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Citizenship and immigration in Western Europe: National trajectories under postnational conditions? A qualitative comparative analysis of selected countries



Thorsten Wallbott *Citizenship and immigration in Western Europe: National trajectories under postnational conditions? A qualitative comparative analysis of selected countries*

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Abstract

Citizenship rights for immigrants have emerged as a major point of reference in public and academic debates surrounding the regulation of ethnic and cultural diversity across Western European states. In this regard, the modern institution of citizenship can be described as an effective mechanism of social closure that is based on legal criteria of national membership. This Working Paper investigates under which conditions Western European countries of immigration have added liberal elements to their citizenship laws in the post-war era while others have maintained rather restrictive configurations. Employing a historical-comparative research design, the study brings together concepts of national path dependency, the role played by political actors as well as postnational approaches focusing on multilateral treaties. Here, the method of fuzzy-set QCA is particularly suited to reveal modes of causal interaction and equifinality that basically shape contingent policy developments across states. Looking at a diverse sample of seven European countries between 1980 and 2010, the empirical results point to the importance of specific legal traditions in explaining the direction and timing of liberalizing change. Yet, they only serve as the context for ongoing political contestations over access to citizenship for immigrants which in turn inhibit convergent or even postnational patterns of policy change. Rather, preexisting cross-national differences are continuously reproduced in nationally specific ways.

Keywords: Citizenship, Western Europe, QCA, fuzzy sets, Path Dependency, Postnationalism.

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1. Introduction

Over the last few decades, citizenship has evolved as a major focal point in public debates surrounding the regulation of immigration-related diversity across Western European nation states.¹ As these states have successively become countries of immigration during the postwar era, access to citizenship emerged as a salient political issue in regard to the integration of permanently settled immigrant communities. In the context of border-crossing migration, particular ways in which nation states define their citizenry are highly consequential for the individual migrant, since the group of citizens usually enjoys various privileges as opposed to the status of non-citizens, such as the possession of a passport and prospects of free movement, the exclusive access to public positions and the participation in democratic elections as well as the possibility to benefit from welfare state arrangements.

In this regard, the recent sociology of citizenship has addressed the inherent ambivalence of universalism and particularism that has shaped the formation of modern nation states and that continues to characterize nationality laws and integration policies in particular (Joppke 2010: 8-9). By determining the legal criteria of national membership, modern citizenship has been famously described as an effective mechanism of social closure (Brubaker 1992). And while early empirical research in the field was mainly characterized by single case studies with limitations for broader validity, lately one can observe a growing body of theoretically informed studies that aim at comparing a relatively broad range of cases across Western Europe.² These comparisons have clearly led to a growing quantification of data on the way citizenship policies are conceptualized and measured, particularly in recent attempts to build systematic citizenship indices (for an overview, see Helbling 2013). Yet, the state of empirical research still displays considerable inconsistencies. On the one hand, one is still looking futilely for coherent frameworks that systematically bring together the several theoretical approaches in the field of citizenship and immigration that stand somewhat opposed to each other. As early accounts offered a rather simplified perspective on distinctive national paths of citizenship policies, recent

¹ In this paper, modern citizenship regimes are generally understood as a set of institutionalized relations between the state and the individual (Tilly 1995: 8). Accordingly, they consist of organizational rules of formal membership and a bundle of specific rights and duties through which individual citizens are incorporated into the modern state while also implicating symbolic forms of national identification (Habermas 1992: 3).

² See, for example, the work by Waldrauch, Hofinger 1997, Koopmans 2005, Howard 2009, Janoski 2010, Vink, de Groot 2010, Koopmans et al. 2012.

sociological debates have been triggered by rather ambiguous postnational concepts that accentuate the embeddedness of national citizenship regimes into transnational discourses of human rights. Other major shortcomings in the existing literature are the ongoing reliance on mono-causal explanations and a lack of attention towards historical variations in policies of integrating foreigners and their descendants. Here, a growing number of studies rather tend to focus on unidirectional change of liber-alization across Western Europe, even though the story is more complicated and, as will be shown below, several countries have moved in opposite directions.

Therefore, a crucial task for contemporary scholars of migration and citizenship is to comparatively sketch out the political, institutional and ideological conditions that underlie such boundaries of inclusion and exclusion. Against this background, the empirical analysis presented in this paper seeks to make a contribution to the literature by applying the method of Qualitative Comparative Analysis (QCA) in order to explore under which conditions certain countries have added liberal elements to their citizenship laws while others have maintained rather restrictive configurations. In this regard, the Western European context tells a unique story about how traditional nation states use a set of policy instruments in variable ways to incorporate immigration-related diversity, while, at the same time, tendencies of supranational integration have progressed further than in any other world region. Taken together, this provides a fruitful constellation for the purpose of explaining cross-national convergences vis-à-vis the maintenance of peculiar citizenship policies. As will be shown in the subsequent chapters, the method of QCA is particularly suited to gain insights in these multifaceted dynamics of policy change and should deserve further attention in future research in this area.

The paper is structured in the following way: As a starting point, the most important aspects of the recent comparative citizenship literature are discussed critically by looking at the major theoretical arguments as well as empirical findings in greater detail. After introducing the general methodological framework of QCA, the empirical section starts off with a descriptive historical overview of the broader development of citizenship policies in the Western European context.³ In a further step, the QCA method is applied to causally explain expansions and restrictions in the access to national membership for immigrants between 1980 and 2010. By looking at the

³ The sources for the content of national citizenship laws are based on the single case studies that were published in Bauböck et al. (2006) and Hansen, Weil (2001) as well as the so-called country reports edited by the Robert Schuman Centre for Advanced Studies (for further information on the latter see http://eudo-citizenship.eu/).

very diverse empirical cases of Austria, Belgium, Finland, France, Germany, the Netherlands, and Sweden, the focus is less on the emergence of historically different traditions of citizenship laws, but rather on their endurance or modification in the course of diverging legislative terms since the early 1980s.

2. Sociological debates on citizenship and immigration

2.1 Macro-theoretical references

Early theoretical approaches in the field of immigration and citizenship emphatically stressed the importance of historical conceptions of what constitutes national communities in regard to the general configuration of nationality laws. Drawing on the broad literature on nationalism and historical institutionalism, Brubaker (1992) conceptualizes the nation state as being simultaneously internally inclusive and externally exclusive. While modern citizenship regimes denote an equal status for all members of the national community, they also demarcate the status of non-citizens. In this view, sovereign nation states face each other as closed entities, whereby would-be citizens of immigrant origin are particularly targeted by the exclusive rules of national membership. Against this background, Brubaker argues that such modes of social closure are invariably based on particular cultural traditions, so-called 'idioms' of national self-understanding. Accordingly, the contrasting historical roots of national identity in Germany and France have yielded the ideal types of 'ethnic' versus 'civic' citizenship policies. This distinction is specifically pronounced in the intergenerational transmission of national membership and explains the relative predominance of the principles of ius sanguinis ('law of descent') and ius soli ('law of soil'). Of particular importance here is the fact that these citizenship configurations are shaped by underlying path dependencies: Specific traditions of nationhood and national identity that have been established over the course of more than 200 years still explain the implementation of contemporary citizenship laws. Since national modes of immigrant incorporation are thus presented as highly coherent schemes, this analytical approach is very doubtful of profound legal changes that would not correspond to a pre-defined national path. Convergent lines of policy change between nation states are therefore precluded.

While commonly acknowledged as a groundbreaking study in the field of citizenship and immigration, Brubakers' historical-comparative approach has been criticized from various angles. First, considering his focus on abstract notions of nationhood and cultural idioms, political contestations surrounding citizenship rules are notably left out of the analysis. Quite the opposite, interests of involved actors that might diverge as well as contingent power constellations are subordinated to the harmonious nexus between national identity and citizenship laws that exerts a rather deterministic influence. On top of that, the assumption of stable national divergences has been subject to critical scrutiny in the light of recent policy changes, whereby states with famously restrictive citizenship laws, the alleged ideal type of Germany among others, have taken significant steps of liberalization.

In order to go beyond this mono-causal reasoning centered on national paths, and to provide theoretical tools to capture contemporary policy changes more accurately, several authors have shifted the focus to the international dimension of immigrant incorporation, thereby emphasizing the 'postnational' character of modern citizenship regimes (for an overview, see also Mackert, Müller 2007). Since the publication of 'Limits of Citizenship' (1994), Yasemin Soysal is considered as being one of the most prominent proponents of this approach. In her comparative study of Western European modes of immigrant incorporation, Soysal argues that the institution of citizenship has undergone a profound transformation since it is no longer based on exclusive national membership but rather on the concept of 'universal personhood' (ibid.:142) which is firmly embedded in the transnational discourse of human rights. Borrowing her conceptual categories from the neo-institutional version of the world society (Meyer et al. 1997), Soysal sees the notion of universal personhood as a constitutive part of global and highly legitimized cultural rules of the world polity, whereby nation states as the main recipients are expected to implement and further reproduce these abstract norms in local and regional contexts. In line with this, the multi-layered European regime of human rights also incorporates multilateral treaties that, especially since the 1990s, aim at the rights and secure legal status of the individual migrant which in turn has led to a profound 'devaluation' of former national modes of incorporation. While institutional repertoires of nation states continue to be relevant for specific modes of immigrant incorporation, the main point is that membership is no longer tied to particularistic communities. Accordingly, nation states do not act in unrestricted sovereignty, but are fundamentally committed to those legal rules that are specified in multilateral conventions. Hence, deviating ideological orientations among parties would become obsolete in basic questions of immigration politics which opens up possibilities for convergent patterns of liberal policy change across Western European states.

While Soysals' work has to be credited for ambitiously designing a framework that leaves the profound 'methodological nationalism' (Wimmer, Glick Schiller 2003) of Brubaker's work behind, it only offers a first step on the way to a comprehensive multi-level analysis of European citizenship policies. One of the major conceptional gaps concerns the mediation between the national and transnational sphere. In line with broader critiques of the world polity concept (Heintz, Greve 2005: 103), Soysal proclaims a linear and rather smooth implementation of universal legal principles in the national context. Like other advocates of the postnational approach, she does not pay attention to the role played by political actors or civil society in particular national settings. As will be shown in the subsequent chapters, the past decades have witnessed heated debates on citizenship and immigration while policy changes have accordingly moved in various directions. On the other hand, the content of multilateral treaties, though forming a crucial part of the argumentation, remains relatively abstract. While the increasingly secured status of 'the international migrant' is mentioned per se, one looks vainly for a further specification of such rights and particular legal documents. This is quite astonishing given the fact that the European regime of human rights is characterized by a unique degree of diversification as well as institutionalization.

Against this rather ambiguous post-national turn in the literature, more recent theoretical accounts of changes in the citizenship legislation of Western European states put a stronger emphasis on the role played by political actors. Taking the liberal constitution of democratic societies as a background, Joppke (2003) distinguishes between so-called patterns of 'de-ethnicization' and 're-ethnicization' in order to explain citizenship policies in the context of international migration. According to him, the presuming condition for a de-ethnicization of nationality laws in liberal democratic states is the permanent settlement of immigrant populations. Embedded in the postwar context of an international human rights regime, these states are thereby more or less forced to open access to national membership in the course of permanent immigration, especially when the process of nation-building is consolidated. Joppke furthermore argues that the course of policy change is shaped by the interests of political actors, whereby the political left is generally devoted to a liberalization of the access to citizenship and conservative governments introduce restrictive reforms. Overall, this approach opens up a broader comparative perspective on citizenship policies across Western Europe, especially by outlining a multifaceted conglomerate of necessary causal conditions that includes power constellations and actor interests as well.

