

**THE INTEGRATION OF MUSLIM MINORITIES: COMPARATIVE ANALYSIS OF
GERMANY AND FRANCE**

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ABSTRACT

The present comparative case study explores the issues of Muslim minorities' integration into German and French societies. Having assessed two approaches to integration – assimilation and multiculturalism, I suggest that cultural pluralism does not necessarily lead to a social marginalization of immigrants. On the contrary, based on the recognition of a diverse ethnic communities and promotion of tolerance, multicultural approach to integration seems to be more successful in maintaining the principles of cultural, religious and lingual equality. The study is based on personal interviews of Turkish and Algerian minorities, who represent the second generation of immigrants, as well as on the analysis of media sources. By analyzing the success/failures of the religious and linguistic integration, the research will identify to what extent the differences in integration models lead to different outcomes.

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CHAPTER I – INTRODUCTION

One of the social consequences of globalization, accompanied by rapid inclusion of countries into the global financial and informational streams is the intensified process of migration movements. Noticeably, migration broadens ethnical and cultural mosaic of European society, in the same time heightening social tensions and ethno-cultural conflicts between various population groups. The failures of integration process have already resulted in negative public attitudes towards Muslim minorities who are often associated with violence and extremism. Moreover, the tragic events of 9/11, violent demonstrations in France, which subsequently spread to neighboring Germany and Belgium, and a rise of Islamophobia poses an enormous challenge to “harmonious” European society. Comparing two European countries, Germany and France, the following research seeks to investigate the possible solutions to the obstacles of successful integration of Muslim minorities. The thesis will focus on Muslim minorities, which emerged as a result of 20th century migration. In the case of Germany, the precise analysis will be given to Turkish minorities, while in the case of France the emphasis would be on Algerian minorities.

The phenomenon of integration became the milestone of the ongoing debate between different scholars and scientists. The *integration* is defined as a process of common ethnic consciousness formation, followed by the adaptation of prevailing cultural values and behavior. It also presupposes “equal participation of individuals and groups in society, for which mutual respect for identity is seen as a necessary condition” (Geddes 2003, 116). Numerous scholars assert that Germany is more successful in implementing various programs to integrate Muslim minorities, whereas their opponents argue that there are too many obstacles for successful integration of Muslims, and the state does not provide enough support to eradicate this occurrence. France, on the contrary, seems to have a softer approach to immigration issues, characterized by

immigrants' assimilation through various social institutes. The Republican Model of integration and simplified naturalization policies allowed immigrants to easily adopt French cultural values, in the same time maintaining their own Islamic principles. Today's reality, however, demonstrates quite different outcomes: French assimilation model was not able to integrate Muslim minorities; on the contrary, it resulted in social tensions, leading to even greater isolation. As national security of European countries is closely tied with religious tolerance, the issue of integration, being one of the most controversial issues in the contemporary European politics requires a different approach and deeper analysis.

1.1 Case Selection

The issues of socio-cultural integration of immigrants remain divisive. While the viability of European democracies is highly depended on the successful regulation of immigrant flows, as well as on the integration policies promoted by European states, the integration politics varies from one country to another, in accordance with its historical peculiarities, economic stability and cultural homogeneity of the society. Generally, the politics of integration pins down to two opposite integration strategies: *assimilation* and *multiculturalism*. Among the EU countries which adopted the multicultural pattern of integration, one could name Scandinavian countries, United Kingdom, Netherlands, Switzerland, while the assimilation model is closely associated with France. The following research focuses on the case study of two countries of immigration, Germany and France. More precisely, it explores the integration of Muslim minorities, the Turkish and Algerian minorities.

There are several reasons for choosing these two Muslim minorities among all others, and having Germany and France as studied countries. Firstly, Turkish minority is the largest Muslim minority in Germany, while Algerians constitute proportionally large Muslim minority in France.

Secondly, it is important for the purpose of research to have countries with different integration patterns. Numerous investigations were made on the governmental policies dealing with immigrants in the countries with similar integration models. This research is important as it offers a different approach to the field of socio-cultural integration, by analyzing the combination of factors that influence the process of immigrants' infusion into the prevailing culture. Mainly, the socio-cultural integration of Muslim minorities is investigated through naturalization policies, language proficiency and religious freedom. Among the minor criteria for choosing these two cases, I would like to mention the differences within the educational systems adopted by the governments, as well as the economic development of both countries.

1.2 General Structure of the MA Thesis

Before getting into the discussion, I would like to outline the structure of my research. The first chapter introduces the theoretical framework for the analysis and the major concepts applicable to the study of minorities' integration. In particular, it conceptualizes the terms *integration*, *assimilation*, and *multiculturalism*, and provides a short overview of the hypothesis and central arguments. By identifying the differences in two approaches, the chapter one also presents the wide range of literature and illustrates the drawbacks of each model. In my second chapter I am dealing with the historical emergence of Muslim minorities in Germany and France. By tracing the history of immigration and remigration policies, I am analyzing the successes and failures of to-date integration. The major goal of this chapter is to list the measures taken by two states to implement the politics of peaceful coexistence, such as the simplification of naturalization policies and simplified access to citizenship. The third chapter concentrates on the relationship between states and Islamic associations. It highlights the differences and similarities between religious institutionalization, access to religious education, and functioning of Islamic

organizations. The issues of xenophobic backlashes and everyday discrimination are also discussed. This is followed by the last section which discusses the linguistic integration of Muslim minorities into the prevailing culture. Exploring the effects of educational policies adopted by individual governments, the analysis suggests that multicultural education should be seen as a primary measure of fighting the social exclusion of Muslim communities. The creation of equal education opportunities for economically vulnerable immigrants would facilitate the integration process, in the same time preventing the emergence of extremist organizations. Finally, I propose certain recommendations to smooth the integration process.

1.3 Research Questions and Hypothesis

The following research will explore the question of why, comparing to *assimilation pattern*, the *multicultural approach* to integration is more successful in integrating Muslim minorities? To answer the central question, the following sub-questions will be analyzed:

- What are the major obstacles of Muslim minorities' integration?
- How do the Islamic associations contribute to the integration of Muslim minorities?
- How successful are the educational policies of two states in integrating Muslim minorities?
- What are the possible solutions to the obstacles of successful integration?

The major argument of the research is that the adoption of a multicultural approach to integration does not necessarily lead to a social marginalization of immigrants. Quite on the contrary, by recognizing the diversified ethnic communities, promoting tolerance and linguistic equality, a state has better chances in implementing the policies of successful integration. Multicultural approach to integration rejects the idea of cultural universalism and assimilation, and discards the existence of a dominant culture; maintaining the principles of cultural, religious, and lingual equality. According to Sabine Schwirner, multiculturalism is described in three

different dimensions. The first dimension characterizes multiculturalism by having the form of cultural heterogeneity. The second dimension measures equality and tolerance towards each other in ethnically divided community. Thirdly it can be described “as a political program against discrimination which is the duty of the government and administration” (2006: 17).

As it was already mentioned, among one of the significant limitations of the following research is the inability to associate Germany with a pure multicultural country. The Federal Republic of Germany has never considered itself as an integrating state; consequently the initial policies of socio-cultural integration were rather temporal. The economic boom of 1950s and a shortage of a labor force required a quick response from the German government. However, neither state administration, nor immigrants themselves perceived the temporal labor-recruitment contracts as a process of immigrants’ inclusion into German society. The industry reconstruction had to be suspended as a result of economic crisis of 1970s, and non-German immigrants were proposed to leave the country. While government was implementing the policies of forcible repatriation, most of the Turkish immigrants decided not to leave the country. Hence, from non-integrating state, Germany transformed into socially-heterogeneous community where immigration was recognized as a most significant challenge for political stability and peaceful coexistence. The immigration politics changed substantially; unwillingness to disintegrate German nation which based on principles of unique ethnic membership, facilitated the implementation of multiculturalism policies.

Until recently, multiculturalism was never considered to be a consistent political program; rather the policies of cultural pluralism were aimed at the preserving of national German identity. The last decades to a large extent changed public perceptions of immigrant communities. The simplification of naturalization policies, intensive contact between Turkish minority and prevailing majority, innovations within the educational system -- all this resulted in positive

attitudes towards ethno-cultural diversity. Organized in July 2006, the first national “Integration Summit” was one of the major steps in formulating the national integration program. As Chancellor Angela Merkel mentioned, the government policies would focus on the social aspect of integration, concentrating on the following “problematic” areas: language courses, the situation of women and girls, educational and vocational training opportunities, as well as on local integration activities (the Federal Chancellor, 2006). Maria Böhmer, the Commissioner of the Federal Government for Migration and Refugees, has argued that German approach to integration stems from the following guiding principle:

Integration cannot be imposed; it is a matter of living. On the one hand, it requires the preparedness of the immigrants to embrace life in our country, to unreservedly accept the constitution, the Basic Law, and all German legislation, and to learn the German language. The hosting society is required to show tolerance, acceptance and the willingness to honestly welcome people who lawfully live in our country. A sense of living together will develop, when people feel at home, when they participate in our society, in both their professional and private lives, and when they experience respect for their achievements (2007:2).

The French *assimilation model*, on the contrary, is aimed at the total dissolution of ethnic minorities in the dominant culture. France is among few European countries that were able to adopt the policies of cultural universalism, and build secular and civic monocultures. The approach promoted the assimilation of minorities into the French ‘melting pot’ and intended to obliterate the lingual and ethnical differences. As Richard Lewis argues, France has established “a readiness to grant citizenship. But it has a republican conception of citizenship which does not allow, at least in theory, anybody of citizens to be differentially identified” (2006: 111). The essential characteristic of the French approach to integration is its indifference to ethnic, linguistic and social distinctions of immigrants.

