

Challenging the Liberal Nation-State?
Postnationalism, Multiculturalism, and the Collective Claims-Making of
Migrants and Ethnic Minorities in Britain and Germany¹

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¹ This study is part of a larger ongoing research project entitled "Mobilization on Ethnic Relations, Citizenship and Immigration" (MERCİ), which focuses not only on the mobilization of migrants and ethnic minorities, but encompasses public claims-making on issues related to immigration, minorities and xenophobia, regardless of the identity of the claims-makers, in five European countries. In addition to Germany and Britain, case studies are in progress for the Netherlands (Thom Duyvené de Wit at the University of Amsterdam) and for France and Switzerland (Marco Giugni and Florence Passy at the University of Geneva). The British data presented in this paper were collected with the assistance of a grant award from the British Economic and Social Research Council (R000236558) in co-operation with the Institute of Communications Studies at the University of Leeds. The German project has been funded from internal resources by the Science Center Berlin (WZB). We would like to thank the editors and several anonymous reviewers of the *American Journal of Sociology*, as well as our colleagues at the Department "Public Sphere and Social Movements" at the WZB for their helpful comments on earlier versions of this paper. Christian Galonska provided valuable assistance with the data analyses.

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ABSTRACT

As important aspects of purported tendencies toward globalization and pluralization, recent immigration waves and the resulting presence of culturally different ethnic minorities are often seen as fundamentally challenging liberal nation-states and traditional models of citizenship. According to this perspective, migrants and ethnic minorities contribute through their claims-making both to the external erosion of sovereignty (the postnational challenge), and to the internal cultural differentiation of liberal nation-states (the multicultural challenge). In contrast, alternative theoretical approaches have emphasized the continuing relevance of the nation-state in the processes of inclusion and exclusion of minorities. From these three perspectives on citizenship (postnational, multicultural, and national) we derive a set of hypotheses and confront these with data on the collective claims-making of migrants and ethnic minorities in two European countries, Britain and Germany, for the period 1990-1995. The data show very little support for the postnational approach, mixed results regarding the multicultural model, and strong support for the continuing relevance of national models of citizenship. We conclude that the nation-state remains the most important reference for migrant claims-making, which rather than fundamentally challenging national modes of migrant incorporation, is made in their image.

INTRODUCTION

If we may believe the current *communis opinio* in political philosophy and sociology, the liberal nation-state as we know it is rapidly becoming an endangered species. While not yet extinct, it is at least in decline or seriously challenged. Two broad processes have been identified as driving this development (Habermas 1996). First, the nation-state's position as the predominant unit of social organization is eroded from the outside by the gathering forces of globalization and the shift of the locus of power from the national to the supra- and transnational levels. Second, the nation state's legitimacy, authority and integrative capacities are also weakened from within by the increasing pluralization of modern societies, while the liberal, universalist values that undergird it are challenged by claims for special group rights (or exemptions from duties) by a multitude of groups emphasizing their cultural difference from the rest of society. The normative evaluation of these--real or supposed--trends differs widely. Some explicitly welcome them as opportunities on the road to a postnational, multicultural utopia, others envisage a nightmare of social disintegration, 'balkanization', and intercultural conflict.

Immigration is invariably seen as one of the main driving forces behind both the external erosion of sovereignty, and the internal cultural differentiation of liberal nation-states. For Western European societies, the presence of growing numbers of racially and culturally different migrants is perhaps the most concrete, tangible, and for some most provocative, way in which globalization and pluralization have become manifest features of modern life. This holds also for the traditional immigration countries such as the United States or Australia, which have only recently become the target of larger flows of non-European immigration. However, in the eyes of many students of migration and race relations, immigration is more than just a highly visible epiphenomenon of globalization and pluralization. Through their collective claims-making, migrants and ethnic minorities are

viewed as important social forces that actively contribute to, and shape these trends.

In this paper, we do not intend to enter into the extensive debates on the normative and philosophical implications of these developments, nor, obviously, do we want to discuss pluralization and globalization in all their facets. Our interest lies with the way in which immigration, and particularly the claims-making of migrants and ethnic minorities of migrant origin, affect, and are shaped by the pluralization and globalization tendencies that supposedly challenge the liberal nation-state.² As the theoretical debate on this topic demonstrates, citizenship--the set of rights, duties, roles, and identities linking citizens to the nation-state--plays a crucial role.³ Three theoretical positions can be identified, two of which are directly linked to globalization and pluralization. First, some authors (Soysal 1994; Jacobson 1996) have argued that the postwar period has seen the rise of new forms of ‘postnational’ citizenship, which have rendered national citizenship increasingly irrelevant, and are based on the transnationalization of migrant communities and the growing role of supranational organizations and conventions, which have strengthened the rights of migrants. A second branch of scholarship sees the increased cultural differentiation of nation-states that results from immigration leading to the development of a ‘multicultural’ citizenship, which gives special rights, recognition and protection to minority groups and their cultures. It is an issue of heated debate in how far such special group rights can be reconciled with the liberal basic

² This implies that regarding ethno-cultural minorities, we limit ourselves to those of migrant origin, and exclude the problematic of so-called “national minorities” such as the Basques, the Quebecois or native Americans. As Kymlicka (1995) has convincingly argued, such minorities pose a rather different, and in many ways much more serious, challenge to the liberal nation-state. For similar reasons, we think our results cannot be extrapolated to the situation of blacks in the United States. As descendants of involuntary migrants and forced laborers, who have suffered centuries of systematic discrimination, the position of Afro-Americans is fundamentally different from the mostly voluntary migrants we deal with here.

³ It is important to note here that citizenship in this sense refers to much more than just the rules for acquisition of nationality. Speaking about citizenship in this narrow sense (denoted in German as *Staatsangehörigkeit*) would not even make sense in the British case for the period up to 1981, since strictly speaking there was no such thing as a British nationality before the implementation of the British Nationality Act. Apart from this formal, legal dimension, our notion of citizenship (similar to the connotation of *Staatsbürgerschaft* in German) includes embedded notions of the duties and rights of citizens that are not necessarily laid down in formal law (such as France’s strong pressures toward cultural assimilation), as well as the more concrete policies of incorporation of immigrants that derive from such formal and informal notions of citizenship (such as Britain’s facilitation of the participation of ethnic minority organizations in the political process in contrast to the marginal role reserved for foreigners’ organizations in Germany).

values of western nation-states (Kymlicka 1995). Parallel to these highly resonant perspectives that emphasize new forms of citizenship that undermine and circumvent traditional models of national citizenship, there is also a booming industry of studies that reaffirm the importance of national models of citizenship and point out important cross-national differences in the modes of inclusion and exclusion of migrants and ethnic minorities (Brubaker 1992; Castles and Miller 1993).

Our aim in this paper is to confront these three models of citizenship with data on the claims-making of migrants and ethnic minorities in two of the most important immigration countries in Europe, Britain and Germany, in the period 1990-1995. Both have large populations of non-European migrants and a significant Muslim community, which makes them relevant cases from the multicultural perspective. As EU members, both countries are exposed to the process of European integration, which is invariably referred to as a paradigmatic example in studies of globalization and postnationalism. However, Britain and Germany have very divergent traditions of national identity and citizenship, which also makes them interesting for comparing the impacts of different national models of citizenship.

In the following theoretical sections we will first present and discuss the three theoretical approaches in more detail. After a brief discussion of the main features of the politics of migration and ethnic relations in Britain and Germany, we derive hypotheses from the three perspectives on citizenship, regarding the public claims-making of migrants and ethnic minorities. We then confront these hypotheses with our data in order to assess the relative merits of the three models and to answer the question whether, the claims-making of migrant minorities does indeed constitute a challenge to the liberal nation-state, and if it does, what the nature of that challenge might be.

THE POSTNATIONAL CHALLENGE

According to theorists of postnational citizenship, "(T)ransnational migration is steadily eroding the traditional basis of nation-state membership, namely citizenship. As rights have come to be predicated on residency, not citizen status, the distinction between 'citizen' and 'alien' has eroded" (Jacobson 1996, pp. 8-9). The primary case in point are the guest workers in Western Europe. Although originally recruited on a temporary basis during the period of labor shortages between the 1950s and early 1970s, the population of guest workers and their descendants in Western Europe has continued to grow even after recruitment was formally terminated in the aftermath of the 1973 oil crisis (e.g., Baldwin-Edwards and Schain 1994). Contrary to the original rotation model, many guest workers became permanent residents and brought over their spouses and children. However, most of them did not become citizens of their new countries of residence. One of the reasons for these low naturalization rates is certainly the fact that these 'denizens' (Hammar 1985) enjoy many of the same civil and social --though not political--rights as full citizens (Bauböck 1994). Postnationalists argue that these rights given to non-citizens derive from the fact that migrants have been able to sustain claims to residence and welfare rights with reference to universal rights of 'personhood', based in international human rights institutions and conventions, which have largely taken over the role of national citizenship as the main source of rights. This has led to a decoupling of the two main elements of citizenship: identity and rights: "Rights increasingly assume universality, legal uniformity, and abstractness, and are defined at the global level. Identities, in contrast, still express particularity and are conceived of as territorially bounded. As an identity, national citizenship still prevails. But in terms of its translation into rights and privileges, it is no longer a significant construction." (Soysal 1998, p. 208).

The collective action of migrants, in this view, plays an active role in the erosion and transcending of the frontiers of nation-states. The growing speed and density of international communication and transport that go with globalization have allowed migrants to maintain strong ties with their homelands. Migrant communities increasingly take on the character of

transnationally linked diasporas that are well equipped for taking advantage of the new opportunities of postnational citizenship (Lie 1995; Shain and Sherman 1998; Jacobson 1996). Speaking about Islamic groups, Soysal (1997, p. 515) observes that "the terms of their participation extend beyond the confines of the national, span multiple localities, connect (and simultaneously construct) transnational communities, and thus, diversify the 'spaces for politics'." In doing so, migrants no longer frame their demands in terms of national conventions and political cultures, but with reference to supranationally encoded rights: "Since the 1970s ... individuals and nonstate entities have increasingly been able to make claims on their own states, and cross-nationally on other states, on the basis of international human rights codes, or instruments" (Jacobson 1996, p. 3). While the demands made by ethnic and religious minorities are often particularistic, they are framed in terms of universalist rights, not least the right to one's own culture and identity (Soysal 1994, 1997). The conclusion Soysal (1998, pp. 210-211) draws from these purported developments leaves no room for doubt, "(I)n a world within which rights, and identities as rights, derive their legitimacy from discourses of universalistic personhood, the limits of nationness, or of national citizenship, for that matter, become inventively irrelevant."

Compelling as this view on postnationalism and the role of migrant minorities may be, it has not gone unchallenged. To begin with, a number of authors have pointed out that the transfer of authority to the supra- and transnational levels has as yet not progressed to a level where it can seriously challenge the nation-state's prerogatives. The process of European integration is often cited as a prime example of the postnationalist erosion of the nation-state, but from a critical examination of the present state of this project Michael Mann (1996, p. 295) concludes that, "Western European weakenings of the nation-state are slight, ad hoc, uneven, and unique." More particularly with regard to the politics of immigration and minority integration, Favell (1998, p. 245) makes a similar point: that common EU policies, or even a mere coordination of the national policies of member states in these fields have thus

far hardly materialized, principally because of the worlds of difference that lie between the different national policy frameworks and philosophies. Indeed those common policies which have been implemented--with the Schengen Accord as the most important example-- hardly rank as the benign human rights type that postnationalists cherish, but are more oriented toward better-coordinated and stricter controls on unwanted immigration.⁴

The practical implications of the many international human and civil rights conventions on the rights of migrants have likewise been questioned. Thus, Goodwin-Gill, Jenny and Perruchoud--representatives, respectively, of the UNHCR and the Intergovernmental Committee for Migration in Geneva--conclude with regard to these treaties and conventions, "Their generality accommodates many shades of opinion, and what really counts is how the scheme of protection is worked out at the local level, particularly with regard to subsidiary rights and procedural guarantees. ... Even under the European Convention on Human Rights the jurisprudence adopted ... and the interpretation of 'civil rights' has sanctioned serious limitations upon non-nationals' entitlement to substantive and procedural due process. Deportation, termination of a residence permit, and the grant or refusal of entry, have all been found by the European Commission not to involve civil rights." (1985, pp. 566-568; see also Forbes 1995, p. 198, p. 207).

