

**"A EUROPEAN DILEMMA":  
THE MYTH AND REALITY OF CITIZENSHIP IN NORTHWESTERN EUROPE**

**Victor Gray  
University of Maryland**

**"A EUROPEAN DILEMMA":  
THE MYTH AND REALITY OF CITIZENSHIP IN NORTHWESTERN EUROPE**

Victor Gray

**INTRODUCTION**

The purpose of this essay is to examine the changing nature of citizenship in Northwestern Europe, specifically in Britain, France, and Germany, the three most important countries in the area; the causes and consequences of the changes; and the degree to which the changed reality corresponds to theory about citizenship in liberal democratic welfare states. It is a study of a Europe that, since World War II, has gone from homogeneity to heterogeneity - without planning or preparation; i.e., without adequate or even coherent policies with regard to immigration and naturalization. It posits two hypotheses, one growing out of this absence of a coherent, consistent policy and the other out of the increasing tenuousness of the traditional nation-state. First, essentially open borders and lack of clear-cut, equally open naturalization procedures have resulted in a large, permanently resident "foreign" population consisting of people who are not full-fledged members of the states and societies in which they find themselves. In the absence of action by the host governments, the risk arises that they may become permanently "foreign," creating, in turn, still further confusion about the role of the nation-state and the meaning, value of citizenship therein. The second hypothesis is that the strongest determinant of such governmental action is not self interest defined in economic terms but rather the degree of identity security of host

country citizens measured in socio-cultural terms.

In seeking to understand these processes and why they have led to the concept of citizenship becoming so problematic, it is necessary to start with some key propositions that describe the scope of the discussion to follow. First, the "new" immigrants are overwhelmingly economic immigrants from non-European areas seeking work in the prosperous post-industrial societies of Northwestern Europe. Second, while the European host governments continue to insist that they are not immigration countries in the sense that Canada or the United States are, they invited disguised immigration from the early 1950s to the 1970s to meet an objective economic need for young laborers to rebuild war-damaged, labor-short economies, and, in the case of Britain, to maintain the myth of a single Commonwealth citizenship. In the 1980s and 1990s, these "temporary guestworkers" - and their families - and in-gathered colonial citizens have become permanently imbedded in the host countries to which they migrated and, on the whole, have contributed more to the economies of those countries than they have benefited from them. Indeed, their presence in the labor force has been an important factor in supporting welfare systems in states with rapidly greying populations. This is part of a global trend in the world political-economy in which not only capital but also labor has become highly mobile. The result, in nearly all highly industrialized countries, is a rough dichotomy between highly

paid, skilled citizens and a permanently resident but non-citizen population of low paid unskilled workers.<sup>1</sup>

But, central to the thesis of this study, immigration and citizenship in today's Europe is viewed by host country citizens not so much as an economic issue as a socio-cultural issue of identity. The reasons for this stress on identity are threefold. First, the "new" immigration is "differentiated," the majority being of color and a plurality Muslim. Integration is, thus, more problematic and assimilation probably unattainable in societies in which people tend to see race more as an either-or proposition than on a sliding scale continuum. Second, the pace and volume of immigration, particularly since the late 1980s, has created a sense among the peoples of the host countries that immigration is out of control and threatening to overwhelm them and their culture. To be fair, there are good grounds for such perceptions, especially in Germany, where a veritable "flood" - to use a loaded word current there - of refugees and asylum seekers have arrived since 1989. This has led to an overheated crisis atmosphere not only in Germany but also in France, where Frenchmen looking south to Algeria, anticipate their own flood. Third, there is a growing uneasiness that old models of the nation-state and citizenship are losing their salience. Together, these factors have produced an identity crisis that can be particularly troubling in a country like Germany, whose identity has always been problematic and which is simultaneously

undergoing the socio-economic trauma of unification and the strain of resettling hundreds of thousands of ethnic Germans from further east.

The problem is thus not primarily one of immigration *per se* but rather of identity insecurity on the part of host country citizens. Non-European newcomers will not find peace in their new homelands, until their European hosts are at peace with themselves about who and what they are. In the end, it is they who must decide what Germany or France is; who and by what means one may be called a German or Frenchman, or Briton; and, most importantly, what the normative quality of state and society will be. In reaching those decisions they must deal with the inherent tensions between the universalist inclusiveness of liberal democracy and the particularist exclusiveness of nationalism, between the politics of the state and the sociology of community. Will they choose to go "back to the future" of 19th century nationalism, as appears to be happening in Eastern Europe? Will they, together with the newcomers, seek to strike a new balance in moving forward to a new postnational paradigm of citizenship? Or will they discover that some old models - for example, the imperial citizenship of Austria-Hungary - might be relevant in an era when a new supranational citizenship is emerging?

The "immigrant problem" - i.e., the way in which non-European immigrants are treated in Europe as fully equal citizens

or as less privileged members of society - is, therefore, predominantly a white *European* problem. The parallels with Gunnar Myrdal's treatment half a century ago of the "Negro Problem" in the United States are inescapable. "The Negro problem," he said, "is predominantly a white man's problem....[that] is an integral part of, or a special phase of, the whole complex of problems in the larger American civilization. It cannot be treated in isolation."<sup>2</sup> Similarly, Europe's handling of its "immigrant problem" - after decades of postponement and non-policy - cannot be treated in isolation from European perceptions about themselves and their civilization. The solutions they achieve - if they do - will speak volumes about the nature of that civilization on the eve of a new millenium. One can only hope that they do better than Americans have in dealing with their problem.

#### **METHODOLOGY**

Examination of this "European Dilemma" must begin with a discussion of the myth of ideal citizenship that Europeans have clung to in the latter half of the 20th century. As the still dominant paradigm for citizenship in liberal democracies such as those in Northwestern Europe, T.H. Marshall's model of modern "social citizenship" has played this role of myth - the metanarrative on citizenship - for Europeans in much the same way that Myrdal argues the "American Dream" has done for Americans.

Attention will then be focused on the reality of the "European Dilemma," beginning with a brief discussion of the processes that have led to the heterogenization of the Northwest European states, to the additional pressure those processes have placed on traditional concepts of "nation-state" and "citizen," and to a statement of magnitude and nature of the "immigration problem" that Europeans face in this regard. With regard to the latter, attention will be focused on why this is perceived by Europeans as an identity rather than an economic problem.

The actual European response to-date to this "immigration problem" will be treated in a discussion of evolution of the political and administrative policies and practices of Britain, France, and Germany with regard to immigration and naturalization. These policies and practices relate to the immigrants' tasks of getting into the countries of Northwestern Europe and gaining access to political and civil rights in those countries and to the Europeans' tasks - until very recently ignored - of gaining control of their borders and regularizing the terms and procedures of citizenship.

Seeking, finally, to compare myth and reality, an attempt will be made to unite theory and practice in a discussion of what Europeans can do to extricate themselves from the cul-de-sac into which they have driven willy nilly.

