

**How national citizenship shapes transnationalism:
A comparative analysis of migrant claims-making in Germany,
Great Britain and the Netherlands**

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Ruud Koopmans

Department Political Communication and Mobilization
Wissenschaftszentrum Berlin für Sozialforschung (WZB)

ruud@medea.wz-berlin.de

and

Paul Statham

Centre for European Political Communication (EurPolCom)
Institute of Communication Studies, University of Leeds

paul@ics-server.novell.leeds.ac.uk

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Introduction

In general studies of globalization, as well as in the more specific literature on transnational migration, the nation-state and national citizenship are not exactly *en vogue*. Anything beyond ('postnationalism'), below ('the local', 'devolution'), above ('global discourses', 'supranational institutions'), between ('transnational communities'), or circumventing ('glocalism', 'global cities') nation-states has the warm attention of the academic community. By contrast, the nation-state, if not ignored altogether, usually appears attached to prefixes such as 'post-', 'trans-' and 'supra-' suggesting its actual or upcoming demise. We do not want to deny that the (actual or potential) new trends that are addressed by these strands of research do not deserve attention. To some extent it is moreover legitimate to pay more attention to what is new than to that which remains the same.

What we take issue with, is the tendency in the literature to rely on one-sided and often unsystematic evidence for supposed new trends that undermine the nation-state. It is not difficult at all to find examples that fit postnational, transnational and other alternatives to the nation-state centered model. However, it is not warranted to derive far-ranging claims about the future of the nation-state or a fundamental transformation of global politics from such examples as long as we do not know how representative they are. Only theoretical and empirical approaches that do not relegate the nation-state to the domain of insignificance *a priori* can tell us something about the comparative extent of new trends, but equally important perhaps, only they can show us how the nation-state *interacts* with globalization. Even staunch postnationalists tend to admit that the global to an important extent manifests itself within the nation-state, and that nation-states are important actors promoting and shaping globalization and supranationalization on the international scene.

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If there still are important differences among nation-states – which some authors contest – it follows that we may find global trends such as increased transnational migration, trade and communication or the growing role of supranational institutions such as the UN or the EU, processed very differently by individual nation-states and resulting in diverging outcomes. In other words, although there can be little doubt that globalization affects the nation-state, it cannot be assumed *a priori* that the nation-state becomes any less important, nor that cross-national differences become necessarily homogenized.

In this paper, we want to focus on one particular development in the migration field that is said to challenge the nation-state, namely the formation of transnational communities and diasporas. We will deal in particular with the public dimension of transnationalism by focusing on the claims-making and participation of ethnic minorities of migrant origin in the public sphere. This is arguably one of the most important aspects of transnationalism in that it involves an interpenetration of the public spheres and the political identities, organizations, issues, and conflicts of the sending country and the country of settlement, with potentially important consequences for both polities. It should however be clear from the start that our analysis will not allow us to say much about other forms of transnationalism, such as networks of reciprocity among family members and co-villagers, or business connections between the country of settlement and the homeland. Our analysis and data will allow us, however, to gauge the extent to which such transnational ties extend beyond the private or market spheres, become publicly contested and politicized, and affect the behavior and identities of migrants and ethnic minorities as citizens in the public sphere. A second limitation of our analysis which we have to mention from the start is that we focus on the transformations transnationalism may bring about in the country of settlement. Our data do not speak to the extent and forms in which transnationalism transforms the public spheres and political processes of the sending countries, which may well be different from its impact on the country of settlement.²

In an attempt to avoid the pitfall of studying transnationalism by looking only at examples of transnationalism, we place our analysis in a systematic comparative framework.³ First, we put (different forms of) transnational claims-making into perspective by comparing them to such claims-making by migrants which is fully embedded within the national context of the country of settlement. Second, we compare transnational claims-making across three

² Among other things, this relative impact will depend on numbers and resources. Small countries (e.g., in the Caribbean) with weak domestic economies and which have sent relatively large numbers of migrants abroad, will be strongly affected by transnational economic, cultural and political flows.

³ The need for more comparative work on transnationalism has been forcefully emphasized by Guarnizo and Smith (1998: 27-28).

countries, Germany, Great Britain and the Netherlands, which display considerable variation in citizenship and migrant integration approaches. This allows us to see if, and how the extent and forms of transnationalism vary as a result of different national political opportunity structures for migrant claims-making. In order to control for the possibility that such cross-national differences as we may find are caused by differences among ethnic groups rather than by national opportunity structures, we, thirdly, compare similar migrant groups in different national settings, as well as different migrant groups within the same national setting.

Before moving to our analysis of transnational claims-making, we will first, in the next section, briefly discuss some of our earlier results regarding two other theoretical issues in the migration field, which are often linked to the concept of transnational communities. These are the claim of an emerging 'postnational' membership of migrants that renders national citizenship largely irrelevant, on the one hand, and the claim that migrants increasingly claim 'multicultural' group rights, on the other.

Postnational membership and multicultural claims: some earlier findings

A number of authors have identified the emergence of a new form of 'postnational' citizenship or membership whereby rights now extend across borders, and supranational institutions and global legitimating discourses, have superimposed their authority over the nation-state with the effect of rendering national citizenship increasingly irrelevant as a source of rights to migrants (Jacobson 1996; Soysal 1994; Sassen 1998). In the European context, the postnational argument draws on the empirical case of the experience of guestworkers, many of whom stayed on and brought their families over after recruitment programs ground to a halt and restrictive immigration controls became the Western European norm. Although most former guestworkers did not take up national citizenship in the receiving country, they nonetheless over time came to enjoy many of the same civil and social, though not political, rights as full national citizens (Bauböck 1994). Postnationalists have taken the existence of these rights given to non-citizens as proof of the erosion of national citizenship as the main source of rights. They argue that migrants no longer even need to naturalize to the receiving country, but can successfully sustain their claims to residence and welfare by referring to universal rights of 'personhood' that have superceded national citizenship as the guarantor of migrant rights. The link of this argument to the discussion on transnationalism is that

postnational rights obviously make it easier for migrants to move in transnational spaces: the more their rights are guaranteed and legitimated on the global level, and the less they depend on belonging to a particular nation, then the more freely migrants can move in between national contexts without the risk of losing claims to rights and entitlements.

The postnational argument has not gone uncontested. Important counterarguments are that (a) the codification and enforcement of supranational rights has not gone nearly as far as postnationalists claim (e.g., Guild 2001)⁴; (b) human rights are not something that has been imposed from the outside on nation-states, but they originate in the constitutions of liberal democracies themselves (Joppke 1998); (c) supranational regulation in the migration field far from automatically implies a strengthening of migrants' rights, e.g., the EU's Schengen and Dublin, which aim at co-ordinating border controls and exchanging information on illegal immigrants and asylum seekers; and (d) even if there is some truth in postnationalists' argument that citizenship today is first and foremost about identity, the symbolic inclusion or exclusion of migrants through citizenship may have important material consequences, including the (de-)legitimation of xenophobia and the (un-)marking of groups for discrimination and racism (Koopmans 1999a).

Ultimately, however, the dispute over postnational membership rights needs to be settled empirically. In an earlier paper (Koopmans and Statham 1999a) we have examined the validity of the postnational thesis examining data on claims-making by migrants and minorities in Germany and Great Britain. We have found little, if any, support for the postnational thesis, according to which one would expect migrants to – not exclusively, but certainly to a substantial extent – organize supra- and transnationally, to direct demands at supranational actors and institutions, or to make claims on the nation-state referring to supranational rights, conventions and discourses. Only at most a few percent of all migrant and minority claims in both countries displayed such characteristics. Particularly the European Union, often championed as a prime example by postnationalists, was almost completely absent as an arena for migrant organizing or the addressing or framing of their demands (see also Favell and Geddes 2000).

In her version of the postnational argument, Soysal (2000) claims that postnational conventions and discourses provide an important legitimating framework for migrant claims to retain their own cultural identity. Thus, she links up with the second theoretical issue that we briefly want to discuss, namely that of multicultural rights. This perspective asserts that

⁴ E.g., what did postnational guestworker rights count for, where was the power of international conventions and discourses when the Bavarian government expelled a fourteen year-old German-born boy of Turkish origin 'back to Turkey' and thus separated him from his parents who lived in Germany since thirty years?

recent waves of non-European migration – and Muslims in particular – have created strong pressures for granting migrants special rights, or exemptions from duties on the basis of their cultural and religious difference from the rest of society. Thus, migration undercuts the vision of a unitary citizenship on the basis of equal individual rights on which the liberal nation-state rests⁵ – a development which is alternatively seen as a necessary correction to ‘white’ cultural hegemony, or as a threat to social cohesion and solidarity. For understanding transnationalism, multicultural rights are important because they imply a weakening of nation-states’ claims on migrants to assimilate to the national culture and of pressures to sever ties to their countries and cultures of origin.

Often-cited examples of such multicultural challenges by migrant groups are the French *foulard* and British Rushdie cases, but again, to what extent such spectacular cases are representative remains unclear. Our comparative analysis of migrant claims-making in Germany and Great Britain revealed that, although both countries have about equally important Muslim populations, claims for multicultural group rights were almost absent in Germany, but played an important role in Britain. We argued that this difference must be explained by the availability of an extensive race relations and anti-discrimination framework in the latter country, which moreover officially defines itself as a ‘multicultural society’. This provides opportunities for claims to rights for migrants in general, and for cultural rights in particular. In Germany, by contrast, migrants are excluded as ‘foreigners’ from the political community and also in other respects have few channels of access to make claims on the state or on other actors, such as employers. This suggests that pressures for multicultural rights depend at least partly on conceptions of citizenship and national identity in a particular setting and are not a quasi-automatic consequence of the cultural difference of today’s migrants.