However, if these relativizing comments on the influence of the European and international human rights regimes are accurate, how can we explain why Western European governments have given up on their original idea to send guest workers back to their countries of origin once they were no longer needed to make up for labor shortages? And why have they extended many rights, especially those related to the welfare state, to these non-citizens? Christian Joppke has argued that the answer should be sought in domestic legal traditions and

⁴ Of course, with the 1992 Maastricht Treaty, the EU has implemented a form of European citizenship, which although still rudimentary does include complete freedom of movement and residence within the European Union for citizens of member states. However, access to European citizenship is completely dependent on access to citizenship of one of the member states. It therefore does not infringe on the prerogatives of member states to define their own rules of citizenship acquisition, nor does it alter the position of residents holding the citizenship

social pressures. To begin with, individual human rights are not a recent, supranational invention. On the contrary, "the protection of human rights is a constitutive principle of, not an external imposition on, liberal nation-states. The international human rights regime set up after World War II is, after all, the externalization of principles that liberal states have internally long adhered to." (Joppke 1997, p. 261). Not surprisingly therefore, human rights principles and conventions have had little impact on the way in which nonwestern states such as the Persian Gulf states, which lack a domestic human rights tradition, have treated their migrant laborers. In his comparison of asylum politics in Germany, Britain, and the United States, Joppke (1997) further argues that both liberalizations and restrictions in asylum rights have been mainly driven by domestic pressures and domestic pro-immigrant and anti-immigrant coalitions. A similar argument has been made by Freeman (1995, 1998) for immigration politics in general.

The available empirical evidence does not allow us to decide which of these contrasting views on the role of supranational and national contexts for the claims-making of migrants and ethnic minorities is closer to the truth. Against the evidence brought forward for the continuing relevance of the nation-state as a frame of reference for migrant mobilization, postnationalists point to cases where migrants frame their claims in terms of universal human rights and have successfully appealed to supranational courts to prevent or overturn national incursions on their rights (for examples, see Soysal 1994, 1997). However, such evidence remains unsystematic and often does not go much beyond the discussion of a few, supposedly representative, examples.

THE MULTICULTURAL CHALLENGE

Theories on postnationalism are linked in two important ways to multicultural citizenship.

First, postnationalists argue that international conventions providing for a right to one's own culture have greatly improved the opportunities for migrants and ethnic minorities to push for the recognition of their cultural difference by the nation-state. Second, if the postnational observation is correct, that ethnic communities increasingly take the form of transnational diasporas with strong ties to the homeland, then it follows that traditional models to integrate immigrants through assimilation into the majority culture will no longer work (Kymlicka 1995, p. 9).

In the discussion on multiculturalism as a challenge to the liberal nation-state, it is not the nation-state's external sovereignty that is at stake, but its capacity to maintain social cohesion as well as the liberal conception of individual rights on which it rests. Again, the claims-making of ethnic minorities is seen as a central aspect of this challenge: "Minorities and majorities increasingly clash over such issues as language rights, regional autonomy, political representation, education curriculum, land claims, immigration and naturalization policy, even national symbols, such as the choice of national anthem or public holidays. Finding morally defensible and politically viable answers to these issues is the greatest challenge facing democracies today" (Kymlicka 1995, p. 1). Thus, "(W)hat used to be seen as stable liberal democracies are now riven by bitter disputes between ethnocultural groups over immigration and multiculturalism, and some even face the threat of secession" (Kymlicka and Shapiro 1997, p. 3). These problems are seen as arising from the fact that migrant minorities increasingly put forward demands for special group rights and the recognition and support of their cultural difference and identity by the state. Such claims are often seen as challenges to the very essence of liberal values, for instance when Muslims demand the right to polygamy, female circumcision or the banning of Salman Rushdie's *Satanic Verses* (Parekh 1996). In doing so, they challenge the conception of a unified, undifferentiated citizenship, a development which is alternatively viewed as a healthy and necessary antidote against the prevalent 'white' cultural hegemony, or as a serious assault on the shared communal values

and solidarity necessary for social cohesion and integration.

Within the academic debate, Iris Marion Young has been one of the most undiluted advocates of a 'differential citizenship', which moves beyond the classical Marshallian (1950) set of civil, political, and social rights to include group rights for cultural minorities. She argues that in spite of the fact that most people, including ethnic minorities, now enjoy the classical citizenship rights⁵, inequality and discrimination persist as a result of cultural biases in society's institutions, which limit minorities' access to important resources, and their participation in economic and political life. To enable full citizenship, democratic polities should, "provide mechanisms for the effective representation of those of its constituent groups that are oppressed or disadvantaged within it" (Young 1998, pp. 274-275). Such special rights should include public funding for minority organizations, an institutionalized role for such groups in the policy process, as well as a veto right for minorities in questions directly affecting them. Among the 'clear candidates' that qualify for such differential group rights she identifies, "women, blacks, Native Americans, old people, poor people, disabled people, gay men and lesbians, Spanish-speaking Americans, young people, and nonprofessional workers" (Young 1998, p. 279). If these are only the clear candidates, it is perhaps not surprising that such arguments have provoked concerns, sometimes under alarmist labels such as 'balkanization', about the social cohesion of society and the shared understandings, identities, and solidarities necessary for the functioning of democracy (Schlesinger 1992; Glazer 1983). Others, such as Kymlicka (1995) in his seminal contribution to the debate, have tried to steer a middle course between these positions, emphasizing that within certain limits and for specific types of groups differential rights can be incorporated in a liberal framework and may further rather than impede integration.

We will not dwell any further on the normative arguments made by these and many

⁵ Regarding social citizenship rights this is a bold assertion, especially in the American context. From a European perspective, racial conflict in the United States appears not unrelated in a causal sense to a comparatively high level of social inequality and an underdeveloped welfare state.

other participants in the debate, either for or against the granting of differential, multicultural citizenship rights to migrant minorities. Such questions are beyond the scope of this paper. However, it seems to be an issue of consensus that--normatively justifiable or not, disquieting or not--claims for cultural group rights are central to the claims-making of present-day migrants and ethnic minorities. For opponents of further immigration, this is a result of the (too) strong cultural differences of recent, non-European migrants, which strains both migrants' adaptive, and the host society's integrative capacities. From the point of view of proponents of a multicultural citizenship it reflects the fact that the exclusion of unprivileged groups in modern societies is primarily a result of discrimination or biases against these groups' cultural difference, and is no longer--as in the old Marshallian days--primarily a function of socio-economic inequality and a lack of social and political citizenship rights.

Once more, systematic empirical evidence that would allow us to ascertain the relative importance and nature of claims for cultural group rights--both cross-nationally and compared to other types of claims--is hardly available. Unfortunately, the high level of philosophical sophistication in the debate on multiculturalism is not matched on the empirical level. The claim that immigration and ethnic minority mobilization have led to pressures toward a differentiation of citizenship that is serious enough to potentially destabilize the liberal nation-state, at present remains no more than an assertion. The usual references to ethnic strife in Bosnia, Rwanda or the former Soviet Union are quite irrelevant to the context of immigration in western societies. Examples drawn from more relevant contexts are usually anecdotal and extremely repetitive between studies. Open a random book on ethnic minorities and multiculturalism and you have a fair chance of stumbling across the n-th account of the French headscarf (*foulard*) and the British Rushdie affairs. To what extent such spectacular examples are representative for the wider claims-making of migrants and ethnic minorities

remains unclear.⁶

NATIONAL CITIZENSHIP REGIMES FOR INCORPORATING MIGRANTS

Recently, cross-country comparative research has refocused academic attention on the importance of citizenship rights for explaining the different national approaches in liberal democratic states for regulating immigration and the presence of foreign migrants. Not surprisingly with increasing European integration, these debates often see contemporary Western Europe as the empirical testing ground for hypotheses on why countries with ostensibly similar flows of immigration and numbers of immigrants continue to maintain different ways of attributing citizenship rights to non-nationals. An important stimulus to this lively debate on citizenship regimes and the immigration challenge to the nation-state is the work of Rogers Brubaker (1992).⁷

At a time when the rationale of EU integration calls for convergence, Brubaker points out that national regimes for incorporating non-nationals within a system of political and social rights remain, paradoxically, divergent. To explain the endurance of this national variance in citizenship regimes he draws attention to the cultural foundations of nation-states as ties that restrain and bind a community through nationhood. Brubaker's comparison of France and Germany shows that a state's legal definition for citizenship bears a distinct embedded cultural imprint of nationhood. He contrasts the *jus sanguinis* legal tradition for citizenship, where membership is acquired on the basis of ethnic descent, with *jus soli* where it is a territorial birth right. Whereas *jus sanguinis* is resistant to converts by enforcing social

⁶ Moreover, even these examples are not always well chosen. In the French *foulard* case, the overwhelming majority of public debate and attention was not created by the three schoolgirls who wore their headscarves in school, or by the Muslim organizations supporting them, but by French political leaders and intellectuals disagreeing about the nature of French republicanism and laicism.

⁷ There has been a growing body of important comparative research in this field. Other examples include Kleger and D'Amato (1995), Safran (1997), Castles and Miller (1993), Cornelius, Martin and Hollifield (1994), Ireland (1994), and Kastoryano (1996).

closure on the basis of the prescribed collective identity of national ethnicity, *jus soli* citizenship permits a contractual assimilation by an individual to nationhood, either by ritual conversion or automatically by birth. Brubaker's historical study defines Germany as a case of pure *jus sanguinis*, where citizenship rights are still based on ethno-cultural belonging to nationhood. He sees France, on the other hand, as a country where citizenship has crystallised a mixture of *jus sanguinis* and *jus soli*, but where *jus soli* is strongly dominant and encoded in the Jacobin republican civic concept of nationhood.

Importantly, from our perspective, Brubaker argues that these deeply embedded national self-definitions of citizenship continue to shape the divergent political responses of nation-states to migrants up to the present day. He cites the persistently higher naturalization rates in France compared to Germany as empirical evidence that citizenship regimes are the best explanation for the national strategies that the two countries maintain for incorporating migrants.

Extending on Brubaker's analyses, a number of scholars have comparatively analyzed the citizenship configurations of nation-states as the explanatory variable for responses to the challenge of incorporating ethnic difference.⁸ A considerable degree of consensus exists on the 'types' of different citizenship regimes. Typically, these distinguish between two important dimensions of citizenship that can be seen to determine the degree and form of inclusiveness/exclusiveness of a national regime in relation to ethnic difference: firstly, the criteria for formal access to citizenship; and secondly, the cultural obligations that this access to citizenship entails. The first dimension relates to the distinction between an ethno-cultural (*jus sanguinis*) and a civic territorial (*jus soli*) basis of criteria for attributing full citizenship, with the ethno-cultural being the more 'closed' and civic territorial the more 'open' version. The second dimension relates to the distinction between assimilationism and cultural

⁸ Castles (1995), Smith and Blanc (1994) and Favell (1998) are examples of scholars who apply national configurations of citizenship to the incorporation of migrants; whereas Koopmans and Kriesi (1997) apply a similar model by using national citizenship models as 'opportunity structures' for explaining the potential for

pluralism as the condition which a state places on attributing citizenship, with assimilationism being the more ‘demanding’ and cultural pluralism the more ‘accepting’. By combining these dimensions one arrives at three ideal type citizenship regimes that can be related to specific examples of European countries: the ethno-cultural exclusionist; civic assimilationist; and the multi-cultural pluralist.

