

Foreigners or Citizens?

Citizenship Policies in the Countries of the EU

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Marc Morjé Howard
Assistant Professor
Department of Government and Politics
University of Maryland
3140 Tydings Hall
College Park, MD 20742
phone: 301-405-4118
fax: 301-314-9690
email: mhoward@gvpt.umd.edu

Abstract: This paper seeks to integrate the study of citizenship into the main theoretical and substantive debates within the field of comparative politics, by means of an empirical study about how and why citizenship policies vary across the countries of the European Union. The paper discusses four distinct theoretical approaches to citizenship, and then presents systematic empirical evidence from the 15 EU countries, in order to assess the predictive accuracy of each of the theories. It argues that a historical institutionalist approach seems to provide the best explanation for the national distinctiveness that remains, while also accounting for some of the partial change that has taken place in several countries.

Note: This is the first paper of a larger project. Please do not cite or quote any portion of this paper without permission.

Introduction

The purpose of this paper is to take a first step toward integrating the study of citizenship into theoretical and substantive debates within the field of comparative politics, by means of an empirical study about how and why citizenship policies vary across the countries of the European Union. More concretely, the paper includes three main objectives: 1) to *characterize* clearly how the 15 EU countries determine their criteria for membership and naturalization; 2) to *categorize* these criteria in comparison with one another, thereby capturing the range of national policies, and the extent to which they have been converging in recent years; and 3) to *explain* the existing cross-national variation, by evaluating four competing theories about citizenship based on the evidence.

The paper is divided into four main sections. I start by justifying the importance of focusing on citizenship, contrary to the claims of some scholars who argue that globalization has undermined the significance of political citizenship as the basic foundation of the modern nation-state system. I then present four different theoretical perspectives on citizenship—which I label national community, globalization, domestic liberalism, and historical institutionalism—each of which has distinct predictive consequences, particularly on the question of whether an ongoing convergence process is taking place.

In the third section, I introduce comparative evidence from the countries of the EU, providing a breakdown of the four main elements of a country's citizenship policy—whether or not it allows for citizenship by birth, the relative ease or difficulty of its naturalization

requirements, whether or not it allows naturalizing immigrants to hold dual citizenship, and its naturalization rates—for each of the 15 EU countries. Moreover, by comparing these four elements for each country in both contemporary period and in the 1980s, I am able to consider the extent to which an actual convergence process has been taking place. Then, in the fourth main section, I assess the four theories based on the empirical evidence. The analysis shows that, of the four theoretical approaches, a historical institutional approach seems to provide the best explanation for the national distinctiveness that remains, while also accounting for some of the partial change that has taken place in several countries. Finally, I conclude very briefly with some reflections about the implications of these findings for future research on the topic of citizenship.

Why Citizenship Matters

Despite the fact that citizenship is the most basic and fundamental starting point of a democratic polity, the concept has been relatively neglected by empirically-oriented political scientists. The study of citizenship has largely been restricted to the field of normative political theory, in which it has been a flourishing theme over the past decade. Political theorists have already produced valuable contributions, new perspectives, and heated debates on the concept and practice of citizenship (Benhabib 2001, 2002a, 2002b; Beiner 1995; Carens 1995; Kymlicka and Norman 2000; Miller 2000). Yet compared to such topics as political institutions, the welfare state, public opinion, and civil society—all of which have spawned multitudes of careful comparative studies—the empirical dynamics surrounding citizenship remain vague and poorly understood. This section attempts to justify an empirical and comparative study of citizenship by

making the case that a country's citizenship policy has important political, economic, and social consequences—even in the era of globalization.

Writing in an altogether different era, Aristotle in the *Politics* (1941:1247b-75a) raised questions about citizenship that are still very relevant today:

The state is a compound made of citizens; and this compels us to consider who should properly be called a citizen and what a citizen really is. The nature of citizenship, like that of the state, is a question which is often disputed: there is no general agreement on a single definition: the man who is a citizen in a democracy is often not one in an oligarchy.

Even leaving aside modern-day oligarchies, and focusing on liberal democracies, the recent developments of globalization, large-scale migration, and the decline of many elements of nation-state sovereignty make Aristotle's questions appear downright timely.

On the most basic level, citizenship bestows upon individuals membership in a national political community. In liberal democracies, it gives them the right to vote, to run for office, and to participate freely in public activities, while also requiring the obligation of paying taxes and possibly serving in the military. In terms of the larger international community, citizenship serves as what Rogers Brubaker (1992:x) calls "a powerful instrument of social closure," in two respects. First, the boundary of citizenship allows rich states to draw a line that separates its citizens from potential immigrants from poor countries. Second, it allows states to create internal boundaries that separate citizens from foreign residents, by associating certain rights and privileges with national citizenship (see also Torpey 2000:154-157).

Citizenship therefore evokes a fundamental paradox within liberal democracies, namely, what Seyla Benhabib (2002a, 2002b) calls "the paradox of democratic legitimacy." Liberal democracies are based on universal language of fundamental human rights, along with the free

association and participation of “the people,” yet they also must delineate clear and enforceable borders and boundaries. This refers not only to territorial borders, but also to the boundaries of political membership. Determining who is included in the concept of “the people” also implies at least an implicit understanding of who is excluded.¹ In essence, the paradox is that liberal democracies are “internally inclusive” while remaining “externally exclusive” (Brubaker 1992:21).

In a major contribution to the study of citizenship, T.H. Marshall (1950) developed a model of citizenship based on the experience of industrialization and the expansion of democracy a century ago. Although that model is no longer quite appropriate for today’s world, it still raises questions that are relevant for contemporary debates about the future of citizenship. Marshall argued that the extension of rights and benefits go in a specific historical sequence as democracy develops and expands, starting with basic *civil rights* (freedom of conscience, protection of property, and some associational liberties), leading eventually to *political rights* (to vote, hold office, speak and associate freely), and finally culminating in *social rights* (to form labor unions, and eventually to receive the many social benefits that welfare states provide). The argument is compelling, and it fits the historical experience of Western Europe quite well.

In recent decades, however, the welfare state has expanded in a way that defies Marshall’s logic. In most liberal democracies today, wide-ranging civil, but also social, rights are extended to almost all workers and legal residents, even if they are not citizens, and therefore do not have political rights. In other words, political rights are no longer a prerequisite for social rights. Moreover, in an increasing number of places in both Western Europe and North America,

¹ Historically, of course, many groups—women, slaves, non-Christians, non-property owners, and others who would fit Kant’s (1996 [1797]:92) category of “mere auxiliaries to the commonwealth”—have been excluded from citizenship in democracies. Cited by Benhabib (2002b:451-452).

non-citizens are being granted local or regional (but not national) voting rights.² At the same time as this *sub*-national political participation has been expanding, citizens of countries that are members of the *supra*-national EU can now choose to vote in European elections in their EU country of residence, rather than their country of origin.