Theoretical perspectives on transnational communities and diasporas

Arguments about the emergence of transnational communities and diasporas are often underpinned by referring to postnational rights that enable migrants to move more freely, on the one hand, and to a growing acceptance of receiving states for multicultural difference which allows migrants to retain strong ties to their countries of origin, on the other. However,

⁵ Whether this is a very realistic depiction of the typical nation-state in its pristine state is debatable. Group rights in the form of federal and corporatist arrangements or the preferential treatment of particular (state) religions can be found in many, if not most nation-states. A sizeable proportion of ‘multicultural’ claims by migrants consist of little else than the demand to apply such group rights equally to all groups, e.g., to give Muslims the right to their own schools when Christian or Jewish denominations also have such rights.

the transnational communities argument is not reducible to the effects of postnationalism plus multiculturalism. In particular, increasingly globalised capital accumulation and transfer, the increasing speed of communications, and the affordability of long distance travel have been identified as structural developments that favor the emergence of transnational communities and diasporas. Transnational migrants, according to this view, are able to use these facilities to a greater degree than ever before to establish ties that transcend national boundaries, and by crossing and recrossing them physically, electronically and financially, they increasingly produce a transnational social, cultural, political and economic world. Transnational migrants do not leave their origins and pasts behind, they take them with them, and by maintaining their networks, they begin to act as conduits between the two or more nations where they have connections. The transnational communities approach is often based on the findings of ethnographic and anthropological studies of migrant behavior which observe the increasing political, social, cultural and economic stakes that these groups have in several places across the globe, and the hybrid forms of identity which they use both in relation to their homelands, countries of settlement, and scattered kith and kin (Basch, Glick Schiller, Szanton Blanc 1994, Portes 1998, Portes et al. 1999). In this view, then, it is not so much the transformation of the basis of citizenship which is eroding the capacity of nation-states to politically shape migrants in their national image, but the de facto behaviour of migrants.

The concept of transnationalism is sometimes used so broadly as to encompass migration and immigrants per se. However, in a more meaningful and widely accepted definition, transnationalism consists of:

the processes by which immigrants forge and sustain multi-stranded social relations that link together their societies of origin and settlement. We call these processes transnationalism to emphasise that many immigrants today build social fields that cross geographic, cultural, and political borders. An essential element is the multiplicity of involvements that transmigrants sustain in both home and host societies (Basch et al. 1994: 6).

This includes phenomena as diverse as import/export immigrant businesses, investments by migrants in the country of origin, sustained links among family members and co-villagers in the countries of origin and settlement, homeland-based cultural and religious organizations that set up branches in the country of settlement, as well as the mobilization of migrants by homeland political parties and social movements or the diffusion of homeland-based conflicts to the migrant community abroad. The defining characteristic of transnationalism in this

sense, are sustained relations between one or more countries of settlement and a country or region of origin. Thus, the presence of ethnic minorities of migrant origin does not in itself constitute transnationalism, if these groups do not maintain significant and sustained interactions with their homelands. Religious belonging as such cannot be considered transnationalism, either, unless a religion is tied to one specific ethnic group from a specific origin, as is the case for Jews and Sikhs. Although some authors talk about ‘transnational religious membership’ (e.g. Levitt forthcoming), including Catholicism and Islam, this stretches the transnational communities concept so much that it becomes useless for analyzing the impacts of migration in the modern world. As Vertovec (2001: 11) argues, the great religions are ‘world traditions that span many ethnic groups and nationalities that have been spread by many other means than migration and displacement’.

The revived concept of diaspora likewise is often used in an excessively loose way, as in Marienstras’ definition as ‘any community that has emigrated whose numbers make it visible in the host community’ (1989: 125). Used more precisely, diaspora denotes a particular kind of transnational community that originates in massive emigration and dispersal – forced or at least propelled by considerable distress – of a group from a homeland to two or more other countries (Van Hear 1998). Compared to other types of transnational community, diasporas tend thus to be characterized by a strong orientation towards the homeland, coupled with a longing to return once the homeland has been achieved, or independence restored, or its present regime has been overthrown. Beyond the classical template of the Jewish diaspora, examples include the Armenians, Palestinians, Tibetans, Kurds, Tamils or Mollucans, as well as regime opponents from Iran, Afghanistan or Cuba.⁶ Given the preoccupation of diasporas with nation (re)building, it should not come as a surprise that hard-core postnationalists such as Soysal cannot mobilize warm feelings for the concept:

The category of diaspora is an extension of the nation-state model, in that it assumes a congruence between a territorial state and the national community, and by implication a congruence between territory, culture and identity ... Focusing peculiarly on the ethnic axis of homelands and abroad, the theories of diaspora overlook the transgressions of national boundaries and collectives and forget the new ways by which immigrants experience and enact their membership (2000: 3, 10-11).

Some approaches to transnationalism in the more general sense likewise acknowledge the persistence of an international world order run by nation-states (e.g., Rex 1996, Castles 2000).

Indeed transnationalism may even become a way for nation-states to extend their international influence. Receiving states may come to see resident migrants as important opportunities and conduits for establishing links with the sending country and seek to further secure their allegiance by reducing the criteria for naturalisation. Conversely, sending states may loosen their direct claims of allegiance on emigrants – for example, by accepting dual citizenship – as a way of establishing a bulkhead in a wealthier receiving state, with the aim of stimulating a continued flow of economic resources and political connections from the centre to the periphery (Freeman and Oegelman 1998).

Against this view, another set of authors condemn the institutional framework of the nation-state to the dustbin of history. They define the particularist group identity claims of minorities and migrants as the important driving force in the creation of a new world order populated by unlimited numbers of ‘diasporas’ – in the loosest sense of the word – who celebrate their ethnicity at the gates of postmodernity (e.g. Tölöyan 1996). In a less cultural studies vein, others have made similar claims about ‘diasporas’ challenging the nation-state (e.g. Cohen 1997, Vertovec 2001). Against the globalization trends propelled ‘from above’ by transnational capitalism and nation-states’ efforts at supranational (de)regulation, several authors see migrant communities as a counterforce of ‘transnationalism from below’ (e.g. Portes 1997, Basch et al. 1994, Smith 2001). Ultimately, such ‘transnationalism from below’ processes are often defined as acts of resistance and appropriation that occur in the face of global capital accumulation, whereby transnational migrants acquire a privileged political status as a group with resources to resist the onslaught of global capitalism.

A theoretical framework for understanding transnational claims-making

In line with the perspective advocated in the introduction to the volume where a revised version of this paper is due to appear (Joppke and Moravska forthcoming), we argue for an intermediate position that sees transnationalism neither as a mere auxiliary to, nor as a gravedigger of the nation-state world order. We endorse Guarnizo and Smith’s (1998: 12-13) criticism of the idea of transmigrants as unbounded actors:

we wish to underline the actual mooring, and, thus, boundedness of transnationalism by the opportunities and constraints found in particular locations where transnational

⁶ Strictly speaking, the Mollucan and Cuban examples do not completely fit the definition since these groups are

practices occur the fit between specific kinds of migrants and specific local and national contexts abroad shapes not only the likelihood of generating, maintaining or forsaking transnational ties, but also the very nature of the ties that migrants can forge with their place of origin.

In contrast to the polemical opposition of national citizenship and national approaches to migrant integration, on the one hand, and an unbounded transnationalism, on the other, this perspective focuses our attention on the *interaction* between the two. In particular, we propose to investigate how the extent and forms of transnational and diasporic claims-making are affected by the political opportunities and constraints set by the specific citizenship and integration regimes of Germany, Great Britain, and the Netherlands. Much may depend, in addition, on the specific triadic relation between migrants, their homelands, and the country of settlement, whether migration has been enforced by political oppression, occurred willingly as guestworkers for economic betterment, or was shaped in part by colonial allegiance and a past adherence to an empire that spanned several continents. In addition, characteristics of the migrating group and their attachment to a particular religion or to specific political aspirations and ideologies may play a role. As a result of such factors, some migrant groups may fit the ideal type of a transnational community more closely than others.

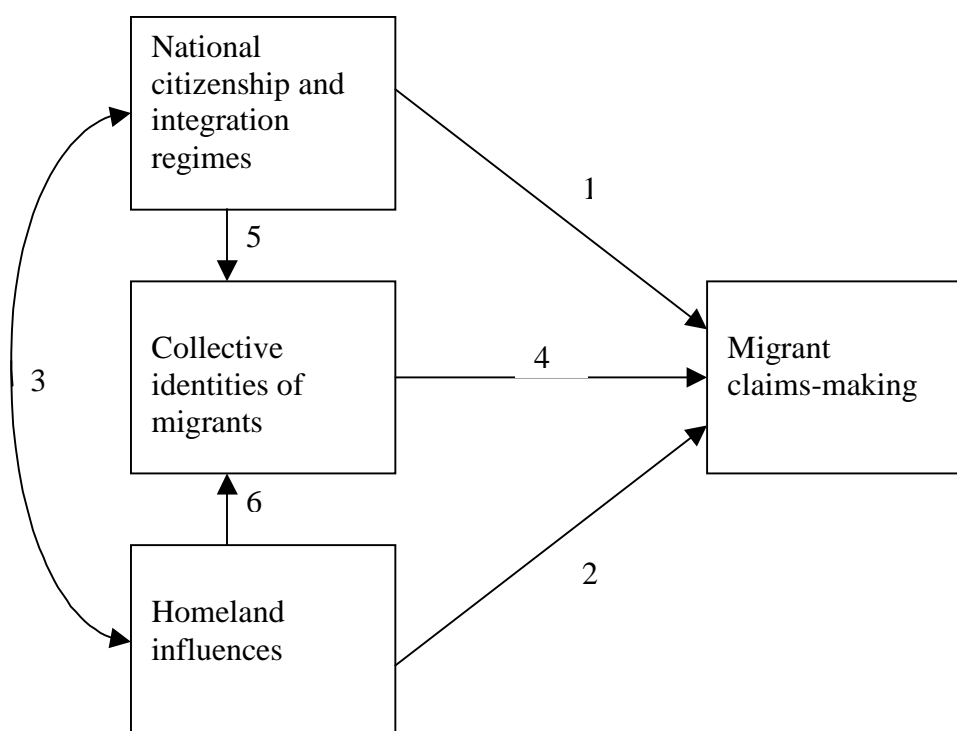
The basic features of the theoretical model which we want to follow for analyzing the claims-making of migrant communities is depicted in Figure 1. Following the triadic conceptualization of transnationalism, we see migrant claims-making determined by the interplay of three factors. First, we expect the opportunities and constraints set by national citizenship regimes and integration models to influence the type of migrant claims-making (arrow 1). Generally speaking, we expect migrants to be more inclined to make claims regarding their situation in the country of settlement where the state provides opportunities for them and their organizations to do so. Perhaps the most important factor here is whether migrants have the right to vote (which largely depends on them holding citizenship), but in addition such factors as the existence of equal opportunity and anti-discrimination legislation, state subvention and consultation of migrant organizations, or the availability of cultural group rights in domains such as education and the media will play a role. We will elaborate these factors in the next section.