Within the western European context, the ethno-cultural exclusionist citizenship regime is best approached by Germany. Due to the absence of access to citizenship by territorial birth and relatively high hurdles to naturalization, foreign migrants find it difficult to obtain full citizenship rights and thereby join the national community⁹. In Germany, hundreds of thousands of German-born descendants of migrants are still officially ‘foreigners’ (*Ausländer*) without full political rights. Ethnic German immigrants (*Aussiedler*) newly arriving from Russia, on the other hand, receive full social and political rights on the basis of a hereditary link to the nation. By contrast, France has a civic-assimilationist regime, where the state offers easy access to full rights to migrants, but at the same time is loathe to accept cultural pluralism. In return for rights, migrants are expected to place allegiance to French republican values and political culture above allegiances to religious identity or ethnic belonging. French republicanism is a universalizing secular religion and ethnic collective organization has been officially accepted by the state only since 1981, which places restrictions on the form and strategic orientation of ethnic mobilization. Finally, multi-cultural pluralist citizenship is represented in the European context by Britain, Sweden and the Netherlands. Here the state not only offer easy access to full social and political rights, but

extreme right mobilization--itself a form of ‘ethnic’ mobilization--in different European countries.

⁹ Access to German citizenship has been made somewhat easier by legislative changes in 1990 and 1993. However, even after these changes, Germany continues to have one of the lowest naturalization rates in Europe (see Cinar 1994; Lederer 1997). Recently, however, a proposal by the new government of Social Democrats and Greens has been passed in parliament, which further lowers the barriers to naturalization and introduces a conditional form of *ius soli*, the condition being that children of migrant origin born in Germany have to give up their parent’s nationality when they reach majority age in order to keep their German citizenship. If the new policy is indeed implemented as planned from January 1, 2000 – the right has announced that it will appeal to the Constitutional Court to seek the law’s repeal – this would mean a clear departure from the ethnic citizenship model.

actually sponsors ethnic difference by recognizing immigrant groups as ‘ethnic minorities’ with their own cultural rights and privileges. For example, in the Netherlands, recognized ethnic communities have had the right to set up their own schooling and receive funding from the state.

The key question, of course, is whether these different national traditions have significant consequences for migrants. Brubaker’s answer to this question is lucidly put. According to his formula, citizenship is less a system for attributing rights, and more a contested political field for redefining the symbolic boundary markers for a national identity, “The politics of citizenship today is first and foremost politics of nationhood. ... It pivots more on self-understanding than on self-interest. The ‘interests’ informing the politics of citizenship are ‘ideal’ rather than material. The central question is not ‘who *gets* what?’ but ‘who *is* what?’” (1994, p. 182). Here Brubaker correctly points out the importance of the signification process in structuring the relationship of migrants to the nation-state. This is well demonstrated by the different labels which national policies have applied to migrants: *Ausländer* (foreigners) in Germany; *immigrés* (immigrants) in France; *etnische minderheden* (ethnic minorities) in the Netherlands. However, Brubaker’s emphasis on citizenship as primarily a politics of symbolic interaction obscures the real, material consequences that such ascribed identities may have. The different symbolic labels which nations attribute to migrants directly influence the distribution of material resources to them, and their potential for mobilizing challenges and participating within the political community of a society. It makes a difference whether one is a ‘foreigner’, ‘immigrant’ or ‘ethnic minority’; these are not just symbols but forms of social relationships which legitimate and facilitate certain types of participation in society, whilst de-legitimizing and negatively conditioning others. Similarly, racism and discrimination is not simply the drawing of a symbolic boundary marker, but it is an action which structures the life chances of those affected leading to systemic (and material!) social disadvantage. Incorporating anti-racist and anti-discrimination legislation

into citizenship rights and enforcing them does affect “who *gets* what?”, perhaps more centrally than “who *is* what?”. Contrary to Brubaker, there are important material interests at stake in citizenship rights. The resources of access to the political community – not least of which are voting rights - may indeed make a significant difference in the potential of migrant actors to mobilize and press their claims for social and political change.

However, surprisingly little systematic and comparative empirical work has been done to show how national political contexts impinge upon the collective actions and claims-making of migrants and ethnic minorities (Rex and Drury 1994). One of the very few comparative studies to empirically address the important question of political mobilization is Ireland's (1994) study of forms of political activism by migrants in France and Switzerland. Ireland uses the concept ‘institutional channeling’ for how different national forms of participatory mechanisms - in which citizenship rights are fundamental - shape migrant political activism over time. He finds that similar migrant groups mobilize differently in the two countries, which makes institutional channeling a better explanation for mobilization forms than either ethnic origin or social class.

The perspectives that we have discussed in this section claim that different configurations of citizenship are embedded in national political and civic institutional frameworks, and that these have important consequences both for the incorporation of migrants and for political mobilization over ethnic difference. Before testing the relevance of these claims, it is necessary to give more contextual details on the two countries which our empirical analysis focuses on.

COMPARING BRITAIN AND GERMANY: SIMILARITIES AND DIFFERENCES

Britain and Germany are well suited for testing hypotheses regarding the relevance of citizenship for the political claims-making of migrants and ethnic minorities. Taking the three

different national citizenship regimes that we have discussed, they are opposite cases. Germany is a country with ethno-cultural exclusionist citizenship, where non-ethnic German migrants are incorporated into the labor market, but where it is difficult for them to attain access to the political community. In contrast, Britain's citizenship model tends more towards the multi-cultural pluralist ideal type, where most migrants attain full equal social and political rights, whilst retaining much of their cultural difference from the majority society. To put at least some flesh on the bones of these schematic characterizations, we now look briefly at some contemporary aspects of the respective citizenship regimes, patterns and forms of immigration, as well as different policy approaches for integration.¹⁰

Historically, the countries have experienced broadly comparable patterns of immigration flows. Both sponsored large-scale foreign immigration due to labor shortages from the 1950s until the economic crisis in the early 1970s, when restrictive immigration controls were implemented and maintained. Many of the migrants in Germany came as a result of the 'guest-worker' system for importing foreign labor. This produced an official policy that assumed that these 'guests' would one day return to their homelands, and so policies for integration were minimal. In contrast, many of the migrants to Britain were already subjects of the British Commonwealth and until 1971¹¹ they automatically received equal political and social rights. Since 1965 Race Relations policies in Britain have officially taken measures to combat racism and discrimination and promote social integration, thus acknowledging that political equality has not led to full equal treatment.

In 1995, the percentage of foreign immigrants relative to total population amounted to 8.8 percent in Germany compared to 3.4 percent in Britain. The higher proportion of

¹⁰ Here we offer only a few background details of the country cases to assist interpretation of the data. More substantive contemporary overviews can be found in Layton-Henry (1994), Solomos (1992) and Mason (1995) for Britain; and Bade (1994), Münz, Seifert and Ulrich (1997) and Thränhardt (1992) for Germany.

¹¹ The Immigration Act 1971 and the British Nationality Act 1981 have made 'ancestry' by territorial birth – *patriality* - within Britain a requirement for full citizenship, which in effect prioritizes the access of predominantly white subjects of the Old Commonwealth over the predominantly non-white subjects of the New Commonwealth.

foreigners relative to nationals in Germany compared to Britain, illustrates an important outcome of the different citizenship regimes. In Germany, most second generation migrants are counted as foreigners, as there are higher restrictions placed on naturalization than Britain (between 8 and 15 years residence compared to 5 years), and dual citizenship is not a possibility. Between 1990 and 1995, the proportion of naturalizations per foreign population was higher in Britain than in Germany (between 2.0 and 3.4 per cent per annum, compared to between 0.4 and 0.7 per cent – figures from Sopemi report 1997). Moreover, the *jus sanguinis* restrictions in Germany are aptly demonstrated by the fact that in 1997 the number of ‘foreigners’ increased, despite conditions of negative net immigration – the net gain of new ‘foreigners’ were born in Germany of migrant parentage. As a result of these differences, the percentage of foreigners in Britain grossly underestimates the size of the minority population. In fact, Britain and Germany have similar sizes of minority populations of migrant origin: estimates put the overall migrant population in Britain at about 8 per cent of total population-- 4.5 million total (Castles 1995, p. 300); compared to the 8.8 per cent figure--7 million total-- for Germany in 1995. This, of course, makes them suitable candidates for comparing the impact of citizenship configurations on migrant mobilization.

The countries of origin of the minority populations differ widely in the two countries. Today in Germany, the main ‘foreigner’ groups are from Turkey (more than a third of foreigners), former Yugoslavia (a quarter), Italy, Greece and Poland. In Britain, a large proportion of the ‘ethnic minorities’ are British-born Afro-Caribbeans and Asians, with about three quarters coming from the Indian sub-continent and a quarter the Caribbean. It should be pointed out, however, that both migrant populations contain ethnic and religious groups that may be taken as functional equivalents. For example, both the large Turkish community in Germany, and the Pakistanis and Bangladeshis in Britain--who comprise about a quarter of the minority population--are predominantly Muslims.

Nowadays, immigration to both countries is basically limited to family re-unions and

refugees, asylum-seekers or special cases.¹² An important exception to this rule in Germany are the immigrants of ethnic German origin (*Aussiedler*), who receive automatic full citizenship on arrival, despite their distinct cultural diversity in many cases. In the 1990s, the collapse of Communism in the East has brought new flows of *Aussiedler*, totaling more than two million in the last ten years.

The major difference between the two countries is in the political strategies for integrating minority populations. These incorporation regimes reflect the two different traditions of citizenship to which these countries belong. Parallel to, and partly as a direct result of their exclusion from formal citizenship, migrants and their organizations – as foreigners – play a marginal role in the German political process. In Britain, by contrast, migrant organization and political participation – as ethnic or racial minorities – is facilitated by the state. In the latter country, a state-sponsored ‘race relations’ industry has emerged backed by anti-discrimination legislation and the authority of the Commission for Racial Equality and local bodies to report and advise on practices for ensuring equal treatment, in particular in the labor market.¹³ It is worth emphasizing, that ‘race’ is a category that British political élites adopted when attempting to address the disadvantage of minority populations caused by discrimination. This ‘racialization’ of policy measures in part reflected the fear of political élites that British ‘race riots’ might escalate to the crisis point of those experienced in the United States. An outcome of this is that British policies were more tailored to the integration of Afro-Caribbeans under the generic umbrella term ‘black’, than the relatively later inflows of migrants from the Indian sub-continent, and in particular Pakistan (Rex 1991). The official categorizations of ethnic difference embodied in the last census were: ‘Black’;

¹² With the exception of EU citizens who have the right to free movement and social rights within the Member countries and receive local voting rights too. Other special cases are nationally determined, such as the ‘Aussiedler’ to Germany (see below), and the people of Indian origin resident in Hong Kong who were allowed to enter Britain prior to the end of the colonial rule in 1997.

¹³ For details on the history and implementation of British ‘race relations’, see Solomos (1993), and for a comparison with Germany and the US, see Joppke (1996).

‘Asian’ and ‘Chinese and Other’.¹⁴ This shows that race relations politics has been extended to Indians, Pakistanis and Bangladeshis under the generic term ‘Asian’, which implies that groups with a self-identification that is non-racial, the prime example being groups with a Muslim identity, have been served relatively less well by the institutional apparatus (Modood 1997).

Another point worth making about the British case, is that the constituency-based electoral system has provided the large concentrations of minority communities in specific towns and regions with a considerable resource-base of voting power for influencing individual Members of Parliament, and has in turn led political parties to take up issues relating to ethnic minorities. At the local level of politics, minorities have also made a considerable impact in specific regions (e.g., Solomos and Back 1994).

By contrast, Germany has maintained a different policy approach where migrants are excluded from political participation. Apart from the powerless and marginal foreigners’ councils (*Ausländerbeiräte*) on the local level, foreigners in Germany have no institutionalized channels of access to the political process. The German state does not provide the kind of facilitation to migrant organizations that many of their British counterparts receive. There is no institutional focus for minority claims in the form of an official minority, racial equality, or anti-discrimination politics, which might legitimate migrant demands and identify responsible authorities for their implementation. The official mantra that ‘Germany is not an immigration country’ therefore has real consequences for the opportunities for minority claims-making.