From the times of Great French Revolution, the belonging to a Nation was closely associated with belonging to a Republic. French citizen is *prima facie* the citizen of the Republic,

an individual who is loyal to republican ideas of *Liberté, Egalité, Fraternité*. At the same time, the loyalty to Republic includes the cultural loyalty, meaning that French citizen cannot differentiate between the democratic values and moral obligations. It is considered to be one of the reasons of why immigrants are expected to be fully integrated into the host society through reinforced acculturation policies. Generally, the integration of immigrants in France, from the very beginning was seen as immigrants' assimilation, rather than cultural co-existence of different societies. In spite of all differences of the integration pattern, these two approaches originate from the very same understanding of national state essence. It is the traditional understanding of democratic governance, as John Mill mentions in one of his writings, cultural homogeneity and democracy go hand-in-hand, "free institutions are next to impossible in a county made up of different nationalities [...] united public opinion is necessary to the working of representative government and impossible if people read and speak different languages" (Glennon 2003: 6).

My initial assumption is that the more the government of the host country emphasizes on the need for multicultural approach to integration, as opposed to assimilation model, the more successful the integration of Muslim minorities is. For the purpose of this analysis, the prospective research will test the hypothesis through the (1) *religious freedom*, to see whether there are substantial differences in Germany and France in terms of the public access to Islamic associations, and their cooperation with national governments; (2) *linguistic integration* along with *educational policies* will be analyzed through language skills, access to vocational training and professional education. The comparison of naturalization policies and access to citizenship will also be made to identify the achievements and major obstacles of integration.

1.4 Literature Review

According to Will Kymlicka (2003) *multiculturalism* is a cultural pluralism or the policy of supporting polyethnicity within the national institutions of the existing cultures in any particular state, wherein the members of a state either belong to or have emigrated from different nations. Applying this theoretical approach into the French and German perspective, someone may denote an obstacle in defining the Turkish and North African *minorities* on whether these minorities are the national minorities, which are “distinct and potentially self-governing societies incorporated into a larger state”, or they are just the ethnic groups or “immigrants who have left their national community to enter another society” (Kymlicka, 2003: 19). For the purpose of this particular research, Muslim minorities are defined as ethnic groups of Turkish and North-African origin that emerged as a result of 20th century migration, and living on the territory of Germany and France respectively.

William Brubaker (1994) enumerates three different traditions of migration and citizenship, as (1) *jus soli* approach, where citizenship is granted automatically to the individual born in the territory; (2) citizenship that is determined on the basis of descent, known as *jus sanguinis* approach; (3) legacy of colonialism, when immigrants can acquire citizenship through registration, naturalization or declaration. Scholar mentions the problematic character of *jus sanguinis* system, as it presupposes that an individual born abroad to citizen parents, without knowing a single word of a language, and without any connection to native society could easily become a citizen, while people to non-citizen parents despite of their continuous residence would not be able to acquire citizenship.

Castles and Davidson identify numerous factors of successful integration, including legal, economic, political, social, and cultural. Among *economic factors* authors determine the ability

of minority groups to perform well economically, in order to maintain an equal participation in social life of a particular society. Low-skilled immigrants who receive a low paid job and are not able to afford neither vocational training nor language courses, inhibiting the integration process. *Spatial* and *social factors* also appear as important obstacles. Welfare dependency of immigrants and rapid development of poor minority neighborhoods resulted in social exclusion and blatant discrimination. Cultural differences in traditions between different ethnic groups could also intensify social tensions and lead to even higher discrimination, yet for skilled immigrants individual integration seems to be easier, since they are not subject to “labor market segmentation and residential segregation” (2000: 79). While the following research is not rejecting the importance of legal and political factors of successful integration, the major attention is given to the socio-cultural factors, which play the significant role in understanding the process of minorities’ integration. By socio-cultural factors I mean the access to education and religious freedom. To scrutinize the integration process in Germany and France it is equally important to understand the emergence of Muslim minorities, and naturalization policies adopted by two states.

1.5 Methodology and Limitations of the Research

The investigation of the proposed research topic demands the comprehensive analysis of a primary and secondary literature sources and examination of theoretical approaches. The thesis employs the qualitative method, based on comparative case-study analysis. The unstructured interviews with the representatives of Turkish and Algerian Muslim minorities, who represent the reliable members of the studied communities, constitute the sufficient part this research. The interviews were conducted via e-mail, the interviewees were chosen on the basis of their origin, socio-economic status, and age. The contribution of statistical resources should also be

mentioned. The case studies are based on the statistical reports of OECD database (Organization for Economic Co-operation and Development) on educational statistics.

The limitations of the research include the differences between the studied cases. First, Muslim minority in Germany is not the product of the same Islamic socialization as Algerian minority is. Moreover, there are substantial differences in the relationship between integrating state and country of origin. In contrast to historically positive relationship between Germany and Turkey, Algeria has a history of Islamist-based violent conflict against French. There is a gap in statistical data for 'education' variable used in this research. Moreover, the OECD database does not include the statistics on illegal immigrants. Another methodological problem is the ambiguity of the concept 'integration', as it includes social, cultural, and political embeddedness into the prevailing culture. It would be a challenge to analyze the integration of Muslim minorities in Germany and France, since the concept of 'Muslim minority' includes the Algerian and Turkish minorities, with the migrant background only. By analyzing the success/failures of religious and linguistic integration, the research will identify to what extent the differences in integration models led to different outcomes.

CHAPTER II – CULTURAL DIVERSITY WITHIN SOCIETIES: COMPARING TWO INTEGRATION MODELS

2.1 The Emergence of Turkish “Guestworkers” in Germany and Algerian minority in France

Located in the heart of Europe and known as “Mecca of the religious tolerance”, Germany, with the population of 82.4 million, became the home for nearly 3.5 million Muslims, three-quarters of which are immigrants from Turkey and their descendants (International Crisis Group, 2007: 1). The Turks represent the majority of Muslims in Germany. Germany has a hybrid constitution, which allows semi-secularism, and the religion plays an important role in the society. In fact, the religious studies are included in the educational curriculum, and Islam related issues are widely and freely discussed in Germany.

During the economic crisis in the early 1970s the German market was unable to provide enough labor power to boost the economy; and German government has proposed a new project, which was designed to lead the country out of the crisis period. Henceforth, the bilateral agreement of 1961 became a solid foundation for the seasonal labor employment program to support the economy’s need for low-skilled workers, and by the early 1980s the population of the Turkish migrants was nearly 1.5 million people (ICG 2007: 4). Indeed, the state has expected these “gastarbaiters” to return to their homelands after the work season, and it has even proposed the financial assistance. Nevertheless, most of the workers decided to stay in Germany, even though this occasion has meant for most of them the deprivation of their constitutional and human rights. Several decades later due to the family reunifications, births and marriages, the social structure of the Muslim community has changed, and by the end of the 1990s the Turkish population in Germany was nearly 2,2 million people, whereas 800.000 of them were children of school age (ICG 2007: 4). However, rejected by the majority of the host population, migrants and

their families were seeking for patterns of their own identity, and the religion, Islam in particular, became a solid foundation for the evolvement of their individuality.

Unlike Germany, where nationality laws relied on *jus sanguinis* principle, France was incorporating immigrant from the former colonies, so the larger number of immigrants immediately became nationals (Feldblum, 1999). According to the Ministry of Interior statistics, the number of immigrants rose from 1.5 million in 1960s to 4.2 million by the end of 1970s, among which 846.000 were Algerians, 270.000 Moroccan population, 150.000 Tunisian population (Silverman, 1992). The politics of French administration towards the mass immigration movements of 1970s was rather inconsistent. From one side, government supported family reunifications and created favorable conditions for further provision of necessary facilities, such as dormitory accommodation, language courses, welfare assistance, etc. On the other hand, the immigration policies and regulations towards North-African migrants have toughened, and French government even attempted to forcibly expel the Muslim immigrants from the country. As a result, the number of illegal immigrants has increased which worsened socio-political situation in the country, fostering Islamic extremism and criminality.

The French assimilation model, on the contrary, faces numerous obstacles and failures. The approach to citizenship is based on *jus soli* tradition, which presupposes that immigrants who acquire citizenship possess equal rights and responsibilities as native population. Reality, however, demonstrates quite different outcomes. In spite of their formally declared equality, immigrants are not able to equally incorporate into French society. The poverty, blatant discrimination and peripheral employment positions reflect the marginal status of immigrants. Moreover, practice suggests that Muslim minorities very often become the victims of violent racist attacks, regardless of their formal citizenship status. Numerous obstacles to social integration impel immigrants to form their own ethnic communities, where their own culture

values, mentality and language are reinforced, making Muslim minorities even more isolated from the French society.

If the labor migration of 1960s had positive effects on the economic growth and industrialization, abundant family reunifications, and illegal immigration have resulted in considerable government spending, political and religious difficulties, sharpening the problem of public security. All these issues result in serious contradiction with principles and traditions of French culture. Inefficiency of governmental regulations and integration mechanisms, compel French government to toughen the immigration policies and strictly limit the immigration flows, yet, the problem of labor migration is still pending. The demographic situation in France, its economic instability and bankruptcy of traditional systems after World War II also required the mass inflow of immigrants. Gerard Noiriel (1996) in one of his books examines immigration and citizenship policies in France, determining mass immigration as one of the important factors in explaining modern industrialization. The inflow of migrants from neighboring countries, Italy, Portugal, Spain and their further social integration occurred very rapidly, as most of the immigrants shared the same religious beliefs and cultural lifestyle. The integration of North-African Muslim migrants was rather complex, as it required cultural assimilation of a different culture, religion, and mentality. The low level of education and welfare dependency of immigrants inhibited the integration process, and resulted in social exclusion from prevailing culture. Nevertheless, economic expansion and reconstruction provoked numerous bilateral agreements, giving boost to migration flows.

