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Chapter 2

Migration and Ethnic Relations as a Field of Political Contention: An Opportunity Structure Approach

RUUD KOOPMANS AND PAUL STATHAM

INTRODUCTION

Immigration politics, a state's capacity to regulate immigration is intimately related to the field of ethnic relations politics, the contentious politics where states policies deal with resident migrants and minorities, and where influential political actors such as parties and interest groups, and majority and minority publics, dispute the criteria for entry to the national community. Since countries in Europe universally put up restrictive policy barriers to new immigration in the early seventies (Baldwin Edwards and Schain 1994), conflicts over ethnic relations have become explicitly politicised issues focused on the social, political and cultural integration of resident migrants, minorities and their offspring into the nation state, whereas debates over new immigration have been framed predominantly through the issue of political asylum. This emergence of ethnic relations and immigration as a central issue within European politics, was especially apparent in the 1990s, due in no small part to the emergence of migrants and minorities themselves as influential political actors making demands within the framework of national politics, which in many cases provoked reactions – both

xenophobic and supportive – from mobilised sections of the majority public, and political responses – both liberal and restrictive – from the state. In addition, the multi-levelled nature of political responses, where supranational EU policies, and national and local policies, compete for sovereignty to make decisions and implement measures, has arguably made ethnic relations politics and immigration a challenge to the nation state (Joppke 1998).

Starting from a position where European countries implemented starkly contrasting policy approaches for the migrant populations who stayed on to become permanent residents, ethnic relations politics would appear to be a *prima facie* case for testing the degree of convergence or divergence in Europe, brought by the globalizing pressures of increasing supra-national political influence, and especially EU governance. At the same time, since national approaches to migration and ethnic relations are closely tied up with issues of national identity and belonging, resonant political conflicts over whether or not states should acknowledge cultural diversity as a legitimate basis for giving special rights of recognition or redress to groups from migrant populations have been apparent across the continent, often framed explicitly around the issue of Islam in Western societies. The ethnic pluralization of European countries, a product of past immigration and contemporary flows of asylum seekers, refugees and illegal immigrants, plus the increased assertiveness of resident minorities within national and local politics, is a disputed issue in many national polities often heated up by the dynamics of public confrontation and street violence. Trapped within this pressure cooker of globalizing and pluralizing strains, national variants for ethnic relations and migration policies seem increasingly incapable of fulfilling the political demands that different actors make on the nation state. This gap between the delivery capacity of states' policies and the increasingly acute and conflicting political aspirations – often diametrically opposed – of actors entering the field, has transformed ethnic relations and migration into a central field of political contention across Western Europe.

Following the agenda set in the introduction, the primary objective of this chapter is not to provide an exhaustive literature review on the state of the art of research on migration, ethnic relations and xenophobia. Instead we aim to specify the important developments that have contributed to the emergence of a more comparative and politics-focused paradigm for research in the 1990s, and identify persistent gaps and missing links, before proposing an integrative theoretical framework that draws on social movement and collective action approaches, and links national citizenship to a political opportunity perspective.

Prior to the recent resurgence of academic interest in migration and ethnic relations in response to the politicisation of the issue in the 1990s, much of the literature can be categorised by three main research topics: migration studies and integration policy approaches; minority/migrant associations and collective action; and extreme right politics and xenophobic mobilisation. Surprisingly, given their overlapping concerns these approaches have remained largely distinct from one another.

Much research in the migration studies tradition tends to focus rather apolitically on social structural, socio-economic and demographic aspects of migrations flows (for a criticism, see Miller 1981, 1982).¹ To the extent that it considers political processes at all, this approach is dominated by policy-centric accounts focusing on elite concerns. Often based on statistics drawn from official sources or designed to collect information for state bodies, such approaches see migrants themselves primarily as passive 'objects' of policies for incorporation into the national host society, with the patterns of their presence strongly determined by economic and demographic trends and cycles, for example, in the labour market, housing, or education (e.g., Vermeulen and Penninx 1994; Münz, Seifert, and Ulrich 1997). The dominant focus is on social and economic integration of migrants in a welfare state perspective. Little consideration is given in this context to non-elite actors, or the political process in general.

Among the research which addresses such criticisms by focusing on the relationship between minorities/migrants, their collective action, and the host society, two main

approaches prevail: those operating within a class paradigm, and those within a race or ethnicity paradigm (see Ireland 1994, and in this volume). Class theory provides a suitable framework for extending the underprivileged structural and socio-economic position of migrants in the host society into a theory that refers to political participation and migrant action (e.g., Castles and Kosack 1974, 1985; Miles 1982; Miles and Phizacklea 1977, 1984). Here economic divisions within the working classes are seen as racialised under the structural crises of advanced industrial capitalism. Thus shared ethnicity or race is primarily a 'class' identity and all forms of political participation by migrant and minority populations are seen as evidence for an emergent class consciousness of migrant workers. When migrant activism includes political co-operation with indigenous workers – for example, through trade union activities, and labour and communist political parties – then it becomes seen as evidence for a common class consciousness transcending the false consciousness of ethnic and racial identity. Although they at least focused on the migrants themselves and offer a relational theory that links them to the host society, these neo-marxist approaches often remain overly deterministic, tending to explain the associational activities of migrants as a condition of processes of industrial modernisation in the capitalist economy, rather than as responses to the political environment. The relationship between migrants/minorities and the political institutions facing them, remains undertheorised, with references to political processes limited to largely descriptive case studies, with class basis as the dominant explanation for collective action.

The ethnicity/race paradigm, is in fact in many formulations largely similar to the class paradigm (see e.g., Rex and Tomlinson 1979; Miller 1981, 1982). The important difference is, however, that in contrast to 'neo-marxist' approaches the ethnic and racial collective identities of minorities and migrants are not seen simply as 'false consciousness' waiting to be unveiled by the forces of history and class warfare. On the contrary, many authors point out that the ethnic and racial identities of minorities will continue to form the basis for collective action

independently from class, not least because of shared experiences of racism and discrimination in their societies of settlement. Although importantly seeing ethnic differences as a basis for societal cleavages, such approaches have a tendency to replace the socio-economic determinism of class by the cultural characteristics of the group itself – i.e., 'ethnic' or 'homeland' identities – as the determinant of behaviour (e.g., Fijalkowski 1994; Schoeneberg 1985). Once more the relationship of minorities and migrants to the political institutional framework is relatively neglected in explaining levels and types of activism.

Besides theories of class and ethnicity/race, which at least focus on migrants and their collective action, even if they do not fully and systematically relate this to the political process, there is a research tradition which makes a more direct link between social structure and collective behaviour. Taking a cue from Durkheimian sociological traditions, this research uses models of socio-economic change and ethnic competition between migrants and majority populations for taking phenomena such as xenophobic violence and urban riots as indicators of social disintegration. Through this lens, the consequences of migration on the economy create pressures that translate into psychological frustrations and anomie among the 'losers of the modernization process' (Heitmeyer et al. 1992) who respond to increasing social inequalities by violent mobilization. Riots over ethnic difference – explained by perceptions of relative deprivation held by different ethnic groups – are routinely taken as evidence for a breakdown in the 'social order'.

As well as being a popular explanation in media and public discourses for riots by minorities or violent reactions against them, this approach has a strong salience in academic and policy responses to periods of race riots and ethnic urban violence (see, for example, the Scarman Report as a response to the inner urban ethnic riots of the 1980s in Britain, which defines policy solutions within a social integration paradigm). In addition, it has been particularly pervasive in research on extremist behaviour, shaping much of the work on xenophobic mobilization and extreme right voting, not least because it is drawn from classical

approaches for explaining the rise of pre-war fascism. More recently, this approach has been present in several guises. In research on xenophobia and support for extreme right political parties, perpetrators of racist violence or holders of right-wing values are seen as reacting to a loss of prestige and status that is caused by structural modernization processes, such as industrialisation and individualisation (for a recent example of the modernization thesis, see Betz 1994). In addition, Islamic extremism in Germany has been explained by the disaffection of Turkish youth in response to a lack of social integration (Heitmeyer, Schröder, and Müller 1997). And the same logic also underpins the 'ethnic competition' approach that explains inner-urban ethnic conflict by perceptions of relative deprivation among 'white' lower classes forced to compete with migrant labour (e.g. Husbands 1994; Olzak 1992; Esser 1999).

In short then, much traditional work in the migration, ethnic relations, and xenophobia field, has not taken the political process systematically into its explanatory approach. Moreover, although they clearly relate to similar topics and have overlapping concerns, migration, ethnic relations and xenophobia have tended to remain separate and distinct research fields. In addition, approaches drawn either from class, ethnic, or modernisation theories, are strongly influenced by the dominant national integration paradigms in different countries. This insularity militates against cross-national learning processes. The specific national integration paradigms that are evident in the different ways in which European countries label migrants and minorities, as 'racial minorities' in Britain, 'immigrés' (immigrants) in France, or 'Ausländer' (foreigners) in Germany, are so strongly entrenched in the perceptions of actors and reproduced in social relationships, that this leads to a myopia of alternative scenarios by politicians and social scientists alike. In reviewing the development of the ethnic relations fields in Britain and France, Adrian Favell (1998) has recently argued this point strongly, describing how British scholars defining everything as 'race', could find little to learn from their French colleagues' 'colour-blind' republicanism, and vice versa.

Nation-bound, inward-looking and overly descriptive, the migration, ethnic relations and xenophobia field remained thematically fragmented and seriously lagged behind the political and transnational developments that had carried the subject matter to the centre stage of politics by the start of the 1990s. A particular weakness was the lack of systematic cross-national research, or even cross-national references when explaining specific national cases (Bovenkerk, Miles and Verbunt 1990). With increasing trans-European academic exchanges, in part unleashed by EU sponsorship, the 1990s witnessed an upsurge in cross-national volumes. Initially, this produced a wave of largely descriptive edited volumes in the distinct extreme right/xenophobia and migration/ethnic relations fields, where authors from different countries offered their expertise in single country case studies. (on ethnic relations see: Rex and Drury 1994; Wrench and Solomos 1993; Baldwin Edwards and Schain 1994; Fassman and Munz 1996; Thränhardt and Miles 1995 in relation to Europe; on extreme right see Husbands, Hainsworth).

Helpful in allowing strangers to meet and talk with one other for the first time, this batch of single country studies was seriously hamstrung in the attempt to develop common theoretical approaches, even within the two distinct disciplines. Although marked sometimes by excellent individual single country studies, there was a generic unevenness in the substantive scope, not least because authors largely remained committed to their national interpretation of the problematic. As a result, the end product seldom measured up as a collective project. Cross-national reflection, the most telling and potentially important contribution of such projects, was often limited to either introductory and concluding essays, although some of these did develop emergent general theoretical observations (e.g., Rex 1994; Cornelius, Hollified, and Martin 1994) that were to stimulate the group of researchers who took up a more systematic comparative research agenda. This emergent agenda for research has crystallized around three perspectives, which we want to discuss and develop in more detail in the following sections: studies of citizenship and conceptions of nationhood; neo-

institutionalist and political opportunity perspectives; and finally studies that emphasise postnational and European developments transcending the nation-state.

