Comparative Analysis of Germany and France Migration Policy

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Abstract: This article compares the migration policies of Germany and France. The specific migration history, political views and social integration approaches of these countries are examined. By studying the management policies of Germany and France in determining their migration routes and the immigration measures based on labor demand, common approaches to migration issues in the European Union are identified.

Keywords: Germany, France, migration policy, comparative analysis, European Union, integration, immigration.

INTRODUCTION

In recent years, the influx of migrants to Europe has created new social, economic and political problems for Germany and France. These countries are the largest migration destinations in the region, and their experiences are important for the study of migration policy. This article analyzes the similarities and differences between the migration policies of Germany and France. In Germany, migration policy has been shaped by the need for labor force, while in France, migration has historically served the demographic growth of the population. The main aspects of the migration policies of the two countries and their importance in the context of the European Union are covered in the article.

THE MAIN PART

When it comes to the flow of migration to Europe, Germany and France are the countries that have received the most migrants in the region and are important in shaping the politics of the region. A comparative analysis of the migration policy of these countries allows us to understand the general policy of the region in many ways, and helps us to understand the current problems and achievements in the field of migration, as well as current issues. Moreover, the experience of these countries is attractive for research in this direction with its importance and essence. Therefore, we will use the method of comparative analysis to study the migration policies of France and Germany, and at first we will give brief information about this method.

When doing a comparative analysis of the migration policies of Germany and France, it is necessary to reveal the characteristics, similarities and differences of the work being done on migration, the causes of migration.

Researchers Münz and Ulrich describe six main stages of immigration to Germany after World War II:[Münz, R] 1) The first stage, the postwar period (1945-1949), was characterized by the immigration of expelled ethnic Germans, World War II refugees, and concentration camp survivors. In addition, the government encouraged the immigration of foreign labor, especially from Mediterranean countries, for economic reasons. 2) After the partition of Germany by the Allies, migration between East and West Germany began a second phase, and then bilateral labor contracts were concluded between Italy, Spain, Greece, Turkey, Morocco, Portugal, Tunisia and Yugoslavia for West Germany's needs. During this period, the number of foreigners in the country increased by 4 times. 3) The third stage for 1961-1973 is characterized by the recruitment of foreign workers. This period was the main factor in the rapid growth of the foreign population in West Germany, with the number of foreign workers reaching three million (in 1950, there were only 72,000 foreign workers). According to Münz and Ulrich: "The purpose of West German labor policy was not to support organized immigration, but to counteract the cyclical and demographic obstacles in the West German labor market" [Münz, R]. This is because work and residence permits were only valid for one year. 4) Although the oil price shock and the country's recession forced the government to freeze recruitment altogether, the influx of foreigners continued through family reunification. The government's decision to stop hiring foreign workers backfired. Because foreign workers did not leave Germany for fear of not being able to return, the foreign population increased in the country. 5) Immigration increased again after the fall of the Iron Curtain and the reunification of Germany, and because of the war in Yugoslavia, which caused many refugees. By 1994, the number of foreigners in Germany reached seven million. 6) New restrictions on the immigration of ethnic

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Germans and asylum seekers introduced since 1992 represent the sixth stage. Although Münz and Ulrich mention only six stages, the creation of a common EU asylum and immigration system and the abolition of internal borders certainly led to a new stage. In addition, it is no exaggeration to say that the seventh stage took place when most of the thousands of refugees (mostly Syrians) who were born as a result of the "Arab Spring" in the Middle East, which started in 2011, settled in Germany .

Unlike Germany, France has a long tradition of immigration. From the Napoleonic Wars until the 1950s, the population of France was in constant decline. In the twentieth century, various French governments, under pressure from pro-natalist groups and fighting the Malthusian illusion, turned to immigration as a way to increase population. Thus, unlike Germany, France, after 1945, the reason for hiring immigrant workers was not only to provide additional labor for the recovery and expansion of the economy, but also to ensure the necessary demographic growth of the population[Hollifield, J. F, 1986].

Also, France has a long history as a powerful country with great cultural, economic and political influence in the world, it colonized several lands in the world in its time and today it is one of the developed and rich countries with a large economy. became an attractive country for the residents of the old colonial countries. After World War II, France began hiring foreign workers and encouraging immigration in response to declining population trends. Foreign workers worked in low-paid and low-skilled jobs. Workers first came from Portugal and Spain, and later the old colonial lands received a new influx of immigrants from North Africa, which led to the loss of control over immigration schemes in the 60s and 70s [Belmonte, C, 2008].

