



New  
Direction

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# **EU CITIZENSHIP POLICY**

**A Downstream Issue from  
Migration and Integration**



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# Introduction ON EU CITIZENSHIP

The concept of European Union (EU) citizenship occupies a critical space in contemporary debates about migration, national identity, and the future of European integration. Introduced by the Maastricht Treaty in 1992, EU citizenship provides individuals of member states with rights that transcend national borders, including the freedom to move, work, and reside anywhere within the EU. However, the very notion of EU citizenship remains contested, raising questions about its scope, purpose, and compatibility with the resurgence of national sovereignty and identitarian political and social movements across Europe.

The importance of discussing EU citizenship lies in its role as a cornerstone of the European integration project, representing both the aspirations and tensions within the European Union's evolution. EU citizenship goes beyond economic cooperation and reflects a more profound ambition: to foster a political and social union among diverse member states. It embodies the ideals set out in foundational documents like the Schuman Declaration and the Treaty of Rome, where the vision of a supranational community transcending national rivalries was first articulated.

Central to the importance of EU citizenship is an evident challenge to traditional notions of national or state sovereignty. By granting individuals rights independent of their national citizenship, EU citizenship redefines the relationship between citizens and their member states. This supranational dimension raises complex questions about the balance of power within the EU, particularly concerning reverse discrimination, where nationals of a member state may find themselves treated less favourably than citizens of other EU countries in that country's territory. These tensions highlight the need for fairness and equality, principles that are fundamental to the promise of EU citizenship but remain unevenly realised in practice.

EU citizenship also symbolises the EU's motto, "*United in Diversity*."<sup>1</sup> It provides a framework for fostering a shared European identity while respecting member states' distinct cultural and political identities. In an era marked by rising nationalism and populism, EU citizenship is seen by many as a counterbalance, emphasising common rights, values, and solidarity across borders. This is particularly significant as

populist movements challenge the legitimacy of the very vision of the EU—some with a reformist spirit, others with an anti-EU scepticism—making it vital to articulate the benefits and purpose of a unified Europe.

The rights associated with EU citizenship, such as freedom of movement, non-discrimination, and political participation, have profound implications for individuals as well as groups and communities. These rights not only affect citizens' daily lives but also reflect the evolving nature of the EU's legal and political framework. As a result, exploring the development and application of these rights helps illuminate the successes and shortcomings of EU citizenship, including its capacity to ensure fairness and equality for all individuals within the Union.

Moreover, EU citizenship embodies the broader political objective of the EU, often referred to as its *finalité politique*. It represents the tension between unity and diversity inherent in any multinational union. The question of whether EU citizenship should remain a complement to national citizenship or evolve into a fully-fledged, standalone status reflects ongoing debates about the EU's ultimate goals. This debate has far-reaching implications for the future trajectory of European integration, influencing the EU's legitimacy and ability to address shared challenges effectively. As such, the discussion of EU citizenship is inherently tied to the future of the European Union itself.

Despite the 30-year lifespan of the concept of EU citizenship, economic crises, political instability and mass migration have profoundly altered Europe's demographic, cultural, and political fabric. In recent years, the influx of migrants and refugees has triggered debates over the definition and boundaries of national identity. These debates often pit citizenship, understood as a legal and political status, against nationality, which is closely tied to culture, language, and historical heritage.

The rise of sovereigntist movements in Europe has further challenged the concept of EU citizenship. Political parties and movements advocating for national sovereignty argue that decisions about citizenship and identity should remain under

<sup>1</sup> "United in diversity", the motto of the European Union, first came into use in 2000. It signifies how Europeans have come together, in the form of the EU, to work for peace and prosperity, while at the same time being enriched by the continent's many different cultures, traditions and languages. More information available at: [https://european-union.europa.eu/principles-countries-history/symbols/eu-motto\\_en](https://european-union.europa.eu/principles-countries-history/symbols/eu-motto_en)

the control of individual member states rather than being centralised in Brussels. This sentiment has been particularly strong in countries like Hungary, where governments emphasise the primacy of national traditions and national sovereignty over EU integration, raising the question of what role EU citizenship plays in a landscape where national identities remain deeply entrenched.

The sovereigntist surge has been rapidly growing after the Brexit referendum (2016). The ascent of national populist parties across the EU, such as Portugal, Spain or France, is a good example of this phenomenon. This turn reflects broader scepticism about the EU's role in shaping policies that touch on deeply sensitive issues, such as migration, cultural integration, and the rights of minorities. As a result, the tension between national sovereignty and supranational citizenship is intensifying, calling into question the future of EU citizenship as a meaningful and cohesive concept.

An intelligently designed, correctly communicated, and implemented concept of EU citizenship may be vital to overcome these challenges. It can provide a framework for addressing shared threats and ensuring the rights of individuals in an increasingly interconnected Europe. It can also provide a foundation for cooperation on critical issues, such as economic mobility, human rights, and cross-border integration. Moreover, the concept of EU citizenship counterbalances the

fragmentation that can arise from excessive nationalistic and nativistic tendencies.

In summary, in an era of geopolitical uncertainty and internal division, the debate over EU citizenship is not just a legal or institutional issue but also a profound exploration of what it means to belong to a shared European project. Understanding the significance of EU citizenship makes it possible to shape its role in fostering a more cohesive and unified European community, even as it navigates the challenges posed by diversity and national interests. Understanding the implications of EU Citizenship requires examining the historical development, theoretical underpinnings, and practical applications of citizenship policies across the EU, which this study aims to do in subsequent chapters.

In the following chapters, this report delves into the evolution of EU citizenship over the past three decades (Chapter 2). Chapter 3 compares how member states approach citizenship and integration and analyse the impact of specific policies, such as Austria's religious integration strategy (Chapter 4). Chapter 5 puts forward some policy strategies highlighting the possibilities and limitations of EU citizenship as a tool for unity in an increasingly fragmented political landscape and to present a united front for the shared challenges that affect the entire EU. Finally, Chapter 6 concludes with some policy recommendations as a way forward.

## 2

# HISTORY AND EVOLUTION OF EU CITIZENSHIP

## 2.1. Early Foundations and Aspirations

The concept of European Union (EU) citizenship has undergone significant transformations since its inception, reflecting the dynamic nature of European integration and the evolving relationship between the EU and its member states. This chapter delves into the historical milestones, theoretical foundations, and key developments that have shaped EU citizenship.

The origins of EU citizenship can be traced back to the aftermath of World War II, a period marked by a strong desire for peace and stability in Europe. The Schuman Declaration (1950)<sup>2</sup> and the Treaty of Paris (1951) laid the groundwork for the establishment of the European Coal and Steel Community (ECSC) in 1951. The Treaty of Paris was a pioneering step towards economic integration, aiming to make war between historic rivals “not merely unthinkable, but materially impossible.”<sup>3</sup>

This initiative was followed by the Treaty of Rome in 1957, which created the European Economic Community (EEC) and

introduced the principle of free movement for workers, laying the groundwork for future citizenship rights. This economic focus shaped the early understanding of European rights as privileges linked to common market participation rather than universal entitlements.

In the 1970s, the idea of a European identity gained traction. The 1972 Paris Summit emphasised the need for a “European identity” to deepen integration, leading to discussions on enhancing citizens' rights within the Community. This period also saw the first direct elections to the European Parliament in 1979, a significant move towards involving citizens more directly in the European project.

All these efforts culminated in the Maastricht Treaty, which marked a turning point by formally establishing EU citizenship in 1993. Article 8.a.1 of the treaty declared: “Citizenship of the Union is hereby established. Every person with a Member State's nationality shall be a Union citizen.”<sup>4</sup>

## 2.2. Establishment of EU Citizenship: The Maastricht Treaty

The Maastricht Treaty, signed in 1992 and entering into force in 1993, marked a pivotal moment by formally introducing the status of EU citizenship. This development aimed to bring the Union closer to its citizens and express its character as more than a purely economic union. It paved the way for greater integration towards a political union<sup>5</sup>, thus affecting the notion of citizenship and the rights that it entailed.

The rights associated with EU citizenship were expanded under Maastricht, encompassing freedom of movement and residence, electoral rights in municipal and European Parliament elections, consular protection, and the ability to petition EU institutions. These rights symbolised a shift from the market-based rights of the earlier EEC framework to a more

inclusive and universal vision of citizenship. EU citizenship granted individuals a set of rights, including:

- Freedom of movement and residence: The right to move and reside freely within the territory of the member states.
- Electoral rights: The right to vote and stand as candidates in municipal and European Parliament elections in the member state of residence under the same conditions as nationals.
- Consular protection: The right to seek consular protection from any member state when outside the EU if their own country is not represented.

<sup>2</sup> Schuman Declaration (May 1950). Available at: [https://european-union.europa.eu/principles-countries-history/history-eu/1945-59/schuman-declaration-may-1950\\_en](https://european-union.europa.eu/principles-countries-history/history-eu/1945-59/schuman-declaration-may-1950_en)

<sup>3</sup> See the History of the EU. Available at: [https://european-union.europa.eu/principles-countries-history/history-eu\\_en?utm](https://european-union.europa.eu/principles-countries-history/history-eu_en?utm)

<sup>4</sup> Treaty of the European Union. *Official Journal C 191*, 29/07/1992 P. 0001 – 0110. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A11992M%2FTXT>

<sup>5</sup> Shaw, J. (2019). ‘EU citizenship: Still a Fundamental Status?’. In: Bauböck, R. (eds) *Debating European Citizenship*. IMISCOE Research Series. Springer, Cham.

- Petition and complaint rights: The right to petition the European Parliament and apply to the European Ombudsman.

These rights were designed to foster a sense of belonging and participation among EU citizens, transcending national boundaries. However, the introduction of EU citizenship also formalised the connection between individual rights and supranational governance. This was something which, in turn, further challenged traditional notions of state sovereignty.

## 2.3. Recent Developments and Future Prospects

The evolution of EU citizenship did not stop with Maastricht. Subsequent treaties and legal rulings have since refined and expanded its scope. The Amsterdam Treaty (1997) reinforced the status of EU citizenship as complementary to, rather than replacing, national citizenship. Case law from the Court of Justice of the European Union (CJEU) has played a crucial role in interpreting and expanding citizenship rights. For instance, rulings such as *Ruiz Zambrano*<sup>6</sup> and *Grzelczyk*<sup>7</sup> emphasised that EU citizenship is “destined to be the fundamental status of nationals of the Member States,” highlighting the significance of EU citizenship beyond economic integration.

In more recent years, the EU has taken further steps to strengthen and promote EU citizenship. The EU Commission reports on applying the EU citizenship provisions every 3 years and proposes new priorities for the next 3 years. As a result, the latest report was the 2023 EU Citizenship Report<sup>8</sup>, which outlined actions to ensure that citizens can fully enjoy their rights, focusing on areas such as electoral participation, protection abroad, and simplifying administrative procedures.

Last year also marked the 30th anniversary of the Maastricht Treaty’s entry into force<sup>9</sup>, and so did the concept of EU citizenship, prompting reflections on its achievements and future direction. The European Commission presented measures to reinforce citizens’ rights, emphasising the importance of active participation in the democratic process and addressing challenges such as misinformation and barriers to free movement.

