (Immigration Act) amended the 2000 Nationality Act and entered into force in 2005 (Kaya, 2012, p. 51). This Act particularly emphasized on integration requirements; knowledge of German language became the main aim of a successful integration policy. Accordingly, the law adopted the Dutch example of integration courses and introduced 600 hours of language education and 30 hours of civic education (Van Oers, 2013, p. 67). The integration courses were already being applied to ethnic-Germans under the *Aussiedler Policy*.[26] However, together with the civic-turn, the scope of integration courses was extended to non-ethnic, non-EU Germans so both groups began to attend the same courses (Joppke, 2007a, p. 12). Only those who successfully attended the courses and obtained a B1 level of German would obtain a permanent residence permit (Van Oers, 2013, p. 67). Hence, residence became linked to integration.

Unlike the case in the Netherlands, although participation in integration courses is obligatory, it is stated that no sanctions can be implemented in case of non-attendance (Joppke, 2007a, p. 13). However, the 2004 Immigration Law states that all foreigners who are residents of the Federal State of Germany on a permanent basis are obliged to attend integration courses (The Bundestag, 2004).[27] In case the foreigner does not attend the obligatory courses, the institution may reduce the benefits foreigners receives throughout the period of non-attendance. If the foreigner does not attend at all, the costs covering the fee of the courses might be reimbursed from the foreigner (The Bundestag, 2004)[28].

[26] *Aussiedler* Policy is also known as the open-door policy between 1988 and 1992. Ethnic Germans are referred primarily as Poles and Russians arriving from Eastern Europe and former Soviet Union. Article 116 of the Basic Law refers to them as " A German is a person who has been received in the territory of the German Reich as of 31 December 1937 as a refugee and expellee…or former German citizens who were deprived of their citizenship on political, racial or religious grounds." (Deutscher Bundestag, 2014) https://www.btg-bestellservice.de/pdf/80201000.pdf.

[27] See Section 44, "Entitlement to attend an integration course", https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/residence_act_germany_en_1.pdf

[28] See Section 44a(3). (2004). "Obligation to attend a course", https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/residence_act_germany_en_1.pdf

Therefore, the sanction only includes the fee that has been paid for the foreigner's costs. An extra amount of a sanction fee is not asked despite the obligatory nature of the course. Moreover, the conservative right-wing CDU/CSU parties wanted negative sanctions on migrants on the basis of a "user pays" idea, whereas the left-wing SPD and Greens opted for positive sanctions asking the federal government or the Länder[29] to pay the fines in order to motivate and support migrants (Joppke, 2007a, p. 13).

Moreover, contrary to the Integration Abroad Act of the Netherlands, the sanctions deriving from integration courses in Germany have no effect on family reunifications. The Länder have no discretionary power on family reunification, it is protected by the Constitutional Law. Thus, the stricter application of integration policy does not have a negative effect on family members (Joppke, 2007a, p. 14). However, these differences do not mean that German integration policies are not controversial. The 2000 Nationality Act introduced the language and loyalty criteria and allowed the Länder to decide on their own practices. The application of these requirements showed differences among Länder and two of them, Baden-Württemberg and Hesse, had introduced highly controversial integration measures.

In early 2006, the Minister of Interior of Baden-Württemberg introduced an interview guideline (*Gesprächslietfaden*) to examine applicants for naturalization. The aim was to assess applicants' commitment to the "German free democratic basic order" (Orgad, 2010, p. 66). The test did not have a universal character unlike the "Act on Civic Integration Abroad" in the Netherlands. The test was only applied to Muslim applicants coming from 57 Muslim states who are members of the Organization of Islamic Conference; therefore it was referred as the "Muslim test" (Groot, Kuipers, & Weber, 2009,

[29] Since Germany is a federal state, Länder can only use their administrative guidelines with the consent of "Bundesrat" until federal policies are adopted. These policies and guidelines are binding on the Länder (Hailbronner, 2006, p.239 retrieved from Van Oers, 2013, p.58).

p. 59; Rosenow-Williams, 2012, p. 361; Goodman S. W., 2014, p. 134).[30] The test was later amended in 2007 and gained a universal character but continued to refer Muslims with its content. The test was conducted in the form of an interview while a civil servant takes notes of the reliability of the applicant's answers (Groot, Kuipers, & Weber, 2009, p. 59).

It was composed of thirty questions aiming to measure the applicant's acceptance of liberal democratic values. Some of the questions can be given as such: "Imagine that your adult son comes to you and explains that he is homosexual and would like to live together with another man. How do you react?" (BBC , 2006) or "In Germany, sport and swim classes are part of the normal school curriculum. Would you allow your daughter to participate?" (Hawley, 2006). The questions had a sharp distinction between liberal values and Islamic ideas including subjects such as; arranged marriage, patriarchy, homophobia, and terrorism (Joppke, 2007a, p. 15). Thus, the test targeted Muslim migrants and their interpretation of liberal values through these controversial questions. These questions are considered controversial because they do not fit into the Rawlsian understanding of political liberalism.

Josef Winkler, Bundestag representative of the Greens argued that the test itself is unconstitutional and violates the right of freedom of opinion. The test was argued to target subjective orientation and attitudes of the applicant, rather than facts and knowledge (Hawley, 2006). As opposed to him, the test gained support from the CDU member Heribert Rech. He asserted that migrants were asked to demonstrate the extent to which they know about the Constitution, whereas it is even more important to learn what they believe and identify themselves with (Hawley, 2006). This statement of the CDU member is against the liberal understanding of Orgad (2010). Migrants in this sense should not be obliged to agree with certain values but expected to accept them. In other words, when tests

[30] Interior Ministry of Stuttgart stated that all Muslims are suspects and therefore this test applies to them to test their inner thoughts. For more information see: http://www.sueddeutsche.de/politik/baden-wuerttemberg-alle-muslime-sind-verdaechtig-1.785482

assess personal beliefs and moral judgments, they contradict with political liberalism (Orgad, 2010, p. 66). The test had a strong assimilationist view and it attempted to assimilate Muslim migrants into the German society. As a consequence of such practice, Baden-Württemberg was the only state whose naturalization numbers decreased among other Länder in Germany in 2006 (Groot, Kuipers, & Weber, 2009, p. 60).

A similar integration policy was adopted following the Baden-Württemberg example in the federal state of Hesse in 2006. A new naturalization test was introduced with one hundred questions[31] on nine subjects that are: Germany and Germans, German history, geography, institutions and elections, federal states, human rights, culture, national symbols, and science (Orgad, 2010, p. 67). Although this test was less controversial compared to that of the Baden-Württemberg and it could not enter into force, it involved certain common elements of history such as the Reformation, the Holocaust and constitutional values of freedom of speech, thought, religion, etc. It also expected applicants to know the German way of life, famous German authors, musicians, philosophers as part of the German culture.

However, there were also cultural questions such as; "Should a woman be allowed in public without the company of a close male relative?" (Orgad, 2010, p. 68). Thus, the naturalization test in Hesse was mainly composed of factual knowledge but still included questions that are seeking to learn personal beliefs and the internal dispositions of applicants. For that reason, it was found contrary to the understanding of political liberalism to a certain extent. Also, a fear of "naturalization tourism" emerged because of different applications of integration requirements by different Länder. Consequently, a Federal Test in 2008 replaced the tests in Baden-Württemberg and Hesse in order to uniform naturalization requirements.

[31] The full list of questions can be found here:
http://www.spiegel.de/international/becoming-german-proposed-hesse-citizenship-test-a-415242.html

The Federal Naturalization Test is being carried out by the Federal Office for Migration and Refugees (BAMF).[32] Questions' subject areas are determined as "Living in a democracy", "History and responsibility" and "People and society".[33] It mainly focuses on geography, history, constitutional principles, national symbols, and German customs (Orgad, 2010, p. 68). The test includes thirty-three questions, and at least seventeen of them needs to be answered correctly (Deutsche Welle, 2008). Furthermore, thirty out of thirty-three questions are within the area of civic knowledge and can be outlined as: "Living in a Democracy", "History and Responsibility", "People and Society" (Möllering, 2010, p. 153). The questions include samples as such: "What is the duty of opposition in the German Parliament?", "When was the Federal Republic of Germany founded?", "Why did former Chancellor Willy Brandt kneel down in the former Warsaw Ghetto in 1970?"

These questions aim to assess the migrants' knowledge and understanding of German society. They do not investigate the conscience of applicants like the test in Baden-Württemberg did. Each Länder has to use these same questions but they can additionally ask current governors and capitals of their own federal state (Spiegel, 2008). Furthermore, all sample questions and their answers were made publicly available by the Federal Ministry of the Interior. In fact, the detailed information was made available in English on the website of the BAMF, including the Nationality Act (Groot, Kuipers, & Weber, 2009, p. 72). The citizenship test costs 25 € but the naturalization application fee is 255 € (Groot, Kuipers, & Weber, 2009, p. 74).

Although the Federal Test is being used on behalf of separate Länder tests, it is the responsibility of Länder to administrate the naturalization process.

[32] The Office (Bundesamt für Migration und Flüchtlinge in German) provides assistance on issues like residence and work permits, education, naturalization, asylum and refugee protection and voluntary and non-voluntary return from Germany. For more information see http://www.bamf.de.

[33] Detailed information can be found at: http://www.bamf.de/EN/Willkommen/Einbuergerung/WasEinbuergerungstest/waseinbuergerungstest-node.html

Local naturalization authorities are responsible for informing applicants about the requirements of citizenship acquisition including language proficiency and proof of civic knowledge through the test. Accordingly, the tests are administered by naturalization test centers, in adult education centers (Möllering, 2010, p. 153). Therefore, although there is standardized naturalization test for all Länder, each of the Länder has the competency to administrate the test on its own. If states still want to require additional questions for migrants, those questions[34] should also be based on basic factual knowledge.

The Federal test is implemented as a supplement of existing naturalization requirements (Deutsche Welle, 2008). Passing the naturalization test alone does not guarantee citizenship acquisition; applicants still need to fulfill the rest of the criteria in the Nationality Act amended in 2007. Apart from the naturalization test, the amended German Nationality Law states that applicants need to fulfill requirements of eight years of residence[35], ability to support oneself without needing assistance, clean criminal record, commitment to the constitutional principles of Germany, and B1 level German language proficiency (Federal Ministry of the Interior, 2017). Applicants can demonstrate their language proficiency through various ways; presenting a certificate of BAMF obtained through the successful completion of a language course that is a part of the integration course, successful completion of *Zertifikat Deutsch*[36] or above, presenting a school certificate from a German school or a degree from a German-speaking University (Möllering, 2010, p. 151).

The commitment, on the other hand, is proved with a written document stating that a declaration of loyalty is made to the rule of law, democracy, human

[34] Three out of thirty-three questions are intentionally left for Länder to decide (Möllering, 2010, p. 153).

[35] It became possible to decrease the residence requirement from eight years to seven years in case of the successful completion of the integration course. In fact, it could even be reduced to six years if the applicant can demonstrate high skills of German language (Wiesbrock, 2009, p. 307).

[36] *Zertifikat Deutsch* is the internationally recognized language certificate of Germany and it corresponds to B1 level of German skills in the Common European Framework of Reference for Languages.

rights, and other values. Moreover, spouses of German citizens are allowed for naturalization only if they comply with the German way of life (Orgad, 2010, p. 68).[37]

The amendments in 2007 also brought the requirements of knowing the legal system, the society and living conditions in Germany. These requirements can be fulfilled with the integration test (Wiesbrock, 2009, p. 307). Furthermore, after the amendment to the Residence Act in 2008, the spouse who applies for family reunification should demonstrate language skills (A1 level) before she arrives at the country like the policy in the Netherlands (Wiesbrock, 2009, p. 304). However, it does not include a separate integration test and the language courses are provided by the "Goethe Institute" and broadcasted by the German public broadcaster "Deutsche Welle" (Groot, Kuipers, & Weber, 2009, p. 63; Joppke, 2007a, p. 8).

Taking these developments on German integration and naturalization policies into account, it can be argued that these tests reflect German culture and the expected German way of life. Thus, despite a Federal Test replaced separate tests of the Länder, questions still reflect the *Leitkultur* of the German way of life (Miera, 2007, p. 6; Orgad, 2010, p. 70). *Leitkultur* refers to the dominant or leading culture of Germany. Therefore, it is a term used to define "Germanness". Alternatively, the term can also be referred as the "core culture" corresponding to norms and values defining European cultural community (Möllering, 2010, p. 151). It is argued by left-wing parties that the term might be used for exclusion of migrants, whereas right-wing parties support the idea that the term resembles the need for migrants to assimilate into German culture rather than integrate (Hawley, 2006; Erdoğan, 2006).

