LIMITS OF CITIZENSHIP
MIGRANTS AND POSTNATIONAL MEMBERSHIP IN EUROPE

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This book is about the changing institution and meaning of citizenship in contemporary nation-states. A new and more universal concept of citizenship has unfolded in the postwar era, one whose organizing and legitimating principles are based on universal personhood rather than national belonging. To an increasing extent, rights and privileges once reserved for citizens of a nation are codified and expanded as personal rights, undermining the national order of citizenship. The case of guestworkers, whose membership in European host polities contradicts predominant conceptions of citizenship and the nation-state, manifests these changes.

In the postwar era, all of the major industrialized countries
of Europe recruited foreign workers to meet their immediate demands for labor. Assuming a sovereign nation-state with a unified citizenry, European governments saw the employment of guestworkers as a temporary expedient, and expected those individuals to remain outside the cohesive bounds of the national polity. The official position was that foreign workers could be sent home at will, upon the decline of their productivity or when unemployment rose. However, the guestworker experience has defied these original expectations and plans. Despite increasing unemployment and formal policies of repatriation, the host states have not succeeded in sending their guestworkers away. Guestworkers are now permanent, and form large, “foreign” communities within the host societies. More strikingly, guestworkers without formal citizenship status have been incorporated into various aspects of the social and institutional order of their host countries. They participate in the educational system, welfare schemes, and labor markets. They join trade unions, take part in politics through collective bargaining and associational activity, and sometimes vote in local elections. They exercise rights and duties with respect to the host polity and the state. Guestworkers are thus empirical anomalies with regard to predominant narratives of citizenship.

The participation of guestworkers in the host polity as social, political, and economic actors with a wide range of rights and privileges contests the foundational logic of national citizenship. Citizenship defines bounded populations, with a specific set of rights and duties, excluding “others” on the grounds of nationality. Yet guestworkers, who are formally and empirically constituted as aliens within the national collectivity, are nonetheless granted rights and protection by, and thus membership in, a state that is not “their own.”

How can we account for the apparent anomaly of guestworker membership? Why have European states extended the rights and privileges of their citizens to migrant workers? What legitimizes the host states’ responsibility for foreigners living within their borders? What does the guestworker experience mean for accounts of citizenship facilitated by a nation-state model?

My inquiry into these questions challenges the predominant assumption, both scholarly and popular, that national citizenship is imperative to membership in a polity. As I show in the case of postwar migrants in Europe, incorporation into a system of membership rights does not inevitably require incorporation into the national collectivity. The guestworker experience attests to a shift in global discourse and models of citizenship across two phases of immigration in the twentieth century. The model of national citizenship, anchored in territorialized notions of cultural belonging, was dominant during the period of massive migration at the turn of the century, when immigrants were expected to be molded into national citizens. The recent guestworker experience reflects a time when national citizenship is losing ground to a more universal model of membership, anchored in deterritorialized notions of persons’ rights.

This new model, which I call postnational, reflects a different logic and praxis: what were previously defined as national rights become entitlements legitimized on the basis of personhood. The normative framework for, and legitimacy of, this model derive from transnational discourse and structures celebrating human rights as a world-level organizing principle. Postnational citizenship confers upon every person the right and duty of participation in the authority structures and public life of a polity, regardless of their historical or cultural ties to that community. A Turkish guestworker need not have a “primordial” attachment to Berlin (or to Germany, for that matter) to participate in Berlin’s public institutions and make claims on its authority structures. It is such postnational dictums that undermine the categorical restraints of national citizenship and warrant the incorporation of postwar migrants into host polities.

In this book, by means of a comparative study of the incorporation and membership of guestworkers, I pursue a dual analytical agenda. First, I examine in detail the incorporation regimes—that is, patterns of discourse and policy—of major western European countries, and provide a conceptual framework to explain the differences in incorporation. I show how European host countries, each with an elaborate state system
designed to manage the membership of its domestic population, have expanded these systems to incorporate foreign residents. Second, I relate the contemporary reconfiguration of membership in European nation-states to changes in world-level models and discourses that contest and complicate the national order of citizenship. For this agenda, guestworkers reflect the existing logic of membership in particular polities and the wider changes in the institution of national citizenship.

**Variation in Incorporation Regimes**

While global discourses and models increasingly penetrate national frameworks, spurring the incorporation of guestworkers, polity-specific modes of membership still shape the patterns that incorporation takes in specific European countries. Host polities, drawing upon their institutionalized resources and understandings of membership, develop distinct strategies, policy instruments, and organizational arrangements to incorporate migrants. Take, for instance, the contrast between Sweden and Britain.

In Sweden, where individuals characteristically participate in various aspects of public life through legally recognized corporate groups, the incorporation of migrants involves collective interchange and centralized organizational activity. State policies produce "official ethnicities" and arrange for their highly formalized, structured participation in the Swedish polity. Like the members of other corporate groups, migrants are represented by their own associations, in this case defined by national origin or culture, through appropriate administrative and consultative structures. Furthermore, in Sweden, incorporation emphasizes policy instruments that target the welfare and social rights of specific migrant groups. Thus, it is only through their official corporate identity and standing that migrants gain access to rights and public services.

In Britain, on the other hand, membership in the polity is organized around the individual. In this context, the civil rights and labor-market participation of individual migrants become the most visible instruments of incorporation. Anti-discriminatory legislation concerning housing and jobs constitutes the cornerstone of state policy, which aims to enhance the opportunity patterns of migrants. Incorporation assumes much more society-level participation and differentiated organizational activity. Whereas in Sweden professionally and nationally organized elites act as intermediaries between the state and migrant groups, in Britain, the initiatives that address migrant issues are local and voluntary.

