

RECONFIGURING CITIZENSHIP IN EUROPE

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Abstract:

The proliferation of membership reforms, changing incorporation policies, European Union citizenship are some of the indicators which point to substantive transformations in citizenship in Europe. I argue in the paper that national citizenship is, in fact, being reconfigured, in two distinct directions: the first in what has been called "*postnational*" membership; and, the second in what is called here *neonational* membership. I suggest that postnational and neonational trends have given rise to outcomes that appear convergent but in actuality feature divergent processes and contradictory elements. One of the ways to understand the convergence is to identify the different strategies which have contributed to its emergence. In the contemporary developments a wide array of "actors", including national governments, political parties, immigrant associations, transnational movements, and European Union entities, have pursued different actions and ways of ordering and organizing membership. These ways and actions are called here citizenship strategies. Three instances of apparent convergent outcomes are examined: nationality reform and incorporation policy, with a focus on the French and German cases, and the establishment and ongoing revision of EU citizenship.

In contemporary Europe, citizenship policies and practices have undergone dramatic changes.¹ Europe has witnessed a proliferation of citizenship and nationality reforms. Numerous Western European states, including Great Britain, Belgium, the Netherlands, Spain, Switzerland, Germany, and France, have revised or attempted to revise their citizenship, naturalization, or nationality provisions and criteria.² Some state revisions have appeared restrictive, including tightening nationality acquisition and redefining citizenship categories; others have been expansive, including facilitating the naturalization process, enabling dual nationality, and enlarging the eligibility criteria for citizenship. In the past decades, European polities have extended many rights previously associated with formal state citizenship, such as rights to access the social service system, the market place, and rights to residency. New policies to incorporate immigrants have included variations of multicultural policies and legislation extending the right to vote, at least on the local levels, to non-citizens.

At the same time, the continuing process of European integration and the provisions of the Maastricht Treaty have produced new categories of European citizenship and its associated rights

for the nationals of European Union member states. With all these changes, conflict over the practice and understandings of national membership has intensified. Beyond disputes over formal policies, various debates continue to arise over the meaning of national identity and community, the integration of immigrants- who may or may not be foreigners - and minority groups, and the definition of the nation. At various times in recent history, Western European states have proposed, and often passed, policies to restrict the access and incorporation of foreigners.³ In the broader conflicts over immigration and immigrants, the defense of national and restrictive models of membership are often contrasted with calls for immigrant rights and other forms of membership.

The character, consequence, and direction of these citizenship changes are greatly contested.⁴ Some studies advance the view that recent developments indicate that traditional understandings and operation of citizenship have become displaced, as different kinds of “postnational” trends in citizenship and society increase.⁵ Others, to the contrary, focus on how current trends demonstrate the adaptability of existing citizenship schema and the persistence of “national models” of state citizenship.⁶ Finally, others still point out that what is significant today are patterns of convergence across Western European politics.⁷

This paper seeks to address two questions about the changes in citizenship in Europe: Do trends in domestic and international policy making, public discourse, and political practices signal important transformations in citizenship development in Western Europe? And, to what extent has a convergence emerged across these European countries? I argue here that national citizenship is being reconfigured in two distinct directions. The first is in the direction of what has been called “*postnational*” membership (Soysal, 1994). By postnational, I mean to refer to developments that move beyond the formal state, or where the state is no longer the sole site for citizenship. However, transformations in citizenship are not simply moving from old national forms of membership to new, emergent postnational forms of membership. Instead of a dichotomy between existing national and postnational citizenship, there is a another set of citizenship outcomes in the direction of what I call *neonational* membership.⁸ By neonational, I mean to refer to developments whose effects are to reconfigure cultural, national, and transnational boundaries to ensure closure.

In this paper, I argue that the two developments - postnational and neonational membership - constitute limited or glancing kinds of convergence among European states. On the one hand, across Western Europe, seemingly convergent or common outcomes in nationality reforms, incorporation policies, and European citizenship, are apparent. But, the substance of these developments reveal very different angles and directions. One of the ways to understand such convergence is to identify the dominant strategies which have contributed to its emergence. In the contemporary developments a wide array of “actors” ranging from subnational, national, transnational to international levels have pursued actions and ways of ordering and organizing membership. I call these actions and ways citizenship strategies.⁹ The actors include national governments, political parties, immigrant associations, transnational movements, and EU institutions. Actor-centered strategies imply a narrow sense of agency, choice, and power relations: Whose strategies? To what end or for what purpose?¹⁰ Taken together, however, dominant sets of strategies are neither confined nor reducible to individual political actors or deliberative actions (Crow, 1989). For the purposes of this analysis, I am interested in identifying the changing

strategies, which are evident in policies, public discourse, collective action, and other political and institutional outcomes.

Citizenship development: postnational and neonational trends

Traditional citizenship has meant full membership in a polity. In the modern world, the polity has been understood to be a nation-state, that is citizenship is integrally linked to a territorial state and to the people (or nation) belonging to that state. In other words, citizenship has been regulated by states to specify a single and singular membership. Membership has been institutionalized by rights, benefits and obligations which distinguish members from non-members. It has been identified by substantive understandings of membership and community, and located in an authoritative nation-state. How different is this initial capsulation of state citizenship from current developments? Well, there is no doubt that citizenship matters have become more complex. A brief review of citizenship regulations, institutionalization, ideologies, and locus can underscore the changes.

Citizenship regulations cover the formal state membership policies, which set the legal procedures and parameters of state membership. In an administrative, legal sense these rules tell us who is a citizen and who is not. Variation in these rules among the European states have certainly existed, and continue to persist. Despite variations, European states generally have relied on the presumption that the regulation of modern citizenship has meant the regulation of a single citizenship, and the coincidence of bounded citizenries with territorial nation-states. The institutionalization of citizenship is another central dimension in state citizenship. This is defined in terms of incorporation, rights, benefits, and obligations. Such elements enforced the consequentialness of membership status. It delineated distinctions between nationals and non-nationals. It also underscored distinctions between effective, full citizens and those without full membership citizenship. T.H. Marshall defined modern citizenship as a status denoting full membership in a community to which are attached rights and duties. He outlined three elements of citizenship development: civil, political, and social rights.¹¹ Like citizenship regulations, citizenship institutionalization has evolved historically and varied cross-nationally.¹² Despite the dissimilarities, institutionalization in modern Europe was mainly about incorporation of bounded citizenries into national citizenship, which took place within the national parameters of a territorial nation or single state.¹³ It featured national referents, including the single state, shared nation-hood, and bounded rights. Developments often were seen as driven by national agents, including political elites and economic groups.

The ideology of a national citizenship is another dimension of state citizenship. These ideologies have presumed that membership is situated in the nation-state and that citizenries are defined by these national boundaries and identities. While noting the analytical difficulty of defining homogenous and specifically distinctive national sentiments, Max Weber underscored that "one can only do so by referring to a tendency toward an autonomous state" and that "sentiments of solidarity, very heterogenous in both their nature and origin, are comprised within national sentiments" (1946:179). Finally, the authority over citizenship and the capacity to regulate it has been traditionally located in a sovereign, autonomous nation-state. In all of the dimensions of citizenship outlined above, the role of the state has been integral. The nation-state set the boundaries for

citizenship, ensured the bounded citizenry, organized membership incorporation, and perpetuated the distinctions between nationals and non-nationals. The historical basis for this “model” or characterization of citizenship has been in fact the West European experience.

Yet, the recent developments to which I referred speak of very different citizenship matters. What led from the coincidence of citizenship and the nation-state to contemporary trends? Yasemin Soysal in her work (1994) has offered a broad analysis of the array of domestic and international factors which have generated new developments. These include the changing nature of membership in the modern world, increased flows of labor migration to Europe in the postwar period; European changes in the matter of national sovereignty and identity, particularly within the European Union; the increase in international organizations and international regulations, including the dissemination of an international discourse of human rights. David Held has argued that in the European Community “any conception of sovereignty which assumes that it is an indivisible, illimitable, exclusive, and perpetual form of public power -embodied within an individual state - is defunct” (1995: 412). He too points to the rise of international law that has arisen to constrain national governments. For example, the European convention on Human Rights created human rights legislation that, in principle, was transferable across national borders without restriction, was not subject to large variations of national legislation, and was guaranteed by supranational institutions limiting the sovereignty of the state. A recent article on the European Court of Human Rights remarked on the ire provoked when the court ruled against British legislation.¹⁴ International conventions, agreements, and directives expanded the rights of foreigners even if it did not eliminate discrimination against non-nationals or foreign residents. While the European human rights convention extended protection to non-nationals, it still was premised on the distinction between national and non-national.¹⁵ Such factors have mediated the previous power of traditionally national determinants, such as state institutional arrangements, political and cultural tradition, domestic social structure, historical context, geography, or colonialist legacies.¹⁶

Likewise, the emergence of regional and other new social movements in the sixties and seventies helped to introduce new conflicts, agents and referents in citizenship. The formation and experiences of immigrant or minority communities introduced changes in ethnic and multicultural politics. The extension of universal suffrage to women, and the extension of social rights within the citizenry may be considered simply as extensions of existing citizenship institutionalization. However, the issues of women's rights, minority recognition, and identity that arose in the new contexts have also been considered as incapable of being handled by the existing institutions. Social movements in West European politics as elsewhere sharply critiqued the limited universalism of liberal or republicanist democratic citizenship. They have critiqued the capacity of state citizenship to deal with pluralist politics (cf. Mouffe 1992; Castles 1994:4, 7). Feminists continue to argue that women have not experienced the full membership, equality, and standing of citizenship (Young 1990; Yuval-Davis 1991). Taken as a whole, the new social movements have striven to redefine the import of national parameters and institute new referents of transnational, local, and international membership. Regardless of outcomes, they also introduced new agents, including women, foreigners, racial or ethnic minorities, and transnational movements and organizations.