Long before the oil crisis of 1973 and the economic crisis that followed, the governments of France and Germany were aware of the political and social consequences of large-scale immigration. Therefore, to prevent the rise of xenophobia in society, governments should (1) regain control over the migration process, that is, the recruitment, placement, and integration of foreigners, and (2) resettle, train, and care for the population. tried to create a better social infrastructure to do so. To achieve the first goal, in November 1972, in Germany and later in France,

the possibility of employers to hire foreign workers privately was abolished, forcing them to use official recruitment commissions. To achieve the second goal, both countries required employers to provide adequate housing for new foreign workers. Thus, employers were obliged to contribute to the development of the social infrastructure necessary to support a large foreign workforce. In France, these measures faced objections from trade unions and employers' associations, which forced the government to make concessions and liberalize the procedure for hiring foreigners[Hollifield, J. F, 1986].

At this point, it should be mentioned that among the labor force immigration to Germany and France, the specific aspects are where these immigrants come from. Researchers Wido Geis, Silke Uebelmesser, Martin Werding, who studied this from the point of view of geographical and cultural proximity factor, compare four countries: Germany, France, Great Britain and the USA. Focusing on foreign-born immigrants, the researchers found that about 49% of all immigrants to the United States were from Canada, Central and Caribbean America, 32% from Mexico; 79% of immigrants to Germany (for whom country of birth information is available) came from Europe, including Russia and Turkey; More than 74% of immigrants to France come from Europe and North Africa. In the UK, however, the picture is quite different. Only 27% of immigrants come from European countries[Geis, W . et al., 2008].

There are other factors that have a greater or lesser effect on geographic distance. For example, 33 percent of French immigrants came from the Maghreb, that is, not only from the lands close to France, but also from former colonial countries. This factor is also important for immigration to the UK, with 60% of immigrants coming from former colonies; but there, it is not a matter of geographical distance, but a cultural factor. In Germany, 76 percent of immigrants (spät-)aussiedler (immigrants of German origin) or guest workers (actively recruited between the 1950s and early 1970s) came from Eastern Europe, primarily from Southern European countries and Turkey. For immigrants to the US, such additional ties do not seem to be very important, but at least the large number of immigrants from the Philippines is certainly related to the fact that the Philippines is a former colony[6: 8].

Table 3.2.1: Immigrants by various definitions (18-65 years)

	(i) Nationality	(ii) Country of birth	(iii) As in (ii), for children of natives	(iv) As in (iii), for persons over 15 years of age at the time of migration
France:				
Immigrants	2,235,731	4,550,229	3,426,268	2,430,072
Level of participation	64.77%	67.39%	66.81%	64.26%
Unemployment rate	19.46%	16.00%	18.36%	19.71%
Payroll in USD (PPP)	$13.98	$16.03	$14.61	$14.41
Main source countries:	316,323	640,116	480,799	347,833
1. Morocco	308,766	921,284	469,593	317,070
2. Algeria	381,540	485,281	474,598	283,625
3. Portugal	143,892	183,472	181,705	134,514
4. Turkey	108,278	267,470	173,978	138,207
5. Tunisia				
Germany:				
Immigrants	5,533,608	9,200,879		5,648,068
Level of participation	68.40%	68.85%		70.75%
Unemployment rate	20.39%	18.05%		19.62%
Payroll in USD (PPP)	$15.57	$15.72		$16.00
Main source countries:	1,333,512	1,339,737		755,108
1. Turkey	258,114	829,751		631,454
2. Russia	239,271	682,191		463,433
3. Poland	500,315	389,075		239,800
4. Italy	254,335	252,812		171,040
5. Serbia and Montenegro				

Source: Geis W., Uebelmesser S., Werding M., ibid., p. 5.

According to researcher Hollifield, Germany has been more successful than France in managing migration policy. He writes that we can expect the French state to have an advantage in policy development and implementation due to the centralized nature of public administration and the relative autonomy of the bureaucracy vis-à-vis pressure groups. However, in reality, the country with significant structural advantages in the implementation of the policy is Germany. Interest groups in Germany are closely tied to the state and are more likely to support policy changes. This is especially important when it comes to immigration policy, since it is difficult to implement immigration bans without the consent of major economic groups. The neo-corporatist nature of politics in Germany makes it easier for the state to gain support from employers in implementing a ban on new foreign workers. These differences in state-society relations between France and Germany are a reflection of the differences between the two economies. While production in France has traditionally been decentralized in smaller firms, production in Germany has been concentrated in much larger firms. It is easier to control the use of foreign labor in large production industries than in small factories[Hollifield, J. F, 1986].