Thus, variations in modes of incorporation among states do affect migrants' strategies and participation in host societies. In Sweden, religious demands of migrant groups are accommodated through formalized consulting between the central state and migrant associations. To secure provision for religious education classes, religiously appropriate school meals, or celebration of religious festivals, Muslim organizations appeal to the Swedish Association of Free Churches, which represents them to the state bureaucracy. In Britain, for such causes, migrant associations actively engage in local politics. They canvas city councils, school boards, and local deputies to make their demands known and generate change.

When systematically scrutinized, cross-national differences reveal how host states and their foreigners encounter each other. In accounting for variations in incorporation, I make a comparative argument about the effects of polity-specific membership models in the field of immigrant policy. In other words, I assert that patterns of incorporation can be associated empirically with the institutionalized modes and the organizing logic of membership in particular polities.

In doing so, I intend to reverse one of the driving presuppositions of immigration literature: the notion that guestworkers' situations and cultures predict how they participate in and interact with host societies. Most of the literature attributes a weighted causality to migrants' own conditions—customs, traditions, ethnoreligious background, and so on. In contrast, I privilege the institutional repertoire of host political systems, which afford the model and rationale for both state and migrant action.

In the chapters that follow, I examine the incorporation of migrants in European host polities through a study of political models and discourses of membership at both the nation-state
and world level. As these models and discourses become increasingly intertwined, the global modalities of rights reverberate through nation-state-level arrangements and premises of citizenship. Together, they constitute the topography of membership in contemporary polities.

Global Paradoxes of Membership

In the postwar era, if one facet of the discourse and praxis of immigration is the closure of national polity, the other is the expansion of the same polity beyond national closure. While the first involves boundary construction through restrictive policy measures and national(ist) narratives, the other is about “border crossings” (Rosaldo 1989)—a constant flux of people, the extension of rights of membership to foreigners, and narratives of multiplicity. This apparent paradox is only intelligible if world-level institutional frameworks and processes are taken into consideration. By omitting the global element and focusing on the nation-state as the unit of analysis, much of political sociology axiomatically privileges the nationally bounded model of citizenship and bypasses the reconfiguration of contemporary membership. To redress this overemphasis of the national unit, I accentuate the ways in which the global system shapes schemes of incorporation, parameters of membership, and boundaries of polity in the postwar era.

My discussion of the global system takes the symbolic and institutional order as constitutional. Thus, I consider modes of discourse to be as consequential as organizational mechanisms in facilitating new understandings of citizenship. Discursive modes afford “taken-for-granted rationales” for, and “common social accounts” of patterned state action and practice—in other words, a cultural framework upon which the national actors base their meanings and actions (Meyer, Boli, and Thomas 1987; DiMaggio and Powell 1991; Jepperson 1991). Accordingly, I stress the institutionalized rules and definitions of the global system that provide models for and constraints on actions and policies of the nation-states in regard to international migration and migrants.

There is no unified, homogeneous global institutional order.

Instead, there is a multiplicity of discourses and modalities of legitimate action. Combined in complex ways, these discourses and modalities sanction different forms of activity and organizing. Hence, the global system enacts multiple institutionalized scripts, which, although equally legitimated, do not always operate in agreement and may lead to “conflicting claims and empowerments.” Consequently, multiply coexisting institutions and discourses may further inconsistent outcomes; but this does not mean that they necessarily create irresolvable tensions or “role conflicts” for actors. State actions, policies, and identities may reflect multiple sets of norms and institutions, equally and/or concomitantly acted upon.

Consider two institutionalized principles of the global system in regard to immigration: national sovereignty and universal human rights. Celebrated and codified in international conventions and treaties, these principles form pivotal components of postwar international migration regimes. The principle of national sovereignty ordains that every “nation” has a right to its own territorially delimited state, and that only those who belong to the nation have the right to participate as citizens of the state. Over the course of the twentieth century, this articulation of national/territorial sovereignty has been consolidated as “the ‘natural’ political condition of humankind” (Giddens 1985:259). As a corollary to this, territorial belonging (and identity) is presumed to be determined by the parameters of national contiguity and homogeneity.

Equally emphasized in the global framework is the human rights principle, advocated and practiced by national and transnational actors. The notion of human rights, as a codification of abstract concepts of personhood, has become a pervasive element of world culture. Continual invocation of human rights establishes and advances universal contingencies and thus legitimates claims for rights and identities of “persons,” from within or without national limits.

These two [global] precepts simultaneously constrain and enhance the nation-state’s scope of action. On the one hand, nation-states are charged with expanding “responsibilities,” on the basis of human rights, with respect to the foreign populations living within their borders. On the other hand, they are
expected to regulate immigration and exercise border controls as a fundamental expression of their sovereignty. Indeed, it is precisely these institutionalized reifications of national sovereignty and human rights that occasion both the status of guest-worker (with its implication of temporariness) and the expanded rights and duties guestworkers accrue in their host polities (their de facto membership). European states grant rights to their foreign residents, admit and provide for family members of foreign workers, extend their obligations—financial or other—to countries of origin even when asylum seekers are sent back, yet also reinforce their borders through continued attempts to restrict immigration and enact discourses of the past through nationalist narratives. In so doing, they "[act] against the background of, and thereby reproduce[e]" (Wendt 1992:413) the prevailing principles and definitions embedded in the global system.

The concurrent invocation, in nation-states' rhetoric and praxis, of national sovereignty and universal human rights engenders paradoxical correlations. This means, for one thing, an incongruity between the normative and organizational bases of rights. While the source and legitimacy of rights is increasingly located in the transnational order, individual rights continue to be organized differentially, country by country, and bear the imprint of polity-specific forms of membership and incorporation. A similar disparity appears between two constitutive aspects of citizenship—identity and rights. Whereas rights, and claims to rights, become universalized and abstract, identity is still conceived of as particular and bounded by national, ethnic, regional, or other characteristics.

