The Ironies of Citizenship

Naturalization and Integration in Industrialized Countries

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Introduction

The Politics of Granting Citizenship

But when they had bound him with the straps, Paul said to the centurion..., "Is it legal for you to scourge a Roman, and that without trial?"

When the centurion heard this, he went to the tribune and reported, saying, "What art thou about to do? This man is a Roman citizen."

Then the Tribune came and said to him, "Tell me, art thou a Roman?"

And he said, "Yes."

And the Tribune answered, "I obtained this citizenship at great price."

And Paul said, "But I am a citizen by birth."

At once therefore, those who had been going to torture him left him; and the tribune himself was alarmed to find that Paul was a Roman citizen, and that he had bound him.


When antiforeigner demonstrations with fire bombings and eight murders occurred in Germany in 1992 and 1993, Chancellor Helmut Kohl expressed outrage, but he also said he understood why many native Germans were frustrated with asylum laws and could resort to violence. Although many foreigners were second- and third-generation descendants of guest workers who lived in the country all their lives and who spoke only German, native Germans received the message that their attitudes toward foreigners had some legitimacy. The first Turkish-German representative in the Bundestag, Cem Özdemir, asked why Kohl did not meet with the families of the victims (1999, p. 109). However, the reasons are clear to political analysts. Few guest workers could vote, support candidates, organize political opposition, or hold office (Green 2004, p. 85). If they had been citizens, Chancellor Kohl would have worried about their vote, opinions, and opposition. But with so few of them being German citizens, the Chancellor could afford to give them little regard. Further, when many of these foreigners can be easily deported, especially in a context of fear of terrorism, citizenship would have provided them with peace of mind. Clearly, citizenship achieved through naturalization or birth on native soil matters.
The nationalities and naturalization policies of a country are important gauges of how society accepts or rejects foreigners and long-term residents. Countries with high naturalization rates react more strongly to antiforeigner attacks and murders. Their reactions are different because naturalized immigrants can vote, organize, and protest. In France in the 1980s, conservative parties backed by Le Pen’s nationalist attack from the radical right challenged the *jus soli* principle. They enacted stricter naturalization policies, especially for *jus soli* citizenship. However, students and naturalized immigrants worked together through *Racisme* and other groups to prevent the government from enacting more anti-immigrant demands. When the Socialists regained power, they reversed the *jus soli* decision and went in a more liberal direction (Howard 2009, pp. 149–54; Feldblum 1999; Brubaker 1992, pp. 148–51). In Canada where the highest naturalization rates prevail, few if any naturalization restrictions, are bombings, or murders are seen.

The key difference is that countries with liberal nationality laws lay the case for political organization of immigrants so they can protect themselves and pursue their own livelihood; countries with restrictive naturalization policies make it nearly impossible for immigrants to politically protect themselves. Immigrants have to rely on the kindnesses of strangers (citizens unlike themselves) to protect their homes and families. Thus, naturalization can make a difference in everyday lives and can actually be a matter of life or death.

In the last four decades, naturalization rates in advanced industrialized countries, including both naturalizations and citizenship by birth to foreign parents (*jus soli* births), have varied widely. From 1970 to 2005, naturalizations per 100,000 foreign residents averaged more than 11,000 citizens in Canada compared to 840 citizens in Germany. The most open country’s naturalization rate was more than ten times larger than the more closed country. From 2005 to 2006, the rates were 1,530 and 2,200 for the same two countries. Still a massive difference! In open countries, immigrants can quickly become citizens, vote, and form interest groups; in more closed countries, immigrants rarely vote and are subject to deportation if they lose their jobs or get in trouble with the law. In open countries, immigrant children born in the receiving country have citizenship according to *jus soli* principles, whereas in closed countries, such children may have to wait until adulthood for naturalization, which can be a process fraught with difficulties. Why do such massive and long-lasting differences in naturalization exist?

Enthusiastic or reluctant offers of citizenship to aliens take place through institutional processes involving state interests. For instance, Rome used citizenship to integrate conquered lands, and Michael Mann speaks of the “invention of extensive territorial citizenship” as the “decisive edge,” giving Rome a political advantage over Carthage and other competitors (1986, p. 254; 2003, p. 10–11). States that openly grant citizenship do so for a reason. The Roman

Natalization rates have been recently collected in a more reliable form but are still contested. The approach used here as well as other approaches are discussed in Chapter 2.

and British Empires wanted to stabilize their holdings, and settler countries like Canada and the United States wanted to find people to work the land and control indigenous people. As Oliver Wendell Holmes said of Americans: “[W]e are the Romans of the modern world – the great assimilatory people” (Egen and Siegel 1993, p. 295). Other countries without such interests rely on blood descent or require immigrants to navigate a difficult maze.

Extending citizenship to a wide range of foreigners results in part from the enduring effects of a double irony of colonial relations and left politics. The first irony is that by conquering nations and offering political and economic incentives to secure the partial allegiance of conquered peoples, colonizers inadvertently expand diversity, tolerance, and citizenship. Over the long run, the oppressing country becomes more civilized. This approach stresses transforming colonized natives into cooperative allies, leading many to migrate and naturalize in the receiving society. Although settler countries are begun by colonizers, they obtain independence and deprive native and indigenous people of their rights and land, create a labor shortage, then offer citizenship rights to immigrants whom they invite to fill the labor force needs of their new nation-state. After this initial internal repression, settler countries eventually become more open to new immigrants, to foreign influences, and much later, to indigenous and colonized peoples whom the settler countries repressed. Major colonizers like the United Kingdom and France represent one side of this irony; the Anglo-Saxon settler countries represent the other.

The second irony is not directly connected to colonialism but flows from the changing nature of class and left politics. Left parties and trade unions often oppose immigration, but the social basis of much of their power has eroded as the manufacturing sector has declined and the service sector has expanded. Left parties must find new constituencies and issues; these have come from women in the labor force, most often in the service sector, and development of an international human rights regime with new asylum policies after World War II. This recent irony comes from left parties welcoming newly naturalized citizens, especially in Nordic countries where naturalization rates are high.

Mechanisms of these ironies can be seen in the embedded power resources of class and status over the last four decades, leading to legal institutions that explain year-to-year naturalization rates. Left party power and allied green party support provide the impetus for passage of most naturalization laws that allowed for greater integration of strangers. For instance, the culmination of left party power in the Nordic countries over 30 years explains their greater naturalization rates, whereas year-to-year left party power combined with green party influences lead to stronger naturalization laws in the remaining settler, colonizer, and even noncolonizer countries. These nationality laws, largely created through legislation but sometimes through executive regulatory changes, will be measured by an index of barriers to nationality consisting of twelve characteristics including residency requirements, *jus soli* provisions for children born in the country, language requirements, and dual nationality. This is the first statistical study of these mechanisms of naturalization over time,
and statistical explanations will be backed by historical case studies comparing similar and different countries in six separate chapters.