Yasemin Soysal's institutionalist analysis of membership and immigrant incorporation in

Europe identifies a general, pervasive transformation of the European state institutional framework. Soysal contends that contemporary citizenship developments are indicators of an emergent "postnational membership". Indeed, numerous changes in citizenship do reconfigure national citizenship in *postnational directions*. The emergence of these trends are evident in a variety of state policies, international discourse, public definitions, and collective action. They move membership beyond the parameters of a particularistic, territorial, or nationally-bound citizenry. Frequently, the conflicts associated with such developments have international or transnational origins. They are often defined as struggles over identity, where the authority status of the nation-state either is contested or deemed less relevant than other criteria. Sources of the logic driving these changes have been both domestic and international. A closer examination of recent developments can provide a better understanding of emergent postnational trends.

One of the more salient developments has been the proliferation of citizenship reforms. Some have been highly politicized while others less so. Revising citizenship laws is not novel. What has been striking about the current spate of reforms is the new kinds of convergence visible among the European states, including a loosening of citizenship regulations. Numerous Western European states have passed various kinds of expansionist reforms of their naturalization, citizenship, dual nationality, and voting rights policies. Belgium and the Netherlands, for example, revised their laws in 1985, supplementing their traditional descent or lineage-based criteria for membership with qualified territorial rights to citizenship. They facilitated naturalization and dual nationality, and extended local suffrage to long-term foreign residents. In 1991, Belgium granted the automatic acquisition of citizenship to children born in Belgium of foreign parents. Germany facilitated access to German citizenship in 1991 and 1993, and other states have enacted similar revisions (Çinar 1994). The expansionist nationality reforms point in the direction of postnational membership in several ways. Reforms facilitating access to citizenship can modify the ties between national identity and formal citizenship. Facilitating the acquisition of citizenship also enables in practice the increasing incidence of multiple memberships. The reforms arose in the aftermath of postwar labor migration to Western Europe. They acknowledged, albeit reluctantly and only recently in certain cases, the permanent immigrant settlement in these polities. It is important to note that characterizing these reforms as expansionist or leading to postnational outcomes does not delimit the varied politics driving these reforms.

Consider more closely the phenomena of dual nationality. Multiple nationality has traditionally been discouraged and banned by states.¹⁷ Nevertheless, the incidence of dual nationality in Western Europe continued to rise, and is now estimated in the millions. Gender equity reforms, and transnational migration and immigrants, who retain the nationality of their countries of origin, account for part of the growing numbers. Several West European states in the past decade or so have changed their national laws to permit dual nationality. In fact, according to Dilek Çinar, "the availability of dual nationality has now become a matter of course in Western Europe," with some exceptions (1994:62). In 1992, it was estimated that 18-19 million legal foreign residents are living in Western Europe, up from 5 million in 1950. Thus, the incidence of dual nationality will increase (Fassman and Münz, 1994:5). Even those states long opposed to dual nationality have softened their opposition. With close to 2 million Turks in Germany, Germany and Turkey have engaged in inter-state discussions about dual nationality. This phenomena is not specific to Western Europe alone.

For example, debates have arisen in Mexico over enabling dual nationality for Mexican nationals in the United States. Likewise, both Turks in Berlin and Mexican immigrants in California have engaged in their own campaigns for the right to dual nationality; and at the same time, for the right to vote in their countries of origin, and still again, for the extension of voting rights in their place of residence, regardless of their nationality. The emergent fluidity of memberships - local, national, and transnational - has meant that citizenries are less defined by one state border or identity.

Dual nationality breaks with the logic and practice of national state citizenship. For disparate sets of reasons, the European Parliament has called for EU member states to permit dual nationality, the Swedish and French governments struggled to rescind the 1963 Strasbourg convention - a treaty to discourage dual nationality - in the Council of Europe; unlike the Swedish, the French efforts were driven by government officials and French emigrant groups who bemoaned the inequities of the legitimate dual national status of a Franco-non-European, such as Franco-Algerians, and the problematic dual national status of a Franco-European, such as Franco-German, who they considered "culturally closer". On the other hand, Portugal in 1981, loosened restrictions on dual nationality for its numerous emigrant groups abroad, who did not want to forfeit Portuguese nationality. In a very different context, Germany allows ethnic Germans (Aussiedler) who acquire Germany nationality to retain their previous citizenship. Regardless of the intentions of policy makers, therefore, the proliferation and legitimation of dual and pluri-nationality transforms the function of citizenship.

Beyond nationality revisions, the practice of extending rights and benefits to non-citizens - in other words, citizenship rights without citizenship - has signaled important changes in the institutionalization of citizenship. In Western Europe, long-term foreign residents have the economic, legal, and social rights of citizens, including rights to welfare, social service, unemployment, medical insurance. Nor are such access and rights limited to long term foreign residents. While asylum seekers, short term foreign residents, and those without legal papers have certainly been in a more precarious status, they too have been granted more rights. This has meant in part that state citizenship has become less determinative; it matters less. Tomas Hammar and other scholars have called the new rights for long term foreign residents, "denizen" rights (Hammar, 1990; Layton-Henry, 1990). Other interpretations have classified contemporary policies granting "denizen" style rights as extensions of national citizenship. For example, suffrage has been a right traditionally associated with formal legal citizenship, and conflict over suffrage was a key feature in national citizenship development. Rainer Bauböck has called the extension of voting rights to foreigners an extension of citizenship. But, I would argue, the effect of these policies do not really extend citizenship to foreigners along the logic of national citizenship. The extension of local suffrage to non-nationals translates into more fluid national boundaries, but does not transform the status of foreigners into a status analogous to that of previously disenfranchised classes within these polities. Overlapping citizenship rights can extend from subnational to transnational levels, and cut across several categories of citizens and foreigners. For example, European Union citizenship covers nationals of those member states. At the same time, several European states had already extended local suffrage rights to their long term foreign legal residents. Further, select dimensions of European Union citizenship, such as the right to appeal to the European Union Ombudsman, can actually extend to all legal residents within the Union, not only EU nationals.

For Soysal, the enactment of legislation granting rights or facilitating incorporation on criteria other than formal citizenship status is an important indicator of an emergent postnational model of membership. She cites that one of the emergent bases for extending rights rests on the notion of "personhood", the foreigner is considered a person, a human even if not a national. Soysal links the extension of rights for non-nationals to the concurrent rise of human rights discourse and policies in international and transnational regimes and to transformations in state sovereignty (1994: 140-143). The principle of personhood is a postnational norm, in so far as it is not based on institutionalized national status nor generated by the state; however, the policies and discourse about human rights need not originate outside the state.¹⁸ In European states as in the United States, national courts have played important roles in striking down government actions to restrict rights and benefits as violating human rights of these people, regardless of their citizenship status¹⁹. In the case of the passage of the 1993 French reforms on immigration and citizenship, the French Constitutional Council ruled that some aspects of the government's legislation violated the rights of foreigners as individuals. As the lead article in *Le Monde* stated, "foreigners are not French but they are people." At the same time, international organizations as well have called for the protection of the human rights of foreigner populations.

The decoupling of membership ideologies from formal state citizenship has been another indicator of a reconfiguration of citizenship. As immigration and citizenship became politicized topics, immigrant activists and others have attempted to redefine the national identity. They talk about transnational loyalties or multiple memberships, rather than a singular citizenship. In fact, numerous immigrant associations have pursued explicit and self-conscious kinds of "postnational" strategies, such as calling for new citizenship, voting rights for foreigners, and the disassociation of citizenship and nationality. The impetus to disassociate citizenship from nationality has long been advocated by immigrant activists who claim the right to engage in "citizenship" activities in the locality where they live while retaining their nationality. Interestingly, one can consider such logic was appropriated by the European Intergovernmental Conference of 1992 in its formulation of a European Union citizenship. In other ways, the questions of membership and identity raised in the contemporary wave of citizenship politics recall those raised by feminist and other social movements. They are not subsumed easily under traditional conceptions of citizenship rights and obligations.²⁰

Finally, European Union citizenship is certainly not delimited to the nation-state. Part of the drive underlying the new EU citizenship has been that the European Union is giving its member nationals the new status to generate loyalty and identity to itself, to the European Union. From this perspective, EU citizenship can be considered not simply as complementing national membership, but displacing national citizenship. Some scholars argue that to speak of a European identity challenges "nationalist conceptions of political citizenship" (Turner, 1994:157; Habermas, 1994:20-35). Examining the emergence of different social and political rights in the European Community, Elizabeth Meehan has argued that once we separate citizenship from nationality, "the European Community can be thought of as, and already is, a polity in which more than one set of standards can be invoked - a kind of three dimensional framework for the exercise of the rights, loyalties, and duties of citizenship" (1993a:173).²¹ As a whole, European integration process continues to shift

decision-making upward. At present, many rules regarding labor flow, population movements, social policies, and rights are being defined at level of European Union institutions, including the Commission, Council, and Court.