These apparent contradictions precipitate around the constructs of the bounded, territorialized nation-state and universal, deterritorialized rights, creating a dialectical tension. Nation-states and their boundaries persist as reasserted by regulative immigration practices and expressive national identities, while, at the same time, the universalistic rights of personhood transcend these boundaries, giving rise to new models and understandings of membership. Consequently, a more universalistic model of membership and rights comes to contest the exclusive model of citizenship anchored in national sovereignty.

Research Strategy and Organization

This book is based on a detailed, comparative study of state incorporation patterns and changes in the membership of guest-workers over time. The study encompasses the major European countries with prominent populations of migrants, both economic and political, concentrating particularly on the postwar period. Western Europe, which has moved furthest in blurring the national boundaries around economic, cultural, and political units, provides a distinctively prolific site for investigating the changes in the institution of citizenship.

Postwar international migration is characterized by a multiplicity of forms: labor migration, political migration, postcolonial migration, and migration within common markets. These migratory flows, in turn, have produced a host of immigrant strata: legal temporary or permanent migrants, political refugees, illegal migrants, ex-colonial citizens, and common-market citizens. While the rules governing their entry, residence, and employment differ, the common characteristic of these populations is their noncitizen status. Though, strictly speaking, the term guestworker does not represent all of these forms and strata, I employ it as a general category in reference to noncitizen migrant populations.

The first component of my analytical agenda concerns cross-national patterns of incorporation. For comparison, I confine my case countries to the Federal Republic of Germany (Germany, hereafter), France, the Netherlands, Sweden, Switzerland, and the United Kingdom. Affected and motivated by similar labor-market conditions and long- and short-run economic trends, all of these advanced industrialized countries imported foreign labor after World War II, either through explicit state programs or through migration of a more spontaneous nature. They also have accepted a large number of political refugees. Except for France and, to a certain extent, the United Kingdom, none of these countries have been immigration countries in the traditional sense: that is, migrants were not considered as permanent inhabitants and prospective citizens upon their arrival. Despite their shared experience, these European host states have generated different policies and organizational structures in incorporating migrants. Having
controlled for socioeconomic factors by the choice of case countries enables me to draw cross-national comparisons that focus explicitly on the effects of polity-specific institutional resources and forms of membership.

My analysis systematically identifies and orders varying dimensions of incorporation with respect to distinct membership models. I examine how polity-specific forms of membership shape and maintain state discourses, policies, programs, and budgets that concern migrant populations, as well as the organizational activity and participation of the migrants themselves. I also investigate the extent of the rights and privileges granted to foreigners in host polities. For this purpose, I add Austria, Belgium, Canada, Denmark, and the United States to the original six countries.

Then, I extrapolate from the emerging forms of incorporation and membership of migrants to draw inferences about how global factors transform the national order of citizenship. I elaborate on the extent to which the concepts of universalistic rights and personhood are ingrained in the global institutional order and its discourse, and provide substantiating instances of their influence on state action and policy, and on migrants’ claims to rights.

My concern in this study is the organization and articulation of incorporation policy and membership rights, not their implementation and practice. The realization of policies and rights invariably involves a discrepancy in implementation, which, in the case of guestworkers, correlates with persistent social and economic inequalities. Clearly, the degree to which policies are implemented and rights are exercised has relevance to how migrants experience their membership in host polities. However, since my main interest in this project is to capture the wider changes in the institution of citizenship itself, my analysis is not designed to address the consequences of implementation.

Data for this project were collected mainly through on-site interviews and archival and documentary research in the countries involved. From spring of 1988 through fall of 1991, I made prolonged visits to these countries, including a stay of over a year in Berlin. I conducted extensive interviews with officials from relevant ministries, municipalities, and other administrative agencies; with representatives of pertinent welfare organizations, trade unions, and the specialized agencies that cater to migrants; and also with the leaders of migrant associations. As for migrant associations, I concentrated on those of migrants from Turkey, who constitute the largest foreign population in Europe. Aside from interviews, I participated in migrants’ associational and cultural activities. These engagements afforded me valuable insight into migrants’ interactions with host polity institutions.

I also interviewed qualified informants on international migration, such as scholars from various European research institutions, members of national research councils and governmental advisory boards, and officials of international organizations. The relatively small size and interconnectedness of the countries of Europe, and the tight networks among scholars, researchers, and officials facilitated my access to crucial resources and contacts. (See appendix A for a list of the offices, agencies, and organizations at which the interviews were conducted.) The interviews provided a comprehensive body of information on the formal structures and arrangements of particular countries, as well as an understanding of the prevalent discourses. I conducted the interviews open-endedly but used a structured questionnaire to ensure their comprehensiveness.

Further systematic data on state policies, regulations, and budgets were compiled from relevant governmental documents and other written sources: statistical reports, research and policy papers, and annual reports. I also made extensive use of the documents, reports, and brochures put out by migrant organizations. Additional data were obtained from the publications of the International Labor Organization (ILO), the European Community (EC), and the Organization of Economic Cooperation and Development (OECD).

The next chapter is a brief account of the history of international migration and its interaction with the construction of the nation-state system and national citizenry in Europe. I discuss the characteristics of contemporary migration systems, emphasizing discrepancies between the assumed models and the demographics of postwar migrant populations.
CHAPTER ONE

Chapter 3 lays out the main premises and guiding ideas of this inquiry. I argue that the incorporation of postwar migrants is shaped by two factors: the institutionalized modes and organization of membership in particular polities, and larger changes in the institutional and discursive order of rights at the global level. I introduce a typology of membership models—corporatist, liberal, and statist—as a framework for understanding and analyzing incorporation. Chapters 4 and 5 use these models to identify and explain the different incorporation patterns that have emerged in European host countries.

Chapter 6 discusses the implications of different patterns of incorporation for the collective organization and participation of migrants, focusing on the ways they respond to the new institutional environments encountered in the host societies. I argue that the models of membership and organization available in each polity, rather than the cultural particularities of migrant groups, predict the collective forms and patterns of migrant organization.

