Foreword

The Fund's director of communications, Elizabeth McPherson, provided editorial supervision for this volume, which is comprised of papers prepared for the conference. Publications on current citizenship issues, particularly as seen in crossnational perspective, are few. This one—enhanced by Rogers Brubaker's clear and elegant introduction—contains much that is new and insightful. We dare to hope that it will help government policymakers and others who have to grapple with the growing problem of determining the status and rights of persons admitted within their borders.

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INTRODUCTION

William Rogers Brubaker

Massive postwar migrations have posed a fundamental challenge to the nation-states of Europe and North America. They have compelled these countries to reinterpret their traditions, to reshape their institutions, to rethink the meaning of citizenship—to reinvent themselves, in short, as nation-states.

This book addresses one important aspect of this challenge. It is concerned with the implications of immigration for the theory and practice of citizenship and membership in the United States, Canada, the United Kingdom, France, West Germany, and Sweden. Much has been written about immigration to these countries, but little has been written about citizenship. Through a broad comparative discussion of citizenship and social membership—the first of its kind—the book aims to bring fresh perspectives to bear on the intensifying policy debates about immigration and citizenship.

The authors make arguments about how citizenship and membership ought to be organized. And they make clear how citizenship and membership are in fact organized. The essays in the first part of the book incline toward political argument, the essays in the second part toward policy analysis. But the distinction is not a rigid one. Most of the essays involve both argument and analysis.

The essays in the first part of the book articulate a wide variety of viewpoints. This reflects the preference of the German Marshall Fund (and of this writer) for a lively clash of perspectives over a chorus of carefully orchestrated bromides. The authors challenge traditional views of citizenship and membership. Joseph Carens disputes the traditional, state-centered view that moral considerations are out of place in decisions about admission to citizenship. Peter Schuck argues that American citizenship has lost much of its value and meaning. Kay
Hailbronner challenges the widespread notion that the Federal Republic of Germany has an unreasonably restrictive citizenship policy. And Tomas Hammar takes issue with the traditional negative attitude towards dual citizenship.

The essays in the second part of the book look through a comparative lens at citizenship and membership policies and practices. I discuss citizenship law and naturalization practices. Mark Miller, questioning the traditional view of noncitizens as politically passive, analyzes the many ways in which noncitizen immigrants participate in politics. And in the concluding essay, I discuss the economic and social rights of noncitizens.

The six countries examined in the book have very different traditions of immigration and citizenship. Canada and the United States are classical countries of immigration whose citizenship policies have long been geared to mass immigration. Britain and France are former colonial powers whose immigration and citizenship policies reflect in complex ways the legacy of colonialism. Sweden and Germany are traditional countries of emigration whose postwar prosperity led to the recruitment, initially on a temporary basis, of migrant workers.

Despite these differing traditions, each of these countries today confronts similar problems. During the last quarter-century, each has experienced a "new immigration"—to borrow the expression used to describe the surge in immigration from Southern and Eastern Europe to the United States in the late 19th century. And the United States has experienced a "new new immigration." Thus Asia is now the leading source of immigration to both Canada and the United States; the Indian subcontinent and the Caribbean displaced Ireland in the 1960s as the leading source of immigration to Britain; half of the foreign population in France is now from Africa or Asia (mainly from North Africa); Turks surpassed Italians during the 1970s as the largest group of foreign workers in Germany; and Asia has recently displaced Nordic countries as the leading source of immigration to Sweden.

Contemporary debates about citizenship are simultaneously debates about nationhood. They are debates about what it means, and what it ought to mean, to be a member of a nation-state in today's increasingly international world. To place these debates in perspective, this introductory essay begins by evoking in general terms the challenge posed by immigration to the nation-state and sketching the historical background to current debates about immigration and citizenship in each of the six countries. Next, it outlines the major questions facing policymakers and sketches the options they have in addressing these questions. The introduction concludes with some remarks about the individual essays.

THE CHALLENGE TO THE NATION-STATE

Citizenship today means membership of a nation-state. To note this is to point to a basic fact of political and social organization. We live in a world of nation-states. Each claims a certain fraction of the human population as its own, and each aspires to mold this population—its citizenry—into something more than a mere aggregate of individuals or a mere congeries of groups. Each aims to create a cohesive and in some respects homogeneous nation. The persistent ethnic strife that afflicts many polities is a brutal reminder that this aspiration often goes unrealized. The aspiration, though, is shared even by such fundamentally multicultural polities as India and the Soviet Union.

But the nation-state is not only a fact. It is also an idea or ideal—a way of thinking about political and social membership. It is a deeply influential model of membership that informs much current debate on immigration and citizenship. Membership, according to this model, should be egalitarian, sacred, national, democratic, unique, and socially consequential. The membership status of postwar immigrants to Europe and North America, however, deviates from this model in every respect. This has strained deeply rooted shared understandings about the way social and political membership ought to be organized, and it has occasioned talk of a "crisis of the nation-state."

Because it remains so influential, I want to look more closely at this model of membership and say something about each of its components. In sketching this model, I am not endorsing it. I want simply to summarize certain inherited ideas and ideals that continue to inform political debates and discussions about immigration, about nationality and citizenship, about patriotism and national identity, about military service and the welfare state. I want to sketch the backdrop of taken-for-granted ideas and ideals against which the politics of membership unfolds today.

What are these ideas and ideals? First, state-membership should be egalitarian. There should be a status of full membership, and no other (except in the transitional cases of children and persons awaiting naturalization). Gradations of membership status are inadmissible; nobody should be a second-class citizen.
Second, membership should be sacred. Citizens should be prepared to make sacrifices—etymologically, to perform "sacred acts"—for the state. They should be willing to die for it if need be. "Profane" attitudes toward membership, involving calculations of personal advantage, are profoundly inappropriate.

Third, state-membership should be based on nation-membership. The political community should be simultaneously a cultural community, a community of language, mores, or belief. Only thus can a nation-state be a nation's state, the legitimate representative and authentic expression of a nation. Those aspiring to membership of the state must be or become members of the nation. If not (presumptively) acquired through birth and upbringing, such nation-membership must be earned through assimilation.

Fourth, membership should be democratic. Full membership should carry with it significant participation in the business of rule. And membership itself should be open: since a population of long-term resident nonmembers violates the democratic understanding of membership, the state must provide some means for resident nonmembers to become members. Over the long run, residence and membership must coincide.