## THE MYTH

The bind in which Europeans currently find themselves in terms of creating "national" identities that will encompass old natives and new immigrants stems from the rootedness in European thinking of concepts of "nation," "state," and "citizen," and, in particular, that modern European creation - the "nation-state." Clear thinking about the project is confounded by what Joseph Rothschild has called "flawed language, or, rather, the flawed use of language."<sup>3</sup> The very hyphen in "nation-state," he argues, is an "intellectual offense," a bad habit

...which begs the whole question, precisely when we are confronted by the implausibility of the assumption of synonymity. All too often "nation-state" is simply a lazy escape. When I was a student, I was taught, for example, that Czechoslovakia was the nation-state of the Csechoslovak nation. Now I am expected to teach my students that the Czech and Slovak republics are the distinct nation-states, respectively, of the Czech and Slovak nations. Why should I have more confidence in this second scenario than in the earlier one? Who can reassure me that fifty years from now the Czechs will not have divided into Bohemians and Moravians? This is only one of many possible examples to illustrate the point that "nation-state" is a precarious and weak term.<sup>4</sup>

It is not the purpose of this study to reexamine yet again the hoary derivations of such terminology - Rothschild does an excellent job of that in his essay - but rather to consider its continued relevance to the current situation in Western Europe. In this regard, it has been argued that the concepts of "nation-state" and "citizenship" may be developments the relevance of which may be limited geographically and chronologically; whose time may have come and gone. Bryan S. Turner, for example,



contends that "citizenship may not be a universal concept, because it developed out of a particular conjuncture of cultural and structural conditions which may be peculiar to the West;" i.e., the "development of urban civil society...which flourished with the growth of European trade."<sup>5</sup> And, as William Rogers Brubaker notes:

Massive postwar migrations have posed a fundamental challenge to the nation-states of Europe and North America. They have compelled these countries to reinterpret their traditions, to reshape their institutions, to rethink the meaning of citizenship - to reinvent themselves, in short, as nation-states.<sup>6</sup>

A. T.H. MARSHALL...

Central to the now lively discussion surrounding the relevance and/or need to reinvent conventional notions of nation-state and citizenship in Europe is the seminal work of T. H. Marshall, *Citizenship and Social Class* (1949), an expanded version of which was re-published in the United States in 1964 as *Class Citizenship and Social Development*.<sup>7</sup> It provides a conceptual framework for citizenship in modern liberal democratic welfare state such as those of Northwestern Europe and, as such, must be accepted as the starting point for *this* discussion.

Briefly put, Marshall's theory of citizenship sought to "reconcile the formal framework of political democracy with the social consequences of capitalism as an economic system, that is...to reconcile formal equality with the continuity of social class divisions."<sup>8</sup> His answer was the welfare state which would

"limit the negative impact of class differences on individual life chances, thereby enhancing the individual's commitment to the system."<sup>9</sup> In his analysis, he identifies three parts or elements of citizenship - legal, political, and social - and describes how legal or civil rights developed in the 17th century; political rights - i.e., participatory parliamentary democracy - in the 18th and 19th centuries; and social rights or entitlements in the 20th. Equality is central to his argument. But, despite his repeated reference to economic considerations, it is an equality that goes well beyond the putative economic leveling of the welfare state. That leveling, to the extent it actually occurs, is, on Marshall's account, a "relatively unimportant" means to an end. What is important is that there is

a general enrichment of the concrete substance of civilized life, a general reduction of risk and insecurity, an equalization between the more and less fortunate at all levels - between the healthy and the sick, the employed and the unemployed, the old and the active, the bachelor and the father of a large family. Equalization is not so much between classes as between individuals within a population which is now treated for this purpose as though it were one class. *Equality of status is more important than equality of income.*<sup>10</sup>

Such equality is important in creating a bond sufficient to replace the notion of "kinship or the fiction of common descent" in pre-modern nations "bound together by sentiment and recruited by a fiction."<sup>11</sup> "Citizenship," Marshall stresses, "requires a bond of a different kind, a direct sense of community membership based on a loyalty to a civilization which is a common possession. It is a loyalty of free men endowed with rights and

protected by a common law"<sup>12</sup> It is a common civilization that we gain possession of not by passive inheritance through birth but rather by the very active "struggle to win those rights and by their enjoyment when won."<sup>13</sup> But, Marshallian citizenship, also entails obligations that are again actively rather than passively created. In the modern welfare state, he says, "crude economic bargaining is converted into something more like a joint discussion of policy"<sup>14</sup> - something, to be sure, much closer to the *Mitbestimmung* ("Co-determination") of labor-management relations in Germany and other continental social democracies than anything ever achieved in Marshall's Britain. As he adds:

The implication is that decisions reached in this way must command respect. If citizenship is invoked in the defence of rights, the corresponding duties of citizenship cannot be ignored. These do not require a man to sacrifice his individual liberty or to submit without question to every demand made by the government. But they do require that his acts be inspired by a lively sense of responsibility towards the welfare of the community.<sup>15</sup>

Again, economic policy in the welfare state is a means to the end of constructing modern citizenship. And, crucial to this very active and mutual construction process is agency; not just agency *per se*, but *equal agency*. To the extent that freedom of expression and one person, one vote are high on any list of citizenship rights, agency in this sense requires, as Geraint Parry notes, not just non-interference with such freedoms but a certain enablement.<sup>16</sup> All citizens must be able to speak effectively to their fellow citizens on the decisions facing the polity. Noting further that "an equal vote implies equalising

the facilities which are used to influence the vote," Parry suggests that this could entail guaranteed equal access to television time or newspaper space.<sup>17</sup> For Marshall, equal agency in the exercise of rights translated to social rights which he juxtaposed to civil rights "which confer the legal capacity to strive for the things one would like to possess but do not guarantee the possession of any of them."<sup>18</sup> Social rights, however, have a different quality, which Marshall sought to convey in the following metaphor:

A property right is not a right to possess property, but a right to acquire it, if you can, and to protect it, if you can get it. But, if you use these arguments to explain to a pauper that his property rights are the same as those of a millionaire, he will probably accuse you of quibbling. Similarly, the right to freedom of speech has little real substance if, from lack of education, you have nothing to say that is worth saying, and no means of making yourself heard if you say it. But these blatant inequalities are not due to defects in civil rights, but to a lack of social rights....<sup>19</sup>

It is worth noting how, in this passage, Marshall conflates the *right* to equal access to the facilities of influence with the *obligation* to say something "worthwhile" to your fellows. Throughout his essay, he stresses the importance of education to both. Paradoxically, however, education, in "sift[ing] human material during the early years of life," not only destroys hereditary privilege, creates equality of opportunity, and promotes mobility, but, in the end, creates a "structure of unequal status fairly apportioned to unequal abilities."<sup>20</sup> On Marshall's account, there is no need to deplore this result,

since "the status acquired by education is carried out into the world bearing the stamp of legitimacy, because it has been conferred by an institution designed to give the citizen his just rights."<sup>21</sup> There is, however, a need to be aware of its consequences as an "instrument of social stratification" - consequences which, he argues, "can be attacked and kept within bounds by giving as much opportunity as possible for second thoughts about classification, both on the educational system itself and in after-life."<sup>22</sup> He has in mind, particularly, the classifying process in education by which "differences within each class are ignored as irrelevant...[and] differences between classes are given exaggerated significance." "Thus," he argues, "qualities which are in reality strung out along a continuous scale are made to create a hierarchy of groups...."<sup>23</sup> If such tendencies are kept in check, the equalizing, empowering effects of education *cum* redistribution will ensure individual commitment to a system in which *all* are *full* members of the community possessing in equal measure the rights and duties of membership. This is the "social citizenship," an evolutionary work-in-progress, that T.H. Marshall held up as an ideal to strive for.

