



TRANSATLANTIC PERSPECTIVES ON CITIZENSHIP AND DIVERSITY: AN INTRODUCTION

Anke Patzelt¹ and Elke Winter²
University of Ottawa

While the movement of people is not new, international migration is gaining more importance in today's globalized world. New and faster means of communication and transportation connect people around the world in completely new ways. Ever increasing numbers of people are leaving their home countries and moving to foreign destinations to escape from hunger, persecution, war or environmental catastrophes; they migrate to seek a better life, find employment, study, enhance their careers or life styles, or to join a partner or family members who already live abroad. With increasing numbers of people being internationally mobile, ethnocultural diversity, integration, as well as (lived and formal) citizenship have become some of the most important topics in scholarship and policymaking alike. While it used to be popular to differentiate between Europe's "traditional nation-states" and the "settler societies" of the New World (Milich and Peck 1998), over the past years, scholars have noticed a convergence of immigration and citizenship policies on both sides of the Atlantic (Dauvergne 2016; Joppke 2007; Joppke 2010; Triadafilopoulos 2012). According to one commentator, this development has even led to the "end" of settler societies (Dauvergne 2016). In what follows, we briefly survey the literature that supports the claim that the countries on both sides of the Atlantic are moving closer together in their treatment of immigration, diversity and citizenship (convergence theory). We then circumscribe the goals and caveats inherent to conducting transatlantic comparisons. Finally, we provide an overview of the contributions to this special issue.

Scholars examining immigration and citizenship policies in Western democratic states on both sides of the Atlantic often refer to Germany and Canada. These two countries tend to be portrayed as being located at opposing poles of the definitions of nationhood and, thus, of immigration, integration, and citizenship policies (Bauder 2011; Brubaker 1989). Existing differences notwithstanding, scholars like Triadafilopoulos (2012), Winter (2014), Schmidtke (2014), and Kolb (2014) underline the increasing convergence of both countries' immigration, citizenship and integration policies. Triadafilopoulos (2012), for example, holds that despite different national histories and approaches to migration, Canada and Germany have come to address questions of immigration and membership in strikingly similar – and increasingly multicultural – ways. This may be due to the fact that the migration and integration management in both countries, while being caused by different circumstances, has increasingly shifted to

¹ Anke Patzelt is a Ph.D. student in Sociology at the University of Ottawa

² Elke Winter is Associate Professor of Sociology at the University of Ottawa, and research director at the Centre for Interdisciplinary Research on Citizenship and Minorities (CIRCEM).

subnational levels. According to Schmidtke (2014), new initiatives and projects in the field of integration are increasingly initiated at the regional and local level (regions, municipalities, cities, and civil society engagement). Additionally, Winter (2014, 29) maintains that the debates surrounding two “of the most controversial citizenship legislation[s]” in both countries, namely the “*Optionspflicht* [the duty to choose] in Germany and the ‘first generation limitation’ in Canada ... seem to be more driven by political *conjuncture* – be it party ideology, electoral considerations, or the global fear about all things (rightly or wrongly) associated with Islam – than with ancient traditions of nationhood” (Winter 2014, 48). Finally, there are also increasing similarities between Germany’s and Canada’s labor migration policies, especially with regard to highly skilled workers. Canada recently introduced changes to its point system which make it harder to enter the country, e.g. applicants “must now prove a job offer or job experience in a specific, state-defined shortage occupation” and “a minimum language requirement” (Kolb 2014, 63). Germany, by contrast, makes it increasingly easier for highly skilled migrants to enter the country, e.g. by introducing the German Green Card and the European Blue Card, as well as by introducing the option for “a residence permit for job searching” (Kolb 2014, 63–66). Additional manifestations of the ongoing immigration/citizenship policy convergence between Germany and Canada will also be examined further below (see the contributions of Schultz and Weinmann in this issue).

While the studies above concentrate on Germany and Canada, scholars such as Joppke (2010) and Dauvergne (2016) argue that this convergence is not limited to a few countries. Rather, they see policy convergence as being embedded in a phenomenon that stretches over most parts of the Western world, including all settler societies of the New World, i.e. the United States, Canada, Australia and New Zealand, as well as the prosperous countries of Western Europe. Specifically, Joppke (2010, vii) observes the development towards “a liberal mode of inclusive citizenship with diminished rights implications and increasingly universalistic identities.”

