

CITIZENSHIP AND INTEGRATION: GENERAL CONSIDERATIONS AND SOME POSSIBLE IMPACTS OF THE EU CITIZENSHIP ON (RE)INTEGRATION OF IMMIGRANTS¹

Citizenship is a specific link between an individual (citizen), who possesses a specific legal status, and a (sovereign) state, which gives such a specific legal status to this individual. Still being the basis for certain civil and political rights, citizenship continues to be the basis for democratic inclusion and participation of individuals in public affairs. Consequently, acquiring citizenship of states (of immigration) remains an important element for the (full) integration of immigrants in 'host' societies. For this reason the article presents the concept of citizenship, its historic evolution and its possible implications for the full integration of immigrants.

Currently the EU citizenship cannot be equaled with citizenship of a (sovereign) state. Rather than a replacement for citizenship of a state, it should be observed as a complementary concept, dependent on the citizenship of member-states. However, already at this stage the EU citizenship establishes the right of every EU citizen "to move and reside freely within the territory of the Member States, subject to the limitations and conditions laid down in this Treaty and by the measures adopted to give it effect" (Art. 18 – Consolidated Version of the Treaty Establishing the European Community), "to vote and to stand as a candidate at municipal elections in the Member State in which he resides, under the same conditions as nationals of that State" even if he/she are not citizens of this state (Art. 19), to enjoy diplomatic protection of other EU Member States in the territory of the third state if his/her state is not represented there (Art. 20), "to petition the European Parliament" and to apply to (European) Ombudsman (Art. 21). Consequently, the EU citizenship might be a useful tool for the better integration of immigrants who possess it into 'host' societies in other EU member states.

The author argues that acquiring citizenship is just a step in the process of full integration of immigrants and in developing and promoting active democratic citizenship. Consequently, the EU citizenship can be a useful tool in this process in cases when an individual does possess it but does not possess the citizenship of the EU member state where he/she resides.

Keywords: citizenship (nationality), EU citizenship, integration/reintegration, political participation (especially of immigrants)

DRŽAVLJANSTVO IN INTEGRACIJA: SPLOŠNA RAZMIŠLJANJA IN MOŽNA VLOGA DRŽAVLJANSTVA EU PRI (RE)INTEGRACIJI IMIGRANTOV

Državljanstvo je specifična vez med posameznikom (državljanom), ki ima ta pravni status, in (suvereno) državo, ki tak status državljanom podeljuje. Ker je državljanstvo pravni temelj za nekatere civilne in politične pravice, ostaja pomembna za demokratično vključenost in sodelovanje posameznikov v javnih in zlasti političnih zadevah. Pridobitev državljanstva države, v katero imigrirajo, ostaja pomemben element polne integracije imigrantov v imigrantske družbe. Članek predstavlja koncept državljanstva, njegov zgodovinski razvoj in evolucijo ter njegove možne učinke na polno integracijo imigrantov.

Državljanstvo EU nikakor ni nadomestilo za državljanstvo (suverenih) držav in ga z njim ni mogoče enačiti, zato ga moramo obravnavati kot komplementaren koncept, ki je pogojen z državljanstvom držav članic in je od njega odvisen. Vendar pa tudi tako omejeno državljanstvo EU vzpostavlja pravice državljanov EU do svobodnega gibanja in naselitve na območju držav članic (seveda z možnimi omejitvami na podlagi Pogodbe), do aktivne in pasivne volilne pravice na ravni lokalne skupnosti pod enakimi pogoji, kot jih imajo državljanji te države članice, do diplomatske zaščite s strani drugih držav članic na ozemlju tretjih držav, če država, katere državljanji so, v tej tretji državi nima diplomatskega predstavništva, ter do peticije Evropskemu parlamentu in vloge (evropskemu) Ombudsmanu (18.–21. člen Konsolidirane verzije Pogodbe o vzpostavitvi Evropske skupnosti). Tako je lahko državljanstvo EU koristno "orodje" za boljšo integracijo imigrantov, ki so državljani EU, v imigrantsko okolje v drugi državi članici.

Avtor ob tem poudarja, da je pridobitev državljanstva le korak v procesu polne integracije imigrantov v imigrantske družbe in v razvijanju koncepta aktivnega demokratičnega državljanstva. Pri tem je tudi državljanstvo EU lahko koristna stopnja v procesu integracije imigrantov, ki imigrirajo v drugo državo članico EU.

Gljučne besede: odnosi med Armenijo in diasporo, izgradnja države, demokratizacija

INTRODUCTION¹

We live in a plural, diverse, dynamic and changing world – from a micro environment to the global level. Situations and our perceptions (of these situations and of the world) are constantly changing. Increased mobility of people and migration(s) are important factors that contribute to dynamics and diversities. Often situations are changing faster than perceptions; sometimes they change independently. Concepts, normative framework(s), institutional principles and institutions sometimes do not change at all or evolve very slowly – regardless of the pace of changing circumstances. Although new myths are being produced daily, some historic and social myths persist even when everything seems to be contradicting them. The same might be said also for the (traditional) concepts of citizenship and nation-state as well as for the existing legal and institutional arrangements and models of citizenship and nation-states. Although the myth of ethnic homogeneity of nation-states contradicts our diverse realities it continues to dominate our perception of the ideal social organization.

In a contemporary world and societies – characterized by pluralism(s), diversities and asymmetries of all kinds, of which ethnic, cultural and religious diversities represent only a few dimensions, a segment – diversity management should be at the top of (public, social, political) agendas. However, often this is not the case. The dominant public discourse still continues to glorify homogenous, unified, symmetrical and hierarchical models and institutional structures. But it cannot ignore the reality completely. In this context migrations and migration policies (as burning issues) are being discussed all over the world. Especially in developed countries often these discussions focus on the negative perceptions of immigration and its impacts. Consequently, these discussions point to the massive inflow of immigrants, especially illegal immigrants, problems of the integration of immigrants (especially of those who do not speak the language of the environment, who are poor and uneducated, who do not possess certain skills that are in demand, etc.) and their communities into host societies, their impact on the local culture and its changes, their impact on the unemployment of the local population (that usually does not want to do the jobs that immigrants do), etc. Often they result in demands for more restrictive regulation and management of immigration as well as status and integration of immigrants, which includes also



¹ This article is one of the results of the broader study on integration that I started when I was preparing my paper "EU Citizenship and its Possible Impacts on Integration of Immigrants: The Perspective of Migrants and Diasporas" for the conferences on Integration of Immigrants that was organized by the National Europe Centre of the Australian National University in Graz in 2005 and in Canberra in 2006. This study is also a part of my research within the Research program "Ethnic and minority studies and Slovene studies (Slovene national question)" financed by the Slovenian Research Agency (ARRS) that I am coordinating at the Institute for Ethnic Studies.

stricter conditions for acquiring the citizenship of a state and the naturalization of immigrants.

However, such a fear from and hate of immigrants are emotional and intuitive rather than factual and logical. Taking into account demographic realities, trends and projections in most developed societies the only logical discussion should be how we can manage migrations and ensure the necessary inflow of immigrants to address our problems of aging populations, low birth rates and demands for the labor force in the future, which will be necessary to preserve or improve the current standard of living and level of social development. Changing ethnic and other structures of the population and increasing diversity will require successful diversity management that should include also the integration and adequate protection of immigrants and immigrant communities as well as other minority and marginalized communities.

Integration is a relatively new concept and approach. Integration of immigrants and (persons belonging to other) marginalized communities should replace (or at least complement) traditional concepts of assimilation and segregation that – especially in a long term – have not produced expected and desired outcomes. Additionally, in views of many, assimilation and segregation are outdated and no longer acceptable in democratic societies. Consequently, new solutions have been sought for and a number of different concepts of integration have been and are developed. They try to ensure the inclusion and voluntary integration of immigrants, immigrant, minority and other marginalized communities in a way that would recognize and respect diversity, ensure conditions for the expression and development of different collective identities and cultures based on equal rights and equality as well as the highest standards of human rights. Such a concept of integration was defined their central goal also by the European Union (EU) and its member states that have started to develop their integration policies.

This article explores citizenship and its functions in contemporary societies, paying special attention to the role of (acquiring) citizenship in the process of integration of individuals who do not possess the citizenship of the state where they reside. To provide an adequate theoretical and historic framework it discusses the concept of citizenship and its historic evolution. In this context also the concept of *active democratic citizenship* is being examined, which should enable all individuals residing permanently in a certain territory to fully participate in all social and political processes including participation in elections and democratic decision-making at all levels within a state.

In this context – as our working hypothesis – the article tests the presumption that acquiring the citizenship (of a new, host) country might be a necessary (if not the key) (pre)condition for a full integration of an individual (usually an immigrant) into a society (host, immigrant society) where he or she lives. An

important question appears from the perspective of the concept of *active democratic citizenship*, which in addition to the traditional citizenship of the states of residence might require and introduce also complementary or alternative statuses and/or concepts.

In addition to studying citizenship of sovereign states, the article addresses also the EU citizenship and its possible role in the (re)integration of immigrants in the EU member states. Compared with the citizenship of a specific state the EU citizenship is a different concept and might be considered limited. We could say that in many ways the EU citizenship is more a political than a legal concept. However, it creates a specific basis for political participation of an individual who possesses the citizenship of one member state and consequently the EU citizenship in other EU member states. Namely, the EU citizenship entitles an individual who possesses it to participate in the elections for the European Parliament and in municipal election in other EU member state where they reside. In this context, the EU citizenship might be a useful tool for integration of immigrants possessing it in other EU member states.

Regardless of the importance of the citizenship of the state of residence for the full integration of an individual in a certain society, I would argue that it is just one of (possibly last) steps of “full integration.” If a comprehensive integration policy exists in a certain environment, to a large extent integration of immigrants can be achieved without addressing the issue of citizenship and without acquiring the citizenship of the “new” state (state of immigration). Moreover, the acquiring of the citizenship and political/civic integration do not guarantee individual’s actual and full integration into the host society – which in addition to legal and political integration includes also social, economic and cultural dimensions.

CITIZENSHIP (NATIONALITY)

Citizenship – or nationality, as many international and national documents and legislations and scholars call it – could be defined as a specific (mostly legal) link and relationship between an individual (citizen), who possesses a specific legal status, and a (sovereign) state, which grants and recognizes such a specific legal status to this individual. In a narrower sense, citizenship can be defined as a specific legal status of an individual that determines the relationship between individuals possessing such a status and their state. However, citizenship is much more than just a legal status and link: it determines and establishes the position of an individual in a society by determining his/her (human) rights and freedoms, especially civic and political rights that are granted only to citizens and constitute the basis for citizens’ participation in democratic political decision-making. As such it can be considered the basis for democratic inclusion and full political

participation of citizens in public affairs. Additionally, it establishes relationship between citizens and their state by determining their rights, responsibilities and obligations. In a broader context, citizenship encompasses also social and emotional links between a citizen and a state, including identification of an individual with a state.

To summarize, we could say that citizenship is a special and sometimes the only (mostly legal) link between a sovereign state and its citizens – individuals who live, usually permanently, in a territory of a certain state and possess a special guaranteed legal status.² In many ways, this legal link resembles a contract (between a state and its citizen) that, on the one hand, establishes rights, obligations and duties of the state in relation to citizens and, on the other hand, rights and duties of individual citizens in the relation to the state. In this context, citizenship laws of national-states determine the nature and content of citizenship that is usually defined as a specific legal status, relations and links between a state and its citizen, the rights and duties (obligations) of the citizen and those of the state. Additionally, citizenship laws regulate the criteria and procedure how an individual becomes a citizen of the state (See, e. g.: Brubaker 1989; Donner 1994; Meehan 1993).