Fifth, state-membership should be unique. Every person should belong to one and only one state. Statelessness can be catastrophic in a world in which even so-called human rights are enforceable for the most part only by particular states. And dual (or multiple) citizenship has long been considered undesirable for states and individuals alike. There are legal techniques for regulating and mitigating the conflicts, inconveniences, and ambiguities it causes. But these techniques cannot solve the central political problem of dual citizenship—the problem of divided allegiance.

Lastly, membership should be socially consequential; it should be expressed in a community of well-being. Membership should entail important privileges. Together with the duties mentioned above, these should define a status clearly and significantly distinguished from that of nonmembers. Membership should be objectively valuable and subjectively valued—it should be prizeworthy and actually prized.

This model of membership is largely vestigial. It is riddled, moreover, with unresolved internal tensions. The idea of an egalitarian and democratic membership points in one direction; the idea that membership should be sacred and based on cultural belonging points in a very different direction, with different policy implications. That the model survives is due mainly to the lack of a coherent and persuasive alternative. We lack a developed political theory of partial or limited state-membership. We lack a political theory of "desacralized" membership, based solely on calculations of personal advantage, or of political membership dissociated from cultural belonging, or of dual or multiple membership.

Because it is vestigial, the model is significantly out of phase with contemporary realities of state-membership. There are conspicuous deviations from the model that have nothing to do with immigration. The desacralization of state-membership, for example, has more to do with the emotional remoteness of the bureaucratic welfare state and the obsolescence of the citizen army in the nuclear age than it does with immigration and occasional naturalizations of convenience. And if modern-day citizenship is not very robustly democratic, this has more to do with the attenuated participation of most citizens in the exercise of sovereignty than it does with the exclusion of noncitizens from the franchise.

Still, the postwar immigration has accentuated existing deviations from the nation-state model and generated new ones. These include the proliferation of statuses of partial membership; the declining value of citizenship; the desacralization of membership through the calculating exploitation of the material advantages it confers; the increasing demands for, and instances of, full membership of the state without membership of the cultural nation; the soaring numbers of persons with dual citizenship; and the long-term exclusion of large numbers of apparently permanent residents from electoral participation. These membership trends deviate from every component of the nation-state model. And each one arises from the unexpected development of postwar immigration.

Unexpected especially on the Continent: for what has become a settlement immigration began in France and Germany and Sweden as a temporary labor migration. Neither a strictly temporary guest-worker system nor unambiguous and accepted settlement immigration poses insuperable problems of membership. But an imperceptible slide from labor migration to settlement immigration, a slide only partially and belatedly acknowledged by the immigrants themselves and by the country of immigration, could not help generating delicate problems of membership. And equally delicate problems of membership are posed by the gradual settlement of undocumented alien workers and their families in the United States.

The membership status of these migrants-turned-immigrants has developed on the Continent in an ad hoc fashion with the piecemeal
administrative, legislative, and judicial acknowledgment of their membership status. This piecemeal process of inclusion contrasts with the "total" transformation effected by naturalization. Paradoxically, the further this process has gone, the weaker the incentive to naturalize. Ad hoc enlargements of migrants' rights may obstruct rather than clear the path to full membership, trapping large numbers of migrant-turned-immigrants in an intermediate status, carrying with it many of the privileges and obligations of full membership but excluding two of the most important, symbolically and practically: the right to vote and the duty of military service.

The immigration was unexpected, too, in its volume and in its steadily increasing ethnic diversity. This holds for the United States and Britain (and, as far as ethnic diversity is concerned, for Canada) as well as for the Continent. Against the backdrop of the model of membership sketched above, this threefold unexpectedness helps to explain the profound political uncertainty of North America and especially Europe in the face of today's increasingly settled and increasingly assertive immigrant population.

Not everyone shares this uncertainty, of course. Fundamentalists defend the traditional model of the nation-state, stressing in particular the idea that state-membership presupposes nation-membership. Multicultural pluralists, on the other hand, deny any validity to this model, arguing for new forms of political membership that would mirror an emerging postnational society. Fundamentalists demand of immigrants either naturalization, stringently conditioned upon assimilation, or departure; multicultural pluralists demand for immigrants a full citizenship stripped of its sacred character and divorced from nationality. Neither position is particularly nuanced. Fundamentalists treat the nation-state as something frozen in social and political time; theirs is a profoundly anachronistic interpretation. Multicultural pluralists, in their haste to condemn the nation-state to the dustbin of history, underestimate the richness and complexity of the nation-state model. If suitably reinterpreted to take account of the changing economic, military, and demographic contexts of membership, the nation-state model may have life in it yet.

Traditions of nationhood and the politics of citizenship

The ideas and ideals sketched above inform the politics of citizenship on both sides of the Atlantic. Yet, for historical reasons, the contours of debate vary from country to country.

Above all, there is a basic difference between nations constituted by immigration and countries in which occasional immigration has been incidental to nation-building. Canada and the United States have a continuous tradition of immigration. They were formed and reformed as nations through immigration, and immigration figures prominently in their national myths.

No European country is a classical country of immigration in this sense. This is not to say that Europe has no historical experience with immigration. Industrialization in Europe as elsewhere was accompanied by massive labor migrations, often across state boundaries, and often leading to settlement. Poles in the coal mines of the Ruhr and on the Junker estates of Prussia, Irish in the northern industrial cities of England, Belgians and Italians in the frontier and industrial regions of France—their and other labor migrants of the second half of the 19th century became permanent settlers.

Yet immigration has not been central to European nation-building, not even in France. Concerned about the low birth rate and about the devastating losses in the world wars of this century, the French state has long promoted immigration for demographic reasons. In sheer numbers, immigration has been much more important in France during the last hundred years than in any other European country. Yet not even in France does immigration form part of the national myth.

The massive immigration of the last quarter-century has not transformed European countries into countries of immigration in the classical North American sense. Even Sweden, which has gone furthest in acknowledging and accepting its postwar labor migrants as permanent settlers, makes it clear that it is not and cannot become a country of immigration in the classical sense.

Debate about immigration and citizenship in each of our six countries is informed by distinctive traditions of nationhood—by deeply rooted understandings about what constitutes a nation. A few observations about these traditions may help to explain some of the striking national differences in the contemporary politics of citizenship.