For now, we turn to the second determinant of migrant claims-making in Figure 1, which we have broadly labeled as ‘homeland influences’ (arrow 2). As a corollary to

largely concentrated in just one receiving state, the Netherlands and the USA, respectively.

citizenship and integration regimes on the country of settlement side, this includes the sending country's policies with regard to its emigrants. While some sending countries stimulate their (former) subjects to assimilate to the host society, most have an interest in retaining their emigrants' allegiance, if only in order not to lose the yearly inflow of remittances on which many sending countries' economies heavily depend. One such instrument is not allowing the loss of the sending countries' citizenship or making such loss costly to migrants (e.g., when they lose inheritance or land ownership rights), another is the direct control over emigrants by way of sending-state or sending-state-sponsored organizations in the country of settlement, such as the branches of the Turkish Ministry of Religion or the Maghrebian Amicales in many West European countries.

Figure 1: Theoretical framework for the analysis of migrant claims-making



Further, the category of homeland influences includes the actual political situation in migrants' country of origin. It may be expected, for instance, that independence struggles of ethnic groups (e.g., of the Kurds and Tamils), other intra-ethnic conflicts (e.g., among Muslims, Hindus, and Sikhs in India), foreign occupation (e.g., Palestine, Tibet), civil war (e.g. Algeria, Bosnia), or oppressive dictatorships in the country of origin (e.g., China, Iran) provide fuel for homeland-directed claims-making among 'diaspora' communities of migrants from these countries. Apart from the direct 'pull' such homeland conflicts exert on migrants,

such conflicts have often also been the ‘push’ factor behind the flight or exile of politically active migrants. Thus, migrant communities from countries with a high level of internal political strife or oppression often harbour a disproportionate number of ideologically, ethnically or religiously ‘conscious’ members, who hold a diasporic identity and wish to remain involved in the homeland ‘struggle’ from a (safer) distance.

If both sending and receiving country share an interest in retaining migrants’ ties to their homelands, the activities of sending-country organizations in the country of settlement may be institutionally sponsored by both. Thus, the Bavarian and Turkish governments have together set up Turkish-Islamic classes in Bavarian public schools for ‘guestworker’ children, which are given in the Turkish language by teachers sent over by the Turkish Ministry of Religion. This is one example of the ways in which the relation between the country of settlement and the sending country may influence both sides’ policies with regard to immigrants or emigrants, respectively (arrow 3 in Figure 1). The Bavarian example illustrates the guestworker type of relationship, which was usually based on bilateral agreements and based on the – as it turned out – flawed idea of temporary labor migration. A second important type of relationship is that between former imperial powers and their former or remaining colonies. Migrants from former colonies often enjoy – at least for a transitional period after independence – a right to citizenship in the ‘mother’ country, or, in some other cases (e.g., Spain vis-à-vis its former South American possessions), can obtain citizenship more easily. In addition, of course, there are important pre-existing cultural linkages, most importantly the fact that many colonial migrants already know the language, which may make it easier for migrants to integrate into the host society. The other side of the coin is that the legacy of colonialism may also include deep-seated racism and paternalism with regard to former colonial subjects, which may counterbalance the integrative effects of cultural linkages. A final crucial type of sending-receiving country relationship in the European context is the case of intra-EU migration. Migrants from other EU countries nowadays hold largely similar rights (e.g., freedom of movement and access to the labor market) as native citizens of a member state and are in many respects – not least of all in public discourse – privileged vis-à-vis less well-seen ‘third-country nationals’ or ‘extracommunitari’. The only – though certainly not unimportant – exception are voting rights, which intra-EU migrants only enjoy at the local and European levels, but not in regional and national elections.

The third and final component of the triad of determinants of migrant claims-making are the collective identities of migrant groups themselves (arrow 4 in Figure 1). This includes migrants’ belonging in a specific ethnic group, their religious affiliation, their identification in

terms of a particular 'race' (e.g., black), and, of course, their degree of attachment to their country of origin. In some of the literature on transnational communities, and particularly in work on diasporas, we find an almost primordialist conception, which takes such collective identities as fixed and stable attributes, which migrants take with them and insert into the country of settlement. We believe that such identities are to a considerable extent influenced by both other explanatory variables in our model, the receiving state's integration and citizenship regime (arrow 5), on the one hand, and the conglomerate of homeland influences which we have alluded to above (arrow 6), on the other.

Receiving states may influence migrant identities directly by offering and sponsoring new categories of identification, which were unknown in the country of origin, e.g., the categories of 'immigrant', 'foreigner', 'ethnic minority', or 'asylum seeker'. At least as important, however, is the possibility that the receiving state's policies alter the balance among diverse identifications that migrants bring along. Contrary to the sometimes overly one-dimensional conception of migrant identities in the literature, most migrants do not arrive with just one identity, but with several overlapping, cross-cutting and competing ones. Immigrants from Surinam, for instance, may see themselves as Surinamese, but also as Dutch, Hindu, Muslim, Indian, Javanese, Chinese, Christian, Jewish, Creole or black, depending on which ethnic, religious, or racial group in Surinam they belong to, or which of their multiple identities they hold as the most important.⁷ By sponsoring and rewarding some of these migrant identities, and discouraging others, receiving states may alter the balance among such multiple identities and switch migrants' primary allegiance from, say, Christian into black, Javanese into Muslim, Creole into Surinamese, etc. etc.

Before we proceed to our analysis of migrant claims-making in Germany, Great Britain and the Netherlands on the basis of this theoretical model, we present in the next section some necessary background on the different approaches to citizenship and migrant integration in these three countries, as well as on the composition of their migrant populations.

Citizenship and migration in Germany, Great Britain, and the Netherlands

Following Brubaker (1992), several authors have emphasized the continuing importance of historically grounded definitions of national identity and citizenship for the integration of

minorities of migrant origin (Castles 1995, Freeman 1995, Joppke 1997, 1998, Guiraudon 1998, Favell 1998). Thus Germany's 'foreigners politics' (*Ausländerpolitik*) was until recently strongly shaped by an ethno-cultural notion of national identity and citizenship, while France deals with its 'immigrants' (*immigrés*) along the lines of the civic ideals of Jacobin republicanism. Among other things, Brubaker's study shows, that these different national traditions affect naturalization rates among migrants and the ways in which migration and integration appear in the public discourse. In similar vein, other authors have drawn on the social movements literature and have explicitly referred to these institutional frameworks for extending citizenship and the discourses around them as 'political opportunity structures' which shape the patterns and levels of migrant and minority mobilisation in different countries (Ireland 1994, Koopmans and Kriesi 1997, Statham 1999, Rosenhek 1999, Koopmans 1999b, Busetta 1997). These 'political opportunity structures' define the availability and relative attractiveness of different options for collective action that challenger groups face (see e.g., Koopmans 1999b; Tarrow 1998; McAdam, McCarthy and Zald 1996).

In our own research, we have argued that this general concept can be best translated into a form that is relevant for the claims-making of migrants and ethnic minorities, by focussing on notions of national identity and citizenship and their concrete reflection in policies of minority integration, which we define as the relevant set of opportunity structures for explaining migrant claims-making.⁸ Two basic dimensions of these 'national models of citizenship' can be distinguished. First, following Brubaker (1992), national citizenship may be conceived as either an ascriptive, ethno-cultural community of descent and common cultural traditions, *ius sanguinis*, or alternatively, as a civic community defined by adherence to common political values and institutions, and residence on the state territory, *ius soli*. The second dimension of citizenship relates to the cultural obligations which a country places on defining access to citizenship. Such requirements range from assimilationist to cultural pluralist approaches, which differ in the degree of cultural homogeneity that is demanded by a nation-state for attributing full rights. Here assimilationism is more demanding, it requires that potential new members undergo full conversion to the dominant national culture as the single and unitary focus of identity (at least in the public domain). In contrast, cultural pluralism is more accepting, here the receiving nation recognises, or even facilitates the right of migrants to retain their ethnic or religious difference.

⁷ Of course, the issue is more complex still, because migrants additionally may hold identifications along gender, class, caste or occupational lines, which we ignore here for the sake of brevity and simplicity.

⁸ A more detailed exposition of our approach for combining national versions of citizenship with political opportunities is outlined in Koopmans and Statham (2000). Due to space limitations, the version here will be a much briefer caricature of the basic contours of this approach.

Combining the two citizenship dimensions, we arrive at four ideal-typical national models. *Ethno-cultural assimilationism*, which until very recently was best approached by Germany, makes access to the political community relatively difficult for migrants of foreign origin, and such possibilities as do exist are tied to the precondition that the candidate assimilates to the culture of the country of residence. Even foreigners who do not want to naturalize are expected to behave as ‘good guests’ and adapt to the cultural requirements of their “host” country. A second model *ethno-cultural pluralism*, for which Switzerland may be taken as a European example, shares the formal ethno-cultural basis of citizenship with Germany, but does not require migrants to adapt to one clearly circumscribed cultural model. This of course follows from the high level of cultural heterogeneity that characterizes Switzerland as a nation. Nevertheless, there remains a clear hierarchy between the cultures traditionally recognized within the context of Swiss federalism and the newcomer cultures of migrant origin. The third ideal type, *civic assimilationism*, is best approached by France, which provides for open access to citizenship among other things through *ius soli* attribution to French-born children, but imposes a unitary cultural mode of conduct for citizens in the public sphere. Thus, the French state does not recognize the existence of ethno-cultural groups as public actors, not even those of native origin such as the Bretons or the Corsicans. Until 1981, the right to form associations on an ethnic or cultural basis was even formally prohibited to migrants. In addition, France strictly adheres to the principle of *laïcité*, which implies a clear-cut separation of religion and State, which severely limits the possibilities for the recognition of religious groups and identities in the public sphere (e.g., in the school system or in the media). Lastly, Britain, Sweden, and the Netherlands are different variations of a fourth type, *civic pluralism*. Here, as in France, access to the political community for migrants and their descendants is relatively easy through *ius soli* and/or an active, open naturalization policy. However, such access is not conditional upon assimilation and new citizens are allowed to retain their cultural identities and express them and the interests related to them in the public sphere, including core institutions such as the school system, the military, and the media. Forms of civic pluralism which extend even further than this, and may be labelled ‘multiculturalist’ could even provide for special, formal rights and exemptions from obligations for cultural groups.