Yet, there also remain a few ponding questions and inconsistencies. First, while it may be true that left parties more often than their conservative counterparts deploy a liberal citizenship agenda, this part of Joppke's argument is rather unspecified. He simply sketches out the 'universalist vocation' (ibid.: 431) of the political left, but only to leave out further contextual circumstances such as the presence of and interaction with other powerful actors in the political arena. Secondly, the argument that the long-term settlement of non-citizens of immigrant origin *per se* forces national governments to liberalize citizenship laws is quite sketchy. Apparently, postwar migrations in the Western European context were largely based on the premise of economic functionality while questions of political incorporation were rather marginalized at the same time (Koenig 2003: 22). Besides the implicitly tautological reasoning and the fact that no minimum size of this group is mentioned in detail, it is still far from clear why and under what conditions countries of immigration should aim at de-ethnicized citizenship laws.

2.2 Major empirical results and limitations of comparative studies

Whereas the outlined theoretical approaches emphasize several facets of citizenship policies in countries of immigration, the empirical research focusing on Western Europe was for a long time marked by single case studies and the dichotomous comparison of selected states. Only recently has there been an increase of comparative studies that also include more comprehensive samples. The following section gives a short overview of this state of comparative research, thereby pointing out notable limitations and blind spots.

Challenging Brubakers' concept of path dependent cultural idioms and invariable policy formations, Weil (2001) compounds a sample of 25 mostly European nation states to show that there has been a significant liberalization of citizenship legislations since the early 1980s. In particular, the descriptive results illustrate a converging trend of introducing generous ius soli provisions that facilitate citizenship acquisition for the second generation of immigrants, whereas the findings in regard to dual citizenship and naturalization procedures remain rather inconclusive (ibid.: 20-4). Weil argues that this constellation can be explained by three interrelated causal conditions: the very existence of democratic values consolidated state borders and the general self-perception as a country of immigration. In their absence, nation states would be more thoroughly concerned with the legal status of emigrants and deploy the principle of ius sanguinis accordingly. While at a first glance offering an elegant explanation, the study only presents descriptive evidence for partly converging trends of liberalization that cannot serve as a comprehensive causal analysis. Furthermore, Weil is not concerned with political contestations over citizenship reforms which are rather subordinated to the abstract framework of democratic values, stable borders, and national self-understanding. Another limitation lies in the teleological reasoning, whereby it seems to be only a matter of time until modern countries of immigration harmoniously liberalize their citizenship laws in the long run.

In contrast to this very generalizing approach, the historical-comparative research conducted by Howard (2010, 2009) is much more interested in configurations of political power as explanatory factors that shape the timing and outcome of citizenship debates. The historical comparison then focuses in a first step on particularly those European states that were already committed to liberal policies in the early 1980s due to their status as former colonial powers that went along with early processes of democratization in the 19th century. To capture this outcome more systematically, Howard makes use of the 'Citizenship Policy Index' which includes ius soli measures as well as the toleration of dual citizenship and the necessary length of residence in order to be eligible for naturalization. Following this historical starting point, contemporary citizenship laws are basically shaped by public discourses on the incorporation of immigrant populations. Howard claims that enduring restrictions in this area result from the emergence of right-wing parties which are able to successfully mobilize xenophobic sentiments, at times by trumping the liberalizing efforts of leftist governments (Howard 2010: 744). In contrast, the pattern of liberalizing change occurred under those contextual circumstances in which such actors did not play a significant role in the public discourse and the established political parties furthermore reached a seminal consensus.

The explanatory framework employed by Howard opens up a much needed perspective on contingent constellations of political actors in specific national settings. Thereby, it is possible to look at the timing of citizenship change in greater detail. Nevertheless, Howard paints a rather fragmentary picture of national path dependencies. While early policy variations are vaguely explained by a country's colonial history and time of democratization, there seems to be no systematic connection between these traditions and contemporary dynamics surrounding legislative change. Secondly, the particular mechanisms of interaction between radical right-wing parties and their mainstream counterparts are not made explicit. Theoretically as well as empirically, it is not made clear *why* established parties in power should adjust their agenda in the course of far-right electoral success. Furthermore, the contemporary constellations within the allegedly liberal cluster are remarkably left out of the analysis. Given the fact that in the period of investigation, for example, both France and Belgium have witnessed significant right-wing success on the national level leads to the question why these parties were still not able to exert a restrictive influence on the citizenship policy.

One of the few quantitative approaches in the field of citizenship and immigration is the study by Koopmans, Michalowski, and Waibel (2012) who analyze the development of citizenship rights for immigrants in Western European states between 1980 and 2008. Treated as an essential component of this conglomerate of individual and group rights, access to citizenship is again operationalized by the application of ius soli, tolerance of dual nationality, and naturalization requirements. Descriptively, the authors show that in all three areas a poignant process of liberalization took place between 1980 and 2002. From a comparative perspective it also becomes clear that cross-national variations were significantly narrowed down in that period, hence indicating a converging trend across Western European states. Interestingly, for the subsequent period between 2002 und 2008 the authors detect a restrictive turn that is mainly attributed to the widespread adoption of standardized examinations of language skills and country knowledge for newcomers (ibid.: 1223). At the same time, cross-national divergences increase again which generally denotes the reversible character of citizenship change apart from teleological models. Looking at the causal influences of national and international variables on these patterns of change, the multivariate regression analyses reveal the substantial role of path dependencies in explaining why countries adopt rather liberal citizenship laws: If a state displays a greater openness towards immigrants in 1980, it is very likely that this configuration is further kept in place over the next periods (ibid.: 1229). Contrary, other national factors seem to be less influential: While the share of voters with a migration background is loosely related to a higher liberalization, the electoral success of right-wing parties slightly leads to a greater degree of restrictions. Meanwhile, the majority position of left parties in national parliaments remains insignificant. On the international level, EU membership of a state exerts no liberalizing influence on domestic citizenship laws, which is interpreted as a general falsification of the postnational model (ibid.: 1238).

One of the distinguished merits of this study is the broad inclusion of various theoretical approaches that exist within the sociological debate on citizenship and immigration. At the same time, however, mechanisms of interaction between the single variables are not further specified in the quantitative framework which basically targets their average causal influence on the outcome of citizenship rights. This procedure greatly underestimates the dynamics that surround the politics of citizenship, particularly the context-bound interaction between left parties and their right-wing competitors. Here, Koopmans and his colleagues do not pay appropriate attention to contextual circumstances which is further illustrated by a very simplified operationalization of national path dependencies. The somewhat trivial approach of utilizing a country's citizenship laws of 1980 as the explanans for subsequent periods ultimately leads to the result that this variable exerts by far the most significant influence. Finally, another limitation of the study lies in the inadequate operationalization of the postnational approach. Instead of constructing the dichotomous variable EU-membership versus non-membership, a coherent multilevel analysis would have to look at specifically those transnational treaties that deal with the legal status of immigrants since membership in the EU is not per se linked to incentives to liberalize national citizenship laws.

As could be shown in the previous section, the comparative literature of the past decades has yielded important findings with regard to the linkage between citizenship and immigration. However, there remain significant theoretical as well as empirical gaps that mainly arise from a lack of attention paid to power constellations and contextual circumstances of national political settings. Likewise, what is missing from the debates so far is a research design that systematically aims at the interplay between historical citizenship trajectories, interests of political actors, and international legal norms. The following chapters will contribute to the literature by adopting a multi-layered comparative framework for the analysis of postwar citizenship change across Western Europe. Here, the method of Qualitative Comparative Analysis (QCA) is ideally suited to uncover complex causal relationships while at the same time including a broader number of empirical cases.

3. Research design

3.1 Characteristics of Qualitative Comparative Analysis (QCA)

Going back to the pivotal studies by Weber and Durkheim, qualitative comparisons of nation states or societal sub-units have traditionally played a crucial role within the social sciences. Peculiarly interested in unveiling causal inference, they are characterized by their sensitivity towards long-term developments and contextual circumstances while at the same time aiming at broader generalizations (Mahoney 2003: 338-9). In line with this research tradition and in contrast to conventional quantitative designs that usually assume linear patterns of causation among a large number of cases, the method of QCA aims at the detailed comparison of middle-sized case numbers and the explanation of complex causal relationships (Ragin 1987, see also Mahoney, Goertz 2006).

A crucial feature of QCA lies in the systematic differentiation between necessary and sufficient causal conditions. The latter are of particular analytical relevance since they are always related to the occurrence of a specified outcome, independently of the presence of other conditions (Schneider, Wagemann 2007: 32). Conceptually rooted in the logic of Boolean algebra, QCA furthermore pays careful attention to the combination of and interaction between various conditions. By implication, single cases are rather understood as configurations whereby outcomes are yielded by phenomena of conjunctural causation (Ragin 2000). Finally, QCA also takes instances of equifinality systematically into account whereby divergent causal paths may lead to similar outcomes (Mahoney, Goertz 2006: 236).

Originally, applications of QCA were based on so-called crisp sets that distinguish between the presence (full set membership, expressed by the value '1') or absence (full non-membership, value '0') of causal conditions and outcomes. This approach soon evoked strong criticism since most phenomena of the social world are more complex and simply do not fit into a binary logic. Against this background, the elaboration of fuzzy-set-QCA (fsQCA) allows for a more finely graded calibration of research objects (Ragin 2006; Schneider, Wagemann 2012). Based on the principles of set theory, fsQCA is much more nuanced and proceeds from the so-called point of indifference (value '0.5') to demonstrate whether a condition or outcome is *rather* present or absent. This crossover point illustrates the maximum ambiguity regarding whether a case is more 'in' or more 'out' of a particular set. While the extent of gradations between the qualitative anchors of full membership and non-membership is principally left open, the validity of every usage of fsQCA is based on the accurate linkage between the empirical material, underlying concepts, and their translation into precise fuzzy-scores (Schneider, Wagemann 2007: 180). In doing so, one can look at the method as an innovative middle course between the case-oriented logic of qualitative research and conventional quantitative approaches. Accordingly, fsQCA provides an opportunity to analyze citizenship configurations in greater detail by going beyond the dichotomous confrontation of liberal versus restrictive ideal types.

3.2 Operationalization of liberal and restrictive citizenship regimes

As shown above, a number of indicators have been frequently used in the comparative literature to describe the openness of national citizenship laws towards immigrants and their offspring, namely the application of ius soli provisions, the tolerance of dual citizenship, and naturalization guidelines. These standardized rules of governing access to national membership have subsequently been institutionalized in modern nation states and are furthermore recognized principles of international law. From a world polity perspective, they reveal a high degree of legitimacy as well as formal bureaucratization, and therefore are also the focal points of the upcoming empirical analysis.