France was the first nation-state, and it has remained the nationstate par excellence. French conceptions of nationhood and citizenship bear the stamp of their revolutionary origin. The nation, in this tradition, has been conceived mainly in relation to the institutional and territorial frame of the state: political unity, not shared culture, has been understood to be its basis. "What is a nation?" asked Abbé Sleyès in his famous pamphlet of 1789, and answered: "a body of
associates living under one and the same law and represented by one and the same legislature." But if political unity has been fundamental, the striving for cultural unity has been crucially expressive of French nationhood. Political inclusion has entailed cultural assimilation, for regional cultural minorities and immigrants alike. The universalist, inclusive theory and practice of citizenship have depended on confidence in the assimilatory workings of schools, the army, the church, unions, and political parties—confidence that has waned markedly in recent years.3

If the French conception of nationhood has been universalist, assimilationist, and state-centered, the German conception has been particularist, organic, and Volks-centered. Because national feeling developed before the nation-state, the German idea of the nation was not originally a political one, nor was it linked with the abstract idea of citizenship. This pre-political German nation, this nation in search of a state, was conceived not as the bearer of universal political values, but as an organic cultural, linguistic, or racial community—as a Volksgemeinschaft. On this understanding, ethnic or cultural unity is primary and constitutive of nationhood, while political unity is derivative. While this way of thinking about nationhood has never had the field to itself, it took root in early 19th century Germany and has remained available for political exploitation ever since; it finds expression even in the Basic Law of the Federal Republic.4

One would expect citizenship defined (as in France) in political terms to be more accessible to culturally distinct immigrants than membership defined (as in Germany) in ethnic or cultural terms. This is in fact the case. The policies and politics of citizenship in France and Germany have been strikingly different since the late 19th century, and they remain so despite converging immigration policies and comparable immigrant populations. As a result, a substantial fraction of the French immigrant population has French citizenship, while only a negligible fraction of the corresponding West German population has German citizenship.

The postwar migrations, to be sure, have placed considerable strain on French and German traditions alike. The French tradition of assimilation finds few defenders today: the multiculturalist left and immigrant organizations argue that immigrants should not be assimilated, the exclusionary right that they (the North Africans in particular) cannot be assimilated. The far right, led by Jean-Marie Le Pen, has embarked on a major campaign to "revalorise" French citizenship by restricting immigrants' access to it. Le Pen's slogan—"Etre français, cela se mérite"—means roughly: "to be French, you have to deserve it."

Nor is it only the French tradition of inclusion via assimilation that is under strain. The current conservative government of West Germany has had to acknowledge that large numbers of Turkish immigrants have in fact become permanent immigrants. It has even proclaimed a public interest in the naturalization of second-generation immigrants.

It is too early to predict the outcome of the contemporary politics of citizenship in France and West Germany. But the bearing of traditional shared understandings of nationhood on this politics is clear. French moves toward a more restrictive and German moves toward a more liberal politics of citizenship have encountered strong resistance. The French government withdrew its proposed, mildly restrictive reform of nationality law in December 1986 after meeting unexpectedly strong opposition. (Dissenters included the venerable Council of State, which criticized the reform as "contrary to republican tradition and principles.") It subsequently appointed a nonpartisan commission to study the issue; the changes proposed in the commission's report, if enacted, would actually liberalize access to French citizenship for second-generation immigrants. On the other hand, every recent proposal to liberalize German nationality law has foundered in the upper house. A central argument has been that the current restrictive nationality law is appropriate for a country that, by inescapable tradition, is not and cannot become a country of immigration.

In Sweden, as in France, national feeling and state institutions developed in tandem long before the age of nationalism. The sense of nationhood emerged in the course of political and military struggles against Denmark in the late 15th and 16th centuries, before a distinctively Swedish culture existed. Literature, art, and language were then permeated by Danish and German influence. Nor were there sharp ethnic distinctions between Swedes and Danes. In these circumstances, national feeling was expressed in an attachment to political and institutional traditions, not in the sense of ethnic or cultural distinctiveness. Later, to be sure, national feeling did find expression in a distinctive culture. And contemporary Sweden certainly has a relatively homogeneous national culture. But this national culture has never carried a strong political charge in the Swedish tradition. It was not harnessed to a project of domestic assimilation and overseas imperialism, as in France, nor to a movement for national unification, as in Germany, nor to a campaign for national autonomy or indepen-
dence, as occurred in 19th-century Finland and Norway, neither at that time a sovereign state. Sweden's long, continuous history as an independent state with a more or less homogeneous population, and its position as the dominant Scandinavian power from the 17th century on, provided no occasion for the politicization of cultural identity.

The absence of a tradition of ethnic or cultural nationalism may help explain why Sweden has been able to make citizens of its postwar immigrants with so little fuss or friction. A further reason is to be found in the composition of the immigrant population, which, until recently, was two-thirds Nordic and overwhelmingly European. The ethnic diversity of the immigrant population has increased markedly in the last decade, as large numbers of refugees from Chile, Turkey, Vietnam, Iran, and Iraq have been granted immigrant status. And a small fundamentalist opposition has recently made some gains. But while this may encourage centrist politicians to adopt a more restrictive policy on refugee admissions, it seems unlikely to affect Sweden's liberal policy on admission to citizenship.

Early political unification led to the early development of national feeling in England. Yet neither England nor Britain ever became a nation-state on the French model—a tightly integrated political and cultural community. English rule over Scotland, Wales, and especially Ireland gave the state a composite character, and nationhood an ambiguous character. British national feeling developed, but it did not supersede English, Scottish, Welsh, or Irish national feeling.

Just as there has been no clear conception of British nationhood, so too there has been no clear conception of citizenship. The concept of citizenship as membership of a legal and political community was foreign to British thinking. Legal and political status were conceived instead in terms of allegiance—in terms of the vertical ties between individual subjects and the king. These ties of allegiance knit together the British empire, not the British nation. Until 1948, all persons born within the dominions of the king were British subjects. There was no specific citizenship status for the colonies, for Britain itself, or even for the independent Commonwealth countries.

With the dismantling of its empire, Britain has had to redefine itself as a nation-state, and to create for the first time a national citizenship. The transition has been an awkward one. France too had to negotiate the dismantling of a huge colonial empire. And, unlike Britain, it became involved in a bloody, bitter, protracted war. But at least France already had a strong identity as a nation-state and a well-established national citizenship. Britain had neither, and this contrib-

uted to the confused and bitter politics of immigration and citizenship during the last quarter-century.