CITIZENSHIP AND CONCEPTIONS OF NATIONHOOD

One important way in which the theoretical deficit and the lack of genuinely comparative studies in the migration and ethnic relations literature have recently been addressed is through the emergence of citizenship – the set of rights, duties, and identities linking citizens to the nation-state – as a central analytic category. This interest in citizenship is rooted in the reinvigoration of this concept in wider political-philosophical debates on civil society, social cohesion, and communitarianism (e.g., Walzer 1983; Schlesinger 1992; van Steenbergen 1994; Young 1998). Particularly in the United States, there has been a strong preoccupation in these debates with the position of ethnic minorities and the – beneficial or harmful – effects of 'multiculturalism', the extension of cultural group recognition and rights to ethnic minorities (e.g., Taylor 1994; Kymlicka 1995; Shapiro and Kymlicka 1997; Glazer 1997). While these philosophical debates have remained largely normative and prescriptive, they have inspired a number of studies with a more empirical focus in Europe (e.g., Alund and Schierup 1991; Rex 1996; Modood and Werbner 1997; Martiniello 1998; Parekh 1998). Faced by several causes célèbres across Europe, such as the Rushdie affair in Britain and the foulard affair in France, where fierce political controversies developed over the position of Islam in relation to the nation state, these authors took the nationally specific problems of policy approaches to cultural diversity in different European states as a starting point for revisiting the concept of citizenship. This work contributed to a greater sensitivity to the increased processes of cultural differentiation and pluralization brought by migration to European societies as both normative and policy relevant issues. However, these more

empirically-oriented studies often have the disadvantage of using 'multiculturalism' in a very loose way – more or less as a fashionable alternative for 'ethnic relations' or 'minority integration' – that has sometimes little to do with the more precise meaning of a form of citizenship based on cultural recognition and group rights. Moreover, empirically many of these studies tend to draw thinly and descriptively from a few well known and supposedly representative examples.

At the same time, interest in citizenship has been revived in a somewhat different and more focused way by the rise of nationalist and xenophobic movements throughout the world and the following boom in academic studies addressing these phenomena (e.g., Hobsbawm 1990; Greenfield 1992; Canovan 1996; Jenkins and Sofos 1996; Calhoun 1997). Taking up the distinction between 'ethnic' and 'civic' forms of nationalism that is common in this literature, Rogers Brubaker's (1992) comparative historical work on citizenship and traditions of nationhood in France and Germany provided an important catalyst for an increase in comparative work in ethnic relations in the 1990s. Brubaker explains the divergent ways in which France and Germany have dealt with post-war migrants by the different 'cultural idioms' of citizenship – based on ethno-cultural belonging in Germany, and on civic culture and political institutions in France – that have historically guided institutional practices and legal traditions in the two nation-states. Citizenship is seen not only as a form of membership, but also as a specific cultural imprint of nationhood, which functions as a form of symbolic closure restricting, albeit to different extents and under nationally specific conditions, the ability of migrants to join the national community. Thus, Brubaker explains the persistently higher naturalization rates in France compared to Germany, by contrasting the *jus soli* acquisition of citizenship – where access is either automatic by birth on the national territory or easily available through naturalization – dominant in the French tradition of nationhood, to the *jus sanguinis* basis of citizenship – where access is difficult for those who do not have ethno-cultural ties to the nation – which is the dominant tradition in Germany. Brubaker's

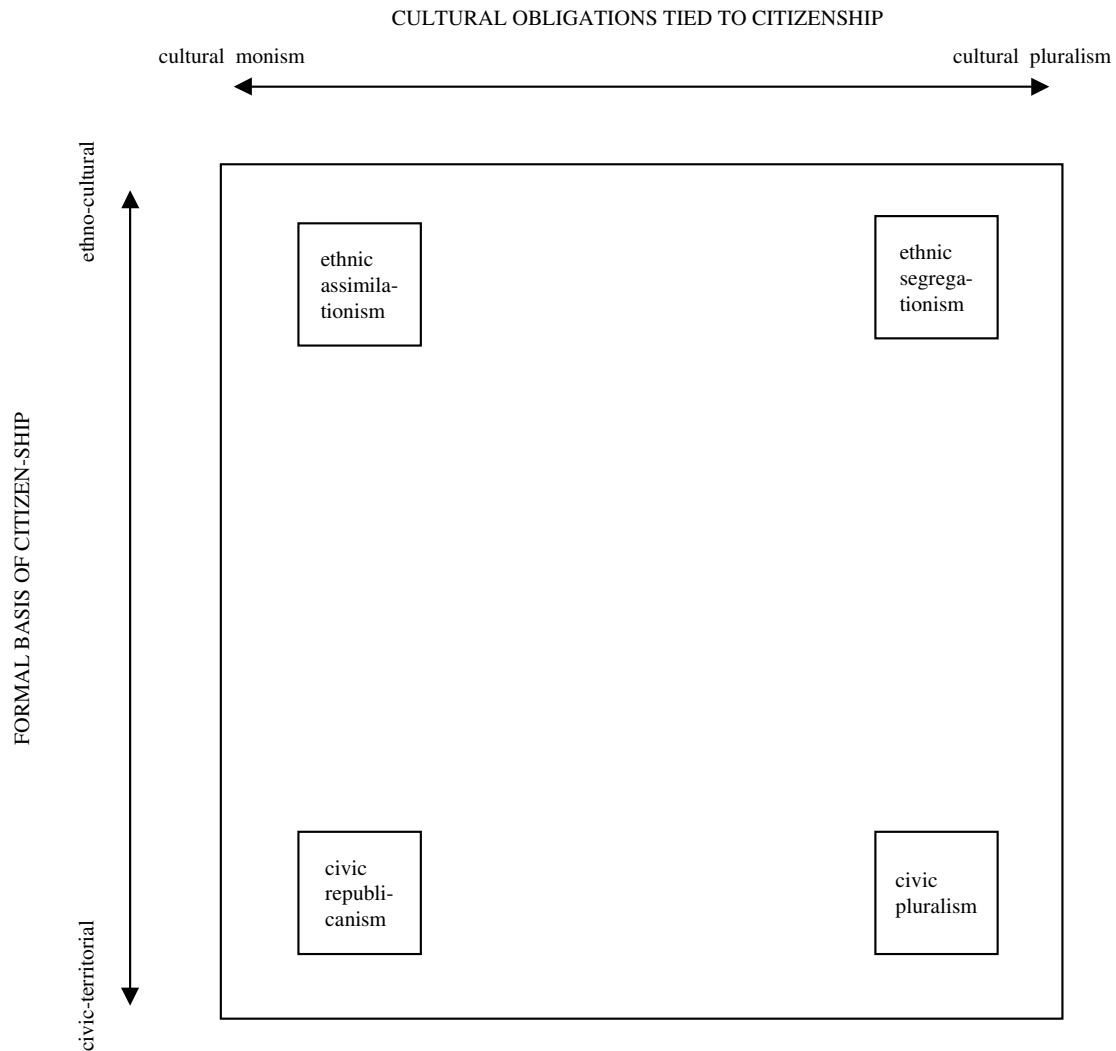
distinction between ethno-cultural and civic-cultural forms of citizenship largely ignores, however, the cultural rights dimension that has been central to the multiculturalism debate. Particularly, this leads him to overstate the 'openness' of the French citizenship regime, which may provide for easy formal access to citizenship, but couples this with the expectation that new citizens of migrant origin will assimilate to a unitary, national political culture.

It therefore seems fruitful to combine the cultural rights dimension of the multiculturalism debate with the formal criteria for access to citizenship central in Brubaker's analysis. This is what many scholars in the migration and ethnic relations field have done in distinguishing different citizenship models or regimes (e.g., Castles and Miller 1993; Smith and Blanc 1996; Kleger and D'Amato 1995; Safran 1997). Generally, these authors have come up with three types of citizenship regimes, which each define a particular institutional and discursive setting for political contention over migration and ethnic relations. The first regime, labelled 'ethnic' or 'exclusive' denies migrants and their descendants access to the political community, or at least makes such access very difficult by way of high (institutional and cultural) barriers to naturalization. Germany is usually the typical example for this model, other examples given include Austria, Switzerland, and Israel. The second type of regime, labelled 'assimilationist' or 'republican' and exemplified by France or the old 'melting pot' approach in the United States, provides for easy access to citizenship, among other things through *jus soli* acquisition at birth, but requires from migrants a high degree of assimilation in the public sphere and gives little or no recognition to their cultural difference. Thirdly, 'multicultural' or 'pluralist' regimes, usually including the present-day USA, Canada, Australia, and in Europe, Britain and the Netherlands, provide both for easy formal access to citizenship, and recognition of the right of ethnic minorities to maintain their cultural difference.

This three-fold typology has two drawbacks. First, it does not exhaust the logical possibilities. If indeed there are two dimensions to citizenship, one (ethnic versus civic) defining the formal criteria of access, and another (multicultural versus assimilationist)

defining the cultural obligations which such citizenship entails, we end up with four, not three models (see Koopmans and Kriesi 1997; Koopmans and Statham 1999). In addition, the 'typology' approach to citizenship has rightly been criticized for its tendency to obscure both the dynamic aspects of the process of migrant integration, and the important differences within states, both among the integration approaches advocated by different political actors, and among those applied to different categories of migrants (Joppke 1996; see also Entzinger in this volume). We propose to address these two problems by conceiving of citizenship not in the static categories of typological 'models' or 'regimes', but as a conceptual (and political) space, in which different actors (which include nation-states, but also subnational actors such as political parties or civil society actors) and policies can be situated, and developments can be traced over time. The contours of this conceptual space are defined by the formal and cultural dimensions of citizenship.² Thus conceptualized, the stability of citizenship regimes, and the uniformity with which they cover different political actors, policies, and immigrant groups become issues for empirical investigation, not implicit assumptions tied to the rigidity of a conceptual typology.

FIGURE 1: A Two-dimensional Space for Situating Conceptions of Citizenship



On the vertical axis, the continuum runs from conceptions of citizenship which favour ethno-cultural bonds as the basis for the constitution of the political community, to those which emphasize a universalist civic-political culture and attribute citizenship on the basis of the territorial principle. It is easily argued that these extremes hardly occur in reality. Few nation-states completely exclude the possibility of naturalization for those who do not belong to the own ethno-cultural group³, and every civic nation attributes citizenship on the basis of descent or cultural belonging in addition to the territorial principle. It has even become somewhat

fashionable in the migration and ethnic relations literature to give up the distinction between ethnic and civic nationhood altogether.⁴ However, in view of the important cross-national differences that can be found along this dimension, we must consider this rejection as an overreaction to the rigidity of some of the earlier formulations of this distinction, including Brubaker's.