Although the mainstream German culture is a vague term, Angela Merkel referred to German *Leitkultur* by saying "Anyone coming here must respect our

[37] Orgad gathered the information from the German Nationality Act which can be found at the website of Federal Ministry of Interior: http://www.bmi.bund.de or from EUDO Citizenship's website: http://eudo-citizenship.eu/databases/national-citizenship-laws/?search=1&year=&country=Germany&name=nationality&page=1.

constitution and tolerate our Western and Christian roots". In addition to this statement, Chancellor Gerard Schroeder declared that German society cannot tolerate parallel societies, and therefore, immigrants must respect and acknowledge the German way of doing things within a democracy (BBC, 2004). Therefore, the Federal Test defines the framework of civic-integration requirements by emphasizing history, geography, law and institutions, and German culture at the same time.

All in all, Germany was known for its ethno-centric, segregationist model of citizenship. As the result of post-war migration and increasing number of foreign nationals permanently residing in Germany, and the lack of a comprehensive integration policy, it liberalized its citizenship law in 2000. However, this liberalization brought further civic conditions which resembled the Dutch Integration Act. Consequently, Germany adopted a civic-territorial conception of citizenship (Yanasmayan, 2009, p. 95). This conception of citizenship is reflected on the current civic-oriented naturalization test. By 2010, Chancellor Angela Merkel declared that multiculturalism in Germany had failed and the idea of people from different cultural backgrounds living together did not work (Weaver, 2010). This expression gives the impression that restrictive trend might continue in integration and naturalization policies.

As a result, it can be seen that both states introduced similar civic-integration policies within the timeframe of the late 1990s until 2010. The most crucial policies in this table are the 2006 Civic Integration Abroad Act and 2007 Civic Integration Act of the Netherlands in the Netherlands and the 2008 Residence Act and 2008 Naturalization Test of Germany. These are the latest policies enacted and they lay out the main characteristics of civic-integration understandings in both states.

Certain notable differences can be given as such; the Netherlands demands an A1 level of Dutch language and integration test from migrants abroad, whereas Germany does not require an integration test but an A1 level of German for a residence permit. Moreover, The Dutch citizenship test requires an

A2 level of language skills when the German test requires the B1 level. In both cases, the permanent residence status is dependent on the successful completion of integration tests. Therefore, both states apply identical policies with small differences. The content and outcome of these policies will be examined in the next chapter in more detail.

CHAPTER 5

ANALYSIS OF CIVIC-INTEGRATION REQUIREMENTS IN THE NETHERLANDS AND GERMANY

A discussion between cases of the Netherlands and Germany will be made within the framework of Chapter 2 and Chapter 3 which means that it would include normative and empirical debates concerning the objectives and outcomes of citizenship tests. The normative discussion elaborates on these tests by trying to find out which citizenship theory explains them better, and whether they comply with political liberal assumptions. The empirical discussion aims to examine the extent to which these policies acted as barriers for naturalization in these states and if that is the case, which minority groups are affected the most.

As it is stated in the introduction of this thesis, this chapter has a limitation regarding the content of the citizenship tests. The content of the citizenship tests is not fully publicly available.[38] Therefore, the discussion in this chapter is only based on secondary sources and a limitation exists on the interpretation of questions. There are several studies in the academic literature focusing on the intent and content of these tests (Michalowski, 2011; Michalowski, 2010; Van Oers, 2013; Orgad, 2010; Bauböck & Joppke, 2010). The aim of this thesis is to interpret on selected questions that are already accessed, translated, and analyzed by scholars to see which citizenship theory

[38] The Dutch test questions are not published and sample questions do not exist, the data were derived from the curriculum for the test which contains a list of 310 "important-to-know" bullet-points by scholars who analyzed them (Michalowski, 2010, p. 5; Van Oers, 2013, p. 101). Although the questions are not published, there are practice examinations available at https://inburgeren.nl/en/taking-an-exam.jsp.
The German Naturalization test is publicly available only in German language. The complete list of the Naturalization Test can be accessed at:
https://www.gesetze-im-internet.de/bundesrecht/einbtestv/gesamt.pdf or http://www.deutsch-werden.de/pdf/allgemeine-300-fragen.pdf.
The questions of the Baden Württemberg test is retrieved from secondary sources as well.

explains which test in a more comprehensive way and the extent to which these selected questions comply with liberal norms and values. Thus, considering the scope and the extent of this thesis, the aim is to refer to each civic-test to give an overview of the changing perceptions of citizenship understandings between 2000 and 2010 in these two states. The priority is to evaluate citizenship theories and liberal assumptions within the context of citizenship tests.

5.1. The Discussion on the Normative Aspects of the Civic Turn

The normative assessment of civic-integration policies in the Netherlands and Germany relies on two aspects; citizenship tests and their compliance with three citizenship theories that were discussed in Chapter 2, and their relevance to the debate on "liberal paradox" discussed in Chapter 3 of this thesis. Since it is not possible to examine each question that is being asked either in interviews or tests in this study, this thesis will use existing studies of secondary sources that investigated the content of these tests.

First of all, there are four main thematic categories that help to examine the questions: (a) rights, freedoms, and duties, (b) democracy, (c) cultural differences, (d) general knowledge of the country (Michalowski, 2011; Van Oers, 2013). Each category can be affiliated with three citizenship theories that were discussed in Chapter 2. To simply put, liberal citizenship is the right-based understanding of citizenship that supports equality and freedom according to Rawlsian political liberalism and therefore looks for the thematic category (a) rights, freedoms, and duties, republican citizenship is the active citizenship understanding that is close to the categories of (b) democracy and (c) cultural differences, and the communitarian citizenship is the membership understanding of citizenry emphasizing on the identity aspect which can encompass all thematic categories but most dominantly (c) cultural differences. Since defining identity is hard, a communitarian test can encompass all kinds of questions justifying them with regards to the definition of identity. Lastly, the last thematic category of (d) general knowledge of the country can be justified by all three theories.

Secondly, according to this classification, only the questions that ask about "what is right" and factual knowledge can be considered as liberal within citizenship tests. This factual knowledge should be about political knowledge like law and institutions and avoid questions on country's cultural practices and traditions (Hampshire, 2011, p. 967). It can also encompass *sine qua non* principles and values that are embedded in that country's constitution rather than moral judgments (Orgad, 2010, pp. 103, 104). Otherwise, tests can be framed as "illiberal" as explained in Chapter 3. Furthermore, a test must first be justified as liberal in order to further include republican and communitarian notions. This is the point where civic-integration policies in general and content of citizenship tests in particular in both states remain controversial. That raises the question: How liberal are citizenship tests in the Netherlands and Germany?

Taking these thematic categories and discussion on the liberal paradox into consideration, several questions from tests can be examined. Starting with the Dutch case, the most prominent examples are from the "Integration Abroad Test" that asks migrants whether they accept homosexuality, nudity, and gender equality in the Netherlands. The video shortage presents migrants scenes of leaving house curtains open and shaking hands with women as part of Dutch customs (Orgad, 2010a, p. 72). The test clearly targets the Muslim audience despite its universal character. This test can be considered as falling under the thematic category of (c) cultural differences and (d) general knowledge of the country. Thus, it can be interpreted with the communitarian theory of citizenship. Since this test involves questions asking for inner dispositions and beliefs rather than factual knowledge, it can be accepted as "illiberal" by the given examples.

In addition to this, the current integration test asks questions like "How "wrong" is it when an immigrant visits the widow of a deceased co-worker instead of sending a card?" The purpose of this question with regards to liberal norms and values are unknown (Orgad, 2010a). However, this question does not seek inner dispositions of a migrant, it simply asks about Dutch traditions in case of a loss. Also, another question asks: "What do you do if you see two men

kissing?" and the answers are followed as such: "ignore them", "call the police" or "tell them to go home" (Dutch News, 2016). These questions are also related to thematic categories of (c) cultural differences and (d) general knowledge of the country. Similarly, these are mostly connected to the communitarian citizenship theory.

For the case of Germany, some examples from the Baden-Württemberg test can be given to understand the rhetoric of the test even though it is no longer in force. Questions include; "Imagine your son tells you he is homosexual, how would you react?", "Your daughter and your spouse want to dress like German women. Would you prevent it? If yes, why?", "Some people believe Jews are behind 9/11 attacks. Do you believe in such statement?" (Orgad, 2010a, p. 67), "What is your view on honor killings and arranged marriages?", "Is it right for men to beat their wives when they are disobedient?", "Would you have problems to accept a woman as a person of authority?" (Groot, Kuipers, & Weber, 2009, p. 59). These are a few of the examples out of thirty questions of the oral exam. As it can be seen, these questions are related to gender equality, religion, and culture in general. Thus, like the Dutch case, they are referring to the thematic category of (c) cultural differences. It can be argued that this test had a strong communitarian citizenship emphasis. With reference to the debate on illiberal liberalism in Chapter 2, these questions refer to inner dispositions rather than knowledge based facts, they seek to find out what is good rather than what is right, and they are not universal principles guaranteed by the Constitution.

Continuing with the questions from the 2008 Federal Test in Germany, they include: "What is the duty of opposition in German Parliament?", "When was the Federal Republic of Germany founded?", "Why did former Chancellor Willy Brandt kneel down in the former Warsaw Ghetto in 1970?", "What do Germans traditionally do at Easter?" (Speigel, 2008). Others are: "What is the German constitution called?", What is the emblem of Germany?", "How many

Federal states does Germany have?" (BBC, 2008).[39] These questions aim to assess migrants' knowledge and understanding of German society and the German Federal Republic and they do not investigate the conscience of applicants. Therefore, it is clear that majority of questions are related to the thematic category of (d) general knowledge of the country and (b) democracy to a certain extent. The question related to the Easter holiday can be viewed as (c) cultural differences. It can be argued that the current test has a strong republican emphasis on citizenship but also includes liberal and communitarian perspectives of citizenship theories.

The difference between the Dutch perspective and the German perspective can be reflected with a more specific example. German test asks the question of "Who is not allowed to live together as a couple under German law?" is related to legal rules, whereas the questions and clauses regarding the "same-sex marriages" and "the way women dress is not inviting" are about social norms and lifestyles in the Dutch test (Michalowski, 2010, p. 6). Hence, the German understanding of citizenship tests is more close to republican citizenship theory, whereas the Dutch understanding of citizenship is more related to communitarian citizenship theory in this example. In this case, German test can more easily be accepted within political liberalism. It is also crucial to see that Germany as a former-segregationist state has a more republican-oriented citizenship test, whereas the former-multicultural Netherlands has a more communitarian influence in its tests.

However, it should be noted that communitarian citizenship does not specify a certain culture and thus it also involves several aspects of both liberal and republican citizenship. For instance; if a test asks about law and institutions as a liberal test would ask, it can still be interpreted with communitarian citizenship since institutions can be regarded as a part of a common culture/identity. Similarly, a republican citizenship theory demands questions on general knowledge and history of a country for a better participation chance of

[39] The full list of questions can be reached at http://news.bbc.co.uk/2/shared/bsp/hi/pdfs/04_09_08_germancitizenshiptest.pdf.

the applicant and it would still be justifiable from a communitarian point of view because these are parts of a common culture/identity as well. Therefore, for both the Netherlands and Germany, it can be argued that citizenship tests are justifiable from a communitarian citizenship point of view even though Germany has more liberal and republican elements in its latest Naturalization test. Also, since these examples are limited and illustrate only a small part of these tests, simplifications should not be made for both states. These questions only give an impression that republican and communitarian understandings of citizenship can be observed in civic-tests in the Netherlands and Germany.

When it comes to these communitarian tests' compatibility with liberal norms and values, contrary to all criticisms and controversies, Randall Hansen (2010) argues that these tests are not only liberal but also desirable. According to him, it is these hurdles behind the citizenship that makes it highly valuable. When citizenship is acquired relatively easier as it is the case in Canada, it gets devalued (2010, p. 26). For instance; Canada has a citizenship test in written form and it covers factual, knowledge-based questions on Canadian history, geography, and legal system; therefore the test is based on civic-knowledge instead of cultural knowledge (Hampshire, 2011a, p. 956). This factual knowledge-based citizenship test does not make the test an easy one, whereas it does not put a cultural hurdle in front of the applicant which complicates the citizenship acquisition process as in the case of citizenship tests in Germany and the Netherlands.

Hansen (2010) sees this complex structure as a valuable asset for a society. He adds by stating that it is natural for these civic-requirements to represent pro-immigration conservatives, liberals, anti-Islam conservatives, feminists, gay activists, etc. at the same time because it shows the product of diverse actors and ideas within a democracy (Hansen, 2010, p. 26). Therefore, it is plausible to see the complexity of questions within a test that is a prerequisite for citizenship acquisition. This diverse representation of actors and their ideas are what make citizenship valuable according to Hansen.