While Marshall's sequencing may no longer apply to the contemporary situation, many scholars agree normatively with his emphasis on social rights as the ultimate priority and objective. But this has, in turn, led many to proclaim the current or impending empirical irrelevance of citizenship in the nation-state. According to this argument, since social rights can now be achieved without political rights, and since an increasing number of political rights are now available on the sub-national and supra-national level, national citizenship no longer matters in this new, post-national era (Soysal 1994; Sassen 1996, 1998; Jacobson 1996).

In my view, however, it is far too early to dismiss the relevance of the nation-state and political citizenship, for a number of reasons. First, the right to vote and run for office in national elections is still extremely consequential. Non-citizens, even if they are permanent residents and long-time workers, have no opportunity to participate in the democratic process on the national level. Since citizenship, immigration, and asylum policies are generally implemented on the national level, this means that non-citizens are excluded from decisions that may directly affect their own lives.

Second, despite exaggerated claims that social rights are guaranteed to all regardless of political citizenship, in many countries non-citizens are excluded from significant social benefits. For example, five of the nine provinces in Austria do not provide their social assistance programs

² See Aleinikoff and Klusmeyer (2002:48-49) for a list of countries and regions that allow different forms of franchise for non-citizens.

to people who are not citizens of Austria or another EU country. Many other countries place significant restrictions on new immigrants, particularly third-country nationals (non-EU citizens), who often receive lower benefits, and in many cases are barred from noncontributory social programs for a certain number of years after arrival (Aleinikoff and Klusmeyer 2002:67-68). In short, while the modern welfare state undoubtedly provides greater benefits to immigrants than at earlier points in history, non-citizens still receive significantly fewer social rights than do people with national citizenship.

Third, although citizenship is generally not relevant for most private-sector employment,³ it is still very important in the allocation of public sector jobs. To give a few examples, the U.S. government can restrict such postings as public school teachers, state troopers, and probation officers to American citizens; France only accepts French or EU citizens in railway, postal, and hospital jobs; and in Germany, government service employment positions in such areas as public transportation and education is restricted to German or EU citizens (Aleinikoff and Klusmeyer 2002:71-72). Within the EU itself, it should be added that, while citizens of an EU country can automatically live and work in another EU country, third-country nationals generally only have the right to reside and work in the country into which they have immigrated.

A fourth reason why political citizenship is still quite significant has to do with the eventual integration of immigrants into the host society. Critics of immigration often complain that immigrants make little effort to integrate themselves—and in some cases this may be accurate—but the key analytic point here is that immigrants who become naturalized citizens are likely to become much more integrated in “their” new country than those who remain non-citizen

³ Nonetheless, discrimination against non-citizens in private employment is not unheard of, and immigrants are generally in less secure positions than citizens. Moreover, family members of immigrants are often excluded from working altogether, even in the private sector, for a certain number of years (e.g., four to eight years in Austria) (Aleinikoff and Klusmeyer 2002:67-68).

residents, or “denizens” (Aleinikoff and Klusmeyer 2002:9). In other words, leaving aside normative questions about the desirability of increased immigration and/or naturalization, political citizenship can serve as rough measure of integration.

Finally, a related reason why political citizenship remains pivotal has to do with the demographic situation in the advanced industrialized world, and in particular the future of pension systems throughout the countries of the EU. Without a dramatic change in the old-age dependency ratio, along with significant structural changes, most of the pension systems will be facing an “unsustainable financial burden” within 10-15 years (European Commission 2002:11-12). Although increasing the immigration and naturalization rates would by no means solve the problem—and, of course, it might create new political problems, including a xenophobic and extreme-right backlash—it could certainly contribute to an easing of the pension crisis by increasing the number of working-age contributors. Moreover, given that the naturalization of immigrants often leads to their greater integration, it is quite possible that political citizenship would be a factor in the future stability and sustainability of the impending demographic and pension crises in many EU countries.

In short, whether in terms of politics and elections, welfare state benefits, public-sector employment, social integration, or demographics and pension systems, national citizenship remains an essential and enduring feature of modern life. This does not mean, however, that citizenship has the same form and meaning across countries. On the contrary, Aristotle’s assertion that “the man who is a citizen in a democracy is often not one in an oligarchy” could now be rephrased as “the person who is a citizen in one democracy is often not one in another democracy.” Indeed, there has historically been great variation in how different countries attribute and grant citizenship. The question is whether that cross-national variation is still

holding strong today, or whether it is diminishing, as many nation-states (particularly in the EU) are coming together on so many other issues. The next section turns to several theoretical approaches to citizenship, all of which have distinct predictive implications about a possible convergence of citizenship policies.

Theoretical Approaches to Explaining Variation in Citizenship Policies

Although the comparative study of citizenship remains underdeveloped, by drawing in part on several key studies of immigration policy—a closely-related topic—one can identify competing theoretical approaches that would predict different types of cross-national variation in citizenship policies. This section discusses four such arguments, which can be labeled national community, globalization, domestic liberalism, and historical institutionalism. After developing these arguments and their predictive implications in this section, the following section presents new comparative evidence from the countries of the European Union, in order to assess the extent to which each of these arguments applies.

National Community

In one of the few studies that focuses directly on citizenship, Rogers Brubaker contrasts the French and German conceptions of citizenship and claims that a country's historical path to state-building—territorial in the case of France, ethno-national for Germany—creates a deeply-rooted and enduring tradition of what constitutes the national community. Brubaker writes that “Citizenship in a nation-state is inevitably bound up with nationhood and national identity,” and he suggests that a country is unlikely to change its citizenship policy, since “Proposals to

redefine the legal criteria of citizenship raise large and ideologically charged questions of nationhood and national belonging” (1992:182). In other words, although for Brubaker the key to understanding the origin of a country’s conception of nationhood is historical and institutional, his argument is largely *cultural*, since he stresses the lasting power of that *idea*, and its ability to prevent any significant reform of citizenship policies.

While the specifics of Brubaker’s argument address France and Germany, it can be extended in more general terms in order to generate relevant predictions for a wider set of countries. According to this argument, the multiplicity of historical experiences of state-building have created an equally wide variety of conceptions of nationhood and belonging, which are so deeply-rooted that they are resistant to change. In other words, despite the development of supranational institutions like the EU, and despite wider migration flows around the world, the nation-state and its particular idea of membership and belonging, will not disappear (Brubaker 1992:188-189). The predictive consequence of this argument, therefore, is that cross-national differences in citizenship policies will remain impervious to the pressures of convergence that countries have adapted to in so many other areas. In short, a country’s cultural conception of national community explains its enduring and unchanging policy on citizenship.

