Towards Transnational Studies: World Theories, Transnationalisation and Changing Institutions

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A transnational studies perspective should be able to deal with both new social formations 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. There is now a voluminous literature dealing with the emergence and above all the forms of transnational activities of migrants and the attendant consequences for the social integration of immigrants. If transnational ties and formations are consequential for social change and perhaps even 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 to look at various transnational ties and formations across the borders of national states, but also at the repercussions for national and local institutions. In order to address this problem, the paper argues that both the concept of transnationalisation—including transnational social spaces—and world approaches, such as world systems and world polity theories, could be useful lenses to describe different aspects of transnational processes and boundaries. Second, transnational studies needs to engage both world theories and a transnational optic to ask about the social mechanisms by which transnational processes affect institutional change: path-dependency on a systemic or macro level, social closure, opportunity hoarding and brokerage on a collective or meso level, and symbolic recognition on a cognitive or micro level.

Keywords: Transnationalisation; World Systems; Institutional Change; Boundaries; Social Mechanisms; Dual Citizenship
Introduction

A transnational perspective should aim both to deal with the genesis and reproduction of new social formations *sui generis*, such as transnational social spaces, and to address how ‘old’ national, international and local institutions acquire ‘new’ meanings and functions in the process of cross-border transactions. By now, there is a vast literature dealing with the emergence and above all the forms of transnational activities of migrants and the resulting consequences for the social integration of immigrants (for a succinct summary, see Levitt and Jaworksy 2007). In a nutshell, most studies have focused on cross-border migrant agency, usually including significant others, such as those left behind in regions of emigration—for example, relatively immobile persons (Hammar *et al.* 1997). Many studies have tried to come up with typologies of transnational life, such as diffusion, families, associations, networks, communities and diasporas (see Bauböck and Faist 2010). Most transnational analyses have focused on migrant practices, but they have neglected the transformation of institutions in transnational spaces and how these changes interact with the transnational lifeworlds 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 in the context of globalisation. Now we need to take the next step and ask how institutions have been changing.

If transnational ties and formations are consequential for institutional transformation, we also need to find indications about changing institutions in the national, international and local realms of transnational spaces. This should be self-evident from the very definition of transnational social spaces, which can be thought of as sustained and continuous ties and their concatenations in networks, groups, organisations 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 transnationalisation as sets of sustained cross-border processes, and of transnationality as an awareness of such processes, need to go beyond building typologies and move towards explanations of how social formations in transnational spaces on the one hand and (inter-)national and regional institutions on the other, interact.

Therefore this paper pursues a twofold agenda. First, it argues that both concepts of transnationalisation—interchangeably called transnational social spaces/fields/formations—and world approaches—world polity and world system theories—could be useful lenses through which to describe different aspects of transnational processes, boundaries and identities and thus changing institutions, practices and cognitions. While these two sets of approaches indeed pursue different agendas, they give us valuable insights into transnationalisation and transnationality. Both world theories and transnational perspectives are elements of a field we could call transnational studies (Khagram and Levitt 2008).
Second, transnational studies needs to engage concepts such as social mechanisms to advance our understanding of sustained cross-border (ex-)change (Bunge 1997; Elster 1989: 3–10; Hedström and Swedberg 1998). These analyses can be carried out 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 (which are usually not necessarily mechanistic) are not law-like statements but offer context-dependent and process-oriented explanations which open the black box of variable-oriented social sciences. In this way disparate theoretical and conceptual approaches such as transnational social spaces and world theories may complement each other, without implying the need for one big, overarching theory dealing with transnational processes.