However, it is debatable whether these tests are the right mechanisms to measure these diverse ideas in a liberal-democracy. Even though a migrant successfully answers all questions from all kinds of point of views, it does not mean he/she internalizes the norms and values after overcoming hurdles to citizenship. It is stated that universal liberal democratic principles are used for "illiberal exceptionalism" that risks the principles of non-discrimination, human rights, fundamental rights, and respect for diversity (Carrera & Guild, 2010, p. 33). Consequently, these tests risk the universally accepted principles which are more important than trying to reflect diverse ideas on a test that does not guarantee the future participation and contribution of an applicant.

At that point, Joppke (2010) agrees with Hansen and defends citizenship tests. He argues that a liberal state and liberal institutions would not function with illiberal people in it. Liberalism is the only functioning mechanism both as a political theory and ideology; therefore it should be protected by all means, i.e. through citizenship tests (Bauböck & Joppke, 2010). He does not insist on solely applying citizenship tests but since there is no other alternative application to measure applicants' commitment to liberal norms and values yet, they can be practiced.

After all the discussion made on civic-integration policies, and particularly on citizenship tests, Orgad (2010) makes the most plausible suggestion. He argues that a test should not be based on Dutch or German history but instead on the history of the Dutch or German constitution. According to this idea, it would be legitimate to ask about the constitutional monarchy, pillarization, and social tolerance in the Netherlands (Orgad, 2010a, p. 104), instead of asking whether applicants know that Dutch does not close their curtains or whether they are comfortable with seeing topless women. Similarly, it would be legitimate to ask about Bismarck's 1871 constitution, the Weimar Republic, the WWII and the Holocaust in Germany because these are factual knowledge, instead of asking how Germans celebrate Easter since it is a cultural one. Therefore, the idea is to ask the most legitimate components of constitutional history (Orgad, 2010a, p.

104). In this sense, historical facts are more legitimate components of Germany, whereas Easter is less legitimate to be a part of constitutional history. By this way, liberal and voluntary civic integration can work together with a multicultural approach for the future of cultural diversity in Europe (Banting & Kymlicka, 2013).

5.2. The Discussion on the Empirical Impacts of the Civic Turn

5.2.1. The Impact on Naturalization Numbers

The empirical assessment of civic-integration policies is crucial to see if they had any impact on naturalization numbers. Thus, this part examines the outcomes of these policies in empirical terms. In the case of a decrease in naturalization numbers, this thesis looks at the extent to which pass rates of tests affected the naturalization policies. The premise states the idea that if integration tests are too restrictive, it results in the failure of tests. Ultimately, naturalization applications are refused on the ground that integration criteria are not successfully fulfilled.

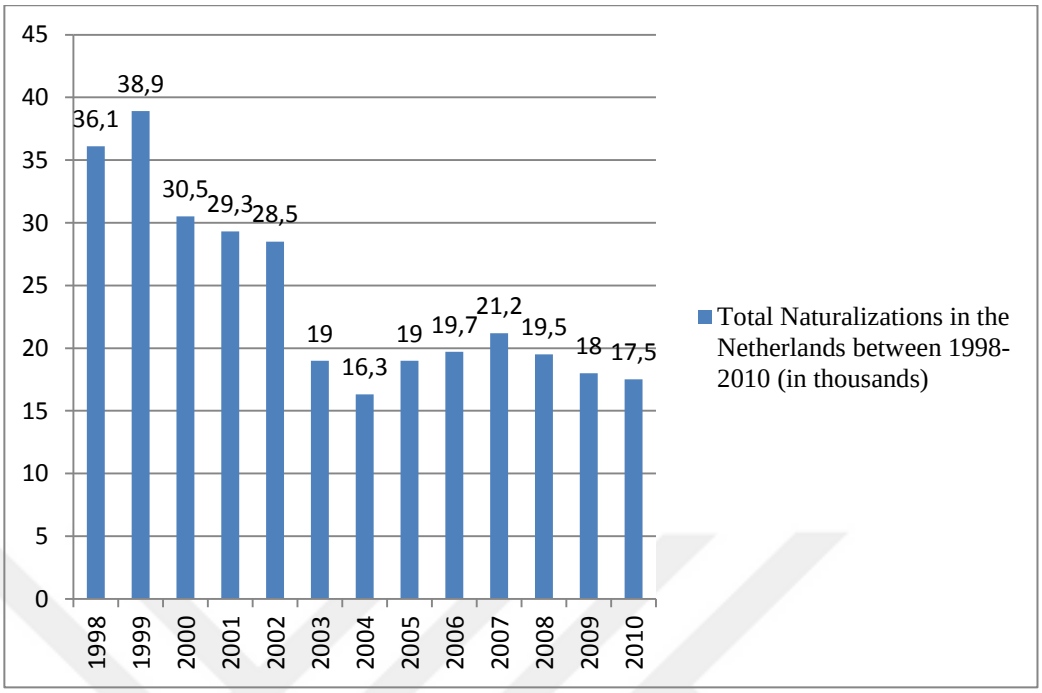

Figure 2. Total Number of Naturalizations in the Netherlands, 1998-2010[40]

Source: (OECD Statistics, 2015), (EUDO Citizenship, 2009), (Van Oers, 2013)

Figure 2 shows that since the first introduction of civic-integration requirements in 1998, the numbers slowly started to decrease. However, there was not a significant decrease until the next civic-integration policy. The most considerable decrease in numbers was in 2003 when the Dutch Nationality Act was enacted with a Naturalization test. Following this, the number dropped almost in half from 28.500 in 2002 to 19.000 in 2003. This decrease can also be explained by the number of naturalization applications to a certain extent; the total number of applications fell from 31.065 in 2002 to 23.752 in 2003, and to 18.455 in 2004 (EUDO Citizenship, 2009).[41]

The decrease continued until 2004 when 16,300 people were naturalized. Thus, the naturalization numbers decreased in following 2 years after the first naturalization test was introduced in 2003. Following this, after the year 2007

[40] The first civic-integration policy entered into force in 1998 therefore years of 1998 and 1999 are also included in this table to observe the change.
[41] More information can be found at: http://eudo-citizenship.eu/databases/citizenship-statistics/data/?stype=1&coun=Netherlands

when the Civic Integration Act was enacted, there had been a small decrease from 21,200 to 19,500. This might be due to level of satisfaction after the first enactments and naturalization processes. In other words, the number of people ready to be naturalized might not be as high as it was prior to the enactment of the first civic law. Thus, the civic-turn acted as a barrier against naturalization after 2002 and the naturalization numbers never increased over 30.000 again. Furthermore, these policies might had different effects on different minorities, especially on the largest group of immigrants of Turkish and Moroccan descent. Since these tests are argued to be referring Muslims by their content, the largest Muslim minorities might had affected.

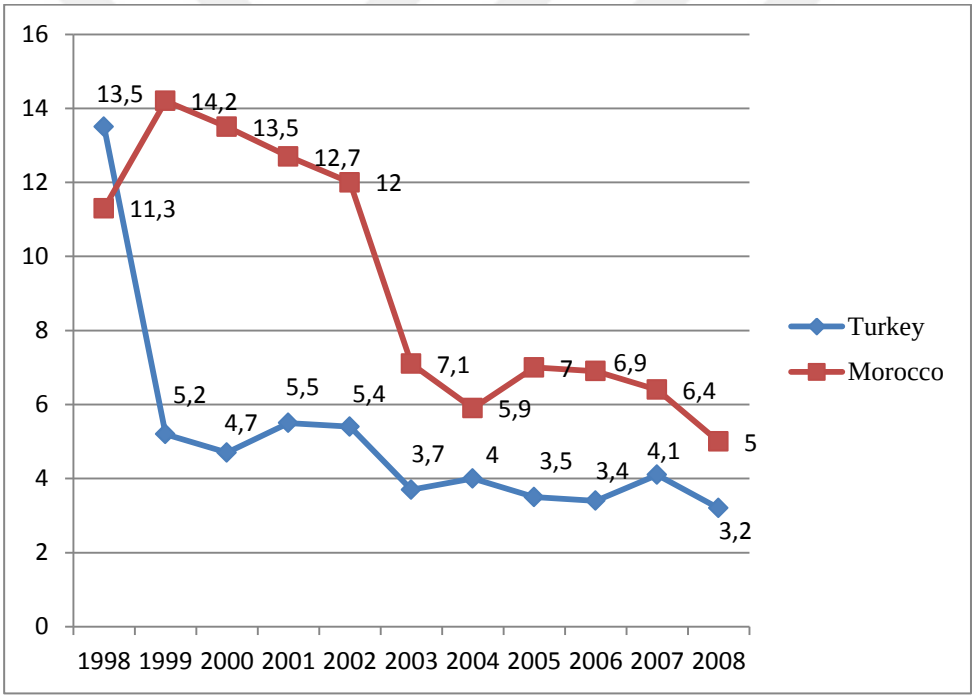

Figure 3. Total Naturalization Numbers by Citizenship of Origin

Source: (EUDO Citizenship, 2009)[42]

The figure shows that there had been a significant decrease in the naturalization numbers of Turkish nationals between 1998 and 1999; the numbers

[42] EUDO Citizenship provides data until the year 2008. Thus, 2009 and 2010 are not shown in this table.

fell from 13.500 to 5.200 in a year. This might be due to the 1998 Civic Integration of Newcomers Act that required participation in integration courses. However, there is not a considerable effect of 2003 Dutch Nationality Act in following years either on Moroccan or Turkish nationals. Nevertheless, numbers of naturalized Moroccan nationals decreased from 7.100 in 2003 to 5.900 in 2004. Even though the decrease is relatively small after the 2003 Dutch Nationality Law, it might be due to the already decreased numbers of naturalizations. For instance; the number of Moroccan naturalization numbers decreased from 12.000 to 7.000 between 2002 and 2003. The table also suggests that the naturalization numbers of both Turkish and Moroccan nationals started to decrease after 2007 and it might be due to the obligatory nature of 2007 Civic Integration Act. The forthcoming years should also be examined to be certain about the continuity of such decrease but post-2010 is not within the scope of this thesis.

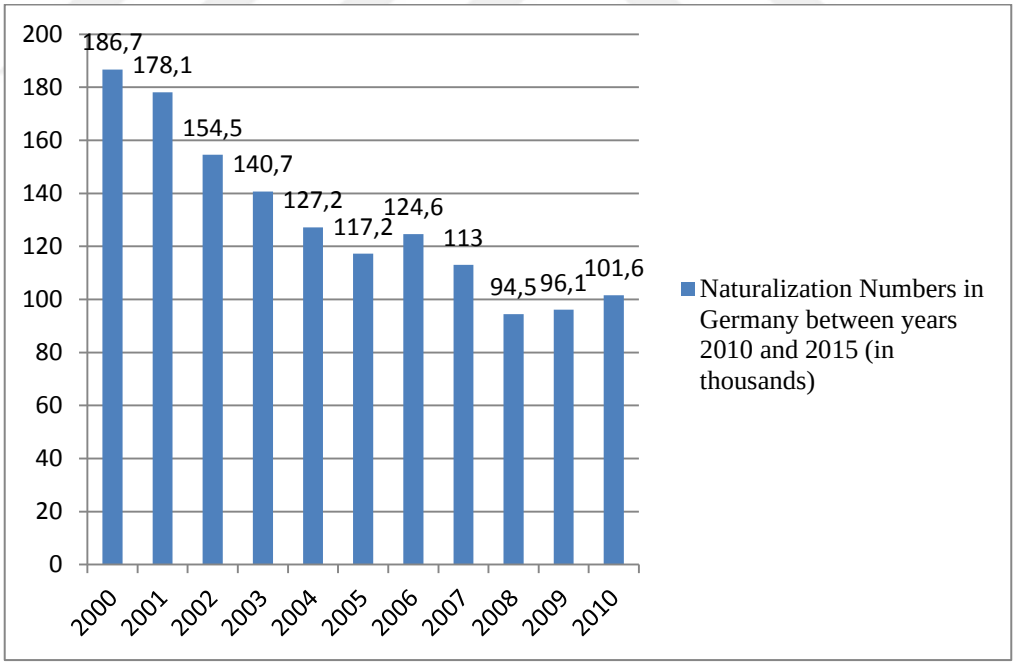

Figure 4. Total Naturalization Numbers in Germany between 2000 and 2010

Source: (The Federal Statistics Office, 2016)

When it comes to the naturalization numbers of Germany, they started to decrease at 2000 when the new Nationality Law was enacted. It fell from 186.700 in 2000 to 117.200 in 2005.[43] The Nationality Act was referred as a milestone of liberalization of citizenship, whereas the numbers suggest otherwise. It is stated that because the liberalization only occurred in the decrease of residency criteria and the introduction of *jus soli*, it did not have a positive impact on those migrants who were already fulfilling the previous criteria of 15 years of residence. Another explanation suggests the fact that the Nationality Law brought additional civic requirements such as the language requirement, and the declaration of loyalty and these requirements might have outweighed the liberalization effect of the reduction of residence requirement and resulted in the decrease in naturalization numbers (Van Oers, 2013, p. 127). Also, there might be a satisfaction after the first wave of naturalizations and the remaining TCNs might be less in number compared to the previous numbers before the 2000 Nationality Act.

