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국제학 석사학위논문

**The Immigration Policy of the European Union:
Is There a Tension between National
Citizenship and European Citizenship?
-Cases of France, Italy, Denmark and Sweden-**

유럽연합의 이주정책: 유럽 시민권과 국가
시민권 사이의 긴장과 갈등
-프랑스, 이탈리아, 덴마크, 스웨덴의 사례를 중심으로-

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정 시 영

**The Immigration Policy of the European
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by

Jeong, Si-yeong

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ABSTRACT

The Immigration Policy of the European Union: Is There a Tension between National Citizenship and European Citizenship? -Cases of France, Italy, Denmark and Sweden-

Jeong Si Yeong

The Graduate School of International Studies
Seoul National University

Immigration has been considered as one of the most important issue in the European Union since 2000s. Under the Schenghen Agreement, the EU member states agreed on the free movement of people within the European Union. The European Union has been trying to develop a common immigration policy which can be applied to all the member states. The European Convention highlights European citizenship trying to protect the rights of immigrants within the EU territories. However, it seems that there is a tendency of emergence of far-right parties in Western and Northern Europe. This article deals with the factors which have influence on the tension between European citizenship and national citizenship that currently exists in the European Union. The cases of France, Italy, Sweden and Denmark will be added to help understand the concrete situation of immigration and citizenship policies in Europe.

***Keywords:* EU; Immigration policy; Citizenship; European Law**

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1. Introduction

Immigration has been considered as one of the most important issues in the European Union since 2000s. Under the Schenghen Agreement, the EU member states agreed on the free movement of people within the European Union. The European Union has been trying to develop a common immigration policy which can be applied to all the member states. The European Convention highlights European citizenship trying to protect the rights of immigrants within the EU territories. Along with its history of more than 60 years, the European Union has gained its own special identity by offering 'European citizenship' to its member states. European Citizenship means a shared sense of belonging as European which is called 'Europeanness' while national citizenship is based on cultural homogeneity in a country. By making transnational government and common policies, it seemed that the European Union succeeded in formulating 'European citizens' preparing for the new generation of the community. However, there still remain some questions linked to the contents of the European citizenship and national citizenship. Do the EU citizens feel more comfortable with European citizenship than national citizenship? Do the national citizens accept foreigners from other EU member states as the same under the notion of European citizenship? Contrast to the efforts of EU to combine Europe as a single community, the emergence of anti-immigration sentiment and extreme-right parties in Western Europe show the existence of tension between national citizenship and European

citizenship in Europe.

There are two concrete evidences to prove the existence of tension between European citizenship and national citizenship. The first one is the recent Roma expulsion policies of France and Italy. In 2009, the Berlusconi government announced that the increase of Roma population was a national security threat. The Italian government conducted legislation to clearing Roma residence camps. Unauthorized work became criminalized and fined up to 10,000 euros in Italy. The notorious ‘fingerprinting process’ was introduced as a special measure for identification. In 2010, the Sarkozy French government forcefully expelled more than 1000 Roma from France to Romania or Bulgaria. In 2012, the Socialist government of France expelled 240 Roma more again calling it as ‘volunteer behavior’. This provoked a big controversy both among the European Union and international society. The European Committee on Social Rights claimed that France disturbed the European citizenship of Roma people.

The second evidence of the tension is the backlash against multiculturalism in Sweden and Denmark. These two countries were considered liberal countries with regard to immigration policy. Their governments aimed at multiculturalism based on socialist philosophy and egalitarianism. However, both of Sweden and Denmark recently showed radical shift in their multicultural policies. Far-right parties got more votes in election. Denmark took opt-out when it agreed on the European Union immigration policy. The most evident phenomenon is that both of these two countries emphasize national citizenship than European citizenship.

What kind of social implication does this phenomenon cast to us? Why is this topic important in contemporary European society? Why should we take notice on the tension between national citizenship and European citizenship? There may be many answers but a tendency of problematizing to immigration can be one of the main reasons. On the contrary to international trends and ideology of the EU, national governments of member states are trying to close its frontiers. They perceive immigration as 'threat' not as a way to solve labor shortages and population imbalance. Clustering with other issues like economics, human rights and security, immigration issue is being analyzed in negative way and categorized as 'problem'. This shows a gap between EU's ideology and that of member states generating confusions in many regions where immigrants enter into.

The research question of this article is to find out factors that have much influence on the tension between European citizenship and national citizenship. This article assumes that there are three main factors which have influence on this phenomenon. The first one is anti-immigration sentiment that is rampant among citizens in Western European countries. France and Italy showed a strong anti-gypsyism sentiment discriminating Roma people from Eastern Europe. The French and Italian government enacted laws for Roma expulsion. Sweden and Denmark have anti-multiculturalism sentiment both in politics and civic area. Although Sweden and Denmark were renowned for their liberal immigration policies and multiculturalism, recently they shifted their immigration policies restrictive. Denmark started to emphasize national identity and cultural homogeneity based on

Danish language, Christianity, and Lutherianism. In Sweden, Swedish whiteness became more emphasized than ever before among citizens.

The second factor is the rise of far-right parties in these four countries. In Italy, the extreme-right Northern League party and pro-facist National Alliance won in election in 2008. Flavio Tosi and Umberto Bossi, the leaders of this coalition established emergency law announcing enforcement of national security by border control. They criminalized undocumented people fining them up to 10,000 euros. The Sarkozy government of France also enacted far-right laws in the area of immigration policies. The Sarkozy government enforced expulsion policy for undocumented workers. Immigration became more difficult as well as naturalization. Denmark experienced political climate change since 1993. Several far-right parties joined in Social Democrats, the ruling mainstream right party. The newly joined parties like Social Liberals, the Center Democrats and the Christian People's Party changed immigration policy restrictive. In 2001 election, an extreme-right the Danish People's Party became the third largest party in the parliament. Along with the UK, Danish government finally opted out in agreeing with the immigration policy of the European Union. In Sweden, Social Democrats, the ruling party, barely won on the election by making 'unholy coalition' with Left Party and the Greens. The 'unholy coalition' tried to amend their immigration policy following the route of Denmark and the UK. In 2010 election, a radical right party, the Sweden Democrats, achieved 6% of votes in election. Furthermore, the new racist party entered into the national parliament overtly announcing the slogan

‘give us (white) Sweden back’.

The third factor is the limitation of governance of the EU on immigration and citizenship policy. The Schengen Agreement permitted three-month stay within the EU territory for the EU citizens without any restrictions. Workers who can live without government assistance could stay longer than three months. The Citizenship Directive prohibited any discrimination for the EU citizens based on nationality. Expulsion policy was not allowed in any case for humanitarian reason. However, in practical application, the EU legislation has limitations in enforcement. First, the European Commission does not have authority to appeal forceful measure for law implement so that some powerful member states strongly oppose unpopular EU policies insisting national sovereignty. The Schengen visa policy works differently from region to region. Second, the European Directive defines immigration in ambiguous way so that national governments make their own criteria in classifying immigrants. For example, Roma is not classified as immigrants in Italy. Third, although the EU law guarantees that all the member states should be treated equally, there is criticism that the European Commission is influenced by some powerful member states and geopolitical selectivity are highly affected on the EU policy making process.

As stated above, this article presumes that there is a tension between national citizenship and European citizenship in the European Union. The Roma expulsion policies by French and Italian government, the backlash against multiculturalism in Denmark and Sweden are evidences of this. The research question of this article is

to find out which factors have influence on this tension between national citizenship and European citizenship. To achieve this goal, the way of case study in comparative analysis will be used based on qualitative research. All research will be conducted under the category of immigration issue. In the first part, this article will look over historical pathways of immigration policy in Europe as a whole. The development of common immigration policy of the EU will be also added. In the second part, it will be examined the three main factors which were presumed to have influence on the tension between national citizenship and European citizenship. The first factor is prevalent anti-immigration sentiment in France, Italy, Denmark and Sweden. The second factor is the rise of far-right politics in these four countries. The third factor is the limitation of the EU government on immigration and citizenship policy. All of these case countries, Italy, France, Denmark and Sweden are EU member states and at the same time the Schengen states. These four countries are enforcing restrictive immigration policies recently. Comparing the common immigration policy of the EU and that of these four countries, we may find a clue for understanding the current situation of European citizenship policy in the area of immigration issues.

