# Multicultural Citizenship: Towards a European Policy

## Rainer Bauböck

### Multicultural citizenship

As we enter the new millennium, multiculturalism seems hardly a novelty but more like a baggage we carry over from the final three decades of the last century Without causing much protest the American sociologist and educationalist Nathan Glazer could claim in 1997 that "we are all multiculturalists now" (Glazer 1997). Indeed, this consensus appears to bridge the ideological divides. Multiculturalism is a broad church. Its mainstream version has been associated with the democratic left. However, far right parties like the Front National in France or the Freedom Party in

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Austria defend their own version of a "right to difference" for all nations and cultures. In its broadest sense multiculturalism merely implies recognizing the value that their cultural identities might have for others. This excludes a claim that my culture is the best and all should adopt it for their own sake, but it does not prevent me from maintaining that my culture is best for my group and ought to be protected against foreign elements that might infiltrate and dilute it. The core idea of multiculturalism is that there is an irreducible plurality of culturally defined communities that cannot be ranked within a hierarchy of human civilization. This allows for widely different views how these cultures relate to each other. Should they be separate with regard to membership and territory or can they freely intermix? Are cultural traditions intranslatable or is there a potential for intercultural understanding? Questions like these cannot be answered in general; answers vary not only across the ideological spectrum, but depend also on the kind of cultural communities we have in mind and on the context for their encounters. We ought to distinguish between religious, linguis-

tic, racially stigmatised or life style groups, between national, immigrant or aboriginal minorities as well as between the contexts of family life, the market place, civil society and the political community.

The broad consensus on multiculturalism rapidly breaks down once we focus on the latter context, i.e. the relation between membership in cultural and political communities. 'Multicultural citizenship' is a rather controversial idea even within liberal democratic theories. It suggests that although we are all equal as individual members of a democratic polity, our affiliations to different cultural communities may still be relevant for our status, rights and practices as citizens.

Many liberal theorists disagree strongly. Liberal republicans insist that in the political sphere the demands of citizenship always override affiliations to cultural groups. The task of the liberal state is to hold cultural difference at bay. It must guarantee equal rights for individuals against the claims of cultural communities for special treatment and collective powers. The liberal fear is that a multicultural differentiation of citizenship will undermine soli-

darity and respect across group boundaries and may lead to internal fragmentation or even a territorial partitioning of the polity.

Another critique of multicultural citizenship takes the opposite view. From a libertarian perspective the danger lies in the state becoming too powerful. Cultural communities are regarded as voluntary associations and the liberal state is itself a voluntary association of such associations. It should neither hand out special rights and material benefits to cultural communities nor impose laws that constrain their freedom. In this view liberalism is a regime of radical toleration that prohibits interference with the internal affairs of communities as long as their members are free to leave (see Kukathas 1992, 1997). The rights and duties of citizenship depend on a spontaneous consensus between different cultural communities, which makes it likely that they will be reduced to negative liberties protected by a minimal state.

For both these views citizenship in a culturally diverse society can only be equal if the state is neutral and disregards the cultural affiliations of its citizens. In contrast, theories of multicultural citizenship acknowledge that cultural and political membership are both important and cannot be neatly separated into different realms. Liberal democracies have to take cultural identities of their citizens into account in order to treat them with equal respect and concern.

There are at least four partly overlapping arguments for this view, which focus on the values of autonomy, equality, diversity and peace respectively. The first one has been stated by the Canadian philosopher Will Kymlicka (1989, 1995). Individual autonomy requires a range of meaningful options for one's life. These options can only be fully interpreted from within a 'societal culture'. Such cultures are territorially concentrated and based on a shared language. They encompass a wide range of human activities but allow for a plurality of religious and moral views. Secure membership in a societal culture is a primary good for everybody. Minorities are frequently disadvantaged in reproducing their culture and liberal states ought to provide them with some external protection against the pressure exercised by national majorities. This protection does not, however, extend to illiberal cultural traditions, which restrict the range of options for individuals. For the sake of individual autonomy liberal democracies can impose constraints on how such groups may treat their own members.