As Article 1 of the 1930 *Hague Convention on Certain Questions relating to the Conflict of Nationality Law* states, the regulation of citizenship is considered a sovereign right (*domain reserve*) of every state. Nevertheless, a state is expected to observe basic rules and standards developed by international law.³ Following the general practice in international law, J. G. Starke (1989: 340) describes nationality (citizenship) as:

the most frequent and sometimes the only link between an individual and a state, ensuring that effect be given to that individual's rights and obligations at international law. It may be defined as the legal status of membership of the collectivity of individuals whose acts, decisions and policy are vouchsafed through the legal concept of the state representing those individuals.

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2 Citizenship establishes a link between a person and a state which is permanent, even in a case, when this person no longer lives in the territory of this state. In such a case, international law and national legislations establish rights and responsibilities of a person and a state (e. g. entitlement for diplomatic protection abroad, etc.) (E. g., Starke 1989: 341-347).

3 The most important international documents and agreements on nationality (citizenship) are listed in: *European Convention on Nationality and explanatory report 1997: 24* (footnote 1). International law deals especially with different problems and conflicts of national citizenship laws (e.g. dual or multiple citizenship, disputed citizenship of married women) and cases, when a certain person does not have his or her citizenship (statelessness).

The *European Convention on Nationality* (1997) defines citizenship in Article 2:

a) “nationality” means the legal bond between a person and a State and does not indicate the person's ethnic origin; ...

Decades after its conception authors, including Ruth Donner (1994: 61), still cite the definition of the International Court of Justice in the famous *Nottebohm Case*, which is considered comprehensive and includes main characteristics of citizenship; it reads:

Nationality is a legal bond having as its basis a social fact of attachment, a genuine connection of existence, interests and sentiments, together with the existence of reciprocal rights and duties (*Official report of the International Court of Justice 1955: 23*).

As we mentioned, usually, the term “nationality” is used – in theory and in practice, including international and national legal and political documents – as a synonym for the term “citizenship” (Simon 1999). Both terms are often used interchangeably, but sometimes a distinction can be made that might result in a different status of an individual.⁴ I prefer to use the term “citizenship”, which I consider more value neutral and usually does not imply so many different meanings as the term “nationality”.⁵

Considering its legal nature, citizenship is not a right but rather a specific legal status granted to an individual by a state. For an individual this is a very important status that entitles him or her to certain rights and establishes certain obligations of a state to this individual (e. g., diplomatic protection of its citizen abroad). On the other hand, citizenship creates duties and obligations of a citizen in relation to his/her state. A state might expect from a citizen to respect its laws and social order, to fulfill his/her duties and obligations, such as paying taxes and/or defending a country, etc. Traditionally, it is expected that citizens should show patriotism

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4 As it is the case in the specific practice of the USA with regard to, e. g., inhabitants of Guam who are considered US nationals (in accordance with international law) but not citizens and do not enjoy all citizenship rights (More on this distinction see, e. g., Accetto 1999; European Commission for Democracy Through Law 1998: 23).

5 *Webster's Dictionary* (1983: 1196), for example, lists the following possible meanings of the term “nationality”:

1. national quality or character,
2. the condition or fact of belonging to a nation by birth or naturalization,
3. the condition or fact of being a nation,
4. a nation or national group.”

One could add a list of additional meanings of the term “nationality”, but for the purpose of this contribution and in the context of diversity management we shall mention at least two additional specific ways in which this term is used:

- (i) to express one's belonging to a certain ethnic group and his/her ethnic identity;
- (ii) to define a specific ethnic group (ethnie), namely an ethnic/national minority (E. g., Breton 1981).

and express loyalty to their states (of citizenship) – which often is one of criteria and/or (pre)conditions for acquiring citizenship by naturalization.

Certain confusion regarding the legal nature of citizenship as a specific legal status might arise from the provisions of Article 15 of the *Universal Declaration of Human Rights* (1948) that reads:

- (1) Everyone has the right to a nationality.
- (2) No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.

Additionally, Article 24 of the *International Covenant on Civil and Political Rights* (1966) states in its paragraph 3 that “[e]very child has the right to acquire a nationality”.

However, a closer analysis of these provisions shows that they speak of the right to acquire citizenship. They do not define citizenship itself as a right explicitly. Everybody shall have the right, under (equal) legally determined conditions, to acquire citizenship – *ex lege* or by naturalization. Nevertheless, it is a state that in accordance with internal law (following the principle of the rule of law) and based on national legislation grants or does not grant its citizenship to an individual. In accordance with internal law, a state might even deprive its citizen of citizenship.⁶ In other words, it is a state’s sovereign right to make these decisions. Consequently, international law prohibits explicitly only the arbitrarily deprivation of citizenship or the denial of one’s right to change one’s citizenship.

It is in this way that we should understand also the provisions of Article 4 of the *European Convention on Nationality* (1997), which purport to prevent statelessness.⁷ Its provisions are in accordance with the basic principles that exist for more than a century and are still relevant:

- nobody shall become stateless,
- everybody shall have only one citizenship (nationality),
- everybody shall have the right to change one’s citizenship (nationality),
- for persons born abroad the principle of (limited) passing of citizenship (nationality) from a generation to a generation should be applied *ad infinitum* – mostly to prevent possible statelessness (e. g., Donner 1994).

6 In accordance with internal law, the deprivation of citizenship might be admissible under international law even in cases that would lead to statelessness.

7 In this context we shall stress that nobody shall be considered stateless as long as he/she formally possesses citizenship of whatever country, although there are no genuine links between this person and a respective state.

There has been a certain evolution of these principles. At least some states are less reluctant to tolerate or accept dual or multiple citizenship of an individual as consequences of his/her specific individual and family history. Nevertheless, as a rule states still prefer single citizenship, which, traditionally, they connect with undivided loyalty of a citizen to his/her country. Consequently, they might demand renouncement of his/her previous citizenship by an individual who acquires a new citizenship by naturalization, of which part is usually also taking the oath to the new state of citizenship. However, even those states that tolerate dual or multiple citizenship of an individual, consider such an individual exclusively their citizen when he/she is in the territory of a state of which citizenship he/she possesses.

Considering the importance of citizenship for an individual, the acquisition of citizenship is extremely important. Three main principles have been developed to determine citizenship of a certain person: *ius soli* – based on a territory where a person is born; *ius sanguinis* – based on the nationality of parents at birth; and *ius domicilii* – based on the permanent residency of the parents and child.

Following the mentioned principles, citizenship might be acquired in three principal ways:

1. By birth according to *ius soli*, *ius sanguinis*,⁸ or according to both – to prevent statelessness.⁹ In some cases also *ius domicilii* might be used.
2. By naturalization in accordance with national laws on citizenship/nationality, based on the application to state authorities usually following the marriage with a citizen of a certain state or lasting habitual/permanent residence.¹⁰
3. By option, registration or entry into the public service of the state concerned in case of the change of the legal status of a certain territory. “The inhabitants of a subjugated or conquered or ceded territory may assume the nationality (*citizenship*) of the conquering state, or of the state to which a territory is ceded.” There is a dispute whether a state may “naturalize

8 Based on *ius sanguinis*, a child, although he or she was born abroad, can be or become a citizen of a certain state if his or her parents were citizens of this country in the time of the child’s birth; in some cases it is sufficient if at least one parent was a citizen of this country.

9 Statelessness would occur if a child is born in the territory of a state that determines the principle *ius sanguinis* as the only way for acquiring citizenship by the birth (*ex lege*) to parents who are citizens (nationals) of a state that follows only *ius soli*.

10 Though there is no duty of states to recognize a nationality acquired by a person who has no genuine link or connection with the naturalizing state according to the decision of the International Court of Justice in the *Nottebohm Case* (Second Phase) (*Official report of the International Court of Justice* 1955: 4).

persons who do not have their habitual residence in that state's territory" (Starke 1989: 344).

In theory, citizenship belongs or, at least, should belong to all the people who live permanently in a territory of a certain state and/or who qualify for it on the basis of general conditions determined by the national law. Although citizenship is generally declared an ethnically neutral category, belonging to a certain distinct community (ethnic origin, blood-links) could be an important criterion for the acquisition of citizenship of a certain nation-state *ex lege* or by naturalization. In some cases, following *ius sanguinis*, states might introduce a simpler procedure for naturalization of persons who ethnically belong to a certain ethnic community (usually to a titular nation in a nation-state) even if no other genuine link between an individual and a state exists. Such a practice of certain nation-states reflects their view of the role of a nation-state in preserving and developing the identity and culture of a titular nation.

HISTORIC EVOLUTION OF CITIZENSHIP AND ITS IMPORTANCE FOR SOCIAL INTEGRATION AND POLITICAL PARTICIPATION OF AN INDIVIDUAL

Historic emergence of first states changed a nature of prehistoric societies and established a specific relationship between a state (as a specific form of social organization) and individuals who lived in it: considering their social nature and structure members of prehistoric societies became subjects of their state(s). This historic development changed also the nature of our history: it became the history of states. More precisely, traditional history became the history of their rulers (monarchs) that did not pay much attention to economic and social situation and/or to common subjects of states; history (historic science) has started to emphasize the importance of social and economic history and of personal histories only recently and slowly (See, e. g., Ambrosius & Hubbard 1989; Gellner 1988; Hobsbawm 1997; Hobsbawm & Ranger 1998). History tells how specific states and empires emerged, developed, evolved, transformed and ceased to exist in the process of historic development. In this historic process the relationship and links between individuals and (their) states evolved as well.

Relatively quickly, during the Antiquity period, states began to differentiate between citizens (natives, their genuine subjects) and aliens (outsiders, foreigners), who were brought to or resided in the territory under their control (jurisdiction). The distinction between citizens and non-citizens, no doubt, existed in city-states of ancient Greece. A Grecian city-state (*polis*) reserved certain rights, privileges and duties only to its citizens, that is, free individuals (men) born into the polis. This concept of citizenship (that served also as the basis for democracy

in the city-state of Athens) was very exclusive (Turner & Hamilton 1994: 329) The "right" to citizenship was "not contingent upon residence and . . . [was] not earned. In this view, citizenship is a kind of property right". Nevertheless, in very exceptional circumstances and under restrictive conditions, the citizenship of city-states could have been earned as a special privilege, "particularly by risking one's life in the military service of the city". However, a city-state did "not normally make it possible for outsiders to achieve citizenship by performing some routine service or by attainments that ... [complied] with certain universal standards" (Gouldner 1994: 335–336).

