

## IMMIGRATION, CITIZENSHIP, AND THE NATION-STATE IN FRANCE AND GERMANY: A COMPARATIVE HISTORICAL ANALYSIS

William Rogers Brubaker

*Abstract* Massive post-war migrations have posed a fundamental challenge to the nation-states of North-Western Europe. Constructing an ideal-typical model of nation-state membership, this paper begins by specifying the multiply anomalous character of the membership status of immigrants. Next, it seeks to explain the striking and persisting difference in the citizenship status and chances of immigrants in France and Germany. While birth and residence in France automatically transform second-generation immigrants into citizens, birth and residence in Germany have no bearing on citizenship. *Vis-à-vis* immigrants, the French citizenry is defined expansively, as a territorial community, the German citizenry restrictively, as a community of descent. These diverging definitions of the citizenry embody and express distinctive understandings of nationhood, state-centred and assimilationist in France, ethnocultural and 'differentialist' in Germany. Focusing on pivotal moments in the shaping and reshaping of citizenship law – the 1880s in France, the Wilhelmine era in Germany – this paper argues that the politics of citizenship *vis-à-vis* immigrants has been informed by distinctive national self-understandings, deeply rooted in political and cultural geography and powerfully reinforced at particular historical conjunctures.

Citizenship and nationhood have recently become intensely contested issues in European politics. The reactivation of these long dormant issues reflects the sharply increased volume and ethnocultural diversity of immigration during the last quarter-century. The demographic legacy of Europe's 'new immigration' is the large and unprecedentedly diverse population of immigrant origin;<sup>1</sup> its political legacy is the intensifying debate about citizenship and nationhood.

This paper addresses the emerging European politics of citizenship and nationhood in historical and comparative perspective. It begins by evoking in general terms the challenge posed by immigration to the nation-state. Constructing an ideal-typical model of nation-state membership, it highlights

\*This is a revised and expanded version of the paper submitted in 1989 to the International Sociological Association's 'Worldwide Competition for Young Sociologists'. Research for the dissertation on which this paper is based was generously supported by grants from the Graduate School of Arts and Sciences of Columbia University; the French Government; the Institute for the Study of World Politics, with funds provided by the Compton Foundation; and the Joint Committee on Western Europe of the American Council of Learned Societies and the Social Science Research Council, with funds provided by the Ford Foundation, the William and Flora Hewlett Foundation, and the French-American Foundation. For comments on preliminary versions of this paper, I would like to thank Allan Silver, Vida Azimi, Uwe Anderson, Klaus Bade, Zsuzsa Berend, Pierre Bourdieu, Jürgen Fijalkowski, Herbert Gans, Klaus-Martin Groth, Tomas Hammar, Bill Heffernan, Lutz Hoffmann, James Hollifield, Jürgen Kocka, Jean Leca, Robert Miles, Mark Miller, László Neményi, William Outhwaite, Rosemarie Rogers, Joseph Rothschild, Peter Sahlins, Jean-Louis Schlegel, Rudolf von Thadden, Seamus Thompson, Dietrich Thränhardt, Myron Weiner and Aristide Zolberg.

the several respects in which the membership status of today's immigrants is politically anomalous. Next, focusing on the problem of admission to citizenship, the paper analyses the wide variation in European citizenship law and naturalisation practice. It then examines in detail one striking instance of this variation – French readiness and West German reluctance to transform immigrants into citizens. The expansive French politics of citizenship *vis-à-vis* immigrants, it argues, reflects a state-centred, assimilationist, essentially political national self-understanding, while the restrictive German politics reflects an ethnocultural understanding of nationhood as prior to and independent of the state. The paper analyses the genesis and development of these distinctive traditions of nationhood and concludes by showing how they shaped the development of citizenship law – and thereby the citizenship status and chances of immigrants – in France and Germany.

*Citizenship in the nation-state: a model of membership*<sup>2</sup>

Debates about citizenship, in the age of the nation-state, are debates about nationhood – about what it means, and what it ought to mean, to belong to a nation-state. As an institutional and social-psychological reality, the nation-state is a distinctive way of organising and experiencing political and social membership. But the nation-state is also an idea – and an ideal: it is a distinctive way of characterising and evaluating political and social membership. As an ideal-typical model of membership, the nation-state can be characterised in terms of six membership norms. According to this model, membership of the nation-state should be *egalitarian*, *sacred*, *national*, *democratic*, *unique* and *socially consequential*.<sup>3</sup> Inherited from the classical age of the European nation-state, these norms continue to inform political talk about nationality, citizenship, immigration, military service, the welfare state, patriotism, national identity, and other subjects bearing on membership. In sketching these norms, I do not mean to endorse them. I want simply to characterise the backdrop of taken-for-granted ideas and ideals against which the politics of immigration and citizenship unfolds today.

Membership of the nation-state, according to the ideal-typical model, should be *egalitarian*. There should be a status of full membership, and no other (except in the transitional cases of children and persons awaiting naturalisation). Basic and enduring gradations of membership status are inadmissible. This norm derives, most immediately, from the French Revolution, which opposed a unitary, unmediated, undifferentiated, and therefore (formally) egalitarian conception of state-membership to the plural, differentiated, essentially inegalitarian ancien-régime notion of state-membership as mediated by corporate bodies.<sup>4</sup>

Second, membership should be *sacred*. Citizens must make sacrifices – etymologically, perform 'sacred acts' – for the state. They must be prepared to die for it if need be (Walzer 1970a; Contamine 1986). Profane attitudes toward membership, involving calculations of personal advantage, are profoundly inappropriate. The sacralisation of social and political membership, to be sure, long antedates the French Revolution. But the modern democratic,

national, and (paradoxical though it may sound) secular understanding of the sacredness of social and political membership, like the modern understanding of state-membership as essentially egalitarian, dates from the French Revolution.<sup>5</sup>

Third, state-membership should be *based on nation-membership*. The political community should be simultaneously a cultural community, a community of language, mores, and character.<sup>6</sup> Only thus can a nation-state be a nation's state, the legitimate representative and the authentic expression of the nation. Those aspiring to membership of the state must be or become members of the nation. If not (presumptively) acquired through birth and upbringing, such nation-membership must be earned through assimilation.<sup>7</sup> This norm, unlike the egalitarian and sacralising components of the nation-state model, derives not directly from the French Revolution but from the nineteenth-century national movements it helped set in motion.

Fourth, membership should be *democratic*. Full membership should carry with it significant participation in the business of rule. And membership itself should be open: since a population of long-term resident non-members violates democratic understandings of membership, the state must provide some means for resident non-members to become members. Over the long run, residence and membership must coincide. Like the national idea, the democratic idea derives indirectly from the French Revolution and directly from the democratic movements of the nineteenth century.

Fifth, state-membership should be *unique*, i.e. exhaustive and mutually exclusive. Every person should belong to one and only one state. The orderliness of inter-state relations requires that this norm be at least approximately realised in a world that is 'filled up' with states, each of which claims a fraction of the human population as its own, for which it has special responsibility and on which it can make special demands. Statelessness, as Hannah Arendt (1973: 290–302) has shown with particular poignancy, can be catastrophic in a world in which even so-called human rights are enforceable for the most part only by particular states. And dual (or multiple) citizenship has long been considered undesirable for states and individuals alike. There are legal techniques for regulating and mitigating the conflicts, inconveniences, and ambiguities it occasions. But these techniques cannot solve the central political problem of dual citizenship – the problem of divided allegiance.<sup>8</sup>

Lastly, membership should be *socially consequential*; it should be expressed in a community of well-being. Membership should entail important privileges. Together with the sacralised duties mentioned above, these should define a status clearly and significantly distinguishable from that of non-members.<sup>9</sup> Membership should be objectively valuable and subjectively valued – it should be prizable and actually prized.

*Immigration and anomalies of membership*

This model of membership is largely vestigial. As such, it is significantly out of phase with contemporary realities of state-membership. Conspicuous

deviations from the model occur quite independently of immigration. The desacralisation of state-membership, for example, has more to do with the emotional remoteness of the bureaucratic welfare state (Walzer 1970b : 204; Kelly 1979 : 22) and the obsolescence of the citizen army in the nuclear age (van Doorn 1975) than it does with immigration and occasional naturalisations of convenience. And if citizenship today is not very robustly democratic, this has more to do with the highly attenuated participation of most citizens in the exercise of sovereignty than it does with the exclusion of non-citizens from the franchise.

Still, post-war immigration has accentuated existing deviations from the nation-state model and generated new ones. These include the proliferation of statuses of partial membership (Brubaker 1989b : 16–20, 1989d : 160–2; Hammar 1990); the declining value of citizenship (Schuck 1989); the desacralisation of membership through the calculating exploitation of the material advantages it confers (Sayad 1982 : 28ff; Brubaker 1990a : 319–26; Schuck and Smith 1985 : 95, 109–12); the increasing demands for, and instances of, full membership of the state without membership of the cultural nation (Minces 1985; Centre de Relations Internationales 1984; Griotterary 1984); the soaring numbers of persons with dual citizenship (Hammar 1989; Brubaker 1989c : 115–7; Costa-Lascoux 1988 : 108–16); and the exclusion of large numbers of long-term residents from the franchise (Oriol 1985 : 138–43, 149–51; Balibar 1984). These trends in the organisation of membership deviate from every component of the nation-state model; and all arise from the unexpected development of post-war immigration to North-Western Europe.<sup>10</sup>

Unexpected: for the settlers of today were the sojourners of yesterday – temporary labour migrants, segregated from and invisible to the surrounding society, existing (for the host society) only in the sphere of work. By definition, neither strictly temporary labour migration nor unambiguous and accepted immigration for purposes of permanent settlement poses insuperable problems of membership. But the gradual transformation of sojourners into settlers, only partially and belatedly acknowledged both by immigrants and the receiving country, generates complex and delicate problems of membership.<sup>11</sup>

The membership status of these migrants-turned-immigrants has developed in an ad hoc fashion with the piecemeal administrative, legislative, and judicial acknowledgement of their potentially permanent status (Miller 1986). This process of piecemeal inclusion contrasts with the 'total' transformation effected by naturalisation. Paradoxically, the further this process of piecemeal inclusion has gone, the weaker the incentive to naturalise. Ad hoc enlargements of migrants' rights may thus obstruct rather than clear the path to full membership, trapping large numbers of migrants-turned-immigrants in an intermediate status, carrying with it many of the privileges and obligations of full membership but excluding two of the most important, symbolically and practically: the right to vote and the duty of military service.

The immigration was unexpected, too, in its volume, which peaked at very high rates in 1968–72, and in its provenance, with the 1950s immigrants from

neighbouring countries giving way to their geographically and culturally more distant successors of the late 1960s and early 1970s (and to the Third World refugees of the late 1970s and 1980s). Against the backdrop of the norms of membership sketched above, the triply unexpected quality of the post-war immigration – unexpected in its permanence, volume, and ethnocultural heterogeneity – helps to explain Europe's profound political uncertainty in the face of today's increasingly settled and increasingly assertive immigrant population.