The second argument is about equality of citizenship. It starts from the historical fact that all present liberal democracies are not culturally neutral. They establish certain languages for government business and public education and their national symbols refer to historic traditions that are not shared by all groups of their population. Moreover, as the American theorist Iris Young (1990) has maintained, equal membership in the polity is undermined by unequal opportunities in society for members of oppressed groups. An apparently neutral citizenship will merely serve to reinforce entrenched privileges of dominant groups. In order to achieve equality citizenship must be differentiated. Disadvantaged minorities need special forms of representation that give them a voice in the political process.

The third argument is stated most clearly by the British-Indian philosopher Bhikhu Parekh (1995, 2000). Liberal states ought to protect minority cultures not only because these are valuable for their members and because a devaluation of their origins translates into a status of second-class citizenship, but also because cultural diversity is a public good. A role for cultural communities in public life will help to overcome their segregation, will enrich their perspectives by teaching them to see their own traditions through the eyes of others and will contribute to the overall quality of democracy. Every community of citizenship has, however, its own operative public values that set limits for the toleration of controversial practices.

The fourth argument is less sanguine about cultural diversity and regards it rather as a potential source of conflict that may undermine common citizenship. The American theorist Jacob Levy (1996, 2000) defends a "multiculturalism of fear". In this view, liberals should be equally afraid of cultural oppression by majority nationalism and of internal restrictions of liberty within minority communities. The primary task is not to preserve cultural identities or to achieve justice for minorities, but to protect citizens

from violence, cruelty and humiliation. Escalating national, ethnic or religious conflicts have a strong potential to unleash these evils. The difficulty is that attempts to assimilate minorities or to ban cultural difference from the public realm will often contribute to such escalation. Liberal democracies must therefore find ways how to accommodate cultural claims in order to create a space for common citizenship.

For my present purposes it is not necessary to discuss the flaws and merits of these arguments. My ambition is not to offer a philosophical justification for multicultural citizenship, but rather to discuss how this idea could be applied in the context of the European Union. For this task the four perspectives I have outlined cover sufficient common ground: Each of them will justify a certain range of group-differentiated rights, but all of them set limits to the claims of cultural communities for the sake of membership in a liberal democratic polity.

There is, however, one other aspect of multicultural citizenship that emerges more clearly in the European context than in the American and British debates I have referred to. Multicultural citizenship is not only a *policy* question, which asks how the institutions of liberal democracies ought to deal with cultural difference and minorities, but also a *polity* question about the future identity and boundaries of the political community. This is most obvious with regard to conflicts over self-determination for national minorities. Some strive for full independence attempting thus to cre-

ate a new polity; others want to join a neighbouring state changing thereby international borders. Even those who are satisfied with territorial autonomy still modify the internal borders and division of powers within the polity. In contrast, the demands of immigrant minorities normally do not upset the territorial structure. They affect instead its rules of membership and historic identity. A political community defines and controls its own character through its regulations for new admissions. Restricting or opening up access to its territory and to its citizenship shapes the future composition of the polity. Liberal democracies control and limit immigration, but selecting it according to national origins and creating high obstacles for naturalization is generally regarded as unacceptable. This means that immigrants from diverse origins will become new citizens who may use the cultural liberties and political powers granted to them to challenge historic identities that exclude their own traditions.

Two features that characterise the European context make these polity questions of multicultural citizenship especially pertinent. The first is the inertia of prevailing national identities that strongly resist the idea of a continuous self-transformation through population movements and the accommodation of minority claims; the second is the historically unique attempt to construct a supranational polity out of sovereign nation-states. Both are obviously in tension with each other. It is my argument that they can only be solved together. European na-

tions must become internally more pluralistic in order to integrate into a larger supranational polity.

## Towards a European federation

When thinking about the future of the European Union many shy away from the word 'federalism'. Yet there are hardly any other concepts that we could use to describe the coming together and integration of several independent states into a new political entity. The important question is not whether the goal of European integration is federation but what kind of federation this going to be.