Chapters 7 and 8 address the question of the changing institution and meaning of citizenship in the contemporary nation-state system. Chapter 7 reviews the membership status of guestworkers, concluding that they are incorporated into many of the rights and privileges that constitute the basis of citizenship. Chapter 8 argues that national citizenship is no longer the main determinant of individual rights and privileges, and that these rights are now codified in a different scheme, one that emphasizes universal personhood rather than nationality. I then delineate the emerging model of membership that I call postnational. Finally, I consider the implications of the postnational model for the duality of the persistence of the nation-states and the advent of a new citizenship.

CHAPTER TWO

International Migration and the Nation-State System

Large migratory flows and the use of foreign labor are not new. There have always been population movements (voluntary, planned, or forced) across territorial boundaries. Prior to guestworker programs, other forms of foreign or recruited labor were common; the slavery and indenture systems in the Americas, for example, are well-known passages in the history of world labor movements (Sassen-Koob 1980). In Europe, neither the presence of large numbers of aliens nor widespread foreign labor, often portrayed as unique to the postwar period, is a novel development. Early European literature on immigration shows that by the end of the nineteenth century there were already significant numbers of Irish workers in
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Britain, Spaniards in France, Italians in Switzerland, and Poles in Germany, popular images of whom were not greatly different from those of postwar guestworkers (Rhoades 1978). What distinguishes postwar migration from previous waves is not its magnitude, although even a glance at the numbers shows that the proportion of foreigners living in countries other than their own has increased significantly throughout the world, but, rather, the definition of the relationship between the “other,” or “alien,” and the host polity. This relationship has changed over time as the nation-state has emerged and crystallized, and as it has been transformed and restructured.

International Migrations and the Advent of the Nation-State

A chief characteristic of the contemporary world system is that economic production and trade increasingly take place on a transnational level, while populations are still bound within nation-states by the instruments of citizenship and sovereignty (Wallerstein 1974; Zolberg 1981). This discrepancy has created inconsistencies between capital investment and labor force allocation that have resulted in the movement of both these resources (Sassen 1988). Within the modern nation-state system, it has been relatively easy to move capital around, whereas the free movement of populations has been problematic. Nation-states with well-defined boundaries and sovereignty rules present obstacles to labor migration.

A historical reading of international labor migration reveals that it has been closely tied to the unfolding of the European nation-state system and the development of the institution of citizenship. The concept and category of international migrant is a product of the nation-state system and its ideologies of national membership. The creation of a specialized terminology—with, for instance, a distinction between emigrants (people who go beyond national frontiers) and immigrants (people who cross frontiers from the exterior)—manifests the strict definition of national boundaries and sovereignties (Rocha-Trindade 1988). It is no coincidence that the first statistics on international migration were collected after the Napoleonic wars (Taft and Robbins 1955), a period characterized by the intense efforts of the French state to construct a national polity.

The following is a schematic history of the emergence of nationally codified polities and thus of international migration. Before settling down in agricultural societies, human beings were generally “on the move”; all continents experienced a succession of migratory waves (McNeill 1987; Tait and Robbins 1955). Labor control first became an instrument of societal organization in agrarian systems. Slavery in ancient city-states and then feudalism, in various forms and on various continents, introduced societal and legal arrangements that hindered the free movement of labor. Feudal societies were characterized by individuals who were “fixed” to their localities through primordial or quasi-legal ties—local and communal attachments, personal allegiances to manor and estates, and serfdom.

Although immobility, or perceived immobility, was a reality for the bulk of the population, feudal societies experienced mobility of other kinds. First of all, invasions and conquests, which resulted either in compulsory movements of local populations or resettlements, were still very much a part of European history until the fourteenth century (Davis 1974; Smith 1986). Second, certain categories of people, especially the higher strata, were not bound to the land by the rules of serfdom but were free to move. Artists, artisans, and scholars, regardless of their regional origins, were invited by kings and courts to exercise their skills. Ecclesiastics also enjoyed a great deal of mobility: clergy and members of religious orders could move from kingdom to kingdom, monastery to monastery, to spread their teachings. Christianity and Islam were, after all, translocal institutions, embracing many cultures and peoples. Mercenary armies, composed largely of foreigners, were an important part of European militaries into the nineteenth century, until the ascendance of national mass conscription and prohibitions on foreign enlistment (Thomson 1990; Tilly 1990). Many people moved to other states to sell their military and paramilitary services. Finally, trade and transactions among geopolitically distant lands contributed much to the mobility of a merchant class dating back as early as the 1200s (Abu-Lughod 1989a).

This picture began to change in the fifteenth century with the breakdown of the feudal organization of society. Existing
sources of authority were supplanted by the state as the sole sovereign power. As a result of this shift in authority, individuals were freed from their primordial ties and a direct link between the state and the individual was established, undermining the importance of other bonds in the society. With the rise of absolute monarchies in the seventeenth and eighteenth centuries, the king became “less an overlord of a feudal nobility and more the supreme ruler of the nation” (Bendix 1977:56; see also Anderson 1979). A related development, from the late eighteenth century on, was the redefinition of the populace, from subjects of monarchs to citizens of states, and an emerging overlap between the state and the nation as the principal definer of citizenship. This involved a concerted effort on the part of the state to mold individuals into citizens and to match state boundaries with nationalities, and resulted in fierce wars among and within states.

All these developments had a twofold impact on international migration. On the one hand, the abolition of serfdom and the disintegration of earlier forms of societal organization created an immense mobility, particularly among the lower strata, which had previously been tied to the land. Individuals dislodged from their customary settings adopted new identities and moved to new locales, from rural areas to urban sites. An ease of transportation, the result of new technological developments, also contributed to the increasing mobility of individuals. The “European discoveries” of other lands spurred overseas migration, disturbing the existing migratory patterns within Europe (McNeill 1979). Migration transcended the limits of Europe, reaching across the Atlantic, where the state as an organizing rule had not yet developed. The surge of Europeans brought many settlers to the Americas—missionaries, soldiers, mercenaries, and religious dissenters, along with economic refugees—at the violent expense of natives. This pattern of migration was accompanied by the first colonial ideologies of the European states, which lead to the reinvention of forced labor, through the systems of indenture and slavery.