Of course, none of the countries mentioned conforms fully to one of the four ideal types, and the migrant/minority politics of each one of them usually constitute varying ‘mixes’ of all four types, with, however, clear emphases in the direction of some ideal-typical positions and not others. Moreover, although historical traditions of national identity and

citizenship may affect the legal and discursive boundaries of a country's minority politics, such boundaries only circumscribe a broad terrain within which important policy shifts are possible, the accumulated weight of which may ultimately push a country into the realm of a quite distinct ideal type. To put at least some flesh on the bones of these schematic characterizations, we now look briefly at some contemporary aspects of the respective citizenship regimes, patterns and forms of immigration and migrant backgrounds, as well as different policy approaches for integration.⁹

Historically, Germany, Britain, and the Netherlands have gone through broadly comparable waves of immigration. All experienced significantly large-scale foreign immigration due to labor shortages from the 1950s until the economic crisis in the early 1970s, when restrictive immigration controls were implemented and maintained. Many of the migrants in Germany were actively recruited, coming as a result of the 'guest-worker' system for importing foreign labor. This produced an official policy that assumed that these 'guests' would one day return to their homelands, and so policies for integration were minimal. In contrast, many of the migrants to Britain were already subjects of the British Commonwealth and until 1971 they automatically received equal political and social rights. Since 1965, Race Relations policies in Britain have officially taken measures to combat racism and discrimination and promote social integration, thus acknowledging that political equality has not led to full equal treatment. Between these two poles of immigration experience, significant numbers of migrants came to the Netherlands, both as colonial subjects, especially from Indonesia, Surinam and the Dutch Antilles, and were recruited as 'guestworkers', largely from Turkey and Morocco, up until 1974, when labor recruitment programs were shut down. As in the British case, those post-colonial migrants who came, stayed and wished to gain nationality faced few barriers to Dutch citizenship. However, in contrast to the German experience, the 'guestworkers' who stayed on faced a more facilitating system of incorporation in the shape of the Dutch 'pillarization' model for including ethnic groups in the national polity, as we outline below.

In 1994, the percentage of foreign immigrants relative to total population amounted to 85 people per thousand in Germany, compared to 51 per thousand in the Netherlands, and only 35/1000 in Britain (Table 1). The higher proportion of foreigners relative to nationals in Germany compared to the Netherlands and Britain, illustrates an important outcome of the

⁹ Here we offer only a few background details of the country cases to assist interpretation of the data. More substantive contemporary overviews can be found in Bade (1994), Münz, Seifert and Ulrich (1997) and Thränhardt (1992) for Germany; Layton-Henry (1994), Solomos (1993) and Mason (1995) for Britain; and Duyvené de Wit and Koopmans and (2001) for the Netherlands.

different citizenship regimes. In Germany, most migrants and their offspring have remained foreigners, as high restrictions were placed on naturalization compared to Britain and the Netherlands. These restrictions in Germany are aptly demonstrated by the fact that in 1997 the number of ‘foreigners’ increased, despite conditions of negative net immigration – the net gain of new ‘foreigners’ were born in Germany of migrant parentage. During the same period, as a result of high numbers of naturalizations, the number of foreigners declined in the Netherlands, in spite of positive net immigration. As a result of these differences, the percentage of foreigners in Britain and the Netherlands strongly underestimates the size of the minority population, as Table 1 makes clear. In fact, Britain, the Netherlands and Germany have broadly similar populations of migrant origin, with the Netherlands surpassing Germany when we include migrants who are Dutch nationals, and Britain coming a close third.

Table 1: Composition of the population of immigrant origin in Germany, Great Britain, and the Netherlands, in promilles (per thousand) of the total population

	Germany ¹	Great Britain ²	Netherlands ³
EU countries	22.62	14.05	11.64
Ex-Yugoslavia	14.45	0.16	3.45
Other Europe	10.12	1.94	1.30
<i>Total Europe</i>	<i>47.19</i>	<i>16.15</i>	<i>16.39</i>
Turkey	24.99	0.52	17.89
Iran	1.42	0.33	0.43
India	0.42	15.3	0.22
Pakistan	0.47	8.7	0.26
Bangladesh	*	3.0	*
China	0.52	2.9	1.41
Indonesia	0.13	*	15.98
Other Asia ⁴	7.06	2.8	2.32
<i>Total Asia</i>	<i>35.01</i>	<i>33.4</i>	<i>38.51</i>
Morocco	0.99	0.17	14.95
Other North Africa ⁵	0.67	0.04	0.22
Other Africa	1.99	3.8	2.02
<i>Total Africa</i>	<i>3.65</i>	<i>4.0</i>	<i>17.19</i>
North America	1.50	2.69	0.97
Caribbean	*	9.1	20.97
Other Latin America ⁶	1.00	*	0.57
Australia and Oceania	0.12	1.20	0.17
Sum total	89.38	66.70	94.77
Total including persons with acquired citizenship through naturalization or jus soli for all groups ⁷	*	74.94	121.76
Foreigners as of 1 January 1994 ⁸	84.56	35.39	50.83
Muslims ⁹	*	16.4-27.3	40.71
Sikhs	*	5.5-9.1	*
Hindus	*	7.3-10.0	4.81

Notes

1. The German data are based on the official statistics regarding the foreign population (Statistisches Bundesamt 2000) and refer to the situation on 31 December 1999. These data do not include naturalized

persons of foreign descent for which no cumulative statistics are available. However, due to an until recently very restrictive naturalization regime, the actual number of naturalized foreigners is still very low in Germany. E.g., in the thirteen-year period between 1980 and 1992 only 230,000 foreigners were naturalized (which amounts to 0.3% of the total German population).

2. British data are taken from the Official Census data 1991 (Owen 1992, cited Mason 1995) which includes a question on ethnic background and so includes naturalised migrants. From the categories in the Census it is possible to arrive at accurate estimates for the following categories: India, Pakistan, Bangladesh, China, Other Asia, Other Africa (derived from Black African), Caribbean. In addition, to these there are two other categories Black Other and Other Other ethnic groups which capture the remainder of the 'ethnic' population. Europeans and North Americans are categorised as 'Whites' in the Census data, and can therefore not be distinguished from native Britons. As in the case of the Netherlands, we have drawn data for the remaining categories from Eurostat 1994, which, however, only include foreign nationals and exclude naturalized persons from these regions and countries.
3. Data for people of Turkish, Moroccan, ex-Yugoslav, Caribbean, and Indonesian origin, as well as the total figure for the population of migrant origin were taken from Sociaal en Cultureel Planbureau 1999: 28. They include all persons born outside the Netherlands to foreign parents, as well as people born in the Netherlands of which both parents were born outside the Netherlands. Persons born in the Netherlands out of 'mixed' marriages have not been included, nor persons born abroad to Dutch parents. The figure for Chinese is based on the same definition and was taken from the Sociaal en Cultureel Planbureau 1997: 19. Figures for all other categories are 1992 figures based Eurostat 1994: 8-9), where necessary in combination with data from the CBS 1996: 52. Because the 1992 figures are relatively old and do not include naturalized persons, the sum of all group figures (next to last table row) is substantially lower than the total population of migrant origin as calculated in SCP data (final table row).
4. For Germany and the Netherlands, 'other Asia' includes (a very small number of) Bangladeshi. For Britain, the figure has been taken from the census category 'Other Asian', subtracting the Eurostat figures for Turks and Iranians.
5. For the Netherlands and Britain, excludes (small numbers of) Lybians and Egyptians.
6. For Germany, 'other Latin America' includes (a very small number of) persons from Caribbean countries.
7. The British figure is an estimate based on the total non-white population data from the 1991 Census, adding the Eurostat figures for nationals of other European countries, North America, Australia and New Zealand.
8. Taken from Lederer 1997: 35-37.
9. Dutch figures as of 1 January 1995 from CBS 1996: 53. For Britain, figures for the 2001 Census which will also include a question on religion are not available yet. The range estimates for Muslims, Sikhs, and Hindus in the Table are taken from the current literature (Poulter 1998: 197, 238, 282; Rex 1996).

Turning to the countries of origin of the minority populations as displayed in Table 1, we note stark differences between the countries. All have significant numbers of European migrant populations, but Germany's migrant population is by far the most dominated by Europeans (even if one counts Turkey under Asia as we have done in the table). Today in Germany, the main 'foreigner' groups are from Turkey (almost 30% of foreigners), former Yugoslavia (one sixth), Italy, Greece and Poland. In Britain, a large proportion of the 'minorities' are British-born, with more than one third coming from the Indian sub-continent and about 12% from the Caribbean. The Netherlands has significant numbers of Turkish migrants in common with Germany, and significant numbers of Caribbean migrants like Britain, and so there are important equivalent groups that can be compared. In addition, the Netherlands have large numbers of people of Moroccan and Indonesian origin, which are hardly found in the two other countries. Lastly, it should be pointed out, that both migrant populations contain religious groups that allow for comparison. Both the large Turkish community in Germany,

the Moroccan and Turkish communities in the Netherlands, and the Pakistanis and Bangladeshis in Britain are predominantly Muslims, and make up roughly comparable percentages of the population.

Major differences between the countries are found in their political strategies for incorporating migrants, which reflect their type of citizenship attribution. Parallel to, and partly as a direct result of their exclusion from formal citizenship, migrants and their organizations – as foreigners – play a marginal role in the German political process. Germany has maintained a policy approach where migrants are excluded from political participation. Apart from the powerless and marginal foreigners' councils (*Ausländerbeiräte*) on the local level, foreigners in Germany have no institutionalized channels of access to the political process. The German state does not provide the kind of facilitation to migrant organizations that many of their British and Dutch counterparts receive. There is no institutional focus for minority claims in the form of an official minority, racial equality, or anti-discrimination politics, which might legitimate migrant demands and identify responsible authorities for their implementation. The official mantra that 'Germany is not an immigration country', which German governments until very recently adhered to, has therefore had real consequences for the opportunities for minority claims-making.

In contrast to Germany, migrant organization and political participation – as ethnic or racial minorities - is facilitated by the British state, particularly at the local level. In Britain, a state-sponsored 'race relations' industry has emerged backed by anti-discrimination legislation and the authority of the Commission for Racial Equality and local bodies to report and advise on practices for ensuring equal treatment, in particular in the labor market. It is worth emphasizing, that 'race' is a category that British political élites adopted when attempting to address the disadvantage of minority populations caused by discrimination. This 'racialization' of policy measures in part reflected the fear of political élites that British 'race riots' might escalate to the crisis point of those experienced in the United States. An outcome of this is that British policies were more tailored to the integration of Afro-Caribbeans under the generic umbrella term 'black', than the relatively later inflows of migrants from the Indian sub-continent, and in particular Pakistan (Rex 1991). Race relations politics has been extended to Indians, Pakistanis and Bangladeshis under the generic term 'Asian', which implies that groups with a self-identification that is non-racial, the prime example being groups with a Muslim identity, have been served relatively less well by the institutional apparatus (Modood et al. 1997). Another point worth making about the British case, is that the constituency-based electoral system has provided the large concentrations of minority

communities in specific towns and regions with a considerable resource-base of voting power for influencing individual Members of Parliament, and has in turn led political parties to take up issues relating to ethnic minorities. At the local level of politics, minorities have also made a considerable impact in specific regions (e.g., Solomos and Back 1995).