Globalization

A number of other scholars have developed a quite different theoretical approach to citizenship. Although they stress different factors, they all agree that the process of globalization—which includes unprecedented migration flows, increasing economic and institutional interdependence, and new norms of universal human rights—has been undermining the foundation and authority of nation-states, particularly over the past two decades. To them,

conceptions of national community are no longer relevant, and indeed the very concept of national citizenship itself has been undermined by today's globalized economy and citizenry.

For example, David Jacobson argues that "Transnational migration is steadily eroding the traditional basis of nation-state membership, namely citizenship" (Jacobson, 1996:8). Saskia Sassen stresses both the development of supranational institutions and the breadth of the welfare state in arguing that "when it comes to social services (education, health insurance, welfare, unemployment benefits) citizenship status is of minor importance in the United States and in Western Europe" (Sassen, 1998, 1996:95). Yasemin Soysal (1994) has developed a somewhat different argument, one that emphasizes the recent emergence of transnational and "postnational" norms based on individual human rights of personhood, which serve to undermine the previously dominant system of nation-states. But she comes to a similar conclusion, namely that "As an identity, national citizenship—as it is promoted, reinvented, and reified by states and other societal actors—still prevails. But in terms of its transition into rights and privileges, it is no longer a significant construction" (159).

While the points of emphasis may be different, the general prediction is that—regardless of their traditions of national community—nation-states are becoming increasingly incapable of regulating their immigration flows and citizenship policies, which is leading to the increasing irrelevance of national citizenship and a rapid convergence among the advanced industrialized countries.

Domestic Liberalism

A third type of approach to citizenship stands in stark contrast to the first two. According to what may be called a domestic liberal argument, conceptions of national community are no

longer useful for understanding contemporary citizenship policies, but this is not as a result of globalization or loss of state control. On the contrary, domestic liberals argue that a common process of immigration and citizenship liberalization is taking place for very specific *domestic* political reasons. In other words, while traditions of nationhood have changed, the nation-state still remains the central locus of power and action.

This argument was first developed by Gary Freeman (1995:886), who argues that liberal democracies accept more immigrants than public opinion would support, because of “client politics.” According to Freeman, well-organized interest groups that support immigration—particularly employers and businesses that depend on unskilled workers and population expansion—exert more immediate and direct pressure on policymakers than the more diffuse and poorly articulated influence of the general public, which would otherwise rationally oppose an expansive immigration policy. The result is an “expansionary bias” (1995:882) within domestic political competition that occurs in most liberal democracies, even if they have otherwise quite different political traditions.

Christian Joppke’s approach (1998, 1999) also fits in the domestic liberal category, but he modifies Freeman’s argument by stressing not just democratic politics, but also the legal process. Joppke argues that courts and judges—who are immune to both client politics and public opinion—have consistently supported the rights of immigrants and their families, when they could have clamped down on “unwanted” immigration. This resulted in increasingly liberal immigration and citizenship policies in the United States and throughout much of Europe.⁴

In terms of general predictions about citizenship policies, the logic of the domestic liberal argument would expect an ongoing convergence among liberal democracies, whereby traditions

⁴ It should be noted that Joppke is more sensitive to the variation within liberal democracies—both between the United States and Western Europe, and within Western Europe—than Freeman, since he emphasizes that the U.S., U.K., and Germany have very different immigration histories, leading to lasting variation.

of nationhood become increasingly irrelevant, but nation-states retain their authority to determine and control—but also to liberalize—national immigration and citizenship policies.

Historical Institutionalism

The fourth and final approach to the study of citizenship policies derives from a broader literature in comparative politics that has seldom been applied to the study of citizenship. Historical institutionalists emphasize the importance of “path dependence,” and “critical junctures” from the past, not for predetermining an unchanging future, but for making subsequent change extremely difficult (Steinmo, Thelen, and Longstreth 1992). According to this approach, once established, institutions become “sticky,” and institutional change will require either overwhelming support or very different historical circumstances, both of which are rare. Future developments can and often do put the original institutions into question, but the institutions—and their concomitant policy and cultural responses—tend to become deeply entrenched and self-reinforcing. Nonetheless, it is important to emphasize that according to this approach change *can* happen, and in this respect historical institutionalism is more flexible and dynamic than the culturalist national community argument, since it allows for contingency and what Ira Katznelson (1997) calls “configuration,” to lead to altogether new institutional outcomes.

The only scholar to provide an historical institutionalist analysis of immigration and citizenship is Randall Hansen (2002), who develops a path dependent account for three anomalies that cannot be explained by the globalization and domestic liberal approaches.⁵ Hansen argues that the only way to explain why France allowed the naturalization of 83,000 Algerians in the 1960s, why the United Kingdom tolerated the entry of 200,000 Kenyan Asians

⁵ Note that Hansen refers to the domestic liberal approach as “embedded realism.”

in the 1960s, and why Germany admitted well over 100,000 asylum seekers per year during the 1990s, is to take into account prior institutional arrangements in each of the countries. In essence, Hansen claims that “the rules of citizenship and the nation’s constitution itself” structure and constrain future policy options (280).

While Hansen’s use of historical institutionalism focuses on explaining three specific colonial and asylum anomalies—and, in fact, Hansen otherwise strongly endorses the domestic liberal argument, as opposed to the national community or globalization approaches—one can also make an historical institutional argument in more general terms, to apply to a broader cross-national perspective on citizenship. Accordingly, this type of argument would expect to see much more limited convergence than would be predicted by the globalization and domestic liberalism approaches, but still more change than a national community perspective would anticipate. The key for the historical institutionalist argument is that prior institutional arrangements about citizenship policies—which, as recognized by the national community approach, usually originated during “critical junctures” of state-building—become solidified, self-reinforcing, and difficult to change. This argument would expect, therefore, that most countries have *not* changed their citizenship policies significantly.⁶ And those countries that *have* made changes would be expected to have done so only after extended and protracted domestic debates that most likely only resulted in a partial change or “compromise,” which in many ways still resembles the previous institutional arrangement.

In sum, these four theoretical approaches to immigration and citizenship policies lead to very different empirical expectations, particularly on the question of whether a cross-national

⁶ In this sense, Hansen’s work more closely fits the domestic liberal category, since he stresses the convergence of citizenship policies for domestic, rather than global, reasons. The same would apply to his extensive work in collaboration with Patrick Weil (see Hansen and Weil 2001, 2002; Hansen 1998; Weil 2001).

convergence process is taking place, or whether citizenship policies will remain nationally distinct. While the globalization and domestic liberalism arguments would predict an ongoing convergence in the citizenship policies of advanced industrialized democracies, the national community and historical institutional approaches both tend to emphasize enduring national differences that will defy pressures for convergence. The following section turns to an empirical exploration of citizenship policies in the countries of the European Union—both in the contemporary period and in the 1980s—which will allow us to begin to adjudicate between these competing approaches based on systematic comparative evidence.