The last explanation is related to the Act's impact on the Germany's largest immigrant group; Turkish nationals. Since dual citizenship was only allowed as an exceptional case, Turks needed to renounce their previous nationality to acquire German citizenship. For this reason, their naturalization numbers considerably decreased after the 2000 Nationality Act (Van Oers, 2013, p. 127).

[43] Federal statistics regarding the number of applications for naturalization are not available (Van Oers, 2013, p.127).

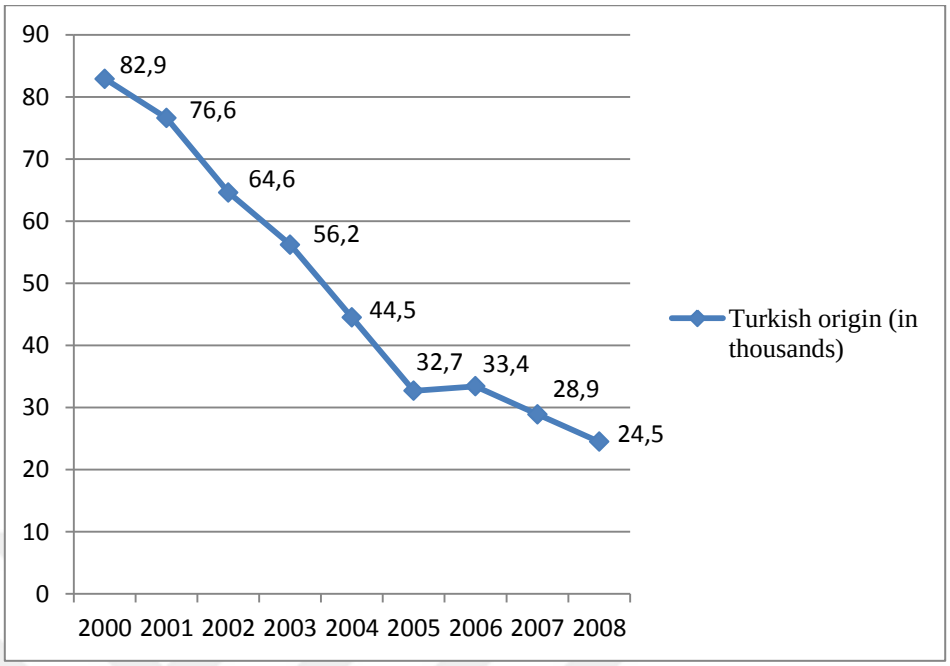

Figure 5.Total Naturalization Numbers of Citizens of Turkish Origin

Source: (EUDO Citizenship, 2009)[44]

As it can be seen from the Figure 5, the number of naturalized citizens of Turkish origin immediately started to decrease after the 2000 Nationality Act. The decrease continued for 8 consecutive years (except the small increase between 2005 and 2006). Kaya (2012) asserts that the citizenship liberalization did not satisfy the expectations of German-Turks; they expected a more liberal citizenship law that allows dual citizenship (p. 49). This dissatisfaction might had reflected on the decrease in naturalization applications but these numbers are not made available by the Federal Statistical Office (Van Oers, 2013, p.127).

Moreover, the 2007 Nationality Law that amended the 2000 Law brought stricter language criteria of the B1 level and introduced a test on the knowledge of society. Looking at Figure 5, one can see that language and knowledge on society tests might had a negative effect on naturalization and the numbers fell from 124.600 at 2006 to 94.500 in 2008 and to 96.100 in 2009.

[44] For more information see: http://eudo-citizenship.eu/statistics-on-acquisition-data/?stype=1&coun=Germany

Lastly, as it was mentioned in Chapter 4, Baden-Württemberg and Hesse developed their own naturalization tests prior to the 2008 Federal Naturalization Test and they were highly controversial in terms of their questions. Since the test in Hesse could never put into practice due to the enactment of the Federal Test, only Baden-Württemberg's impact on state-level naturalizations can be examined. Baden-Würrtemberg is chosen to support the argument that it was the only state whose naturalization numbers decreased among other Länder in Germany in 2006 after the controversial integration test was introduced (Groot, Kuipers, & Weber, 2009, p. 60).

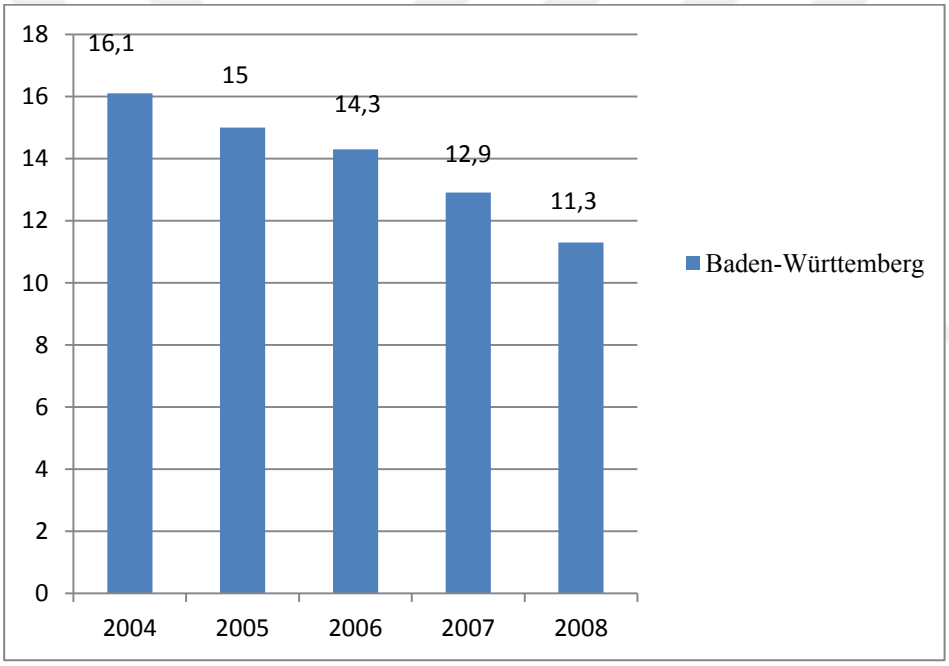

Figure 6. Total Naturalization numbers in Baden-Württemberg

Source: (EUDO Citizenship, 2009)

The data shows that there had been a decrease in naturalization numbers in Baden-Württemberg after 2006 when the naturalization test was introduced. The numbers fell from 14.3000 to 12.900 in 2007 and to 11.300 in 2008. Since the Federal state replaced the tests in Länder in 2008, the results in Hesse has no significant result but the example of Baden-Württemberg proves that the test had

a negative impact on numbers.[45] Rather than the empirical results of Länder tests, the normative discussions on both Baden-Württemberg and Hesse are more significant in terms of the perspectives they represent towards migrant integration and citizenship.

As a result, both the Netherlands and Germany experienced a decrease in their naturalization numbers after the introduction of civic-integration requirements. To simply put, the most considerable decrease in the Dutch case happened with 2003 Dutch Nationality Law and the numbers fell from 45.000 in 2002 to 26.000 in 2004. Similarly, 2000 Nationality Law resulted in the decrease of numbers from 186.000 in 2000 to 117.000 in 2005. The next part analyses the extent to which this decrease can be explained by the pass rates of integration and naturalization tests.

5.2.2. Pass Rates of Citizenship Tests

To start with, the Netherlands applied a naturalization test between 2003 and 2007 and an integration test replaced the previous naturalization test from 2007 onwards. Between 2003 and 2007, 14.300 registered applicants out of 23.700 people who correspond to 60% of the total had completed the test. However, only 81% of 23.700 actually participated in the test either because of the cost of the test (260€) or lack of preparation opportunities. Therefore, 19.314 people actually participated and 74% of them had passed the test (Van Oers, 2013, p. 132).

The second period started with the 2007 integration exam. Similar to the naturalization exam, the pass rate was 74% between 2007 and 2011. 74% pass rate corresponds to 74.371 people and it is significantly higher than 14.300 passes between 2003 and 2007. This increased number might be due to two reasons. First of all, there were 30.000 registered asylum seekers participating in

[45] Due to the federal structure of Germany, each federal state's naturalization numbers differ. However, the data of each state cannot easily be found and it is not within the scope of this thesis. For more information of Länder see: http://eudo-citizenship.eu/statistics-on-acquisition-data/?stype=1&coun=Germany or www.destatis.de

integration courses at 2007 and onwards. Secondly, passing the integration course became obligatory to receive a permanent residence permit since 2010 (Van Oers, 2013, p. 133). Hence, these developments might have acted as a motivation and resulted in a boost in success rates for a period of time. All in all, the number of applicants who succeeded in the first half of the 2000s was relatively less than those who succeeded in the post-2007 period. This explains the overall decrease in numbers in naturalization between 2003 and 2007 to a certain extent. However, there might be other variables that could have affected the process, such as the lack of services provided for preparation, economic insufficiency to pay the costs, lack of motivation, not being able to satisfy the minimum residency requirement, etc.

When it comes to Germany, it also has two periods of different application of tests. The first time frame starts with 2005 within the framework of Immigration Act that included an integration test until 2008 when a federal naturalization test was introduced. In 2005, 17.482 out of 31.478 course participants became test candidates. 12.151 of them managed to pass the test by achieving the B1 level of German (obtained *Zertifikat Deutsch*). This corresponds to 69% of pass rate among test candidates. A year later in 2006, 50.952 out of 76.401 course participants became test candidates. 36.599 passed the test which corresponds to 72% of pass rate. Since 2006, the pass rate started to fall and it became %67 in 2007 (Deutscher Bundestag, 2008).

The next period starts with the 2008 Naturalization Test. Starting with this period, although the number of candidates who took the test increased[46], the pass rate of test candidates continued to decrease; it fell from %61 in 2008 to %51 in 2009. This decrease is argued to be due to the difficulty of reaching the B1 level of German; it appears to be a barrier to naturalization (Van Oers, 2013, p. 135). Compared to the case of Netherlands, where the highest level of language skill required is A2, the requirement of B1 can be considered as a restrictive policy.

[46] Taking the test was optional until 2008. Therefore, the numbers of candidates were less than those who took the test after 2008. Also, applicants can prepare for the test on their own without registering into a course by 2008. (Van Oers, 2013, pp. 135,136).

As a result of the discussion, the civic-turn can be witnessed within the same timeframe for both the Netherlands and Germany, policies were adopted at different years and their content varies to a certain extent. Main differences can be summarized in five aspects in Table 6; integration abroad criteria, language, services provided, economic cost, relation with residence, sanction, public availability.

Table 6. Main Differences in Civic-integration Policies of both States

	The Netherlands	**Germany**
What does it require from applicants abroad?	Integration test including the A1 level of Dutch since 2006	Only language criteria of the A1 level of German since 2008, no integration test is required
Does it provide services to prepare applicants abroad?	Language courses are offered in Dutch embassies at home country	Several language courses are offered through embassies and "Goethe Institut"
What is the required language level for naturalization?	A2 level of Dutch since 2003	B1 level of German since 2005
Are there sanctions in case an integration test is failed to pass?	Yes, the applicant pays a sanction fee since 2007	No
What is the cost of integration tests and naturalization application?	540 € for the test, the naturalization fee was 351 € by 2010	25 € for the test, the naturalization fee was 255 € by 2010
Is the permanent residence permit dependent on the successful completion of the integration test?	Yes, since 2010	Yes, since 2007
Are sample questions of the test publicly available?	No	Yes

As it can be seen from the Table 6, the Netherlands applies a stricter measure for applicants abroad by demanding an integration test. Germany, on the other hand, does not require such a test from applicants abroad. Secondly, the Netherlands offers fewer opportunities compared to German services abroad. If integration is a "two-way street" and migrants are doing their part of duty by learning the language and knowledge on society, then states should support these efforts by providing enough resources as Etzioni (2011, p.343) would suggest.

Moreover, it is also more expensive both to take the test and pay the naturalization fee and there are economic sanctions in case of failure in the Dutch Civic Integration Exam. Germany's test is more affordable compared to the Dutch tests but the language criteria is higher; B1. It is the intermediate level of a language compared to the A2 level of language required by Dutch.[47] Other than these differences, both states have applied almost the same civic criteria between the late 1990s and 2010.

