

Introduction

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CITIZENSHIP HAS EMERGED as a major thematic link connecting policy domains that range from welfare, education, and labor markets to international relations and migration. Citizenship provides this link because it brings within its orbit three fundamental issues: how the boundaries of membership within a polity and between polities should be defined; how the benefits and burdens of membership should be allocated; and how the identities of members should be comprehended and accommodated. As a simple matter of law, citizenship, or nationality, is the primary category by which peoples are classified and distributed in polities across the globe. In political theory, citizenship, understood as active participation in governing, has been the benchmark of models of democracy since Aristotle. Over the past several decades, the sheer mass of the academic literature on citizenship each year attests not only to the breadth of scholarly interest in it, but also to the extent that citizenship themes have become interwoven across academic disciplines. Finally, the continuing rise of new forms of identity politics has challenged traditional understandings of belonging and membership and has contributed to rethinking the meaning of citizenship.

Although citizenship has traditionally been conceived as primarily a domestic concern of states, the reality of immigration and emigration, the formation

The author is grateful to T. Alexander Aleinikoff and Dilek Çinar for the benefit of their comments on an earlier draft of this introduction.

of such supranational bodies as the European Union (EU), the formation of new successor states, the movement of refugee populations, and the codification of international human rights norms has prompted increasing recognition of citizenship as a transnational matter. The growing incidence of plural nationality exemplifies the transnational dimension of citizenship not only as an object of policy but also increasingly as a source and marker of social identity. The paradox in this growing incidence is that it has arisen through the interaction of citizenship rules that states, acting independently as sovereign agents, have adopted, but whose effects reach into the domestic jurisdictions of other states and invest individuals with binding affiliations to two or more states. This paradox is compounded for liberal-democratic states because their normative self-understandings are grounded in affirmations of the universal rights of individuals as human beings and the practical reality that these rights are most effectively exercised by the citizens of particular states.

This volume is the second of three that the International Migration Policy Program of the Carnegie Endowment is publishing as part of its comparative citizenship project.¹ This project has been designed to investigate citizenship policies in advanced industrial liberal-democracies. The International Migration Policy Program commissioned the articles in the first two volumes to provide background material in developing policy recommendations that address central issues of citizenship policy. Those proposals will be published in the third volume.

The current volume presents articles on citizenship from different comparative perspectives and is organized in four parts. Part one examines the leading trends in national citizenship policy regarding the rules that govern access to citizenship, the rights of aliens, and plural nationality. In investigating these national policies, citizenship is approached largely as a bundle of rights and duties. Part two expands this approach to explore how forms of citizenship and their practice are, can, and should be located within broader institutional structures. These structures range in scale and type from supranational bodies like the European Union and federal polities like the United States to “global cities.” These structures create multiple levels of citizenship both within nation-states and beyond them.

Part three builds on these themes to examine various conceptions of citizenship as developed in the official policies of government bodies, the scholarly

1. The first volume provided a series of case studies on citizenship policy in Australia, the Baltic States, Canada, the European Union, Israel, Japan, Mexico, the Russian Federation, South Africa, and the United States (Aleinikoff and Klusmeyer, 2000). As a preliminary step in the project, see also Klusmeyer (1996).

literature of the academy, and the understandings of immigrants. These different conceptions indicate not only how our understanding of citizenship is being expanded and revised, but also the concrete stakes involved in struggles over definitions. Part four addresses normative-political questions of citizenship policy and research. It challenges traditional concepts of integration that have framed much of this policy and research as a means of charting new directions for both.

Part One

That anyone has found credible a fanciful world organized into a collection of independent, self-enclosed political units that exercise complete jurisdiction over a sovereign territory is a testament to the power of state image making.² The citizenship rules of states inevitably reflect a far more complex and entangled reality, where the historical, cultural, social, and political bonds that define relations between persons and groups cross the formal borders of states and also intersect within them. States experiencing high levels of emigration, for example, have routinely exercised the right to preserve membership links with their departed nationals long after they have become the permanent residents, if not citizens, of other states. They have even maintained such links with the descendants of those residents and citizens. Thus, the movement of persons and groups across borders connects states in a global migration system. States interact in this system as both conduits and (often contentious) partners who must manage with interpenetrating, multilayered spheres of membership.