#### B. ...AND HIS CRITICS

Ideal or not, Marshall's theory of citizenship has been attacked from right, left, and center but still occupies the intellectual high ground against which to judge alternative models. As one centrist critic, Eleonore Kofman, puts it:

...it still provides us with a benchmark from which we could evaluate the degree to which rights have been diminished and to which we should seek to return; and it also allows us to assess how public and private domains are linked and might be transcended, and how non-class and non-work social movements have made claims on the state in terms of citizenship.<sup>24</sup>

As Kofman notes, however, Marshall has been criticized, *inter alia*, "for being too optimistic in the face of a massive erosion of social rights, for overlooking the dynamic arising from the processes of globalization and geopolitics, [and] for the lack of a comparative perspective...."<sup>25</sup> Others such as Michael Mann have honed in on Marshall's Anglocentric analysis and his neglect of geopolitical factors, limitations that tend to "obscure the contingent and power-dependent elements in the constitution of modern citizenship: less a secure status than a sphere of continuous struggle."<sup>26</sup> For their part, Ursula Vogel and Michael Moran cite two concerns of particular relevance for this study; namely, Marshall's emphasis on: 1) class and class divisions; and 2) location of citizenship entirely within the geographical and cultural boundaries of the nation-state. The first of these emphases, according to Vogel and Moran, tends to "conceal or marginalize the continued existence of other divides...."<sup>27</sup> (They stress gender [Cf. Kofman, 1995]; this study stresses ethnicity, race and religion.) The second tends to underplay the problematic linkage between the centrifugal pressures on the nation-state, the "once unquestioned terrain of membership," and the "internal fragmentation in the structure of multi-ethnic societies."<sup>28</sup> In this regard, Jytte Klausen,

another critic of Marshall whose main argument with him rests on other grounds (See below), notes that:

Borders are changeable, as are the definitions and standards for citizenship. Wars, migrations, and annexations are important causes of change. E.J. Hobsbawm (born 1917) has estimated that a person of his age living in certain areas of Eastern Europe may have changed citizenship four or five times without ever having moved.<sup>29</sup>

To be sure, there is no reason to that expect Marshall, writing from the perspective of 1949 or even, 1964, could have anticipated the revolutionary developments of the past decade. Nor is there any reason to conclude that such developments necessarily invalidate his theory, at least as far it takes us. They do, however, require us to consider alternatives, or, giving due weight to Marshall's claim that he was describing an evolutionary process, simply to take him beyond where he left us in the mid-1960s.

There is, however, one critique of Marshall - one generally from the right - that, if accepted, guts his theory and forces one to consider that we cannot take him anywhere but into a cul-de-sac. It attacks frontally the concept of social rights and, thereby, Marshall's entire evolutionary scheme culminating in redistribution as the egalitarian glue of modern citizenship. It has been put most baldly by Klausen who argues - from the left - against the "mistake" of using Marshall's work "to justify a ...redefinition [of citizenship] that extends the logic of redistributive social rights to redistributive civil and

political rights."<sup>30</sup> On her account:

Redistributive social rights are not fundamental rights equivalent to political and civil rights. They are a matter of social policy; subject to political compromise and bargaining, they require the democratic consent of the community. Marshall's essay and the later accounts that rely on his definition of redistributive policies as matters of social citizenship have left a trail of mislabeling in the literature on the welfare state.<sup>31</sup>

As the recent literature on *citizenship* suggests, this reconsideration of Marshallian social citizenship has become a burgeoning cottage industry among social scientists of all sorts. The most objective and, therefore, useful of this reconsideration has been at the hands of Bryan S. Turner, Barry Hindness, J.M. Barbalet, Ralf Dahrendorf, Jurgen Habermas, and Nancy Fraser and Linda Gordon.<sup>32</sup> In the hands, however, of politicians and policy-oriented academics, particularly on the right, this reconsideration has taken the form of a more partisan agenda, especially in Great Britain and the United States. Joining the fray from the left, Michael Ignatieff claims that:

The conservative counter-revolution has re-written the history of citizenship in order to drive home a very different message. Largely under the influence of Hayek and Popper, post-war European conservatism viewed the history of collectivism as a conspiracy against liberty....[and] the political counter-revolution that brought Margaret Thatcher to power in England and Ronald Reagan to power in the United States can best be understood as an attack on the citizenship of equal entitlement in post-war liberal democratic society.<sup>33</sup>

Admitting, however, that the Marshallian idea of citizenship is "in trouble," because "practical experience did not always



validate the post-war civic ideal that public goods would extend civic solidarity,"<sup>34</sup> Ignatieff says that the leftist rebuttal will have first to address the "ambiguous impact of the post-war welfare state on social solidarity."<sup>35</sup> It will, he argues, have to resist the temptation to wrap its position in the rhetoric of altruistic caring. As he puts it:

The language of citizenship is not properly about compassion at all, since compassion is a private virtue which cannot be legislated or enforced. The practice of citizenship is about ensuring everybody the entitlements necessary to the exercise of their liberty. As a political question, welfare is about rights, not caring, and the history of citizenship has been the struggle to make freedom real, not to tie us all in the leading strings of therapeutic good intentions.<sup>36</sup>

Perhaps, however, this *political* debate about the relationship between rights and entitlements is peculiar to Great Britain and the United States. In continental Europe the ascendancy of conservative government has not been matched by attempts to institute poll taxes, technically "community charges" that reverse an old saw in stipulating "no representation without taxation," nor to enact "workfare" schemes that link welfare rights to a readiness to work. There, social citizenship - at least for native Europeans - remains alive and well. Differentiations and inequalities in membership do not arise so much on grounds of socio-economic status but rather on identity issues stemming from immigration and little affected by the politics of entitlements. Klausen claims, for example, that, on the one hand, the recent surge in immigration has led to tighter

distinctions between citizens and non-citizens with regard to rights and entitlements, and, on the other, that "increasing the levels of a state's obligation to immigrants will only deter their accomodation" by making it harder for them to find work.<sup>37</sup> She argues, therefore, that, if they are to make citizenship less exclusionary and to come to accomodative terms with the realities of immigration, Europeans will have to move beyond the debate surrounding Marshall's emphasis on the welfare state. On her account, this means moving beyond the state-centered conceptualization of citizenship to a globalized or at least Europeanized concept of nested citizenship with "add-on" rights. Her vision of the post-Maastricht European Union is one in which states will coexist with the supranational EU, exclusion from national citizenship will be tempered by minimum EU rights, and

...not all people will have the same rights and states will not be universally obligated to produce equality out of difference. Nor will social, political, and civil rights be linked, as in Marshall's trinity. But advantage and exclusion will be mitigated by making some protective rights available to everbody.<sup>38</sup>

This leaves unanswered, of course, the precise nature of the glue - the source of solidarity - that is to hold the vestigial states together. What, one must ask, is to be the nature of a citizenship that is, by definition, partial or incomplete? Klausen's, however, is but one vision of an alternative future for citizenship in Europe. One does not have to accept her vision in agreeing with her that we may have to move beyond models such as Marshall's to consideration of alternatives that

may or may not be more appropriate to the reality of Europe's current condition.