Thus, by looking at the colonization experience, making international comparisons explicit, and embedding institutions into year-to-year causal processes, this book presents a political-institutional model of nationality explaining the ironic processes of integrating strangers into society. Unlike some scholars who find transnational citizenship evolving or others who see convergence emerging, this work emphasizes distinctive political and institutional factors of each of these countries as they operate within long-term institutional constraints. As such, this work uses a political and institutional model based on state mobilization through war, colonization, and settlement, and in more peaceful times, through class, ethnic, and gender group interests expressed through left and green parties.

Theories of Nationality Are Not the Same as Those of Immigration

Naturalization theories are underdeveloped in two ways—they are either ignored, or they are confused with theories of immigration. First, T. H. Marshall in his seminal work on citizenship in the 1950s (1964) hardly mentions naturalization. Christian Joppke at one point questions whether a general theory of immigration and citizenship is possible (1999b, p. 633; 1999a). Although one prominent group of theorists in a comprehensive review of international immigration proclaims that “the means, mechanisms, and policies by which immigrants adapt to and are incorporated within receiving societies” are of “clear and unambiguous importance,” they gloss over explanations of nationality and naturalization, as do many others (Massey et al. 1998, pp. 3, 8–14; Cornelius and Rosenblum 2005). Of the theories mentioned above, Brubaker’s (1992) cultural idioms explanation of France and Germany was the first direct theory of nationality and naturalization.

Second, immigration theory is mistakenly seen as being able to explain nationality and naturalization in three ways. First, demographic or economic theories frequently point to the state and economy needing people and specifically workers. This is a good explanation for immigration, but not for naturalization. State support for naturalization is only needed if immigrants do not want to come in the first place, or if integration is a problem because immigrants form an underclass, creating a divided society. If these two factors are absent or ignored, the state can accept immigration but refuse to grant citizenship. Second, social mobility possibilities may be severely restricted in the sending country. Although this may promote immigration, it does not mean naturalization will increase, decrease, or stay the same. A receiving country may continue to treat immigrants as “guest workers” and refuse to integrate them. Despite the presence of many immigrants, they may be under threat of being sent back to the sending country (Switzerland actually sent many back). And third, immigrants may lose land or inheritances in their home country if they naturalize (Mexico, India, and Turkey recently relaxed these rules). Thus, foreigners may immigrate but never consider naturalization a viable option.

Political repression and economic conditions in many sending countries have led to asylum and refugee regimes in receiving countries. But refugee policies are rarely connected to naturalization policies, especially because many countries would like to send refugees to a third country or back to their home countries when things get better. As a result, countries may accept or strongly resist, and refugees may accept assimilation or return home when conditions improve. Clearly, there is a disjunction between explanations of immigration and naturalization, and later analysis shows that even though naturalization logically flows from immigration (i.e., most people have to migrate to be naturalized), they are not correlated. Thus, theories of immigration and refugee policies, despite many claims, do not transfer well to nationality or naturalization.

The theoretical approach developed in this work has three parts. First, colonization works itself out over the centuries in surprising ways, and it produces a regime theory represented by (1) colonizers subjugating peoples who then immigrate to the mother country, (2) settler countries whose indigenous population decline causes labor shortages solved by immigration and naturalization, and (3) noncolonizing countries, some of whom may have brief and repressive occupations of colonies, have little reason to accept immigrants. The second theory focuses on year-to-year change over 37 years using left and green party power based on class and status resources but still embedded within each original regime type. Left politics concerns settler, noncolonizer, and the relatively new Nordic regime type where cumulative left politics has changed from a dominant class basis to a more class, ethnic, and gender foundation. And third, a theoretical minor key concerns how a country’s nationality policies fluctuate over time within its regime type. The next three sections explain these theories in more detail.

Explaining Institutional Regime Causes of Nationality Rates over Centuries

Massey et al. say that “international migration rarely engaged the interests of theorists working in the historical-structural tradition” (1998, p. 33). But
there has been increasing interest in sociology and political science on nationality at the macrolevel (Hollifield 1992, pp. 19-41, 2000; Joppke 2005). Three perspectives explicitly target long-term causal mechanisms that bring about differential naturalization processes: (1) demographic and economic theories, (2) the cultural idiom approach, and (3) political economy theories based on colonialism.

The first major approach involves demographic and economic theories that move from the individual to the country level of analysis by stressing labor market needs. In the economic push theories, the economic wealth of the receiving country and the poverty of the sending country produce a strong incentive for sending the country’s residents to the wealthier country. For economic pull theories, labor shortages in the wealthier country produce a need for workers that immigration can fill (Ritchey 1976, pp. 364-75; Petersen 1978, pp. 554-6; Stahl 1989; Molho 1986; Massey 1988). The push-pull framework can extend to other factors such as services, public assistance, and racial equity (Ritchey 1976, pp. 375-8). Adapting this theory to naturalization adds a pressure factor—the more immigrants who enter the country and the longer they stay, the more they will naturalize. While the pressure or “being there” factor lacks a political component because it only focuses on economic needs, a receiving country’s wealth does create an incentive for immigrants to naturalize.

Related to this theory are demographic models where immigration results from size of countries, crowding, and the distance migrants travel (Molho 1986, pp. 105-7; Massey et al. 1998). Population density in the immigrants’ country of origin would be a push factor toward naturalization, but population density in the receiving country has a negative effect. Countries with high population density often claim that their lands are too crowded to allow for increased immigration. This theory has a political component because it claims that the state passes laws to prevent further immigration and to make naturalization difficult. But crowding and distance models are clearly not as important as demographic decline explanations. From 1880 to 1950, demographic decline fit France, and the political component appeared with strong advocates for immigration and naturalization. Whereas other countries arrived at demographic decline much later, nearly all advanced industrialized countries now experience declining birth rates. Consequently, the inherent labor shortage similarities cannot explain large differences in naturalization rates. Hence, demography often poses the problem but does not explain the many and highly variable approaches to naturalization.

The second major approach uses culture to explain why some countries are open and others reluctant to accept strangers and their children. Brubaker’s work (1992, 1989) on citizenship and nationhood uses a “cultural idiom” approach (i.e., ways of thinking and talking about nationhood). He demonstrates that cultural idioms formed in the crucible of the French Revolution or developed indigenously over time in Germany. The French Revolution transformed “belonging” to French society into active participation based on rights and obligations, which fixed citizenship upon the nation-state. Prior bases for rights in terms of belonging came from the cosmopolitan aristocracy in the ancien regime. Modern citizenship began with an act of closure upon the French nation-state. Those who opposed the state were executed and citizens were conscripted to protect the republic. This cultural crucible created the French approach to universality that allows nearly anyone who assimilates and supports French cultural and political norms to become a citizen. Consequently, French naturalization rates are considered high for a densely populated European country, and the legal principles of jus soli (birth on national soil) predominate over jus sanguinis (blood descent) (Brubaker 1992, pp. 33-49).