In his contribution to this volume, Patrick Weil emphasizes the importance of congruence between the definition of a state's people and their residence within its territorial boundaries in understanding differences between the acquisition rules for citizenship of various states. His survey of twenty-five state nationality laws shows that, despite often markedly different national legal traditions, a remarkable trend toward convergence is now evident among advanced industrial, liberal-democratic states around a relatively permissive combination of birthright (*jus soli*) and descent-based (*jus sanguinis*) citizenship acquisition rules.

He identifies three main factors that have encouraged states toward this convergence in their citizenship policies: (1) the influence of democratic values,

2. Thus, e.g., a leading liberal political theorist like John Rawls (1993, 12) displays no hesitation in proceeding from the postulate of a wholly bounded polity: "I assume that the basic structure is that of a closed society; that is, we are to regard it as self-contained and as having no relations with other societies. Its members enter it only by birth and leave it only by death."

(2) the stabilization of borders, and (3) a shared experience with immigration. The perpetuation of a separate subclass of aliens over generations has been recognized as incompatible with modern democratic norms and potentially dangerous to the social cohesion of states. A commitment to democratic values has forced states with restrictive acquisition rules to modify them in order to facilitate (particularly) the integration of second- and third-generation immigrants. The stabilization of borders has reduced the “disconnection” between the unitary aspirations of peoples and their division by territory, as in the case of Germany. Those states that have allowed relatively open access to residence by newcomers have moved to restrict their citizenship rules, as has the United Kingdom. Likewise, states with highly restrictive rules, such as Germany, have had to liberalize them.

In highlighting these three factors, Weil seeks to rebut arguments that attribute differences between the regimes of citizenship acquisition rules of states to expressions of particular national characters. Such arguments, as put forward in Rogers Brubaker’s (1992) influential study of modern French and German citizenship laws, have sought to draw out correspondences between features in a state’s national self-understanding and the level of restrictiveness and principles of acquisition in its citizenship policies. Instead of relying on the notoriously amorphous category of national character to explain differences in policy regimes, Weil pinpoints three concrete variables whose interplay as general causal factors may be tested and refined through further comparative research.

Complementing Weil’s approach, Christian Joppke also challenges the explanatory significance of national character through his examination of policies on the rights of aliens in Germany, the European Union, and the United States. Like Weil with respect to citizenship acquisition rules, Joppke discerns an underlying trend toward convergence around stronger guarantees of the rights of aliens irrespective of fundamental differences in the officially pronounced national self-conception of the United States as an immigration country and Germany as a “nonimmigration country.” Joppke attributes this convergence to the role that the judiciary has played since the end of World War II as the guardian of minority rights in liberal-democratic states but emphasizes the sensitivity of courts to active controversies between public opinion and resolute policy stances by other branches of government. Courts have acted most boldly in securing or expanding the rights of aliens when their decisions have been least subject to close scrutiny or to anticipated opposition.

Joppke’s analysis of the judiciary’s role in advancing the trend toward broader guarantees of the rights of aliens emphasizes the importance of domestic constitutions rather than international instruments of human rights as the founda-

tion for this trend. He contends that the courts have relied almost exclusively on the authority and rights provisions of domestic constitutions to justify their work. He directs this thesis against postnational scholars, such as Yasemin Soysal, who have argued that the development of international human rights instruments that guarantee the rights of “person(s)” is gradually displacing the importance of national citizenship that protects the rights of individuals by virtue of their state nationality. Joppke points out that Soysal and other postnational scholars have been too quick to read tangible results from the symbolic promise of these instruments and have not been sufficiently attentive to the institutional contexts that the effective enforcement of rights require.