DATA RETRIEVAL

To investigate the public claims-making of migrants and ethnic minorities in Britain and

¹⁴ Each of these three macro categories was subdivided into three categories, giving in total a choice of nine

Germany, we use data drawn from content analyses of daily newspapers in the two countries. In contrast to many media content analyses, we are not primarily interested in the way in which the media frame events. On the contrary, our focus is on the news coverage of mobilization, public statements and other forms of claims-making by non-media actors. Taking a cue from ‘protest event analysis’ in the study of social movements (Tarrow 1989; Olzak 1989; Rucht, Koopmans, and Neidhardt 1998), our units of analysis are not articles, but individual instances of claims-making. Although we focus here on claims-making by migrant minorities, our larger data set includes the whole spectrum of claims-making acts related to immigration, minority integration, and xenophobia, irrespective of the actors involved. This includes civil society groups such as antiracist and human rights organizations or labor unions, but also political parties and state actors, including the police, courts, legislatures, local and national governments and supranational institutions. Instances of claims-making have been included irrespective of their form, and range from violent attacks on other groups, public demonstrations and legal action, to public statements.

Acts were included in the data if they involved demands, criticisms, or proposals related to the regulation or evaluation of immigration, minority integration, or xenophobia. Because of our special interest in minority claims-making, we included acts by resident ethnic minorities even if they were not related to these issues--provided, of course, that they involved some political claim--which in particular allowed us to include the claims-making of migrants related to the politics of their homelands.¹⁵ Regarding territorial criteria we included acts in Britain¹⁶ and Germany, respectively, even if they were made by foreign actors or

options.

¹⁵ This excludes acts of international terrorism that could not be plausibly interpreted as part of the claims-making of a particular resident ethnic community, for instance, most forms of Middle Eastern terrorism. Acts by terrorist groups were included, however, if they were significantly linked to a resident ethnic community, e.g., the Kurdish PKK in Germany, or the planting of a car bomb by Islamic fundamentalists outside the Israeli embassy in Britain.

¹⁶ Britain here does not refer to the whole of the United Kingdom, but to the main island; events in Northern Ireland were excluded. Moreover, because Scotland has its own press, our data include few Scottish events. If we talk about Britain, therefore, we are in fact mainly implying England and Wales--which is where more than ninety percent of the total population and an even larger percentage of ethnic minorities in the UK live.

addressed to foreign or supranational authorities, and also acts made outside Britain or Germany, but addressed to actors in these countries.¹⁷ Both types of acts were considered to be claims in the British or German public spheres.¹⁸

For the comparative analysis here, we use data drawn from every second issue (Monday, Wednesday, Friday) of *The Guardian* for Britain and the *Frankfurter Rundschau* for Germany for the six-year period from 1990 to 1995.¹⁹ These papers were chosen because they are of a comparable, moderately left-liberal political affiliation, and because, compared to other national quality newspapers, they have the most encompassing coverage of the specific issues of interest. Of course, when using newspapers as a source one has to deal with the problem of selection--not all events that occur receive coverage--and description bias--

¹⁷ E.g., an open letter by the American Jewish Committee addressed to Chancellor Kohl expressing concern about xenophobia in Germany, or the claim by a Nigerian government official that the Omibiyo Family Anti-Deportation Campaign was damaging his country's national image in Britain.

¹⁸ One may object that our focus on *national* public spheres introduces a bias in our results to the detriment of trans- and supranational actors. This would be true if there was such a thing as an *international* or *European* public sphere. In the absence of supranational media or transnational public debates of any importance, the public claims-making of supranational actors (or claims-making addressed to supranational actors) has to be mediated through national public spheres in order to be effective. At present the modest beginnings of an international public sphere in the form of television networks such as CNN, or newspapers such as the now defunct *European*, cannot compete in terms of audience or resonance with national media, not least because of the language factor, which may well prove to be an insurmountable barrier to the development of a transnational public sphere.

¹⁹ Data were coded from microfilm (Germany) and CD-ROM (Britain) versions of the newspapers by trained coding assistants on the basis of a standardized codebook. All articles in the home news section of the newspapers were checked for relevant acts, i.e. the search was not limited to articles containing certain key words. For the main variables in the analysis (actors, addressees, aims, etc.) open category lists were used, which allow us to retain the detail of the original reports in the analysis. In addition, hard copies of the original articles were kept to allow us to go back to the original reports if information was needed that had not been captured by the variables and categories included in the codebook (codebooks are available from the authors on request). The use of very detailed open category systems including hundreds of different actors and claims entails that conventional measures of intercoder reliability are not applicable to these variables. Anyway, the categorizations used in the present analyses are not based on coder decisions, but are the result of aggregations of raw codes by the authors (for a similar two-stage procedure of content analysis, see Shapiro and Markoff 1998, pp. 73ff., 199ff). Conventional reliability measures are, however, applicable to one important aspect of the coding process, namely the inclusion or exclusion of articles and claims from the newspaper source (we report results for intercoder reliability tests based only on the German case, since the British data were collected by one single coder and thus intercoder reliability is irrelevant here). In a first step, coders have to decide which newspaper articles contain any codeable claims at all. This is a crucial step in the coding process, because only these articles will be archived, and going back to the original source material for checks, corrections and refinements will not be possible for any articles that are excluded at this stage. Comparing six coders regarding their inclusion or exclusion of articles, a reliability coefficient (Cronbach's alpha) of .94 was achieved. In a second step, coders have to identify claims, the final unit of analysis, in the selected articles. Often, articles contain several codeable claims, which have to be identified and delimited from each other. This increases divergences among coders so that in the final instance we arrived at a reliability coefficient of .89 in our test. Unlike the lost information in the first step, coder unreliability in this second step of the coding process is repairable. For the present analyses, for instance, we have checked many of the original source articles in order to

events may get covered in a distorted way (McCarthy et al. 1996). We have tried to minimize the problem of description bias by explicitly basing the coding only on the factual coverage of statements and events in newspaper articles, and leaving out any comments and evaluations made by reporters or editors. In any case, quality newspapers have to protect their reputation and cannot afford to quote claims patently incorrectly. Since our interest here lies with *public* claims-making, the problem of selection bias is less aggravating here than in some other contexts, because acts of claims-making become relevant--and potentially controversial--only when they reach the public sphere.

However, it may be that our sources have specific biases that make the data drawn from them unrepresentative for the print-media landscape at large. To check for such biases, we have in each of the two countries drawn additional samples from other newspaper sources. In Germany, we coded two years of the right-wing tabloid *Bild Zeitung*, one year of the German-published edition of the Turkish daily *Hürriyet*, as well as four-month samples from three different local dailies. In Britain we have a cross-section of six national newspapers for the year 1995.²⁰ Comparisons among these sources confirm that our two main sources give relatively broad coverage to issues of immigration and ethnic relations. Importantly, the sometimes large differences in coverage *rates* do not lead to very different *distributions* of acts on important variables. As an example we may take the *Frankfurter Rundschau* and *Bild*, which occupy diametrically opposed positions in the German print media landscape, on both the left-right, and quality-tabloid dimensions. The number of reported claims in the domain of immigration and ethnic relations turns out to be 4.6 times higher in the *Rundschau* than in *Bild*. However, distributions across different issues (asylum, integration, antiracism, etc.) hardly differ among the two papers, and neither does the representation of different actors in

improve our qualitative understanding of minority claims-making. In the process, we have found some coding errors and have been able to correct them.

²⁰ Apart from *The Guardian*, these were the *The Times*, *The Daily Express*, *The Daily Mirror*, *The Sun*, and *The Daily Mail*.

the coverage.²¹ In as far as minor differences exist, they run in a direction that is helpful rather than harmful for our purposes. Thus, *Bild* has a somewhat stronger focus on national actors to the detriment of regional and local ones, and a somewhat weaker coverage of acts by minority actors (4.5% versus 6.8% for the *Rundschau*). Our main source thus is somewhat less selective when it comes to covering the claims-making of more marginal actors.

These similarities and minor differences co-exist with large differences in the evaluation of events, as is revealed by a comparison of editorials in both papers. Taking the issue of asylum, seven out of ten *Bild* editorials favored restrictions in the rights of asylum seekers, while seven out of ten *Rundschau* editorials *opposed* such restrictions. However different these newspapers' political stances may have been, they had marginal effects on coverage. Out of 10 statements by other actors reported in *Bild* an average of 5.6 were in favor of restrictions, against 4.8 for the *Rundschau*. We may conclude, therefore, that our strategy of focussing on factual coverage and ignoring newspapers' framing and commenting of events reduces biases that may effect the variables we are interested in to such an extent that we can safely conclude that our main sources give a representative picture of public claims-making on immigration and ethnic relations.²²

HYPOTHESES

²¹ This becomes very clear if we compare actors with known political party affiliation. The distribution is strikingly similar in both papers, and, interestingly, closely matches the electoral strength of each of the parties.

²² A comparison of the *Rundschau* to the *Hürriyet* for the year 1995 produces similar results. As a mainstream newspaper with a readership drawn mainly from the majority culture the *Rundschau* of course does not cover claims-making by ethnic minorities to the same extent as the *Hürriyet*, which caters specifically to the Turkish immigrant community. Indeed, the number of ethnic minority claims reported was about three times higher in the *Hürriyet*, with, of course, a heavy bias toward claims-making by Turkish and Kurdish groups. Again, however, this difference in the quantity of coverage hardly affects the distributions among types of claims. As we will see further on, the most striking characteristic of German minority claims-making is the predominance of homeland-related claims. The comparison with the *Hürriyet* shows that this result is not the product of a construction by German mainstream media, who would ignore claims-making by minorities for rights in Germany and focus disproportionally on conflicts imported from migrants' homelands. For the year 1995, the percentages of homeland-related claims in the two newspapers are very close: 67% in the *Rundschau* and 60% in the *Hürriyet*. Information on similar checks for biases in the British case, or for the comparison of national and local newspapers are available from the authors on request.

In the remainder of this paper, we will use our data on migrant and ethnic minority claims-making to test the validity of the three theoretical views on the link between citizenship and migration. Although these perspectives are not as such theories of ethnic mobilization, minority claims-making figures centrally in theories of postnational and multicultural citizenship, both as a cause, and as a consequence of shifts in the nature of citizenship away from the traditional unitary form of national citizenship. While the national citizenship model discusses ethnic mobilization less centrally, it also implies clear expectations about the nature of, and cross-national differences and similarities in ethnic minority claims-making. Thus, each of the three theoretical configurations of citizenship is associated with a particular pattern of minority claims-making.

As we have seen, migrants and ethnic minorities are seen by those who proclaim the advance of a postnationalist or multicultural citizenship as actors who, through their claims-making, make important contributions to these trends. Thus a high level of "postnational" or "multicultural" claims-making by migrants and minorities may be regarded as direct supportive evidence for these models. As indicators of postnational claims-making we will look at the prevalence of transnational collective identities and organizations, the degree to which claims are addressed at authorities beyond the nation-state, and the extent to which the substance of minority claims refers to supra- or transnational institutions and conventions. As indicators of multicultural claims-making we regard the degree to which minorities collectively identify themselves along cultural (particularly religious) lines and the extent to which their claims-making focuses on extensions of cultural rights.