Dauvergne (2016, 2), in her recent book³, goes even further. She argues that the convergence of migration politics in the “global North” has led, on the one hand, to the end of “the era of settler societies,” and, on the other hand, to the emergence of “a new, mean-spirited politics of immigration” of global dimensions. Three main factors are said to have caused this development, namely “the crisis of asylum,” “the fear of Islamic fundamentalism,” and “the end of multiculturalism”⁴ (Dauvergne 2016, 7). According to Dauvergne, due to these three factors, the traditional settler societies have lost the importance of two of their defining characteristics, which she identifies as “settlement” and “society”. The loss of permanent settlement as a defining characteristic of these countries’ immigration policies is best documented in the increasing “preference for temporary migration programs” promoted by settler states, as well as, more generally, the “decrease in ‘permanent’ migration numbers” in these countries (Dauvergne 2016, 124). The loss of a cohesive and comprehensive society, by contrast, is deduced by the author from the rise of “ethnic enclaves and illegal migration,” two phenomena which are said to result in the exclusion not only of newcomers but also of ethnicized or racialized individuals who have been living in a country for a long time (Dauvergne 2016, 134). As a consequence, the meaning of “immigration” in settler societies has been undermined. As Dauvergne (2016, 2) formulates it: “[t]here is no longer any basis, other than history, for saying that settler societies are different in regard to migration than other Western liberal democracies.” These changes, together with changes that have taken place in Europe, e.g. the end of colonial linkages for many of the Western European states, are said to have led to a new direction in the politics of migration which now “is grounded in sharp distinctions between sought-after highly mobile individuals on the one hand, and illegal migrants on the other” (Dauvergne 2016, 8).

³ Dauvergne, Catherine. *The New Politics of Immigration and the End of Settler Societies*. 2016

⁴ For a slightly different argument, see Joppke (2017), who argues that while there is a demise of multiculturalism in the political sphere, its ideas persist in liberal societies, although more at the individual than at the group level.

In light of the situation, both the traditional settler societies and the prosperous nation-states of Western Europe fall back to “well-trying” policies to cope with new situations. As countries try to implement the strategies that have proven successful elsewhere, the aims and implementations of their migration policies become more and more alike. This is reflected both in immigration policies, as well as in policies concerning citizenship and integration (Dauvergne 2016). In addition, Dauvergne (2016, 2) observes that much of the vocabulary and theory we use to study citizenship and diversity on both sides of the Atlantic is outdated. Scholars are thereby adding to a “policy paralysis” or, at least, are not helping to overcome the latter. Hence, it seems like we are currently experiencing a certain “impasse” in the field of comparative migration and citizenship studies. To help overcome this scholarly impasse and to stimulate fruitful learning from transnational comparison are two of the goals of this special issue. We hope that this will then also inspire new paths and ideas in policy.

At a time when states are desperately trying to reorient their migration policies, comparative migration research has an important role to play. Its goal “is to examine how structures, cultures, processes, norms, or institutions affect outcomes through the combination and intersection of causal mechanisms” (Bloemraad 2013, 28). Comparative immigration and citizenship research also allows us to “challenge conventional wisdom or show how existing academic theories might be wrong” (Bloemraad 2013, 29). Consequently, it allows for the exploration and comparison of new developments and trends in different countries with respect to the management of migration, ethnocultural diversity and citizenship. Questions pertaining to the extent to which states open their doors for (which type of) migrants, and to how national sovereignty and solidarity are repositioned vis-à-vis increasing diversity and globalization are at the heart of this comparative endeavor, and thus also at the core of this special issue. Said differently, many of the contributions to this special issue examine how various actors – governments, states, social movements, and migrants – negotiate processes of ethnic boundary (un-)making (Wimmer 2013). Particularly, the articles presented here examine policies and practices of citizenship in Germany and other member states of the European Union against the backdrop of recent developments in the Canadian context.