2.2 Countries of Successful Integration?

Various analytics assert that the German state promotes the policies of successful integration of Turkish migrants into the German society. In the early 1970s, Germany has invited

thousands and thousands of workers, mostly from Turkey, to be legally employed and to work for their own sake and for the sake of the German state. After the employment period “the guest workers” decided not to leave the country; however, the German state did not execute any substantial force to find and return these migrants to their countries. Moreover, these foreigners were allowed to create civil society associations and join political parties and trade unions. Furthermore, the family reunification program permitted the migrants to reunite with their families in Germany, and “the 2000 law granted citizenship to children born in Germany to non-German parents if at least one parent has been a legal resident for more than five years” (ICG, 2007: 5).

Moreover, it has been affirmed that the naturalization procedures for the migrants who do not share the European heritage have been relatively simplified, and these procedures are widely practiced in most of the developed countries. The applicants for the German citizenship have to pass the tests for the German language proficiency, and they are still checked by *Verfassungsschutz*, the entity, which monitors the naturalization procedures. Moreover, on May 2006, the national conference of interior ministers lowered the minimum residence threshold from eight to six years and proposed that the national citizenship tests will not be held, because the authorities may review candidate’s civic knowledge in other ways, such as with a role-playing exercise (ICG 2007: 6).

Notably, education is another important aspect to focus, discussing the multiculturalism and integration issues. During the last decade theologians and Islamism specialists have been added to the interior office; the federal *Verfassungsschutz* has hired more than a dozen academic specialists with PhDs, and the foreign ministry has started a program “*Dialogue with the Islamic World*” (ICG, 2007: 20). Moreover, a large number of independent, mosque-related Qu’ran schools have been established in Germany to give religious education to Turkish citizens

(Sander, Larsson, & Kos-Dienes, 2000: 20). Another important indicator of the German effective integration program is the low level of the radical and violent attitudes among Muslims. The Islamists and other radical organizations are not supported by the vast majority of the Muslim population. Comparing with the neighboring France, Germany is a very stable multicultural country, which tolerates Muslim minorities and at the same time rigorously monitors violent tendencies in the society.

2.2.1 Immigration and remigration policies

Along with other European states, the Federal Republic of Germany is facing numerous immigration obstacles. The economic demands for a low-skilled labor, as well as demographic issues require the implementation of new immigration policies, while adherence to national and cultural principles impedes the integration process. Taking into the consideration the ambiguity of present-day macroeconomic and social situation, the demographic problem appears to be the most important. Likewise, the immigration restrictions could be explained by historical reasoning -- the federation emerged as a union of separated Landers, and immigrants possess the fundamental threat not only to the territorial unity of German state, but also to national identity. The immigration policies could also be characterized by several specific considerations. Until the end of the twentieth century, German government was rejecting the idea of an “integrating state”. On the legislative level, no legal laws and provisions were adopted with regards to immigration policies. The concept of “integration: was usually replaced by the term “repatriation”.

In the end of 1970s, German government was facing the conflict between political framework and everyday administrative practice: officially rejected integration on the national level contradicted to the institutionalized regional migration. Development of the internal market also required the structural reconstruction of economic sectors, where the need for cheap labor

went beyond state's immigration policies. Each of these positions had its own requirements and proposed limitation on the current immigration policies. In accordance with *jus sanguineus* principle, citizenship is acquired through ethnical membership. By the end of 1980s the German government facilitated the process of resettlement of ethnic Germans. While citizenship was granted automatically, German immigrants experienced social differentiation between "pure" Germans, and Germans with Russian, Jewish, Polish background. Yet, these differences did not affect immigrants' position in German society. The non-citizens are generally the immigrant groups who resettled to Germany on the basis of 1970s labor migration. Declaring itself as a non-integrating country and for a long time maintaining the principles of "quiet segregation", German government refused to assign both citizenship and long-term residence permits. On the other hand, the immigrants themselves did not possess the uncontested demand for applying to German citizenship. Moral values and adherence to cultural traditions, as well as the financial and organizational obstacles of naturalization procedures resulted in so called "social vacuum", that required urgent state intervention.

France traditionally maintained the politics of assimilation, rejecting any forms of cultural or linguistic differentiation within the society. The specificity of naturalization policies could be explained by French approach to assimilation of Muslim minorities: citizenship policies are examined not as an objective, but rather as means to integration. French citizens born outside the country are considered to be the full-fledged members of French community and are able to exercise their civil rights *pari passu* French citizens living on the territory of France. The residents of former French colonies hold the simplified access to naturalization procedures. In contrast to United Kingdom, USA, and Netherlands, France disputes the politics of affirmative action (rendering special rights and guarantees to national minorities, who have been oppressed as a result of historical occurrences), considering such politics to be a threat to national unity.

From the other side, however, French government implemented the very smooth immigration politics. In 1981, the president of the socialist government Francois Mitterrand proposed the reconsideration of existing immigration policies, offering the work permits to all French immigrants, including the undocumented. According to new immigration policies, immigrant who entered the country before January 1, 1981 were eligible for a three-month working permits, giving more time to local authorities to provide immigrants with a permanent residence status (Cornelius 2004: 192). The conditional amnesty period, relaxed sanctions to employers who employed illegal immigrants and extension of a working permits, allowed the country to suspend the large outflows of illegal immigrants, at the same time facilitating the integration process.

One of the major problems with regards to immigration policies concerns the undocumented immigration. According to Kimberley Hamilton (2004), the Pasqua legislation proposed by French politician Charles Pasqua, called for “zero illegal immigration”, restricted the naturalization policies and promoted the repatriation of illegal immigrants. The legislative changes have also increased the waiting period for employment opportunities and family reunification. In 1995-1997 France was facing a continuous decline in citizenship applications: 69.300 applications in 1994, 56.700 in 1995 and 55.600 in 1996. Still French administration is not able to eliminate the issues of illegal immigration. The complexity lies in simple impossibility to identify the immigrants, since most of the undocumented residents conceal their status and legal documents. Moreover, certain countries refuse to cooperate when it comes to the issue of immigrants’ repatriation.

The migration amnesties are seen as one of the solutions to the problem of illegal immigration. The first major amnesty was implemented in 1982, however the government of Francois Mitterrand highly supported the integration of immigrants into the French society, even by the means of assimilation undocumented residents. The second amnesty was initiated by

illegal immigrants themselves; by the end of 1998 numerous street demonstrations highly supported by French human rights movements, resulted in 152.000 legalization of residence permits for illegal immigrants (Casciani, 2006). Reuters UK reports that no massive amnesties will be offered to undocumented immigrants in the near future. Numerous business companies oppose the idea of restrictive immigration policies as it would influence the development of French economy. Hotel and restaurant industries are highly depended on the low-skilled immigrants, who in most of the cases do not hold any legal documentation for a residence permit. Still, the National Front rejects the idea of massive amnesty, arguing that it is the only way to stop the flow of illegal immigration (Reuters UK 2008).

2.2.2 Naturalization policies

The Federal Republic of Germany is based on the ethnical conception of nation, according to which the citizenship is granted on the basis of “*Blutsverwandtschaft*” (ethnic identity by the blood). Until recently, the problems of citizenship acquisition have been among most debated issues. While in France and in other European countries, the third generation of immigrants residing in the country is granted the citizenship, immigrants in Germany are still identified as “foreigners”. The naturalization process appears to be very restrictive even for permanent residents. In order to receive a German citizenship, individual must reside on German territory for a period of eight years, be able to demonstrate the intermediate level of language skills, has to prove his/her financial stability, demonstrate loyalty to democratic principles and renounce the current citizenship.

One of the factors that influence the naturalization policies in Germany is the significant regional independence of Landers. Thus for instance by the end of 1990s, Land authorities in Bavaria were granting citizenship to one third of 1% of the foreigners living in the region, while

in Berlin it was three times higher, about 0, 98%; the naturalization fees were also defined in accordance with regional peculiarities (Nathans, 2004). The repatriation policies of 1980s and restrictive access to citizenship decreased immigrants' opportunities and provoked the opposition from various political parties. As a result, naturalization policies were significantly liberalized, and the number of citizens with Turkish origin increased dramatically. For just several years, the number of naturalized Turkish immigrants increased from 1,713 in 1989 to 19, 590 in 1994 (see table 1). Although the new law decreased the minimum residence time from fifteen years to eight years, the general criteria for receiving the citizenship became much more restrictive.

According to the chapter VII of the Alien Act (*Ausländergesetz*) of 2000 a foreigner legally residing in the country for a period of eight years, can be able to acquire the citizenship if he “posses the commitment to the free democratic order of the Basic Law”, can support himself financially “without claiming for social security or unemployment benefits”, gives up his previous citizenship, and “has not been convicted of a criminal offence” (Aliens Act Extracts 1990: 1354). Eli Nathans (2004) describes the pick of naturalization in 1999, as a result of changes in citizenship requirements, proposed by the 2000 law. The new conditions imposed on Turkish immigrants, for example the financial stability and intermediate language skills caused the drastic spike in naturalization applications.