Not everyone shares this uncertainty, of course. Nationalists defend the integral validity of the classical model of the nation-state, stressing that state-membership presupposes nation-membership. Post-national pluralists, on the other hand, deny any validity to this model, arguing for new forms of political membership that would mirror an emerging multicultural, post-national society. The former demand of immigrants either naturalisation, stringently conditioned upon assimilation, or departure; the latter demand for immigrants a full citizenship stripped of its sacred character and divorced from nationality. Neither position is particularly nuanced. Neo-nationalists treat the nation-state as something frozen in social and political time; theirs is a profoundly anachronistic interpretation, neglecting the specific contexts in which the membership norms emerged and to which they responded. Post-national pluralists, in their haste to condemn the nation-state to the dust-bin of history, underestimate the richness and complexity of a normative tradition that, reinterpreted to take account of the changing economic, military, and demographic contexts of membership, may have life in it yet.

#### *Admission to citizenship*

This, then, is the ideological backdrop against which the contemporary politics of citizenship and social membership is played out. The ideas and ideals sketched above, however, are riddled with internal tensions and contradictions. And there are marked variations over historical time and political space in the normative and institutional construction of nation-statehood. These tensions, contradictions, and variations will be the focus of the rest of the paper.

So long as one talks about the nation-state in abstraction from concrete problems of nation-statehood, one can gloss over these internal tensions, these historical and national variations. But the tensions and variations are inescapable when one addresses concrete questions of membership. Consider the question of admission to citizenship. It is immediately evident that the norms of membership sketched above point in different directions. The norms of egalitarian and democratic membership require the admission of long-term residents to full citizenship. But the norms of unique, sacred, and national membership can be used to justify a series of more or less restrictive preconditions for admission.<sup>12</sup> At the limit, these may be sufficiently dissuasive to block the large-scale incorporation of immigrants as citizens.

The model of membership developed above, then, provides a matrix of arguments bearing on the question of admission to membership, but no

univocal answer to this question. This normative ambivalence is mirrored by institutional variety. This is evident, first, in the special provisions – or lack thereof – for the admission of second-generation immigrants to citizenship. At one pole, traditional countries of immigration like the United States, Canada, and most Latin American countries attribute citizenship unconditionally to all persons born in the territory. At the other pole, Germany and Switzerland have no special provisions for second-generation immigrants. In intermediate cases, some combination of birth and/or residence suffices for the quasi-automatic or declarative acquisition of citizenship. In France and the Netherlands, for example, persons born in the territory and residing there for a certain length of time can opt for citizenship at majority. In Sweden and Belgium, persons brought up in the territory, even if not born there, can acquire citizenship through simple declaration.

Immigrants and their descendants not benefiting from these and certain other special provisions<sup>13</sup> can accede to citizenship only through naturalisation. Here too, the range of variation is wide. At one pole, naturalisation is a purely discretionary decision of the state. The candidate must fulfil certain conditions that are often only vaguely specified; in addition, the state must judge whether or not the granting of citizenship is in its own interest. A negative decision need not be justified, and cannot be appealed against. In such a purely discretionary system, geared to a low volume of immigration, naturalisation is an anomalous and infrequent event, a privilege bestowed by the state, after careful scrutiny, on certain deserving individuals. The state does not promote naturalisation, and may indeed discourage it by imposing a high fee and a bafflingly complex procedure.

At the other pole, all candidates meeting certain clearly specified conditions are naturalised. In this system, adapted to mass immigration, naturalisation is expected, while the failure to naturalise is anomalous. Naturalisation is actively promoted by the state. The procedure is simple, the scrutiny of most applications is perfunctory, and the fees are low.

Roughly speaking, the systems of naturalisation in place in the United States, to a greater extent in Canada, and to a surprising extent also in Sweden, approach the latter pole, while those in Switzerland and especially in Germany approach the former. This is indicated by their results. Taking Germany as a base, foreign residents naturalise at a rate four times higher in France, ten times higher in the United States, fifteen times higher in Sweden, and over twenty times higher in Canada (Brubaker 1989c : 117–20).

There are major differences, then, in the extent to which Europe's post-war immigrants have been incorporated as citizens. These differences have been largely neglected in the literature on immigration.<sup>14</sup> In the socio-economic perspective that prevails in this literature, citizenship is of minor importance. What really matters as a determinant of life chances, it is argued – and here I am in full agreement – is immigrants' social, economic, and cultural marginalisation, determined by their weak position in the labour market, the housing market, and the educational system, a position that results in part from their status as ethnocultural minorities but is largely independent of formal citizenship status. It is clear from the experience of the United States

and Britain that the possession of full formal citizenship does not impede the development of multiply disadvantaged ethnocultural minorities.

Even in the 'life chances' perspective, however, formal membership status is important, indeed increasingly important. As a result of the widening demographic and economic rift between the First and the Third World and the simultaneous eclipse of distance between the two through the mutually reinforcing links of transportation, communication and migration, the demand for entry into the more prosperous and peaceful territories of the earth is greater than ever before (Zolberg 1983). In these circumstances, the state's control, imperfect though it remains, over admission to and residence in its territory (and thus, indirectly, over admission to its labour markets and to its welfare institutions) has never been more important. The crucial status in this respect, however, is not citizenship but the status of 'privileged', 'established' or 'permanent' resident, which confers an ordinarily irrevocable right of residence as well as civil and socio-economic rights virtually identical to those of citizens (Schuck 1989; Brubaker 1989d). In terms of life chances, then, the decisive gap is between privileged non-citizen residents and persons, inside or outside the territory, without long-term residence rights. Full citizenship adds complete protection against expulsion and complete access to public service employment, but its marginal contribution to life chances is seldom decisive.

But if citizenship status is not a decisive determinant of immigrants' life chances, it remains a crucial determinant of their place in the polity and, more broadly, of the general character of politics in the countries of post-war immigration. This is not to imply that non-citizen immigrants are politically mute (Miller 1989). Nor is it to attribute miraculous virtues to universal suffrage: the possession of full political rights does not guarantee their effective exercise, particularly by a group singularly lacking in political resources. It is simply to recall the obvious: the fact that the exclusion or self-exclusion of immigrants from formal citizenship is tantamount to the disfranchisement of a significant fraction of the population, and of a much higher fraction of the manual working class; and that the interests of disfranchised groups do not count for much in the political process. The substantial cross-national variation in the civic incorporation of post-war immigrants thus deserves more attention than it has to date received.

#### *Traditions of nationhood and politics of citizenship*

The model of nation-state membership sketched above, then, is ambivalent with respect to the admission of immigrants to citizenship. But the model in its general form corresponds to no socio-political reality. 'The' nation-state is a figment of the sociological imagination. What exists are particular nation-states, formed under particular historical circumstances, bearing even today the stamp of these distinctive historical origins, and, in consequence, unequally disposed to accept immigrants as citizens.

This is an argument that I want to develop with respect to the exemplary pair<sup>15</sup> of France and Germany. French conceptions of nationhood and

citizenship bear the stamp of their monarchical gestation, Revolutionary birth, and Republican apotheosis. The nation, in this tradition, has been conceived in relation to the institutional and territorial frame of the state: political unity, not shared culture, has been understood to constitute nationhood. Revolutionary and Republican definitions of nationhood and citizenship – militantly unitarist, universalist and secular – reinforced what was already in the *ancien régime* an essentially political understanding of nationhood. But if nationhood is constituted by political unity, it is centrally expressed in the striving for cultural unity. Political inclusion has ideally entailed cultural assimilation, for ethnic peripheries and immigrants alike; the universalist theory and practice of citizenship have depended on confidence in the assimilatory workings of school, army and centralised administration.

If the French conception of nationhood has been universalist, rationalist, assimilationist and state-centred, the German conception has been particularist, organic, differentialist and *Volk*-centred. Because national feeling developed before the nation-state, the German idea of the nation was not, originally, a political one, nor was it linked with the abstract idea of citizenship. This pre-political German nation, this nation in search of a state, was conceived not as the bearer of universal political values, but as an organic, cultural, linguistic or racial community – as an irreducibly particular *Volksgemeinschaft*. On this understanding, nationhood is constituted by ethnocultural unity and expressed in political unity. While this ethnocultural self-understanding was overlaid by a more state-centred self-understanding under Bismarck, it has remained influential and is expressed even in certain provisions of the Basic Law of the Federal Republic.<sup>16</sup>

As one would expect, citizenship is more accessible to immigrants in France (where it is defined in political terms) than in Germany (where membership is defined in ethnocultural terms).<sup>17</sup> Immigrants naturalise (or are automatically defined as citizens) at a rate ten times higher in France than in Germany.<sup>18</sup> The policies and politics of citizenship in France and Germany have been strikingly different since the late nineteenth century and remain so despite converging immigration policies and comparable immigrant populations.

The post-war migrations, to be sure, have placed considerable strain on both French and German self-understandings. The French tradition of assimilation has been challenged both by the multiculturalist left, arguing that immigrants *should not* be assimilated, and by the exclusionary right, arguing that they *cannot* be assimilated. In Germany, on the other hand, even the present conservative government has had to acknowledge that large numbers of Turkish migrants have become permanent immigrants, and has proclaimed a public interest in the naturalisation of second-generation immigrants.

Yet prevailing understandings of nationhood continue to inform the politics of citizenship. A French campaign for a more restrictive politics of citizenship, taken up by the centre-right under pressure from the far right, encountered strong resistance, which ultimately led the government of Jacques Chirac to withdraw its proposed reform of citizenship law from the legislative agenda in December 1986. Critics of the proposed reform included the august Council of State, which characterised it as 'contrary to Republican

tradition and principles'. And the commission appointed by the government to study the issue proposed enlarging rather than restricting access to citizenship (Commission de la Nationalité 1988; Brubaker 1990a : Ch. 8). In Germany, proposals to liberalise access to citizenship for foreign workers and their families have foundered repeatedly on the objection that Germany is not and cannot become a country of immigration. Yet the prevailing understanding of nationhood has sustained citizenship claims for East Germans and ethnic Germans from Eastern Europe and the Soviet Union despite the fact that this extraordinarily open definition of citizenship engendered an influx five times as large, in relation to population, as legal immigration to the United States in 1989 (Brubaker 1990a : Ch. 9).

Despite a certain rhetorical convergence, then, the policies and politics of citizenship for immigrants remain strikingly different in France and Germany. They have resisted pressures for convergence, I want to argue, because they have been shaped by distinctive traditions of national self-understanding, grounded in differing historical paths to nation-statehood.

The next four sections offer what Clifford Geertz (1971 : 19) has called a 'condensed and generalised' history of these traditions, considering successively: (1) their roots in the political and cultural geography of early modern Europe; (2) the crystallization of the French national self-understanding during the Revolutionary period; (3) the development of German national self-understanding in reaction to the Revolution and Napoleonic domination; and (4) the consolidation of the French nation-state and the founding of a German nation-state in the nineteenth century. The final sections sketch the bearing of these traditions on the development of sharply differing citizenship law in France and Germany.<sup>19</sup>

#### *State-building and the geography of nationhood*

The nation-state that was invented during the French Revolution was heir to centuries of state-building, and to the gradual development of national consciousness *within* the spatial and institutional frame of the developing territorial state. The Bismarckian quasi-nation-state also succeeded to long traditions of state-building and national consciousness, but the two traditions – one Prussian, one German – were radically distinct, even incompatible, in territorial frame, social base and political inspiration. The Prussian tradition of state-building was not only sub-national and, after the partitions of Poland, supra-national: it was also, in principle, anti-national; while German national consciousness developed *outside* and – when national consciousness became politicised – *against* the territorial and institutional frame of existing states.