On the other hand, as nation-states solidified and the international state system crystallized, new restrictions on the mobility of populations were introduced. European states, while freeing individuals from the traditional sources of authority and according them rights and privileges, at the same time created boundaries around their populations. With the French Revolution, the nation-state emerged as the form of political organization and nationality as the condition of membership in a polity. The Revolution codified individual rights and freedoms as attributes of national citizenship, thus linking the individual and the nation-state. Citizenship acquired exclusionary properties through compulsory education, conscription, and national welfare, all of which defined culturally unified and sacred entities by creating boundaries around them (Anderson 1983; Hobsbawm and Ranger 1983; Weber 1976). These institutions erected a variety of barriers—physical borders, ideological boundaries, national languages, and moral obligations to the state—all of which impeded migration. The labor of individuals was reconstructed as a national resource, and individual capacities were defined as central to national economic and social progress. As it became increasingly important who was in and who was out, the states attempted to control any movement of population across their borders by means of elaborate immigration laws. In the early twentieth century, passports and national identity cards were introduced, formalizing the status of the national citizen and, by contrast, the alien.

Nevertheless, individual rights and liberties, which were embedded in the concept of citizenship, opened the way for many forms of immigration. Pursuit of economic well-being stimulated major population movements to new geographies of employment in the nineteenth and early twentieth centuries. During this period, around 52 million Europeans left their countries and about 72 percent of them settled in North America (Moch 1992:147), where national definition was not yet as exclusive as it was in Europe.

**Contemporary International Migrations: Guestworker Systems**

With the consolidation of the nation-state and nationalism in the twentieth century, international migration took a different course. Western industrialized countries became large-scale importers of workers, while government control, protective
legislation, and compulsion came to dominate population movements. Accordingly, the pre–World War II period exhibited the following characteristics.

- A decrease in European emigration, with greater numbers moving in than out. German emigration, for example, dropped from over 1 million to less than 300,000 between 1890 and 1900 (Böhnig 1978:15).
- An increase in the number of migrants returning to their home countries. In the 1910s, the rates of return from the United States were 63 percent for northern Italians, 56 percent for southern Italians, 51 percent for Spaniards, 41 percent for Russians, 31 percent for Poles, and 21 percent for Germans (Piore 1979:151).
- Early forms of temporary migration designed to keep citizenship intact: the indentured labor system of the British and Dutch colonies, and increased use of seasonal workers. In the Caribbean, the need for additional labor for sugar production was met by the importation of a half-million workers from India, “who typically came on five-year contracts with free transportation both ways” (Sassen-Kooi 1980:6). Seasonal migrant workers recruited from distant tribes were frequently used in African plantations and mines (Amin 1974).
- An increase in immigration by foreigners who were easily assimilable, like those from colonies or previous colonies to core countries (Böhnig 1979a).
- The establishment of systematic immigration rules and alien controls in many European countries by the end of the World War I (Hammar 1985e).
- A tightening of control even in the United States. The Congressional laws of 1921 and 1924 introduced a quota system to “maintain the cultural and racial homogeneity of the United States by the admission of immigrants in proportions corresponding to the composition of the white population” (Böhnig 1979a:189).
- Political relocations of populations to homogenize language and culture within national boundaries. In the course of nation-state formation and redefinition, many states have coercively relocated or expelled their ethnic minorities. Large numbers of people were exchanged between various European countries from 1918 to 1939. The most notable were 1.1 million Poles from Russia to Poland; 700,000 Germans from western Poland to Germany (Tilly 1978:61); and, by the Treaty of Lausanne, 190,000 Greeks to Greece from Turkey and 388,000 Muslims to Turkey from Greece (Davis 1974:101).
- In some states, as part of an attempt to make citizenship and nationality correspond, the ex post facto definition as alien of certain groups, which previously had been part of the polity (Jews in Europe, Armenians in Turkey, and Chinese in Malaysia).

As the shortage of workers in the industrialized Western countries became more acute, especially after World War II, restrictions on the inflow of populations were relaxed—though in a “mercantilistic fashion,” which is to say, that “laborers were welcome, even actively recruited, but not supposed to stay or to bring their families” (Böhnig 1978:16). Between 1950 and the early 1970s, Austria, Belgium, Germany, France, Luxembourg, the Netherlands, Sweden, and Switzerland all admitted large numbers of foreign nationals as guestworkers into their countries. France and Germany, for instance, each received more than two million foreign workers. And in the same period the number of foreigners in the Swiss labor force multiplied seven times, from 90,000 to 700,000 (Castles and Kosack 1973:32–40).

Most of the foreign labor came from the Mediterranean countries of Italy, Spain, Portugal, Greece, Yugoslavia, Turkey, and Morocco. However, not all migrant workers were part of official guestworker systems. Britain, France, and the Netherlands received large numbers of migrants from their colonies or former colonies (India and Pakistan, the Caribbean, Algeria, Surinam and Indonesia). Although colonial workers had a legal right to permanent residency and a more privileged status in general, they, too, were treated as temporary. As colonies acquired independence, European states redefined their
relationships with ex-colonial populations. Algerians in France, Surinamese in the Netherlands, and Pakistanis in Great Britain are now defined as aliens and subject to general immigration policies.