Starting with the work by Brubaker, the strict implementation of ius sanguinis has been treated as a distinctive feature of restrictive citizenship regimes since the acquisition of a country's citizenship in this case depends on the circumstance that at least one parent also has to be a national of the country (Koopmans 2005: 34-7). At times conflated with an ethnic understanding of nationhood and national belonging, this legal principle has been continuously applied throughout the Western European context since the early 19th century (Weil 2008). Yet, nation states differ in applying subsidiary *provisions of ius soli* which take the place of birth into consideration and might thus facilitate the access to citizenship for second generation immigrants. While usually interpreted as a basic feature of liberal citizenship laws, the practical adoption of ius soli is often bound to certain conditions. Its mere presence should thus not be confused with a generally inclusive appeal, but rather be viewed as a flexible legal mechanism that is embedded in particular national traditions (Joppke 2003: 435-6).⁴

The allegedly liberal character of ius soli is generally complemented by a country's stance on *dual citizenship for immigrants*. Formally defined as the parallel membership in two states, this feature of modern citizenship constellations has long been subject to heated public debates across the Western European context (Faist 2007). Proponents of dual citizenship argue that the classical Westphalian concept of single national membership has lost its justification in the transformative context of global

⁴ Taking the classical confrontation of ius soli and ius sanguinis into account, Ayelet Shachar (2009) convincingly argues that both modes of citizenship transmission actually rely on the ascriptive attribute of birthright. As a consequence, unequal life chances are constantly reproduced by random circumstances that lie beyond individual choice which further trivializes notions of *the* liberal ius soli and *the* restrictive ius sanguinis.

migrations.⁵ It is thereby assumed that the possession of two passports would generally facilitate the political, economic, and social integration into the host society while not discriminating against newcomers in the course of naturalization. As in the case of ius soli, it is important to keep in mind that dual citizenship in most cases is not applied in zero-sum form, but rather allows for a certain degree of flexibility. Accordingly, the upcoming empirical section distinguishes between the implementation de jure and, on the other hand, de facto exemptions that usually target specific subgroups.

Over the past decade, procedures of naturalization have received growing attention in the comparative literature as a third distinctive feature of modern citizenship regimes. Especially the introduction of formalized civic integration programs and underlying connotations of what constitutes membership in the national community have been used in contrasting liberal and restrictive citizenship regimes (for an overview see Goodman 2010 and Michalowski 2011). Whereas citizenship tests are a well-established token of naturalization guidelines in the United States or Australia, they are a relatively new phenomenon in the Western European context. Even though certain language requirements and loosely defined criteria of integration had been utilized in this region as well, they were not formally introduced before the late 1990s. Here, the Dutch Law on Civic Integration (2000) served as a kind of blueprint for the region by governing immigration-related cultural diversity more actively and thereby moving away from the laissez-faire approach to immigrant incorporation that characterized earlier multicultural policies. Of particular importance in this respect is the question whether the proliferation of citizenship tests makes the access to national membership more restrictive and, as a consequence, functions as a further mechanism of social closure. On the one hand, with regard to the examination of language skills of non-citizens, one can make the case that this does not lead to a discrimination of immigrants per se. Language tests might rather serve as a functional component of a neoliberal agenda that aims at the successful socio-economic integration of the individual migrant. Combined with formalized tests on a country's history and

⁵ This argument is also supported by the empirical fact that the transmission of citizenship has successively become gender neutral over the past decades, and a growing number of immigrant children with a binational background are now formally entitled to more than one citizenship. Whereas patrilineal modes of ius sanguinis had traditionally served as the guiding legal norm, the so-called ius sanguinis materni was firmly established in the 1979 *Convention to Eliminate All Forms of Discrimination Against Women* (CEDAW, United Nations 1979) and subsequently institutionalized across Western European nation states (Heinz et al. 2006; Joppke 2010: 48-9).

cultural life, the access to citizenship increasingly depends on human capital and thus implies a selection process in the course of naturalization (Shachar 2006).

Taken together, the fuzzy calibration of the outcome '*liberal citizenship*' stresses the basic complementarity and mutual reinforcement of these substantive features of national citizenship regimes which in turn leads to the qualitative differentiation between rather liberal or rather restrictive ideal types. As Table 1 illustrates, full membership in the cluster of liberal configurations (fuzzy score 1) is bound to the unconditional application of ius soli and dual citizenship, while at the same time measures of civic integration are not part of the naturalization procedure. Overall, this constellation displays the greatest degree of openness towards immigrants and their offspring.

Fuzzy score	Legislative features
1	pure ius soli; full tolerance of dual citizenship; no formal citizenship test
0.8	rather generous application of ius soli <i>and</i> dual citizenship; formal citizenship test
0.6	ius soli and dual citizenship (each significantly conditioned)
0.4	sole application of ius soli or dual citizenship
0.2	ius sanguinis; no tolerance of dual citizenship; no formal citizenship test
0	ius sanguinis; no tolerance of dual citizenship; formal citizenship test

Tab.1: Fuzzy calibration of the outcome 'liberal citizenship'

National policies are also regarded as mainly liberal or rather liberal (fuzzy scores 0.8 and 0.6, respectively) in case a state adopts formalized integration tests or when the practical implementation of ius soli and dual citizenship is subject to various constraints. Most importantly, the crossover point of 0.5 is being undercut when either ius soli or dual citizenship is adopted singularly and there is no mutual reinforcement between those two legislative elements. The arrangement of relying exclusively on ius sanguinis and single citizenship but without similarly adopting civic integration measures is displayed by a fuzzy score of 0.2. The additional application of the latter describes full membership in the ideal type of restrictive citizenship regimes which articulates the highest legal barriers for immigrants. Still, even in this scenario, it is generally possible for immigrants and their offspring to acquire national citizenship despite facing relatively strong obstacles.

4. Citizenship and immigration in Western Europe – Descriptive Results

Following the fuzzy calibration of the multi-layered outcome of liberal versus restrictive citizenship configurations, the empirical part of the paper begins with a descriptive outline of the manifold forms that policy constellations have taken in postwar Western Europe. To a certain degree, this overview allows to define a more general typology of legislative change which challenges contradicting theoretical assumptions of converging trends of liberalization that exist in the comparative literature.

While in terms of citizenship laws and immigration experience Western European countries started from fundamentally different positions at the beginning of the 1950s, there seem to exist four more or less coherent types of policy change that have occurred among nation states since then. A first cluster includes those countries with a pronounced liberal tradition that have not implemented any significant restrictions over time and therefore constantly display a fuzzy score of 0.8 or 1. Specifically, this group consists of France, Ireland (Figure 1), and the UK.

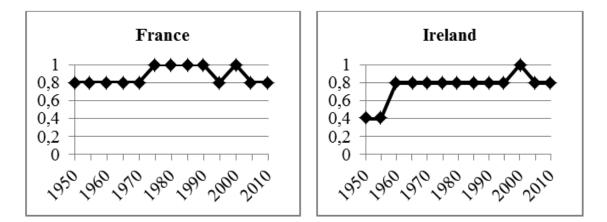


Fig.1: Traditionally liberal regimes without restrictions

While both France and the UK had historically been committed to the principles of ius soli and dual citizenship, the latter was not formally introduced in Ireland prior to 1956. The gradual liberalization of postwar Irish citizenship policies culminated in the so-called 'Good Friday Agreement' of 1998 in which the right to ius soli became a constitutional entitlement, a then unique regulation in the Western European context. By contrast, the previously uncontested usage of ius soli in the UK experienced some restrictions in 1981 when the vague concept of 'patriality' was introduced in various instruments of British migration and citizenship policy. According to this,

at least one parent had to be a British citizen or possess an unrestricted residence permit in order to make use of the ius soli provisions, thereby implying a slight accentuation of ius sanguinis. Meanwhile, in the period of investigation France has not departed from the national path of liberal citizenship laws. Yet, political contestations over the traditionally generous of ius soli clearly intensified in the course of the 1990s whereby its application became particularly restricted for the children of Algerian immigrants. This, however, proved to be a short-term measure after the newly elected socialist government went back to an unconditional ius soli in 1997. Formal measures of civic integration were introduced in the French context in 2005 which is illustrated by the fuzzy score being reduced to 0.8.

In contrast to this cluster of rather coherent policy regimes stands a second group of traditionally restrictive countries that have adopted meaningful liberal reforms in the past decades and thereby surpassed the critical fuzzy point of 0.5. This pattern of change is illustrated by the cases of Belgium, Finland (Fig.2), the Netherlands, Portugal, and Greece.

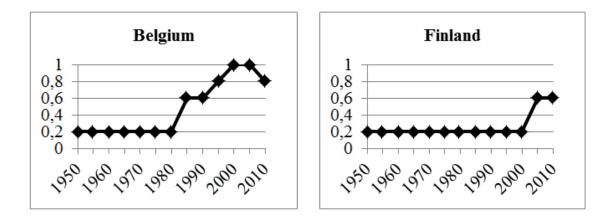


Fig.2: Liberal change in traditionally restrictive regimes

Compared to the first cluster, this group of states is rather heterogeneous in terms of timing and direction of liberalizing change. This tendency of greater openness towards immigrants was highly pronounced in Belgium by introducing full dual citizenship in 1984. While this was initially accompanied only by the so-called double ius soli for the third generation of immigrants, complementary reforms in the late 1990s extended ius soli to the children of immigrants as well. In contrast to the classification by Howard (2009), who assigns Belgium to the cluster of traditionally liberal regimes, the fuzzy scores indicate that liberalizing shifts in this case have rather been a recent phenomenon. In a similar vein, Greece, Finland, and Portugal have

lately facilitated the access to national membership mainly by completely tolerating dual citizenship. The Dutch case, on the other hand, illustrates the contingency and reversible character of citizenship change. After generally approving dual citizenship for immigrants in 1994, restrictive reforms only three years later confined its toleration to limited segments of the population, mainly Moroccans and EU citizens.

A third type of legislative change is observable in Germany, Sweden (Fig.3), Italy, Spain, and Switzerland. Similar to the previous cluster, these countries have a strong tradition of ius sanguinis and single citizenship. During the postwar era, however, they have commonly added liberal features only to some extent and thus remain permanently below the threshold of 0.5. An illustrative case in this regard is Germany. Despite aiming at extensive citizenship reforms after winning the 1998 election, the coalition government of Social Democrats was forced to a compromise by the conservatives and thus introduced only the so-called optional model of dual citizenship in 2000 as well as a conditioned version of ius soli. Even though this still represents a shift in comparison to earlier constellations, an albeit modified restrictive configuration was kept in place since not all immigrants are fully entitled to dual citizenship, especially those of Turkish origin who have to opt for one citizenship at the age of 23.

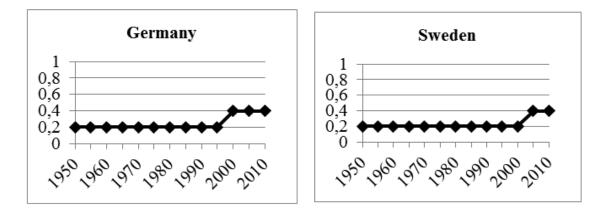


Fig.3: Partially liberal change in traditionally restrictive regimes

In a similar vein, the partial implementation of dual citizenship in Spain is traditionally bound to bilateral treaties with certain countries. On the other hand, Italy, Sweden, and Switzerland, while fully tolerating dual citizenship, still rely exclusively on the principle of ius sanguinis which is not relinquished even in the course of permanent immigration in all countries.

