CITIZENSHIP AND NATIONHOOD IN FRANCE AND GERMANY

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Introduction

Traditions of Nationhood in France and Germany

For two centuries, locked together in a fateful position at the center of state- and nation-building in Europe, France and Germany have been constructing, elaborating, and furnishing to other states distinctive, even antagonistic models of nationhood and national self-understanding. In the French tradition, the nation has been conceived in relation to the institutional and territorial frame of the state. Revolutionary and Republican definitions of nationhood and citizenship—unitarist, universalist, and secular—reinforced what was already in the ancien régime an essentially political understanding of nationhood. Yet while French nationhood is constituted by political unity, it is centrally expressed in the striving for cultural unity. Political inclusion has entailed cultural assimilation, for regional cultural minorities and immigrants alike.

If the French understanding of nationhood has been state-centered and assimilationist, the German understanding has been Volk-centered and differentialist. Since national feeling developed before the nation-state, the German idea of the nation was not originally political, nor was it linked to the abstract idea of citizenship. This prepolitical 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 an irreducibly particular Volksgemeinschaft. On this understanding, nationhood is an ethnocultural, not a political fact.

Comparisons between German and French understandings of nationhood go back, in their basic lines, to the early nineteenth century. They were first formulated by German intellectuals, who sought to distance themselves from the allegedly shallow rationalism and cosmopolitanism of the Enlightenment and the French Revolution through an historicist celebration of cultural particularism. Mid-nineteenth-century French intellectuals reversed the evaluative signs but preserved the substance of
the comparison, celebrating the crusading universalism of the French national tradition. Thus Michelet apostrophized France as a "glorious mother who is not ours alone and who must deliver every nation to liberty!" New and more sharply antagonistic formulations were elicited by the Franco-Prussian War, particularly by the question of Alsace-Lorraine. While German scholars advanced an objectivist, ethnocultural claim to Alsace-Lorraine, based on the facts of language (in Treitschke's extreme version, the facts of "nature"), French intellectuals countered with a subjectivist, political argument emphasizing the will of the inhabitants. The French view found sublimated expression in the celebrated lecture of Ernest Renan, "Qu'est-ce qu'une nation?," the German view in Friedrich Nietzsche's magisterial *Weltbürger und Nationalstaat*. More detached comparative formulations have been provided by Hans Kohn, Theodor Schieder, Jenő Szűcs, Anthony Smith, and others.2

In recent years, however, bipolar contrasts involving Germany, especially those pointing to a German "Sonderweg" (special road) to the modern world, have been much criticized. Such accounts, it is argued, measure German developments, minutely scrutinized for faults (in the geological and the moral sense) that might help explain the catastrophe of 1933–45, against an idealized version of "Western," that is, British, French, or American developments. Only through the doubly distorting lens of such culpabilization on the one hand and idealization on the other, the argument continues, does the nineteenth-century German bourgeoisie appear "supine" next to its "heroic" French counterpart, the German party system deeply flawed by English standards, the "German conception of freedom" dangerously illiberal by comparison with the Anglo-American, German political culture fatally authoritarian in comparison with that of the "West" in general.

Comparisons of German and French conceptions of nationhood and forms of nationalism have not escaped indictment on this count.4 The indictment is not without foundation. The temptation to treat differences of degree as differences of kind, differences of contextual expression as differences of inner principle, is endemic to bipolar comparison; it is heightened when the field of comparison is as historically and ideologically charged as it is here. To characterize French and German traditions of citizenship and nationhood in terms of such ready-made conceptual pairs as universalism and particularism, cosmopolitanism and ethnocentrism, Enlightenment rationalism and Romantic irrationalism, is to pass from characterization to caricature.

Yet if formulated in more nuanced fashion, the opposition between the French and German understandings of nationhood and forms of nationalism remains indispensable. I aim here to recover the analytical and explanatory potency of this distinction, by rescuing it from the status of the routine and complacent formula, ripe for criticism, that it had become. For the distinctive and deeply rooted French and German understandings of nationhood have remained surprisingly robust. Nowhere is this more striking than in the policies and politics of citizenship vis-à-vis immigrants. Even as Western Europe moves toward closer economic union, and perhaps towards political union, citizenship remains a bastion of national sovereignty. Even as the European Community, anticipating great migratory waves from the south and the east, seeks to establish a common immigration policy, definitions of citizenship continue to reflect deeply rooted understandings of nationhood. The state-centered, assimilationist understanding of nationhood in France is embodied and expressed in an expansive definition of citizenship, one that automatically transforms second-generation immigrants into citizens, assimilating them—legally—to other French men and women. The ethnocultural, differentialist understanding of nationhood in Germany is embodied and expressed in a definition of citizenship that is remarkably open to ethnic German immigrants from Eastern Europe and the Soviet Union, but remarkably closed to non-German immigrants.

State-Building and the Geography of Nationhood

The French nation-state was the product of centuries of state-building, and of the gradual development of national consciousness within the spatial and institutional frame of the developing territorial state. The nation-state forged by Bismarck was also heir to long traditions of state-building and national consciousness, but the two traditions—one Prussian, one German—were radically distinct in territorial frame, social base, and political inspiration. The Prussian state tradition was not only subnational and, after the partitions of Poland, supranational, it was also in principle antinational; while German national consciousness developed outside and—when national consciousness became politicized—against the territorial and institutional frame of existing German states.

This is not to say that national consciousness had no political or institutional mooring in Germany. The medieval and early modern Empire—the Holy Roman Empire of the German Nation, as it came to be called, not without ambiguity, in the sixteenth century—was the
institutional incubator of German national consciousness, analogous in this respect to the Capetian monarchy in France. But while nation and kingdom were conceptually fused in France, nation and supranational Empire were sharply distinct in Germany. And while the early consolidation and progressively increasing "stateness" of the French monarchy gradually formed and strengthened national consciousness, the Holy Roman Empire lost the attributes of statehood in the thirteenth century. Although it survived, with its increasingly rickety institutions, into the nineteenth century, it lacked the integrative power of a centralizing bureaucratic administration and failed to shape a firmly state-anchored national consciousness. German national consciousness was never purely cultural, purely apolitical; yet while it was linked to the memory and to the anticipation of effective political organization, it was for six centuries divorced from the reality. In France, then, a bureaucratic monarchy engendered a political and territorial conception of nationhood; while in Germany, the disparity in scale between supranational Empire and the subnational profusion of sovereign and semisovereign political units fostered the development of an ethnocultural understanding of nationhood.