In the early 1980s former labor-exporting countries of Europe, such as Italy, Spain, Portugal, and Greece, also began to receive large numbers of migrants, most from the southern Mediterranean—Morocco and Tunisia—but also from Senegal, Gambia, Ethiopia, the Philippines, Sri Lanka, and, more recently, from the Balkans. By 1990 foreign residents numbered 70,000 in Greece, 108,000 in Portugal, 415,000 in Spain, and 781,000 in Italy (SOPEMI 1992). In all these cases, migrant workers comprise both skilled and unskilled labor, both men and, increasingly, women. The majority are employed either as industrial workers or in the service sector, while a notable category of the self-employed is emerging among the more established migrant groups.

Guestworker systems are widespread in other regions of the world as well. In South Africa, such systems are set up for workers from “homelands” and from other African countries. The United States had its formal experience with guestworkers during the Bracero program, and still carries out such arrangements officially and unofficially with Mexico. Japan has a foreign minority of about 800,000 Chinese and Koreans, whose forebears were brought over as forced labor in the 1920s and ‘30s (Holloway 1989). In addition, Japan employs about 50,000 South Americans of Japanese descent, and an estimated 300,000 foreigners, mostly from Iran, Pakistan, and Bangladesh, work and reside there illegally (Holloway 1989; Salt 1992-1102). In Africa, Libya, the Ivory Coast, Gabon, Zaire, Zimbabwe, Ghana, and Nigeria have been the main destinations for foreign labor from other parts of the continent. In Latin America, Venezuela employs Colombians in oil production, and Argentina receives workers from Chile, Bolivia, and Paraguay. The eastern European countries, especially the former Soviet Union, Czechoslovakia, and the Democratic Republic of Germany, used large numbers of Vietnamese, Mozambican, Angolan, and Ethiopian workers. In the oil-producing Gulf emirates, where the percentage of foreign labor significantly exceeds that of national workers (ILO 1984), temporary migration is used to protect the “identity” of local people (Böhning 1978). Most foreign laborers in the Gulf are from other Middle Eastern countries, notably Egypt, North Yemen, Palestine, and Jordan, but they also come from Asian countries, such as Pakistan, the Philippines, Korea, Sri Lanka, and Thailand. Since 1967, Palestinians in the occupied territories have been recruited as unskilled workers into Israel’s labor markets (Semyonov and Lewin-Epstein 1987). In addition, there is a sizeable work force of Palestinians, Egyptians, and Turks in Libya, Iraq, and Saudi Arabia. The list and combinations of sending and receiving countries have grown impressively with time, undermining political and geographical distance and rationalities.

Temporariness is the formal characteristic that all contemporary labor migration systems share. The principle of temporariness has been institutionalized in guestworker systems. As the name implies, guestworker programs are designed to satisfy immediate labor force demands by importing temporary workers (Rüst 1978). The governing assumption is that foreign workers can be sent back at times of unemployment. The migratory flow is expected to behave in accord with labor market requirements; and economic cycles are considered the main determinant of immigration regimes.

The normative model of migration developed within this framework is essentially an “exclusionary” one, supported by ideologies of nationhood and citizenship. In contrast to the “inclusionary” model of the nineteenth-century immigrations, which depicts a system that favors the penetration and integration of new migrants, the “exclusionary” model sanctions cohesive cultural and population boundaries (Baker et al. 1985). As reflected in official statements and ideologies, guestworkers are not expected to partake in the national culture or polity.

The guestworker experience, however, challenges this normative model. Foreign worker populations have become permanent, contrary to official government policies and rhetoric. Foreign labor recruitment had formally ceased throughout western Europe by 1974. Yet, the former labor-importing countries face growing numbers of foreign residents, because of low return rates, ongoing family reunification, and natural population growth. In addition, political refugees have become a
substantial component of international migration flows. Between 1986 and 1990, the average yearly growth of foreign populations was 9.2 percent in Austria, 1.3 percent in Belgium, 3.7 percent in Germany, 4.6 percent in the Netherlands, 4.5 percent in Sweden, and 3.2 percent in Switzerland (SOPEMI 1992:17). Increasing unemployment and repatriation programs have not expedited mass-scale return of former guestworkers. And despite further restrictive efforts, European states have not been fully successful in preventing new flows of migrants from abroad.

**Demographics of Migrant Populations in Europe**

Currently, about 15 million migrants in Europe are foreigners in their countries of residence, which is to say that they do not have a formal citizenship status. Of these, only 5 million are European Community nationals. Well over half of the foreigners have the status of permanent resident alien, which can be established by living in host countries for a period of from two to ten years. There are also an estimated 3 million undocumented foreigners residing in western European countries.

Tables 2.1 and 2.2 summarize trends in the proportion of foreigners in selected European countries with respect to total population and total labor force in the postwar period. The major growth in foreign populations took place before the mid-1970s, rising from an approximate 5 million in 1960 to some 12 million in 1976 (table 2.1). Since then, foreign populations have grown steadily but more slowly, except in France and Switzerland, where they have stabilized. The proportion of foreigners in the work force decreased in all countries between 1975 and 1987, except in Belgium, where a notable increase occurred (table 2.2). However, at the end of the decade, the foreign labor population in most European countries rose again.