Finally, Austria, Denmark, (Fig.4) and Norway represent the ideal type of constantly restrictive citizenship regimes which have not even adopted minor liberal reforms in the postwar era. Accordingly, the exclusive application of ius sanguinis and single citizenship without notable de facto exemptions still go hand in hand which is displayed by the maximum fuzzy score of 0.2.

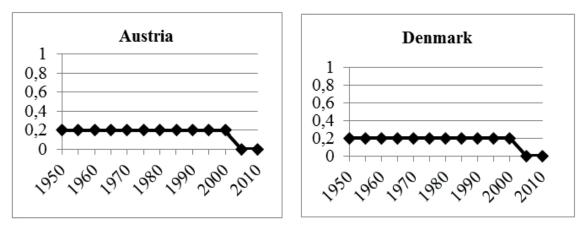


Fig.4: Traditionally restrictive regimes without liberal change

A high degree of consistency within this cluster is further highlighted by the fact that all three countries have adopted civic integration measures in the past decade. In this respect, the Danish approach of testing would-be citizens in the naturalization procedure particularly targets low-qualified immigrants and can thus be interpreted as an additional barrier that expresses anxieties about certain forms of unwanted immigration. Given the momentum of formal civic integration policies among these states, they contemporarily demonstrate full membership in the ideal type of restrictive regimes.

The descriptive findings of the previous section have yielded no empirical evidence for a uniform trend of liberalization across Western European states. In other words, citizenship policies are still firmly embedded in heterogeneous national contexts and show a great degree of variation. This necessarily contradicts strong theoretical assumptions of long-term convergences. What follows from the descriptive overview is rather the picture of a growing diversification of citizenship policies. While many states have successively adopted a rather liberal stance on dual citizenship, they widely differ in the adoption of complementary ius soli provisions. Against this background of ongoing legislative change, there is also no empirical support for the claim of a 'devaluation' of citizenship in the context of a transnational human rights discourse. Likewise, the results suggest that citizenship policies do not simply follow predefined national paths of immigrant incorporation. This finding stands in stark contrast to Brubakers notion of static cultural idioms and their constant influence on legal arrangements. Hence, a more comprehensive empirical analysis has to further elaborate on the specific causal conditions of policy change in order to explain why certain countries have added liberal citizenship elements while others have not.

5. Causal analysis of Western European citizenship regimes

After the descriptive results have revealed the picture of an evident diversification of citizenship policies across Western European states, the upcoming section introduces the fuzzy calibration of the causal factors that could explain these constellations. Incorporating a multilevel comparative framework, the focus hereby lies on national as well as international conditions. Following this, the results of the QCA analysis are presented for liberal as well as restrictive citizenship regimes.

5.1 National and international causal conditions

On the national level, it is pertinent to reflect on the political dynamics that necessarily surround the implementation of new citizenship laws. In line with the abovementioned argument by Joppke, the political left in particular should support a 'de-ethnicization' of access to national membership. While Joppke ascribes this mainly to their 'universalist vocation', it is necessary to keep in mind that these parties might also put liberal citizenship laws on their agenda in order to gain electoral votes. Previous studies were able to show convincingly that left parties, in contrast to their conservative counterparts, have a significantly higher share of voters among people with a migration background (see for example Strijbis 2014; Saalfeld 2011; Givens, Luedtke 2005). Since the right to vote is usually tied to the possession of national citizenship, the political left might therefore put the dismantling of restrictive legal constellations on her agenda or carry on an already existing liberal path. In either case, instrumental power concerns need to be taken into account next to an allegedly universalistic ideology. In regard to the fuzzy calibration of left-wing incumbency ('leftgov'), a score of 1 indicates a strong parliamentary majority of left parties in a given legislative term, while a score of 0 signals a clear minority. Likewise,

the cut-off point of 0.5 is guided by the question whether left parties hold the position of being the major or minor partner in coalition governments.⁶

In relation to this, the national condition *'immigrantvote'* is based on the share of the electorate with a migration background in national elections (Tab.2). Whereas immigrants have so far been notably excluded from comparative citizenship studies or have been, at best, conceptualized as playing a rather passive role in the national political arena, the QCA method allows for detecting potential interaction effects between the positioning of left parties on the one hand and the political participation of immigrants on the other. In view of this, the electoral behavior of immigrants has the potential to considerably impact national political discourses and political parties may become more inclined to their interests (Strijbis 2014). Numerically, the following calibration departs from the assumption that a share of 5% of the total electorate signals a rather existing potential for shaping the outcome of national policies in case immigrants would vote uniformly. Thus, the score of 0.5 is surpassed for the first time when at least 5% of the electorate has a migration background.

Fuzzy score	Voters with a migration background (national elections)
1	9,5% and more
0.8	7,5-9,0%
0.6	5,0-7,0%
0.4	3,5-4.9%
0.2	1,5-3,0%
0	1% or less

Tab. 2: Fuzzy	calibration	of the	condition	'immigrantvote'	*
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* Source: Koopmans et al. 2012, see Appendix Tab.A1.

Looking at the opposite end of the political spectrum, recent comparative research has consistently included the mobilization of radical right-wing parties that may trump the liberalizing efforts of left-leaning governments. Since the early 1980s, the

⁶ Here, the calibration follows the information provided by the Comparative Political Data Set (Armingeon et al. 2011) as well as the Comparative Manifesto Project (Budge et al. 2001) which both have been established as reliable sources on the constitution of national political systems.

'new' radical right has emerged as a steady component of the Western European political landscape (for an overview see Stöss 2006, and Minkenberg 2001). Despite varying electoral success across national contexts, the ideological repertoire of these parties usually consists of a stringent nationalist agenda that rejects any form of ethnic pluralization (Kitschelt 2007). In this sense, the modern institution of citizenship serves as an expression of the national ethnic identity and thus access is supposed to be restricted for immigrant newcomers. Radical right-wing parties thereby utilize migration and integration policies as an instrument of electoral competition, whereby these new lines of cleavage refer to issues of national belonging that are instrumentalized next to traditional issues of socio-economic conflict. On top of that, their populist agitation is often directed against political elites as well as supranational institutions. In sum, it can be expected that the radical right threatens domestic citizenship policies under specific circumstances that are shaped by the interaction with established political actors. Accordingly, the fuzzy calibration of the causal condition 'rightradical' is based on their success in national elections (Tab.3). Again, the critical score of 0.5 is exceeded when these parties gain at least 5% of the votes in national elections and therefore constitute a substantial force in the political arena.

Fuzzy score	Share of votes for radical right-wing parties in national elections
1	9,5% and more
0.8	7,5-9,0%
0.6	5,0-7%
0.4	3,5-4.9%
0.2	1,5-3,0%
0	1% or less

Tab.3: Fuzzy calibration of the condition 'rightradical'*

*Sources: Stöss 2006: 549; Lochocki 2012: 31 (for an overview see Appendix Tab. A2)

Finally, the causal analysis also considers historical path dependencies as another condition located on the national level. In contrast to the rather simplified approach by Brubaker, a more comprehensive definition of path dependencies points at "specifically those historical sequences in which contingent events set into motion institutional patterns or event chains that have deterministic properties" (Mahoney 2000:

507). To describe patterns of their institutional reproduction in greater detail, it is possible to distinguish between various mechanisms. An institutional feature can be kept in place even in light of critical voices either when a powerful elite group benefits from the existing arrangements and is capable to secure their reproduction, or, secondly, when involved actors believe in their legitimacy. In any case, political debates surrounding citizenship reforms are likewise struggles over the legitimate interpretation of national legal traditions that cannot simply be traced back to abstract cultural understandings of nationhood (Gosewinkel 2001: 48). Of particular importance in both scenarios is the probalistic nature of path dependent constellations: Traditional institutions might be steadily locked in even under varying contextual circumstances but their reproduction never occurs in isolation from political contestations. Critical junctures for significant change of integration policies might occur when new governments with varying ideological or strategic orientations take office. In this sense, a citizenship regime can be classified as path dependent when there is no substantial change over the course of numerous legislative terms. Following this, the fuzzy calibration of 'libpath' looks at the degree of policy variations in the course of three subsequent government formations and oscillates between the ideal types of strong liberal and restrictive pathways (scores 1 and 0, respectively).

In addition to this conglomerate of national conditions the multilevel analysis also incorporates two factors that are situated on the international level, namely the ratification of multilateral treaties and, on the other hand, eventual influences exerted by cross-national diffusion processes.

As outlined above, the postnational conception of citizenship employed by Soysal argues that the premise of 'universal personhood' is firmly anchored in multilateral treaties that explicitly aim at the legal status of the individual migrant. Especially since the 1990s, these documents embody shared normative commitments that would eventually pull countries to a broader liberalization of domestic citizenship laws. Looking at the historical context of Western Europe in more detail, the 1930 'Convention on Certain Questions Relating to the Conflict of Nationality Law' illustrates the first organizational attempt to regulate issues of national belonging on the international level. Firmly rooted in the legacy of the Westphalian system of nation states, it basically assures each signatory state the sovereign right to decide on the criteria of national membership while at the same time calling for the general avoidance of multiple citizenships. In the course of intensifying postwar migrations this principle was formally retrieved in the 1963 'Convention on the Reduction of Cases of Multiple Nationality'. Mainly guided by security concerns and carried by a broad consensus

among Western European states this treaty further claims that naturalized immigrants are generally not supposed to retain the citizenship of their country of origin. By contrast, the 1990s witnessed a pronounced change in the normative framework of transnational guidelines on citizenship. Firstly, the 1963 text was largely amended thirty years later by advising states to insure dual citizenship in cases of permanent settlement. Secondly, the 1997 'European Convention on Nationality' further aims at a facilitated access to national membership for immigrants of the second generation by adopting ius soli provisions. Thereby, the documents of 1993 and 1997 for the first time accentuated those individual rights for immigrants that also lie at the very core of Soysals' argumentation. At the same time, however, states remain sovereign in selecting criteria that regulate access to and loss of national membership, even in light of a post-Westphalian discourse of transnational legal norms. Accordingly, the appropriate fuzzy calibration of the condition 'intlaw' avoids an overestimation of the causal influence of those multilateral 'soft laws'. The highest value is 0.6 in case a state has ratified both documents of 1993 and 1997 and is therefore considered to be rather open towards the liberalizing influence of transnational legal norms (for an overview of ratifications see Appendix Tab.A3).

Next to the potential effects of multilateral treaties, it is also plausible to think of nation states informally modelling their citizenship laws after particular arrangements in neighboring countries. Here, one would rather look at the eventual dominance of a particularly liberal or restrictive citizenship regime across the Western European context instead of the codification of formal incentives for policy change. These processes of diffusion, generally understood as "the socially mediated spread of policies across and within political systems" (Knill 2005: 766), operate on the horizontal level without any form of supranational coordination. Rather, institutional change in one country is expected to increase the likelihood of similar developments in other national contexts. From a functional point of view, national governments might emulate neighboring citizenship policies in case of profound uncertainties. For example, states that traditionally exhibit restrictive laws could in the course of permanent immigration look for exemplary liberal reforms that have taken place in other countries under similar conditions, thereby inducing convergent patterns of policy change. On the other hand, nation states might imitate liberal citizenship laws for normative reasons when permanent restrictive arrangements become increasingly delegitimized. Following this, the fuzzy set of 'libdiffusion' aims at the salience of liberal and restrictive citizenship reforms Western Europe. The calibration for a given point in time is based on the average scores of the outcome 'liberal citizenship'

that emerge in the course of policy changes among all Western European states and might serve as a point of orientation for national governments.