The wider reach of territorial state-building in France than in Germany in turn reflects a deep difference in economic, cultural, and political geography between what Stein Rokkan and Derek Urwin have called monocephalic and polycephalic zones of Europe. Polycephalic Europe, a legacy of medieval overland trade patterns, consists of the broad north-south belt of closely spaced cities stretching from Italy to the North Sea and the Baltic, and running through the heart of western Germany. Here the density of cities and ecclesiastical principalities inhibited the early consolidation and expansion of territorial states. Large territorial states developed earlier on the fringes of this city belt, where contending centers (such as the Ile de France) faced less competition and enjoyed more room for expansion. 6

The scale of political authority in early modern Central Europe, then, made it impossible to identify the German nation with the institutional and territorial frame of a state. In Germany the "conceived order" or "imagined community" of nationhood and the institutional realities of statehood were sharply distinct; in France they were fused. 7 In Germany nationhood was an ethnocultural fact; in France it was a political fact.

I am not suggesting that the sense of membership or "identity" was primarily ethnocultural in medieval or early modern Germany. To the extent that anachronistic talk of "identity" makes sense at all, the subjective "identity" of the vast majority of the population throughout Europe was no doubt largely local on the one hand and religious on the other until at least the end of the eighteenth century. For most inhabitants local and regional identities continued to be more salient than national identity until late in the nineteenth century. The point is a structural, not a social-psychological one. The political and cultural geography of Central Europe made it possible to conceive of an ethnocultural Germany coinciding neither with the supranational pretensions of the Empire nor with the subnational reach of effective political authority. It was much more difficult to distinguish nation and state, and therefore to imagine a specifically ethnocultural nation, in France.

A second, closely related difference in patterns of national self-understanding is also rooted in political and cultural geography. The French understanding of nationhood has been assimilationist, the German understanding "differentialist." The gradual formation of the nation-state around a single political and cultural center in France was the historical matrix for an assimilationist self-understanding, while the conglomerative pattern of state-building in polycentric, biconfessional, even (in Prussia) binational Germany was the historical matrix for a more differentialist self-understanding. 10 The vehicle for the concentric, assimilative expansion of nationhood in France was the gradually increasing penetration into the periphery of the instruments and networks of the central state (school, army, administration, and networks of transportation and communication). 11 In Germany, Prussia most closely approximates this model of the assimilationist state-nation. Yet it was the geopolitical fate of Prussia to become, in the late eighteenth century, a binational state; and Prussia failed to assimilate its large Polish population. 12 The French state did not fully assimilate Bretons, Basques, Corsicans, and Alsatians, but its failure was neither so complete, so evident by the turn of the century, nor so consequential for national self-understanding.

The ethnocultural frontier between Germans and Slavs, not only in eastern Prussia but throughout the zone of mixed settlement in East Central Europe, has been basic to German self-understanding. This frontier has no parallel in the French case. 13 Massive eastward migration of Germans in the high middle ages and again in the early modern period had created numerous pockets of German settlement in Slavic lands. Much assimilation in both directions occurred in these borderlands over the centuries. Yet the decisive fact for national self-understanding was the assimilation that did not occur. 14 The preservation of
German language, culture, and national identity over centuries in enclaves and outposts in the Slavic east and the preservation of Polish language, culture, and national identity in eastern Prussia furnished to the German elite a differentialist, bounded model of nationhood, a feeling for the tenacious maintenance of distinctive ethnonational identities in zones of ethnoculturally mixed populations. Germany defined itself as a frontier state, with reference to the German-Slav borderlands, in a way that has no parallel in France.

The Revolutionary Crystallization

The opposition between French and German understandings of nationhood, while rooted in political and cultural geography, was fixed decisively by the French Revolution and its aftermath. The idea of nationhood was first given self-conscious theoretical elaboration in the second half of the eighteenth century. In France, reformist philosophes and the urban public opposed the nation to the privileged orders and corporations of the ancien régime, giving the concept of nationhood a critical edge and a new, dynamic political significance. The *cahiers de doléance*, moreover, suggest that a high political charge was attached to the idea of the nation by the population at large in the immediately pre-Revolutionary period.\(^{15}\) Coinciding with the politicization of nationhood in pre-Revolutionary France, however, was its unprecedented depoliticization in late-eighteenth-century Germany. In the writings of the flourishing *Bildungsbürgertum*\(^{16}\) of the epoch the German nation was conceived less and less frequently in the traditional political context of the Empire and more and more frequently as an apolitical, ethnocultural entity—an "inward Empire," as Schiller put it in 1801, when the old Empire had entered its final phase of disintegration, or a *Kulturban*, in the later formulation of Friedrich Meinecke.\(^{17}\) If this *bildungsbürgerlich* understanding of nationhood was never exclusively cultural, its political dimension was nonetheless in deep recess during the late eighteenth and the first years of the nineteenth century.\(^{18}\) Elaboration of the idea of nationhood in the second half of the eighteenth century in France and Germany, then, was the work of a broad bourgeois stratum in France and of a narrower, purely literary stratum in Germany. More important, it was oriented to the reform of an existing nationwide state in France but was identified with a purely cultural, indeed a specifically literary national spirit (*Nationalgeist*) in Germany.

When reform failed in France, the radicalized Third Estate constituted itself as the National Assembly and proclaimed the sovereignty of the nation.\(^{19}\) Membership of this sovereign nation was conceived in political, not ethnocultural terms. Thus Sieyès: "What is a nation? A body of associates living under a common law and represented by the same legislature."\(^{20}\) The dominance of citizenship over nationality, of political over ethnocultural conceptions of nationhood, is perhaps best expressed in Tallien's remark of the spring of 1795: "the only foreigners in France are the bad citizens."\(^{21}\) Qualifications for membership were much disputed during the revolutionary epoch, but such disputes turned on a political rather than an ethnocultural axis.

So too did the question of the territorial boundaries of the new nation-state. The principle of self-determination, pregnant with immense disruptive potential for a dynastically organized and ethnoculturally intermixed Europe, was invoked to justify the territorial gains of 1791–1793, and even to reinterpret retrospectively the terms of the accession of Alsace to France in the seventeenth century.\(^{22}\) But the collective "self" entitled by revolutionary doctrine to self-determination was conceived in the cosmopolitan, rationalistic terms characteristic of the eighteenth, not in the Romantic terms characteristic of the nineteenth century.\(^{23}\) The point of self-determination as understood by the revolutionaries was to give expression to the universal desire for liberty and thus—how could it be otherwise?—for incorporation into France. It was emphatically not to permit the projection of ethnocultural identity onto the political plane.