Partly, the problems with national citizenship models such as Brubaker's derive from the fact that they are unidimensionally based on the ethnic-civic distinction and confound it with the second, cultural dimension of citizenship, which in fact largely crosscuts it. Here, the continuum runs (on the horizontal axis in the figure) from conceptions of citizenship that insist on conformity to a single cultural model that is to be shared by all citizens, to culturally pluralist conceptions, which seek to retain, or even stimulate cultural heterogeneity and allow their subjects to follow a variety of cultural patterns. Again, it hardly needs to be pointed out that these ideal-typical conceptions do not empirically occur in their purest form. In liberal democracies, controversy mainly focuses on cultural conformity outside the strictly private sphere, e.g., in the sphere of law, the education system, or the media. There are clear boundaries to cultural pluralism, too, which in Western societies are usually related to the respect of individual human rights or notions of equality. For instance, no Western democracy has legalized female circumcision, although some advocates of multiculturalism have gone as far as proposing to tolerate it in a "limited" form so as to respect cultural pluralism. Nevertheless, here too, differences among Western democracies remain large enough to make the distinction a fruitful one for analytical purposes. For instance, no one with any knowledge of French and Dutch integration policies could fail to notice the difference regarding the degree of cultural pluralism that is tolerated and facilitated. Muslim and Hindu schools, migrant organization on the basis of ethnicity, television and radio channels catering specifically to migrants, including a Dutch Muslim Broadcasting Corporation, and all this publicly funded – French policy-makers would not even think about such extravagancies in their wildest dreams.

In the figure, we have put small named boxes in the outer corners of the conceptual space, which indicate the four ideal-typical configurations of citizenship and migrant incorporation that arise from the combination of the vertical and horizontal axes. We are well aware that most countries, actors, or policies will be situated, or on the move somewhere in the space between these boxes. Nevertheless, we think they are usually closer to some ideal-types than to others, and even if they are in the process of moving from one point to another we need a conceptual system of co-ordinates in order to tell where they are going and where they come from.

The logical starting point for a discussion of these basic models of citizenship is ethnic segregationism, because this is often the point of departure in the process from migration to settlement. Ethnic segregationism is defined by exclusion from the political community of migrant newcomers who do not share the ethno-cultural background of the majority society. At the same time migrants are not forced to give up their own cultures, and the state may even actively promote such cultures and discourage assimilation to the majority culture. This comes close to the typical "guestworker" approach, which did not give migrant workers any political rights, nor much prospect to attain them through naturalization, but did not make any cultural demands on them, either. On the contrary, countries with guestworker programs often put quite some effort and financial resources into stimulating migrants to retain their cultural heritage and ties to their homelands, which were seen as facilitating their eventual repatriation. Even today, countries such as Germany and Switzerland still offer "education in own language and culture" to children of migrants.⁵ In Switzerland and some of the German federal states, such education is often still given in close co-operation with embassies and other homeland authorities. It is interesting to note that in other cases (the Netherlands and some of the more liberal German states) such educational programs still exist, too, but are now legitimated with reference to "multiculturalism" instead of as a way to facilitate migrants' eventual return. This example may serve to demonstrate that in spite of the ideological rifts that separate the two, it is in actual practice not always such a long way from the ethnic segregationist guestworker philosophy to the

civic-pluralist, multicultural approach. This, of course, is due to the fact that – as the figure illustrates – both share the idea of retaining cultural boundaries between ethnic groups and of preventing assimilation. As a consequence, the educational approach in conservative Bavaria has a surprisingly cultural-pluralist touch. Bavaria was the first and is still one of very few German states to have instituted Islamic education for pupils from Turkey in public schools: in separate classes, of course, in Turkish, and given by religious teachers appointed by the Turkish Ministry of Religious Affairs.

Ethnic segregationist approaches have not disappeared with the formal end of the guestworker programs. As indicated above, conservative regions and parties in Switzerland and Germany still adhere to them. Moreover, in almost all European countries very similar policies are now applied with regard to asylum seekers and refugees, who are usually physically separated from the rest of society, have no or a very restricted right to work, and are generally not stimulated in any other way to assimilate since that would only make it more difficult to send them back if their asylum requests are denied. In addition, ethnic segregationism is the leading ideology of the so-called "New Right" (*nouvelle droite*, *neue Rechte*), whose ideologues such as Alain de Benoist advocate the notion of "ethnopluralism" (Gessenharter and Fröchling 1998). Departing – at least publicly – from blatantly racist ideas of cultural superiority, this notion entails the claim that all cultures are equal, but should be kept separate and "intact" in order to prevent a loss of identity and social cohesion that would benefit neither the majority society, nor minority cultures. No wonder then, that extreme right parties such as the Front National or the Vlaams Blok sometimes have warm relations with right-wing organizations from migrant homelands, such as the Turkish Grey Wolves or the Maghrebian Amicales, which share the same objective.

The latter examples indicate that ethnic segregationism even has its advocates among minority representatives. First and foremost this includes those organizations closely linked to homeland governments, which have often little interest in too much integration of migrants

into the host society. For instance, when migrants were first allowed to vote in the Dutch local elections of 1986, the Moroccan authorities officially prohibited Moroccan nationals in the Netherlands to use their right to vote. Non-governmental organizations based in migrant homelands may also have reasons to promote ethnic segregationism. This includes movements for regional independence such as the Kurdish PKK, which has not much to gain and much to lose from Kurdish ethnics in Germany obtaining the German nationality or assimilating to German culture. For another variant of ethnic segregationism promoted by minority organizations we may look beyond Europe at the United States, where radical black organizations such as the Nation of Islam go as far as condemning mixed marriages and demanding an independent black state.

Although ethnic segregationism still has its defenders, most of the guestworker countries have meanwhile moved at least partly away from it. In view of the – slowly and in some circles still not realized – fact that former guestworkers have become permanent settlers, this seems to be an inevitable development. No democratic state can uphold for very long a situation in which a significant percentage of the permanently resident population is excluded from political rights. From the figure it becomes clear that two basic options present themselves: either the idea of distinct and separate cultures is retained, but ethnicity is given up as the formal basis of citizenship, which can then be extended through easier naturalization and the introduction of *jus soli* elements to include migrants from a different ethnic and cultural background. This constitutes a move in the direction of the multicultural, civic-pluralist model. In this case, allowing dual nationality may offer itself as an additional instrument to include migrants as citizens, for in the civic-pluralist view the fact that retaining the nationality of the homeland might constitute a barrier to adaptation to the majority culture is not seen as a problem, but as a fundamental right or even a virtue.

The other option, which is philosophically close to the communitarian position (Cohen 1999: 263), is to retain the formal ethno-cultural basis of citizenship in its essence, but to make it

easier for migrants to obtain citizenship through naturalization on the condition that they fulfill certain criteria of assimilation to the majority culture.⁶ In this case, conditional naturalization remains the single option for becoming a member of the community and unconditional attribution of citizenship through *jus soli* is not considered. Dual citizenship cannot be tolerated from this perspective, since it would mean to extend citizenship without demanding that the candidate give up her or his original ties to the homeland culture. In other words, it would imply a move towards civic-pluralist multiculturalism, which in the eyes of ethnic assimilationists can lead to nothing but dangerous "parallel societies" (Laurence 1999).

Those who have followed the recent discussions in Germany on the reform of citizenship law will recognize that this debate was to an important extent about which of these two options should be chosen. While most politicians – except perhaps the Bavarian CSU – agreed that something had to be done to make it easier for migrants to become citizens, they disagreed strongly on how this should be achieved and about the kind of Germany that this should lead to. For conservative adherents of the ethnic assimilationist view, to become a "German" in the formal sense of nationality requires that one first has to become a German in the cultural sense. This idea is expressed in the Christian Democrats' maxim that "naturalization should be the crowning of the integration process, it cannot be a means towards integration". Not surprisingly, the controversy with the Red-Green government focussed on the latter's proposal to introduce *jus soli* and to generally tolerate dual nationality, which would have put Germany firmly in the civic-pluralist camp. After the Christian Democrats had staged the most successful signature campaign in German history (five million signatures) and had won the Hesse elections, a compromise was passed by parliament, which is considerably less radical than the original proposal. Instead of a bold move to multiculturalism, Germany now moves more carefully along a path somewhere between ethnic assimilationism and civic pluralism.

While the story so far captures the experience of countries such as Germany or Switzerland, it

does not describe the typical pattern for countries which already had some civic-territorial notion of citizenship in place when postwar immigrants began to arrive on a massive scale. Civic-territorial as against ethno-cultural notions of citizenship have been facilitated in those countries which used to be colonial powers and have in the postwar period become the target of large flows of postcolonial migration, such as Britain, France, and the Netherlands. In an effort to continue their domination over their colonies, all these colonial powers, albeit to varying extents, transformed the relation with the colonies from one of pure domination and patronage to an at least formally more equal partnership (e.g., the British idea of the "Commonwealth") between the "mother country" and the "overseas territories". This also implied certain rights to settlement and citizenship in the mother country for the inhabitants of the colonies (Thranhardt and Miles 1995: 6). For instance, according to the new statute for the Kingdom of the Netherlands of 1954, the inhabitants of Surinam and the Dutch Antilles obtained full citizenship rights and unlimited rights of settlement in the European part of the Kingdom. Moreover, already before such changes, conceptions of nationhood based on a notion of ethnic purity had become untenable as a result of the colonial experience. Thus, after Indonesian independence, more than 300,000 people who could claim Dutch citizenship came to the Netherlands, many of whom were people of mixed Dutch-Indonesian descent, or ethnic Indonesians who had co-operated with the colonial regime.

However, there were important differences among the imperialism philosophies and practices of the colonial powers, some of which are still important for understanding these countries' migrant incorporation regimes today. Although the colonial experience strengthened civic-territorial notions of nationhood in all colonialist countries, its impact on the second, cultural dimension of citizenship was not uniform. Here the contrast is greatest between Britain and France, with the Netherlands less outspoken, but closer to Britain. Britain ruled its colonies and particularly its "crown jewel" India through a system of "indirect rule", in which local structures of authority were left largely intact as semi-autonomous intermediary structures between the

colonial administration and the native population. By contrast, France's system of colonial rule reflected the centralized, uniform structures prescribed by jacobinism which also characterize metropolitan France's own polity. Parts of the colonial empire, such as French Guyana, Réunion, or Algeria before independence, were even fully assimilated into the French polity as *départements outre mer* as if there was nothing distinguishing them from, say, Valle de Marne. These different traditions of colonial rule served – consciously or unconsciously – as important models when (former) colonial subjects started to arrive on a massive scale in the imperial center. To an important extent, the British multiculturalist and the French assimilationist approaches to incorporating postwar migrants were not invented in the London or Paris of the 1960s, but long before in Delhi and Alger.

Partly the problems the former colonial powers have had in the field of migration and ethnic relations derive from the fact that what worked well as a recipe for colonial rule has not always been the optimal solution towards the integration of postwar migrants. France's main problem has been that while in the colonial situation conformism to the French republican political culture could simply be imposed, postwar migrants, particularly those of Muslim belief, have not been so easily assimilated and have sometimes demanded a *droit à la différence*, a right to be different – not just inconspicuously in the private sphere (a form of cultural pluralism that does not conflict with republican standards) but publicly and officially recognized. Moreover, the French approach has difficulty in dealing with the fact that the cultural group differences that are denied as legitimate policy categories, do form the basis of discrimination and racism from the side of the majority population, most clearly voiced by the Front National's polemic against "unassimilable" immigrants. Insisting on the equal treatment of all and loathing group-specific approaches, France does not have the policy instruments to combat forms of social exclusion that are rooted in ethnic and cultural difference (see also Fennema's contribution to this volume).