Second, the three modes of citizenship can also be seen as political opportunity structures (McAdam 1982; Tarrow 1994; Kriesi et al. 1995) that shape the mobilization of migrants and minorities, by facilitating some, and constraining other forms of claims-making. Thus, the increased institutionalization of postnational and multicultural institutions, rights

and discourses implies increased opportunities for migrants and minorities for advancing postnational and multicultural claims of the kind indicated above. On the contrary, the national citizenship model implies that migrant and minority claims-making will be strongly affected by the opportunities and constraints for intervening in the public sphere set by the institutions, rights and discourses that derive from nationally specific modes of incorporation of migrants into the political community through citizenship. From these general expectations, we can draw a number of concrete hypotheses relating to specific aspects of migrant and ethnic minority claims-making:

(1) At the most general level, the national citizenship model leads us to expect important *differences* in patterns of claims-making of migrant minorities between Germany and Britain as a result of the different ways in which migrants and minorities are incorporated into, or excluded from the nation-state. The postnational citizenship model, by contrast, leads us to expect *similarities* among the two countries because of the fact that migrants' claims-making increasingly depends on the opportunities provided by universal human rights, which are defined and encoded at the supranational level and thus are not fundamentally different for minorities in Britain or in Germany. Although theories of multicultural citizenship are less explicit in this regard, they also lead us to expect cross-national similarities rather than differences. The affirmation of cultural difference by ethnic minorities and the concomitant rise of claims to differential citizenship rights are seen as general trends affecting modern western societies in general.²³

With regard to the *type of minority actors involved in claims-making*, we can distinguish two dimensions that are of theoretical relevance here: (2.1) the kind of collective identities they mobilize, and (2.2) the territorial scope of their organizations.

²³ Significant cross-national variation could result, in this view, from differences in the composition of the migrant population, leading to different degrees of cultural difference between minorities and the majority society. However, since Britain and Germany have comparable numbers of non-European and Muslim

(2.1) The first actor dimension refers to *collective identities*. The kind of collective identities that migrant minorities put forward in their claims-making are not self-evident, but signify specific constructions of the group's image of itself and its relation to the wider society, including other migrant groups. Moreover, identities and labels may be strategically used in such a way that the impact and legitimacy of claims is optimized. Since the multicultural model sees cultural difference as the primary source of minority claims-making, we would expect cultural and religious forms of identification to dominate. The national citizenship model would again expect different outcomes in different national contexts, depending on which collective identities are sponsored and excluded, respectively, by the national model of migrant incorporation. In the British context, this leads to the expectation that migrants will primarily make claims on the basis of identification with one of the two officially recognized racial groups, 'blacks' and 'Asians'. To a lesser extent, British multiculturalism may also further claims-making on a cultural or religious basis. Homeland-based forms of identification should be relatively rare in Britain, though. In Germany, however, we would expect the collective identities of 'foreigners' to precisely match homeland-based categories, either nationality (e.g., the Turkish Community in Berlin²⁴), homeland-based political affiliation (e.g. the Turkish Communist Party), or homeland-based ethnic cleavages (e.g., Kurdish nationalist groups).

(2.2) Regarding the *territorial scope of migrant organizations*, postnationalism theories, which emphasize the transnationalization of ethnic communities, predict a significant involvement of actors that transcend the national context. These may be either international (e.g., the World Council of Roma and Sinti), Europe-wide (e.g., the European Association of Turkish Academics), homeland-based (e.g., the National Resistance Council of Iran)²⁵ or otherwise foreign-based (e.g., the American Jewish Committee). The national

minorities, we should not find large differences between these two countries.

²⁴ All examples of organizations and claims given in this and the following section were drawn from our data.

²⁵ As this example indicates, our definition of homeland-based includes exile organizations of opponents to the

citizenship model, by contrast, does not see an important role for transnational actors. The involvement of homeland-based actors, however, would depend on the kind of national citizenship regime. In countries such as Germany, where immigrants continue to be defined as ‘foreigners’ and have few opportunities to participate in German political life, we might expect migrants to remain strongly tied to their homelands, which might in turn strengthen the position of homeland-based organizations. In more inclusive countries such as Britain, where most migrants are citizens and the state sponsors migrant and minority organizations that operate within the British political process, we might expect homeland-based organizations to play a relatively modest role.

(3) With regard to the *addressees of claims*²⁶, we can formulate hypotheses similar to those for the territorial scope of migrant organizations. Once more, the postnational model leads us to expect that to an important extent migrant minorities direct their claims at authorities that transcend national borders. These may be either international (e.g., the United Nations High Commission for Refugees, UNHCR), European (e.g., the European Parliament), or represent a foreign state (e.g., the Turkish government). By contrast, from the national citizenship model we may draw the expectation that political authorities within the national polity are the most important addressees of claims. In Germany we may in addition expect a significant number of claims addressed at the authorities of migrants’ homelands, linked to the persistence of homeland-based organizations and collective identities discussed above.

Regarding the *content of claims* made by migrants and ethnic minorities, we ask a number of different questions. First, we look at the relative importance of migrant claims-making on immigration and ethnic relations compared to (4.1) migrant claims-making on homeland issues, and (4.2) all claims-making on immigration and ethnic relations.

(4.1) Regarding the relation between migrants’ *claims-making on issues related to the*

homeland regime.

²⁶ By the term ‘addressee’ we refer to the authorities at whom minorities direct their demands, policy proposals, or criticisms. In other words, the addressee is the political actor that is called upon to act on behalf of the claim-

countries of residence and of origin, respectively, the national citizenship model allows us to derive a clear expectation. We might expect the importance of homeland-related issues to depend on the degree to which migrants are symbolically included in the national political community, and materially incorporated into the political process of their countries of residence. Thus, we expect a stronger emphasis on homeland issues in Germany, and a stronger orientation toward issues relating to integration into the host society in Britain. We shall interpret a strong and relatively similar representation of homeland issues in both countries as support for the postnational model. It is plausible to expect that the transnationalization of ethnic communities also leads them to retain a substantive interest in the politics of their homeland countries.

(4.2) Regarding the *contribution of migrants to the overall claims-making on immigration and ethnic relations*, both the postnational and multicultural model hypothesize a relatively important role for migrants and ethnic minorities. After all, their claims-making is supposed to be an active force in the emergence of new, postnational or multicultural, forms of citizenship that challenge the liberal nation-state. The national citizenship model would again say that it depends on the national context. In inclusive countries such as Britain, where minorities are citizens and their involvement in the political process is facilitated by the state, migrant and minority claims-making might be expected to be relatively important. Where migrants lack political rights and the state does not facilitate migrants' political organization and incorporation into the policy process, as in Germany, migrants might be expected to remain relatively marginal actors.

Finally, we look at migrants' claims on immigration and ethnic relations in more detail. We first ask the question to what extent these claims are (4.3) framed with reference to supra- and transnational, or national institutions, rights and conventions. Second (4.4), we look at the type of demands, and particularly at the nature and relative importance of demands

for cultural group rights.

(4.3) With regard to the *territorial scope of claims*, we can draw a clear hypothesis from the postnational model. According to this perspective, the relativization of the nation-state occurs not only because foreign, transnational, and supranational actors intervene in national politics (hypothesis 2.2) and actors in the national polity directly address supranational or foreign authorities (hypothesis 3). At least as important as these direct forms of ‘postnationalization’ is the indirect form in which actors make claims on national authorities by referring to supranational institutions, conventions and legislation. The postnational model predicts that such claims play an important role, while the national citizenship model would expect them to be relatively marginal compared to claims whose frame of reference remains within the national context.

(4.4) Finally, we look at the type of demands that minorities make with regard to immigration and ethnic relations. Here only theories of multicultural citizenship allow us to formulate clear expectations. According to this perspective, demands for special group rights related to the recognition and protection of cultural differences are central to the claims-making of ethnic minorities. The national citizenship model does not allow us to say much about the relative importance of such claims compared to other types of claims. However, they may be expected to play a more important role in Britain than in Germany, because the former country officially sees itself as a ‘multicultural society’ with tolerance for cultural diversity as one of its constituent principles. Thus, opportunities for claims-making on the basis of cultural difference would seem to be more favorable in Britain than in Germany.

FINDINGS

Starting with the type of actors involved in minority claims-making, Table 1 gives an overview of the type of collective identities that were expressed in claims-making by ethnic

minorities and migrants (Hypothesis 2.1). We distinguish four broad types of identities. First, migrants and minorities may identify themselves across ethnic and cultural boundaries on the basis of their common status as ‘immigrants’, (ethnic) ‘minorities’, or ‘foreigners’. More specific status group identifications include asylum seekers or the ethnic German immigrant category of ‘*Aussiedler*’. Second, minorities may identify, or be identified with a certain racial group, such as ‘blacks’ or ‘Asians’. As a powerful cultural marker, religion can be a third possible basis for migrant and minority claims-making. Finally, migrants may identify themselves on the basis of their common national or ethnic descent. It is well worth noting that these possible types of identification overlap and are to an important degree in competition with each other. Whether immigrants from Bangladesh identify themselves as ‘immigrants’, as ‘Bangladeshi’, as ‘Muslims’, as ‘Asians’, or as ‘blacks’ is a political outcome that may give us important information on the nature of the relation between immigrants and the nation-state. As we have indicated in Hypothesis 2.1, the multicultural model leads us to expect identification on the basis of cultural difference, whereas the national citizenship model predicts identification on the basis of national or ethnic origin in Germany, and on the basis of racial and cultural groups in Britain.

If we look first at the first and third columns of Table 1, we see that indeed identification with national or ethnic groups is much more frequent in Germany (83%) than in Britain (19%). Interestingly, apart from some claims-making by Jewish religious groups, we find almost no claims-making on a religious basis in Germany.²⁷ For a country with a Muslim population of several millions it is particularly striking that there were very few (0.4%, i.e., 3 cases) instances of claims-making by Muslim or Islamic groups. While Muslim minorities in

²⁷ In the case of Jews and Sikhs it is often difficult to tell whether the label used refers to ethnicity or to religion. Both in English, and in German the same word “Jewish” (*jüdisch*) is used to denote Jews both as a religious, and as an ethnic group. We have used the religious group category only if the name of an organization indicated a religious basis (e.g., Synagogal Society Adass-Jisrael), while the ethnic category was used otherwise (e.g., the Central Council of Jews in Germany—a secular organization that was responsible for the large majority of claims by Jews in Germany). This problem may have caused a minor underestimation of the religious component in the mobilization of Jews (for Sikhs we have only three cases, anyway, so the question does not have much practical relevance).

Germany enter the public sphere as ‘Turks’, ‘Kurds’, ‘Bosnians’, or ‘Iranians’, rather than as ‘Muslims’ we find the exact reverse pattern in Britain. While 24% of claims-making originated in Muslim groups, only 1% and 4%, respectively, were made under the label of the two national groups, Pakistani and Bangladeshi, to which most British Muslims belong.

We find a similarly striking difference between Germany and Britain regarding the prominence of racial groups in the claims-making. For obvious historical reasons related to the race politics of the Nazi period, ‘race’ has never gained currency in the postwar German political discourse and has no place in the state’s aliens politics.²⁸ By contrast, race is a legitimate and regularly used basis for claims-making in Britain, where 26% of claims originated in ‘black’ and another 9% in ‘Asian’ groups.²⁹

An important objection that may be raised against these findings is that because they are based on media data they are likely to measure the ascription of identities by the majority society, which, interesting as it may be, is not necessarily the same as the self-identification of migrants and ethnic minorities. We therefore also present a second measure of collective identities (displayed in the second and fourth columns of Table 1) which is based on the subsample of cases for which we had information on the full name of the organization that made the claim. This excludes cases where the newspaper only gave a vague identification of the claim-makers (e.g., ‘Turkish groups’ demonstrating against racism), which leave relatively much room for the ascription of identities by journalists. Names of organizations, by contrast, are important vehicles for the self-presentation of groups toward both their constituency, and the wider society, and therefore may be considered good indicators of the group’s collective identity. For the German case, this different method does not lead to important changes.

²⁸ Even racism is usually not referred to in Germany as such, but as ‘hostility against foreigners’ (*Ausländerfeindlichkeit*).