Even the briefly if radically assimilationist linguistic politics of the Revolution was determined by political considerations rather than by a conception of the nation as an ethnolinguistic entity. Linguistic variety was denounced as conducive to reaction, linguistic unity advocated as indispensable to Republican citizenship. Thus Barère's report to the Committee of Public Safety in January 1794: "Federalism and superstition speak low Breton; emigration and hatred of the Republic speak German; the counterrevolution speaks Italian, and fanaticism speaks Basque." Only when all citizens speak the same language, according to Abbé Grégoire's "Rapport sur la nécessité et les moyens d'anéantir les patois et d'universaliser l'usage de la langue française," can all citizens "communicate their thoughts without hindrance" and enjoy equal access to state offices.\(^{24}\) This short-lived assimilationist politics was not of great consequence. Such linguistic unification as occurred during the Revolutionary and Napoleonic period was the result of indirectly assimilationist workings of the army, the schools, and the Napoleonic
administrative machine. Yet the ideological and practical importance of assimilation in the French tradition and the bad name that assimilation has acquired among progressives inclined to celebrate "difference" justify a more general observation. Assimilation—a deliberate policy of making similar—is incompatible with all consistently "organic" conceptions of membership, according to which "natural" ethnolinguistic boundaries are prior to and determinative of national (ideally) state boundaries. It is one thing to want to make all citizens of Utopia speak Utopian, and quite another to want to make all Utopophones citizens of Utopia. Crudely put, the former represents the French, the latter the German model of nationhood. Whether juridical (as in naturalization) or cultural, assimilation presupposes a political conception of membership and the belief, which France took over from the Roman tradition, that the state can turn strangers into citizens, peasants—or immigrant workers—into Frenchmen.

If the French nation-state was invented in 1789, French nationalism was a product of war. On September 20, 1792, at Valmy, under fire from the Prussian army, the best-trained troops in Europe, the ragtag French army held its ground to the cry of "Vive la Nation!" Valmy itself was of no great military significance, but thanks to the celebrated phrase of Goethe, who was present at the battle—"this date and place mark a new epoch in world history"—the episode has come to symbolize the transformation of war through the appeal to the nation in arms. Before the outbreak of war, nationalism existed neither as a "blind and exclusive preference for all that belongs to the nation" nor as a "demand in favor of subject nationalities." Only from 1792 on, when the new order felt itself besieged by enemies within and enemies without, did that develop, superseding the ostentatious fraternal cosmopolitanism and pacifism of 1789–1791 and justified by the doctrine of the "patrie en danger," elements of a xenophobic nationalism at home and an expansive, aggressive, nationalism abroad, originally missionary and crusading, later imperialist and triumphant. The character of this emergent internal and external nationalism was political-ideological, not ethnocultural. But it contributed to the later emergence, during the Napoleonic period, of a German counternationalism in which ethnocultural motifs came to play an important role. Revolutionary expansion, itself driven by political nationalism, thus engendered ethnocultural nationalism; the "crusade for liberty" elicited in response the myth, if not the reality, of a "holy war" of ethnonational resistance.

Romanticism and Reform in Germany

The German tradition of nationhood was formed crucially during the Revolutionary era by the Romantic movement on the one hand and the Prussian reform movement on the other, both occurring in the shadow of the French occupation of Germany. The Romantic movement, though not itself centrally concerned with nationhood, supplied patterns of thought and appraisal for the consolidation, celebration, and eventual repoliticization of the ethnocultural understanding of nationhood. The Prussian reformers, appealing to a radically different conception of nationhood, aimed to "nationalize" the Prussian state from above and thus to regenerate the state after the catastrophic defeat of 1806.

The aesthetic and sociohistorical idiom of German Romanticism was perfectly suited to the elaboration of the ethnocultural conception of nationhood. The celebration of individuality as Einzigkeit, uniqueness, as over against Einzelheit, mere oneness; of depth and inwardness as over against surface polish; of feeling as over against desiccated rationality; of unconscious, organic growth as over against conscious, artificial construction; of the vitality and integrity of traditional, rooted folk cultures as over against the soullessness and artificiality of cosmopolitan culture—all these themes were easily transposed from the domain of aesthetics and cultural criticism to that of social philosophy. In the social and political thought of Romanticism, as in the larger and more enduring body of social and political thought permeated by its fundamental categories and values, nations are conceived as historically rooted, organically developed individualities, united by a distinctive Volksgeist and by its infinitely ramifying expression in language, custom, law, culture, and the state. Despite the emphasis placed on the state, the Romantic understanding of nationhood is fundamentally ethnocultural. The Volksgeist is constitutive, the state merely expressive, of nationhood. The exaltation of the state found in Romantic political thought—Adam Müller's claim, for example, that "man cannot be imagined outside the state . . . The state is the totality of all human concerns"—reflects on the one hand an amorphous, globalizing conception of the state and on the other the teleological notion that the Volksgeist can reach its final and perfect expression only in the state.

The social and political thought of Romanticism was completely divorced from the realities of practical politics. The Prussian reformers, conversely, were untouched by the incipient ethnocultural nationalism
of the period. Awed by the French triumph and the Prussian collapse, they wished to create a Prussian nation to regenerate the Prussian state. Hardenberg wrote to Friedrich Wilhelm III in 1807: "We must do from above what the French have done from below."32 Romantics and reformers understood the relation between nation and state in completely different terms: the former in quasi-aesthetic terms, with the state as the expression of the nation and of its constitutive Volkgeist; the latter in strictly political terms, with the nation—the mobilized and united Staatvolk—as the deliberate and artificial creation of the state.

