INTRODUCTION: THE THEORY AND PRACTICE OF CITIZENSHIP IN THE 21ST CENTURY

A Few International Trends

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The articles assembled in this issue of *Canadian Diversity* bear witness to a striking fact. All over the world, states are rethinking immigration, naturalization and integration (hereafter INI) policies. The combined effect of the changes that come about as a result of this process might be a great deal more *convergence* among states, both as regards the kinds of policies that they adopt and the problems that they will have to face in the years to come.

Though INI regimes are not the only policy tools at the disposal of governments seeking to mold a diverse society into a tolerably cohesive citizenry, their centrality has been increasingly recognized all over the world, since it is through these policies that governments can set the terms defining admission to citizenship. Indeed, as I have argued elsewhere, citizenship can be thought of as *status*, *identity* and *practice*. INI policies police the first of these dimensions of citizenship, in that they set the terms of admission to the status of "citizen." Though several articles in this collection deal with these other aspects of citizenship policy, I will focus these introductory remarks on INI policies. In this way, I will centre the discussion on the commonalities that I see emerging in countries that one would until recently not have mentioned in the same sentence in thinking about the management of diversity.

Two distinct paths

Until quite recently, the globe could be quite conveniently (though always somewhat simplistically) split between *immigration* and *non-immigration* societies. The former, among which Canada, Australia, and the United States figured most prominently, have long made it an article of faith that their economic and demographic health depends on attracting people from other countries, not as temporary workers but as permanent, full-fledged members of society. Though these countries have obviously modified their INI policy regimes over time (most notably in broadening the range of countries from which immigrants could be drawn), they have been shaped to a significant degree by the following characteristics:

- *Jus soli* rather than *jus sanguinis*: Membership in the society depends on where you are rather than on where your ancestors came from. (Note that this statement is ambiguous: it can mean that membership depends on facts about your *birth*, or about your *residence*).

- *A fairly thin national identity*: A corollary of the juridical emphasis on *jus soli* has been the adoption of a fairly thin *cultural* definition of what it means to be a citizen. Clearly, if a country wants to attract persons from a variety of other countries to its shores, it had better not make "thick" cultural markers such as religion, ethnicity, and shared history, conditions of acceptance. Membership rests upon the acceptance of liberal-democratic values and practices, and on a commitment to sharing a future rather than on a common past.

- *Multiculturalism*: Many, and perhaps even most people who move from one country to another do so to better their lives, and that of their children. But they do not generally do so out of a desire to erase their previous identities. Countries of immigration have by and large adopted one or another set of policies commonly lumped together under a "multiculturalism" rubric. Though these policies are actually quite different from one state to another, they share at a minimum a commitment to allowing immigrants to maintain some aspects of the traditions and practices of their countries of origin.

- *Easy naturalization*: Since immigrant societies are looking for new *members* as opposed to individuals performing exclusively economic roles, they have made access to citizenship rather simple, and have actively encouraged landed immigrants to acquire citizenship.

- *Multiple citizenship*: A natural corollary of the foregoing three features is a fairly tolerant attitude toward individuals who hold more than one passport. For one thing, it makes it quite a bit easier to attract people to become members of a country if you do not require of them that they abandon all allegiance to their country of origin. For another, if citizenship betokens not some deep set of cultural or religious affiliations but rather a "shallower" commitment to the values that characterize a decent liberal-democratic society, the possession of multiple citizenships need not be seen as raising the fear of disloyalty.

"Non-immigrant" societies can be seen – again with some simplification – as having made the opposite choices in terms of their INI policy regimes. They define citizenship by blood rather than by soil. They have a much "thicker," or more defined, conception of what a citizen is, which includes references to a common past, sometimes even to a particular religious heritage. They have accordingly been very resistant to accepting the idea and the practice of multiculturalism, and have either discouraged or prohibited the practice of holding more than one citizenship. They have made naturalization difficult, if not impossible.

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Convergence?

In recent years, shifts in policy have brought these two categories of societies somewhat closer together. On the one hand, immigration societies have at least begun to debate limiting the generosity and "undemandingness" of their INI policy regimes. They have done so for a variety of reasons. I will highlight three of these:

- *Fear*: The "elephant in the room" in all debates about these issues is the fear that followed the wave of terrorist attacks, beginning with the attack on the United States on September 11, 2001. Many began to fear that liberal immigration policies were bringing enemies to our shores, and that policies of multiculturalism were fostering the development and maintenance of pockets of non-integrated citizens with illiberal values and problematic transnational political allegiances. This reign of fear has led to calls to the relatively generous multicultural policies that had been adopted by countries such as Canada and the Netherlands, the thought being that they had perhaps erroneously disregarded the cultural dimensions of integration and citizenship.