²⁹ Note that the label black has two meanings in the British context, which our data do not allow us to disentangle. Black in the narrow sense of the word as used in the state’s race relations politics refers to people of Afro-Caribbean, and sometimes also of African origin. However, there is also a broader, political meaning of black, which refers to (non-European) ethnic minorities in general (including Asians), and has become popular among radical minority and antiracist groups.

Asylum seekers almost completely disappear and the share of Jewish groups increases, but this is simply a result of the low degree of organization of the marginal group of asylum seekers, and the strong institutionalization of the—state-sponsored—Jewish community. Regarding theoretically more important findings, however, nothing changes: national origin becomes even more important as a basis for collective identities (86%) and racial and religious identifications remain extremely marginal.

For Britain, the general pattern also remains much the same, but there are two significant, and probably interrelated, changes. First, contrary to ‘black’, the racial category of ‘Asian’ does not seem to be relevant for self-identification. In fact, we found no organizations at all which identified themselves as ‘Asian’. By contrast, the share of the religious category of ‘Muslim’ almost doubles when we consider only named organizations. Since ‘Asian’ and ‘Muslim’ are alternative identifications for largely the same—Pakistani and Bangladeshi—immigrant groups, it may be the case that the difference between the results in columns 3 and 4 results from a media bias, which—in line with the official categories of British race relations politics—describes self-identifying Muslim claimants as ‘Asians’. This fits other accounts of the problems British Muslims encounter in their claims-making on a race relations system that was modeled on Afro-Caribbean blacks and has difficulty in incorporating Muslim immigrants from South Asia (e.g., Modood 1997).

Overall, the comparative results provide strong support for the national citizenship model. Neither the postnational, nor the multicultural model is able to explain why British minorities identify as racial or religious groups, and their German counterparts on the basis of their homeland national or ethnic origin. Taken on their own, the British results are in line with what the multicultural model would lead us to expect, but the comparison with Germany shows that the strong mobilization of religious identities we find in the British context is not a general consequence of the presence of culturally different minorities, but depends on a facilitating political context, which stimulates claims-making on the basis of cultural

identities. Where such an affirmation of multiculturalism by the state is lacking and immigrants are officially seen as citizens of another state, as in Germany, national origin becomes the overriding form in which migrants are identified and identify themselves.

One finding for Britain, however, is difficult to reconcile with the national citizenship model and supports the multicultural emphasis on cultural difference as an important source of migrant claims-making. Although the racial label 'Asian' is the officially sponsored identity for migrants from the Indian subcontinent, the Muslim identity of Pakistani and Bangladeshi immigrants is much more powerful, especially in self-identification. Although the British variant of multiculturalism cannot be seen as a political environment hostile to the mobilization of cultural identities, British race relations politics certainly favors 'black' or 'Asian' over 'Muslim'. The dominance in migrant claims-making of 'Muslim' over 'Asian' therefore indicates that there are limits to the capacities of national modes of minority incorporation to shape migrant identities in their own image. And likewise it shows that there is at least some truth in the multicultural emphasis on cultural difference.

A second aspect of the actor-dimension concerns the territorial scope of migrant and minority organizations (Hypothesis 2.2). For those acts of claims-making for which an organization was explicitly mentioned, Table 2 shows whether these organizations were international, Europe-wide, homeland-based, or otherwise based in a foreign country, or whether their territorial scope remained confined to the German and British polities. Contrary to the hypothesis drawn from the postnational model, the territorial scope of the large majority of migrant and minority organizations does not reach beyond the boundaries of the nation-state: 73% of all claims in Germany and as much as 86% in Britain were made by national³⁰ organizations of immigrants and minorities, based in, and limited to the German and British polities. In contrast, international, European and foreign migrant organizations played a marginal role in claims-making. In the light of all the talk about Europe, both in the

postnational perspective and in the wider academic discussion, the most surprising finding is perhaps the virtual absence of European-level migrant organizations. In Britain we found no claims by such organizations at all, in Germany just four cases. This finding confirms the point of view of those authors who have pointed out that migrant organizations on the European level have remained relatively impotent actors, not least because migrant groups—even from the same ethnic origins!—from different European countries often have widely diverging opinions about the aims and strategies of integration and antiracism (e.g., Favell 1998).

Of course, for those bent on looking for evidence of postnational trends, there were a few examples of the involvement of transnational organizations in claims-making. The data show, however, that such cases were the rare exception rather than the rule. The only (at least in Germany) significant form of organization that transcended national boundaries were organizations based in migrants' homelands such as the Kurdish Workers' Party PKK or the Iranian People's Mojahedin. To the extent that they put forward claims aiming at the improvement of the situation of migrants from the respective homeland in Germany or Britain, such forms of migrant organization may still be interpreted as evidence of postnational tendencies. However, such cases were rare, too. Homeland-based groups were almost exclusively occupied with political issues relating to the politics of migrants' countries of origin, e.g., Kurdish separatism, rivalry between Turkish extreme right and left groups, or opposition of Chinese exiles against the communist regime in China. Far from constituting some kind of challenge to the nation-state, such forms of claims-making reflect the ongoing conflicts surrounding state-building and consolidation in many countries outside Western Europe and North America.

An additional weakness of the postnational model is that it has no answer to the question why homeland-based organizations play a much more important role in Germany

³⁰ 'National' here and in the remainder of this section refers to 'within the confines of the nation-state' and

than in Britain (26% and 6%, respectively). As we have indicated above, this result can be explained within the national citizenship model by the different ways in which migrants and minorities are included or excluded from the political community. As we saw in Table 1, the exclusive German model of ethnic citizenship and the labeling of migrants and minorities by the state as ‘foreigners’ has led migrants in Germany to retain a collective identity based on the national and ethnic categories of their homelands. Such identifications, of course, benefit homeland-based groups, who—like the German state—continue to see migrants as citizens of their countries of origin, who can be called upon to make a contribution to the political struggle in the homeland. By contrast, the British model facilitates migrant and minority organization within the national context, both because it actively facilitates such forms of organization through subventions and the opening of channels of access to the political process, and because it stimulates migrants to identify themselves as racial or cultural minorities within British society.

The postnational model does not stand or fall, however, by the transnational organization of collective action alone. One form in which postnational citizenship takes shape is when collective actors, whether themselves transnational or not, by-pass national authorities and directly address institutions and authorities outside the nation-state (Hypothesis 3). Our data contain several examples of claims-making along these lines. Thus, in 1994 a group of 200 German Kurds drove to French Strasbourg to offer a petition to the European Parliament against the persecution of Kurds in Turkey. In another example, German Roma and Sinti groups appealed to the UNHCR to move against the German government’s plan to deport refugees from this ethnic group back to Romania. In Britain, we have two cases in which the International Islamic Front and the Supreme Council of British Muslims called upon the Allied Coalition during the 1991 Persian Gulf War to cease hostilities. But there is precious little else. While the postnational model suggests that these are typical examples of

therefore includes the national, regional and local levels of the polity.

migrant claims-making in the age of globalization, Table 3 makes clear that such postnational claims-making was highly exceptional. Again, the most surprising finding may be the insignificance of the EU and its institutions as a target for migrant and minority demands (about 1% of claims in both countries). With 2 per cent in Britain, and 1 per cent in Germany, claims addressed to other supranational institutions were equally rare. By contrast, the nation-state was the target of 73% of German and as much as 95% of British minority claims-making. Once more, the only significant form of claims-making transcending national borders are claims addressed at the governments of migrants' homelands. Such cases are not of the type asking homeland governments to intervene with the German or British governments on behalf of migrant rights, which would still fit the postnational model. Almost exclusively they are related to political conflicts in the homeland. Finally, we may note again that homeland-related claims are much more frequent in Germany than in Britain, which provides further support to the comparative arguments drawn from the national citizenship model discussed above.

Having discussed collective identities, organizations, and addressees, we now turn to the content of claims by migrants and minorities. Table 4, which shows the distribution of migrant and minority claims across main issue fields, adds further detail to the picture. Apart from immigration and asylum issues, which are roughly of the same importance in both countries, Britain and Germany provide a striking contrast. German minorities made claims on homeland issues ten times more often than their British counterparts (42% compared to 4%). In Britain, most claims fall in the category of 'minority integration politics', by which we denote claims-making related to the integration, rights, and social position of resident minorities, which, by contrast, make up only a small minority of German claims (51% compared to 6%). The issue field of anti-racism, which includes claims-making against

xenophobia and right-wing violence³¹, is somewhat, though not dramatically, more important in Germany (32% against 22%). In line with the national citizenship model (Hypothesis 4.1) we thus find that British minorities focus primarily on their integration and rights within British society, whereas the most important field of claims-making for their German counterparts refers to the political situation in migrants' homelands. In as far as German minorities make claims related to their position in Germany, these tend to be largely defensive: most of the antiracist demands were protests against the wave of xenophobic violence that swept across Germany in this period, sometimes accompanied by the demand on German authorities to provide better protection against such attacks. Proactive demands for an extension of migrant and minority rights were, however, not very frequent in Germany, in stark contrast to Britain. We will return to this in more detail below.

For the moment, we would like to point at an interesting finding in the German case that emerges from a comparison of the percentage for homeland issues in Table 4 (42%), and the percentage of claims addressed at homeland authorities in Table 3 (25%). Partly this difference is explained by claims for which no explicit addressee was mentioned. These were primarily attacks by Kurdish groups against Turkish targets in Germany, such as restaurants, banks, or travel agencies. Indirectly, such acts of violence of course also aimed at putting pressure on the Turkish government, but because this was not explicitly mentioned they do not show up in Table 3. However, there also was a sizeable number of claims addressed at the German government, but related to homeland issues (6% of all claims). For instance, Kurdish and Iranian groups accused the German government of supporting repression in their homelands by selling military equipment to the Turkish and Iranian regimes. In a way, such claims may be considered to be examples of transnational collective action, although of a rather different type than assumed in the literature on postnational citizenship. While we found very few examples of migrants trying to mobilize supranational or homeland authorities

³¹ Claims against institutional forms of discrimination, for instance by the police or the judiciary, were included

to improve their position in the countries of immigration, we do find some support for transnational claims-making in the other direction, attempting to mobilize host society authorities or using the relative political freedom in the host society against the homeland regime. The point is that there is little new or postnational about such forms of transnational claims-making by migrants, exiles, and political refugees. Just ask Karl Marx, Mikhail Bakunin, or the Ayatollah Khomeini.

Our main point regarding the greater importance of homeland-related organizations, addressees, and claims in the German context of an ethnic-exclusive model of migrant incorporation has now sufficiently been made. We will therefore now focus the remainder of our analysis exclusively on those claims related to immigration and ethnic relations in the host society. We first ask how important claims-making by migrants and ethnic minorities is in this respect, compared to the claims-making by actors based in the majority population of the host society, such as state and party actors, or labor unions, churches, and other civil society groups. Both the postnational and the multicultural perspectives strongly emphasize the active role of minority organizations in challenging immigration and minority politics (Hypothesis 4.2). Table 5 shows, however, that minorities have been able to play such a role only in Britain. British ethnic minorities were responsible for 21 per cent of the total claims-making on immigration and ethnic relations, a higher percentage than was achieved, for instance, by the national government (14%), or by members of the national parliament (13%). With 7 per cent of all claims, German minorities played a much less prominent role in the public debate on immigration and ethnic relations, which may have been *about them*, but was not nearly to the same extent as in Britain influenced *by them*. At the risk of becoming repetitive, we again have to conclude that the national citizenship model is best able to make sense of these striking cross-national differences. In Britain, ethnic minorities *can* challenge the official politics of ethnic relations, because they command the political resources and are offered the

in the category of minority integration politics.

opportunity to do so. Britain's race relations and anti-discrimination legislation and its self-proclaimed status as a 'multicultural society' constitute important discursive resources for minorities, who can challenge the British state by referring to its own aims and promises.