Germany did not have a leveling revolution, and citizenship was connected to the estate or Stand, which was highly particularistic rather than universalistic (Brubaker 1992, pp. 50-72). As the estate developed into the Ständestaat, multiple legal systems carried community-based notions of belonging in particular regions. The focus was inward with the most extreme example found in German “home towns,” which have anthems and restrict jobs to residents (Walker 1971). Although legal development occurred within and between numerous German states, laws toward the German poor developed with considerable closure toward the alien Poles and Jews. The end result was a long-lasting and active system of jus sanguinis that brought millions of dispersed Germans (Ausseidler) back from an eastern European diaspora. Until recently, the German system lacked the legal principles of jus soli, and discouraged citizenship for Turkish guest workers and their children.

Brubaker’s theory is well argued as a macro-social explanation of naturalization, but his long-term causal mechanism is vague and open to question. Searching for the genetic code of citizenship policies lacks force as an argument because it looks at unique events that must have a continuous effort over centuries. Where are the developmental mechanisms, and who are the agents acting them out? This lack of theoretical specificity invites the reader to look to other historical periods for other cultural idioms. Thus, one may examine the

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5 Cheryl Shanks’ (2001) approach to immigration in the United States politics uses an idea-based approach. But her focus on public interest and policy arguments in one country relies on major wars.

6 Heike Hagedorn (2001) argues that cultural idiom theory has three weaknesses: (1) the regional disparities in France and Germany are greater than between-nation variation, (2) France is not as open as Brubaker claims because it denies many citizenship applications, and (3) politics plays a stronger role than cultural idioms. Further criticisms include (1) other periods can provide different cultural idioms, (2) divergent neighbors may explain policy (e.g., Poland vs. Algeria), and (3) divergent birth rates and military conscription are stronger than Brubaker indicates.

7 One might see cultural idioms that French are a product of fusion, whereas the Germans are a product of segregation. The French Revolution reenacted the struggle between Frankish nobility,
early state in each country to find other universalistic or particularistic idioms for the state’s acceptance or rejection of immigrants.

In addition, a theory based on uniqueness does not provide guidance in explaining naturalization in other countries. Only the French had the French Revolution, but what explains more open citizenship policies in the United Kingdom or the closed policies in Japan? Cultural idioms are idiographic and provide little guidance for explaining other countries, except for looking to each country’s unique historical development. This may lead people to claim that causal analysis is not really possible. Brubaker states that citizenship debates are more about the “politics of identity” than the “politics of interest” (1992, p. 182). But these two questions are more intimately related than Brubaker claims, and “who has what identity” critically depends on “who gets what resources” and “how they are obtained.” The next theory addresses these questions.

In the third approach, Gary Freeman considers the political economy of immigration and racism with an argument easily translated to explain naturalization rates. Pierre Messmer describes “colonization in reverse”: “This is the trap set by history... We in France and Europe have been accustomed to colonizing the world” and “now the foreigners are coming here to us” (Freeman 1979, p. 20). Freeman states that the British did not restrict the entry of colonial subjects until 1962 and that “one may interpret much of postwar immigration policy in Britain as an attempt to remove rights of citizenship too generously extended during the colonial period” (1979, p. 38).

Freeman indicates that certain aspects of colonialism are important: how much the colonizer portrays its culture as universalistic (for everyone including natives) or particularistic (only for the colonizers), and whether the colony was incorporated into the nation-state or commonwealth, allowing greater contact and employment opportunities in bureaucracies and government agencies (e.g., the Indian railways). The closer colonies are to the colonizer in economic, political, and cultural terms, the greater the immigration, integration, and naturalization possibilities. Thus, Freeman’s theory of empires offers a good opportunity to explain long-term naturalization and added explanations based on the settler and noncolonizer countries. Using Freeman’s institutional insights, the next four sections present nationality regime theory consisting of colonizer, noncolonizer (including occupier), settler, and Nordic regimes.

Colonizing Countries
States colonize through war and conquest. The longer the colonization effort lasts, the more problems the colonizer will have with social control. As the colonizer tries to control the colony by incorporating natives into the bureaucracy and military, they begin a long process that leads to native citizenship (Headrick 1978). The colonizer gradually offers citizenship to the native population in order to control the colony. Colonizing countries will be more open, allowing colonial natives to become citizens when they express their values as universal and available to natives, provide natives with education and positions in the bureaucracy, and enlist or conscript natives into their armies, allowing them to fulfill the duties of empire for which they can claim rights. For naturalization to occur in large numbers, colonial natives must first assimilate into the colonizer’s culture and support colonizer values. For instance, the Portuguese in Angola issued assimilado identity cards in a formal effort to assimilate natives irrespective of race (Albertini 1971, pp. 517–23). The Belgian process for évoulés was similar. Eventually the colonizing country will have greater racial and ethnic diversity, and colonized natives will make more demands to extend citizenship. Although this process involves considerable conflict and discrimination, the eventual result is an extension of citizenship to immigrants in the motherland. The development of citizenship occurs in five long-term stages: repression, colonial control, education, military service, and eventual migration.

First, in the repression stage, the military forces colonization on a country, often with a divide and rule strategy. This stage creates intolerance and closure toward external ethnic groups. A country that only experiences the repression stage is an occupier, not a colonizer. The occupier does not go through the full citizenship process of colonization.

Second, in the control stage, the colonizing country needs its troops elsewhere and/or gradually realizes that military occupation of the colonized country is very expensive. The colonizer must first pacify armed resistance throughout the colony, and then co-opt natives to police and administrate the colony (Betts 1985, pp. 47–75). Killingray is less complimentary in saying that European troops were “often confined to cantonments” where troops “experienced long periods of inactivity and boredom” leading to drunkenness and venereal disease (1999, p. 7; Peers 1997). Both high cost and debilitating vice were certainly factors, and after generations passed, this process of colonization led many natives to realize the benefits of cooperation with the occupying authorities and the futility of overt resistance. At this stage, many talented and

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8 Joppke states that “these factors are interwoven in unique, complex, and interactive ways” and that “it would be futile to dissect them as independent variables for the purpose of a more rigid causal analysis” (1994, p. 48). However, one might derive ideal types of universalistic citizenship (jus soli) and folk national identity (jus sanguinis) from Brubaker’s two case studies. While this extrapolation is possible (Zolberg 1999, p. 92), it contradicts Brubaker’s stated theory of cultural idioms.

9 This theory was first put forth with cross-national tables in Janoski and Glennie (1999) and in Janoski (1998). It was put into a larger contextual framework in Janoski and Wang (2005), and additional support was provided in Janoski, Lepadatu, and Diggs (2003) and Janoski (2009).
connected to colonization and the state's position in the world system. States that do not colonize during this period generally have domestic problems or have recently unified (i.e., within the last 100 years).