The roadmap towards better EU citizenship also includes surveys and polls. One of the most recent and important ones has been the 2023 Flash Eurobarometer survey on citizenship and democracy<sup>10</sup>. The main results of this Eurobarometer were:

- Almost 9 out of 10 respondents (87%) agreed they felt like citizens of the European Union, with more than 6 out of 10 (63%) fully agreeing.
- The proportion of respondents who felt they were European Union citizens was at least 80% in all member states.
- Two-thirds (66%) of respondents had heard of the term ‘citizen of the European Union’ and knew what it meant. 25% had heard of the term but were unsure what it meant, and only 9% had not heard of the term at all.
- Half of the respondents (50%) said they felt well-informed about their rights as citizens of the European Union, a third (33%) did not feel very well-informed, and 16% did not feel at all informed.

Despite these advancements, EU citizenship continues to face significant challenges. One example is EU democratic participation itself. After being a non-issue for several decades, the role that citizens—and, more broadly, civil society—should play within the Union became central to the EU’s political discourse back in the late 1990s. In the 2000 Commission White Paper<sup>11</sup> on European Governance, citizen participation was recognised as one of the pillars of good governance, well beyond social policies. However, European Parliament election turnout has been historically significantly lower than national elections. The all-time high were the first elections, held 61.99%, starting a downward trend, reaching 42.61% in the 2014 Elections. Despite a slight improvement in voter turnout, the latest elections (June 2024) have barely reached a turnout of 51%. Due to its focus on participation of organised interests, the White Paper perceived participation in instrumental ways as a means of improving the efficiency and effectiveness of European policymaking, thus neglecting unorganised citizens.

6 Judgement of the Court of Justice of the European Union (8 March 2011). *Gerardo Ruiz Zambrano v Office national de l’emploi (ONEm)*. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62009CJ0034>

7 Judgement of the Court of Justice of the European Union (20 September 2001). *Rudy Grzelczyk v Centre Public d’Aide Sociale d’Ottignies-Louvain-la-Neuve*. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:61999CJ0184>

8 European Commission (2023). *EU Citizenship Report 2023. On progress towards effective EU citizenship*. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52023DC0931>

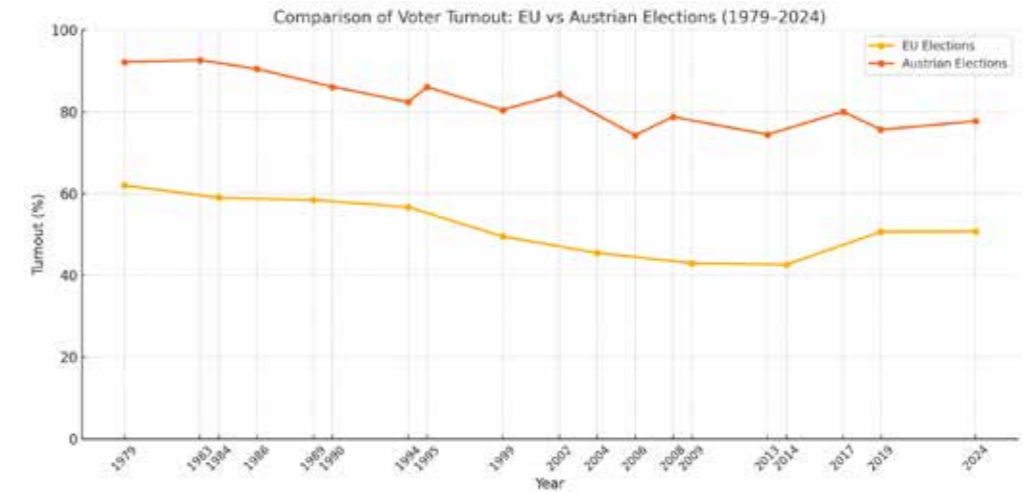
9 Konradshheim, M. (2023). ‘A Review of the European Union’s 30 Year-Long Existence’, *New Direction Reports*. Available at: <https://newdirection.online/2018-publications-pdf/NDReportEN-EU30.pdf>

10 Flash Eurobarometer FL528: *Citizenship and democracy*. Available at: [https://data.europa.eu/data/datasets/s2971\\_fl528\\_eng?locale=en](https://data.europa.eu/data/datasets/s2971_fl528_eng?locale=en)

11 European Commission (2001) *European Governance A White Paper*. Available at: [https://ec.europa.eu/commission/presscorner/detail/en/doc\\_01\\_10](https://ec.europa.eu/commission/presscorner/detail/en/doc_01_10)

Figure 1.

### Voter turnout (%) in EU elections since 1979



Source: Eurostat

Figure 1 compares voter turnout in EU elections and Austrian national elections from 1979 to 2024. It highlights a clear divergence in participation levels, with Austrian elections consistently achieving higher voter turnout compared to EU elections. The EU elections show a gradual decline from 1979 until 2014, followed by a slight recovery in the most recent elections, whereas Austrian elections maintain a higher but fluctuating turnout. This example showcases one of many—and most—EU member states national elections as compared to those of the European Union. The reason behind the choice of Austria as an example is this report’s focus on this country, as shown in the following chapters.

However, downstream from election turnout, there is a wide array of other instances where the EU participatory toolbox is still a work in progress. These include requests for access to documents of EU institutions, public consultations by the Commission, Complaints to the Commission or the European Ombudsman, and even visits to the EU institutions in Brussels, Luxembourg or Strasbourg.

Another persistent issue, as mentioned in Chapter 1, is that of “reverse discrimination,”<sup>12</sup> where nationals of a member state may face less favourable treatment compared to citizens of other EU countries within their own country. This shows the tension between national sovereignty and supranational rights, as member states retain control over granting national citizenship, which serves as the gateway to EU citizenship. The balance between free movement rights and member states’

control over their social welfare systems remains a contentious issue, as seen in various CJEU rulings.

In short in our days, the concept of EU citizenship grapples with broader political questions about its ultimate purpose. Is it a complementary layer to national citizenship, or does it signify a step towards a more unified European identity? This debate reflects the ongoing tension between the EU’s commitment to unity and its member states’ diverse identities and interests. The rise of populist and sovereigntist movements has further complicated this landscape, challenging the legitimacy and future of EU citizenship.

Academic scholarship has also been prolific in examining EU citizenship on this precise issue, offering diverse perspectives on the topic. Some scholars view EU citizenship as a pioneering model of post-national citizenship, emphasising its role in promoting a collective European identity and democratic participation beyond the nation-state. Others argue that EU citizenship is—or should be<sup>13,14</sup>—limited by its derivative nature (Van der Mei, 2018; or Baubök, 2014) and the dominance of economic considerations in its development, whereas others, such as Maas (2019) critique the latter arguing that the goal of creating European citizens has always been an essential element of the European project<sup>15</sup>, rather than an afterthought accidentally introduced in the Maastricht Treaty. This debate is of capital importance, as it ultimately affects the very core of the concept of sovereignty, which, in turn, brings democratic legitimacy, an issue where the CJEU’s jurisprudence has

12 EU citizenship has found a debate around the extent of rights granted to EU citizens, particularly concerning social benefits and the principle of non-discrimination.

13 Van der Mei, A.P. (2018). ‘EU Citizenship and Loss of Member State Nationality,’ *European papers: a journal on law and integration*, Vol. 3 (3), pp. 1319-1331.

14 Baubök, R. (2014). ‘The three levels of citizenship within the European Union,’ *German Law Journal*, 2014, Vol. 15 (5), pp. 751-764.

15 Maas W. (2014). ‘The Origins, Evolution, and Political Objectives of EU Citizenship.’ *German Law Journal*. Vol. 15 (5), pp. 797-819.

suggested that it must operate as a constantly evolving range of rights which impose their own complementary rules onto the initially autonomous idea of citizenship (Breskaya, 2020)<sup>16</sup>.

Looking ahead, the evolution of EU citizenship will likely continue to be influenced by political, social, and economic developments within the EU and globally. Also borrowed from the global scene and the West in particular, ongoing debates about sovereignty, identity, and the balance between national and supranational governance will play a crucial role in defining the future of EU citizenship.

Nevertheless, beyond overarching yet profound debates on EU citizenship, the element that can provide a better insight as to the nature of this concept is the policymaking that has been passed to implement it. This also sheds light on the *finalité politique* of EU citizenship and the success or room for improvement it has had since its inception over three decades ago. This is also an even more insightful endeavour if we are to look at citizenship policies across the EU in a comparative study.



3

## COMPARATIVE STUDY OF CITIZENSHIP POLICIES ACROSS THE EU

EU citizenship is a unique concept. If a person is a national of one of the 27 EU Member States, then that person is also automatically an EU citizen. A citizen can enjoy certain rights and benefits distinct from being an EU Member State national. What is more, these rights are valid in all 27 EU Member States.

In the paper – this report as well as the text of the law – the concept of EU citizenship might seem a principle erected with

solid foundations, however, as seen in the previous chapters, it is not an uncontested concept. As migration dynamics evolve and geopolitical tensions rise, EU citizenship policy has become increasingly scrutinised. The expanding scope and growth of supranational citizenship rights from workers to movers to citizens has also contributed to increased criticism, and questions regarding its inclusivity, effectiveness in fostering integration, and capacity to adapt to diverse socio-political challenges have sparked intense debate.

### 3.1. EU's Citizenship Policy Under Scrutiny. A Comparative Analysis

The EU's citizenship policy must be thus critically assessed by evaluating its strengths and weaknesses in addressing contemporary challenges. An assessment that affects at least three key areas. Namely, the inclusivity of EU citizenship, disparities in implementation across member states, and the role of citizenship policy in addressing migration and integration. Furthermore, all three areas encompass the underlying issue of whether there is a distinct EU identity and to what extent such identity is compatible with that of each EU member state.

#### Inclusivity of EU Citizenship. Disparities in Implementation Across Member States

A significant criticism of EU citizenship lies in its exclusivity, rooted in its derivative nature. EU citizenship can only be obtained by individuals who are nationals of a member state, leaving third-country nationals (TCNs) excluded from its benefits. This design excludes approximately 5.3% of the EU's population despite TCNs living, working, and contributing to member states' societies.

As Kostakopoulou (2024)<sup>17</sup> indicates, the TCNs – or non-EU citizens – in the EU has increased significantly. From 12 million people in the mid-1990s, there were 23.8 million resident non-EU citizens in 2023. These individuals face legal and practical barriers to achieving full rights, such as the ability to vote in national elections or enjoy the same freedom of movement as EU citizens.

Efforts like the Long-Term Residents Directive (2003/109/EC) have sought to bridge the gap by granting TCNs rights that approximate those of EU citizens. These rights include access to employment, education, and social security after five years of legal residence. However, the directive's effectiveness is limited due to the discretion afforded to member states in its implementation. This results in a fragmented landscape where access to long-term residency and subsequent rights varies widely. Additionally, naturalisation processes across the EU remain inconsistent, with some member states imposing rigorous requirements for language proficiency, income levels, and residency duration, which can marginalise vulnerable groups.

Although EU citizenship is a supranational construct, its practical application depends on the national policies of individual member states, leading to stark disparities – as seen in the previous section. These differences compromise the principle of equality central to EU citizenship and create fragmentation within the Union.

The disparity in naturalisation policies becomes evident when comparing specific countries. A good example is that of Germany and Italy. Germany's naturalisation framework, while focused on integration, is restrictive. Applicants must demonstrate eight years of residence, stable income, and language proficiency, requirements that often exclude marginalised populations, such as refugees or low-income migrants. By contrast, Italy has a shorter residency requirement of 10 years

<sup>16</sup> Breskaya, M. (2020). 'EU Citizenship as a derived status v. a quasi-independent source of rights: An overview of the CJEU's jurisprudence.' *Trans European Policy Studies Association (TEPSA) Briefs*. January 2020.