As a result, France has been confronted with two countervailing pressures for change. The Socialists, supported by some migrant organizations have in the 1980s tried to steer France in the

direction of a more culturally pluralist approach, offering limited recognition to the right to be different. One important policy change in this context was the Socialist-led government's 1981 liberalization of association law, which for the first time allowed migrant organization on the basis of nationality or ethnicity. However, the cautious moves in this direction seem to have come to a complete halt afterwards, especially after the ill-famous foulard affair, which demonstrated the strong resistance among important sections of the French political and intellectual élites against making even the slightest concession to unitary citizenship.

To the extent that the republican model fails to eradicate ethnicity and cultural difference as publicly visible and contested categories – as it obviously has – this also opens up opportunities for a challenge from the right, which proposes to resolve the dilemma by moving in another direction, namely towards an ethnic assimilationist model.⁷ Thus, one of the most important and successful demands – partly implemented in the i Pasqua of the Chirac government⁸ – of the Front National has been the abolition of the jus soli attribution of citizenship and making naturalization dependent on assimilation to French culture. In the eyes of the extreme right – and judging by its success in those of many French voters – the easy access to French citizenship has created increasing numbers of faux français, "false Frenchmen", who are French by nationality, but not by culture – culture understood, of course, not in the "thin" sense of adherence to republican values such as democracy, liberty, and equality, but in the "thick" sense of folk traditions, Catholicism, and sometimes plainly race.

Britain and the Netherlands' "multicultural" approaches to migrant incorporation have had their own problems. Here the problem has not been a lack of policy instruments to tackle disadvantage based on ethnic, cultural, or racial difference, but rather that these instruments have sometimes reinforced and solidified the very disadvantages they were supposed to combat. Taking ethnic and racial criteria as a basis for policy making geared to ending disadvantage and discrimination on the basis of ethnic and racial criteria has often been much like trying to drive the Devil out with Beelzebub. As Miles (1982) has argued for Britain and Rath (1991) for the Netherlands, the

labelling of migrant groups as disadvantaged minorities has led to a process of "racialization" or "minorization", which has tended to reproduce race and ethnicity as bases for social disadvantage and discrimination.

This problem seems to have been aggravated by the particular mixture of paternalism and guilt that describes these countries' postcolonial hangover. On the one hand, there has often been a tendency on the side of the authorities to see migrants as incapable of ameliorating their own position and thus in need of benevolent assistance to overcome their *achterstand*, or "lagging behind" as the prevalent Dutch policy term puts it in a language reminiscent of that used in relations to Third World countries. This tendency has been reinforced by the sense of postcolonial guilt and the ever-present fear among authorities to be accused of racism, which have led to a rather "soft" handling of problems which disproportionately affect minorities such as social welfare dependence and crime, and a great weariness to use the state's sanctioning powers in order to push migrants to also themselves make a contribution to alleviating their disadvantage (e.g., to learn the language of the host country in order to improve employment opportunities). Particularly in the Netherlands, the combination of these factors has led to a vicious circle in which state policies have reinforced the image of migrants as a problematic, disadvantaged category in need of constant state assistance – not only in the eyes of the majority population, but also in those of many migrants and their representative organizations.⁹ To the majority population, migrants thus appear as a group deserving help, respect, tolerance, and solidarity, but not the kind of people that anyone in his or her right mind would want to employ or would want one's child to be in school with. As a result, in spite of the liberal rhetoric, the much better legal position, and the much higher level of tolerance for cultural diversity in the public sphere and in political debate, levels of ethnic segregation in the school system as well as levels of unemployment (relative to the majority population) are much higher in the Netherlands than in Germany (see Thränhardt's contribution to this volume).

More recently, this tendency of civic pluralism in a postcolonial context to slide in practice

into a form of ethnic segregationism has inspired a reappraisal of the civic republican model, especially in the Netherlands (Britain has always been closer to that model anyway). Instead of policies geared to specific ethnic groups, the central authorities as well as many local ones now prefer general policies for socio-economically disadvantaged groups, that include not only minorities, but also the "native" underclass. Moreover, the authorities have become more demanding with regard to migrants. For instance, newly arriving migrants are now obliged to follow an *inburgeringstraject*, a sort of "integration program", which entails intensive Dutch language courses and courses offering basic information about Dutch politics and culture.

What this extensive discussion of configurations of citizenship and the many shades in between them, is that unlike the more rigid typologies, our model of a two-dimensional conceptual space assumes neither fixed, nor uniform national co-ordinates. Each of the countries we have discussed has been almost continuously shifting position over the course of the last few decades. This reflects that everywhere, the incorporation of large numbers of culturally different migrants – after all a hitherto unknown challenge – has had much of a trial and error process. However, it is equally clear that the elements these countries used, combined, and varied upon during this learning process were to an important extent drawn from pre-existing institutional and cultural repertoires of citizenship and nationhood. For all its changes back and forth in the direction of more civic republicanism, ethnic assimilationism, or civic pluralism, France has always remained somewhere in the lower left corner of the conceptual space. The Netherlands, in spite of the recent reappraisal of republican policy instruments remains much closer to the civic pluralist pole than France, with Britain somewhere in between. Until very recently, Germany's policies, despite some minor shifts, remained close to the ethnic segregationist corner of the conceptual space. However, with its new citizenship legislation that went into force on January 1, 2000, it may be about to engage in the most radical process of change of the countries discussed here, although for the moment it is still unclear where it will end up.

Although it is sometimes necessary and useful to talk about national configurations of

citizenship in this generalizing way, we should not let this obscure the important differences that exist among policy areas as well as among actors within countries. Regarding policy areas, we have noted that asylum seekers everywhere tend to be subjected to a segregationist regime. In countries such as France and the Netherlands, which have both had guestworker programs and have experienced massive postcolonial migration, there have been important differences, at least initially, between the respective incorporation regimes. The contrast was perhaps largest in the Netherlands, where guestworker (non-)incorporation initially proceeded along much the same ethnic segregationist lines as in Germany and Switzerland, while the regime for postcolonial migrants was much more inclusive. Germany's incorporation of Aussiedler is an interesting and rather pure case of an ethnic assimilationist approach. Despite their often important cultural and linguistic differences from the German majority society, the inclusion of Aussiedler is based on the presumption that they are ethno-culturally Germans. As a result, Aussiedler are de-facto confronted with strong assimilation pressures. They have to become what they were supposed to be already and unambiguously, i.e., Germans, and have to give up what they supposedly never had, i.e., the Russian, Polish or Romanian parts of their cultural identity.

Especially important from the point of view of developing a framework for the analysis of migration and ethnic relations as a field of contention are the different positions taken by actors within countries. In this context, we may conceive of the conceptual space delineated in Figure 1 as the "playing field" on which such contention takes place, where actors position themselves relative to one another, and strategic decisions are taken to move in one direction or another. The increased contentiousness of the field means that the positioning of different actors within countries has become increasingly divergent. The massive postwar migration and the settlement of culturally different migrants have challenged traditional conceptions of citizenship and nationhood and different actors have proposed different answers to these challenges. In the process, consensus around traditional conceptions of citizenship and nationhood has eroded to a

smaller or lesser extent, and – as in the case of France where republicanism has never been fully accepted by the Right – latent dissent surrounding them has flared up again. In each country, one may point out actors, whose positions correspond most closely to one of the four ideal-typical models. In Germany the variation is relatively large. If we limit ourselves to party actors, the Greens take a civic-pluralist position, the Liberals and less outspokenly the Social Democrats tend towards a republican position, the main Christian Democrat party (CDU) has recently shifted in the direction of the ethnic assimilationist pole, while the Bavarian CSU still clings to the ethnic segregationist model, which most other parties (with the exception of the extreme right parties such as the Republikaner) have now left behind.¹⁰

NEO-INSTITUTIONALISM AND POLITICAL OPPORTUNITY STRUCTURES

A second and related development in the literature that has contributed to an increased awareness of the political dimensions of migration and ethnic relations has been the increased focus on the role of political institutions. Following the broadly influential 'neo-institutionalist' perspective (e.g., Hall and Taylor 1996, March and Olsen 1984), where institutional configurations are seen to influence the preference formation and strategies of political actors, and thereby specify the contours within which specific political actions are formulated and conducted, several authors have focused on political institutional arrangements for explaining the different national patterns of migration and ethnic relations policies (e.g., Cornelius, Martin, and Hollifield 1994; Freeman's 1992, 1995; Ireland 1994; Joppke 1997, 1998; Guiraudon 1998; as well as Soysal 1994 in as far as here analysis deals with national 'incorporation regimes'). These authors share a focus on politics and institutional arrangements, thus avoiding the socio-economic and cultural determinism that was present in the class, race/ethnicity, and modernization approaches discussed above. In this view, migration and ethnic relations are no longer marginal policy fields,

but political issues which take centre stage in liberal democracies, and where state control and policy outcomes are defined in the struggles over rights between individuals, groups and the state in the arena of domestic politics.

With a few exceptions of research that focuses on political institutional frameworks for explaining the success of extreme right political parties (Kitschelt 1997; Koopmans and Statham 1999; Eatwell in this volume), xenophobic violence (Koopmans 1996a, 1997; Karapin in this volume), and state responses to racism (van Donselaar 1995; Witte 1996; Fennema in this volume), neo-institutionalism has made little impression on the analysis of xenophobic movements. Applications of the institutional perspective to explaining ethnic minority political mobilization and participation have remained scarce, too. An important exception here is Patrick Ireland (1994 and in this volume; see also Koopmans 1999; Statham 1999; and Garbaye in this volume), who explains the different forms and levels of political participation by similar ethnic groups in France and Switzerland, by referring to the differential legal and political institutions – residence laws, naturalisation procedures, political rights, welfare policies – which shape migrants' involvement in the host polity. His main finding that similar migrant groups act differently in the two countries shows that 'institutional channelling' is a better explanation for the patterns of migrant activism than the socio-economic or cultural characteristics of the group itself, i.e., 'class', 'ethnic' or 'homeland' identities.¹¹ If cultural and social background were determinant of political behaviour, one would have predicted – counter to Ireland's findings – similar patterns of participation by the same ethnic groups in different countries.

Most neo-institutionally inspired studies, however, tend to take policies as the dependent variable and focus primarily on the role of political elites. Moreover, they mostly deal with the issue of state control over entry, and rarely with issues concerning the integration of ethnic and racial minorities (exceptions are Joppke 1996 and his contribution to this volume). Freeman's (1992, 1995, 1998) work on 'immigration regimes', for instance, emphasizes the ability of political elites to control decisions over immigration control away from the public domain. For

Freeman this elite monopolisation of power relative to the general public produces expansive immigration policies. He argues that politics has an intrinsic 'anti-populist norm'. Although the costs and benefits of immigration are unevenly distributed with the poor sections of the public facing the most costs, the organized pro-immigrant lobbies – the usual suspects listed as powerful economic interests, ethnic kin, the legal establishment, intellectuals, anti-racist movements, and the media (Freeman 1998:103) – ultimately get their way in the political process as they are better organised and resource-rich in contrast to the marginal sections of the public who have tendencies toward xenophobic sentiments. National similarities and differences in policy approach are therefore best explained by 'client politics'.

