Towards Transnational Studies: World Theories, Transnationalism and Changing Institutions

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1. Introduction

A transnational perspective should be able to deal with both new social formations \textit{sui generis}, such as transnational social spaces, and how ‘old’ national, international and local institutions acquire ‘new’ meanings and functions in the process of cross-border transactions. By now, there is a voluminous literature dealing with the emergence and above all the forms of transnational activities of migrants and the consequences for the social integration of immigrants (for summaries, see, e.g. Levitt and Jaworsky 2007). In a nutshell, most studies have focused on migrant agency, even forgetting significant others, such as those left behind in regions of emigration, for example, relatively immobile persons (on this latter notion, see Hammar et al. 1997). Many studies have tried to come up with typologies of transnational life without sustained efforts to arrive at explanations of the underlying social mechanisms.

Typical are also general comments that means of modern mass communication have provided the framework for building transnational social spaces. How the conjoined processes exactly work are usually not at the center of attention. Most transnational analyses have focused on migrant practices but have neglected the transformation of institutions in transnational spaces and how these changes interact with the transnational life worlds of migrants. A first step has been taken in pointing out that migrants contribute to broadening, enhancing or intensifying transformation processes which are already ongoing (Vertovec 2004: 972), such as migrant financial and social remittances impacting upon social transformation in regions of origin, or states rethinking citizenship legislation. Now we need to take the next step and ask how institutions have been changing.

If transnational ties and formations are consequential for social transformation, we also need to find indications about changing institutions in the national, international and local realms of transnational spaces. From this perspective we need not only look at transnational ties and formations across the borders of national states – with various types, such as diffusion, families, associations, (issue) networks, organizations and communities, such as diasporas – but also the repercussions for institutions. This should be self-evident from the very definition of transnational social spaces, which can be defined as sustained and continuous ties and their concatenations in networks, groups, organizations, and communities across the borders of national states – and with institutions on all levels always being part of such social spaces. In order to be conceptually and politically significant, analyses of transnationalization as sets of
sustained cross-border processes and transnationality as an awareness of such processes need to go beyond building typologies and move towards explanations.

Therefore this paper pursues a twofold agenda. First, it argues that both concepts of transnationalism (transnational social spaces/fields/formations) on the one hand, and world approaches (world society and world polity theories)\(^1\) on the other hand could be useful optics to describe different aspects of transnational processes, boundaries and identities and thus social transformation of institutions, practices and cognitions. While these two sets of approaches indeed pursue different agendas, they give us valuable insights into transnationalization and transnationality. Both world theories and transnationalist perspectives are elements of a field we could call transnational studies. Transnational studies should include theories and concepts put forward by world theories and by a transnationalist optic.\(^2\)

Second, both world theories and a transnationalist optic can be used to ask about the social mechanisms (Bunge 1997, Elster 1989: 3-10, Hedström and Swedberg 1997) by which transnational processes and social transformation work, on a systemic or macro-level (e.g. path dependency), a collective or meso-level (e.g. social closure, opportunity hoarding and brokerage), and on a cognitive or micro-level (e.g. symbolic recognition). Social mechanistic explanations are not law-like statements but offer context-dependent explanations. In this way these disparate theoretical and conceptual approaches may complement each other, without implying that one needs to create one big, overarching theory dealing with transnational processes. To give examples of social mechanisms to be identified when using transnationalist and world approaches, I use the examples of diaspora and above all tolerance towards dual citizenship.\(^3\)

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\(^1\) For the fruitful use of world systems theory for transnationalism, see Basch et al. (1994) and several contributions in Smith and Guarnizo (1998). Yet the economistic bias of world systems theory reduces its potential for the analysis of political (see e.g. Zolberg 1983) or cultural processes.

\(^2\) I am using the term transnationalism for lack of a better term – despite its obvious shortcomings: ‘-ism’ always suggests an ideology. Yet it should be mainly a (social) scientific optic. Also, even if one uses this politicized term, it is not clear who would adhere to such an ideology: researchers, migrants, other observers, etc.

\(^3\) At this point a clarification of how the key term transnationalization differs from internationalization and globalization is in order. These remarks also apply to the terms transnationality, internationality, and globality. **Transnationalization** refers to sustained cross-border ties, events and processes across the borders of several national states. Both non-state agents and states participate. Examples include transnational social spaces (see below) or the UN Global Compact. A lot of emphasis is on social formations overlapping national states. This is different from **internationalization**, which deals with ties, events and processes involving almost exclusively states and their agents. An example would be international regimes, for example, the (partial) regime protecting refugees, based on the Geneva Convention (1951) and subsequent Protocols. **Globalization** differs from both transnationalization and internationalization in that it takes a bird’s eye view. It takes world spanning structures as a point of departure and asks how such structures and associated processes impact and shape lower-level structures and processes, for example, on the level of national states and below. In a way, it moves from the ‘outside’ towards the ‘inside’. In certain regional contexts globalization is reflected in more delimited developments, such as EU-ization in Europe. -- World systems theory, world polity theory and world society
The first section outlines in exemplary ways two types of world theories mentioned, looking at world society theory and world polity theory as examples of macro-structural theories. The argument is that macro-structural theories emphasizing functional differentiation of world society or the diffusion of rational norms in the world polity open a panoramic view for transnational settings but cannot account for power, conflict and issues of legitimation. The second section then outlines transnationalist approaches. Such an optic is helpful to start thinking about the reorganisation of social practices. Nonetheless, there are also considerable lacunae, in particular the underplayed focus in connecting transnationalization and transnationality to institutional change. Transnational approaches need to be extended to specify the social mechanisms by which boundaries and identities are redrawn in the context of sustained cross-border interactions. The utility of this extension is shown in the discussion of the term diaspora. The very fuzziness of the term is a result of constantly changing socio-political boundaries and transactions across and within such boundaries, which constitute (situational) identities. The third section uses one example – growing tolerance of dual citizenship – and views it from both world polity theory on the one hand and a transnational approach looking at boundaries-identities on the other hand. It specifies the social mechanisms on the macro-, meso- and micro-levels, which have operated to bring about increasing tolerance (and may also account for reversals in the future). The fourth section draws methodological implications, sketching the contours of two methodologies for transnational studies, namely encompassing and incorporated approaches. The first corresponds to world theories, the second to a transnationalist optic. The paper concludes with reflections on whether and under what circumstances ‘old’ concepts such as citizenship are adequate in capturing the impact of transnationalization and transnationality.