Thus was engendered the characteristic dualism and tension between ethnonational and state-national ideologies and programs—a dualism that has haunted German politics ever since. This suggests a way of reformulating the rough contrast that supplied the point of departure for these reflections: the contrast between the French political and the German ethnocultural conception of nationhood. In fact, traditions of nationhood have political and cultural components in both countries. These components have been closely integrated in France, where political unity has been understood as constitutive, cultural unity as expressive of nationhood. In the German tradition, in contrast, political and ethnocultural aspects of nationhood have stood in tension with one another, serving as the basis for competing conceptions of nationhood. One such conception is sharply opposed to the French conception: according to this view, ethnocultural unity is constitutive, political unity expressive, of nationhood. While this ethnocultural understanding of nationhood has never had the field to itself, it took root in early-nineteenth-century Germany and has remained widely available for political exploitation ever since. No such essentially ethnocultural conception of nationhood has taken root in France, where cultural nationhood has been conceived as an ingredient, not a competitor, of political nationhood.

Nationhood and Nationalism in the Nineteenth Century

The nineteenth century saw the consolidation of the French and the construction of a German nation-state.33 By the end of the century there were noticeable similarities in the social structure and political style of the two nation-states.34 Nonetheless, the deeply rooted differences in the political and cultural construction of nationhood that I have sketched remained significant, and were in certain respects reinforced. The political, assimilationist understanding of nationhood in France was rein-

forced in the late nineteenth century by the internal mission civilisatrice carried out by the Third Republic's army of schoolteachers—the instituteur, whose mission was to institute the nation.35 And the ethnocultural strand in German self-understanding was reinforced by the intensifying nationality struggle between Germans and Poles—both groups citizens of the German state—in the Prussian east.

Chronic regime instability did not impede the consolidation of the French nation-state in the nineteenth century. If the Bourbon regime of 1815–1830, like the general European settlement imposed by the Congress of Vienna, was antinational, the July Monarchy of 1830–1848 was based implicitly, and all subsequent regimes explicitly, on the principle, if not the reality, of the sovereignty of the nation. More important than this formal constitutional development was the consolidation of national memory effected in the works of historians such as Augustin Thierry, Jules Michelet, and Ernest Lavisse; the pedagogic consolidation carried out by the schools of the Third Republic; the linguistic consolidation furthered by school and army; and the sociogeographic consolidation effected by the development of communication and transportation networks.36

Nationalism, a contradictory mix of chauvinism and messianic universalism, heir to the tradition of Revolutionary and Napoleonic expansion and to the principle of national self-determination, was located on the left for most of the century. After the defeat of 1870–71 it migrated to the right, with the Boulangist crisis of 1889 serving as a crucial pivot and the Dreyfus Affair marking its definitive arrival.37 More precisely, continental nationalism migrated to the right, while the left under Jules Ferry discovered in the 1880s a new field for the projection and reconstruction of national grandeur—a revitalized and expanded overseas empire.38 Ideologically and institutionally, this overseas imperialism was heir to the continental imperialism of the Revolutionary and Napoleonic periods and, more remotely, to the Roman imperial tradition. Ideologically it was conceived as a mission libératrice et civilisatrice; institutionally it went much further than its British or German counterparts in the legal and political assimilation of metropolitan and overseas regimes, aiming at the construction of "la plus grande France."39 French Republicans pursued an assimilationist, civilizing, nationalizing mission inside France as well. In the 1880s this assimilationist internal nationalism, linked to reforms of primary education and military conscription, formed the backdrop to an expansive, assimilationist reform of citizenship law whose central provisions have endured to this day.40
The newly nationalist right, despite its antiparlamentarism, shared with the old nationalist left (and with the new imperialist left) the sense of a privileged mission or vocation for France, a concern for national \textit{grandeur}, and a reverence for the army as the incarnation and instrument of this \textit{grandeur}.

Despite the rise of anti-Semitism toward the end of the century, the new nationalism did not abandon the traditional, essentially political conception of nationhood for an ethnocultural conception. Indeed the question of Alsace-Lorraine led to the ideological accentuation of the French political as against the German ethnocultural understanding of nationhood. Thus Fustel de Coulanges, in his letter of October 27, 1870 to the German historian Mommsen: “It is possible that Alsace is German by race and by language, but it is French by nationality and by its sense of fatherland.” A similar theme was developed by Renan in his polemical letters to Strauss.

The German ethnocultural conception of nationhood was a product of the distinctive political and cultural geography of Central Europe. Yet that same geography—the inextricable intermixture of Germans and other nationalities—made it impossible to found a German state precisely on the ethnocultural nation. None of the proposed solutions to the problem of national unification—including the “classical” Prussian-\textit{kleindeutsch} and Austrian-\textit{großdeutsch} solutions—could bring into being a “perfect” nation-state: either Germans would be excluded, or non-Germans included, or both. Political considerations were dominant both in the programs of 1848 and in the later practice of Bismarck.

Unification under Bismarck, while conditioned, was not inspired by nationalism, still less by ethnocultural nationalism. Nor was the constitutional structure of the unified Reich that of a nation-state. The Constitution did not invoke popular sovereignty, and the Imperial crown was offered to William I in Versailles by the princes, not by representatives of the people. There was no unified German citizenship: \textit{Reichsangehörigkeit} (citizenship of the Empire) derived from \textit{Landesangehörigkeit} (citizenship of the individual constituent states), and its limited political significance reflected the limited political significance of the \textit{Reichstag}. The French nation-state had been constructed in polemical opposition not only to dynastic sovereignty but also to corporate and provincial privilege. The German quasi-nation-state challenged neither principle, even incorporating particular rights—\textit{Reservatrechte}—into the treaties of accession of the South German states.

The Reich was nonetheless understood as a nation-state, both by those who welcomed and by those who feared it. As a nation-state, however, it was imperfect not only in its internal constitution but in its external boundaries—indeed doubly imperfect. As a \textit{kleindeutsches Reich}, it was underinclusive, excluding above all millions of Austrian Germans. At the same time it was overinclusive, including French in Alsace-Lorraine, Danes in North Schleswig, and Poles in eastern Prussia. These were not simply linguistic but rather, especially in the last case, self-conscious national minorities. And the intensifying conflict between Germans and Poles in eastern Prussia reinforced the ethnocultural, differentialist strand in the German understanding of nationhood.