But the lack of colonization argument may only be half the story. Each noncolonizing country experienced emigration of its citizens not to a colony but to a foreign country. As emigration increases, many remaining natives shift their identity, unlike citizens of colonizing countries. When former citizens reject their homeland by emigrating and the state does not develop colonies for the praise and glory of the empire, remaining citizens try to rationalize the rejection and lament their weak state and economy. Also, elites push for and masses generally accept greater state control to promote economic growth and political power.

Blocked from colonization while emigrants abandon their country for another, many of the remaining citizens question their national identity and become susceptible to nationalism. Although this might lead to war, it most certainly leads to closure on national identity through an intensifying solidarity of cultural and ethnic purity. This is fertile ground for ressentiment, which Liah Greenfeld says develops from the "fundamental comparability between the subject and the object of envy" and inequality that "rules out" a noncolonizing nation-state's (e.g., Germany) equality with a stronger colonizer (e.g., the United Kingdom) (1992, pp. 15–6). This leads to a "transvaluation of values" where rationality transforms envy into romantic nationalism. Thus, a significant segment of society feels weakened by emigration and looks at immigrants as the final insult to national identity. As a result, open nationality policies would dilute and thus threaten the nation.11

Given these national identity processes, group interests create resistance to granting citizenship to foreigners. If native groups succeed at restricting immigration and naturalization when emigration is high, middle and lower classes can turn emigration into opportunities for social mobility with greater social solidarity and better wages through less competition. Ressentiment also reduces the total demand for legal, political, and social rights (Janoski 1990, 1998). Driven to its extreme, immigration avoidance can turn into persecution and forced emigration of religious and ethnic minorities. Thus, lack of colonization leads to a narrow definition of who can be a citizen, and it might also help explain the loss of citizenship rights. In sum, noncolonizing countries will avoid open nationality policies because they express their values in a particular way, avoid recruiting foreigners into their armed services, stress cultural and ethnic purity because of emigration, and generally lack national security reasons to integrate foreigners.

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10 Daniel Pipes describes this process in the Islamic empires: "Military slaves... as professional soldiers and power officials... have their own power base and opportunities far beyond those of other slaves. Their military role gives them a means of escaping slavery... and they regularly exploit it" (1981, p. 18; Erdem 1996). Thus, military service leads to manumission in the case of Islamic slaves.

11 Threats to national culture can be real. A number of languages are near extinction (e.g., Yei has 1,000 speakers; Kanum, 320; Moraori, 50; Votic, 20; and Ubykh, only 1) (Dorian 1989; Wardhaugh 1987; Finland 1994, p. 2; UNESCO 2003, 2009). The Endangered Languages Foundation and the UNESCO Intangible Cultural Heritage section were set up to protect these languages.
There are three types of noncolonizers or occupiers: (1) briefly colonizing countries that only experienced the first stage of repressive occupation, (2) once-occupied countries that never colonized, and (3) a few states that were neither colonized nor occupied. The occupiers were Germany, Belgium, Italy, and Japan.\(^\text{12}\) They avoided immigration from lands they had briefly conquered and had the added complexity of losing wars and protecting their ethnies from destruction or dilution. Although one could say that each of them had colonies so they must be colonizers, being a short-term occupier is worse than not colonizing. Never getting out of the military occupation stage and never having long-term interaction with colonial natives cause occupiers to be even more closed to foreigners. The second category applies to Ireland and Finland—states that gained independence in the twentieth century after being beset by empires. Ireland has had massive emigration but no mass immigration, and its diaspora policy for former Irish nationals had a repatriation process similar to the ethnic policies of the Germans. Finland keeps immigration inordinately low because of the massive migration potential of Russia. Only Switzerland is in the third category of noncolonizers: it had no reason to naturalize foreigners and actually sent many guest workers home.

**Settler Countries**

Once-colonized settler countries develop inclusive citizenship rights resulting from settler interests in territorial expansion, removing the rights of indigenous peoples, and alleviating the subsequent labor shortage with immigration. Eventually, countries that develop through permanent settler colonization become the most receptive states toward immigrants of diverse races and ethnic groups.

Development of open immigration involves persecution of indigenous natives—Native Americans, Maori, Aboriginals, Saami, and others (Connor 1972; Wilmer 1993). Early settlers’ denial of property rights to indigenous peoples creates a “national security threat” that makes the settler group vulnerable to indigenous rebellion. As settlers take more lands from indigenous people, a labor shortage requires immigrants to work the land.\(^\text{13}\) However, the settler country needs more than one immigrant for each displaced indigenous person because the settler culture uses land more intensively and densely

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\(^{12}\) Germany had colonies in Africa and Asia for a short time. This occupation rather than colonization was too brief to impact nationality (Drexler 1986; Debrunner 1979; Gann and Duigan 1977; Stoecker 1983). Reportedly less than 1,000 Africans actually set foot on German soil before World War II. German migration to Eastern Europe and Russia does not constitute colonization because these areas were never under the long-term control of the German government (Friesen 1978; Stump 1973). And while Steinmetz (2007) emphasizes the diversity of German colonies, the impact of this diversity on Germany’s naturalization processes was nil. Japan and Italy failed to get past the occupational stage, and Belgium registered a decade of colonization beyond occupation but this pales in comparison to the centuries-long experiences of other colonizers.

\(^{13}\) Settler displacements of indigenous peoples operated in diverse ways by country. For instance, the Australian Aboriginal mode of production is very different from the American Navajo.

than indigenous people. The ethnic security threat is largely solved by obtaining immigrants for newly conquered lands; both shortage and security problems are quickly drawn into the nation-building process of economic growth, policing, and conquest. These factors draw increasing immigration from the colonizing country, continental neighbors, and later from the rest of the world with the promise of citizenship (Weaver 2003; Wilmer 1993; Burger 1987; Thornton 1991, 1994; Sheehan 1973). For example, the Anglo-Saxon settler colonies eradicated large segments of indigenous populations, opened up vast areas of land, and then filled the perceived terra nullius (i.e., empty lands) with immigrants. This decline in indigenous peoples led to high levels of immigration and naturalization.

Many ideologies have developed about settlement processes; some about offering a “safe haven” for the poor and persecuted, others about the contributions of immigrants to building the nation. Once social institutions and political ideologies support open immigration and naturalization policies, they become nearly unstoppable. Settler country institutions are even more lasting than those of colonizing countries. When natives protest immigration because of economic and cultural competition, “the nation of immigrants” and “huddled masses” ideologies protect against assaults on immigration (just as imperial ideologies in the colonizing countries protected ethnically diverse immigrants). Group guilt is sometimes used as an argument—“And where did your ancestors come to this country?” But long-standing institutions and ideologies guide the state as labor shortages fade. Arguments that capitalism benefits from immigration because of increased labor competition have some merit at certain times; however, the interests of capital cannot explain the failure of employers in the noncolonizing countries to demand the same advantage.