2. The World Explained: World Society Theory and World Polity Theory

Sociology as a discipline lagged behind political science in empirical globalization studies, which document an increasing flow of resources across the borders of national states (cf. Held et al. 1999). Yet sociology has to offer two sets of approaches which go beyond empirical theory also share this aspect of the globalization view. However, these three sets of theories are different from globalization studies in that they claim to go beyond the empiricist thrust of the latter, and enlighten the academic world with explanations.

In focusing for illustrative purposes on dual citizenship, which overlaps national states in transnational social spaces, this paper is concerned with how ‘old’ institutions acquire ‘new’ meanings. It would require another paper to deal with ‘new’ institutions such as European Union citizenship.
observations of globalization studies. First, there is a rich mine of various theories conceptualizing global exchange and communication processes. Marxist world systems theory, neo-functionalist world society theory and neo-institutionalist world polity theory are the most prominent exemplars. Moreover, there are transnational approaches. It is almost needless to say that all these approaches are heavily interdisciplinary.

World approaches posit a coherent, self-sustaining entity such as world society or an economic world system, and focus on processes of constant differentiation between systems and environment, or, in older versions, identify structures within that entity by their location within the entity as a whole. While such approaches give answers to the question of how to connect small-scale and large-scale social processes, they face enormous difficulty of identifying and bounding relevant systems. By contrast, transnationalist approaches take bounded transactions among social sites as points of departure. In general, transnational analysis is oriented towards analysing enduring and continuous features of transactions between specific social locations across the borders of states.

The following two sections outline two prominent world theories – world society and world polity theories – and contrasts them with transnationalist approaches. The main argument is that world theories are helpful in conceiving social structures beyond the national state as part of larger processes. However, it if we want to understand the formation of transnational formations, the drawing of boundaries between groups, changing collective identities and altered boundaries of political institutions such as citizenship, it is important to also bring in another perspective, one which looks at transnational boundary-identity making.

*World Society Theory: Functions and Systems*

World society theories view societal processes from the vantage point of an already existing world society. In Luhmann’s theory of functional differentiation (Luhmann 1977) it is the global communicative connectivity which forms the basis of world society. Society is the most encompassing social system, defined as the sum total of all communication connected to further communication. As communication is geared towards global connectivity, only one society exists: world society. World society theory is based on a theory of functional differentiation. According to this theory, societal spheres are organized in subsystems, such as the political, legal, economic, or educational systems, which fulfil certain societal functions and which operate largely autonomously. In a functionally differentiated society, each
subsystem fulfils one specific function coded in a binary way. For example, the political system decides on power or not to have power, the science system on truth or not truth, the economic system on money or not to have money, and so forth. Such functional differentiation is a form of homogenization. Social formations other than those which are functionally differentiated, such as segmented or stratified forms, only play a secondary role in world society. In other words, world society is the inevitable result of functional differentiation (Luhmann 1997: 809). It has replaced the national society (congruent with the national state) as the main unit of analysis. In this view the state has no privileged role in social steering anymore but is part of the political system, which is one among many. Systems-based world society theory thus assumes that the master mechanism of functional differentiation makes concepts such as class and stratified assumptions about social inequality obsolete. Binary concepts such as inclusion into or exclusion from societal systems replace earlier notions, and thus do not pay attention to ‘old’ concepts such as dimensions of citizenship, for example, equal political liberty. In an age when the postulate of equality is claimed to have universal validity, world society in this view offers the widest scope for an analysis of domestic and global inequality. Also, world society theory makes notions such as (transnational) social space obsolete, as it is an outdated mechanism.

World Polity Theory: Rational Organizations

In the world polity theory of John W. Meyer and the Stanford School, the starting point is the existence of a world culture, which is culture exogenous to local contexts, worldwide, and based on the premises of modern rationalization in Max Weber’s sense (Meyer et al. 1997). This world culture is rationalistic in that it does not primarily consist of values and norms which are debated and towards which actors orient their behaviour, but “cognitive models”. Actors accept such standards, that is, cognitive models, even though they may not be ready to act according to the standards prescribed; for example, in taking over English language curricula without a suitable overall curriculum. In essence, world polity theory prioritizes the rational orientation of organizations.

Problems with the World Optic

There are various problems with both world society and world polity theory. First, these theories postulate a priori and without further systematic empirical consideration that a world society or world polity actually exists, and that it matters. We can certainly observe the emergence of global institutions, for example, in the realm of political governance, such as the
United Nations and its sub-organizations or the World Trade Organisation (WTO). Other prominent examples are the national state as a universal principle of political organisation, the use of money as a medium of economic exchange, and global standards in travel, time and communication. Yet such global structures or globally diffused institutions only exist in selected policy domains. While some policy fields such as trade have been regulated by a complex and evolving international regimes which may amount to elements of global governance, cross-cutting issue areas such as geographical mobility are a long way from being regulated by such mechanisms. Social protection and social insurance in many parts of the world are just one crucial example (Faist 2008a). Also, there is no international or even global migration regime. In the realm of the United Nations, various UN agencies compete for competence in these fields. Even if we turn to the universal semantics of human rights, rule of law, democracy or gender equity – terms which fulfil the function of meta-norms and are thus the favourite objects of analysis by world society theorists – we observe that they do not rule universally.

Second, both world society and world polity approaches are top down views, which define the properties of lower order subsystems. There is little room for thinking about local autonomy. Moreover, according to such views, it is modern organisations and networks which rule the societal world, while social formations such as families, tribes, and communities play a negligible role, if at all. World polity theory maintains that cognitive models shape the actors although it is plausible that it is not only the world polity shapes actors but it is also agents who shape world polity. For example, the very fact that the World Bank has championed the diaspora model of development has very real consequences for conceiving development. Different agents hold divergent notions of development. The notions of the World Bank, changing over time, are different from those of grassroots organizations. In essence, it is not clear why some patterns are more or less universal while others are not. We can name many local or national patterns which do not necessarily go back to global models. For example, states in the OECD countries have employed very different models of incorporating migrants at the national level, ranging from assimilationist to multicultural paradigms. Moreover, states have viewed very differently the desirability of migrants’ transnational ties. While former colonial powers with a long experience in penetrating developing countries have seized quickly upon the idea of co-development, that is, employing migrants as development agents, others, often characterised by less intense transnational and international ties, have only

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5 This term is used here to provide for the possibility that actors effectively influence the social world.
recently started to think about such models. Examples for the former category are national states such as France, the UK, Spain and the Netherlands, for the latter Germany, Austria and Sweden.