Postnational developments are not simply extensions of national development of citizenship. They break with its logic by moving citizenship beyond or outside of the parameters of a territorial nation-state. They underscore how citizenries are no longer bounded as they once were. However, even as postnational reconfigurations of membership and trends have been the product of both international and domestic processes, other reconfigurations and trends have also arisen. From a postnational perspective, nationalist and exclusionary dimensions of citizenship development are backlash phenomena. They are often considered reflective of old persistent national membership models. They are reactionary trends and not new in a significant way.²² But, are the constrictive trends in citizenship development an indicator only of resistance by the old order? Postnational arguments can appear to imply an irreversibility to the diminishment of national membership. They they can underestimate a reconfiguration of national membership that resembles national citizenship. Institutional arguments also relegate specific political responses as secondary to the institutional outcomes. Yet, the political processes of membership, immigration, and citizenship policies have generated new political conflicts and debates, with institutional implications. The intensity and kind of political responses in the new European citizenship politics has varied considerably, even when outcomes have appeared convergent, such as with nationality reforms. Indeed, the contrasting types and intensities of political response appear to be an important site to examine in order to fully understand the new citizenship politics and its ramifications.

The emergence of what I call *neonational* membership can be discerned in current citizenship developments, and in particular, in the political processes of the new citizenship politics. The term, neonational, is used to distinguish these trends from the existing national order of citizenship and from traditional nationalist trends. Neonational membership is a reconfiguration of cultural, national, even supranational boundaries to ensure new closures. Like postnational developments, neonational trends too break with the logic of extension within a bounded citizenry; they too involve boundary settings within or beyond the national territorial state. In other words, if one defines traditional state citizenship as delimited by the formal state, neonational membership may encompass a larger transnational space outside the state or a smaller cultural space within the state. Neonational reconfigurations of membership often are assemblages of nationalist sources and state citizenship traditions. Yet, they demonstrate the malleability of such sources and citizenship.²³ As with postnational outcomes, this set of developments has been shaped by cross-cutting transnational factors as well as specific domestic processes. And, it too can be examined in each of the central dimensions of citizenship.

Alongside the slew of expansionist nationality reforms have come several important constrictive revisions of membership. France in 1993, for example, culminated a ten year national debate on citizenship with a restrictive reform of the Nationality Code. The 1993 revision tightened France's traditional territorial criteria for citizenship. It required that second generation immigrants - those born and raised in France of foreign parents born elsewhere - file formal requests to become French - to integrate into French national community. The reform also restricted the applicability

of other territorial criteria, which had facilitated attribution of citizenship to its postcolonial populations. In Britain, the Nationality Act of 1981 formalized a series of efforts to redefine British nationality in a newly and narrowly national and culturalist bounded citizenship (Cesarani, 1996). In the United States, the national Republican party has recently called for the repudiation of the scope of the (post-civil war) 14th Amendment so to deny birthright citizenship to children born in the United States of foreign parents who either are not legal or long term foreign residents. Constrictive reforms point in the direction of neonational membership in several ways. The reforms reinvigorate a bounded citizenry by breaking with the historical national order, such as breaking with long-standing precedent, revising historical criteria, or creating new boundaries. Of course, the rhetoric of the reforms may stress that they are the culmination of historical loyalty. As a practical effect, the reforms are often exclusionary and not expansive reconfigurations of citizenship. They may buttress the new cultural and racial nationalisms.

Recent efforts to restrict and rescind the institutionalization of citizenship rights without citizenship can be considered a response to ongoing postnational trends. These efforts cut across the different levels of overlapping memberships, to include the undocumented or “illegal” immigrants, marginalized asylum seekers, “denizens” or longer-term foreign residents, as well as others with ties to the old national membership order. For example, there have been crackdowns against illegal immigration in numerous European countries as well as specific efforts aimed at asylum seekers. Britain’s Immigration and Asylum bill in Fall 1995 called for restricted access to services for certain groups of asylum seekers. The rightist Germany party, Christian Social Union (CSU), called for payment cuts to refugees and asylum seekers.²⁴ Thus, even when citizenship as a status has appeared to matter less, new patterns of exclusion have arisen. They are constituted by boundaries that are both within and without the nation state.²⁵ In this respect, neonational membership is not solely domestic. Like postnational membership, it has domestic consequences, but also transnational implications.

Efforts to define national membership in exclusive, cultural nationalist terms have been visible across Western Europe. The efforts are often spearheaded by far right groups in Europe. The sharp rise of far right nationalist, anti-immigrant parties in many Western European states has been dramatic. But, the generation and promotion of culturalist rhetoric and restrictive access spans the political spectrum. Its logic is not defined solely by the nation-state. For example, the rightist rhetoric about citizenship in the French debates drew variously on human rights discourse and the right to difference, and a culturalist Europe. Likewise, left and centrist proponents of citizenship reform drew from reconstructed national traditions of citizenship and transnational references. These efforts have been characterized as the “new nationalist republicanism” (cf. Lorcerie 1994; Favell, 1997; Feldblum, 1997). The integrationist strategies of immigrant associations in France also coincided with the logic of the new citizenship reforms. The President of France-Plus, a politically active immigrant group, approved of the stress on national integration of immigrants and the definition of national identity advanced by a national Commission on Nationality: the Commission upholds “the republican model, the values of the Revolution . . . they propose to reinvigorate the Francophone space”(interview in *Liberation* 1/9-19/88). While Francophone space implies the extension of French membership, the actual reform of 1993 entailed an exclusion of the traditional Francophone citizens. The reform sharply curtailed the privileged *lien* - in terms of “double jus

solis” of former colonial populations.²⁶

The conflation of citizenship and immigration issues, and in particular of immigrant, national membership and identity issues has been another dimension of neonational developments. There are now 10-13 million Muslims living in Western Europe, a significant portion of whom are nationals of European countries; the largest populations are 5 million in France, of whom at least 2 million are French nationals or dual nationals, 1 million in Britain, of whom most are nationals, and 2 million in Germany, of whom almost none are nationals. During highly visible affairs - including the Rushdie affair in Britain, and the Islamic scarves affair in France - the issue became in part the suspected transnational memberships of the resident Muslim population. The links between citizenship and immigrants have become both more salient and obscured in Europe and elsewhere, because certain immigrants - whether illegal, legal, or citizens - are considered foreign and “illegitimate”, be it their origin or religion that is rendered suspect.

Indicators of an emergent neonational membership are visible across Western Europe in the efforts to tighten and restrict access into the countries; what has been called by some the phenomenon of a Fortress Europe. Interestingly, part of that rhetoric derives its logic from transnational trends often associated with postnational outcomes. Arguments for Fortress Europe have included reference to Europe’s right to be different, that is its cultural and historical rights. In other words, the promotion of a culturalist Europe has drawn upon an international discourse of rights and identity. Other arguments are based on the new political economy of the postwar order so that European states are said to be responding in necessary ways to the pressures generated by the internationalization of markets and the globalization of labor. National closures are now built on similar foundations. For example, efforts to create a “fortress America” have translated into actual construction of a concrete walls and wire; they are also built on “English only” legislation that seek to uphold America’s “rights” to difference and identity.

Thus, boundary setting and closure have taken place at various levels: access for immigrants within the polity, national citizenship, national borders, and international borders. There is, in fact, a dynamic between the increasing membership fluidity and new closures. For example, the language of European integration speaks of “l’espace homogene”; the phrase could be translated as a “border-free territory”, but it also contains the meaning of a space without foreign elements. While Germany and other states have facilitated access to citizenship, they have dramatically closed off physical access to themselves. Germany, in 1993 dramatically restricted its refugee policy, and accelerated deportations. In fact, the deportation of asylum seekers and undocumented immigrants generally has increased in European countries. In France, governmental efforts to deport hundreds of African immigrants in the summer of 1996 became a national crisis when 300 immigrants sought refuge in a Parisian church, with some undertaking hunger strikes. The legal status of many African immigrants had become complicated following the restrictive immigration and citizenship revisions of 1993. By late August, government officials had retreated somewhat from their hard line position by declaring that about a third of the targeted immigrants would be allowed to remain in France. They argued both the European implications if their efforts failed and the fact that the Council of State - the institution that in the past defended the “human rights” of immigrants - upheld their right to expel the immigrants. The crisis over the African immigrants clearly highlighted the exclusion

of immigrants from ex-colonial territories from French membership. Besides humanitarian concerns, protestors decried the constriction of French “national” boundaries, as one Mali immigrant argued, “we’re here to stay . . . for us, we’re not immigrants. We are in our native land.”²⁷

The locus of authority in neonational membership, unlike traditional citizenship, is not limited to the nation-state. Earlier, European Union Citizenship provided an instance of postnational membership. Yet, an alternative interpretation is also possible. European citizenship has been based on a strong presumption of national citizenship, and is most frequently understood as complementing the national memberships of its member states. In fact, for the upcoming revision of the Maastricht Treaty, all member states as well as the European Parliament and other European entities proposed explicit clarifications to that effect, that EU citizenship supplements without replacing national citizenship. At times, to speak of an European citizenship or identity has been to construct Western Europe as an historical-organic collection of nation-states necessarily banded together to protect their cultural particularities (cf. Martiniello, 1994; Ferry 1992). Even those efforts formulated for the “promotion of European citizenship” can be redefined to promote cultural particularities. For example, the project of “Europe in Fifteen Towers”, sponsored by the European Pegasus Foundation, revolves around schools in the 15 member state adopting local monuments and then creating collages of the monument pictures. The press release for the project asked, “. . . But the European citizens, will they feel more European?” The solution according to this project were selected monuments, many religious and patriotic in nature, to discern the constituent components of the “European” culture and identity.²⁸ Thus, EU citizenship and European identity can be understood as a reformulation of nationalist ideas. Notwithstanding the strong opposition of many nationalist parties in Europe to the European Union, the integration process can be seen as redrawing the lines around a culturalist and physical Europe so to ensure the exclusion of non-European foreigners. An exclusion that actually can no longer be effectively or easily accomplished at the level of the nation-state.