Finally, we focus our attention in closer detail on the contents of migrants' claims on immigration and ethnic relations. Although our earlier examinations of the model have not been very positive, we must still allow for the possibility of more indirect forms of postnational claims-making, which do not directly involve transnational actors, neither as claims-makers nor as addressees. To be fair, it has to be said that in their more prudent formulations of the postnational thesis, authors such as Jacobson and Soysal acknowledge that the nation-state in many cases remains the forum through which postnational claims-making has to pass. In this view, national organizations may make claims on national governments, but frame their demands with reference to transnational or supranational actors, rights and conventions (Hypothesis 4.3). This may include calls on national governments to take action on the supranational level (e.g., to strive for a common European regulation of asylum procedures), or to respect international conventions (i.e., the Geneva convention on refugees). We also include in this category claims that refer to the consequences that national policies and developments may have on the transnational level.

In Table 6 we show the territorial frame of reference of migrant claims-making. Even in this case, however, we find little support for the postnational model, with 94 percent of claims made in Britain being firmly locked within a national frame of reference, and as much as 99 percent of those in Germany. Again Europe is surprisingly off the agenda in both countries. In fact the only example we found was a statement by German Roma and Sinti organizations calling on the German government to include the Romani language in the European Charter on Regional and Minority Languages. Other claims with a supra- or transnational dimension were also rare, both in Britain (three claims by organizations invoking the supranational authority of Islam), and in Germany (four claims by Jewish groups

backing their claims for combating xenophobia and anti-semitism by referring to the negative consequences that extreme right tendencies in Germany might have for the country's image abroad and for foreign investments in the German economy). In Britain, we find five claims (2.3%) with a bilateral dimension, including for instance a black Member of Parliament demanding reparations payments to British blacks and their homelands as a compensation for British involvement in slavery.³² All in all, however, the results of Table 6 underline our previous findings that a few examples of claims-making beyond national boundaries exist, but that they are the exception rather than the rule and cannot in any way be considered a representative characteristic of minority claims-making. Given the fact that we have now given the postnational model three chances to prove its validity (with regard to actors, addressees, and the content and framing of claims) the clear conclusion to draw seems to be that from our data the postnational model of citizenship has little empirical underpinning, to the extent that it risks coming apart at the seams.

The last important feature of minority claims-making that we wish to examine regards the type of rights that are demanded. This is particularly relevant for the multicultural citizenship thesis which sees demands for special group rights related to the recognition and protection of cultural differences—'cultural rights'—as central characteristics of minority claims-making (Hypothesis 4.4). In Table 7 we present only those claims which are made in the field of ethnic relations (corresponding to the categories 'minority integration politics' and 'antiracism/xenophobia' in Table 4) which make specific demands in terms of rights. The first point to make is that our findings give some credence to multicultural citizenship as about half of the claims for rights in both countries are 'cultural', with most of these being group specific.³³ In the German case, by far the most important group demanding cultural rights (5

³² In addition, as the table shows, there were four cases in Britain which were unclassifiable with regard to the territorial frame of reference of the claim. These were all made by Islamic groups whose claims consisted of asserting the importance of Islamic faith or the Greatness of Allah, but without the contextual grounding that would enable their territorial categorization.

³³ Demands for special group rights (i.e., for a specific minority group), comprised most of the cases of 'cultural

out of 12 cases) were Roma and Sinti (gypsies) demanding recognition as a national minority, with the same rights as the Danish and Sorbian (a Slavic people in the Czech-Polish border region) minorities. Since Roma and Sinti have been travelling through Germany and the rest of Europe for centuries, they occupy a different position from that of recent immigrants such as the Turks and may therefore with some legitimacy claim the status of a national minority. In that sense, their important contribution to multicultural claims-making in Germany confirms Kymlicka's (1995) point that national minorities have a stronger basis for claiming special cultural rights than ethnic groups of immigrant origin. Apart from this special case, more recent immigrants to Germany made very few claims to cultural rights, or, for that matter, to any rights at all. Claims for rights amounted to only 9 per cent of all minority claims-making on ethnic relations, the remaining 91 per cent being mainly defensive claims against discrimination and xenophobic violence (see also Table 4). The potential for societal disintegration as a result of culturally based demands seems thus very remote in the contemporary German context.

In contrast, we find more evidence to support the multicultural thesis in Britain. Here, the demands for specific group cultural rights were predominantly made by Muslims (23 out of 37 cases), with others being under the self-definition of Blacks, Jews, Rastafarians, Afro-Caribbeans, Indians, Pakistanis and Gypsies. These include examples of exactly the kind of cultural claims that are much discussed in the literature on multiculturalism. Thus the Muslim UK Action Front demand a cultural extension of British blasphemy law, in the words of its spokesperson: "The case will point out the common ground between Christianity, Judaism and Islam. In many past blasphemy cases... protection was afforded to the Old Testament, which was essentially Judaism."³⁴ We also have an example of a British headscarf (*foulard*)

rights' in both countries (10 of the 12 in Germany; 37 of 39 in Britain). Most of the demands for rights in the other categories were claims for non-group specific rights, such as equal citizenship and voting rights in Germany, and equal rights in the labor market in Britain. In total 59 percent of the demands for rights in Britain were for specific group rights, compared to 38 percent of those in Germany.

³⁴ Note that our method allows analysis of the strategic action of claims in relation to the qualitative detail of the

case, where the activist states: "There was nothing in the school rules about headscarves when we went there. The rules were amended last year... We are not fanatics or fundamentalists. We just want the right to continue our education and practice our faith." What is notable from these examples which are not atypical, is that the demands are made for an extension of the existing British multiculturalism. In the first case, the Muslims want to be added onto the list of acknowledged religions in the same way that they claim an earlier wave of migrants—the Jews—were incorporated. Likewise the headscarf claims are demands made in an inclusive rather than an incommensurable way. We have very few examples of more fundamentalist Islamic demands that challenge rather than address the authority of the nation state, one made by a group in relation to Rushdie was, "Let us take him to Medina and let us stone him to death. Every Muslim should be prepared to cast the first stone."

It seems therefore that apart from the odd exception, the majority of cultural demands are better explained by the national context of a state sponsored multiculturalism which gives opportunities for framing demands in this way. This argument is backed up by the comparative finding that there are much more demands for rights as a percentage of claims-making on ethnic relations (42 percent versus 9 percent), and claims-making on ethnic relations is itself more important (Table 4), in Britain than in Germany. That Muslim identity has difficulty fitting in the British context may be explained by the fact that British discrimination legislation does not acknowledge the right to religious equality (except for in Northern Ireland), and so Muslims are in real terms offered only the rhetoric and not the substance of equality in British multiculturalism. Indeed of the special group rights claimed by Blacks, more were framed in terms of civil or social rights than as cultural rights, one example being the right of blacks to be tried by juries with black representation. This returns us once more to the point we have made several times about the impact of the racial configuration of the British citizenship model on claims-making.

'speech' which is actually reported.

CONCLUSIONS AND DISCUSSION

Our leading question in this article has been whether immigration and the claims-making of migrants and ethnic minorities fundamentally challenge the liberal nation-state, as is supposed in theories of postnational and multicultural citizenship. Making an overview of the results of our comparative analysis of claims-making by migrants and ethnic minorities in Britain and Germany in the 1990s, the answer to this question must be negative. This is certainly the case with regard to the postnational model. Contrary to this perspective, which sees the nation-state as increasingly ‘insignificant’ and ‘irrelevant’, the nation-state continues to be by far the most important frame of reference for the identities, organizations, and claims of ethnic minorities, and national authorities remain the almost exclusive addressees of their demands. To be sure, some of migrant claims-making, especially in Germany, transcends national borders, but it does so in ways which are not postnational in any meaningful sense. These forms of claims-making simply take another nation-state—not the host society, but migrants’ homeland—as their frame of reference. In some cases, such as the Kurds and Kosovo-Albanians in Germany, they even strive for the creation of new independent nation-states. Such claims-making by political exiles is not a new phenomenon at all, but has accompanied the nation-state since its formation.

By contrast, we found precious little evidence for the types of claims-making that are according to the postnational model typical for the modern migrant experience: transnational migrant organizations intervening in national politics, migrants addressing supranational institutions, minorities making demands on national governments in the name of international legal conventions and rights, none of these forms of postnational claims-making accounted for more than at most a few per cent of the claims-making of migrants and minorities. While this holds for postnational claims-making generally, the almost complete absence of claims-

making related to the European Union is a particularly surprising finding, which suggests that European integration has not nearly progressed as far as the rhetoric of both proponents and opponents of this project would have us believe. For the moment, Europe continues to be a coordinating committee for nation-states, laden with symbolism but with little autonomous power. Migrants in Europe seem to have understood this better than many social scientists, as have, by the way, European voters, the majority of whom do not even bother to vote for the Strasbourg puppet show called the European Parliament.

The last line of defense of postnationalists might be to argue that universal human rights declarations and conventions have been incorporated in the constitutions and legislation of liberal nation-states and that therefore even claims-making that remains fully confined to the nation-state may have a postnational dimension. This watered-down version of postnationalism implies a diffusion of universal human rights principles from the supranational to the national level, which runs counter to historical evidence. Human rights appeared as 'self-evident truths' in national constitutions and bills of rights long before words such as supranational or globalization had been conceived. They are primary constituent principles of modern liberal nation-states, and are more of a basis for extending national citizenship than a pall-bearer carrying it to an early grave.

Saskia Sassen (1998, p. 73) might have a point when she argues in defense of the postnational position that it is often easier to point at continuities than to detect new, emergent developments. But even if we see postnationalism merely as an incipient trend, and not as a state of affairs—which is certainly not the position of bold postnationalists such as Jacobson and Soysal—we think the empirical evidence should at least produce significant indications of the dawning of such a new era. Of course it is no problem at all to find examples which fit the postnational model; we have mentioned some in this paper. However, they are rare exceptions rather than the rule of migrant claims-making, and if they are indicative of a trend, it must be one that is at its earliest beginnings and remains for the moment more of a fiction than fact.

An additional weakness of the postnational model is that it stands empty-handed when it comes to explaining cross-national differences among liberal nation-states regarding the claims-making of migrants and ethnic minorities.³⁵ As our comparison of Germany and Britain has shown, cross-national differences in this respect are striking. While British immigrants mobilize on the basis of their racial and cultural difference from the majority society, the identities of German minorities refer to the national and ethnic categories of their homelands. Whereas homeland issues play an important role in Germany, they are marginal in the claims-making of British minorities, who focus primarily on issues related to their rights and integration in British society. In so far as German migrants focus on their position in Germany, their claims are primarily defensive and directed against overt xenophobia and racist violence. While such claims are not unimportant in Britain, too, we find in addition a sizeable number of proactive claims for extensions of minority rights. Finally, we have shown that ethnic minorities in Britain play a much more important role in the overall public discourse on migration and ethnic relations than their German counterparts, who as ‘foreigners’ are not only symbolically, but to an important extent also materially excluded from the political community.

This brings us to theories which stress the continuing relevance of national models of citizenship for the incorporation of migrants and ethnic minorities. Within the European context, Germany and Britain represent in many respects diametrically opposed incorporation regimes, which we have labeled ‘ethno-cultural exclusionist’ and ‘multi-cultural pluralist’. While the German model puts up important symbolic and material barriers to the acquisition of membership in the political community by foreign migrants, the British model provides for

³⁵ To the defense of Yasemin Soysal it must be noted that in her ‘Limits of Citizenship’ (1994) she acknowledges and presents important evidence on cross-national differences in migrant and minority mobilization in different European countries. To explain these differences she points, much along the lines of the argument of the present paper, at the different traditions and institutional arrangements of migrant incorporation in these countries. In that sense Soysal’s empirical analyses, which point at the importance of national contexts, are strangely at odds with her main theoretical conclusions, which emphasize the irrelevance of national compared to postnational forms of citizenship.

much easier access to citizenship, and in addition gives—limited but still substantial—recognition to their cultural difference. These liberal policies for resident migrants, it must be said, are coupled with immigration policies that make it in many respects more difficult for new migrants to enter the national territory than in the German case. Also in other respects, it is inappropriate to interpret German-British differences in a ‘good guys versus bad guys’ frame. The British model of migrant incorporation is to an important degree a consequence of its imperial, colonial past, and by way of several restrictive changes in citizenship legislation subsequent British governments have done much to limit these consequences. By contrast, Germany has recently made some, still cautious, steps toward abandoning its ethnic conception of nationhood, and more radical changes may well occur in the very near future.