Third, world society theory in its neo-functionalist incarnation neglects the crucial aspect of legitimation and thus the whole realm of normatively bounded agency (Peters 1993). And the world polity approach suggests that actors reap benefits from adapting to cognitive models such as the mainstreaming of tertiary education models, for example, the “Bologna Process” in the European Union. Political conflict over the very definition of such processes is merely semantic. However, to reduce the analysis of social and societal formations to instrumental concerns, and to occlude normative and ethical or expressive dimensions is to truncate the rich variety of the orientation of agency. Conflicts over whether social orders or systems are legitimate are a driving force of social change and transformation (cf. Finnemore 1996). For example, political agents active in pushing for gender equity criticize existing political arrangements and justify their strategies by reference to overall meta-norms such as human rights. In a similar way, those diasporists trying to establish a national state from abroad through secession may refer to norms such as national self-determination. In these two very different cases it is the legitimacy of existing orders which is at stake, both on the level of empirically observable acceptance of authority and power and on the level of normative criteria used to evaluate institutions.

Despite these common shortcomings, there are differences in how useful the two theories are for transnational analysis. World society theory does not (yet) offer the concepts needed to engage in systematic empirical research on transnationalization and transnationality. By contrast, world polity theory offers concepts such as the diffusion of organizational models and norms (e.g. human rights) which can be empirically operationalized. Ultimately, the litmus test for the applicability of such theories for transnational processes is their ability to suggest social mechanisms which help to understand the changes in ‘old’ institutions (and the emergence of ‘new’ ones). Before doing so, the other conceptual approach needs to be discussed, the transnationalist optic.

3. The Transnationalist Optic
To start with a general observation, the term “trans-national” suggests first that something is to be overcome, namely the national, as in moving beyond methodological nationalism (‘trans’). Yet, in the same breadth, it draws attention to what it aims to overcome from a methodological perspective (‘nation(al)’) is in productive tension with the global (cf. Ong 1999). This tension is not defined away as in neo-functionalist world society theory, in which the national state is simply an anomaly in a world of functionally differentiated systems, such as politics, arts, education, economy, and sciences. Instead, the transnationalist perspective is able to look both at new social formations *sui generis*, such as transnational social spaces, and at how old national institutions acquire new meanings and functions in the process of cross-border transformation. In this latter respect, which is the focus of this paper, it has more affinity with world polity theory.

Transnationalist views thus argue against a simplistic top down world society or world polity version of global or glocal conditions, which suffer from a neo-functionalist oversimplification in the first case and an exogenous rational actor model in the latter. Transnationalist approaches certainly do not form a coherent theory or set of theories. They can be more adequately described as an optic, which has found entry into the study of manifold cross-border phenomena. These are usually not connected to each other: An incomplete list would figure, for example, transnational terrorist and criminal networks, transnational organized crime (Shelley 1995) and wars (Kaldor 1999), transnational religions and communities (Rudolph 1997), transnational financial flows (Held et al. 1999), transnational viz. global commodity chains (Gereffi 1994), transnational nongovernmental organizations (Boli and Thomas 1997) and transnational social movements (Kriesberg 1997), transnational networks and counterhegemonic globalization (Evans 2000), transnational feminist praxis (Naples 2002), transgovernmental relations (Slaughter 1997), and transnational (cultural) diffusion (Kaufman and Patterson 2005). Closer to migration, there is also a variety of often fuzzy terms, which nonetheless share a focus on migrant agency: transnational social spaces, transnational social fields (Basch et al. 1994), transnational social formations (Smith and Guarnizo 1998), and transnational communities (Portes et al. 1999); the latter term is sometimes used interchangeably with diaspora(s).

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6 To assert that ‘transnationalists’ proclaimed the withering away or the decreasing significance of the national state (Koopmans and Statham 2001; Waldinger 2004) is simply incorrect. Obviously, these authors confuse transnationalism with post-nationalism. Post-nationalism, as used in concepts such as post-national membership (e.g. Soysal 1994), can be seen as a derivate of world polity theory.
The Oxford Dictionary of English dates the emergence of the term “transnational” to ca. 1920, documented with a quotation from an economic text that saw Europe after World War One characterized by its “international or more correctly transnational economy” (ODE 2003: 1762). Indeed, the term re-emerged in the late 1960s to denote increasing economic and political interdependence between industrialized countries (Keohane and Nye 1977; for an updated extension, see Risse-Kappen 1995). Transnational relations in political science pointed beyond the state-centrism and the billiard-ball models of international relations. In short, it held that the non-state relations crossing the borders of states would lead to an ever-growing interdependence between states (Nye and Keohane 1971). Preferred fields of analysis were large-scale and powerful actors such as multinational companies, and, to a lesser extent, political parties such as the Socialist International. It found its extension in Neo-Gramscian analyses of what is sometimes labelled as neo-liberal ideology, and social groups putting forward such ideas, for example, the “transnational capitalist class” (Sklair 2001).

The latest round of the term transnational, which started in the late 1980s and early 1990s, asked about migrants as agents in constellations of increased cross-border flows (Basch et al. 1994). It is within this most recent context that transnationalist approaches in migration and immobility studies have flourished.

Transnational social formations – also: fields, spaces – consist of combinations of social and symbolic ties and their contents, positions in networks and organisations, and networks of organisations that cut across the borders of at least two national states. In other words, the term refers to sustained and continuous pluri-local transactions crossing state borders. Most of these formations are located in between the life-world of personal interactions, on the one hand, and the functional systems of differentiated spheres, such as the economy, polity, law, science and religion. The smallest element of transnational social formations is transactions, that is, bounded communications between social agents such as persons. More aggregated levels encompass groups, organisations and firms. It is an empirical question whether such transnational transactions are global or regional.

Transnational perspectives on cross-border societal formations mostly relate to the concepts of fields and spaces. The notion of fields refers to the inner logic of social action of functionally differentiated realms. Although Pierre Bourdieu’s notion of fields points towards the internal logic of systems, such as the economy, polity, science or law, his understanding
does not presume an evolutionary and linear logic of a trend towards a functionally
differentiated world society. In this view the boundaries of a field are fluid and the field itself
is created by the participants, such as persons or organisations, who struggle for social
position (Bourdieu and Wacquant 1992). The notion of transnational social fields is thus
concerned with issues of agency: “We define social field as a set of multiple interlocking
networks of social relationships through which ideas, practices, and resources are unequally
exchanged, organized, and transformed.” (Levitt and Glick Schiller 2004). Moreover, the
concept of social field in general and transnational social fields in particular calls attention to
the ways in which social relationships are structured by power. The notion of transnational
social space is built on this notion and adds the spatial dimension of social life. Nonetheless,
the changing boundaries of transnational fields are usually not systematically explored.