<sup>17</sup> Kostakopoulou, D. (2024). 'Third country nationals in the EU: From invisible others to potential key players in the European integration process.' *Columbia Journal of European Law*, 29 (3).

but struggles with bureaucratic inefficiency. Administrative delays and inconsistent enforcement frequently hinder TCNs' access to citizenship, leaving many in limbo for years.

Another example is that of France, for instance, which emphasises assimilation, requiring migrants to adopt cultural norms that often conflict with their religious or ethnic identities. This approach can marginalise individuals who wish to maintain their cultural heritage. In contrast, Sweden embraces multiculturalism, offering robust welfare support and initiatives to promote community engagement. Hungary represents a restrictive model, where policies discourage immigration and limit the integration of newcomers, reflecting a broader trend of Euroscepticism in the region. These varied approaches highlight how integration policies are shaped more by national political climates than by EU-wide frameworks, leaving migrants with unequal opportunities depending on where they reside.

The inclusivity or exclusivity of EU citizenship also underscores the limits of an EU identity that is inherently derivative of national citizenship. Some scholars have argued that EU citizenship “was designed not to replace national citizenship but to complement it,”<sup>18</sup> reflecting the inherently multi-level nature of identity within the Union (Maas, 2008). The exclusion of TCNs also raises questions about the EU's commitment to multiculturalism as a core component of its identity.

Other scholars have noted that the concept of a European identity often relies on an implicit “othering” of non-Europeans, positioning them as outsiders who must be integrated into a pre-existing cultural framework (Balibar, 2004).<sup>19</sup> This dynamic is evident in the treatment of TCNs, who are often subject to integration policies that emphasise assimilation into national cultures rather than the creation of a genuinely inclusive European identity.

Freedom of movement, a cornerstone of EU citizenship, is also unevenly realised. While EU citizens are guaranteed this right, marginalised groups, such as the Roma, face systemic discrimination that impedes their access to housing, employment, and education. This creates a paradox where some EU citizens do not fully enjoy the rights associated with their citizenship due to societal and institutional biases in host countries. Similarly, TCNs encounter restrictions that limit their mobility across the Union, reinforcing their exclusion from the full benefits of EU integration.

The uneven enforcement of EU directives further exacerbates disparities. For example, the Family Reunification Directive (2003/86/EC)<sup>20</sup> allows TCNs to bring family members to the EU, but its implementation varies widely. The Netherlands applies stringent income thresholds that disproportionately affect low-income migrants, while Belgium or Spain adopt more lenient criteria, providing greater opportunities for family reunification. These disparities not only undermine the rights of TCNs but also reflect the broader challenge of creating a uniform and cohesive EU identity that is meaningful and enforceable across all member states, reflecting a patchwork of rights contingent on national interpretations.

### Addressing Migration and Integration Through Citizenship Policy

Migration and integration are critical tests of EU citizenship's effectiveness. While the EU has introduced measures to address these challenges, significant gaps remain, reflecting broader tensions between national sovereignty and supranational policy.

The EU Action Plan on Integration and Inclusion (2021–2027)<sup>21</sup> exemplifies the Union's commitment to fostering integration through education, employment, housing, and healthcare initiatives. However, its success is contingent on the cooperation of member states, many of which prioritise national control over immigration policies. This reluctance stems from cultural and political resistance to EU-wide solutions such as the Asylum, Migration and Integration Fund (AMIF)<sup>22</sup>. Many states perceive the promotion of European values as a threat to their national identities, complicating efforts to develop a unified integration strategy.

Populism and Euroscepticism further challenge the implementation of inclusive policies. Populist movements often frame migrants as threats to social cohesion and economic stability, using anti-migration rhetoric to bolster nationalist agendas. These narratives create political climates where integration policies are scaled back or designed to exclude rather than include, undermining the principles of EU citizenship.

Austria's approach to religious integration highlights these tensions. Proponents of the Austrian model have praised the country's policy requiring mosque sermons to be delivered in German as a tool for promoting linguistic and cultural integration. Critics, however, argue that it infringes on religious freedoms and targets Muslim communities disproportionately.

This case illustrates the broader conflict between national integration goals and EU principles of inclusivity and non-discrimination. It also illustrates the wider conflict between national identity and the EU's supranational identity, as member states pursue integration strategies that reflect their cultural priorities rather than a shared European vision.

As can be seen, the inclusivity, disparities, and migration policies associated with EU citizenship reveal the deep-seated tensions between a distinct EU identity and the diverse national identities of its member states. While EU citizenship was envisioned as a unifying and homogenising force, its implementation highlights the challenges of creating a cohesive identity in a union of nations with different cultural, political, and historical contexts. These challenges underscore the need for a more inclusive and coherent approach to EU citizenship, one that can reconcile the Union's supranational aspirations with the realities of national diversity. Without addressing these tensions, the promise of a shared European identity will remain unfulfilled.

The inclusivity of EU citizenship, therefore, remains constrained by national policy disparities and sociopolitical resistance to integration. Addressing this major challenge will require either a stronger EU-level framework and a commitment from member states to align their national policies with the values of equality and inclusivity that underpin the EU, or, by contrast, it will require a notion of EU citizenship, which is more aligned to the shared values and principles of EU member states.

In other words, must EU citizenship be a top-down Brussels-led effort to overcome national identities and melt them into an artificial supranational identity? Or should this be a bottom-up effort by EU member states to agree on a shared vision and endow every EU citizen with a set of rights and freedoms that all commit to respect in their respective countries regardless of the person's passport, provided it is an EU member state passport? That is the EU's main fault line regarding EU citizenship and overall EU integration and convergence.

<sup>18</sup> Maas, W. (2008). 'Migrants, states, and EU citizenship's unfulfilled promise', *Citizenship Studies*, 12 (6), pp. 583-596.

<sup>19</sup> Balibar, É. (2004). *We, the People of Europe?: Reflections on Transnational Citizenship*. Princeton University Press.

<sup>20</sup> European Commission. *Family Reunification*. Available at: [https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-resettlement-and-integration/family-reunification\\_en](https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-resettlement-and-integration/family-reunification_en)

<sup>21</sup> European Commission. *Action plan on integration and inclusion*. Available at: [https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-resettlement-and-integration/integration/action-plan-integration-and-inclusion\\_en](https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-resettlement-and-integration/integration/action-plan-integration-and-inclusion_en)

<sup>22</sup> European Court of Auditors (2024). 'Integration of third-country nationals in the EU – Relevant support from the Asylum, Migration and Integration Fund but its impact could not yet be demonstrated'. *Special report 26/2024*. Available at: <https://www.eca.europa.eu/en/publications/SR-2024-26>

## Case Study

# AUSTRIA'S INTEGRATION POLICY AND THE CHALLENGES OF MIGRATION

Austria's policies on religious integration, citizenship, and migrant inclusion are emblematic of the complexities inherent in European Union (EU) citizenship. They provide a vivid example of how national policies must navigate tensions between cultural sovereignty and supranational values. As a small yet influential member state, Austria exemplifies both the potential and the challenges of fostering social cohesion within the EU framework. To contextualise Austria's role, it is crucial to examine its policies

in light of its historical, cultural, and political ties to the German-speaking EU, especially Germany, which has played a pivotal role in shaping European approaches to democratic education and integration in the post-World War II era.

Therefore, to fully understand Austria's approach, it is essential first to examine the broader context of the German-speaking EU, particularly Germany's emphasis on democratic education.

### 4.1. The German-Speaking EU: Education and Democratic Values

After the fall of the Third Reich in 1945, Germany undertook a comprehensive effort to rebuild its political and social institutions around democratic principles. German political foundations (*Stiftungen*) such as the Konrad-Adenauer-Stiftung (KAS), Friedrich Naumann Stiftung (FNF), Hans Seidel Stiftung (NSS), or Friedrich-Ebert-Stiftung (FES) play a significant role in fostering democratic principles, civic education, and European integration<sup>23</sup>. These foundations emerged from the historical and political necessity to ensure that the horrors of the Third Reich and authoritarianism would not be repeated in Germany. Their work reflects a deep commitment to embedding the principles of liberal democracy in German and international contexts—they have a broad presence across the world, ranging from Latin America to Africa to Southeast Asia<sup>24</sup>.

These foundations were established explicitly to promote liberal democratic values through civic education, and prevent the repetition of Germany's past authoritarian mistakes. The role of these foundations is to promote civic education<sup>25</sup>, encourage active citizenship, prevent authoritarian relapse and support global democratic development<sup>26</sup>. In essence, they are deeply embedded in political education through civic

engagement, youth programmes and historical reflection.

This model is unique to Germany, and no other country has such a comprehensive network of publicly funded political foundations with global reach. The funding for these foundations comes almost entirely from public funds provided by the German federal government. These funds are allocated based on the proportional representation of political parties in the German Bundestag (parliament)—collectively, German political foundations receive substantial funding. In recent years, their combined budgets have exceeded €600 million annually, of which around €100 are spent overseas.

As for Austria, this country has drawn heavily from Germany's tradition, incorporating similar initiatives into its national policies<sup>27</sup>. Both countries prioritise civic education and democratic engagement, stemming from their shared post-war experiences and the imperative to prevent the re-emergence of authoritarianism. However, the German model is far more extensive and institutionalised, while Austria's approach is comparatively more restrained and shaped by its smaller scale and unique historical context.

<sup>23</sup> Adick, C. & Giesemann, M. (2015). 'Relevance of German Political Foundations for Comparative Educational Research.' *Journal of Education and Research*, 5 (1) 7.

<sup>24</sup> For example, the Konrad-Adenauer-Stiftung (aligned with the Christian Democratic Union) operates in over 120 countries, focusing on governance, democracy, and European integration, and the Friedrich-Ebert-Stiftung (aligned with the Social Democratic Party) has over 100 offices worldwide, working with trade unions, political parties, and civil society groups to promote social democracy and economic justice.

<sup>25</sup> Facts About Germany, Political foundations. Available at: <https://www.tatsachen-ueber-deutschland.de/en/political-foundations?utm>

<sup>26</sup> D+C (2017). Promoting Democratic Values. Available at: <https://www.dandc.eu/en/article/germanys-political-foundations-are-unique-world-over?utm>

<sup>27</sup> For instance, Holocaust education is part of history instruction and is also part of other courses such as civics. Similarly, the law bans neo-Nazi activity and prohibits public denial, belittlement, approval, or justification of the Holocaust or other Nazi crimes against humanity in print, broadcast, and other media. According to the Interior Ministry, 1,671 cases were reported under the law in 2021. According to the Justice Ministry, the government convicted 222 persons under the law in 2022, approximately the same as the 226 convictions in 2021.

## 4.2. Citizenship and Naturalisation in Austria: Maintaining Social Cohesion

Much like Germany, Austria incorporates civic education into their political frameworks as a response to the lessons of the Nazi era, focusing on safeguarding democracy through informed and engaged citizenry. Also, like Germany, Austria has political foundations affiliated with major political parties. These foundations, such as the Renner Institute (affiliated with the Social Democratic Party of Austria), the Freiheitliches Bildungsinstitut (affiliated with the Freedom Party of Austria) or the Political Academy of the Austrian People's Party, are tasked with promoting political education and research.

Austria also emphasises the role of education in building democratic resilience. The Integration Act of 2017 (*Integrationsgesetz*)<sup>28</sup> regulates the central framework and sets key elements for the successful integration of those who settle in Austria long term, including refugees<sup>29</sup>. Among other measures, it mandates German language and civic education courses for newly arrived migrants, emphasising Austrian laws, values, and cultural norms. While these measures aim to equip migrants with the tools needed for integration, they also reflect Austria's cautious approach to multiculturalism, prioritising cultural assimilation over preserving diversity (MIPEX, 2020).<sup>30</sup>

However, this emphasis on education also highlights the potential for fostering a shared European identity. As Jubany and Mayblin (2024)<sup>31</sup> argue, education is a critical tool for addressing the exclusionary tendencies of national citizenship models, promoting instead a vision of belonging that aligns with EU principles of equality and inclusion.