To give examples of social mechanisms to be identified when using transnational and world approaches, I use growing legal tolerance towards dual citizenship. Citizenship is a particularly useful case because it signals social closure towards outsiders and newcomers and raises questions of boundaries to be overcome for inclusion into membership. Citizenship concerns various aspects: first, equal political freedom, democracy and thus political participation; second, rights and legal status; and third, affiliation to one or several political communities. As to the first aspect, dual citizenship as full membership overlapping two or more states raises the question of who is included in democratic processes, among those resident in the territory inside or outside of a state. As to immigrants, the question is whether those who reside in a state can be excluded from political participation; as to emigrants, whether and to what extent they have a stake in the affairs of the country of origin. Regarding the second aspect, questions arise as to which rights can be legitimately claimed by those absent and present. The third aspect, at least over much of the nineteenth and twentieth centuries, was tied to heated discussions on the loyalty of citizens with ties to more than one state.

At this point a clarification of how the key term transnationalisation differs from internationalisation and globalisation is in order. These remarks also apply to the terms transnationality, internationality, and globality. Transnationalisation 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 or the UN Global Compact. A lot of emphasis is on social formations overlapping national states. This is different from internationalisation, which deals with ties, events and processes involving almost exclusively states and their agents. An example would be the (partial) international regime protecting refugees, based on the Geneva Convention (1951) and subsequent Protocols. Globalisation differs from both transnationalisation and internationalisation 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 globalisation is reflected in
more delimited developments, such as ‘EU-isation’ in Europe. World systems theory and world polity theory also share this aspect of the globalisation view. However, these two theories are different from globalisation studies in that they claim to go beyond the empiricist thrust of the latter, and offer causal explanations.

The first section of this paper outlines two types of world theories mentioned, looking at world systems theory and world polity theory as examples of macro-structural theories. My argument is that macro-structural theories emphasising 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 transnational 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 transnationalisation to institutional change on various scales. Transnational approaches need to be extended to specify the social mechanisms by which boundaries 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 of the paper uses growing legal tolerance of dual citizenship to suggest the utility of both world polity theory and a transnational approach when looking at boundaries and identities. 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 conclusion considers whether and under what circumstances ‘old’ concepts, such as citizenship, are adequate in capturing the impact of transnationalisation and transnationality and thus how ‘old’ institutions may acquire ‘new’ meanings.

The World Explained: World Systems and World Polity Approaches

Sociology as a discipline lagged behind political science in empirical globalisation 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 observations of globalisation studies. First, there is a rich mine of various theories conceptualising global exchange and communication processes. Marxist world systems theory and neo-institutionalist world polity theory are the most prominent exemplars. Moreover, there are transnational approaches. All are heavily interdisciplinary.

‘World’ approaches posit a coherent, self-sustaining entity such as an economic world system or a world polity. They 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, transnational 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.

In the following subsections, two prominent world theories—world systems and world polity theories—are outlined and contrasted with transnational approaches. The main argument is that world theories are helpful in conceiving social structures beyond the national state as part of larger processes. However, if we want to understand 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-making (Wimmer 2007), the cross-border processes of ‘drawing boundaries’.

**World Systems Theory: Power Asymmetries in the Capitalist World Economy**

Building upon dependency theory (e.g. Amin 1973; Cardoso and Faletto 1979), world systems theory seeks to delineate the genesis and reproduction of the modern capitalist world economy in successive periods from a macro-perspective. The world system can be conceived as a set of mechanisms which redistributes resources from the periphery to the core. In this view, the core is the economically developed and democratic world, and the periphery is the underdeveloped part of the world. There is a fundamental and institutionally stabilised ‘division of labour’ between core and periphery: while the core has a high level of technological development and manufactures complex products, the role of the periphery is to supply raw materials, agricultural products and cheap migrant labour for the expanding agents of the core. The economic exchange between core and periphery takes place on unequal terms, based on a fundamental power asymmetry: the periphery is forced to sell its products at low prices, but has to buy the core’s products at comparatively high prices (Wallerstein 1983). The statuses of core and periphery are not, however, mutually exclusive and fixed to certain geographic areas; instead, they are relative to each other and shifting. There is also a zone called ‘semi-periphery’, which acts as a periphery to the core, and a core to the periphery. At the end of the twentieth century, this zone would include, *inter alia*, Eastern Europe, China and Mexico. A crucial insight to be derived from world systems theory for the analysis of transnational processes is that transnational flows in the context of migration strongly coincide with the economic and derivative political power asymmetries of the world economy. Dense and continuous transnational flows build upon migration systems (Kritz *et al.* 1992) which in turn are structured by core–periphery relations. Yet such asymmetries are not sufficient to account for transnational formations.
World Polity Theory: Rational Organisations