After settler countries are established, immigration in the short-term creates competing status groups, disrupts social demands of native groups, and depresses wages for native groups in some labor markets (Briggs 1992; Hollifield 1992, 2000; Layton-Henry 1992; Freeman 1979). Native workers (i.e., immigrants settled for at least one generation) may have opportunity for social mobility because immigrants will usually take low-paying jobs, but they must be willing to pursue this mobility. Wages tend to drop to immigrant levels for those who do not. The country as a whole (with the major exceptions of indigenous natives and downwardly mobile minorities) tends to benefit from immigration through higher economic growth. Third- and fourth-generation immigrant citizens, now natives in settler countries, pursue social policies that benefit them more than current immigrants and may oppose extending universal policies (lack of closure begets lack of solidarity). Political and social divisions resulting from a lack of closure will lead to lagging citizenship rights relative to other countries (Janoski 1998, pp. 235–6). Indeed, offering full social and participation rights to foreigners during mass immigration would be expensive. Thus, social rights in settler countries develop slowly and are guarded by means tests (Esping-Andersen 1990; Janoski 1998).
The Ironies of Citizenship

The permanent settler model fits Anglo-Saxon settler colonies – Australia, Canada, New Zealand, and the United States – and although settler countries restricted the numbers and economic status of Asian immigrants, they eventually lifted these restraints and many Asians have gained citizenship. Since then immigration has increased from Asia, the Caribbean, South America, and Africa.¹⁴

Nordic Countries

A later and less institutionalized regime type concerns Nordic countries that were noncolonizers. Although they had little immigration before the 1970s, Nordic countries liberalized their asylum, refugee, and immigration policies toward non-EU countries to create naturalization rates higher than noncolonizers and nearly as high as most settler countries. This is an important example of historical institutions not receiving reinforcement (i.e., breaking path dependence), which creates a new regime type from a group of noncolonizing countries with a weak mixture of colonization and settlement. Sweden and Denmark had empires three to five centuries ago (before the 1870 cutoff date for empires in this work), and all four Nordic countries have small indigenous populations (i.e., the Saami or the Greenland Inuit). But colonization and settlement are too weak to have a regime effect. Instead, the Nordic regime type is rooted in social democratic politics, to be discussed more fully in the next section on theory.

This four-part nationality regime approach to long-term institutionalization of nationality has similarities with five recent developments in this area, but it avoids some of their problems. One problem with four of these models is the stated or implied positioning of countries in more than one category. This can be seen in Castles and Miller (2009), where the United States is in three categories and the United Kingdom in two; and in Faist (2000, 1996) and Baldwin-Edwards (1991), where France is in two different categories.¹⁵ Kostakopoulou (2001, 2003) uses an EU model based on civic registration category, which does not differentiate between EU countries. Soysal’s incorporation models (1994) focus on how immigrant interest groups interact with the state, but her study only hits upon four countries. In a sense, the nationality regime approach used here is close to three of Castles and Miller’s “models” (imperial, folk and multiregional) and Joppke’s (2003) “immigration constellations” (postcolonial, diaspora and settler), but the main difference is that the nationality regimes are focused on naturalization (rather than immigration or interest groups) and a sustained effort is made to show that these nationality regimes are based on measured variables that show how much a country fits each regime (rather than being typologies with descriptive backing).

One very recent approach by Mark Morjé Howard uses part of this book’s nationality regime types (2009, pp. 37–51). While Howard is very careful not to call his approach a theory of naturalization or citizenship, he focuses on the impact of colonialism and early democratization. The derivation of his theory is not indicated, but he does provide an argument for the impact of colonization on nationality laws (but not on naturalization rates). Because his argument does not make a distinction between the four stages of colonization and the one stage of occupation, Austria becomes a noncolonizer instead of a colonizer and Belgium a colonizer instead of an occupier (the significance of this will be made clear in the methodology and case study chapters to follow). But Howard’s research is restricted to the European Union, leaving out the settler countries, Japan, and the Western European countries not in the European Union (Norway and Switzerland).

Thus, the theory outlined here focuses on four hypotheses targeting a political-institutional explanation of naturalization and nationality in advanced industrialized countries. First, colonizing countries will have moderate barriers to nationality established by nationality laws and a moderately high rate of naturalization in proportion to their colonization throughout the world. Thus, a colonization measure will moderately and negatively correlate to barriers to nationality and moderately and positively explain naturalization rates. Second, noncolonizing countries, especially former occupiers, will have the highest barriers to nationality and the lowest naturalization rates. Third, settler countries will have the lowest barriers to nationality and the highest naturalization rates. Indigenous population decline in each settler country correlates positively with naturalization rates and negatively with barriers to naturalization. Fourth, Nordic countries will have residual barriers to nationality but moderately high naturalization rates based on cumulative left party power. Figure 1.1 presents a rough diagram of these hypotheses.

A brief preview of evidence can be seen in Table 1.1, where countries are grouped according to nationality regimes. The noncolonizers, with few colonized persons per colonizer in the mother country and with no indigenous population to speak of, are low on naturalization rates averaged from 1970 to 2005. Colonizers have naturalization rates three times higher than the noncolonizer rates, and the settler countries with high rates of indigenous decline have naturalization rates six times higher than noncolonizer rates. Nordic countries are in between the noncolonizers and colonizers; they have three times the noncolonizer rates (they have the most left party power but this will be discussed in

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¹⁴ Israel also fits the permanent settler model, but Israel tends to exclude Muslims who are an indigenous population (Peled 1992, Wilmer 1993). South America also has settler countries but these countries are beyond the scope of this work.

¹⁵ Castles and Miller propose four models: imperial (United Kingdom, United States, Russia, Austria-Hungary), folk (Germany), republican (France, United States), and multicultural (Australia, Canada, Sweden, Netherlands, United States). Kostakopoulou has republican, communitarian, civic registration, and libertarian models. Baldwin and Edwards, and Faist have geographically based regions: Anglo-Saxon, continental, Scandinavian, and Mediterranean. Joppke sees three: postcolonial (United Kingdom, France, Portugal, Spain), diaspora (Germany, Israel), and settler (United States, Australia). Soysal has three incorporation models: liberal (United Kingdom, United States), corporatist (Germany, the Netherlands), and statist (France).
Table 1.1. Naturalization Rates from 1970 to 2005 by Explanatory Factors