The first contrast that springs to one's mind is between confederation and federation. The Union is rightly seen as moving from the former to the latter. Historical analogies, especially with the second US constitution in 1787, often lead to the assumption that federation implies a pooling of all external sovereignty and a strong central government. However, this need not be the case. A federation involves by definition a vertical sharing of sovereignty between constitutive units and a federal government. Which kinds of political powers are concentrated at which level is, in principle, an open question. German foreign minister Joschka Fischer suggested in a speech given at Berlin's Humboldt University on 12 May this year that in a future European federation there would be a "division of sovereignty" between national and European governments, with a strong principle of

subsidiarity guaranteeing the former control over all political agendas that they are better equipped to deal with and have not transferred to the federal level.[1] The important difference between confederation and federation does not lie in the concentration of power at the level of member states or of the union, but in the structure of membership. In a confederation, only states or governments are represented in the common political institution, whereas in federations citizens are directly represented both in constitutive units (the provinces, regions or states) and at the federal level. A democratic federation is thus not only a multilevel government but also a multilevel community of citizens towards whom all governments are accountable. Direct election of EP members since 1979 and the formal introduction of EU citizenship in the Maastricht Treaty of 1992 were the first timid steps towards federation; a Charter of Fundamental Rights will be a much larger one. However, in order to establish the crucial direct relation between citizens and the federation, a modernized catalogue of basic human rights will not suffice. What ties individual citizens to a democratic community is not only the rights and liberties that they enjoy, but the relation of representation that makes political authorities directly accountable to them. A European federation must establish democratic accountability of the Commission and the Council and legislative powers for the European Parliament.

The second contrast, which is the more important one for my present purposes, is between regional and multinational federalism. Federations vary not only with regard to a vertical division of powers, but also with regard to the horizontal relations between their constitutive parts (see Lijphart 1984: 179–183). In the US, Australia, Germany and Austria all states, provinces or *Länder* are considered as regional subdivisions of a homogeneous nation. By contrast, in Canada, Belgium or Switzerland some provincial borders separate linguistic groups. Spain and the UK are not formally federal states, but devolution in these countries follows a similar pattern. The effect is that some national identity groups gain territorial autonomy and often also guaranteed representation in central government institutions.

For a future European federation there is no doubt that it will be multinational in this sense, i.e. composed of states with different languages and distinct national identities. This still leaves open the question how to imagine a common European identity and its relation to the various national and ethnic identities within member states. I will discuss three answers to this question.

## Postnational Federation

The first model suggests that a European identity ought to be disconnected from national ones and should be based instead on shared political values and constitutional principles. The contrast between such civic patriotism and ethnic nationalism has been often overstated.[2] A notorious difficulty with the former is that it fails to identify the particular political community one ought to be loyal with. If my loyalty to my country is grounded in its constitution, which guarantees me fundamental rights, why should I not be loyal to another democratic state whose constitution is as good or even better in this respect? In my answer to this question it will be impossible to avoid any reference to the historical accident that I happen to be born and raised in this country rather than another one. Constitutional patriotism is thus always parasitic on a communitarian idea of unchosen belonging. It is also parasitic on cultural particularities. Without a shared public culture the polity cannot be imagined as a community that deserves loyalty. A society of individuals who coincidentally reside in a given state territory at a given point in time cannot be imagined as a community of that sort.[3] Without public narratives about a common history one cannot think of this society in terms of the first person plural.

In the old nation-states of Europe there is no shortage of such narratives. In European history their very abundance is the problem: they have too often raised competing claims to the same populations and territories. In this context constitutional patriotism is a noble idea: it cannot unravel all these communities but tries to push them to a background. Liberal constitutional principles cannot determine our membership in a particular community, but they may provide us with better reasons for loyalty and can help us to peacefully resolve our conflicts,

including those about national identities.

The project of a European constitutional patriotism is different precisely because one cannot take its background for granted. Europe is divided not only by its various national languages and cultures, but also by its past. Historically, the idea of European unity has been always associated with that of empire, never with that of a federal republic. This difficulty is exacerbated by the problem of variable geography. Empires have moving borders. They are not imagined as political communities of citizens, but of subjects who are loyal towards a dynasty. In contrast with an empire, a democratic polity needs a stable territory within which self-government can be established.

In search for historical analogies, we might look west across the Atlantic. The most successful example of creating a civic identity in an expanding federal state is the USA. Yet the American model was certainly not a pure case of constitutional patriotism. It started out from a dominant WASP identity that was sharply separated from indigenous peoples and African slaves and only gradually expanded to include other groups of immigrants. Moreover, the settlers and migrants who built the American nation had before been uprooted from their national homelands. Europe, however, can never become a melting pot nation – its citizens are invited to join the federation while residing in their traditional homelands and retaining their national languages and affiliations. This is different only for the small number of peo-

ple who travel regularly to Brussels for EU meetings. Their life world and their career patterns provide a solid material base for an emerging European identity.[4] The great mass of European citizens does not share this experience. Levels of mobility within the Union are so low that they hardly contribute to a geographic fusion of national identities.