Table 1 Naturalization of Turkish Citizens in the Federal Republic of Germany, 1982-2002

<i>Year</i>	<i>Turkish citizens naturalized in the Federal Republic of Germany</i>	<i>Turkish citizens in the Federal Republic of Germany</i>	<i>Year</i>	<i>Turkish citizens naturalized in the Federal Republic of Germany</i>	<i>Turkish citizens in the Federal Republic of Germany</i>
1982	580	1,580,700	1993	12,915	1,918,400
1983	853	1,552,300	1994	19,590	1,965,600
1984	1,053	1,425,800	1995	31,578	2,014,300
1985	1,310	1,401,900	1996	46,294	2,049,100
1986	1,492	1,434,300	1997	42,240	2,107,400
1987	1,184	1,481,400	1998	59,664	2,110,200
1988	1,243	1,523,700	1999	103,900	2,053,600

1989	1,713	1,612,600	2000	82,861	1,998,500
1990	2,034	1,675,900	2001	76,573	1,947,900
1991	3,529	1,779,600	2002	64,631	1,912,200
1992	7,377	1,854,900			

Source: Eli Nathans. The politics of citizenship in Germany: ethnicity, utility and nationalism. 2004. p. 250

The immigration policies of France varied differently from one historical period to another. While in 1960s French administration highly encouraged immigration, by providing numerous job placements and introducing the model of complete assimilation, the continuous illegal immigration, as well as the unstoppable demands for social welfare resulted in dissatisfaction from prevailing population, therefore French government had to implement the policies of repatriation of illegal immigrants. James Patrick in his book *Immigration the World Over: statutes, policies, and practices* mentions that there are three different ways of receiving the French citizenship. Children born of either French or foreign parents on the territory of France are automatically given French citizenship upon reaching the age of eighteen. The second option is available to residents of the former French colonies, or foreigners who married the French citizen. In this case the procedure of gaining the citizenship is relatively simplified, foreigner who requested the citizenship should be able to demonstrate the knowledge of French history, and prove his/her language skills. The third way of receiving the citizenship is by decree, meaning that could apply for citizenship after residing on the territory of France for five or more years (2003: 153-154).

In contrast to Germany, French naturalization policies are much more simplified. The integration model presupposes rapid assimilation into French culture not only socially, but also on the legal grounds by providing the relatively “unproblematic” access to citizenship. The simplified naturalization policies are constantly changes, the representative of Algerian minority, a twenty eight year-old Accounting Manager at European Fund Administration has mentioned explicitly:

In the 1980's, the naturalization policies were much more simplified, and the reason for this is the demand for cheap labor-skills. After working a certain number of years in the country, it was quite easy to benefit from naturalization. Now, it is quite impossible to become French. Even if you marry a French man or woman, you must stay married for a long time, therefore the number of naturalization applications nowadays is relatively low comparing to the past (interviewee 1).

Noticeably, the naturalization policies can foster the process of successful integration, providing immigrants with more opportunities, yet it can also lead to the opposite direction. Since the implementation of the Schengen Agreement European countries are no longer the representatives of individual national interests, the naturalization policies in one country can certainly affect the immigration flows of another, not taking into the consideration the outcomes of illegal immigration. Can naturalization policies be a determining factor of successful integration? If to take a closer look at French naturalization policies, one could conclude that North-African immigrants can easily receive the citizenship on the basis of “residents from the former colonies” status, however French citizenship *per se* does not provide the equal treatment, tolerance and equality of opportunities both on the labor market and in social life. Algerian minority in France is facing the very same issues of everyday discrimination and social isolation, just as Turkish minority in Germany, therefore the simplification of naturalization policies should not be perceived as the only measure of successful integration.

2.3 The Greatest Failure?

Nevertheless, the integration processes in both countries are not ideal. Numerous scholars allege that Germany and France face many obstacles in the sphere of integration, and several positive results in this area do not necessarily reflect the reality. There are several factors, which significantly affect the process of successful integration. First of all, the German officials assert that Germany has never been an integration state. The German administration and the developers

of the economic recruitment program assumed that this job program was a seasonal and temporary occurrence. Rita Suessmuth, the former head of the federal immigration committee, explicitly states that “Integration was never the goal. The idea was that the immigrants would return home” (Spiegel Online, 2004). However, the migrants have stayed in the country, and nowadays numerous Turkish minorities are still deprived of their constitutional rights, and for years they have been unable to acquire citizenship because of the German naturalization policies and the weakness of the national and international legislature. As Kymlicka (2003) argues, Turkish minorities who have continuously lived on the territory of Germany and who have adopted cultural values cannot acquire German citizenship, as the inclusion into German society is based on descent and culture. Even though when the naturalization policies were simplified, the naturalization barriers still took place. The 2000 law has excluded millions of residents born before 2000; the language proficiency courses and loyalty tests also decrease the number of the potential citizens (ICG, 2007). The lack of the double citizenship puts some Turkish minorities into the vacuum situation, whereas they cannot acquire German citizenship and can lose the Turkish one.

The French approach to citizenship is a different one, as it is based on *jus soli* tradition; moreover the legacy of colonialism also plays an important role in alleviating the integration process. According to French model, migrants who acquire citizenship possess equal rights and responsibilities as native population. Reality, however, demonstrates quite different outcomes. In spite of their formally declared equality, immigrants are not able to equally incorporate into French society. The poverty, blatant discrimination and peripheral employment positions reflect the marginal status of immigrants. Moreover, practice suggests that immigrants very often become victims of violent racist attacks, regardless of their formal citizenship status. Numerous obstacles to social integration impel immigrants to form their own ethnic communities, where

their own culture values, mentality and language are reinforced, making minorities even more isolated from the French society.

The education sphere is also a very controversial issue nowadays. Even though there are several schools opening all over the Germany, in most of them the courses are taught in Turkish, and this occasion, on contrary, hinders Turkish integration. Furthermore, many invited imams as well as their subordinates do not speak German; their language proficiency is extremely low, and very often they have never been in Europe, they do not share European culture and do not understand the norms of European living. In addition, the status of Islam in the curriculum, or more specifically, the religious education of Muslim children is not legally codified (Sander, Larsson 2000: 21). As a result, the language proficiency of many Turks is still relatively low.

Another significant complication to the successful integration of Turks is the federal structure of the government. The analytics of the ICG conclude that “the national government is constrained on integration issues by the extent to which policy on education, naturalization and religion is made” at the Lander or provincial level (2007: 2). The Lander representatives do not directly deal with this sensitive issue, and they obligate the local judicial and executive systems to resolve the issues concerning the interests of minorities. However, these issues often do not find support not just at the provincial level, some of the minority related bills and laws are not approved by the German Upper House either. This occurrence also hinders the overall process of Turkish integration.

According to the Goteburg research, Turkish Muslims have higher unemployment rate than other immigrants of comparable education and work experience, and this phenomenon is noted even among the well-respected professions such as medicine, engineering and teaching (2000: 22). The issue of discrimination and stereotyping becomes a serious problem shifting the focus from the social scale to the economic. Another complication arises from the Germany’s careful

“balancing of free speech and democratic order” (ICG, 2007: 3). The state is very vigilant and selective in dealing with this sensitive issue, especially after the experience with the Nazis nationalist ideology. Therefore, the state actively monitors the Muslim activity in Germany and precisely explores the cases related to Islam.

In French case, in spite of the numerous successes, the integration of African migrants also became highly problematic. Being isolated from French community due to insufficient financial opportunities, low level of education, and diverse culture, immigrants formed their own subculture, which sometimes was even hostile towards majority culture. Moreover, areas populated by ethnic minorities are having their own distinctive features: female discrimination, family violence, arranged marriages and bridenapping, system of clan politics, and corruption issues, among other negative consequences of such isolation are the development of illegal business and drug trafficking. All these issues result in serious contradiction with principles and traditions of French culture. Inefficiency of governmental regulations and integration mechanisms, compel French government to toughen the immigration policies and strictly limit the immigration flows, yet, the problem of labor migration is still pending.

The problem of immigration is examined together with the issue of national identity perpetuation. As in numerous European countries, candidates are expected to know the history, traditions and language to be able to receive the citizenship. One of the solutions to the labor migration could be the creation of immigrants’ quota. In this case, mass immigration would suspend the increase in wages for local population, keep economic development and high industrialization, however would not be able to solve the problem of illegal immigration. The overall socio-economic situation in the country becomes incredibly difficult; French government supports immigrants financially by providing different allowances, in the same time putting the pressure on the shoulders of French taxpayers.

Moving to the religious issues, among the important indicators of the German effective integration program, one could definitely mention the low level of the radical and violent attitudes among Muslims. The Islamists and other radical organizations are not supported by the vast majority of the Muslim population. Comparing with the neighboring France, Germany is a very stable multicultural country, which tolerates Muslim minorities and at the same time rigorously monitors violent tendencies in the society. One could probably recall civil unrests in France in November 2005 that subsequently spread on neighboring Belgium and Germany. While mass media was highly propagandizing socio-economic reasons as a major cause of conflict, it became obvious, that religious factor played the most important role. Islam plays a significant ideological role for Muslim minorities; it smoothes religious contradictions, yet when necessary it could easily transform the confrontation into rivalry of religious values. The influence of Islam as an independent ideological force intensifies especially during crises. Interestingly enough, just as Islam could consolidate various protest attitudes, the islamophobia gains numerous supporters as well. The leader of the far rights, Jean Mary le Pen has already called for deprivation of citizenship and mass deportation of immigrants who do not share traditional French values.

CHAPTER III – ASSESSING THE SUCCESS OF INTEGRATION MODELS IN GERMANY AND FRANCE

3.1 From Secularism to Integration: the Relationship between Islamic Associations and State

The question of religious institutionalization has always been among the most heated ones. Since Islam does not have the central regulative agency, the government of France for many years was trying to establish its organized structures. If to compare two Muslim communities in Germany and France, one could conclude that France is much more liberal in accommodating the demands of Muslim communities, and controlling the internal dynamics of Muslim immigrants. The explicit presence of Islam in France in the forms of different Islamic associations is a relatively recent phenomenon, typical only for the last several decades. Such changes occurred not only as a result of increasing immigration flows, but rather due to the internal changes of Muslim communities.