Just as Weil and Joppke have found an international trend toward the convergence around the rules governing the acquisition of citizenship and the rights of aliens, Aleinikoff and Klusmeyer observe that an increasing number of states are relaxing their formal opposition to plural nationality and are supporting more permissive attitudes. Such supranational bodies as the Council of Europe and the European Parliament have also endorsed this more permissive policy stance. Aleinikoff and Klusmeyer review many of the traditional policy objections to plural nationality and argue that these objections are based more on conjecture than on actual, demonstrable evidence. Indeed, it is striking how little empirical documentation opponents of plural nationality (as a formal legal status) have offered to support their concerns over the threats they see it posing to the security and social cohesion of states or to the stability of international order.

The core objection to plural nationality has always turned on the issue of *divided loyalties* that this status may imply, but discussing this status has almost always involved imputing meanings to it that may or may not be held by its bearers or may be held by them incidental to this status. (This is one of those empirical questions that are routinely passed over in the debate.) Although it is not difficult, for example, to imagine that a nationality group residing in one state and feeling strong loyalties toward another could well create a highly destabilizing situation, it is quite another to ascribe this threat to the formal legal status of that minority and rather naive to assume that this status is itself the source of the tension. Moreover, whatever policy purposes are served by reducing the incidence of plural nationality may be outweighed by other important policy considerations, such as upholding the norms of gender equality. In fact, the rising incidence of plural nationality is (in part) attributable to the fact that an increasing number of states have modified their citizenship rules to reflect those norms. In light of this rising incidence, Aleinikoff and Klusmeyer conclude that states should concentrate their efforts not on reducing it, but on effectively managing it so as to minimize potentially disruptive effects.

In her contribution, Karen Knop examines plural nationality from the standpoint of gender equality. Focusing on developments in international legal conventions, she traces a two-stage process by which demands of equality have been articulated and accommodated. In the first stage, the main issue concerns establishing the right of married women to an independent nationality that is not automatically forfeited upon marriage to a foreigner and that can be retained separately over the life of the marriage. In the second stage, broader challenges of inequality facing married women have been addressed, most notably inequalities involving the right of mothers to pass their nationality to their children. Knop's analysis demonstrates clear progress in reducing the more blatant forms of discrimination that married women have encountered historically, but she also emphasizes throughout her discussion the abundant work that remains to be done in these areas.

Although this work continues, Knop sees a third stage emerging, in which the issues of gender equality will and should be approached from a more "relational," rather than individualistic, perspective. Such an approach recognizes that persons define their identities through their closest relationships with others and not as atomistic selves in abstraction from the everyday, concrete realities of their lives. One of the most fundamental relational contexts for individuals is as members of families, and the value of family unity needs now to be reintroduced, Knop argues, into a consideration of issues of gender equality. In families of plural nationals, she observes, individuals often suffer significant disadvantages or restrictions by virtue of their different nationalities, and this harm can have serious consequences for their families as a collective unit. When restrictions on a foreign national's access to the labor market impair a spouse's earning power, the effect may be felt by all family members. Gender equality requires that spouses enjoy full and equal rights to their own nationality. The interest of family unity argues for minimizing the discriminatory effects of differences in nationality among family members. Taken together, these considerations support a broadly tolerant policy toward plural nationality or citizenship.

Part Two

The European Union's recent formal recognition of a "European citizenship" that supplements the national citizenships of its member states illustrates not only the importance often attached to citizenship, at least as a symbolic marker of a polity's collective identity, but also how distinct forms of citizenship may coexist, denoting the membership affiliation of different types and reflecting different levels on which the forms are practiced. In the EU, Euro-

pean and national citizenships constitute two of these possible levels because some EU member states, such as Germany, are themselves federal bodies comprising subordinate member states. Relations between various levels are often highly dynamic as lines of authority are redefined, competition between interest groups gravitates, and jurisdictional spheres of influence are contested. The allocation of power and resources across levels can offer a flexible means by which social, political, and cultural differences may be mediated and accommodated. They can also serve to frustrate the implementation of resolute policy, reinforce divisions between contending interests, and create barriers to cooperation.