Comparative Evidence from the Countries of the EU

The main objective of this section is to conceptualize, measure, and classify variation in the citizenship policies of the 15 countries of the European Union (EU). I focus on this particular set of cases because they constitute a relatively coherent entity, consisting of countries that face similar pressures of immigration and globalization within the common framework of the EU and its institutional and juridical “harmonization.” In comparative historical perspective, however, the citizenship policies of the EU countries have spanned a range of variation as wide as that of the entire industrialized world, ranging from very liberal to quite restrictive. In other words, the focus on the EU provides for interesting contrast and variation within a relatively similar set of cases, thus allowing for a more systematic analysis than would be possible by looking at the entire world or even the European continent.

Much of the empirical study of citizenship has either focused on a small number of countries (Brubaker 1992; Joppke 1999; Feldblum 1999; Fetzer 2000; Rubio-Marín 2000), or it

is concentrated in edited volumes (Nascimbene 1996; Hansen and Weil 2001, 2002; Aleinikoff and Klusmeyer 2000, 2001; Hanagan and Tilly 1999). While the case study approach is certainly valuable, and it allows for a better understanding of the dynamics of citizenship policy within certain key countries, it is unable to trace systematically the variation across the countries of the EU. Similarly, although edited volumes generally group together some outstanding individual contributions, and collectively they cover the recent changes in a wide array of countries, they do not constitute rigorous *comparative* work on citizenship policy in the countries of the EU.

In recent years, several scholars have attempted to provide more explicit and systematic empirical comparisons of citizenship policies across countries (Castles and Davidson 2000; Koslowski 2000). Dilek Cinar (1994) and Patrick Weil (2001) have provided the most detailed empirical analyses of nationality laws in nine and 25 countries, respectively. What is still lacking in both studies, however, is a larger cross-national classification system to make sense of the vast amount of detail, which would allow for a more general categorization of countries. In other words, we still have very little clear understanding of *how* citizenship policies actually vary across the EU countries, going beyond the complex legal and technical specificities of each case, to a conceptual level that aggregates these differences into meaningful and tangible groupings and categories.

The Four Components of Citizenship Policies

In this section, I attempt to provide such a classification, by breaking down each country's citizenship law into four key components: 1) whether or not it grants *jus soli*, or citizenship by birth; 2) the difficulty of its requirements for naturalization; 3) whether or not it

allows naturalized immigrants to hold dual citizenship; and 4) its rates of naturalization. After briefly discussing the significance of each of these categories, I turn to the empirical evidence from the EU, focusing on two time periods: the contemporary period and the 1980s. I provide an overall index that measures the relative liberality or restrictiveness of a country's citizenship policies at both points in time, thus allowing for a consideration of the extent of convergence that has taken place since the 1980s.

(1) Citizenship by Birth

One of the most important elements of a country's citizenship policies involves how newborn children acquire their citizenship. The standard classification that scholars have made involves the distinction between *jus sanguinis* ("law of blood") and *jus soli* ("law of the soil"), with the former indicating citizenship passed down by lineage, and the latter referring to citizenship by birth in a given country. Although these two concepts have often been presented as a strict dichotomy—with countries having citizenship laws based on *either one or the other*—in reality all countries follow *jus sanguinis* (even the classic *jus soli* countries). The crucial test in terms of the relative liberality of a country's citizenship policy is whether children born on the soil of a foreign country will automatically receive that country's citizenship. In practice, there is some variation in the way in which countries grant *jus soli*—some countries allow it regardless of the (legal or illegal) immigrant status of the parents, while others can be more restrictive and impose certain conditions—but the main distinction is between countries that allow for some form of *jus soli*, and those that do not. The granting of citizenship by birth indicates a significantly more liberal citizenship policy.

(2) Naturalization Requirements

Another crucial component of a country's policy on citizenship involves the relative transparency and ease with which foreign residents can become naturalized citizens. Naturalization requirements vary tremendously across countries,⁷ but they do include some common features, the most important of which is the residency requirement, or the number of years a person must legally reside in a country before being eligible to apply for citizenship. Other requirements sometimes include knowledge of the "new" country's language and/or history, sufficient income, good character, the absence of a criminal record, and a loyalty oath (Weil 2001:22-23). While some countries have a very straightforward list of requirements and application process, others allow local or national officials to have the "discretion" to approve or reject the applications of first-generation immigrants, thus adding a considerable amount of uncertainty and arbitrariness to the process. Moreover, in many—but not all—countries, second-generation immigrants (the children of those who resettled in the new country) are granted an automatic right to naturalize (if they did not already acquire it at birth), without having to go through the application process (Hansen 1998).

(3) Acceptance of Dual Citizenship for Immigrants

A closely-related factor involves whether countries allow their citizens to hold dual citizenship, a phenomenon that has become increasingly widespread in recent decades and years.⁸ In practice, dual citizenship takes on very different forms, as some countries have special

⁷ For an extremely detailed, but now already somewhat outdated, account of each country's requirements, see Nascimbene (1996). For a more recent overview of the common requirements, see Weil (2001).

⁸ According to some estimates, the number is as high as five million for Australians (Zappalà and Castles, 2000:56), well into the millions for citizens of the United States (Aleinikoff, 2000:139-140; Spiro, 2002:21), and also at least several million in Western Europe (Feldblum, 2000:478). The potential, and probably impending, liberalization of dual citizenship policies worldwide—along with a steady, if not increasing, rate of international marriages and children—will surely bring these figures up dramatically in the near future (Howard 2002).

bilateral treaties and relationships (especially with former colonies, or culturally “similar” regions). The key distinction, however, is between countries that allow dual citizenship primarily *for their émigrés* who either naturalized or were born in another country and took on that citizenship as well, and those countries that allow *immigrants* to become naturalized citizens while still maintaining their current citizenship (Howard 2002). In other words, there is an important difference between what might be called “emigrant dual citizenship,” which comes at little direct “cost” to the emigrant or “sending” country, and often serves to maintain and promote stronger cultural and linguistic connections to people who reside permanently in another country, and “immigrant dual citizenship,” which allows for the integration of “foreigners” as naturalized citizens who plan to live, work, and settle permanently in the host or “receiving” country. Immigrant dual citizenship is clearly the much higher standard, and it is associated with a more liberal citizenship policy.