This is not to say that national consciousness had no political-institutional mooring in Germany. The medieval and early modern Empire – the Holy Roman Empire of the German Nation, as it came to be called, not without ambiguity, in the sixteenth century – was the institutional incubator of German national consciousness, analogous in this respect to the Capetian monarchy in France. But to the progressive conceptual fusion of nation and kingdom in France corresponds the conceptual differentiation of nation and

supra-national Empire in Germany; and to the early consolidation and progressively increasing stateness of the French monarchy, with its integrative workings on national consciousness, corresponds the thirteenth century disintegration and subsequent 'non-stateness' of the Empire. The Empire with its increasingly rickety institutions survived into the nineteenth century but, lacking the integrative power of a centralising bureaucratic administration, failed to shape a firmly state-anchored national consciousness. German national consciousness was never purely cultural, purely apolitical: but while it was linked to the memory and to the anticipation of effective political organisation, it was for six centuries divorced from the reality. In France, then, a political-territorial conception of nationhood reflected the early nationwide reach of the monarchy, while in Germany, an ethnocultural conception of nationhood developed in the space between the supra-national Empire and the sub-national profusion of sovereign and semi-sovereign political units.

I am not suggesting that the sense of membership or 'identity' was primarily ethnocultural in medieval or early modern Germany. To the extent that anachronistic talk of 'identity' makes sense at all, the subjective 'identity' of the vast majority of the population throughout Europe was no doubt largely local, on the one hand, and religious, on the other, until at least the end of the eighteenth century. The point is a structural, not a social-psychological one. The political and cultural geography of central Europe made it possible to conceive of an ethnocultural Germany whose roughly imagined extent coincided neither with the supra-national pretensions of the Empire nor with the sub-national reach of effective political authority. As a result of the triangular relation between supra-national Empire, sub-national *Klein-staaterei*,<sup>20</sup> and ethnocultural nation, consciousness of political and cultural membership – among the strata that were carriers of such supra-local group consciousness – was distributed across and differentiated with respect to a greater variety of units in Germany than in France, each with its own distinctive co-ordinates of reference. Without denying the complexity of patterns of state-building in France, it may nonetheless be said that a structural space for the differentiation of nation and state, and thus a space for the development of an ethnocultural understanding of nationhood, existed in Germany but not in France.

Even before the French Revolution, then, the nation was conceived in a different manner in France and Germany. This difference was brought into sharper focus in the second half of the eighteenth century, when the idea of nationhood was first given self-conscious theoretical elaboration. In France, writings of reformist *philosophes* and discussions of the urban public conceived the nation in polemical opposition to the variously privileged orders and corporations of *ancien régime* society, giving the concept a critical edge and a new, dynamic political significance. The *cahiers de doléance*, moreover, suggest that a high political charge was attached to the idea of the nation by the population at large in the immediately pre-Revolutionary period (Godechot 1971 : 494). Coinciding with the politicisation of nationhood in pre-Revolutionary France, however, was its unprecedented depoliticisation in late eighteenth century Germany. In the

writings of the flourishing *Bildungsbürgertum*<sup>21</sup> of the epoch, the German nation was conceived less and less frequently in the traditional political context of the Empire and more and more frequently as an apolitical, ethnocultural entity – as an 'inward Empire', as Schiller put in 1801, when the old Empire had entered its final phase of disintegration (Conze 1985 : 29–30) or as a *Kulturnation*, in the later formulation of Friedrich Meinecke. If this *bildungsbürgerlich* understanding of nationhood was never exclusively cultural, its political dimension was nonetheless in deep recess during the late eighteenth and the first years of the nineteenth century (Meinecke 1919 : Ch. 2). Elaboration of the idea of nationhood in the second half of the eighteenth century in France and Germany, then, was the work of a broad bourgeois stratum in France and of a narrower, purely literary, stratum in Germany; more important, it was oriented to the reform of an existing nationwide state in France but was identified with a purely cultural, indeed a specifically literary, national spirit (*Nationalgeist*) in Germany.

### *The revolutionary crystallisation*

It was the Revolutionary era that decisively fixed the contrast between the French political and the German ethnocultural construction of nationhood. Theorists of the nation in late eighteenth-century France had called for the reform of an existing state. When reform failed, the radicalised third estate constituted itself as the National Assembly and proclaimed the sovereignty of the nation.<sup>22</sup> Membership of this sovereign nation was conceived and institutionalised in the political-legal form of citizenship; nationality, as an ethnoculturally or even a legally defined quality distinct from citizenship, is absent from the Revolutionary constitutions. The dominance of citizenship over nationality, of political over ethnocultural conceptions of nationhood, is perhaps best expressed in Tallien's remark of the spring of 1795: 'the only foreigners in France are the bad citizens'.<sup>23</sup> Qualifications for membership were of course disputed during the Revolutionary epoch, but such disputes turned on a political rather than an ethnocultural axis.

So too did the question of the territorial boundaries of the new nation-state. The principle of self-determination, pregnant with immense disruptive potential for a dynastically organised and ethnoculturally intermixed Europe (Kedourie 1985), was invoked to justify the territorial gains of 1791–3, and even to reinterpret retrospectively the terms of the accession of Alsace to France in the seventeenth century (Soboul 1960 : 63; Godechot 1983 : 69). But the collective 'self' entitled by revolutionary doctrine to self-determination was conceived in the cosmopolitan, rationalistic terms characteristic of the eighteenth, not in the Romantic terms characteristic of the nineteenth century.<sup>24</sup> The point of self-determination as understood by the Revolutionaries was to give expression to the universal desire for liberty and thus – how could it be otherwise? – for incorporation into France; it was emphatically not to permit the projection of ethnocultural identity onto the political plane.

Even the briefly if radically assimilationist linguistic politics of the Revolution was determined by political considerations rather than by any

conception of the nation as an ethnolinguistic entity. Linguistic variety was denounced as conducive to reaction, linguistic unity advocated as indispensable to Republican citizenship.<sup>25</sup> This short-lived assimilationist politics was not of great consequence. Such linguistic unification as in fact occurred during the Revolutionary and Napoleonic period was due rather to the indirectly assimilationist workings of the army, the schools and the Napoleonic administrative machine (Kohn 1967 : 90–3). Yet the ideological and practical importance of assimilation in the French tradition and the bad name that assimilation has acquired in the last two decades justify a more general observation. Assimilation – i.e. a deliberate policy of making similar – is incompatible with all consistently ‘organic’ conceptions of membership, according to which ‘natural’ ethnolinguistic boundaries are prior to and determinative of national and (ideally) state boundaries. It is one thing to want to make all citizens of Utopia speak Utopian, and quite another to want to make all Utopiphones citizens of Utopia. Crudely put, the former represents the French, the latter the German model of nationhood. Whether juridical (as in naturalisation) or cultural, assimilation presupposes a political conception of membership and the belief, which France took over from the Roman tradition, that the state can turn strangers into citizens, peasants – or immigrant workers – into Frenchmen.<sup>26</sup>

If the French nation-state was invented in 1789, French nationalism was a product of war.<sup>27</sup> Before the outbreak of war, nationalism existed neither as a ‘blind and exclusive preference for all that belongs to the nation’ nor as a ‘demand in favour of subject nationalities’.<sup>28</sup> Only from 1792 on, when the new order felt itself besieged by enemies within and enemies without, did there develop, superseding the ostentatious fraternal cosmopolitanism and pacifism of 1789–91,<sup>29</sup> and justified by the doctrine of the ‘*patrie en danger*’, elements of an exclusivistic nationalism directed against foreigners inside the territory (Azimi 1988) and an expansive, aggressive, nationalism directed abroad, originally missionary and crusading, later simply imperialist and triumphalist.<sup>30</sup> This emergent internal and external nationalism had throughout a political-ideological, not an ethnocultural character. But it contributed to the later emergence, during the Napoleonic period, of a German counter-nationalism in which ethnocultural motifs came to play an important role. Revolutionary expansion, itself driven by political nationalism, thus engendered ethnocultural nationalism; the ‘crusade for liberty’ elicited in response the myth, if not the reality, of a ‘holy war’ of ethnonational resistance.

### *Romanticism and reform in Germany*

The German tradition of nationhood was crucially formed during the Revolutionary era by the Romantic movement, on the one hand, and the Prussian reform movement, on the other, both occurring in the shadow of the French occupation of Germany (Kohn 1967). The Romantic movement, though not itself centrally concerned with nationhood, supplied patterns of thought and appraisal for the consolidation, celebration, and eventual

repoliticisation of the ethnocultural understanding of nationhood; while the Prussian reformers, appealing to a radically different conception of nationhood, aimed to ‘nationalise’ the Prussian state from above and thus to regenerate the state after the catastrophic defeat of 1806.

The aesthetic and socio-historical idiom of German Romanticism was perfectly suited to the elaboration of the ethnocultural conception of nationhood. The celebration of individuality as *Einzigkeit* or uniqueness as over against *Einzelheit* or mere oneness; of depth and inwardness as over against surface polish; of feeling as over against dessicated rationality; of unconscious, organic growth as over against conscious, artificial construction; of the vitality and integrity of traditional, rooted folk cultures as over against the soullessness and artificiality of cosmopolitan culture – all of these themes were easily transposed from the domain of aesthetics and cultural criticism to that of social philosophy. In the social and political thought of Romanticism, and in the larger and more enduring body of social and political thought permeated by its fundamental categories and values, nations are conceived as historically rooted, organically developed individualities, united by a distinctive *Volksgeist* and by its infinitely ramifying expression in language, custom, law, culture and the state. Despite the emphasis placed on the state,<sup>31</sup> the romantic understanding of nationhood is fundamentally ethnocultural. The *Volksgeist* is constitutive, the state merely expressive of nationhood.

The social and political thought of Romanticism was completely divorced from the realities of practical politics. The Prussian reformers, conversely, were untouched by the incipient ethnocultural nationalism of the period. Awed by French triumph and Prussian collapse, they wished to create a Prussian nation in order to regenerate the Prussian state. Thus Hardenberg wrote to Friedrich Wilhelm III in 1807, ‘We must do from above what the French have done from below’ (Pinson 1966 : 33). Romantics and reformers understood the relation between nation and state in completely different terms: the former in quasi-aesthetic terms, with the state as the expression of the nation and of its constitutive *Volksgeist*, the latter in strictly political terms, with the nation – the mobilised and united *Staatsvolk* – as the deliberate and artificial creation of the state.

Thus was engendered the characteristic dualism and tension between ethnonational and state-national ideologies and programmes – a dualism that has haunted German politics ever since. This suggests a way of reformulating the rough contrast that supplied the point of departure for these reflections: the contrast between the French political and the German ethnocultural conception of nationhood. In fact, traditions of nationhood have political and cultural components in both countries. These components have been closely integrated in France, where political unity has been understood as constitutive, cultural unity as expressive of nationhood. In the German tradition, in contrast, political and ethnocultural aspects of nationhood have stood in tension with one another, serving as the basis for competing conceptions of nationhood. One such conception is sharply opposed to the French conception: on this view, ethnocultural unity is constitutive, political unity expressive of nationhood. While this ethnocultural understanding of



nationhood has never had the field to itself, it took root in early nineteenth century Germany and has remained widely available for political exploitation ever since. No such essentially ethnocultural conception of nationhood has ever taken root in France, where cultural nationhood has been conceived as an ingredient, not a competitor, of political nationhood.