Vicki Jackson analyzes these potential strengths and weaknesses by examining how levels of citizenship are formally arranged in different models of federalism. Drawing upon a rich array of concrete examples from Europe and North America, Jackson carefully delineates the structural characteristics of different models as they bear on citizenship. She identifies three main types: (1) where the national government determines national citizenship policy and subnational governments determine the subnational policy, (2) where the national government exercises exclusive authority to make all citizenship policy, and (3) where the subnational governments hold this authority. She does not argue from normative or theoretical grounds that one of these models is preferable, but rather emphasizes the importance of particular contexts in assessing a model's suitability and of empirical criteria in measuring its success.

The principal common element of any successful model appears to be a provision for clear "rule(s) of priority" that facilitate dispute resolution between levels of government. In their structural dispersal of authority, federal systems, she observes, create multiple sites of conflict that can become intractable without an established hierarchy of rules binding on all parties. Where such rules of priority have been developed, she argues, federal models offer promising examples of how various claims and entitlements arising from multiple citizenships can be managed. The coexistence of forms of citizenship can give particular classes of individuals decided advantages in terms of available rights and benefits. Such differences may offend the fundamental norms of equality that liberal-democratic citizenship is designed to promote. Nevertheless, Jackson concludes that these differences have proved manageable when contained within a general framework that upholds norms of equality.

If multiple forms of citizenship can be a source of tension and division within a polity, the absence of effective citizenship can have still graver consequences. In his chapter, Francis Deng demonstrates the importance of citizenship as an institution by showing the consequences that occur when the formal guarantees of protection and rights that citizenship claims are grossly ignored. His contri-

bution focuses on the situation of the Banyarwanda, “a collective term for the people of Rwandan origin,” in the Great Lakes region of central Africa. The chronic manipulation of citizenship rules by states in this region in favor of one ethnic group over others has deepened the marginalization of large numbers of persons and reduced many to a status of *de facto* statelessness in states where they hold legal nationality. The combined effects of exploitation and marginalization have at times escalated to genocide.

In exploring the roots of these conflicts, Deng emphasizes the difficulties that exclusive notions of tribal and ethnic identity pose in building a broadly inclusive sense of collective nationhood. A democratic model of citizenship, he argues, can offer an important basis for promoting this progressive sense of nationhood by relying on universal membership criteria, such as common territorial residence, which can be defined independently of tribal and ethnic affiliations. He cautions that in practice such models have always displayed their own, strongly exclusionary, dimensions.

Tensions between exclusivist notions of ethnic identity and inclusivist understandings of political nationhood are hardly unique to Africa, but the legacy of colonial rule has compounded the challenges there by imposing state borders with little account for existing tribal and ethnic boundaries of affiliation. These challenges, Deng observes, have intensified as states have repeatedly failed to manage effectively their diverse peoples through an equitable sharing of power and resources.

In searching for feasible solutions, Deng suggests looking beyond membership models conceived narrowly around the unit of the nation-state and toward developing broader, regionally based institutional structures, possibly (in the future) along federal or confederal lines. Emerging in response to a half century marked by war, genocide, and ethnic conflict, the EU, he observes, may offer an example of the constructive role that supranational institutional arrangements might play in regional solutions. It also illustrates the limitations of such arrangements.

Just as significant as considerations of regionally based supranational and federal models are to discussions of citizenship is the new attention to the role of large urban centers, what Richard Ford describes as global cities. In his chapter, Ford observes that the confluence of trends known under the rubric globalization has been accompanied by countertrends toward intensive localism and subnational fragmentation. The hallmark of the former has been the internationalization of a growing web of commercial, travel, knowledge, and communication links that have radically compressed distances in time and space. The hallmark of the latter has been the revival of local attachments as a source of identity understood in terms of ethnicity, language, religion, and history.

