



European Network Against Racism  
Réseau européen contre le racisme  
Europäisches Netz gegen Rassismus

# A Deconstruction of the Second European Agenda for Integration

Comments of the European Network Against Racism on the  
Communication: European Agenda for the Integration of Third  
Country Nationals

**November 2011**

Contact: Shannon Pfohman, Deputy Director - Policy  
[shannon@enar-eu.org](mailto:shannon@enar-eu.org)

The European Network against Racism (ENAR) is a network of some 700 NGOs working to combat racism in all EU Member States. ENAR is determined to fight racism, racial discrimination, xenophobia and related intolerance, to promote equality of treatment between EU citizens and third country nationals, and to link local/regional/national and European initiatives.

European Network Against Racism aisbl - ID number 09854512780-89  
60, rue Gallait, B-1030 Brussels  
Tel: +32 2 229 35 70 - Fax: +32 2 229 35 75  
Visit ENAR's website: [www.enar-eu.org](http://www.enar-eu.org)

## Executive Summary

The following is ENAR's policy response to the European Commission's Communication: European Agenda for the Integration of Third Country Nationals that was released in July 2011. While ENAR praises the Commission for its attempts to promote integration strategies throughout Europe by making recommendations on strategies to be implemented at the national level, ENAR is critical of a number of aspects recommended in the Second European Agenda for Integration, a brief outline of which is listed below, followed by a more detailed explanation in the subsequent section.

- ENAR encourages the European Commission to be more conscious of the language it uses in references made about TCNs and related policies impacting their lives, as the tendency is to speak of them in economic terms or as something to be "tolerated". Third Country Nationals are first and foremost *humans* who contribute immensely to European societies in more ways than just in terms of financial advantages.
- ENAR encourages a move away from the mainly economic focus attributed to TCNs. Integration is inextricably linked with anti-discrimination and social inclusion, which is why clear policies and guidelines for the protection of all migrants in the Member States must be prioritized. Positive formulation needs to be emitted that reinforces integration as a two-way process, meaning that both migrants as well as the receiving society incorporate policies and behaviours that promote integration.
- ENAR also encourages that the European Commission stop focussing primarily on the "challenges" related to TCNs when speaking of integration. ENAR urges that governments stop seeing integration as a problem and finally recognise migrants' contributions to European society. More examples of the positive contributions TCNs make to society need to be reflected in EC policies and communications to reinforce the advantages of integration and highlight that both migrants as well as the receiving society are involved.
- Moreover, ENAR encourages that knowledge of the receiving society language be emphasised as an opportunity for participating in civil life with all members of society. Receiving society language proficiency should not be viewed only in economic terms, as the means by which to access the labour market, as this is inaccurate. For decades migrants have been working throughout Europe despite a lack of pre-existing receiving society language proficiency and have managed over time to learn the language. Thus, language courses should not be forced upon migrants and tested as an entry requirement to a certain country.
- ENAR, furthermore, encourages that the European Commission reconsider involving countries of origin in national integration strategies for TCNs, as this not only restricts their freedom of movement but also implies paradoxical approaches, encouraging integration on the one hand, while restricting entry and access on the other hand. This proposal implies that the EU and its Member States are more concerned with controlling migration flows than truly promoting the integration of migrants in Europe.
- In consideration of future ways forward, ENAR encourages that policies be more transparent, incorporating integration as a two-way process, and prioritizing the protection of all migrants in the Member States. ENAR encourages that European, national, and local integration strategies are developed and implemented in genuine partnership with NGOs and migrants themselves. Furthermore, ENAR calls on EU Member States to resolve the specific barriers and structural discrimination that result in inhibiting migrants in their integration process. Two-way processes of integration need to enable TCNs to enter the territory, access the resources and services, and participate fully in society.

## Introduction

As a network concerned with the rights of all ethnic minority communities in the European Union, the European Network Against Racism (ENAR) has closely followed the emergence and development of the EU's common agenda on integration. Following the release in July 2011 of the European Commission's Communication on the European Agenda for the Integration of Third Country Nationals, as requested in the Stockholm Programme, ENAR welcomes the opportunity to respond to this Communication and hopes to contribute further in shaping and influencing the ways in which the European Union approaches European integration policy and related strategies.