5.3. Findings on Normative and Empirical Discussion

There are certain findings of the normative discussion on civic-integration policies. It should be noted that the normative considerations are limited because the availability of questions differ from each other as it was stated at Introduction and the beginning of Chapter 5. Therefore, generalizations can only be made within the framework of several examples available. However, it is mostly these examples of questions that are preferred to be used in the academic literature. Thus, they are selected in accordance with their content, relevancy to the subject, and within the scope of citizenship theories.

In both the Netherlands and Germany, a communitarian citizenship theory is reflected on the citizenship tests. This means that questions mostly refer to cultural differences and general knowledge about the country. The current German federal state, on the other hand, has a more republican citizenship

[47] For more detailed information on language levels, please see: https://www.coe.int/t/dg4/linguistic/Source/Framework_EN.pdf

understanding. It is hard to interpret the current Civic Integration Test that is being conducted in the Netherlands since no questions are available. This is one other aspect the Dutch test is criticized. All in all, it can be argued that the civic-turn can be justified mainly with the communitarian citizenship theory and the republican citizenship theory to a certain extent.

The most controversial integration test in normative terms for the Netherlands is the Civic Integration Abroad Test. For Germany, there was a consensus on the illiberal character of the test in Baden-Württemberg and it was the most controversial among all civic-criteria with the most relevant content with "illiberal liberalism". Moreover, it is clear that both of these tests are designed to target Islam and Muslim migrants (Michalowski, 2010, p. 759). The questions related to gender equality, homosexuality, and cultural differences are most apparent examples of this view.

This controversy is due to the main premise of the communitarian citizenship theory; a shared culture. This common culture is used interchangeably with the common identity. As it was discussed in Chapter 2, it is hard to set boundaries for a common identity. The common identity might be the sum of history and traditions but it can also be defined as something continuously constructed by the citizens of a state for a common future. This controversy is observed in citizenship tests meaning that there is not a certain guideline to formulate a citizenship. At this point, the National Constitutionalism can be applied to both cases. The states can only include questions that are either historical facts or norms and values that current citizens would be willing to internalize. This might be a way to avoid discrimination based on common identity.

Furthermore, even though Germany had a more restrictive traditional integration policy in terms of *jus sanguinis*, its civic-integration policy is closer to the republican citizenship theory by asking questions related to democracy and general knowledge of the country in the federal Naturalization test. However, the Dutch civic-integration policy is closer to communitarian citizenship theory by asking about cultural questions despite its traditional multiculturalist model. This

assumption mostly applies to the Civic Integration Act Abroad and the integration test showing a video footage on Dutch customs and culture. Hence, it can be argued that traditional integration models cannot be taken for granted to explain integration and citizenship policies in the 21st century (Joppke, 2007b, p. 2). It is not feasible for these models to explain the content of citizenship tests either. However, this should not mean that these models are completely useless; they can still be used for understanding political structures, philosophies of integration, and assessing their impact (Jacobs & Rea, 2007, p. 280). The point is not to use traditional stereotypes while interpreting civic-integration requirements because what they can offer is limited.

In terms of the language criteria of both states, there is not any criticism which can be interpreted as a positive consensus. This shows the fact that knowing the language of the host country to a reasonable extent is a necessity of integration which is accepted by both states. Therefore, the republican citizenship theory's language requirement for an active citizenry can be more easily satisfied with these tests.

When it comes to empirical findings, they yield to certain conclusions. First of all, in both the Netherlands and Germany, a decrease in naturalization numbers observed right after the introduction of civic integration policies; after 1998 and 2003 in the Netherlands and after 2000 in Germany. These decreases in naturalization numbers can be explained by several other factors. For instance; there was a considerable decrease in naturalization applications in the Netherlands between 2002 and 2004 which coincides with the decrease in naturalization numbers. In Germany, numbers of naturalization applications are not available. However, the dual citizenship debate is argued to had a discouraging impact on German-Turks (Kaya, 2012, p. 49) Consequently, the decrease in the naturalization numbers of German-Turks reflected on the total numbers of naturalizations in Germany.

Furthermore, there was a decrease after the following civic-integration policies (after 2007 in the Netherlands and after 2006 in Germany) but this time the gap between the previous years was not that great as can be seen in Figure 2

and Figure 4.This observation can be explained by stating that the first restrictive civic-integration policy acts as a pre-selection mechanism and decreases the numbers significantly. Thus, the already decreased numbers show small reductions in forthcoming years. There is an exception for this premise; Germany witnessed a considerable decrease starting with 2006 which could be explained by the increased level of German from A2 to B1, and the permanent residence permit's dependency to the integration exam.

The decrease in naturalization numbers was reflected on the largest migrant communities as well in both cases. In other words, the number of naturalized Moroccans and Turks in the Netherlands and Turks in Germany fell considerably after the introduction of civic integration policy of 2003 and 2000 respectively. Thus, similar to the finding in the normative discussion, this hurdle is mostly felt on Muslim migrants according to the decrease in their naturalization numbers. It should be noted that this thesis does not claim that the decrease is only due to restrictive nature of civic-integration requirements. There might be other motivations for migrants to choose not to be naturalized. After all, acquiring a state's citizenship is a voluntary process. They could simply enjoy the "denizenship" status by holding civil, social, and cultural rights (Kaya, 2011, p.49). For this reason, they might lack the further motivation to apply for a hard, expensive, long-time integration examination process.

Secondly, the decreases in naturalization numbers comply with the success rates of naturalization and integration exams. The decrease in the numbers between 2003 and 2007 in the Netherlands corresponds to 14.314 successful applicants representing only 60% of all test takers and the decrease in success rate from 72% to 59% in Germany. Thus, the restrictive change had a negative impact on test takers. All in all, it can be argued that civic-oriented policies act as barriers towards naturalization to a certain extent which is reflected in the decrease in naturalization numbers and success rates of citizenship exams.

All in all, this thesis argues that the civic integration policies between 2000 and 2010 represent a communitarian turn in citizenship policies and act as barriers to naturalization towards migrants to a certain extent in the Netherlands

and Germany. With regards to the first premise of this argument, the communitarian turn can be explained with the questions asked by citizenship tests; the most disputed questions in the literature are those referring to knowledge of the country, and cultural differences. They are closely associated with a shared culture and sense of identity.

With respect to the second premise, since the permanent residence permit is dependent on the successful completion of the citizenship test, the decrease in success rates and the lowered naturalization numbers can be interpreted as barriers towards naturalization. Considering the idea that this decrease might be resulting from various other reasons such as material costs, lack of incentives and so on, these tests can be argued to act as barriers only to a certain extent.

CHAPTER 6

CONCLUSION

This thesis has given an overview of the policy change experienced between 2000 and 2010 in Western-Europe in integration and citizenship policies. Within this timeframe, civic-integration policies that introduced citizenship tests were put in force in the Netherlands and Germany. In order to observe objectives and outcomes of these civic policies, this thesis firstly examined main premises of three major citizenship theories. The aim was to understand how these civic policies can be perceived and justified by different citizenship understandings. Accordingly, the liberal citizenship theory prioritizes individual equality and freedom while emphasizing on the law and order to secure these notions. Republican theory finds the liberal conception a passive one and argues for an active citizenry in which citizens themselves are responsible for protecting equality and freedom. These two notions can be seen as the common good of a state and citizens should be willing to contribute to this good through political participation. Lastly, communitarian citizenship accepts all the premises of both liberal and republican theories but argues for a shared sense of identity which prioritizes cultural norms and values.

Looking at these three citizenship theories, this thesis later tried to explain how naturalization process can be shaped accordingly. For the liberal citizenship theory, fulfillment of a residence requirement would be enough to acquire the citizenship. For the republican theory, a migrant should have the language skills and knowledge of law and institutions of a state in order for him/her to be naturalized. The communitarian theory accepts all requirements of liberal and republican theories and therefore requires residency, language proficiency, knowledge of law and institutions but also demands a commitment to the common culture or a shared identity. This justifies the practice of citizenship tests

as an all-encompassing way of measuring social, political, and cultural elements. Therefore, it can be argued that the communitarian citizenship is the most relevant citizenship theory to explain civic-integration policies in terms of its emphasis on identity.

After seeing the importance of citizenship and naturalization, the steps towards the citizenship acquisition were examined in Chapter 3 of this thesis. These steps are integration policies. Starting with the end of the Cold War, a liberalization trend was observed across Western-Europe and this research has reflected on integration policies in a way that many states decreased residency requirements and started to allow dual citizenship. This liberalization trend ceased to exist starting with the new millennium, together with the increasing security concerns and the rise of terrorism. These threats gave rise to the idea that the migrant-integration had failed in Western-Europe.

Stemming from common concerns such as; socio-economic issues in employment and education, and security concerns arising from the threat of terrorism, Western-European states began to introduce integration and citizenship tests, demanded oaths and ceremonies in their integration policies. These requirements became tied to permanent residence permits before the arrival to the host state. For those who successfully pass the first step of integration requirements, a second step requires fulfillment of citizenship tests including language proficiency and knowledge of society. These policies were firstly criticized for their non-compliance with liberal norms and values and argued to be targeting Muslim migrants for their incompatibility with Western values. Secondly, this restrictiveness was designed to act as an immigration policy, eliminating less “liberal” migrants from “liberal” ones.

Integration tests became prerequisites for both access to entry and permanent residence and being unable to pass these tests became mechanisms to eliminate migrants from the process of naturalization. Those who managed to pass these tests were assumed to fulfill liberal conditions required to be a member of societies they wish to become a citizen. Although these tests were designed for

preserving liberal norms and values of societies, the way these tests are conducted in terms of their content became discriminatory and illiberal. Preserving the liberal came with a cost; those values that were worth preserving were challenged by these tests. Thus, this was an era where states that had historically different integration models started to follow similar policy patterns through civic-integration policies.

This thesis had later examined the Netherlands and Germany as two case studies. Normatively, although Germany had traditionally a more ethno-centric integration policy, the latest citizenship test can be interpreted as more liberal and republican in terms of its content. The Netherlands, on the other hand, has a stronger communitarian citizenship influence in its civic-integration policies. The more communitarian an integration and citizenship policy get, it can be criticized more on the grounds of liberal norms and values. If a test asks about migrants' personal beliefs rather than factual knowledge, it is considered as pursuing "illiberal liberalism".

Overall, regarding civic-integration policies in general, it is observed that they perceive migrants as responsible for their own integration. This perception can be best explained by the republican citizenship theory which emphasizes on the active citizenry. Successful integration into the host society is no longer expected from migrants after the citizenship acquisition. Instead, integration is the goal of the naturalization process in a way that the citizenship cannot be granted unless integration requirements are fulfilled. Therefore, it can be stated that the meaning of integration and its relation to citizenship has changed with the civic-integration policies. It has become the priority to ensure that migrants will be ready to actively participate and be aware of their rights, duties, and obligations once they are citizens. Hence, the republican citizenship theory has gained importance.

In terms of citizenship tests as tools of civic-integration policies, this research argues that they have a communitarian perspective. Since communitarian citizenship emphasizes on a shared culture and identity, these

questions can be justified with this citizenship understanding. Moreover, as it was previously mentioned, the communitarian understanding is not separate from liberal and republican citizenship understandings. Instead, it is an all-encompassing citizenship theory that involves basic premises of these two theories. Accordingly, liberal citizenship would demand migrants to know the legal system, basic rights; republican citizenship would demand migrants to learn the language together with the knowledge of law and institutions. The communitarian citizenship's sense of shared culture would also demand these as parts of an identity. Thus, this thesis argues that these citizenship tests in normative terms represent communitarian citizenship theory while encompassing liberal and republican citizenship theories as well. All in all, civic-integration policies in these two states between 2000 and 2010 reflect republican citizenship theory and citizenship tests as tools of these policies reflect communitarian citizenship theory.

In empirical terms, both states experienced decreases in naturalization numbers after the introduction of civic-policies. Similarly, this decrease could also be observed on largest migration communities, Moroccans and Turks in the Netherlands and Turks in Germany. It was noted that there could be a couple of other reasons for the decrease in the given timeframe for both states. For instance; the naturalization applications also decreased in the Netherlands after the introduction of the first civic-integration policy which could be another explanation of total naturalization numbers. On the other hand, for Germany, the dual citizenship debate was argued to be a possible explanation for the decrease in naturalization numbers. Furthermore, there could be other reasons behind the naturalization numbers. This thesis takes the decrease in naturalization numbers as one of the indicators that could be considered for the impact of civic-integration requirements. Therefore, the outcomes of these policies coincided with the decrease in numbers in consecutive years.