A closer look at Muslim minorities suggests that immigrants of the first generation distanced themselves from their strict adherence to Islamic principles mainly because of the dynamic changes of socio-cultural environment. Noteworthy, French employers initiated the establishment of worship houses on their factories, while the French government arranged certain practical measures to integrate Muslim communities, thus numerous imams were invited to preach the Islam, the first large Muslim cemeteries were established, and more local hospitals were creating the houses of worship for immigrants. Among the most important developments of that time, was the opening of the Grand Paris Mosque in 1926 that was initiated and sponsored by the French government in the memories of Muslim soldiers who died in the First World War. The mosque was planned to serve as an organized Islamic institution, the creation of which indicated the high level of openness and tolerance towards immigrant communities, yet besides its “diplomatic” functions the mosque of Paris was set to satisfy religious demands of French

Muslims. Unfortunately, the mosque was not able to maintain its principle functions, numerous Muslims were not allowed to even enter the building due to their poor economic situation. Paradoxically, for a long time the Grand mosque of Paris remained the “advertising mosque” serving the demands of French colonialism.

During the 1950s the number of Islamic associations did not change significantly. The revival of Islam started in the beginning of 1960s with the establishment of the *Union of Muslim Algerian Students (Union Générale des Étudiants Musulmans Algériens- UGEMA)*, grouping together religious students with Algerian origin. In 1963, the Pakistani professor Muhammad Hammidulah establishes the *Association of Islamic Students (Union islamique des étudiants de France - AEIF)*, which was aimed at the unification of foreign students of different ethnic origins (Modood, 1997: 114-116). Nevertheless, the social mobilization in the forms of Islamic associations was only taken a form of initial development. In 1970s, Islam as a religion could not transform itself into visible element of national religions, while the majority of Muslims residing in France did not express any significant yearning towards religious self-assertion. For North-African immigrants, one of the reasons was the temporariness of the residence and the opportunity to return to their home countries, while French Muslims rejected the idea of French Islam, forecasting the successful integration of Muslim minorities into the French society. Moreover, the ideological factors have also played a great role in slowing down the process of Islamic consolidation.

The economic recession of 1973 combined with the rapid decrease of production and increased unemployment, enforced French government to restrict the immigration flows from North-African countries. This decision however, resulted in numerous unforeseen consequences vital for the future development of Islam. The number of immigrants increased significantly, mainly as a result of family unification and illegal immigration. While French immigration

policies were failing, the social ties between immigrants of the Muslim faith were increasing dramatically. Within a few years, Muslim immigration became a widespread phenomenon, leading to communities' demands for religious education, social security, healthcare, etc. To a certain extent, the tightened rules against the immigration served as provocative factors of Islamic socialization, making Islam to be the important part of socio-cultural and political life of a French society. The process of transformation of immigrant groups with similar past into the Muslim communities, with shared beliefs and traditions, completely erased the differences between minorities in terms of their country of origin and social status making Islamic communities more consolidated. The generous financial assistance from other Islamic countries including Saudi Arabia, Algeria and Libya, facilitated the process of construction of mosques, and Islam penetration into different social spheres, making Islam more "visible". The problem of Islamic socialization became the milestone for ongoing debates between intellectuals, politicians, and French ordinary citizens. Failing to recognize the cultural differences, Muslim communities were often associated with Islamic radicalism, which possesses a visible threat to harmonious French society. Anti-Islamic prejudices were mainly propagandized by right-wing politicians, while local authorities and municipalities had to maneuver between the demands of Muslim communities and their own electorate.

Modood Tariq identifies several major Islamic associations that compete for a "unified Islamic representation" in France:

- *National Federation of French Muslims (FNMF)* registered in 1985 with ties to the Muslim brotherhood, coordinates the actions of 141 associations.
- *Union of Islamic Organizations in France (UOIF)* founded in 1983, grouping together almost 150 Islamic associations.

- *Federation of Islamic Association of Africa (FAIACA)* was established specifically to represent the interests of African minorities in France

(1997: 116).

Among other founded organizations functioning today one could name the French Council of the Muslim Faith (CFCM), which was established in May of 2003 with the purpose of representing Muslims on the national level. Given the role of a mediator, CFCM promotes Islamic interests in the country, at the same time serving as a monitoring agency to a certain extent controlled by French government. Nicolas Sarkozy was among the few French politicians associated so closely with religious communities; as Jonathan Laurance, assistant professor of political science at Boston University has mentioned, Sarkozy has always been enthusiastic about the acknowledgement of the Muslim community, he believed that “faith in the power of religion would improve people for the better” (Simon, 2008). Being a Minister of the Interior, Sarkozy highly supported the establishment of CFCM and supervised its first elections on April 13, 2003 by appointing sixteen-member executive board of the CFCM, as well as appointing its president, Dalil Boubakeur (Fernando, 2005).

The recognition of Islam and its inclusion into French society has been characterized by numerous obstacles and continuous failures. Among the most heated questions one could mention the headscarf issue, when young women of Muslim Faith were prohibited to wear headscarves in public schools with the purpose of maintaining the religious freedom. The issue provoked numerous debates and contradictions: from one side government demanded a legitimate separation between state and religion, dictated by French tradition of secularism, from another side the ban of headscarves in public schools was perceived by many Muslims as a threat to cultural norms and Islamic principles. Supporters of the law were rejecting its discriminatory character, highlighting the necessity of limiting visible religious symbols in public institutions,

therefore the proposed law was not only banning the Islamic *hijabs*, but also Jewish Stars of David and Christian Crosses (Watson, 2003). In 2004, with the unanimous support of French Parliament, the law “against the veil” was passed. In accordance with the Article 141-5-1 № 2004-228 of the National Code of Education, the law posits:

In public elementary schools, middle schools, and high schools, it is forbidden to wear symbols or clothes through which students conspicuously display their religious affiliation. Internal rules require that a dialogue with the student precede the enforcement of any disciplinary procedure (Reichert, 2006: 113).

In contrast to France, the politics of contemporary Germany on religious institutionalization has been incredibly strict. Although religious freedom is guaranteed by the article 4 of German Constitution, which declares that “freedom of faith and of conscience, and freedom of creed religious or ideological, are inviolable; the undisturbed practice of religion is guaranteed” most of the Islamic organizations are being under the constant control of German monitoring agencies, including the Office for the Protection of the Constitution (Kommers, 1997: 443). The government of the Federal Republic of Germany characterizes such measures as a necessity to protect the country from Islamic fundamentalism, aiming at the establishment of Islamic state on the territory of Germany. Among the most leading Islamic organizations in Germany, Peter Heine and Aslam Syed mention:

- *Islamic Council for the Federal Republic of Germany* founded in 1986 with more than 30 Islamic associations, dominated by Milli Gorus, a religious community associated with radical Islam
- *Central Council of Muslim People in Germany (ZMD)* established in 1994 and modeled on the example of Central Council of Jews.

- *Turkish Islamic Union for Religious Affairs (DITIB/Diyanet Isleri Turk-Islam Birliği)* founded in 1984, which currently includes more than 776 member associations.
- *Association of Islamic Cultural Centres (VIKZ)* established from 1980s as a mediator between Turkish communities and German government, it has currently been accused of propagandizing Islamic fundamentalism in schools and mosques.

(2005: 284-296).

The German government has used the DITIB as the mediator or the link between the state and Muslim minorities. Throughout the years the DITIB has acquired much support from the German government, and in July 2006 at Chancellor Merkel's Integration Summit the DITIB was the lone representative of Germany's Muslims in recognition of its role and as a prelude to its promotion to become the main and only dialogue partner for the government on Muslims' religious affairs (ICG, 2007: 8). Indeed, DITIB resolves various organizational problems, brings trained imams to Germany, assists them in getting visas, deals with the educational issues, etc. Thus, this organization attempts to support Turkish Muslims in Germany, instilling "love of fatherland, flag and religion" (ICG, 2007: 7). There are also substantial problems with the role of the DITIB. This organization is the extension of the Turkish state, and it often protects the interests of the Turkish minorities only. Noticeably, the Turkish community represents the majority of Muslims, but it is not the absolute majority. The German Muslims are not the Turks only – these segments are from the different countries and ethnic groups, and some of them are also Shiites and Alevis. Consequently, the DITIB promotes peaceful multicultural coexistence, however, with the limited target group.

3.1.2 Religious Education in Public Schools

“Over the next few years Islamic religious instruction in the German language is to be introduced at public schools in Germany” – reports The Goethe-Institute on May 2008 (Thomas, 2008). The formation of Muslim communities in Germany provoked numerous debates on current educational policies, demanding fundamental changes within the school system and accommodation of religious classes into the school curriculum. While supporters of religious instruction claim that the multicultural country should be able to respect religious freedom of minorities and introduce religious classes on the basis of voluntary attendance, the vast majority of German population remains quite skeptical. In order to understand the complexity of the problem, as well as differences in religious accommodation in Germany and France, it is important to scrutinize the relationship between Church and the State.

The relationship between church and the state in Germany differs significantly from French secular policies. Being separated on the legal basis from one side, and historically connected to religious confessions from another, the church still plays an important role in German politics. All church communities officially recognized by public law, including Jewish, Catholic, Protestant and Muslim communes have a right to participate in the process of religious enlightenment, by offering religious lessons in public schools; this right however, is subject to governmental approval on the Lander level. The Article 7 of German Constitution guarantees religious instruction in public schools as a part of school curriculum, and secures the right to abstain from religious instruction in accordance with the “tenets of the religious communities” (Helplinelaw, 2003). It is important to mention that religious instruction has to correspond to religious principles of a particular confession, and it is up to parents to decide whether their children should attend the religious lessons or not. The Article 2 of the European Convention on Human Rights declares:

No person shall be denied the right to education. In the exercise of any functions which it assumes in relation to education and to teaching, the State shall respect the right of parents to ensure such education and teaching in conformity with their own religious and philosophical convictions.

(Public Domain Information System, 2005).