*Nationhood and nationalism in the nineteenth century*

The nineteenth century<sup>32</sup> saw the consolidation of the French and the construction of a German nation-state. By the end of the century, there were noticeable similarities in the social structure and in the political style of the two nation-states. Nonetheless, the deeply rooted differences in the political and cultural construction of nationhood that I have sketched above remained significant, and were in certain respects reinforced.

For a hundred years from the end of the *ancien régime*, France experienced a succession of new regimes, the last of which, during the Boulangist crisis in the centennial year of the Revolution, seemed to be on the verge of collapsing like its predecessors before its twentieth anniversary. Chronic regime instability, however, did not impede the consolidation of the French nation-state from 1830 on. If the Bourbon regime, like the general European settlement imposed by the Congress of Vienna, was anti-national, the July Monarchy was based implicitly, and all subsequent regimes explicitly, on the principle, if not the reality, of the sovereignty of the nation. Yet this formal-constitutional development represents only one aspect of the consolidation of French nation-statehood. More important was the consolidation of national memory effected in the works of historians such as Augustin Thierry, Michelet and Ernest Lavisse; the pedagogic consolidation carried out by the schools of the Third Republic; the linguistic consolidation furthered by school and army; and the socio-geographical consolidation consequent on the development of new means of interlocal communication and transportation (Nora 1986; Weber 1976).

Nationalism, a contradictory mix of chauvinism and messianic humanism, heir to the tradition of revolutionary and Napoleonic expansion and to the principle of national self-determination, was located on the left for most of the century. After the defeat of 1870–1, it migrated to the right, with the Boulangist crisis of 1889 serving as a crucial pivot and the Dreyfus Affair marking its definitive arrival (Rémond 1969 : 208 f.; Girardet 1958). More precisely, Continental nationalism migrated to the right, while the left under Jules Ferry discovered in the 1880s a new field for the projection and reconstruction of national grandeur: a revitalised and expanded overseas empire (Girardet 1978). Ideologically and institutionally, this overseas imperialism was the heir to the Continental imperialism of the Revolutionary and Napoleonic period and, more remotely, to the Roman imperial tradition. Ideologically, it was conceived as a *mission libératrice et civilisatrice*; institutionally, it went much further than its British or German counterparts in the legal and political assimilation of metropolitan and overseas regimes, aiming at the construction of '*la plus grande France*'. French Republicans

pursued an assimilationist, civilising, nationalising mission inside France as well (Weber 1976 : 486f); in the late 1880s, this assimilationist internal nationalism, linked to reforms of primary education and military conscription, formed the backdrop to an expansive, assimilationist reform of citizenship law whose central provisions have endured to this day (Brubaker 1990a : 242–54).

The newly nationalist right, despite its anti-parliamentarism, shared with the old nationalist left (and with the new imperialist left) the sense of a privileged mission or vocation for France, a concern for national 'grandeur', and a reverence for the army as the incarnation and instrument of this grandeur (Girardet 1958). Despite the rise of anti-semitism toward the end of the century, the new nationalism did not abandon the traditional, essentially political, conception of nationhood for an ethnocultural conception.<sup>33</sup> Indeed, the question of Alsace-Lorraine led to the ideological accentuation of the subjectivist-voluntarist components of French as over against the objective-ethnocultural components of German nationhood.<sup>34</sup>

The German ethnocultural conception of nationhood was a product of the distinctive political and cultural geography of central Europe. Yet a feature of that geography – the inextricable intermixture of Germans and other nationalities – made it impossible to found a German state precisely on the ethnocultural nation (Conze 1983 : 95; Lepsius 1985 : 48). None of the proposed solutions to the problem of national unification – including the 'classical' Prussian-*kleindeutsch* and Austrian-*grossdeutsch* solutions – could bring into being a 'perfect' nation-state: either Germans would be excluded, or non-Germans included, or both. Political considerations were dominant both in the programmes of 1848 and in the later practice of Bismarck.

Unification under Bismarck, while conditioned, was not inspired by nationalism, still less by ethnocultural nationalism.<sup>35</sup> Nor was the constitutional structure of the unified Reich that of a nation-state. The Constitution did not invoke popular sovereignty, and the Imperial crown was offered to William I in Versailles by the princes, not by representatives of the people. There was no unified German citizenship: *Reichsangehörigkeit* (citizenship of the Empire) was derivative of *Landesangehörigkeit* (citizenship of the individual constituent states), and its limited political significance reflected the limited political significance of the Reichstag. The French nation-state had been constructed in polemical opposition not only to dynastic sovereignty but also to corporate and provincial privilege.<sup>36</sup> The German quasi-nation state challenged neither principle, even incorporating particular rights – *Reservatrechte* – into the treaties of accession of the South German states.

The Reich was nonetheless understood as a nation-state, both by those who welcomed and by those who feared it.<sup>37</sup> As a nation-state, however, it was imperfect not only in its internal constitution but in its external boundaries – indeed, doubly imperfect. As a *kleindeutsches Reich*, it was under-inclusive, excluding above all millions of Austrian Germans. But it was at the same time over-inclusive, including French in Alsace-Lorraine, Danes in North Schleswig and Poles in Prussia. These were not simply linguistic but rather –



especially in the last case – self-conscious national minorities. In spite of this dual imperfection, the Reich made significant progress toward consolidated nation-statehood between 1871 and 1914 – chiefly through the development of new nationwide institutions and processes and through the integrative working of the state on national consciousness. At the outbreak of war, the Reich was no longer the conspicuously ‘*unvollendete*’ (unfinished) nation-state of 1871 (Schieder 1961; Kocka 1985).

The Reich was heir to secular traditions of Prussian statehood and German nationhood. To a remarkable extent, it succeeded in integrating these differing, even antagonistic traditions. Yet the old dualism survived, the old tension between statist and ethnocultural components in the German tradition of nationhood. In the context of this persisting dualism, two generations were not sufficient to create a consolidated, ‘*selbstverständlich*’, taken-for-granted national consciousness within the frame of the new state. *Reichsnational* did not completely displace *volksnational* consciousness in Imperial Germany: the ethnocultural conception of nationhood, though in recess during the decades after the *Reichsgründung*, remained available for subsequent political exploitation. This is shown by the pan-Germanist agitation around the turn of the century (Arendt 1973 : 222 f.), by the assumption that union with Austria would and should follow the break-up of the Habsburg Empire, and by the development of *völkisch* thought and of a *Deutschtum*-oriented politics during the Weimar Republic – to say nothing of the subsequent exploitation of *völkisch* thought by Nazi propagandists.

#### *Migrants into citizens in late nineteenth-century France*

The vicissitudes of French and German traditions of nationhood in the twentieth century cannot be analysed here. I argue elsewhere that the deeply rooted styles of national self-understanding sketched here survived the turmoil of the first half of the twentieth century, and that they continue to inform the politics of immigration and citizenship today (Brubaker 1990a : Chs. 8 and 9). But the point I want to make here is a historical one. I want to sketch in conclusion the connection between the traditions of nationhood that I have outlined and the legal definitions of citizenship in which they were embodied. For this purpose, it is unnecessary to carry the historical analysis into the twentieth century. For the rules governing the attribution of citizenship in France and Germany were fixed in very nearly their present form in 1889 and 1913 respectively. It is these rules – expansive in France, restrictive in Germany – that govern the citizenship status and chances of today’s immigrants. And parliamentary debates and reports confirm the bearing of distinctive French and German traditions of nationhood on the development of these rules.

Under the 1889 law, French citizenship was attributed to all persons born in France of foreign-born parents and domiciled in France at their majority. This system, with minor modifications, remains in place today. Its effect is to automatically transform second-generation immigrants into citizens, much as happens in classical countries of immigration such as the United States and

Canada.<sup>38</sup> Most commentators have explained the expansiveness of the law by appealing to the demographic and military interests of the French state. They suggest that French demographic stagnation, in the face of German demographic and military robustness, required the civic incorporation of second-generation immigrants. In fact, the civic incorporation of immigrants was not a military necessity (Brubaker 1990a : 237–42). But it did come to be defined as a *political* necessity. It was a response, first, to the ‘shocking inequality’ that exempted even French-born foreigners from military service while Frenchmen had to serve up to five years (CD 3904; C2 : 594b). This exemption was especially galling now that military service had become, in theory if not yet in fact, a personal obligation of every Frenchman. By the mid-1880s, when the reform of citizenship law was being debated, it was evident that the new conscription law then in preparation would move decisively towards universal, although shorter, service. In this context, the exemption of second-generation immigrants was of scant military import; indeed the new conscription law would saddle the military with too many, not too few, recruits. But in the context of universal service for citizens, the exemption of persons born and raised in France, yet choosing to retain their foreign citizenship, was ideologically scandalous and politically intolerable. Secondly, the civic incorporation of second-generation immigrants was a response to the incipient development of ‘different nations within the French nation’ (C2 : 595a). Fears of solidary Italian ethnic communities in Southern France joined fears of ‘foreign’ domination in Algeria, where the French barely outnumbered ‘foreigners’ (e.g. Italians and Spaniards, the vastly larger indigenous population being left out of account). Such solidary ethnic communities, real or imagined, challenged the unitarist French political formula at its core.<sup>39</sup>

But what made the civic incorporation of second-generation immigrants an effective and acceptable solution? Might it not be dangerous, after all, to incorporate immigrants into the army, especially now that military service was conceived in specifically national rather than statist terms, as the expression of the ‘nation in arms’ and no longer as a ‘tribute exacted by an oppressive and alien state’ (Monteilhet 1926 : Ch. 5; Challener 1965; Weber 1976 : 295)? How, moreover, could a formal legal transformation solve the socio-political problem of the nation within the nation? Would not the formal ‘nationalisation’ of the foreign population leave underlying social realities untouched? A stroke of the pen might make foreigners French from the point of view of the law – but would they be truly French?

If parliament was not susceptible to such doubts, if it did not hesitate to transform foreigners into French soldiers and French citizens, it was because of its robust confidence in the assimilatory virtues of France. Thus A. Dubost, reporting on the bill in the *Chambre des Députés*, called for the extension of French nationality to persons who, ‘having lived long on the soil on which they were born, have acquired its mores, habits and character, and are presumed to have a natural attachment for the country of their birth’ (CD 2083 : 232b). Others echoed his sentiments. The assimilationist motif is an old one in France. But there was a new and specifically Republican tinge to the assimilationism of the 1880s. It was not mere residence or work in France that

was credited with assimilatory virtue; it was participation in the newly Republicanised and nationalised institutions of the school and the army. To assimilate means to make similar: and school and army, in their Republican incarnations, entrusted with 'the mission of retempering the French soul' (Azéma and Winock 1976 : 149), were powerfully equipped to do just that. Their assimilatory virtues worked on persons long juridically French, reshaping their habits of thought and feeling to make them fit the wider frame of the nation. But they worked on foreigners and the newly naturalised as well. School attendance was obligatory for foreign and French children alike. And military service, after 1889, would be obligatory not only for old-stock French but for those newly defined as French by the reform of nationality law. Internal and external assimilation were sociologically identical: if school and army could turn peasants into Frenchmen,<sup>40</sup> they could turn native-born foreigners into Frenchmen in the same way.