(4) Naturalization Rates

In order to get a more accurate sense of the naturalization process and how it varies across countries, it would be helpful to analyze national statistics on the number and type of applications, the percentage of acceptances or rejections, and the reasons why. Unfortunately, however, such detailed statistics are lacking, and the accessible statistics on naturalization rates are often flawed, mainly because of unclear and unsystematic tabulation methods. Nonetheless, it is still possible to examine a rough measure of naturalization rates by calculating the number of acquisitions of citizenships each year as a percentage of the total foreign population in that year. This allows us to move beyond the strictly legal analysis of a country’s policy on paper, in order

to get a rough sense of the extent to which foreigners become naturalized citizens in practice. Higher rates of naturalization will obviously be associated with more liberal citizenship policies.

Empirical Findings

Having discussed the four key components of a country's citizenship policy, we can now turn to the empirical evidence from the countries of the EU. Table 1 presents the variation on each component for the 15 EU countries. The table shows extensive variation on all four components of citizenship policies, with seven of the countries granting *jus soli*, a wide range from easy to difficult naturalization requirements,⁹ nine countries allowing for immigrants who naturalize to hold dual citizenship, and also very different rates of naturalization in the 1990s.

[Table 1 here]

In order to better make sense of this variation, Table 2 presents a citizenship policy index, with the 15 countries divided up into three groups, based on their scores on a 0-8 scale.¹⁰ The table shows that there is quite a wide range of variation in the citizenship policies of EU countries, with six countries—Luxembourg, Spain, Austria, Denmark, Greece, and Italy—maintaining restrictive citizenship policies, while six countries—Ireland, Sweden, Belgium, France, the United Kingdom, and the Netherlands—have rather liberal policies, and three countries—Finland, Germany, and Portugal—are in between. Even within each category, there is generally substantial variation, showing that the EU countries appear to be still very far from holding a common policy—or even similar policies—on citizenship.

⁹ Note that the full breakdown of requirements can be found in Table A3 in the Appendix.

¹⁰ For the full coding procedure, see Table A1 in the Appendix.

[Table 2 here]

While useful in terms of showing how the EU countries compare to one another today, the results in Tables 1 and 2 are from one point in time, and they do not capture the extent to which any change may be taking place. The question of change is particularly important since, as discussed above, both the globalization and domestic liberalism theories predict an ongoing process of convergence.

[Table 3 here]

Table 3 presents the scores for the 15 EU countries in the 1980s alongside the contemporary scores, showing the extent of change that has taken place in the interim.¹¹ The table shows that for eight of the countries there has been no change on the whole. Spain and Finland have both declined by one point, based on somewhat lower levels of naturalization rates in the 1990s. Similarly, France and the Netherlands both increased their scores by one point, based on slightly higher naturalization rates in the contemporary period. More significantly, however, Italy, Germany, and Sweden increased by two or more points, based on actual legal changes to their citizenship policies. Both Sweden and Italy changed their policies on dual citizenship, now allowing immigrants to retain their prior citizenship upon naturalization.¹² In practical terms, this change is especially significant in the case of Sweden, which has very high naturalization rates (an average of 6.6% from 1991-2000), and less so for Italy (which averaged

¹¹ Note that a detailed breakdown for the policies in the 1980s can be found in Table A2 in the Appendix.

¹² Italy changed its law on citizenship in 1992; Sweden's new law went into effect in 2001.

0.5% during the same period). In other words, the likelihood of newly naturalized citizens having the opportunity to take advantage of the new flexible policy on dual citizenship is quite high in Sweden, but very low in Italy.

Germany also made significant changes to its citizenship policy in a new law that came into effect in 2000, resulting in an increase of three points on Table 3. Not only did Germany loosen its naturalization requirements by decreasing the minimum residency requirement from 15 to 8 years, but the new law now allows for citizenship by birth. This change was particularly significant given the long and destructive history that a blood-based definition of national membership has had in Germany. Today, unlike in the 1980s or at any time in German history, children of any nationality—provided that at least one parent has been a legal resident for at least eight years—who are born on German soil now receive German citizenship automatically. Moreover, these children may hold dual citizenship until adulthood, but then they must choose one or the other before reaching the age of 23.¹³ In short, the new law does now allow for a limited version of *jus soli*, and in this sense it represents a remarkable change after decades of exclusive reliance on *jus sanguinis*, but that right may be revoked for people who are unwilling to give up their other citizenship.¹⁴

On the whole, this comparative analysis of contemporary citizenship policies and how they have changed over time shows that only a few countries have made significant modifications to their citizenship policies since the 1980s. Moreover, the differences between

¹³ Since dual citizens must later give up one or the other citizenship, I have therefore coded Germany as “no” on the question of whether it allows for dual citizenship for immigrants. Moreover, adults who become naturalized citizens must still give up their prior citizenship.

¹⁴ It should be added that the new law was a much watered-down compromise of the initial proposal of the newly-elected Schröder government in 1998, which had stressed full dual citizenship as its central objective. The proposal was defeated after a petition campaign against dual citizenship in the state of Hesse gathered over one million signatures. Not only was the government embarrassed by this campaign, but it lost badly in the state elections, costing Schröder his slim majority in the *Bundesrat*, and forcing him to compromise with opposition parties who still claim that “Germany is not a land of immigration.”

many of the EU countries seem to be as large, if not larger, than they were a few decades ago. Based on this evidence, we can now turn to an evaluation of the theoretical arguments developed above.

Assessing the Theories Based on the Evidence

Of the four theoretical arguments about citizenship, the one that receives the weakest support from the evidence is the globalization approach. The empirical findings from the previous section show that states are still capable of regulating immigration and citizenship, which they still do to different degrees and in quite differentiated ways. Furthermore, the analysis demonstrates that nation-states are clearly not becoming irrelevant, and that national citizenship remains an important means of establishing boundaries and distinctions between people—despite increasing migration flows, economic interdependence, and the new norms of universal personhood.

The domestic liberal argument finds somewhat more support, in that five countries have developed more flexible citizenship policies since the 1980s, as opposed to two that have become marginally more restrictive. Also, on aggregate, the average naturalization rates have increased from 2.09% in the 1980s to 2.34% in the 1990s. Moreover, the changes that have taken place seem to vary by country, and therefore to have occurred for domestic, rather than global, reasons. It is quite possible—and certainly not disconfirmed by this analysis—that in the cases where liberalization took place, domestic “client politics” and the legal process were in large part responsible.¹⁵ On the whole, however, the evidence shows that, despite some changes, it is still too early to speak of a convergence process within the countries of the EU. While some

¹⁵ In-depth analysis of the particularly cases is needed to assess this argument more completely.

countries have liberalized, many others have changed little if at all from the 1980s. And a glance at the overall spectrum of the variation within the 15 countries shows that any convergence has been relatively minor compared to the significant cross-national differences that still exist.