Adapting the concept of citizenship to its need, initially, the Roman Empire used it as a device for distinguishing between the Romans (citizens – *cives Romani*) and other inhabitants (non-Romans, foreigners) of the empire. Civil Law (*ius civile*) was initially reserved only for Roman citizens, while *ius gentium* (their specific native, tribal law) was used for other inhabitants of the empire. Later, as a reward for their loyalty, contribution to the Empire and their Romanization (assimilation into Roman culture and society) citizenship was extended to include large numbers of people in the empire thereby ensuring their permanent loyalty to the Empire. Formally, this gave new Roman citizens the right to exercise political and civil privileges that most of them were unlikely to exercise. In turn, the Empire demanded their loyalty and expected that they would exercise their duties. The concept of Roman citizenship transformed throughout the existence of the Empire. Finally, Emperor Diocletian transformed Roman citizens into subjects, when he adopted the title "*dominus*" (master) and introduced the "dominate". With the fall of the Roman Empire the concept of citizenship became less important in medieval Europe. Individuals were subjects of their feudal lords, who demanded their allegiance. Feudalism (feudal relations) determined status of individuals, groups and classes. Medieval states were often only loose autarkic social forms, characterized by the rivalry of feudal lords who were vassals of the monarch. However, accompanying economic and social development concept of citizenship in some city-states (mostly in the Mediterranean and especially in Italy, but also in other European cities that developed as economic centers) was used by prosperous merchants as a means of protection against demands by feudal lords. Building on the Greek, Roman and some medieval traditions and on the Renaissance,¹¹ the Enlightenment was essential for the development of the modern concept of citizenship. Nevertheless, the crucial historic turning-point in this development was the period of the formation of modern nation-states. The development of early capitalism that had begun already in the period of the late



¹¹ Among many authors who contributed to the development of modern political thought and the concept of citizenship, we shall mention, at least, Saint Thomas Aquinas, Dante, Machiavelli, Bodin, Grotius and Hobbes, etc.

feudalism initiated the gradual transformation of a feudal society into a capitalist society. Developing capitalist production that enabled the creation of (larger) economic communities, conditioned also the formation of modern European nations as specific social phenomena of the capitalist epoch (Hobsbawm 1990: 9). However, as a historic turning point, the 1648 *Peace of Westphalia* ended the medieval period in Europe and formally established the modern international community of sovereign states.¹² The contemporary (political) philosophy and developing theory of liberal democracy laid philosophical and theoretical foundations for a new, capitalist social order and for the formal introduction of democratic political systems.¹³ Historic turning-points in this historic process were bourgeois revolutions in the Netherlands, England, America and especially the French revolution of 1789 (e. g., Hunt, Lynn 1996). The first article of *The Declaration of the Rights of Man and Citizen* adopted in the early months of the French Revolution by the National Assembly on 26 August 1789 proclaimed that “[m]en are born and remain free and equal in rights. Social distinctions can be based only upon public utility”. The proclamation of the freedom and equal rights of individuals, although at the time limited to men, was a central precondition for the introduction and development of (political) democracy.

In specific historic circumstances in Europe that due to colonial order dominated the world the process of the formation of European nation-states went hand in hand with the formation of modern European (ethnic) nations (ethno-nations) from the sixteenth and the seventeenth century on.¹⁴ In this process, the existing states tried to create their (titular) nations if they had not established them by that time; concurrently, established and emerging nations without existing nation-states strove to form their nation-states (Gellner 1983: 6–7, 53–58). The process



12 The Peace Treaties of Westphalia of 1648 ended the Thirty Years War (i. e. the religious wars between the Protestants and Catholics in Europe). The treaties reshaped the existing international community by establishing the modern international community. This brought an end to the feudal autarky in Europe. These treaties laid foundations of the legal status of sovereign states in the international community and established principles for relations and cooperation among them. They marked also the beginning in the development of the protection religious minorities. These treaties abolished the previously existing principle “*cuius regio, eius religio*” that determined the religion of the population on a certain territory by the religion of its ruler. They introduced the principle of freedom of conscience and religion and established the obligation of states to grant toleration and self-government to distinct religious communities (See, e. g. Baron 1985: 3).

13 Among others, Descartes, Hobbes, Diderot, Locke, Jean Jacques Rousseau, Franklin, Jefferson, Kant, Hegel, and later de Tocqueville, John Stuart Mill and Marx were, no doubt, key philosophers and political thinkers who influenced historic development of capitalism and (liberal) democracy with their theories and theoretical concepts.

14 The fact that the process of formation of modern nation-states in Europe went on simultaneously with the process of formation of modern European ethno-nations produced certain terminological problems in some languages (e. g., English, French) that use the same term “nation” to describe an ethno-nation as a specific ethnic community and a state as a specific social organisation and structure. To avoid possible misunderstandings the term “nation” is used here only to describe an ethno-nation as a specific ethnic community.

of nation-state formation intensified and reached its peak in the nineteenth and twentieth century; however, it has not ended and still continues in different parts of the world. Also from the perspective of the (historic) evolution of citizenship, it is important that states acquired their ethnic identity and became nation-states of a certain (titular) ethno-nation.¹⁵ In the international community of nation-states, the nation-state was and often still is considered the only appropriate mechanism for the realization of “national interests” – both within the state and in the international community (See, e. g., Kellas 1998; Stavenhagen 1990). States are members of the international community and the only (full) persons of international law. This is an important reason why ethnic communities without their own nation-states often still strive for the establishment of their nation-states.

When a state transformed into or was established as a nation-state of a certain titular nation, the language, culture and history of this dominant ethnic community in the state became the official language, culture and history of this state. Sometimes the dominant religion became the official state religion. This created an illusion of linguistic, ethnic, cultural and religious homogeneity in established nation-states, although a certain level of ethnic, cultural and religious pluralism has always existed in every society. However, the myth that nation-states were ethnically homogenous was accepted by people and is still prevailing. In this context, nation-states are perceived as “single-nation-states” (one-nation-states). Consequently, the existence of ethnic, linguistic, cultural and even religious pluralism and diversities is often considered a problem, rather than recognized as normal phenomena and state of affairs (See, e. g., Mann 1990; Žagar 1995: 143–145, 150–153, 157; Žagar 2007). The same is true regarding migrations that contribute to increasing diversities. This explains also the reluctance of states to grant their citizenship to immigrants who apply and the usual specific requirements of knowing and accepting the language, culture and history of the state for applicants for naturalization.¹⁶

Simultaneously with their transformation into modern nation-states, contemporary states underwent also democratic transformation when the principle of



15 A nation-state is a specific form of social organization and government. Nevertheless, as Weber pointed out, a state is (above all) an agency within society, which possesses a monopoly over legitimate violence (See, e. g., Weber 1989; Weber 1922). As such it is a powerful tool for the rule of the ruling class (elite). However, a modern nation-state as a welfare state, especially in European traditions of the twentieth century, became an important (social) service of its citizens that provides for social, communal and economic infrastructure, certain basic needs and services (e. g., education, social security and welfare, health care and service, etc.).

16 Often states require applicants for citizenship in naturalization process to attend courses on the national language, culture and history; sometimes the applicants are required to pass special exams/tests on the official language of the state (where they are expected to show at least basic command of the language that enables their daily communication) and often they have to show their knowledge of the political system. Usually, at the occasion of naturalization the applicants have to take oath, thereby expressing their loyalty to the state.

sovereignty of the people as the basis of (liberal) democracy was formally introduced and implemented. The introduction of democracy changed the position and role of individuals – former subjects who became citizens – fundamentally. In this context, citizenship became a legal title for political rights of individuals that enabled their participation in democratic political processes. Initially, similarly as in the case of citizenship, states were very restrictive in granting the access to political participation; it was only gradually and with hesitation that states abolished different restrictions (e. g., property census, exclusion of women, etc.) that excluded large sections of people/citizens from political participation. Historic development and gradual democratization conditioned the evolution of the concept and practice of existing nation-states that enabled also the development of the protection of minorities and the introduction of new rights (e. g., economic, social, cultural rights).

Constitutions of democratic countries declared “the people” the sovereign.¹⁷ Individuals were no longer subjects. Nevertheless, “the people” – defined as citizens of respective states – did not include everybody (Hinsley 1986: 126–157). For practical reasons, governments expected that citizens met certain preconditions for democratic participation. The ability to speak the official language, evidence of respect for existing legislation and manifestation of observing history and traditions, became preconditions for granting citizenship. Although democracy and citizenship were considered ethnically and culturally neutral, the actual ethnic determination of (single)nation-states conditioned these concepts. Furthermore, the fact that some languages used the same term “nation” to describe the ethnic community and to describe its (single)nation-state conditioned new terminology, thereby, the term “national” was introduced instead or in addition to the term “citizen” and the term “nationality” was used instead or in addition to the term “citizenship” (Simon 1999).

To understand fully the relationship between an individual citizen and a state we have to consider also the other dimension of sovereignty: “Sovereignty of a state” means the actual capability of a government: to control the territory and population of a state, to enter into international relations with other states, to conclude and realize international agreements (treaties), and to comply with international law. The external – international dimension of the sovereignty of a state establishes it as a person of international law and defines its (formally equal) position in the international community. In this context, the external (international) dimension of sovereignty of a state is often understood simply as its inde-



17 ‘Sovereignty of a sovereign’ can be described as a supreme and absolute power and/or authority of final decision by the ruler who is “recognized both as competent to decide and as able to enforce the decision” (Crick 1972: 77).

pendence (Akehurst 1984: 15–16; Jennings & Watts 1992; Nguyen, Oppenheim 1948: 113–120). For every citizen it is important that states provide diplomatic protection to their citizens abroad, whereby they should exercise their right in accordance with the international law.

However, it is the internal dimension of sovereignty that is truly important for the relationship between individuals (citizens) and (their) states. Democratic states could be described as a specific type of social organization and democratic institutions. Their political systems should provide mechanisms and framework for the realization of sovereignty of the people and their democratic participation. Democratic constitutions and legislation proclaim the rule of law as the basic principle upon which the structure and functioning of a state and its institutions are designed and organized.¹⁸ Consequently they determine the structure and institutions of a state, their competencies (rights and duties/obligations, but also limitations), functions and relationship, rules of procedure and political process(es). However, we should consider the determination and guarantee of human rights and freedoms constitute the most important part and content of modern democratic constitutions and the basis for democracy. Human rights and freedoms establish and provide the (normative) framework for the status, position and social role of an individual in a specific society, which includes also the regulation and (normative) framework for direct and indirect participation of individuals in democratic political processes and institutions; most frequently, full political participation is limited to citizens only. This is why citizenship might be considered that important for a full integration of an individual into a society. However, only a small number of human rights and freedoms should be limited to citizens only. Human rights and fundamental freedoms proclaimed, established and guaranteed by constitutions, laws and international legal documents are the most important and effective protection and guarantees for individuals in their relationship with states.¹⁹ From a perspective of an individual and considering the actual balance (of power) between an individual and a state, we can conclude that despite all constitutional, statutory and other limitations that were designed



18 Traditionally, there has been a vivid scholarly and political discussion on the (principle of the) rule of law – including its content and substance, nature, framework and procedures, social role and implications, etc. (See, e. g., Barnett 1998; Chevallier 1992; Dias 1997; Hutchinson & Moynahan 1987; Krawietz & Pattaro & Erh Soon Tay 1997; Morin 1996).

19 In this context, constitutions and national legislation should follow International Law (especially binding instruments/documents and basic principles) and the established international standards on human rights. More on human rights and fundamental freedoms, especially in the international law, and issues being discussed in this context, see, e. g., Kymlicka 1995; Lebreton 1997; Lillich & Hannum 1995; Martin 1995; Meron 1992; Mills 1998; Sellers 1996; Sieghart 1995; Steiner & Alston 1996; Thornberry 1990; Vasak 1978; Wallace 1997; Waldrauch 2003; Žagar 1997. Regarding the protection of minorities see e. g., Pentassuglia 2002; Thornberry & Estébanez 2004; Lantschner, Marko & Petričič 2008.

to protect an individual and limit the power of state in relation to an individual, a state remains a very powerful institution, which among others possesses a monopoly of legislation (constitutions, laws, statutes and bylaws, etc. regulate (almost) all spheres of life), organized repression, violence and arms (i. e., judicial system, police, army/military). It is a state that regulates also citizenship and decides on citizenship issues, observing a set of rules and minimal standards that international (statutory and customary) law has established. In Rousseauan tradition, states assume that citizens' consent exists regarding the structure, competencies and functions of a state. Consequently, states assume and demand loyalty of their citizens, which is evident also in citizenship legislation.