*Germany: the citizenry as community of descent*

Unlike French citizenship law, German citizenship law assigns no significance to birth in the territory. It thus has no mechanism for automatically transforming second- or even third-generation immigrants into citizens. Citizenship is based solely on descent.<sup>41</sup> When German citizenship law was first formulated, in 1870,<sup>42</sup> it was only natural that citizenship should be based on descent. This was the age of nationalism, and defining the citizenry as a community of descent, following the principle of *jus sanguinis*, was self-evidently preferable to defining the citizenry as a territorial community, following the principle of *jus soli*. *Jus soli* was rejected as a feudal principle that based membership on ties to the soil, *jus sanguinis* preferred as a specifically national principle, which would found the nation on ties of kinship that were more substantial and more enduring than the superficial and external ties of common birth-place (Grawert 1973 : 190-1, 203). There was nothing unusual about this nationalist preference for *jus sanguinis*. Similar arguments were made in France. What is unusual in the German case is that citizenship was based *exclusively* on descent. In most Continental states, the principle of descent is complemented and tempered by the principle of birth-place and/or prolonged residence, so as to encourage or compel second- or third-generation immigrants to join the community of citizens. Few Continental states go as far as France in imposing citizenship automatically on second-generation immigrants. But they do at least make some provision for the civic incorporation of second- and third-generation immigrants. German law makes none.

Why was *jus sanguinis* untempered by *jus soli* in Germany? In some respects the situation in late nineteenth and early twentieth century Germany was like that in late nineteenth-century France. Both countries were experiencing substantial immigration, and in both countries this was a period of heightened nationalism. But the nationalisms were of different kinds. French nationalism of the 1880s, state-centred and confidently assimilationist *vis-à-vis* non-Francophone citizens (Weber 1976 : Chs. 6 and 8) and *vis-à-vis* immigrants,

permitted, even required the transformation of second-generation immigrants into citizens (Brubaker 1990a : 242-54). Turn-of-the-century German nationalism, on the other hand, was ethnoculturally oriented and 'disimilationist' *vis-à-vis* its own ethnically Polish citizens in Eastern Prussia and *vis-à-vis* immigrants, or rather one crucial class of immigrants: Poles and Jews in the Prussian East. That nationalism required the civic exclusion rather than the civic incorporation of these unwanted immigrants (Brubaker 1990a : Ch. 7).

Immigration was an economic necessity in the Eastern provinces of Prussia in the quarter-century preceding the outbreak of the First World War. But the available immigrants – Poles in particular – were undesirable from a national point of view. To a surprising extent, given the traditional distance between Prussian statism and ethnocultural nationalism, the Prussian state had made this point of view its own. The state feared that Polish immigrants would strengthen the ethnically Polish at the expense of the ethnically German element in the Prussian East. A strict naturalisation policy, coupled with an immigration policy requiring migrant workers to leave the country each winter, enabled the state to prevent the settlement of ethnoculturally 'unwanted elements' in its Eastern borderlands. Citizenship served here as an instrument of territorial closure (Brubaker 1990a : 77-81). By excluding immigrants from citizenship, the state retained its freedom of action. This meant, above all, the freedom to expel immigrants from the territory. Today, long-settled immigrants in Western Europe enjoy substantial legal as well as political protection against expulsion. They enjoyed no such protection in the late nineteenth and early twentieth century. In the 1880s, Prussia had expelled 30,000 Polish and Jewish immigrants, many of them long-term residents. There had been no further mass expulsions. But in the absence of restraints on the expulsion of resident non-citizens, citizenship status mattered to the state in a way that it no longer matters today: consequently, the state retained a stronger interest in a restrictive naturalisation policy than it has today. Given the strong westward migratory currents in the German-Slav borderlands of Central Europe, the labour shortages in the Prussian East that compelled the employment of migrant workers, and the cultural and political definition of Slavs and Jews as 'unwanted elements', the state interest in a restrictive naturalisation policy was a compelling one.

Yet if there was a compelling state interest in a restrictive naturalisation policy, there was none in a system of pure *jus sanguinis*. The state had a strong interest in controlling access to citizenship (and therefore to permanent settlement) on the part of recently arrived immigrants. But it had only a highly attenuated interest in preventing the access to citizenship of someone born and raised in the territory. Such persons, in effect, had *already* been allowed to settle in the territory. The state could have prevented their settlement; but it did not. As foreigners, to be sure, such persons would remain vulnerable to future expulsion; the state would retain more leverage over them than over citizens. Having already allowed their settlement, however, the state had very little to gain from this additional leverage.

Like the French extension of *jus soli* in 1889, the German insistence on pure *jus sanguinis* in 1913 must be understood in the context of habits of national

self-understanding that were deeply rooted in the national past and powerfully reinforced at a particular historical conjuncture. In France, the legal transformation of second-generation immigrants into citizens presupposed confidence in their social, cultural, and political transformation into 'real' Frenchmen. The French elite possessed that confidence. Their traditionally assimilationist understanding of nationhood was reinforced by the assimilationist theory and practice of the new national institutions of universal schooling and universal military service. This made the extension of *jus soli* possible and plausible. In Germany, the vehement repudiation of every trace of *jus soli* reflected the lack of elite confidence in the social, cultural, and political transformation of immigrants into Germans. In part, this was the legacy of a traditionally less state-centred and assimilationist, more ethno-cultural understanding of nationhood in Germany than in France. But this was powerfully reinforced in late Bismarckian and Wilhelmine Germany by the increasingly evident failure of attempts to assimilate ethnoculturally Polish German citizens in the Prussian East (Broszat 1972: 143, 157; Blanke 1981: 60; Wehler 1971: 118). Having failed to win the political loyalty of Poles to the German nation-state, and having failed to assimilate them to German language and culture, Prussian-German *Polenpolitik* was increasingly 'dis-similationist', treating ethnically German and ethnically Polish citizens differently in an effort to 'strengthen Germandom' in frontier districts. Since the state had failed to assimilate *indigenous* Poles in the Prussian East, who had been citizens of Prussia since the late eighteenth century, there was no basis for believing that it would succeed in assimilating *immigrant* Poles. An assimilationist citizenship law, like that of France, automatically transforming second-generation immigrants into citizens, was therefore out of the question in Germany.

The French law of 1889 and the German law of 1913 established the principles that govern the attribution of citizenship even today.<sup>43</sup> As a result, a substantial fraction of French post-war immigrants has (or will have) French citizenship, while only a negligible fraction of non-German immigrants to Germany has German citizenship. The French, of course, have not solved all of their problems by formally transforming immigrants into citizens. In many respects, the social, cultural and economic situation of immigrants in the two countries is similar. Yet by transforming second-generation immigrants into citizens, France has formally recognised and guaranteed their permanent membership of state and society, and has granted them full civil, political and social rights. When and whether the new German state will do the same is likely to be an increasingly salient question in the years to come.

### Notes

1. Industrialisation in Europe as elsewhere was accompanied by massive migrations, in many instances across state boundaries. Thus, while no European country is a 'classical' country of immigration, Europe has considerable historical experience with international labour migration, much of it leading to settlement. I have borrowed the expression 'new immigration' – used to describe the surge in Southern and Eastern European immigration to the United States in the late

nineteenth century – to suggest that it is the magnitude and sources, not the mere existence, of immigration that is new in the European setting. A large and increasing proportion of European immigrants stems from Third World countries (often from ex-colonies): the Indian sub-continent and the Caribbean displaced Ireland in the 1960s as the leading source of immigration to Britain; half of the foreign population in France is now from Africa or Asia (mainly from North Africa); and Turks surpassed Italians during the 1970s as the largest group of foreign workers in Germany.

2. This and the next section draw on and amplify material that has appeared in Brubaker 1989b.

3. This schema corresponds in certain respects to T.H. Marshall's (1950: 10f.) distinction of civil, political, and social components of citizenship. The norm of egalitarian membership corresponds to the civil element, that of democratic membership to the political element, and that of socially consequential membership to the social element in Marshall's model. Yet the substantive overlap is only partial. In Marshall's schema nothing corresponds to the norms of sacred, national and unique membership.

This partial correspondence is explained by historical considerations. Marshall analysed the specifically English form of a general European (and later global) process – the development of the civil, political and social rights constitutive of nationwide citizenship. While his analysis was tailored in detail to English peculiarity – and has recently been criticised for its Anglocentrism (Mann 1987) – his basic threefold distinction was modelled on the general European experience; hence the fruitful use of his schema outside the English setting (Bendix 1977; Schmid 1986; Schmitter 1979; Parsons 1965; Turner 1986). Given the integral connection, in Europe and elsewhere, between the development and institutionalisation of civil, political and social rights, and the construction of nation-statehood, the overlap between Marshall's model of citizenship and the model of nation-state membership sketched here should come as no surprise.

Nor should the incompleteness of the overlap. For the construction of citizenship in England, the basis for Marshall's model, took a peculiar form – peculiarity grounded in the geopolitical position of England, in the early coincidence of state authority and national community, in the celebrated gradualism of political development, in a continuous imperial tradition, and in the supra-national character of Great Britain. England may have been the first national state, but France was the first and has remained the paradigmatic nation-state; neither England nor Britain ever became a nation-state *à la française*. The construction of citizenship in England occurred in the context of a taken-for-granted national community and thus was not bound up, as it was on the Continent, with the ideologically charged, contestatory construction of nation-statehood. Norms of membership linked specifically to the contestatory construction of nation-statehood – i.e. the principles of sacredness, uniqueness and nationality – did not figure in the British experience and do not figure in Marshall's model.

For other general discussions of citizenship and membership, see Gallissot 1986; Balibar 1988; Leca 1983; Riedel 1972; Salmond 1901, 1902; Walzer 1983: Ch. 2; 1970; Lochak 1988. And for general discussions of the nation-state with some bearing on questions of citizenship and membership, see Sayad 1984; Zolberg 1981; Young 1976: 70–3; Gellner 1983: 1–7, 53–58.

4. The principle of unitary citizenship, to be sure, far outstripped revolutionary practice, to which distinctions of class and gender were crucial. This does not vitiate the significance of the principle, the central place of which in the myth and mystique of the Revolution helped later to undermine the legitimacy of such distinctions.

5. The Revolution inaugurated a new style of political sacralisation. The nation-state that was invented during the Revolution (and thereafter universalised as a mode of political and social organisation) simultaneously *emancipated* itself from and *incorporated* the sacred. Asserting full autonomy from the sacred as a *transcendent*, external source of legitimation, it nonetheless appropriated religious emotion, transforming sacredness into an *immanent* source of legitimation.

6. To be sure, this cultural community is conceived and constructed differently in France than in Germany or – to take a very different example – in the United States.

7. The requirement of assimilation to the ethnocultural community, of course, is open to widely differing interpretations. The relevant *arenas* of assimilation, as well as the *threshold* of assimilation required in a given arena, may vary considerably.

8. The modern notion of allegiance derives from the feudal notion of liege fealty, meaning

unconditional or absolute fealty. 'There is nothing in feudal theory or practice to prevent a man from having more lords than one. In such a case he owes fealty to both . . . But he can owe *liege* fealty (*ligeantia*) to one only. He can have two lords, but not two liege lords. This was a fundamental maxim of feudalism . . . The fealty which he owes to one of them is not unqualified; it is subject always to the claim of him who is not only his lord, but his liege lord – of him to whom he owes not merely fealty but allegiance. If enmity and war shall arise between two lords, he who is in the faith of each must adhere to him in whose liegeance he is' (Salmond 1902 : 51).

The 'complete elimination of statelessness and dual nationality' was explicitly proclaimed as a goal in the Preamble to the 1930 League of Nations Convention of The Hague. International cooperation has in fact succeeded in reducing the incidence of statelessness. Efforts to curb dual nationality have been much less successful, although the repeated efforts themselves indicate that dual membership remains anomalous.

