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978-0-521-14541-1 - The Ironies of Citizenship: Naturalization and Integration in Industrialized Countries

Thomas Janoski

Excerpt

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I

Introduction*The Politics of Granting Citizenship*

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

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

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

And he said, “Yes.”

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

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

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

New Testament, Acts 25–29

When antiforeigner demonstrations with fire bombings and eight murders occurred in Germany in 1992 and 1993, Chancellor Helmut Kohl expressed outrage, but he also said he understood why many native Germans were frustrated with asylum laws and could resort to violence. Although many foreigners were second- and third-generation descendants of guest workers who lived in the country all their lives and who spoke only German, native Germans received the message that their attitudes toward foreigners had some legitimacy. The first Turkish-German representative in the Bundestag, Cem Özdemir, asked why Kohl did not meet with the families of the victims (1999, p. 109). However, the reasons are clear to political analysts. Few guest workers could vote, support candidates, organize political opposition, or hold office (Green 2004, p. 85). If they had been citizens, Chancellor Kohl would have worried about their vote, opinions, and opposition. But with so few of them being German citizens, the Chancellor could afford to give them little regard. Further, when many of these foreigners can be easily deported, especially in a context of fear of terrorism, citizenship would have provided them with peace of mind. Clearly, citizenship achieved through naturalization or birth on native soil matters.

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The nationality and naturalization policies of a country are important gauges of how society accepts or rejects foreigners and long-term residents. Countries with high naturalization rates react more strongly to antiforeigner attacks and murders. Their reactions are different because naturalized immigrants can vote, organize, and protest. In France in the 1980s, conservative parties backed by La Pen's nationalist attack from the radical right challenged the *jus soli* principle. They enacted stricter naturalization policies, especially for *jus soli* citizenship. However, students and naturalized immigrants worked together through SOS-Racisme and other groups to prevent the government from enacting most anti-immigrant demands. When the Socialists regained power, they reversed the *jus soli* decision and went in a more liberal direction (Howard 2009, pp. 149–54; Feldblum 1999; Brubaker 1992, pp. 148–51). In Canada where the highest naturalization rates prevail, few if any naturalization restrictions, fire bombings, or murders are seen.

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

In the last four decades, naturalization rates in advanced industrialized countries, including both naturalizations and citizenship by birth to foreign parents (*jus soli* births), have varied widely. From 1970 to 2005, naturalizations per 100,000 foreign residents averaged more than 11,000 citizens in Canada compared to 840 citizens in Germany.¹ The most open country's naturalization rate was more than ten times larger than the more closed country. From 2005 to 2006, the rates were 15,300 and 2,200 for the same two countries. Still a massive difference! In open countries, immigrants can quickly become citizens, vote, and form interest groups; in more closed countries, immigrants rarely vote and are subject to deportation if they lose their jobs or get in trouble with the law. In open countries, immigrant children born in the receiving country obtain citizenship according to *jus soli* principles, whereas in closed countries, such children may have to wait until adulthood for naturalization, which can be a process fraught with difficulties. Why do such massive and long-lasting differences in naturalization exist?

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

¹ Naturalization rates have been recently collected in a more reliable form but are still contested. The approach used here as well as other approaches are discussed in Chapter 2.

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

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

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

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

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and statistical explanations will be backed by historical case studies comparing similar and different countries in six separate chapters.

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

Theories of Nationality Are Not the Same as Those of Immigration

Naturalization theories are underdeveloped in two ways – they are either ignored, or they are confused with theories of immigration. First, T. H. Marshall in his seminal work on citizenship in the 1950s (1964) hardly mentions naturalization. Christian Joppke at one point questions whether a general theory of immigration and citizenship is possible (1999b, p. 633; 1999a). Although one prominent group of theorists in a comprehensive review of international immigration proclaims that “the means, mechanisms, and policies by which immigrants adapt to and are incorporated within receiving societies” are of “clear and unambiguous importance,” they gloss over explanations of nationality and naturalization, as do many others (Massey et al. 1998, pp. 3, 8–14; Cornelius and Rosenblum 2005).² Of the theories mentioned above, Brubaker’s (1992) cultural idiom explanation of France and Germany was the first direct theory of nationality and naturalization.³

Second, immigration theory is mistakenly seen as being able to explain nationality and naturalization in three ways. First, demographic or economic theories frequently point to the state and economy needing people and specifically workers. This is a good explanation for immigration, but not for

² Massey et al. (1998, pp. 34–41) include “historical-structural theory and world systems” as a theoretical tradition. However, most of this is a sending country theory concerning the impact of globalization.