- *Concerns about "instrumental" citizenship*: In Canada, the costly evacuation of Canadian nationals from Lebanon in 2006, and to a lesser degree, the realization that many Hong Kong immigrants who came to Canada in the wake of the Chinese takeover in 1999 never really intended to stay in this country, but merely desired to obtain Canadian citizenship as an insurance policy in case the new administration became repressive, led some to believe that Canada had been too generous in its naturalization policies. Easy naturalization would, in the view of some critics (represented in this collection by Martin Collacott), lead to a devaluation of the currency of Canadian citizenship. Though I use Canadian examples here to illustrate this tendency, the article included herein by Richard Bedford makes plain that such concerns are also present in an immigrant society such as New Zealand.

The ambiguity that I pointed to earlier in the *jus soli* conception between citizenship in virtue of *birth* and in virtue of *residence* becomes relevant here: though there is no suggestion among critics of excessively "multicultural conceptions of citizenship" that countries such as Canada or the United States should adopt *jus sanguinis*, the thought is that the residency requirement of citizenship may have been given short shrift. Should individuals who have not lived in the country for years and even decades still enjoy the rights associated with citizenship in an affluent and stable liberal democracy?

- *Distributive justice*: Though this concern may at present be found mainly among academic observers of immigrant societies, it is nonetheless worth mentioning the fear expressed by some progressive critics of excessively liberal policies in the area of immigration, naturalization and integration that the diversification of society would over time lead to an erosion of the kind of economic solidarity that a shared identity makes possible. The fear is that the institutions of distributive justice that characterize some immigrant societies such as Canada and Australia might become unsustainable. A call for "less multiculturalism and more cultural integration" can thus be heard from social-democratic voices.

On the other hand, many erstwhile non-immigration societies have significantly liberalized their INI policies. I will highlight two factors that have contributed to this process.

- *Gastarbeiters* (guest workers): Many erstwhile non-immigration countries have realized that while remaining monocultural *de jure*, they were in fact increasingly multicultural *de facto*. The case of European countries such as Germany and Italy are exemplary here

(and they are discussed in these pages in articles by Faist and Codini). Having brought great numbers of temporary workers in to occupy economic roles that nationals of these countries no longer wanted to perform, but without the intention of ever including them as full members, they have found themselves with communities of "temporary" economic migrants who were temporary in name only. They have had children, and now often grandchildren, and have in many ways established themselves as *de facto* members. This has given rise to the perception that both for practical and for ethical reasons a path to full inclusion had to be traced for these hundreds of thousands of people. As pointed out in several papers here, this has led to the integration of elements of *jus soli* to INI regimes that were previously almost entirely based on the principle of *jus sanguinis*. It has also given rise to a timid affirmation of some degree of multiculturalism in countries that had previously viewed the idea as anathema.

- *Europe*: The emergence of Europe as a political entity has, for a variety of reasons, caused countries to move away from the kinds of INI policies that characterized "non-immigration" societies. First, and most obvious to anyone who casually strolls the streets of Paris, London, Madrid and other great European cities, the almost complete elimination of borders between European countries and even more so among countries within the Schengen space has led to a great deal of internal migration, so that these countries are, to a significant degree, transnationally European, at least in their urban cores. Second, countries aspiring to EU membership have had to adopt, as a condition of acceptance, regimes of minority rights. The irony of countries that until very recently would never have considered such policies, and that (at least in the case of France) only apply them extremely meekly within their own borders, yet impose such demands on candidate countries, has been pointed out by more than one commentator. It remains that this is another way in which the rise of Europe has contributed to the erosion of non-immigration INI regimes. Finally, the erosion of national borders means that, as it were, all European countries at least inherit *de facto* the INI regimes of the EU's least demanding Member States. Indeed, as any person acquiring citizenship in a European country acquires, as a result, European citizenship, the prohibition of multiple citizenships will become difficult, if not impossible, to enforce.

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The concerns that have led immigration societies to begin contemplating a certain retrenchment of their INI regimes have also been present in many non-immigration societies. Thus, the trends that have just been described have not been unilateral. I would argue, however, that opening INI regimes among (formerly) non-immigration societies constitutes the *tendance forte* that has been at work in these countries.

Towards a global conversation?