Austria's strict naturalisation policies reflect a broader effort to maintain social cohesion in the face of increasing migration. The Austrian Citizenship Act (*Staatsbürgerschaftsgesetz, StbG*)<sup>32</sup>, which outlines the requirements, processes, and rights associated with acquiring and retaining Austrian citizenship, imposes rigorous criteria, including a ten-year residency requirement, language proficiency, and proof of economic

independence. It is one of the most restrictive naturalisation frameworks in the European Union, emphasising long-term residence, cultural integration, and national loyalty, measures that ensure that those seeking Austrian citizenship are fully integrated into the cultural and economic fabric of the nation. This is all the more necessary in light of the growing number of non-Austrians living in the country, from other EU member states but particularly those coming from third countries — outside the EU.

In 2021, Austria granted citizenship to just 0.7% of its population<sup>33</sup>, compared to the EU average of 1.4%. This low rate highlights Austria's commitment to preserving the exclusivity of its citizenship, reserving it for individuals who demonstrate genuine integration and a long-term commitment to the country. Critics often highlight the restrictive nature of these policies<sup>34</sup>, particularly their impact on third-country nationals (TCNs). Still, from a national perspective, these restrictions are necessary to prevent overburdening social systems and diluting national identity.

As of 1 January 2023, there were about 842,600 TCNs, representing 9.3% of the population, and another 867,400 EU citizens (9.5%) living in Austria at the time. According to Statistics Austria<sup>35</sup>, a small increase in the percentage of TCNs is observed each year over the last 5 years, with the share of TCNs standing at 7.9% in 2019.

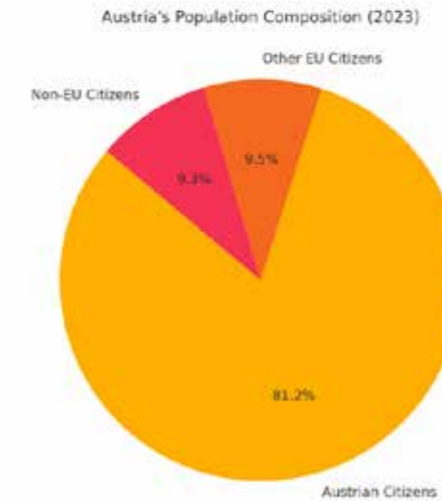
According to Statistics Austria data<sup>36</sup> from 2022, 42.6% of all TCNs living in Austria have valid permanent residence permits, and 23.57% are temporary residents who most often come to the country to unite with family members or study. The rest includes asylum seekers (3.8%), as well as beneficiaries of international protection and seasonal workers (the latter two representing 27.8% of all TCNs). Finally, 16.8% of all TCNs were born in Austria. In 2022, 10,899 TCNs and European citizens living in Austria were naturalised, with the naturalisation rate reaching 0.7%. Regarding origin, Statistics Austria also notes that the largest groups among TCNs include Serbian (121 916)

and Turkish nationals (119,706). This may be due to the targeted recruitment of workers from the former Yugoslavia and Turkey in the late 1960s and at the beginning of the 1970s.

By the end of March 2024, Austria also counted a total of 73,010 non-EU citizens who had fled the war and were under

temporary protection. Unlike countries such as Sweden, which naturalised over 89,000 individuals in 2021, Austria has taken a cautious approach, prioritising cultural assimilation over mass integration. This approach aligns with growing public concerns about the strain that unchecked migration places on housing, employment, and social services.

Figure 2. Distribution of Austria's Population (2023)

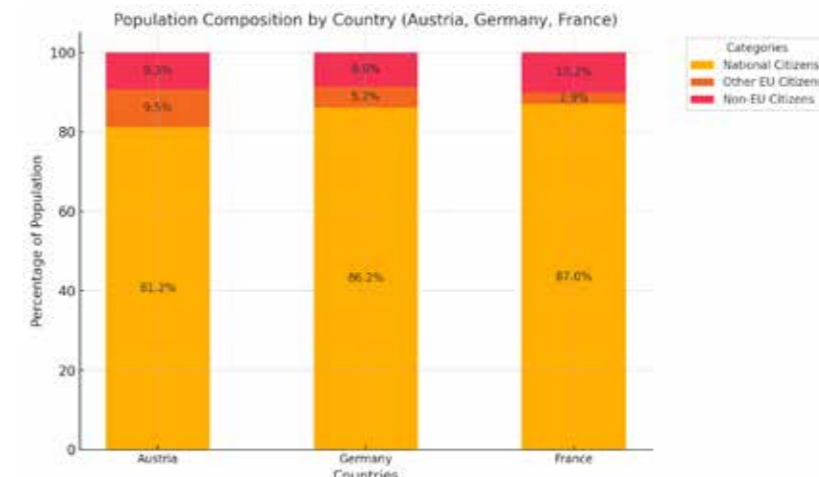


Source: Eurostat and Austria's Statistics Office

As of 2023, Austria's total population stands at 8,936,000, with Austrian citizens making up the majority at approximately 81.2%. Other EU citizens account for 9.5% (867,400), while non-EU citizens, or TCNs, represent 9.3% (842,600) of the population. Among non-EU citizens, 42.6% hold permanent residence permits, 23.6% are temporary residents (e.g., for family reunification or studies), and the remainder include asylum seekers and seasonal workers. Notably, about 16.8% of non-EU citizens were born in Austria. Over the past five years, the share of non-EU citizens has shown a slight annual increase, reflecting Austria's evolving demographic landscape towards a more heterogeneous future.

The population composition of Austria reveals some notable differences from neighbouring countries with a long history of being welcoming of migration waves, such as Germany or France. In Austria, national citizens constitute 81.2% of the population, followed by 9.5% other EU citizens and 9.3% non-EU citizens. Germany exhibits a higher proportion of national citizens at 86.2%, with 5.2% being other EU citizens and 8.6% non-EU citizens. France has the highest percentage of national citizens among the three countries, at 87.0%, but a relatively low proportion of other EU citizens, at 2.9%, while non-EU citizens account for 10.2% of its population.

Figure 3. Distribution of the Population of France, Germany and Austria (2023)



Source: Eurostat

28 68th Federal Act enacting an Integration Act (IntG, Integrationsgesetz). Federal Law Gazette I (8 June 2017). No. 68. Available at: [https://www.bmeia.gv.at/fileadmin/user\\_upload/Zentrale/Integration/Integrationsgesetz/20171006\\_IntG\\_Gesetzestext\\_Uebersetzung\\_final.pdf](https://www.bmeia.gv.at/fileadmin/user_upload/Zentrale/Integration/Integrationsgesetz/20171006_IntG_Gesetzestext_Uebersetzung_final.pdf)

29 European Commission. Governance of migrant integration in Austria. Available at: [https://migrant-integration.ec.europa.eu/country-governance/governance/austria\\_en](https://migrant-integration.ec.europa.eu/country-governance/governance/austria_en)

30 Migrant Integration Policy Index (2020). Austria. Available at: [https://www.mipex.eu/austria#:~:text=Scoring%2046%20on%20the%20MIPEX,and%20OECD%20country%20\(56\)](https://www.mipex.eu/austria#:~:text=Scoring%2046%20on%20the%20MIPEX,and%20OECD%20country%20(56)).

31 Jubany, O. & Mayblin, L. (2024). 'Asylum, welfare and colonialism in Europe: Who belongs, and who deserves?,' *Social Sciences*, 13 (11), pp. 620.

32 Austrian Citizenship Act ("Staatsbürgerschaftsgesetz/StbG"). Citizenship for Persecuted Persons and their Direct Descendants. Available at: <https://www.bmeia.gv.at/en/austrian-embassy-tel-aviv/service-for-citizens/citizenship-for-persecuted-persons-and-their-direct-descendants>

33 Austrian Ministry of Interior, 2021

34 Resterica, B. (2024). 'Austria Among EU Countries With Toughest Citizenship Rules', *Schengen News* (28 October 2024). Available at: <https://schengen.news/austria-among-eu-countries-with-toughest-citizenship-rules/>

35 Statistics Austria. Migration and Naturalisation. Available at: <https://www.statistik.at/en/statistics/population-and-society/population/migration-and-naturalisation>

36 Statisches Jahrbuch (2022). Migration and Integration. Zahlen Daten Indikatoren. Available at: [https://www.statistik.at/fileadmin/publications/Migration\\_Integration\\_2022.pdf](https://www.statistik.at/fileadmin/publications/Migration_Integration_2022.pdf)

These two figures underscore the diversity in population structures across countries, reflecting how specific the Austrian case is. A demographic reality that is intimately attached to the Austrian way of approaching citizenship, migration and integration.

Apart from the growing presence of migrants in Austria, as of 2024, Austria is also among the top five EU countries when it comes to the number of refugees and asylum seekers per 1,000 citizens (32,9) that live in the country. Over the past few years, Austria has been among the primary receivers of migrants for several years now and is, therefore, in a continuous struggle and effort to develop a better integration policy, a topic which also permanently dominates the political landscape like no other.<sup>37</sup>

### Austria's Pathway for Citizenship

In that regard, and by contrast to most EU member states, Austrian citizenship represents more than just a legal status; it is a gateway to participation in Austrian society –and, by extension, the European Union (EU). Austrian citizenship is typically acquired through descent rather than birthright on Austrian soil, aligning with the principle of *jus sanguinis*. This means that children born to at least one Austrian parent are automatically entitled to Austrian citizenship, regardless of where they are born. In contrast, children born in Austria to non-Austrian parents are not granted citizenship at birth. This policy underscores Austria's focus on heritage and familial ties over territorial presence, reinforcing a narrow definition of national belonging.

For migrants, naturalisation –the process of acquiring Austrian citizenship– is far from automatic. The pathway is intentionally designed to emphasise integration and demonstrate a deep commitment to Austrian society. As mentioned before, applicants must meet strict residency requirements, typically a continuous presence in Austria for at least ten years. However, six-year reduced residency periods apply to certain groups, such as citizens of other EU or European Economic Area (EEA) member states, recognised refugees, and individuals who have made exceptional contributions to Austria in areas like science, arts, or sports.

Beyond residency, applicants must also demonstrate economic self-sufficiency, a clean criminal record, and proficiency in the German language at a B1 level under the Common European Framework of Reference for Languages. These requirements aim to ensure that new citizens can actively participate in Austrian society and contribute to its cultural and economic fabric. Additionally, applicants must complete the Integration Agreement, which includes mandatory courses on Austrian laws, values, and the German language, as well as pass a citizenship test that evaluates their understanding of Austrian history, democracy, and governance.

Austria's approach to naturalisation is also notable for its insistence on renunciation of previous citizenship, as dual citizenship is generally prohibited except under specific circumstances, such as for children born with dual nationalities or individuals granted citizenship for extraordinary achievements. This restriction reflects Austria's desire to preserve loyalty to the nation-state while avoiding divided allegiances. This stance complicates the integration of migrants who may wish to retain connections to their countries of origin.

However, as mentioned above, Austrian citizenship does not exist in isolation. It comes with the additional privilege of EU citizenship. This status grants Austrians the right to live, work, and travel freely across all EU member states, as well as the ability to vote in European Parliament elections. However, the strict conditions imposed by Austria on naturalisation mean that access to EU citizenship –and the freedoms it entails– is very limited for many migrants.