³ Irene Bloemraad’s work on Canadian and U.S. naturalization processes is an exception. She avoids cultural idioms, naturalization barriers, and the characteristics of immigrants. Instead, she focuses on the reception that immigrants receive vis-à-vis naturalization. Canada welcomes and encourages naturalization from the top, and the United States has the cooler welcome and relies on nonprofits and local governments operating from the bottom. This institutional approach with two settler countries is convincing, but how it would fare with colonizers and noncolonizers is less clear (1999, 2006). However, her theory is useful in demonstrating that factors other than nationality law can influence naturalization rates (as discussed in this book on Austria and Canada).

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

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

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

Explaining Institutional Regime Causes of Nationality Rates over Centuries

Massey et al. say that “international migration rarely engaged the interests of theorists working in the historical-structural tradition” (1998, p. 35). But

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there has been increasing interest in sociology and political science on nationality at the macrolevel (Hollifield 1992, pp. 19–41, 2000; Joppke 2005). Three perspectives explicitly target long-term causal mechanisms that bring about differential naturalization processes: (1) demographic and economic theories, (2) the cultural idiom approach, and (3) political economy theories based on colonialism.

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

Related to this theory are demographic models where immigration results from size of countries, crowding, and the distance migrants travel (Mohlo 1986, pp. 105–7; Massey et al. 1998). Population density in the immigrants' country of origin would be a push factor toward naturalization, but population density in the receiving country has a negative effect. Countries with high population density often claim that their lands are too crowded to allow for increased immigration. This theory has a political component because it claims that the state passes laws to prevent further immigration and to make naturalization difficult. But crowding and distance models are clearly not as important as demographic decline explanations. From 1880 to 1950, demographic decline fit France, and the political component appeared with strong advocates for immigration and naturalization. Whereas other countries arrived at demographic decline much later, nearly all advanced industrialized countries now experience declining birth rates. Consequently, the inherent labor shortage similarities cannot explain large differences in naturalization rates. Hence, demography often poses the problem but does not explain the many and highly variable approaches to naturalization.⁴

The second major approach uses culture to explain why some countries are open and others reluctant to accept strangers and their children. Brubaker's work (1992, 1989) on citizenship and nationhood uses a “cultural idiom”

⁴ When country birth rates differ significantly, demography is useful for explaining naturalization (e.g., the impact of declining birth rates on France's naturalization laws in the 1890s). But when all birth rates decline at similar rates, demography is largely a constant that cannot explain change.

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approach (i.e., ways of thinking and talking about nationhood).⁵ He demonstrates that cultural idioms formed in the crucible of the French Revolution or developed indigenously over time in Germany. The French Revolution transformed “belonging” to French society into active participation based on rights and obligations, which fixed citizenship upon the nation-state. Prior bases for rights in terms of belonging came from the cosmopolitan aristocracy in the *ancien regime*. Modern citizenship began with an act of closure upon the French nation-state. Those who opposed the state were executed and citizens were conscripted to protect the republic. This cultural crucible created the French approach to universality that allows nearly anyone who assimilates and supports French cultural and political norms to become a citizen. Consequently, French naturalization rates are considered high for a densely populated European country, and the legal principles of *jus soli* (birth on national soil) predominate over *jus sanguinis* (blood descent) (Brubaker 1992, pp. 35–49).

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

Brubaker’s theory is well argued as a macro-social explanation of naturalization, but his long-term causal mechanism is vague and open to question.⁶ Searching for the genetic code of citizenship policies lacks force as an argument because it looks at unique events that must have a continuous effect over centuries. Where are the developmental mechanisms, and who are the agents acting them out? This lack of theoretical specificity invites the reader to look to other historical periods for other cultural idioms.⁷ Thus, one may examine the

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

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

⁷ One might see cultural idioms that French are a product of fusion, whereas the Germans are a product of segregation. The French Revolution reenacted the struggle between Frankish nobility,

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early state in each country to find other universalistic or particularistic idioms for the state's acceptance or rejection of immigrants.