## THE REALITY

### A. THE UNINTENDED CREATION OF AN "IMMIGRATION PROBLEM"

The first question to be asked here is: "How big is the problem?" The short answer is "Very big!" Since World War II, the demographic face of Northwestern Europe has been changed dramatically by large-scale labor migration from the Mediterranean area; by an in-gathering of colonial peoples from collapsed empires; and, particularly since 1989 and particularly in the case of Germany, by more than 2 million asylum seekers from Eastern Europe. Clinging, however, to the myth that theirs were not traditional immigration countries but rather emigration countries, the British, French and German governments have sought to mask the fact of this immigration in euphemisms. Concomitantly, they have sought also to avoid the tough political decisions that would follow from a clear admission that theirs are, indeed, immigration countries. Thus, they have maintained until quite recently that the more than 6 million foreign laborers within their borders and millions of their dependents were *temporary* "guestworkers" who would some day return to their homelands. So, too, they insist, will the asylum seekers - despite the fact that, with the exception of the legitimate refugees from the war in former Yugoslavia, most of these people are "economic refugees" seeking a better life in the

West. The result is that there are about 16 million more or less permanently resident "foreigners" within the borders of the states of Northwestern Europe who do not possess the citizenship of those states. In addition, many of the former colonial peoples resident in those states possess only partial or otherwise defective citizenship. The proliferation of multiple categories of citizenship was particularly pronounced in Britain, where the inter-connection of immigration and citizenship law played a greater role than it did in either France or Germany. Given the tightness of that nexus in Britain, discussion of the process by which its "immigrant problem" will be subsumed in the treatment in the second half of this section of its policies and practices with regard to citizenship. Therefore, what follows immediately will center on the growth of immigration to France and Germany.

Labor migration is central to the process and accounts for the bulk of legally resident "foreigners" in Northwestern Europe today. This migration began in the mid-1950s, when post-war economic reconstruction fueled by the Marshall Plan took on the proportion of an economic boom. When it soon became clear, particularly in France and Germany, that indigenous labor pools, which had been sharply depleted by the casualties of the war, would be insufficient to sustain the boom, the countries of the area signed a series of bilateral labor agreements with the poorer countries to their south - Italy, Greece, Portugal and

Spain - whereby temporary laborers would be admitted for work in particular sectors of the economy (e.g., agriculture, construction, and mining). This was supplemented in the case of France by migration from North Africa, principally of Algerians who, until 1962, could opt for French citizenship. Indeed, as one observer notes, Algerian labor migration to France "dated back to the First World War, when Algerians were recruited to work in French munitions factories, mines and armed services, and by 1962 [such] migration had become 'a massive, structural, permanent feature' of both the Algerian and French economies."<sup>39</sup> Upon Algeria's gaining of independence in 1962, one of the first acts of the two governments was the signing of a bilateral agreement formalizing the flow of such labor.

By the early 1960s, the demand for foreign labor, even in more skilled areas as steel and automobile manufacturing, reached such proportions that the countries of Northwestern Europe turned to other suppliers on the eastern and southern rim of the Mediterranean, notably Morocco, Tunisia, and especially Turkey. The latter signed bilateral labor agreements with Germany in 1961; Austria, Belgium, and the Netherlands in 1964; France in 1965; and Sweden in 1967. The agreement with France was typical. In addition to providing French social welfare benefits such as health care and pension payments to the Turkish workers, it stipulated fairly precise provisions intended to match supply with demand; to wit:

The French government will periodically inform the Turkish government about any of its manpower needs that would be suitable for Turkish workers. This information will, in particular, provide exact details of requirements regarding age, specializations, professional aptitudes and health. The Turkish government will provide the French government with as precise details as possible on the number, age and qualifications of Turkish workers desirous of working in France.<sup>40</sup>

As a result of these agreements there were already close to one million Turkish workers living in Northwestern Europe by 1974.

In the wake of the "Oil Shock" of 1973, the governments of France and Germany called a sudden halt to foreign labor recruitment and, indeed, sought to entice many to return home with, for example, brandishments of substantial one-time payments for doing so. While 1973 represented a peak in the number of foreign workers in these countries, economic immigration has, in reality, continued apace. The case of Germany is instructive in this regard. There the data for legal foreign workers alone bears out such trends. In Germany, however, the percentage of illegals, the *Schwarzarbeiter* or "black workers," in the overall labor force is probably as high as in the United States.<sup>41</sup> Moreover, the number of "foreigners" in Germany -- now about 7 million -- has continued to increase through the legal immigration of the dependent family members of workers and about 100,000 births a year. Indeed, one knowledgeable observer, Anthony Messina, has claimed that the 1973 and later "efforts to end the migration of labor stimulated a larger wave of secondary

migration, a wave predominantly made up of the dependents and the extended family of the original foreign workers."<sup>42</sup> Aiding in this process was passage in March of 1974 of the Law of Family Reunification which established a framework for allowing family members to join their working spouses. "Thus," Messina adds, "what began as a temporary economically motivated policy of labor recruitment became, by the late 1970s, a pattern of *significant and permanent settlement*."<sup>43</sup>

Thus, even steps designed to reverse the flow of labor migration may have had the unintended consequence of increasing the absolute size of the overall foreign population.<sup>44</sup> Moreover, the families of migrant workers having been reunited throughout Northwestern Europe, their differentially higher birth rates are leading to an increase in the percentage of foreigners in the countries of the area. This has led to feeling on the part of Europeans that there is little they can do to stem the flow, much less reverse it. Adding markedly to this sense that matters have "gotten out of control," is the rapid increase in the number of asylum applications since the mid-1980s. This has been a problem that has been particularly acute in Germany, which again finds itself a frontline state, this time in terms of intake of war refugees from former Yugoslavia and economic refugees from Eastern Europe.<sup>45</sup> It has, as a result, taken in more asylum seekers/refugees than the rest of the European Union combined. No wonder there is a sense in Germany that the country

is being "swamped" by a "flood." As noted above, when viewed in the context of reunification, the resettlement of hundreds of thousands of ethnic German from Eastern Europe and the former Soviet Union, and the already tenuous nature of German identity, it is no wonder either that the impact of this feeling of helplessness, felt everywhere in Northwestern Europe, contributes most markedly to an identity crisis in Germany.

Also as noted above, there are two other factors at work that have heightened the perceived threat to identity in this immigration crisis. The first is the increasingly differentiated nature of the "new immigration" in terms of race and religion. France may have succeeded in reducing slightly the overall number of resident foreigners but the number of Africans (Sub-Saharan and North African) and Asians continues to increase dramatically, with nearly all of France's asylum seekers coming from Africa and Asia. Moreover, should the situation in Algeria deteriorate further, France can expect to face even more refugees than Germany has in the past few years. It is also worth noting that, with the exception of Austria which, even more than Germany, is a frontline state for refugees from the former Yugoslavia, the majority of asylum seekers in every country, including Germany, are from Africa and Asia.<sup>46</sup>

There is, as a result, a large element of "differentness" that cannot, at least easily, be changed by the newcomers. First



and foremost, Turks in Germany, Africans in France and Belgium, Tamils in Sweden, Surinamese and Molluccans in the Netherlands, and West Indians and South Asians in the United Kingdom cannot change the color of their skin.<sup>47</sup> Nor is it easy for most of these people to change their religions. With regard to religion, the new Muslims of Europe face the hardest road. As in the United States, there is a growing perception that Islam - read *fundamentalist Islam* - is a palpable "threat" to the West. It is a fear that is spread by ostensibly reputable scholars such as Samuel Huntington who conjure up visions of cataclysmic clashes of culture. And it is a fear that is spread by ostensibly reputable politicians who warn of terrorist fifth columns in the bodies politic. As one Italian academic contends, the memories of Tours and Vienna are fresh to many Europeans who see in the immigration of Turks, North Africans, and now Bosnians another invasion by the "new Saracens."<sup>48</sup> The problem with such romantic notions is that the Turks and Bosnians in Germany - as opposed to the Algerians in France - are among the most secular of Muslims. This has not, however, prevented the mainstream media - and politicians - from propagating such ideas.