Both these trends come together directly to shape the dynamic of global cities, as these cities typically combine extensive international connections as central sites of global commerce with ethnically diverse local populations multiplied through immigration. Because of the increasing strength of their international links, these cities, Ford observes, can exercise important, strategic roles in influencing patterns of change extending far beyond their own geographical borders and in ways vastly disproportionate to their physical size. Because the scale of civic relations and institutions within cities are locally bounded, these cities can provide effective forums wherein diverse interests can meet to find common ground for cooperation while offering room to accommodate the practice of different forms of identity. These twin features, Ford argues, make global cities promising settings for the promotion of an active, inclusive politics of democratic citizenship situated locally but linked internationally. This form of urban citizenship will certainly not replace national citizenships but can supplement and be accommodated by it.

Part Three

No single definition can adequately capture the complex, multidimensional character of citizenship as a general legal status, unitary institution, or fixed, delimited sets of practices. The forms and meanings of citizenship vary broadly according to their context; their social, political, and cultural links; and the interests and identities of those engaged with them. The definition of citizenship is not simply an analytical or empirical matter; it is also a deeply normative and political matter. Any definition of citizenship always involves choosing between rival conceptual alternatives, each carrying its own particular merits and limitations. Struggles that contest the meaning and substance of citizenship are central to its history and essential to its continued relevance.

In this book Linda Bosniak examines the contested meanings of citizenship that inform recent debates over “postnational interpretations” of citizenship. Advocates of this view have challenged traditional assumptions that locate citizenship within the framework of the nation-state. They call attention to the emergence of increasingly nonnational forms and practices of citizenship that extend beyond the immediate institutional contexts of states. To assess the merits of these challenges, Bosniak tests the plausibility of the claims supporting them against different criteria for understanding citizenship. Using these criteria enables her to clarify the main issues of dispute in the debate over citizenship.

When conceived as primarily a legal status of affiliation with a political community, this form of citizenship, she observes, is most directly located in the context of the nation-state. If it is more broadly understood as the “enjoy-

ment of rights,” then citizenship has a more expansive context because these rights are grounded not solely on the nation-state, but also on regional and international systems of human rights. The transnational dimension of citizenship is even more strongly evident, she finds, when it is viewed as a form of political activity. From many perspectives, she points out, increasing numbers of individuals and groups are working together across state boundaries to advance particular causes they believe transcend the interests of particular states. When it is approached in psychological or cultural terms as a form of collective experience or a shared source of identity, the transnational dimension of citizenship, she contends, is most immediately apparent in the ways by which migrants and members of diaspora communities understand their relationships.

Drawing from his experience as a political organizer and scholar, Paul Johnston emphasizes in his chapter the transnational aspects of the Mexican immigrant struggle for citizenship in California. He shows how that struggle is inextricably linked to a longer struggle for labor rights, and how a broad span of rights—ranging from the right to permanent residence to the right to vote to the right to an education—becomes mutually interdependent in this struggle. The California labor market, he observes, is deeply embedded in a transnational migration system, and the struggle for labor rights shapes and is shaped by the structure of employer-employee relations in this market. Family ties across the California-Mexico border strengthen transnational links and significantly influence perceptions of identity and interest.

Johnston argues for a conception of citizenship that is understood as “participation in public institutions” of many types. Since its earliest strikes in the 1970s, the Mexican immigrant labor movement, he observes, has been expanding its access to various public institutions and has thereby changed the orientations of labor unions, school boards, political parties, and municipal, state, and federal agencies. It has created the conditions for new political coalitions and influenced the calculus of electoral politics. All the activities involved in this process, Johnston contends, are aptly described as practices of citizenship, and the immigrant labor movement is itself a form of citizenship movement.