The Reich did make significant progress toward consolidated nationalism between 1871 and 1914—chiefly through the development of new nationwide institutions and processes and through the integrative working of the state on national consciousness. At the outbreak of war Germany was no longer the conspicuously \textit{unvollendete} (unfinished or incomplete) nation-state of 1871. To a considerable extent the Reich had succeeded in integrating the differing, even antagonistic traditions of Prussian statehood and German nationhood. Yet the old dualism survived, the old tension between statist and ethnocultural components in the German tradition of nationhood. In the context of this persisting dualism, two generations were not sufficient to create a consolidated, \textit{selbstverständlich}, taken-for-granted national consciousness, within the frame of the new state. \textit{Reichsrecht} did not completely displace \textit{volksrecht} consciousness in Imperial Germany. The ethnocultural conception of nationhood, though in recess immediately after the \textit{Reichsgründung}, remained available for subsequent political exploitation. This is shown by the important ethnonational component in Prussian and German \textit{Polenpolitik}; by the pan-Germanist agitation around the turn of the century, by the widespread assumption that union with Austria would and should follow the breakup of the Habsburg empire, and by the development of \textit{völkisch} thought and of a \textit{Deutschurn}-oriented politics during the Weimar Republic—to say nothing of the subsequent exploitation of \textit{völkisch} thought by Nazi propagandists.

\subsection*{Understandings of Nationhood and Definitions of Citizenship}

French and German understandings of nationhood have not been fixed and immutable. They have been more fluid, plastic, and internally contested than I have suggested. At the time of the Dreyfus Affair, during the Vichy regime, and again in recent years, the prevailing French
idiom of nationhood—state-centered and assimilationist—has been challenged by a more ethnocultural counteridiom, represented today by Jean-Marie Le Pen. And in Germany the ethnocultural idiom of nationhood has represented only one strand of a more complex national self-understanding.

For several centuries, nonetheless, the prevailing French and German idioms of nationhood have differed markedly; and they continue to differ today. These distinctive understandings of nationhood are embodied and expressed in sharply differing definitions of citizenship. The expansive, assimilationist citizenship law of France, which automatically transforms second-generation immigrants into citizens, reflects the state-centered, assimilationist self-understanding of the French. And the German definition of the citizenry as a community of descent, restrictive toward non-German immigrants yet remarkably expansive toward ethnic Germans from Eastern Europe and the Soviet Union, reflects the pronounced ethnocultural inflection in German self-understanding.

The sharply differing ways of defining the citizenry in France and Germany crystallized in the decades before the First World War, in 1889 and 1913 respectively. The German population during these decades was larger than the French and growing much more rapidly. One might think that differing demographic and military interests led the French and German states to adopt differing definitions of citizenship. I do not accept this instrumentalist explanation. It is true that the French were increasingly concerned about demographic stagnation after the Franco-Prussian War. Yet in the 1880s the state did not need new citizens as soldiers. Now that conscription was defined as a universal obligation of citizenship, the state disposed of too many, not too few, potential soldiers. Since military budgets did not permit the training of all fit and eligible French citizens, there was no military interest in enlarging further the pool of citizens by redefining second-generation immigrants as citizens.

There was, however, a political interest in an expansive definition of citizenship. Republican civic ideology, which emphasized universal and equal military service, made the exemption of second-generation immigrants from military service ideologically scandalous and politically intolerable—especially since second-generation immigrants were not considered true foreigners, but rather persons who were French in fact though not in law. One legislator denounced them, significantly, as prétendus étrangers, “would-be foreigners.” The prevailing characterization of second-generation immigrants as socially and culturally French was made possible by an assimilationist understanding of nationhood. Deeply rooted in political and cultural geography, this assimilationist self-understanding was powerfully reinforced during the 1880s by Republican reforms of school and army. Primary education, under Jules Ferry, was made free, compulsory, secular, and intensely nationalistic, and primary schools became great engines of assimilation, welding France for the first time into a unified nation. The army too, reorganized on the basis of universal conscription and conceived as the “school of the nation,” was an agent of assimilation. If schools and army turned peasants into Frenchmen, as Eugen Weber has shown, they made second-generation immigrants into Frenchmen in the same way. The interest of the French state in an expansive definition of citizenship, then, was not immediately given by demographic or military imperatives. Rather, this interest was mediated—indeed constituted—by a certain way of thinking and talking about membership of the French nation-state.

Nor can the distinctiveness of the German definition of citizenship—restrictive toward non-Germans, yet expansive toward ethnic German immigrants—be interpreted in instrumental terms. In Wilhelmine Germany as in Republican France, understandings of nationhood shaped appraisals of state interests. Yet while the French understanding of nationhood—state-centered and robustly assimilationist—engendered an interest in the civic incorporation of second-generation immigrants, the German understanding of nationhood engendered an interest in their civic exclusion.

Migrant labor was economically indispensable in eastern Prussia in the Wilhelmine era. Yet immigrants—ethnic Poles from Russia and Austria—were not wanted as citizens, for no one believed that they could be made into Germans. In part this was the legacy of a traditionally less assimilationist, more ethnocultural understanding of nationhood. Yet just as the French assimilationist self-understanding was powerfully reinforced in the 1880s, so too the German ethnocultural, differentialist self-understanding was powerfully reinforced in the Wilhelmine era by the increasingly evident failure of attempts to assimilate indigenous Poles in the Prussian east. Having failed to secure the political loyalty of Poles to the German state, and having failed to assimilate them to German language and culture, Prussian and German policy toward the indigenous Poles became increasingly “dissimilationist.” The state openly discriminated by ethnic nationality, treating ethnic Germans and ethnic Poles differently in an effort to “strengthen Germanum” in
frontier districts. Since the state had failed to assimilate indigenous Poles in the Prussian east, there was no reason to believe that it would succeed in assimilating immigrant Poles. An ethnocultural, differentialist way of thinking and talking about membership of the German nation-state thus supported an interest in a restrictive definition of citizenship. An expansive citizenship law like that of France, automatically transforming second-generation immigrants into citizens, presupposed confidence in their effective assimilation. The French elite possessed that confidence; the German elite did not.

In rejecting an instrumentalist account of French and German citizenship policies and practices, I do not replace it with a naively culturalist account. Instead, I show how particular cultural idioms—ways of thinking and talking about nationhood that have been state-centered and assimilationist in France, and more ethnocultural and differentialist in Germany—were reinforced and activated in specific historical and institutional settings; and how, once reinforced and activated, these cultural idioms framed and shaped judgments of what was politically imperative, of what was in the interest of the state. Understandings of nationhood and interests of state are not antithetical categories. State interests in an expansive or restrictive citizenry are not immediately given by economic, demographic, or military considerations. Rather, judgments of what is in the interest of the state are mediated by self-understandings, by cultural idioms, by ways of thinking and talking about nationhood.