2. Immigration Policy of the European Union

2.1. European Citizenship and European Identity

Since the establishment of the EU has accomplished more than 60 years, the

European Union has gained its own special identity, offering 'European citizenship' to its members. European Union has tried to build a common political and economic system across Europe, admitting free movement of people among its member states. However, there is still controversy over European citizenship besides national citizenship. Do the EU citizens feel more comfortable with European citizenship than national citizenship? Do they accept foreigners from other EU member states as the same under the notion of European citizenship? Contrast to the efforts of the EU to combine Europe as a single community, the emergence of extreme-right parties and anti-immigration sentiment among member states show the existence of tension between national citizenship and European citizenship in Europe.

For a start, it should be known that where the notion of European identity and citizenship come from. For a long time, scholars have considered the European identity as a patchwork of diverse. Recently, J.Logemann explained the European identity with two definitions. The first one is 'Europeanization', which indicates the self-understanding of individual as European. This type of definition is developed by a view from outside, especially people who are extrinsic to Europe. On the other hand, the 'Europeanness' contends intrinsic motivation in the formation of identity. According to J.Logemann, 'Europeanness' means a shared sense of belonging to Europe as social members. This type of definition could be applied to most European countries and finally brought about the establishment of European Union pursuing a single community. Now rather the European Union

plays an important role in making this type of European identity more multiple and hybrid.

Contrary to European identity, national identity is normally based on territory, language, ethnicity and culture. National identity is more attached to the 'in-group favoritism' in modern society. It relies much on national unity and cultural homogeneity in a country. Different from original citizens of the host country, the second generations of immigrants have multiple ties of nations alongside cultures and languages. Although they are equivalent citizens of the host society, they have different sense of belonging and perception about their identity. Many of them become to take pro-European position growing to an adult, on the other hand, some people in the host country become conservative more and more. Both of pro-European position and anti-immigrant sentiment exist in current European politics and civic area.

There are two theories to explain the background of emergence of anti-immigration politics in European Society. The first theory is interest-based theory which is supported by John Sides and Jack Citrin. According to this theory, people fear the competition provoked by immigration over scarce resources so that they support the right parties which are opposite to immigration. The second theory is symbolic politics theory which emphasizes the role of values and identities. This theory argues that the national cultures and beliefs have a larger impact on attitude toward immigrants than economic concerns. Ethnic definition and cultural homogeneity are key concepts for the sense of distinctiveness of the nation, and

this influences on the degree of tolerance and hostility toward immigrants in the society. In this article, we will explain the immigration issue in Europe on the ground upon the second theory, the symbolic politics theory.

2.2. The Historical Pathways of Immigration in Europe

The immigration pathways of Europe have a long history. The immigration policy of Europe reflects the economic situation of the region. The postwar period is recorded one pinnacle of labor mobility within European continent. The return of military troops, resettlement of displaced persons and refugees all began at this time together. The ageing population and labor shortages since the World War 2 made the policy of European nations more favorable to the acceptance of immigrants from Southern Europe and ex-colonies. During 1950s and 1960s, free movement of labor was allowed between the EC members and Nordic countries also. In the 1970s, massive-scale temporary workers moved from Southern Europe to Western and Northern Europe. Needs for reconstruction and modernization of Western Europe led many foreign worker recruiting under the condition of little or no social planning and legal channels. As a consequence, migrant inflows during this period were out of control of political authorities. In 1973, the Western receiving countries closed its borders for the reason of economic recession and oil crisis. However, despite of the restrictive immigration policies, the number of inflows of people increased continuously. During this period, the groups of immigrants became more varied. Millions of former colonials migrated and achieved guarantee of eventual citizenship. Large-scale guest workers appeared in

Germany, Switzerland, and Austria. Post-colonial migration toward the UK, France, Spain, Portugal, Italy and the Netherlands also widely emerged. Muslims from North Africa, Turkey and Central Asia consisted decent portion of foreign population as well as immigrants from Asia and Latin America. The Scandinavian countries offered a generous and open asylum policy at that time so that numerous asylum seekers entered into Norway and Sweden to avoid political and religious persecution.

The third phase of immigration in Europe emerged under the situation that several major European states were hit by economic recession in 1980s. By the 1980s, immigration policy became to one of the most important issues alongside with economic and demographic issues in the political realm. In the early 1980s, the guest worker program and open door policies leveled off with the end of prosperity of postwar economy. However, even though many of immigrants returned to their countries of origins, lots of them remained in Europe. Family unification and the second generation of immigrants swelled the number of foreign population in European countries. Since the immigration policy became stricter, new social problem arose in society, the illegal immigration. The western industrialized nations began to take a realist policy to control labor migration during this period. Anti-immigration movement went through many mainstream parties and electoral campaigns. By the 1990s, the nature of immigration issues was changed toward social integration and immigrant rights, as well as security matter and demographic replacement. With the changes through introduction of

Single Market System in 1986, the EU encouraged the internal immigration as an effect to build the common market. The ageing population and the shortage of labor made the companies of high-wage member states hire immigrants from low-wage member states. This provoked mass immigration of workers within the European Union. The ever-increasing number of foreigners in European continent called a concern for the rights of immigrants, refugees and asylum seekers. The jurisdiction of European Court of Justice facilitated processes for legal action. International standards of treatment have evolved for the protection of these newly arrived people.

After the collapse of communist regimes, the division between ‘sending’ Southern countries and ‘receiving’ Northern countries became smoother and there appeared a ‘balancing out’ in immigration and emigration among those states. Traditional ‘sending’ countries such as Italy, Greece, Portugal and Spain had no more experience of large-scale emigration whereas many Eastern European countries were experiencing significant amount of emigrant population. A massive migration from Eastern European countries changed the condition of immigration discourse in many European countries. The enlargement of European Union facilitated this movement more. The new migration process brought about the idea of borderless world with the enlargement of the European Union and the extension of globalization process. Member states faced a different facet of migration within their own territories. National or post-national ideas led a thought for the ‘end of history’ in late 1990s and late 2000s.

2.3. Common Immigration Policy of the European Union

The European Union has concerned immigration as one important issue since the beginning. The Treaty of Paris established the ECSC in 1951. The two Treaties of Rome established the EEC and EURATOM in 1957. These treaties founded the free movement of workers within in European Union. However, this policy wasn't become reality until 1968 because in the early phase of the European Union policy was limited by national sovereignty of powerful nations. The Single European Act in 1987 ensured the special privileges for EU citizens compared to 'Third-Country Nationals' (TCN) in Europe. The Treaty of Amsterdam adopted Directives on family reunion and long-term residents (LTR). The 1985 Schengen Agreements and the 1987 Single European Act confirmed the four free movements of goods, persons, services and capital within European Community based on economic purpose. It was aimed at faster dismantling of internal frontiers with gradual harmonization of immigration as long term goals. These treaties removed border controls in its member states allowing free three months stay-permits to EU citizens. However, they blocked the external borders of EC making 'European Fortress' in the region. Many countries in the Western Europe started to enforce restrictive policies including visa requirements, shared identification databases and common border control standards. Schengen-member states use the same Community Visa Code for close monitoring of the movement of people. Because visa policy is not limited by international treaties and national legislation, it is the most commonly used restrictive tool for controlling immigration. The purpose of

visa policy was to prevent the arrival of asylum seekers on EU territory by blocking them in the airport.¹ The visa policy included positive and negative list of countries to ask visa requirement to its nationals.