For example, migrants who meet the criteria for long-term residence in Austria often find themselves unable to fulfil the requirements for naturalisation, particularly the stringent income thresholds and language demands. As a result, they remain excluded not only from the political and social rights of Austrian citizenship but also from the broader benefits of EU citizenship. This creates a tiered system of belonging, where some individuals enjoy the full spectrum of rights associated with EU citizenship. In contrast, others, particularly third-country nationals (TCNs), are left on the periphery.

Moreover, Austria's restrictive approach to naturalisation reflects a broader tension within the EU framework, where national policies on citizenship and migration intersect with supranational principles of inclusivity and mobility. While the EU has sought to harmonise certain aspects of migration policy through directives like the Long-Term Residents Directive, individual member states retain significant discretion over who qualifies for citizenship, leading to disparities in access and rights across the Union.

Josipovic and Reeger (2020)<sup>38</sup> note that Austria's policies serve as a model for other EU countries grappling with similar challenges, demonstrating how to manage migration without compromising national sovereignty. Austria's restrictive citizenship regime reflects broader debates within the EU about the balance between national sovereignty and supranational integration. While EU citizenship is often seen as a step toward a more inclusive European identity, the reality remains that access to this status is mediated by national governments, each with its criteria and priorities. Austria's emphasis on cultural assimilation and economic self-sufficiency underscores the persistent influence of national identity in shaping access to European rights.

The Austrian Citizenship Act serves as both a bridge and a barrier in this context. On one hand, it connects Austria to the EU's ideals of mobility, democracy, and inclusion. On the other hand, its restrictive provisions highlight the limitations of these ideals, particularly for migrants who remain excluded from full participation in both Austrian and European life.

As has been shown, in Austria, citizenship and integration are intricately linked, forming a reciprocal relationship where successful integration is viewed as a prerequisite for acquiring citizenship while attaining citizenship is seen as the ultimate marker of full integration. This connection is rooted in Austria's broader socio-political framework, which emphasises cultural cohesion, national loyalty, and the responsibilities of migrants within Austrian society.

In short, citizenship is the ultimate goal of integration, which should be the end goal of migration. That is the case in every EU member state, particularly Austria. Let us, therefore, examine Austria's integration model.

### Austria's Integration Model. A Call for the EU to Follow

Integration in Austria is understood as a two-way process necessitating both the adequate provision of services from the state and the active participation of migrants. Thus, special focus is placed on voluntary engagement, which is meant to help migrants get involved in Austrian society while improving their German language skills, gathering practical experience within the labour market and creating contacts.

Austria set up a National Action Plan for Integration in 2010.<sup>39</sup> The same strategic document continues to guide its integration efforts today. It was designed by the Federal Ministry of the Interior in cooperation with a steering group comprising other relevant ministries, local authorities, researchers and civil society organisations. This action plan mentions an array of topics, including language and education, work and employment, the rule of law, cultural values, intercultural dialogue, health and social issues, sports and leisure, as well as housing.

In addition to this overarching plan, some other more targeted integration plans focus on specific topics or population groups. A 50-Points-Plan towards integration of beneficiaries of international protection<sup>40</sup> was published in 2016 in reaction to the increased numbers of beneficiaries of international protection arriving in 2016.

The above-mentioned Integration Act of 2017 regulates the central framework for integrating those who settle in Austria long term. This is Austria's primary legal framework for

promoting the integration of migrants, particularly those who plan to settle in the country long term. It is built on the principle that successful integration is a two-way process, requiring both structural support from the government and active participation by migrants. The Act encompasses mandatory measures designed to foster linguistic, cultural, and economic integration, ensuring that migrants are equipped to contribute to and participate fully in Austrian society.

In 2018, Austria implemented a model to increase language proficiency (Deutschfördermodell) among children and young adults. This model gives pupils who do not yet fulfil the required German level the status of “extraordinary” students, which makes them eligible to four to six semesters of extracurricular support to achieve full language proficiency. The goal of the program is to be able to integrate extraordinary students as fast as possible into the regular school environment.<sup>41</sup>

However, due to yet another new rise of migrants in the country, the task remains a challenge. As recently as November 2024, it was reported that more than 14% of elementary school pupils in Vienna are not able to understand their teachers due to a lack of German proficiency. The government is again struggling to adapt to the increasing number of new migrants from Ukraine and Syria that came into the country in recent times. German language classes and teaching personnel are being increased not just in Vienna but in the whole country. The political right is also advocating for an additional year of kindergarten if children do not fulfil the language criteria.<sup>42</sup>

As can be seen, the active participation of migrants is a fundamental prerequisite to successful integration from Austria's standpoint.

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### Key provisions of the Integration Act are:

- Mandatory language and civic education courses: Migrants are required to complete German language courses up to at least A2 level (basic user proficiency), ensuring their ability to communicate effectively in everyday settings. Civic education courses cover Austrian values, laws, and cultural norms, such as gender equality, democracy, and the rule of law, helping migrants navigate their new environment and understand the country's social framework.**
- Integration agreement: Migrants must sign an integration agreement that commits them to**

37 Statista (2024) Available at: <https://de.statista.com/infografik/18439/fluechtlinge-und-asylbewerber-in-eu-laendern/>

38 Josipovic, I. & Reeger, U. (2020). 'Integration Policies, Practices and Experiences', Austria Country Report [Paper 2020/55], June 2020. Available at: [https://www.ecoi.net/en/file/local/2032749/WP5\\_Austria+Country+Report\\_Integration.pdf](https://www.ecoi.net/en/file/local/2032749/WP5_Austria+Country+Report_Integration.pdf)

39 Nationaler Aktionsplan für Integration. Available at: [https://migrant-integration.ec.europa.eu/sites/default/files/2010-01/doc1\\_11751\\_148001025.pdf](https://migrant-integration.ec.europa.eu/sites/default/files/2010-01/doc1_11751_148001025.pdf)

40 Federal Ministry Republic of Austria (2016). '50 Action Points Plan for Integration Adopted by the Council of Ministers', European and International Affairs. Available at: <https://www.bmeia.gv.at/ministerium/presse/aktuelles/2016/01/50-punkte-plan-im-ministerrat-angenommen/>

41 Bundeskanzleramt (2024) Available at: <https://www.bundeskanzleramt.gv.at/dam/jcr:698ca2f5-e450-4c1c-b1eb-ef66b4ba0c78/ib2024-de-web.pdf>, pp.37f.

42 Die Presse (2024). 14,8 Prozent der Schüler in Wien verstehen den Unterricht nicht. Available at: <https://www.diepresse.com/19038768/148-prozent-der-schueler-in-wien-verstehen-den-unterricht-nicht>

fulfill specific integration measures within two years of their arrival. These measures primarily include the mandatory courses and active efforts to participate in the labor market or community life.

3. **Integration Year program:** Beneficiaries of asylum and subsidiary protection are required to participate in the Integration Year Program (Integrationsjahr), which provides language training, vocational education, and employment preparation. This program is aimed at improving migrants' job prospects while addressing Austria's labor market needs.
4. **Sanctions for non-compliance:** Failure to comply with integration requirements can result in penalties, such as the reduction or withdrawal of social benefits, emphasizing the Austrian government's stance on integration as a shared responsibility.

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Another key component of Austria's integration mechanism is the Austrian Integration Fund (*Österreichischer Integrationsfonds* or ÖIF)<sup>43</sup>. tasked with implementing Austria's integration policies in practice. Founded in 1960 and originally aimed at supporting refugees, ÖIF has evolved into a comprehensive integration agency, working closely with government institutions, NGOs, and private sector organisations. Through its nine integration centres based in the provincial capitals, ÖIF offers integration services and information to beneficiaries of asylum and subsidiary protection, as well as to migrants.

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**Core responsibilities and services of the ÖIF are:**

1. **Integration centers across Austria:** ÖIF operates nine integration centers located in provincial capitals, serving as hubs for delivering integration-related services and support to migrants. These centers provide a direct link between migrants and the resources they need for successful integration. Services include language assessments, registration for integration courses, and guidance on accessing housing, education, and employment opportunities.
2. **Language training:** ÖIF oversees and subsidizes language training programs for migrants, ensuring they meet the linguistic requirements outlined in the Integration Act. Language courses are tailored to different levels, from basic communication (A1) to more advanced proficiency (B2) for those entering the workforce.

3. **Civic education and orientation:** The fund conducts orientation sessions that educate migrants on Austrian values, legal systems, and cultural practices. These sessions include interactive workshops, video materials, and case studies designed to foster cultural understanding and social cohesion.
4. **Support for asylum seekers and subsidiary protection beneficiaries:** ÖIF provides targeted support to refugees and individuals with subsidiary protection, including counseling services, vocational training, and assistance in accessing housing and healthcare. These services aim to help beneficiaries rebuild their lives and integrate into Austrian society effectively.
5. **Employer partnerships:** ÖIF works closely with Austrian businesses to connect migrants with job opportunities and training programs. This collaboration ensures that integration efforts are aligned with Austria's economic priorities, particularly in addressing labor shortages in sectors such as healthcare, manufacturing, and IT.
6. **Monitoring and evaluation:** The fund collects and analyzes data on integration progress, providing regular reports to policymakers. This monitoring helps assess the effectiveness of Austria's integration policies and identify areas for improvement.

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In essence, the Integration Act provides the legal framework and policy direction for integration, while the ÖIF translates these policies into actionable programs and services. Together, they create a cohesive system that balances the government's expectations of migrants with the necessary support to help them succeed. They also work together on several action points. One example is language and cultural education. The Integration Act mandates language and civic education, and ÖIF ensures that migrants have access to high-quality courses and resources.

They also present some synergies in labour market integration. The Integration Year Program under the Act is supported by ÖIF's partnerships with employers and vocational training institutions, creating pathways for migrants to find meaningful employment. Finally, regarding accountability and compliance, ÖIF plays a critical role in monitoring compliance with integration requirements, reporting progress, and identifying challenges in meeting the Act's objectives.

The Integration Act of 2017 and the Austrian Integration Fund (ÖIF) represent a comprehensive and coordinated

approach to integration in Austria. Together, they create a structured pathway for migrants to become active, contributing members of society while addressing Austria's economic and social needs. However, they also face strong criticism.

Critics argue that the stringent requirements and penalties for non-compliance place undue pressure on migrants, especially those from vulnerable backgrounds who may struggle with language learning or cultural adaptation. Moreover, the growing number of migrants and refugees, particularly during crises, has stretched ÖIF's capacity, leading to long waiting times for courses and services in some areas.<sup>44</sup>

### 4.3. Religious Integration and the Islam Law of 2015

As examined in the previous sections, the pathway to citizenship and integration has much to do with migration. In particular, the growing influx of Muslims into Europe. This is true of much of the EU, especially the French-speaking (France and Belgium) and German-speaking (Germany and Austria) member states.

The legal status of Muslims in Austria is unique in Europe. As the centre of the Austro-Hungarian Empire, Austria closely related to Islamic populations in the Balkans for many years<sup>45</sup>. With this history, Austria's relations with Islam as a religion have been relatively unproblematic compared to other European countries. A law of 1867 guaranteed respect for all religions throughout the empire, giving Muslims the right to establish mosques and practice their faith. Historically, Muslims also occupied good positions within the Austrian civil service, and the first mosque was already built in Vienna in 1887 with the government's assistance to service Muslims enlisted in the Austrian army.