Lacking a national citizenship until 1981, Britain lacked a clear criterion for deciding whom to admit to its territory. In the early postwar years, inspired by a heady vision of itself as the center of a vast multiracial Commonwealth of Nations, it continued the traditional practice of admitting all British subjects—a category now including citizens of the independent Commonwealth countries. But controls were imposed on this latter group in 1962 after a significant immigration developed from Jamaica, India, and Pakistan. This was inevitable, in view of the huge population disparity between the independent Commonwealth countries and Britain itself. More troubling was the fact that the government later drew distinctions in immigration law between persons possessing the same formal citizenship status—citizenship of the United Kingdom and Colonies. While other countries were debating the citizenship status of immigrants, Britain was debating the immigration status of citizens.8

Britain now has a national, postcolonial citizenship, and with it a clear criterion of admission to the territory. But it achieved this, in the eyes of some critics, only by drawing the lines of the national community of citizens too narrowly, and by creating a special second-class citizenship status, without the right of immigration, for residents of Hong Kong and others.

In the domain of economic, social, and political rights, immigrants in Britain generally have more rights than elsewhere. This too results from the fact that Britain has not traditionally defined itself as a nation-state. British law imposes relatively few disabilities on aliens; more important, relatively few of Britain's postwar immigrants have been aliens. Neither Irish citizens nor citizens of independent Commonwealth countries are considered aliens. Outside the domain of immigration law itself, immigrants from the Caribbean, from India, from Pakistan, and elsewhere have virtually the same rights as British citizens, including the right to vote and to run for office.

American and Canadian conceptions of citizenship and nationhood reflect the historical and contemporary importance of immigration. This distinguishes them sharply from their European counterparts. Even before American independence, the pressing need for settlers had established naturalization as central to the theory and practice of citizenship. Characteristics of naturalization—a process through which an individual expresses his or her voluntary adhesion to a state—came to be ascribed to American citizenship as such. The
War of Independence reinforced this understanding of citizenship, for it led to sharp criticism of the British conception of unchosen and perpetual subjectship. And since the new nation lacked a distinctive ethnic or cultural identity, American nationhood and nationalism had to be defined in terms of a universalistic political formula that would set it apart from the mother country.

The Civil Rights Act of 1866 and the 14th Amendment of 1868 definitively established birth in the territory (jus soli) as the criterion for the attribution of citizenship and affirmed, in principle, the primacy of national over state citizenship. In the aftermath of the Civil War, the affirmation of jus soli and of national citizenship had an explicitly egalitarian, inclusive meaning.

The traditional inclusive and universalistic self-understanding of the United States has always stood in tension with a much less practical. Free blacks, as well as slaves, were excluded from U.S. citizenship before the Civil War, even when they possessed state citizenship. Blacks continued to be excluded from full citizenship after the Civil War through a restrictive judicial reading of the 14th Amendment. American Indians were not granted automatic citizenship at birth until 1924. And the category of "aliens ineligible for citizenship," first introduced to exclude Chinese in 1882, was not finally abolished until 1952. Ethnic exclusion based on national-origin immigration quotas, moreover, persisted until 1965. Still, the voluntaristic and universalistic understanding of citizenship helped eventually to undermine the legitimacy of these exclusionary practices. High rates of immigration, liberal naturalization provisions, and the jus soli have made the United States, for most of its history, exceptionally open to the political incorporation of ethnically and culturally distinct immigrants.

This tradition of inclusion has been interrupted by periodic phases of exclusiveness. One such phase, marked by the surge of the Know-Nothing in the 1850s, occurred in response to the dramatic increase in Catholic immigration after 1830; another, culminating in the severely restrictive legislation of 1917–1924, occurred in response to the "new immigration" from southern and eastern Europe after 1890. Today, after twenty years of the "new 'new immigration'" ushered in by the liberal Hart-Celler Act of 1965 and twenty years of high levels of illegal immigration, we may be entering another such phase. Even in the present political climate, however, debates about immigration and citizenship continue to be informed by the distinctly inclusive American understanding of nationhood. Thus the legalization program of the

Immigration Reform and Control Act of 1986 acknowledged the legitimate membership claims of long-settled undocumented immigrants and of seasonal agricultural workers. And it has been taken for granted that legalized immigrants would become citizens. Newspaper reports on the legalization program sometimes described undocumented aliens as applying for citizenship, although in fact they were applying for temporary resident status and, if successful, would qualify for permanent resident status only after 18 months, and for citizenship only after another five years.

Canada, in some respects, has been even more strongly marked by immigration than the United States. Immigration has amounted to as much as five percent of the total population in a single year (1913), more than three times the highest percentage ever recorded in the United States. And the foreign-born are currently twice as numerous, in relation to population, in Canada.

Immigration policy has followed similar rhythms in the two countries. Canada, too, excluded the Chinese in the late 19th century, restricted entry after World War I, abolished discrimination by national origin in the 1960s, and has since admitted immigrants of steadily increasing ethnic diversity. Rapid naturalization has long been promoted in Canada, perhaps somewhat more vigorously than in the United States.

Yet the centuries-old French-English dualism has complicated the relation between immigration, citizenship, and nationhood in Canada. The tensions that peaked in the late 1970s have abated, but Canadian nationhood remains ambiguous and problematic. The most basic question—is Canada one nation, or two?—remains controversial.

Immigration has been related in complex ways to this dualism. Historically, dualism has not meant pluralism. Immigrants have been expected to assimilate to the French- or the English-speaking community. The large majority, even those settling in Quebec, have done the latter—a fact that sparked French resentment of immigration as an instrument of English domination. On the other hand, dualism may have engendered in recent years a greater sensitivity to the cultural identity of immigrants. A few years after becoming bilingual on the federal level, Canada adopted an official policy in support of multiculturalism. It is not clear what this means in practice. But it may encourage Canada's increasingly diverse immigrants to naturalize quickly, without feeling that they must thereby abandon their cultural identity.
QUESTIONS OF MEMBERSHIP

The nation-state is doubly bounded. It has a bounded territory and a bounded membership. States make decisions about whom to admit to their territories, and about whom to admit as members. This book is not concerned with admission to the territory. Not that this is unimportant. Quite the contrary: the intensifying demand for entry raises urgent and troubling questions about territorial boundaries. Most fundamentally: what right do states have forcibly to deny entry into their territories—particularly to persons in urgent need of food, shelter, or protection? 