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Noncolonizers/Occupiers</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Switzerland</td>
<td>1,794</td>
<td>1,167</td>
<td>0</td>
<td>0</td>
<td>25%</td>
</tr>
<tr>
<td>Ireland*</td>
<td>2,354</td>
<td>955</td>
<td>0</td>
<td>0</td>
<td>3%</td>
</tr>
<tr>
<td>Belgium*</td>
<td>1,664</td>
<td>654</td>
<td>0</td>
<td>0</td>
<td>46%</td>
</tr>
<tr>
<td>Germany*</td>
<td>840</td>
<td>979</td>
<td>0</td>
<td>0</td>
<td>42%</td>
</tr>
<tr>
<td>Italy</td>
<td>577</td>
<td>214</td>
<td>0</td>
<td>0</td>
<td>44%</td>
</tr>
<tr>
<td>Japan</td>
<td>887</td>
<td>293</td>
<td>0</td>
<td>0</td>
<td>40%</td>
</tr>
<tr>
<td>Average</td>
<td>1,352.7</td>
<td>710.3</td>
<td>0</td>
<td>0.0</td>
<td>32.2%</td>
</tr>
<tr>
<td>Colonizers</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Austria</td>
<td>2,984</td>
<td>1,159</td>
<td>1,600</td>
<td>1,600</td>
<td>46%</td>
</tr>
<tr>
<td>France*</td>
<td>3,111</td>
<td>191</td>
<td>743</td>
<td>743</td>
<td>41%</td>
</tr>
<tr>
<td>Netherlands</td>
<td>4,274</td>
<td>493</td>
<td>5,599</td>
<td>5,599</td>
<td>40%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>5,844</td>
<td>395</td>
<td>15,692</td>
<td>15,692</td>
<td>42%</td>
</tr>
<tr>
<td>Average</td>
<td>4,053.3</td>
<td>669.0</td>
<td>5,908.5</td>
<td>5,908.5</td>
<td>41.6%</td>
</tr>
<tr>
<td>Nordic Countries</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sweden</td>
<td>5,406</td>
<td>839</td>
<td>0.1</td>
<td>-3.3%</td>
<td>51%</td>
</tr>
<tr>
<td>Finland</td>
<td>4,254</td>
<td>28</td>
<td>0</td>
<td>-3.3%</td>
<td>47%</td>
</tr>
<tr>
<td>Norway</td>
<td>3,926</td>
<td>567</td>
<td>0</td>
<td>-8.6%</td>
<td>48%</td>
</tr>
<tr>
<td>Denmark</td>
<td>3,867</td>
<td>654</td>
<td>37</td>
<td>-15.9%</td>
<td>46%</td>
</tr>
<tr>
<td>Average</td>
<td>4,338.3</td>
<td>522.0</td>
<td>9.3</td>
<td>-7.7%</td>
<td>47.8%</td>
</tr>
<tr>
<td>Settlers</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Canada*</td>
<td>11,278</td>
<td>653</td>
<td>0</td>
<td>-95.6%</td>
<td>54%</td>
</tr>
<tr>
<td>Australia*</td>
<td>6,730</td>
<td>696</td>
<td>0.0005</td>
<td>-76.5%</td>
<td>48%</td>
</tr>
<tr>
<td>New Zealand*</td>
<td>4,846</td>
<td>839</td>
<td>0</td>
<td>-28.9%</td>
<td>44%</td>
</tr>
<tr>
<td>United States*</td>
<td>5,146</td>
<td>280</td>
<td>14.9</td>
<td>-93.2%</td>
<td>43%</td>
</tr>
<tr>
<td>Average</td>
<td>7,000.0</td>
<td>617.0</td>
<td>3.73</td>
<td>-73.55%</td>
<td>47.1%</td>
</tr>
</tbody>
</table>

Notes:

- The Anglo-Saxon countries and France employ jus soli throughout this period. Belgium and Germany added jus soli in 2000. An adjustment for jus soli births based on total birth rates was added to their naturalization figures. See Chapter 2 for details.
- Ireland and Italian naturalization and immigration figures are from 1980 to 2005. Austria does not collect immigration data like other countries, so their figures in column 2 are from 1975 to 2005. Norwegian naturalization data are from 1977 to 2005.
- The colonization variable consists of persons in the colonies divided by the persons in the colonizing country. For a country to count as a colony, they must have been occupied for more than 50 years. Otherwise, they are an occupied country. See Chapter 2.
- The indigenous decline variable is the maximum indigenous decline that occurred in the country. The dates vary but most of them occur between 1750 and 1900. It is computed by the high point of indigenous decline minus the low point, divided by the high point. See Chapter 2.
- Left party power is measured relative to the other parties in the political system. This means that the Democrats in the United States and Liberals in Canada are considered left.

The next section). Although these hypothesized factors work, average immigration rates are not correlated with naturalization rates (i.e., noncolonizers have high immigration but low nationality rates and vice versa). Thus, each regime type fits these hypotheses.

Explaning the Political Development of Year-to-Year Naturalization Rates

The nationality regime approach is a long-term framework, but the next set of theories focuses more on the last 4 decades and year-to-year changes. First, economic and demographic models see immigration as changing population and economic outcomes (Mohlo 1986, pp. 105-7). For economic pull theories, immigration can fill labor shortages in receiving countries, especially settler countries. Thus, unemployment should decrease and economic growth increase naturalization rates. Outsourcing adds to these unemployment pressures. Demographic forces like baby booms and women entering the labor force can decrease the need for immigration (Janoski 1990), but this can be countered by declining fertility and birth rates as advanced industrialized countries fill employer needs through immigration. Although some of these factors are contradictory, the final result tends to be low unemployment, high growth, and low fertility rates, leading to immigration and naturalization pressures. Though
infrequently stated, the connection to naturalization is that immigrants will naturalize when they land in a low unemployment and high growth country with many opportunities. These theories provide counterarguments to the political sociological theories that follow.

Second, cultural explanations may focus on nation-states concerning their differences in ethnic origin and religion, and international civil society (Soyssal 1994; Hollifield 2000; Bauböck 1994). Immigrants with a rural lifestyle and religion (Muslim or Catholic) may experience conflict when entering urban areas in Protestant or secular countries. Some countries may want to avoid these conflicts and erect naturalization barriers. Cultural theorists may also develop themes from the noncolonizer’s culture concerning the impact of resentment and losing world wars. Cultural factors that may decrease naturalization rates are Hofstede’s “risk avoidance” (2003), Esping-Andersen’s “traditional welfare regimes” (1990), and lack of a universalistic ideology consisting of an official state religion and cumulative leftist party power (e.g., Scandinavia).

Sometimes cultural theories lead to convergence theory. Liberal state theories emphasize economic forces and chain migration networks that sustain culture through international migration. Hollifield (2000) and Joppke (2005) say liberal political and legal factors in civil society are central to the theory that citizenship rights are increasingly enacted for citizens and proposed for immigrants and refugees. International institutions pressure the state to enact these rights. Thus, if economic downturns are avoided, immigrant rights will increase and naturalization policies will open up because of international pressures. This process has a globalization component; transnational corporations further promote international movements and indirectly promote international civil society. And Bauböck (1994) presents a convergence approach with more emphasis on political theory.

Convergence through globalization and internationalization is easy to state but difficult to prove. State policies vary considerably as some states ignore international civil society or bend it to their will, and other states comply with liberal policies because of internal forces already in favor of them. So in many ways, international civil society is more of a resource for proimmigration actors than a constraint on each country. Often these convergence theories do not identify the interest groups and enactors of these policies within each state. Hollifield passively refers to political parties when he says that the “demands for greater immigration control or changes in nationality or citizenship laws will be channeled through political parties and party systems” (2000, p. 170).