In addition, a theory based on uniqueness does not provide guidance in explaining naturalization in other countries. Only the French had the French Revolution, but what explains more open citizenship policies in the United Kingdom or the closed policies in Japan? Cultural idioms are idiographic and provide little guidance for explaining other countries, except for looking to each country's unique historical development. This may lead people to claim that causal analysis is not really possible.⁸ Brubaker states that citizenship debates are more about the "politics of identity" than the "politics of interest" (1992, p. 182). But these two questions are more intimately related than Brubaker claims, and "who has what identity" critically depends on "who gets what resources" and "how they are obtained." The next theory addresses these questions.

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

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

who invaded France at the start of the Middle Ages, and the vanquished Gauls (Noiriel 1993, p. 72; Ertman 1997). The Teutonic knights were accused of segregating themselves by importing Germans and avoiding Polish nobility and peasants (Carsten 1954; Graus 1970; Bosl 1970; Schumacher 1958).

⁸ Joppke states that "these factors are interwoven in unique, complex, and interactive ways" and that "it would be futile to dissect them as independent variables for the purpose of a more rigid causal analysis" (1995, p. 48). However, one might derive ideal types of universalistic citizenship (*ius soli*) and folk national identity (*ius sanguinis*) from Brubaker's two case studies. While this extrapolation is possible (Zolberg 1999, p. 92), it contradicts Brubaker's stated theory of cultural idioms.

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consisting of colonizer, noncolonizer (including occupier), settler, and Nordic regimes.⁹

Colonizing Countries

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

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

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

⁹ This theory was first put forth with cross-national tables in Janoski and Glennie (1995) and in Janoski (1998). It was put into a larger contextual framework in Janoski and Wang (2005), and additional support was provided in Janoski, Lepadatu, and Diggs (2003) and Janoski (2009).

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cooperative natives fill administrative, governmental, and police posts for the colonizing country. These cooperative natives will not work with too large a rights deficit and require adequate payment and status. Consequently, the relative deprivation of rights and privileges between this cooperative group of natives and colonizers will be reduced over time through cultural assimilation and promises of increased rights. Conflicts over discrimination concerning these rights are temporary setbacks that lead to an even stronger emphasis on these citizenship processes (Spitzer 1990).

Third, in order to be fully socialized into the colonizing country's ideas and technologies of control, some cooperative natives are sent to the colonizers' universities to improve their work in the colonies (Headrick 1978; Kirk-Greene 1980). Numerous military officers graduate from national military academies, and future political leaders attend elite universities. These natives may either stay or later return to their home countries.

In the fourth stage of colonization, colonial natives risk or give their lives in military service for the colonizer. With the exception of mercenary units, military service creates citizenship claims on the state. To give weapons to the very people whom a colonizer represses requires a great deal of internalized social control over that group. The military service of the Ambionese, Black Hollanders, Gurkhas, Sikhs, *Tirailleurs Sénégalais*, and others under the colonizer increases their claims on the colonial state (Betts 1985, pp. 12–46; Caplan 1995; Mellors and McKean 1984).¹⁰ After working faithfully in the colony and fighting the colonizer's wars, natives make claims for greater citizenship. These natives and their families gradually receive citizenship rights in their native lands. In the fifth stage, colonial natives immigrate and claim citizenship rights, sometimes having legal status as citizens and other times not.

The multiple stages of colonization take at least fifty and as many as a 100 years. Countries that were occupiers in the first stage of colonization (e.g., Japan, Belgium, and Germany) maintain parochial and intolerant attitudes toward immigrants who seek to become citizens. Crawford Young states this aspect of “the legitimation dilemma in the consolidation phase appeared only in the French and British colonial realms” (1994, p. 169), but this book argues that it also existed in other colonizers such as the Netherlands and Austria.

Noncolonizing and Occupying Countries

If colonization does not reach the social control stage, the state has no incentive to offer naturalization. The immigration of colonized natives to the motherland and emigration of Europeans to the colonies does not occur, and consequently, naturalization and *ius soli* nationality are low. The timing of state strength is

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