Taking all the discussion on civic-integration policies into consideration, it can be stated that it is no longer plausible to rely on traditional integration

models while interpreting current policy convergences/divergences. What can be relied on are common challenges that the states encounter such as; security concerns. Integration policy acts like an immigration policy to keep "unwanted" migrants out of citizenship. Unwanted migrants are mainly those who are un-skilled, less educated, and have low socio-economic conditions. The integration tests act as barriers in front of them. They need to have a certain level of proficiency in host society's language, they need to know the history and legal system of the country and they need to pay for the integration tests and for the naturalization application. Skilled and educated migrants, on the other hand, are more welcome. The language barrier can be solved easier by high-skilled migrants and they would be expected know information related to history, geography, law and institutions, etc. Therefore, civic-integration requirements between 2000 and 2010 have a communitarian and a republican perspective and act as barriers to naturalization to a certain extent and being used as if they are tools of immigration policy.

There are certain points this thesis considers as crucial for the future study areas of this subject. First of all, other than the findings on naturalization numbers, the empirical work on civic-integration policies does not present many arguments on the policy effectiveness. The extent to which these policies are successful in integrating migrants into host societies is lacking (Goodman & Wright, 2015, p. 4). For instance; the purpose of these tests is argued to enhance active political participation and contribution to the common good by republicans, whereas it is unknown whether these policies actually increased political participation among naturalized citizens. Thus, civic-integrationism might have no impact on migrant integration but an important impact on status acquisition.

Likewise, there is no evidence showing how cultural knowledge actually develops and supports one's participation, and contribution to society as a citizen in republican terms. The effects of civic-integration policies on individual-level are very little known (Goodman & Wright, 2015, p. 5). The idea of assessing the commitment to norms and values of a particular state through a test might not be

efficient. Even though a migrant successfully answers all questions in a citizenship test, reaches the desired language and fulfills the rest of the criteria, it does not ensure that individual's future prospect and contribution to that country and does not mean he/she internalizes the norms and values. Therefore, future research in this area might also look to see if these policies really achieved their purpose of creating more aware citizens to contribute common good and whether these norms and values are internalized by them or not.

Post-2010 is a new timeframe for the study of integration policies in the Western-European States. There is only limited work in the academic literature, in years between 2010 and 2015, with regards to civic integration policies.[48] This might be due to the impact of Syrian refugee crisis; the focus might have shifted from integration of migrants to the integration process of refugees.[49]

It is stated that the 21st century invention of integration policies are reflected in refugee integration measures which show similarities with the civic-integration policies. In fact, refugees are offered 600 hours language and civic education courses in Germany (Michalowski, 2017, p. 54). Also, refugees can acquire permanent residence only if they can demonstrate the A2 level of German within 5 years of temporary residence. They also have the chance to have permanent residence in a shorter period of time, in 3 years, if they can demonstrate the C1 level of German (Michalowski, 2017, p. 55). As it can be seen, although there is a difference in terms of the status of a migrant and a refugee, the expected skills from them in an integration process might be similar. Moreover, it is argued that data that could allow a comparison between regular migrants and refugees in four dimensions; labor market outcomes, education, language and culture, legal status and citizenship are not available although it is very crucial (Münz, 2017, p. 13). Hence, the scope of civic-integration requirements might be expanded to encompass refugees in future studies.

[48] There are only a few studies available on this subject in post-2010s. Some of these examples are: (Banting & Kymlicka, 2013), (Goodman & Wright, 2015), (Orgad, 2015).

[49] The most recent work is European University Institute's publication of "Integration of Migrants and Refugees" (Bauböck & Tripkovic, 2017).

The mentality of civic-integrationism is to accept integration as a two-way street. Whoever wants to become a permanent member of a particular society has to fulfill certain obligations first. Those who cannot satisfy these requirements and successfully pass the tests are eliminated from the process of naturalization and they lose their chances to be granted and permanent residence permit. Therefore, citizenship has become an end prize rather than an incentive to enhance further integration. This definition does not separate migrants from refugees; both groups would be responsible for their own integration.

Furthermore, the republican and communitarian citizenship theories are expected to continue to dominate the understanding of naturalization policies in the future. In other words, the active citizenry, being able to and willing to participate, being aware of the legal rights and be ready to protect them, willingness to serve for the common good of the society, being ready to contribute to the common future of the society will be expected from newcomers. For this reason, even though this thesis presented a limited decade between 2000 and 2010, it proposes the background information to examine future challenges in migration, integration, and citizenship policies of Western Europe because it reveals the general perspective, overview, and mentality of these policies. It suggests the idea that civic-integration policies are used as tools of immigration policy in which only migrants that are willing to integrate themselves into the society, even if it means assimilation and comes with a high social, economic, and cultural cost, will be accepted as permanent members.

Therefore, the civic-integration policies introduced and practiced between 2000 and 2010 lay out a framework of citizenship tests on certain criteria; language, factual knowledge, and cultural knowledge. These civic-integration requirements represent republican and communitarian citizenship theories and they act as barriers towards naturalization to a certain extent by decreasing the numbers in the Netherlands and Germany. These policies can be re-visited with the increased security threats, the rise of the far-right, anti-immigrant sentiments, and challenges in the integration process of refugees in the future. The same liberal paradox, legitimate yet illiberal policies to preserve liberal norms and

values, will continue to challenge liberal-democratic states. In this sense, this subject has a considerable potential in integration and citizenship policies and this thesis offers a framework for this issue.

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APPENDICES

APPENDIX A: TURKISH SUMMARY/ TÜRKÇE ÖZET

Göç olgusu yakın zamanda Batı Avrupa ulus devletlerine üyelik ve aidiyet kavramları açısından önemli değişiklikler getirdi. İkinci Dünya Savaşı'ndan sonraki dönemde üyelikle ilgili yasal hükümler ve aidiyetin tanımlanması dönüşüme uğrarken, göç, uyum ve vatandaşlık politikaları birbirine oldukça bağlı hale geldi. Bununla beraber, ulus devletler göçü yönetmek ve düzenlemek için çeşitli politikalar geliştirmeye başladılar. Bu süreç uyum politikalarının oluşturulmasını da beraberinde getirdi. Uyum, bir diğer anlamıyla bütünleşme, vatandaşlık politikaları için önemli bir unsurdur; çünkü kurumlar tarafından belirlenen bir sürecin sonunda göçmenler vatandaşlığa geçebilir ve vatandaş olabilir. Buna bağlı olarak devletler, zaman içinde bazı geleneksel uyum modelleri geliştirmiştir. Bunlar; Fransız asimilasyon modeli, Hollanda çok kültürlülük modeli ve Alman ayrımcı modeli olarak sıralanabilir. Bu modeller genel olarak kan esası olarak bilenen *jus sanguinis* ya da toprak esası olarak bilinen *jus soli* anlayışını benimseyip uygulamışlardır. Bu uygulamaların sonucunda Batı Avrupa'da kapsayıcı veya dışlayıcı vatandaşlık ilkeleri oluşmuştur. Örnek vermek gerekirse, İngiltere ve Hollanda gibi çok kültürlülük modeline sahip ülkeler toprak esasını uygulayarak, ülke toprağında doğan bireylere vatandaşlık verilebileceğini uygun görürken, Almanya gibi kan esasını uygulayan ülkeler vatandaşlığı anne veya babadan geçebilen bir soy ağacıyla tanımlamışlardır.

İkinci Dünya Savaşı sonrasında, bu modeller yaşanan göçün de etkisiyle sorgulanmaya ve değişmeye başladılar. Sırasıyla, 1960'larda ikili anlaşmalarla başlayan işçi göçü hareketlerini, 1970'lerden sonra aile birleşmeleri ve 1980 ile

1990'lar boyunca sığınma başvuruları izledi. Bu göç hareketliliğinin sonucunda Batı Avrupa ülkelerindeki yabancı sayısı oldukça arttı. Yabancı nüfusun geçici değil kalıcı olarak ikamet ettiği anlaşılıp kabul edildikten sonra bu nüfusu topluma entegre etmek amacıyla çeşitli uyum politikaları geliştirilmeye başlandı. Bu gelişmeler, süregelen geleneksel uyum modellerine meydan okumaya başladı.

1990'lı yılların sonuna gelindiğinde, göçmen nüfusun işsizlik oranlarının yüksek oluşu, devletin yardım fonlarına bağımlı yaşar hale gelmeleri, göçmen çocukların eğitim sistemlerine uyum sağlayamaması ve başarılarının düşük olması ve bunun gibi sorunlar uyum politikalarının istenilen başarıya ulaşamadığını göstermeye başladı. 2000'lere gelindiğinde bu ekonomik ve sosyal sorunlara güvenlik endişeleri eklendi. 11 Eylül terör saldırısı, 2004 Madrid ve 2005 Londra terör saldırıları, 2002'de Hollandalı siyasetçi Pim Fortuyn'un 2004'te ise film yapımcısı Theo Van Gogh'un öldürülmesi, yaşanılan ekonomik sıkıntılar ile birleşti ve mülteci uyum süreci 2000'lerle beraber kamusal uyum politikalarının etkili olduğu yeni bir döneme girdi.

Kamusal uyum, bütünleşme politikalarında 2000'lerle başlayan kısıtlayıcı bir anlayışı ifade etmektedir. Buna göre, ülkeler uyum politikaları gereği göçmenlerden ülkenin dilini ve ülke hakkında belli seviyede bilgiye sahip olmalarını beklemektedirler. Ülke bilgisi çoğunlukla tarih, coğrafya, kültür ve hukuk sisteminden oluşmaktadır. Bu koşullar uyum ve/ya vatandaşlık testi aracılığıyla ölçülmektedirler. Testler yazılı bir sınav veya sözlü mülakat şeklinde yapılabilmektedir. Bu kamusal uyum şartları vatandaşlığa geçiş için gereken ön koşullardır ve hâlihazırda var olan vatandaşlığa geçiş şartlarına ek olarak sunulmaktadırlar. Bir diğer deyişle, vatandaşlık için gerekli olan belirli bir süre ikamet etmiş olma koşulu gibi şartlar geçerliliğini korumaktadır.

Kamusal uyum politikalarının geçmişteki uyum ve vatandaşlık politikalarından farkı, bu gerekliliklerin bir zorunluluk ifade etmeleridir. Vatandaşlık bundan böyle daha etkili bir uyum süreci için verilen bir ödül değil, başarıyla tamamlanmış bir sürecin sonunda kazanılan bir hak olarak görülmeye başlanmıştır. Zorunluluğa ve gerekliliğe vurgu yapan politikalar üçüncü ülke

vatandaşlarında daha fazla sorumluluk vermekte, toplumun bir üyesi olmak istiyorlarsa aktif bir şekilde sorumluluklarını yerine getirmelerini istemektedirler. Bu açıdan, kamusal uyum, "çift taraflı bir yolu" ifade etmektedir. Bir tarafta ülkeler vatandaş adaylarına çeşitli seçenekler ve imkanlar sunarken, göçmenler de bu imkanları hak ettiklerini kanıtlamaya çalışacaklardır.

Bu kamusal uyum politikalarının genel hem normatif hem de ampirik etkileri görülmektedir. Normatif açıdan, 2000'lerle başlayan bu dönem, iki şekilde ele alınmaktadır. İlk olarak, uygulanan politikalar, liberal, cumhuriyetçi ve toplulukçu vatandaşlık teorileri açısından incelenmektedir. Testlerin içeriğine ve sorulan sorulara bakılarak, vatandaşlık teorilerinin nasıl ve ne ölçüde politikalara yansıdığına bakılmaktadır. Buna göre, liberal vatandaşlık teorisi bir devlet içindeki tüm bireyleri özgür ve eşit kabul eder. Aynı zamanda liberal vatandaşlık, bireye resmi bir statü ile beraber evrensel olan belirli haklar ve görevler tanır. Liberal vatandaşlık teorisinde aktif katılım konusunda herhangi bir vurgu yapılmaz. Cumhuriyetçi vatandaşlık teorisi ise, liberal vatandaşlık teorisi gibi özgürlük ve eşitlik değerlerini kabul eder ancak bireylerin bu değerlere tek başlarına ulaşamayacağına inanır. Bu nedenle, özgürlüğü, karar verme sürecine ve kamu yararına aktif katılım olarak tanımlar. Bu açıdan, cumhuriyetçi vatandaşlık teorisi aktif vatandaşlık ve siyası katılıma vurgu yapar. Son olarak, toplulukçu vatandaşlık teorisi ortak kimliği ve buna bağlı olarak ortak kültürü destekler.