ENAR understands the aim of this Communication is to assist and encourage EU Member States to carry out, with Third Country Nationals as the focus group, effective integration strategies. ENAR is pleased that the European Commission is active in the promotion of much needed solutions for implementing European integration strategies. ENAR also appreciates seeing that some of the priority areas we have previously put forth in our past policy responses on European integration strategies have been adopted in the Communication on the European Agenda for the Integration of Third Country Nationals (henceforth TCNs).

For instance, we embrace the European Commission's goal to "share responsibilities" in developing and implementing effective and coherent policy making across policy sectors and at both national and local levels. We also applaud any endeavours that seek to monitor progress in this realm and that aim to promote and acknowledge the potential of migration. Furthermore, we welcome the focus on the active participation of migrants in all areas of collective life, and appreciate efforts to promote host society language proficiency and to foster the labour market participation of TCNs as well.

Yet in this regard, we feel the emphasis in this Communication is too heavily placed on the economic dimensions of migrant integration. The European Commission and Member States need to recognize that receiving society language proficiency is important for TCNs but not just for accessing the labour market, rather for fully participating and interacting with all members of society.

ENAR also feels that the integration approach described in this Communication continues to place the burden of responsibility on the TCNs, rather than on the national governments. We are not yet convinced of the "full commitment of the receiving society". We also believe that a need for high level political commitment to the integration processes at all levels of decision making must transpire.

Clearly, the focus of this Communication is on strategies to improve and advance the integration of Third Country Nationals within Europe. Considering the multitude of examples described, however, in which less than inclusive and welcoming formulations are used in regard to TCNs, much work is still needed for the creation of a true European public space. ENAR believes this must start with a Communication on European Integration that embraces a political will with the use of language that is also inclusive, democratic, and mindful of the need to respect the fundamental rights of all, not just a small few.

As such, ENAR questions the language used in this Communication in particular and in regard to the integration of TCNs in general, as integration is often described and perceived in Europe and in this Communication as a “challenge”.

### Increased consciousness is needed by the European Commission regarding the language used in references to and policies on integration of TCNs

With the aim of influencing Integration Agendas in the EU Member States, this Communication is very important and will be reviewed by many governments, civil society members, and other relevant stakeholders involved in the implementation and monitoring of national integration strategies. As such, the politics and the language used by the European Commission in references made about the integration of Third Country Nationals (TCNs) also have an impact at the national and local levels. Numerous examples of inopportune wording and phrasing abound in this Integration Agenda Communication, which in the opinion of ENAR evoke negative images of TCNs. ENAR thus ask the Commission to be conscious of the language it uses by reconsidering a number of formulations in the Communication.

For example, the wording used in the following quote, taken out of the Communication, evokes **the idea of the Third Country National having failed their duties and responsibilities** to integrate.

“All EU actions presented by the Commission in the 2005 Common Agenda for Integration have been completed. However, the social, economic and political context has changed. And not all integration measures have been successful in meeting their objectives. Integration policies also require the will and commitment of migrants to be part the society that receives them”. (p.2)

Whether the authors of this Communication intentionally remind readers of the duties of the TCNs to integrate - after admitting that not all of the integration measures have been successfully met - is unclear. Regardless, ENAR finds this transition rather problematic, as it implies that TCNs are the reason why the integration measures have not been successfully met, particularly since in the sentence before it affirms that all the EU actions have been completed.

Recalling that the readership audience targeted in this communication are the Member States, this language seems to excuse the governments from lack of follow-through on integration reform and instead focuses attention on the duties and requirements of Third Country Nationals to perform in accordance to the given integration indicators, i.e. to learn the host society language, work, become financially independent, pursue an education, contribute to society, etc. Perhaps, **an analysis or statement as to why the objectives were not met would provide clarity and be less misleading.**

Another problematic language formulation is evident in the following example. The box in the left is taken from the EC Communication while the box on the right is ENAR’s suggested reformulation.