Questions of membership, though, differ from questions of entry. Questions of membership concern persons already present in the territory (although not at all such persons: the vast majority of those admitted to the territory of another state are short-term visitors for business or pleasure; their membership status is not in question). Problems of membership arise, rather, for persons whose residence and participation in the economic and social life of a country have engendered significant ties to that country. 

It is of course impossible to delimit this group with any precision. Ties develop gradually, and there is no sharp divide between short-term visitors whose attachments remain firmly anchored in their country of origin and persons whose developing attachments to a new country begin to raise questions of membership—personal questions in the mind of the migrant, and policy questions for the country in which he or she resides. It is just for this reason that the personal questions and the policy questions are such difficult ones.

The policy questions are of two sorts. First, under what conditions and on what terms should such persons be admitted to full citizenship? Second, what is the appropriate status for persons who are not, or not yet, full citizens? What civil, political, economic, and social rights should they enjoy? To what obligations should they be subjected?

Access to citizenship

Citizenship is at the vital center of the political life of the modern nation-state. Whom should the state admit to the privileges of citizenship, and on what terms and conditions? The individual essays have much to say about this question. Without rehearsing their arguments here, let me simply note that the essays of Part One make arguments about admission to citizenship on two levels, linking political philosophy and public policy. They raise broad questions of political philosophy, but these questions have definite—and sometimes quite far-reaching—policy implications.

Central to the essays of Joseph Carens and Kay Hailbronner, for example, is a perennial conundrum of political philosophy: how should one weigh the claims and interests of individuals against the claims and interests of the state? Professor Carens articulates and asserts the claims of individuals, Professor Hailbronner the claims of the state. These arguments have diametrically opposed implications. Carens would compel the state to grant citizenship to all persons requesting it, providing they meet minimum residence requirements. Hailbronner defends the state's discretionary power to grant or deny naturalization in accordance with its own interests.

Tomas Hammar, too, considers the interests of individuals and the interests of the state in his discussion of dual citizenship. Traditional antipathy to dual citizenship, he suggests, results from the tendency to look at the matter primarily from the point of view of the state. From the point of view of the individual, which Hammar thinks ought to be given much more weight, the inconveniences of dual citizenship are minimal, the advantages considerable.

These essays make arguments about how the state should regulate access to citizenship. My own essay on citizenship law and naturalization practice looks at the way states do regulate access to citizenship. I consider in detail the choices open to policymakers. And I discuss the reasons that have led some countries to base citizenship on birthplace, others on parentage, some to adopt liberal, others restrictive naturalization policies. There is thus no need for further discussion here of the problem of admission to citizenship.

The membership status of noncitizens

Citizenship is a neat category. It is simple and straightforward from the point of view of the individual and from the point of view of the state. One either is or is not a citizen of a particular state. There is no middle way, no more or less, no ambiguity—except, of course, when one is a citizen of two or more states.

Membership, in contrast, is a messy category. It is complex and ambiguous from the point of view of the individual and from the point of view of the state. Unlike citizenship, membership is not an all-or-nothing, yes-or-no variable. The world cannot be neatly divided into those who are and those who are not members of a particular state.
One can be more or less a member; one can be a member in one respect but not in another.

One of the major themes of this volume—developed in different ways by Carens, Schuck, and Hammar, and in my own concluding essay—is that membership is a broader and more inclusive category than formal citizenship. In each of our six countries, there is a large and growing group of noncitizen members. What sort of membership status should these resident noncitizens enjoy?

There are two ways of approaching this tangled and complex question. One can focus on different types of membership. This approach asks what distinctions should be drawn between citizens and noncitizens, and between different categories of noncitizens. Alternatively, one can focus on different types of membership goods. One would then ask what sorts of goods should be reserved for citizens, and what sorts of goods should be made available to noncitizens as well. Consider each approach in turn.

**Types of membership.** The ideal of equality—more precisely, formal equality of status—is deeply rooted in the Western political tradition. With philosophical sources in Stoicism and Christianity, this ideal was elaborated by liberal political philosophers, propagated by the French Revolution, and gradually realized in practice over the 19th and 20th centuries. I noted above the central place of this ideal in our inherited understanding of nation-state membership; Peter Schuck discusses its importance in the American political tradition.

Given the strength of this egalitarian ideal, partial membership is always in need of special justification. It is always vulnerable to condemnation as second-class citizenship. To our modern egalitarian sensibility, partial membership is legitimate only if it is temporary. Partial membership may be a way station on the road to full membership; or it may accommodate temporary participants in our society who remain full members of another. Even ardent egalitarians would be willing to accept some kind of transitional status for permanent immigrants and some kind of temporary status for resident sojourners—persons whose attachments remain anchored elsewhere but whose residence and participation in the society distinguish them from short-term visitors such as tourists and business travelers.

If the principle of transitional or temporary partial membership is acceptable, why is the practice so problematic? The reason, I think, is that the social realities of partial membership do not correspond to the models just sketched. Millions of people in Europe and North America have been partial members for a decade or more. They are not—or not any more—the sort of temporary participants for whom partial membership is appropriate. And if they are on the road to full membership, the road is a long one indeed. By their own accounts, though, many do not seem to be on the road to citizenship at all. They seem likely to remain partial members for the indefinite future.

There are strong arguments, informed by the principle of equality, for extending to these long-term residents the rights enjoyed by full citizens. Yet as Peter Schuck points out, to carry this process of inclusion to its logical—or illogical—conclusion would erase the distinction between citizens and resident aliens and deprive the status of citizenship of any distinctive value or meaning. Given the importance of citizenship in the theory and practice of democratic nation-states, this would be deeply problematic. Indeed, fundamentalists argue that the process of inclusion has already been carried too far; they propose to restore value and meaning to citizenship by reserving a wider range of rights for citizens.

The ideal of equality and the ideal of citizenship are both deeply ingrained in the political culture of Western nation-states. The two ideals need not clash. Indeed citizenship is an inherently egalitarian ideal. It implies full legal and political equality among citizens. Yet the equality inherent in the idea of citizenship is a bounded equality. It is necessarily restricted to citizens. Full equality between citizens and noncitizens would render citizenship meaningless. For this reason, the ideal of citizenship may clash with the principle of equality. This makes the question of the extent to which long-term resident noncitizens ought to share in the rights of citizenship a difficult and deeply contested one. The tendency seems to be to extend many, even most of the rights of full membership to long-term resident aliens, while reserving certain core political rights and functions to citizens.