The remaining two arguments find more support. The national community approach, which has been resoundingly criticized for the past decade by proponents of globalization and domestic liberal arguments, seems to have more staying power than many had once thought. Many of the more restrictive countries today have historical conceptions of citizenship that are “ethno-national,” while many of the most liberal still maintain their “territorial” traditions. And historical countries of emigration (“sending” states) are still much more restrictive than countries that have at least some history of immigration (as “receiving” states).

Yet, despite its largely accurate prediction of lasting national differences instead of convergence, the national community approach has difficulty accounting for some of the changes that have taken place. Most importantly, Germany—a cornerstone of Brubaker’s original model—has liberalized its citizenship law by partially incorporating a “territorial” component that had long been lacking in its historical tradition, by reducing its naturalization requirements,¹⁶ and by coming close to accepting dual citizenship. Sweden has also made a significant change, by accepting dual citizenship for immigrants, thus breaking with a tradition of citizenship restrictiveness in the Nordic countries. While these two examples, along with the more minor changes that took place in other countries, do not directly contradict the national community argument, they do suggest its predictive inadequacy in terms of accounting for change over time.

Finally, the historical institutional approach seems the strongest in accounting for both the lasting variation and the partial change in citizenship policies within the EU countries. Its emphasis on the path dependent nature of original institutional settlements is supported by the

¹⁶ Moreover, Germany’s naturalization rates have increased steadily in the second half of the 1990s.

fact that most of the countries have made few significant changes to their laws. For those countries that *have* changed their policies, the changes were usually made as amendments or modifications to pre-existing laws, rather than by passing an altogether new law. In other words, the change was often based on terms that were already set by the previous institutions. Moreover, even in Germany and Sweden—the two countries that made the most substantial changes—the debates were agonizing, polarizing, and very much framed in terms set by historical precedents, showing that the change was very difficult, but nonetheless possible.

In short, the evidence on contemporary citizenship policies in the EU, along with an analysis of how they may have changed since the 1980s, give strong support to arguments that stress lasting differences on the national level. Of the four different types of theoretical arguments about citizenship, historical institutionalism seems best prepared to account for the lasting variation, while also making sense of the changes that have taken place in several individual countries.

Such a finding may seem surprising given that the trends in so many other areas and sectors of the European Union have been showing significant convergence over time. This larger convergence has been taking place not only in the realm of human demographics and pension systems, as mentioned above, but also according to a wide variety of economic and technical criteria that have been at the heart of European integration for decades. The finding of lasting and historically-rooted national trajectories of citizenship policies suggests that citizenship gets at a deeper, more fundamental part of a country's national identity and its sovereignty, which even pro-integration political elites are unwilling—or in some cases unable—to do away with. And in terms of larger debates in the social sciences and the media, these findings suggest that, at least in terms of national citizenship within the countries of the EU, the

supposed triumph of globalization and the disappearance of the nation-state have been far too prematurely proclaimed.

Conclusion

In this paper, I have attempted to develop theories about citizenship and immigration policies, with the intent of introducing the study of citizenship into larger debates within comparative politics—from which it has largely been excluded thus far. I have also provided a systematic categorization and comparison of citizenship policies—broken down into four key elements—within the 15 countries of the European Union. Finally, I have shown that a historical institutionalist perspective, which emphasizes the “stickiness” of original institutional arrangements while still allowing for change during certain momentous situations, seems better equipped to account for the empirical reality within the EU countries.

This finding is still preliminary, though, and much more needs to be understood about how and why countries vary in terms of their definitions and implementations of citizenship. Future research should, for example, attempt to spell out in more detail exactly how the changes in Sweden and Germany took place, trace the debates and arguments that emerged around the time of the reform, and show precisely how the new laws differ from those that preceded them. A more in-depth analysis should also pay careful attention to more general and theoretical factors that derive from the broader literature in comparative politics, including structural conditions, supranational and national institutions, cultural traditions, social movements, and elite decision-making. What is clear for now is that citizenship is an important concept that shows no signs of going away, and that should be incorporated more seriously into the field of comparative politics.

Table 1: The Four Components of Citizenship Policies in the 15 EU Countries Today

Country	Citizenship by Birth?	Naturalization Requirements ^a	Acceptance of Dual Citizenship for Immigrants?	Naturalization Rate, 1991-2000
Austria	No	Difficult	No	2.25
Belgium	Yes	Easy	Yes	2.59
Denmark	No	Medium	No	3.54
Finland	No	Easy	No	2.85
France	Yes	Easy	Yes	2.07
Germany^b	Yes	Medium	No ^c	1.15
Greece	No	Difficult ^d	Yes	0.51
Ireland	Yes	Easy	Yes	0.53
Italy	No	Difficult	Yes	0.48
Luxembourg	No	Difficult	No	0.44
Netherlands	Yes	Easy	Yes	7.66
Portugal	Yes	Difficult	Yes	0.24
Spain	No	Difficult	No	1.67
Sweden^e	No	Easy	Yes	6.63
U.K.	Yes	Easy	Yes	2.40

Sources: Citizenship by birth classification and naturalization requirements come from Weil (2001:20-23); see the Appendix for details about what constitutes “easy,” “medium,” or “difficult” naturalization. Classification of dual citizenship for immigrants comes from Aleinikoff and Klusmeyer (2002:28) and the country chapters in Hansen and Weil (2001); see Howard (2002) for more details. The naturalization rate refers to the number of acquisitions of citizenship as a percentage of the foreign population. Data from 1985-96 come from Salt et al. (2000:21,164). The 1997-2000 data were obtained directly from Eurostat. For France, the 1985-1996 rates are all based on the foreign population from 1990; the 1997-98 rates are based on the foreign population from 1999. The 2000 rate for Denmark is based on the foreign population from 2001. The 1999 rate for Luxembourg is based on the foreign population from 1998. The 1998 and 2000 rates for the U.K. are based on the foreign population for 1999. 1991-2000 average is based on all years when an approximate rate could be calculated. All omissions are due to missing data on the number of acquisitions of citizenship.

^a The full breakdown of requirements can be found in the Appendix.

^b Since 2000.

^c Germany now allows for dual citizenship at birth, but requires dual citizens to choose only one nationality between the ages of 16 and 23.

^d While Greece’s residency requirement is five years, it does not give second-generation immigrants the right to naturalize. Moreover, Greece is one of only two EU countries (the other is Denmark) not to have a specific provision for naturalization by marriage (Weil 2001:24).

^e Since 2001. Note that Sweden’s new law was changed too late to be incorporated into Weil (2001), but the data here have been adjusted accordingly.