To sum up this point: The European federal project lacks three prerequisites for a civic form of patriotism: there is no self-evident background of historical narrative and public culture, there is no stable territorial frame of reference, and there is no melting pot of uprooted peoples. Paradoxically, this lack of preconditions need not mean that the project is doomed to failure. Constitutional principles might become a focus of identity by default rather than by design, because there is nothing else that could unite these populations *politically*. A European civic patriotism must be *postnational,* not so much because it exemplifies a new cosmopolitan identity, but because it is cut off from the sources of national identity that support all existing manifestations of civic patriotism. For this very reason, a European civic identity will, however, also remain rather thin.

A European constitution that can actually be read by the citizens and taught in the classrooms of European schools would certainly help. But citizens are less likely to be enthusiastic about the beauty of such a text than legal scholars and political philosophers. The difficulty is also greater than that of writing and adopt-

ing such a document. In the European case one cannot first introduce a constitution and then wait patiently until political support for it grows among the citizenry. Federalization will not be a single event but a long process. This process of democratising the Union must itself be democratic; it must enjoy widespread support among citizens and will be put to occasional tests in elections and referenda. The prospect of trading in national identities for a future postnational one will hardly mobilize European citizens to endorse this project.

## Multinational Federation

The alternative is to conceive of Europe as a multinational federation not only in the composition of its parts, but also with regard to a common identity. The Union would then not merely "respect the national identities of its member states" (Article 6.3 TEU) but also *affirm* them.

This second model must avoid the pitfalls of a confederal "Europe of fatherlands", on the one hand, and of a European "nested nation", on the other hand. A Europe of fatherlands is diametrically opposed to building a community of citizens at the European level. In this view national loyalties are supreme and ultimate. They are also the only kind of attachment that can ground substantive forms of democracy. Nations may closely cooperate in alliances for limited purposes or in all-purpose confederations, but the supranational decision-making bodies must be exclusively accountable to national govern-

ments that are themselves accountable to their respective citizenry.

The opposite danger is a view of Europe as a nested nation that contains within itself the national identities of its member states much like Britishness contains Scottish, Welsh, English (and, more controversially, Ulster) identities. The British political philosopher David Miller suggests that stable democratic rule needs a common national identity (Miller 1995). In his view, nations can themselves be internally multinational, or to put it the other way round, multinational federations must develop a sense of common nationhood in order to remain well integrated. Miller is sceptical towards European political integration because he correctly assumes that it is not a nation-building project. I would, however, disagree with the diagnosis itself. Most Québecois, Catalans or Scots feel rather uncomfortable with the idea that they are parts of a larger Canadian, Spanish or British *nation* because this is opposed to their conception of multinational *federation* of equal partners. Attempts to create or strengthen a federation-wide sense of nationhood may actually contribute to disintegrate multinational federations.[5] The reason why nested nationhood is so difficult to achieve is an endemic problem of asymmetry in most multinational federations. A majority population identifies with the larger state while a minority puts its regional identity first.

In the context of the European Union such asymmetric multinationalism may not seem a likely scenario. Imperial notions of a French or German Europe have been defeated at Waterloo and Stalingrad. There is no hegemonic nation in Europe that could imagine itself as the core of a nascent European nation. Yet the danger of asymmetry arises also if member states of the Union move towards federation at different speeds with some forming a "centre of gravitation" (Joschka Fischer). Even if that centre remains open for others to join, it will presumably determine the rules that these others will have to accept. One should be cautious when drawing the obvious parallel with the expanding Schengen area and Euro zone. A common currency and national border guards are certainly powerful symbols of sovereignty. But building a federal polity is not the same thing as creating an area of free movement and common currency. It involves much more than giving up cherished symbols of this kind. In order to cope with such asymmetry of the integration process itself, the citizens of the Union would have to accept what the Canadian philosopher Charles Taylor has called "deep diversity": a mutual recognition of different ways of belonging to the Union (Taylor 1993: 155–186).