However, for the moment Germany and Britain continue to embody two markedly different models of nationhood and migrant incorporation. The hypotheses we have drawn from these two models fit our evidence on minority claims-making remarkably well. Far from being insignificant, merely symbolic leftovers from a time when the nation-state still counted, national models of citizenship have important consequences for the identities, forms of organization, and types of claims of ethnic minorities. To an important extent, patterns of migrant claims-making mirror the way in which the nation-state in the two countries defines the relation between ethnic minorities and the political community. Germany sees immigrants as ‘foreigners’, and that is exactly the way in which German minorities behave: they organize and identify themselves on the basis of their national origin and are still, although many of them have been in Germany since decades, preoccupied with the politics of their homelands. By contrast, the British ‘multicultural’ state treats its immigrants as racial and cultural ‘minorities’ within British society and again, that is pretty much how British migrants have come to see themselves: they mobilize as ‘blacks’ or ‘British Muslims’ and make claims on the British state for equal opportunities and multicultural rights.

In our theoretical discussion of national models of citizenship, we have identified a

third ideal-typical model of citizenship, namely the assimilationist model, which in the European context is best represented by France. It will be an interesting question for further research to investigate whether a distinct pattern of migrant claims-making can be identified in France, which matches its particular model of migrant incorporation. On the basis of the findings of this paper, we may hypothesize that such a French pattern of claims-making will have certain similarities with our results for Britain. Because migrants have easy access to membership in the political community in France, too, we would expect them to have weak ties to their homelands' politics, as well. However, because of French pressures toward assimilation and the lack of recognition for ethnic and cultural difference, we would expect a different type of collective identities (more interethnic and based on the common status of 'immigrant') and different claims (equality and antiracism, but not cultural rights) than in Britain.

Extending the analysis to include other countries would also allow us to arrive at more conclusive answers with regard to the challenge of multicultural citizenship. The evidence from Britain and Germany is mixed in this regard. In Germany, we found little evidence of strong pressures from ethnic and cultural minorities for the recognition of cultural identities and special group rights on the basis of cultural difference. In Britain, however, we found a substantial number of such claims, mostly though not exclusively originating in Britain's Muslim community. At the very least, the lack of a significant number of such demands in Germany, which also has a large Muslim population, shows that demands for multicultural rights are not a necessary consequence of the presence of a large population of non-European, culturally different migrants, but depend on the availability of political opportunities that legitimate and provide incentives for such claims-making. It may nevertheless be that the British experience shows where Germany will be going once it has liberalized its citizenship legislation and German minorities start focussing on their rights and position in Germany instead of on the politics of their homelands. That is certainly what opponents of such a

liberalization fear. The French experience might again provide an interesting alternative here. Since France invites migrants into the political community on the basis of equality, but to the exclusion of cultural difference, it could follow that migrant claims for multicultural rights are not nearly as important in this country as in Britain. If that is the case, the multicultural challenge would not be an assault on the unity of the nation-state imposed on it by the pressures of cultural difference inherent to immigration, but a response to an opportunity structure willingly created by some, but not all nation-states. Far from being a mechanism to appease pressures arising inherently from immigration, state-sponsored models of multiculturalism may then turn out to stimulate such claims in the first place. And if indeed the multicultural appetite grows the more you eat, there may ultimately be something to the warnings against a self-sustaining fragmentation of the nation-state that opponents of multiculturalism fear.

However, even Britain does as yet not come close to such a scenario and there is no indication that it will in the near future. Most demands by minorities in Britain seem to be made within the national configuration of citizenship. Even the special group demands for cultural rights that are predominantly made by Muslims are perhaps best explained by the resistance of Race Relations policies to the recognition of religious equality. British multiculturalism offers Muslims a racial equality that contradicts their self-definition as a religious group. However, with the exception of the relatively few examples of incommensurable claims of fundamentalist Islamic activists, most Muslim claims demand an extension of the classical understanding of political and social equality in citizenship, to include the recognition of religious equality. Given the appropriate 'cultural tools', British Muslims might be more likely to support than challenge the nation-state.

Although we are convinced that our analysis provides strong support for the importance of national models of citizenship and migrant incorporation, we do not want to conclude this paper without having addressed a final caveat that may have been on some

readers' lips for a while. There is an alternative explanation for the differences found between Britain and Germany which does not focus on national politics, but on the differences between individual migrant groups. As we have seen, Britain and Germany have drawn their immigrants from different countries and regions of the world. In Britain, the most important groups come from the Caribbean and the Indian subcontinent, in Germany by far the largest group of migrants come from Turkey. So perhaps the preoccupation of German claims-making with homeland issues is just a peculiarity of Turkish and Kurdish migrants, and the focus on cultural issues a typical characteristic of Muslims from Pakistan and Bangladesh? This is a rather a-theoretical and primordialist explanation, but still cannot be discarded out of hand. The question remains, in our view, why Turkish Muslims would be so different from Pakistani Muslims. Conversely, it cannot be maintained that the Indian subcontinent has no equivalent of the Turkish-Kurdish conflict that could fuel homeland-related claims-making from this region in Britain. So the question is why Pakistani-Indian, Hindu-Sikh, and a myriad of other political conflicts on the Indian subcontinent do not to a significant degree translate into related claims-making by British minorities from these regions. While we consider these to be important arguments against the alternative interpretation, the ultimate test would of course be to compare the claims-making of migrants from the same region of origin in different countries of settlement. Because European immigration countries tend to have their own particular areas of migrant recruitment, this is easier said than done. Adding France to the comparison would not help much, for instance, because the most important French migrant groups come from the Maghreb countries and Portugal, which are marginal sources of immigration in both Britain and Germany. The Netherlands, however, would be a helpful case in this regard, because it has sizeable minorities from the Caribbean (allowing a comparison with Britain), from Turkey (which could be compared with German Turks), as well as from Morocco (comparable with France).

With our comparison of Britain and Germany, we have to our knowledge, been the

first to present a systematic empirical comparison of the claims-making of migrants and ethnic minorities in two of the most important immigration countries of Western Europe. Our interpretation of the striking differences between these two countries in the framework of national models of citizenship and migrant incorporation has shown what merits such an approach may have. However, as our concluding remarks indicate, many important open questions regarding the relationship between nation-states, immigration and minority claims-making remain. The challenge for further research therefore is to extend the kind of analysis we have presented here to include other countries and models of incorporation, both in Western Europe, and in the classical immigration countries of the New World.

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Table 1: Collective Identities of Actors in Claims-Making by Migrants and Ethnic Minorities in Germany and Britain, 1990-1995

	Germany: all claims	Germany: named organizations	Britain: all claims	Britain: named organizations
Status Groups	14.1%	8.0%	19.1%	0.0%
Foreigners	5.3%	5.7%	0.4%	-
Asylum seekers	7.7%	0.8%	10.2%	-
Immigrants	-	-	0.4%	-
Minorities	0.3%	0.5%	8.1%	-
Aussiedler	0.8%	1.0%	-	-
Racial Groups	0.1%	0.0%	37.7%	34.2%
Blacks	0.1%	-	26.3%	34.2%
Asians	-	-	9.3%	-
Afro-Caribbeans	-	-	1.3%	-
Black African	-	-	0.8%	-
Religious Groups	3.3%	6.4%	24.6%	47.4%
Religious Jewish	2.6%	5.1%	-	-
Muslim/Islamic	0.4%	0.8%	24.2%	47.4%
Other	0.3%	0.5%	0.4%	-
National and Ethnic Groups	82.5%	85.6%	18.6%	18.4%
EU countries	0.5%	0.3%	0.4%	1.3%
Ex-Yugoslavs	1.7%	1.5%	0.4%	-
Roma and Sinti/Gypsies	11.2%	14.4%	0.8%	2.7%
Secular (ethnic) Jewish	17.6%	36.5%	4.7%	7.9%
Other European	0.1%	-	0.8%	-
Turks	15.2%	14.1%	0.4%	-
Kurds	32.9%	20.1%	0.8%	-
Iranians	2.0%	2.8%	0.4%	-
Pakistani	-	-	1.3%	2.7%
Bangladeshi	-	-	4.2%	2.7%
Indian	-	-	1.3%	1.3%
Sikhs	-	-	1.3%	-
Other	0.8%	1.1%	1.8%	-
Total	100.0%	100.0%	100.0%	100.0%
N=	757	389	236	76

Chi-Square (on the basis of main, bold-type groups for identities),
for all claims: 491.17; p=0.000; df=3; for named organizations 259.17; p=0.000; df=3

Table 2: Territorial Scope of Organizations in Claims-Making by Migrants and Ethnic Minorities in Germany and Britain, 1990-1995

	Germany	Britain
Supra/transnational	0.5%	7.2%
European	0.5%	-
Foreign-based	0.3%	1.2%
Homeland-based	26.0%	6.0%
National	72.7%	85.5%
Total	100.0%	100.0%
N=	388	83

Chi-square: 33.55; p=0.000; df=4

Table 3: Territorial Scope of Addressees of Claims-Making by Migrants and Ethnic Minorities in Germany and Britain, 1990-1995

	Germany	Britain
Supra/transnational	1.1%	2.2%
European	1.1%	0.7%
Homeland governments	24.5%	2.2%
National authorities	73.3%	95.0%
Total	100.0%	100.0%
N=	351	141

Chi-square: 34.60; p=0.000; df=3

Table 4: Main Issue Fields of Claims-Making by Migrants and Ethnic Minorities in Germany and Britain, 1990-1995

	Germany	Britain
Immigration Politics	1.5%	5.9%
Asylum Politics	15.7%	11.9%
Minority Integration Politics	6.3%	50.8%
Anti-Racism/Xenophobia	32.1%	21.6%
Inter-Ethnic Conflict	0.9%	3.8%
Homeland Politics	41.5%	4.2%
Other	2.0%	1.8%
Total	100.0%	100.0%
N=	757	236

Chi-square: 319.50; p=0.000; df=6

Table 5: Share of Ethnic Minorities in All Claims-Making on Immigration and Ethnic Relations in Germany and Britain, 1990-1995

	Germany	Britain
Migrants and Ethnic Minorities	6.8%	20.7%
Other Actors	93.2%	79.3%
Total	100.0%	100.0%
N=	5,396	1,047

Chi-square: 205.65; p=0.000; df=1

Table 6: Territorial Frame of Reference of Minority Claims-Making on Immigration and Ethnic Relations in Germany and Britain, 1990-1995

	Germany	Britain
Supra/transnational	1.0%	1.4%
European	0.2%	-
Bilateral	0.2%	2.3%
National	98.6%	94.4%
Unclassifiable	-	1.9%
Total	100.0%	100.0%
N=	421	213

Chi-square: 15.77; p=0.003; df=4

Table 7: Claims by Minority Actors for Rights in Germany and Britain, 1990-1995

	Germany	Britain
Citizenship Rights	11.5%	-
Other Political and Civil Rights	26.9%	11.5%
Social and Economic Rights	3.8%	20.5%
Cultural Rights	46.2%	50.0%
Anti-Disrimination Rights	-	15.4%
Equal Rights Unspecified	11.5%	2.6%
Total	100.0%	100.0%
N=	26	78

Chi-square: 22.58; p=0.000; df=5

Claims for Rights as a Percentage of All Migrant Claims-Making on Ethnic Relations (i.e., immigration and asylum issues excluded)	8.9%	42.4%
N=	291	184

Chi-square: 74.02; p=0.000; df=1