Another response to long-term partial membership is to encourage naturalization. This sounds innocuous enough, and it would seem to be less controversial than extending citizenship rights to noncitizens. But in practice it too is controversial. For one can promote the passage to full citizenship with a carrot or with a stick. One can liberalize access to citizenship, or one can make partial membership less attractive. The latter can be done by limiting the rights of partial members or by imposing new obligations on them (e.g., military service). At the limit, it can be done by requiring partial members to apply for naturalization or leave the country. 16

Partial membership for immigrants, then, too often becomes a final station rather than a way station on the road to full citizenship.
Partial membership for short-term sojourners poses a different set of problems. Should sojourners have the chance to become settlers? If so, which sojourners, and under what conditions? What provisions should be made for the passage from temporary to permanent membership?

These questions are difficult partly because the category of short-term sojourners is so heterogeneous. It includes all short- to medium-term residents whose attachments and interests remain centered in their country of origin, but who are in the process of creating a new set of attachments and interests.

One large group includes those who are resident in order to receive some kind of education or training. Even this category is quite heterogeneous, with the education varying from the general to the highly technical and the length of residence from a couple of months to several years. Persons resident for work or business represent an equally heterogeneous category, ranging from unskilled laborers to the international professional and corporate elite; for this group, too, stays may be measured in months or in years.

Can the state insist on a sharp distinction between immigrants and sojourners, keeping the latter in a strictly temporary status? Or must it grant them the opportunity to become permanent members? The question is by no means academic. Each of our six countries, wary of increasing "backdoor" immigration on the part of persons admitted for temporary stays, has taken steps in recent years to restrict passage from temporary to permanent status. When directed against tourists or persons on short-term business visits, such measures seem unobjectionable. But when directed against students or workers whose stays may span several years, they raise difficult questions.

These questions arise even when persons are admitted on the explicit understanding that they will eventually have to leave. When the U.S. Immigration and Naturalization Service recently announced that tens of thousands of nurses admitted on nonimmigrant H-1 visas would not be able to extend or renew their visas after six years, it was only confirming the explicit terms on which the visas had been issued. Yet the decision does seem troubling. The state was under no obligation, legal or moral, to admit the nurses in the first place. But having permitted them to work and live and form ties for six years, it may have acquired a moral obligation to let them remain.

The debate about seasonal worker programs pivots on similar questions. Seasonal workers permit states to meet certain manpower needs cheaply while externalizing various costs, including the cost of unemployment. Although the limitation of work and residence to a certain number of months per year is intended to hinder the formation of social ties and thus to prevent settlement, many seasonal workers—particularly those hired year after year—develop significant attachments to the country in which they work. It seems only fair that they be given the chance to graduate to permanent status.

What about students? Most countries discourage the settlement and naturalization of foreign students. One important rationale—since many of the students are from developing countries—is that this policy will hinder the brain drain from the third world to the first. This is surely a legitimate consideration, but what exactly justifies the differential treatment of workers and students? One could argue that, for equal periods of residence, work in a country creates a stronger claim to membership than study. Work—so the argument might run—makes a direct contribution to the wealth and welfare of a country, while study primarily prepares an individual for his or her own projects. But would this apply to all types of work? Does it apply equally to the executive of a multinational corporation and to the unskilled laborer? Or is there a sense in which the latter has special membership claims, perhaps because his or her presence in the territory is the result of what some analysts characterize as an "unequal exchange"? Certainly persons actively recruited by employers or the state to perform work shunned by citizens—as is the case for the nurses mentioned above—would seem to have especially strong membership claims.

Perhaps the only point on which wide agreement might be secured is one developed in this volume by Joseph Carens. Professor Carens argues that the claim to citizenship varies directly with the strength of social ties and thus, normally, with length of residence. One implication of this view is that whatever right the state might have to limit noncitizens' stays must be exercised sooner rather than later. It is not a right that can be reserved for eventual use whenever this might seem opportune. Failure to exercise it within a reasonable period leads to its expiration. State acquiescence in continued residence eventually creates an individual right to remain. This, by the way, is no mere philosopher's argument; the principle has been acknowledged by courts, among them the highest administrative court in West Germany.

Special problems of partial membership are raised by persons residing and working in the territory without the permission of the state. This question has dominated the politics of immigration and citizenship in the United States, and it has been important in France as well. To what extent should such persons be included in the benefits
of membership? In the United States, this is in part a constitutional question, resting on the interpretation of the 14th Amendment’s equal protection clause. It is on the basis of this clause, for example, that the Supreme Court ruled that undocumented immigrant children could not be excluded from the public schools. But it is more profoundly a political question. To what extent do their economic contribution, their de facto integration, and what Senator Simpson has called the “statutory encouragement to migrate illegally” (i.e., the absence of penalties on employers) give undocumented immigrants a claim to some form of membership? Most would probably agree that the prolonged government acquiescence in massive employment of undocumented immigrants gives these immigrants a stronger membership claim than those who entered the country after the imposition of employer sanctions (assuming that these are actually enforced).

The goods of membership. An important aspect of citizenship (and other forms of state-membership) is the access it provides, directly or indirectly, to a wide range of goods. These include such basic goods as public order, physical safety, and access to a labor market; the complex array of civil, political, social, and economic rights; and even intangibles such as a feeling of belonging or collective identity.

The enjoyment of some of these goods depends directly on membership status—on citizenship, permanent residence, or some other status. Other goods, though, do not depend directly on membership status, being available to all persons who happen to be present in the territory. The public peace, for example, may be enjoyed by those illegally or temporarily in the territory as well as by members. Yet even this good depends indirectly on membership, for only some form of membership can secure long-term residence and thus long-term enjoyment of the good.

From a global perspective, the most important basic goods today are public peace and access to a relatively promising labor market (one affording a reasonable chance of realizing personal or familial aspirations). Both goods depend at least indirectly on membership, and both goods are distributed among states in a highly unequal manner. It is this that accounts for the unprecedented migratory pressure and for the increasing salience and urgency of the politics of immigration and citizenship today.

What is it about the various membership-dependent goods that makes it reasonable to set different conditions of eligibility for them? What goods ought to be reserved for full citizens, and why? At the other end of the spectrum, what goods should be extended to all persons in the territory, regardless of membership?

Michael Walzer has suggested that shared understandings about the meaning of goods should guide policy deliberations about their distribution. The principle can be applied to the goods of membership. It is the different moral and political meanings of these goods, I think, that may explain why some are reserved for citizens, others extended to permanent residents, and others available to all without regard for membership.