Neonational trends are more than replays or extensions of national and nationalist developments. They can break with the logic of the historical development of national citizenship. Their referents and parameters extend beyond the state. They underscore innovative confluences of identity, citizenship, and immigration issues.²⁹ To summarize the arguments thus far, I have identified two distinctive trends in citizenship development. The first being the reconfiguration of national state citizenship in terms of postnational membership, and the second the redefinition of national membership in terms of neonational membership. Are postnational and neonational memberships competing, contradictory developments? The answer is not straightforward.

From the different types of evidence given here, there are at least three ways in which the two sets of developments are causally linked. First, in some respects, the developments are like two sides of a coin, shaped by the same phenomena. Thus, the rise of transnational forces, new social movements, and changing demographic, political, and economic factors have produced postnational phenomena as well as neonational pressures. Second, several recent developments in the direction of neonational membership have constituted a response to emergent postnational reconfigurations of membership. Finally, at times, both sets of developments appear as components of what Yasemin

Soysal has called the “dialectic of the post-war global system”, which refers to the “institutionalized duality between the two normative principles of the global system: national sovereignty and universal human rights (1996:24). However, I would argue that it is not clear whether the causal relationship between the two developments is in fact that of a dialectic, which denotes an internal dynamic and ultimately a new singular synthesis. Instead, as contrasting responses to a common set of phenomena or even as backlash, the relationship between the developments could be that of a dualistic series of responses and interactions, which would indicate development in different directions. Nevertheless, what is striking are the ways in which they present a type of convergence today. Broadly put, convergence is visible in numerous areas, including nationality revisions, changing incorporation policies, and the creation of the European Union citizenship. Yet, despite convergent or common outcomes, clearly divergent citizenship strategies have shaped the process.

Convergent Outcomes, Divergent Strategies

Why focus on citizenship strategies? There are several reasons for this. First, strategies highlight the interactions of political actors, institutions, and ideologies. In other words, they bring the political process of citizenship developments back into focus. A focus on strategies, therefore, illuminates one of the factors contributing to changing citizenship in Europe. I argue that identifying and understanding the divergent strategies sharply qualifies the current convergence. I do not contend in this paper that divergent citizenship strategies constitute the sole explanation for new citizenship developments. As noted earlier, an array of factors, including broad structural and institutional changes, have shaped the new developments. Finally, citizenship strategies underscores the actions pursued by a variety of actors on the tiered and cross-cutting levels of contemporary citizenship, including national, subnational, transnational, and specifically European levels. In the following cases, I aim to identify the dominant sets of citizenship strategies. Clearly, neither the domestic nor European citizenship politics have featured monolithic strategies, but I am interested here in those strategies or ways of pursuing membership issues and priorities, which helped define the outcomes. In the following pages, I examine the dominant citizenship strategies in three instances of apparent convergence: nationality reform and incorporation policy, using the 1993 French and German cases, and the establishment and ongoing revision of EU citizenship.

Consider more closely the nationality reforms enacted by Germany and France, each of which modified the traditional order. In Germany, citizenship traditionally has been based on lineage criteria or the rules of *jus sanguinis*, whereby one is automatically attributed German citizenship if one’s parents or ancestry are German; if not, then a procedure of naturalization must be undertaken. Thus, “Ethnic Germans” from Russia and other parts of Eastern Europe are granted citizenship automatically upon entry into Germany. At the same time, second and third generation immigrants of Turkish origin born in Germany have neither been attributed citizenship at birth nor automatically given it at any point later on. Under the citizenship law, they must undergo a naturalization process and renunciation of their previous citizenship to obtain German citizenship. In France, the Nationality Code contained a mixture of territorial and lineage criteria, whereby second generation immigrants - those born in France of foreigners born elsewhere - acquired French citizenship semi-automatically at their majority; and third generation immigrants - those born in France of foreigners born themselves on French territory - were attributed French citizenship at birth.

Recent reforms indicate that whereas Germans now discuss moving toward a combination of descent and territorial criteria and lessening the ethno-cultural presumptions of citizenship, the French have moved toward a tighter combination of territory and descent and increased the culturalist connotations of citizenship. As the Germans seek a type of "French solution" to citizenship processes, the French seek greater political and cultural closure.³⁰ The direction of the French and German reforms does not only contradict rhetoric about their respective "national models", it also points to a convergence of sorts in citizenship policy. Yet, the strategies driving the two reforms are at odds with each other.

For the past several years, the German government has continued to institutionalize a liberalization of naturalization procedures and conditions for both long-term foreign residents and foreigners born and raised in Germany. A 1991 "Act Amending the Aliens Law" gave these groups a claim to naturalization. In July 1993, new revisions, which were in many ways a reiteration of the earlier liberalization, gave both groups an "absolute entitlement to naturalization", in other words, a right to citizenship.³¹ The most recent German naturalization revisions came amidst several events that accentuated the absence of citizenship access for Turkish foreigners and long settled immigrants: the continuing attacks against foreigners in Germany, the large influx of ethnic Germans who are granted German citizenship automatically, the unification of East and West Germany, and the government's passage of a severely restrictive asylum reform. Facilitating naturalization was considered partly compensation to immigrant workers and the families long settled in Germany, in particular those originating from Turkey, who had been targets of firebombing. Opening the door to German citizenship was also compensation for political support for harsh closures at the border. Chancellor Kohl in June 1993 asserted that German citizenship law, whose foundations date back to 1913 and are based on solely lineage criteria, needed radical overhauling, and underscored the case of second generation youth.³²

While the Kohl government held back from introducing a legislative proposal at that point, other parties including the major opposition, the SPD, and the centrist party, the FDP, floated citizenship reforms. Since that time, citizenship reform has become an increasingly salient topic in German national politics, with the German far right parties and movements generating a rhetoric of German identity and anti-immigrant sentiments. At stake in the policy debates since 1993 have been the institution of qualified territorial criteria for citizenship for foreigners born in Germany, and the acceptance of dual nationality; also debated has been the extension of local suffrage and other civic rights to all long-term foreign residents (and not only EU nationals).³³ Turkish immigrant associations have called for easier access to Germany citizenship, but their other priorities are the extension of local suffrage and the availability of dual nationality. In June 1996, Germany's Commission for Foreigners predicted that legislation to enable dual nationality for second generation immigrants, would pass the Bundestag because a majority of parliamentary members support such a reform.

German strategies and debate have been situated in the context of dispersed memberships within and beyond Germany. By dispersed memberships, I mean to refer to different levels of formal and informal membership, including intra-national as in Eastern or Western German or Ethnic

German; also national as in German national or foreign national, and transnational, as in European national, or ethnic or religious identifications. The reasons for these varied dispersed memberships and their particular salience in Germany are several. First, German reunification and the influx of ethnic Germans generated cultural dissonance within the imagery of German citizenship. It also created pragmatic dissonance. For example, ethnic Germans are permitted to retain their nationality of origin. Second, the changing German immigration and citizenship policies have been formulated with reference to the European Union. For example, the 1993 revision of the asylum law in Germany was partly propelled by the restrictive Dublin accords on asylum as well as by restrictive crackdowns on asylum seekers instituted by other West European countries. In addition, given that second generation immigrant youth in some other European countries accede to citizenship more easily, German laws have transnational implications. Germany itself has also been divided about EU citizenship; while 65% of western Germans view themselves as both German and European, less than 50% of eastern Germans do so (Eurobarometer March 1996). Third, Germany has embarked on a series of bilateral negotiations with Turkey on issues such as dual citizenship. Likewise, immigrant activists in Germany stress transnational integration, such as dual nationality and voting in Germany and Turkey, rather than singular citizenship.

In certain ways, therefore, the dominant effect of recent citizenship strategies in Germany has been an evasion of the parameters of national-cultural membership. Strategies of singular cultural citizenship have not been the predominant focus. Indeed, it is arguable that the increasing political support for dual nationality by some is a form of resistance or preventative measure against a more substantive reconfiguration of German citizenship. Since 1989 in particular, the dominant German strategies in citizenship politics have become increasingly dispersed. It is important to note that the array of actors contributing to the general emergence of dispersed citizenship strategies in Germany have been driven by variagated, and often, competing concerns and interests. To differing degrees, the German government, federal and state officials, political parties, far right, domestic and transnational immigrant movements, and European level groups have all contributed to the shape of German citizenship strategies.