Islam, in particular, was recognised constitutionally as a religion after the parliamentary treatment in the Upper Chamber and Lower House in 1912. The Islam Law (Islamgesetz), issued by Emperor Franz Joseph I, concerned the acknowledgement of Islam's followers within the Austrian half of the empire. In 1979, this Islam Law of 1912 was the basis for the recognition of Islam as a corporation of public law, in which also the proclamation of a Constitution of the Islamic Religious Body and the establishment of the first Viennese Islamic Religious Community was announced (Anerkennungsgesetz; "Act of Recognition"). According to Article 1 of the Constitution, all Muslims in Austria belong to the Religious Body<sup>46</sup>.

Despite these criticisms and challenges, Austria's collaborative framework serves as a model for other countries seeking to balance the demands of integration with the realities of migration and cultural diversity. It also represents a very clear decision as to prioritising cultural assimilation over fostering a multicultural society. The emphasis on adopting Austrian values has been criticised as exclusionary by migrant advocacy groups. However, that shows where the dividing line is regarding EU citizenship. The crossroads seems to be clear at this point. One road is the pursuit of multiculturalism as a new identity. The other is a notion of EU citizenship that is compatible with –and emanates from, or is derivative of– national identity and national sovereignty.

Since Islam was legally established in Austria in 1912, the Muslim community has legal representation in the state. Anchored in the historical context at the beginning of the last century, the statutory basis and, thus, the equality of Islam to other legally acknowledged religious communities have successfully met the demands of modern labour migration and immigration of Muslims.

Muslims also have their own civil society organic bodies, such as the Islamic Religious Community in Austria (IGGiÖ). As mentioned above, established in 1979, it represents Muslims and oversees religious education and cultural practices. IGGiÖ reserves the right to deal with central aspects of the Muslim community. These include the examination and recognition of the qualifications of Islamic religion teachers at public schools as well as of imams in mosque organisations. About 200 Muslim teachers teach Islamic religious classes (introduced in the school year 1982/83) to some 40,000 children. The Austrian state pays the teachers' salaries.

The Islamic Pedagogical Academy (IRPA), founded by the IGGiÖ, opened its doors in 1998. Under Austrian public law, the IRPA is a private school and educational institution for religion teachers. It was founded out of the practical necessity of training qualified and pedagogically well-versed Islamic religion teachers who, above all, have a command of the German language. The public relations work and services of the IGGiÖ were increasingly expanded and professionalised in the 1990s; thus, the central position of the IGGiÖ seems to have been brought to the greater notice of Muslims in Austria as well as the general public.<sup>47</sup>

44 Vorarlberger Nachrichten (2024). Available at: <https://www.vn.at/vorarlberg/2023/10/02/langes-warten-auf-deutschkurse.vn>

45 Federal Ministry for European and International Affairs (2012). *100 Years of Austrian Legislation on Islam*. Available at: [https://www.bmeia.gv.at/fileadmin/user\\_upload/Zentrale/Kultur/Publikationen/Islamgesetz\\_EN.pdf](https://www.bmeia.gv.at/fileadmin/user_upload/Zentrale/Kultur/Publikationen/Islamgesetz_EN.pdf)

46 Euro-Islam.Info. Austria. Available at: <https://www.euro-islam.info/country-profiles/austria/#f5-479>

47 Austria Federal Ministry for Foreign Affairs (2005). *Muslims in Austria, in their homelands, and living together in the new Europe*. Available at: [https://www.bmeia.gv.at/fileadmin/user\\_upload/Zentrale/Publikationen/muslims\\_in\\_austria.pdf](https://www.bmeia.gv.at/fileadmin/user_upload/Zentrale/Publikationen/muslims_in_austria.pdf)

43 Austrian Integration Fund. Available at: <https://www.integrationsfonds.at>

As exemplified by the work of the IGGiÖ, Muslims in Austria also enjoy a large degree of autonomy, as Islam enjoys “inner autonomy” due to its legal status –i.e., as long as there is

no infringement of Austrian laws, the state has no right to “interfere” in the religious affairs of the Islamic community.

**Table 1. Muslim Population in Austria (absolute terms and share of the total population)**

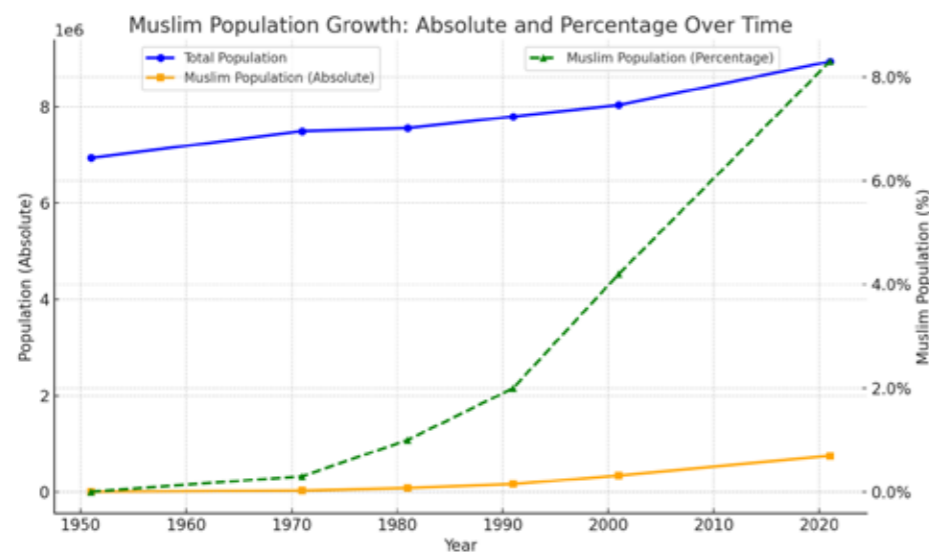
YEAR	TOTAL POPULATION	MUSLIM POPULATION (ABSOLUTE)	MUSLIM POPULATION (PERCENTAGE)
1951	6,933,905	N/A	N/A
1971	7,491,526	22,267	0.3%
1981	7,555,338	76,939	1.0%
1991	7,795,786	158,776	2.0%
2001	8,032,926	338,988	4.2%
2021	8,936,000	746,000	8.3%

Source: Statistics Austria. Religious Denominations<sup>48</sup>

Today, Muslims account for nearly 9% of Austria’s population, the largest religious minority, with significant groups from Turkey and Bosnia-Herzegovina. Migration increased during

labour shortages in the 1960s due to conflicts in the Balkans and the Middle East and then in subsequent mass migratory waves such as the 2015 crisis.

**Graph 1. Muslim Population Growth in Austria (1950-2021)**



As in much of the West, until the 9/11 terrorist attacks, for the most part, Islam and Muslims had not been associated with security concerns. However, Islamic radicalism and a greater influx of Muslim migrants changed that reality. That is the reason why the 2015 revision of Austria’s Islam Law (*Islamgesetz*) has been hailed as a necessary measure to address the unique challenges posed by the growing Muslim population in the country. This law introduced critical regulations to ensure that Islamic organisations adhere to Austrian cultural and legal norms. Key provisions include prohibiting foreign

funding for religious organisations and requiring mosque sermons to be delivered in German.

While aimed at integration, such measures have been criticised at both the political and academic levels as discriminatory and counterproductive, leading to further marginalisation –e.g., Sezgin, 2018.<sup>49</sup> However, they seem to be grounds for concern. Anti-Christian sentiments are on the rise, both from radical secularism and radical Islam. As the latest report of the Observatory on Intolerance and Discrimination against

Christians in Europe (OIDAC Europe) shows in 2023, there were 2,444 anti-Christian hate crimes across 35 European countries in 2023. These incidents include 232 personal attacks, such as harassment, threats, and physical violence.<sup>50</sup>

organisations reporting an increase of more than 400%.<sup>51</sup> As part of its implementation of 38 concrete measures against antisemitism recommended by the *2021 National Strategy to Combat Antisemitism*, the US government established an executive department in the Federal Chancellery on Austrian Jewish Cultural Heritage and announced the “Prevention of Antisemitism through Education” initiative.<sup>52</sup>

Similarly, the European Union Agency for Fundamental Rights (FRA) latest survey reveals a growing antisemitism. The survey pre-dates the Hamas attacks on 7 October 2023 and Israel’s military response in Gaza. But the report includes information about antisemitism collected from 12 Jewish community organisations more recently. Jewish people have experienced more antisemitic incidents since October 2023, with some

Since the outbreak of the global war on terror, but especially since the peak of the 2015 migrant crisis, the EU has experienced several Islamist-inspired terrorist attacks.

**Table 2. Islamist-inspired terrorist attacks in the EU (2015-2023)**

Date	Location	Casualties (Fatalities/Injuries)	Description
<b>2015</b>			
Jan 7-9	Paris, France	17 / 22	Charlie Hebdo shooting: Attackers targeted the offices of the satirical magazine Charlie Hebdo, a kosher supermarket, and police officers.
Nov 13	Paris, France	130 / 368	November 2015 Paris attacks: Coordinated shootings and bombings across multiple locations, including the Bataclan theatre.
<b>2016</b>			
Mar 22	Brussels, Belgium	32 / 340	Brussels bombings: Suicide bombings at Brussels Airport and Maalbeek metro station.
Jul 14	Nice, France	86 / 458	Nice truck attack: Attacker drove a truck into crowds celebrating Bastille Day.
<b>2017</b>			
May 22	Manchester, UK	22 / 139	Manchester Arena bombing: Suicide bombing during an Ariana Grande concert.
Aug 17	Barcelona, Spain	16 / 152	Barcelona attacks: Van ramming on La Rambla, followed by a related attack in Cambrils.
<b>2018</b>			
Dec 11	Strasbourg, France	5 / 11	Strasbourg attack: Shooting near the Christmas market by an individual on a terror watch list.
<b>2019</b>			
Nov 29	London, UK	2 / 3	London Bridge stabbing: Attacker, previously convicted of terrorism offenses, targeted pedestrians.
<b>2020</b>			
Oct 16	Conflans-Sainte-Honorine, France	1 / 0	Murder of Samuel Paty: Teacher beheaded after showing cartoons of Prophet Muhammad.
Nov 2	Vienna, Austria	4 / 23	Vienna attack: Gunman opened fire in the city centre near a synagogue.
<b>2021</b>			
Sep 25	Paris, France	0 / 6	Paris stabbing: Attack near the former Charlie Hebdo office; attacker motivated by cartoons of Prophet Muhammad.
<b>2022</b>			
Nov 10	Brussels, Belgium	1 / 1	Brussels stabbing: Police officer killed in a knife attack; perpetrator had been on a counterterrorism watch list.
<b>2023</b>			
Jan 25	Algeciras, Spain	1 / 4	Church stabbing: Machete attack at two Catholic churches, resulting in the death of a sacristan and injuries to several others
Oct 16	Brussels, Belgium	2 / 1	Brussels shooting: Gunman targeted Swedish nationals before a football match; attacker claimed allegiance to ISIS.

Source: Europol

48 Available at: <https://www.statistik.at/en/statistics/population-and-society/population/further-population-statistics/religious-denomination>

49 Sezgin, Z. (2018). ‘Islam and Muslim Minorities in Austria: Historical Context and Current Challenges of Integration.’ *International Migration & Integration*, 20, pp. 869–886.