By 1990, foreigners in the western Europe made up between 3 and 16 percent of their host country's total population, with less than 4 percent only in Denmark and Britain, whereas in 1960 foreigners amounted to more than 4 percent of total population in only three countries: France, Germany, and Switzerland. Large foreign populations now inhabit France, Germany, Belgium, and especially Switzerland, where foreigners number

<table>
<thead>
<tr>
<th>1960</th>
<th>1976</th>
<th>1990</th>
</tr>
</thead>
<tbody>
<tr>
<td>Absolute</td>
<td>%</td>
<td>Absolute</td>
</tr>
<tr>
<td>Denmark</td>
<td>17</td>
<td>0.4</td>
</tr>
<tr>
<td>Britain</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>Netherlands</td>
<td>118</td>
<td>1.0</td>
</tr>
<tr>
<td>Austria</td>
<td>102</td>
<td>1.4</td>
</tr>
<tr>
<td>Sweden</td>
<td>191</td>
<td>—</td>
</tr>
<tr>
<td>France</td>
<td>—</td>
<td>4.7</td>
</tr>
<tr>
<td>Germany</td>
<td>686</td>
<td>1.2</td>
</tr>
<tr>
<td>Belgium</td>
<td>453</td>
<td>4.9</td>
</tr>
<tr>
<td>Switzerland</td>
<td>495</td>
<td>9.2</td>
</tr>
</tbody>
</table>


*Excludes seasonal and frontier workers.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Absolute</td>
<td>%</td>
<td>Absolute</td>
</tr>
<tr>
<td>Denmark</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>Netherlands</td>
<td>216</td>
<td>4.4</td>
</tr>
<tr>
<td>Britain</td>
<td>1,696</td>
<td>6.5</td>
</tr>
<tr>
<td>Sweden</td>
<td>251</td>
<td>6.0</td>
</tr>
<tr>
<td>Austria</td>
<td>185</td>
<td>6.1</td>
</tr>
<tr>
<td>France</td>
<td>1,900</td>
<td>8.5</td>
</tr>
<tr>
<td>Germany</td>
<td>2,120</td>
<td>8.0</td>
</tr>
<tr>
<td>Belgium</td>
<td>278</td>
<td>6.9</td>
</tr>
<tr>
<td>Switzerland</td>
<td>711</td>
<td>24.0</td>
</tr>
</tbody>
</table>


Note: Data reported are not always comparable; in certain cases foreign labor refers only to foreign wage and salary earners, excluding the self-employed and unemployed. Also, frontier and seasonal workers are generally not included.

*Includes the unemployed, except in Britain and the Netherlands.

*1982 figures.

one-sixth of the total population, and almost one-fifth of the work force.

Foreign workers in various countries represented from 2 to 18 percent of the total labor force by 1990, the lowest in Denmark and the highest in Switzerland. These numbers are striking, especially if we consider that labor migration to Europe formally ended in 1974, and that unemployment throughout western Europe has risen. Overall, foreign populations show a demographic increase, in spite of decreasing opportunities for work.

This increase has been reinforced in the 1990s by an upsurge of refugees. In western Europe, the number of asylum seekers increased from 65,400 in 1983 to 544,400 in 1991 (Rogers 1992:1121). Despite restrictive regulations, asylum remains a privileged form of migration. Attempts to stop or repatriate asylum seekers receive international attention, and are heavily debated within and outside Europe. According to one estimate, on average, 30 percent of applicants are granted asylum in Europe. Among those rejected, 75 to 85 percent stay in the country of asylum, nonetheless (Rogers 1992:1122).

Table 2.3 shows the proportion of naturalizations in relation to foreign population in various European countries. Even after a considerable length of residence in host countries, migrant populations remain foreign. The average length of residence for migrant workers in Europe is more than 15 years, whereas the annual rate of naturalization is relatively low, only 1.9 percent, on the average (1990 figure). In addition, naturalization rates have not changed significantly over time; where they have, they have decreased rather than increased. Only in France and Germany has there been a rise in the last decade, albeit minimal. Belgium, Switzerland, and Germany have especially low percentage rates. Sweden's uncharacteristically high percentages may be accounted for by its large proportion of political refugees, who in general naturalize at higher rates. Table 2.4 further illustrates the relatively low incidence of naturalization in various host countries.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Belgium</td>
<td>0.8</td>
<td>1.0</td>
<td>0.2</td>
</tr>
<tr>
<td>Switzerland</td>
<td>1.5</td>
<td>1.8</td>
<td>0.8</td>
</tr>
<tr>
<td>Germany</td>
<td>0.4</td>
<td>0.4</td>
<td>1.0</td>
</tr>
<tr>
<td>France</td>
<td>1.1</td>
<td>1.2</td>
<td>1.5</td>
</tr>
<tr>
<td>Denmark</td>
<td>2.6</td>
<td>3.8</td>
<td>1.9</td>
</tr>
<tr>
<td>Netherlands</td>
<td>1.1</td>
<td>4.1</td>
<td>2.0</td>
</tr>
<tr>
<td>Britain</td>
<td>4.2*</td>
<td>3.0*</td>
<td>2.9</td>
</tr>
<tr>
<td>Austria</td>
<td>2.6</td>
<td>2.9</td>
<td>2.9</td>
</tr>
<tr>
<td>Sweden</td>
<td>4.8</td>
<td>4.9</td>
<td>3.7</td>
</tr>
</tbody>
</table>


Note: The numbers reported may not be comparable across cases; changes in nationality because of marriage or birth are not always reported.

*The drastic drop was mainly caused by a change in the Dutch Naturalization Act in 1988.
*1975 figure.
*1981 figure.

<table>
<thead>
<tr>
<th>Country</th>
<th>As Percentage of Total Foreigners</th>
<th>As Percentage of Total Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Germany</td>
<td>6.0</td>
<td>0.5</td>
</tr>
<tr>
<td>Sweden</td>
<td>10.4</td>
<td>2.4</td>
</tr>
<tr>
<td>Switzerland</td>
<td>10.4</td>
<td>1.5</td>
</tr>
<tr>
<td>France</td>
<td>12.7</td>
<td>0.9</td>
</tr>
<tr>
<td>Netherlands</td>
<td>18.6</td>
<td>0.7</td>
</tr>
</tbody>
</table>


In the decade of the mid-1970s to the mid-1980s, the number of foreigners naturalized in Germany did not exceed 6 percent. Sweden, Switzerland, and France naturalized from 10 to 13 percent of their foreign populations. The rather high figure for the Netherlands reflects a significant proportion of ex-colonial residents, mostly Surinamese, who were granted citizenship. In any case, at current rates of naturalization, it may well take at least one hundred years before the foreigners all become citizens of their host countries—assuming a constant stock of foreigners, of course (see de Rham 1990:179).