The more general analytical point is that cultural idioms are not neutral vehicles for the expression of preexisting interests: cultural idioms constitute interests as much as they express them. These culturally mediated and thereby culturally constituted interests are not prior to, or independent of, the cultural idioms in which they are expressed. As Gareth Stedman Jones has argued, “We cannot . . . decode political language to reach a primal and material expression of interest since it is the discursive structure of political language which conceives and defines interest in the first place. What we must therefore do is to study the production of interest, identification, grievance and aspiration within political languages themselves.”

I do not subscribe to Stedman Jones’s purely culturalist perspective. Idioms of nationhood, as I have suggested, are ultimately rooted in political and cultural geography; and they are proximately rooted in, and reinforced by, experiences and practices that, while linguistically mediated, are not reducible to speech acts. If it is necessary to “study the production of interest . . . within political languages,” it is also necessary to study the social production and reproduction of political languages themselves. Yet Stedman Jones provides a powerful argument for attending to the way in which cultural idioms constitute rather than merely express interests.

“Not ideas,” wrote Max Weber, “but interests—material and ideal—directly govern men’s conduct. Yet very frequently the ‘world images’ that have been created by ‘ideas’ have, like switchmen, determined the tracks along which action has been pushed by the dynamic of interest.” Differences in citizenship policies and practices are not produced exclusively or immediately by differing understandings of nationhood. Of course definitions of citizenship are conditioned by state interests. But conceptions of nationhood, to adopt the terms of Weber’s metaphor, have determined the tracks along which the politics of citizenship has been driven by the dynamic of interests. Part II of this study seeks to demonstrate this in detail, focusing on pivotal moments in the shaping and reshaping of citizenship law in France and Germany. Part I, laying the groundwork for these discussions, provides a more general account of the origins and workings of the modern institution of citizenship.
4 • Citizenship and Naturalization in France and Germany

Citizenship, we have seen, is inherently bounded; it is everywhere an instrument and object of social closure. Yet the bounds of belonging are drawn differently in different polities. This was true in ancient Greece where, as Aristotle observed, “the man who is a citizen in a democracy is often not one in an oligarchy.”

And it remains true in modern Europe, where the immigrant who would be a citizen in France would often not be one in Germany—unless he happened to be of ethnic German origin. The rate of civic incorporation for migrant workers and their descendants is more than ten times higher in France than in Germany. And the gap is even greater for second- and third-generation immigrants. A generation of young Franco-Portuguese, Franco-Algerians, and Franco-Moroccans is emerging, claiming and exercising the rights of French citizenship. In Germany, by contrast, nearly half a million second-generation Turkish immigrants, born and raised in Germany, remain outside the community of citizens.

The sharply differing definitions of citizenship are particularly striking in view of the similar French and German experiences with migrant labor in the last quarter-century. In both countries foreign workers were recruited in large numbers in the 1960s and early 1970s in response to labor shortages. Organized recruitment was suspended in 1973–74, partly in response to the oil shock and ensuing recession, partly in response to the growing concern about the social and political consequences of large-scale immigration. Nonetheless, populations of immigrant origin have continued to grow in both countries, largely through family reunification.

Immigrants in both countries have become dramatically more visible in everyday life during the last two decades. During the 1950s and early 1960s most foreign workers were either single or separated from their
families. Many lived in isolated workers’ hostels. Outside the workplace they were largely invisible, participating little in the social, cultural, or political life of the host society. In the last two decades, however, the sojourners have become settlers. Single workers were joined by their families, or formed new families. Immigrants became neighbors, schoolmates, and joint users of public spaces. An increasingly vocal second generation emerged, tenaciously rooted in the culture of the parents’ generation, yet economically and socially marginalized in the country of residence. Groups marked by dress, language, religion, and custom as “culturally distant” comprised the fastest-growing segment of the immigrant community. Immigrants in both countries have clustered in particular regions and, within cities, in particular neighborhoods. All these developments made immigrants much more visible.

In both countries immigrants comprise a substantial fraction of the manual working class and are overrepresented in dirty, dangerous, unpleasant, ill-paid, and menial occupations. They are also overrepresented among the unemployed. As a relatively young group, with comparatively high fertility rates, immigrants play a similar demographic role in France and Germany, which share concerns about low fertility and aging populations. This has implications for the labor market, the social security system, and, in the longer run, for military conscription—if peacetime conscription survives the great geopolitical reconfiguration now under way.

Discourse about immigration and immigrants follows similar patterns in both countries. There is an inclusionary discourse that stresses the economic and cultural contribution of immigrants to the host society and the values of tolerance and diversity. And there is a counterdiscourse stressing the unassimilability of immigrants, the dangers of excessive cultural heterogeneity, the social strains and economic costs of immigration, and the prospect of Islamic fundamentalism and interethnic strife. Finally, there are striking similarities in immigration policies. Since the mid-1970s all French and German governments, left and right, have pursued the same threefold policy, seeking to impose strict limits on further immigration, to encourage voluntary return migration, and to facilitate the integration of second-generation immigrants.

There are of course significant differences between French and German experiences with immigration. Many immigrants to France have come from former French colonies and protectorates, while immigration to Germany has lacked this colonial connection. Both countries have been concerned with undocumented immigration and with an upsurge in the number of persons seeking political asylum, but the French have been particularly preoccupied with the former, the Germans with the latter. Jean-Marie Le Pen’s National Front has fared much better in France than any far-right xenophobic party in Germany. France is particularly concerned about migration from the south, from the Maghreb and sub-Saharan Africa, Germany about migration from the east, especially from Poland and the ex-Soviet Union. And since the massive exodus thirty years ago of colonial settlers from postindependence Algeria, there has been no French analogue to the great migration of ethnic Germans from Eastern Europe and the Soviet Union, which brought over a million immigrants to Germany between 1988 and 1991.

Patterns of Naturalization and Definitions of Citizenship

Despite these differences, the overall picture is one of similar migration processes, comparable immigrant populations, and converging immigration policies. In the context of these thoroughgoing similarities, the sharply differing policies and politics of citizenship stand out as a striking anomaly. In the first place, German naturalization policies, although recently liberalized, remain more restrictive than those of France. Ten years’ residence is ordinarily required in Germany, five years in France. More important, candidates for naturalization must ordinarily renounce their original citizenship in Germany, but not in France. Besides these specific differences in requirements, there are more general differences in attitudes toward naturalization. Germany lacks a political culture supportive of naturalization. This is clearly expressed in the administrative regulations governing naturalization, which state unambiguously that “the Federal Republic is not a country of immigration [and] does not strive to increase the number of its citizens through naturalization.” In countries of immigration like the United States and Canada naturalization is expected of immigrants; the failure to naturalize is anomalous. In France too, which alone in Continental Europe has a tradition of immigration for purposes of permanent settlement, naturalization has been considered the normal and desirable outcome of permanent settlement. In German self-understanding, by contrast, one cannot join the nation-state by voluntary adhesion (the North American model) or state-sponsored assimilation (the French model).