9. This principle is clearly enunciated by Rousseau. How, he asks rhetorically, can citizens be expected to love their country, 'if their country is no more to them than it is to foreigners, if it grants to citizens only what it can refuse to nobody?' (1755 : 252). The principle takes on special importance, however, only with the development of the welfare state and the proliferation of state-provided benefits that can be withheld from resident non-members. In principle, welfare states are closed systems, presupposing 'boundaries that distinguish those who are members of a community from those who are not' (Freeman 1986 : 52; see also Walzer 1983 : 31). In the theory of the welfare state, these boundaries are drawn between citizens and non-citizens; in practice, however, they are drawn elsewhere (Brubaker 1989d : 155f).

10. For an alternative approach to internal migration as a 'deviance from the prevailing norm of social organization at the world level', a norm expressed in 'the model of society as a territorially based, self-reproducing cultural and political system, whose human population is assumed, tacitly or explicitly, to renew itself endogenously', see Zolberg 1981 : 6. For an overstated yet suggestive argument that immigration contradicts the constitutive categories of the modern social and political world, see Sayad 1984 : 190.

11. On the settlement process, see Piore 1979 : 59ff. On problems of membership, see Walzer 1983 : Ch. 2; Brubaker 1989b : 14–22; Carens 1989.

12. These may include the renunciation of one's previous citizenship; the performance of a sacred act such as an oath of allegiance; the accomplishment of the sacred duty of military service; the manifestation of 'good character', and the more or less complete assimilation to the language and customs of the national community.

13. These include special provisions for spouses of citizens or for citizens of former colonies (Brubaker 1989c : 113–5).

14. Exceptions include Brubaker 1989a; Hammar 1990; Schmitter 1979; Noiriel 1988; de Wenden 1987, 1988. The following paragraphs draw on material that has appeared in Brubaker 1989d : 146–7.

15. Exemplary for a number of reasons – not least because of the comparable magnitude and composition of the immigrant population in the two countries and because of their fateful position at the historic centre of state- and nation-building in Europe.

16. The preamble to the Grundgesetz or Basic Law, in effect the Constitution of the Federal Republic, invokes the 'whole German people' (*das gesamte deutsche Volk*), while Article 116 defines the legal status of 'German' as follows: 'everyone is a German in the eyes of the Grundgesetz . . . who holds German citizenship or who, as a refugee or expellee of German *Volkszugehörigkeit*, or as a spouse or descendant of such a person, has been admitted to the territory of the German Reich as it existed on December 31, 1937'. (The criteria of German *Volkszugehörigkeit* [membership of the German Volk], as specified in the 1953 Law on Expelled Persons and Refugees, include 'descent, speech, upbringing, and culture'.) The Germans thus defined have rights and duties virtually indistinguishable from those of German citizens. And the definition of German citizenship is itself vastly overinclusive, measured against West German territory, for it includes almost all citizens of the German Democratic Republic. There has never been a separate West German citizenship: in its citizenship law, the Federal Republic has always maintained the legal fiction of the continued existence of the German Reich, and thus of a single German citizenship. This insistence on a single German citizenship was central to the exodus of summer and autumn 1989 that set in motion the process of German unification (Brubaker 1990b).

17. By 'immigrants' I mean labour migrants and their descendants, not resettlers from the

German Democratic Republic or ethnic German immigrants from Eastern Europe and the Soviet Union. As one would expect, given the ethnocultural understanding of membership, these *German* immigrants to West Germany are legally defined as citizens (in the case of the East German resettlers) or quasi-citizens (in the case of the ethnic German immigrants from Eastern Europe and the Soviet Union) (Brubaker 1990a : 359–64).

18. It is not simply that France has more liberal naturalisation rules and a political culture of naturalisation that Germany lacks. For French naturalisation rates, despite being four to five times higher than those of the Federal Republic of Germany, are low compared to those of the United States, Canada or Sweden (Brubaker 1989c : 117–20; 1990a : 154–60). More important is the fact that there are, besides naturalisation, other modes of access to French, but not to German, citizenship. Thus French citizenship is attributed at birth to a child born in France if at least one parent was also born in France – including Algeria and other colonies and territories before their independence. This means that the large majority of the roughly 400,000 children born in France since 1963 of Algerian parents are French citizens. Moreover, citizenship is acquired automatically at the age of 18 by *all* children born in France of foreign parents, provided they have resided in France for the last five years and have not been the object of certain criminal condemnations. By this means roughly 250,000 persons have become French since 1973; and of the 1.2 million foreign residents under the age of 18, roughly two-thirds were born in France and are thus programmed to become French at the age of 18. There are no comparable provisions in the Federal Republic of Germany. Thus, while the large majority of the former *Gastarbeiter* and their families were born in the Federal Republic or have lived there for over ten years, only a minute fraction have acquired German citizenship. Of the 1.4 million Turks living in Germany, only about 1,000 are naturalised each year. Even if this number increased tenfold, to 10,000 per year, it would still be more than offset by the 25–30,000 new Turkish citizens born every year in Germany.

19. An earlier version of the next four sections appeared in Brubaker 1989e : 15–27. The comparison of German and French understandings of nationhood and forms of nationalism developed here is, in its basic lines, a traditional one, going back to the early nineteenth century (Brubaker 1990a : 43n.; Kohn 1944, 1967; Rothfels 1956; Schieder 1985; Szücs 1981). Recently, however, bipolar contrasts involving Germany, especially those pointing to a German '*Sonderweg*' (special road) to the modern world, have been subjected to criticism on a broad front. Such accounts, it is argued, measure German developments, minutely scrutinised for faults (in the geological and the moral sense) that might help explain the catastrophe of 1933–45, against an idealised version of 'Western', i.e. British, French or American developments (see especially Blackburn and Eley 1984). Only through the doubly distorting lens of such culpabilisation on the one hand, and idealisation on the other, the argument continues, does the nineteenth century German bourgeoisie appear 'supine' next to its 'heroic' French counterpart, the German party system deeply flawed by English standards, the 'German conception of freedom' dangerously illiberal by comparison with the Anglo-American, German political culture fatally authoritarian in comparison with that of the 'West' in general.

Comparisons of German and French conceptions of nationhood and forms of nationalism have not escaped indictment on this count (Berdahl 1972; Breuilly 1982 : 65–83). To characterise French and German traditions of citizenship and nationhood in terms of such ready-made conceptual pairs as universalism and particularism, cosmopolitanism and ethnocentrism, Enlightenment rationalism and romantic irrationalism, is to pass from characterisation to caricature. My use here of the simplifying opposition between the French political and the German ethnocultural definitions of nationhood is intended as a pointer to, and not a substitute for, a more nuanced analysis. I have tried to recover the analytical and explanatory potency of what remains, after all, an indispensable distinction, by rescuing it from the status of the routine and complacent formula, ripe for criticism, that it had become.

20. A pejorative expression emphasising the fragmentation of political authority in Germany.

21. The word refers to the cultivated middle classes, the bourgeoisie constituted by *Bildung* (education or cultivation), and conscious of its *ständisch* unity.

22. Article 3 of the Declaration of Rights of August 26, 1789 located 'the principle of all sovereignty' in the nation, while the Constitution of 1791 was even more categorical: 'Sovereignty is one [and] indivisible . . . It belongs to the Nation' (Title III, Article 1). The 'nationalisation' of political authority, however, was not limited to the constitutional domain. In effect, 'all that was

"royal" became . . . national: national assembly, national gendarmerie, national guard, national army, national education, . . . national domains, . . . national debt' (Godechot 1971 : 495).

23. 'Il n'y d'étranger en France que les mauvais citoyens' (quoted by Azimi 1988 : 702). While Tallien's remark, as Azimi notes, cannot be taken as representative of the Revolution's attitude toward *étrangers*, it can be taken as illustrative of its strictly political definition of nationhood.

24. As Meinecke notes, the right of national self-determination could be applied to nations understood in a historical-political sense, which may have a strong ethnic component, with the emphasis on the 'historically developed personality of the nation', or in a rational-political sense, with the Nation understood as 'a subdivision of Humanity, an abstractly constructed frame without [distinctive] individual content'. Meinecke registers his clear preference for the former and his criticism of the 'deep weaknesses and errors' of the latter, 'entirely formalistic doctrine of national sovereignty' (1919 : 34). This corresponds roughly to Simmel's (1950 : 81) distinction between the nineteenth-century conception of individuality as *Einzigkeit* (uniqueness) and the eighteenth-century conception of individuality as *Einzelheit* (oneness).

25. Thus Barère's report to the Committee of Public Safety in January 1794: 'Federalism and superstition speak low Breton; emigration and hatred of the Republic speak German; the counterrevolution speaks Italian, and fanaticism speaks Basque'. Only when all citizens speak the same language, according to Abbé Grégoire's 'Rapport sur la nécessité et les moyens d'anéantir les patois et d'universaliser l'usage de la langue française', can all citizens 'communicate their thoughts without hindrance' and enjoy equal access to state offices. Both reports are reprinted in de Certeau et al 1975 : 291-317; the quotations are from pp. 295 and 302.

26. Weber (1976) contains a wealth of material on assimilation, but focuses on the period 1870-1914. On the historical roots of the stronger assimilatory tendency of French than German society, see von Thadden (1987).

27. On September 20, 1792, at Valmy, under fire from the Prussian infantry, the best-trained troops in Europe, the rag-tag French army held its ground to the cry of 'Vive la Nation!' Valmy itself was of no great military significance, but thanks to the celebrated phrase of Goethe, who was present at the battle - 'd'aujourd'hui et de ce lieu date une ère nouvelle dans l'histoire du monde' - the episode has come to symbolise the transformation of war through the appeal to the nation in arms (Furet and Richet 1965 : 175; Soboul 1960 : 58).

28. Godechot concludes that 'it is therefore absurd to speak of French *nationalism* during the first years of the Revolution: *patriotism* is an entirely different thing' (1971 : 498).

29. 'The French nation renounces all wars of conquest, and will never employ her force against the liberty of any people . . . - Foreigners . . . can receive successions from their parents, whether they be foreign or French. - They can make contracts, acquire and receive goods in France, and dispose of them, in the same way as any French citizen . . . Their person, their goods, their industry, their religious observances are also protected by law' (Title VI, Constitution of 1791).

30. The contradictions involved in this missionary nationalism are evident: 'the Grande Nation is not only the nation that, in 1789, triumphed over the monarchy; it is the nation that has triumphed over its internal and external enemies and that will deliver the oppressed patriots of all Europe. . . . The expression Grande Nation applies to the liberating, emancipating nation, the nation that propagates the "great principles" of 1789, the nation that must aid oppressed peoples to conquer their liberty . . . [but also to] the nation that, despite these loudly proclaimed principles, dominates, oppresses, annexes, without regard for the will of other peoples' (Godechot 1971 : 499-500). On the internal nationalism, see Azimi 1988; Nora 1988; Brubaker 1990a : 106-13.

31. The exaltation of the state found in Romantic political thought - Adam Müller's claim, for example, that 'man cannot be imagined outside the state . . . The state is the totality of all human concerns' (quoted by Kohn 1967 : 188) - reflects, on the one hand, an amorphous, globalising conception of the state and, on the other, the teleological notion that the *Volksgeist* can reach its final and perfect expression only in the state.