Serving as a compound part of educational system, the classes on religion are often subordinated to strict governmental supervision. While the financial burden for religious education is laid upon the German government, Islamic associations provide a spiritual and linguistic support by offering imams for teaching the religion classes. The process of implementing the religious instruction in public schools is challenged not only by a low educational level of imams and linguistic difficulties, historical adherence to communist ideology which was the only religious ideology at that time, also decelerates the process of Islam integration especially in the Eastern parts of Germany. Since the Federal Republic of Germany is compounded of sixteen Landers with their own legislative policies and government, the education system is not regulated on the federal level; rather each Lander is responsible for its own regulation of the school system (Horner, Kopp, Mitter, 2007: 336).

Another problem concerns the ethics classes in German schools, mandatory for all students in public schools since 2006. By introducing ethics in schools which concentrated on moral values and commonly accepted norms, German government hoped to promote the integration process of immigrants, including Muslim minorities. The classes were designed to be religiously-neutral, although they did not necessarily excluded the cultural values of Christianity. The initiative resulted in numerous debates around the country, and eventually led to Berlin referendum. The most heated question was whether school children should be allowed to choose between ethics classes and religious instruction. According to the *Local Germany's news*, the turnout for the referendum was quite low, about 30 percent of German voters, among which 48.5

percent voted for the implementation of voluntarily ethics classes, instead of compulsory, giving a freedom of choice to school children to choose between ethics and faith-based religious instruction, while 51.3 percent voted against (AFT, 2009). The Turkish Islamic Union for Religious Affairs, known as DITIB, highly supported the pro-choice side; as Ender Cetin, the spokesperson of DITIB, argues religious instruction in public schools would prevent Islamic fundamentalism -- “It's important that schools have enlightened Islamic lessons -- and that we avoid unofficial Koran lessons in backyards” -- says Ender Cetin (SPIEGEL Online, 2009).

Comparing to Germany, religious instruction in France has been under the constant control by French administration. In spite of proclaimed religious freedom, the possibility of implementing religious education in public schools, beyond the formalized educational remains incredibly low. The arguments vary from the necessity to maintain *laïcité* principle, advocating French tradition of secularism and religious equality, to recognition of cultural diversity and necessity for religious toleration. French Constitution of 1958 does not provide an explicit definition on religious education; the regulation itself appears to be quite dubious, claiming that “the principle of lacism in public schools is one of the elements of lacism of the State and of the neutrality of the whole public service” (Martin, 2007: 263). The principle of secularism is usually associated with its ideological conception of neutrality, highlighting the importance of religious equality, and separation between Church and the State. Nevertheless, the neutral character of French secularism has been highly criticized, as it opposes any religious influence in the society. The law banning religious symbols in public schools and governmental organizations reaffirms the fact that French principle of religious equality is rather biased. Interestingly enough, the *laïcité* principle of France is a combination of different approaches to expel religion into the private sphere. Oliver Roy in one of his books on the integration of Muslim minorities, mentions two forms of state-enforces secularism in France: the legal *laïcité* which assumes the

separation between Church and the State, and the ideological interpretation of the principle, which presupposes the openness to religious pluralism, with highly regulated presence of religion in the public sphere (Roy, Holoch, 2007: 7). In spite of its dubious approach to secularism, French government highly supports religious activities with the purpose of promoting integration of Muslim minorities. Recognizing the socio-cultural role of Islam in the history of state formation, the government of France also supports various programs on social integration, including vocational and language trainings.

Most of the European legislative systems presuppose the implementation of religion classes in the educational and social spheres, claiming that such innovations would facilitate the consolidation of moral norms and social stability in European states. Religious organizations, on the other hand, should not be perceived as a negative element in integration process; on the contrary these associations stipulate the inclusion of minorities into the host society by smoothing the cultural differences between groups.

3.1.3 Islamophobia and Discrimination

While analyzing religious freedom in Germany and France, the questions of discrimination, Islamic fundamentalism and religious hostility are of a great importance. It would be wrong to assume that public attitudes in France have been incredibly hostile towards Muslim minorities for the last several decades. Nevertheless, the issues of religious discrimination is evidenced by numerous anti-immigration protests around the country, moreover the anti-immigration views are reinforced by several political parties. Thus for example, the National Front Party (NFP) of Jean Marie LePen, known as far-right party, highly opposes Muslim immigration, attempting the expulsion of immigrants “at a rate of 1200 per day over Le Pen’s seven year presidency” (Fekete, 1995). Among the most violent instances of religious hostility in

France, one could mention the case of vandal attacks of over 500 Muslim war soldiers' graves on the eve of the Muslim holiday in April of 2008, characterized by President Sarkozy as "the expression of a repugnant racism directed against the Muslim community of France", as well as the mosques vandalism, civil unrest of 2005, scarf controversy, and mass destruction of worship houses (BBC news, 2008).

In order to understand the circumstances which provoked civil unrest in numerous European countries, it is important to analyze the specificity of each country, including its democratic institutions and historical pre-conditions. Noticeably, in just several decades Islam transformed into significant factor of European public life, and without accounting for religious and cultural specificity, it would be impossible to make any predictions on future development of European community. Interestingly enough, today's Europe faces the de-Europeanization process -- highly suppressed by the policies of assimilation or acculturalization, Muslim communities refuse to accept Western European values and moral principles; on the contrary, immigrants of Muslim faith who have always strived for European identity, are now integrating into the Muslim communities, generating greater isolation and public hostility.

Not being able to adopt European cultural traditions, immigrants started to associate themselves with "worldwide Muslim community", which is highly supported by external religious organizations and Islamic fundamentalist movements. Therefore, it seems to be incredibly difficult to provide a precise explanation of the violent events occurred in France. It can be concluded that there were no substantial reasons for such protest actions -- no political or confessional slogans were raised, the mass demonstrations were well-prepared in advance, while the names of the organizers are still unknown. The Europe is apparently frightened, and has to make a decision whether to continue its integration policies and strive for immigrants' acculturalization or to join the global fight against Islamic extremism, with all the following

political consequences. As for everyday practices, an Algerian PhD student at the Department of Public Policy mentions:

I have not experienced the evident discrimination on everyday basis, probably because I have distanced the Algerian traditions or the culture, trying to adopt French values. Nevertheless, the religious side is different. Here you definitely can feel the social tensions between French and Algerian community (interviewee 3).

The German case does not paint an optimistic picture either. In contrast to France, where the waves of violence towards Muslim minorities and immigrants were provoked by discontented immigrants themselves, in Germany the violence was generated by the native population. For the last several decades Germany faces the rapid increase in birth rates, while the birth rates of German population remain scarce, the birth rate of Turkish minority keeps increasing. Turkish communities are mainly concentrated in the urban areas of Germany, thus for instance, 136,400 residents are living in the district of Kreuzberg, while Cologne and Duisberg includes more than 30,000 Turkish immigrants (Pauly 2004: 70). In September 2008, the construction of the grand mosque in Cologne provoked the formation of the first “Anti-Islamic Congress”. According to *Antifaschistische Action* internet blog, the congress was organized by Pro Köln movement, which highly opposes the spread of Islamization and aims at the immediate limitation of immigration. It included the representatives of far-right parties around the Europe: Vlaams Belang, Lega Nord, British National Party, demanding the reconsideration of European policies towards immigrants and Islam in general. The congress was cancelled due to numerous anti-racist demonstrations around the city, supported by the opponents of pro Köln movement (Winkelbach 2009).

It is quite understandable that majority of German population perceive Turkish minority as immigrants who are demanding social benefits and job placements, without the willingness to accept cultural norms and traditional German values. The intolerance towards immigrants is

based on everyday practices: while the low level of education and lack of language skills deteriorates the possibilities of integrating on the labor market, the cultural and religious differences serve as a “corner stone”, impairing the socialization process. In August 2006 Germany signed the General Equal Treatment Act, the first anti-discrimination law which provides the “legal protection against unjustified unequal treatment of various social groups and avoids the creation of a certain hierarchy of different grounds of discrimination” (Peucker, 2007: 3). The General Equal Treatment Act is different from all former anti-discrimination policies, as it covers all spheres of activities, from labor discrimination to civil, and includes the requirements of EU Directives: Article 13 of the Amsterdam Treaty and Race Equality Directive (Peucker, 2007: 3-4).

3.2 Living and Speaking in Germany and France: the major obstacles of successful linguistic integration

Among all other factors that influence the embeddedness of Muslim minorities into the European societies, linguistic integration is one of the core elements in the process of immigrants’ social inclusion. In spite of its positive developments in the field of pre-school education, German educational system is still facing the serious obstacles to successful linguistic integration. The percentage of discriminatory practices in high schools and universities remains quite high. As Gesseman mentions, there is a huge imbalance between education opportunities of children with German citizenship and non-German. The statistical results are quite striking, 23% of children with immigrant background drop secondary schools without obtaining any certificate; another 29% of graduates obtain the lowest certificate only (Gesseman, 2006). Every year the federal government of Germany spends millions of Euro on educational programs for immigrants, however the success of such programs is rather questionable. The multiculturalism policies in the sphere of education require non-German minorities to be loyal to democratic

principles and respect cultural differences. However, the changes in governmental policies resulted in greater isolation of immigrants. Turkish immigrants formed their own parallel communities, which deteriorated the process of linguistic integration. The report presented by Organization for Economic Cooperation and Development (OECD) demonstrates the inefficiencies of German educational system for immigrant children. According to the results of the Program for International Student Assessment (PISA), Germany's educational system was "in the bottom third of industrialized nations surveyed" (SPIEGEL Online, 2006).