On the other hand, the EU took 'soft law' Resolutions by the start of the 'Maastricht treaty' of JHA integration in 1993. The Maastricht Treaty on European Union (TEU) introduced the concept of European citizenship for a common immigration policy. Asylum policy, visa policy, immigration policy, third-country nationals and illegal migration were included in that provision. Family reunion, admission of workers, and the status of long-term residents were concerned. During this period, conflicts between national and supranational competences arose: the intergovernmental approach and the supranational approach. The intergovernmental approach tried to institutionalize the issue of asylum and immigration within the justice and home affairs. The supranational approach adopted to facilitate the free movement of EU citizens and to promote equal rights of migrants. The European Information System (EIS) announced how to establish a common policy against racism and xenophobia as well as issues of basic human rights based on the Council of Europe's Convention on Human Rights. However, the Maastricht treaty could not reach an end regard this issue under the inadequate decision making structure and process.

The anti-discrimination provisions based on Geneva Convention were finally included into EU level institutions in Amsterdam Treaty in 1997. It included

¹ Lavenex, 2001

external border controls, visas, and other rights of third-country nationals. Despite of this, the Treaty of Amsterdam provided opportunity for opt-out for the countries like the UK, Ireland and Denmark in the area of immigration policy. Since the European Union enlarged to the Eastern Europe, old member states of EU claimed that the South and Central member states should enforce the Eastern border of the Union to control massive migration. In 1999, the Tampere Summit announced the establishment of a 'Common European Asylum System'. This treaty contended to the fair treatment of TCNs and sympathetic stances toward refugees. The 2000 Treaty of Nice adopted co-decision procedure in making EU immigration policies. However, contrary to European institutions tried to establish a common immigration policy at EU level, practical cooperation among member states was frequently failed by political reasons. The raise of radical right parties in several European countries and the growing concerns about security after 9/11 made EU member states to strengthen the standards on border control. The EU member states preferred to receive high-skilled workers than temporary immigrants. The preference affected on the tensions between openness and territorial closures under the pressure of globalization. As a result, immigration policy was left behind on the hand of national government for a long time.

Related to common immigration policy, three questions of social justice arose on the area of responsibility of states in the late 2000s. In the utilitarian view, economic and other benefits for the greater number should be pursued in the immigration issue as well as other political agendas. In a natural rights view,

immigrants have natural right, so that they can freely move from country to country. In communitarian view, the principle of mutual aid emphasizes respect to outside individuals within the states.² These arguments provided moral base for more liberal immigration policies in the European Union. Since the Lisbon Treaty entered into force on 2009, the European Court of Justice and European Parliament can be able to exercise full jurisdiction on immigration issues at European level, even though countries like the UK, Ireland and Denmark took opt-out claiming that the EU violated the nation's sovereignty. The European Union continued to establish the EU immigration policies called the Stockholm program in the same year. This program was established as a form of Directive which is more simple and flexible to achieve. It ensured fair treatment of third country nationals in the area of immigration law. The Stockholm program entered into force on 2014 except for the UK, Ireland and Denmark.

The Lisbon Treaty and the Stockholm program were evaluated as an advanced step for the formation of common immigration policy of the EU. However, they still have many limitations in reality. The Commission recognized member states' sovereignty concerns and the fear toward directive veto power of the Union. The member states still enjoyed freedom to establish favorable standards in their national law in the area of immigration. The Schengen visa policy works differently from region to region. There exist tacit dividing lines among member states based on a strong geopolitical selectivity. Huysmans contends that there is a

² Walzer, *Spheres of Justice*, 1983

realistic point of view among member states regard to immigration issue.

3. Factor 1: Anti-Immigration Sentiment among European Citizens

3.1. Anti-Gypsyism Sentiment in Italy and France

3.1.1. Anti-Gypsyism Discrimination

To explain Roma policies of France and Italy, it should be defined the exact identical boundary of Roma dealt within this article. Because the word 'Gypsy' carries negative connotations, this article will use the term 'Roma' to examine this multitude community and its minority groups. Roma is estimated to arrive at Europe around AD 1000 from India. During 1300s, they firstly settled in Romania and then spread out toward Eastern and Western Europe during 15th century. Anti-Gypsyism discrimination has a long history in Europe. In the middle ages, Roma was linked to evil or vagabonds. Roma was considered as people who were voluntarily exiled from the dominant society. They normally didn't have their own houses and professions. Both in private and public domain, Roma received persecution and discrimination with negative stereotypes. Since 1400s, Roma was enslaved by the Ottoman Empire. The enslavement and persecution lasted until 1800s in Balkan. This tradition affected on people's misconception that Roma was inferior to members of dominant society. As a result, people supported violence against Roma in public overtly. In 1500s, Roma was forcibly expelled by many European countries. In France, there were so-called 'gypsy hunts' who physically

attack Roma in public. The Great Britain enacted laws to exile Roma to America and Australia in 1600s. Portugal sent Roma to Angola and other South African islands. In Spain, Roma was considered as magicians but also persecuted and exiled to Brazil during 1700s. Scotland sent Roma to Jamaica and Barbados while the Polish Roma was exiled to Siberia. Other European countries have similar stories.³ It was considered that this long tradition have influenced on one distinctive culture of Roma, nomadism.

Under the occupation of Nazi regime during the 20th century, numerous Roma people were sent to extermination camps and Holocaust. It is estimated that from 220,000 to 1 million Roma people were murder during this period.⁴ Over 90% of Austrian Roma were systematically killed and approximately 11,000 Roma was disappeared in Romania during the wartime. Despite contemporary Roma policies differ much from that of the early twenties, there are sill anti-gypsyism and racism in European society. Balibar argues that there is ‘new European racism’ which turned from biological racism to cultural racism legitimating exclusion of ‘others’.⁵ Although the degrees are different from country to country, anti-gypsyism is a common phenomenon all over the Europe. The EU Fundamental Rights Agency (FRA) demonstrated a result of survey that both in Western and Eastern Europe,

³ Gernot Haupt, *Anti-gypsyism and migration*, the Alpen-Adria University of Klagenfurt, Austria, 2012,

⁴ United States Holocaust Memorial Museum, *Education Sinti&Roma*

⁵ E.Balibar, *Racism and Politics in Europe Today*, New Left Review, 1991

Roma was selected as the most disliked ethnic minority. ⁶ Scholars argue that anti-gypsyism should be interpreted not just with ethnicity but with political, social and economic context of the dominant society. The image of ‘nomadism’ is most frequently used by politicians to instigate voters in establishing expulsion policies or restrictive immigration policies. Media also attributes to form negative sentiment toward Roma by linking them to poverty and criminality.

In the 20th century, scholars started to point out that the Roma identity was not homogeneous across countries and regions. There are various Roma communities and subgroups; Roma, Sinti, Kale, Kalderash, Gypsies, Boyash, Yenish, Dom and Lom, etc. ⁷ It is known that nomadism, marginality and kinship bonds are commonly emphasized among Roma people. However, each group has different culture as well as different ethnicity. For example, the Sinti has its own ethnic identity which opposed to that of mainstream society. The Kalderash Roma uses Romani language, which almost has been lost among other Roma groups or just has remained as dialects. Also there are groups which believe the Roma law (romaniya). For its believers the romaniya is superior to non-Roma law. There are special Roma churches which accept distinctive Roma culture. There is debate about whether Roma has a certain common identity or not. However, in recent

⁶ European Union Agency for Fundamental Rights, *The Situation of Roma EU citizens Moving to and Settling in Other EU Member States*, 2009

⁷ European Commission, Communication from the Commission to the European Parliament: National Roma integration strategies, 2012, 226p

studies, some scholars argue that Roma has a pan-ethnic and non-territorial identity. Differently from the claims of conservative politicians in Western Europe, most of Roma do not prefer to live an itinerant life rather want to settle in the host society for economic and social reason. For the protection of economic and social rights of Roma, both of transnational organizations and Roma itself try to make solidarity and single group identity. They say that transnational organizations attributed to communication of subgroups of Roma scattering across countries. Catholic Church, human rights institutions, civic organizations also contribute to this activity. They fight together against racism, xenophobia, discrimination.