As quoted from the EC Communication	ENAR proposes
<p>“Demographic trends vary from region to region and need to be addressed through tailor made solutions. If the full benefits from migration are to be realised Europe needs to find a way to better cope with its diverse and multicultural societies through more effective integration of migrants”. (p.2)</p>	<p>“Demographic trends vary from region to region and need to be addressed through tailor made solutions. If the full benefits from migration are to be realised Europe needs to find a way to better cope with its diverse and multicultural societies <b>and to devise more effective policies that foster the</b> integration of migrants”.</p>

ENAR’s proposed reformulation amends the negative messages emitted through the EC formulation by removing the burden of integration away from the TCNs and balancing it with the duties of the Member States to devise integration policies that foster integration. **Integration must be recognised as a welcome and necessary development in Europe**, particularly as Europe continues to face demographic and economic pressures. ENAR stresses the fact that a holistic approach to integration is needed that considers the many benefits and values associated with migration. For this, the benefits and value of diversity must be promoted and ensured. In this regard, it is also important to acknowledge that Europe has long been diverse and will continue to be long into the future.

Another language-related issue, very similar to the above example, is evident in the following formulation:

As quoted from the EC Communication	ENAR proposes
<p>“Integration is an ever evolving process, which requires close monitoring, constant efforts, innovative approaches and bold ideas. The solutions are not easy to define but if migrants integrate successfully in the EU, this will represent a significant contribution to the achievement by the EU of the targets it has set in the Europe 2020 Strategy, namely to raise the employment rate to 75% by 2020, to reduce school dropout rates to less than 10%, to increase the share of the population having completed tertiary education and to lift 20 million people out of poverty or social exclusion”. (p. 4)</p>	<p>“Integration is an ever evolving process, <b>the promotion of</b> which requires close monitoring, constant efforts, innovative approaches and bold ideas. The solutions <b>to revamp existing integration responses</b> are not easy but if <b>Member States foster the integration of</b> migrants in the EU, this will <b>make a</b> significant contribution to the achievement by the EU of the targets it has set in the Europe 2020 Strategy, namely to raise the employment rate to 75% by 2020, to reduce school dropout rates to less than 10%, to increase the share of the population having completed tertiary education and to lift 20 million people out of poverty or social exclusion”.</p>

**ENAR encourages that emphasis be placed on monitoring efforts and approaches to promote integration positively.** The EC Communication suggests that integration itself needs to be monitored, which has long implied that integration indicators be applied as measures of success among migrants in their integration processes. This approach, however, tends to discount

structural and emotional factors that hinder full participation, and oversimplifies a more complex situation.

By inserting the few words proposed by ENAR in the above excerpt, a very different message and positive formulation is emitted that reinforces integration as a two-way process, meaning that both migrants as well as the receiving society incorporate policies and behaviours that promote integration. It also emphasises that integration needs to be a shared responsibility, involving all actors and not just focussing on the Third Country Nationals or migrant population.

### Stop focusing primarily on the “challenges” related to TCNs and integration

By purposely aiming to “highlight European integration challenges” (p.3), the EC Communication is making a political statement, implying that integration and migration is problematic. Why would Member States promote fair and welcoming integration strategies for Third Country Nationals when the emphasis continues to be on the *challenges* and problems of integration? ENAR is strongly against this negative emphasis and instead maintains the position that migrants contribute socially, economically as well as culturally to European societies and need to be viewed in positive terms. The potential of migration must be more evident in such Communications.

Mentioning these “challenges” without having the necessary political will to resolve the obstacles at national and EU level signify a “fake two-way integration approach”. It is a mere showcasing of good intentions without the genuine political will to support them. ENAR thus calls on EU Member States to resolve the specific barriers to labour market inclusion faced by TCNs, such as lack of systems for the recognition of academic qualifications or vocational training, insecure residence status or lack of legal access to employment. This negatively affects TCNs, but in particular also beneficiaries of international protection. Structural changes must ensue not just to ensure the bottom up approach and to enable access to participation but also in order to realize the promises of “integration through participation”, “more action at local level” (p.4), and “strong commitment by the receiving society” (p.12).