The problem of cultural adoption is constantly worsening. Since Turkish families are traditionally characterized by having multiple children, as opposed to German families, numerous schools located in the neighborhoods with high concentration of Turkish immigrants, practically transform into ethnic schools. Such concentration of immigrants in public schools prohibits all the attempts to ingrate Turkish minority into German society: in the environment when out of ten school children nine are the representatives of Turkish minority, the probability of German students to speak Turkish is much higher than the probability of Turkish students to exercise their German skills. The success of language policies also depends on strong cooperation between government and minorities' families. By implementing the changes in the educational system, government ensures that children from the middle or even low class would have an access to the state-sponsored language courses; however, none of these changes would contribute to linguistic integration if the parents would not be willing to cooperate with school teachers. Speaking German in Turkish families would not only help children to improve their language skills, but also would highly contribute to cultural embeddedness into German society. Such language tradition, transformed from one generation to another would change personal perceptions of immigrants, facilitating their acculturation and identification with a prevailing culture.

In spite of all the obstacles to successful linguistic integration, there are positive developments in the policies proposed by Federal Government. As it was reported by the International Seminar on Linguistic Integration of Adult Migrants (2005), the Immigration Act that came to power on January 1, 2005 grants foreigners the access to German language training. The program is implemented by the Federal Agency for Refugees and Immigrants with the financial support of the Federal Government. Immigrants must take the language training module which includes 600 hours of language courses combined with the civic education on German culture, history, legal systems. From 2005 newly arrived immigrants are required to participate in the integration program, the non-attendance results in 10% reduction of a social welfare. The language courses are substituted by German Government, while immigrants can contribute the amount of 1 Euro per class (Council of Europe: 14-15).

The linguistic politics in France could be characterized by centralization of French language and its diffusion on the territory of France as a unified language standard. The policies were highly promoted and propagandized by numerous governmental organizations, state NGOs, churches and schools. French government has always strived for cultural unity, rejecting the ideas of multiculturalism, therefore language was perceived as one of the tools to foster minorities' assimilation. In 1972 French President Jean Pompidou implemented the monolingual policies, declaring that "there is no place for regional languages in France" (Spolsky, 2004: 66). The law passed on December, 31 of 1975 prescribed that all commercial advertisements, as well as technical description of the consumer products should be on French, or accompanied by French translation, the recruitment contracts and information for employees should also be provided in their native languages, with a certified French translation. The media programs and the international congress meetings were also supposed to be dubbed into French (Spolsky, 2004: 68). With the constitutional law passed on June 26th, 1992 French language was officially

declared as a language of France (*La langue de la République est le français*), while the languages of ethnic minorities, became the national heritage (Eyden, 2003: 236). Discussing the successes and failures of the French integration model, the representative of Algerian minority responded:

I cannot say that I feel more French than Algerian. The Algerian citizenship is part of me, these are my roots. Each year, each 2 years, I go to Algeria to visit my family. The integration policies help Algerians to integrate into French society; however they are not able to force us to adopt the French principles and cultural values (interviewee 1).

SUMMARY AND FINDINGS

The following research has examined the major obstacles of successful integration of Muslim minorities on the territory of Federal Republic of Germany and France. Analyzing the multicultural pattern of integration vs. assimilation model, the study illustrates the drawbacks of each approach, and suggests that multiculturalism appears to be more successful in promoting tolerance, and maintaining the principles of cultural, linguistic and religious equality. The French approach to integration which presupposes total dissolution of ethnically diverse cultures into ‘homogeneous’ French society has always been considered to be the ideal model of integration. The model itself is exceptionally simple: one nation, one language, one country. There is no space for differentiated minorities, rather for French citizens only. The reality, however, demonstrates quite different outcomes. By implementing the policies which neglect the ethnic differences and cultural values of minorities, French government heightens the relationship between prevailing population and non-French immigrants. Although the ideological basis of French approach to integration is beyond any doubt, the model itself is not ideal. There is still a long way towards successful integration of Muslim minorities into French society.

The German case, in spite of its numerous obstacles and failures is slowly moving towards gradual change of immigration policies. In contrast to France, the Federal Republic of Germany has never been the “integrating” state. The economic reconstruction of 1950s demanded the increase of low-skilled labor, Turkish immigrants were expected to contribute to German economy and return to their home countries. However, most of the foreigners decided not to leave the country, and from 1980s Germany was facing the period of rapid increase of immigrant population due to family reunifications, marriages and births. The integration obstacles prevailed especially among the Muslim population, since the difference in cultural traditions and religious practices were exceptionally vast. Nevertheless, Germany was able to implement the changes in immigration policies, and introduce the educational reforms, maintaining cultural heterogeneity of the society, yet being able to maintain tolerance and religious equality.

My initial hypothesis that the more the government of the hosting country emphasizes on the need for multicultural approach to integration, as opposed to assimilation model, the more successful the integration of Muslim minorities is, has been confirmed by numerous empirical findings. The hypothesis was tested through several variables, mainly the religious freedom, which was characterized by public access to Islamic associations, their cooperation with national governments and everyday religious practice; linguistic integration and educational policies which provided an overview of the actions taken by French and German governments to integrate Muslim communities both on the social and economic levels; naturalization and immigration policies which presented a clear picture of different approaches to immigration itself, and offered possible explanations of differences in outcomes.

The findings suggest that both Germany and France are facing the same problems of Muslims’ exclusion from the prevailing culture. Neither Germany, nor France was able to fully integrate Muslim minorities, and to solve the issues of socio-economic isolation of immigrants.

Comparing the naturalization policies and access to citizenship, one can conclude that *jus sanguinis* approach to citizenship in case of Germany, and simplification of naturalization policies in the case of France do not necessarily reflect the success or failures of the integration process. The undemanding naturalization policies in France, simplified especially for the residents from former French colonies, are not able to solve the discrimination issues reflected in every day practices. While Muslim communities are still facing the negative public attitudes, religious organizations in France are still under the strict control of French administration. In spite of proclaimed religious freedom, French government highly advocates the *laïcité* principle, striving for secular Republic, where religious is kept to the private sphere only. As opposed to France, Germany has implemented the educational reforms, by introducing the Islamic religious classes into school curriculum on the basis of voluntary attendance. The historically determined relationship between the state and church, also serves as a positive factor in integrating Muslim communities. The issues related to religious instruction in German schools are still being highly debated, nevertheless the willingness of German government to implement the changes into educational system reflect the positive prospects for integration policies.

Comparing two different approaches to integration – multiculturalism and assimilation, it can be concluded that multicultural pattern of integration is more successful in integrating Muslim communities, while promoting the principles of tolerance and religious equality. The French model illustrates the softer approach to integration, characterized by simplifies naturalization policies and undemanding access to citizenship, nevertheless by reinforcing cultural assimilation of immigrants, the integration policies result in social tensions between prevailing population and minority, leading to even greater isolation of the latter group.

RECOMMENDATIONS

Various scholars, analytics and many other interested groups present their views, concerning the issue of integration of the Muslim minorities; nonetheless, most of the recommendations are directed to the government, not to other parties. Several proposals with regards to resolve integration issues could be made.

- Public Relations: Propaganda of Multiculturalism
- Restructure/Simplify Federal and Local Governments
- Simplification of the Naturalization Policies and Citizenship Procedures
- Educational Reform
- Reconsideration of the Role of the Religious Organizations

Conspicuously, these alternatives have several advantages and disadvantages. The first alternative solution is based on the principles of public relations. The expenditures on this project are moderate; however, the outcomes may be very productive. The government may use the state TV channels, local newspapers, internet and other sources of information to proliferate multicultural values and equality of rights. In fact, by promoting peaceful coexistence and cultural pluralism, the both states may drastically decrease discriminative tendencies in the society and accelerate the integration of the Muslim minorities. Furthermore, strong open position of German and French governments regarding this issue may increase the activity of the Muslim civil associations and bolster their contribution to the faster integration. However, the propaganda of multiculturalism has to be implemented very thoroughly, deterring the development of the interethnic and interreligious tensions. Another proposed policy, which deals with the federal structure of the government, is impossible to accomplish nowadays. In the case of Germany, the problem of integration of the Turkish minority is not enough to change an

established federal system. Moreover, no political or civil organization is able and is willing to affect this structure and implement such radical changes. Ironically, this radical policy would not be accepted neither on the local level nor in the Upper House.

The simplification of the naturalization policies is also a difficult objective to achieve. The Migration Committee and German government are not interested in decreasing the citizenship threshold and in alleviation of the naturalization procedures, even though many Turkish Muslims may finally acquire the German citizenship and become full members of the German society. This policy may boost the number of immigrants, and this situation may seriously affect the domestic affairs, and economic situation overall. Just in neighboring France, where simplified naturalization procedures even worsened socio-economic situation. French government supports immigrants financially by providing different allowances, in the same time putting the pressure on the shoulders of French taxpayers.

Educational reform is one of the most effective long-run solutions. Even though both of the states have to allocate certain portion of the budget funds to cover all expenses, the results seem to be very promising. This policy amalgamates various aspects, mainly focusing on the elementary and secondary education. The German and French governments have to incorporate a policy, which will compel all Muslim minorities' children to go to the public elementary schools and kindergartens. The education in these establishments has to be free for these kids, has to be taught in local languages and the courses such as European history, literature, art and religious studies have to be included in the curriculum. Moreover, the obligatory kindergartens may help immigrant children to smoothly adopt European traditions and cultural values. Several publicly funded evening schools have to be opened for the adult immigrant population, even though the obstacle may be the low attendance and abstention of the immigrants. Because of the difficulties of the adults' integration this educational policy should mainly focus on the growing generations

rather than on the grown immigrant population. By working with the children, the Germany and France may be able to eradicate the problem of disintegration and accelerate the process of cultural amalgamation.