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 rationalisation 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 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 prioritises the rational orientation of organisations.

Problems with the World Optic

There are various problems with world systems and world polity theory. First, while there are examples for the fruitful use of world systems theory for transnationalisation (e.g. Basch et al. 1994; cf. Smith and Guarnizo 1998), its economistic bias reduces its potential for the analysis of political (see e.g. Zolberg 1983) or cultural processes. For example, it is quite evident that national states are the main regulators of international migration flows, and also structure transnational ties through policies determining external voting rights or dual citizenship. Moreover, world systems theory cannot pay enough attention to how the exact ties between core and periphery are negotiated on the level below macro-economic relations.

Second, world polity theory postulates a priori and without further systematic empirical consideration that a world polity actually exists. 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-organisations 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 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 2009a). 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, we observe that they do not rule universally, although most states have adapted their discourses to these meta-norms.
Third, the two world theories offer 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. World polity theory maintains that cognitive models shape the actors although it is plausible that it is not only the world polity that 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 conceptualising development (for a critical assessment, see Glick Schiller and Faist 2009). Different agents hold divergent notions of development. The notions of the World Bank, changing over time, are different from those of grassroots organisations. In essence, it is not clear why some patterns are more or less universal while others are not. We can list 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 recently started to think about such models. Examples of the former category are France, the UK, Spain and the Netherlands; for the latter, Germany, Austria and Sweden.

Fourth, the world polity approach predicts that actors reap benefits from adapting to cognitive models such as the mainstreaming of tertiary education frameworks, 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 (Finnemore 1996). For example, political agents active in pushing for gender equity criticise 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 polity theory offers concepts such as the diffusion of organisational models and norms (e.g. human rights) which can be empirically operationalised. World systems theory is useful in outlining the asymmetric power relationships between emigration and immigration regions.
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 possibly the emergence of ‘new’ ones. Before doing so, a contending conceptual approach needs to be discussed: the transnational optic.

The Transnational Perspective

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. Yet, in the same breadth, it draws attention to the implication that what it aims to overcome from a methodological perspective—the ‘nation(al)—is in productive tension with the global (cf. Ong 1999). To assert that transnational scholars have proclaimed the withering away or the decreasing significance of the national state (Waldinger and Fitzgerald 2004) is simply incorrect. Obviously, these authors confuse transnationalisation with post-nationalism. And even concepts such as post-national membership (e.g. Soysal 1994) depend on the continued vitality of nation-states as sites of contention and enforcement of rights. Equally important, world polity theory is not concerned with the demise of the nation-state model but with its universal spread. At any rate, the transnational perspective is able to look both at new social formations sui generis, such as transnational social spaces (e.g. Faist 2000), 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 analysis, it has more affinity with world polity theory.