50 OIDAC (2024). ‘Intolerance and Discrimination Against Christians in Europe Report 2024.’ Available at: <https://www.intoleranceagainstchristians.eu/publications/oidac-report-2024>

51 FRA (2024). ‘Jews in Europe still face high levels of antisemitism’, 11 July 2024. Available at: <https://fra.europa.eu/en/news/2024/jews-europe-still-face-high-levels-antisemitism>

52 US Department of State. 2022 Report on International Religious Freedom: Austria. Available at: <https://www.state.gov/reports/2022-report-on-international-religious-freedom/austria/>

Supporters of the 2015 revision of Austria's Islam Law argue that these measures are essential for promoting integration and preventing the radicalisation of Muslim communities. By mandating the use of German in religious settings, the Austrian government seeks to foster linguistic unity and ensure that religious teachings align with Austrian values. The prohibition of foreign funding, meanwhile, addresses concerns about external influence, particularly from countries such as Turkey and Saudi Arabia, which have been accused of exporting fundamentalist ideologies. This is the reason why, in 2021, the Office for Religious Affairs implemented an amendment to the Federal Act on the External Legal Relationships of Islamic Religious Societies, providing for stricter annual government monitoring of the finances of mosques and Muslim cultural associations, focusing on financial flows from foreign state institutions. The legislation also allows the Office for Religious Affairs

to request the names of legal representatives and religious functionaries of recognised Islamic religious societies that are public law corporations. It also provides for revocation of their legal status if they fail to maintain the applicable requirements, with the approval of the IGGO.

While critics, including Islamic organisations, have decried the law as discriminatory, proponents argue that it strikes a balance between religious freedom and societal security. After all, Austria's unique position as one of the first European countries to officially recognise Islam does not negate the necessity of adapting to modern challenges posed by migration and globalisation. The regulation of religious practices is framed as a pragmatic approach to ensuring that Islamic institutions contribute to, rather than disrupt, Austrian society<sup>53</sup>.

compatibility, and economic pressures. The perception of multiculturalism as being imposed without sufficient regard for its impacts has amplified scepticism toward EU citizenship as a unifying concept. Unless these challenges are effectively addressed, resistance to EU citizenship will likely grow, further undermining the broader European integration project.

This analysis brings us now to a forward-looking chapter, which explores strategies to reconcile these tensions. It focuses on the importance of developing inclusive policies that not only address citizens' concerns but also foster solidarity and cohesion, ensuring that EU citizenship evolves to meet the demands of contemporary Europeans.

#### 4.4. Migration-Fueled Sentiments and the Rise of Populism

Austria's restrictive stance on migration and integration reflects widespread public scepticism about the benefits of immigration. According to Eurobarometer (2021),<sup>54</sup> 56% of Austrians believe that immigration negatively impacts their country, significantly higher than the EU average of 45%. This sentiment has been fueled by migration's visible cultural and economic challenges, including unemployment, housing shortages, and increased social tensions.

Right-wing political movements, such as the Freedom Party of Austria (FPÖ), have capitalised<sup>55</sup> on these concerns, framing migration as a threat to Austrian values and security (Hafez & Heinisch, 2024). Policies such as the 2017 "burqa ban," which prohibits full-face coverings in public spaces, have been widely supported as measures to protect public order and uphold Austria's cultural identity. While critics label these policies as discriminatory, their popularity among voters suggests that they resonate with the broader public's desire to preserve traditional Austrian norms and national identity. The clearest example of this phenomenon has been the recent win in the September 2024 Parliamentary elections of FPÖ.

As we see, mass migration, in general, and Islam, in particular, have become a focal point for debates on integration and citizenship. Tausch (2016) highlights how Muslim immigration continues to polarise European societies, with

Austria often at the forefront of these debates<sup>56</sup>. The country's integration policies, including mandatory German language courses and civic education, aim to address these challenges by ensuring that migrants adopt Austrian cultural norms. However, public discourse remains dominated by fears that the growing Muslim population could erode Austria's cultural heritage in light of increasing anti-Christian and anti-Jewish sentiments. This has sparked scepticism toward Muslim immigration, reflecting broader European trends of divided public opinion and rising concerns about cultural integration and security.

This chapter has shown that the main challenges to EU citizenship can be understood as stemming from two fundamental issues. First, the resurgence of national identity and sovereignty has created significant friction within the European Union. Many citizens perceive EU frameworks as an imposition on their national heritage, leading to resistance against the idea of a supranational European identity that might dilute their traditional sense of belonging. The prioritisation of national sovereignty over collective European goals compounds this tension.

Second, mass migration and multiculturalism, particularly the influx of irregular migrants and the integration of Muslim populations, have added further strain. These dynamics have sparked debates about societal cohesion, cultural

<sup>53</sup> The 2021 Eurobarometer already showed a reduced proportion of Austrians who thought that the integration of immigrants in their country had been successful (5% lower than in the previous poll, down to 42%). See Eurobarometer. Integration of Immigrants in the European Union. Available at: <https://europa.eu/eurobarometer/surveys/detail/2276>

<sup>54</sup> Eurobarometer. Integration of Immigrants in the European Union. Available at: <https://europa.eu/eurobarometer/surveys/detail/2276>

<sup>55</sup> Hafez, F., Heinisch, R. & Miklin, E. (2019). 'The New Right: Austria's Freedom Party and changing perceptions of Islam,' *The Brookings Institution*. Available at: <https://www.brookings.edu/articles/the-new-right-austrias-freedom-party-and-changing-perceptions-of-islam/>

<sup>56</sup> Tausch, A. (2016). 'Muslim Immigration Continues to Divide Europe: A Quantitative Analysis of European Social Survey Data.' *Middle East Review of International Affairs*, 20 (2) (Summer 2016), pp. 37-50.

## POLICYMAKING TO PROMOTE EU CITIZENSHIP

EU citizenship represents a unique and ambitious attempt to create a shared identity and rights framework that transcends national borders. However, its implementation faces significant challenges, particularly in the context of migration and integration. Austria provides an insightful case study, illustrating both the benefits of prioritising national

identity within the EU citizenship framework and the potential pitfalls of restrictive and exclusionary policies. By examining Austria's approach alongside broader European trends, this chapter proposes a nuanced path forward that emphasises national sovereignty, bottom-up policymaking, and balanced integration strategies.

### 5.1. Austria's Approach: A Model and a Warning

Austria has long championed policies that prioritise national identity over supranational EU citizenship. This approach is exemplified by its Integration Act of 2017 and its strict naturalisation criteria, which emphasise language acquisition, cultural assimilation, and economic self-sufficiency. Austria's Islam Law, which mandates that mosque sermons be delivered in German and prohibits foreign funding for Islamic organisations, reflects its commitment to safeguarding national cohesion and aligning integration efforts with Austrian values.

Such policies resonate with public sentiment and highlight the importance of retaining national control over migration and integration. As Permoser and Rosenberger (2013) argue, Austria's emphasis on cultural assimilation and self-reliance counterbalances the liberal idealism often associated with EU citizenship<sup>57</sup>. By ensuring that migration does not destabilise its social systems or dilute its cultural heritage, Austria offers valuable lessons for other EU member states navigating similar challenges.

However, Austria's approach also underscores the risks of instrumentalising calls for national identity. As mentioned in the previous chapter, the rise of far-right parties, such as the Freedom Party of Austria (FPÖ), reveals how such policies can fuel divisive rhetoric and exacerbate societal tensions. The FPÖ has capitalised on public concerns about migration, framing Muslims as a cultural and security threat, a narrative which has contributed much to the party's electoral success, as evidenced by its strong performance in the 2024 parliamentary elections.

The FPÖ's rhetoric polarises public discourse and risks undermining Austria's efforts to promote inclusivity,

self-perpetuating a cycle that prevents national unity and integration. Scholars such as Hafez and Heinisch (2024) argue that the party's focus on cultural homogeneity and anti-Muslim sentiment reflects broader European trends of populism and nationalism<sup>58</sup>. These dynamics highlight the need for integration strategies that address public concerns without legitimising exclusionary narratives.

Austria's approach to integration offers valuable lessons for other EU member states navigating similar challenges. However, it also underscores the importance of balancing national identity with efforts to foster inclusivity and prevent social fragmentation. Comparative examples from other EU countries provide insights into achieving this balance.

Sweden, for instance, adopts a more inclusive model emphasising multiculturalism and robust welfare support. By providing targeted resources for migrants, including language training, housing, and healthcare, Sweden promotes social cohesion while addressing the practical challenges of integration. Similarly, Germany's dual focus on integration courses and labour market access highlights the importance of equipping migrants with the tools they need to succeed while fostering a sense of belonging.

These examples demonstrate the potential for EU member states to address integration challenges through policies that respect national sovereignty while aligning with broader EU principles. By fostering dialogue and collaboration, the EU can facilitate the exchange of best practices among member states, ensuring that integration policies are both effective and inclusive.

<sup>57</sup> Permoser, J.M. & Rosenberger, S. (2012). 'Integration Policy in Austria', in Friderese, J. & Biles, J. (eds.) *International Perspectives: Integration and Inclusion*. McGill-Queen's University Press, pp. 39-58.

<sup>58</sup> Hafez, F. & Heinisch, R. (2024). *Politicizing Islam in Austria: The Far-Right Impact in the Twenty-First Century*, Rutgers University Press.



## 5.2. EU Citizenship: National Frameworks Over Supranational Identity

As Maas (2014) notes, EU citizenship's exclusivity remains firmly tied to national frameworks. While this design ensures that EU citizenship complements rather than replaces national citizenship, it also highlights the limits of its transformative potential. The EU's inability to legislate directly on citizenship matters, leaving decisions to member states, reinforces the primacy of national sovereignty.

Austria's policies illustrate the value of maintaining this national sovereignty within the EU citizenship framework. By tailoring integration strategies to reflect their unique cultural and social contexts, member states can address public concerns more effectively than top-down EU mandates. This approach aligns with the vision of EU citizenship as a framework that facilitates cooperation among diverse nations rather than imposing uniformity.

## 5.3. Balancing Integration Responsibilities

A central element of promoting EU citizenship is addressing the challenges posed by migration and integration. Austria's policies highlight the importance of placing the burden of integration more on migrants than on host communities. Mandatory language and civic education programs, as well as requirements for economic self-sufficiency, ensure that migrants actively contribute to their host societies. These measures support social cohesion and alleviate public concerns about migration's impact on cultural and financial stability.

However, integration policies must avoid becoming overly punitive or exclusionary. Austria's restrictive naturalisation criteria and prohibition of dual citizenship, while effective in some respects, risk marginalising migrants and perpetuating social divides. A more balanced approach would combine strict integration requirements with targeted support programs, such as vocational training and mentorship initiatives, to facilitate migrants' participation in society.

## 5.4. Bottom-Up Policymaking: Lessons from Austria and Beyond

Austria's integration policies highlight the importance of bottom-up policymaking in fostering a meaningful and sustainable concept of EU citizenship. By allowing member states to tailor their own integration strategies, the European Union can ensure that policies align with local realities and priorities while maintaining the overarching framework of EU principles. This approach encourages innovation and strengthens public trust in EU institutions by respecting national sovereignty and cultural diversity.

Austria's policies illustrate the value of bottom-up approaches in navigating the complex interplay between national identity and supranational EU citizenship. As examined in the previous chapter, the Integration Act of 2017, for example, mandates language acquisition and civic education for migrants, reinforcing Austria's emphasis on cultural assimilation. The act also introduces the "Integration Agreement," which places clear responsibilities on migrants, ensuring they actively engage in Austrian society.

Another example that has been reviewed is Austria's Islam Law of 2015, which prohibits foreign funding of Islamic organisations and requires mosque sermons to be delivered in German. This law reflects Austria's focus on aligning integration efforts with its national values while mitigating external influences. Though controversial, it demonstrates how national frameworks can address specific concerns, such as the perceived risks of cultural fragmentation and radicalisation.