Also, in Germany, the stoppage of immigration was sharper and more severe than in France. The German government has clear distinctions between a work visa and a residence visa. Consequently, they saw no inconsistency in unilaterally ending immigration and deporting unemployed foreign workers. In addition, German policy tried to prevent the spouses and children of foreign workers who received residence permits from entering the labor market by issuing only temporary residence permits[Hollifield, J. F, 1986].

In France, efforts have also been made to prevent new immigrants, especially family members, from entering the labor market. Nevertheless, the Ministry of Labor allowed many new immigrants, including family members, to enter the labor

market after 1974 . Thus, France's ban on new immigration was less severe than Germany's. The French government was willing to make an exception to the new rules, recognizing immigrant families as part of the labor supply[Hollifield, J. F, 1986].

Some researchers explain this by the difference between the concepts of citizenship and nation in France and Germany. For example, Rogers Brubaker argues that the postwar immigration and integration practices of these two countries have deep roots in contrasting paths of nation-state formation, with the French using ius soli (granted by territory or place of birth) as the principles of citizenship acquisition and the Germans jus. is carried out on the basis of sanguinis (belonging to the children of citizens). The two different state-building processes were reflected in more universal and assimilative approaches to migrant integration in France, while in Germany they were reflected in more specific and exclusive approaches [Scholten, P. et al., 2016].

Unlike France, until 2000 German citizenship was based on jus sanguinis, meaning that one could only acquire German citizenship if one had German parents. However, since 2000, "Children born in Germany to foreign parents, if one of the parents has been a permanent and legal resident of Germany for at least eight years at the time of birth and has a right of residence, or If you have an indefinite residence permit for at least three years, you automatically become German. After birth, these children become German citizens, assuming all rights and obligations" [Inter Nationes, 1999]. They also have to choose which citizenship they want to retain until they turn 23. Although jus sanguinis remains the main principle of citizenship, in practice this means that Germany, like most European countries, can now acquire citizenship by place of birth. In general, this change is believed to make integration and assimilation easier and faster. Also, with this new piece of legislation, the Citizenship Act, aliens of legal age can acquire citizenship through certain requirements. To do this, as in France, certain requirements must be met, such as: knowledge of the German language and history (600 hours of German language and 60 hours of history lessons), respect for values and laws, democracy and Germany, as well as in Germany at least Must live for 8 years (previously 15 years). The complexity of German administrative practice and regulation stems from the fact that different German federal states (Länder) apply different criteria. For example, Bavaria requires applicants for citizenship not only to speak, but also to read and write fluently in German [Hofhansel, C, 2008]. In addition, since 2008, immigrants must know important elements of German culture and even the Constitution in addition to the German language. All these amendments to the German Citizenship Law may seem at first glance to create more favorable conditions for those who wish to obtain German citizenship, but in fact they are still very limited[Ratzmann, N. et al., 2020].

Unlike Germany, France has a long history, tracing its origins back to the Gauls who appeared in the first millennium BC. Later, the long rule of the Roman Empire and the Carolingian Empire made its population a mixture of Celtic Gauls, Latins and Franks. From about the eighteenth century onwards, Safran notes, "the majority of French citizens became calmly assured of their Frenchness. They had many common historical memories" [Safran, W, 1991]. France and its people have experienced wars for hundreds of years and in turn "...benefited from a long history of political integration and the existence of strong national borders"[Safran, W, 1991]. Traditionally, the French expected foreigners to be assimilated, and in a sense, it was a melting pot that turned Italian, German, Polish, and Jewish immigrants into French in one generation. President Mitterrand, President of France from 1981 to 1995, sums it up: "We are French [and] our ancestors were Gauls [and] Romans and a little German, a little Jewish, a little Italian, a little Spanish, went sari portuguese... and are we a bit arab too? I ask myself" [Safran, W, 1991].

Many policies, such as the concept of assimilation, tried to "melt" foreigners into the French cauldron and escape the multicultural society and become French, but this process turned out to be difficult, because many foreigners rejected their different cultures or they did not want to forget their values. According to Martin, the "republican model" believed that immigrants should act French in public and limit the celebration of ethnic differences to their private lives"[Martin, P. L, 1995]. However, some immigrants do not want to assimilate, which disrupts the system. As Balz and Haddad rightly point out, "Although the civilizing mission is no longer clearly visible in French political discourse, the idea that French culture is superior to immigrant culture remains a key element of French politics" [Balz, M. J, 2012] .