Transnational views thus argue against a simplistic top-down world polity version of global or ‘glocal’ conditions, which suffers from an exogenous rational-actor model. Transnational approaches certainly do not form a coherent theory or set of theories. They can be more adequately described as a perspective, 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 organised crime (Shelley 1995) and ‘new wars’ (Kaldor 1999), transnational religions and communities (Levitt 2007), transnational financial flows (Held et al. 1999), transnational (viz. global) commodity chains (Gereffi 1994), transnational non-governmental organisations (Boli and Thomas 1997) and transnational social movements and counter-hegemonic globalisation (Evans 2000), transnational networks and advocacy groups (Keck and Sikkink 1998), transnational feminist praxis (Naples 2002), transgovernmental relations (Slaughter 1997), and transnational (cultural) diffusion (Appadurai 1996). Closer to migration, there is also a variety of often fuzzy terms, which nonetheless share a focus on migrant agency: transnational social spaces (Faist 2000), transnational social fields (Basch et al. 1994), transnational social formations (Smith and Guarnizo 1998), and transnational communities (Portes et al. 1999); the last term is sometimes used interchangeably with diaspora(s).
The Oxford Dictionary of English dates the emergence of the term ‘transnational’ to around 1920, documented with a quotation from an economic text that saw Europe after World War One characterised by its ‘international or more correctly transnational economy’ (Soanes 2003: 1762). The term only re-emerged in the late 1960s to denote increasing economic and political interdependence between industrialised countries (Keohane and Nye 1977; for an updated extension, 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. 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 transnational 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 individual 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 polity or 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: 605). 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 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). Neo-functionalist 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, for example, 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 the 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, Tokyo 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. This insight also applies to the life-worlds of migrants, new telecommunications that are 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 Transnational Perspective

Innovative social anthropologists around Nina Glick Schiller placed migrants and their ties and collectives firmly at the centre of an agency-oriented approach (Basch et al. 1994). Yet Glick Schiller’s equally important macro-structural positioning of transnationalisation in world systems theory very soon got lost when picked up by subsequent analysts. One important strand of this thinking has become the social-relational approach, linking up with migration and migrant network analysis (see
Portes et al. (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 associated identities of the agents involved. Moreover, it has not engaged in activities presenting the mechanisms of how ties, networks and organisations change the institutions involved.

A Modest Proposal: Focus on Changing Boundaries and their Transformation

It is therefore helpful to think about how boundaries change and by which mechanisms such transformations occur (Tilly 2005). Social boundaries interrupt, divide, circumscribe, or segregate distributions of persons and groups within social spaces which cross the borders of national states. Shifting boundaries are indications of the changing of institutions, practices and cognitions. The dynamics of changing boundaries can be nicely captured in the debate on the ‘newness’ of transnational social spaces. Some transnational scholars early on claimed the newness of such phenomena. It did not take long until historically minded social scientists showed convincingly that not only have return migration and occasional visits to home regions existed for quite some time (Foner 2001), but also that ‘transnational communities’, with dense internal ties both within states of immigration and towards regions of emigration, have likewise existed for a long time. Max Weber, for example, spoke of the ‘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 these technological changes would not have translated into social change if it had not been for the right towards collective self-determination, and boundary shifts in thinking and acting upon cultural diversity 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—are claims against all the empirical evidence (Faist 2009b). 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’.

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 of the nineteenth to the twentieth century when compared to a hundred years later, despite widespread xenophobia in the contemporary period. Only in this semantic field
could technological opportunities make for increased ‘community without propinquity’. We now need to see what can be explained by various theoretical approaches dealing with transnational phenomena. This task necessitates an analysis on macro, meso and micro levels. Most importantly, we have to identify the social mechanisms operative in changing boundaries, such as path dependency, social closure, opportunity hoarding and symbolic recognition.

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 citizens would not integrate in the host country and would keep exclusive loyalty to the country of original citizenship. And in times of war in the nineteenth and early twentieth centuries 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 naturalised 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 insurmountable problem for integration, legitimation, foreign policy and diplomatic protection, but instead as a challenge that needs to be negotiated from standpoints ranging from (mostly) 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 have been steadily growing.