The notion of social space in particular is useful to show the value added of a transnational
approach. Social space has been neglected for several decades in the social sciences (Faist
2004). In world theories time definitively trumps place. The now often-used description of the
world as a “space of flows” is a creative reformulation of Marx’s and Engels’ famous dictum
on capitalism: “all that is solid melts into air”. The latter statement is still the clearest
expression of the claim that there is an annihilation of space by time (Marx and Engels 1972).
World society theory argues that migration can be substituted by routines (Stichweh 2005).
The core argument is that functional differentiation leads to the disappearance of social space
and the diminishing relevance of face-to-face communication in social systems. In a way, it
would be the end of geography. The counter-argument is equally simple but based on
empirical evidence: social geographers have firmly established that face-to-face contact is the
main functional reason for the spatial clustering of knowledge and skills. This is exactly why
nowadays there is great fanfare about clusters of excellence in academia, such as Oxbridge in
UK, or clusters of growth in industry, such as the Rhine valley, or Shanghai. Other examples
are international financial centres in places like New York, London or Frankfurt (see, for
example, Thrift 1996). We observe a spatial clustering of practical knowledge, tacit
knowledge and scientific knowledge. This trend is tied to production processes, which require
simultaneous inputs and feedbacks (Sassen 2006: 72). Social spaces expand and direct
contacts grow as technological possibilities grow, and the short-term and even long-term
mobility of persons certainly does not decline but has steadily increased. It is not only true in
the world of business but also in the life-worlds of migrants, new telecommunications that
technology is a complement to rather than a substitute for face-to-face contact. It appears that
information is still an “experience good” and that face-to-face contact still helps to build the trust needed to close deals (Rauch 2001), or to build reciprocity and solidarity in kinship groups. This example indicates that spaces of flows – not only those of persons but also of goods – are embedded in spaces of places. In other words, intensive and continuous cross-border flows of persons, ideas and goods do not necessarily result in a de-bordered world. Instead, boundaries and borders are constantly redrawn.

**Lacunae in the Transnationalist Optic**

Innovative social anthropologists around Nina Glick Schiller placed migrants and their ties and collectives firmly at the center of an agency-oriented approach (Basch et al. 1994). Yet Glick Schiller’s macro-structural positioning of transnationalism in world systems theory got lost very soon when picked up by subsequent analysts. One important strand of this thinking has become social relational, linking up with migration and migrant network analysis (for many, see Portes et al. 1999; cf. Vertovec 1999), and, partly, with social constructivist ideas – called “constructivist transnationalism” (Khagram 2004). However, this perspective has not been systematically presented as a perspective involving boundaries (including borders) and identities of agents involved. Moreover, it has not engaged in activities presenting the mechanisms of how ties, networks and organizations change the institutions involved.

**A Modest Proposal: Focus on Changing Boundaries, Identities and Transformation**

It is therefore helpful to explicate how boundaries and identities change and by which mechanisms such transformations occur. Identities in such a perspective are quite malleable (Tilly 2005). In essence, there are as many identities as there are relations or ties with others. Identities reside in relations with others. Strictly speaking, every person or group has as many identities as it has relations with other persons or other collectives. Persons and collectives shift from identity to identity as they shift relations, and identities may thus differ according to context. Such identities refer to a boundary separating the various agents and relations either within or across such boundaries. Needless to say, these considerations are crucial for the analysis of transnationalization and transnationality. Social boundaries interrupt, divide, circumscribe, or segregate distributions of persons and groups within social spaces which cross the borders of national states. Shifting boundaries and identities are indications of social transformation of institutions, practices and cognitions.
The interplay between identities and boundaries can be nicely captured in the debate on the “newness” of transnational social spaces. Some transnationalists early on claimed the newness of such phenomena. It did not take long until historically minded social scientists showed convincingly that not only return migration and occasional visits to home regions have always existed (Foner 2001). Going beyond, “transnational communities” with dense internal ties, both within states of immigration and towards regions of emigration existed. Max Weber, for example, spoke of „Auslandsgemeinschaften“ of German immigrants in South and North America which introduced the concept of ‘leisure’ (Freizeit) through choirs and gymnastics clubs (Weber 1980: 234). To take an example from the political realm, participants in diasporas, such as Russian Jews or Armenians, have been active in homeland politics since the idea of a national state has taken hold.

Certainly, these cases were not as widespread as they are today, and were not further encouraged by means of instant long-distance communication. Yet to claim that above all technological means have encouraged transnational ties, as most transnationalist scholars stubbornly repeat, is to declare the obsolescence of social science. It has been above all the right towards collective self-determination, and boundary shifts in thinking and acting upon identities which have produced the new trends. The premature semantic death of multiculturalism in the public debates of Europe and parts of North America – and the alleged return of assimilation – is a claim against all empirical evidence. Take only the official policy of the EU. It espouses an understanding of immigrant integration in the European Union (EU) as a “dynamic two-way process of mutual accommodation by all immigrants and residents of Member States.” (COM (2005) 389 final) That the term multiculturalism is being gradually replaced by ‘diversity’ in EU documents, in transnational platforms and in nationally bounded policy discussions is no indication of the decline of the tolerance towards pluri-local identities. Actually, the reverse could be the case. There is indeed a stark contrast between the rabid nationalism faced by immigrants at the turn from the 19th to the 20th century when compared to a hundred years later. Only in this semantic field could technological opportunities make for increased “community without propinquity”.

Diaspora as a case of making boundaries and shifting identities
An even more telling case is the debates on the term diaspora. It is an important example of redrawing boundaries and identities. According to the preface for Diaspora: A Journal of Transnational Studies, diasporas are the “emblems of transnationalism” because they
“embody the question of borders, which is at the heart of any adequate definition of the Others and the nation-state” (Tölölyan 1991). A term once used to describe Jewish, Greek, or Armenian dispersion, diaspora now captures a larger semantic domain including the experiences of immigrants, expatriates, refugees, labour migrants, and exile, overseas and ethnic communities. The term has become so diffuse and empty of exact meaning that Rogers Brubaker suggests to expunge the term, along with ‘identity’, from our analytical toolkit. The reason given is that these terms have acquired too many meanings (Brubaker 2005).

Yet there is an alternative: we can start from the insight that people regularly and indeed constantly negotiate and deploy socially and thus relationally based answers to the “we” questions. Identities are transactional social arrangements. There is no use to reject the term diaspora because of the danger of “groupism” (Brubaker and Cooper 2001). Instead one should be aware that identities and thus collective representations of identities are constantly changing, being renegotiated. It is the task of sociology to shed light on how, i.e., by which social mechanisms, the boundaries are redrawn and identities remade. Such an approach also considers that one of the most important tasks of social scientists is to interrogate potentially homogenizing assumptions about social categories. Diaspora, along with nation, ethnicity, class and gender is one of them.