Due to the 1992 Maastricht Treaty on the European Union and the 1995 Schengen Agreement, the movement of migration in the EU became more liberal and the number of immigrants increased. This has led to some changes in migration policy in Germany and France. In particular, in 2000, after admitting that Germany is actually a country of immigration, a new law was passed that allows non-European citizens (citizens of third countries) to participate in the German labor market - "Green Card". It was aimed at highly qualified professionals to fill the gaps needed in certain sectors of German industry and the economy as a whole . Green card holders were entitled to a residence permit for up to 5 years in parallel with a work permit. In addition, it "provided a work permit for spouses after a one-year stay, which was also available to foreign students in relevant academic disciplines, making it easier for them to stay in Germany immediately after graduation." [Von Stritzky, J, 2009]. The decision sparked a debate that led to the passage of a new Immigration Act that simplified existing immigration rules. For example, before the adoption of the law, there were five types of residence permits, but now there are only two of them: permanent and temporary. However, after being in Germany for a certain period of time and having received a temporary residence permit after meeting the relevant criteria, citizens can apply for a permanent residence permit. But more importantly, from both a legal and a social point of view, this law introduced integration and assimilation provisions for the first time in the history of German immigration. The most serious criticism of the law was the lack of effective channels for entering the German labor market[Georgiev, N, 2011].

Also, until 2005, Germany did not keep statistics on citizens of immigrant origin, as ethnic Germans and naturalized Germans were simply referred to as Germans. Since 2005, new rules have been introduced. According to it, a micro-registration is conducted to identify citizens of immigrant origin. Its first type includes two categories:

1. First, second and third generation foreign citizens;
2. German citizens abroad.

This is certainly a step forward compared to the German government in the context of immigration management, as it facilitates regulation of integration and knowing the number and type of immigrants helps the authorities in the process of creating integration programs. They can also rely on the Central Register of Foreigners, which provides information on German citizens abroad[Georgiev, N, 2011].

Since 2004, the French population census has been conducted annually by the National Institute of Statistics and Economic Research. According to the Census, "Populations may be classified by nationality, country of birth, or a combination of these to identify 'immigrants'." The definition is as follows: an immigrant is a person who was born abroad as a foreigner and resides in the country. This means that a person who acquires French citizenship after arriving in France is still an immigrant. On the contrary, a person born abroad as a French citizen is not an immigrant" [Fassmann, H. et al., 2009].

As of 2004, approximately 60% of French nationals were from Africa, particularly the Maghreb. According to French law, if married to a French citizen, French citizenship is granted after two years of marriage. French citizenship can also be obtained by naturalization. If he has lived in France for at least 5 years and shows that he has enough income to support himself and his family, he can apply for citizenship[Georgiev, N, 2011].

In 2006, Nicolas Sarkozy sought to "match immigration better with France's capacity to absorb migrants and its economic needs" by changing migration from family to work.[Marthaler, S, 2008] With this new policy, it created "selective immigration" and a "skilled and talented permit" system for highly skilled non-EU professionals to help France's economic development and keep France open to the global labor market. In a sense, Sarkozy tried to replace the old system, which relied on state welfare and family reunification and asylum seekers to fill low-skilled jobs in key sectors of the economy, with more desirable and skilled workers. These specially selected highly skilled workers could contribute and stimulate more to the French state and the country's economy [Belmonte, C. et al., 2012].

In addition, in 2009, under the leadership of Yazid Sabeg, Sarkozy's adviser on discrimination, France established a commission to assess the ethnic composition of France for the first time in its history. This idea was strongly opposed by many, including the French population, who argued that it was unacceptable to classify people by race or ethnicity as discriminatory[Georgiev, N, 2011].

It should also be noted that third-country nationals must obtain a long-term visa to be eligible for a residence permit in France. In addition, since 2006, those wishing to obtain a residence permit must sign a contrat d'accueil et l'integration, in other words, a type of contract between the resident seeker and the French Republic. This agreement provides free language and civics lessons, but also imposes certain obligations, such as respect for social norms and values. Also, in 2008, under the French presidency, the European Pact on Immigration and Asylum was adopted, which led to the establishment of three common factors of integration in Europe:[Georgiev, N, 2011]

1. Knowing the language of the host country;
2. To be able to get a job and;
3. Respect and accept the values of the host country.

Germany initially opposes some points of the draft European Pact on Immigration and Asylum. In particular, he demanded to exclude from the draft article on the establishment of the Asylum Agency, which has the authority to make decisions on obtaining refugee status[Bennhold, K. et al., 2008]. However, later the parties reached a mutual compromise. In general, there were other disagreements between N. Sarkozy and A. Merkel on the issue of immigration. One of them was related to the attitude of the French government in 2010 towards the policy of the Gypsies living in the country (that is, their expulsion from France)[Градусова, П.Б . et al., 2016]. The European Commission stated that this situation is ethnic discrimination. Also in 2011, Sarkozy threatened to unilaterally renegotiate the Schengen agreement in response to the soft position of Berlin and Brussels on Tunisian refugees[Allen, P. et al., 2006].