The question is not simply what causes dual citizenship to change towards a higher degree of tolerance over recent decades. Instead, it is more a case of how political boundaries form and change, in this instance becoming more permeable. The world polity perspective is useful to outline the broad contours of how dual citizenship changes as a result of the path-dependent diffusion of human and gender rights through international law. Yet this analysis would remain incomplete if it did 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 transnationalisation is concerned with the social integration of migrants. Oddly enough, much less attention is paid to whether and how the
Figure 1. Restriction and tolerance towards dual citizenship around the world

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

1. **assignment by birth**: only one citizenship possible (Afghanistan, Iran, North Korea, Vietnam);
2. **obligation to choose** one citizenship on reaching maturity (Finland, Germany, Chile, Dominican Republic, Venezuela, Angola, Botswana, Kenya, Namibia, Tanzania, Brunei, Fiji, Japan, Papua New Guinea, Philippines, Singapore, Solomon Islands, Thailand);
3. **renunciation requirement** (in some cases proof also required) upon naturalisation in another country (Andorra, Czech Republic, Denmark, Finland, Germany, Netherlands, Norway, Poland, Brazil—though tolerant, Columbia—though tolerant, Chile, Cuba, Dominican Republic, Ecuador—except for Spanish citizens, Venezuela, Botswana, Burundi, Cameroon, Congo, Djibouti, Kenya, Namibia, Tanzania, Afghanistan, Armenia, Brunei, China, Fiji, India, Indonesia, Japan, Kiribati, Malaysia, Nepal, Papua New Guinea, Philippines, Singapore, Solomon Islands, Thailand, Vietnam); and
4. **forced expatriation** upon naturalisation in another country (Austria, Belgium, Denmark, Finland, Germany, Netherlands, Norway, Argentina—except for Spanish citizens, Chile, Dominican Republic, Ecuador—except for Spanish citizens, Venezuela, Algeria, Angola, Botswana, Burundi, Cameroon, Congo, Djibouti, Kenya, Namibia, Tanzania, Afghanistan, Armenia, Brunei, Fiji, India, Indonesia, Japan, Malaysia, Nepal, Papua New Guinea, Philippines, Singapore, Solomon Islands, Thailand).

The more strictly the acquisition of a citizenship is governed by principles (1) to (4), the more restrictive the regime; 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.

organisations or institutions of ‘mainstream’ or ‘majority’ categories of society adapt and change in the face of pluralising society (Faist 2009b). 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 induced by international migration and, above all, changes in family and gender law. In general, the changes are slow and sometimes path-dependent developments in international law which have filtered down, and are resisted or embraced by national states.

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. On the national level lobby groups have worked hard to implement international conventions. In Germany, for example, the ‘Association of Women Married to Foreign Men’ (Verein der mit den ausländischen Männern verheirateten Frauen) engaged in effective pressure politics in the 1970s and 1980s. Ultimately, the two main consequences of the conventions, pressure-group politics from below and national laws, 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 naturalisation. 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 out the renunciation clause when citizens of other member-states naturalise. Emigration countries have followed the lead of immigration countries, and have increasingly used dual citizenship as a means to relate to their diaspora.

World polity theory analysis cannot account for the fact, however, that the increased toleration of dual citizenship has been a bumpy road. Although there has been a seminal trend of liberalisation in this case, many countries still do not recognise dual citizenship as a rule. Moreover, some countries have experienced 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 agentic mechanisms driving conflicts around membership.

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 which 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 transnational 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 (re)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 organisations.

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, naturalising without renunciation. One prominent argument to rationalise this kind of liberalisation by way of dual citizenship has been to promote the 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 centre of these considerations. Countries with significant shares of emigrants, that is, emigration countries, have subsequently also adapted their citizenship laws, verging towards more tolerance of dual citizenship among their citizens abroad. The case of dual citizens in diasporas is an interesting case. Migration usually only implies geographical exit and not a permanent loss of membership in formations such as kinship systems or states.
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 signalling underdevelopment to a solution of the so-called development question. The second mechanism is emulation. It consists of taking over patterns and routines practised by other governments of emigration states. Nonetheless, one needs to be careful in jumping to conclusions and falsely imputing emulation. For example, in their study of five emigration countries (India, Philippines, Mexico, Turkey and Morocco), Castles and Delgado Wise (2008) found that they had all changed their rules on dual citizenship and overseas voting about the same time. Yet they found no evidence of contact between the governments, or even knowledge of each other’s action.