In their chapter, Micheline Labelle and Daniel Salée highlight the gap between the official discourses on citizenship promoted by the Canadian and Quebec governments and the understandings of citizenship expressed by Montreal immigrants. The federal citizenship policy of Canada, Labelle and Salée observe, reflects a tension between a commitment to maintain multiculturalism that respects the diverse origins and identities of Canada’s peoples and an increasing concern with promoting cohesion and a primary attachment to Canada. Quebec has developed its citizenship policy in the context of its effort to build a “distinct society” around the French language and heri-

tage while recognizing the distinct identities of its minorities. In contrast to the ideals espoused in these official discourses, the Montreal immigrants interviewed by the authors approach citizenship with an instrumental attitude toward its value and with skepticism toward the terms of inclusion that have been offered.

This skepticism suggests the limitations that states may face in using citizenship as a tool of integration. The immigrants expressed wariness about official definitions of collective national identity and about top-down attempts to inculcate prescribed values and beliefs. Rather, they expressed a desire to define the terms of their belonging for themselves, fashioned from their own experiences and cultural understandings. They appear to view the coexistence of diverse loyalties and multidimensional identities as far less problematic than either the Canadian or the Quebec governments have. From the perspective of these immigrants, the greatest barriers to civic inclusion, Labelle and Salée conclude, are the perceived patterns of discrimination and differentiated modes of integration encountered in their everyday lives. Perhaps, as a means to encourage civic allegiance and a fuller sense of belonging, it would be more effective for states to focus policy efforts here rather than on formal loyalty requirements in their citizenship rules.

Part Four

One of the main reasons for current debates about citizenship is a growing concern over finding new frameworks for integration amid our increasingly ethnically and racially diverse societies. *Integration* is a highly problematic concept, which, like the term *citizenship*, connotes several meanings and values to those who use it. The concept of integration is ambiguous and amorphous. Such qualities invite us to project rather uncritically our own assumptions and preferences about social cohesion, political justice, national solidarity, cultural pluralism, and economic fairness. The concept of integration, then, often carries an entire set of (at least partially hidden) normative understandings and aspirations that are seldom clearly elucidated. We are prone to think that we are “for” integration without asking specifically what that advocacy entails.

When applied to the immigration context, the concept of integration has traditionally meant the assimilation of migrants into the social and cultural environments of their host states. In recent decades, expectations that assimilation should precede the recognition of citizenship have been increasingly contested and modified in official policies. As ideas about citizenship have expanded, focus has turned to cultural rights as a distinct entitlement of citizenship for both national minorities and ethnic groups newly immigrated. Rainer Bauböck

points out in this volume that citizenship in liberal democracies has a universalist dimension that is inclusive and a particularist dimension that is often exclusionary. The former provides the basis for the incorporation of immigrants as equal citizens under the law. The latter refers to membership in a nation as a collective self-governing polity and is, as such, a primary source of exclusionary barriers to membership.

Bauböck argues that modern citizenship, as a bundle of civil, social, and political rights, needs to be supplemented by cultural minority rights. Concentrating here on the issue of the right to speak one's language, he argues that cultural rights should apply generally and include the freedom to use minority languages in both public and private for personal, commercial, political, and cultural purposes. In certain respects, he observes, the same grounds that have been invoked traditionally to defend the toleration of religious liberty apply in making a case for the toleration of different languages. Still, any attempt to draw an analogy between religious liberty and the liberty to speak one's native tongue must acknowledge the important practical difference that states cannot be neutral about language. A state must promote the use of one (or more) language(s) over others in order to conduct its internal affairs and to foster a common public culture. This promotion may place special burdens on minorities that are not adequately comprehended by similar rights designed to protect religious liberties.

To appreciate the character of these burdens, Bauböck contends that we need to understand that language not only operates as an instrument of communication, but also serves as a constituent feature of social identity and as a marker of political boundaries. Language often plays a "strategic" role in the assertion of claims to collective self-government, and Bauböck uses this political dimension of language to distinguish between the rights of national minorities to speak their native language and those of immigrant minorities. National minorities, he argues, are entitled to stronger protection of such freedom than are immigrant minorities, where the former have some claim to autonomous self-government on the basis of their historical incorporation into the polity.