At the same time in 1993, a newly elected French government passed a restrictive revision of the French nationality code.³⁴ Since the early eighties, there have been a series of intensifying electoral and policy debates over the criteria and meaning of citizenship. Far right leaders and immigrant activists, conservatives and socialists all have debated the relationship between immigrants (in particular those of North African, Muslim origin) and French citizenship. Over the past years, the leading parties in France have supported a new commitment to integrationist voluntarism in citizenship. The 1993 French reform reflected the changed political commitments to citizenship. It modified the mode of nationality acquisition to require that second generation immigrants - those born and raised in France of foreign parents born elsewhere - file formal requests to become French.³⁵ That is, the state now demands a voluntaristic step by these youth. More controversial were the parts of the new law which restricted access by excolonial populations. The law rescinded a 1974 reform that extended the territorial criteria for citizenship access to the children born in France of parents born in former French colonies before their independence. The 1993 reform also restricted the provisions as they concerned Algeria, which until its independence, was considered a French department, not simply a colony. For Algeria, the government established

new conditions of prolonged legal residence in France for the parents in order for "double jus soli" - third generation attribution - to apply to their children born in France.³⁶

In contrast to Germany, French strategies were situated within a context of a culturally singular integrated membership within France. While the actual nationality reform only took place in 1993, French citizenship strategies were already shaped by the debates, conflicts, and policy efforts of the previous decade. For example, the 1987 Nationality Commission, established to review the proposed nationality code revisions of 1986, held publicly televised hearings. And, it ultimately issued a report that combined a defense of national identity, an insistence on a national integration of immigrants (the "French" model), the valorization of a voluntarist citizenship, and a reaffirmation of statist perspectives.

A dispersion of public memberships, as in public multicultural membership, was explicitly rejected in the French conflicts. While the debates featured acknowledgment of European integration, any sort of European identity was defined in supplemental terms. From this perspective, a series of tiered memberships were visible in France: private identity, public French citizenship, and supplemental European membership. Though immigrant associations in France have also pushed for the extension of local suffrage to foreigners, and the decoupling of nationality and active citizenship or civic engagement, some of the most visible immigrant groups during the citizenship reform conflicts promoted cultural and national integration. Thus, the Commission's report was hailed by the left and right, including immigrant associations who applauded the integrationist appeal of the Commission. The Commission's recommendations did not differ much from the Rightist 1986 proposals, and in fact, laid the groundwork for the 1993 reform. Overall, culturalist and centered interpretations of membership were the dominant French strategies.

The emergence of German and French multicultural policies can provide another example of the different dominant strategies. Multicultural incorporation policies are another indicator of the changing institutionalization of membership. They may suggest that identity and incorporation are no longer situated at the level of the nation-state or within a bounded citizenry. But, multiculturalism itself is ambiguous. For example, in describing multiculturalism in Australia, Stephen Castles has written, "multiculturalism maintains that it is no longer necessary to be culturally assimilated to be an Australian citizen (1994:7)." Nevertheless, from an Australian perspective, and more generally from the perspective of traditional state citizenship, access to formal citizenship is the first step of multicultural citizenship. Indeed, in Australia and Canada, multicultural policies are closely linked to formal citizenship acquisition campaigns (e.g. "Year of Citizenship" in Australia).

In Germany, on the other hand, many multicultural policies are tied to foreign nationality groups, residence or activity, and not to a rhetoric of nationality acquisition or national integration. Multicultural policies in Germany are not aligned with efforts of "national community". Consider a multicultural billboard put up by the Mayor of Solingen after the firebombing of a Turkish family's house, in which five women and children, were killed; some of whom were second generation immigrants in Germany. The board read, "Your Christ (is a) Jew; your auto Japanese; your pizza, Italian; your democracy, Greek; your coffee, Brazilian; your vacation, Turkish; your numbers,

Arabic; your letters, Latin; . . . and only your neighbor is a foreigner?" On the one hand, the multiculturalism underlying this public campaign fragments and externalizes immigrant identity. It depoliticizes their membership. On the other hand, the campaign assumes fragmentedness and foreignness of cultures. In effect, it bypasses the nation-state membership to configure a new model of postnational incorporation.

The domestic processes in Germany constructing citizenship politics provide further insight into the determinants of postnational transformations of citizenship. Postnational citizenship outcomes in Germany have been shaped, at least in part, by the interaction of historical rules, institutional practices, and political strategies. Germany's traditional understandings of membership presumed a strategy of maintaining a closed national community based on ethnicity, which is not easily open to reconfiguration. On the other hand, Germany's existing corporatist state structure has provided foreigner groups such as the Turkish population with collective recognition and social and economic incorporation into the existing order. Given their status and relation to the state, immigrant groups in Germany have pursued incorporation strategies that use their transnational linkages and resources, rather than those which aimed as primarily integrationist into some type of national community, neither an open nor profitable alternative.³⁷

In contrast, changing politics of French formal citizenship policies were very conducive for cultural nationalist arguments. "Republican nationalism" was constituted at once as political tool and legitimate analytical model in France. The French statist institutionalization of citizenship diminished the opportunities for the recognition of immigrant populations as collectivities. It encouraged the bifurcation of a political individualism in the national community and private identities. Thus, multiculturalism in France has been closely tied to the promotion of "national integration" of immigrants; multicultural public citizenship is explicitly rejected. Whereas in Australia the content of national citizenship expands, in France, the identity and transnational referents are redefined either to coincide with French cultural parameters or to be relegated external to citizenship. French state multicultural policies have supported items such as "ethnic festivals" and at the same time insist on the public predominance of a individualist, distinctively French model of citizenship. In contrast to an incorporation that bypasses the nation state, multiculturalism in France has the effect of reifying a supposed national model of state citizenship. Immigrant strategies reflect this configuration of constraints and opportunities. For groups like France Plus, a Franco-Maghrebi electoralist association, the strategies are primarily integrationist and complement dominant rhetoric, even as their frame of references include more transnational human rights or immigrant rights emphases.

Taken together, the nationality reforms and multicultural policies in Germany and France demonstrate the importance of identifying the divergent strategies in the current convergence of European citizenship policies. Dissimilar, even competing, strategies are also visible in another dimension of apparent convergence in Western Europe: the creation and continuing push for European citizenship. While talk of a European citizenship or European identity can be traced throughout much of the period of European integration, efforts to propose a formal category accelerated in the nineties (Meehan, 1993; Ugur, 1995; Martiniello, 1994; Triandafyllidou, 1995) The 1992 Maastricht Treaty of the European Union (TEU) established the status of European

Citizenship. Every citizen of an EU state was now also a citizen of the Union. For EU member state citizens, that meant that the scope of citizenship has expanded, and in some ways converged as well. EU citizenship entailed the new extension of local and European voting rights to all foreign residents who are citizens of other member states; and the right to stand as a candidate in those elections. Other rights gathered or created under EU citizenship include rights to free movement and residence, rights to consular protection by EU member states, and the right to appeal to an European Ombudsman about “maladministration in the activities of Community institutions”.

The extension of these rights to third country nationals in the European Union was not addressed by the new citizenship category. Since its inception, some politicians and commentators have called for the extension of EU citizenship to these foreign residents. The article on the European ombudsman in the Maastricht Treaty (Heading II, Part 2, Article 8e) does extend the citizenship; complaints to the European Ombudsman may be made by “any person, regardless of whatever nationality, who resides in a member state.” (Ibid, 1996: Part I.3). However, the entire article was oriented towards widening rights of EU nationals, rather than extending EU citizenship to non-EU nationals. The extension of EU citizenship in such directions has not appeared to be a popular cause (Martiniello 1994:31-32; Triandafyllidou 1995; Ugur, 1995:988). For some commentators, EU citizenship accentuated the inconsistencies among and within states with regard to its foreign resident populations.³⁸

Thus, the category of European citizenship for European Union nationals acquired more substantive content, and gave citizenship rights for these populations some transnational consistency. But, the existence and future potential of citizenship rights tied to the European Union also acquired more resistance and ambiguities. Certainly, complete opposition to any sort of European citizenship can be found across the European states for disparate sets of reasons and in particular as voiced by some far right and nationalist groups.³⁹ Yet, the support for EU citizenship also brings into focus the operation of divergent sets of citizenship strategies in the seemingly convergent outcome of a supranational membership. As one of the topics under discussion in the current Intergovernmental Conference (IGC) on the European Union Treaties - on the revision of the Maastricht Treaty - European Union (EU) citizenship has attracted much explicit attention. As evidenced in documents produced in preparation for the IGC, varied strategies are pursued by subnational groups, parties, and movements, national governments, transnational movements, and organizations, as well as specific European Union institutions and groups.

The calls to enlarge and strengthen European citizenship have gained particular visibility. Proposals to establish a generalized citizenship have been increasingly advanced by a diverse set of transnational and EU-level groups. Some of the proposals include calls to incorporate non-EU nationals in EU citizenship and to disperse European citizenship through a series of practices and rights. For example, a European socialist youth initiative calls for the extension of European Citizenship, “granted to non-EU citizens who live in the Union the right to work under the same conditions as EU citizens” (1996:3).⁴⁰ The Civil Society, an organization representing 70 non-governmental “progressive democratic” organizations, called for “A guarantee of civil rights for all (men, women, nationals, immigrants), and any other person who is legally resident in any of the member states . . . which will mean real status at the European level for Non-Governmental

Organizations, and a recognition at the European level of the right of association. . . .”⁴¹ The European parliament has been another source of strategies to expand and disperse citizenship rights. The European Parliament reflection group (Messina Group) in 1995 called for the expansion of EU citizenship to spell out the “fundamental rights” covering citizens and third country nationals in the European Union. A minority among the group “proposed that the citizens of third countries established in the Union be given a special status with certain rights (right of free movement and right of residence) (1995: section 38). The EU Federation of Green Parties issued a stronger statement: “The citizenship of the Union must be extended to all legal residents . . . As the citizens of the Union depend on national regulations of citizenship, these must be revised to allow a system of dual nationality (1996: section 4B).”