After the descriptive section of the paper highlighted a growing diversification of Western European citizenship policies over the past decades, the empirical study explores the developments in the following seven cases that in turn are divided into multiple legislative periods: Austria, Belgium, Finland, France, Germany, the Netherlands, and Sweden. The heterogeneity of this sample in regard to policy outcomes as well as to the various conditions is clearly evident and should in turn ensure the robustness of the empirical findings. Since the direction of policy change differed substantially between these countries, methodological pitfalls of a selection bias can thus be ruled out. The respective fuzzy scores of the causal conditions and the outcome as well as the negated outcome ('restrictive citizenship') are listed in Tab.4. In line with previous comparative studies the analysis covers the constellations between 1980 and 2010. By conceptualizing legislative terms as critical junctures of policy change, causal conditions of the steady persistence of citizenship regimes that do not change are explored as well. In sum, the sample includes a total number of 47 legislative periods among the seven countries.

Bedingungen						outcome		
<u>Land, Legis-</u> laturperiode	leftgov	right radical	libpath	immi- grant vote	intlaw	libdiffu- sion	liberal citizen- ship	~liberal citizen- ship
AUT								
1979-83	0.8	0.2	0	0	0.2	0.4	0.2	0.8
1983-86	0.6	0.6	0	0.2	0.2	0.4	0.2	0.8
1986-90	0.6	0.8	0	0.2	0.2	0.4	0.2	0.8
1990-94	0.4	1	0	0.2	0.2	0.4	0.2	0.8
1995-99	0.4	1	0	0.4	0.2	0.6	0.2	0.8
1999-2003	0.2	1	0	0.4	0.4	0.6	0.2	0.8
2003-07	0.2	0.8	0	0.6	0.4	0.6	0	1

Tab. 4: Overview fuzzy scores

1981-85 0.2 0 0 0.2 0.4 0.6 0.4 1987-91 0.6 0.2 0.6 0.2 0.2 0.2 0.8 0.2 1991-95 0.6 0.6 0.6 0.4 0 0.6 0.8 0.2 1995-99 0.6 0.8 0.8 0.4 0 0.6 0.8 0.2 1999-2003 0.8 0.8 0.8 0.6 0 0.6 1 0 2003-07 0.6 0.8 1 0.8 0 0.6 0.8 0.2 2007-10 0.4 0.8 1 0.8 0 0.6 0.8 0.2 0.4 0.2 0.8 0.2 0.8 0.2 0.8 0.2 0.8 0.2 0.8 0.2 0.8 0.2 0.8 0.2 0.8 0.4 0.2 0.8 0.4 0.2 0.8 0.4 0.2 0.8 0.4 0.8 0.2	BEL								
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2003-07 0.8 0.2 0.6 0.2 0.4 0.6 0.6 0.4 FRA 1981-86 0.8 0 0.8 0.4 0.2 0.4 1 0 1981-86 0.8 0 0.8 0.4 0.2 0.4 1 0 1983-93 0.6 0.8 1 0.6 0.2 0.2 1 0 1993-97 0.2 1 1 0.6 0.4 0.6 0.8 0.2 1997-2002 0.8 1 0.8 0.8 0.4 0.6 1 0 2002-07 0.4 1 0.8 0.8 0.4 0.6 1 0 1983-87 0.2 0 0 0.2 0.4 0.2 0.8 1987-90 0.2 0.2 0 0 0.2 0.4 0.2 0.8 1994-98 0.2 0.2 0 0.2 0.4 0.8	1995-99	0.6	0	0	0	0.2	0.6	0.2	0.8
FRA 0.8 0 0.8 0.4 0.2 0.4 1 0 1981-86 0.8 0 0.8 0.4 0.2 0.4 1 0 1988-93 0.6 0.8 1 0.6 0.2 0.2 1 0 1993-97 0.2 1 1 0.6 0.4 0.6 0.8 0.2 1997-2002 0.8 1 0.8 0.8 0.4 0.6 1 0 2002-07 0.4 1 0.8 0.8 0.4 0.4 0.8 0.2 GER	1999-2003	0.8	0	0	0.2	0.4	0.6	0.6	0.4
1981-860.800.80.40.20.4101988-930.60.810.60.20.2101993-970.2110.60.40.60.80.21997-20020.810.80.80.40.6102002-070.410.80.80.40.40.80.2GER1983-870.20000.20.40.20.81990-940.20.20000.20.40.20.81994-980.20.2000.20.40.20.81998-20020.80.20.20.40.80.40.62002-050.80.20.20.20.40.80.40.6	2003-07	0.8	0.2	0.6	0.2	0.4	0.6	0.6	0.4
1981-860.800.80.40.20.4101988-930.60.810.60.20.2101993-970.2110.60.40.60.80.21997-20020.810.80.80.40.6102002-070.410.80.80.40.40.80.2GER1983-870.20000.20.40.20.81990-940.20.2000.20.40.20.81994-980.20.2000.20.40.20.81998-20020.80.200.20.40.40.62002-050.80.20.20.20.40.80.40.6	FRA								
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1987-900.200000.20.20.20.81990-940.20.20.2000.20.40.20.81994-980.20.2000.20.60.20.81998-20020.80.200.20.40.40.62002-050.800.20.20.40.80.40.6	GER								
1990-940.20.20.2000.20.40.20.81994-980.20.2000.20.60.20.81998-20020.80.200.20.40.80.40.62002-050.800.20.20.40.80.40.6	1983-87	0.2	0	0	0	0.2	0.4	0.2	0.8
1994-980.20.2000.20.60.20.81998-20020.80.200.20.40.80.40.62002-050.800.20.20.40.80.40.6	1987-90	0.2	0	0	0	0.2	0.2	0.2	0.8
1998-20020.80.200.20.40.80.40.62002-050.800.20.20.40.80.40.6	1990-94	0.2	0.2	0	0	0.2	0.4	0.2	0.8
2002-05 0.8 0 0.2 0.2 0.4 0.8 0.4 0.6	1994-98	0.2	0.2	0	0	0.2	0.6	0.2	0.8
	1998-2002	0.8	0.2	0	0.2	0.4	0.8	0.4	0.6
2005-09 0.4 0.2 0.2 0.2 0.4 0.6 0.4 0.6	2002-05	0.8	0	0.2	0.2	0.4	0.8	0.4	0.6
	2005-09	0.4	0.2	0.2	0.2	0.4	0.6	0.4	0.6

Bedingungen							outcome		
<u>Land,</u> Legislatur- periode	leftgov	right radi- cal	lib- path	immi- grant vote	intlaw	libdif- fusion	liberal citizen- ship	~liberal citizen- ship	
NL									
1982-86	0.2	0	0.2	0.4	0.2	0.4	0.4	0.6	
1986-89	0.2	0	0.2	0.6	0	0.4	0.4	0.6	
1989-94	0.4	0	0.2	0.6	0	0.4	0.6	0.4	
1994-98	0.6	0.2	0.4	0.8	0.4	0.6	0.4	0.6	
1998-2002	0.6	0	0.2	0.8	0.6	0.6	0.4	0.6	
2002-06	0.2	1	0.2	1	0.6	0.6	0.4	0.6	
2007-10	0.4	0.4	0.2	1	0.6	0.6	0.4	0.6	
SWE									
1982-85	0.8	0	0	0.2	0.2	0.4	0.2	0.8	
1985-88	0.6	0	0	0.4	0.2	0.4	0.2	0.8	
1988-91	0.6	0	0	0.4	0.2	0.2	0.2	0.8	
1991-94	0.2	0.6	0	0.6	0.2	0.6	0.2	0.8	
1994-98	0.6	0.2	0	0.6	0.2	0.6	0.2	0.8	
1998-2002	0.6	0	0	0.8	0.4	0.6	0.4	0.6	
2002-06	0.6	0.2	0.2	1	0.4	0.6	0.4	0.6	
2006-10	0.4	0.4	0.2	1	0.4	0.6	0.4	0.6	

Tab.4: Overview fuzzy scores (cont.)

5.2 Causal conditions of liberal citizenship regimes

Based on these national configurations, the following QCA analysis looks at the necessary as well as sufficient conditions that explain liberal and restrictive citizenship laws.⁷ In a first step, Tab.5 shows the consistency scores of necessary conditions for the outcome of rather liberal citizenship laws. According to Ragin (2006: 293), a minimum value of 0.8 generally indicates that a subset relation in the configuration under study exists and the presence of a condition can be considered as being necessary.

⁷ All empirical results are based on the application of the computer software fsQCA 2.5 (Ragin, Davey 2009).

Condition	Consistency
leftgov	0.79
libdifussion	0.77
libpath	0.70
immigrantvote	0.65
~rightradical	0.63
intlaw	0.52
libpath*~rightradical	0.93
leftgov*libpath	0.89
leftgov*immigrantvote	0.88

Tab.5: Necessary conditions for the outcome 'liberal citizenship'

It quickly becomes clear that none of the included conditions is solely necessary. While left party incumbency as well as a liberal tradition tend to be important factors, it is quite interesting that the absence of radical right-wing parties does not seem to be necessary for rather liberal citizenship laws. In this regard, one can, for example, think of the French case where a liberal regime was kept in place despite the steady success of the Front National. Likewise, liberal reforms were introduced in Belgium even though the populist Vlaams Blok (later: Vlaams Belang) firmly established itself in the national political arena. By contrast, neither international treaties nor cross-national interferences by ways of diffusion seem to be necessary for the liberal arrangement of domestic citizenship laws.

Meanwhile, various combinations of national conditions reveal high consistency scores: On the one hand, traditions of liberal citizenship policies are mostly kept in place when there is no right-wing mobilization or when there are left-leaning parties in power. A high share of voters with a migration background also constitutes a necessary condition, but only in conjunction with a left government.

As these results offer a first step of the causal analysis, the following section looks at configurations that sufficiently explain liberal citizenship policies. In the QCA framework, this is based on the so-called truth table in which all logically possible combinations of the included conditions are listed. Here, the truth table consists of 64 'ideal types' and also shows which empirical cases can be explained by them (Appendix Tab.A4). Accordingly, the test for sufficiency points to the following conditions whereby according to the logic of Boolean algebra combinations are illustrated by a '*' ('and'), additions by a '+' ('or'). Overall, this result is a typical QCA solution: Across the Western European context, various causal paths lead to rather

liberal citizenship configurations which points to a high degree of causal asymmetry and equifinality. In sum, the four sufficient causal conjunctions show a rather high level of consistency (0.87), while almost three quarters of the variation among all cases is explained by this solution term (coverage of 0.79).⁸ Tab.A5 in the appendix lists the highest score of membership in the sufficient causal paths for each legislative period.

libpath * leftgov * (immigrantvote + ~rightradical) + libpath * immigrantvote * libdiffusion + ~rightradical * immigrantvote → *liberal citizenship* <u>coverage: 0.79; consistency: 0.87</u>

Looking at the solution terms in more detail, a liberal tradition seems to be the most important condition for citizenship constellations that are rather open towards immigrants. But in contrast to the argumentation by Brubaker and the findings presented by Koopmans et al. (2012), these paths only serve as the context for political contestations over citizenship laws: Left governments maintain these traditions in case there is a large share of immigrant voters or when there is no strong right-radical mobilization. Both conjunctions follow theoretical expectations and are almost perfectly consistent with the outcome (score of 0.96, Tab.A5). Empirically, they explain the configurations in France and Belgium in particular, whereby a strong liberal path centered around the core of dual citizenship and ius soli is kept in place (France), or a short-term liberalization is further institutionalized (Belgium) under varying contextual circumstances.