This very crude and simplistic picture suggests that a dialogue on best practices and policies is going to become possible among countries that until recently had very little to converse about, as far as INI is concerned. (Indeed, this issue of *Canadian Diversity* might be seen as the beginning of such a conversation.) As INI regimes come to differ more as a matter of degree than of kind, common problems, and perhaps even common solutions, might begin to emerge. As an example of what such common solutions might look like, I would like to refer to Rainer Bauböck's article on citizenship as "stakeholding." It is possible that as immigration societies try to counter the trend that according to some has led to a cheapening of the value of citizenship, they will come to emphasize the "residency" component implied in the notion of *jus soli* to a greater degree than they presently do. Short of stripping people of rights if they do not reside in the country that granted them citizenship, they might come to see citizenship as a bundle of rights and obligations that do not all have to go together. Absence might legitimately warrant the temporary removal of certain rights, such as the right to vote. (Many countries already place a time limit on the right to vote for non-resident citizens). Similarly, erstwhile non-immigration societies that are at present arguably saddled with unstable and perhaps even incoherent congeries of *jus soli* and *jus sanguinis* may come to give pride of place to residency as a determinant of the rights of citizenship. And though residency is not synonymous with the notion of "stakeholder" put forward by Bauböck, it seems clear that that notion at least encompasses those persons who reside on the territory of a state. (At what point a person should be taken to merit the designation of "resident" is obviously a difficult issue that will have to be taken up by policy-makers and theorists alike).

Similar debates on the meaning of citizenship and on the requirements of social solidarity will also become possible as the terms of debate are understood in the same way by an ever-increasing number of countries.

A cautionary note

Having painted an optimistic picture of the prospects for dialogue on INI regimes, I must, however, end on a downbeat. It will not have escaped attention that with the exception of Rajeev Bhargava's essay on India (which deals with India's dizzying internal diversity rather than with diversity brought about through international migration), all of the essays included in this collection have to do with countries of the developed world. Despite misgivings that some in these countries (and among the authors collected here) might have about specific aspects of INI policy in this or that country, it would take some willful blindness to deny that these countries have been net beneficiaries of the international migration that has characterized our globalized planet. They have benefited economically in myriad ways, bringing in workers at all levels of the economic ladder, from unskilled Turkish *gastarbeiters* to highly trained Kenyan doctors. And they have benefited culturally as well, through the dynamism and creative tension that the infusion of new ideas and ways of doing things invariably brings about.

But this trend has arguably left many countries in the developing world worse off. Families have been torn asunder. In the case of the Philippines, significant gender imbalances have been created by the mass exportation of caregivers to developed countries. And brain drains have been caused by the realization on the part of many developed countries that it is cheaper to import fully trained professionals from other countries than to train them domestically. So while there is significant migration from developing countries, it is most often the migration of desperation rather than of choice, brought about by famine, poverty, civil war, and natural disasters. While these migrations do undoubtedly cause cultural difficulties, the expenditure of intellectual energy to resolve them seems a luxury given the urgency of the basic unmet needs of so many of the developing world's refugees.

The massive global inequalities that exist between countries of the developed and developing worlds with respect to the costs and benefits of widespread migration is surely an issue that must capture the attention of scholars and policy-makers wanting to understand the ways in which globalization, and global migrations, continue to shape our world in ways both good and bad.

Observers of the evolution of citizenship around the world will want to pay careful attention to developments in the poorest countries of the world. Mass migrations occurring there are giving rise to increasing numbers of refugee populations with no clear membership in *any* polity. If we agree with Hannah Arendt that the right to citizenship is the most fundamental of all rights because it is the right to *have* rights, this trend will appear to be a very worrying one indeed.

Conclusion

I have focused in this short introduction on an aspect of citizenship that has been at the core of dramatic changes both in "immigrant" and in "non-immigrant" societies, and that raised the possibility of policy convergences that would have been unthinkable only a few decades ago. It has to do with the range of policies through which membership is governed.

There are of course other aspects of citizenship policy that have been at the centre of fascinating developments, both theoretical and practical. Citizenship can be seen as a *status*, as an *identity* and as a set of *practices*. Many of the papers in this collection deal with the first of these dimensions of citizenship, and I have concentrated my introductory remarks on the themes that they raise. The connection between citizenship and identity has also been complicated by transnationalism in many interesting ways that are developed in this collection in articles by Jedwab, Dib and Donaldson, and Wong. Finally, the perennial theme about how practices of citizenship can be promoted in increasingly diverse mass societies is taken up in several articles, most notably by Bevelander and Spång, Omidvar, Bloemraad, Foner, Bozec, and Moya. Clearly, the rapidly evolving area of citizenship studies will have to develop on all three of these research fronts in order to meet the demands of an increasingly complex set of social realities, which have been bundled together under the rubric of "citizenship."