To agree on this principle is simply to agree on a mode of argument. It does not, of course, settle any substantive questions of eligibility. Disagreement about the meaning of particular goods or about the implications of this meaning for eligibility is not only possible, it is inevitable. The following remarks are merely illustrative; I make no attempt to establish the meanings of different sorts of membership goods.

Consider voting. Even those who wish to extend to noncitizens most rights of citizenship often concede that there is something special about voting in national elections. The fact that national elections influence policy in the domains of defense and foreign affairs may justify reserving the right to vote in such elections to citizens, bound to the state by ties of allegiance and obligations of service. Voting in local elections, however, has a different meaning. It involves local self-administration, not high politics on the international scene. Questions of ultimate allegiance, it may be argued, are simply irrelevant to local voting. Thus voting rights in local elections have been granted to resident noncitizens in a number of European countries.

Or consider social benefits. Some derive their meaning and justification in reference to work: they are intended to replace lost income when a person is unable to work because of injury, involuntary unemployment, or old age. Such benefits are financed through employer and employee contributions. Worker's compensation, unemployment insurance, and social security are examples. Other social benefits have a different meaning. They are justified with reference to membership and financed out of general revenues. Family allowances, housing assistance, and income-supplement programs in general are examples. A third type of benefit is justified with respect to urgent need: this includes emergency medical care and emergency assistance generally.

The meanings of these goods have implications for eligibility. Most people would probably agree that anyone granted access to the
labor market, whatever his or her membership status, should qualify for such directly work-dependent benefits as worker’s compensation, unemployment insurance, and social security. Membership-independent eligibility for family allowances or housing assistance, however, is more controversial. This is because these latter could be understood as a form of mutual aid provided by members of a polity for one another. (“Members” might be interpreted restrictively to mean citizens only, or it might include permanent resident aliens as well.) The meaning of emergency assistance, finally, requires that it be extended to all persons in need, whatever their membership status. This includes illegal immigrants.

ABOUT THE ESSAYS

The essays in the first part of the book make arguments about the nature and meaning of citizenship and membership—arguments with definite, and sometimes surprising, policy implications. As I noted at the outset, these essays represent a wide range of viewpoints and are intended to challenge, not to reflect, the established consensus.

States are legally free to define their citizenry as they please, and to grant or deny naturalization as they see fit. But are they morally free to do so? According to Joseph Carens, they are not. States may not—without committing a moral wrong—deny citizenship to persons who are members of society. Membership, for Professor Carens, is not a legal category but a social fact—a fact created by living and working and establishing ties in a country. And this fact generates a moral right to citizenship.

As a social fact, membership develops gradually over time. It is therefore impossible to say with any precision when one becomes enough of a member to possess a moral right to citizenship. Some cases are nonetheless clear. That persons born and raised in a country are entitled to its citizenship is, according to Carens, beyond doubt. The same holds for persons born elsewhere but brought up from an early age in a country, whether their residence—or that of their parents—is legal or illegal. For it is residence, especially during crucial formative years, not birthplace, that engenders the social fact of membership. On the other hand, mere birth in a territory, without subsequent upbringing, does not make someone a member. The case of adult migrants, Carens admits, is more difficult; he suggests that five years’ residence should be sufficient to entitle one to citizenship.

What prerequisites may a state legitimately impose for naturalization? According to Carens, residence should be the decisive criterion. Modest linguistic competence might reasonably be required; Carens is agnostic on this point. But he is emphatic in rejecting any other tests of integration or assimilation. Membership should be measured by residence alone. Any other test risks making citizenship depend on an unacceptable way on social or cultural conformity.

The next two essays focus on particular cases. Peter Schuck writes about the United States, Kay Hailbronner about the Federal Republic of Germany. Both authors, though, also raise more general questions about citizenship and membership.

Does citizenship matter? Surprisingly little, according to Peter Schuck. Permanent resident aliens in the United States cannot vote, are ineligible for the federal civil service and for certain state public sector jobs, and can be deported (though the risk of deportation for any reason but serious criminality is quite small). And the immigration opportunities of family members of permanent resident aliens are more restricted than those of family members of citizens. Beyond this, permanent residents and citizens enjoy virtually identical rights. This leads Schuck to speak of the “devaluation of citizenship.”

Why does citizenship confer so few legal advantages? Professor Schuck’s answer focuses on the importance of the equal protection and due process principles in American constitutional law. But citizenship confers few advantages in each of our six countries. It is therefore especially appropriate that Schuck address the further question: should citizenship matter?

The devaluation of citizenship is not without its dangers. It may reduce the incentive for immigrants to join the community of citizens, and this in turn weakens democratic institutions. It may discourage certain immigrants from mastering the language and the social and political knowledge that are needed for their full integration into society. It may foster the development of an individualistic “entitlement mentality” at the expense of public-spiritedness. Finally, as citizenship recedes as a focus of loyalty and identification, other more parochial loyalties may take its place.

Yet Schuck is not, in the end, deeply disturbed by the eclipse of citizenship as a distinctive and central status. More fluid and variegated forms of membership are appropriate, he suggests, for a world as integrated across national boundaries as ours has become. More important, a loss from one point of view is a gain from another: the
devaluation of citizenship can be seen as an enhancement of liberal principles of inclusiveness and equality.

Like Peter Schuck, Kay Hailbronner uses an analysis of a particular country to formulate more general arguments about citizenship and nationhood. Professor Hailbronner highlights three distinctive characteristics of German citizenship law and naturalization practice: the exclusive reliance on jus sanguinis, or descent, for the attribution of citizenship at birth; the restrictive naturalization policy; and the insistence of the Federal Republic on a single German citizenship (rather than separate West and East German citizenships) as an expression of its commitment to the eventual reunification of Germany. As a result of these three characteristics, German citizenship law is markedly expansive towards ethnic Germans and markedly restrictive towards others. All three characteristics, Professor Hailbronner shows, can be understood only in the context of German history and traditions. Criticism of German naturalization practice on the grounds that it differs from that of the United States and Canada, according to Hailbronner, is fundamentally misplaced, since the Federal Republic of Germany is not and cannot become a country of immigration in the North American sense.