Shifting external borders are a second difficulty for European integration, which normally does not arise in federal states. I have suggested that this variable geography might make a postnational mode of integration more plausible, but it creates additional problems for a multinational conception. A multinational federation is like a compact between a limited number of potentially or formerly independent communities. If more and more communities join this makes the federation not only more difficult to administer, but upsets also a carefully crafted balance between the founding members. The official language regime in the EU is a good example. With further enlargement the present rules will become ever more costly to maintain, but all reform options are likely to offend some national sensibilities (see Kraus 1998).

A third problem for a multinational European citizenship is democratisation. I have argued above that building a federal citizenship requires democratising the institutions of the Union. However, democratisation is also likely to exacerbate national conflicts. This is a lesson to be learned from the transition to democracy in postcommunist states. Supranational government in the EU operates so far in a rather undemocratic manner. Federalisation means that conflicts that had previously been negotiated in the sheltered environments of Commission and Council meetings or intergovernmental conferences will be much more exposed to public disputes and citizens' choices. In this process national identities will not simply fade away but will more likely be politically mobilised. The question is whether a sense of supranational political community can emerge at the same time and promote the integration of national identities into an expanding multinational conception.

It would be wrong to see the difficulties of asymmetry, enlargement and democratisation as

reasons to abandon a multinational approach. These problems cannot be simply wished away by adopting a postnational conception that ignores their deep roots in the real world. Multinationalism is, on the one hand, a realistic approach that accepts the diversity and strength of national identities in Europe and considers the dynamic of the integration process in this light. On the other hand, it is also a normative perspective that defends federal integration on the basis of mutual recognition. It is therefore necessarily opposed to any nationalism that puts the interests of one's own nation above all others.

## Multicultural Federation

A European federation would not merely involve an attempt to forge a political community from the national communities of member states. All of these states are themselves internally heterogeneous. Many have traditional linguistic minorities and all host substantial immigrant populations. The postnational and multinational models for European integration ignore these subnational and transnational identities. A pluralistic conception would include them by establishing common guidelines for the treatment of minorities within all member states and at the level of the federation itself.

At the beginning of this paper I have outlined general arguments for multicultural citizenship in liberal democracies, which apply to each European state taken separately. They converge on the insight that assimilation is no long-

er an answer to cultural diversity. Coercive assimilation is incompatible with a modern understanding of cultural liberties and is more likely to trigger resistance than compliance. Liberal democracy with its freedoms of speech and association offers minorities resources to organize and articulate their grievances; and modern communication technologies allow them daily contact with external homelands and transnational diaspora communities.

This does not imply that minority identities are immutable. Within a liberal framework the very proliferation of such identities means that they will also increasingly overlap. Geographic mobility and intermarriage create fuzzy boundaries and hybrid identities. Yet they do not necessarily resolve intercultural conflicts and may even exacerbate them compared to the situation in premodern or non-liberal societies where cultural communities have lived segregated alongside each other with their own separate territories or life worlds.

Cultural change occurs also over time within groups. Indigenous and national minorities that achieve territorial autonomy have to develop their own political institutions and economic policies that often undermine traditional identities and ways of life. Nation-building involves modernization efforts that make ethnic communities generally much more like each other with regard to their values and ways of life. However, the same process creates political boundaries between groups that are more durable than many of the cultural differences themselves.

This is different for immigrant minorities. First generation immigrants generally want to maintain their links with the national communities from where they have come, but they demand fair terms of integration rather than collective autonomy within the host society (see Kymlicka 1995, chapter 2). Over two or three generations integration normally goes together with spontaneous assimilation into dominant languages and life styles. Yet successfully established immigrant communities attract chain migration from the same origin. Even if the descendants of immigrants retain only a 'symbolic ethnicity' (Gans 1979), the migration dynamic may sustain a long-lasting ethnic pluralisation of the receiving society.

You may ask: What is the relevance of these questions for European integration? Let me suggest four reasons:

1 There are unresolved minority conflicts in many present member states, some of which involve terrorist violence or secession threats and some of which reach across state borders and affect other member states.
2 The Union is well aware that enlargement might lead to importing new conflicts.[6] There is a telling discrepancy between the 1993 Copenhagen criteria for the admission of new member states, which include respect for and the protection of minorities, and the principles the Union maintains for its current members, from which this item is absent.
3 National linguistic minorities in the EU often put high hopes

into political integration. They regard it as an opportunity to bypass their national governments and achieve direct recognition or representation at supranational level.