In this matter, ENAR applauds the mention of beneficiaries of international protection in the consideration of EU, national, and local integration approaches of TCNs, particularly, since this group is often denied access to many essential resources that would make their integration invaluable, with striking differences in policies existent throughout the different EU Member States. ENAR also **believes the specific needs of undocumented TCNs must be taken into consideration** to build a sustainable and comprehensive integration policy that is respectful of fundamental rights and fosters democracy for all those residing within the EU. When humans are categorized and artificially divided for the sake of policy strategies, the human fundamental rights of only some are being considered, but not of all.

Overall, it is imperative that greater focus be placed on efforts to curb the disadvantages and segregation TCNs commonly experience, not just in urban areas, but also in rural regions, also where beneficiaries of international protection are purposely dispersed and where high levels of racism and hate violence often predominate. Integration is inextricably linked with anti-discrimination and social inclusion, which is why clear policies and guidelines for the protection of all migrants in the Member States must be prioritized for the legitimation of the EU’s claims to promote integration as a two-way process.

## Emphasise language proficiency as opportunity to participate with all members of society

By raising the point of the importance of language acquisition under the heading of “The socio-economic contribution of migrants”, the emphasis in this Communication is purely on the economic contribution of TCNs. It is vital to recognize that receiving society language proficiency is important for TCNs, but not just for accessing the labour market. By encouraging language only as an economic motivation, the message emitted is that TCNs only have the potential to contribute to society financially. But what about the significance of language learning for interacting with others in society? Learning the receiving society language is the key to communication, necessary to interact with others in society, make friends, visit neighbours, buy groceries, ask for directions, among many other examples. Language acquisition should be encouraged as it makes life easier for TNCs and enables their interaction with the receiving society.

ENAR thus proposes that this point on “acquiring language knowledge” still come under the heading of “Integration through participation”, but rather than the first focus being on the socio-economic contribution of migrants, it instead be on the category: “Active participation of migrants in all aspects of collective and life”. This preferred heading allows a positive interpretation of participation that focusses on possibilities for social interactions and intercultural dialogue between the TCNs and the receiving society. While positive reinforcement in language learning is needed, it must also be highlighted that dialogue enriches cultural exchanges and mutual understanding and is positive for civil participation, but it should not be the main argument for economic participation. We need merely acknowledge the economic contribution made by migrants throughout history despite their limited proficiency in host society language competency.

Here, it is also important to mention the added value for the receiving society of the TCNs’ native languages. Strategies should be devised to make better use of these skills. The language issue should most clearly be an example of the EU’s strategy to promote integration as a two-way process and not only be a one-sided task of the migrant, tested in the form of language tests for residence rights.

**While it is extremely important for TCNs to learn the language proficiently of the society in which they are living, this is not just a necessity for accessing the labour market.** This sort of economic focus has the potential of resulting in Member States exerting greater pressure on newcomers to learn the language while also fostering negative images of TCNs as “being lazy” or “unwilling to learn” the receiving society language. ENAR strongly opposes such negative portrayals and instead links language learning with psychological elements. Generally, the more attached people feel and the more they feel they belong in a society, the faster they tend to learn the language of that society. ENAR thus warns of the focus on legislation introducing language tests and introduction programmes that infringe more often on the right to family life and/or are discriminatory.

Policy and decision makers must therefore adopt a holistic and coherent approach to all relevant policy areas for effective integration solutions. Fostering intercultural dialogue and promoting language learning of migrants as well as of mainstream society is deemed a valuable benefit for social interactions that help curb against segregation and isolation.

### Move away from the mainly economic focus related to TCNs

In describing aims of the European Commission and current challenges pertaining to integration, the language used in this Communication reduces the TCNs and related integration strategies to mere economic dimensions. ENAR confirms that TCNs contribute to society more than just economically. Third Country Nationals compose ethnic and religious minorities who serve as bridges between societies. An approach framed by respecting human rights and recognizing the positive nature of diversity in Europe needs to prevail and be reflected through the promotion of positive values, conceptions, and principles. ENAR thus encourages a more balanced presentation of the potentials of TCNs to Member States and further recommends that the language used by the EC Commission in this Communication be revised to be more inclusive and less one-sided.

There is often mention of the need for “effective integration of legal migrants” but this is never clearly explained. The emphasis – based on this document – is clearly on labour market participation and economic contributions expected of newcomers to the EU. Yet effective integration should mean much more than just becoming yet another homo economicus.