It might well be advisable, Hailbronner concedes, to rethink certain provisions of German citizenship law and naturalization practice in light of the settlement of millions of foreigners in the Federal Republic. But revisions of citizenship law and policy, he insists, must be undertaken for political, not moral reasons. Here he directly challenges the view of Joseph Carens. Moral arguments, according to Hailbronner, are out of place in discussions of citizenship. Every state has not only the right but the responsibility to make its citizenship law and policy conform to its national interests and to its own self-understanding as a nation. Cultural pluralism that might be appropriate in North America would not necessarily also be appropriate in continental Europe. In any event, it would be illusory, according to Hailbronner, to think of naturalization as a solution to the various problems of integration faced by foreigners in the Federal Republic of Germany.

Part One concludes with a discussion of dual citizenship by Tomas Hammar. Discussions of dual citizenship have generally been limited to legal specialists and concerned primarily with legal technicalities. Professor Hammar, while well aware of the legal issues, focuses on the deeper political questions raised by dual citizenship. The intensifying and increasingly politicized debate about dual citizenship in Sweden, Germany, and France makes his contribution an especially timely one.

Despite international efforts to limit its frequency, dual citizenship is increasingly common in each of our six countries. Hammar shows why this increase has occurred, and why it can be expected to continue. He then traces the contours of the emerging debate about dual citizenship. The debate is a complex one because it proceeds on different levels, corresponding to the legal, political, cultural, and psychological dimensions of citizenship, and because citizenship is understood in different ways in different countries.

Tomas Hammar recognizes the problems and complications that dual citizenship can cause. These problems, though, are generally not intractable ones. And dual citizenship has its advantages as well. It can be seen as an appropriate legal expression of the dual social and cultural identifications of many first- and second-generation immigrants in Europe and North America. And greater tolerance of dual citizenship might substantially increase naturalization rates in countries such as Sweden and especially Germany, which now require most candidates for naturalization to renounce their previous citizenship.

The essays in the second part of the book give a comparative overview of citizenship and membership policies, beginning with my own discussion of citizenship law and naturalization practice. These vary widely from country to country, reflecting different historical experiences. In the United States and Canada, naturalization is easy and expected, and citizenship is conferred on all persons born in the territory. In Sweden and Germany, citizenship is based on descent. Birth in the territory does not confer citizenship, so immigrants and their children can acquire citizenship only through naturalization—easily in Sweden, with considerable difficulty in Germany. France and the United Kingdom have mixed systems of citizenship law, based on birth in the territory and on descent, and reflecting in complicated ways their history as colonial powers.

What are the consequences of these different systems of citizenship law for immigrants and their descendants? Naturalization rates vary tremendously—Canada's is more than 20 times higher than that of Germany. Considering naturalization together with other ways of acquiring citizenship, I bring together data showing that Canada has gone furthest in transforming its citizens into immigrants, followed closely by the United States and Sweden, and more distantly by France, with Germany trailing the others by a large margin. (Britain is a special case and cannot be directly compared with the other countries.)

Citizenship and naturalization have recently become intensely
Introduction

contested issues in Europe and North America. Within the last 15 years, France, Britain, Belgium, the Netherlands, and Canada have all undertaken major revisions of their citizenship laws. Debates are currently most vigorous in Germany, where extremely low naturalization rates are a matter of increasing awareness and concern, and in France, where a proposal to restrict immigrants' access to citizenship has been one of the leading themes of Le Pen's National Front. I conclude my essay by sketching the main lines of debate in these and other countries.

The last two essays examine the situation of the large and growing group of noncitizen members of European and North American societies. These are the persons that Tomas Hammar terms "denizens"—those whose prolonged sojourn, secure residence status, and extensive rights compel us to consider them members of state and society despite their lack of formal citizenship.

Mark Miller examines noncitizens' patterns of political participation. Only citizens, of course, enjoy full political rights, although voting rights in local elections have been granted to foreigners in several European countries, including Sweden. But inability to vote in national elections does not mean that foreigners are barred from all forms of political participation. Professor Miller distinguishes five types of political activities and institutions in which foreigners can participate and through which their interests receive some sort of representation. Participation and representation can be channeled through (1) homeland organizations; (2) advisory consultative bodies designed to represent foreigners' interests on the local or national level; (3) unions and workplace councils; (4) political parties or religious and civic organizations; and (5) demonstrations, wildcat strikes, street protests, and the like.

These forms of extra-electoral participation are most highly developed in Continental Europe, particularly in France and Germany, which have the largest groups of long-term resident noncitizens. In the other countries, where most immigrants are or will become citizens, immigrants' patterns of political participation are not organized around citizenship status, but rather, as in Canada, the United States, and, to a lesser extent, Britain, along ethnic lines.

Miller's analysis reminds us that the political legacy of the postwar immigration is a complex and difficult one, especially in Europe, which lacks the political culture and political institutions that facilitate the political integration of immigrants in traditional countries of immigration. Immigration has created new webs of transnational politics:

increasingly, countries of immigration are exposed to the "spillover" of political disputes—even political violence—from countries of emigration. Nor is political integration guaranteed by the purely formal transformation of immigrants into citizens; Miller notes the low registration and voting rates of citizens of immigrant origin in France, Britain, and elsewhere.

Despite noncitizens' various opportunities for political participation, citizenship remains a crucial political status. The exclusion or self-exclusion of immigrants from citizenship leaves a significant fraction of the population disenfranchised; and the interests of disenfranchised groups do not count for much in the democratic political process. But how much does citizenship matter outside the political sphere? I address this question in the concluding essay on the economic and social rights of noncitizens.

The main line of division, in each of our countries, is not between citizens and noncitizens, but between denizens and other foreigners. Denizens are those foreigners with an ordinarily nonrevocable right of permanent residence. They are free to take any job they wish (except certain public-sector jobs) or to go into business for themselves. And, with a few exceptions, they are eligible for social benefits on the same terms as citizens. Other foreigners lack the secure residence status, the free access to the labor market, and the eligibility for the full range of social benefits that denizens enjoy.

Denizens, unlike other foreigners, are definitely members of the nation-states in which they reside. Yet they are not full members. A dual membership structure has emerged, based on the distinction between political rights and socioeconomic rights. Citizens enjoy both in full measure; denizens enjoy only the latter. As their length of residence increases, denizens' exclusion (or self-exclusion) from the political community becomes less and less acceptable.

Citizenship is no panacea. The possession of political rights does not guarantee their effective exercise; still less does it guarantee the real social and economic integration of immigrants. Still, a democratic state cannot allow a significant fraction of its population to remain indefinitely outside the political community. It must seek to transform its long-settled immigrants into citizens. This will be a major challenge of the next decade in Europe and North America.