4  Migrant minorities also hope that their legal status and rights in the countries of the Union may be improved through harmonization. Free movement within the territory of the Union, combined with a harmonization of asylum and immigration policies, will create political pressure for common standards for the integration of immigrants.[7]

The Union has so far left the initiative in this field of rights of migrants and minorities to the Council of Europe and the OSCE. While a confederation may regard such matters as an internal affair of the states affected, this is certainly not possible for a federation in which minority conflicts naturally become a common concern.

A pluralistic conception faces two major difficulties: First, on these issues member states have their peculiar national approaches and dominant philosophies (see Favell 1998). It is very difficult to imagine what a common policy on linguistic and ethnic minorities would be like that France, Britain and Belgium could agree upon and that would not merely replicate minimal human rights standards. Second, critics of multicultural identity politics have emphasized the twin dangers of fragmentation of the larger political community and of internal repression within cultural minorities. The former results from esca-

lating and proliferating demands for group rights; the latter from tolerating illiberal practices and granting special powers to community leaders. These dangers are sometimes real but more frequently exaggerated. And to repeat the point I have already made: they can no longer be avoided through assimilation policies that produce homogenous and presumably liberal national identities. Liberal democracies must accommodate multinational and multicultural conflicts because they cannot suppress them without abandoning their basic principles.

Accommodation is, however, necessarily contextual and must take into account local and national circumstances. In a future European federation the constitution will have to guarantee general national and ethnic minority rights; the political institutions must address nationality conflicts that affect the internal security or territorial integrity of member states; but otherwise subsidiarity should prevail and specific arrangements ought to be worked out regionally, bilaterally or at the national level.

## Combining the Three Approaches

I have pointed out that each of the three approaches has its merits and its specific difficulties. The task is not to choose between them, but to combine them in intelligent ways. As an example let me consider how a multicultural conception of European citizenship might change the rules governing the acquisition of member

state nationality and Union citizenship.

Under present regulations all nationals of member states and only these are citizens of the Union. The member states are thus the gatekeepers for access to Union citizenship, which results automatically from acquisition of a member state nationality through naturalization, descent or birth in the territory. The fifteen members have very different rules for these modes of admission and the Union still regards nationality laws as a purely domestic matter of the member states. Yet those immigrants who have obtained a European nationality are free to move to another member state where they can exercise their rights as citizens of the Union (including the local franchise), while immigrants who have lived there much longer may be denied such privileges. From a postnational perspective a substantive status of Union citizenship cannot be a mere appendix to national membership and conditions of access must be more or less the same throughout the federation. Any long-term exclusion of a part of the resident adult population from citizenship conflicts with liberal democratic norms (see Carens 1989, Bauböck 1994). Rules for admission should therefore be harmonized towards the most liberal standards, e.g. a waiting period for naturalization of no more than five years and an automatic acquisition of nationality at birth for children whose parents have been long term residents in the country. To this should be added a uniform legal status for third country nationals, a European

"denizenship" (Hammar 1990) that disconnects many present rights of European citizens, such as free movement and access to employment or the local franchise, from nationality and ties them instead to legal permanent residence.

Once we have agreed on the need for harmonizing nationality laws, the multinational approach comes into play. It would favour retaining the formal link that derives citizenship of the federation from member state nationality. All present federations with the exception of Switzerland reverse this model and derive instead membership in the subunit from federal citizenship. However, in the EU this could only signal a problematic move towards a nested nation model. The present regulations, on the other hand, correspond to the idea of a "Europe of fatherlands" each of which has its own separate regimes for reproducing its membership and national identities. The specific multinational character of the EU could be well expressed by harmonizing admission to Union citizenship while making it still conditional upon acquisition of member state nationality.