The Council of Europe estimated that there were approximately 12 million Roma people in Europe. Large number of European Roma population live in Eastern Europe. The majority of the population resides in Romania, Bulgaria, Hungary and Slovakia. Romania has approximately 2 million population of Roma within its territory.⁸ Since Romania and Bulgaria joined in the European Union in 2007, Roma people who are from these countries are European citizens. Legally, the European Convention and Shenghen Agreement declare that EU citizens have right to move freely within the member states. However, Western European countries show concerns about the movement of Roma from Eastern Europe to Western Europe. Although the number of Roma in Western European countries are relatively small, the EU enlargement after the collapse of communist regime called

⁸ Mark Featherstone, "*Eventhe Rats Don't Come Here*", Cultural Politics, Duke University, 2013, 3p

an enormous migration flow of Roma. Large size of Roma people migrated from Eastern Europe and Balkans to escape ethnic conflicts, persecutions and poverty. The newly arrived Roma in Western Europe does not have formal employment and legal status. Access to healthcare is limited for them. Also, many of them are exposed to discriminative and xenophobic treatment from the host society. France and Italy strongly oppose to accept Roma people into their territory even contradicting the equal treatment of citizens by EU law. Urban Paris and Rome turn to be notorious for conflicted spaces and social marginalization among Western European countries. The isolated Roma camp became the first target of Italian and French government to display their immigration control. In Italy, the Roma people are disadvantaged being categorized as folk devils. Cioran criticized that in Paris, Sarkozy government pursued Anglo-American utopia while alienating of Roma and other ethnic minorities. The called the anti-gypsyism as a weakness of humanity. O’Nions criticizes that the low employment and educational performance of Roma is the result of discrimination policy of French and Italian government toward ethnic minorities.⁹

3.1.2. Anti-Gypsyism Discrimination in Italy

There are two main groups of Romani in Italy; Roma and Sinti. Roma has lived in south Italy since the early 1400s. Roma mainly lived in the city of Rome, permeating the Italian society. Sinti normally lived in northern Italy maintaining

⁹ O’Nions.H, *The Protection of Minority Rights: The Roma in Europe*, Ashgate, 2007

the life-style with caravans and mobile houses. Some of them were categorized as Italian citizens but others who have recently arrived from Romania or Bulgaria couldn't get that status. Roma was discriminated since the Middle Ages. Under the regime of Nazi and Mussolini, Roma was linked to diseases like cholera and expelled from Italian territory.

Italian Constitution guarantees equality of people under the law regardless of their national, origin, gender or race. The Constitution declares that the government should obey international standard for human rights. Italy has law for protection for ethnic minorities. Italian government also agreed de facto regulation by European Union.¹⁰ However, Italy is renowned for its complex immigration policy because it has showned both of generosity and hostility toward immigrants. Immigrants in Italy increased rapidly since 1980s, especially in hidden economy. Most of immigrants engaged in agriculture, tourist industry, fishing industry, the household and personal services. Italian government only authorized foreign workers in agriculture. The 'Martelli Law' in 1990 encouraged socio-cultural integration of immigrants. The Law facilitated to accept extended political refugees and asylum seekers. Contrary to this, Italian government imposed heavy fines and penalties on unauthorized foreign workers. The government allowed to expel these unauthorized workers to their countries of origins.

¹⁰ ¹⁰ Deirdre Ziegenfuss, *Zingari or Italiani? Discrimination against Roma in Italy and the European Court of Human Rights*, 2011, 565p

In 2008, the far-right Northern League party and pro-facist National Alliance won in election. Flavio Tosi and Umberto Bossi, the leaders of coalition, declared anti-Gypsy slogan overtly. In the same year, local governments started to conduct clearing Roma residence camps in the cities of Rome, Verona, Milan and Naples, etc. In 2009, the Berlusconi government established emergency laws which was targeting Roma population in Italy. Berlusconi announced that the increase of Roma population was a national security problem which should be urgently solved. The government legitimized the expulsion of Roma by the law. The notorious ‘fingerprinting processes’ were introduced as a special measure for identification. Illegal immigration and unauthorized work in Italy became criminalized so that government began to fine up to 10,000 Euros for undocumented people.¹¹

These restrictive policies of Italy brought about a big controversy among the EU member states and other political activists. The European Commission strongly condemned Italy that the fingerprints process and DNA samples tested by Italian government evidently violated the European Convention of Human Rights. Catholic Church and Roma groups also criticized those policies as racist. Many critics argue that the public perception about Roma in Italy is considerably distorted. Social scientists and Roma-NGO survey institutions said that very few Roma and Sinti are actually nomadic while over 90% of them are sedentary.

¹¹ Claudia Tavani, *Keeping the Criminality Myth Alive: Stigmatization of Roma Through the Italian Media*, 2005

According to them, the increased number of Roma in Italy was overestimated.¹² They criticize that Italian government makes Roma as scapegoats to avoid the responsibility of economic crisis and social unrest. They point out that the expulsion policy is just a symbolic action to show the government's willingness to control immigration issue to attract more voters. Contrary to the claims of conservative parties, the critics show doubt that the removal of Roma would bring about economic and social stability including security. They insist that Italian government encourages racism and xenophobia among citizens and these will provoke more conflicts and extremist rather than safety and security.

3.1.3. Anti-Gypsyism Discrimination in France

For the last two centuries, migration from outside lasted with the economic prosperity and labor market expansion of France. Since 1851, France accepted immigrants from Russia, Belgium, Poland, Italy, Spain and Portugal. From 1920s to 1930s, during the interwar period, France maintained high number of immigrants to prevent population decline. France lost 1.4 million population out of total 40 million population in the First World War and most of the lost population were young generations. France also had the lowest fertility rate among all European countries. For military needs and labor supply, France accepted manpower outside the country and encourage them to settle in France to boost domestic economies. Most of the immigrants were from Southern and Eastern

¹² ¹² Michael Stewart, *The Gypsy 'Menace'. Populism and the new Anti-Gypsy Politics*, London, 2012

Europe, and North Africa based on colonial legacy with France.

At the end of the Second World War, cumulative numbers of Algerians migrated into France after the decolonization of the country. From 1950s to 1960s, many Algerians supported labor supply of France to reconstruct infrastructures which were destroyed during the war. France were enjoying economic prosperity at that time so that there were no concerns for accepting immigrants. However, the situation was changed in 1970s. The number of foreign population in France reached approximately 3.6 million, 6.3 percent of the total population. The baby boom generations began to feel anxiety for the increasing number of Algerians. It was mainly because of the increase of Muslim population in France and the change of population composition in the country. The North African immigrants gradually settled in forming communities based their collective identity such as language and religion.¹³

Along with the oil crisis, economic prosperity ended in France so that French government reversed its immigration policy into restrictive way. Immigration was only allowed through family reunification. By the 1980s, the number of immigrants fell to about half compared to 1970s.¹⁴ In the late 1980s, immigration for family reunification dropped also as government policies became restrictive more and

¹³ G. Papademetriou, Kimberly A. Hamilton, *Covering Paths to restriction: French, Italian and British Responses to Immigration*, New York, Carnegie Endowment of International Peace, 1996

¹⁴ Martin A Schain, *The Politics of Immigration in France, Britain and the United States*, New York, Palgrave Macmillan, 2008

more. In 1990s, France joined in European Community. France agreed free movement of labor within EC countries. During the 1990s, instead of receiving more immigrants from other EC countries, France closed its border toward outside of EC. France became known for one of the leading countries declaring war against illegal immigration and unauthorized employment. France strengthened its border control and became the least receptive EU country in accepting asylum seekers.

Although France had social integration model and assimilation programs, there was lack of support for collective rights for ethnic minorities in France. Multicultural education was rare in France while nationalism, racism and xenophobia were common in public. The Pasqua law reduced welfare benefits for undocumented immigrants and facilitated expulsion. The law enacted two years of waiting for the spouse of immigrants to get document. The Mehaignerie law set more residency requirements for Algerians. The Constitution was amended to control the number of asylum seekers and refugees. The Chevenement law made family reunification more difficult. Special visa was issued only for highly qualified workers including scholars or scientists. In 2003, Sarkozy law enforced expulsion policy. The law lengthened period for naturalization upto 2 years. Language test was also introduced to qualify for family reunification.