Considering the existing diversities in modern societies we might point out and criticize the fact that the existing constitutional and legal systems – built upon the myth of ethnically homogeneous single-nation-states – still do not recognize and reflect the existing asymmetries, regional and local characteristics and differences, linguistic, ethnic, cultural and religious pluralism, complexity and rich diversity of modern societies. Consequently, the extant model of a single-nation-state (by establishing the dominant position of a titular nation) often generates nationalism and fuels ethnic conflict in some states (See, Gellner 1983: 3–5; Hobsbawm 1990: 9–12). There is a need to develop a multi-ethnic (or, at least, ethnically neutral) concept of a democratic state that would recognize, reflect and regulate (in a democratic way) the existing diversities and asymmetries (See, e. g., Kymlicka 1996; Tamir 1993). This is in line also with the already mentioned European Convention on Nationality, which in Article 5 calls for a neutral concept of nationality (citizenship) built on the principle of nondiscrimination. Such a development would be important also for immigrants and their full integration into their new societies.

Finally, we should note that citizenship is not just a status, but also set of citizens' rights based on this status. Considering different types human rights (he lists civic, political and social/economic ones), T. H. Marshall (1998) considers citizenship (nationality) a (legal) status given to individuals who are full and equal members of a certain national community (organized as a state) that is the basis for citizens' rights, especially political, but also civic and social/economic rights, which derive from this community and, in turn, enable full participation of citizens in it. Although, a number of human rights that were traditionally linked with a citizenship of a certain state is no longer reserved just for citizens, but belong to all individuals, status of citizenship still remains important, especially because of those rights that are still linked with and dependent on citizenship²⁰ (Howard 2003: 5–8).



20 There exist different views regarding this issue and the importance of citizenship in general and, especially, for immigrants and those who seek to gain citizenship of a specific state in which they live or with which they

From the perspective of full integration of an individual in social and political life we have to consider also other dimensions (especially social, economic and/or political) and contents of citizenship. In this context we can observe citizenship as a process, a permanent working relationship between and individual and a state, but also among individuals, citizens who constitute a body politic – the people defined as the titular of sovereignty in democracies. We might speak of the political dimension of citizenship and of the concept of (active) democratic citizenship that presumes active participation of citizens in political processes. In its nature *active democratic citizenship* should be inclusive and should provide also adequate conditions and mechanisms for the participation of (persons belonging to) minorities (See, e. g., Special Delegation of Council of Europe Advisers 2000). As a process citizenship is loaded with (positive and negative) values, attitudes, emotions, feelings, etc. that are manifested in different ways, among others in political programs and ideologies and other concepts designed and used to mobilize people and/or to generate political action. It is not surprising that states are especially interested in promoting patriotic values, emotions and attitudes that should strengthen the feeling of belonging to their states among their citizens.

THE EU CITIZENSHIP

Traditionally, regulating and granting citizenship was and still is considered a sovereign right of every sovereign state. Consequently, international law has determined only some basic standards and rules that helped prevent statelessness and reduce dual/multiple citizenship. Most states still follow these principles and views, which is usually supported also by public opinion.

However, in the past two decades we can detect some new developments and a certain evolution in the perception of citizenship and citizenship policies. These developments might be important also for international migrations and for the integration of immigrants in their new host societies. Among them we should mention three:

- states have become less reluctant to accept dual/multiple citizenship;
- as the result of democratic evolution in Europe (especially in the context of democratization in Central and Eastern Europe) a new concept of *active democratic citizenship* emerged that is promoted especially by the Council of Europe. In addition to legal dimensions and status this concept stresses

are connected. For these and related issues, see, e. g., Aleinikoff 1999; Aleinikoff & Klusmeyer 2002; Castles & Davidson 2000; Feldblum & Klusmeyer 1999; Heater 1996; Heater 2004; Jacobson 1996; Koslowski 2000; Soysal 1994.

the contents of diverse dimensions (such as social, economic, cultural, political, etc. dimension) of citizenship and their importance for the full integration and democratic participation of an individual in diverse societies;

- a new type of citizenship emerged within the European integration processes: the EU citizenship.

Dual and/or multiple citizenship is no longer considered exclusively a deviation or problem by states and a certain part of the public as it was the case in the past, when it was considered a security risk or at least a possible show of lack of loyalty. Sometimes it was seen even as the expression of disloyalty. With this gradual change in the attitude of states the number of dual and multiple citizens has increased worldwide. We can hope that the increased number of dual and multiple citizens – who have their personal ties, connections and interests as well as their legal status in two or more states – will contribute to the intensified communication and cooperation among these societies at the personal level thereby stimulating also other dimensions of international relations and cooperation. Additional channels of communication and cooperation and personal networks and connections can be important supports for the official cooperation and relations among states that can contribute to the reduction of tensions and conflicts within the international community.

The evolution of the concept and perception of citizenship of states has resulted in some new approaches to citizenship that include also the concept of *active democratic citizenship*. In comparison with traditional approaches and perceptions this concept pays less attention to the legal dimensions and status, while it stresses other dimensions that contribute to the full integration of an individual into a respective society – searching for diverse ways and means for the possible integration also of those individuals who do not possess a citizenship of the respective state of their residence (See, e. g. Bauböck 1994, 2004). In this context we should mention also discussions on new concepts and types of citizenship that would transcend the existing concept of citizenship of individual states – including ideas of and proposals for global and/or universal citizenship (See, e. g. Heater 1996; Žagar 1999).

Some steps have already been made in this direction. Among them we should mention also the EU citizenship that will be addressed in this section. In many ways, including its current nature, the EU citizenship is more a political and social concept than a legal issue and status. Consequently, it cannot be equated with the traditional citizenship of a (sovereign) state. The EU citizenship is not a replacement of the citizenship of a state and does not guarantee the same legal status of an individual. However, the EU citizenship encompasses some characteristics of the traditional citizenship of sovereign states. In this context the EU

citizenship can be observed as a complementary concept. Namely, according to Article 17 (Paragraph 1) of the *Consolidated Version of the Treaty Establishing the European Community* it is dependent upon the citizenship of member-states: “...Every person holding the nationality of a Member State shall be a citizen of the Union. Citizenship of the Union shall complement and not replace national citizenship.”²¹

Heater (2004: 103–104) defines four phases in the development of the “European citizenship”: The beginning of the first phase marked the adoption of the *European Convention on Human rights* (of 4 November 1950 with the official title *The Convention for the Protection of Human Rights and Fundamental Freedoms* that entered into force in 1953) that introduced the first European mechanisms for the protection of human rights and contributed to the development of human rights culture and consciousness of people in member states. The Council of Europe and its system with their contributions and efforts in the field of human rights were the key actors in this process. The second phase was the introduction by the *Treaty of Paris* in 1979 of the right of citizens of member states to vote and to be elected in the elections for the European Parliament, which – in a way – was the actual introduction of European political citizenship before the institution of the “European citizenship” was formally introduced. The third phase was marked by the practice and policies of the European Communities, EU, European Commission and other European institutions and the decisions of the European Court that have established the body of human rights, including social and economic ones; the fourth phase started with the formal introduction of the citizenship (Articles 8–8e) of the EU by the *Maastricht Treaty* (signed in February 1992 and formally entered into force on 1 November 1993).

The formal introduction of the citizenship of the EU established a direct link and connection between citizens and the institutions of the EU, especially the European Parliament, which gave citizens a certain say in and influence on decision making and functioning of the EU institutions. We could say that it established a dynamic concept of the EU citizenship that made EU citizens active participants in the European (supranational) integration processes (Jessrun d’Oliviera 1995: 60). This concept has undergone a certain evolution since its formal introduction and is likely to evolve further in the future. However, in the foreseeable future, regardless its certain new dimensions and contents, we could expect that the EU citizenship will coexist with and complement the traditional



21 For the regulation of the EU citizenship see: Part Two: Citizenship of the Union of the Consolidated Version Of The Treaty Establishing The European Community (Official Journal of the European Communities, C325/24. 12. 2002). (See also: <<http://europa.eu/eur-lex/en/treaties/selected/livre203.html>, 25 November 2008>) For the provisions directly relevant for the EU citizenship see Appendix 1.

citizenship of the EU member states. This can be guessed also from the provisions on the EU citizenship in the *Treaty establishing a Constitution for Europe* and discussions that accompanied its development. Although this treaty will never enter into force, it still provides some indications regarding the sentiment and trends in discussions on the future development and regulation of the EU citizenship. These trends and approaches have continued also in determining the *Lisbon Treaty* of 2007 that is (at the end of 2008) still in the complex and difficult process of integration, which was marked especially by the “No” vote of the Irish referendum.²² Interestingly, in discussions following the rejection of the treaty on the referendum in the Republic of Ireland the EU citizenship has not been one of the important topics regarding the future of the EU. Consequently, we can expect that in the foreseeable future the EU citizenship will remain as it is and coexist with and complement the traditional citizenship of the EU member states.²³

THE CONCEPTS AND MODELS OF INTEGRATION AND INTEGRATION POLICIES AND POSSIBLE IMPACTS OF CITIZENSHIP

Integration seems to be one of catchwords in discussions of the present day. However, this term can have several meanings. Usually in the European context it is used in connection with the EU. More precisely, the European integration refers to the intense processes of economic, political and institutional cooperation of (initially Western) European states after WW II that resulted in the EU as well as to the current functioning and development of this integration. Similar processes of international integration (to a larger or smaller extent modeled upon the EU) can be found also in other parts of the world. Speaking more generally, integration refers to the inclusion in diverse contexts. From the perspective of the integration of individuals and distinct collective entities it describes processes of their recognition and (voluntary) inclusion (following the principles of equality and justice) in the respective environments where they live. In this context immigrants and persons belonging to minorities (often marginalized and disadvantaged in



22 See e. g., Consolidated versions of the Treaty on European Union and the Treaty on the functioning of the European Union (Official Journal of the European Communities, 2008/C 115/01), Consolidated version of the Treaty on European Union, TITLE II: PROVISIONS ON DEMOCRATIC PRINCIPLES, Article 9 that reads: “In all its activities, the Union shall observe the principle of the equality of its citizens, who shall receive equal attention from its institutions, bodies, offices and agencies. Every national of a Member State shall be a citizen of the Union. Citizenship of the Union shall be additional to national citizenship and shall not replace it.” <<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2008:115:0001:01:EN:HTML>, 30 September 2008>

23 For accurate, relevant and constantly updated current information on the EU citizenship and legal provisions on the EU citizenship see, e. g.: European Union citizenship, a wide set of rights and obligations <http://ec.europa.eu/justice_home/fsj/citizenship/wai/fsj_citizenship_intro_en.htm, 25 November 2008>

comparison with other parts of the population in a certain environment) are traditional target populations of integration policies and measures.