While in two earlier periods the term diaspora referred to the dispersal of Jews as a result of divine punishment, to be followed by a usage focusing on religious minority groups (Dufoix 2008), the current definitions and connotations all focus on changing boundaries and identities of a larger variety of categories. First, the term has undergone secularization and is now applied to ethnic, national and other categories. Gabriel Sheffer summarized the different approaches in a general definition encompassing the following criteria: belief in a common origin, maintenance of regular ties into the region of origin and transnational networks (Sheffer 2003, cf. Armstrong 1976). Other definitions speak of diaspora when dispersal – now not only forced but also voluntary – relates to at least two destinations. Cohen (1997) differentiates victim diasporas (Jews, Africans, Armenians, Palestinians, labour migration diasporas (Indians in the 19th and Turks in the 20th century), trade diasporas (Overseas Chinese and Lebanese) and imperial diasporas (British, French, Spanish, Portuguese). This move signalled a semantic shift from singular to plural, from diaspora to diasporas.
This pluralization is best expressed in poststructuralist viz. postmodernist interpretations of diaspora. The shift also meant a bifurcation of the discussion. Cultural studies exponents such as Stuart Hall (1990) and Paul Gilroy (1993) popularized an understanding of diaspora, which is defined by lateral connections (not necessarily towards home and host states) and has an “emancipatory” thrust. This perspective is of great interest not because of its allegedly liberating character – in a way, “we are all diasporists now” – but because it emphasizes the multiple identifications of actors and brings in both migrants and relatively immobile people. This idea is nicely captured by discourses on “DissemiNation” (Bhabha 1990) and “TransNation” (Appadurai 1996). The first refers to agents of all sorts engaged in cross-border practices (including social movement activists and migrants). The second could be fruitfully interpreted in the frames of state-citizen relations. The notion of TransNation may also correspond to manifold activities of emigration states since the mid-1990s to intensify, maintain or rebuild ties to their (former) citizens abroad. Policy examples include the toleration or even acceptance of dual citizenship, voting from abroad, and special forms of political representation of emigrants, for example in national parliaments – but also continuing repression of emigrants. Moreover, various countries have stepped up consular services abroad, such as Armenia, Eritrea, Ghana, India, Ireland, Croatia, Mexico, Nigeria, the Philippines – to name only the most obvious ones (for a systematic overview of state-diaspora policies, see for example, Gamlen 2006).

Diaspora is a particularly interesting field of analysis for transnational studies because it may constitute a way for members of categories to be defined both by their separation from and by their connection to the social life of emigration and immigration countries and locales. The boundaries reach across the borders of states but are also to be found within. One may usefully look at diaspora because it might give clues as to broader questions of which category is privileged in certain contexts: nation, religion, and so on. For example, quite a few cases of diaspora – Kurds, Armenians, Tamils – are engaged in long-distance nationalist projects, which usually involve essentializing identificational categories such as ethnicity.

The discussion of social mechanisms in the context of boundary-identity constructions is helpful to understand the limits of the notion of diaspora. Take a crucial social mechanism in this case, brokerage. The development cooperation industry has lately rediscovered the migration-development nexus, arguing that migration is not an expression of a ‘problem’ but a ‘solution’ to issues of development. Financial but also human capital and other assorted
remittances are meant to alleviate poverty and spur development in the countries out of which international migration originates. Critical voices add that highly-qualified migrants also contribute first and foremost to the development of developed countries. In this wonderful triple-win situation – migrants, countries of emigration and immigration – migrants themselves are considered to be the main agents of change, brokering between countries of immigration and (international) development organizations on the one hand, and the local populations to experience development on the other hand. The ideal-typical situation of a broker is to connect hitherto unconnected agents and reap corresponding benefits in the role of **tertius gaudens** (Simmel 1995: 297). In the case of the migration-development nexus, brokerage is a central mechanism, which is to be welcomed from both a neo-liberal view seeing migrants as individual entrepreneurs and grassroots activists who focus on collective agency (e.g. hometown associations) (Faist 2008).

However, seeing migrants as development agents and thus brokers underrates considerable difficulties. First, there are the ever present internal division within migrant groups. Second, there are conflicts of interest between migrants ‘away from home’ and relatively immobile persons ‘at home’. For example, empirical research on migrant associations in Southern California and their involvement in El Salvador indicates that the aims and concrete steps of development are contested between migrants and those left or staying behind in the regions of origin (Waldinger 2006). In essence, this means that problems of development cooperation building upon migrants are not fundamentally different from those problems encountered by traditional development organizations. This also implies that diaspora cannot be conceived as a homogenous community. Moreover, the finding suggests that a focus which goes beyond migrants to include relatively immobile persons helps to understand the mechanisms operative in transnational transactions.

This rather simple example of brokerage as a social mechanism in order to look at the transformation of migrants and migration as a ‘problem’ to claiming that the transnational practices of migrants are part of a ‘solution’ to development in all parts of the world suggests that this approach has considerable purchase. Going beyond this exercise, we need to see what can be explained by various theoretical approaches dealing with transnational phenomena. This task necessitates macro-structural world theories and a transnationalist approach. Above all, we need to identify the social mechanisms operative in changing boundaries and
identities, such as path dependency, social closure, opportunity hoarding and symbolic recognition.

4. Social Mechanisms in the case of Dual Citizenship

In the past, including the recent past, policy makers considered dual citizenship a problem. Leading politicians of previous centuries saw it as an abhorrence of the natural order, the equivalent of bigamy. Citizenship and political loyalty to the state were considered inseparable. Policy makers worried that dual citizen would not integrate in the country of integration and keep exclusive loyalty to the country of original citizenship. And in times of war in the 19th and early 20th century they feared “foreign” interference by citizens belonging to the enemy. Moreover, democratic legitimacy was at stake. Policy makers feared that dual citizenship would violate the principle “one person, one vote”. Also, diplomats pointed out that they could not protect their new citizen in the country whose citizenship the newly naturalized citizen also held. Yet over the last few decades an astonishing change has taken place: an increasing number of governments regard dual citizenship not as an unsurmountable problem for integration, legitimation, foreign policy and diplomatic protection but instead as a challenge that needs to be negotiated from standpoints ranging from pragmatic tolerance to active encouragement. Certainly, dual citizenship is not a completely new phenomenon but it is only recently that we have witnessed its rapid spread. More than half of all the states in the world, countries of immigration as well as emigration, now tolerate some form or element of dual citizenship (Figure 1). Even in countries which do not accept dual citizenship as a rule, such as Germany, Denmark or Iceland, the number and percentage of dual citizens is steadily growing.