The first paper by **Thomas Faist and Christian Ulbricht** examines the social integration of immigrants in Germany in terms of “communal relationships” (*Vergemeinschaftung*) and “sociation” or “associative relationships” (*Vergesellschaftung*). While the first part of the paper discusses the theoretical foundations of the argument, the second part examines German citizenship reforms since 2000 in light of this approach. As such, the paper does not only provides insight into recent changes in citizenship policies in Germany, but also offers a fruitful theoretical foundation for more successfully analyzing immigrant incorporation, as well as debates around migration in Germany and in other liberal nation-states. The authors insist that issues of migration and integration were hotly debated in Germany over the past few years. Within these debates, one prominent claim was to “de-culturalize” topics relating to migration and integration and to frame these issues in terms of participation rather than integration. However, as the authors convincingly argue, participation, which is defined along the lines of “associative relationships”, alone is not enough to ensure the successful integration or incorporation of immigrants. Processes of “communal relationships”, which represent the more emotional components of incorporation, such as feelings of belonging, are at play in settlement processes and need to be considered. Thus, the authors conclude that it is only by analyzing both the processes of “communal relationships” and “associative relationships” that the integration processes of immigrants can be understood and evaluated. Furthermore, it is only by combining these two concepts that it becomes possible to fully understand the ways in which important institutions such as citizenship and welfare states function and execute their power.

Maria Jakob’s paper continues this line of inquisition. The author investigates the question of how cultural belonging is promoted at newly introduced citizenship ceremonies in Germany. Placed in the broader discussion of citizenship reforms since the 2000s, the paper investigates what it means to be a German citizen. Specifically, the paper asks whether the representations of culture produced and mobilized at citizenship ceremonies can be interpreted as a form of liberal assimilation or rather can be

seen as a revival of the old idea that Germany is a “Kulturation,” a cultural nation. To this end, the paper focuses on the connection between culture, citizenship, and national belonging. To analyze the nexus between these three terms, the author’s analysis draws on 95 speeches from citizenship ceremonies in different parts of Germany, as well as on participant observations at 14 ceremonies. This rich empirical material makes it possible to gain an in-depth view into the mechanisms and actors at play in citizenship ceremonies. It also allows for an in-depth analysis of the ways in which cultural belonging is promoted at these events. The author highlights two specific ways in which culture is conceptualized at the ceremonies: firstly, as a universal feature that has a unifying impact on people, and secondly, as a folkloristic asset that individuals can use to promote diversity. Jakob argues that this dual dimension of culture serves as a “modern solution” to problems of social integration. She concludes that this way of dealing with cultural belonging can be seen as an adaptation of the traditional concept of “Kulturation” to new social contexts.

While most of the papers in this special issue either discuss issues of citizenship and diversity in Germany, Canada or both countries, **Eriselda Shkopi’s and Zana Vathi’s** paper presents a case study of Albanian migrants in the Italian city of Padua, a group that is typically heavily stigmatized in Italy. The authors examine the importance of naturalization for these migrants’ political integration. They also analyze how factors such as the age and educational background impact immigrants’ political engagement and participation, an aspect of migrant’s political integration which so far has only received limited attention. The case study is well embedded in the broader discussion around citizenship and integration in Italy specifically, and research on the political integration of immigrants more generally. The analysis is based on 30 interviews, out of which 20 were conducted with naturalized Albanians in Padua and ten with key actors in politics and community activities from different cities across Italy. It concentrates on the motivations and meanings lying behind the political integration of this population. By comparing the situation and the feelings that the interviewees had before and after naturalization, the paper demonstrates the importance of the passage from “merely being a permanent resident” to “becoming a full member of society through naturalization” for the immigrants’ political engagement. Thus, naturalization, which entails full voting rights and representation at all levels, is seen as a prerequisite for the political integration of this group. However, interestingly, the authors also highlight that for the youngest and most well-educated of their interviewees, political participation is not necessarily attached to the formal acquisition of citizenship. This shows that political integration is not necessarily dependent on formal citizenship, but also involves variables such as age and socio-economic status.

Catherine Frost’s and Elke Winter’s paper examines what kind of knowledge is called upon in distinguishing insiders from outsiders within naturalization and passport acquisition in Canada. The authors suggest that bureaucratic requirements and procedures involved in these two processes are revealing in that seemingly innocuous knowledge about citizenship serves to sort outsiders from insiders, endorses specific behaviors over others, and empowers the state to redefine political membership. The paper identifies two major forms of knowledge that are involved in sorting insiders from outsiders in the two processes: On the one hand, *mechanical knowledge*, which “involves tests and evaluations driven by document-matching, biometrics and fact-checking exercises” and, on the other hand, *moral knowledge*, which refers to an interpersonal dimension and is defined as “the kind of lives we live among our peers and our intentions towards the political community.” The authors find that, in the Canadian case, tensions exist between both kinds of knowledge. The state increasingly aspires to know the citizen “mechanically”, yet encounters limitations that require some form of “moral knowledge” to secure the validity of both bureaucratic procedures.