Finally, the feasibility index of the reconsideration of the religious organization is not high. The membership in such organizations is low; however, each organization has its own target group and its own members. Several changes could be made concerning the DITIB role. Noticeably, it is controversial and difficult for the German government to create one religious organization, which will unite all Muslims, including the Turkish minority. Therefore, the DITIB will still be the lone representative and partner of the German state in the religious affairs. However, this organization should be less concerned about Turkey and be more focused on the German internal affairs. The governing and administrative positions should be held not by the Turkish citizens, but rather by the German citizens of the Turkish origin. In addition, the representatives of other ethnic groups and Germans themselves should not be excluded from the participation in these affairs.

APPENDIX

Interviewees:

1. Joel S. Fetzer. Associate Professor of Political Science at Pepperdine University.
2. Law Student at the Andr ssy Gyula German Language University of Budapest, Hungary.
3. PhD Student at the Department of International Public Policy. George Mason University. Virginia, U.S.A.
4. Graduate Student at the Department of International Affairs. Shepherd University. West Virginia. U.S.A.
5. Accounting Manager. European Fund Administration. Paris, France.
6. PhD Student at the Department of Social Integration and the Welfare State. Bremen University, Germany.

Most of the respondents preferred to remain anonymous.

Interview questions:

- How would you characterize the level of Turkish integration into German society? Do you identify yourself as a full-fledged member of German society?
- Are you comfortable with practicing Turkish traditions and culture without being offended or discriminated by German population?
- One of the most important aspects of integration is the linguistic integration. How successful are the educational policies in integrating Turkish minority? Do you speak German or Turkish at home? Did you have any special language training sponsored by German government?
- Have you or your friends ever experienced discrimination on the basis of your origin? Can you briefly describe the situation, if there was such?

- It has been affirmed that naturalization procedures in Germany have been relatively simplified. From your own observations, how would you describe the change in the integration process starting from 1980s until 2009?
- How would you characterize the role of religious organizations for example the *Turkish Islamic Union for Religious Affairs* (DITIB/ “*Diyanet Isleri Turk-Islam Birliği*”) in promoting the integration process?
- Several political parties of Germany have proposed dual citizenship that was eventually rejected. Do you think that reforming citizenship laws to permit dual nationality can be seen as one of the solutions to integration issues? Are you a German or a Turkish citizen?
- Do you agree or disagree that policies of multiculturalism in Germany have been successfully implemented?
- In your opinion, can multiculturalism as opposed to assimilation approach to integration eliminate the hostility towards Muslim minorities? Does assimilation pattern of integration lead to weak ethnic retention?

References:

- Brubacker W. 1994. Citizenship and nationhood in France and Germany. Harvard University Press.
- Castles S., Davidson A. 2000. Citizenship and Migration. Globalization and the politics of belonging. 70-81. Macmillan.
- Cornelius W. Tsuda T. 2004. Controlling Immigration: A Global Perspective. 190-195. Stanford University Press.
- Eyden T. 2003. Public Management of Society: Rediscovering French Institutional Engineering in the European Context. 230-238. IOS Press.
- Feldblum M. 1999. Reconstructing citizenship. The politics of nationality reform and immigration in contemporary France. SUNY Press.
- Geddes A. 2003. The politics of migration and immigration in Europe. 110-126. SAGE.
- Heine P., Syed A. 2005. Muslimische Philanthropie und bürgerscaftliches Engagement. 284-296. Maecenata Verlag.
- Horner W., Kopp B., Mitter W. 2007. The educational systems of Europe. 330-352. Springer.
- Kastoryano R., Harshav B. 2002. Negotiating Identities: States and Immigrants in France and Germany.
- Kommers D. 1997. The constitutional jurisprudence of the Federal Republic of Germany. 440-445. Duke University Press.
- Kopp B. 2002. German Multiculturalism: Immigrant Integration and the Transformation of Citizenship.
- Kymlicka, W. 2003. *Politics in the Vernacular: Nationalism, Multiculturalism and Citizenship*. 19-25. Oxford Press.
- Lewis R. 2006. Multiculturalism Observed: Exploring Identity. 108-127. Brussels: ASP/VUBPRESS.
- Martin M. 2007. The Cambridge companion to atheism. 260-265. Cambridge University Press.
- Modood T, Werbner P. 1997. The Politics of Multiculturalism in the New Europe: Racism, Identity, and Community. (110-118). Palgrave Macmillan.
- Nathans E. 2004. The politics of citizenship in Germany: ethnicity, utility and nationalism. Berg Publishers.

Noiriel G. 1996. *The French Melting Pot: Immigration, Citizenship, and National Identity*. University of Minnesota Press.

Parekh, B. 2000. *Rethinking multiculturalism: Cultural Diversity and Political Theory*.

Patrick J. 2003. *Immigration the world over: statutes, policies, and practices*. 151-161. Rowman & Littlefield.

Pauly R. 2004. *Islam in Europe: integration or marginalization?* 68-85. Ashgate Publishing Ltd.

Reichert E. 2006. *Understanding human rights: an exercise book*. 110-128. SAGE.

Roy O., Holoch G. 2007. *Secularism confronts Islam*. 5-15. Columbia University Press.

Silverman M. 1992. *Deconstructing the Nation. Immigration, racism and citizenship in modern France*. Routledge.

Spolsky B. 2004. *Language Policy*. 60-78. Cambridge University Press.

Watson W. 2003. *Tricolor and crescent: France and the Islamic World*. Greenwood Publishing Group.

Internet sources:

Aliens Act Extracts (*Ausländergesetz*). 1990. <http://www.iuscomp.org/gla/statutes/AuslG.htm> (accessed May 12, 2009).

ATP. 2009. Berliners vote on religious education. *The Local Germany's News in English*. <http://www.thelocal.de/society/20090426-18879.html> (accessed May 28, 2009).

BBC news. 2008. Vandals hit French Muslim Graves. <http://news.bbc.co.uk/2/hi/europe/7771491.stm> (accessed, May 20, 2009).

Casciani D. BBC News Community Affairs. *An illegal immigration amnesty?* http://news.bbc.co.uk/2/hi/uk_news/politics/4989874.stm (accessed May 15, 2009).

Council of Europe. 2005. *The Linguistic Integration of Adult Migrants. International Seminar*. http://www.coe.int/t/dg4/linguistic/Source/Migrants_Sevres2005_linguistic_integration_EN.pdf (accessed May 18, 2009).

Fekete L. *Issues in the French presidential elections*. 1995. IRR news. http://www.irr.org.uk/europebulletin/france/extreme_right_politics/1995/ak000006.html (accessed May 12, 2009).

Fernando M 2005. *The Republic's "Second Religion": Recognizing Islam in France*. Middle East Report 235. <http://www.humanityinaction.org/docs/Frenchislam.pdf> (accessed May 16, 2009).

- Glennon M. 2003. Self-Determination and Cultural Diversity.
<http://fletcher.tufts.edu/forum/archives/pdfs/27-2pdfs/Glennon.pdf> (accessed May 12, 2009).
- Hamilton K. (2004). Migration Policy Institute. The Challenge of French Diversity.
<http://www.migrationinformation.org/Profiles/display.cfm?id=266> (accessed April 25, 2009).
- Helplinelaw.com. Germany Constitution.2003.
<http://www.helplinelaw.com/law/germany/constitution/constitution01.php> (accessed May 18, 2009).
- International Crisis Group. 2007. *Islam and Identity in Germany*. Europe Report N°181.
<http://www.crisisgroup.org/home/index.cfm?id=4693&l=3> (accessed March 12, 2009).
- OECD 1999. *Trends in International Migration*. Organisation for Economic Co-operation and Development, Paris.
- Peucker M. 2007. Equality and anti-discrimination approaches in Germany. European Forum for Migration Studies. http://www.efms.uni-bamberg.de/pdf/Anti-discrimination_in_Germany.pdf (accessed May 20, 2009).
- Public Domain Information System Providing a Full Archive of European Court of Human Rights Documents. 2005. http://www.echr-base.ru/protocol1_conven.jsp#eng (accessed May 16, 2009).
- Sander, A., Larsson, G. & Kos-Dienes, D. 2000. *State Policies Towards Muslim Minorities In The European Union*. Göteborg University, University of Warwick, & European Research Forum on Migration and Ethnic Relations. http://www.emz-berlin.de/projekte/pdf/mus_pol_final.pdf (accessed April 4, 2009).
- Schwirner S. 2006. Multiculturalism and successful integration – a capable system or contradiction? http://essay.utwente.nl/57838/1/scriptie_Schwirner.pdf (accessed May 28, 2009).
- SPIEGEL Online. 2006. Immigrants in Germany Falling Behind.
<http://wissen.spiegel.de/wissen/dokument/dokument.html?titel> (accessed May 20, 2009).
- SPIEGEL online International. 2009. A culture clash in Berlin. Referendum Pits Ethics against Religion. <http://www.spiegel.de/international/germany/0,1518,620817,00.html> (accessed May 15, 2009).
- Simon E. 2008. CES hosts talk on integration of Islam into contemporary France. FAS Communications. <http://www.news.harvard.edu/gazette/2008/05.08/11-france.html> (accessed May 10, 2009).
- The Federal Chancellor. 2006. *Integration Summit: “an almost historical event”*.
http://www.bundeskanzlerin.de/nn_127694/Content/EN/Artikel/2006/07/2006-07-14-pressekonferenz-integrationsgipfel_en.html (accessed May 10, 2009).

Thomas V. 2008. Islamic Religious Instruction in Germany.
<http://www.goethe.de/ges/phi/thm/red/en3331684.htm> (accessed May 13, 2009).

Reuters UK. 2008. France says no to mass amnesty for illegal immigrants.
<http://uk.reuters.com/article/worldNews/idUKL2404202220080424?pageNumber> (accessed May 15, 2009).

Winkelbach A. 2009. Lets do it again: Prevent the Anti-Islam Congress at AIK2.
<http://september.web-republic.de/aik2/?p=72> (accessed May 30, 2009).