The pluralistic model, finally, would support recognition of multiple citizenships as long as they reflect genuine social ties to several countries. Multiple citizenship gives a legal expression to overlapping national identities that do not fit neatly into the nested patterns of federal communities but cut across their internal and external borders. All EU member states accept multiple nationality when it results from mixed

birth, but some of them still require the renunciation of a present nationality as a precondition for naturalization. This is a major obstacle for some groups of immigrants who are afraid of losing rights in their home countries (such as the right to inherit or own land and, most importantly, the right to enter and live in this territory). Multiple citizenship between a member state and a third country presents no particular problems for a federal conception of Europe. Standard models of federation exclude, however, simultaneous membership in several constitutive units. As a provincial citizen of Lower Austria I have no franchise in the federal province of Vienna. If I took up residence in Vienna I would automatically loose my right to vote in Lower Austria and would become a full citizen of the capital without any declaration of intent. This amounts to a latent multiple membership in all units with an active membership only in the unit of current residence. This rule is not merely designed to prevent multiple voting or cashing in of other benefits of provincial citizenship, it prevents also provincial authorities from discriminating against citizens of other parts of the federation. Still, the multinational conception of a federal Europe that I have advocated would make such automatic acquisition through residence alone (without any declaration of intent) rather problematic.[8] A mutual recognition of national identities would be better served if citizens of the Union who settle in another member state are treated much like immigrants from third countries who

should have easy access to the host state's nationality but on whom it cannot be imposed against their will.[9]

Rules of admission are a particularly important element of multicultural citizenship because they provide a direct link between minority policies and a transformation of the wider political community itself. Yet these two questions must also be addressed separately and in their own terms. As the European Union moves closer to federation it will have to adopt policies concerning the status and rights of national, ethnic, racial and religious minorities and it must develop a coherent vision of a common political identity that could integrate the various political communities of which it is composed.

## Conclusions

Transforming a union of democratic states into a supranational federation is a unique endeavour. All historical precedents have involved nation-building efforts at the federal level. This route is blocked for the European Union. Political integration must not be misunderstood as an attempt to build a European nation. One should not even aim at creating hyphenated identities of the American sort (Austro-, Italo-, Greco-Europeans…) that would turn present national identities into ethnic prefixes of a European one. What we need instead is the opposite kind of transformation: a pluralisation of our national identities so that they include a European element alongside many other ones.

Building a federal polity is necessarily an exercise in identity politics. The challenge is how to combine postnational, multinational and transnational identities so that all can see themselves as belonging to a larger European community. This task is not like constructing a European house from building blocks of various national colours. Existing national identities must also be transformed to become compatible with the integration project. In order to fit together in a supranational federation European nations have to become internally more pluralistic. They must learn to understand and accept their own heterogeneity that results from recent immigration and old minorities.

A European federation must be postnational in the sense of creating a political community where citizenship is a relevant identity but is no longer associated with a particular national territory, history and culture. Creating this new type of polity will require more than institutional reform and even more than a federal constitution. Democratic representation at federal level involves the citizens more directly in far-reaching collective decisions. The price for democratising the Union is that we will see much more political polarisation on European issues. Given the multinational structure of the federation it is not difficult to predict that a lot of this polarisation will be along national lines rather than along lines of economic interest that cut across these internal borders. It would be an illusion to believe that fostering constitutional patriotism in a federal Europe could overcome this danger of nationalist mobilisation. In such a federation the antidote to nationalism is multinationalism, i.e. a mutual public affirmation of national identities that undercuts the tendency to put one's own nation above all others. However, such multinationalism also preserves the potential for the disease that it is meant to cure. It creates the image of a Europe that is perpetually divided into national communities that have been independent before and could become so again when the federation no longer satisfies their particular aspirations. Multinationalism needs to be complemented with a pluralistic approach that recognizes the overlapping and cross-cutting identities of sub-national and transnational communities.

## Notes

1 For the full text of the speech see http://www.auswaertiges-amt.de/6_archiv/index.htm. Proponents of cosmopolitan federation at the global level make a similar argument. See for example Höffe (1999).

2 For a critique of this distinction see Yack (1996) and Levy (2000).

3 Canovan (1996) shows how theories of democracy have tacitly presupposed stable boundaries and collective identities that cannot themselves be decided by democratic procedures but are the outcome of historic processes of nation-building.

4 There is a parallel here with Benedict Anderson's analysis how the career patterns and travel itineraries of colonial administrators in Latin America shaped their national consciousness. The artificial borders of the colony determined the range of their travels and were thus endowed with meaning. And if they were Creoles born in the colony the geographic end-point of their career paths was the capital of the colony rather than the metropolis of the Empire (Anderson 1983: 55–60).

5 In the 1970s Canada's pemier Pierre Trudeau attempted to forge an all-Canadian sense of nationhood based on multiculturalism and bilingualism "from coast to coast". Québecois perceived this as an attack on the special status of their language and province (see Laforest (1995).