Considering several definitions of integration in scholarly literature²⁴ I have developed the following working definitions (and theoretical models) of ideal full integration and integration policies for the purpose of my studies and this article: Integration is a (continuous and gradual) process of equal, voluntary and full inclusion of all individuals, especially immigrants, persons belonging to ethnic or other minorities and/distinct groups and communities into their societies, which includes also voluntary and equal inclusion (integration) of distinct communities and groups. The foundation and key criteria of the full integration are human rights and principles of equality and justice. Defined that way the equal, voluntary and full inclusion should be considered the goal of integration that might be realized with adequate integration policies. Consequently, adequate integration policies could be defined as the sums of principles, goals, strategies, policies, measures and activities that should stimulate such an inclusion and integration of all individuals into contemporary open and democratic multiethnic and plural societies that recognizes and pays respect to the existence of all diversities thereby enabling equality and equal position of all individuals and distinct communities. Considering their social position (usually caused by their marginalization and discrimination against them, and problems in their economic, social, political and cultural inclusion) integration policies should pay special attention to the integration of immigrants and persons belonging to minorities and/or marginalized communities. However, in addition to measures for the integration of all individuals a truly successful integration policy in diverse societies should include also measures that address and enable the inclusion, equality and equal positions of minorities and other distinct communities as collective entities. In this context integration and integration policies should not only declare equality, prevent and combat discrimination, social exclusion, isolation and marginalization of individuals, minorities and distinct communities/groups, but should spell out, develop and promote measures, activities and active policies that would facilitate their (equal) integration without assimilation pressures to give up their specific ways of life and/or identities.

Such integration and integration policies should be based on the highest standards of human rights and fundamental freedoms – including minority rights, on the highest standards of minority protection and on the promotion of multiculturalism and/or interculturalism. They demand an active role of the respective state that should – considering the existing possibilities, resources and capabilities



24 For a broader list and overview of different definitions of integration and concepts built upon them see, e. g. Bešter (2006: 13–48).

ties – ensure, promote and develop adequate conditions for voluntary, holistic, equal and full integration in all spheres of life. Integration policies should be continuous democratic processes that request permanent active and equal participation of all spheres of society, including immigrants and persons belonging to minorities and/or distinct communities/groups in all phases. In order to be effective and adequate, integration policies need to evolve and develop constantly through a process of evaluation taking into account developments and changing circumstances in a specific society (Žagar 2002: 149). In my view, integration and integration policies are important segments of diversity management in contemporary plural, diverse and asymmetrical societies.²⁵

The presented view of integration and integration policies exceeds initial perceptions that saw and defined integration predominantly as the integration of (individual) immigrants into their host societies, often – as it was the case with the concept of accepting guest workers – limited just to their integration into labor markets. Gradually, the concept evolved, expanded and started to include also other spheres of life. In developed immigrant societies it started to complement and/or in some cases replace policies of assimilation usually aimed at achieving ever greater cultural homogeneity of these societies by promoting the traditional dominant cultures in these environments and by assimilating everyone (more precisely immigrants and those who did not “belong” to the dominant ethnicity in nation-states usually defined as the titular nation) into the dominant cultures. This is consistent also with the evolution of human rights that made formerly acceptable approaches of forced assimilation unacceptable and the violation of human rights.²⁶

The presented definitions of integration and integration policies are used also in the analysis of the role of citizenship in the process of integration. However, it is important to note again that these definitions are just two in the number of diverse definitions that can be found in the scholarly literature, political and legal documents. Sharing certain common characteristics these definitions might differ substantially in details and their specific dimensions, reflecting specific views and aims of their creators. Among the most frequently cited definitions I would single out the definition of integration of immigrants by the ECOSOC (UN Economic and Social Council), which in 1952 described integration as a:

gradual process by which new residents become active participants in the economic, social, civic, cultural and spiritual affairs of a new homeland. It is a dynamic process in which values are enriched through mutual acquaint-



²⁵ Integration process and process of integration policies is presented in a scheme in Appendix 2.

²⁶ For a more comprehensive discussion on the concept of integration, its evolution and current perceptions of integration see, e. g., Žagar (2008).

tance, accommodation and understanding. It is a process in which both the migrants and their compatriots find an opportunity to make their own distinctive contributions (Cited from: Canadian Council for Refugees 1998).

As mentioned above I believe that the concepts of integration and integration policies that I am advocating should replace or – at least – complement traditional concepts of segregation and assimilation of immigrants and all (other) “Others” that are in their characteristics and identities different from the majority population or dominant social structures. However, one should be aware only a few components of these theoretical concepts of integration and integration policies are being implemented in diverse practices of integration and actually existing integration policies of states and other communities, especially local communities.

Contrary to several concepts, models, policies and practices of segregation and assimilation in different environments and historic epochs that all stated the reduction of diversity in and homogenization of specific environments and communities as their central goals, diverse concepts of integration and integration policies recognize and accept the existence of pluralism and diversity in contemporary societies. However, in accordance with the traditional concept of single nation-states perceived as ethnically and socially homogenous entities, goals of homogenization and “unforced” assimilation were acceptable also for early concepts and policies of integration, while already at that stage they rejected involuntary and forced assimilation and segregation. Newer concepts reject assimilation and segregation altogether, claiming that even voluntary assimilation and/or segregation of individuals usually is stimulated and forced upon by marginalization and the unacceptable direct and/or indirect, visible and/or hidden discrimination of “Others”.

The existing – theoretical and actual – concepts and models of integration and integration policies as well as strategies, programs and practices of integration can be schematically described and classified as liberal (civic), communitarian (or multicultural) and liberal pluralism models of integration (See, e. g., Nikolić 2006: 10–20). It is not surprising that modern concepts of integration have been developed relatively recently – after WW II and especially since the 1960s and 1970s. The main common characteristics and goals of modern concepts, models, policies and practices of integration are or – at least – should be the recognition and respect of diversities and equality as the basis for voluntary and equal coexistence, cooperation and development of all individuals and distinct communities in a certain plural environment. Consequently, democracy, human rights, fundamental freedoms, equal rights, equality as well as the principle and adequate policies of nondiscrimination are the common foundations and elements of all models of integration. Citizenship is especially important and relevant for traditional liberal-civic models of integration, which Schnapper advocates and describes as:

[T]he nation is best defined by its aim, which is to *transcend through citizenship particularities*, whether they be biological (or perceived as such), historical, economic, social, religious or cultural; to define the citizen as an abstract individual, without particular identification or label, below or beyond his concrete characteristics. What makes the modern nation specific is that it integrates all populations into a community of citizens and it legitimizes the action of the State – its instrument – by this community; so it implies universal suffrage – *all* citizens involved in choosing their governments and judging the way power is exercised (Schnapper 1995: 184).

Such liberal-civic models of integration pay no importance to ethnic, cultural, linguistic, religious and other diversities in a plural society; they strictly follow the principle of nondiscrimination and absolutely equal treatment of everybody (e. g., Rawls 1999: 11). These models of integration consider all mentioned differences a private sphere of every individual believing that they have no influence over the status of individuals and their situation and position in the public sphere. What matters for the full integration and political participation of individuals is the citizenship of a respective (nation) state. Consequently, one would expect that states that follow liberal-civic models of integration would design policies and measures that stimulate naturalization of immigrants thereby stimulating and enabling their integration into a society. However, often actual experiences are different. They show that states (that declare themselves civic-liberal states and claim that ethnicity, culture and religion should be treated as purely private sphere of every individual without any impact on their private life are not ethnically and culturally neutral) as well as their citizens belonging to titular nations do pay attention to these individual characteristics and consider them in making concrete policies and decisions. Experiences of France (that in Europe is considered a typical (model) case of civic-liberal state that applies a civic-liberal model of integration) and especially riots there in 2005 (that could be described as ethnic riots of immigrants and their offspring born in France) confirm such conclusions. Hence, it should not be surprising that in addition to requests for the improvement of their social and economic conditions the rioters demanded adequate integration programs and measures that would improve their inclusion into French society. Additionally, reports about problems in integration of immigrants in certain environments and contexts in traditional immigrant states that follow liberal-civic model of integration, such as the USA, indicate that these models and concepts might not be sufficient and adequate in providing full integration of immigrants and their children into host societies.

Communitarian models of integration recognize, respect and take into account the existence of diversity and distinct communities. Moreover, they consider respect, adequate treatment, organization and management of these diversities central needs and tasks of modern plural societies (See e. g., Taylor 1994).

Recognizing and respecting the existence, needs and rights of distinct communities and trying to ensure their (special, minority) protection advocates of these models often put communities and their rights before individuals and individual rights, which is also the main criticism of critics who point at the incompatibility of these models with concepts of (individualistic) liberal democracy (Nikolić 2006: 16). Among possible solutions that can contribute to a better diversity management communitarian models offer decentralization, devolution, autonomy, setting up of (administrative) borders, federalization, partition and dissolution of existing states, which might lead to establishment of new sovereign states (e. g., Walzer 1997: 174). Ideally, these solutions can be reached in a peaceful and democratic way. Considering the presented characteristics of these models they might not be the most appropriate tools to facilitate integration of immigrants. Although in the (former) communist countries (that could be described totalitarian societies) such models did show certain positive results in preserving and developing cultures and identities of the recognized distinct communities, states usually reject them because of their presented characteristics – especially possible consequences and outcomes in democratic settings.

Liberal pluralism models of integration are trying to combine and make synergy of positive elements of liberal-civic and communitarian models. Such integration combines and includes respect of human rights, including minority rights and recognition of separate ethnic identities, fighting prejudice and discrimination, enforcement of anti-discrimination laws, and some modification of institutions of dominant culture making them more accommodating to cultural differences. Concepts of national identity and integration should be tolerant and pluralist in their nature. Additionally, Kymlicka (1995: 176) points out that an important element of inclusion is adequate representation of geographic and non-territorial constituencies in the public sphere. Such a concept of integration, putting an important emphasis on minority rights, contains elements enabling an ethno-cultural group to participate in society on an equal basis, while retaining its separate ethnic identity. Nikolić (2006: 19) concludes that:

Successful integration requires the willingness of both the minority and the majority, a two-way approach. The majority needs to understand that successful integration of a minority is in the benefit of the society as a whole, as it enables better overall social and economic development. In parallel, it is important for the minority group to play a leading part in constructing its own path to empowerment.

Although such models of integration have been advocated by a number of scholars and do receive positive reactions in several environments, so far only a few elements of these models have been introduced and implemented in the practice in integration policies of Canada and Australia, some European states

and the EU that officially proclaimed principles and concepts of multiculturalism and/or interculturalism as the bases of their policies. In this context, there are attempts to develop comprehensive integration policies that address especially target populations of immigrants and marginalized communities and try to include all relevant spheres of life. From the perspective of this approach it is important to start with activities and programs for the integration of immigrants immediately upon their arrival into the host societies or possibly even before their departure from societies of their origin. Policies and measures for the integration of immigrants (as well as persons belonging to marginalized distinct communities) should be designed to stimulate their interest for voluntary integration in a way that ensures the preservation and development of their specific cultures and identities if they express their interest and will to preserve and develop them. However, at this point in time liberal pluralism models and approaches should be considered to a large extent theoretical models and concepts.