In 2010, the French government conducted expulsion policy to Roma who live in Paris. Sarkozy government forcefully sent more than 1000 Roma to Romania or Bulgaria with 300 euros financial support, although they called it as 'volunteer

behavior'.¹⁵ In 2012, the Socialist government expelled 240 Roma again from French territory. The recent expulsion provoked a big controversy both within the European Union and international society. Human rights institutions and NGOs condemned that as an evident racist action. The European Committee on Social Rights claimed that France disturbed the European citizenship of Roma.

3.2. Anti-Multiculturalism in Denmark and Sweden

3.2.1. Multiculturalism in the European Union

Cultural diverse is not a new topic in European countries. Since many of them have experienced almost zero population growth in early 20th century and lost lots of labor force because of the World Wars, immigration became one of principle way to solve labor shortage problem. Immigrants continuously arrived at European continent during the last century and the European Union facilitated this process swifter. The most noticeable change in cultural aspect is the growth of Muslim population in European society. This brought about big controversies related to multicultural integration policies among politics and citizens.

James Scott argues that society is defined with the image of people who shares same social entities, a sense of belonging and similar understanding of collective life. According to him, people form a cultural consensus within a society at the same time exclude certain people who do not share mutual features. Dislocation by

¹⁵ Doughty Louise, *France deserves to be kicked out of the EU for deporting Roma People*, Guardian Unlimited, 2010

decolonization or migration can provoke big changes in the formation of self-image of individual. As a consequence of dislocation, distinct cultures can exist in a single society. A society which has more than two distinct cultures is called multicultural society.

The civil discourse on multiculturalism embrace all kind of shared features (cultures) based on humanity. In the civil sphere, the range of culture is diverse and generous. The European Union was established in the ground of civil discourse on multiculturalism to erase the trauma of the past two world wars. Along with its foundation, the European Union emphasized multicultural society for supranational collaboration by making the image of cosmopolitan Europe. Since 2000s, the globalization trend brought about new situations all over the world including Europe. As a result, multiculturalism became one of the most frequently mentioned issue in European society. Normatively, multiculturalism is referred as ‘an ideology which attaches positive attitude toward cultural diversity in various ways’. However, in the European Union, multiculturalism has more specific definition: a peaceful coexistence of people that have diverse origins.

There are two perspectives dealing multiculturalism in European society. Scholars who support the first perspective argue that immigrants and ethnic minorities should be able to preserve their own culture even though they assimilate economically. They insist that all the members of society have equal right to maintain their unique cultures as well as being treated equally by other members regardless their cultural distinctiveness. The point of this argument is that cultural

distinctiveness is one elements for diversity like nationality, gender, or class. On the other hand, the second perspective criticizes that the multiculturalism separate social entities by too much emphasizing distinctiveness of new arrivals. William Schinkel who support this perspective insists that it is culturism not culturalism that exists in European society. Culturism is an anthropological term which claims that different cultures should not be mixed. Culturism is less tolerant in accepting new culture. When social problems should be explained, culturism puts culture on the very core. Schinkels points out that when it comes to multiculturalism, culture is too much emphasized and separating people in European politics.

Multiculturalism policies include government's support for new arrivals. The government tries to guarantee right to represent cultural and religious customs of immigrants. As well as financial support, social support to integrate ethnic minorities into the host society is also considered important. The Multiculturalism Policy Index (MPI) provides a certain criteria to measure multicultural policies; constitutional affirmation of multiculturalism, school education for multiculturalism, public media report, dual citizenship, funds for ethnic organizations, bilingual education, action for disadvantages minority groups. The Citizenship Rights for Immigrants (ICRI) provides other criteria for multicultural policies. Different from MPI, the criteria offered by ICRI is focused on the rights of immigrants; rights for religious practices outside public institutions, rights for cultural education in public institutions, rights for political representation, absence of assimilation requirements, preferential hiring immigrants as workers.

Although the European Union stipulated multiculturalism as one of the major norms, multiculturalism is discredited both in public and politics recently. In 2010, the Chancellor of Germany announced that multicultural policies were a failure in Germany. The British Conservative Leader called multiculturalism a disastrous doctrine. Populist dialogue became common in public. The majority of national citizens prefer to have restrictive naturalization policies using high standard of language and history test.

3.2.2. Backlash against Multiculturalism in Denmark

Historically, Denmark was a predominant power in Scandinavia together with Sweden. Both of Denmark and Sweden pronounced liberal policies on immigration since 19th century. Danish Palace outlawed all kinds of racial discrimination. Ethnic minorities and religious communities could organize official council with permission. During the Nazi occupation, Denmark heightened protections for Jew and other minorities within its territory. Less than 5% of Danish Jews were arrested by Nazi during the wartime. Denmark maintained tolerant and liberal immigration policies during the 20th century. Denmark operated smooth welfare system emphasizing social cohesion and alternative lifestyles. There was no tradition of racism or xenophobia in Denmark. Traditional Nordic convictions of egalitarianism was more prevalent rather.¹⁶

¹⁶ ¹⁶ Harald F. Moore, *Immigration in Denmark and Norway: Protecting Culture or Protecting Rights?*, Scandinavian Studies

During 1970s, the number of immigrants and refugees increased than ever before. As a consequence, the integration of immigrants became one of important political agenda. In 1981, Denmark introduced allowance for election rights for immigrants after three years of residence. The 1983 immigration law allowed full rights of welfare benefits to immigrants and refugees. Denmark emphasized the principle of internationalism, humanitarianism and post-national membership. The individual rights of immigrants were considered superior to government's ability. At that time, politicians highlighted the benefits of cultural diversity and most of citizens had no repulsion to it.

In 1990s, the number of refugees increased drastically in the aftermath of the Iran-Iraq war and the civil war of Yugoslavia. On the contrary to most of European countries dealt immigration issue as one of the top political agenda, there was silence in Danish politics. However, in public debates, the duty of self-supporting and efforts for integration of immigrants themselves arose as an issue. Positive support for multiculturalism policy decreased steadily while demand for requirements for permanent residency sharply increased. Danish media reported immigrants with negative views. Media made 'othering' of immigrants using terms like foreigners or guest workers. Economic crisis and unemployment rate influenced on politicization of immigration issue among public. Trade unions showed hostile attitude toward liberal immigration policies. Trade union traditionally protected the rights of all workers regardless of their nationals, however, local labor began to consider immigrants as competitors. The rise of anti-

immigration movement in Denmark surprised other European countries. Danish government tried to establish restrictive immigration policies to match the voters' requirements. Denmark finally opted-out for the European Union common policy on immigration issue.

Mouritsen argued that there is a reinvention of Danish national identity in the background of that Denmark became nationalistic. He pointed out that the radical change of Denmark demonstrated turning back toward national identity based on blood-and-soil concept. According to him, Denmark is making a special feature of ethno-cultural homogeneity and perfectionist citizenship. The elements of homogeneous ethnic-civic identity include Danish language, Christianity, Lutheran individualism, egalitarianism and democracy.¹⁷ Recently, Denmark seems to make efforts clearing their national identity based on these elements.

3.2.3. Anti-Multiculturalism Sentiment in Sweden

Traditionally, Sweden didn't adhere to positive attitude toward multiculturalism. Sweden only had 1% of foreigners within its population in the early 1900s and most of the foreign population was Finns and Lapps. During 1920s, Sweden had restrictive immigration policies as other European countries did. However, Sweden verged into a country with multiculturalism since early 20th century and this was astonishing when it considers that Sweden was a homogeneous society both

¹⁷ Per Mouritsen and Tore Vincents Olsen, *Denmark between liberalism and nationalism*, Ethnic and Racial Studies, 2013

ethnically and culturally. Most of other Western and Northern European countries didn't have multicultural idea at that time. Aftermath of the wartime, as many European countries were devastated, Sweden opened its door for immigrants partially at first. Sweden accepted Norwegian and Danish Jews because Norway and Denmark were occupied by Nazi. After 1945, more Norwegians and Balts arrived in Sweden. At that time multicultural policy wasn't concreted yet so that the Swedish government just had immigrants adopt Swedish customs and culture. Among Balts, Estonians were integrated into Swedish society most quickly but maintained strong collective traditions for the longest time.