European Union integration should not be conflated with a general convergence theory. Although there is a push to make policies consistent, the European Union treads lightly in this area. The Council of Europe may actually have more effect as a moral leader, but it has a much larger number of European countries in its organization and none of the settler countries. Joppke sees many settler countries reacting to globalization and opening themselves up to Asia (2005). However, a more focused approach would ask why some parties react to globalization and human rights and other parties do not. As a result, liberal state theory sees political parties reacting to external forces rather than to internal citizenship rights claims.

Third, two contrasting political theories focus more clearly on parties and groups demanding change: Freeman’s capture theory based on “clientele politics” and rational choice (not to be confused with his earlier political economy theory), and Huber and Stephens’ combination of status group and class conflict in a power resource theory. Freeman uses a two-by-two classification of costs (concentrated or diffuse) and benefits (also concentrated or diffuse) to emphasize one particular cell — clientelism.17 Employers and immigrant interest groups gain concentrated benefits while the general population absorbs the diffuse costs of immigration. As a result, immigration is not very salient for the country at large (i.e., most people have little or no interest in immigration), and political parties are split on the issue (Freeman 2006, p. 230; Janoski and Wang 2005, p. 637). Freeman (1998, 2006) and Money (1999) have developed this in a comparative context. The major tenet of clientelism or capture theory is that political parties are not important because the right is divided between free market employers and traditional nationalists, and the left is split between universalistic cosmopolitans and protectionist labor. In the context of nationality politics, this hypothesis is Left and right political party power have no effect on naturalization rates as employer and immigrant groups split political parties and capture immigration politics. While this theory provides insight into internal party conflicts, it ignores the explosion of immigration politics that has taken place between political parties over the last two decades (Tichenor 2002).

A second political approach recognizes the role left political parties play in international civil society and year-to-year economic and demographic changes. This began with the United Nations creating the U.N. Educational, Scientific, and Cultural Organization (UNESCO) to push for racial equality and equal treatment and the U.N. High Commissioner on Refugees (UNHCR), persuading states to accept more refugees (Loescher 2001; Soyssal 1994). The international liberal norms. Finally, the theoretical introduction in its discussion of domestic forces mentions “pressures” but not political parties (p. 28). A theory focused on the significance of left party power would need to do more than briefly mention a tendency in the last chapter of his book.

16 Some claim that Joppke makes a theoretical case for left party power causing immigration or nationality outcomes. Joppke says: “the political left tends to support the integration of domestic immigrants...while the political right carries the torch of enigmatic communities abroad” (2005, p. 442). He further states, “Grosso modo, the political left has pushed toward de-ethnicization” (i.e., naturalization and liberal immigration policy) (2003, p. 456). However, his convergence theory of international liberalism clearly overshadows this view of political parties. His explanation of the United States briefly mentions the Democratic Party (2003, p. 56) and the Labor Party in Australia (p. 65), and he clearly focuses on foreign policy and

17 The other cells are interest group (parties matter), majoritarian (costs and benefits are diffuse for all), and entrepreneurial politics (costs are concentrated but benefits are diffuse).
The Ironies of Citizenship

institutionalization of open asylum policies through U.N. human rights declarations, UNESCO, the UNHCR, the Council of Europe, and voluntary associations (e.g., Amnesty International, Human Rights Watch, Doctors without Borders, Witnesses for Peace) did not force nations to take action, but they provided strong resources for indigenous minority groups and left parties to protest racist regimes. Countries became more sensitive to refugees as institutionalized asylum combined with expanding world trade through globalization (Loescher 1993, 2001). This asylum regime led to refugees and asylum seekers being seen by some as vulnerable immigrants entitled to special care, and it politicized immigration policy.18

As a result, political party differences over the last 30 years have become more important. Often coupled with civil rights promotion, left and green parties, sometimes in red-green coalitions, led the charge for greater immigration and naturalization. Christian democratic and conservative parties in blue-black coalitions largely opposed generous approaches because immigration and asylum increased welfare costs and threatened traditional culture. The right also saw migrants as potential left party and union members. Anti-immigrant parties pushing restrictive and sometimes racist issues emerged from the far right, and the more moderate right would have to appease them in order to protect their political base (Gish 2010). Despite employer needs for labor, the right’s antipathy to migration and citizenship rights increased for cultural and economic reasons. Two types of migrants were important: (1) illegal immigrants, who were seen as violating laws and imposing medical and educational costs on the government, and (2) legal refugees who by law could not work and needed welfare benefits to survive until their asylum status was judicially confirmed or denied (Gimpel and Edwards 1999).

Under globalization and international civil society, left parties and unions have come to support immigration and open naturalization policies. Before World War II, left parties opposed migration because it decreases the power of labor by increasing the supply of workers (Briggs 2001; Collomp 1999). After World War II a new approach focused on organizing immigrants and naturalizing those within the country (Haus 2002; Watts 2003; Buchanan and Nicholls 2003). Although labor unions and parties might periodically embrace protectionism, unions have increasingly supported the rights of immigrants in the country to become citizens. German and Swedish Social Democrats, often led by the green parties, have opened up on these issues, and naturalization has increased. So rather than being split between party elites and labor, social democratic and green parties have tried to protect immigrants, encourage naturalization, and pursue a multicultural approach to society. Focusing

on racialized right party power and anti-immigrant public opinion presents the negative mirror image of left party power (Howard 2009, pp. 59–62), but my approach chooses to focus on the positive actors promoting naturalization.19 Thus, left and green parties have strongly supported more open naturalization policies, and liberal and center parties sometimes join in this coalition. A second hypothesis is Increases left party power in the post-World War II period (but not before) will lead to more open nationality policies and higher naturalization rates.20

This class and status approach fits “power constellation theory,” which emphasizes left and green power with a complex gender component, coupled with the rise of status group protests, demonstrations, and lobbying (Huber and Stephens 2001). Higher economic growth and female labor force participation lead to lower birth rates, leading to greater immigration but not necessarily naturalization. Higher female labor force participation leads many women toward left parties to protect their hard won gains in the labor market and protective policies benefiting their families (i.e., anti-harassment policies and family allowances). Although the left party power base in manufacturing unions has weakened, increased labor force participation and women’s political power have picked up the slack. An increasing gender gap in most countries centers around women’s vulnerabilities to the market and their concern for people. Caring values are also seen in greater concern for refugees, who are often widows and children (Beaulieu and Kehrberg 2007; Elshlaim 1987, pp. 235–6; Hobson 2005; Lister 2002; Ramirez, Soysal, and Shanahan 1997). Although women are always concerned about their own families, they also support other women under extreme duress. Thus, a left party power corollary is that The increasing labor force participation and greater representation of women in parliament leads to political power within left (red-green) parties that promotes social welfare support for refugees and immigrants, and makes the granting of naturalization much easier. This overall theory stressing left party power can be seen in Figure 1.2, which also shows that left party power

18 A world policy approach might measure the extent of treaty ratifications and memberships in international organizations. One problem with this is the United States is low on treaty ratifications but high on naturalization. Also, international organizational memberships show little variation between equally developed countries (e.g., Japan and Germany are low naturalizers but have very high international memberships).