In the 2012 elections, the leader of the Socialist Party (PS) Francois Hollande, when he was elected president, tried to soften the immigration policy and tried to make the granting of citizenship easier. Moreover, the basis of Hollande's policy was to solve economic problems, not immigration, like Sarkozy's. That is, for Hollande, the issue of immigration was a secondary issue. This is probably why, during Hollande's time, there was almost no confrontation with Merkel's government in Germany on the issue of immigration. Conversely, as thousands of migrants flocked to the EU since 2013, when the migration crisis worsened due to the crisis of the political system in

Libya and the ongoing conflict in Syria and Iraq, while European leaders have taken different positions on this challenge, the positions of Germany and France have appeared to be largely similar. [Gradusova, P. et al., 2018].

Merkel decided to make a statement about the open borders of Germany for immigrants. France, which did not want to be left out of major foreign policy projects, took a similar position. However, the ruling circles of both countries soon realized that the possibilities of accepting foreigners were limited and began to call for the distribution of refugees throughout Europe. For example, Hollande agreed to receive more than 20 thousand people, as well as to establish a transit point in France for those going to Germany[Градусова, П.Б. et al., 2016].

2016 brought a new tone to the policy of the German-French tandem in the field of immigration. One of the news was the decision within the European Union to allocate funds to Turkey and five African countries to solve migration issues (in fact, it was aimed to limit the arrival of migrants to the EU through the territory of these countries). EU leaders preferred to leave the issue outside the Union. At the same time, Germany and France openly demonstrated their unanimity, they issued joint statements and held meetings aimed at a preliminary agreement [Градусова, П.Б. et al., 2016].

In the following periods, governments changed in both countries, while in 2020, the world began with the pandemic of COVID-19. This pandemic has itself affected immigration policy. Border closures were first introduced in 1992 after the Maastricht Treaty as quarantine zones at nation-state borders. Internal and external immigration has been suspended for nearly two years. However, the rich and developed countries of Europe, which could not meet their needs for permanent labor force, have increased their labor force requirements. According to the German Institute of Economics (IW), in 2022, more than 630,000 jobs will remain vacant in Germany due to the lack of suitable candidates among the unemployed[eadaily.com].

In general, when we do a comparative analysis of the immigration policy of Germany and France, we can observe enough similarities and differences. In general, or compared to other immigration countries such as the Anglo-Saxon countries, France and Germany have very

restrictive immigration policies, which in practice allow immigration almost exclusively for humanitarian reasons, including family reunification, asylum seekers. For example, although Germany has a high demand for skilled labor and, like the US, has developed its own Green Card, it is very difficult to obtain a work visa.

In addition, France and Germany are characterized by lower wages, high unemployment and generous welfare states. Taking these aspects into account, Anglo-Saxon countries attract highly skilled immigrants with strong economic potential, while France and Germany are preferred destinations for immigrants with lower qualifications and weaker economic potential. In other words, Anglo-Saxon countries can be recipients of brain drain (utechki mozgov), while France and Germany can be characterized as welfare magnets (magnity blagosostoyania)[Geis, W . et al., 2008]. This, in turn, affects the formation of national and regional immigration policies within the EU.

SUMMARY

The immigration policies of Germany and France differ in several aspects: 1) according to the composition of immigrants, i.e., while France mainly consists of immigrants from colonial countries, Germany initially consists of immigrants from southern European countries and Turkey, and later from Eastern Europe and Russia. 2) according to the classification of work, i.e., in France, immigrants work mainly in the private sector and in seasonal jobs, immigration has a decentralized form, while in Germany, immigrants work in large companies, it has a centralized system. 3) on the issue of citizenship (naturalization), Germany still had a blood-related (ie, one of the parents must be German or a German citizen) citizenship procedure until 2000, while France had its own provides citizenship based on birth in the territory. At the same time, there are several similarities in the immigration policies of Germany and France: 1) both countries, being considered welfare states, have a standardized wage distribution that favors more people in need of social protection, rather than highly skilled professionals; attracts asylum seekers and refugees. 2) both countries participate in the active immigration policy within the EU with their potential and play a major role in its formation and implementation. 3) both countries still have very restrictive immigration policies and procedures, in other words, obtaining residence and work visas is very complicated in these two countries. 4) both countries carry out the policy of assimilation and integration of immigrants on a large scale.

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