However, Austria's approach is not without its limitations. While these policies resonate with public sentiment, they can also exacerbate divisions and foster exclusionary attitudes. The rise of far-right parties, such as the Freedom Party of Austria (FPÖ), has capitalised on anti-migrant rhetoric, showing how a strong focus on national sovereignty can sometimes fuel societal polarization.

Austria's bottom-up approach is part of a broader trend across the European Union, where member states tailor integration policies to their unique historical, cultural, and political contexts. This diversity underscores the flexibility of the EU citizenship framework and offers valuable lessons for policymakers.

- **Germany:** Germany's integration policies combine strict requirements with substantial government support. The Integration Course Program, for instance, mandates language proficiency and civic education for migrants while providing resources to help them succeed. These courses ensure that migrants are equipped to participate fully in German society while affirming its cultural values. The program's success in promoting economic and social inclusion demonstrates how tailored policies can address public concerns while fostering integration.
- **France:** France's integration policies reflect its commitment to secularism or *laïcité*. Measures such as the 2004 ban on wearing conspicuous religious symbols

in public schools aim to preserve France's secular identity and promote social cohesion. While often contentious,<sup>59</sup> these policies illustrate how member states use their sovereign authority to balance individual rights with national values, even within the broader EU framework.

- **Sweden:** Unlike Austria and France, Sweden emphasises multiculturalism and comprehensive welfare support for migrants. Programs like the Establishment Plan for New Arrivals offer language training, housing assistance, and employment preparation. This

inclusive model demonstrates Sweden's commitment to diversity and equality, highlighting an alternative approach to integration that fosters social cohesion while respecting national sovereignty.

These examples demonstrate that member states, when given the flexibility to craft their own policies, can address migration and integration challenges in ways that align with their unique contexts. They also show that no single model is universally applicable, underscoring the importance of a bottom-up approach to policymaking.

## 5.5. Challenges of Fragmentation and EU Coordination

While national sovereignty allows for tailored approaches to integration, it can also lead to disparities across the EU. Divergent naturalisation policies, for example, create uneven pathways to citizenship and integration. Austria's strict criteria –requiring a minimum of ten years of residency, language proficiency, and economic self-sufficiency– contrast sharply with Sweden's more inclusive approach, which offers a five-year residency requirement and fewer economic barriers. These disparities can hinder the cohesion of EU citizenship by creating unequal outcomes for migrants.

Another challenge is reverse discrimination, where nationals of a member state may face stricter criteria for accessing benefits than EU citizens from other countries residing in that state. For instance, an Austrian citizen might encounter more stringent requirements for social assistance than an EU citizen living in Austria. This phenomenon reflects the inherent tensions between national and EU citizenship rights and underscores the limitations of the EU's supranational framework.

To reconcile the tensions between national sovereignty and EU-wide integration, the following five recommendations can enhance the effectiveness of bottom-up policymaking:

1. **Encourage the exchange of best practices:** The EU should facilitate platforms for member states to share successful integration models. Austria's emphasis on language acquisition and civic education, Germany's robust support for integration courses, and Sweden's comprehensive welfare programs offer valuable insights that other countries can adapt to their contexts.
2. **Support financial and technical resources:** The EU can allocate funding to assist member states in implementing effective integration programs. For example, countries like Italy and Greece, which face high migration flows, could benefit from additional resources to develop vocational training and housing initiatives for migrants.

3. **Foster regional cooperation:** Regional partnerships, such as the Visegrád Group or the Nordic Council, allow member states to collaborate on shared challenges. The EU can encourage these initiatives while ensuring they align with broader principles of equality and inclusivity.

4. **Promote transparency and public dialogue:** Integration policies should be transparent and involve participatory decision-making processes. Engaging diverse stakeholders, including migrant communities, can build trust and promote understanding. Austria's Islam Law, for instance, could be accompanied by initiatives to address concerns about stigmatisation and safeguard religious freedoms.

5. **Balance rights and responsibilities:** Integration policies must combine rigorous requirements with targeted support, ensuring that migrants have the resources to succeed while fulfilling their obligations. Programs like Austria's Integration Year Program offer a model for aligning integration efforts with labour market needs.

Austria's bottom-up approach to migration and integration highlights both the strengths and limitations of national sovereignty within the EU citizenship framework. By tailoring policies to reflect local realities, Austria has addressed public concerns while promoting cultural assimilation. However, its experience also underscores the risks of exclusionary practices and societal polarisation.

The diversity of approaches across EU member states illustrates the flexibility of bottom-up policymaking and its potential to foster innovation. By facilitating cooperation and encouraging the exchange of best practices, the EU can help member states develop integration strategies that respect national sovereignty while advancing collective European values. Doing so can ensure that EU citizenship remains a meaningful and cohesive concept in an increasingly diverse and fragmented Europe.

<sup>59</sup> Vaisse, J. (2004). 'Veiled Meaning: The French Law Banning Religious Symbols in Public Schools', *The Brookings Institution*. Available at: <https://www.brookings.edu/articles/veiled-meaning-the-french-law-banning-religious-symbols-in-public-schools/>

## Conclusion

# A COOPERATIVE MODEL FOR EU CITIZENSHIP

The concept of EU citizenship, introduced in the Maastricht Treaty of 1992, was envisioned as a unifying framework to integrate diverse nations under shared rights and values. However, three decades later, it remains primarily rooted in the national frameworks of member states, raising questions

about its transformative potential. This chapter proposes a cooperative model for EU citizenship that balances national sovereignty with the shared goals of the European project, offering a path forward to reconcile the challenges of migration, integration, and identity.

### 6.1. The Role of National Frameworks in Shaping EU Citizenship

EU citizenship is derivative by nature, as it is only accessible to those who hold the nationality of an EU member state. This dependency ensures that member states retain primary control over citizenship rights and integration policies, reflecting the subsidiarity principle underpinning the EU. While this design respects national sovereignty, it also exposes disparities in citizenship policies across the Union.

requires mosque sermons to be delivered in German and prohibits foreign funding of Islamic organisations, demonstrates a targeted approach to safeguarding national cohesion.

Austria exemplifies the importance of national sovereignty in addressing public concerns and preserving cultural identity within the EU framework. Its Integration Act of 2017 mandates language acquisition and civic education for migrants, ensuring alignment with Austrian values. Similarly, Austria's Islam Law of 2015, which

However, the Austrian case also reveals the challenges of excessive national emphasis. Its restrictive naturalisation policies, which require ten years of residency and economic self-sufficiency, create barriers for migrants seeking to integrate fully. Furthermore, the rise of far-right populist parties, such as the Freedom Party of Austria (FPÖ), highlights the potential for national sovereignty to exacerbate societal polarisation when integration policies are perceived as exclusionary or when they fall short in addressing evident social challenges.

### 6.2. The Need for a Cooperative Model

While respecting the diversity of national approaches, the EU must foster greater coordination and cooperation to address the disparities undermining the promise of EU citizenship. A cooperative model would ensure that member states retain

their cultural and political identities while advancing the shared values of the Union. This model is particularly critical in addressing the challenges posed by migration and integration, which require both national and supranational solutions.

### 6.3. Key Pillars of a Cooperative Model for EU Citizenship

There are at least six main areas which would configure a cooperative model for a better –more effective and less threatening to national identity– EU citizenship.

social welfare policies. The EU should provide a framework that ensures these national policies adhere to fundamental principles of equality, inclusivity, and non-discrimination.

- 1. Balancing national sovereignty and EU principles:** A cooperative model recognises that member states are best positioned to address their unique social and cultural contexts. Austria's emphasis on cultural assimilation reflects its historical and demographic realities, while Sweden's multicultural approach aligns with its broader

For instance, Austria's Integration Act could serve as a best-practice model for requiring language acquisition and civic education. At the same time, Sweden's Establishment Plan for New Arrivals highlights the importance of providing robust support systems for migrants. The EU should facilitate the

exchange of such best practices among member states, fostering mutual learning and innovation.

#### 2. Addressing disparities in citizenship policies:

Disparities in naturalisation requirements, such as residency duration and language proficiency, create unequal opportunities for migrants across the EU. For example, Austria's ten-year residency requirement contrasts sharply with Sweden's five-year requirement, reflecting divergent philosophies of integration. The EU can address these disparities by setting minimum standards for naturalisation policies, ensuring a baseline of fairness while allowing member states to tailor additional criteria.

Furthermore, the EU must tackle the issue of reverse discrimination, where nationals of a member state face less favourable treatment than EU citizens residing in that state. Resolving this tension requires a more precise delineation of the rights associated with national and EU citizenship.

#### 3. Promoting inclusive integration policies:

Integration is a shared responsibility between migrants and host communities. Austria's policies emphasise the active participation of migrants through language and civic education programs. However, these requirements should be complemented by support systems that address structural barriers, such as discrimination in employment and housing. For example, Germany's Integration Course Program, which combines mandatory requirements with government-funded support, offers a balanced approach that can inform EU-wide standards.

A cooperative model must also prioritise the integration of TCNs, who are excluded from EU citizenship despite living, working, and contributing to member states. The Long-Term Residents Directive (2003/109/EC) provides a framework for granting TCNs rights comparable to EU citizens, but its uneven implementation underscores the need for greater coordination.

#### 4. Enhancing public trust through transparency and dialogue:

Public confidence in EU institutions is crucial for the success of a cooperative model. Integration policies must be transparent and participatory, involving diverse stakeholders, including migrant communities. Austria's Islam Law, while effective in some respects, has faced criticism for stigmatising Muslims. Addressing such concerns requires open dialogue and safeguards to ensure that integration measures promote inclusivity rather than marginalisation.

Public education campaigns can also play a role in countering xenophobic narratives and highlighting the contributions of migrants to European societies. For instance, Sweden's emphasis on community engagement demonstrates the potential for fostering social cohesion through inclusive narratives.

#### 5. Strengthening regional and EU-wide cooperation:

Regional partnerships, such as the Visegrad Group or the Nordic Council, provide platforms for member states to collaborate on shared challenges. The EU should support these initiatives while ensuring alignment with broader principles of equality and inclusivity. Additionally, the EU can allocate financial and technical resources to assist member states in implementing effective integration programs, particularly those facing high migration flows.

#### 6. Emphasising the economic dimensions of integration:

Integration policies must align with labour market needs, ensuring that migrants can contribute to and benefit from economic opportunities. Austria's Integration Year Program, which provides language training and vocational education, offers a model for addressing both integration and labour market demands. Expanding such programs across the EU can enhance migrants' economic contributions while addressing skill shortages in key sectors.

## 6.4. Conclusion: A Path Forward for EU Citizenship

A cooperative model for EU citizenship offers a path to reconcile the tensions between national sovereignty and supranational aspirations. By fostering dialogue, sharing best practices, and addressing disparities, the EU can create a citizenship framework that respects diversity while promoting unity.

Austria's tailored approach demonstrates the potential of national sovereignty to address integration challenges, but it also underscores the risks of exclusionary policies. A cooperative model must balance preserving national identity with advancing shared European values, ensuring that EU citizenship remains a meaningful and inclusive concept.

In an era of increasing diversity and complexity, EU citizenship must evolve to meet the demands of its citizens. The EU must be of its citizens and, therefore, it must also attend their claim to preserve national identity, language, love for homeland, traditions, etc. By embracing a cooperative approach, the EU can reaffirm its commitment to unity in diversity, building a future where citizenship is available to all those who embrace the identity traits of an EU member state, which include or is embedded in an overall EU set of principles and sentiments. In other words, when it comes to citizenship, diversity must refer to not just an overall diversity leading into nothingness, but a plurality of national identities. By doing so, the EU pathway to citizenship will bring about a future where citizens, as such, can participate fully in the European project.

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