Figure 1 about here

The question is not simply what causes dual citizenship to change in general, that is, the move towards a higher degree of tolerance over the past decades. Instead, the main questions are how, why, and with what consequences boundaries distinguish members from non-members or partial members. It is thus a case study of how political boundaries form and change, in this instance becoming more permeable. The world polity perspective is used to outline the broad contours of how dual citizenship changes as a result of path-dependent diffusion of human and gender rights through international law. Yet this analysis would remain incomplete if it
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would not include perspectives on the meso- and micro-level aspects of states and migrants dealing with dual citizenship.

**Macro-Level: Path Dependency**

Much of the literature on transnationalization is concerned with the social integration of migrants. Oddly enough, much less attention is paid to whether and how organizations or institutions of ‘mainstream’ or ‘majority’ categories of society adapt and change in the face of pluralizing society. To use a metaphor by Max Weber, we observe the ‘iron cage’ of integration opening up and new boundaries being drawn, as national states increasingly tolerate (not necessarily accept) multiple memberships, such as dual citizenship, or rejuvenate local or urban citizenship. The spread of such norms of membership is not primarily caused by migration as such. Instead, it is a slow and sometimes path-dependent development in international law which has filtered down, is resisted or embraced by national states in many ways. Nonetheless, the important point is that it is – among other things – the very universalization of legal norms.

World polity theory suggests that human rights norms spread from international into national law. Indeed, we observe a first type of path-dependency to this effect. Legal norms on statelessness and gender equity have acted as a lock-in mechanism, tying liberal-democratic national states to universal norms. Regarding statelessness the Convention on the Reduction of Statelessness in 1961 is now adhered to by all liberal democracies. With respect to gender equity the Convention on the Nationality of Married Women in 1957, the UN Convention against the Discrimination of Women in 1985 and the European Convention on Nationality in 1997 have been incorporated into national law. The two main consequences have been that women do not lose their citizenship upon marriage with a man of another nationality, and that children from bi-national marriages are entitled to dual citizenship. There has also been a second type of path-dependent mechanism, at least in the EU’s liberal democracies, namely a disincentive effect. On the national level, the concept of democratic legitimation provides two options to achieve the congruence of the demos and the resident population: extend political rights to non-citizens or ease naturalization. Dual citizenship has been a prime case for the latter. In many European countries national courts have strengthened the rights of non-citizen residents since the 1960s. Also, on the supranational level within the EU, the principle and thus mechanism of reciprocity among member states has led many states to strike down the renunciation clause when citizens of other member states naturalize. Emigration countries
have followed the lead of immigration countries, and have increasingly used dual citizenship as a means to relate to their diaspora.

Yet world polity theory analysis disregards the fact, however, that the increased toleration of dual citizenship has been a bumpy road indeed. Although there has been a seminal trend of liberalization in this case, many countries still do not recognize dual citizenship as a rule. Moreover, some countries have experienced long and protracted struggles over dual citizenship, for example, Germany and the Netherlands (Faist 2007). In short, world polity thinking cannot capture the evolution of human and citizen rights as contentious political processes. To simply overlook the salience of political contention and claims-making and the meta-norms of political and other forms of equality is to lose sight of the mechanisms driving conflicts around membership (on citizenship more generally, see Kivisto and Faist 2007).

Citizenship has been a fundamental process of boundary drawing, inclusion and exclusion across much of the world over the last two centuries. The struggles over and within political institutions such as citizenship regularly involve conflicting claims over what political identities have public standing (e.g. full member of a polity), who has rights or obligations to assert those identities, and what rights or obligations attach to any particular identity. In the case of dual citizenship the identities and thus memberships involved also concern transnationality, the identification with collectives cutting across the borders of national states. A transnationalist perspective asks the following questions: First, by what mechanisms are the boundaries of full membership in states (re)drawn, so that overlapping membership is tolerated? Second, what are the consequences of boundary drawings for plural identities? Such a perspective places the practices of agents at the forefront of analysis – involving governments, migrants and migrant associations, and international organizations.

Meso-Level: Social Closure and Opportunity Hoarding

Governments in general have used citizenship as a mechanism of social closure to distinguish between members and non-members. In the age of national states this meant the congruence of state authority, state territory and a state people (demos). The emergence of aliens with partial membership rights, so-called denizens, has provided dual citizenship with a new challenge, since their accession to full membership could go either through increasing rights without full legal membership or easing their access to full membership. Tolerance towards dual citizenship is obviously an example for the latter case, in which immigration countries
make it easier to retain original citizenship, naturalizing without renunciation. One prominent argument to rationalize this kind of liberalization by way of dual citizenship has been to promote social integration of immigrants through ensuring the congruence of the demos and resident population. All along this main argument has been sitting uneasily with the rights of emigrant citizens where the ‘genuine link’ between citizen and state is more tenuous. In so-called immigration countries the two sides, immigrants ‘inside’ and emigrant citizens ‘outside’ were even weighed against each other, as in the Netherlands and Sweden. Usually, states stipulate rules for emigrants and their children to retain citizenship. The categorical distinction of the mechanism of social closure has thus acquired the elements of a more gradual distinction.

For emigration countries instrumental concerns are squarely at the center of considerations. Countries with significant shares of emigrants, that is, emigration countries, have subsequently also adapted their citizenship laws, verging towards more tolerance of dual citizenships among their citizens abroad. The case of dual citizens in diasporas is an interesting case. There is thus a triangulation of exit, voice and loyalty (Hirschman 1970). International migration is a form of exit, mostly as an alternative to voice. Yet the involvement of migrants in development cooperation is a clear example of voice and requires loyalty. This is odd, since lack of commitment was part of exit in the first place. In other words, exit is an alternative to voice, and loyalty is a prerequisite for voice. But commitment exists, as evidenced by the activities of many a migrant group or an association, which is active across borders of states. The puzzle nears a solution if one considers that exit strategies in social formations important to migrants, such as kinship systems and states, usually only imply geographical exit and not a permanent loss of membership. This is different from exit as a customer from a firm, or exit as a member of a political party. Thus, the transition from regarding emigrants as ‘traitors’ to ‘heroes’ has been possible. Subsequently, emigration countries have changed their policies. A prominent example is the discursive and institutional changes the People’s Republic of China has implemented since the late 1970s. Discursively, the slogan to “serve the country” replaced the motto “return to serve” (Nyiri 2001: 637). A caveat is in order: In general, the relationship between state governments and emigrants outside the state territory is still ambiguous, and has not simply changed towards embracing the ‘diaspora’. Much of the ambivalence can be traced to the fact that emigrants with transnational ties constitute agents who are much less subject to political control than those persons and associations mainly residing in the respective state.
Two social mechanisms are important here. Both have reinforced the spread of toleration towards dual citizenship on the part of emigration countries. First, the mechanism of adaptation eases day-to-day interactions between governments and emigrants abroad. Although governments may still be distrusting the loyalty of (some of) their emigrants abroad, toleration has the advantage of adhering semantically to the ever increasing international credo of mobility as a resource for development – as evidenced by the (former) Global Commission on International Migration (GCIM) and the policies of the World Bank since 2002. Migration and thus also emigration have supposedly mutated from a problem signaling underdevelopment to a solution of the so-called development question (Faist 2007a). The second mechanism is emulation. It consists of taking over patterns and routines practiced by other governments of emigration states.