To sum up, the lateral pressures on the traditional nation-state created by immigration - the size and rapidity of post-war immigration and the "differentness" or "otherness" of the "new immigrants" - when taken together with the pressures from the EU above and the regions below, have disoriented Europeans, casting

into doubt old certainties about identity. This has contributed to a perception in Northwest Europe that "societal security" is being threatened.<sup>49</sup> It is a perception that derives in large part from the increasing gap between the fact of heterogeneization and the ideal model of the nation-state as a way of thinking about political and social membership. That ideal, William Rogers Brubaker claims, is

...a deeply influential model of membership that informs much current debate on immigration and citizenship. Membership, according to this model, should be egalitarian, sacred, national, democratic, unique, and socially consequential. The membership status of postwar immigrants to Europe and North America, however, deviates from this model in every respect. This has strained deeply rooted shared understandings about the way social and political understanding ought to be organized, and it has occasioned talk of a 'crisis of the nation-state'.<sup>50</sup>

In Northwestern Europe, the unwillingness of politicians to face up to these new realities has led to an increasing divergence between the theory of citizenship and the practice of immigration and naturalization in the several countries of the area.

#### **B. LESS-THAN-IDEAL POLICIES AND PRACTICES**

The haphazard nature of the policies and practices that Britain, France, and Germany have sought to apply to their "immigration problem" are typical of the denial practiced by other countries of Northwestern Europe - a denial that has postponed solution of the problems of immigration and that has created new uncertainties with regard to the nature and value of

citizenship. In turning to a discussion of those less-than-ideal policies and practices, it is important to keep a number of general distinctions in mind. First, the focus in this section will not be on how states *should* regulate access to citizenship but rather on how they actually *do* regulate such access. Second, it should be recognized that gaining such access is not a single or simple act. Rather, it is a usually lengthy process of passing through what Zig Layton-Henry has described as a series of gates. He describes three such gates: 1) admission at the border; 2) acquisition of permanent resident status; and 3) achievement of full citizenship through naturalization.<sup>51</sup> To these, one might add a fourth gate; i.e., admission to "social citizenship," Marshall's final "crowning stage" of citizenship. Such citizenship entails not just entitlements in terms of social welfare but recognition of one's dignity and equality as an integrated member of a community of solidarity. This remains a problematic concept that, as Zig Layton-Henry argues, has been central to post-war British immigration policy. It is much less so on the Continent where newcomers often achieve reasonably full access to social entitlements long before acquiring full civil citizenship. On the Continent, however, recognition as an integrated member of a community of solidarity may never come, leaving even third-generation offspring of immigrants isolated in "otherness" under the sobriquet of "foreigner."<sup>52</sup> One must question how "*full*" full civil citizenship is under such circumstances.

A third, final, and helpful distinction to be kept in mind as we work our way through a comparative analysis based on a "most similar systems" approach to the countries of Northwest Europe - countries that are very much alike in the liberality of their democracy, their social welfare systems, and their common post-war experience with immigration - is that the very dissimilar histories of those countries have produced different policies and practices with regard to citizenship. Those policies and practices tend to fall into three broad patterns based on the degree to which the countries concerned rely on descent (The Law of the Blood or *Jus Sanguinis*) or territory (The Law of Place or *Jus Soli*) to define citizenship. In a study that includes the United States and Canada, Brubaker summarizes the three patterns as follows:

In the United States and Canada, classical countries of immigration, citizenship has been defined expansively. Immigrants have been encouraged to naturalize, and citizenship is conferred automatically on all persons born in the territory (*jus soli*).

In West Germany and Sweden, traditional countries of emigration confronted only recently with significant immigration, citizenship is based on descent (*jus sanguinis*). Immigrants can accede to citizenship only through naturalization - easily in Sweden, with considerable difficulty in Germany.

In France, and to an even greater extent in Britain, postwar immigration is a legacy of colonialism. Citizenship laws, reflecting this legacy, are vastly more complex than those of the other countries. Some immigrants to Britain and France have possessed full citizenship on arrival; others have become citizens through the workings of *jus soli*; still others (especially in France) have been naturalized or (especially in Britain) have acquired citizenship through simple registration or declaration.<sup>53</sup>

And it is these naturalization procedures that lie at the center of Northwest Europe's immigration-citizenship problematic. Simply put, the first two of Layton-Henry's gates - immigration and permanent residence - have, until quite recently, been wide open, while the third - naturalization - has been zealously guarded, especially in *Jus Sanguinis* countries like Germany, but increasingly also in France and Britain. The data for 1984, which show extremely low naturalization rates for the countries of Northwestern Europe ranging from 0.92% to 5.59%, rates which have remained essentially unchanged over the ensuing decade. It has, moreover, proven to be an increasingly narrow gate for those whose "differentness" is pronounced. Again, the reasons relate more to perceptions of identity rather to rational choice considerations. This comes across quite clearly, when one looks more closely at the specifics of the experiences of Britain, Germany, and France. Britain, which has practiced a mixture of descent and territory with regard to citizenship and which originally had a wide open door to immigration, has now closed the immigration gate rather tightly. Germany, which relies almost exclusively on the principle of ethnically-defined citizenship, has paradoxically done little, save some tightening of its still very liberal asylum laws, to close its immigration gate. France is perhaps the most interesting case. Having always prided themselves on the "*egalite, fraternite,*" and inclusiveness of their concept of "*citoyen,*" Frenchmen find themselves in a struggle for the soul of their country, as they

have discovered their "*seuil de tolerance*" in the face of large scale immigration. And, in their response to immigration, they find themselves somewhere in between the do-nothing Germans and the "slam-the-door" British. Meanwhile, in all three countries as, indeed, throughout Northwestern Europe, racism festers against an increasing population of "foreigners" who find themselves "in" but not yet fully "of" the states the area.

**BRITAIN.** Britain has traditionally been an emigration country. In every decade between 1871 and 1930, the country experienced a sizeable net migration loss totalling several hundred thousand annually. During the decade 1931-1940, however, there was a 650,000 gain. Similar such gains were recorded during during and immediately after the war, as many colonial laborers, recruited for the war effort, stayed on.<sup>54</sup> As on the Continent, a post-war labor shortage caused the British government to keep its intra-Empire immigration gate open wide, a policy explicitly reaffirmed in the 1948 Nationality Act. Despite a royal commission recommendation that same year against large scale "colored" immigration, a "largely spontaneous" movement of workers from the "New Commonwealth" - i.e., the West Indies and South Asia - had already begun.<sup>55</sup> This reached major proportions in 1961-62, leading to the first effort to restrict immigration, the 1962 Commonwealth Immigrants Act, which introduced a quota system of sorts through a system of labor vouchers, according to which preference was given to those with a

specific job offer (A vouchers) or needed skills (B vouchers) and all others lumped into a third first-come, first-served category (C vouchers). Between 1962 and 1965, however, vouchers were issued liberally and New Commonwealth immigration continued at earlier levels.

Rising racial tensions and the importance of the immigration issue in the 1964 election led to a further tightening effort by the new Labor government. In 1965, the government restricted category A and B vouchers to 8,500 *en toto* and completely abolished category C for which there was a 400,000 waiting list. Following Kenya's "Kenyantisation" policy and the arrival of new tens of thousands of East African Asians, a new upsurge in anti-immigrant sentiment whipped up by far rightists such as Enoch Powell led to still tighter controls in the Commonwealth Immigration Act of 1968. This law required all citizens of the Commonwealth with no substantial connection by birth or descent to the United Kingdom to obtain an entry voucher before arriving. According to Layton-Henry:

It was the first time a distinction was made between patrial and non-patrial citizens of the United Kingdom, and the clear intention of the distinction was to control 'colored' immigration from the Commonwealth while allowing white Commonwealth citizens of British descent unrestricted access.<sup>56</sup>

Vouchers for East Africans were immediately limited to 1,500, rising to 5,000 by 1975.