19 Howard (2009) also focuses on the long-term impact of early democratization, but this argument is questionable for a number of reasons. First, there is a 75% overlap with the colonization argument (Belgium, France, the United Kingdom but not the Netherlands) and nearly 90% overlap with the late democratizing noncolonizers (i.e., not Greece), which implies multicollinearity problems. Second, early democratization in Belgium and late democratization in the Netherlands does not fit the facts that the Netherlands has a much higher naturalization rate than Belgium. Third, the lack of early democratization does not accord with the high naturalization rates in the Nordic countries, all of whom were late democratizers in this approach. However, one should keep in mind that Howard’s main causal explanation focuses on laws and not rates.

20 In the United States, this led to the Republican revolt against immigration with Proposition 187 in California, followed by less drastic but nevertheless effective federal legislation (Gimpel and Edwards 1999). In Europe, it often led to the rising power of anti-immigrant parties. Thus, the increasing flow of illegal immigrants and refugees causes political polarization.

21 However, women have headed important anti-immigrant groups — Pia Kaersgaard in Denmark, Siv Jensen in Norway, and Pauline Hanson in Australia.
Political Variables with 2-year lags:
a. Left and green party power
b. Female parliamentary power

Demographic variables with 2-year lags:
a. Immigration rate
b. Net migration rate
c. Asylum rate

Economic variables with 2-year lags:
a. Unemployment rate
b. GNP per capita at purchasing power parity

Barrier to Nationality Index with 1-year lag
Naturalization Rates:
Year-to-year rates from 1970 to 2005

Figure 1.2. Theoretical Model Explaining Naturalization Rates, 1970 to 2005.

power will have an independent effect on naturalization rates, even controlling for the barrier index.

Minor Keys – Fluctuations within Regimes

A third political theory is cumulative but reactive in each regime type. Countries tend to reverse nationality policies to some degree because of their long-term effects. The first partial reversal concerns colonial powers who have moved into their postcolonial stage. As their empire receded, colonizers prompted by conservative political parties reduced immigration and citizenship from their former colonies. This minor key or cyclical hypothesis is Postcolonial empires will attempt to close off naturalization processes to limit the impact of foreigners in their country. The path-dependent processes developed during empire will slowly evolve into more restrictions on naturalization but within the general range of their regime model.

Second, closed noncolonizers with strong folk traditions open their nationality policies, sometimes with restrictions on immigration and asylum. These new citizens will form interest groups to support and further open processes. For instance, Germany and Belgium with differing political contingencies – the fall of communism and political unification of Germany, and gaining the de

facto capital of the European Union in Brussels – have opened their naturalization laws. Thus, noncolonizing countries with the help of left-party and green party power develop a surprising amount of openness to naturalization, but within their regime limits (i.e., they do not reach colonizer or settler levels).

Third, settler countries change from their exclusion of Asian (especially Chinese) and African immigrants to nonracist regimes. Canada led the move to erasing this racism, followed by the United States. Each of these countries increased the rights of indigenous peoples with Canada and New Zealand leading and Australia and the United States trailing. The abandonment of “white only” immigration and naturalization hypothesis is Depending on their position in the world system and the strength of their internal left parties, settler countries increasingly drop their racist immigration and naturalization policies to become much more open toward third-world immigrants and indigenous peoples.

Cumulative institutionalization uses a number of different elements of culture including ideas, norms, and even narratives. These aspects of culture surround, bolster, and persuade citizens, aliens, and politicians about the legitimacy of a selected political-institutional strategy motivating nationality policy and law. Over time, political-institutional strategies change and cumulative institutionalization continues on its old course, sometimes taking a decade or more to adjust. But in the long run institutions adjust to new political and economic realities, as they did in the United Kingdom. This shows that the variation of institutions and their ideas and values make a political-institutional approach complex and politicians have some choice among policy ideas.

Thus, a theory of fluctuating reversals demonstrates countries opening and closing nationality policies within the limits of their regime types. Countries that had been open start to restrict immigration and require greater assimilation; countries that had been closed open up their naturalization policies to levels deemed impossible just a few years before. But the naturalization rates in both regime types turn back to their original range. Openness heralds the rise of multiculturalism and a return toward assimilation (Brubaker 2004, pp. 116–31), but an added stimulus comes with the effects of terrorism after the tragedy of 9/11. In the noncolonizer countries, their newly opened naturalization rates stabilize before they approach the more open levels. Thus, these openings and closings do not overcome basic regime types because they are still embedded within their original institutional constraints.

Conclusion

Naturalization rates are not the simple result of immigration but rather a complex political process with their own causes stemming from long-term nationality regime types and left and green political power. This book demonstrates these assertions through comparative/historical case studies and a combined pooled analysis of all eighteen countries over as many years as possible since 1970.
2

Wide Measures with Dynamic and Synthetic Methods

This chapter explores six issues concerning measurement and methods for analyzing naturalization rates. The first and most important issue focuses on an innovative approach to naturalization rates. This book explains naturalization rates as a more comprehensive and important measure than typical, narrow approaches to naturalization rates. This is because naturalization is a part of nationality laws that most countries pass; however, a more important part of these same laws concerns the birth of children to foreign parents on national soil. Are these children citizens or not? If they are citizens, then *jus soli* principles apply. If they are not citizens, *jus sanguinis* is in effect. Two positions—one too narrow and another too broad—focus on whether this “creation of citizens” should be part of a study of naturalization. Some say the inclusion of *jus soli* births violates the concept of naturalization; however, *jus soli* principles and naturalization clearly appear in the same laws and are part of a more unified concept of naturalization. Others say that including *jus soli* births underestimates the impact of *jus soli* births. This is because the *jus soli* child grows up to have children who are also citizens, whereas the *jus sanguinis* child remains a foreigner, and his or her children have a harder time obtaining citizenship. This broad position requires hazardous projections of future births. Consequently, on the crucial issue of defining the main dependent variable, this book avoids the narrow position of excluding *jus soli* births and the wide position of including all subsequent births to the citizen born to foreign parents on national soil. Thus, the focus is on those who would be citizens in some countries but foreigners in others. Although some analysts find this method a violation of previous measures of naturalization rates, one might ask why nationality laws contain *jus soli* provisions and why studies of naturalization include *jus soli* as an explanatory variable. If *jus soli* laws are part of the explanation, then which aspects of naturalization rates are these laws explaining? Clearly, a comprehensive approach to citizenship needs to include *jus soli* births in the naturalization rate.