Immigrants’ attitudes toward naturalization, moreover, differ in France and Germany. In 1985 only 6 percent of German migrant workers and family members, and 9 percent of those aged fifteen to twenty-four,
intended to naturalize, while about a quarter of young foreigners in France intend to become citizens. The very low propensity to naturalize among German immigrants, many of whom clearly would qualify for naturalization, reflects a desire to retain their original citizenship. Beyond this, though, the differential interest in naturalization may reflect different understandings of what naturalization means in France and Germany. To a greater extent in Germany than in France, it appears, naturalization is perceived as involving not only a change in legal status, but a change in nature, a change in political and cultural identity, a social transsubstantiation that immigrants have difficulty imagining, let alone desiring. Evidence of this blurring, in the minds of immigrants, between legal citizenship and a richer, more diffuse notion of ethnocultural nationality can be found in France as well. In France, however, a larger fraction of the immigrant population seems to have adopted a more instrumental, "desacralized" understanding of citizenship, seems to have divorced the legal question of citizenship from broader questions of political loyalty and cultural belonging.

These differences in policies and attitudes toward naturalization are reflected in naturalization rates that are four to five times higher in France than in Germany for the main groups of migrant workers and their dependents (see Tables 1 and 2). Italians naturalize at rates five times higher, Spanish at rates ten times higher in France than in Germany. And Moroccans and Tunisians in France naturalize at rates nearly ten times higher than that of Turks in Germany. Of the 1.5 million Turks in Germany, over 1 million of whom have resided there ten or more years, and more than 400,000 of whom were born there, only about 1,000 acquire German citizenship each year. Even if rates increased tenfold, naturalizations would still be far outweighed by the 25-30,000 new Turkish citizens born each year in the Federal Republic.

The German government has been saying since the mid-1980s that it favors the naturalization of second-generation immigrants, observing that "no state can in the long run accept that a significant part of its population remain outside the political community." And in 1990 the legal provisions governing naturalization were liberalized for persons brought up in Germany and educated at German schools, as well as for persons having resided more than fifteen years in Germany. Over time, a modest increase in naturalization rates is to be expected as the immigrant population becomes increasingly settled. Yet patterns of naturalization are unlikely to change dramatically. The most important obstacle to naturalization—the requirement that candidates give up their original citizenship—was not touched by the 1990 reform. Moreover, the

<table>
<thead>
<tr>
<th>Original citizenship</th>
<th>A Resident population, 1982 Census</th>
<th>B Resident population with 7+ years residence (1982)</th>
<th>C Annual naturalizations¹</th>
<th>D Average annual naturalizations per 1,000 residents</th>
<th>E Average annual naturalizations per 1,000 residents with 7+ years' residence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Algerians</td>
<td>800,000</td>
<td>700,000</td>
<td>2,787</td>
<td>3.5</td>
<td>4.0</td>
</tr>
<tr>
<td>Moroccans</td>
<td>430,000</td>
<td>310,000</td>
<td>3,528</td>
<td>8.2</td>
<td>11.4</td>
</tr>
<tr>
<td>Tunisians</td>
<td>190,000</td>
<td>150,000</td>
<td>1,883</td>
<td>9.9</td>
<td>12.6</td>
</tr>
<tr>
<td>Portuguese</td>
<td>760,000</td>
<td>680,000</td>
<td>7,145</td>
<td>9.4</td>
<td>10.5</td>
</tr>
<tr>
<td>Spanish</td>
<td>320,000</td>
<td>300,000</td>
<td>5,109</td>
<td>16.0</td>
<td>17.0</td>
</tr>
<tr>
<td>Italians</td>
<td>330,000</td>
<td>310,000</td>
<td>3,644</td>
<td>11.0</td>
<td>11.8</td>
</tr>
<tr>
<td>Total for these groups</td>
<td>2,830,000</td>
<td>2,450,000</td>
<td>24,096</td>
<td>8.5</td>
<td>9.8</td>
</tr>
</tbody>
</table>

¹ This includes acquisitions of citizenship by declaration on the part of spouses of citizens and foreign-born children of foreign parents. Since the breakdown of such declarations by original citizenship has been available only since 1984, the figures in this column, and the rates in columns D and E, represent the 1981-1989 annual averages for discretionary naturalizations plus the 1983-1989 averages for declarative acquisitions. Column C also includes "reintegrations," meaning reacquisitions of French citizenship on the part of persons formerly possessing it and subsequently having lost it. This category is significant for Algerians, accounting for 52 percent of all voluntary acquisitions of nationality by Algerians between 1985 and 1989; but it is negligible for all other core immigrant groups.

barriers to naturalization lie not only in the restrictiveness of legal provisions but equally in the political culture of naturalization, embodied in attitudes of Germans and immigrants alike. Without a changed understanding of what it is to be—or to become—German, the liberalization of naturalization policy will not produce a dramatic surge in naturalization.

Naturalization rates, then, are four to five times higher in France than
naturalization rules in shaping patterns of civic incorporation in France and Germany. Ascription constitutes and perpetually reconstitutes the citizenry; naturalization reshapes it at the margins. The striking difference in the civic incorporation of immigrants in France and Germany is chiefly a consequence of diverging rules of ascription. Differing naturalization rules and rates reinforce this difference but are not its fundamental source.

The central difference between French and German ascription rules turns on the significance attached to birth and prolonged residence in the territory. While French citizenship is ascribed, at birth or majority, to most persons born on French territory of foreign parents, German citizenship is ascribed only on the basis of descent. Birth and prolonged residence in Germany have no bearing on citizenship status. French citizenship law automatically transforms most second- and third-generation immigrants into citizens; German citizenship law allows immigrants and their descendants to remain foreigners indefinitely.