Ivana Previsic’s paper discusses the ban of face coverings at citizenship ceremonies that was issued under the Conservative government of Canada in 2011. The ban, which has since been revoked, provoked major debates both in the political sphere as well as in Canadian media and civil society. The ban is here examined from the perspective of gender (in)equality. Based on a qualitative content analysis of

mainstream media articles, the author investigates how different commentators – both Muslim and non-Muslim ones – used the notion of gender equality “to argue their positions and conceptualize the meaning of Canadian citizenship.” By analyzing the comments of Muslim and non-Muslim readers, the paper presents “both sides of the story.” The author demonstrates that both audiences entertain a neoliberal understanding of gender (in)equality. However, most non-Muslim commentators interpret the wearing of the veil as practices of gender inequality, which they claim exists only among Muslims. In contrast, Muslim commentators tended to identify the wearing of the veil as a free individual choice by women and projected gender inequalities onto Western societies.

Caroline Schultz’s paper compares how Canada and Germany statistically measure the diversity of their populations. She argues that despite existing differences, the statistical approaches of both countries are converging “towards a new pragmatism.” This finding is striking, as Canada and Germany are often described as “antipods” in terms of their understanding of nationhood, as well as in their approaches toward immigration, citizenship, and integration. Both countries’ strategies to statistically measure ethnic subgroups also differ significantly: Canada explicitly asks questions about the “origins” of individuals and relies on self-identification. Germany, by contrast, derives this information based on formal citizenship and place of birth. However, by embedding an historical overview of how both countries statistically measure diversity in an ideology-pragmatism continuum – where ideologically driven approaches are characterized by their close relation “to the respective idea or myth of nationhood” and pragmatic driven approaches by their consideration to efficiently measure integration – the author offers a compelling argument. Specifically drawing upon the categories of “visible minority” in Canada and “migration background” in Germany, the paper concludes that the introduction of both categories can be seen as a shift towards a pragmatic approach of measuring diversity, as both of these categories were developed to track the impacts of integration and “counteract discrimination and inequalities.”

Finally, **Martin Weinmanns’** paper discusses the similarities and differences between two legal clauses: Section 3(3) of the Canadian Citizenship Act, also known as the First Generation Limitation Clause and Section 4(4) of the German Citizenship Act, two “regulations that delimit the acquisition of citizenship abroad.” The First Generation Limitation Clause, was implemented in 2009 and prevents the passing of Canadian citizenship from the second generation born abroad onwards. In Germany, Section 4(4) likewise prevents the automatic acquisition of German citizenship for the second generation born abroad. While the focus of migration and citizenship studies is often placed on the process of immigration and, thus, acquiring citizenship, research on the processes of emigration, as well as on external citizens and their rights is on the rise. This paper fits perfectly into this stream of research, using a contextual description to make “an initial normative assessment” which can be used as a starting point for further research on this topic. Throughout the paper, each regulation is placed in their respective legal and historic context, and their specific features as well as their differences are analyzed against this background. They are also analyzed in relation to the notion of *ius connexio*, the connection one has to a country. In fact, Weinmann concludes by arguing that, from a normative perspective, *ius connexio* should be the determining factor for citizenship acquisition of generations born abroad. To put this into policy he recommends the introduction of requirements similar to those for naturalization (e.g. language and knowledge tests), to determine whether citizenship can be retained in the second or subsequent generations.

Taken together, the papers in this special issue offer a better understanding of new developments in diversity management, as well as in citizenship policies and practices on both sides of the Atlantic. The recent case studies from Canada, Germany and Italy underline the usefulness of comparative migration and citizenship studies. They help stimulate a new debate, which, we hope, will ultimately lead to overcoming the “policy paralysis” in European nation-states and settler societies that some commentators are observing.

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Contact:

Carleton University
The Centre for European Studies
1103 Dunton Tower
1125 Colonel By Drive
Ottawa, ON K1S 5B6
Canada

Tel: +01 613 520-2600 ext. 3117; E-mail: rera-journal@carleton.ca

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