Lastly, turning to our third case, the Netherlands recognized relatively early that many migrants would remain, and reacted through the inclusive *Minderhedennota* of 1983, based on the principle that 'Dutch society will permanently have a multicultural character' (for further detail on the Dutch case, see Duyvené de Wit and Koopmans 2001). In line with the Dutch tradition of pillarization, the government's policies provided for a large degree of autonomy for 'ethnic minorities' in the cultural sphere, incorporated minority elites into the policy process through subsidization of representative organizations and their inclusion in the policy deliberation and implementation processes. In the Netherlands, and in stark contrast to the German situation, the state even opened up civil service positions and local voting rights to foreign residents. In addition, Dutch cultural pluralism did not provide the 'racialised' straightjacket for minority identities of the British variant. Rather than requiring resident former colonial subjects to become racial minorities to achieve rights, the Dutch view integration as best accomplished through confident subcultures, thus making the preservation of minority cultures an essential part of incorporation. Although Dutch minority policy moved away from this idealist undiluted multiculturalism of the 1980s, and toward a more British-style focus on socio-economic parity in the 1990s, when the realism set in that maintaining group diversity could also mean structuring disadvantage for those groups, it still retains important distinctive characteristics. The continued relevance of the institutional inheritance of pillarization still makes the Netherlands unrivalled by Britain in the range of cultural opportunities that are provided. While the issue of Muslim schools is highly contested in Britain, with the first non-primary school being given state funding in 2001, there have already been dozens of state-funded Muslim and Hindu schools in the Netherlands for some years. Just as the 'old' Christian and Protestant pillars had their own state-sponsored semi-autonomous institutions in education, health, welfare and the public media, such rights cannot be denied to the new cultural and religious minorities of migrant communities. This Dutch multiculturalism *avant la lettre* adding minorities and foreigners on as another 'pillar in the polder', is important to our current discussion, as the Dutch cultural pluralist approach, provided incentives for migrants – both former guestworkers and resident colonial subjects – to keep their heads, at least through cultural identification, in both the homeland and receiving societies, whilst at the same time gaining a significant degree of access to political and social

rights. This makes the Dutch trajectory different from Germany, where the political exclusion of former guestworkers under the banner ‘Germany is not a country of immigration’ left migrants looking homewards, and different from Britain where the ‘racialisation’ of cultural pluralism, shaped postcolonial migrants into inward-looking British racial minorities.

Data collection¹⁰

To investigate the public claims-making of migrants and ethnic minorities in Germany, Britain and the Netherlands, we use data drawn from content analyses of daily newspapers in the three countries. In contrast to many media content analyses, we are not primarily interested in the way in which the media frame events. On the contrary, our focus is on the news coverage of mobilization, public statements and other forms of claims-making by non-media actors. Taking a cue from ‘protest event analysis’ in the study of social movements (Tarrow 1989; Olzak 1989; Rucht, Koopmans, and Neidhardt 1998), our units of analysis are not articles, but individual instances of claims-making. Instances of claims-making have been included irrespective of their form, and range from violent attacks on other groups, public demonstrations and legal action, to public statements.

Acts were included in the data if they involved demands, criticisms, or proposals related to the regulation or evaluation of immigration, minority integration, or xenophobia. Because of our special interest in minority claims-making, we included acts by resident ethnic minorities even if they were not related to these issues – provided, of course, that they involved some political claim – which in particular allowed us to include the claims-making of migrants related to the politics of their homelands.¹¹ Regarding territorial criteria we included all acts in Britain¹², the Netherlands, and Germany, respectively, even if they were addressed to foreign or supranational authorities, or made by organizations (primarily) based outside our countries of study. All these types of acts were considered to be claims in the British, Dutch or German public spheres.

¹⁰ A more detailed exposition on the methodological approach is given in Koopmans and Statham 1999b.

¹¹ This excludes acts of international terrorism that could not be plausibly interpreted as part of the claims-making of a particular resident ethnic community, for instance, most forms of Middle Eastern terrorism. Acts by terrorist groups were included, however, if they were significantly linked to a resident ethnic community, e.g., the Kurdish PKK in Germany, or the planting of a car bomb by Islamic fundamentalists outside the Israeli embassy in Britain.

¹² Britain here does not refer to the whole of the United Kingdom, but to the main island; events in Northern Ireland were excluded. Moreover, because Scotland has its own press, our data include few Scottish events. If we talk about Britain, therefore, we are in fact mainly implying England and Wales - which is where more than ninety percent of the total population and an even larger percentage of ethnic minorities in the UK live.

There are obviously limitations to our data. First, the data-set excludes claims-making outside the public sphere (e.g., lobbying), as well as claims-making in partial public spheres (e.g., claims directed at school boards by parents, or purely local issues). However, it should be pointed out that once such claims become controversial they, too, tend to eventually be reported in the nationwide press, and would then be picked up by our sources. Second, we do not, of course, through this method collect information on the claims-making in the public sphere of the sending countries. Third, for an article on transnationalism, one may object that our focus on *national* public spheres introduces a bias in our results to the detriment of trans- and supranational actors and claims. This would be true if there was such a thing as an *international* or *European* public sphere. In the absence of supranational media or transnational public debates of any importance, the public claims-making of supranational actors (or claims-making addressed to supranational actors) and transnational claims-making has to be mediated through national public spheres in order to be effective and visible. At present the modest beginnings of an international public sphere in the form of television networks, cannot compete in terms of audience or resonance with national media, not least because of the language factor. Thus if they are to be politically meaningful, supra- and transnational claims-making will be found in national public spheres.

For the comparative analysis here, we use data drawn from every second issue (Monday, Wednesday, Friday) of *The Guardian* for Britain, the *Frankfurter Rundschau* for Germany, and the *NRC/Handelsblad* for the Netherlands.¹³ These papers were chosen because they are of a comparable, moderately left-liberal political affiliation, and because, compared to other national quality newspapers, they have the most encompassing coverage of the specific issues of interest. The data cover slightly different periods in the three countries: 1990-1999 for Germany, 1990-mid 1998 for Britain, and 1992-mid 1999 for the Netherlands. Of course, when using newspapers as a source one has to deal with the problem of selection – not all events that occur receive coverage – and description bias – events may get covered in a distorted way (McCarthy et al. 1996). We have tried to minimize the problem of description bias by explicitly basing the coding only on the factual coverage of statements and events in

¹³ Data were coded from microfilm and CD-ROM versions of the newspapers by trained coding assistants on the basis of a standardized codebook. All articles in the home news section of the newspapers were checked for relevant acts, i.e. the search was not limited to articles containing certain key words. For the main variables in the analysis (actors, addressees, aims, etc.) open category lists were used, which allow us to retain the detail of the original reports in the analysis. In addition, hard copies of the original articles were kept to allow us to go back to the original reports if information was needed that had not been captured by the variables and categories included in the codebook (codebooks are available from the authors on request). The use of very detailed open category systems including hundreds of different actors and claims entails that conventional measures of intercoder reliability are not applicable to these variables. Anyway, the categorizations used in the present

newspaper articles, and leaving out any comments and evaluations made by reporters or editors. In any case, quality newspapers have to protect their reputation and cannot afford to quote claims patently incorrectly. Since our interest here lies with *public* claims-making, the problem of selection bias is less aggravating here than in some other contexts, because acts of claims-making become relevant – and potentially controversial – only when they reach the public sphere.¹⁴

The collective identities of migrants in the public sphere

The first aspect of migrant claims-making we want to investigate are their collective identities as expressed in the public sphere. We distinguish four main types of collective identities here. First, migrants may identify along the status categories offered by the receiving state's immigration and integration policies e.g., as 'foreigners', 'minorities', (illegal) 'immigrants', 'asylum seekers', etc. As indicated in the last section, the favored policy categories in our three countries differ considerably in this respect: German policies are centered around the category of 'foreigners', whereas in Britain the 'minorities' category predominates. Given its partial guestworker legacy and its – compared to Britain – more recent turn towards a civic conception of citizenship, Dutch policy categories are to some extent a combination of the 'foreigners' (*buitenlanders, vreemdelingen*) and 'minorities' (*minderheden*) idioms.

analyses are not based on coder decisions, but are the result of aggregations of raw codes by the authors (for a similar two-stage procedure of content analysis, see Shapiro and Markoff 1998, pp. 73ff., 199ff).

¹⁴ However, it may be that our sources have specific biases that make the data drawn from them unrepresentative for the print-media landscape at large. To check for such biases, we have in two of the countries, Germany and Britain, drawn additional samples from other newspaper sources. In Germany, we coded two years of the right-wing tabloid *Bild Zeitung*, one year of the German-published edition of the Turkish daily *Hürriyet*, as well as four-month samples from three different local dailies. In Britain we have a cross-section of six national newspapers for the year 1995: *The Times*, *The Daily Express*, *The Daily Mirror*, *The Sun*, and *The Daily Mail*, in addition to *The Guardian*. Comparisons among these sources confirm that our main sources give relatively broad coverage to issues of immigration and ethnic relations. Importantly, the sometimes large differences in coverage rates do not lead to very different distributions of acts on important variables. For the present purpose, the comparison of the *Frankfurter Rundschau* to the *Hürriyet* for the year 1995 is particularly relevant. As a mainstream newspaper with a readership drawn mainly from the majority culture the *Rundschau* of course does not cover claims-making by ethnic minorities to the same extent as the *Hürriyet*, which caters specifically to the Turkish immigrant community. Indeed, the number of ethnic minority claims reported was about three times higher in the *Hürriyet*, with, of course, a heavy bias toward claims-making by Turkish and Kurdish groups. However, this difference in the quantity of coverage hardly affects the distributions among types of claims. As we will see further on, the most striking characteristic of German minority claims-making is the predominance of homeland-related claims. The comparison with the *Hürriyet* shows that this result is not the product of a construction by German mainstream media, who would ignore claims-making by minorities for rights in Germany and focus disproportionately on conflicts imported from migrants' homelands. For the year 1995, the percentages of homeland-related claims in the two newspapers are very close: 67% in the *Rundschau* and 60% in the *Hürriyet*. Information on similar checks for comparing the other German and British newspapers are available from the authors on request.