A majority of the states in the European Union also appear to support a strengthened EU citizenship, but mainly for member state nationals.⁴² They call for the incorporation of new rights, including a “charter of European Citizenship,” would provide for the protection of fundamental rights. Germany has endorsed a stronger and “better defined” statement on fundamental rights and civil liberties. Italy has proposed the incorporation of civil and social rights. The Belgian government would include adherence to the European Convention of Human Rights and to a Social Charter under EU citizenship. All the Benelux countries called for the revision to include clauses supporting the principle of language equality and cultural diversity. The French government, while much more opaque on the issue of EU citizenship, declared it wanted “to better guarantee citizenship rights.”⁴³ They all stressed the tiered nature of EU citizenship, proposing to make explicit that European citizenship “supplements, but does not replace, state citizenship”. The “Presidency Conclusions” (Italy) presented at the Florence European Council in June 1996, called for the next Presidency to prepare a draft revision of the treaties that would include “strengthening European citizenship, without replacing national citizenship and while respecting the national identity and traditions of the member states. (P. 6)”.

Britain has continued to offer the starkest dissenting voice. A British White Paper on the subject, certainly in accordance with Britain’s longstanding opposition to supranational trends, states the British government “does not consider . . . that the European Union is the right context for the protection of fundamental human rights . . . or prohibiting discrimination . . . the Government is concerned that the creation of rights would eventually lead to pressure for reciprocal duties . . . (such duties) have not been developed . . . and they should not be . . . The European Union . . . is not a state, and should take care not to develop ideas which feed people’s fears that it has a vocation to do so (1996: Sections 55, 56, 58)”. Advocates for European citizenship have tried to counter such critiques. Jacques Delors, former President of the European Commission, has argued that “criticism of the idea of a European citizenship is unjustified. I have always felt that nations will survive; they are a natural reference point and will remain so . . . But European citizenship will emerge through a process and will be subordinated to national citizenship, It will represent common territory in the form of social and citizenship rights and a feeling of belonging to a wider community without tearing down national feelings of affinity (Delors, 1995).”

Most the proposals for expanding and strengthening EU citizenship rely on dispersed strategies or centered and tiered strategies. Not surprisingly, among those who support European

citizenship, transnational actors and organizations have pursued more dispersed strategies, by which I mean the generalization of citizenship practices among different membership spheres. In current proposals, some suggested practices include more associational rights on the European level, and increased anti-discrimination rights. In contrast, member states have pursued more tiered-style strategies, by which I mean the extension of citizenship rights (except for fundamental rights) based upon a centered (and central) state citizenship. The strategies trace the expansion of EU citizenship through several tiers of membership, from local, regional, national to transactional and European. Thus local citizenship is linked to European citizenship, and European citizenship is usually premised on national citizenship. From this perspective, the distinctions between dispersed and tiered strategies in the European context roughly invoke the distinctions sketched out earlier between the dispersed and tiered citizenship strategies in Germany and France. At the same time, it is worthwhile to note the trend toward “dispersing” citizenship for EU nationals through a variety of practices. Already the Maastricht treaty envisioned dispersed practices of voting for European Union member state nationals in national, local and European elections. Majority acceptance for tiered and dispersed citizenship as they pertain to EU nationals is visible in EU member states. Eurobarometer surveys of European and national identity show that in most member states (12 of the 15), the majority is willing to see themselves as identified with the national identity, and then with the European identity; the exceptions were Britain, Finland, and Sweden, as well as eastern Germany. In only six member states - Luxembourg, Germany, Belgium, France, Italy and Spain - are more than a fifth of the population willing to identify themselves first with the European identity and then with the specific national identity. According to another Europinion poll, 77% of the respondents thought that strengthening EU citizenship with a “European Charter of the Rights and Duties of the Citizen” was a “good thing”. Furthermore, a majority supported the extent of local and European election suffrage to other EU nationals (Europinion, #6, October 1996, section 6).

That dispersed citizenship strategies have been confined to intra-European Union nationals has had institutional and political implications. Mehmet Ugur contends that different strategies become available when issues become more “transparent” and “divisible”, and public pressure or assertiveness increases (1995:970-971). According to Ugur, the decoupling of the issue of EU citizenship and rights for European nationals from the issue of non-EU nationals has enabled the continued push for EU citizenship (pp. 992-994). At the same time, the continued rise of anti-immigrant parties and movements and the linkage of the so called illegal migration problem with all aspects of immigration in the domestic politics of the member states have disabled the pursuit of dispersed or tiered strategies with regard to non-EU nationals. Ugur notes that extension of rights to third country nationals have been considered by the European Commission and other bodies. But, the predominant policy trend has been marked by harsh immigration and asylum measures and the “exclusion” of third country nationals. Member states have pursued centered and statist strategies to coordinate the international closures to non-EU nationals. Such strategies shaped Dublin Accord, the Schengen Accord and its modifications, as well as the continuing negotiations of the Working Group on Immigration (Convey and Kupiszewski, 1995:940-943; Ugur, 1995) There are indications of “an emergent European identity defined against non-EU nationals . . . EU nationals not only are less inclined to see the rights of third country immigrants being tackled at the European Union level, they also tend to be in favor of restricting those rights or leaving them as they are (Ugur, 978).” Taken together, tiered and dispersed strategies for European citizenship expansion (for EU nationals)

have been buttressed by centered or statist and persistently nationalized citizenship strategies for the constriction of immigrant access.

These divergent strategies intersect in interesting ways with the current debate between “intergovernmentalists” and “multi-level governance” or “new polity” analysts about the nature of governance in the European Union.⁴⁴ Intergovernmentalists have stressed national state coordination of European policy, and the domestic constraints and preferences that shape policy. Multi-level governance analysts have stressed the emergence of subnational and supranational actors, and understand European policy formation as defined by conflicts involving “contending coalitions of governments, supranational actors, and domestic interests” (Hooghe and Marks, 1996:36). At the same time, this terminology is also part of the political talk of Eurocrats and European politicians. The analytical and political dimensions of the debate easily blur. For example, in preparation for the 1996 IGC, The General Assembly of European Municipalities and Regions issued a declaration that calls the coming revision of the Maastricht treaty “a decisive state in the transformation of the current intergovernmental Europe in a Europe which is an autonomous political entity” (1996:1). From the perspective of this debate, does European citizenship attest to convergent inter-state policy making? Or, does European citizenship signal the emergence of a “new polity”, namely the European Union, which features multi-level governance?

For certain observers of the European Union, the different dimensions of European citizenship, including but not limited to the formal EU Citizenship created by the Maastricht Treaty, do indeed affirm the emergence of multi-level governance and a “new polity” in Europe. In their study of the European integration process, Hooghe and Marks speak of the “birth of a new polity”. They underscore that the democratic development of the European Union has been “exclusively in one direction: towards the creation of a European citizenship and the upgrading of democratic channels at the supranational level (1996:21).” The initial drive to create and implement EU citizenship and some of the recent efforts to expand it have been characterized as “citizenship from above”, and not a product of mobilization from below (Martiniello, 1994:36; Bryant 1991). Nevertheless, it must be noted that the proliferation of transnational groups and movements pursuing dispersed and tiered citizenship strategies through EU citizenship has been striking, as evidenced through the current surge in proposals to revise European citizenship.

To qualify the question of multilevel governance in terms of the divergent strategies driving European Citizenship presents a more complicated picture. While EU citizenship for nationals has displayed multilevel policy making, the policy making around EU citizenship for non-EU member nationals has been dominated by intergovernmentalist, and state centered policy making (Ugur, 1995). In fact, the development of EU citizenship is constituted by a similar dynamic evident in other citizenship changes. The postnational features of EU citizenship interplay with neonational features. Dispersed citizenship, blurred boundaries and increasingly irrelevant state citizenship are enabled by and enabling centered membership, closed borders, and increasingly relevant exclusionary policies. Overall, member states have pursued centered and statist, even if internationally coordinated, strategies in areas concerning citizenship regulations for non-EU nationals, asylum policy, border control, and entry and residence policies. Within the context of the 1996 IGC, some member states have explicitly proposed transferring authority over immigration and

asylum issues upward, but other states, including France and Germany, have maintained support for more upward but interstate coordination. It is important to note that centered strategies do not imply a continuation of old national strategies; and the pursuit of intergovernmentalist strategies does not mean the absence of multilevel governance. The targeted closures are as much about transnational boundaries as national borders, as evidenced by the Dublin and Schengen accords, and calls for an “espace homogène” in Europe⁴⁵. Moreover, the state-centered and persistently nationalized strategies have been shaped by supranational processes and actors. And, certainly much of the autonomy (even if not sovereignty) over these issues have been shifted to European-level organizations.⁴⁶

Conclusion

The examination of the different citizenship developments brought out varied kinds of citizenship strategies, which were pursued by varied actors. The actors identified here include national governments, political parties, European Union institutions and associated organizations, immigrant associations, and an overlapping array of transnational movements and actors. The citizenship strategies can actually be categorized into two distinctive sets of dominant strategies. The first set are dispersed strategies. The second set are centered and tiered strategies. These strategies do not correspond to static, ideal citizenship models. Rather, they refer to dynamic political processes. While the two set of strategies do not usually overlap, the combination of dispersed and tiered strategies visible for EU nationals demonstrates their flexibility. In the national cases of convergence - the convergence of French and German nationality policies and of their incorporation policies - identifying the different strategies illuminates the impact of the political processes of each of the polities. Divergent strategies explain the apparent convergence between states with historically different membership schema.⁴⁷ In the case of European citizenship, the divergent strategies driving the strengthening and expansion of EU citizenship help differentiate the dual-tracked and mult-leveled political processes of European citizenship and immigration policies. They also help explain how a convergence around a supranational citizenship has continued.