At the same time, the volatile policy change in the Netherlands during the 1990s which was accompanied by a pronounced instrumentalization and politicization of citizenship attribution can be explained by the causal conjunction of a high share of immigrant voters and the absence of a strong radical right. Even without the existence of a liberal citizenship path it was the coalition of Christian Democrats and the Labour Party that implemented the full, though only temporary, toleration of dual

⁸ With regard to the truth table, the researcher generally has to make the choice about which logical combinations of conditions are connected with the occurrence of the outcome. A common strategy suggested in the QCA literature is to look for so-called gaps of consistency. Here, the cut-off point is 0.902 since there is a significant distance to the next configuration (0.852).

citizenship. Yet, this configuration shows a significantly lower consistency in comparison to both previous conjunctions (0.74).

Meanwhile, causal factors located on the international level are supposedly less influential: Processes of diffusion might promote liberal citizenship laws, but only at the prerequisite of a left majority in national parliaments and an already existing liberal path. Even less important is the ratification of rather liberal multilateral treaties, which is entirely absent from the sufficient solution terms.

In order to further illustrate the high consistency of the overall results, Fig.5 relates the highest membership score in the sufficient conditions to the outcome score for all cases. Generally, one can speak of a perfectly sufficient solution when all empirical cases are aligned above the diagonal axis and approximate the top right corner (each membership score equals 1).

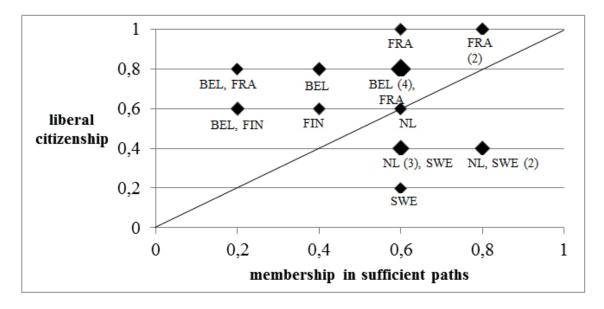


Fig.5: Highest membership in sufficient causal paths ('liberal citizenship')

Here, the XY-scatterplot points to the quasi-sufficiency of the solution terms since only a minority of cases mark outliers, in particular the configurations in Sweden and the Netherlands. Even though these cases displayed favourable contextual conditions for a further liberalization, in particular the combination of a large share of voters of immigrant origin and a weak radical right, unobserved factors prevented them from crossing the critical score of 0.5 which in turn points to the need of more detailed case studies in the future. From a comparative perspective, the scatterplot also highlights the benefit of not contrasting nation states as supposedly coherent units over a longer period of time, but in the light of variances between legislative terms to focus on the short-term dynamics of citizenship change.

5.3 Causal conditions of restrictive citizenship regimes

Corresponding to the various steps in the previous section, the following part examines those causal configurations in which states restrict the access to national membership for immigrants. Firstly, Tab.6 lists the consistency scores for necessary conditions.

Condition	Consistency
~libpath	0.98
~intlaw	0.95
~immigrantvote	0.77
~leftgov	0.74
~libdiffusion	0.71
rightradical	0.38
~leftgov*~libpath	0.99
rightradical *~libpath	0.99

Tab.6: Necessary conditions for the outcome 'restrictive citizenship'

Here, the results point to certain conditions that are almost always necessary for rather restrictive policies. In particular, the existence of a restrictive path, exemplified by the stringent application of ius sanguinis and single citizenship, is nearly perfectly consistent with this outcome. Looking at the sample of Western European states, this constellation is coherently displayed by Austria, Germany, and Sweden. Furthermore, the high consistency score for the rejection of multilateral treaties is quite striking but has to be interpreted cautiously. In this regard, nation states had no opportunity to ratify rather liberal documents prior to the 1990s. The subsequent analysis thus has to further elaborate on the question whether this finding detects a causal influence or more likely displays time effects. Meanwhile, no other single condition seems to be necessary. This is quite striking for the presence of strong radical right-wing parties, whereas rather conservative governments and a relatively low share of immigrants are almost necessary. Furthermore, the combination of restrictive citizenship trajectories with either conservative governments or successful rightwing parties is clearly a necessary precondition.

Based on the truth table for the outcome of rather restrictive citizenship policies (appendix Tab.A6), the sufficiency test again highlights the importance of national traditions in explaining the outcome:

~libpath*~leftgov * (~immigrantvote + intlaw) + ~libpath*~rightradical * leftgov + → restrictive citizenship

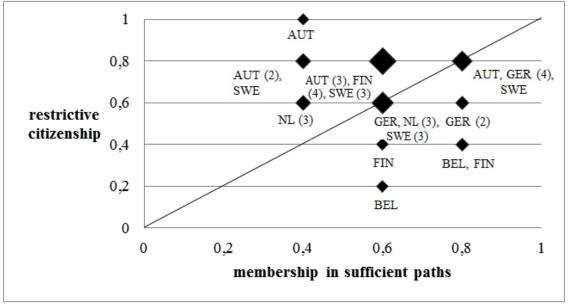
coverage: 0.87; consistency: 0.90

According to this, these trajectories form the contextual framework for various political settings that in most cases lead to rather restrictive policies: Either in conjunction with a parliamentary majority of conservative parties and a low share of voters with a migration background, or, on the other hand, in the absence of successful radical right-wing parties when left parties simultaneously hold a strong position in national governments. The first configuration particularly explains the Austrian cases over the course of the 1990s (see appendix Tab.A7 for the membership score of each legislative period) when the restrictive tradition was firmly maintained by the Christian Democrats. In a similar vein between 1983 and 1998, the powerful coalition of Christian parties and Liberals in Germany held on to restrictive citizenship laws. In a different way, the sufficient conjunction that notably includes a left parliamentary majority explains why Sweden maintained a restrictive legislation over a longer period of time. Here, the Social Democrats as the traditional governing party of the postwar era kept this constellation in place while at the same time not having to consider the interests of immigrant voters or, with the exception of the early 1990s, the threat posed by right-radical competitors.

In stark contrast to the argumentation by Howard, no sufficient causal path includes a pronounced anti-immigrant mobilization epitomized by the far right. This could also help to understand why left governments generally maintain restrictive policy traditions when political issues of citizenship and immigration do not become a salient feature of public debates and there is no need for left parties to position themselves accordingly. In any way, a simple reference to the aforementioned 'universalist vocation' of the political left underestimates their permanent embeddedness in particular political settings. To further illustrate this point, one only has to look at the case of Germany between 1998 and 2005 where the left government was forced to

compromise on key elements of the proposed citizenship reforms in light of a massive counter-mobilization by the Christian parties who in a way balanced the absence of far right parties in the national political arena. Here, a theoretical specification of the path dependency model also offers further insights. In their public agitation, the established conservative parties systematically referred to the ideological and institutional repertoire of traditionally restrictive citizenship policies in order to win the state election in Hesse and to subsequently secure a powerful position in the Upper Parliament (Bundesrat). Given the contingent timing of this consequential election, it is possible to sketch a strong counterfactual picture for Germany which implies the rise into the cluster of liberal states instead of only implementing the optional model of dual citizenship. Instead, the actual development of German citizenship policy resembles a paradigmatic case of institutional layering, whereby specific legislative elements were added to permanent policy features (Beyer 2006).

Another sufficient configuration includes the orientation towards rather liberal multilateral treaties by conservative governments. This combination trivializes the high consistency score which was earlier presented for '~intlaw' and implies that the ratification of these treaties might as well happen for symbolic reasons. In that sense, and contrary to the abovementioned postnational reasoning, the regulation of access to national membership remains a sovereign prerogative and governments of varying ideological backgrounds keep restrictive policies in place despite changing international norms.



Looking at the scatterplot that illustrates the consistency of the overall solution

Fig.6: Highest membership in sufficient causal paths ('restrictive citizenship')

In particular, the solution terms account for numerous legislative terms in Austria, Germany, and Sweden. As in the previous section, a great extent of equifinality could be demonstrated in the comparison of states as well as between different national legislations over time. Yet, further studies should also be concerned with the cases of Belgium and Finland where meaningful liberal reforms were enacted despite contextual circumstances that usually favour the maintenance of restrictive traditions. Moreover, the empirical findings make clear that the causal routes to restrictive citizenship policies are self-sufficient configurations and should thus not be construed as absent liberalizations. Against this backdrop, future comparative research should likewise put a greater emphasis on their specific causes instead of deploying teleological frameworks of liberal trends. Here, by underlining the importance of national contextual circumstances, particularly in relation to the positioning of left parties, the QCA results might serve as a guiding point of reference.

6. Concluding remarks

This paper has addressed fundamental questions of how Western European nation states govern immigration-related diversity from a historical-comparative perspective. Conceptually, the modern institution of citizenship was thereby employed as a 'Janus-faced' phenomenon evoking both inclusionary and exclusionary practices that specify membership terms in a given state. While the major theoretical debates in the field, most notably epitomized by the work of Brubaker, Soysal, and Joppke, have yielded important insights into the multifaceted dynamics of citizenship and immigration, they have so far not been brought together in a coherent research design which incorporates national policy traditions next to the role played by political actors and changing international legal norms. Likewise, previous empirical studies have faced a number of limitations mainly by accentuating single causal factors and, on top of that, by not applying a systematic comparative framework.

Opposed to that, the empirical section of the paper has used to method of fuzzy set Qualitative Comparative Analysis (fsQCA) for the purpose of approaching the empirical puzzle of why some Western European states facilitate the access to national membership for immigrants while others permanently rely on restrictive policies. Balancing the strengths of single case studies and statistical analyses, fsQCA

is thereby particularly suited for detecting instances of conjunctural causation and equifinality. Here, the empirical results point to the importance of contingent political contestations that, against the contextual backdrop of particular legal traditions, produce specific outcomes of citizenship policy change: Traditionally liberal policies are mainly kept in place by the interaction between left government participation, a considerable share of voters with a migration background, and the absence of radical right-wing mobilization. In regard to rather restrictive constellations, it could be demonstrated that conservative as well as left governments maintain such policy traditions, whereas the success of radical right-wing parties apparently plays a less important role in these constellations. Contrary to the shortcomings of earlier theoretical approaches that assume a more or less uniform stance on citizenship employed by left and right-wing parties across countries, the QCA results illustrate that political actors are always embedded in contextual circumstances of citizenship traditions and power constellations which in turn shape the outcome of policy change. In sum, the QCA results made clear that domestic citizenship laws are still very much a sovereign domain of modern states. The multilevel analysis yielded no empirical support for the argument that citizenship has become a postnational phenomenon: Neither the ratification of increasingly liberal multilateral treaties on nationality nor mutual legal interference by ways of diffusion seems to consistently influence national legal arrangements. Hence, there is no evidence of a converging 'devaluation' of national citizenship. This is also illustrated by the steady political contestations that continue to surround policy change in this area. With regard to future research, a crucial task for scholars of migration and citizenship is to further specify the causal interaction between traditional institutions, political structures, and the multi-layered set of agencies that shape the boundaries between inclusion and exclusion in modern citizenship regimes. In this regard, the QCA results could provide first analytical insights that deserve further academic attention.