It could be said that my theoretical models of integration and integration policies presented above and in appendixes could be classified among liberal pluralism models. However, differently than other models that give priority to individual dimensions and individual minority rights, my models require the equal respect of collective dimensions and rights. Consequently I would describe this model of integration as the *universal model of integration* that might be (considering the importance that I give to the collective dimensions of integration) considered also a specific, fourth type of integration. My understanding is that considering their nature minority rights should be defined as dual – simultaneously they are individual rights belonging to persons belonging to (national/ethnic and/or other) minorities and collective rights of minorities as collective entities. My model of integration could be described as an all-inclusive model that addresses and includes individually persons belonging to ethnic and other minorities, immigrants and marginalized individuals as well as collectively ethnic and other minorities, but also all other distinct communities. Such integration and integration policies should be based on the principles of respect of human rights, equality and non-discrimination, tolerance, solidarity and social justice, democratic inclusion and participation, and rule of law (Bešter 2006: 71). To be successful they demand active role of a state and its relevant institutions, but also of all other relevant factors, including immigrants.²⁷

The main goal of integration policies that are key components of successful diversity management in plural societies should be ensuring equality, equal possibilities, participation and inclusion of immigrants, persons belonging to national



²⁷ Relevant actors, factors and the institutional framework of integration and integration policies are presented in schemes in Appendixes 3 and 4.

and other minorities, marginalized individuals, minorities and other distinct communities in all spheres of social, economic and political life in a way that would enable preservation and development of their culture and identity. Consequently measures, programs and activities should be developed and carried out that should on the one hand prevent social exclusion, negative stereotypes, discrimination, racism and xenophobia and similar negative phenomena, and on the other hand stimulate and promote tolerance and equal cooperation, intercultural education and better knowledge of existing diversities, economic and social development, etc. Integration measures, programs and activities for immigrants should include assistance immediately upon their arrival, training and teaching of official languages and other languages of environment, providing information relevant for immigrants, providing training and educational programs that can assist their integration and promote their belonging to receiving society (Bešter 2006: 73–74). Taking into account that conflicts are normal phenomena in every plural environment successful diversity management and integration policies demand establishment and development of functional mechanisms and institutions for prevention, management and resolution of crises and conflicts.²⁸

INTEGRATION OF IMMIGRANTS AND THE POSSIBLE ROLE OF CITIZENSHIP OF STATES AND THE EU CITIZENSHIP

This section discusses integration of immigrants and immigrant communities as specific segments of integration and integration policies considering that immigrants and immigrant communities are specific and ever more important sub-populations of the whole target population of integration policies and measures. Although immigrants are just a segment of the total target population, we could conclude that the social importance/relevance of their successful integration continues to increase due to the increased mobility, intensified international migration and – especially in the cases of developed countries – also due to demographic trends (the ageing population). Namely, already now but especially in the long term developed societies are becoming ever more dependent on the constant inflow of immigrants needed to sustain their economies, social arrangements (especially social and pension systems) and current standard of living and should therefore address the issue of their integration seriously to provide for a stable social situation and development.

Discussing these issues we should be aware of the broader context. Integration of immigrants and respective policies are just segments of integration and inte-



²⁸ Fields and issues that are important for integration and should be included in integration policies are presented in Appendix 5.

gration policies that, however, simultaneously are intertwined not only with other segments of integration and integration policies but also are segments of a general policy and several other segmental policies, especially (im)migration policies that should address relevant issues of the regulation and management of migration. Consequently, the concepts and strategies of integration and integration policies should be developed simultaneously with migration (and especially immigration) policies and should be their important constituent parts as well as adequate parts of (im)migration policies should be integrated into integration policies. Such holistic and integrative approach should enable adequate regulation and management of migration flows, immigration and integration as well as the appropriate elaboration, permanent development and implementation of the regulation and policies regarding (im)migration and integration.

Although discussions on integration of immigrants and immigrant communities usually focus on international migrations and on integration of immigrants coming from abroad, we should stress that migrations and diverse migration flows are also permanent processes and frequent normal phenomena within every country that can be described as internal daily, temporary and permanent migrations. In several cases internal migrants can experience diverse problems in their integration into new environments, which also should be recognized and addressed adequately by integration policies and strategies in individual states. Among their possible problems we could list: diverse problems in arranging and regulating their new permanent or temporary residence; isolation, exclusion and/or discrimination that they might experience in a new environment; problems in social, political as well as cultural integration in their new environments that might be substantially different from the environments of their origin, etc.

On the other hand, as already mentioned, acquiring citizenship might be very important for the full integration of immigrants in the context of international migrations. As other authors, Bauböck (e. g., 1994, 2004) stresses the importance of full legal and political integration of immigrants. He points out problems encountered by countries that focused on economic and social integration of immigrants, but ignored their legal and political integration. A specific obstacle to integration of (international) immigrants are the existing legal regulations, policies and practices that make their access to citizenship by naturalization very difficult and limited or even impossible (which might be true not only for the immigrants who just came to a country, but also for their children who were born there). Consequently, Bauböck calls for the full political and legal integration of immigrants that includes their naturalization, but warns that the act of naturalization itself and acquiring of citizenship alone do not guarantee full legal and political integration of an immigrant. Full integration demands coherent policies and measures in all relevant fields of daily life as well as adequate participation

of all relevant actors, including immigrants and their associations, organizations and institutions.

As Bauböck, I consider acquiring the citizenship of the state of residence an important step in the full (individual) integration of an international immigrant into the host society. However, the acquisition of the citizenship of the state of residence should be considered just a step, a phase in the continuous process of integration of immigrants that, again, is just a segment of the process of (social) integration. Ideally, successful integration in diverse contemporary society should include all individuals and (distinct) communities, but should pay especial attention to marginalized ones. Consequently, integration policies and their measures should encompass the inclusion and voluntary integration of the second and the following generations of immigrants - including their children who were born in these countries and do possess citizenship of a respective country. Especially important in this context are the anti-discrimination measures and policies that should address and, hopefully, prevent all cases of direct and/or indirect discrimination that immigrants and their descendents might be exposed to. However, considering the actual social situation and status of immigrants and immigrant communities, antidiscrimination policies and measures might not be enough. At least in some cases additional policies of inclusion and diverse measures and actions that we could describe *affirmative action* might be required to ensure their equal rights, equality and full integration of immigrants and their children (the second and further generations of immigrants).

Usually it is believed that the process of integration of immigrants should start immediately upon their arrival into their host societies. My view is that, ideally, in the context of successful regulation and management of international migrations the process of integration migrants into new host societies should start already before they decide to emigrate. In societies of their origin the future emigrants should be provided with adequate information regarding their migration and their integration into new host societies. They should be presented not only relevant information about their future work and economic conditions, which for economic migrants might be the most important reasons for emigration, but also accurate information on their travel, immigration and customs procedures, arranging their legal status and accommodation, living and social conditions in new environments as well as on their integration into host societies. This information should include also relevant information on conditions and possibilities for (re)unification with their (immediate) families and for the integration of their family members into new host societies. Although calls for such an approach to and for such a concept of the regulation and management of migrations could still be considered a wishful thinking at present, they reflect finding of my research and especially interviews with immigrants and potential emigrants, especially in Slovenia and in countries of South Eastern Europe. Such views were expressed

especially by better educated and skilled immigrants and potential emigrants, who usually pay more attention to their integration into host societies than those migrants with less skills and education, whose main interests are frequently their expected wages as the source of remittances and support of their families.

Programs and activities supporting the integration of immigrants and their communities into their new host societies should address all spheres of life adequately. Their participation in such integration processes, programs and activities should be voluntary and arranged in such a way that they are treated as relevant and equal actors, whose active participation is welcomed and stimulated. The process of integration should start immediately upon their arrival with diverse targeted programs and activities such as providing the relevant information on their host societies, on the environment where they are settling, on specific circumstances in their new local communities and/or regions, on relevant immigration and customs regulations and procedures, on their accommodation and arrangement of their legal status (e. g. alien residents or refugees/asylum seekers), on the possibilities and regulations regarding employment, etc. As mentioned, ideally in cooperation between emigrant and immigrant countries, the future emigrants should be provided adequate information and be included in at least some integration programs, activities and processes already before their actual departure for the societies of their origin. Immediately upon their arrival into host societies receiving countries should do their best to include immigrants (when possible also members of their families) in special education and training programs and processes designed for immigrants as well as into universal educational systems and programs that should promote and practice integration. What is very important is that immigrants receive all relevant information in a way and language that are accessible to them. Immigrants should be included also in diverse civic and social activities and programs at all levels that can contribute to their inclusion. They should be invited and stimulated to become active members of associations and NGOs. Whenever possible, immigrants should be invited to participate in diverse processes and spheres of life, including social and political life at all levels – but especially in local communities. To a large extent with diverse measures and activities their integration as well as economic, social and political participation can be stimulated and achieved regardless of their citizenship, while the concept of *active democratic citizenship* might enable at least at the local level also direct political participation of persons who do not possess citizenship of the state where they reside. In this context I would advocate the introduction of the legislation on local government that would introduce and ensure the formal introduction of the right of non-citizens to vote and run in local elections. However, as long as there are certain rights, freedoms, services, posts and political offices that are reserved exclusively for citizens, we could expect the interest of immigrants to acquire citizenship of states where they live by naturalization. Consequently,

there will also be a need that states adequately formulate, regulate and realize their citizenship policies, immigration and integration policies and processes of naturalization. From this perspective, citizenship remains an important tool and requirement for full (especially legal and political) integration of an individual into a new society.

From that perspective, if a person holding a citizenship of an EU member state migrates within the EU and settles in a territory of other EU member state, the EU citizenship might become an important and convenient means for integration of such an immigrant in a country of immigration. Currently the EU is still based on the Treaty of Nice and the future of the Lisbon Treaty is still uncertain. The Consolidated Version of the Treaty Establishing the European Community establishes the EU citizenship that is dependent on the citizenship of the EU member states as the complementary concepts (Article 17). This treaty establishes the right of every EU citizen “to move and reside freely within the territory of the Member States, subject to the limitations and conditions laid down in this Treaty and by the measures adopted to give it effect” (Art. 18), “to vote and to stand as a candidate at municipal elections in the Member State in which he resides, under the same conditions as nationals of that State” even if he/she are not citizens of this state (Art. 19), to enjoy diplomatic protection of other EU Member States in the territory of the third state if his/her state is not represented there (Art. 20), “to petition the European Parliament” and to apply to (European) Ombudsman (Art. 21).²⁹ Consequently, the EU citizenship – regardless of its limitations – already at this stage establishes an important basis for the participation of European citizens in political processes at the EU level (enabling their participation in the election for the EU parliament) and at the local level. More precisely, the EU citizenship enables European citizens who reside in the territory of the EU member state of which citizenship they do not possess to integrate by participating equally with its citizens in local (municipal) elections and at the EU level.

For these reasons immigrants from the non-EU countries might be very interested in acquiring the EU citizenship. If and when an immigrant from a non-EU country acquires the citizenship of a certain EU member state by naturalization, he or she automatically acquires also the citizenship of the EU and becomes an EU citizen. This citizenship then entitles and enables an immigrant to move and reside freely within the territory of all member states – in other words, in the whole territory of the EU. However, the right of every EU citizen “to move and reside freely within the territory of the Member States” is especially in the case of new EU member states still “subject to the limitations and conditions laid down in this Treaty and by the measures adopted to give it effect”, which means



²⁹ See Appendix I.

that this right guaranteed by the Article 18 of the Consolidated Version of the Treaty Establishing the European Community might be limited for the transitory period(s) determined by accession treaties. Other rights of the EU citizens presented above might be even more important for the integration into the new host society of immigrants from third countries, who after acquiring the citizenship of a certain EU member state emigrate to another EU member state. We could expect that immigrants from non-EU member states would be more likely to migrate to those EU member states where (because of a more favorable procedure or other reasons) they are more likely to acquire their citizenship by naturalization, even in the case when their ultimate goal is to emigrate to another EU member states where they are less likely to get their citizenship in the same time. So far we do not possess the data to support such expectations and hypotheses regarding legal emigrants surely. However, it is known that especially illegal emigrants are more likely to go to those countries that they could enter easily, where it is less likely that they would be deported and/or acquire legal status that in the future might enable also naturalization. Sometimes these criteria are even more important for emigrants than the basic economic criteria, such as the higher income and/or higher standard of living.