32. In this context, the 'nineteenth century' means roughly 1830 to 1914 in France, and 1815 to 1914 in Germany.

33. Even the traditionalist 'nationalisme intégrale' of Charles Maurras, it may be argued, turned, despite its anti-semitism, on a political and not on an ethnocultural principle. Anti-semitism, propagated by Edouard Drumont from the mid-1880s on, and uniting anti-capitalist and conservative-Catholic motifs, reached a paroxysmal peak in the Dreyfus Affair. Yet the Affair turned not on an ethnocultural or an ethno-religious conception of nationhood but on the ancient

themes of the place of Church and Army in the life of the nation - themes given a new urgency by the anti-clericalism of the Third Republic and by the emergence of an internationalist and pacifist left.

34. It was the historian Treitschke who most clearly formulated the 'naturalistic', anti-voluntaristic justification for the annexation of Alsace-Lorraine in 1871: 'The German country that we demand is ours by nature and by history. We Germans . . . know what is appropriate for the Alsatians better than these unfortunates themselves. We want to give them their proper being even against their will' (Basdevant 1933 : 90).

The French view was formulated by Fustel de Coulanges, in his letter to the German historian Mommsen on October 27, 1870: 'It is possible that Alsace is German by race and by language, but it is French by nationality and by its sense of fatherland' (Basdevant 1933 : 90). A similar theme was developed by Renan in his polemical letters to Strauss (1870, 1871). Although occasioned by the question of Alsace-Lorraine, the letters - the second letter in particular - offer a remarkably prescient general critique of the dangers of an 'ethnographic politics' that strives to adjust political to fit prior ethnocultural boundaries: 'La division trop accusée de l'humanité en races, outre qu'elle repose sur une erreur scientifique, très peu de pays possédant une race vraiment pure, ne peut mener qu'à des guerres d'extermination, à des guerres 'zoologiques' . . . Vous avez levé dans le monde le drapeau de la politique ethnographique et archéologique en place de la politique libérale; cette politique vous sera fatale. La philologie comparée, que vous avez créée et que vous avez transportée à tort sur le terrain de la politique, vous jouera de mauvais tours. Les Slaves s'y passionnent . . . Comment pouvez-vous croire que les Slaves ne vous feront pas ce que vous faites aux autres . . . Chaque affirmation du germanisme est une affirmation du slavisme; chaque mouvement de concentration de votre part est un mouvement qui "précipite" le Slave, le dégage, le fait être séparément . . . Défiez-vous donc de l'ethnographie, ou plutôt ne l'appliquez pas trop à la politique' (1871 : 456-7).

35. On Bismarck's distance from nationalism, see Schieder 1961 : 22-6. The annexation of Alsace-Lorraine, while demanded and justified in terms of the ethnocultural principle of nationhood, was in fact determined by strategic considerations (Gall 1970).

36. Thus the preamble to the Constitution of 1791: 'Il n'y a plus, pour aucune partie de la Nation, ni pour aucun individu, aucun privilège, ni exception au droit commun de tous les Français'.

37. In the case of Poles in the Prussian East provinces, it was not the Reich, but already the Norddeutsche Bund, that had the ominous character of a nation-state. Poles accepted membership of the non-national Prussian state, but protested against the incorporation of the East Prussian provinces into this newly national entity. In 1871, they renewed their protest: 'we want to remain under Prussian authority, but we do not want to be incorporated into the German Reich' (Polish deputies quoted in Schieder 1961 : 19-20).

38. There are of course important differences between French and North American citizenship law. The North American system is based on unconditional *jus soli*: citizenship is attributed to all persons born in the territory. Thus even children of undocumented immigrants are assigned U.S. citizenship if they are born in the United States. French citizenship law, by contrast, is based on *jus sanguinis*: all persons born of French parents are French citizens, regardless of birth-place. But in addition - and this is where the similarity with North American citizenship law arises - France follows the principle of conditional *jus soli*. As a result, almost all persons born in France and residing there at majority have French citizenship. For details on the French system of conditional *jus soli*, see note 18.

39. Since the Revolution, the self-styled 'nation une et indivisible' has been violently intolerant of anything that could be interpreted as a 'nation within the nation'. This unitarist attitude, at once intolerant of constituted groups and inclusive of their constituent members as individuals, is epitomised by the famous formula of the Comte de Clermont Tonnière during the Revolution: 'One must refuse everything to Jews as a nation and grant everything to Jews as individuals . . . They must be citizens as individuals' (quoted in Schnapper and Leveau 1987 : 3). In the late nineteenth century, similarly, it was felt to be better that established immigrants become individually citizens, than that they remain collectively foreigners, a foreign nation within the French nation, and, as such, a 'true peril' (CD 2083 : 34).

40. Weber (1976 : 494) stresses the 'making similar': As a result of improved communications caused by roads and railroads, a generation of Republican schooling and universal military

service, 'variations in language and behavior were significantly less . . . the regions of France were vastly more alike in 1910 than they had been before Jules Ferry'.

41. Naturalisation is of course possible, but only under severely restrictive conditions (Hailbronner 1989 : 67-70; Brubaker 1989c : 110-1).

42. The 1870 law was enacted for the North German Confederation; it was extended the following year to the German Empire.

43. Policy governing the acquisition of citizenship through naturalisation, to be sure, has varied. In the nineteenth century, it was restrictive in both France and Germany. But naturalisation was decisively liberalised in France during the 1920s, and from that time on, except for the restrictive naturalisation legislation of the Vichy regime, naturalisation has been considerably more liberal in France than in Germany. Although I cannot document this here, debates on naturalisation policy, like the debates on attribution rules sketched in the text, have reflected the differing French and German styles of national self-understanding. So too do current debates about the revision of citizenship law (Brubaker 1990a : Chs. 8, 9).

## References

I. *French Parliamentary Materials*. References are to the *Journal Officiel de la République Française*. References indicate first the document (using the abbreviations given at the left below), secondly the page.

CD 3904. Chambre des Députés, Documents Parlementaires, Session Ordinaire de 1885, Annexe no. 3904. 'Proposition de loi relative à la nationalité des fils d'étrangers nés en France', présentée par M. Maxime Lecomte et al.

CD 2083. Chambre des Députés, Documents Parlementaires, Session Ordinaire de 1887, Annexe no. 2083. 'Rapport fait au nom de la commission chargée d'examiner la proposition de loi, adoptée par le Sénat, sur la nationalité', par M. Antonin Dubost.

C2. Chambre des Députés, Compte Rendu, Séance du 16 mars 1889, 2e délibération sur la proposition de loi, adopté par le Sénat, relative à la nationalité.

## II. Other Sources

- ARENDT, H. 1973. *The Origins of Totalitarianism*. New York: Harcourt Brace Jovanovich.
- AZEMA, J.-P. and WINOCK, M. 1976. *La IIIe République (1870-1940)*. Paris: Calmann-Lévy.
- AZIMI, V. 1988. 'L'étranger sous la Révolution'. *Actes du Colloque d'Orléans, 11-13 Septembre 1986: La Révolution et l'ordre juridique privé: Rationalité ou scandale?*, pp. 699-705. Paris: Presses Universitaires de France.
- BALIBAR, E. 1984. 'Sujets ou citoyens?' *Les temps modernes* 452-453-454 : 1726-53.
- BALIBAR, E. 1988. 'Propositions sur la citoyenneté', in Wenden, C. de (ed.), *La citoyenneté*. Paris: Edilig/Fondation Diderot.
- BASDEVANT, S. 1933. 'Le principe des nationalités dans la doctrine', in Akzin, B. et al., *La nationalité dans la science sociale et dans le droit contemporain*. Paris: Sirey.
- BENDIX, R. 1977. *Nation-Building and Citizenship*. Berkeley: University of California Press.
- BERDAHL, R. 1972. 'New Thoughts on German Nationalism'. *American Historical Review* 77 : 65-80.
- BLACKBOURN, D. and ELEY, G. 1984. *The Peculiarities of German History*. Oxford: Oxford University Press.
- BLANKE, R. 1981. *Prussian Poland in the German Empire*. Boulder: East European Monographs.
- BREUILLY, J. 1982. *Nationalism and the State*. Chicago: University of Chicago Press.
- BROSZAT, M. 1972. *Zweihundert Jahre deutsche Polenpolitik*. Frankfurt: Suhrkamp.
- BRUBAKER, W.R. 1989a. *Immigration and the Politics of Citizenship in Europe and North America*. Lanham, Md.: German Marshall Fund of the United States and University Press of America.
- BRUBAKER, W.R. 1989b. 'Introduction', in Brubaker, W.R. (ed.), *Immigration and the Politics of Citizenship in Europe and North America*, pp. 1-27. Lanham, Md.: German Marshall Fund of the United States and University Press of America.

- BRUBAKER, W.R. 1989c. 'Citizenship and Naturalization: Policies and Politics', in Brubaker, W.R. (ed.), *Immigration and the Politics of Citizenship in Europe and North America*, pp. 99-127. Lanham, Md.: German Marshall Fund of the United States and University Press of America.
- BRUBAKER, W.R. 1989d. 'Membership without Citizenship: the Economic and Social Rights of Non-Citizens', in Brubaker, W.R. (ed.), *Immigration and the Politics of Citizenship in Europe and North America*, pp. 145-61. Lanham, Md.: German Marshall Fund of the United States and University Press of America.
- BRUBAKER, W.R. 1989e. 'Einwanderung und Nationalstaat in Frankreich und Deutschland'. *Der Staat* 28 : 1-30.
- BRUBAKER, W.R. 1990a. 'Citizenship and Nationhood in France and Germany'. Ph.D. dissertation, Columbia University.
- BRUBAKER, W.R. 1990b. 'Frontier Theses: Exit, Voice, and Loyalty in East Germany'. Forthcoming, *Migration World Magazine*.
- CARENS, J. 1989. 'Membership and Morality: Admission to Citizenship in Liberal Democratic States', in Brubaker, W.R. (ed.), *Immigration and the Politics of Citizenship in Europe and North America*, pp. 31-49. Lanham, Md.: German Marshall Fund of the United States and University Press of America.
- Centre de Relations Internationales et de Sciences Politiques d'Amiens and *Revue Pluriel-Débat*. 1984. *La France au Pluriel?* Paris: L'Harmattan.
- CERTEAU, M. de, JULIA, D. and REVEL, J. 1975. *Une politique de la langue. La Révolution française et les patois: L'enquête de Grégoire*. Paris: Gallimard.
- CHALLENGER, R.D. 1965. *The French Theory of the Nation in Arms 1866-1939*. New York: Russell and Russell.
- COMMISSION DE LA NATIONALITE. 1988. *Etre Français aujourd'hui et demain*, 2 vols. Paris: La Documentation Française.
- CONTAMINE, P. 1986. 'Mourir pour la patrie', in Nora, P. (ed.), *La Nation*, Vol. 3. Paris: Gallimard.
- CONZE, W. 1983. 'Nationsbildung durch Trennung', in Pflanze, O. (ed.), *Innenpolitische Probleme des Bismarckreichs*. Munich: Oldenbourg.
- CONZE, W. 1985. '"Deutschland" und "deutsche Nation" als historische Begriffe', in Büsch, O. and Sheehan, J. (eds.), *Die Rolle der Nation in der deutschen Geschichte und Gegenwart*, 95-119. Berlin: Colloquium Verlag.
- COSTA-LASCOUX, J. 1988. 'Intégration et nationalité', in Wenden, C. de (ed.), *La citoyenneté*, pp. 89-121. Paris: Edilig/Fondation Diderot.
- DOORN, J. van 1975. 'The Decline of the Mass Army in the West: General Reflections'. *Armed Forces and Society* 1 : 147-57.
- FREEMAN, G. 1986. 'Migration and the Political Economy of the Welfare State'. *Annals of the American Academy of Political and Social Science* 485 : 51-63.
- FURET, F. and RICHET, D. 1965. *La Révolution française*. Paris: Hachette. (Citations are to the paperback Pluriel edition, which does not give a publication date.)
- GALL, L. 1970. 'Das Problem Elsass-Lothringen', in Schieder, T. and Deuerlein, E. (eds.), *Reichsgründung 1870/71*, pp. 366-85. Stuttgart: Seewald Verlag.
- GALLISSOT, R. 1986. 'Nationalité et citoyenneté: aperçus sur cette contradiction à travers l'évolution du nationalisme français'. *Après-demain* 286 : 8-15.
- GEERTZ, C. 1971. *Islam Observed: Religious Development in Morocco and Indonesia*. Chicago: University of Chicago Press.
- GELLNER, E. 1983. *Nations and Nationalism*. Ithaca, N.Y.: Cornell University Press.
- GIRARDET, R. 1958. 'Pour une introduction à l'histoire du nationalisme français'. *Revue française de science politique* VIII : 505-28.
- GIRARDET, R. 1978. *L'idée coloniale en France de 1871 à 1962*. Paris: Pluriel.
- GODECHOT, J. 1971. 'Nation, patrie, nationalisme et patriotisme en France au XVIIIe siècle'. *Annales historiques de la Révolution française*, No. 206.
- GODECHOT, J. 1983. *La Grande Nation: l'expansion révolutionnaire de la France dans le monde de 1789 à 1799*. Paris: Aubier.
- GRAWERT, R. 1973. *Staat und Staatsangehörigkeit*. Berlin: Duncker und Humblot.
- GRIOTTERAY, A. 1984. *Les immigrés: le choc*. Paris: Plon.