Besides its policy and elite biases, another weakness of neo-institutionalist approaches is their often weak appreciation of the role of public discourse and political culture. Discursive approaches have a long tradition in ethnic relations studies, but have long been heavily dominated by the crusade against racism of Teun van Dijk (1993) and his followers. This approach has not been very helpful for the development of comparative work within the field, since it tends to find 'racism' wherever it looks for it – thus turning the concept into a constant feature of Western societies rather than a variable to be explained. Recently, however, there has been a reappraisal of discursive approaches in genuinely comparative work. This is evident in the work of some authors who also draw on neo-institutionalism (e.g., Soysal 1994), but especially in Adrian Favell's (1998) comparison of 'public philosophies of integration' in Britain and France, which he sees as embedded in nationally-specific sets of language and symbols. However, his and similar analyses remain impressionistic and largely fall back on describing a limited number of famous political incidents. The same holds for many attempts to analyze the role of public debates and the media in explaining xenophobia, which in addition tend to present a one-sided, top-down picture of political party and media elites controlling public opinion (e.g., Husbands 1994; Thränhardt 1993; Brosius and Esser 1995).

In spite of the significant insights that the reappraisal of the political in both its institutional

and discursive guises has brought, further advances seem to depend on a better theoretical integration of the different approaches. First and foremost, this requires a theoretical linkage among political institutions, public discourses, and the level of actual interaction among the actors involved in migration and ethnic relations politics. Second, we need to move beyond the usual loose and vague references to 'institutions', 'political process', or 'public discourse', and specify much more clearly what these consist of, which dimensions can be distinguished, and which indicators might be used in empirical investigations. Especially for systematic comparative purposes, such specifications seem to be of the utmost importance if one wants to be able to identify explanatory factors and move beyond the reproduction of holistic national clichés. Third, there is an obvious need to include a broad spectrum of actors and actions in the analysis, instead of focussing exclusively on elite actions and discourses. This may help to bridge the gap between institutional and discursive analyses on the one hand, and the many descriptive accounts of ethnic and xenophobic organizations and mobilizations that are produced in a theoretical void, on the other. Last but certainly not least, it is necessary to provide a framework that can connect studies of minority integration and ethnic mobilization to the literature on xenophobia and extreme right movements. Given the obvious and important links between these phenomena it is almost absurd how the majority of studies on the extreme right continue to ignore migration and ethnic relations as a decisive political context, and how, on the other side, students of migration and ethnic relations have paid only marginal attention to the extreme right as an actor shaping political developments in this field.

We propose that such a theoretical integration can be furthered by drawing on theories of social movements and collective action and particularly the concept of 'political opportunity structures'.¹² Following Tarrow's succinct but accurate definition, political opportunity structures consist of "consistent – but not necessarily formal or permanent – dimensions of the political environment that provide incentives for people to undertake collective action by affecting their expectations for success or failure" (1994: 85). The political opportunity perspective builds on

resource mobilization theory's conception of collective action as rationally based on the perceived costs and benefits of different strategies and its emphasis on the need to mobilize resources as a precondition for mobilization (e.g., Zald and Ash 1966, Oberschall 1973, McCarthy and Zald 1977). However, where resource mobilization theory has a strong internal focus, the opportunity structure perspective places social movements firmly in their political context and emphasizes the importance of drawing resources from that environment, particularly for challenger groups which tend to control few resources of their own (e.g., Eisinger 1973; Tilly 1978; McAdam 1982).

An important cue for the political opportunity approach comes from the seminal historical research of Charles Tilly and his collaborators (e.g., Shorter and Tilly 1972; Tilly, Tilly, and Tilly 1975; Tilly 1978). These authors demonstrated that crises in political authority and especially dissent among political elites are better predictors for widespread periods of popular mobilisation and revolution than processes of socio-economic modernization, such as industrialisation or urbanisation. Popular revolts typically occurred at times of political crisis, for example, after defeat in war, when actors perceived opportunities for challenging the nation-state from below. As for cross-national differences in periods of political revolt, the basic premise to draw from Tilly is that levels of mobilization are not a direct outcome of national differences in patterns of modernisation, but are mediated by a country's particular structure of political institutions and its configuration of power relationships. In the intervening years, the concept of 'political opportunity structure' has been applied and further developed in both longitudinal (especially Tarrow 1989) and cross-national studies (especially Kriesi et al. 1992, 1995). Akin to the pervasive influence of neo-institutional approaches in other fields, this body of research has set the pace for the development of the social movements field over the last decade, and now branches increasingly into other fields of political study, for example, by extending the research focus to the policy outcomes of movements, and extending the type of political actors studied beyond the narrow focus on movements (see especially, contributions to Guigni, McAdam, and

Tilly 1999).

Partly due to the different needs of diachronic and cross-sectional research designs, different dimensionalizations of political opportunity structure co-exist. Tarrow's four dimensions are typical for the American research tradition, which usually focusses on the opening or closure of 'windows of opportunity' over time within a single polity: "the opening up of access to participation; shifts in ruling alignments, the availability of influential allies, and cleavages within and among elites" (1994: 86). By contrast, Kriesi et al.'s (1995: xiii-xvi) categorization is typical for the European focus on cross-national studies. Thus, three of their four dimensions consist of relatively stable features of political systems, which are extremely important in comparative analyses, but will often be constants in diachronic analysis: "national cleavage structures", "formal institutional structures", and "informal procedures and prevailing strategies". Their fourth factor, "alliance structures" summarizes the more volatile aspects of political opportunity emphasized by Tarrow. Thus, the two categorizations can easily be combined, and depending on one's primary interest in diachronic or cross-sectional analysis one may choose the one or the other operationalization as one's frame of reference.

Following Kriesi et al., a particularly important dimension of political opportunities are the national cleavage structures which define the political space which is available for challengers to introduce new conflicts into a polity. Here the chances for challengers to mobilise contentions are shaped by the existing politicised cleavages in society, such as conflicts over national identities, class conflicts, centre-periphery conflicts, or postmaterialist-materialist conflicts. Thus the emergence of supranational level of governance through the EU and the decline of the East-West bloc conflicts of the Cold War, have once more brought into question issues of national sovereignty and identity into the political domain that were in previous decades relatively non-contentious. In the face of globalisation and pluralisation, political demands for regional devolution may appear more legitimate if they can build on old ethnic cleavages. Alternatively, new political demands may emerge that stigmatise non-EU migrants as the threat to social

cohesion, using the legitimacy of the supranational political order to make claims. Both these trends are visible in the formation of demands by ethno-regional movements, such as the Lega Nord in Italy (Statham 1998).

Formal institutional or legal structures refer to the set of institutional actors in a polity and the legal arrangements which define their relationships and competencies. Specific dimensions of this opportunity variable may include the degree of centralisation of political institutions, the type of electoral system, and the separation of powers between the executive, legislative and judiciary. These institutional dimensions define the available channels of access for challengers to the polity, and may be relatively more open or more closed to specific types of challenges. For example, the 'first-past-the-post' local constituency-based electoral system in Britain provides less opportunities for extreme right political parties to gain office in national politics than most proportional or majoritarian electoral systems in mainland Europe. This may in part explain why xenophobia in Britain has become more channelled into diffuse violent racist attacks on the political margins than into conventional forms of political electioneering.

Regarding the more informal dimensions of political opportunities, prevailing elite strategies refer to the rules and procedures that have historically emerged within a polity for managing and resolving conflicts and for dealing with political challengers. Here instead of the cleavage structures, one refers to the more inclusive, consensual or more exclusive, polarizing political traditions through which conflicts – e.g., over class or between church and state – have traditionally been approached by elites, in ways that continue to shape official reactions to new challengers. To give a relevant example, the British official 'race relations politics' formula for integrating postcolonial minorities through measures to combat racial discrimination through equality of opportunity in the labour market, follows an elite political tradition for pacifying the class conflict by incorporation of the working classes through the establishment of the welfare state (Rex 1994, following the basic tenet of T.H. Marshall). At the same time, elite discourses defined minorities by 'race' which became tied to 'class' politics, and is also noticeable in the

salience for combining 'race' and 'class' discourses in British academia. This means that the opportunities available for political participation to British minorities have been strongly defined by class politics which is shown by high levels of involvement through the Labour Party and trade unions. And secondly, political opportunities facing minorities in Britain have been 'racialised', which has the effect of providing greater access to the polity for African Caribbeans who define themselves as a racial group, than it does for Bangladeshi and Pakistani groups who more often use a religious political identity as 'Muslims' (Statham 1999).

The fourth dimension of political opportunity structure is a more tied to the specific contingencies of time and place. Alliance structures refer to the specific balance of power relationships between actors at a given time and place, including the composition of the party system, and the relative strengths of political parties and the government. Regarding the opportunities for challenges, a particularly conducive situation for mobilization is when political elites are internally divided, as they are more likely under such conditions to attempt to form strategic alliances with extra-parliamentary actors and thereby shift the balance of power in their favour. Elite divisions can be common over issues such as immigration and may at times be stimulated by the legal constitutional framework. For example, constitutional change in Germany requires the consent of opposition parties. In the 1990s, this has facilitated the fact that the Christian Democratic demand to limit the constitutional right to asylum caused intense elite-level political controversies, followed by waves of public protest, collective mobilization and counter-mobilization in the public domain, that contributed to important and substantive changes in the outcomes of the policy process (see Koopmans 1996b and Karapin in this volume).

These specifications of the political opportunity approach undoubtedly introduced more theoretical and comparative rigour in the social movement field, but came under criticism for over-focusing on the institutional dimensions of opportunities, and failing to take seriously the cultural basis – cultural codes, collective identities – and discursive contents – frames and symbols – that carry the message of political contention (Gamson 1988; Melucci 1990; Eder

1993). Whereas these political opportunity approaches emphasised the strategic dimensions and material resources for mobilisation, the framing perspective draws on symbolic interactionism (Goffman 1974) and the public construction of social problems (Hilgartner and Bosk 1988). In this view, discontent, resources, and opportunities are not simply 'out there' in the external world, but have to be cognitively perceived, constructed, defined, communicated and mediated into public discourses, i.e. 'framed', to become a basis for collective action (see especially, Snow et al. 1986; Snow and Benford 1988; Gamson and Modigliani 1989). This approach underlines that social movement organisers have to define issues as problematic concerns, identify causes, present solutions, and make the political actors and institutions who are considered responsible for implementing policy decisions visible and accountable in the public domain. In addition, they have to convince their potential adherents that collective action is a necessary and a potentially successful means towards these ends – what Klandermans (1988) has called 'consensus mobilization'. Mobilizing public constituencies is difficult, firstly, because of competition from other actors who offer alternative definitions and solutions for the contentious issue, and secondly, because the public sphere has a structure that favours access to elites over movements, and the political discourse will already have a dominant way for defining a contentious issue-field that again is likely to be biased toward established elite views. Facing such constraints, movement organisers have to outflank other actors, such as counter-movements, civil society actors and public authorities, to successfully promote and mediate their own definitions of the situation and policy proposals.