Note that, unlike countries such as the United States, Canada, and Australia, with historically high immigration rates,
European states do not grant citizenship on the basis of *jus soli*, birth in the territory. France and Britain apply the principle of *jus soli* conditionally, with certain requirements of residence and registration. In Europe, assumption of nationality is not automatic; immigrants, and their children born in the host country, have to contend with relatively restrictive naturalization procedures. Normally, there is a waiting period for application for citizenship in the host country: five years in Belgium, France, the Netherlands, Sweden, and Britain; seven years in Denmark; ten years in Austria and Germany; and twelve years in Switzerland. In some cases, immigrants must also fulfill further conditions, such as good conduct (no criminal record), sufficient knowledge of the language and means of subsistence, or assimilation (see Brubaker 1989b, Niessen 1989, and de Rham 1990).

In the 1990s, countries with more restrictive, lineage-based rules (Belgium, Germany, Switzerland, and the Netherlands) have widened access to citizenship (SOPEMI 1992). Switzerland (since 1990) and the Netherlands (since 1991) have allowed for dual citizenship. A 1991 act in Belgium grants citizenship to third-generation immigrants automatically, and second-generation immigrants under the age of 12 can become citizens at the request of their parents. In Germany, the 1990 Foreigners Law, and a 1993 government decree, made virtually automatic the naturalization of immigrant children between the ages of 16 and 23 who were born or had lived in Germany more than eight years. During the same period, the French government tightened its nationality code, which had guaranteed automatic citizenship at age 18 to immigrant children born in France. Under the new legislation, to become citizens, immigrant children need to apply formally between the ages of 16 and 21.

Yet, difficult procedures and requirements only partially explain the low naturalization rates. Recent surveys show that many eligible migrants do not plan to give up their original nationality. According to a nationwide survey of foreigners conducted by the Ministry of Labor and Social Affairs of Germany in 1986, half of those surveyed planned to remain permanently or at least for “many years to come,” but only 6 percent expressed interest in taking on German citizenship (Der Tagesspiegel, 8 August 1986). The few surveys taken in other European countries support the assertion that immigrants, even in the second generation, tend to be reluctant to become nationals of their host countries (de Rham 1990). When the inclination exists, it is often accompanied by demands for dual citizenship. In a 1993 survey commissioned by the Social Services Ministry of North Rhine-Westphalia, more than half of the foreigners polled indicated interest in becoming German citizens if the laws allowed dual citizenship (Reuter news agency, 27 September 1993). In fact, even in traditional immigration countries, the propensity for becoming citizens of the host country is lower than before. In Canada, for example, of the 4 million immigrants entering the country between 1945 and 1975, only 1.5 million became citizens (Ferguson 1974:38). In the United States, according to the Immigration and Naturalization Service statistics, currently about 37 percent of legal immigrants apply for citizenship, in comparison to 67 percent in 1946 (New York Times, 25 July 1993).

All of these statistics reveal the foreign yet permanent character of postwar migrants in Western countries. Despite their permanence in European polities, migrant populations have not been incorporated as part of a formal citizenship scheme. This circumstance contradicts the traditional model of immigration, predominant in American literature, in which foreigners are expected to be absorbed, in time, as naturalized citizens. In earlier immigration systems, incorporation assumed that foreigners would be transformed into formal citizens and assimilated into the cultural patterns of the national polity, mainly through socialization in schools. Immigrants were either treated as prospective members and eventually naturalized, or else not considered part of the polity and categorically excluded, as were turn-of-the-century indentured Chinese laborers in the United States. The condition of postwar migrants defies such binary precepts embodied by classical models of immigration. As I show later, even though postwar migrants are largely foreign, they are incorporated into various institutions and structures of host societies. They are formally included in state policies, share in governmental budgets, welfare schemes, educational systems, and trade unions, and are accorded many rights and privileges of citizenship.
CHAPTER TWO

Consider, however, the classical depiction of guestworkers in the literature:

It is crucial that the workers who are admitted should be "guests," not immigrants seeking a new home and a new citizenship . . . They are brought in for a fixed time period, on contract to a particular employer; if they lose their jobs, they have to leave; they have to leave in any case when their visas expire. They are either prevented or discouraged from bringing dependents along with them . . . Mostly they are young men or women in their twenties or thirties; finished with education, not yet infirm, they are a minor drain on local welfare services (unemployment insurance is not available to them since they are not permitted to be unemployed in the countries to which they have come). Neither citizens nor potential citizens, they have no political rights. The civil liberties of speech, assembly, association—otherwise strongly defended—are commonly denied to them, sometimes explicitly by state officials, sometimes implicitly by threat of dismissal and deportation. (Walzer 1983:56–57)

How do we explain, then, the growing foreign populations in western European countries, even in times of economic stagnation and restrictive policies? How can we interpret the discrepancies between assumed models, on the one hand, and demographics and institutional incorporation of guestworkers, on the other? What accounts for the increasing rights and privileges of aliens who continue to reside in host societies without formal citizenship status? And why is it not possible to sustain exclusionary guestworker systems that are immanently entrenched in national models of citizenship? The chapters that follow examine patterns of incorporation of contemporary guestworkers, testifying to changes in the membership status of postwar migrants and the relationship between the alien and the host polity.

CHAPTER THREE

Explaining Incorporation Regimes

The incorporation of postwar migrants is shaped both by the historically encoded membership systems of European host polities and by global changes in the concept and organization of individual rights. In the postwar era, world-level pressures toward more expanded individual rights have lead to the increasing incorporation of foreigners into existing membership schemes. However, by extending membership beyond national citizenry, these pressures also work to transform the existing models, making national citizenship peculiarly less important.

Analyzing the incorporation of guestworkers into European polities, my study takes a different course than works that concern how well migrants adjust