In 1950s, immigrants from Turkey and Greece newly arrived in Sweden. Different from Norwegians and Balts, these people weren't quickly integrated into Swedish society. Swedish government tried to find remedies including language training and education although most of these efforts were temporary solution. In 1960s, there was an important change that Sweden entered into a welfare-society. The government got to have social and moral responsibility both for the original citizens and immigrants. Furthermore, Finland required Swedish government to allow Fins in Sweden to maintain their language and cultures. Because Finns labor were occupying decent part in Nordic labor market channels, Finland collected cultural and linguistic rights for Finns in Sweden. In 1970s, Swedish Constitution guaranteed governmental support for immigrants and ethnic minorities to preserve their language, culture and religion. Sweden didn't have any minority legislation before. Sweden was not a new country but an old nation which was a regional great

power in Northern Europe. Sweden even didn't have experience of colonial power. The uniformity of custom and religions in Sweden was strong. However, radical change could happen. In 1975, immigrants were given rights to vote after three years of residence. Sweden was riding of economic prosperity at that time and large-scale immigrants formed a new employed underclass under this situation.

During 1980s, Sweden entered into a multicultural society from a homogeneous society. Sweden put up a slogan of multiculturalism emphasizing 'equality, freedom of choice and cooperation'.¹⁸ The model of Swedish welfare state compromised balance between left and right parties accepting cultural pluralism. The principle of comprehensiveness, universalism and social entitlement attributed to form positive stance toward multiculturalism.¹⁹ Assimilation and naturalization process became easier in Sweden. Socialist Sweden claimed that all the population should benefit same welfare provisions without any exception of immigrants and refugees. The corporatist Sweden encouraged immigrants to organize nationwide political associations to promote their own rights and benefits. After this period, Sweden changed its self-image as a tolerant and respectable country for immigrants. Sweden also became a multiculturalist model among European countries.

When it comes to multiculturalism, it seems evident that Sweden holds on a

¹⁸ Harald Runblom, Swedish Multiculturalism in a Comparative European Perspective, Sociological Forum, 1999

¹⁹ Allard, Erik, *The civic conception of the welfare state in Scandinavia*, The Welfare State East and West, Oxford University, 1986

different side from other countries. During last several decades, Swedish government supported immigrants to preserve their cultures from nations of origin. Swedish government also financed immigrants to be integrated well into the Swedish society without losing their own identities. Until the end of the 20th century, no extreme-right parties or racist parties could get major votes in election on the ground of welfare state ideology. Despite all the neighbor countries legislated restrictive laws for immigrants, Sweden kept multicultural policies. In the late 2000s, Swedish center-right government enacted different immigration policy from other Western and Northern European government. Sweden opened its border toward new EU citizens despite there was a tendency of large transnational migration from Eastern European countries. Sweden didn't make any transition rules neither discrimination between low-skilled and high-skilled workers. It seemed puzzling that at that time Sweden was experiencing a severe economic recession. The GDP of Sweden sharply went down during 2008 to 2009. There were already high number of unemployment immigrants and asylum seekers within the country. However, Sweden continued to accept more immigrants from Eastern Europe and even TCNs (Third Country Nationals). Scholars designated these as 'Swedish exceptionalism' in political concept.

However, yet it is hard to conclude that Swedish multicultural policies have succeeded. There is criticism that a wide gap between official rhetoric of government policy and real social condition exists. Sweden didn't have experience of imperial power over colonies. Sweden declared a radical shift to left-liberal

policies and pursued a multicultural society since 1960s. However, the image of Swedish whiteness still remains by current moment. Keskinen said that Swedish people had race fantasies during the 19th century influenced by other European countries. For a long time, Race Science was actively studied in Sweden, and Sweden managed effective eugenicist programs during the early 20th century. Tobias Hubinette added on this that there are white privileges in Swedish society. Tobias said there is a notion of Swedishness as whiteness. According to him, the Nordic race myth contains that Swedish white is the most physically perfect people on earth. The idea of being Swedish requires being white as a core element.²⁰ Even though Sweden was famous for its anti-discrimination policies among EU member states, the public treatment toward non-whites wasn't different from other European countries. There are 2.3 million foreign people in Sweden which are 25% of the total population. The 8% of total population are non-white. Non-white Swedish people respond that they have ever received discrimination in a certain extent although most of them were born and grew up in Sweden. In labor market, white workers unite under the idea of 'white supremacy' expressing overtly nostalgia to Swedish whiteness. Politics refer non-white Swedes as 'foreigners', 'non-Swedes', 'non-Christian' or 'non- Lutheran'. Racism, discrimination and xenophobia are mentioned also in Swedish society. The frequency of occurrence of

²⁰ Tobias Hubinette and Catrin Lundstrom, *Sweden after the Recent Election: The Double-Binding Power of Swedish Whiteness through the Mourning of the Loss of 'Old Sweden' and the 'Passing of 'Good Sweden'*, Multicultural Center, 2011

these phenomena records that the degree of anti-multiculturalism in Sweden does not present a great contrast from Denmark, Norway and the Netherlands. Right party politics also emerge in Sweden recently. It is clear that there is something changed or unproven as to Swedish multiculturalism.

4. Factor 2: Right Party Politics in European Countries

4.1. Right Party Politics in Italy and France

4.1.1. Right Party Politics in Italy

Before 1990s, Italian political system was in extensive corruption and poor administration. At the expense of good government, Italy achieved temporary political stability. After 1990s, when the corruptions were exposed to publics and the ruling party lose its support, new parties started to get opportunity to fill up spaces of the parliament. The Christian Democrats, the Democratic Party of the Left, the Northern League and Forza Italia all emerged during this period.

Umberto Bossi and Silvio Berlusconi are two very famous leaders in race-conscious discourse in Italian politics. Northern League(LN) led by Bossi pursues the preservation of a wealthier northern identity against that of the poorer South by challenging a centralized state. The main goal of Northern League is promoting regional autonomy which is 'threatened' by internal and external immigrants. As a result, the agenda of Northern League is anti-southernism rather than anti-immigration. From 1983 to 1994, political support for Northern League grew rapidly mainly by northern people. Because the Northern League was only based on

the North Italy, Bossi tried to make a calculated strategy to expand its support ground. To observe middle class voters across the country, Bossi transferred xenophobic condemnance from southerners to black and Arabian immigrants. As a radical populist leader of Northern League, Bossi blamed immigrants for rising unemployment, crime and insecurity. In 2001 election, Northern League made a successful coalition with a neo-populist party Forza Italia led by Berlusconi. This coalition pushed three key issues including anti-immigration, suspicion of the European Union and regional base grass-roots political system in Italy.

Different from Bossi, Berlusconi emerged out of a political nowhere. Although Bossi's Northern League and Berlusconi's Forza Italia made alliance to win the government, Berlusconi is one strong opponent of Bossi. Umberto Berlusconi is one of the Italys's wealthiest businessman. He sales and buys villas, footballers, television channels and entertainers, supermarkets and publishing companies, etc. Berlusconi made his populist style filling a gap between corruption scandals and recent political collapse by imaging himself as an anti-politician. Berlusconi pronounced neo-liberal capitalism issuing globalization to attract capitalists and middle class. However, on the other hand, he adopted anti-immigration legislations formed by its political allies, the Northern League. Berlusconi introduced the toughest anti-immigration law(the Bossi-Fini) in Europe in 2002. That law allowed government to destroy camps of illegal refugees. The most notorious action of Berlusconi government on immigration issue was the media propaganda. The print and television media primarily owned by Berlusconi broadcasted sensitive contents

related to immigrants pronouncing that Italy was losing control of the immigrant waves. Apart from Bossi, Berlusconi express this agenda more moderately so that his Forza Italia became popular than Northern League. Despite the fact that the relationship between Bossi and Berlusconi is complex and fragile, it is evident that these two populist leaders strongly affected on the far right political movement and anti-immigration sentiment in Italy.