References

- Armingeon, K., Gerber, M., Leimgruber, P., Beyeler, M. (2011) Comparative political data set, 1960-2010. Bern: Universität Bern, Institut für Politikwissenschaft.
- Bauböck, R. (2006) Citizenship and migration concepts and controversies, in: Bauböck, R. (ed.) Migration and citizenship. Legal status, rights and political participation. Amsterdam: Amsterdam University Press, 15-32.
- Bauböck, R., Ersbøll, E., Groenendijk, K., Waldrauch, H. [eds.] (2006) Acquisition and loss of nationality. Policies and trends in 15 European states. Volume 1: Comparative analysis. Amsterdam: Amsterdam University Press.
- Beyer, J. (2006) Pfadabhängigkeit: über institutionelle Kontinuität, anfällige Stabilität und fundamentalen Wandel. Frankfurt a.M.: Campus-Verlag.
- Blatter, J. (2011) Dual citizenship and theories of democracy. *Citizenship Studies*, 15 (6-7): 769-798.
- Brubaker, R. (1992) Citizenship and nationhood in France and Germany. Cambridge: Harvard University Press.
- Budge, I., Klingemann, H., Volkens, A., Bara, J., Tanenbaum, E. (2001) Mapping policy preferences: estimates for parties, electors and governments, 1945-1998. Oxford: Oxford University Press.
- de Hart, B., van Oers, R. (2006) European trends in nationality law, in: Bauböck, R., E. Ersbøll, K. Groenendijk, H. Waldrauch (eds.) - Acquisition and loss of nationality. Policies and trends in 15 European states. Volume 1: Comparative analysis. Amserdam: Amsterdam University Press, 317-358.
- Faist, T. (2007) The fixed and porous boundaris of dual citizenship, in: Faist, T. (Hrsg.)
 Dual citizenship in Europe. From nationhood to societal integration. Hampshire: Ashgate, 1-44.
- Givens, T., Luedtke, A. (2005) European immigration policies in comparative perspective: issue salience, partisanship and immigrant rights. *Comparative European Politics*, 3: 1-22.
- Goodman, S.W. (2010) Integration requirements for integration's sake? Identifying, categorising and comparing civic integration policies. *Journal of Ethnic and Migration Studies*, 36 (5): 753-772.
- Gosewinkel, D. (2001) Staatsangehörigkeit in Deutschland und Frankreich im 19. und 20. Jahrhundert, in: Conrad, C., J. Kocka (eds.) Staatsbürgerschaft in Europa: historische Erfahrungen und aktuelle Debatten. Hamburg: Edition Körber-Stiftung, 48-62.
- Habermas, J. (1992) Citizenship and national identity: some reflections on the future of Europe. *Praxis International*, 12 (1): 1-19.
- Hansen, R., Weil, P. [eds.] (2001) Towards a European nationality. Citizenship, immigration and nationality law in the EU. Houndmills: Palgrave.
- Heintz, B., Greve, J. (2005) Die 'Entdeckung' der Weltgesellschaft: Entstehung und Grenzen der Weltgesellschaftstheorie, in: Heintz, B., R. Münch, H. Tyrell (eds.) - Weltgesellschaft. Theoretische Zugänge und empirische Problemlagen. Sonderband der Zeitschrift für Soziologie. Stuttgart: Lucius & Lucius, 89-119.
- Heintz, B., Müller, D., Schiener, H. (2006) Menschenrechte im Kontext der Weltgesellschaft.
 Die weltgesellschaftliche Institutionalisierung von Frauenrechten und ihre Umsetzung in Deutschland, der Schweiz und Marokko. Zeitschrift für Soziologie, 35 (6): 424-448.

- Helbling, M. (2013) Validating integration and citizenship policy indices. *Comparative European Politics*, 11 (5): 555-576.
- Howard, M.M. (2010) The impact of the far right on citizenship policy: Explaining continuity and change. *Journal of Ethnic and Migration Studies*, 36 (5): 735-751.
- Howard, M.M. (2009) The politics of citizenship in Europe. New York: Cambridge University Press.
- Janoski, T. (2010) The ironies of citizenship: Naturalization and integration in industrialized countries. Cambridge: Cambridge University Press.
- Joppke, C. (2010) Citizenship and immigration. Cambridge: Polity.
- Joppke, C. (2003) Citizenship between de- and re-ethnicization. European Journal of Sociology, 44 (3): 429-458.
- Kitschelt, H. (2007) Growth and persistence of the radical right in postindustrial democracies: advances and challenges in comparative research. *West European Politics*, 30 (5): 1176-1206.
- Knill, C. (2005) Cross-national policy convergence: concepts, approaches and explanatory factors. *Journal of European Public Policy*, 12 (5): 764-774.
- Koenig, M. (2003) Staatsbürgerschaft und religiöse Pluralität in post-nationalen Konstellationen. Zum institutionellen Wandel europäischer Religionspolitik am Beispiel der Inkorporation muslimischer Immigranten in Großbritannien, Frankreich und Deutschland. Marburg: Universität, Fachbereich Gesellschaftswissenschaften und Philosophie.
- Koopmans, R. (2005) Contested citizenship: Immigration and cultural diversity in Europe. Minneapolis: University of Minnesota Press.
- Koopmans, R., Michalowski, I., Waibel, S. (2012) Citizenship rights for immigrants: national political processes and cross-national convergence in Western Europe, 1980-2008. American Journal of Sociology, 117 (4): 1202-1245.
- Lochocki, T. (2012) Immigrationsfragen: Sprungbrett rechtspopulistischer Parteien. Aus Politik und Zeitgeschichte, 62 (5-6): 30-36.
- Mackert, J., Müller, H.-P. (2007) Die Staatsbürgerschaft vor postnationalen Herausforderungen, in: Mackert, J., H.-P. Müller (eds.) - Moderne (Staats)Bürgerschaft. Nationale Staatsbürgerschaft und die Debatten der Citizenship Studies. Wiesbaden: VS Verlag für Sozialwissenschaften, 9-30.
- Mahoney, J. (2003) Strategies of causal assessment in comparative historical analysis, in: Mahoney, J., D. Rueschemeyer (eds.) - Comparative historical analysis in the social sciences. Cambridge: Cambridge University Press, 337-372.
- Mahoney, J. (2000) Path dependence in historical sociology. *Theory and Society*, 29: 507-548.
- Mahoney, J., Goertz, G. (2006) A tale of two cultures: contrasting quantitative and qualitative research. *Political Analysis*, 14 (3): 227-249.
- Meyer, J.W., Boli, J., Thomas, G.M., Ramirez, F.O. (1997) World-society and the nationstate. *American Journal of Sociology*, 103 (1): 144-181.
- Michalowski, I. (2011) Required to assimilate? The content of citizenship tests in five countries. *Citizenship Studies*, 15 (6-7): 749-768.
- Minkenberg, M. (2001) The radical right in public office: agenda-setting and policy effects. *West European Politics*, 24 (4): 1-21.

- Nassehi, A., Schroer, M. (2000) Staatsbürgerschaft. Über das Dilemma eines nationalen Konzepts unter postnationalen Bedingungen, in: Holz, K. (eds.) - Staatsbürgerschaft. Soziale Differenzierung und politische Inklusion. Opladen: Westdeutscher Verlag, 31-52.
- OECD (2012) International Migration Database. [http://stats.oecd.org/-Index. aspx?DatasetCode=MIG], (accessed 01/15/2013).
- Ragin, C.C., Davey, S. (2009) fs/QCA, Version 2.5, Tucson: University of Arizona.
- Ragin, C.C. (2006) Set relations in social research: evaluating their consistency and coverage. *Political Analysis*, 14 (3): 291-310.
- Ragin, C.C. (2000) Fuzzy-set social science. Chicago/ London: University of Chicago Press.
- Ragin, C.C. (1987) The comparative method: moving beyond qualitative and quantitative strategies. Berkeley: University of California Press.
- Saalfeld, T. (2011) Wahlbeteiligung und Parteiwahl von Personen mit Migrationsgeschichte in den Demokratien Europas. Dossier Politische Partizipation und Repräsentation in der Einwanderungsgesellschaft. Berlin: Heinrich-Böll-Stiftung. [http://www.migration-boell. de/web/integration/47_3008.asp]. (02/ 11/ 13)
- Schneider, C.Q., Wagemann, C. (2012) Set-theoretic methods for the social sciences. Cambridge: Cambridge University Press.
- Schneider, C.Q., Wagemann, C. (2007) Qualitative Comparative Analysis and Fuzzy Sets. Ein Lehrbuch für Anwender und jene, die es werden wollen. Opladen & Farmington Hills: Barbara Budrich.
- Shachar, A. (2009) The birthright lottery: citizenship and global inequality. Cambridge: Harvard University Press.
- Shachar, A. (2006) The race for talent: highly skilled migrants and competitive immigration regimes. *New York University Law Review*, 81: 101-158.
- Soysal, Y. (1994) Limits of citizenship: migrants and postnational membership in Europe. Chicago: University of Chicago Press.
- Stöss, R. (2006) Rechtsextreme Parteien in Westeuropa, in: Niedermayer, O., R. Stöss, M. Haas (eds.) - Die Parteiensysteme Westeuropas. Wiesbaden: VS Verlag für Sozialwissenschaften, 521-564.
- Strijbis, O. (2014) Migration background and voting behavior in Switzerland: A sociopsychological explanation. Swiss Political Science Review, doi: 10.1111/spsr.12136. [published online Oct. 31 2014]
- Tilly, C. (1995) Citizenship, identity and social history. *International Review of Social History*, 40 (3): 1-17.
- United Nations (1979) Convention on the Elimination of All Forms of Discrimination against Women. New York: United Nations General Assembly.
- Vink, M., de Groot, G.-R. (2010) Citizenship attribution in Western Europe. International framework and domestic trends. *Journal of Ethnic and Migration Studies*, 36 (5): 713-734.
- Waldrauch, H. (2006) Statistics on acquisition and loss of nationality in EU15 member states, in: Bauböck, R., E. Ersbøll, K. Groenendijk, H. Waldrauch (eds.) - Acquisition and loss of nationality, vol.1: comparative analyses. Amsterdam: Amsterdam University Press, 269-315.
- Waldrauch, H., Hofinger, C. (1997) An index to measure the legal obstacles to the integration of migrants. *New Community*, 23 (2): 271-285.
- Weil, P. (2008) How to be French. Nationality in the making. Durham: Duke University Press.

- Weil, P. (2001) Access to citizenship: a comparison of twenty-five nationality laws, in: Aleinikoff, T.A., D. Klusmeyer (eds.) - Citizenship today. Global perspectives and practices. Washington: Carnegie Endowment for International Peace, 17-35.
- Wimmer, A., Glick Schiller, N. (2003) Methodological nationalism, the social sciences and the study of migration. *International Migration Review*, 37 (3): 576-610.