Secondly, migrants may identify with a certain 'racial' group, such as 'blacks' or 'Asians'. As we have seen above, this type of collective identity is officially sponsored only in Great Britain, where racial categorizations form the cornerstone of race relations and equal opportunities policies. Therefore, we expect such identities to be more prominent in Britain than in the other two countries. Beyond an adaptation to an opportunity structure which favors claims made in racial terms, racial identities such as black may also be seen as to some extent prior to, or otherwise independent from the respective groups' insertion into the receiving society. In this view, cherished by many black activists, there exists a transnational 'black nation', which connects people of color around the world through bonds of shared destiny and identity. If this view holds true, we should find a considerable amount of racial claims-making also in the Netherlands, which has a large Caribbean population of African descent, and even to some extent in Germany, although in that country the potential constituency for such identities is limited to a relatively small number of African immigrants.

Thirdly, migrants may identify with their religion, e.g. as Muslim, Hindu or Orthodox. This type of collective identity is, as we have indicated above, facilitated by the state in Britain, where migrants' religious difference comes under the umbrella of officially sponsored multiculturalism, and even more so in the Netherlands, where migrant religious communities can refer to the institutional framework and precedent of pillarization to claim rights and privileges. In Germany, by contrast – with the notable exception of the Jews – the state has thus far offered little recognition, policy access, and concessions to minority religious communities, and to Muslims in particular. Therefore, we expect religious identities to be more prominent in Britain and the Netherlands than in Germany. However, here too, we must take into account the assertion made by some religious activists – particularly Muslims – and by several students of transnationalism, that religious identifications are transnational phenomena, which are independent from, prior to, and to some extent in direct conflict with migrants' integration into the host society. If this is the case, we should find migrants of Muslim belief to be inclined to identify along religious lines largely independent from the national context of the country of immigration.

Fourthly, migrants may (continue to) identify with their ethnicity and the nationality of their countries of origin, e.g. as Turks, Pakistani or Surinamese. The transnational, and even more so the diaspora perspective, see the prevalence and endurance of such collective identities as an important characteristic of the modern migrant experience. A focus on the opportunity structures set by national citizenship and integration regimes, however, would predict important differences among our three countries. Identifications along national and

ethnic lines should to be most prominent in Germany, where high hurdles to obtaining citizenship until recently prevented migrants from joining the national community and migrants to some extent still continue to be seen as citizens of their countries of origin (e.g., integration policies insofar as they exist are still dealt with by 'Foreigners' Commissioners' - *Ausländerbeauftragte*). Britain, with its strong civic tradition of citizenship and imperial tradition, provides the clearest contrast, while the Netherlands come somewhere in between. Although the Dutch system offers minorities at least as much recognition and policy access as in Britain, it does so – although much less outspoken than during the 1980s – on the basis of a classification of, and resource allocation to minorities on the basis of ethnicity (with Turks, Moroccans, Surinamese, and Antilleans as the four main officially recognized minorities).

Finally, we include one hybrid identity category in our analysis for ethno-religious groups such as Jews and Sikhs, for which religion and ethnicity are indistinguishable. Sikhs are only a relevant immigrant category in Britain, so there is little to compare here. As regards the Jews, we can expect them to fall into the general pattern for Britain and the Netherlands, but to deviate from other groups in the German case. As a result of policies of reconciliation and recompensation for the crimes of the Nazi regime, Jews are highly privileged in Germany compared to other migrant groups, both regarding immigration rights, access to citizenship, and special cultural rights and sponsorship (see Laurence 2001). To some extent this also holds for the category of Roma and Sinti, which we include among the ethnic groups, who were also victims of the Nazi regime.

In Table 2, we present the distribution of migrant claims in the three countries across these five types of collective identities, as well as across relevant subcategories.¹⁵ The results in the table clearly underline the importance of national citizenship and integration regimes in shaping the collective identities of migrant communities. Status identities based on the receiving states' policy categories are generally more prominent in Britain and the Netherlands than in Germany. Apart from the category of asylum seekers, which is relevant in

¹⁵ This analysis is based on all claims recorded from our newspaper sources. To control for the possibility that the collective identities thus measured simply reflect the ascription of identities to migrants by journalist, and not migrants' self-identifications, we have separately analyzed the subsample of claims for which we know the full name of the organization which made the claim. Organizational names are important vehicles for the self-presentation of groups towards both their constituency and the wider society, and can therefore be taken as a valid indicator of the group's collective identity. The results for this subsample are very similar to the ones reported here, with one exception: in the British case, the racial category of 'Asian' was not used in any organizational name, suggesting that this official label for migrants from the Indian subcontinent is a state construct that has little significance to group it is meant to cover (see further Koopmans and Statham 1999a: 675-679).

Table 2: Collective identities in public claims-making by migrants and minorities in Germany, Great Britain, and the Netherlands (percent)

	Germany	Great Britain	Netherlands
Policy-status identities	11.1	18.5	24.6
Foreigners	4.3	-	9.0
Minorities	0.1	8.3	4.1
Immigrants	0.9	-	0.3
Asylum seekers	5.3	9.3	7.0
Illegal immigrants	-	0.3	2.6
Other	-	0.6	1.7
Racial identities	0.2	38.6	1.2
Black	0.2	28.1	1.2
Asian	-	9.6	-
Other	-	0.9	-
Religious identities	2.5	22.8	18.0
Muslim	1.5	21.9	15.9
Hindu	-	0.3	1.2
Other	1.0	0.6	0.9
Ethno-religious identities	20.4	6.8	5.2
Jewish	20.4	4.6	5.2
Sikh	-	2.2	-
Ethnic and national identities	67.3	20.5	56.7
EU countries	0.6	1.9	0.3
Ex-Yugoslav ethnicities	2.9	0.6	2.3
Sinti and Roma	8.3	0.3	0.6
Other European	1.0	0.9	1.4
Total Europe	12.8	3.7	4.6
Turkish	18.1	0.3	15.9
Kurdish	30.3	0.9	11.9
Iranian	2.9	1.2	1.4
Indian subcontinent ethnicities and nationalities	-	5.5	-
Chinese	0.3	0.9	1.4
Indonesian/Mollucan	-	-	2.6
Other Asian	1.5	2.2	1.2
Total Asia	53.1	11.0	34.4
Morocco	-	-	8.4
Other North African	0.2	0.9	0.9
Other African	1.0	3.1	4.6
Total Africa	1.2	4.0	13.9
Caribbean	-	1.5	3.8
Latin American	0.2	0.3	-
Total Americas	0.2	1.8	3.8
Sum total*	101.5%	107.2%	104.5%
N=	1,297	324	345

Note: - = no cases

* The sum total adds up to more than 100% because of possibilities of multiple identifications, e.g., the Union of Turkish Immigrants, which would get two identity codes: 'Turkish' and 'immigrant'.

all three countries, claims-making on the basis of a minority status is limited to Britain, and, to a somewhat lesser extent, to the Netherlands. While in the Netherlands and Germany the status identity of foreigner plays a considerable role, this identification is completely absent in Britain. Surprisingly, the foreigner identity is even more prevalent in the Netherlands than in Germany. The high score for the Netherlands here is almost entirely due to one very prominent organization, the Dutch Center for Foreigners (*Nederlands Centrum Buitenlanders*) – a state-subsidized organization that was set up in the guestworker era to assist, and represent the interests of labor migrants. Although this organization has long broadened its scope to include issues of integration and multiculturalism, its prominence is still indicative of the hybrid nature of the Dutch integration model, with its partial roots in a German-style guestworker regime, on the one hand, and a civic, pluralist tradition rooted in pillarization and colonialism, on the other.

The results for racial identities are extremely clear-cut: racial – particularly black – identities are by far the most important type of collective identity among migrants in Britain, but they are virtually absent in the two other countries. This may not be so striking for the German case, but it is so for the Netherlands, which has a population of African descent with ‘black’ phenotypical features that is at least as important as in Britain. Moreover, the majority of Dutch “blacks” come from the same geographical area, the Caribbean, as their British counterparts, and share the same history of deportation, slavery, and racism. This example shows in a very powerful way how important national opportunity structures are for shaping collective identities in an immigration context. The prominence of race in Britain’s integration regime has offered a formidable opportunity to Caribbean immigrants to achieve a presence in the public sphere that is unrivalled by their Dutch counterparts, and has also put them in a privileged position vis-à-vis other minorities in Britain. If we look downward in the table among the ethnic and national identities, we see that Caribbean nationalities are somewhat more prominently represented in the Netherlands than in Britain (3.8% versus 1.5%), but this is a very meager compensation for the 28 percent of black claims in Britain.

Proceeding to collective identities on a religious basis, we again find a striking contrast, this time between Britain and the Netherlands, on the one hand, and Germany, on the other. Although Germany has a Muslim population that is comparable to Britain and the Netherlands, Muslims are almost completely absent from the German public sphere. Contrary to the view of Islam as a transnational collective identity, we see that German Muslims have little inclination to make claims on the basis of their religion. This is not to say that migrants of Muslim belief are not active claims-makers in Germany. However, as we shall shortly see,

they make such claims on the basis of their ethnicity and nationality rather than their religion. We contend that this is so partly because the German state offers few opportunities for such claims-making. In addition, as long as migrants in Germany mirror the state's view by not seeing themselves as part of the German community, religious rights and equality are not a salient political issue for them. Once a large number of Muslims, as in Britain and the Netherlands, have become citizens, they both have improved opportunities for making claims and will feel more strongly entitled to fully equal rights and treatment to those enjoyed by Christian (and sometimes also Jewish) denominations.

We can also, however, find an indication in the data on religious identifications for inter-group differences that seem to be unrelated to the receiving state's integration policies. Compared to Muslims, we find Hindus to be much less prominent in the public sphere. While in the Netherlands this difference can at least partly be explained by the fact that there are about nine times more Muslims than Hindus there, this explanation certainly does not hold for Britain with its large population of Indian origin. We suspect that this difference may be due to the different nature of the two religions, particularly the fact that Islam – at least in its recent manifestations around the world – is much more a public religion than Hinduism. If this view is correct, it would explain why Muslims have made more claims for religious rights than Hindus, and also why Islam is singled out as a threat to Western values much more than Hinduism is.