In effort to counter this tendency, **ENAR encourages the understanding and promotion of social integration of all, and not just a focus on Third Country Nationals.** The EU should operate as an inclusive democracy taking into account all people who are living in its territory and not resist establishing an explicit definition and process for integration.

### Reconsider involving countries of origin

ENAR struggles with the emphasis placed on the countries of origin as key players in the integration of TCNs. Involving the country of origins in European integration processes results in restricting the free movement of humans. It further implies that integration for access to European countries must take place before a migrant even leaves his/her home country. ENAR cannot help but wonder if the involvement of the country of origin is going to have implications on the goal of integration to be a two-way process involving the commitment of the receiving society and the migrant itself, since now it becomes inexplicitly a three-way process.

In this regard, it is important to consider as well why people move to other countries. Some root causes of migration include the utter imbalance in international trade (in particular in agriculture with heavily supported EU agriculture ruining the local economies in countries of origin); speculation on primary economy products and agriculture; land speculations; as well as (Western) government support of dictatorships and warlords, often inspiring migration movements to Europe. What impact will pre-departure integration regulations have for these TCNs hoping to migrate to Europe? Is this not in contrast to the aim of fostering cohesive societies and inclusionary practices? We think yes, it is in contrast. We further insist that the EC be conscious of its role in inspiring migration movements to Europe and of its responsibility to apply the Charter of Fundamental Rights in all of its policy actions, including both internally and externally, including the area of trade.

Further to this, the irony of involving countries of origin in the pre-departure integration of TCNs results in placing greater pressure on the sending countries to control their populations. It also reinforces the permanency of the link between TCNs and their countries of origin. ENAR is therefore concerned about the impact of such an approach on the freedom of an individual to leave one's country of origin and to choose to never return and have no further link. What happens in so-called democratic countries in which human rights violations occur? What responsibility should the European Union have? We need to draw lessons from the particular situation of Libya with a leader like Gaddafi and the response of the EU to tighten entry restrictions as an example. ENAR thus questions to what extent the EU's focus on pre-departure integration might result in actually contributing to the human rights violation in the country of origin by preventing people from seeking protection from authoritarian governments? Has the EU made any sound Fundamental Rights impact analysis on this issue? ENAR therefore additionally emphasises that European migration and integration policies cannot be envisaged separately from all EU external policies.

ENAR fears that despite the EC's responsibility to ensure the guardianship of the letter *and* the spirit of the EU Treaties, including in particular the transversal respect of fundamental rights, conservative approaches at national level are now influencing the European Commission to respond by encouraging entry restrictions for certain types of migrants, ranking humans based on various legal statuses, requiring their successful integration before even having left their home country, enforcing language and culture tests as a way of holding them accountable, limiting family rights with harsher policies and in some cases, even imposing rigorous interviews and controls to determine if they are "truly" deserving of international humanitarian protection.

As such, it seems that national-level concerns are being mirrored back at the European level so strongly that the EC has fallen victim to pursuing hypocritical policy responses: by encouraging migration on the one hand and restricting it on the other, endangering in the process the fundamental rights of millions of individuals in Europe, citizens and residents.

Moreover, considering the broader context of European migration and integration policies, ENAR is compelled to point out the paradoxical language, behaviours and policies put forth by the European Commission on issues surrounding the integration of TCNs in particular, and migrants in general. On the one hand, the EC asserts its commitment to promote integration as a two-way process, protect fundamental human rights, and curb racism and xenophobia in Europe. The EC releases publications and pays for campaigns to promote the significance of valuing diversity, highlighting the benefits of migration, and encouraging the integration of migrants to fill the labour market gaps resulting from changing demographics and an ageing population. Yet it seems that concerns with border control, national security, and costs of protection voiced loudly at the national-level have succeeded in influencing the EC in its integration and migration policy recommendations for EU Member States. The consequence of which, results in restrictive immigration policies, impacting negatively on the initial commitment of the EU to promote diversity and equality for all.