Framing approaches have in turn been criticised for producing many 'ad hoc' and descriptive studies, and for lacking clear hypotheses about the effects of framing on levels and forms of collective action (see especially the self-critique by Benford 1997). This is the main point of Koopmans and Duyvendak (1995), whose analysis of anti-nuclear movements in several European countries shows that, although the movements had very similar argumentative strategies, the ones which were more successful in influencing public opinion,

were those active in countries such as the Netherlands, where the movement faced favourable institutional opportunities for preventing the construction of nuclear plants. In France, on the other hand, where all the major parties were firmly behind nuclear power and few opportunities for juridical intervention were available, levels for rejecting nuclear energy actually decreased among the public during the 1980s, contrary to the prevalent trend across Europe (see also, Nelkin and Pollak 1981; Kitschelt 1986). This example shows that the success of discursive efforts depends not just on the argumentative ‘quality’ of the framing strategies used by collective actors, but on their ‘fit’ with hegemonic discourses and on the institutional opportunities for inserting challenger frames into the process of policy formation and implementation. The important question is how one can insert this dimension of public discourse within a political opportunity perspective. More recent research in the social movements field has specifically addressed this need for combining and integrating the insights from opportunity and framing perspectives more systematically (see especially McAdam, McCarthy and Zald 1996, Tarrow 1998, Koopmans and Statham 1999).

If one takes on board, that only perceived realities can affect collective action, then it follows that we should focus on the type of political opportunities that are rendered publicly visible. Such manifest dimensions of political opportunities may be derived directly from the characteristics of political systems. This is clearly the case for the more stable aspects of political culture and institutions, for which the opportunities and constraints have been internalised by the citizenry in a learning process that extends across several generations. Thus French citizens have learnt that they will achieve little if they direct their demands at impotent peripheral authorities instead of at the all-powerful centre in Paris. Similarly, British citizens know that given the country's electoral system, the formation of a new political party is not a very effective means to promote change – an important factor for explaining the national electoral weakness of the British extreme right. However, in addition to the more stable institutional and cultural dimensions that can be derived from political systems, there

are more volatile dimensions of political opportunities, and this is where public discourse dynamics play a crucial role. For example, dissent among a political élite becomes perceived as an opportunity for mobilisation only after it becomes public knowledge, instead of remaining limited to the insider-publics of cabinet meetings, parliamentary committees or other non-public arenas.

When élite dissent enters the public sphere, a process in which the organizational structure of the public sphere and the mass media in particular plays an influential intermediary role, contentious discourses may develop powerful dynamics of amplification, extension and bridging into broader political issue fields. Such political discourse dynamics have potentially more influence over outcomes, when the dispute is transmitted beyond the conflict between the challenger and the elite, and other collective actors in civil society are drawn into taking up a stance, either as ‘third party’ mediators, or alternatively as new protagonists. Under certain conditions, political contentions and their discursive contents can have an influential feedback into shaping the configuration of political power relationships and thereby opportunities (Gamson and Meyer 1996). Political discourse dynamics for a contested issue-field may be seen as constituting a set of discursive opportunities, that determines which of the strategic political demands that are made by movements are more likely to succeed in the public sphere.

The likelihood of success for challengers who attempt to mobilise their claims in the public sphere is dependent on their ability to achieve three strategic aims: visibility, resonance and legitimacy. Firstly, a collective actor and her aims must be rendered publicly visible. Many challenges simply fail, because they do not cross the first hurdle of being reported by the media, or they are able to mobilise only ephemeral or local-level public attention. Secondly, to have an impact the mobilised challenge must provoke public reactions from other actors, i.e., the claims must resonate and carry the contention to a wider public. Even public claims that are reported in the media remain inconsequential if no-one reacts to them, and political business continues as usual. Thirdly, no matter how much visibility and resonance a challenge achieves, it will only

achieve a level of success when it becomes a legitimate contention. This means that an actor needs to legitimate herself and her claims in public, by resonating positively in the reactions of a significant number of other actors, who are willing to declare at least partial support by acknowledging that something has to be done about the problem. Including the discursive dimension extends the institutional focus of the traditional concept of political opportunities, and brings the dynamic cultural and discursive elements of issue-fields back into consideration as variables for shaping collective action. By relating the discursive and institutional dimensions of political opportunities in this way, the indeterminacy of the framing approach is redressed, by giving explanations for why some framing efforts succeed in mobilising a public constituency, whereas others – which are not necessarily less elaborate or consistent in any objective sense – fail to do so.

Conceptualized in this way to include both institutional and discursive aspects, the political opportunity perspective provides a theoretical framework that may be fruitfully applied to link the different perspectives on political contention over migration and ethnic relations which we have discussed above. Importantly, the discussions on citizenship and nationhood that we have discussed in the previous section can be translated into the language of political opportunities and vice versa. One may see conceptions of citizenship and nationhood as a subset, or as a specification of the general dimensions of political opportunity structures, which is particular to the field of contention over migration and ethnic relations.

Conceptions of citizenship and nationhood are first of all part of a nation's cleavage structure. Generally, one may expect greater contestation over issues related to citizenship in countries in which the conception of the nation has historically been a contested issue. This is for instance clearly the case in France, where the dominant republican conception of the nation that emerged from the French Revolution has never been fully accepted by the right. The recent rise of the Front National and the success it has had in challenging French citizenship and immigration politics are therefore no mere accident in French history, but are but the latest manifestations of a

structural cleavage which earlier produced Poujadism, the Dreyfuss controversy and the Boulanger mouvement. In Belgium, the success of the Vlaams Blok cannot be understood without referring to its roots in Flemish nationalism, a cleavage in Belgian politics which long precedes the postwar immigration issue. The contentiousness of immigration and citizenship issues in Germany is similarly linked to the contested nature of German nationhood and the linkage of these issues to controversies over *Vergangenheitsbewältigung*, the ways in which Germany should deal with its past and the lessons it should draw from it.

Second, citizenship also has a formal institutional dimension, which especially affects the opportunities of access of migrants to the political system. In countries such as Britain, where citizenship is easily obtained, migrants have the important advantage of electoral leverage, which puts them in a much better position to influence political decisions than in countries such as Germany where politicians stand to gain little from catering to minority interests. Similarly, migrants and minorities have greater access to the political system where they are officially recognized and their organizations facilitated, and where their claims can refer to existing legal frameworks for equal opportunity, anti-discrimination and cultural rights.

Third, national configurations of citizenship reflect prevailing strategies for dealing with societal cleavages and conflicts. Thus, the Dutch approach to ethnic minority politics has to an important extent been copied from the approach to the resolution of internal religious and political conflicts through 'pillarization' in the early 20th century. In this model, minority organizations were officially recognized by the state and ethnic elites were given an important role in shaping and implementing policies for 'their' constituencies. Similarly, ethnic minorities have been able to claim cultural rights such as state-financed religious schools or broadcasting time in public television by framing their demands in terms referring to the existing provisions and rights for protestant and catholic denominations.

Finally, controversies over citizenship and nationhood are important determinants of the alliance and conflict structures in the politics of migration and ethnic relations. Elite divisions

and shifting alignments over these issues will particularly enhance the opportunities for challengers from below if such controversies are not limited to more or less technical discussions of immigration control and minority integration, but become framed in terms of the 'deep' cultural idioms of citizenship and nationhood.

Of course, this does not mean that every relevant aspect of the political opportunity structure for contention over migration and ethnic relations can be viewed in terms of citizenship and nationhood (e.g., the electoral system or the composition of government are obviously important but unrelated to citizenship). However, it is probably justified to say that cleavages, institutional and legal frameworks, political cultural idioms, and alliance and conflict structures relating to citizenship and nationhood are of paramount importance in this particular field.

GLOBALIZATION, EUROPEAN UNION AND THE NATION-STATE

What we have presented so far is a set of conceptual tools for the comparative analysis of political contention over migration and ethnic relations issues. As we have indicated, such comparisons may be cross-national, longitudinal, or among actors or issues differentially located within the field. In all these cases, however, the nation-state remains the central frame of reference, both institutionally and culturally. The external environment of nation-states may well play an important role in such an approach, but it is likely to be viewed in the traditional international relations fashion as a system of nation-states, which defines particular opportunities and constraints for the actions of each of its constituent parts. Likewise, there is no contradiction between using this kind of political opportunity approach and focusing attention on the local level of politics. Indeed, local variation is what a political opportunity approach would lead us to expect. After all, national political opportunities and constraints are just that, not imperatives that impose a uniform pattern on each regional or local subunit of

the political system. However, such variation is likely to be conceptualized as variation on a – nationally defined – theme, its extent defined by the degree of autonomy given to subnational units within the – more federalist or more centralized – national institutional framework.

Recently, a growing number of authors have argued that such nation-state-centred approaches are obsolete. Associated with the buzzword „globalization“, these critiques claim that we have entered, or are about to enter a new „postnational“ or „transnational“ era characterized on the political level by complex and qualitatively new patterns of „multi-level governance“, in which the nation-state still plays a role, but a drastically reduced one (e.g., Held 1996; Basch et al. 1994; Sassen 1998; Cohen 1999). This decline of the nation-state’s sovereignty is accompanied by a growing importance of supranational and transnational actors, institutions, legal norms, and discourses, on the one hand, and increased local autonomy from national constraints, on the other.

Given the inherently transnational nature of migration and ethnic relations issues, it is not surprising that this critique of national approaches had been particularly prominent in this field of study. A number of authors have seen a new form of „postnational“ citizenship developing, superimposed on national citizenship and rendering it increasingly irrelevant (Soysal 1994; Jacobson 1996). The primary empirical example on which this conclusion is based are the former „guestworkers“ in several Western European countries. Although originally invited on a temporary basis, many of them have stayed after the formal ending of the recruitment programs in the wake of the 1973 Oil Crisis. Moreover, by way of family reunification and formation, immigration from the sending countries has continued, albeit on a lower level. Finally, the receiving countries have extended most civil and social rights, and in some cases even limited political rights to these immigrants, even though many of them have not naturalized and are thus not formally citizens of the countries in which they reside.¹³ Postnationalists argue that such extensions of residence, immigration and other rights to immigrants have been forced on nation-states by their commitments to international law and

conventions, pressure from homeland governments, and the growing normative force of international human rights discourses.

In another and related argument for the relativization of the nation-state, the strong decline in the cost of long-distance international travel and in the speed and extent of global communication are seen as undermining nation-states' attempts to assimilate immigrants to national politics and culture. Instead, immigrants now form „transnational communities“ or „diasporas“ retaining their cultural difference and strong ties with their homelands (Kleger 1997; Lie 1995; Shain and Sherman 1998; Glick-Schiller et al. 1997). As a result, the capacity of the nation-state to regulate migration and ethnic relations is significantly reduced. In a radical formulation of this view – offered in the preface to the first issue of the journal *Diaspora* – nation-states have been reduced to little more than the spatial settings in which global forces materialize: „This vision of a homogeneous nation is now being replaced by a vision of the world as a ‚space‘ continually reshaped by forces – cultural, political, technological, demographic, and above all economic – whose varying intersections in real estate constitute every ‚place‘ as a heterogeneous and disequibrated site of production, appropriation, and consumption, of negotiated identity and affect“ (Tölölyan 1991: 6).¹⁴

More specifically for the European context, the process of European union is often seen as another challenge to the nation state's sovereignty generally, and in the migration and ethnic relations field in particular (e.g., Meehan 1993; Rosas and Antola 1995; Wiener 1997). The emergence of European-level human rights codes, the enhanced role of the European Court of Justice, and the embryonic European citizenship that has been introduced with the Maastricht Treaty are seen as guaranteeing basic migrant rights and thereby limiting the scope of autonomous action of the member states.