Table 2: Citizenship Policy Index for the 15 EU Countries Today

Category	Country	Score
Restrictive (0-2)	Luxembourg	0
	Spain	0
	Austria	1
	Denmark	2
	Greece	2
	Italy	2
Medium (3-5)	Finland	3
	Germany	3
	Portugal	4
Liberal (6-8)	Ireland	6
	Sweden	6
	Belgium	7
	France	7
	U.K.	7
	Netherlands	8

Note: Author's classification based on the data in Table 1. See the Appendix for a detailed breakdown of the various components and scoring of citizenship policies.

Table 3: Changes in the Citizenship Policy Index from the 1980s to Today

Country	Index Score in the 1980s	Index Score Today	Change
Luxembourg	0	0	no change
Italy	0	2	+2
Germany	0	3	+3
Spain	1	0	-1
Austria	1	1	no change
Denmark	2	2	no change
Greece	2	2	no change
Finland	4	3	-1
Portugal	4	4	no change
Sweden	4	6	+2
Ireland	6	6	no change
France	6	7	+1
Belgium	7	7	no change
U.K.	7	7	no change
Netherlands	7	8	+1

Note: See the Appendix for a detailed breakdown of the various components and scoring of citizenship policies, for both time periods.

APPENDIX

Table A1: Detailed Citizenship Policy Index for the 15 EU Countries Today

Country	Citizenship by Birth (0 – 2)	Naturalization Requirements (0 – 2)	Acceptance of Dual Citizenship for Immigrants (0 – 2)	Naturalization Rate (0 – 2)	Total Score (0 – 8)
Austria	0	0	0	1	1
Belgium	2	2	2	1	7
Denmark	0	1	0	1	2
Finland	0	2	0	1	3
France	2	2	2	1	7
Germany^a	2	1	0 ^b	0	3
Greece	0	0 ^c	2	0	2
Ireland	2	2	2	0	6
Italy	0	0	2	0	2
Luxembourg	0	0	0	0	0
Netherlands	2	2	2	2	8
Portugal	2	0	2	0	4
Spain	0	0	0	0	0
Sweden^d	0	2	2	2	6
U.K.	2	2	2	1	7

Sources: See Table 1.

Note: Citizenship by birth is coded as either 0 (not allowed) or 2 (allowed). Naturalization requirements are coded as follows: countries that either do not allow 2nd generation immigrants the right to naturalize, or have a residency requirement of at least 10 years, or both, are coded 0 (difficult); countries that have residency requirements of 6-9 years are coded 1 (medium); countries with residency requirements of 5 years or less are coded 2 (easy). See Table A3 for a more detailed breakdown of the various naturalization requirements beyond residency. As for dual citizenship, countries that let naturalized immigrants retain their previous citizenship are coded 2 (allowed), and those that require naturalized citizens to relinquish their prior citizenship are coded 0 (not allowed). Finally, countries with naturalization rates of under 2% are coded 0 (low), countries with rates between 2-4% are coded 1 (medium), and those with rates above 4% are coded 2 (high).

^a Since 2000.

^b Germany now allows for dual citizenship at birth, but requires dual citizens to choose only one nationality between the ages of 16 and 23.

^c While Greece's residency requirement is five years, it does not give second-generation immigrants the right to naturalize. Moreover, Greece is one of only two EU countries (the other is Denmark) not to have a specific provision for naturalization by marriage (Weil 2001:24).

^d Since 2001.

Table A2: Detailed Citizenship Policy Index for the 15 EU Countries in the 1980s

Country	Citizenship by Birth (0 – 2)	Naturalization Requirements (0 – 2)	Acceptance of Dual Citizenship for Immigrants (0 – 2)	Naturalization Rate (0 – 2)	Total Score (0 – 8)
Austria	0	0	0	1	1
Belgium	2	2	2	1	7
Denmark	0	1	0	1	2
Finland	0	2	0	2	4
France	2	2	2	0	6
Germany	0	0	0	0	0
Greece	0	0 ^a	2	0	2
Ireland	2	2	2	0	6
Italy	0	0	0	0	0
Luxembourg	0	0	0	0	0
Netherlands	2	2	2	1	7
Portugal	2	0	2	0	4
Spain	0	0	0	1	1
Sweden	0	2	0	2	4
U.K.	2	2	2	1	7

Sources: See Table 1.

Note: See Table A1 for a full description of the coding procedure.

^a While Greece's residency requirement is five years, it does not give second-generation immigrants the right to naturalize. Moreover, Greece is one of only two EU countries (the other is Denmark) not to have a specific provision for naturalization by marriage (Weil 2001:24).

Table A3: Variation in Naturalization Requirements in the Countries of the EU

Country	Do Second-Generation Immigrants Have the Right to Naturalize?	Requirements for First-Generation Immigrants Who Apply for Naturalization						
		Residence (in years)	Knowledge of Language	Loyalty Oath	Sufficient Income	Good Character	Absence of Conviction	
Austria	no	10	yes	yes	yes		yes	
Belgium	yes	3						
Denmark	yes	7	yes		yes	yes	yes	
Finland	yes	5			yes	yes	yes	
France	yes	5	yes		yes	yes	yes	
Germany	yes	8	yes		yes			
Greece	no	5		yes			yes	
Ireland	yes	5		yes		yes		
Italy	yes	10						
Luxembourg	no	10	yes		yes		yes	
Netherlands	yes	5	yes					
Portugal	yes	10	yes		yes	yes		
Spain	yes	10						
Sweden	yes	5				yes	yes	
United Kingdom	yes	5	yes			yes	yes	

Sources: Hansen (1998:758-759) on second-generation immigrants' right to naturalize; Weil (2001:22-23) on residence and the other requirements for first-generation immigrants.