These two sets of strategies - dispersed on the one hand and centered on the other - are integral factors shaping the emergence of postnational and neonational membership trends sketched out earlier. As shown in the case studies, dispersed citizenship strategies have contributed the emergence of postnational membership, while centered strategies have contributed to the emergence of neonational membership. However, generalizations about the actors pursuing these strategies are very difficult to make. Can one assume that national governments (because of the presumption of sovereign interests and preferences) always pursue centered and statist strategies? In the case of German nationality reform and incorporation, I sought to show how and why Germany pursued dispersed strategies. Historical, institutional, and structural factors in part determine the character of the dominant strategies. Can one assume that immigrant associations always pursue dispersed citizenship strategies? Overall, transnational immigrant groups and European level organizations have been more likely to pursue dispersed strategies. But, in the case of French nationality reform and incorporation, I sought to show how some of the most visible immigrant strategies were, in effect, integrationist and centered strategies. Moreover, some transnational movements, such as

European-level movements constituted by numerous far right, nationalist groups, have been diametrically opposed to the incidence of postnational membership. In fact, their innovative use of transnational references and bases, even as they advocate nationalized, singular citizenships, demonstrates some of the novelty of neonational trends.⁴⁸

This analysis does not presume a direct linkage between intentionality underlying the pursuit of different strategies and postnational and neonational membership outcomes. Returning to the example of the integrationist strategies of French immigrant activists, their strategies buttressed the national cultural, centered, and statist strategies that dominated the reform process. But, that does not mean that the intentions of these groups, or of others in the process, coincided with neonational membership. The strategies pursued by EU member states and the actual direction of EU citizenship constitutes another example. On the one hand, the exact character and direction of EU citizenship - whether it is an indicator for postnational or neonational membership - is currently being debated (contrast Martiniello, 1994; Turner, 1991; Habermas, 1994; Bauböck, 1994; Soysal, 1996). On the other hand, most member states have pursued tiered and dispersed strategies to strengthen EU citizenship for EU nationals. These strategies arguably lay the groundwork for a more generalized postnational membership. A future dispersed citizenship extended through different membership levels and groups (denizens, nationals, etc) has not been the intentions of most member states; one could argue that such an outcome would be against both many of the member state interests and preferences at this stage in European integration.⁴⁹

The continuing process of European Union citizenship also provides further evidence of the causal relationship between the postnational and neonational developments in Europe. The dualistic trends of postnational and neonational membership have constituted new dynamics of a glancing convergence. Constrictive revisions of entry and membership rules, creation of transnational and international closures, obsessive preoccupation with national models, and increasing salience of anti-immigrant politics rebound off the growing incidence of dual nationality, increased citizenship rights for non-nationals, emergence of transnational norms, and the erosion of the "imaginary walls" of the Western nation-states. The divergent sets of citizenship strategies underscore how old conceptual frameworks of citizenship and national identity can obscure the emergence of new dynamics. I have sought to show in this paper that as the nature of citizenship has changed, an array of actors have pursued strategies shaped from multiple sources: the still existing order of national citizenship as well as the emergent developments of postnational and neonational membership. In turn, these strategies have contributed to the ongoing dualistic developments and the moments of convergence. Finally, as seen in the cases of nationality revisions, incorporation policies, and European Citizenship, the interplay of these strategies continue to have domestic and transnational consequences.

ENDNOTES

1. This chapter addresses changes in citizenship and nationality policy. While the terms, citizenship and nationality, are technically and ideologically distinctive, they are often used interchangeably in popular discourse. Here, I distinguish the terms when appropriate, and otherwise, use them interchangeably.
2. The scope of this paper is limited to Western Europe. The proliferation of citizenship reforms, however, is very visible among the new states in Eastern Europe and the former Soviet Union. See, *Migration News*; Çinar, 1994; de Rham, 1990; Brubaker, 1989.
3. By foreigners, I refer to the broad range of immigrants, including labor migrants, family reunification entries, asylum seekers and refugees, and undocumented migrants.
4. That the concept and practice of citizenship is in flux, and its character and direction contested have been widely discussed. For recent works on the transformations of citizenship in the context of immigration, see Cesarani and Fulbrook 1996; Soysal, 1994, Bauböck, 1994a and 1994b; Kymlicka, 1995; Hammar, 1990.
5. Several recent studies have discussed changes in citizenship in terms of “postnational” or “transnational” trends. For example, see Soysal, 1994:136-162; Bauböck, 1994a: 210-212, 216-221; Hammar, 1990; Ferry, 1991; Habermas, 1994. It also should be stated at the outset that there is disagreement about the terminology. There are several different definitions of “postnational”, “transnational”, and “supranational”. For example, in contrast to the usage of the terms here, Rainer Bauböck reserves the term “postnational” for those phenomena for which nation-state institutions are fully bypassed and irrelevant, and uses the term, “transnational” for those phenomena which extend beyond the nation state and for which nation-state institutions are still presupposed; see Bauböck (1994), and personal communication. For other definitions of postnational phenomena, see Soysal (1994), Martiniello (1994a, 1994b), Ferry (1991, 1992).
6. There are an array of studies that situate changes in citizenship and immigration politics in terms of differentiated national models. See, for example, Brubaker, 1992; Weil, 1992; Hollifield, 1992; Schnapper; also see Schmitter-Hiesler 1992.
7. Some studies have focused on convergent expansionist tendencies, while others have focused on the rise of new nationalisms and racial politics. See Freeman, 1995, on the expansionist convergence of liberal democratic polities. The study of racial politics has become a growth industry. See, for example, Cohen 1994:186-191; Fetke and Webber, 1994; Santamaria, 1989; Husbands, 1991; Anthias and Yuval-Davis, 1992.
8. In other versions of this essay, I have used the term, “neonationalist” membership, rather than “neonational” membership. My reasons for changing the term were largely to avoid confusion the original term provoked. For some readers, “neonationalist” meant to refer exclusively to the extreme Right and new Nationalist movements of Western Europe, which was not the intention here. For other readers, the lack of symmetry with “postnational” meant that “neonationalist” was an evaluative expression, and not a

conceptual category, which, again, was not the intention here. Both postnational and neonational membership are meant to be distinguished from traditional national membership in the course of the essay. My thanks to Christian Joppke for his suggestion of neonational membership.

9. The definition and usage of the term, “strategies,” in this paper are drawn from different sources, including from Ann Swidler’s term, “strategies of action”, which she defines as “persistent ways of ordering action through time” (1986:273), and her understanding of strategies as “larger ways of tying to organize a life . . . within which particular choices make sense, and for which particular, culturally shaped skills and habits . . . are useful” (276). The term also recalls Mann’s (1987) use of the term to delineate historical citizenship patterns. See endnote 10.

10. For example, William River (1986) has discussed the “art of political manipulation” in terms of strategies; thus individuals can “manipulate outcomes by manipulating the agenda” (p. 11).

11. See, T.H. Marshall, “Citizenship and Social Class” (1953: 74-90).

12. The institutionalization of citizenship has been reconsidered since Marshall. For example, For example, writing as a corrective to T. H. Marshall’s configuration of citizenship development, Michael Mann (1987) traced varied historical paths of citizenship practices as constitutive of different kinds of “strategies”. Whereas Marshall identified change in the development of citizenship in terms of the consecutive enlargement of sets of rights (civil, political, social) and the extension of rights to different classes in the nation-state, Mann argued that such a pattern reflected only one kind of strategy. Mann, like Marshall, related the modern development of citizenship to national class conflict and efforts to institutionalize and control such conflict. But, Mann used the concept of citizenship strategies to differentiate ruling class and regime action among the European states: he argued five different types of citizenship strategies were actually visible in different countries and at different points in time: “liberal, reformist, authoritarian monarchist, Fascist, and authoritarian socialist” (1987: 339-341). Bryan Turner (1990) identified state and collective patterns in the development of citizenship; he differentiated the institutionalization of citizenship from above and below; and analyzed “passive” and “active” variations of membership rights and incorporation

13. Marshall, Mann and Turner represent, of course, only one dimension of literature on historical models and understandings of citizenship and citizenship practices as well as on the changes in these models and practices. For a sampling of recent studies, see, Soysal (1994), Bauböck (1994), Brubaker (1989a), Spinner (1993), Barbalet (1988); and Habermas (1992).

14. “Rights Panel Stirs Anger in Britain,” New York Times, 5/6/96:A4.