This hodge-podge of regulations was replaced by the Immigration Act of 1971 which currently controls immigration and the "right of abode." It recognizes an unrestricted "right of abode" for patrials but requires visas for all others, "patrials" being defined as follows:

1. Citizens of the United Kingdom and Colonies who have citizenship by birth, adoption, registration, or naturalization in the United Kingdom or that have a parent or grandparent who was born in the United Kingdom or has acquired citizenship by adoption, registration, or naturalization.
2. Citizens of the United Kingdom and Colonies who have come from overseas, have been accepted for permanent residence, and have resided in the UK for five years.
3. Commonwealth citizens who have a parent born in the United Kingdom.
4. Women who are Commonwealth citizens (including citizens of the United Kingdom and Colonies) and are or have been married to a man in any of these categories.

The result of this legislation and subsequent tightening of visa controls on non-patrials has been a marked decrease in New Commonwealth immigration from 68,500 in 1972 to 22,500 in 1986. Figure 11 illustrates the parallel decline in New Commonwealth immigration as a percentage of total immigration.

The first two gates having closed considerably, HMG concentrated on the third gate in the British Nationality Act of 1981 which established three categories of citizenship: 1) British citizenship; 2) citizenship of the British Dependent Territories; and 3) British Overseas citizenship. Under the Act,



privileged British citizenship will as a general rule henceforth be transmitted only to the first generation born abroad. Those in category 2 do not have the right to enter and settle in the United Kingdom, and those in category 3 cannot pass their citizenship on to their children and do not themselves have the right to settle in any British territory.

Thus, in slightly more than three decades, the once wide open door of Commonwealth immigration has been closed reasonably tightly by a series of measures undertaken in reaction to racial tensions and rioting. It is immigration policy as race relations; i.e., a policy designed to "reassure people in Britain that their culture and identity was not being 'swamped' by large numbers of non-European immigrants" would, it was thought, convince them to be less hostile to immigrants.<sup>57</sup> The problem with such logic was pointed out Bernard Levin, a Labor MP, who declared in 1978 that:

You cannot by promising to remove the cause of fear and resentment fail to increase both. If you talk and behave as though black men were some kind of virus that must be kept out of the body politic, then it is the shabbiest hypocrisy to preach racial harmony at the same time.<sup>58</sup>

The result of this sort of immigration policy combined with the absence of a real push to ensure integration and equal opportunity is a Babel of citizenship statuses and an unintegrated and alienated non-European population. "The major problem facing future British governments," according to Layton-

Henry, "will be to ensure that second and third generations of black Britons are not alienated from their country of birth but feel full and equal citizens."<sup>59</sup>

**GERMANY.** This and future German governments, even more than the British, face precisely the same task. The root of the Germans' problem, however, arises out of a combination of an unchanging and clear cut citizenship law and a continuing lack of an immigration policy of any sort.

German citizenship law rests solely and solidly on the concept of *Jus Sanguinis*, which, in practice, operates in tandem with very restrictive naturalization procedures. One must ask, therefore, whether *Jus Sanguinis*, combined with liberalized naturalization procedures, will be sufficient for the integration task facing Germany? Under a January 1991 easing of naturalization regulations, "foreigners" between the ages of 16 and 23 will be naturalized, "as a rule," if they have:

- Legally resided in Germany for 8 years,
- Attended German schools for 6 years,
- Renounced or lost their previous citizenship, and
- Have not been convicted of a major felony.

Those who have legally resided in Germany for 15 years will be naturalized, "as a rule," if they:

- Renounce or lose their previous citizenship,
- Have not been convicted of a major felony, and
- Are able to support themselves and their family. (This condition is waived, if the individual becomes dependent on public assistance for reasons he or she is not responsible.)<sup>60</sup>

There are two "kickers" in these seemingly generous formulations. The first is the "as a rule" modifier, which has proven problematic in the implementation. The government and opposition Social Democrats, however, have recently agreed to seek a change in this regard stipulating an unrestricted right to naturalization, if the conditions therefor are fulfilled. More troubling in practice has the condition requiring the applicant to renounce his or her previous citizenship. This has proven especially difficult for Turks, since they, by and large, want to maintain ties to the old homeland and find that neither Bonn nor Ankara recognize dual citizenship. Out of 1.67 million Turks in Germany only 1,243 sought German citizenship in 1988, and only 1,713 in 1989.<sup>61</sup> This has led the German Government to conclude, falsely I believe, that "many foreigners do not want to become German citizens."<sup>62</sup>

Failure to lift the proscription on dual citizenship and to establish at least a limited variant of *Jus Soli* will lead to the continued disenfranchisement of a large segment of Germany's "foreign" population, especially Turks and those from the former Yugoslavia, and hinder their integration with, I believe,

undesireable social consequences.

Among such consequences are the firebombings of Turkish homes and businesses and refugee hostels and other attacks on "foreigners," including several murders, that peaked in 1993. To its credit the German government and local authorities have cracked down hard on such xenophobic violence, the details of which are beyond the scope of this study. It is clear, however, from other studies of the subject that the causes for such violence arise as much from identity insecurity as from the economic downturn that accompanied unification.<sup>63</sup> And, here, the main thrust of the government's response has been a belated effort to close the immigration gate or, in this case, the barn door. This effort has focused on stemming the tide of asylum seekers, admittedly the largest immigrant group in recent years. The German Government, for example, has, as of January 1, 1993, placed new restrictions on the right of return of ethnic Germans born after that date.<sup>64</sup> It has also reached agreements with Poland and the Czech Republic that recognize those now free countries as countries of "first asylum;" i.e., asylum seekers entering Germany from those countries can now be turned back. This has resulted in a sharp downturn in the number of asylum seekers entering Germany and, although cause and effect have yet to be demonstrated, a similar downturn in xenophobic violence.

An asylum policy, however, is not an immigration policy.

And the latter remains something Germans have yet to face up to. Moreover, even, were they to devise one, they would probably find out, as the British have, that an immigration policy is not a substitute for social integration. So far at least, what passes for "integration" policies in Germany are half-hearted and unsystematic language and vocational programs that are carryovers from the days of "temporary" laborers.

### C. FRANCE

The French experience is perhaps most instructive in that it combines elements of both the German and British experiences, mixing guestworkers and returning colonials, *Jus Soli* and *Jus Sanguinis*, and an early receptivity to immigrants with later popular hostility as the number of immigrants increased.

As Brubaker notes, *Jus Sanguinis* has been the "core" of French nationality law since the adoption of the Civil Code of 1804, although *Jus Soli* has always played an "important supplementary role."<sup>65</sup> In this regard, he cites two provisions of current Nationality Code (Articles 23 and 44 discussed further below) that date in substance from 1851 and 1889, making the following comments:

French nationality is attributed to a person born in France, if one of the parents was also born in France. This provision incorporates as citizens not only all third-generation immigrants but also - since "France" is understood as including Algeria and other French possessions before their independence - many second-generation immigrants, most notably children born in France of a parent

or parents born in pre-independence Algeria.