Though resonating with the present popularity of „globalization“ and „Europeanization“ in the scientific community, these perspectives have not gone unchallenged. Criticism has focused both on the actual extent of the alleged decline in the nation-state's sovereignty, and

on the degree to which such a shift to a transnational or supranational order actually has the beneficial effects for migrants and ethnic minorities that postnationalists tend to emphasize. To begin with the latter point, it is striking that parallel to the literature emphasizing the empowering effects of postnational and European citizenship, there is an equally resonant literature that comes to the opposite conclusion and sees the process of European union leading to a „Fortress Europe“ (e.g., Roche and van Berkel 1997; Miles and Thränhardt 1995; Overbeek 1995). Pointing to agreements such as those of Schengen and Dublin, the European project is seen here as curtailing migrant and minority rights by strengthening external border controls, promoting internal security co-operation, and devaluating migrant rights to the level of the lowest common denominator of the participating member states. Similar developments can be observed in other contexts of intergovernmental co-operation on migration issues, such as in the case of NAFTA. One has to admire the creativity with which some postnationalists manage to see a subjugation of the nation-state's prerogatives to international human rights codes even in such cases: „Another major effort to come out of the Zacatecas meeting was the facilitation of documented migration and the return of undocumented migrants in full compliance with human rights codes. Finally, both delegations are developing criteria, procedures, and legal conditions consistent with international practices for the safe and orderly repatriation of undocumented Mexican migrants to ports of entry within Mexico without intermediate stops, with full respect for their human rights“ (Sassen 1998: 68).

Moreover, the high hopes for improving migrant rights that some place in European citizenship seem to lack any foundation at the present moment. According to the provisions of the Maastricht treaty, European citizenship is fully derivative of national citizenship in one of the member states and therefore does not improve the rights of third-country nationals in any way. The same is true for the abolition of most barriers in the way of freedom of movement, settlement, and seeking employment within the EU, which applies only to nationals of member states (Hailbronner 1995: 194-198). De facto then, European citizenship and the

rights it entails have so far not improved the rights of migrants from third countries in the slightest sense. On the contrary, while in many national contexts the rights status of permanent residents approximated that of citizens, third-country nationals now find themselves again in a second-class position on the European level (Faist 1995: 192).

Of such improvements in migrant rights that have undeniably taken place in the last few decades, it is debatable whether they are due to the rise of a new, postnational form of citizenship based in international human rights codes, emphasizing personhood instead of citizenship as the basis of rights. First, this perspective cannot explain why such extensions of rights to migrants can only be observed in Western democracies, whereas other countries, such as the Persian Gulf states, extend very few rights, if any at all, to their labour migrants (Joppke 1997). Moreover, more recent labour migration schemes in Western European countries (Germany's import of East European labourers being perhaps the most prominent example) seem to indicate that if they so wish, Western nation-states, too, are well able to restrict the rights of labour migrants to a minimum: „The rights of these, mostly temporary, workers tend to be inferior to that of the former guestworkers in Germany, for example, the rotational principle is strictly enforced. Thus, not only have immigration policies become more restrictive but the social rights status of labour migrants has also become more precarious“ (Faist 1997: 213).

What these examples indicate is that the factors that have led to the extension of rights to immigrants have been domestic rather than postnational in any meaningful sense. First, a commitment to human rights has been a founding principle of Western liberal nation-states, not something imposed on them in the postwar period by supranational institutions, conventions, or discourses (recall that the French revolutionary constitution begins by stating not just the Rights of the Citizen, but the Rights of Man and the Citizen, in that order).¹⁵ While the commitment to such values and rights may partly explain why Western states have not treated their labour migrants like, say, Saudi Arabia or Nigeria, there were also less noble,

domestic interests behind the giving up of the rotation model for Western European guestworkers, e.g., the pressure on governments by employers interested in a stable, committed workforce (Freeman 1995; Lakeman 1999).¹⁶

Empirical evidence on the mobilization of migrants and ethnic minorities in Europe does not provide much support for a significant erosion of the nation-state as a frame of reference. In our own contribution to this volume, we show that only a very small proportion of migrant and ethnic minority claims-making in Britain and Germany in the 1990s involved the supranational level in some way, either in the form of transnational minority organizations, demands directed at supranational institutions, or the legitimation of claims by referring to (existing or proposed) international legal frameworks, conventions or treaties. Most of minority claims-making remained firmly within a national framework, either that of the country of residence or that of the country of origin. The latter type of homeland-related demands might be interpreted within the transnational communities or diaspora perspective. However, homeland issues played a significant role only in Germany, not in Britain, which can be plausibly related to differences in these two countries' national citizenship regimes, not to a greater exposure of Germany to transnationalization processes. Moreover, there does not seem to be anything new about such „transnational“ action by political exiles against authoritarian homeland regimes.

The fledgling attempts that have been made to institutionalize something of a migrant and minority representation on the level of the European Union are not indicative of a strong and irresistible postnational thrust, either. As Cathie Lloyd describes in her contribution to this volume, most attempts at organization at the European level have been failures (see also Favell and Geddes in this volume). This has not been because of a lack of co-operativeness from the side of the EU – in fact most of these efforts would not have lived a day without the generous financial assistance of the Commission. Both the European Migrants' Forum and attempts to set up a European anti-racist network failed because of internal controversies

along national lines – national lines, it should be emphasized, referring to the participating migrant organizations' countries of residence, not to their ethnic homelands.¹⁷ This is in line with Ireland's (1994) finding from his French-Swiss comparison, in which he demonstrates that the patterns of political participation of Turks in France tend to resemble those of Italians in France more than those of Turks in Switzerland, who in turn resemble Italians in Switzerland.

The EU's weak development as a forum of political contention, not only in the immigration field but more generally, is hardly surprising given the weakness of representative institutions such as the European parliament and the predominance of intergovernmental forms of decision-making such as the Council of Ministers. In this constellation, nation-states remain the central actors and the principal addressees of demands from civil society organizations. Only nation-state representatives have both the capacity to advance such societal interests, and can be held accountable if they do not adequately do so, regardless of whether this requires state action on the national or EU level. A simple look at the resources at the EU's disposal may serve to further underline its weakness and dependence on the constituting nation-states. In 1991, total EU expenditures amounted to 53 billion ECU, i.e., a mere one percent of the total GDP of the member states. Moreover, no less than 64 percent of these expenditures were on the Common Agricultural Policy, a policy field no one would claim to be at the forefront of a postnational challenge to the nation-state (Maraveyas 1996: 116). In addition, the few resources that the EU has at its disposal do not derive from independent tax revenue, but from contributions of the member states, which are always contestable and never unconditional. In that sense, in as far as the EU resembles a polity, it is one controlled by fifteen extremely rich taxpayers, who pretty much decide amongst themselves how much they want to pay and what they expect in return (an agricultural subsidy here, subvention for an „underdeveloped“ region there).

Although there is so far even in the European case little indication of an important shift of the locus of power and political contention from the nation-state to the supranational level, it cannot be maintained either that nothing has changed in the role and influence of the nation-state. In the face of the increased transnationalization and mobility of capital, nation-states have lost much of their regulatory capacity in the economic sphere. This obviously has also affected their capacities to maintain extensive nationally-defined welfare state programs. In the cultural sphere, too, the recent exponential increase in world-wide communication and cultural diffusion have made it virtually impossible for nation-states to maintain a distinguishable, „national“ politics of culture, information, and communication – the French seemingly fight a rearguard battle here.

To understand how this fits with the continuing importance of the nation-state as a locus of political contention, we should distinguish between the nation-state's sovereignty and its capacity for autonomous action:

„... the concept of ‚sovereignty‘ is usually taken to mean that a nation state has power and control over its own future: that it has, in other words, the ability to take final decisions and to make and enforce the law in a given community or territory. A loss of sovereignty implies a loss of legal and actual control over the determination of the direction of national policy. Sovereignty must be distinguished from ‚autonomy.‘ The idea of autonomy refers to the capacity of nation states, not to set goals, but to achieve goals and policies once they have been set, because in an interdependent world all instruments of national policy may be less effective. It is a diminution of the capacity to achieve national policies – a loss of national autonomy – which may alone be behind the anxieties about a loss of ‚sovereignty.‘ The question to pose is: has sovereignty remained intact while the autonomy of the state has diminished, or has the modern state actually faced a loss of sovereignty?“ (Held 1996: 407).

The answer to Held's question is, we suggest, that in spite of the decline in its autonomous capacity to act, the nation-state still is by far the most important locus of sovereignty. The loss of regulatory capacity of nation-states as a result of processes of globalization has not been compensated at the supranational level. Thus, Streeck and Schmitter describe the process of European union as „‘negative integration’ through preemption of national regulatory regimes without a simultaneous supranational restoration of regulatory capacity“ (1996: 185). It is important to note that such „deregulation“ is not something imposed on nation-states, but is actively promoted by them in an effort to further economic globalization (Sassen 1998: 54).

This may be the main paradox of our present situation: that the nation-state's capacities are eroding, but that there is nothing that can credibly fill the void, or at least not yet. As a result of the nation state's erosion, many people experience a loss of identity and of control over their destinies. But simultaneously there is nothing beyond the nation-state (except perhaps local communities and identities) that can serve as a new anchor for collective identities and can renew the sense of control. However eroded it may already be in an absolute sense, compared to its local and supranational „competitors“, the nation-state is in a relative sense still by far the most important source of sovereignty and collective identity. It is therefore that our age of globalization is also a time of nationalism, of ethnic mobilization, of the rise of xenophobic movements and of a proliferation of new nation-states with newly invented national histories, anthems, flags, and languages – unfortunately also accompanied by a series of atrocities in the name of the „national“ cause that has few historical precedents.¹⁸ As the single force to give at least some counterplay against the impersonal forces of globalization, many turn to the nation-state and the national community as havens in a heartless world.