References

- Aleinikoff, T. Alexander. 2000. "Between Principles and Politics: U.S. Citizenship Policy." In *From Migrants to Citizens: Membership in a Changing World*, edited by T. Alexander Aleinikoff and Douglas Klusmeyer. Washington, DC: Carnegie Endowment for International Peace (119-172).
- Aleinikoff, T. Alexander, and Douglas Klusmeyer, eds. 2000. *From Migrants to Citizens: Membership in a Changing World*. Washington, DC: Carnegie Endowment for International Peace.
- Aleinikoff, T. Alexander, and Douglas Klusmeyer, eds. 2001. *Citizenship Today: Global Perspectives and Practices*. Washington, DC: Carnegie Endowment for International Peace.
- Aleinikoff, T. Alexander, and Douglas Klusmeyer. 2002. *Citizenship Policies for an Age of Migration*. Washington, DC: Carnegie Endowment for International Peace.
- Aristotle. 1941. *The Politics of Aristotle*. Edited and translated by Ernest Barker. London: Oxford University Press.
- Beiner, Ronald, ed. 1995. *Theorizing Citizenship*. Albany: State University of New York Press.
- Benhabib, Seyla. 2001. *Transformations of Citizenship: Dilemmas of the Nation-State in the Era of Globalization*. Amsterdam: Van Gorcum.
- Benhabib, Seyla. 2002a. "Political Theory and Political Membership in a Changing World." In *Political Science: State of the Discipline*, edited by Ira Katznelson and Helen V. Milner. New York: W.W. Norton & Company (404-432).
- Benhabib, Seyla. 2002b. "Transformations of Citizenship: The Case of Contemporary Europe." *Government and Opposition* 37 (4):439-465.
- Brubaker, Rogers. 1992. *Citizenship and Nationhood in France and Germany*. Cambridge, MA: Harvard University Press.
- Carens, Joseph. 1995. "Aliens and Citizens: The Case for Open Borders." In *Theorizing Citizenship*, edited by Ronald Beiner. Albany: State University of New York Press (229-255).
- Castles, Stephen, and Alastair Davidson. 2000. *Citizenship and Migration: Globalization and the Politics of Belonging*. New York: Routledge.
- Cinar, Dilek. 1994. "From Aliens to Citizens: A Comparative Analysis of Rules of Transition." In *From Aliens to Citizens: Redefining the Status of Immigrants in Europe*, edited by Rainer Bauböck. Aldershot, U.K.: Avebury (49-72).
- European Commission. 2002. "Proposal for a Joint Report by the Commission and the Council on Adequate and Sustainable Pensions."
- Feldblum, Miriam. 1999. *Reconstructing Citizenship: The Politics of Nationality Reform and Immigration in Contemporary France*. Albany: SUNY Press.
- Feldblum, Miriam. 2000. "Managing Membership: New Trends in Citizenship and Nationality Policy." In *From Migrants to Citizens: Membership in a Changing World*, edited by T. Alexander Aleinikoff and Douglas Klusmeyer. Washington, DC: Carnegie Endowment for International Peace (475-499).
- Fetzer, Joel S. 2000. *Public Attitudes toward Immigration in the United States, France, and Germany*. Cambridge: Cambridge University Press.

- Freeman, Gary P. 1995. "Modes of Immigration Politics in Liberal Democratic States." *International Migration Review* 29 (4):881-913.
- Hanagan, Michael, and Charles Tilly, eds. 1999. *Extending Citizenship, Reconfiguring States*. Lanham, MD: Rowman & Littlefield Publishers.
- Hansen, Randall. 1998. "A European Citizenship or a Europe of Citizens? Third Country Nationals in the EU." *Journal of Ethnic and Migration Studies* 24 (4):751-768.
- Hansen, Randall. 2002. "Globalization, Embedded Realism, and Path Dependence: The Other Immigrants to Europe." *Comparative Political Studies* 35 (3):259-283.
- Hansen, Randall, and Patrick Weil, eds. 2001. *Towards a European Nationality: Citizenship, Immigration, and Nationality Law in the EU*. New York: Palgrave.
- Hansen, Randall, and Patrick Weil, eds. 2002. *Dual Nationality, Social Rights, and Federal Citizenship in the US and Europe: The Reinvention of Citizenship*. New York: Berghahn Books.
- Howard, Marc Morjé. 2002. "One Person, Two Votes? Tolerance of Dual Citizenship in the Countries of the EU." Paper presented at the American Political Science Association, in Boston.
- Jacobson, David. 1996. *Rights across Borders: Immigration and the Decline of Citizenship*. Baltimore: Johns Hopkins University Press.
- Joppke, Christian. 1998. "Why Liberal States Accept Unwanted Immigration." *World Politics* 50 (2):266-293.
- Joppke, Christian. 1999. *Immigration and the Nation-State: The United States, Germany, and Great Britain*. Oxford: Oxford University Press.
- Katznelson, Ira. 1997. "Structure and Configuration in Comparative Politics." In *Comparative Politics: Rationality, Culture, and Structure*, edited by Mark I. Lichbach and Alan S. Zuckerman. Cambridge: Cambridge University Press (81-112).
- Koslowski, Rey. 2000. *Migrants and Citizens: Demographic Change in the European State System*. Ithaca: Cornell University Press.
- Kymlicka, Will, and Wayne Norman, eds. 2000. *Citizenship in Diverse Societies*. Oxford: Oxford University Press.
- Marshall, T.H. 1950. *Citizenship and Social Class*. London: Cambridge University Press.
- Miller, David. 2000. *Citizenship and National Identity*. Cambridge, U.K.: Polity Press.
- Nascimbene, Bruno, ed. 1996. *Nationality Laws in the European Union*. Milan, Italy: Giuffrè Editore.
- Rubio-Marín, Ruth. 2000. *Immigration as a Democratic Challenge: Citizenship and Inclusion in Germany and the United States*. Cambridge: Cambridge University Press.
- Salt, John, James Clarke, and Sandra Schmidt. 2000. "Patterns and Trends in International Migration in Western Europe." Luxembourg: Office for Official Publications of the European Communities.
- Sassen, Saskia. 1996. *Losing Control? Sovereignty in an Age of Globalization*. New York: Columbia University Press.
- Sassen, Saskia. 1998. "The de facto Transnationalizing of Immigration Policy." In *Challenge to the Nation-State*, edited by Christian Joppke. Oxford: Oxford University Press (49-85).
- Soysal, Yasemin Nuhoglu. 1994. *Limits of Citizenship: Migrants and Postnational Membership in Europe*. Chicago: University of Chicago Press.

- Spiro, Peter J. 2002. "Embracing Dual Nationality." In *Dual Nationality, Social Rights, and Federal Citizenship in the US and Europe: The Reinvention of Citizenship*, edited by Randall Hansen and Patrick Weil. New York: Berghahn Books (19-33).
- Steinmo, Sven, Kathleen Thelen, and Frank Longstreth, eds. 1992. *Structuring Politics: Historical Institutionalism in Comparative Analysis*. Cambridge: Cambridge University Press.
- Torpey, John. 2000. *The Invention of the Passport: Surveillance, Citizenship and the State*. Cambridge: Cambridge University Press.
- Weil, Patrick. 2001. "Access to Citizenship: A Comparison of Twenty-Five Nationality Laws." In *Citizenship Today: Global Perspectives and Practices*, edited by T. Alexander Aleinikoff and Douglas Klusmeyer. Washington, DC: Carnegie Endowment for International Peace (17-35).
- Zappalà, Gianni, and Stephen Castles. 2000. "Citizenship and Immigration in Australia." In *From Migrants to Citizens: Membership in a Changing World*, edited by T. Alexander Aleinikoff and Douglas Klusmeyer. Washington, DC: Carnegie Endowment for International Peace (32-81).