In the final contribution to this book, Adrian Favell offers a broad critical review of the research on integration in Europe. He argues that, despite differences in approaches, the common assumption guiding this research has been to frame the problem of integration narrowly within the context of the nation-state model. This focus too readily accepts the categories and structures of state institutions as the organizational terms for understanding the challenges of ethnic and racial diversity. These terms obscure the complex, multilayered patterns of relations that characterize the migration experience, give it dynamics of its own within the nation-state, and extend in innumerable directions outside this context. These

terms presuppose a simplistic dichotomy between “state” and “society” that reduces the interaction of groups and persons in society to one-dimensional objects of policy management by state administrative agencies.

The guiding assumption of this research strongly reflects, Favell contends, the material conditions that have shaped its production and most especially the state sponsorship of academic work on issues that governments find useful for their purposes. Academic scholars have been attracted by the combined lures of generous financial support and the (often illusory) expectation of influence in policy making. Although much of the work produced under these circumstances has been of high quality, policy intellectuals have failed to appreciate how much state-approved research agendas influence the types of questions posed, the methods used in gathering data, and the results obtained.

In the process, the criteria by which “integration” is measured have become imprinted by the norms of the state’s bureaucratic management perspective. Rather than challenge this perspective by investigating how the bureaucratic apparatus of the state itself is implicated in the systematic causes of inequality, modes of racial and ethnic exploitation, and social marginalization, policy intellectuals have focused on devising reforms within the established political-legal framework of the state. This focus is most directly evident in their choice of citizenship policy as the primary object of their research.

In fashioning this critique, Favell aims not only to contest the dominant paradigm shaping integration research, but also to open new lines of inquiry for conducting comparative studies that might be both more sensitive to concrete differences of particular contexts and less state-centered in approach. He proposes a set of guiding elements for future research that uses the city as the common unit of comparison. This unit, Favell concludes, offers an excellent vantage point from which to view the interaction of local, national, and transnational influences on the challenges of integration in our increasingly diverse societies.

The chapters in this volume amply demonstrate the value of comparative perspectives in the consideration of citizenship policy. Comparisons across states offer a kind of laboratory for testing the causal significance of particular variables and for identifying broader patterns. Comparisons across different locations of membership provide a basis for analyzing the myriad ways by which citizenship is exercised and structured. Comparisons of definitions or forms of citizenship help to clarify normative and political issues in the formulation of policy.

Like *alien*, *citizen* is one of the primary categories by which states define membership. States attach important rights and duties to such formal catego-

ries, so their definition has both practical and material significance. Struggles over the definition of citizenship, then, are not mere semantical or rhetorical games, but rather, as Bosniak argues, they involve serious questions about the allocation of status, power, and resources in a society.

The attribution of formal citizenship has always been as much an act of exclusion as of inclusion. In both theory and practice, the history of citizenship demonstrates how narrow and contingent those criteria have been and that those criteria are constantly subject to challenge, revision, and compromise. Citizenship, then, is a powerful instrument of selection that allocates finite membership in particular polities across a universe of persons and peoples.

Even when understood as solely a formal category of law, citizenship can also be a potent source and marker of social identity. States do not readily comprehend individuals and groups as human beings, but rather recognize them by their status within such categories. As Hannah Arendt observed,³ the Nazis were able to rob the Jews of their perceived common humanity under the Third Reich by first stripping them of their legal status as citizens, thereby effectively rendering them “nonpersons” in the eyes of their “German” neighbors, and, in the view of other states, outside the protection of law.

This book brings together a collection of articles from a rich variety of comparative perspectives. The collection is designed to provide a foundation for developing new answers to difficult policy questions involving citizenship. Such questions, as well as any answers to them, must by nature have a provisional character, but the authors in this volume show how far we have come over the past two decades in improving our ability to do both.

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3. See discussion in Klusmeyer (1996), 69–76.