Although it is almost impossible to predict precisely the future development of the EU and EU citizenship, we can assume that the process of integration will continue and deepen, while the EU citizenship in its nature and content will more and more resemble citizenship of sovereign states. Consequently, we might expect that the interest of immigrants from non-EU countries to acquire the EU citizenship will increase as well – especially when the migration within the EU will actually be considered truly internal migration rather than a (specific type) of international migration.

However, already at this stage the EU citizenship can be considered an important tool for the integration of immigrants who possess it and live in EU member states of which citizenship they do not have. The EU citizenship might prove useful also for “re-integration” of the former emigrants from individual EU member states who now possess citizenship of non-EU states. Namely, in their legislation on citizenship (nationality) several states – including some EU member states – provide for a special, faster and easier naturalization of emigrants who once possessed the citizenship of a respective state as well as for their descendents. Often they can apply for the citizenship (of the state of their origin) and (re)acquire it without the usual requirements to give up their other citizenship and/or to live in a country for a certain period of time. Originally, such measures and procedures of (re)naturalization were introduced by nation-states to stimulate possible reintegration of emigrants if they decide to return to the country of their origin and to make their reintegration easier. However, in the context of the EU these provisions on reintegration mean that with the citizenship of the country of their

origin, which is an EU member state, they acquire also the citizenship of the EU, which then gives them all the rights presented above. Consequently, as the EU citizens they can move freely within the EU and settle and employ in any other member state, which is the country of their choice (of course with certain limitations for citizens of the “new” member states in transitory period).

This phenomenon has not been studied yet. However, we know of some cases when emigrants from certain EU member states who emigrated to different parts of the world did (re)acquire citizenship of their countries of origin, thereby acquiring also the EU citizenship which enabled them to migrate to another EU member states. For example, some immigrants from Italy and their descendents, who were Argentinean citizens in the time of a severe economic crisis there decided to (re)acquire Italian citizenship by naturalization according to special provisions for the reintegration of Italian emigrants. When they (re)acquired Italian citizenship and became the EU citizens they found employment and settled especially in the UK and countries of Benelux. Such “re-emigration” and “reintegration” is even simpler for those emigrants from the EU member states who have not renounced citizenship of states of their origin when they acquired the citizenship of their new country of immigration.

In this context we can cite the famous Micheletti case, which is a case of a dual citizen of Italy and Argentina, who had lived in Argentina before he came to Spain where he wanted to settle. Although he possessed Italian citizenship which entitled him to the “European citizenship”, Spain decided to treat him as an Argentinean citizen due to the fact that he came there from Argentina. The case was brought before the Court of Justice of the European Communities that ruled:

Whenever a Member State, having due regard to Community law, has granted its nationality to a person, another Member State may not, by imposing an additional condition for its recognition, restrict the effect of the grant of the nationality with a view to the exercise of a fundamental freedom provided for in the Treaty, particularly since the consequence of allowing such a possibility would be that the class of persons to whom the Community rules on freedom of establishment were applied might vary from one Member State to another (The Court of Justice of the European Communities, Case C-369/90, Mario Vicente Micheletti and others v. Delegación del Gobierno en Cantabria, 1992).

This decision established an important precedence: when an individual does have citizenship of any EU member state and, thereby, the EU citizenship, other member states could not ignore or reject this status. This decision confirms the sovereign and arbitrary right and power of every state to decide upon granting its citizenship to an individual in accordance with its legislation. Simultaneously

this decision to a certain level reduces sovereignty of the EU member states by setting the principle that other member states have to recognize and respect the EU citizenship of an individual acquired on the basis of citizenship of one EU member state. Consequently, the status of a EU citizen does guarantee an individual possessing it equal treatment and adequate judicial protection at the EU level regarding the rights to “to move and reside freely within the territory of the Member States” and the freedom of establishment.

Exploring the role of citizenship of individual sovereign states and of the EU citizenship in the integration process this section addresses the individual dimension of integration and focuses on the integration of immigrants. At the first glance the acquisition of citizenship of individual states (as predominantly legal status of an individual) does not affect the collective dimensions of integration of national and other minorities, immigrant communities, diverse communities and groups into the environments where they reside. The EU citizenship seems to have even less impact. However, citizenship of sovereign states and to a certain (limited) extent also the EU citizenship actually do have a certain impact on the status of individuals and might be very relevant for the integration of diverse distinct collective entities, in our case immigrant communities. Namely, if all or majority of members of a certain immigrant or any other distinct community do possess the citizenship of a respective state their claims for the adequate minority protection and/or for the official recognition of their specific legal minority status might be considered more substantiated. In time the immigrant communities that for a longer period of time, possibly for generations live in a certain environment more and more resemble traditional national minorities – although their settlement usually is no compact, but dispersed following specific migration flows and paths. Consequently – regardless of the reluctance of states, possibly sometimes in spite of their reluctance – immigrant communities and certain distinct groups can be expected to demand that the traditional minority protection and new developments in the human rights regulation, practice and minority protection be extended also to them. In this context they could use the argument that the relevant research and evidence confirm that the full and successful inclusion and integration into a certain diverse society demand that all spheres or life are adequately addressed. They also demand that the integration policies, measures and activities should include and pursue both individual and collective dimensions of integration, which in the case of immigrants (in addition to their first generation also their descendents in the second and the following generations) and immigrant communities demands their permanent active involvement and participation.

CONCLUSION

This article examines citizenship, integration, their interconnections and interplay. In addition to traditional concepts and models of citizenship it presents the concept of *active democratic citizenship* that especially in local communities should stimulate full voluntary inclusion and active participation of all individuals (as well as distinct communities as relevant collective entities) who live in a certain environment – regardless of their citizenship, which means that it no longer builds upon the exclusivity of the citizenship of a respective sovereign state. In defining integration as a social process I point to its dual – individual and collective – nature and stress the importance of the adequate integration policies and practices for individual states that, still predominantly, might be defined as single nation states. In this context the article analyzes the role and importance of citizenship of individual sovereign states and of the EU citizenship for the full (economic, social, cultural and political) integration in general and, more specifically, for the integration of immigrants and immigrant communities in their host societies. We could expect that as long as nation states will continue to “reserve” certain rights and positions exclusively for their citizens there will be the interest of immigrants (actually all individuals who do not possess the citizenship of the country of their residence) to acquire citizenship of the state of their settlement by naturalization.

My study confirms the working hypothesis that acquiring the citizenship (of a new, host) country by naturalization might be a necessary (if not the key) (pre)condition for a full integration of an individual (usually an immigrant) into a society (host, immigrant society) where he or she lives. However, acquiring citizenship by naturalization should be considered just a step, although an important phase in the process of integration. Namely, new and alternative concepts – such as the *active democratic citizenship* – require constant reexamination and revisions of classic concepts as well as continuous development of additional new concepts. For example, the concept of *active democratic citizenship* and some proposals for the reforms of integration policies of states suggest that the (permanent and sometimes temporary) legal residence should be determined the legal basis for democratic (political) participation and for the full inclusion in public life.

In addition to studying citizenship of sovereign states this article examines also the EU citizenship and its importance for an individual who possesses such a status. Special attention is paid to its possible impacts and the importance of the EU citizenship for the integration of immigrants. Although the EU citizenship is a limited and predominantly political concept, it creates a specific legal basis for political participation of an individual who possesses it. The EU citizens who live in a member state (of which citizenship they do not possess) are entitled to participation in elections for the European Parliament and in municipal elections.

Although the acquisition of the citizenship of the state of residence by naturalization, which in the case that this state is an EU member state means also the acquisition of the EU citizenship, establishes individual's legal status and is symbolically a very important event, the acquisition of citizenship of a sovereign state and the EU does not guarantee full and successful integration to this individual. Moreover, from research and our experiences we know that a successful integration of an individual (in our case an immigrant) into the society where he or she lives might be possible to a large extent (in some cases almost fully) without the acquisition of the citizenship of the state of the legal temporary or permanent residence by naturalization. A formal possibility in certain countries that a person without the citizenship of the respective state who has the status of legal (alien) resident can participate also in some political processes, most frequently at the local level and in institutions of local government further decreases the importance of citizenship for the process of full voluntary integration. The success of the integration process is dependent upon the existence of a comprehensive integration policy, which should include adequate measures, programs and activities designed to assist integration of individuals as well as distinct communities.

However, I would like to stress that citizenship of sovereign states as well as the EU citizenship will continue to play a role in the full political and legal integration of individuals and will have an impact also on the integration of distinct communities as long as certain rights and benefits will remain reserved only for citizens. In this context special attention should be paid to the possible role of the EU citizenship as a specific tool and means for the easier settlement and employment in EU member states, of which citizenship an EU citizen does not possess. The EU citizenship might be important also for a specific "re-integration" of emigrants (and their descendents) who in the past emigrated from the EU member states. Namely, some (nation) states developed and introduced specific legislations, policies and practices of reintegration by special naturalization of emigrants (and their descendents) who originate from respective states (or can demonstrate certain ethnic roots). By (re)acquiring the citizenship of the respective state that is the EU member state by such special naturalization (that is usually quicker and simpler) and such citizens automatically acquire also the EU citizenship, which entitles them to move and settle freely (with certain limitations set forth in the EU and accession treaties) in the EU.

In conclusion, considering of the intertwined nature and interdependent contents of migration, integration and citizenship policies and legislation we could hope that relevant policy makers will try to address and develop them holistically - taking into account their influences and synergies as well as consequences. This could be especially important for developed societies that considering the current demographic trends, social and economic needs are more and more dependent on the constant inflow and integration of immigrants. Consequently,

their policy makers will need to revise current migration and integration policies in a way that will treat also the acquisition of the citizenship of the respective state and the EU citizenship as an element of the full voluntary integration of immigrants and immigrant communities.

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APPENDIX 1: THE PROVISIONS OF THE CONSOLIDATED VERSION OF THE TREATY ESTABLISHING THE EUROPEAN COMMUNITY (OFFICIAL JOURNAL OF THE EUROPEAN COMMUNITIES, C325/24.12.2002) THAT ESTABLISH THE LEGAL BASIS FOR THE EU CITIZENSHIP:

PART TWO

CITIZENSHIP OF THE UNION

ARTICLE 17

1. Citizenship of the Union is hereby established. Every person holding the nationality of a Member State shall be a citizen of the Union. Citizenship of the Union shall complement and not replace national citizenship.

2. Citizens of the Union shall enjoy the rights conferred by this Treaty and shall be subject to the duties imposed thereby.

ARTICLE 18

1. Every citizen of the Union shall have the right to move and reside freely within the territory of the Member States, subject to the limitations and conditions laid down in this Treaty and by the measures adopted to give it effect.