Turning now to the ethno-religious identities, we see that indeed there is an enormous contrast between the invisibility of Muslims in Germany and the highly prominent position of Jews in the public sphere. As a result of their status as victims of the Holocaust, Jews are considered as highly legitimate speakers on issues of racism and xenophobia, which account for the majority of Jewish claims in Germany. However, alone the number of claims for religious rights by Jewish groups is larger than all Muslim claims taken together – even though there are more than forty times less Jews than Muslims in Germany. This is another striking example of how diverging state integration approaches and the symbolic inclusion or exclusion of groups in political discourse can have enormous consequences for these groups' collective identities and mobilization opportunities.

Finally, in the lower part of the table, we look at different national and ethnic identities, which we have ordered as much as possible similar to the categories used in Table 1. As could be expected on the basis of our discussion of national citizenship and integration approaches, such collective identifications are most prominent among migrants in Germany, where more than two thirds of all claims were made in the name of national or ethnic

collectivities. In line with the by now familiar pattern, we find ethnic and national identifications to be least prominent in the British case, where only about one fifth of identities were of this type. The Netherlands (57%) are again in between, but, perhaps surprisingly again, much closer to Germany than to Britain. Again, we must interpret this partially as a legacy of the guestworker era. Perhaps more important is that the particular Dutch form of multiculturalism extended rights and incorporated migrant organizations into the policy process on the basis of ethnicity, and not race as in Britain or immigrant status as in France. In addition, the extreme form of multiculturalism that prevailed in the Netherlands until quite recently put a heavy emphasis on migrants retaining their "cultural identity", and exerted little pressure on migrants to adapt to Dutch society, for instance by mastering the Dutch language (Duyvené de Wit and Koopmans 2001).

If we look more in detail at the different ethnic and national groups present in the claims-making, we of course find these to reflect to an important extent the composition of the migrant population in the various countries. However, there are some clear under- and over-representations of groups that deserve our attention (compare Table 2 to Table 1 above). The clearest case of under-representation in all three countries are migrants from other EU countries. With their secure residence status, full labor market access, freedom of movement, and partial political rights, these migrants have almost the same legal status as natives. In addition, compared to many other migrant groups, they are little subjected to discrimination, and they are not (any longer) perceived as culturally very different from the native population. On the contrary, EU migrants tend to have a very positive public image, and it is politically virtually a taboo to say anything negative about their presence. Thus, EU migrants simply have little need for making claims on their host societies. The same is true in the Netherlands and Britain for certain categories of colonial migrants, who have been socio-economically successful and are culturally perceived as adapted and unobtrusive. In Britain, this may explain the low level of mobilization of Indians (Statham 1999), in the Netherlands the absence of a large number of claims by people of Indonesian origin. All 'Indonesian' claims in the Netherlands were in fact made by Mollucans, who are a distinct group which still strives for independence of its homeland from Indonesia, and who have long cherished a myth of return that has prevented them from integrating into Dutch society. It is less clear, however, why the number of claims by Caribbeans (Surinamese and Antilleans), who make up about one-sixth of the total population of migrant origin is so low in the Netherlands. Certainly, this cannot be explained by these groups having already achieved full equality, since their living conditions (unemployment, schooling, housing, etc.) are still considerably worse than those of

the native Dutch (although generally better than those of Turks and Moroccans). Research done by Fennema and Tillie (1999) comparing the organizational networks of ethnic groups in Amsterdam suggests that this low level of mobilization of Surinamese and Antilleans may be due to the fact that, compared to Moroccans and especially Turks, these groups have weakly developed ethnic community networks.

The group that is most outspokenly over-represented are the Kurds, who account for perhaps some twenty percent of migrants from Turkey, but who are responsible for 12% of all claims-making in the Netherlands, and as much as 30% in Germany. Of course, this has much to do with the Kurdish independence struggle, which, moreover, went through a particularly "hot" phase during the 1990s. On a lower level, similar homeland influences account for the overrepresentation of Iranian claims in all three countries. A final group that is clearly over-represented are the Roma and Sinti in Germany (8% of all claims). As indicated above, this is related to this group's status as Holocaust victims and the public legitimacy and to some extent privileged treatment by the state that this entails.

All in all, these results provide strong and suggestive evidence for the importance of national citizenship and integration regimes in shaping migrant mobilization. These 'national' factors go a long way in explaining cross-national differences, and also account for some of the inter-group differences within countries (e.g., the low mobilization levels of EU migrants everywhere, or the special position of Jews and Roma in Germany). However, in line with the conceptual model we have outlined above, we also need to take homeland influences into account, such as the political conflicts in Kurdistan and Iran. Finally, there remain inter-group differences that can neither be explained by national, nor by homeland influences, and point to specific non-reducible characteristics of migrant groups. The independence dream of the Mollucans – which has always been more of an issue for the exiled group than for the Mollucans in Indonesia –, or the weak community networks of Caribbean migrants in the Netherlands are examples of such group-specific factors.

Transnational and national claims-making and how they relate to migrant identities and national citizenship

We now turn to the overall structure of migrant claims, and how they reflect national, homeland, or hybrid orientations. We distinguish three types of transnational claims-making. The first type might be called 'transplanted homeland politics'. In this type, claims are made

by migrants in the country of settlement, but they refer in all other respects to the country of residence. A typical example are claims made by exile groups or branches of homeland-based organizations¹⁶, directed at or against the homeland regime, or targeting homeland regime representatives or institutions in the country of settlement. In the case of homeland-based interethnic or religious conflicts (e.g., between Serbians and Albanians), such claims may also take the form of conflicts between the involved ethnic groups in the country of settlement. The other types of claims-making are more substantively transnational in the sense that they are a hybrid of homeland-directed and country of settlement orientations. The second type consists of claims whose ultimate political aim is oriented towards the homeland, but which mobilize country of settlement-based organizational networks or political opportunities to these ends. A typical example would be claims-making by ethnic organizations originating in, and addressed at the government of the country of settlement, asking the latter to intervene with the homeland government on behalf of the group's interests (e.g., a demand by the Council of German Roma and Sinti on the German government to pressure East European governments to combat anti-gypsy violence¹⁷). Thirdly, the claim structure may also be the reverse, namely when homeland-based groups mobilize homeland-based organizational resources and opportunities to intervene on behalf of the group's interests in the country of settlement (e.g., when Milli Görüs sets up an Islamic Center in Germany). In Table 3 below, we contrast these three forms of transnational claims-making with such claims-making by migrants and minorities which stays entirely within the political context and the public sphere of the country of settlement, i.e., where organizations originating in the country of settlement advance claims on authorities in the country of settlement in order to further the interests of a constituency in the country of settlement (e.g., a letter by the National Federation of Chinese Organisations to the Dutch government calling on it to pay more attention to social problems within the Chinese community).

Table 3 shows that in all three countries, purely national claims are the largest category. However, in line with the expectation we can derive from its exclusive citizenship and integration regime, we find in Germany a sizeable amount of transplanted homeland politics (28%), much more than in the other two countries. In Great Britain and the Netherlands, transplanted homeland politics is the smallest among the four types of claims-making (3% and 10% of all claims, respectively). The most frequent type of transnational claims in these two countries are those that mobilize homeland-based resources and

¹⁶ We count exile organizations (e.g., the National Resistance Council of Iran) and branches of homeland organizations (e.g., the PKK's, Milli Görüs' or the FIS' various European branches) as homeland-based organizations, even if these organizations may sometimes be formally banned in the homeland.

opportunities to further the group's interest in the country of settlement (10% in the Netherlands and 7% in Britain). In Germany, by contrast, this is the least important form of transnationalism (4%). A large percentage of claims in this country are of the type mobilizing country of settlement resources and opportunities for homeland-related ends (16%). Compared to the results on migrant identities (Table 2) the Netherlands here display a pattern that is much closer to Britain. This reflects that while the Dutch integration model to some extent favors the retention of ethnic and national identities by migrants, it simultaneously incorporates ethnic migrant organizations into the policy process and thereby focuses their claims-making on issues pertaining to migrants' integration into Dutch society. This in contrast to Germany, where the classification of migrants as foreigners and their exclusion from citizenship and the policy process go hand in hand.

Table 3: Distribution of migrant claims across four basic types of claims-making

	Germany	Great Britain	Netherlands
Transplanted homeland politics	27.5	2.5	9.9
Homeland-directed transnationalism	16.1	4.0	8.1
Country of residence-directed transnationalism	3.8	6.5	10.1
Purely national claims	50.1	83.3	71.0
Unknown/other	2.5	3.7	0.9
Total	100.0%	100.0%	100.0%
N=	1,297	324	345

While these results point towards an overriding role for the national citizenship and integration regimes of the country of settlement in explaining patterns of migrant claims-making, we have seen above in our discussion of collective identities that homeland influences and specific characteristics of migrant groups may also play a role. To what extent can such factors explain the cross-national differences in homeland-directed versus country of settlement-directed claims-making? To investigate this question, Table 4 displays for each of the identity groups which we have distinguished the percentage of its claims that were oriented towards aims in the group's country or region of origin.

¹⁷ All examples in the text are actual cases drawn from our data on claims-making.

Table 4: Percentage of homeland-oriented claims by identity group

	Germany	Great Britain	Netherlands
Policy-status identities	13.2	6.5	2.8
Foreigners	18.0	-	0
Minorities	(0)	3.7	7.1
Immigrants	0	-	(0)
Asylum seekers	8.3	7.1	4.3
Illegal immigrants	-	(0)	0
Other	50.0	(0)	0
Racial identities	(0)	0	(0)
Black	(0)	0	(0)
Asian	-	0	-
Other	-	(0)	-
Religious identities	27.3	15.7	10.3
Muslim	15.0	16.4	10.9
Hindu	-	(0)	(0)
Other	46.2	(0)	(0)
Ethno-religious identities	2.3	9.1	11.1
Jewish	2.3	6.7	11.1
Sikh	-	14.3	-
Ethnic and national identities	48.7	7.1	26.9
EU countries	12.5	0	(0)
Ex-Yugoslav ethnicities	78.4	(0)	37.5
Roma and Sinti	9.3	(0)	(0)
Other European	53.9	(0)	(20.0)
Total Europe	23.0	0	25.0
Turkish	39.4	(0)	26.9
Kurdish	90.6	(0)	73.2
Iranian	97.3	(50.0)	(20.0)
Indian subcontinent ethnicities and nationalities	-	11.8	-
Chinese	(100.0)	(0)	(0)
Indonesian/Mollucan	-	-	55.6
Other Asian	61.1	28.6	(25.0)
Total Asia	73.4	8.8	41.1
Morocco	-	-	6.9
Other North African	(66.7)	(0)	(0)
Other African	15.4	10.0	0
Total Africa	25.0	7.7	4.2
Caribbean	-	(0)	0
Latin American	(50.0)	(0)	-
Total Americas	(50.0)	0	0
All claims	44.7%	6.7%	18.1%
N=	1,265	312	342

Note: - = no cases; figures in brackets are based on 5 or less cases.