15. I am grateful to Daniele Lochak for this point.

16. See Zig Layton Henry (1990) on the rights of foreign workers, and Yasemin Soysal (1994) on the influence of international trends on domestic policies.

17. For example, in 1963, ten European states signed the Strasbourg Convention on the “reduction of cases of multiple nationality”. The aims of the treaty were to prevent the further incidence of dual nationality by enumerating the conditions leading to the forfeiture of nationality for a variety of cases. Its aims also were to deal with the already growing problem of male dual nationals and military service. Britain, one of the signatories of the convention, only signed the section regarding military service. The

other signatories were France, Germany, Austria, Denmark, United Kingdom, Sweden, Norway, the Netherlands, Italy, and Luxembourg.

18. For a domestic policy process approach for examining the extension of citizenship rights to non-nationals, see the chapter in this volume by Virginie Guiraudon.

19. In the United States, for example, state and federal courts in California delayed implementation of Proposition 187, the public referendum designed to authorize harsher measures against undocumented immigrants, increase state powers, and rescind rights of undocumented immigrants to education and medical services. In other cases, U.S. courts have ruled that government actions have violated the human rights and due process of migrants. See, Harvey Weinstein, "Rulings could Reopen Many Deportee Cases," Los Angeles Times, 10/10/96, p. 1.

20. For a sampling of the discussions about modern changes in the understanding of citizenship and the growing importance of identity conflicts, see Hall and Held, 1989; Yuval-Davis, 1991

21. Also see Meehan 1993b for a fuller argument; Guild (1996) offers a detailed analysis of the distinguishing features of national and European Union citizenship.

22. While Y. Soysal considers that the "explosion of nationalisms" and new "appeals to nationhood" are part of the "dialectic of the post-war global system", she identifies only one new mode of membership, namely postnational membership, which is the "new mode of membership . . . (that) transgresses the national order of things" (Soysal, 1996:25-26).

23. See, for example, Craig Whitney, "Europeans Redefine What Makes a Citizen," *New York Times*, January 1996; Barbara Crossette, "Citizenship is a Malleable Concept", *New York Times*, 8/11/96, p. E3.

24. For recent and excellent compilations of press reviews of these new efforts and legislation, see "British Immigration Reform," "Italian Immigration Reform", and "Austria: Immigration and Elections" Migration News, Vol. 2, no. 11, November 1995; "British Immigration Plan", "Italian Decree," "Germany: Asylum. . .", "Swedish Guest Workers and Refugees", "Immigration: Top Priority in France," Migration News, Vol 2, no. 12, December 1995; "Reducing Immigration in Britain and Italy," Migration News, Vol. 3, no. 1, January 1996; "Britain: More Safe Countries", "Spain's Grand Bargain", and "Italy: Immigration Decree Not Enough", Migration News, Vol 3, No. 3, March 1996

25. See, for example, James Blitz, "Asylum Benefit Law will starve People out of Britain", Financial Times, 12/19/95; Charlotte Eager, "Exiles Dream of Freedom Turns to Dust," The Observer, 12/17/95; "Bonn Concern at Asylum Seekers", Financial Times, 1/11/96; Ying Hui Tan, "Asylum Seekers Can Only Make One Claim," The Independent, 12/24/96.

26. See below for a more detailed discussion of the 1993 reform.

27. Cited in Mort Rosenblum, "France Views African Immigrants," (AP News Briefs, 8/16/96), also see "Hunger Strike Divides French Ruling Coalition" (Reuters, 8/20/96); and "Juppe Rejects African Immigrants' Demands" (Reuters, 8/22/96).

28. Press Release, "Europe in Fifteen Towers," Summit of Heads of State and Government in Florence, 21-22 June 1996.

29. Christopher Husbands (1994) argues that the contemporary debates over citizenship, including the nationalist rhetoric, is a function of displacement of new "moral panics" about European resilience and national identity .

30. Based on the author's interviews in Germany, March 1994.

31. The Federal Ministry of the Interior, Survey of the Politic and Law Concerning Foreigners in the Federal Republic of Germany (July 1993), p. 38. The 1991 amended Aliens law facilitated naturalization procedures and gave the groups a claim to naturalization (p. 8). The July 1993 revisions (the "Act to Amend the regulations Governing Legal Questions of Asylum Procedure, Work Permits and Aliens Law") further diminished the discretionary features of the naturalization process, and specified an absolute right to naturalization, as long as the applicants fulfilled the necessary conditions (pp. 37-39); On November 23, 1995, Germany's Foreigners' Commissioner, Cornelia Schmalz-Jacobsen released a report on the status of foreigners, which reiterated that certain groups of foreigners had the right to German citizenship (Migrant News, January 1996). Nevertheless, the substantive advance of the 1993 revisions over the 1991 reform can be dependent on the particular Laander administration.

32. Kohl, in a speech to the Bundestag (6/16/93) stated "we should change our citizenship laws so that the possibility of naturalization is more heavily used. "I am thinking primarily of the young Turks who have been born here, who see Germany as their home, and would be prepared to perform the duties of a citizen in our democratic state". While Kohl announced that his party, the CDU (Union of Christian Democrats) would submit a legislative proposal to revise the 1913 Citizenship law, no proposal was actually submitted to the Bundestag. On the other hand, in Spring 1994, the major opposition party, the SPD (Social Democratic Party), introduced a legislative proposal for discussion in the Bundestag, which introduced modified territorial criteria for citizenship. The SPD reform has the general support of the centrist FDP (Free Democratic Party), and is opposed by the CDU and rightist party, CSU.

33. On recent debates on citizenship reforms and dual nationality, see Rittstieg (1994); "Euro-foreigners have right to vote in Berlin Municipal Poll", Agence France Press, 10/20/95; also Alan Cowell, "Turks Seek Acceptance of Culture in Germany," New York Times (12/14/95) and "For Turks, Life (or Death) in Germany still offers no respite," New York Times (12/8/95)

34. Legislative proposals to reform the French Nationality code have been electoral stakes in French national politics since 1986. But, citizenship issues were already salient in French politics after 1983.

35. Under the existing Code of Nationality, children born in France to foreigners acquire French citizenship quasi-automatically at the age of eighteen. Under the new law, youth between the ages of sixteen and twenty (two) would have to "manifest their wish" for French citizenship.

36. Journal Official, 12/31/93; Philippe Bernard, "Nationalite Francaise, nouveau mode d'emploi", Le Monde, 1/1/94.

37. An episode that highlights such strategies are the recent local elections in Berlin, where Turkish immigrants called for, at once, the right to dual nationality, local suffrage for all non-nationals in Berlin, and suffrage in Turkey for nationals living abroad, in Germany

38. For an detailed analysis of the new EU category and its possible ramifications for third country nationals, see Triandafyllidou 1995; also Guild, 1996.

39. But, note that numerous European far right parties do not feature blanket opposition to European integration or unity; rather, there can opposition to the specific characteristics of the European Union or the direction of the current integration process.

40. "A Letter from Brussels: 217 European Young People ask for European Citizenship 'for all'" (at the initiative of the Socialist Groups of the European Parliament), 1996, 3 pp.

41. Permanent Forum of the Civilian Society. *A Warning to Governments* (21 June 1996).

42. See European Commission, *La Citoyennete de l'Union (Fiché thematique)*, Intergovernmental Conference, 1966, 3pp. Also see *Position of the Italian Government on the Intergovernmental Conference for the Revision of the Treaties*, 18 March 1996; *Statement by the German Government, Ministerial Meeting of the Intergovernmental conference*, 22 April 1996; *Belgian Government Paper to the Parliament concerning the IGC '96*, October 1995, Section 10; Greece's contribution to the 1996 IGC, "For a Democratical European Union with Political and Social Content," March 22, 1996, Section 4; White Paper, "A Partnership of Nations. The British Approach to the European Union IGC 1996," March 1996, Sections 55,56,58.

43. See *Débat à l'Assemblée Nationale sur la CIG. Discours du ministre. Delege aux affaires européennes*, M. Michel Barnier. Declaration du gouvernement. 13 March 1996, Paris, 8pp.

44. For an overview of the debate, see Hooghe and Marks, 1996; Pierson, 1996.

45. See the "Déclaration du Chancelier Helmut Kohl et du président Jacques Chirac au président du Conseil européen", 6 December, 1995, p. 2.

46. See David Held, 1996, p. 411 for a discussion of state autonomy as capacity and state sovereignty as authority.

47. In contrast, cultural political explanations that rely on mostly static citizenship models and historical membership idioms are often unable to explain reforms and politics that flout or manipulate historical traditions. See for example Brubaker (1992), and for a more extensive critical discussion of political-cultural approaches, see Feldblum (1997), chapter 5.

48. For example, commenting on the recent electoral success of his far right, "Freedom Party", in the elections for the European Parliament in Austria, the Austrian nationalist politician Jörg Haider focused on the possibility for a new pact among rightist politicians in the European Parliament to fight against the Maastricht Treaty and the European Union as the way in which European integration should progress ("Far Right Wins High Marks in Austria Vote," *Los Angeles Times*, 10/14/96; also see, Eric Frey, "Austria: Right wing gains in European Poll," *Financial Times*, 10/14/96).

49. For recent discussions about the need to look beyond intergovernmentalist intentions to explain outcomes in European integration processes, see Hooghe and Marks (1996), Pierson (1996), and Schmitter (1996).

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