6 Unresolved minority conflicts among the twelve present candidates for enlargement include the division of Cyprus between its Greek and Turkish community, the position of Hungarian minorities in Rumania and Slovakia, of the large Russian populations in Estonia and Latvia, of Turkish and Macedonian minorities in Bulgaria and of Roma communities in most Eastern and Central Eastern European states.

7 The Tampere European Council of 15–16 October 1999 has quite explicitly established this link.

8 In multinational or multilingual states autonomous regions sometimes impose longer residence requirements before internal migrants from other regions acquire regional citizenship. For example, Italian citizens who move to South Tyrol must wait for four years before acquiring the regional franchise.

9 I think that this conception would also allow for multiple active memberships so that, for example, an Italian citizen who has acquired French nationality could vote in elections in both countries.

## References

**Anderson, Benedict** (1983) Imagined Communities. On the Origins and Spread of Nationalism, Verso: London.

**Bauböck, Rainer** (1994) Transnational Citizenship. Membership and Rights in International Migration. Edward Elgar: Aldershot.

**Parekh, Bhikhu** (2000) Rethinking Multiculturalism. Cultural Diversity and Political Theory, Macmillan: London.

**Parekh, Bhikhu** (1995) 'Cultural Diversity and Liberal Democracy' in: David Beetham (ed.) Defining and Measuring Democracy, Sage: London.

**Canovan, Margaret** (1996) Nationhood and Political Theory, Edward Elgar: Cheltenham, UK.

**Carens, Joseph H.** (1989) 'Membership and Morality', in Rogers Brubaker (ed.) Immigration and the Politics of Citizenship in Europe and North America, University Press of America: Lanham.

**Favell, Adrian** (1998) Philosophies of Integration. *Immigration and the Idea of Citizenship in France and Britain*, Macmillan: Basingstoke.

**Gans, Herbert** (1979) 'Symbolic Ethnicity: The future of ethnic groups and cultures in America', Ethnic and Racial Studies 2: 1–20.

**Glazer, Nathan** (1997) We Are All Multiculturalists Now, Harvard University Press: Cambridge, Ma.

**Hammer, Tomas** (1990) Democracy and the Nation State. Aliens, Denizens and Citizens in a World of International Migration, Avebury: Aldershot.

**Höffe, Otmar** (1999) Demokratie im Zeitalter der Globalisierung, Beck: München.

**Kraus, Peter** (1998) 'Kultureller Pluralismus und politische Integration: Die Sprachenfrage in der Europäischen Union', Österreichische Zeitschrift für Politikwissenschaft, vol. 27, no. 4: 443–458.

**Kukathas, Chandran** (1992) 'Are there any cultural rights?', Political Theory, vol. 20, no.1: 105–139.

**Kukathas, Chandran** (1997) 'Cultural Toleration', in Will Kymlicka and Ian Shapiro (eds.) Ethnicity and Group Rights, Nomos XXXIX, Yearbook of the American Society for Political and Legal Philosophy, New York University Press, New York: 69–104.

**Kymlicka, Will** (1995) Multicultural Citizenship. A liberal theory of minority rights, Oxford University Press: Oxford.

**Kymlicka, Will** (1989) Liberalism, Community, and Culture, Oxford University Press: Oxford.

**Laforest, Guy** (1995) Trudeau and the End of the Canadian Dream, MacGill-Queen's University Press: Montréal.

**Levy, Jacob** (2000) The Multiculturalism of Fear. Oxford University Press: Oxford, forthcoming.

**Levy, Jacob T**. (1996) 'The Multiculturalism of Fear', Critical Review, vol. 10, No.2: 271–283.

**Lijphart Arend** (1984) Democracies. Patterns of Majoritarian and Consensus Government in Twenty-One Countries, Yale University Press: New Haven.

**Miller, David** (1995) On Nationality, Oxford University Press: Oxford.

**Taylor, Charles** (1993) Reconciling the Solitudes: Essays on Canadian Federalism and Nationalism, McGill-Queen's University Press: Montréal.

**Yack, Bernard** (1996) 'The Myth of the Civic Nation', Critical Review vol. 10, no.2, spring 1996: 193–211.

**Young, Iris Marion** (1990), Justice and the Politics of Difference, Princeton University Press: Princeton.