Bu üç vatandaşlık teorisine bağlı olarak vatandaşlığa geçiş süreci farklı şekillerde ortaya çıkmaktadır. Vatandaşlığa alma, bir kişinin bir yabancıdan bir vatandaşa dönüştürülmesi ve belirli haklar ve imtiyazlar verilmesi süreci olarak tanımlanabilir. Buna göre, liberal vatandaşlık, kapsayıcı ancak vatandaştan bir beklentisi olmayan vatandaşlık anlayışıdır. Liberal minimalistler için, vatandaşlık gereklilikleri düşük tutulmalı ve sadece ikamet süresi ile ölçülmelidir. Belirlenen bir süre boyunca bir devlette kanunen ikamet eden herhangi bir göçmenin vatandaşlığa alınması gerektiği belirtilmektedir. Cumhuriyetçi vatandaşlık teorisi vatandaşlığa geçiş süreci için ülkenin dilinin belirli bir seviyede bilinmesini talep

ederek, bu sayede göçmenlerin siyasi hayat başta olmak üzere her alana aktif olarak katılım sağlayabileceklerini savunmaktadır. Bu sebeple, ülkede konuşulan dili bilmeyen bir bireyin yeterli katılımı sağlayamayacağı düşüncesiyle vatandaşlığa geçmesi mümkün olmaz. Toplulukçu vatandaşlık anlayışı ise ortak kimliğe önem verdiği için vatandaşlığa geçiş sürecinde göçmenden o devletin dilini, tarihini ve kültürünü, kısacası ortak değerlerini bilmesini beklemektedir. Bu beklentiler çeşitli yollarla talep edilebilir. Bu yolların tartışmaya en açık olanı vatandaşlık testleridir. 2000 ve 2010 yılları arasında Avusturya, Danimarka, Almanya, İsviçre, Birleşik Krallık ve Hollanda gibi birçok ülke vatandaşlığa geçiş testleri uygulamaya başlamışlardır.

İkinci olarak, normatif açıdan bu uyum politikalarının liberal demokrasilerin savundukları evrensel norm ve değerler ile uyumlulukları tartışılmaktadır. Tartışmaların bir kısmına göre bir göçmenin uyumu, neyin "iyi" olduğu üzerinde fikir birliği yerine, neyin "doğru" olduğuna odaklanılarak sürdürülmelidir. İyi olanı sormak, göçmenlerin kişisel düşünce ve inanç sistemlerine müdahale edeceği için liberal açıdan düşünce özgürlüğüne ters düşebilecek sonuçlar doğurmaktadır. Bu sebeple sadece bilgiye dayanılan, anayasal bilgilerin sorulmasına özen gösterilmesi gerektiği savunulmaktadır.

Ayrıca, kamusal uyum politikaları, ülkelerin ulusal kimlik ve ideolojilerini temsil ettikleri düşüncesiyle "kimlik liberalizmi" olarak da adlandırılmaktadır. Bu görüşe göre politikalar etnik bağlar yerine liberal değerler üzerinde ulusal bir kimlik oluşturmaktadır. Böylece, vatandaşlık sınavları, tarih, kültür, hukuk sistemi ve kurumlarına dayalı gerçekleri sormaları halinde ancak liberal olarak görülebilirler; çünkü bu tür bilgi bilişsel olup, herkes tarafından öğrenilebilir. Buna karşın, gerçeklere dayalı bilgilerden değer yargılarına geçerek iç tutumları sorgulayan yurttaşlık testleri inançları kontrol ettiği için "illiberal" olarak adlandırılmalıdır. İnançlar ve kişisel değerler üzerinden dışlama siyasi liberalizmin temel ilkeleri olan bireysel özgürlük ve eşitliğe aykırıdır; ancak içsel tutumlarla olgusal bilgi arasında nasıl bir çizgi çizileceği açık değildir. Bu noktada bir "liberal paradoks" söz konusu olduğu iddia edilebilir. Bu çelişkiye

göre, liberal norm ve değerleri korumak adı altında bu değerlerin kendisiyle ters düşen yöntemler denenmektedir.

Ampirik açıdan değerlendirildiğinde bu kamusal uyum politikalarının Almanya, Avusturya, Danimarka, Fransa, Birleşik Krallık, Lüksemburg ve Hollanda gibi birçok Batı Avrupa devletinde görüldüğü söylenebilir. Ülkelerin vatandaşlık kanunlarında görülen değişiklikler büyük ölçüde 2000 ve 2010 yılları arasında meydana gelmiştir. Çeşitli indekslerle ölçülmeye ve yorumlanmaya çalışılan bu politikalardan belirli sonuçlar çıkarılabilir. İlk olarak, "CIVIX" adı verilen bir indeks, kamusal uyum politika sayısı arttıkça vatandaşlığa geçişin ve erişimin daha kısıtlayıcı olacağını savunur. Buradan yola çıkarak, koşulların ve talep edilen unsurların fazla olduğu Almanya ve Danimarka gibi ülkeler en "kısıtlayıcı" ülkeler olarak değerlendirilirken, koşulların göreceli olarak daha az olduğu Belçika ve İrlanda ülkeler "kolaylık sağlayan" ülkeler olarak belirtilmiştir. Bu indeksin sunduğu sonuçlara karşılık, "MIPEX" adı verilen bir başka ölçüm aracı, vatandaşlığa geçiş sürecine bakarken kamusal uyum politikaları dışında çifte vatandaşlık gibi diğer vatandaşlık koşularını da ölçüme katmaktadır. Sonuç olarak, Almanya gibi birden fazla koşulu içinde barındıran bir ülkenin vatandaşlığa geçiş sürecinin, Finlandiya ve İrlanda gibi daha az koşul talep eden ülkelere göre daha kolay ve rahat olduğu sonucuna varılmıştır.

Bu ampirik çalışmalara göre, farklı indeksler birbirlerini tamamlayıcı şekilde kullanılabilir. Aynı zamanda, bir ülkenin geleneksel uyum ve vatandaşlık politikaları ve sahip olduğu kamusal uyum şartları o ülkede vatandaşlığa geçiş sürecinin daha zor olacağını garanti etmez. Ancak; getirilen politikaların uygulamada getirdiği sonuçlara bakılarak, kısıtlayıcı veya yasaklayıcı niteliklere sahip olduğu yargısı yapılabilir. Kısaca özetlemek gerekirse, kamusal uyum politikalarının ampirik değerlendirmesi, bu politikaların içerikleri, getirildikleri yıllar ve sonuçları açısından ayrı ayrı değerlendirilebilir. Ortaya çıkan değerler, karşılaştırma ve birbirini tamamlama amacıyla kullanılabilir.

Normatif ve ampirik tartışmaların sonucunda 2000'lerle beraber Batı Avrupa ülkelerinde uygulanan kamusal politikalar ve bunların doğurduğu

sonuçlar, Hollanda ve Almanya örnekleri üzerinde detaylı bir şekilde incelenebilir. Her iki ülke de 1960'lardan itibaren işçi göçüyle beraber çok sayıda göçmene ev sahipliği yapmış ve 1970'ler ve 1980'ler boyunca aile birleşmesi yoluyla bu göçmenlerin sayısı oldukça artmıştır. 1980 sonrası dönemde de artan bireysel sığınma talepleriyle iki ülkede bulunan üçüncü ülke vatandaşlarının sayısı artmıştır. Artan göçmen ve mülteci sayıları, ekonomik zorluklar ve güvenlik kaygılarıyla beraber ilk olarak Hollanda, kamusal uyum politikalarını ortaya sunmuştur. Almanya ise, Hollanda'yı örnek alıp takip ederek, 2000'ler boyunca benzer politikaları hayata geçirmiştir.

Detaylı incelenecek olursa Hollanda, çok kültürlülük modelinin öncülerinden biri olarak kabul edilmiştir. Zaman içinde çok kültürlülüğü, başarılı bir uyum süreci için kültürel çoğulculuğu kurumsallaştırmak amacıyla benimsenmiş ve uygulamıştır. Tarihsel olarak bakıldığında, Hollanda hem göç veren hem göç alan bir ülke olmuştur. 17. yüzyılda ekonomik ve kültürel bir mıknatıs haline gelen ülke, 18. ve 19. Yüzyıllarda kolonileşme hareketleriyle beraber göç vermiştir. Kolonilerin bağımsızlıklarını kazanmalarından sonra ülkeye çeşitli göç hareketlilikleri gerçekleşmiştir. İlk ve en büyük göç hareketliliği 1945 yılında eski kolonilerinden biri olan Endonezya'dan olmuştur. Bunu takiben sırayla Surinam, Hollanda Antillerinden, Aruba, Bonaire ve Sint Maarten adalarından gerçekleşmiştir. Hollanda, artan etnik ve dini çeşitliliğe karşı "sütunculuk" politikasını geliştirmiştir. Bu anlayışa göre azınlıklar kendi kurumlarını oluşturma imkânına sahip olmuşlardır. Bir diğer deyişle, sütunculuk sayesinde farklı gruplar kendi eğitim, sağlık sorunlarıyla ilgilenmek üzere alt kurumlar açabilmişlerdir.

Dekolonizasyon ve sütunculuk geçmişine ilave olarak, İkinci Dünya Savaşı sonrasında imzalanan ikili anlaşmalar sonucunda Hollanda'ya işçi göçü başlamıştır. 1973 yılında ekonomik kriz ile yeni işçi alımı bitmesine rağmen, aile birleşmesi ve 1980'ler ve 1990'lar boyunca devam eden bireysel iltica başvurularıyla göçmen sayısı artmaya devam etmiştir. Göçmenlerin çalıştıktan sonra dönecekleri algısı, kalıcı politika üretiminde geç kalınmasına sebep

olmuştur. 1990'lar ve 2000'ler ile beraber göçmenlerin iş gücüne ve eğitim alanına uyum sağlayamadıklarına karar verilmiştir. Bununla birlikte, artan güvenlik endişeleri, siyasetçi Pim Fortuyn'un 2002'de öldürülmesi, yapımcı Theo Van Gogh'un 2004'te Fas asıllı bir Hollanda vatandaşı tarafından öldürülmesi Hollanda'da mülteci uyum sürecinin başarısız olduğu fikrini sağlamlaştırmıştır. Böylece, 2000'ler ile birlikte kamusal uyum politikaları devreye girmiştir.

Bu politikalara göre, aile birleşmesiyle Hollanda'ya gelmek isteyen göçmenlerden dil bilgisi ve uyum testini geçmeleri istenmektedir. Bu testi geçemeyen ve dil şartını sağlayamayan adaylar geçici oturma iznini alamadıkları için aile birleşmesini gerçekleştirememektedirler. Vatandaşlığa geçmek isteyen göçmenlerden ise benzer şekilde dil ve vatandaşlık testi şartlarını yerine getirmeleri istenmeye başlanmıştır. Bu sınavlar sadece vatandaşlığa geçiş ön şartı olmamakla beraber, aynı zamanda kalıcı oturum iznine sahip olmak için de gerekmektedirler. Kronolojik sırayla Hollanda'nın uyguladığı kamusal uyum politikaları şu şekilde sıralanabilir; 1998 Yeni gelen Uyum Yasası, 2003 Vatandaşlık Yasası, 2006 Yurtdışındakiler için Kamusal Uyum Yasası ve 2007 Kamusal Uyum Yasası.

Aynı dönemde kamusal uyum politikalarını uygulayan bir diğer ülke de Almanya'dır. Hollanda'dan farklı olarak, Almanya'nın geleneksel vatandaşlık anlayışı kan esasına dayanmaktadır. Buna bağlı olarak tarihsel bir bakış açısıyla ayrımcı entegrasyon modeline örnek gösterilmiştir. Siyasi birleşmesini geç tamamlayan, kolonileşme süreci yaşayamayan Almanya, etnik değerler üzerinden tanımladığı bir vatandaşlık anlayışına sahip olmuştur. Vatandaşlığa kabul, Doğu Avrupa ve Rus toprakları üzerinde yaşayan etnik Almanlar için kapsayıcı, kan bağı taşımayan göçmenler için dışlayıcı olmuştur. Bu anlayış İkinci Dünya Savaşı sonrasında ikili anlaşmalarla başlayan işçi göçü ile değişmeye başlamıştır. 1973'te yaşanan ekonomik krizin etkisiyle yeni işçi alımı son bulmuş ancak aile birleşmesi ve bireysel iltica başvurularıyla 1990'lara kadar göç devam etmiştir. Uzun yıllar kendisini bir göç ülkesi olarak tanımlamaktan çekinen Almanya, artan göçmen nüfusu sonucunda göçmenlerin uyum eksiğini gidermek, ekonomik

ve sosyal alanda uyumu artırmak ve küreselleşen güvenlik endişelerine karşı önlem almak amacıyla 2000'lerden itibaren kamusal uyum politikalarını uygulamaya başlamıştır. Hollanda'ya benzer bir şekilde, aile birleşmesiyle ülkeye gelecek göçmenlerden belirli bir dil yeterliliği ve ülkede ikamet eden, vatandaşlığa geçmek isteyen göçmenlerden dil yeterliliğini de içeren vatandaşlık testini başarıyla geçmelerini beklemektedir. Bu testler hem geçici ve kalıcı oturma iznini etkilemekte, hem de vatandaşlık statüsü için ön şart niteliğindedir. Kronolojik olarak Almanya'nın 2000 ve 2010 yılları arasında uyguladığı kamusal uyum politikaları; 2000 Vatandaşlık Kanunu, 2004 Göç Yasası, eyalet düzeyinde 2006 Baden-Württemberg Vatandaşlık Testi, 2007 Vatandaşlık Yasası ve 2008 Vatandaşlık Testi olarak sıralanabilir.