If we first concentrate on the four main identity types, we note that status and racial identities correlate with low numbers of homeland-oriented claims and a concomitantly strong orientation towards the country of settlement. The same is generally true for religious identities, although the percentage of homeland-directed tends to be a bit higher here, and is in Britain even higher than for national and ethnic identity groups.¹⁸ National and ethnic identities usually go together with a stronger homeland-orientation, but there is quite some variation among groups here. In the Netherlands and even more so in Britain, there are several ethno-national groups who made no homeland-directed claims at all (including Caribbeans, Chinese, North Africans, and in Britain even Kurds and Turks) and others who made very few such claims (Moroccans, black Africans). The same is true for EU citizens and Roma and Sinti in all three countries. On the other side of the spectrum there are a number of ethno-national groups with a strong homeland-orientation: Kurds, Iranians, ex-Yugoslavs, Turks, and other Asians (e.g., Arabs, Afghans, Lebanese). The explanation for these high levels of homeland-orientation lie of course in the violent political conflicts and/or oppressive regimes in these migrant groups' homelands, which obviously are a cause for concern for those originating in these countries, if only because friends and relatives might be affected by them.

To what extent do these inter-group differences force us to relativize the explanatory power of cross-national differences in citizenship and integration regimes? While we do not want to deny that homeland influences and intrinsic characteristics of migrant groups play a certain role, we think there are three important reasons why these inter-group differences are peripheral rather than central to understanding patterns of migrant claims-making. The first and most direct reason can be directly read from the table: cross-national differences are not explained away by the different composition of a country's migrant population and the varying inclination of groups to engage in homeland-oriented claims-making. The national and ethnic identities part of Table 4 contains eleven ethnicities, nationalities or groups of nationalities for which we have cases available in all three countries: EU citizens, Ex-Yugoslavs, Roma and Sinti, Other Europeans, Turks, Kurds, Iranians, Chinese, Other Asians, Other North Africans, and Other Africans. For every single one of these groups, the level of homeland-orientation is highest in Germany. Thus, it cannot be argued that the strong homeland-orientation of German migrants is the result of an 'unlucky' composition of this country's migrant population. To an important extent, it is the German context that sustains, revives, and perhaps even produces strong homeland-identifications among a wide variety of

¹⁸ The relatively high figure for Germany is as the table shows due to the "Other" category and particularly to a number of homeland-directed claims by Alevites, a liberal Turkish Islamic current, which during the 1990s was

migrant groups. Kurds, Turks, or ex-Yugoslavs may be more than averagely inclined to make homeland-oriented claims, but they are especially likely to do so in a political context that reinforces such homeland identifications by putting up high material and symbolic barriers to migrants' entry into the host society's political community.¹⁹

The second reason why we should be careful not to give too much weight to these inter-group differences is that we are here to some extent 'sampling on the dependent variable': we see high levels of homeland-orientation among Kurds, Iranians, and say these are 'obviously' explained by homeland conflicts. But what about the negative cases, where we have intense homeland conflicts without much repercussions in the claims-making of emigrants from these countries? Were not Pakistan and India several times on (or over) the brink of war recently, did not Muslims and Hindus (e.g., Ayodhya), and Sikhs and Hindus (e.g., Amritsar) clash violently in India at several occasions during the period of our study? And are not Pakistan or China equally oppressive regimes as Iran? Therefore, it is not very convincing to point out that Britain has simply been "lucky" to have the majority of its migrants come from quiet regions where no significant homeland conflicts occurred that could have spurred mobilization by migrants in Britain who originate in these countries.

The third and analytically most important reason why we should not overestimate the role of interethnic differences – and here we have to refer back to the discussion of Table 2 above – is that inclusive citizenship regime such as those of Britain and the Netherlands not only affect the degree to which certain identity groups make homeland-oriented claims, but shape the very identities of these groups. As a result, Turks, Moroccans, or Pakistanis in the Netherlands and Britain to an important extent are no longer visible in the public sphere as such, but appear as Muslims, general speakers for minorities, or, in the British case, as representatives of the racial group of Asians. Similarly, most claims by migrants from the Caribbean in Britain are made under the label of blacks, and not under the flags of Jamaica or Trinidad. By bending collective identities in this way, or shifting the emphasis from one to another of migrants' multiple identities, inclusive citizenship regimes direct migrant identities away from the national and ethnic categories of their homelands. Therefore an honest comparison between the claims-making of Turks in the Netherlands and in Germany should not only look at claims made under the label of Turks, but also look at claims made by non-

at several occasions violently attacked by Muslim fundamentalist groups in Turkey. This provoked related claims in Germany.

¹⁹ Differences in the strength of homeland orientations between the Netherlands and Britain can however be partly explained by inter-group differences. Among the eleven categories mentioned in the text, there is no clear rank order between Britain and the Netherlands; depending on the group, the level of homeland-orientation is higher in the Netherlands or in Britain, or is equally low in both countries.

ethnic Muslim or minority organizations in which members of the Turkish community also participate. As Table 2 indicates, this is not likely to produce a very different picture for Germany, but it certainly would alter the perspective for the Netherlands, and would result in a greater difference in the level of homeland-orientation between German and Dutch Turks than the one found on the basis of the ethnic identification alone. Of course, since Turks become publicly invisible as Turks and indistinguishable from other Muslims or minorities as soon as they mobilize under a different collective identity²⁰ we cannot give exact figures for such a comparison, but the direction in which the result would go should be clear.

Conclusion

Our leading question in this article was to investigate the key claims made by those authors in the migration field, who have argued that transnational communities and diasporas are carriers of new trends toward globalisation, to the extent that they threaten the authority of the nation-state as the primary unit of social organization. Contrary to this extreme image of people joining hands across the globe and thereby displacing the nation-state to the dustbin of history, our empirical findings regarding migrant claims-making in Germany, Britain and the Netherlands, fall strongly on the side that sees nation-states as the dominant factor in shaping migrant claims-making in general, and the potential for, and patterns of transnational claims-making, in particular.

If transnational community and diaspora formation is to be read as an emergent trend – which for the moment remains more of an assertion than an established fact – then contextual explanation is required to show the patterns by which it is emerging, and why it is emerging in some receiving countries more than others, and among some types of migrant groups more than others. This is not to claim that the emergence of transnational claims-making is insignificant, but that its significance can only be explained in context. Instead of opposing the national and transnational, we set out specifically to show how they interact.

Our findings comparing claims-making in Germany, Britain, and the Netherlands, illustrate many of just the type of examples that populate the transnational communities and diasporas literature. Without repeating the detailed arguments that have been made in the body of the article, it is important to repeat here the main finding. There are significant cross-national differences between the levels and forms of transnational claims-making by migrants

²⁰ Except in a few cases where they mobilize a double identity such as Turkish Muslims.

and minorities, and these are best explained by the type of citizenship which a country uses for politically including migrants in its national community. Thus ethnic exclusionist Germany defines its former guestworker migrants as ‘foreigners’, and this is how they see themselves, directing their energies into ‘transplanted homeland’ affairs, much more than their British and Dutch counterparts. In contrast, cultural pluralist Britain has made significant efforts to shape its resident former colonial subjects into nationalised ‘minorities’, and they have responded by voicing their demands for further material and symbolic political gains on the nation-state. The case of the Netherlands sits between Germany and Britain, but strongly underwrites our primary thesis that transnational claims-making is best understood as a dependent variable of national citizenship. In the Netherlands, a guestworker hangover plus a state sponsorship of ethnicity and nationality as the basis for incorporation of, and resource allocation to minorities, has led Dutch minorities to retain strong identifications with their ethnicities and nationalities, albeit to a lesser extent than in Germany. At the same time, regarding the direction of the claims of Dutch minorities, they are much closer to their British counterparts, and focus strongly on their position in the country of settlement.

Interestingly then, we find transnational claims-making to be most prevalent in cases such as Germany, where the receiving state offers little opportunities to migrants to influence the policy process and symbolically excludes them from the national community. By contrast, transnational forms of claims-making were least prevalent in Britain, where the state has strongly assimilated migrants to the ‘racial minority’ categories of its integration regime. Seen from this perspective, transnationalism is not a sign of resistance against receiving nation-states’ efforts at integration and assimilation, but something that confronts those nation-states who themselves resist making migrants into citizens. The comparison of Britain and the Netherlands shows, in addition, that it matters *how* nation-states make migrants into citizens. The more outspokenly multicultural approach of the Netherlands has provided for a more favourable environment for transnational types of identities and claims-making than in Britain. Thus, multiculturalism to some extent invites transnationalism, but the turn away from this approach by the Netherlands indicates that this may not be the future trend. Ethnicity-based multiculturalism has not only led more than in Britain to the retention of homeland-directed orientations in the political sphere, but has also meant a low degree of cultural adaptation in other domains, most important of all acquisition of the Dutch language and labor-market skills. Given both Germany’s and the Netherlands’ policy changes away from their former approaches to migrant integration, we may expect the patterns of migrant claims-making in these countries in the future to move closer to the British pattern – although

certainly with remaining national differences. This implies that we may expect transnational claims-making to become less, rather than more frequent in these countries in the years to come.

For these reasons, the urge within much of the transnational communities and diasporas literature, whereby transnationalism is seen as coming 'from below' and driven 'bottom up' by migrant identity formations, really needs to be strongly relativized and made more systematic. This could be achieved by conceptual approaches that relate such processes to the 'top-down' institutional and ideological frameworks which define their significance, meaning and representativeness, along the lines of the triadic model which we have developed above. At least such an approach would allow a space for analysis to come in, a development that ought to be welcomed, in a body of literature that has so far has been high on inflationary rhetoric and rather low on critical theoretical reflection and systematic empirical evidence. While they are not completely irrelevant, our analysis shows that homeland influences or primordial attachments to ethnic, national, religious, or racial 'transnational communities', are relatively marginal to understanding patterns of migrant claims-making. Our argument for the retention of national citizenship approaches here, is not a normative one, but a factual one. Our evidence simply shows that national citizenship shapes transnationalism.

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