## Ways Forward

ENAR suggests a rewording in the “ways forward” section: The full potential for both the EU and for migrants must be realized when integration policies are applied and managed. Effective integration policies should contribute to economic growth, social cohesion, and the recognition of the value of diversity in Europe.

ENAR recognizes the challenge for the EU and Member States in devising policies on the social integration of Third Country Nationals, particularly at a time when financial concerns have resulted in the emergence of de-integrating societies. Given the increasing discrepancy between the European population and political representatives within the EU, it is particularly crucial that strategies be developed for everyone in society to participate fully.

Based on the evidence gathered by the ENAR Network over the past 10 years in efforts to combat racism, ENAR’s experience demonstrates that where there is an active NGO sector, there is more likely to be strategies, activities and awareness on integration and anti-discrimination. ENAR thus encourages that European, national, and local integration strategies be developed and implemented in genuine partnership with NGOs. Ethnic minority and migrant associations or organized migrant communities themselves should be strengthened and supported through funding and the exchange of best practices to contribute to debates on integration.

Furthermore, ENAR believes that the development of common indicators and benchmarks is essential to monitor and evaluate the outcome of integration policies and identify areas that require improvement. Therefore, ENAR welcomes the call for the European Commission’s support on common European ‘indicators’ in the identified areas of employment, education, social inclusion and active citizenship<sup>1</sup>, to monitor results of integration policies, which should serve as a basis for follow-up. Alongside quantitative and qualitative indicators, improved data collection is also needed to monitor the results of migration and integration policies.

ENAR further welcomes attempts at European level to develop integration tools, such as the ‘Handbook on Integration for policy-makers and practitioners’, the website on Integration, the European Integration Forum, and also the European Fund for the Integration of Third-Country Nationals. Despite these efforts, ENAR recommends that good practice methods not just be considered by Member States but also be implemented at the national and local levels in order to further democratic societies. ENAR encourages ongoing dialogue with civil society for this purpose, as they commonly purport a rights-based approach to EU migration and integration strategies. Finally, ENAR requests the EU Commission and the Member States cognizant of their obligations and moral duties to respect the European human rights legislation and international human rights conventions. ENAR encourages the EU and Member States to commit in particular to the Human Rights Conventions that support migrants’ rights, such as the International Convention for the Protection of the Rights of All Migrant Workers and Their Families. The ratification, implementation, and interlinking of these conventions will strengthen European and national policy and promote the two-way integration approach.

---

<sup>1</sup> Conclusions of the Justice and Home Affairs Council of 3-4 June 2010, Council document 9248/10; Eurostat Methodologies and Working Papers, Indicators of Immigrant Integration - A Pilot Study, [http://epp.eurostat.ec.europa.eu/portal/page/portal/product\\_details/publication?p\\_product\\_code=KS-SF-11-030](http://epp.eurostat.ec.europa.eu/portal/page/portal/product_details/publication?p_product_code=KS-SF-11-030).

In conclusion, ENAR opposes the existing normative idea of Europe's homogeneity and its restrictive immigration and integration policies to embrace and promote the notion of a heterogeneous, inclusive society, which acknowledges and values diverse cultures, ethnicities, races, religions, genders, physical capabilities as well as other distinguishing characteristics. ENAR strives to promote social inclusion by calling attention to policies and practices that fail to embrace a whole society vision, taking into account the multiplicity and diversity of actors as well as the national and regional contexts, historical traditions, popular culture, and contemporary multicultural realities in Europe. We appeal to the European Commission and others working on integration policies to review our recent publications and policy papers on these topics (listed below in the annex), which provide further recommendations and insight into this particular issue.

#### **ANNEXES:**

1. ENAR General Policy Paper on Migration and Diversity
2. ENAR's 15 Principles on Framing a Positive Approach to Migration
3. ENAR General Policy Paper on Third Country Nationals
4. Results of an ENAR policy seminar, Promoting Integration: Migration, integration, social inclusion and anti-discrimination (published 2007)
5. ENAR European Shadow Report 2008 (published 2009)
6. ENAR Policy Response Paper on the Second European Agenda for Integration entitled "EU Integration Policy - How to move forward?" (published August 2010)
7. ENAR Publication "Integration beyond Migration: Kicking off the debate" (published 2011)