4.1.2. Right Party Politics in France

National Front(FN), the far-right party in France was founded in 1972. It started as a marginal party at first, however, it soon broke through the parliament in 1984 European election in 1984 with 11.2 percent of the vote. In 1986 legislative election, FN won 35 representative seats in the National Assembly. From a marginal party, the National Front became an institutionalized party in French politics during 1990s. Jean-Marie Le Pen, the leader of National Front got 15.3 percent vote in the 1995 preidential election.

Jean-Marie Le Pen had a strong ability to mobilize extremists in both left and right. Not surprisingly, more than 70 percent of extreme right voters supported Le Pen during the 1995 presidential election. More interestingly, 15 percent of extreme left also voted to Le Pen in the same election. National Front officially announced oppose to European integration and the Maastricht Treaty. Le Pen made rhetoric of scapegoat targeting immigrants. Le Pen directly linked immigration with unemployment, security and social order. Falter and Schumann surveyed that men and young adults were the main voters for National Front while women, older

voters and Catholics less supported them. They insisted that educational attainment and far-right support is non-linear. The support for National Front was more based on extreme-moderate cleavage rather than age, gender or education.

Contrary to that older parties are losing its supports and influence on French politics, many scholars assume that National Front will maintain its support ground for decent period. This is because while voters want faithful identical legacies on parties, older parties is losing specific identities in terms of the left-right cleavage. Le Pen emphasizes national identity and security as key concepts of its political agenda and immigration is one of the most important issue for National Front. This feature differentiates FN from other parties by collecting strong loyalties of voters in extreme. Contrast to the continued silence of other parties on immigration issue, National Front express its evident political identity toward immigration and European integration with its inflexible policies.

In recent elections, National Front is attracting more support than the ruling Socialist Party. Socialist Party recorded the worst result in its history of elections being called 'catastrophe'. People support Le Pen's announcement to build the Europe of sovereign nations. The National Front seem to create a pan-European alliance of far-right parties promising its supporters to return countries to older times.

4.2. Right Party Politics in Denmark and Sweden

4.2.1. Right Party Politics in Denmark

Like other Nordic countries, Denmark is the one of highly developed welfare

state in the world. The issue of welfare benefit is the most concerned topic when it comes to immigration policies. In Denmark, the immigration issue refers to the question of immigration integration and asylum policies. Despite the number of immigrants in Denmark is lesser than in Sweden, political attention on immigration and anti-immigration sentiment are higher. Negative public attitude toward immigrants is stronger compared to other European countries. Different from Sweden, Danish extreme-right parties have actively worked for relatively long time related with immigration policy. During the 1980s, Danish politics were dominated by bourgeois parliamentary majority, the Social Democratic. The government didn't have much attention on immigration issue at that time. However, from 1989 to 1993, the coalition of mainstream right and extreme-right parties changed the political climate. Social Liberals, the Center Democrats, and the Christian People's Party joined in Social Democrats government. The Social Liberals raised immigration issue to attract more votes during the election. The Social Democratic/Social Liberal government made restrictive immigration policy and showed anti-immigration slogans. This strategy was successful to win the government. Aristide Zolberg argued that immigration issue gave opportunity to both of left and right parties in Denmark. As a consequence, Denmark showed radical change in attitude toward immigrants. Danish immigration policies became most restrictive than any other Northern and Western European countries.

In 2000s, decent number of voters showed concerns about government immigrant policies as well as Sweden's membership in the European Union.

Citizens who oppose government's immigration policy became 25% from 4% of 1987. In 2001 election, the Danish People's Party became the third largest party in parliament. Danish People's Party tried to restrict all forms of immigration from outside. The party reduced social benefits for refugees to avoid 'welfare refugees'. The Party also made legislation for immigrants to respect Danish values. Immigrants were obliged to pass difficult test to obtain equal rights in Denmark. Christianity was re-emphasized in cultural discourse. Danish government tried to make 'deep' integration by adapting national cultures. Family reunification was allowed only in case when the immigrant spouse is more than 24 years old. New education program was introduced in labor market, which contained obligations for immigrants; Danish language became a prerequisite for permanent resident, immigrant children were categorized as bilinguals and there was no programs for multiculturalism. As time passed by, Muslims became excluded groups steadily in Danish society. The DPP played a major role in establishing all of these policies. In 2005, Denmark rejected dual citizenship.

4.2.2. Right Party Politics in Sweden

Sweden is known for no evident political extreme between left and right. Sweden is considered as maintaining consensual position on immigration issue. As already known, in Sweden both of left and right parties supported liberal immigration policies and multiculturalism for many decades. Social Democrats, the ruling party since the Second World War, has maintained open and multicultural policies on immigration issue. Apart from other European countries, strong anti-

immigration party couldn't get attention by Swedish citizens. Only the New Democracy, the radical right, made a good fight in 1991 election getting 6.7 percent of the votes.²¹ However, even the conservatives didn't show interests on immigration policies in Swedish politics for a long time.

However, by the 2000s the situations has changed. Linda Berge said that ideological preference has recently affected on the party preferences in the area of immigration issue. Social Democrats were losing public support from that time. New center-right party alliance emerged as opponent of Social Democrats; the Center Party, the Moderates, the Liberal Party and the Christian Democrats. In response to this, Social Democrats made 'unholy coalition' with Left Party and the Greens regardless of their ideological position. The 'unholy coalition' barely won on the election. After having access to power, the coalition became more liberal and labor friendly calling themselves 'new workers party'. This totally contradicted the policy of radical right parties. When the 'unholy coalition' passed the legislation for accepting more immigration from Eastern Europe, the public and news media changed their support from Social Democrats to the New center-right party alliance.

As a result, the ruling party needed to amend their policy line to win the government. Social Democrats began to follow route of Denmark and the UK. The ruling party started to establish transition rules for TCNs and new EU citizens. The

²¹ Christoffer Green-Pedersen, Jesper Krogstrup, *Immigration as a political issue in Denmark and Sweden*, European Journal of Political Research, 2008

Social Democrats and the Left Party made solutions to reduce the number of unemployed immigrants and the cost for social benefits for them. A proposal was suggested which declared that only 'real' workers could get welfare benefits from the government. However, other coalition parties such as the Greens, the Moderates, the Christian and the Center Party were still supporting liberal immigration policies. There was a tense in the coalition between the Social Democrats and others so that the immigration policies of Sweden were incoherent during that time. When Sweden assumed EU presidency in 2009, Swedish government supported free movement of people and open market policy through the Stockholm Program which was different its national immigration policy.

In 2010, the Sweden Democrats (*Sverigedemokraterna*), a radical right party, achieved 6% of votes in election. The Sweden Democrats underwent the slogan of 'Give us Sweden back'. This new racist party successfully entered into the national parliament. Scholars interpreted this as dissatisfaction of voters who led the movement of anti-racist campaign during election. As referred by media, the number of immigrants increased who are thinking Sweden as multicultural utopia. The survey conducted by European Monitoring Center on Racism and Xenophobia in 2000 showed that Swedish people were positive to immigrants but the difference were not striking from other countries.²² Despite Sweden is famous for its progressive social policies, surveys show that Swedish considered themselves as

²² European Monitoring Center on Racism and Xenophobia, 2000

historically homogeneous white. It is assumed that many Swedish citizens are worrying that traditional Swedish characteristics are threatened.

5. Factor 3: Limitation of Governance of the EU on Immigration Policy

5.1. The European Union and European Citizenship

It is referred that one of the main reasons of the existence of tension between national citizenship and European citizenship is the uncertainty of the European citizenship within Europe. The range of the material scope of EU law and jurisdiction of the European Court of Justice are in need of more evident clarification.

The Treaty of Rome enacted provisions for free movement of people in 1951. That provision ensured the fundamental elements for economic cooperation in single market. In 1985, the Schengen Agreement permitted three-months stay for immigrants within its member states without any restrictions. According to the Schengen Agreement, workers who could live without government assistance can stay longer than three months. The Copenhagen Treaty on European Union (TEU) in 1993 required all EU member states to respect democracy, human rights and the rule of law as core values. The Citizenship Directive of TEU prohibited discriminations of residents based on their nationality within the EU. The TEU declared that all the citizens of the 27 member states have same special rights within the European Union. By TEU, immigrants who were the primary breeders

of children could get residence permits and immigrants who were actively looking for work shouldn't be expelled by government. Expulsion was only allowed in case that the immigrant became a genuine threat for national security not a presumed. Collective expulsion was not allowed even in this case. In all case of expulsion, opportunities for asking protection and right to appeal should be given to all the subjects. In 2004, the European Directive finally implied that 'expulsion' is not allowed in any case in immigration policy for humanitarian reason. It included returning of a person to a country of origin where torture or inhuman treatments were done to the subject.