For migrants opportunity hoarding is a pragmatic strategy to exploit multiple ties across borders. Opportunity hoarding is a social mechanism which allows members of a category to control valuable resources which are prone to monopoly (Tilly 1998). In a comparative study, migrant respondents in Estonia, Finland, France, Germany and Portugal mentioned, in particular, the freedom to travel across borders and expanded opportunities in the labor market and concerning access to educational institutions (Kalekin-Fishman and Pitkänen 2007). Concerning the countries of origin, the retention of original citizenship grant immigrants privileged access to the territory and the economic sector, for example by retaining home country inheritance and property rights and entitlement of trade registering. Without dual citizenship – and statuses similar to it, such as the Turkish Pink Card – such privileges may be otherwise lost. This is the basis for opportunity hoarding: For example, retaining the citizenship of the home country benefit emigrants in cases of transnational entrepreneurship, when it is necessary to mobilize contacts across borders and draw on insider advantages, such as knowledge of local customs and language(s). It is the mirror image of opportunity hoarding in countries of immigration, where certain kinship groups occupy niches such as restaurants in particular neighborhoods, recruit labor through transnational chains, and set up these workers after a while with their own restaurants – always making sure that the new owners adhere to the rules of the game and repeat the previous pattern.

Micro-Level: Symbolic Recognition
Analysis needs to include the boundary-identity aspect of transnationality. Here, the cognitive mechanism of symbolic recognition is a prime example. First, many migrants commonly have attachments and involvements in two or more places across national state borders, and consequently they have plural identifications and loyalties. When dual citizens regard their citizenship(s) as an essential part of their identity, they often express emotional difficulties to decide which citizenship they would keep, if they had to give up one of them. The acceptance of dual citizenship may recognize the specific symbolic and emotional ties immigrants have. Socio-cultural transnational activities of immigrants can reinforce their self-images and collective solidarities. In these cases, they regard the respective state’s acceptance of dual citizenship as a kind of official legitimation of their pluri-cultural identity (Pitkänen and Kalekin-Fishman 2007). Second, the attachment or even loyalty of children with dual citizenship is facilitated if the respective state accepts or even embraces dual citizenship. This is mainly because the self-confidence in developing specific competencies related to a transnational background, such as bilingualism and inter-cultural role-taking are encouraged.

In Germany, for example, those who are dual citizens since birth – being children of bi-national marriages – regard dual citizenship as important for their process of integration. Moreover, it is exactly this category of dual citizens who identify themselves most often as European citizens (Schröter and Jäger 2007).

What does all of this add up to? Dual citizenship has been discussed here as an example of a national institution, partly changing its character in that the boundaries of political membership have partially become more permeable. The key is the multiplying of loyalties and cross-cutting identities. By increasing tolerance towards dual citizenship, national citizenship has implicitly transnationalized (tolerated), that is, responded to processes of transnationalization and transnationality. It is distinct from novel forms of citizenship such as EU citizenship. While citizenship as a mechanism of social closure has not changed its character in principle, its boundaries have become slightly more permeable – which is not to claim that such liberalization would not be irreversible in times of war and intense conflicts. At the very least, these processes strengthen cross-border mechanisms of opportunity hoarding in the economic and political realms. Also, these social mechanisms are reflected in cognitive mechanisms and awareness, such as symbolic recognition.

The mechanisms on the various levels – macro, meso and micro – constitute each other. One particularly interesting phenomenon is tensions between the levels. For example, it could be
that citizenship laws and regulations on the one hand, and the practices of migrants on the other hand are at odds with each other. To take an example from the meso- and micro-levels: In 2000 the German government decided to enforce the rule that the renunciation clause is to be observed. This means that those who naturalize had to give up their former citizenship before acquiring German citizenship (not regarding exceptions which amount to about 40 percent of those who naturalize!), and that these new citizens are not allowed to reacquire their former citizenship. Yet the latter is exactly what thousands of new German citizens of Turkish descent had been doing for years. In this case this practice did not entail significant material benefits for the migrants and their significant others, which they could also have acquired through the Turkish *Pink Card*, but mostly symbolic rewards. Nonetheless, in order to enforce the mechanism of social closure in the wake of a significant liberalization of German citizenship law in 2000, the German government – against the opposition of the Turkish government – decided to uphold the restrictive renunciation clause. This occurred not in spite of but perhaps because other citizenship rules were liberalized at the very same time.

5. Implications for Methodology: Two Methodologies of Transnational Studies

On a methodological level, transnationalist approaches, along with world society and world polity theories, aim to overcome “methodological territorialism” (Scholte 2000: 56), that is, conflating society, state and *territory*. Such methodological territorialism is evident in many analyses which prioritise state agency in the traditional Weberian trilogy of the congruence of territory, authority and people. In addition, transnational approaches also strive to overcome “methodological nationalism”, the conflation of society, state and *nation* (Wimmer and Glick Schiller 2003). The common denominator of all these methodological criticisms is the conflation of state, territory and people and the naturalization viz. reification of the nation. Corresponding to the two broad theoretical orientations used so far, there are two corresponding methodological approaches, which consider these methodological criticisms. In order to overcome the deficiencies, the broad outlines of a methodological transnationalism are necessary.

To start, it does not suffice to proclaim “methodological cosmopolitanism” (Beck and Szaider 2006), as this is a desirable or undesirable normative stance, depending on one’s inclinations and depending on how one defines cosmopolitanism. It does not yet give a methodological orientation, which can be translated into systematic research schemes. Here,
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historical sociology can give some clues. Most “world” theories focus on what Charles Tilly has called “encompassing comparisons”. The similarities and differences of the cases analyzed – such as states – are the attributes or behaviour of the units, or in the case of functional systems, one goes from systems downward to organisations and interactions. These units or subsystems are traced to their similar/different position within the overarching totality (Tilly 1984: 124), called world economy, international system of states, world society or world policy. For example, the Stanford school around John Meyer emphasizes a growing convergence among national cases as a result of a world-scale process of organisational rationalization. For example, national states around the world adopt the form of three-tiered school systems. Or take Immanuel Wallerstein, who focuses on a process of recurrent geographical differentiation among core, semi-periphery and periphery resulting from the unequal distribution of rewards in a capitalist world economy (Wallerstein 1983). Yet for both, (local) positions and the behaviour of agents are seen as the product of a unit’s or subsystem’s location in the system. In essence, the larger system has a steamroller-like quality transforming social relations at the local level along a theoretically expected path.