Appendix

A1: Share of voters with a migration background (national elections, %)* (Source: Koopmans et al. 2012: Appendix, Tab. A1)

	1980	1990	2002	2008
Austria	0,9	2,0	4,9	7,4
Belgium	0,7	2,2	6,1	8,1
Finland*	0,2	0,3	0,8	1,3
France	2,5	4,8	7,3	9,9
Germany	0,2	0,5	1,8	2,8
Netherlands	2,5	4,8	9,5	10,3
Sweden	2,2	4,4	9,1	11,4

* The share of immigrants with voting rights is calculated by dividing the cumulative number of persons naturalized since 1970 by the total population of a country minus the foreign population. Numbers for Finland are based on own calculations, accordingly; Sources: Waldrauch 2006, OECD 2012

A2: Average share of votes for radical right-wing parties, 1975-2010 (national elections, %)

(Sources: Stöss 2006: 549, Lochocki 2012: 31, Minkenberg 2001)

	Party*	1975-79	1980-85	1986-90	1991-95	1996-2000	2001-05	2005-10
Austria	FPÖ			13,2	22,2	26,9	10,0	17,5
Belgium	VB	1,4	1,3	1,9	7,2	9,9	11,6	9,9
Finland	SMP					1	1,6	4,1
France	FN	0,8	0,2	9,7	12,4	15,1	11,1	10,4
Germany	REP,	0,3	0,2	0,9	1,8	2,2	1,3	1,3
Netherlands	CD, LPF,		0,8	0,9	2,4		11,4	3,2
Sweden	NyD, SD				6,7	1,2	2,2	4,3

* FPÖ=Freedom Party of Austria; VB=Vlaams Blok (2004: Vlaams Belang); SMP=Finish Rural Party; FN=Front National; REP=Republicans, NPD=National Democratic Party of Germany; CD=Centre Democrats, LPF=Pim Fortuyn List, PVV=Party of Freedom; NyD=New Democracy, SD=Swedish Democrats

	Relating to the Conflict of Nation-	Convention on the Reduction of Cases of Multiple Nationality (1963, in force 1968)	Second Protocol Amending the Convention on the Reduction of Cases of Multiple National- ity (1993, in force 1995)	European Conven- tion on Nationality (1997, in force 2000)
Austria	signed (1930)	signed (1963), rati- fied (1975)	-	signed (1997), rati- fied (1998)
Belgium	ratified (1930)	signed (1963), ratified (1991), denounced (2008)	-	-
Finland	-	-	-	signed (1997), rati- fied (2008)
France	signed (1930)	signed (1963), rati- fied (1965)	signed (1993), rati- fied (1995)	signed (2000)
Germany	signed (1930)	signed (1963), ratified (1969), denounced (2002)	-	signed (2002), rati- fied (2005)*
Netherlands	ratified (1930)	signed (1963), rati- fied (1985)	signed (1994), rati- fied (1996)	signed (1997), rati- fied (2001)
Sweden	signed (1930), ratified (1933)	signed (1968), rati- fied (2002)		ratified (2001)

A3: Ratification of multilateral treaties on nationality

* Germany ratified the Convention only with the following reservations concerning the implementation of the so-called optional model of dual citizenship: ,Germany declares that loss of German nationality ex lege may, on the basis of the "option provision" under Section 29 of the Nationality Act [Staatsangehörigkeitsgesetz-StAG] (opting for either German or a foreign nationality upon coming of age), be effected in the case of a person having acquired German nationality by virtue of having been born within Germany (*ius soli*) in addition to a foreign nationality."

		cond	litions			outco	me		
leftgov	right radical	libpath	immigrant vote	intlaw	libdiffusion	liberal citizenship	consistency	Ν	empirical cases
1	1	1	1	1	1	1	1.000	1	FRA 1997-2002
1	1	1	1	0	0	1	1.000	1	FRA 1988-93
1	0	1	0	0	0	1	1.000	1	FRA 1981-86
1	1	1	0	0	1	1	1.000	2	BEL 1991-95, 1995-99
1	1	1	1	0	1	1	1.000	2	BEL 1999-2003, 2003-07
1	0	1	1	0	1	1	0.974	1	[NL 1994-98]
0	1	1	1	0	1	1	0.972	1	BEL 2007-10
1	0	1	1	1	1	1	0.964	1	[NL 1998-2002]
0	1	1	1	1	0	1	0.963	1	FRA 2002-07
0	1	1	1	1	1	1	0.963	1	FRA 1993-97
0	0	0	1	1	1	1	0.933	1	[NL 2007-10]
0	0	0	1	0	0	1	0.911	2	NL 1989-94, [NL 1986-89]
0	0	0	1	0	1	1	0.907	1	[SWE 2006-10]
1	0	0	1	0	1	1	0.902	2	[SWE 1998-2002, 2002-06]
0	1	0	1	1	1	0	0.852	1	
1	1	0	0	0	0	0	0.824	2	
0	1	0	1	0	1	0	0.821	2	
1	0	0	0	0	1	0	0.804	5	
0	0	0	0	0	1	0	0.764	3	
0	1	0	0	0	0	0	0.757	1	
1	0	0	0	0	0	0	0.754	5	
0	1	0	0	0	1	0	0.737	2	
0	0	0	0	0	0	0	0.703	7	

A4: Truth table 'liberal citizenship'

	liberal <u>citizenship</u>	leftgov*libpath *immigrantvote		~rightradical* immigrantvote	
BEL					
1981-85	0.6	0	0.2	0	0.2
1987-91	0.8	0.2	0.2	0.2	0.2
1991-95	0.8	0.4	0.6	0.4	0.6
1995-99	0.8	0.4	0.2	0.2	0.6
1999-2003	0.8	0.6	0.2	0.2	0.6
2003-07	0.8	0.6	0.2	0.2	0.6
2007-10	0.8	0.4	0.2	0.2	0.4
FIN					
1999-2003	0.6	0.2	0.2	0.2	0.2
2003-07	0.6	0.2	0.4	0.2	0.4
FRA					
1981-86	1	0.4	0.8	0.4	0.4
1988-93	1	0.6	0.2	0.2	0.2
1993-97	0.8	0	0	0	0.2
1997-2002	1	0.8	0	0	0.6
2002-07	0.8	0.4	0	0	0.4
NL					
1986-89	0.4	0.2	0.2	0.6	0.2
1989-94	0.6	0.4	0.4	0.6	0.4
1994-98	0.4	0.6	0.6	0.6	0.6
1998-2002	0.4	0.6	0.6	0.8	0.6
2007-10	0.4	0.4	0.4	0.6	0.4
SWE					
1994-98	0.2	0.2	0.2	0.6	0.2
1998-2002	0.4	0.2	0.2	0.8	0.2
2002-06	0.4	0.4	0.4	0.8	0.4
2006-10	0.4	0.4	0.4	0.6	0.4
Consistancy		0.96	0.96	0.74	0.97
Consistency	0				
Unique coverag	e	0.03	0.02	0.03	0.02

A5: Membership in sufficient causal paths ('liberal citizenship')

		со	nditio	ns		outcome	•		
leftgov	right radical	libpath	immigrant vote	intlaw	libdiffusion	restrictive citizenship	consistency	N	empirical cases
0	0	0	1	1	1	1	0.933	1	NL 2007-10
1	0	1	1	1	1	1	0.929	1	NL 1998-2002
0	1	0	1	1	1	1	0.926	1	NL 2002-06
0	0	0	0	0	1	1	0.910	3	FIN 1991-95; GER 1994-98,
0	0	0	1	0	1	1	0.884	1	SWE 2006-10
1	0	0	1	0	0	1	0.878	1	SWE 1994-98
1	0	0	1	0	1	1	0.878	2	SWE 1998-2002, 2002-06
1	0	0	0	0	0	1	0.877	5	AUT 1979-83; SWE 1982-85,
0	0	0	0	0	0	1	0.875	7	BEL 1981-85, FIN 1983-87, 1987-
1	0	0	0	0	1	1	0.875	5	FIN 1995-99, [FIN 1999-2003,
0	1	0	0	0	1	1	0.868	2	AUT 1995-1999, 1999-2003
0	1	0	0	0	0	1	0.865	1	AUT 1990-94
0	0	0	1	0	0	0	0.844	2	
1	0	1	1	0	1	0	0.842	1	
1	1	0	0	0	0	0	0.824	2	
0	1	0	1	0	1	0	0.821	2	
1	0	1	0	0	0	0	0.816	1	
0	1	1	1	1	1	0	0.815	1	
0	1	1	1	1	0	0	0.815	1	
1	1	1	1	1	1	0	0.783	1	
1	1	1	0	0	1	0	0.724	1	
0	1	1	1	0	1	0	0.722	1	
1	1	1	1	0	0	0	0.647	1	
1	1	1	1	0	1	0	0.647	2	

A6: Truth table for the outcome 'restrictive citizenship'

	<u>restrictive</u> <u>citizenship</u>	~libpath*~leftgov* ~immigrantvote	~libpath*leftgov* ~rightradical	~libpath*~leftgov* intlaw
AUT				
1979-83	0.8	0.2	0.8	0.2
1983-86	0.8	0.4	0.4	0.2
1986-90	0.8	0.4	0.2	0.2
1990-94	0.8	0.6	0	0.2
1995-99	0.8	0.6	0	0.2
1999-2003	0.8	0.6	0	0.4
2003-07	1	0.4	0.2	0.4
BEL				
1981-85	0.4	0.8	0.2	0.2
1987-91	0.2	0.4	0.6	0.2
FIN				
1983-87	0.8	0.6	0.4	0.2
1987-91	0.8	0.6	0.4	0.2
1991-95	0.8	0.6	0.4	0.2
1995-99	0.8	0.4	0.6	0.2
1999-2003	0.4	0.2	0.8	0.2
2003-07	0.4	0.2	0.6	0.2
GER				
1983-87	0.8	0.8	0.2	0.2
1987-90	0.8	0.8	0.2	0.2
1990-94	0.8	0.8	0.2	0.2
1994-98	0.8	0.8	0.2	0.2
1998-2002	0.6	0.2	0.8	0.2
2002-05	0.6	0.2	0.8	0.2
2005-09	0.6	0.6	0.4	0.4
NL				
1982-86	0.6	0.6	0.2	0.2
1986-89	0.6	0.4	0.2	0
1994-98	0.6	0.2	0.4	0.4
1998-2002	0.6	0.2	0.4	0.4
2002-06	0.6	0	0	0.6
2007-10	0.6	0	0.4	0.6

A7: Membership in sufficient causal paths ('restrictive citizenship')

SWE				
1982-85	0.8	0.2	0.8	0.2
1985-88	0.8	0.4	0.6	0.2
1988-91	0.8	0.4	0.6	0.2
1991-94	0.8	0.4	0.2	0.2
1994-98	0.8	0.4	0.6	0.2
1998-2002	0.6	0.2	0.6	0.4
2002-06	0.6	0	0.6	0.4
2006-10	0.6	0	0.4	0.4
Consistency		0.87	0.85	0.94
Unique coverage		0.13	0.05	0.02