However, political powers of the EU have maintained silence on immigration issue for a long period. Traditionally, national governments of the EU member states have maintained opposite attitude against Europeanization. While the European Parliament (MEPs) tend to prefer promoting the rights of immigrants, national politics and public attitude toward the newly arrived people are hostile. In the European Union, there is a range of actors who influence on the literature of immigration policies. Normally, organized people are more favorable to immigrants than unorganized public.²³ Popular opinion is typically hostile to immigration however, they are not well organized. Small and well-organized groups are intensely interested in the policy-making development. Organized groups can also effectively show their electoral interest by supporting particular

²³ Gary P. Freeman, *Modes of Immigration Politics in Liberal Democratic States*, University of Texas at Austin

political party. Interest groups, ethnic minorities, trade unions, bureaucracies, local government and private actors are officially support parties that match their requirements. Both of socio-economic issues and cultural and traditional identity are concerned among public. The increasing labor migration and the threat of terrorism made many center-right parties take more radical and populist position. National governments asserted states' sovereignty over the EU common policy. As a consequence, the EU immigration policies were made by 'uploading' rather than 'downloading' in most cases.

There is three points related to how immigration issue is dealing with in European politics. First, the immigration policies are institutionalized both in European level and national level. The issue of citizenship became a debating topic both on the national politics and the EU politics. Cultural demands of the newly arrived minorities provoked a new way of thinking about national identity and culture. Skepticism about state capacity to control massive migration arose among publics. Second, the issue of immigration is being normalized in politics of almost all European countries. There was emergence of far-right parties among numerous Western European countries. Centre-right parties in countries like Germany, the UK and Denmark took restrictive actions. The far-right parties raised immigration issue on the surface to use it for getting more vote in the elections. Third, the idea of multi-ethnic society is closely linked to European politics with the concept of cultural and national identity. There was backlash against migration and multiculturalism in many countries, breaking the traditional dimensions of the left

and right in national politics. The change of mainstream right parties's position on the immigration issue also affected on the immigration policy of the European Union.

5.2. Limitation of Governance of the EU on Immigration and Citizenship Policy

Since the European Union enlarged toward the Eastern Europe, the European Committee started to make plans for immigrants from the Eastern Europe integrating them into the dominant society of the old states. The PHARE program in Eastern Europe was one example of this effort. The European Committee offered financial and social support for ethnic minorities through this program. However, the political atmosphere surrounding immigrants in European Union is complicated.

From institutional point of view, the European Union is operated by three main actors. The first actors are national governments which make the EU system as intergovernmental community. The second actors are transnational elites or bureaucrats of the European Union which try to promote the analysis of integration. The third actors are non-government organizations and business sectors. By the participation of these actors, the European Union made its own political system and constitution to make a European civil society. However, in practical application, the EU legislation has several limitations on enforcement. First, the European Commission confronts strong opposition of powerful member states in implementing unpopular policies related to immigration. The European Commission do not have authority to appeal forceful measures and the member

states require more autonomy in immigration policy. In principle, the immigration policy of member states should go along within European level, however, the immigration policy development still remained on the hand of national government reflecting preferences of member states. In the European Union, the Committee of Permanent Representative (COREPER) ultimately decides EU immigration policy. It required member states to obey common policy and criteria of the EU. Although immigration issue was dealt as a top priority in Seville Summit meeting in 2002, the COREPER is dominated by national civil servants and ministries of interior. As a result, the old member states do respect the normal standard of international authorities including the EU, they still try to maintain bilateral treaties between two nations in immigration policy on the other hand. Second, the European Directives define immigrants in ambiguous way so that national governments make their own criteria in classification of immigrants. The range of threat for national security is also obscure in the Directives so that the legislation is not applied uniformly from country to country. The European Committee emphasizes social justice on immigration issue but the moral obligations are hard to being applied in specific issues in national level. Since local governments and labor unions do not have much interest on the equality of immigrants, as a result, it is hard to measure the degree of discrimination in labor market. Third, although the EU law guarantees that all the member states should be treated equally, there is criticism that the European Commission is influenced more by the old member states. The issue of Roma in France and Italy evidently show the challenges in front of European

Union for equal treatment of European citizens.

6. Conclusion

Contrary to the position of the European Commission, the governments of member states are pursuing different way to conduct restrictive policies on immigration. It seems that the attitude of member states is reflection of people's concern about the uncertainty of border security, social order and national identity derived from immigration. Many extreme-parties emerged in Western and Northern European countries with the support of publics that are hostile to immigrants. While the European Union emphasizes the equal right of European citizens within territories of each member states, national governments exercise more tough and restrictive actions toward immigrants persisting preservation of national culture and identity. This includes more difficult examination for naturalization, discrimination and exclusion policies.

To sum up, contrary to the Commission's attitude, national governments are emphasizing the traditional and cultural identity of nations and prioritize national citizenship to European citizenship. In this sense, it seems clear that there is a tension between European citizenship and national citizenship among the EU member states. The Roma expulsion policies by French and Italian government, the backlash against multiculturalism in Denmark and Sweden are evidences of this tension. This article tried to found out the factors that factors have influence on this tension between national citizenship and European citizenship. This article

assumed that there were three main factors which had influence on this phenomenon. The first one is anti-immigration sentiment that is rampant among citizens in these countries. Anti-gypsyism sentiment in France and Italy, anti-multiculturalism in Denmark and Sweden were referred as to support first assumption. The second factor was the rise of far-right parties in these four countries. The Northern League and Forza Italia in Italy, the National Front led by Le Pen in France, Danish People's Party in Denmark and the Sweden Democrats in Sweden. The third factor was the limitation of governance of EU on immigration and citizenship policy. Despite the European Union has its own political system, the jurisdiction of the institution and clarification of European citizenship are relatively weak than that of national governments. The European Commission does not have authority to appeal forceful measure for law implement so that some powerful member states strongly oppose unpopular policies insisting national sovereignty. Furthermore the European Directive defines immigration in ambiguous way so that national governments make their own criteria in classifying immigrants. Third, although the EU law guarantees that all the member states should be treated equally, there is criticism that the European Commission is influenced by some old member states and geopolitical selectivity are highly affected on the EU policy making process.

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국 문 초 록

유럽연합은 쉥겐조약을 통해 연합 내 노동인력의 자유로운 이동을 허가한 이래로 유럽연합 차원에서의 공통 이민정책을 설립하기 위해 노력을 기울여왔다. 1990년대 이후 이민정책은 유럽정치에 있어 가장 중요한 논제 중 하나로 대두되었고, 유럽연합의 조약에 따르면 이민자들은 유럽시민권을 지니며 이주한 국가의 시민과 동등한 지위의 법적 보호를 받을 수 있다. 그러나 2000년대에 들어 서유럽과 북유럽의 많은 국가들이 국가정체성과 문화를 강조하며 다소 엄격한 이주정책을 시행하는 경향을 나타내기 시작했다. 이러한 경향은 이 국가들에서 극우정당이 득세하고 많은 지지를 얻는 것으로 더욱 표면화되었고, 유럽연합 내에서 유럽시민권과 국가시민권을 둘러싼 갈등을 야기시키는 원인으로 간주되고 있다. 본 연구는 프랑스, 이탈리아, 덴마크, 스웨덴의 사례를 예로 들어 유럽연합의 이민정책과 각 회원국 내 정책 상의 차이점을 분석하고, 유럽연합 내에 존재하는 유럽시민권과 국가시민권 사이의 갈등 및 긴장에 대하여 조명해보고자 한다.

주요어: 유럽연합, 이민정책, 유럽시민권, 국가시민권

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