In both France and Germany, to be sure, as throughout Continental Europe, citizenship is ascribed to children of citizens, following the principle of *jus sanguinis*. In Britain and the Americas, by contrast, citizenship is ascribed to all persons born in the territory, following the principle of *jus soli*. What I want to highlight here is the sharp difference in the extent to which France and Germany, sharing the same basic principle of *jus sanguinis*, supplement this principle with elements of *jus soli*. France and Germany represent polar cases: French citizenship law includes a substantial territorial component; German citizenship law includes none at all. Most other Western European *jus sanguinis* countries include some complementary elements of *jus soli*, without going as far as France.

Although based on *jus sanguinis*, French citizenship law incorporates substantial elements of *jus soli*. Thus, French citizenship is attributed at birth to a child born in France if at least one parent was also born in France—including Algeria and other colonies and territories before their independence. This means that the large majority of the roughly 400,000 children born in France of Algerian parents in the quarter-century following Algerian independence are French citizens. Moreover, citizenship is acquired automatically at age 18 by all children born in France of foreign parents, provided they have resided in France for the last five years and have not been the object of certain criminal condemnations. By this means roughly 300,000 persons became French between 1973 and 1991. More than a million foreign residents are under age 18. At least
two-thirds of them were born in France and are destined to become French at age 18. Thus, although the citizenship law of the United States is based on jus soli, while that of France is based on jus sanguinis, the result—as far as second-generation immigrants are concerned—is similar: almost all persons born in France and residing there at majority have French citizenship. German citizenship law, in contrast, is based exclusively on jus sanguinis. Birth in the territory, even coupled with prolonged residence, has no bearing on citizenship. Second-generation and even third-generation immigrants can acquire German citizenship only through naturalization.

Table 3 shows the combined effects of differing rules of ascription and rates of naturalization on the civic incorporation of the major immigrant groups (excluding ethnic German immigrants to Germany). Of the nearly three million foreign residents from the core immigrant groups in Germany, fewer than 5,000 acquire German citizenship each year, and nearly half of these are Yugoslavs. France, on the other hand, gains more than 53,000 new citizens each year from a slightly smaller core immigrant population. This includes about 16,600 persons defined as French at birth each year by virtue of birth in France in conjunction with the birth of at least one parent in preindependence Algeria, and another 12,700 persons born in France and defined as French on attaining legal majority. The overall rate of civic incorporation for these core immigrant groups is thus more than ten times higher in France than in Germany.

For second- and third-generation immigrants, the difference in rates of civic incorporation is greater still. In both France and Germany new immigration declined precipitously after 1973. As a result, a steadily increasing fraction of the population of immigrant origin consists of persons born in France or Germany. In France almost all of these persons are either defined as French at birth or programmed to become French automatically at age 18. In Germany, which lacks any mechanism of automatic civic incorporation, second- and third-generation immigrants will have to naturalize if they want to become citizens. And there is no indication that they will do so in large numbers.

One further peculiarity of German citizenship law should be noted. While the citizenry is defined restrictively vis-à-vis non-German immigrants, it is defined expansively vis-à-vis ethnic Germans. This ethnic inclusiveness has two aspects. First, the citizenry recognized by the Federal Republic of Germany always included the citizens of the German Democratic Republic. As far as citizenship law is concerned, the division of Germany never happened. Or rather it happened only from the East German side. From 1967 through 1990, there was a separate East German citizenship, but there never was a separate West German citizenship. Not wanting to validate the division of Germany, the West German authorities insisted on the continued validity of a single German citizenship. As the two Germanies consolidated their separate statehoods, this insistence on a single citizenship came to seem increasingly anomalous. Yet it took on dramatic new meaning in the fall of 1989 and spring of 1990, for it was the common German citizenship that guaranteed every East German, as a German citizen, the constitutional right to enter, reside, and work in West Germany. Common citizenship paved the way for the reestablishment of common statehood.

The second aspect of the ethnic inclusiveness of German citizenship pertains to the ethnic German immigrants from Eastern Europe and the Soviet Union. These immigrants are treated very differently from non-

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Table 3. Combined effects of naturalization and the ascription of citizenship on the civic incorporation of core immigrant groups in France and Germany (annual averages). *

<table>
<thead>
<tr>
<th>Manner of becoming a citizen</th>
<th>France</th>
<th>Germany</th>
</tr>
</thead>
<tbody>
<tr>
<td>Naturalization and declarative acquisition</td>
<td>24,100⁶</td>
<td>4,500⁶</td>
</tr>
<tr>
<td>Attribution of citizenship to persons born in country, one parent also born in country</td>
<td>16,600⁴</td>
<td>—</td>
</tr>
<tr>
<td>Attribution of citizenship at majority to persons born in country and residing there for last five years</td>
<td>12,700⁷</td>
<td>—</td>
</tr>
</tbody>
</table>

Total acquiring citizenship or having it attributed to them | 53,400 | 4,500 |

Source: Tables 1–2, except as otherwise indicated.
* The core immigrant groups include Algerians, Moroccans, Tunisians, Portuguese, Spanish, and Italians in France, and Turks, Yugoslavs, Italians, Greeks, and Spanish in Germany.
- b. 1981–1989. Includes reintegrations (see note to Table 1).
- e. Lebon’s estimate of 16,930 annually for 1981–1986 (ibid., p. 12) is for the foreign population as a whole. Since core immigrant groups account for three-fourths of the total foreign population, I have assumed that they account for three-fourths of these cases.
German immigrants. They are legally defined as Germans and immediately accorded all the rights of citizenship. The liberalization of emigration and travel policies in Eastern Europe and the Soviet Union has engendered a great exodus of ethnic Germans from this region, particularly from Poland, Romania, and the Soviet Union, reversing the centuries-old *Drang nach Osten* of Germans into Slavic lands. Over a million ethnic Germans arrived in Germany between 1988 and 1991; at this writing, the flow continues unabated.

The policies and politics of citizenship are strikingly different in France and Germany. Naturalization policies and practices are more liberal and naturalization rates four to five times higher in France. French citizenship, moreover, is automatically attributed to French-born children of immigrants at their majority, while German citizenship is based solely on descent. As a result, the rate of civic incorporation for migrant workers and their families is more than ten times higher in France than in Germany. Yet while German citizenship is closed to non-German immigrants, it is remarkably open to ethnic German immigrants from Eastern Europe and the Soviet Union. The following chapters seek to explain the origin and persistence of these sharply differing definitions of citizenship.