Yapılan karşılaştırma sonu her iki ülkede de verilen zaman dilimi içinde benzer politikalar uygulandığı söylenebilir. Ancak; bazı farklılıklar da bulunmaktadır. Almanya'da vatandaşlık koşulu olarak B1 seviyesinde dil yeterliliği istenirken, Hollanda'da istenilen en yüksek dil seviyesi A2'dir. Bu da Alman uyum politikalarını dil koşulu açısından daha zor kılmaktadır. Buna karşın, Almanya'da uyum testi ve vatandaşlığa geçiş ücreti, Hollanda'ya göre daha ucuzdur. Maddi açıdan Hollanda göçmenlerden daha yüksek bir ücret talep etmektedir. Buna benzer bir farklılık olarak, Alman hükümeti yurtdışındaki üçüncü ülke vatandaşlarına dil sınavını geçmeleri için konsolosluklar ve enstitüler aracılığıyla imkan sunarken, Hollanda hükümeti dil ve uyum testine hazırlanılması için sadece konsoloslukları görevlendirmiştir. Bu da yeterli hizmetin adaylara ulaştırılması konusunda eleştiriye açık bir durum yaratmaktadır. Verilen hizmetin sonunda eğer aday kişi testi geçemez ve başarısız olursa, Hollanda hükümeti kurs ücreti dışında bir de ceza ücreti talep edebilir. Alman hükümeti ise fazladan bir ceza ücreti talep etmez; ancak adayın kurslara devamsızlık oranını göz önünde bulundurarak kursa ödenen miktarın geri ödenmesini talep edebilir. Son olarak, Alman vatandaşlık testi örnek soruları erişime açıkken, Hollanda soruları halka duyurmamayı tercih etmektedir. Bu da hem sınava hazırlık hem de sorular üzerinde inceleme yapmak açısından sorunlar yaratmaktadır. Bu farklılıklar dışında her iki ülke de geçici ve kalıcı oturma

izinlerini ve vatandaşlık statüsüne erişimi kamusal uyum politikalarının başarılı bir şekilde tamamlanmasına bağlı kılmışlardır.

Bu tezde her iki ülkedeki testler normatif ve ampirik açılardan incelenmektedir. Normlar açısından, öncelikle testlerin üç farklı vatandaşlık teorisinden hangisine daha yakın olduğu, içerdikleri sorulara bakarak analiz edilmektedir. Ülkenin hukuki sistemiyle ilgili olan sorular daha çok liberal vatandaşlık teorisiyle ilişkilendirilirken, demokrasi ve siyasi düzen ile ilgili olan sorular daha çok cumhuriyetçi vatandaşlık teorisiyle, kültürel içeriği olan sorular ise toplulukçu vatandaşlık teorisiyle bağdaştırılmıştır. Testler dikkate alındığında, cumhuriyetçi vatandaşlık anlayışının aktif vatandaşlar yetiştirme amacının kamusal uyum politikaları ile önem kazandığı, toplulukçu vatandaşlık teorisinin ise vatandaşlık ve entegrasyon testleri ile birlikte ortak kimliğe ve kültüre verilen değerini artırdığı söylenebilir.

Daha sonra, bu soruların içerikleri göz önünde bulundurularak, liberal norm ve değerler ile olan uyumları sorgulanmaktadır. Örneğin, Hollanda'nın ülke dışındaki adaylara uyguladığı uyum testi ve Almanya'nın belirli bir dönem Baden-Württemberg eyaletinde uyguladığı vatandaşlık testi ataerkillik, cinsiyet eşitliği, gelenek ve görenekler, vs. ile ilgili sorular içermektedir. Tartışmalı sorulardan verilebilecek bazı örnekler şu şekildedir; "Eğer oğlunuz size eşcinsel olduğunu söylerse tepkiniz ne olur?" "Kızınız veya karınız Alman kadınlar gibi giyinmek isterse bunu önlemeye çalışır mısınız?" "Görücü usulü evlilikler hakkındaki görüşleriniz nelerdir?" "Almanya'da yüzme dersleri karışık olarak yapılmaktadır. Kızınızın derslere katılımına izin verir misiniz?" Bu testlerin evrensel bir karaktere sahip olmasına rağmen, içerikleri sebebiyle Müslümanlara hitap ettiği iddia edilebilir. Bir başka deyişle, İslami değerlerin Batı'nın liberal norm ve değerleri ile uyumlu olmadığı algısının, vatandaşlık ve uyum testleri üzerine yansımış olduğu yorumu yapılabilir.

Özetle, kişisel inançları ve düşünceleri irdeleyen soruların siyasi liberalizm görüşünün bireysel özgürlük ve eşitliğe verdiği önem ile çatışması nedeniyle bu soruların "illiberal" olduğu iddia edilmiştir. Kısaca, Batı Avrupa

ülkeleri liberal değerleri korumak için liberal olmayan yollara başvurabilmektedir. Soruların liberal değerlerle çatışmasını önlemenin yollarından biri olarak, "Ulusal Anayasacılık" olarak adlandırılan bir fikir ortaya atılmıştır. Bu anlayışa göre, adaylara Anayasa'da da bulunan, kanunlara uygun, öğrenilebilir bilgiler sorulabilir. Benzer bir fikre göre de, adaylara neyin "iyi" olduğu yerine neyin "doğru" olduğu sorulmalıdır. Örneğin, Hollanda'da sütunculuk geçmişi veya anayasal monarşi hakkında soru sorulabilir. Almanya'da ise Weimar Cumhuriyeti veya II. Dünya Savaşı hakkında sorular sorulabilir. Bu tarz sorular bireylerin inanç sistemlerine değil bilgi düzeylerine işaret etmektedir. Bu şekilde, uygulanan politikaların liberal değerlerle uyumu sağlanabilir.

Uygulanan politikalarının ampirik sonuçlarına bakıldığında, politikaların uygulandıkları yıllar ve etkili oldukları seneler içinde, her iki ülkede de vatandaşlığa geçen göçmen sayısında düşüş olduğu gözlemlenmiştir. Hollanda'da 1999'da 39.000 olan toplam vatandaşlığa geçiş sayısı 2004 yılında 16.000'e düşmüştür. 2004 yılından sonra getirilen uygulamaların sonrasında ise belirgin düşüşler olmamıştır. Buna benzer olarak Almanya'da 2000 yılında 186.000 olan toplam vatandaşlığa geçiş sayısı 2005 yılında 117.000' e düşmüştür. İlerleyen senelerde düşüş devam etse de çok belirgin bir azalma gözlemlenmemiştir. Bu düşüşün başvuru sayılarında azalma, motivasyon eksikliği, doyuma ulaşma, maddi olanaksızlık gibi başka sebepleri de olabilmesi mümkündür. Bu sebeple, kamusal politikaların düşüşe sebep olan tek etken olduğu düşünülemez. Ancak genel olarak, bu araştırma sayılardaki düşüşün kamusal uyum politikalarının uygulanmasıyla doğru orantılı olduğu düşüncesindedir.

Aynı zaman aralığında, Hollanda'da en büyük Müslüman azınlık olan Türk ve Faslı asıllı göçmen nüfusunun vatandaşlığa geçiş sayıları ve Almanya'da Türk asıllı göçmenlerin vatandaşlığa geçiş sayılarında da düşüş olmuştur. Sırayla, Hollanda'da Türkler arasında 1998'de 13.000 olan vatandaşlığa geçiş sayısı 2003'te 3.700'e düşerken, Fas asıllıların 1999'da 14.200 olan sayıları 2004'te 5.900'e düşmüştür. Almanya örneğine bakıldığında ise, 2000 yılında Türklerin 82.000 olan vatandaşlığa geçiş sayısı 2007'de 28.900'e düşmüştür. Daha önce de

belirtildiği gibi sayılardaki düşüşleri sadece kamusal uyum politikalarının etkilerine bağlamak doğru olmaz. Belirli bir doyuma ulaştıktan sonra rakamların ileriki senelerde düştüğü de söylenebilir.

Sonuç itibariyle bu tezde, her iki ülkede 2000 ve 2010 yılları arası uygulanan kamusal uyum politikalarının aktif vatandaşlığı ve siyasi katılımı artırma amacıyla cumhuriyetçi vatandaşlık anlayışını yansıttığı, bu politikaların bir aracı olan vatandaşlık testlerinin ise ortak kültüre ve kimliğe verdikleri önem açısından toplulukçu vatandaşlık anlayışına daha yakın olduğu iddia edilmiştir. Bu testlerin içerik açısından, belli sorular aracılığıyla kişisel inanç ve düşüncelere müdahale ederek liberal değerleri sorgulattığı ve Müslümanlara yönelik hazırlandığı savunulmuştur. Bu politikaların ampirik etkilerine bakıldığında ise 10 yıllık süreç içerisinde vatandaşlığa geçiş sayılarında belirgin düşüşlerin gözlemlendiği ancak bu düşüşe sebep olabilecek farklı unsurlar da olabileceği göz önüne alındığında kamusal politikaların düşüşe sebep olan etmenlerden sadece biri olduğu belirtilmiştir.

Genel olarak bu politikalar, bir göç politikası unsuru olarak kullanılmaktadırlar; çünkü göçmenlerin ülkeye girişi ve kalıcı olarak ikamet etmesi testlerin başarıyla geçilmesine bağlı hale gelmiştir. Bu haliyle, uyum ve vatandaşlık testleri ülkelerin iç sınırlarını çizmektedirler. 2000 yılından itibaren vatandaşlık statüsü, verildiği kişiyi bulunduğu topluma uyum sağlamaya teşvik edecek bir ödül gibi algılanmaktan çıkmıştır. Bunun yerine, vatandaşlık, beklentilerin olduğu bir uyum ve bütünleşme sürecinin tamamlanmasından sonra verilebilecek bir statü haline gelmiştir. Bir başka deyişle, 2000 öncesinde bütünleşme statüden sonraki beklentiyken, 2000 sonrasında statü için istenilen ilk koşul olmuştur.

2010 yılı ve sonrasında kamusal uyum politikalarıyla ilgili fazla veri bulunmamaktadır. Yapılan çalışmalarda ise bu politikaların etkili olup olmadığı, planlandığı üzere göçmenleri bulunan topluma daha iyi entegre edip etmedikleri, bireyler üzerindeki etkileri yeterince yer bulmamaktadır. 2010 sonrası bu dönemde, Suriyeli mülteci krizi, aşırı sağın yükselişi, İslamofobi, yabancı

düşmanlığı gibi daha çok hissedilmeye başlayan gelişmeler ile beraber, kamusal uyum politikaları ve göçmenlerin uyum sorunsalı yeniden ele alınabilir. Bu açıdan ortak kimlik ve kültüre verilen önemi öne çıkarmak amacıyla vatandaşlık testlerinin de kullanılmaya devam edileceği düşünülebilir. Sonuç olarak, göç, uyum ve vatandaşlık kavramları açısından kamusal uyum politikaları önemli bir yere sahip olmaya devam etmektedir. Bu politikalar, 21. yüzyılda uluslararası göç olgusuna ve bunun getirdiği sosyal, kültürel, ekonomik ve siyasi sonuçlara verilen bir yanıt olarak görülebilir. Aynı zamanda, bu politikalar, liberal demokrasilerin çeşitliliğe ve ortak sorunlara verebilecekleri yanıtların sınırlarını test etmektedirler.

APPENDIX B: TEZ FOTOKOPİSİ İZİN FORMU

ENSTİTÜ

Fen Bilimleri Enstitüsü ☐

Sosyal Bilimler Enstitüsü ■

Uygulamalı Matematik Enstitüsü ☐

Enformatik Enstitüsü ☐

Deniz Bilimleri Enstitüsü ☐

YAZARIN

Soyadı : Süm
Adı : Elif
Bölümü : Avrupa Çalışmaları

TEZİN ADI (İngilizce) : Migration, Integration, and Citizenship in Western-Europe: The Role of Civic Integration Requirements in the Netherlands and Germany

TEZİN TÜRÜ : Yüksek Lisans ■ Doktora ☐

1. Tezimin tamamından kaynak gösterilmek şartıyla fotokopi alınabilir. ☐
2. Tezimin içindekiler sayfası, özet, indeks sayfalarından ve/veya bir bölümünden kaynak gösterilmek şartıyla fotokopi alınabilir. ☐
3. Tezimden bir (1) yıl süreyle fotokopi alınamaz. ■

TEZİN KÜTÜPHANEYE TESLİM TARİHİ: