Constituents at the Gate: Social Democratic Parties and the Extension of Citizenship and Naturalization Rights

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Abstract

Studies of citizenship acquisition and naturalization policy have begun to focus on the institutional factors affecting policy outcomes, with the strength of populist radical right movements being seen as an important factor. Building off Marc Morjé Howard’s (2009) study of citizenship policy, this paper suggests the strategies of mainstream left parties—who are torn between an immigrant electorate and a working-class electorate opposed to immigrant policies—as a potentially even stronger determinant of citizenship policy. Liberalized citizenship policies have only been possible when social democratic parties have strongly supported them. Case histories of Germany, the Netherlands, and Denmark are examined to further explore these dynamics.

Introduction

Marc Morjé Howard’s critical work (2009) on the nature of state’s naturalization and citizenship acquisition policies has consolidated and brought a new degree of focus to a rich—but often contradictory—literature on the origin and trajectory of such policies. By looking at the institutional constraints on such policy, Howard has been able to isolate a number of factors that have constrained the development of these policies and have sustained a large

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since this paper refers exclusively to “citizenship” in terms of citizenship acquisition, rather than any normative concepts thereof, these terms will be used interchangeably in the rest of this piece.
degree of variation between countries, despite a general trend toward liberalization across Europe. However, in accurately pointing to immigration’s salience as an important factor in general, and the strength of the radical right in particular, his work misses the important role played by parties of the left. These parties, through frequently supportive of expansionary policies, do not always take a strong stance in favor of liberalizing naturalization and citizenship acquisition. Ignoring this variance tends to obscure the fact that the paths of the radical right and of the left are dynamic. By doing so, it attributes to the radical right a degree of agency in their own success that they may not truly possess. In this respect, this paper shares in a concern expressed by, among others, Koopmans et al. (2005); namely, that a strict focus on institutions can fail to capture the dynamic nature of many political institutions (p. 19). Parties of the left must be seen in this way: as institutions, but also as actors with specific—and changing—strategies and goals to be pursued in the given institutional environment. Indeed, as this paper will attempt to show, it has been those cases when left parties have specifically chosen to fight for expansive policies that such have been adopted. When they have decided that is not in their best interest to push for such measures, conversely, policies have generally become more restrictive. This process is tied to the development of issue salience and radical right growth, but it is not identical. If, as it appears, the radical right will remain an active force in many European countries in the years to come, further variations in policy development will likely be explained more by what the left does (and does not do) than by what the radical right does. The strategies that the left will undertake in this domain are made particularly interesting by the fact that immigrant-origin electorates have been a strong—and in most cases, a growing—source of potential support for social democratic parties. Any account of the expansion (or contraction) of access to citizenship, if it takes into account the effect of the radical right, will also need to take into account the strategies that the mainstream left has adopted and pursued in its efforts to bridge its immigrant and non-immigrant constituencies.

A number of attempts to explain citizenship policy from a political science perspective have been put forth. Some of these focus on individual-level behavior and outcomes to understand when and how immigrants themselves come to identify with—or remain excluded from—the political processes of their home countries. Another common approach has been in the tradition of political opportunity structures, looking at the formal and informal institutional contexts into which immigrants have had to incorporate, arguing that these contextual factors place important limits on the manner and degree to which immigrants find
themselves able to incorporate, whatever their individual interests or prior characteristics. Howard’s book is a particularly important step that has served to integrate diverse strands of the literature, recognizing that party-level actors (in the form of radical right parties), historical contexts, and issue salience can all play an interactive role in bringing about policy outcomes. This paper is an initial attempt to build upon this framework by introducing one further set of important party-level actors overlooked by Howard (i.e., parties of the mainstream left), showing the degree to which variation in their issue positions has affected citizenship policy as an outcome, and suggesting some potential sources of variation in these parties’ issue positions which can form the basis of further research.

Background

Citizenship Policy

Within the migration and incorporation literature, there are a number of good reasons to think that citizenship is an interesting outcome to explore in its own right. Citizenship brings with it the right to participate fully and equally in the political sphere, and while there are increasing numbers of countries that extend local voting rights to non-citizen residents—not to mention a number of non-voting forms of political action—citizenship remains a precondition for voting in national elections. Furthermore, the acquisition of citizenship has been linked to a number of positive outcomes, including better access to job markets (Bratsberg, Ragan and Nasir, 2002) and to increased social acculturation (Ersanilli and Koopmans, 2010), in addition to its necessity to access elements of the social welfare state in many circumstances.

A number of different causes have been put forth to explain the variations in citizenship that existed prior to the age of post-war migration. One strain of the literature (summarized most notably by Brubaker (1992)) looked to the historical development of these policies to establish “types” of regime. In Brubaker’s work, the important contrast is between a French “assimilationist” and a German “ethno-national” model. While Brubaker takes great pains to emphasize that this is a historical and institutional story, and by no means an entirely cultural story (p. 16), it does imply a certain stickiness to citizenship policy. Howard proposes an alternate typology, pointing to former colonial powers and early democratizers as countries who were likely to enter the second half of the 20th century with more open
citizenship policies (p. 37). These policies, however, began to change and move toward somewhat more liberalized policies in the last few decades (Howard, 2009; Jopple, 2010, inter alia) This is a move which corresponds to a generally liberalizing trend in admissions policies over the same time period.²

<table>
<thead>
<tr>
<th>Country</th>
<th>CPI 1980s</th>
<th>CPI 2008</th>
<th>Δ CPI</th>
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</table>

Table 1: Citizenship Policy Index: EU-15

Table 1 illustrates the general trends toward (and notable exceptions to) liberalized citizenship. The “CPI Score” reported is an ordinal scale constructed by Howard, and measures the overall liberalization of policy on a scale from 0 to 6, combining scores assigned on three policy areas: the extent to which ius soli is practiced, the length of residency required for naturalization, and the degree to which dual citizenship is permitted. While the scale does not allow for precise quantitative comparisons, it can be seen that there has been a liberalizing trend in 11 of the 15 EU countries he compares, and there are more large, liberalizing steps than there are retrenchments of a similar magnitude. However, if we look at the four countries that have instead made their policies more restrictive, we see few obvious points of comparison among them. Populist radical right parties have been powerful in Austria and Denmark, to the point of serving in government or at least supporting minority governments. In Greece, however, anti-immigrant sentiment is more diffuse, with perhaps more generally negative attitudes but a much more marginal radical-right sector. In the UK, the radical right is almost non-existent. Furthermore, three of these countries clamped down further on historically restrictive policies during this time period, while the UK implemented more marginal, social integration-focused policies toward asylum seekers yet still retained most of its historically liberal policies. Either migration and integration

²See Meyers (2000); Freeman (2006) for useful reviews of the admissions literature.
(in Austria and Denmark) or asylum (in the U.K. and Greece) served as salient issues in all of these countries over the time period in question, indicating that more public debates over immigration may be a common thread. But we can also see countries in this table where immigration remained a highly salient issue and yet policies continued on an expansionary path (e.g., France). All of the explanations offered thus far may well have an effect on policy outcomes, but they still seem inadequate either to explain the variation in citizenship policy over the time period in Howard’s study or to explain the general push toward liberalization.

Electoral Strategies and Parties of the Left

Parties of the left experience two competing pressures on citizenship policy, and indeed on all immigration-related policy, that must be taken into account. First, they are the party most likely to gain votes as immigrant-origin residents gain the right to vote and become mobilized. Secondly, they have a core, working-class constituency which is most likely to be opposed to increased immigration and most likely to join populist radical right movements as they emerge.

In American politics and sociology, a large literature has shown the efforts taken by political parties to recruit immigrant voters (e.g., Gamm, 1986; Erie, 1988 for earlier periods; DeSipio, 1996; Ramakrishnan, 2005 for contemporary processes). The European historical experience has been drastically different, however. European countries were largely immigrant-sending nations rather than immigrant-receiving nations when suffrage was expanded around the turn of the last century, which is also the time when American immigrants were being won over to politics and to the political parties. While a non-trivial amount of migration to and within Europe did take place at this time (not to mention the large numbers of displacements following World War II), the continent arrived in the present day without a long historical view of themselves as “nations of immigration” (Brubaker, 1992; Lucassen, 2005)). The concept of immigrants as a new electorate is not wholly new in Europe, but the idea does not figure as prominently as in the United States, either in academic writing or in the popular political press (Schain, 2008).

What we know from descriptive studies is that individuals with an immigration background remain considerably more likely to vote for parties of the left than the general populace. In the U.K., Labour has consistently received greater than $2/3$ of the vote of visible minorities over the last few decades (Messina, 2007, p. 203). In Germany, Turkish-
origin voters support the Social Democrats (Sozialdemokratische Partei Deutschlands, SPD) at levels over 60 percent, and the Greens pick up another 20 percent or so of these voters (Bird, Saalfeld and Wüst, 2011, p.91) In the Netherlands, while there is some variation across immigrants of different national origin, the Dutch Labour Party (PvdA) has been the predominant choice of immigrant voters since at least the early 1980s. In the 2011 regional elections, PvdA support ranged from a low of 27 percent among Surinamese voters to a high of 68 percent among voters with a Moroccan background, as against 17 percent support from the overall electorate. When the other parties of the left and center-left are included (The GreenLeft, the Socialist Party, and the D66), vote share ranges from 62 percent among Surinamese to 94 percent among Moroccans, although these parties together received only slightly more than 40 percent of the overall vote. Furthermore, the only group which showed noticeably diminishing support for the PvdA in some previous elections—voters of Turkish origin—appears to have returned to the party in the last few years and 57 percent of Turkish voters backed the party in the latest provincial elections (Michon, Tillie and van Heelsum, 2007; FORUM, 2011).3 When it comes to representation, levels of descriptive representation in national parliaments is generally lagging behind representation rates in the population at large,4 but the number of immigrant-origin councilors is quickly catching up to the number that would be expected given their population in the larger populace; this is particularly the case in a number of Scandinavian countries where local electoral rules, especially the presence preferential voting, are favorable to the advancement of minorities (Bergh and Bjorklund, 2011; Dahlstedt, 2008; Togeby, 2008). It should thus be expected that, given current alignments, any increase in the number of immigrants voting has particularly large ramifications for the parties of the left. Traditional economic models of voting explain a part of this, as immigrant-background voters are more likely than the general population to identify as “working class” and to occupy low- and semi-skilled job positions traditionally aligned with the left. Other likely explanations posited in the literature are group-specific benefits and enduring partisan identification from when immigrants first arrived in the guest-worker period and were engaged primarily by labor unions and/or immigrant labor associations.5

However, parties of the left have also traditionally earned a large section of their support

3 See Bird, Saalfeld and Wüst (2011) for a much more detailed, comparative summary of this empirical literature.

4 The Netherlands being the most notable current exception to this rule.

5 Bird, Saalfeld and Wüst (2011, chap. 3) have published an extensive summary of the quantitative studies in this area to date.
from the native-born working class, who are the most likely to see themselves in competition with immigrants for both market and government resources. A number have studies have shown that a sizable portion of the growth in populist radical right movements in Europe has come from former supporters of parties of the left rather than from Conservative, Christian Democratic or other parties of the right (Betz, 1994; Kitschelt, 1995; Givens, 2005). As predicted by Kitschelt and others at the inception of this literature, these former sources of support on the left have increasingly tended to be not only among the working class, but also young and male, the so-called “losers of globalization.” There is some debate about the effect of this on the structure of the overall party system. Kriesi et al. (2006, 2008) have found, through content analysis and media coverage, that parties have started to reflect this new, non-economic cleavage structured especially by voters who remain on the economic left but on the right of cultural issues, particularly on immigration and related issues. However, while Brug and Spanje (2009) confirm this shift to multi-dimensional preferences among individual voters, they find European parties to remain largely uni-dimensional—left or right—in their orientation. Given this, it is not surprising that the mainstream parties of the left are able at times to retain their traditional voters by appeals to economic issues while simultaneously having to fear losing them on other issues. The importance of radical right parties to structure the debate in any given country certainly affects the nature of the tradeoff. The larger and more credible the presence of a radical right party in a country, the threat that traditional social democratic votes will be lost may itself be more credible. As Howard also rightly points out, the overall salience of the immigration issue seems to affect the ability of parties to advocate for liberal policies, and a stronger radical right movement promoting immigration as an issue may thus use the publicity of the immigration issue to constrain the mainstream parties’ positions.

Despite this, however, it may be possible to overstate the role of the radical right and underestimate the importance of the decisions made by the mainstream left. Most of the radical right literature to date has taken the politics of the immigration issue seriously, but has largely ignored immigrants themselves as potential voters. Existing studies have tended to either focus on a spatial model which has opened up a new voting dimension (e.g., Inglehart, 1990; Kitschelt, 1994, 1995; Kriesi et al., 2006, 2008; Norris, 2005) or has focused on the socioeconomic causes of support for the “populist radical right” (e.g., Betz, 1994;
Golder, 2003; Mudde, 2007). A third, more recent literature has finally begun to emphasize the importance of institutional opportunities and mainstream party strategies for these new populist radical right movements to appear (Brug, Fennema and Tillie, 2005; Meguid, 2005, 2008), but here, too, the emphasis has been on immigration as an issue rather than on immigrants as potential voters affecting party strategies. With the exception of Meguid’s work, there has also been too little attention paid to the endogeneity of radical right success and mainstream party strategies, a problem which will affect any interpretation of why and how radical right parties have gained any success. Thus, even if the underlying models that the authors mentioned above have suggested are correct, until we can include the effect that immigrant voters have on party incentives and the distribution of voters, the current approaches will very likely lead us to overstate the role of the populist radical right. This paper will begin to explore some of the interrelatedness between policy successes attributed to the radical right and social democratic strategies, but certainly much more research will be needed to fully understand this process.

One further problem remains among studies of the radical right’s effect on citizenship policies: in the vast majority of countries where there has been a successful radical right movement in the past 10-15 years, there has also been a long period of mainstream right governments. While it may be true that citizenship policies have become more restrictive where the radical right has been successful, they have occurred under the watch of Christian Democrat-led governments (as in Austria and the Netherlands) and/or Liberal-led governments (as in Denmark). When (and if) left-wing governments cycle through power in the coming years, it remains to be seen whether these dynamics will continue or whether parties of the left may use the opportunity to continue a push toward more expansionary citizenship policy.

We can thus see that parties on the left are faced with the tradeoff of being the most likely to gain immigrants’ vote, but also being the most likely to lose constituents if they are perceived to be too weak on issues of immigration and, more broadly, “globalization.” In particular, in countries where the potential gains among immigrant-background voters are seen as large enough, parties may yet be willing to accept the loss of core constituents. What we are not likely to see, however, is expansive policies being proposed or enacted when the mainstream left, and particularly the social democratic parties, have not chosen to support them.
Hypotheses

If the above analysis is correct, we should expect to see both cross-national and cross-time variation in mainstream left parties’ support for expanding citizenship and naturalization policies. Where the left takes a strong policy position in favor of these, they are more likely to be enacted; where they do not, citizenship policy will not be liberalized and may even be restricted. Support from the mainstream left should be seen as a necessary, but not inherently sufficient, condition for liberalization of policies, as the ability of these parties to pass such legislation will be contingent on the institutional and electoral factors that affect the outcome of any policy. But the absence of strong left-wing support for liberalization should be sufficient for such policies to fail.

- **H1**: When left-wing parties support the expansion of citizenship acquisition policies, such policies are more likely to be liberalized
- **H2**: When left-wing parties do not strongly support the expansion of citizenship acquisition policies, such policies will not be liberalized

We should also start to see some patterns in left parties’ support for expansive citizenship policies. On the one hand, we should expect to see Howard’s theories in regard to radical right parties borne out. Where no radical right party develops, parties on the left will face less of a tradeoff and may be able to court immigrant voters without really fearing the loss of their base. In these situations, social democratic parties and the rest of the mainstream left should still push for expansionary citizenship policies to expand their pool of potential voters. When radical right parties start to become more successful and there are more credible “exit options” for disenchanted voters, the mainstream left will be less assertive in pushing for expansionary policies. However, it is possible to think of two possible scenarios where the influence of the radical right would have a diminished effect on the mainstream left’s choices.

First, where the radical right has been particularly successful, the working-class core of the parties may have already abandoned the left, and there may be little to gain from trying to stem the flow of disenchanted voters. Secondly, there may be areas where the local-level demographics have shifted to the point where working-class immigrants outnumber working-class natives, such that, at a local level, the tradeoff is tipped significantly in the balance of the potential immigrant constituency.

- **H3a**: Where radical right parties have not developed, parties of the left will push for more expansive citizenship policies
- **H3b**: Where radical right parties have experienced a moderate degree of success, parties
H3c: Where radical right parties have experienced a high and sustained degree of success, parties of the left will begin to push for more expansive citizenship policies

And, while much further research at the local level will be required to establish this linkage, let us propose another proto-hypothesis related to the above points, and which might underlie some of the dynamics that we see:

P-H4: In areas where immigrant voters are heavily concentrated, parties of the left will push for more expansive citizenship policies regardless of the presence of the radical right. If this happens at the local level before the national level, there may be internal party conflict over this issue.

Let us now examine three countries where there has been some retrenchment in naturalization policies; in two of them, this comes after a period of significant expansion. Comparisons can be difficult because of the number of potential variations across countries, but this paper hopes to use this initial comparison to explore some of the underlying dynamics of this process. By showing that variation in left-wing parties’ support of these policies has occurred, and that these variations correspond to the expansion or retrenchment of policies, it is hoped that the importance of mainstream left positions in these debates can be emphasized. It is also intended that the stage be set for further research into the sources of these variation, following the hypotheses outlined above. Germany saw a Social Democratic Party that took advantage of several opportunities to expand policies but had to back down slightly in the last decade, despite a lack of radical right populism. In the Netherlands the trend has been toward greater liberalization, although there was some retrenchment in the last decade during the period in which radical right parties were particularly active (and, in fact, slightly preceding their growth). Finally, in Denmark, the general dynamic has been towards greater restriction, with some attempts by the left to halt this movement.

Cases

Germany

Germany was historically one of the most restrictive countries in Western Europe with regard to citizenship acquisition. The principle of *ius sanguinis* was only formally instituted and applied to the entire German state in 1913. However, it had existed in many of the German states prior to unification, and an ethnic vision of the German nation already had a long
history by that point. After World War II, citizenship policies lost much of their expressly racialized nature, but *ius sanguinus* remained the primary determinant of who would receive German citizenship. Naturalization was possible prior to the 1993 and 2000 reforms, it was difficult and expensive for individuals to meet the requirements; the fact that the process was still largely decentralized to the *Länder* and that there were no formal rules, merely guidelines, made naturalizing that much more difficult in many cases (Hansen and Koehler, 2005, p. 635). While Germany’s policy toward the naturalization of foreigners was restrictive, it retained an expansive policy toward ethnic Germans living abroad. Furthermore, as long as the German state was divided, the application of *ius sanguinus* offered Germany a way to support the German refugees who had been displaced by World War II, in addition to allowing West Germany to make a moral claim on representing the entire German nation (Hailbronner, 2010; Mushaben, 2008). Thus, while events would shortly come to contradict his assessment, it was with the support of considerable historical evidence that Rogers Brubaker could state in 1992 that, in Germany, “there is no chance that the French system of *jus soli* will be adopted; the automatic transformation of immigrants into citizens remains unthinkable in Germany.” (1992, p. 185)

When naturalization was first expanded in the early 1990s, it was done as part of a compromise between left and right. As the number of ethnic Germans claiming citizenship, as well as the number of asylum seekers from the former Soviet States and the former Yugoslavia, increased dramatically following the end of the Cold War, the German government found itself no longer able to sustain its current admissions and citizenship policies. The governing Christian Democrats (*Christlich Demokratische Union*, CDU) were able to negotiate a deal with the SPD which would curtail the number of asylum-seekers admitted by restricting access to those coming through “safe” third countries, and which would also gradually phase out the rights of the *Aussiedler* to automatically claim German citizenship. However, in exchange, the Social Democrats insisted on an easing of naturalization procedures, in addition to granting certain classes of children citizenship via *jus soli*—though it was certainly not to be applied universally (Howard, 2009, p. 126; Hansen and Koehler, 2005, p. 637). What allowed the parties to reach such an agreement? Certainly there were normative pressures on the German government to increase its access to citizenship, and Germany had found its policy criticized both domestically and internationally. Yet, normative pressures toward expansive citizenship policies are not limited to Germany and cannot also explain European states which did not liberalize their policies at the same time, unless
particularly German norms can be posited. Another problem with the normative argument is the restrictions that were placed simultaneously on asylum seekers, going against the direction of prevalent human rights norms. Electoral factors seem to be the best explanation: the SPD had the incentive to push for increased naturalization, which would likely expand its constituent base. It could do this because it was not clear at the time that its core constituency was in danger of abandoning it over the issue. The CDU—which, based upon the voting and ideological preferences of the majority of arriving Aussiedler, stood to gain votes as these new groups of ethnic Germans arrived—meanwhile faced pressure on its right to limit asylum and refugee inflows (Howard, 2009, p.127).

The fact that the further extension of citizenship was a key priority of the new SPD-Green government that took office in 1998 also indicates that the policy was advanced due to affirmative support from the left. In policy terms, this led to the introduction of ius soli under the option model, making the larger portion of German-born children of immigrants eligible for naturalization, although still requiring a period of residence on the part of the parents, as well as the explicit opting into citizenship upon majority. While not encouraging dual citizenship actively, it expanded the number of circumstances in which dual nationality would be permitted. On the political side, the SPD-Green government met with stronger opposition than expected from the CDU, who initiated a petition campaign focused particularly on the question of dual citizenship; in the months of January and February 1999, the CDU was able to collect more than five million signatures protesting the new strategy (Hansen and Koehler, 2005, p.641). Where immigration had presented political pressure before this, it was on the higher-salience issues of asylum and admissions, which had not posed an electoral threat to the left; the SPD thus could feel freer to pursue policies to attract its potential immigrant constituency. Once citizenship acquisition became a politicized issue, however, the Social Democrats had to be more concerned about the potential losses in its working-class constituency. Because of this, the SPD sought to depoliticize the issue and finished negotiations out of the public eye, backing down somewhat on the position of dual nationality (Howard, 2009, p. 137; Hansen and Koehler, 2005, 641).

While the backlash to the 2000 German Nationality Act can be seen as a victory for politicized anti-immigrant forces (Hansen and Koehler, 2005), actual retrenchment in German naturalization policy in the decade since has not been particularly large in magnitude. What backlash has occurred on immigration policies has mostly been limited to admissions and asylum policies, with only slight movements on naturalization policy (some slight
additional restrictions on integration tests on the one hand, some further easing of dual citizenship on the other). The fact that the number of naturalizations did not drastically spike following the 2000 laws may have also eased the political pressure on this particular aspect of policy (Hailbronner, 2010, p. 20).

Table 2: Manifesto and Vote Share Data: Germany

<table>
<thead>
<tr>
<th>Year</th>
<th>% SPD Vote</th>
<th>% PRR Vote</th>
<th>SPD Manifesto: Multiculturalism (positive)</th>
<th>SPD Manifesto: Multiculturalism (negative)</th>
<th>SPD Manifesto: Disadvantaged Minorities (+)</th>
<th>SPD Manifesto: Labor Groups (+)</th>
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Manifesto results are the % of year’s manifesto devoted to the topic, with positive or negative valence.

PRR Parties included: Nationaldemokratische Partei Deutschlands, Deutsche Volksunion, Die Republikaner

Sources: MRG (2010); Bundeswahlleiter

If we look at Table 3, we can see that the overall positions of the SPD with regard to immigrant issues does not appear to have shifted drastically in the last decade, either. Favorable references to “disadvantaged minorities” took up about the same share of the party’s manifesto (around 1 percent) in 1998, 2002, and 2005. The number of references to multiculturalism wavered slightly, with a slight uptick in favorable references at the 2002 election, but with more negative than positive references in 2005. The amount of space devoted to labor groups over this time period remained about the same. On the one hand, then, issues pertaining to immigration seem to take up a small portion of the SPD’s manifesto, but they have apparently maintained their slightly favorable position on these issues in the past decade, despite claims of a “restrictive backlash.” An interesting test of this will be what comes of the SPD’s position to slightly increase its focus on multiculturalism and disadvantaged minorities in 2009, when it also suffered larger electoral losses. If the SPD sees these as causally connected, then the steady support offered over the last few elections may indeed be subject to a new calculus.

In the German case, then, we see that the threat of losing votes over immigration issues did seem to be enough to halt the trajectory of liberalization being pursued by the SPD. This happened even in the absence of viable radical right parties although, given increasing opposition within the CDU/CSU in the late 1990s and early 2000s, it was hardly unthinkable that the Christian Democrats could capture these votes. While these constraints may explain
the end of policy liberalization, we see that the Social Democrats were eager to pursue the extension of citizenship to this new, potential constituency and took the opportunity to do so at the crucial junctures where such an expansion was possible.

Netherlands

Citizenship acquisition policy in The Netherlands underwent a large degree of liberalization in the 1980s and 1990s. The most critical piece of legislation here was the 1984 Dutch Nationality Act, which allowed for any adult immigrant who satisfied a few criteria (five years' residence, having shown oneself to not be a danger to public morals or security, having already obtained a residence permit) to apply for citizenship. While it was not guaranteed that citizenship would be granted, the process of applying was streamlined and, for the first time, applicants could appeal if they were denied.

Prior to this legislation, the Dutch citizenship regime had been based primarily on *ius sanguinus*, but since World War II it had been undergoing a series of small, minor shifts. In 1953, third-generation migrants were granted the opportunity to naturalize as a way to cope with numbers of people living in the Netherlands but technically as Belgians, and vice versa. Naturalization was promoted in the 1960s as a way of re-integrating Germans and other highly acclimated residents who were otherwise outside the bounds of legal citizenship. Independence for Indonesia (1949) and Suriname (1975) also created groups of new citizens— as well as citizens of the new countries with a potential claim on Dutch citizenship (van Oers, de Hart and Groenendijk, 2010, pp. 5-6, 10-11) As a result, while the 1984 Act was more significant in degree, it in many ways consolidated a slow process of citizenship liberalization, granting large numbers of people the right to seek, if not automatically acquire, Dutch nationality. These changes also reflected the beginning of a shift from multicultural policies to more assimilationist policies; prior to the 1980s it was largely assumed not only that non-Dutch minorities should not be naturalized in large numbers, but that they should not *want* to be naturalized en masse. The pillarized system that had been developed to manage religious differences in an earlier era, which relied on parallel and separate institutions, were thought to be capable of meeting any demands that immigrant groups might have without limiting their cultural identity and group cohesion (Entzinger, 2006; Vasta, 2007)

Despite some political conflict over the 1984 act, with the PvdA opposing the required renunciation of former citizenship contained in the new act, the issue remained largely
unpoliticiated. Afterward, the parties continued to take somewhat opposing stances, with the PvdA and other parties of the left favoring further extensions and the allowance of dual citizenship, while the Liberals (VVD) and other parties of the right opposed any expansion of dual citizenship. Yet, the issue’s salience remained low. In 1991, the governing Christian Democrats (Christen-Democratisch Appèl, CDA) proposed a bargain with the PvdA that would allow for immigrants to naturalize without necessarily giving up their prior citizenship. At first, this occurred 


Once the PvdA formed a government after the elections of 1994, another bill was proposed and passed which would have allowed for dual citizenship, but it was held up in the upper house (which was not controlled by parties of the left at the time). Finally, in 1997, a bill was passed which reasserted the need to renounce foreign citizenship but which also codified many of the exceptions which had become commonly accepted over the course of the debate. The left therefore stayed consistently in favor of naturalization expansion through this period and was, subject to the constraints on their governing power, able to pass a series of small, expansionary reforms. The total effect of these piecemeal and often 

\textit{de facto} regulations was not necessarily small, however, as the number of citizens with dual nationality increased from just over 600,000 in 1998, passing 1 million in 2006 and reaching a level of just over 1,150,000 today.\footnote{A jump from just under 3.9 percent of the population to just under 7 percent}

The PvdA began to back away from a strong position on expanding citizenship policy after 1998, however. While still in government in 2000, the PvdA accepted a proposal by the mainstream right parties that introduced a language requirement to naturalize. While this proposal, as implemented in the 2003 Dutch Nationality Act, also contained a number of slight further expansions of eligibility for naturalization, it also marked a particularly firm policy shift toward integration rather than multiculturalism, in keeping with a political discourse that was increasingly moving in this direction (van Oers, de Hart and Groenendijk, 2010, p. 42). From a practical perspective, it also marked an inflection point in the number of applications for citizenship and reversed a trend that had increased throughout the 1990s. Once this requirement was introduced, it was easy to extend; after a CDA-led government took office in 2002 the language requirements were increased, and then expanded to include...
a more broad “integration exam” after 2007.

In addition to the PvdA’s stance and relative power, one other factor that varied in this time period was the level of turnout among immigrant voters. Starting from an initial position somewhat lower than the average population, the number of immigrants who turned out to vote dropped in the period from 1994 to 2003. The degree to which it dropped varied somewhat across groups, but this decline in participation affected each of the four of the major immigrant groups in the Netherlands (Turks, Moroccans, Antilleans, and Surinamese). For Turks and Moroccans, however, this trend reversed itself starting in the 2006 election. While the polling data used may overestimate the levels of immigrants who actually turn out to vote, there are at least indications that turnout, while not increasing further, is holding steady (Michon, Tillie and van Heelsum, 2007; FORUM, 2010, 2011). If so, and if parties of the left are taking immigrant voters as a serious constituency, we should expect this to act as a form of pressure on their policy positions.

### Table 3: Manifesto and Vote Share Data: Netherlands

<table>
<thead>
<tr>
<th>Year</th>
<th>% PvdA Vote</th>
<th>% PRR Vote</th>
<th>PvdA Manifesto: Multiculturalism (+)</th>
<th>PvdA Manifesto: Multiculturalism (-)</th>
<th>PvdA Manifesto: Disadvantaged Minorities (+)</th>
<th>PvdA Manifesto: Labor Groups (+)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1981</td>
<td>28.3</td>
<td>0.3</td>
<td>.30</td>
<td>.00</td>
<td>.30</td>
<td>1.40</td>
</tr>
<tr>
<td>1982</td>
<td>28.4</td>
<td>0.9</td>
<td>.40</td>
<td>.00</td>
<td>3.10</td>
<td>2.10</td>
</tr>
<tr>
<td>1986</td>
<td>33.3</td>
<td>0.5</td>
<td>.20</td>
<td>.00</td>
<td>3.30</td>
<td>3.10</td>
</tr>
<tr>
<td>1989</td>
<td>33.9</td>
<td>0.9</td>
<td>.40</td>
<td>.00</td>
<td>3.50</td>
<td>3.30</td>
</tr>
<tr>
<td>1994</td>
<td>24.0</td>
<td>2.8</td>
<td>.18</td>
<td>.04</td>
<td>3.64</td>
<td>1.49</td>
</tr>
<tr>
<td>1998</td>
<td>28.9</td>
<td>0.6</td>
<td>.64</td>
<td>.34</td>
<td>5.12</td>
<td>2.02</td>
</tr>
<tr>
<td>2002</td>
<td>15.1</td>
<td>17.0</td>
<td>.59</td>
<td>.20</td>
<td>2.31</td>
<td>1.95</td>
</tr>
<tr>
<td>2003</td>
<td>27.3</td>
<td>5.7</td>
<td>.90</td>
<td>1.75</td>
<td>3.51</td>
<td>2.51</td>
</tr>
<tr>
<td>2006</td>
<td>21.2</td>
<td>6.7</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>2010</td>
<td>19.6</td>
<td>16.0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Manifesto results are the % of year’s manifesto devoted to the topic, with positive or negative valence. PRR Parties included: Centrumpartij, Centrumdemocraten, Lijst Pim Fortuyn, Partij voor de Vrijheid, Één NL, Trouw op Nederland. Sources: MRG (2010); Kiesraad

We can make some further inferences from the manifesto and election results data in Table 2. Over this first period, the Labour party spent a reasonable amount of its manifesto defending the position of disadvantaged minorities in the country, and while the fraction of the manifesto regarding multiculturalism remained small, it maintained an very positive valence up until 1998. At the same time, the amount of space devoted to labor groups increased somewhat, implying that the party was at least not abandoning a verbal commitment to supporting labor unions and its working-class support at this time period. The first signs of negative statements about multiculturalism come in 1998, before the rise of the first serious challenger on the far right—the Lijst Pim Fortuyn (LPF)—but it is not until 2003 that
the Labour Party starts to speak more negatively than positively about multiculturalism. Likewise, while small in magnitude, there is concurrently a slight uptick in the amount of space devoted to support for labor groups. While the Comparative Manifesto Project does not have data for the most recent (2010) elections, a glance at the PvdA manifesto from the most recent parliamentary election indicates that expansionary naturalization policies are still not on the agenda. While the party supports the increased availability of language classes, they also affirm their support for language learning requirements (p. 61). Furthermore, the party explicitly indicates its opposition to current levels of migration for the purposes of marriage (p. 62). Thus while the periods of expansionary and restrictive policy do tend to mirror the vote share of the radical right, they also seem to mirror a period of hesitation and reversal on the part of the PvdA on policies of immigration in general, and of a retreat to traditional constituencies which actually preceded the rise of the populist right by a few years. The strength of the Party for Freedom (Partij voor de Vrijheid, PVV), and the LPF before it, seem to have structured the debate over citizenship policies in a more restrictive direction. If the position of the PvdA is truly an important input, however, it is not unthinkable that the desire to appeal to immigrant constituencies may cause it to return to its more expansive policy views of earlier decades even if the PVV consolidates its place in the Dutch party system—nor is it impossible that the PvdA will feel unable to escape its more restrictive appeals to traditional voters, even if the PVV cannot sustain itself.

**Denmark**

The Danish case much more clearly reflects the importance of the radical right as the primary motivator in politics. It has been clearer here that a large sector of the disaffected working class has shifted its support to the Danish People’s Party (Dansk Folkeparti, DF), and that populist radical right parties have succeeded in pulling citizenship policy much further to the right. Yet even here, the actions of the mainstream left illustrate the underlying electoral dynamics that have led other social democratic parties to push for more expansionary policies. When the Danish Social Democrats (Socialdemokraterne, SD) did not see the radical right as a potential threat, expanding citizenship policies remained a priority and this led at best to some policy successes, and at a minimum to a more firm opposition to restrictive policy proposals. Only during the second resurgence of the radical right, following the formation of the DF, did the Social Democrats back down from their
position, leading to an overall restrictive trend in citizenship policy.