French nationality is acquired automatically at majority (18) by a person born in France of foreign parents who resided regularly in France for the previous five years.<sup>66</sup>

The result is that many - probably a majority - of the more than 3 million post-war immigrants to France and their offspring are French citizens. Socially, however, they remain as "foreign" as the non-citizen Turks in Germany. The numbers and character of this immigration are noted above and will not be repeated here. Nor, as in the German case, will there be any detailed discussion of the stuff of discrimination and racial violence. That has been well-documented elsewhere, notably in Maxim Silverman's *Deconstructing the Nation: Immigration, Racism and Citizenship in Modern France* (1992).<sup>67</sup> Suffice it to say that, as many Frenchmen have discovered a "seuil de tolerance" and as some of their politicians have sought to "out seg" each other on the issue, pressure has grown to close the immigration gate and to restrict the paths to citizenship.

The pressure, which focused in 1986 on proposals by the Chirac government to change the Code of Nationality, has been surrounded by a debate that Silverman has characterized as a "red herring." In his words:

The attribution or acquisition of French nationality certainly guarantees those rights (especially political) reserved only for French nationals. Yet it is not a solution for the wider social and economic problems which lie behind the debate. Nor is it a protection against racism. The debate should not be about nationality but

about the rights of all those resident in France and a redefinition of citizenship.<sup>68</sup>

At least during its initial stages, therefore, the debate seemed to focus on citizenship rather than, as in the case of Britain, on immigration changes as the "*deus ex machina*" for solving the country's growing problem of racism. Its emphasis was on restricting the the acquisition of citizenship via *Jus Soli*, specifically by amending Article 23 of the Code which applies to children born of foreign parents at least one of whom was born in "France" and Article 44 which stipulates that those born in France of other foreign parents acquire nationality automatically at the age of majority, providing that they have resided in France for the previous five years. To the extent that the "double *Jus Soli*" of Article 23 affected only those whose parents came from pre-independence Algeria or West Africa and that Article 44 affected primarily those whose parents came from Morocco or Tunisia, the racist nature of their proposed repeal becomes quite clear. Silverman estimates that repeal of Article 23 would have disenfranchised about 24,000 children each year, while repeal of Article 44 would have disenfranchised another 17,000 a year. The "true spirit" of the Chirac proposals, their *raison d'etre*, derived, according to Silverman, from a widely shared perception that "these people are different (culturally) from previous immigrants, they do not assimilate in the 'normal' way and therefore warrant different treatment."<sup>69</sup>

While these specific proposals were shelved, the debate continues, as do the attitudes that drive it. As Silverman notes, French Muslims still tend to be differentiated from "full" Frenchmen in negative ways carried over from the colonial experience, ways that parallel the subject/citizen dichotomy. Thus, "even those [Muslims] who managed to acquire the privileges of French citizenship did not, by that act, become equal to French citizens born and bred, for they then received the label of "evolue" or "develope," terms which implicitly suggest the passage from a lower to a higher form of existence."<sup>70</sup> Moreover, a Commission established in 1987 to consider the broad issue of nationality, has recommended, among other things, that some reform of the Code is necessary "if only to revise those articles which go back to the former colonial empire."<sup>71</sup> It also recommended that the automaticity of Article 44 be replaced by the interposition of a voluntary request for citizenship - a move that would move French law very close to German law regarding the naturalization of "foreigners". Both recommendations have broad public support from native Frenchmen who seek to clear away the residue of colonialism and redefine Frenchness *ab initio*.

It is this same desire to deconstruct and reinvent the nation from scratch that gave appeal to the push by Mitterand's Interior Minister Pasqua for "zero immigration" - a push that has led to rather draconian measures. Not only does the "Pasqua Law"



of 1986 go a long way toward closing the immigration gate but it has led to the deportation of many who had already passed through. These measures have been tightened and expanded in just the past few months and, in light of Chirac's ascendancy to the presidency and the strong showing of Le Pen's National Front in the April-May 1995 election, further movement toward "zero immigration" can be expected. It would appear, therefore, that the French immigration gate may, like Britain's, be closing. That, of course, begs the question: "Will Germany and the other countries be far behind?" But it also begs the question whether such measures at the border will solve the problem posed for these countries by their large and still growing "foreign" and largely non-citizen population. We are left, in the end, with the question: "Is there a way out of the 'European Dilemma'?"

#### CONCLUSIONS

The first step in achieving political health, as in achieving mental health, is to come to grips with reality. In the case at hand, that means dealing with the myth that surrounds the contemporary citizenship and identity of Northwestern Europeans. It is a two-fold myth. The first part of the myth, which no one any longer believes but to which many still give lip service, is that these countries are not immigration countries. They are! Through their uncoordinated and clumsy efforts to control immigration, the British and French show at least some understanding of this fact of life of the age of economic

migration. The Germans have yet to discover that an asylum policy is not an immigration policy. All of the countries of Northwestern Europe will have to devise rational immigration policies based on two simple principles. They will have to decide: 1) How many people they feel they can or need to absorb annually; and 2) What criteria will be used to determine who is included among those who get in. If this sounds like the policy of a traditional immigration country like the United States, it is because it is precisely such a policy. Having made such decisions - and the British voucher system concerning labor needs and skills strikes me as reasonable - the countries of Northwestern Europe will have to do a better job than the United States has of gaining control of their borders. This need not entail any sense of guilt, for, if citizenship is to have any meaning, it must imply not only a decision about who to include but about who to exclude. In the case of the countries under consideration in this study, all members of the European Union and many of the Schengen Agreements, these national decisions will have to be coordinated with their EU partners and probably codified into an EU-wide immigration and border control regime. The Nordic regime in this regard offers a workable model to emulate.

The second part of the myth haunting the European citizenship problematic concerns Marshall's paradigm of "social citizenship." It is the paradigm to which the social democracies

of Northwestern Europe have aspired in the post-war era. Having excluded, during the same period, increasing numbers of residents from full membership in state and society, the Northwest Europeans have diverged mightily in their policies and practices from the civic dream they profess. To be sure, they can scrap their belief in that dream. They cannot do so, however, without some cost, for, to the extent that "social citizenship" approximates the paradigm of European social democracy, giving up on one would mean giving up, at least to some extent, on the other. I don't think that Europeans could do that anymore than Americans could give up on their "Dream" without inflicting profound damage on an identity that consists as much on ideas as on ethnic or racial descent.

In practical terms, that means that Britain, France, Germany and all the countries of the EU will have to do what Sweden (and we) have already done; i.e., the decision to allow someone to immigrate must be accompanied by a decision to promote the naturalization of that person and to encourage that person not only to enjoy the rights of citizenship but to actively participate in fulfilling the obligations of citizenship. To accomplish this, Germany, for one, will have to modify its nationality law to accomodate some form of *Jus Soli*, and all the countries of the region will have ease current naturalization procedures. The current situation of several forms of citizenship and non-citizenship signifying varying degrees of

membership in the polity is just not sustainable over the long term. The Marshallian concept of full membership based on "a direct sense of community membership based on a loyalty to a civilization which is a common possession" thus remains the best hope of overcoming this "European Dilemma."

## ENDNOTES

1. The adjective "rough" is very appropriate here, especially in the United States, Canada, and Australia where skilled and relatively affluent Asian immigrants have risen rapidly up the socio-economic ladder. Even here, however, it is increasingly apparent that a large part of the country's menial work, particularly in the service sector, is being done by Hispanic immigrants - legal and otherwise - from Mexico and Central America. Because they are vulnerable - due to language difficulties and the presence of so many illegals, they are paid less than citizen workers. This, in turn, depresses the labor market for those citizens already struggling on the lower rungs of the socio-economic ladder, African-Americans and Puerto Ricans. The latter - "internal immigrants" from overseas "commonwealths," "departments," and colonies to whom the metropole has particular obligations - share similarities with France's Algerians and Britain's immigrants from its Asian, African and Caribbean colonies. In Europe, however, there is no real counterpart - save, perhaps England's Irish - to America's African-Americans and the problem created by the forced migration of slavery.