The strength of such an approach is to emphasize the constraints that the totality imposes on the range of possible action open to local actors. For example, it goes beyond conceiving migration and its consequences as discrete national or local events. The weaknesses are equally visible. It presumes a “whole” that governs its “parts”, or a system determining the operations, and occludes processes of borders and boundary drawing as reflected in the transnational practices of migrants and relatively immobile persons. Thus this approach neglects that the units of the system cannot always be part of an initial ‘mental map’ because they are themselves constructed, and this process of construction is itself a critical part of the story of transnationalization and transnationality. Moreover, it excludes a priori a situation in which local action (agency) significantly impacts local outcomes, much less a situation in which local agency impacts the operation of the system as a whole (Silver 2003).

Methodological transnationalism would need to add the strategy of “incorporated comparison”, a strategy in which the interactions among a multiplicity of subunits of a system are seen as creating the respective transnational or global system itself over time. The resultant conceptualization is one in which relational processes in space unfold in and through time (McMichael 1990): Incorporated comparison “uses comparison in reconstructing an historical configuration posited as a self-forming whole.” (387)
Again, as already evidenced in the discussion of world theories and transnationalism, it seems that encompassing and incorporated comparisons constitute two approaches which have specific strengths and weaknesses for analyzing transnational phenomena. Yet both can be fruitfully used to uncover social mechanisms.

6. Outlook – The Danger of Conceptual Stretching

One of the central contentions has been that transnational approaches should not only be able to account for the emergence of transnational structures *sui generis* and new institutions but also to gauge the changes of national, international and local institutions and practices. In order to study transnational relations in all their facets of transnationalization and transnationality systematically, one needs concrete conceptual tools, such as the notions of boundary and identity. Changes in boundaries and identities are hints towards changing institutions and practices and thus social transformation. Such tools are necessary to navigate the Scylla of using terms such as diaspora affirmatively, and the Charybdis of rejecting it because it is a diffuse term. The goal then is to look at changing boundaries and identities in national, local and global institutions.

In order to analyze the impact of transnational processes for institutions and organizations from the vantage point of political sociology, world polity theory on the one hand and meso-level transnationalist perspectives on the other hand seem to be most promising. Taken together, these two sets of approaches are central elements of the field of transnational studies; perhaps to be complemented by world systems theory from an economic sociological viewpoint. Transnational studies needs to become an ecumenical field, which leaves conceptual and methodological space for both top-down/outside-inside views and the constructivist perspectives of boundary-identity making and change. This analysis exemplified this very general idea by using the case of dual citizenship, which exemplifies the changing boundaries and thus also identities of the political. In this way the social mechanisms of changing boundaries and identities could be shown on a systems level (e.g. path-dependent lock-in and disincentive effects), an institutional, group and organizational level (e.g. social closure, opportunity hoarding) and on a cognitive level (e.g. symbolic recognition).
Looking closely cases such as dual citizenship is of great importance to address the question whether national institutions can “jump track” to support new, perhaps even transnational orders. More specific questions would be, for example, whether pluri-local integration and thus the various paths of incorporation of immigrants result in a devaluation and/or revaluation of national citizenship. One may also go beyond this more traditional concern and ask whether dual citizenship is serving a transnational logic, in which the elements of citizenship as a political concept are not only disaggregated but also assembled in new ways. For example, citizenship is not only a multi-dimensional concept, which relates to democracy, rights & obligations, and collective identity, but also a multi-tiered concept. Max Weber argued in his social and economic history that citizenship was first conceived and practised at the municipal level in Ancient Greece and Medieval Europe before it moved up one level and became de jure and de facto congruous with membership of a territorial national state (Weber 1972). The disaggregation of citizenship should lead to a renewed emphasis on citizenship above and below the national state (cf. Benhabib 2007). This disaggregation is not only important for understanding genuinely new forms of membership, such as EU citizenship, but also transformed old forms. Going beyond the legal notion of citizenship to a socio-political understanding, citizenship practices designate a set of mutually enforceable rights and obligations relating categories of persons to agents of governments, and not necessarily states. As government we may define any organization that controls the means of coercion within a delimited territory. States, by contrast, are those governments that receive recognition from other governments in the same situation. Ideally, they also do not fall under the jurisdiction of any other government. Ghana and Germany qualify as states, while municipalities within their confines can be seen as governments, but not as states. Put in this way, there is also a large field for analyzing the transactions of migrants and relatively immobile persons on the municipal level, such as indigenous self-governance across Central and North America (e.g. Besserer 1999), or chieftaincy across Europe/USA-Subsahara Africa.

The general question raised by such an extension is whether we overstretch the notion of citizenship when going beyond national states. Several critics have argued that citizenship only makes sense when tied to national states (Offe 2003; Turner 2001). While one may not share the scepticism when it comes to European Union citizenship, the problem of ‘conceptual stretching’ is evident. In his review of “transnational citizenship” beyond the borders of national states Jonathan Fox (2005) concludes that only dual citizenship as discussed above lives up to fulfilling criteria such as codified rights and obligations and full
membership. Nonetheless, as I have argued in the case of concepts such as diaspora, we should not get embroiled and lost in definitional exercises but analyze closely in what ways and with which consequences agents reconstruct notions such as citizenship to transform boundaries and in doing so, constantly redefine their political and social identities, contributing to social transformation.

\[\text{Footnote: For another use of the term transnational citizenship pointing towards internal transnationalization, see Bauböck (1994).}\]
Figure 1: Restriction and Tolerance towards Dual Citizenship around the World

Note: The most restrictive cases are characterized by the following criteria:

- Assignment by birth: only one citizenship possible;
- Obligation to choose one citizenship on reaching maturity;
- Renunciation requirement (in some cases also proof required) upon naturalization in another country; and
- Forced expatriation upon naturalization in another country.

The more strictly the acquisition of a citizenship is governed by principles (1) to (4), the more restrictive the regime – and conversely, the more lenient the procedure, or the more exemptions there are from these requirements, the more tolerant the regime in question is to dual citizenship.

### Europe

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I gratefully acknowledge the research assistance by Julia Aßhorn and Christiane Meyer.
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**Asia and Oceania**

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**Source**

Faist: Towards Transnational Studies

Literature