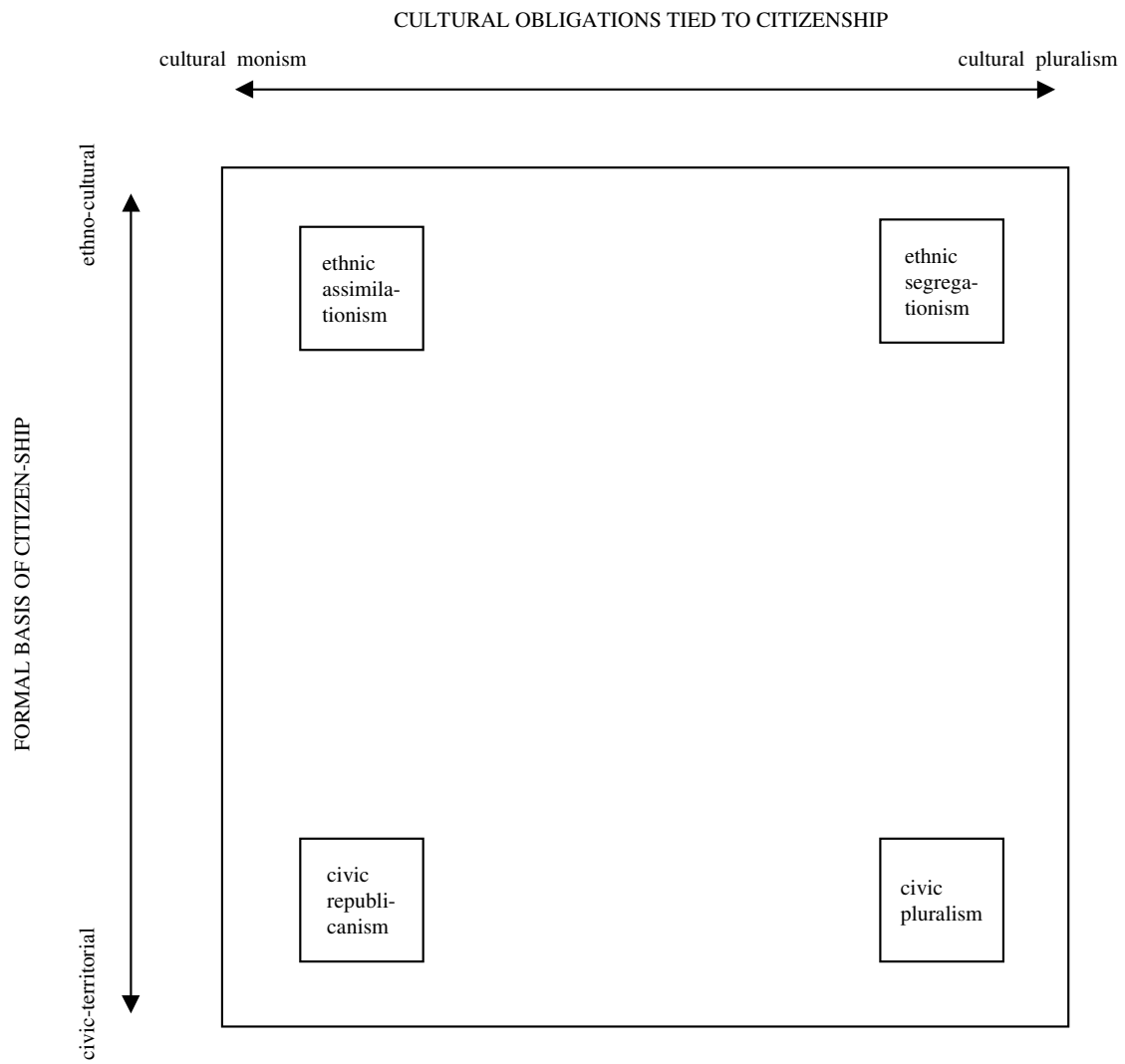
In the context of Western countries, issues such as immigration and minority integration are particularly well suited to such attempts to reinvigorate the nation-state. Precisely because it seems futile (and in many respects clearly disadvantageous) to try to stem the tide of economic globalization, those policy fields where the nation-state still has pretty much

retained its capacity to act become the focus of such reinvigoration attempts¹⁹: „The control of entry becomes one of the few domains in which states can still be strong – ‚renationalizing‘ immigration policies as antidote to the ‚denationalizing‘ logic of globalization“ (Joppke 1998: 3). The same can be said in the cultural realm of minority integration politics. As a macro force, cultural globalization seems unstoppable, and because of its many advantages also irresistible – after all, who wants to miss Hollywood, ethnic restaurants, and holidays in the sun? However, its manifestations in everyday life in Western cities in the form of women wearing headscarfs, mosques, black people, or „strange“ cooking smells, seem within people’s and nation-states‘ reach of control and have for many people become the focus for everything they dislike about our global age.

We may conclude, then, that so far there is little reason to drop the nation-state as a central unit of analysis in studies of immigration and ethnic relations. Of course, it is possible that the process of European unification will in the future lead to real transfers of sovereignty, accountability, and collective identity from the national to the supranational level, although the increasing heterogeneity of the Union as a result of the upcoming admission of a series of new members seems to work against this scenario. However, the usefulness of the conceptual framework we have proposed here does not depend on whether or not the nation-state will in the future lose its pivotal role in migration and ethnic relations politics. On the contrary, the conceptual framework of the political opportunity structure approach seems well-equipped to deal with situations of so-called "multi-level governance", just as it is helpful in analyzing the multi-level dynamics of federal states such as Switzerland. Moreover, the dilemmas that nation-states have faced in regulating migration and integrating migrants will not dissolve in the face of the emergence of a European polity. Such a Europe, too, will have to develop rules and discursive legitimation for who gets access to its territory, who can become a member of its political community, and how it will deal with cultural diversity and demands for special group rights. These are fundamental dilemmas any form of political regulation of migration

and ethnic relations will have to deal with – they do not arise from specific deficiencies of the nation-state that will magically disappear with the arrival of some form of "postnationalism".

FIGURE 1. A Two-dimensional Space for Situating Conceptions of Citizenship



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Social Forces, 44: 327-41.

NOTES

1. Obviously the time dimension here is different for different countries. In Britain, the migrations field developed earlier than in other European countries, in response to its early definition as a central political problem and also considerable state funding. In countries such as Italy, with a later trajectory of migration and politicisation, there is still relatively little research that deals with migration as anything other than a policy issue. Our aim here is to pick out general trends of development.
2. Kriesi et al. (1995: 37) similarly combine formal institutional and political-cultural dimensions in their analysis of new social movements.
3. There are a few examples, though, which come pretty close to this extreme, e.g., Israel, or until recently Estonia.
4. Even Brubaker (1999) now seems to share this view, and in doing so departs radically from his earlier position.
5. In the early stages of the guestworker programs, migrant children were often even in completely separate school classes. Ironically, multiculturalism sometimes unintentionally leads to a very similar outcome (e.g., the phenomenon of "black schools" in the Netherlands discussed in Thränhardt's contribution to this volume).
6. At first sight, the term "ethnic assimilationism" may seem contradictory, at least if one sees "ethnicity" as an objective category based on blood ties into which one can only be born, and not assimilated to. However, ever since Weber, the dominant sociological view of ethnicity has emphasized the constructed, "imagined" (Gellner 1983) character of ethnic community: "Wir wollen solche Menschengruppen, welche einen subjektiven Glauben an eine Abstammungsgemeinschaft hegen, derart, daß dieser für die Propagierung von Vergemeinschaftungen wichtig wird, dann, wenn sie nicht 'Sippen' darstellen, 'ethnische'

Gruppen nennen, ganz einerlei, ob eine Blutsgemeinsamkeit objektiv vorliegt oder nicht“ (Weber, *Wirtschaft und Gesellschaft* 2. Teil, Kapitel IV, § 2).

7. The ultimate end of the extreme right may well be ethnic segregationism or even simply throwing immigrants out of the country. However, that is not the kind of discourse with which one can win elections in France. The insistence on cultural assimilation as a precondition to citizenship is much more resonant.
8. The restrictions to the *jus soli* that this law entailed were largely turned back again by the Socialists in 199X.
9. The British case seems less extreme, which is probably related to the much more limited version of multiculturalism that characterizes this country. British "multiculturalism" is rather superficial in that it refers mainly to an attitude of tolerance and respect for cultural diversity in the phenotypical (i.e., as an extension of "racial") sense, and to a much more limited extent than in the Netherlands to special rights for cultural groups. Thus, although representatives of the British race relations industry like to present Britain as Europe's multicultural example *par excellence*, British Muslims do not nearly have the same rights as their Dutch counterparts (e.g., to have their own, state-funded schools).
10. There are of course many other relevant classes of actors, which we cannot all discuss here. Here we want to at least mention that the conceptual map can also be helpful to place regions or cities relative to each other, or relative to the national level of the polity.
11. The part of Yasemin Soysal's (1994) work that compares different national 'incorporation regimes' uses a very similar approach and makes very much the same point. This part of her work stands in odd contrast to her 'postnational citizenship' thesis in the same book, which claims that the nation-state and national citizenship have become largely irrelevant in defining migrant rights and opportunities for participation (see below).
12. This concept has sometimes been referred to explicitly by neo-institutionalist scholars (e.g., Ireland 1994), but in a vague way to generally point out the importance of the political context.
13. Hammar (1985) has coined the term "denizens" to capture the particular status of these permanently resident non-citizens.

14. In a similar vein, Jacobson argues that “(t)he state is becoming öess a sovereign agent and more an institutional forum of a larger international and constitutional order based on human rights.”
15. Saskia Sassen is not convinced by this argument: 70: „Even where rooted in the founding documents of nation-states, as is the case with the United States and France, we need to understand the specific development of these rights over the last few years. Human rights today are a force that can undermine the exclusive authority of the state over its nationals and thereby contribute to transform the interstate system and international legal order ... Human rights codes can erode some of the legitimacy of the state if it fails to respect such human rights – it is no longer just a question of national self-determination. This is a very significant shift.“ This argument seems to be based on the idea that there was a time when nation-states could do with their citizens and residents whatever they wanted and that this is no longer true. The truth is, of course, that some nation-states have always been limited in what they could (or would) do with the persons on their territory – that is why we call them “liberal”, “democratic”, or “states under the rule of law.” Conversely, other states such as China – who are apparently ignorant of the fact that a very significant shift has occurred – continue to ignore such principles and are allowed to do pretty much whatever they like with their subjects.
16. As Joppke argues, the differential extent to which notions of human rights have been formally encoded in national constitutional law may also play a role in explaining differences among Western states: „Britain showed how far a state with weak domestic human rights constraints can go in shielding itself from unwanted migrations. Britain is the one case that approximates the picture of a domestic state confronted with international human rights norms. Alas, it is also the case that demonstrates the impotence of such external norms if not backed by a domestic bill of rights and independent courts“ (1997: 294).
17. Streeck and Schmitter make a similar observation regarding the attempts of labour movements to organize at the European level (1996: 175-176).
18. Eric Hobsbawm, reflecting on regionalist movements in Britain in 1977, probably did not realize how close he was to the mark when he wrote that „(t)he United Nations Organization ... is soon

likely to consist of the late 20th century equivalents of Saxe-Coburg-Gotha and Schwarzberg-Sondershausen.“ (cited in Nairn 1996: 272).

19. Generally, these are policy fields that do not (like the classical welfare-state related issues) depend heavily on the state's (eroded) extractive capacity, but that are relatively resource-extensive and symbolically intensive. On the left side of the political spectrum they include issues such as the environment, women's emancipation, as well as ethnic and other identity politics. On the right, they include moral issues such as abortion and the role of the family, as well as crime and immigration control.