2. Gunnar Myrdal, *An American Dilemma: The Negro Problem and Modern Democracy* (New York: Harper & Row, Publishers, 1964), pp. lxxvi-lxxvii.

3. Joseph Rothschild, "Nationalism and Democratization in East Central Europe: Lessons from the Past," *Nationalities Papers*, Voll. 22, No. 1, 1994, p. 27.

4. Ibid. And, given recent recent pressures for greater regional autonomy, Rothschild might not have to wait fifty years for the division of Bohemia and Moravia. Given also, however, the mainly economic disillusionment in Slovakia, he and we might be surprised to witness someday soon the reestablishment of Czechoslovakia.

5. Bryan S. Turner's preface to Bryan S. Turner, (ed.), *Citizenship and Social Theory* (London: Sage Publications, 1993), p. vii.

6. William Rogers Brubaker, op. cit., p. 1.

7. T. H. Marshall, *Class, Citizenship, and Social Development* (Garden City, NY: Doubleday & Company, 1964).

8. Bryan S. Turner, "Contemporary Problems in the Theory of Citizenship," in Turner, op. cit., p. 6.

9. Ibid.

10. Marshall, op. cit., pp. 102-103. Emphasis mine.

11. Ibid., p. 92.
12. Ibid.
13. Ibid.
14. Ibid., p. 113.
15. Ibid., p. 112.
16. Geraint Parry, "Conclusion: Paths to Citizenship," in Ursula Vogel and Michael Moran, (eds.), *The Frontiers of Citizenship* (New York: St. Martin's Press, 1991), p. 175.
17. Ibid.
18. Marshall, op. cit., p. 88.
19. Ibid.
20. Ibid., p. 109. Emphasis mine.
21. Ibid., p. 110.
22. Ibid.
23. Ibid.
24. Eleonore Kofman, "Citizenship for Some but Not for Others: Space of Citizenship in Contemporary Europe," *Political Geography*, Vol. 14, No. 2, 1995, p. 125.
25. Ibid.
26. Ursula Vogel and Michael Moran, "Introduction," in *The Frontiers of Citizenship*, op. cit., pp. xi-xii.
27. Ibid., p. xii.
28. Ibid.
29. Jytte Klausen, "Social Rights Advocacy and State Building: T.H. Marshall in the Hands of Social Reformers," *World Politics*, Vol. 47, January 1995, p. 249.
30. Ibid., p. 265.
31. Ibid., pp. 265-66.
32. See, for example, Bryan S. Turner, "Contemporary Problems in the Theory of Citizenship;" Barry Hindness, "Citizenship in the Modern West;" and J.M. Barbalet, "Citizenship, Class Inequality and

Resentment" in Bryan S. Turner, (ed.), *Citizenship and Social Theory*, op. cit.; and Ralf Dahrendorf, "The Changing Quality of Citizenship;" Jurgen Habermas, "Citizenship and National Identity;" and Nancy Fraser and Linda Gordon, "Civil Citizenship against Social Citizenship" in Bart van Steenberg, (ed.), *The Condition of Citizenship*, op. cit.

33. Michael Ignatieff, "Citizenship and Moral Narcissism," *The Political Quarterly*, Vol. 60, No. 1, January 1989, pp. 63 and 65.

34. Ibid., p. 71.

35. Ibid., p. 70.

36. Ibid., p. 72.

37. Klausen, op. cit., p. 266.

38. Ibid., p. 267.

39. Sarah Collinson, *Europe and International Migration* (London: Pinter Publishers, 1993), p. 67.

40. Ibid., p. 66.

41. Hard figures in this regard are hard to come by. German officials I have talked to, however, suggest that another 20-30% should be added to the totals for foreign workers. That would put the total for 1991 at 2.28 to 2.47 million.

42. Messina, Anthony M., "The Two Tiers of Ethnic Conflict in Western Europe," The Fletcher Forum, Summer 1992, p.55.

43. Ibid. Emphasis mine.

44. The apparent anomaly represented by the drop in percentage of foreigners in Germany between 1990 and 1991 is explained by reunification, the latter figure being for a Germany with 18 million more Germans.

45. Again, a statistical caveat is in order with regard to Germany. While the histograms in Figure 6 look similar, the marked change in the scale on the 'Y' coordinate for Germany wildly sews the pictorial impression.

46. These include a good number of Kurds, who also make up a sizeable chunk of "Turkish" guestworker population in the countries of Northwest Europe (perhaps as high as 15-20%), and Tamils, who make up the bulk of Sweden's asylum seekers.

47. As illustrated in Figure 9 in the case of France, the foreign portion of the population in all six countries is becoming darker-skinned and less Christian as former "guestworkers" from other EU countries, who are returning home, are replaced by increasing numbers of Africans and Asians.
48. Federico, Salvatore, "The New Saracens: The EC and the Fear of Immigration," paper delivered at the European Studies Conference, Omaha, October 14-16.
49. Ole Waever and Barry Buzan, (eds.), *Identity, Migration and the Security Agenda in Europe* (New York: St. Martin's Press, 1993).
50. William Rogers Brubaker, "Introduction," in William Rogers Brubaker, (ed.), *Immigration and the Politics of Citizenship in Europe and North America* (Lanham, MD: University Press of America, 1989), p. 3.
51. Zig Layton-Henry, "Citizenship and Migrant Workers in Western Europe" in Vogel and Moran, op. cit., p. 113.
52. Curiously, such integration into the community which has - with notable exceptions (e.g., African-Americans) - been fairly easy to accomplish in the United States than has been divorced from the entitlement issue. As Fraser and Gordon have noted "the expression 'social citizenship' is almost never heard in the public debate in the United States today. Here, social provision remains largely outside the aura of dignity surrounding 'citizenship.' Receipt of 'welfare' is usually considered grounds for disrespect, a threat to, rather than a realization of, of citizenship." (Fraser and Gordon, op. cit., p. 91.)
53. William Rogers Brubaker, op. cit., p. 99.
54. So, too, did about 120,000 veterans of the Polish Armed Forces admitted permanently under the Polish Resettlement Act of 1947. See: Zig Layton-Henry, "British Immigration Policy and Politics" in Michael C. LeMay *The Gatekeepers: Comparative Immigration Policy* (New York: Praeger, 1989), pp. 60-61.
55. Ibid., p. 62.
56. Ibid., p. 70.
57. Ibid., p. 86.
58. Ibid.
59. Ibid., p. 92.



60. "Focus on German Citizenship and Naturalization," German Information Center, New York, February 1993.

61. Ibid, p. 3.

62. Ibid.

63. I have tried to summarize other such findings in another study of my own entitled "Xenophobic Violence in Western Europe: A Research Agenda" which was delivered on April 1, 1995 at the Graduate Students Conference of the Institute for Western Europe, Columbia University.

64. The immigration of these ethnic Germans or *Aussiedler* from Eastern Europe and the former Soviet Union under a "right of return" in German citizenship law offers an interesting insight into German perspectives on their own identity based on descent. It is, however, another subject beyond the immediate scope of this study.

65. Brubaker, *op. cit.*, p. 106.

66. Ibid.

67. Maxim Silverman, *Citizenship, Immigration and Racism in Modern France* (London: Routledge, 1992).

68. Ibid., p. 140.

69. Ibid., p. 143.

70. Ibid., p. 144.

71. Ibid., p. 146.