- HAILBRONNER, K. 1989. 'Citizenship and Nationhood in Germany', in Brubaker, W.R. (ed.), *Immigration and the Politics of Citizenship in Europe and North America*. Lanham, Md.: German Marshall Fund and University Press of America.
- HAMMAR, T. 1989. 'State, Nation, and Dual Citizenship', in Brubaker, W.R. (ed.), *Immigration and the Politics of Citizenship in Europe and North America*, pp. 81–96. Lanham, Md.: German Marshall Fund of the United States and University Press of America.
- HAMMAR, T. 1990. *Democracy and the Nation-State: Aliens, Denizens, and Citizens in a World of International Migration*. Aldershot: Avebury.
- KEDOURIE, E. 1985. *Nationalism*. London: Hutchinson.
- KELLY, G.A. 1979. 'Who Needs a Theory of Citizenship?' *Daedalus* Fall: 21–36.
- KOCKA, J. 1985. 'Probleme der politischen Integration der Deutschen, 1867 bis 1945', in Büsch, O. and Sheehan, J. (eds.), *Die Rolle der Nation in der deutschen Geschichte und Gegenwart*. Berlin: Colloquium Verlag.
- KOHN, H. 1944. *The Idea of Nationalism*. New York: Collier.
- KOHN, H. 1967. *Prelude to Nation-States: the French and German Experience, 1789–1815*. Princeton: Van Nostrand.
- LECA, J. 1983. 'Questions sur la citoyenneté'. *Projet* 171–2: 113–25.
- LEPSIUS, M. R. 1985. 'The Nation and Nationalism in Germany'. *Social Research* 52 (1): 43–64.
- LOCHAK, D. 1988. 'Etrangers et citoyens au regard du droit', in Wenden, C. de (ed.), *La citoyenneté*, pp. 73–85. Paris: Edilig/Fondation Diderot.
- MANN, M. 1987. 'Ruling Class Strategies and Citizenship'. *Sociology* 21: 339–54.
- MARSHALL, T.H. 1950. *Citizenship and Social Class and Other Essays*. Cambridge: Cambridge University Press.
- MEINECKE, F. 1919. *Weltbürgertum und Nationalstaat*. Munich: R. Oldenbourg.
- MILLER, M. 1986. 'Policy Ad-Hocracy'. *Annals of the American Academy of Political and Social Science* 485.
- MILLER, M. 1989. 'Political Participation and Representation of Noncitizens', in Brubaker, W.R. (ed.), *Immigration and the Politics of Citizenship in Europe and North America*. Lanham, Md.: German Marshall Fund and University Press of America.
- MINCES, J. 1985. 'Le piège de la société pluriculturelle'. *Esprit* 102: 139–42.
- MONTEILHET, J. 1926. *Les institutions militaires de la France (1814–1924)*. Paris: Librairie Félix Alcan.
- NOIRIEL, G. 1988. *Le creuset français*. Paris: Seuil.
- NORA, P. ed. 1986. *La Nation*, 3 vols. Paris: Gallimard. Part II of *Les lieux de la mémoire*.
- NORA, P. 1988. 'Nation', in Furet, F. and Ozouf, M. (eds.), *Dictionnaire Critique de la Révolution Française*, pp. 801–12. Paris: Flammarion.
- ORIOU, P. 1985. *Les immigrés: mètèques ou citoyens?*. Paris: Syros.
- PARSONS, T. 1965. 'Full Citizenship for the Negro American?' *Daedalus* Fall: 1009–54.
- PINSON, K. 1966. *Modern Germany*. New York: Macmillan.
- PIORE, M. 1979. *Birds of Passage: Migrant Labour and Industrial Societies*. Cambridge: Cambridge University Press.
- REMOND, R. 1969. *The Right Wing in France*. Philadelphia: University of Pennsylvania Press.
- RENAN, E. 1870. 'Lettre à M. Strauss', *Oeuvres complètes*, Vol. 1, pp. 437–48. Paris: Calmann-Lévy (undated).
- RENAN, E. 1871. 'Nouvelle lettre à M. Strauss', *Oeuvres complètes*, Vol. 1, pp. 449–62. Paris: Calmann-Lévy (undated).
- RIEDEL, M. 1972. 'Bürger, Staatsbürger, Bürgertum', in Brunner, O. et al. (eds.), *Geschichtliche Grundbegriffe*, Vol. 1. Stuttgart.
- ROTHFELS, H. 1956. 'Die Nationsidee in westlicher und östlicher Sicht'. *Osteuropa und der deutsche Osten* I (3): 7–18. Cologne-Braunsfeld: Rudolf Müller.
- ROUSSEAU, J.-J. 1962 [1755]. 'De l'économie politique', in Vaughan, C.E. (ed.), *The Political Writings of Jean-Jacques Rousseau*. Oxford: Basil Blackwell.
- SALMOND, J. 1901/1902. 'Citizenship and Allegiance'. *Law Quarterly Review* 17 (1901): 270–82 and 18 (1902): 49–63.
- SAYAD, A. 1982. 'La naturalisation, ses conditions sociales et sa signification chez les immigrés Algériens'. Part II, *Greco 13: Recherches sur les migrations internationales* 4–5: 1–51.
- SAYAD, A. 1984. 'Etat, nation et immigration: l'ordre national à l'épreuve de l'immigration'.

- Peuples méditerranéens* 27–28: 187–205.
- SCHIEDER, T. 1961. *Das deutsche Kaiserreich von 1871 als Nationalstaat*. Cologne: Westdeutscher Verlag.
- SCHIEDER, T. 1985. 'Typologie und Erscheinungsformen des Nationalstaats in Europa', in Winkler, H.A. (ed.), *Nationalismus*, pp. 119–37. Königstein/Ts.: Athenäum.
- SCHMID, C. 1986. 'Social Class, Race, and the Extension of Citizenship: The English Working Class and the Southern Civil Rights Movements'. *Comparative Social Research* 9: 27–46.
- SCHMITTER, B.E. 1979. 'Immigration and Citizenship in West Germany and Switzerland'. Ph.D. thesis, University of Chicago.
- SCHNAPPER, D. and LEVEAU, R. 1987. 'Religion et politique: juifs et musulmans Maghrébins en France'. Paper presented at the conference on 'Les musulmans dans la société française', organised by the Association Française de Science Politique (Paris, January 29–30, 1987).
- SCHUCK, P. 1989. 'Membership in the Liberal Polity: The Devaluation of American Citizenship', in Brubaker, W.R. (ed.), *Immigration and the Politics of Citizenship in Europe and North America*. Lanham, Md.: German Marshall Fund of the United States and University Press of America.
- SCHUCK, P. and SMITH, R. 1985. *Citizenship without Consent: Illegal Aliens in the American Polity*. New Haven: Yale University Press.
- SIMMEL, G. 1950. *The Sociology of Georg Simmel*. Translated, edited, and with an introduction by K.H. Wolff. New York: Free Press.
- SOBOUL, A. 1960. 'De l'Ancien Régime à l'Empire: problème national et réalités sociales'. *L'information historique* 58–64 and 96–104.
- SZÜCS, J. 1981. *Nation und Geschichte*. Budapest: Corvina Kiadó.
- THADDEN, R. von. 1987. 'Umgang mit Minderheiten'. Unpublished paper.
- TURNER, B. 1986. *Citizenship and Capitalism: The Debate over Reformism*. London: Allen and Unwin.
- WALZER, M. 1970a. 'The Obligation to Die for the State', in Walzer, M. (ed.), *Obligations: Essays on Disobedience, War, and Citizenship*, pp. 77–98. Cambridge, Mass.: Harvard University Press.
- WALZER, M. 1970b. 'The Problem of Citizenship', in Walzer, M. (ed.), *Obligations: Essays on Disobedience, War, and Citizenship*, pp. 203–25. Cambridge, Mass.: Harvard University Press.
- WALZER, M. 1983. *Spheres of Justice*. New York: Basic Books.
- WEBER, E. 1976. *Peasants into Frenchmen*. Stanford: Stanford University Press.
- WEHLER, H.-U. 1971. *Sozialdemokratie und Nationalstaat*. Göttingen: Vandenhoeck & Ruprecht.
- WENDEN, C. de. 1987. *Citoyenneté, nationalité et immigration*. Paris: Arcantière.
- WENDEN, C. de. ed. 1988. *La citoyenneté*. Paris: Edilig/Fondation Diderot.
- YOUNG, C. 1976. *The Politics of Cultural Pluralism*. Madison: University of Wisconsin Press.
- ZOLBERG, A. 1981. 'International Migrations in Political Perspective', in Kritz, M. et al. (eds.), *Global Trends in Migration*, pp. 3–27. New York: Center for Migration Studies.
- ZOLBERG, A. 1983. 'Contemporary Transnational Migrations in Historical Perspective', in Kritz, M. (ed.), *U.S. Immigration and Refugee Policy*. Lexington, Mass.: Lexington Books. pp. 15–51.

*Biographical Note:* William Rogers Brubaker is a Junior Fellow in the Society of Fellows of Harvard University. He is the author of *The Limits of Rationality: An Essay on the Social and Moral Thought of Max Weber* and the forthcoming *Citizenship and Nationhood in France and Germany*. He also edited *Immigration and the Politics of Citizenship in Europe and North America*.

*Address:* Society of Fellows, Harvard University, 78 Mt Auburn Street, Cambridge, MA 02138, USA.