Micro Level: Symbolic Recognition

The cognitive mechanism of symbolic recognition is a prime example of a changing boundary. 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 deciding which citizenship they would keep if they had to give up one of them. The acceptance of dual citizenship may recognise 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, better, 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 have been dual citizens since birth—children of binational 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).

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 transnationalised by way of increasing toleration. 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 liberalisation would not be irreversible in times of war and intense conflict. 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—interface with and co-constitute each other. One particularly interesting phenomenon is tension 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, 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 naturalised had to give up their former citizenship before acquiring German citizenship (not regarding exceptions which amount to about 40 per cent of those who naturalise!), 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 liberalisation 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 liberalised at the very same time.

**Outlook: The Danger of Conceptual Stretching**

One of the central contentions has been that transnational approaches should be able not only 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 transnationalisation and transnationality systematically, one needs conceptual
tools, such as the notion of boundary. Changes in boundaries between groups and in
organisations are hints towards changing institutions and practices. The goal then is
to look at changing boundaries in national, local and global institutions.

In order to grasp the architecture of transnational politics, which—as suggested by
the examples discussed in this article—involves more agents and institutions than
national states, we will need sophisticated models to understand *de facto* multi-level
and transnational governance. Usually, multi-level governance is used in obvious
cases such as EU governance. However, there are many issues discussed in
transnational studies, such as migration or ecology, which can only be captured by
an expanded notion of governance. Regarding dual citizenship, for example, not only
international and national courts and the executives of national states but also local,
national and transnational migrant associations have been key players. To give
another example, development cooperation relates to interlocking webs of interna-
tional and national development organisations, international organisations, national
states with ministries and migrant associations.

In order to analyse the impact of transnational processes for institutions and
organisations from the vantage point of political sociology, world polity theory on
the one hand, and meso-level transnational perspectives on the other, seem to be
most promising. Taken together, these two sets of approaches are central elements of
the field of transnational studies; 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-making
and change. My analysis in this paper has illustrated this very general idea by using
the case of dual citizenship, which exemplifies the changing boundaries and thus also
identities of the political.

Cases such as dual citizenship are of great importance in addressing the question of
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
results 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 and 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 1981: 315–37). The disaggregation of citizenship should lead to a
renewed emphasis on citizenship above and below the national state (cf. Benhabib
2007). This process is not only important for understanding genuinely new forms of
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**Note**: ** only in certain cases, *** except for Spanish citizens. The most restrictive cases are characterised by the following criteria:
(1) assignment by *birth*: only one citizenship possible; (2) obligation to *choose* one citizenship on reaching maturity; (3) *renunciation requirement* (in some cases proof also required) upon naturalisation in another country; and (4) *forced expatriation* upon naturalisation in another country.

The more strictly the acquisition of a citizenship is governed by principles (1) to (4), the more restrictive the regime; 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.

membership, such as EU citizenship, but also old forms transformed. Moreover, there
is also a large scope for analysing 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 and Sub-
Saharan Africa (Sievenging et al. 2008).

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 (e.g. 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, we should
not get embroiled in definitional exercises but analyse closely in what ways and with
which consequences agents reconstruct notions such as citizenship to transform
boundaries and, in doing so, contribute to institutional change and perhaps even
social transformation.

Acknowledgements

I would like to thank Stephen Castles for constructive comments on an earlier version
of this paper. I also gratefully acknowledge the research assistance of Julia Aßhorn and
Christiane Meyer in the construction of the map in Figure 1.

Notes

[1] Here I use the term transnationalisation to connote cross-border processes. I do not refer to
the term transnationalism, as ‘-ism’ always suggests an ideology.


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