If action by the Community should prove necessary to attain this objective and this Treaty has not provided the necessary powers, the Council may adopt provisions with a view to facilitating the exercise of the rights referred to in paragraph 1. The Council shall act in accordance with the procedure referred to in Article 251.

3. Paragraph 2 shall not apply to provisions on passports, identity cards, residence permits or any other such document or to provisions on social security or social protection.

ARTICLE 19

1. Every citizen of the Union residing in a Member State of which he is not a national shall have the right to vote and to stand as a candidate at municipal elections in the Member State in which he resides, under the same conditions as nationals of that State. This right shall be exercised subject to detailed arrangements adopted by the Council, acting unanimously on a proposal from the Commission and after consulting the European Parliament; these arrangements may provide for derogations where warranted by problems specific to a Member State.

2. Without prejudice to Article 190(4) and to the provisions adopted for its implementation, every citizen of the Union residing in a Member State of which he is not a national shall have the right to vote and to stand as a candidate in elections to the European Parliament in the Member State in which he resides, under the same conditions as nationals of that State. This right shall be exercised subject to detailed arrangements adopted by the Council, acting unanimously on a proposal from the Commission and after consulting the European Parliament; these arrangements may provide for derogations where warranted by problems specific to a Member State.

ARTICLE 20

Every citizen of the Union shall, in the territory of a third country in which the Member State of which he is a national is not represented, be entitled to protection by the diplomatic or consular authorities of any Member State, on the same conditions as the nationals of that State. Member States shall establish the necessary rules among themselves and start the international negotiations required to secure this protection.

ARTICLE 21

Every citizen of the Union shall have the right to petition the European Parliament in accordance with Article 194.

Every citizen of the Union may apply to the Ombudsman established in accordance with

ARTICLE 195

Every citizen of the Union may write to any of the institutions or bodies referred to in this Article or in Article 7 in one of the languages mentioned in Article 314 and have an answer in the same language.

ARTICLE 22

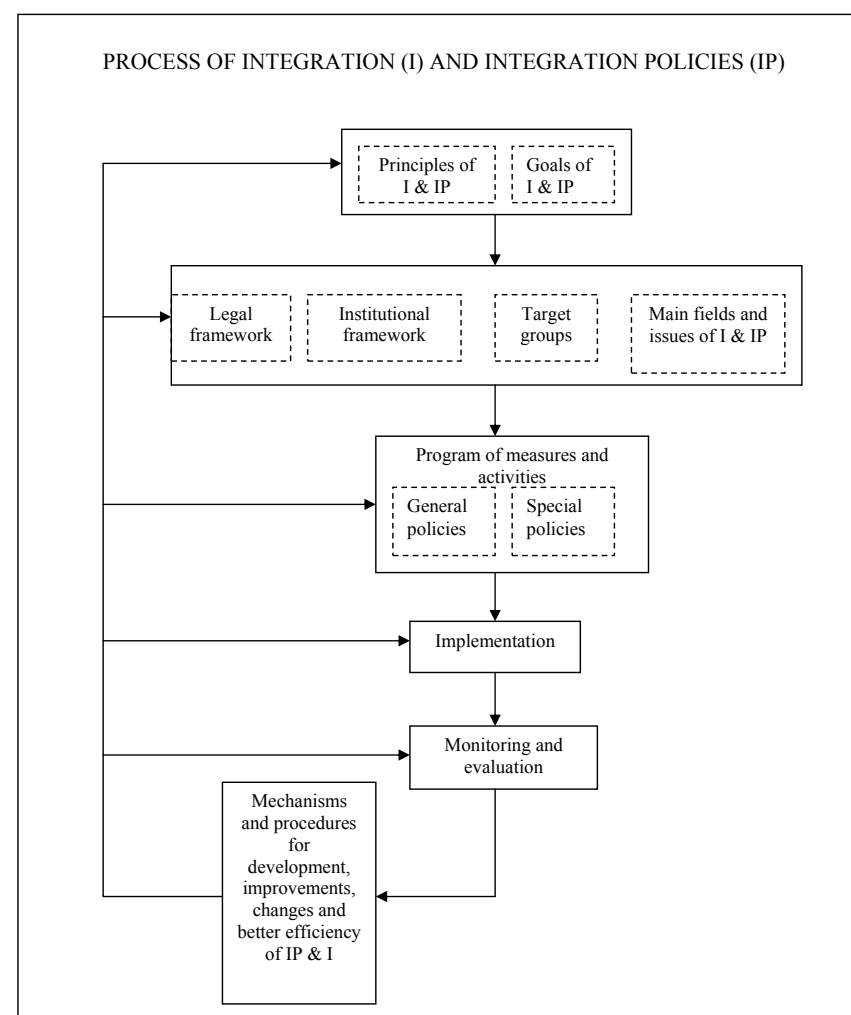
The Commission shall report to the European Parliament, to the Council and to the Economic and Social Committee every three years on the application of the provisions of this part. This report shall take account of the development of the Union.

On this basis, and without prejudice to the other provisions of this Treaty, the Council, acting unanimously on a proposal from the Commission and after con-

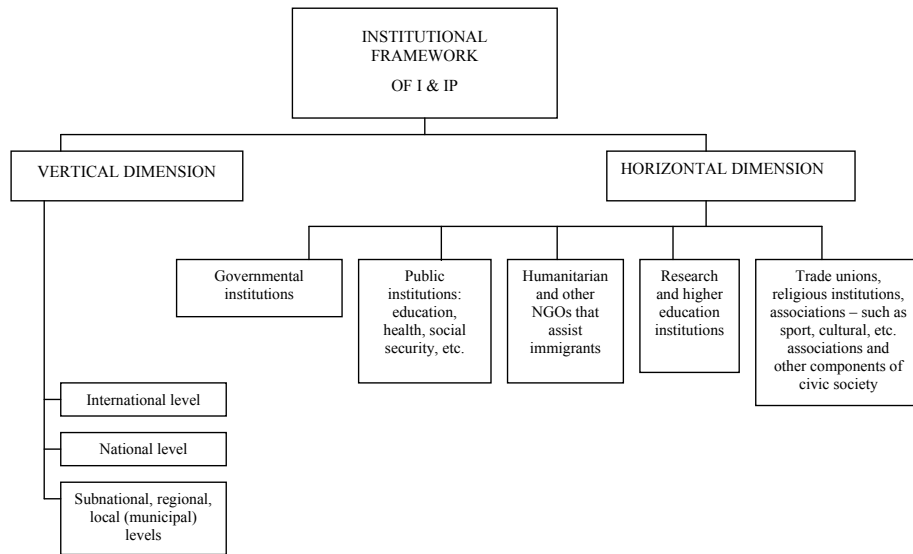
sulting the European Parliament, may adopt provisions to strengthen or to add to the rights laid down in this part, which it shall recommend to the Member States for adoption in accordance with their respective constitutional requirements.

APPENDIX 2: BASIC SCHEME: PROCESS OF INTEGRATION AND THE MODEL OF INTEGRATION POLICY

(based upon: Bešter 2006: 70)

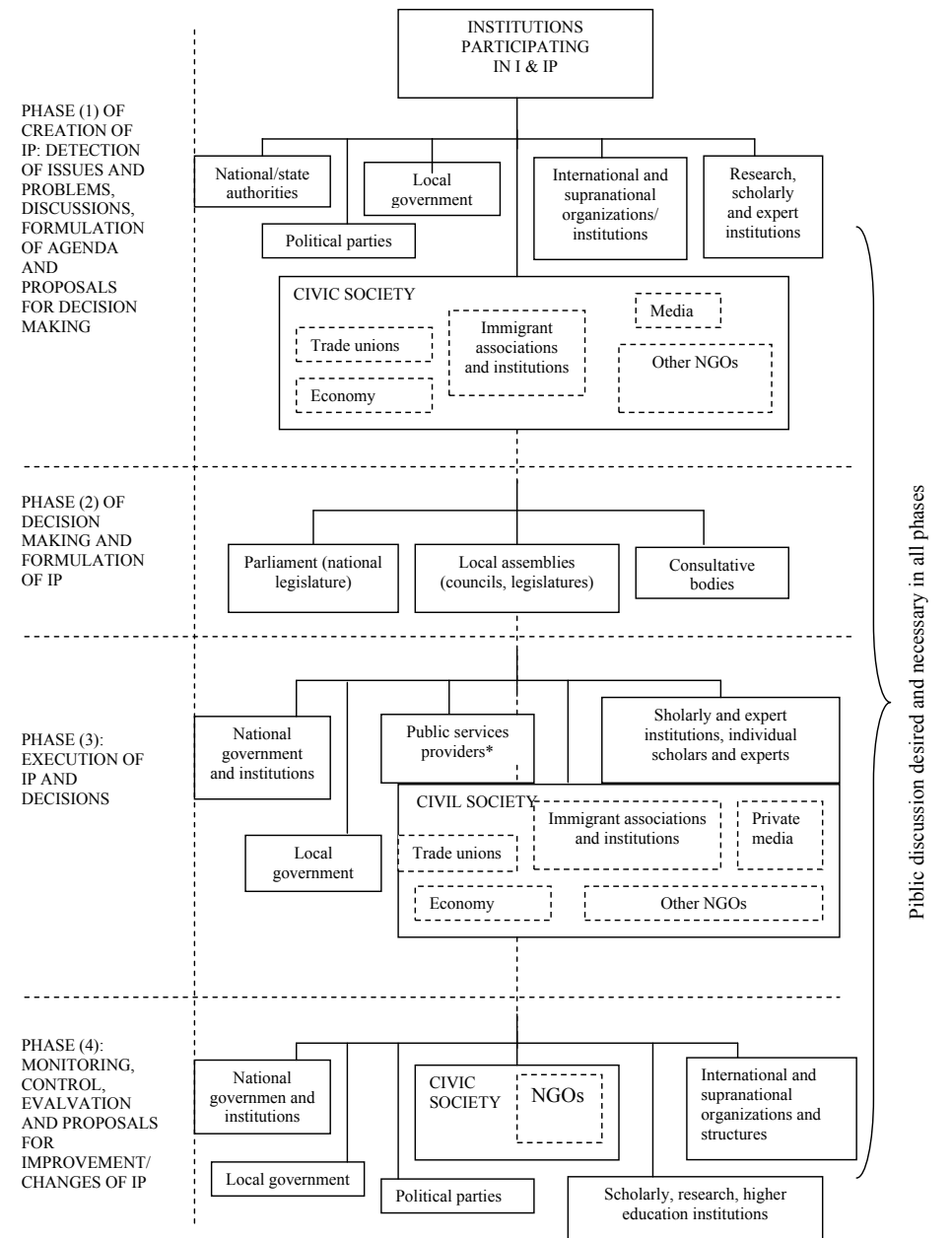


APPENDIX 3: SCHEME: INSTITUTIONAL FRAMEWORK OF INTEGRATION (I) AND INTEGRATION POLICIES (IP) (BEŠTER 2006: 78)



APPENDIX 4: SCHEME: ROLES OF INSTITUTIONS AND OTHER ACTORS IN THE PROCESS OF INTEGRATION (I) AND INTEGRATION POLICIES (IP)

(based upon: Bešter 2006: 81)



* Education, child care, health care and security, social security and services, public media, etc.

APPENDIX 5: SCHEME: MAIN FIELDS AND ISSUES OF INTEGRATION AND
INTEGRATION POLICIES

(based upon: Bešter 2006: 87)