The Progress Party (Fremskridspartiet, FRP) was the first to make immigration a politicized issue, and unlike in many countries where the politicization of immigration started in the realm of admissions, naturalization policy was the location of the first politicized reaction in Denmark. The reason usually cited for this is the way in which naturalizations must be processed in Denmark: each individual naturalization must be approved by the parliament (Ersbøll, 2010, p. 15; Howard, 2009, 99). This rule, a remnant of the 1849 constitution, had little impact in the modern era until the 1970s, as it had become common practice to simply refrain from allowing debate such bills. What started with opposition to a single application in 1976 became a uniform objection to such applications on the part of the Progress Party by 1978. In the 1980s and 1990s, the direction of policy was somewhat back-and-forth, with the FRP able to use its leverage to institute minor restrictions (such as the introduction of application fees for naturalization), but with considerable push-back from the mainstream parties. Admissions policies, on the other hand, were actually liberalized in the 1980s through the efforts of the opposition Social Democrats (Ersbøll, 2010, p. 16). During the Social Democrats’ time in government from 1993 to 2001, they had much less success in enacting expansive policies, and toward the end of this period, the party started to withdraw from its earlier preferences. While the radical right had weakened for a few election cycles, the dissolution of the FRP founding of the DF in 1995 saw the beginning of an electoral resurgence on the right. Meanwhile, other parties of the opposition which had traditionally avoided strong stances on issues of immigration began to respond to immigration and citizenship proposals, and to challenge the government’s position. As such, no further admissions or citizenship expansions occurred during the SD’s time in power, and their defeat in 2001 ushered in a center-right minority government supported by the DF. At this point, a further series of naturalization restrictions were enacted.

While institutional factors (such as naturalization by statute) and party dynamics (the ability of the radical right to set agendas) might also explain the left’s overall lack of success on admissions policy, what caused the Social Democrats to back away from the vocal support for immigrants that they had maintained during the Progress Party’s initial surge? The main answer is where the surge for radical right support was coming from. Traditionally, Denmark had an extremely high level of voter partisan loyalty, and Danish voters were likely to switch their support only to the parties ideologically nearest the party they traditionally
supported. Large ideological shifts to a protest party could thus have been seen as much less likely to occur here than in other countries. The Progress Party had accordingly found its support particularly among the self-employed and middle class, and so given its ideological contrast and its different base of support it was not likely to be seen as a threat to any part of the SD’s constituency. In contrast to this pattern, the DF drew more from the working class base that had historically supported parties of the left (Bjørklund and Andersen, 1999, p. 13). Thus, not only was the opposition more strongly arrayed against the Social Democrats on the issue of immigration in the later period, but their own potential sources of support were also starting to look more tenuous.

Table 4: Manifesto and Vote Share Data: Denmark

<table>
<thead>
<tr>
<th>Year</th>
<th>% SD Vote</th>
<th>% PRR Vote</th>
<th>SD Manifesto: Multiculturalism (positive)</th>
<th>SD Manifesto: Multiculturalism (negative)</th>
<th>SD Manifesto: Disadvantaged Minorities (+)</th>
<th>SD Manifesto: Labor Groups (+)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1984</td>
<td>36.6</td>
<td>3.6</td>
<td>0.0</td>
<td>0.0</td>
<td>1.38</td>
<td>3.55</td>
</tr>
<tr>
<td>1987</td>
<td>29.3</td>
<td>4.8</td>
<td>0.81</td>
<td>0.0</td>
<td>0.0</td>
<td>7.26</td>
</tr>
<tr>
<td>1988</td>
<td>29.8</td>
<td>9.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>17.65</td>
</tr>
<tr>
<td>1990</td>
<td>37.4</td>
<td>6.4</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>11.29</td>
</tr>
<tr>
<td>1994</td>
<td>34.6</td>
<td>6.4</td>
<td>0.92</td>
<td>0.0</td>
<td>2.76</td>
<td>7.37</td>
</tr>
<tr>
<td>1998</td>
<td>35.9</td>
<td>9.8</td>
<td>1.94</td>
<td>4.99</td>
<td>0.0</td>
<td>6.65</td>
</tr>
<tr>
<td>2001</td>
<td>29.1</td>
<td>12.6</td>
<td>2.14</td>
<td>2.85</td>
<td>0.0</td>
<td>3.21</td>
</tr>
<tr>
<td>2005</td>
<td>25.8</td>
<td>13.2</td>
<td>1.09</td>
<td>9.45</td>
<td>0.0</td>
<td>3.27</td>
</tr>
<tr>
<td>2007</td>
<td>25.5</td>
<td>13.8</td>
<td>0.85</td>
<td>3.42</td>
<td>7.69</td>
<td>1.71</td>
</tr>
</tbody>
</table>

Manifesto results are the % of year’s manifesto devoted to the topic, with positive or negative valence.
PRR Parties included: Fremskridtspartiet, Dansk Folkeparti
Sources: MRP (2010); Inter-Parliamentary Union 2008; Álvaro Rivera 2010

Looking at the manifesto data for Denmark in Table 4, an interesting observation is that the Social Democrats have not only retreated quickly from support for multicultural policies (with a net negative attitude toward them for the last few elections), but the amount of party manifestos focused on labor unions has also decreased drastically. In other words, it might appear on the surface that the party has not only turned its attention away from the potential immigrant constituency, but also from its traditional constituency. Furthermore, the withdrawal on both policies seems to coincide with the surge in support for the DF starting in 1998. On the other hand, the proportion of the SD manifesto positively referencing disadvantaged minorities has increased. While it is difficult to retrace the exact tone used from the aggregate data, it is possible that this indicates a continued but less explicit outreach effort to potential voters in the immigrant community, focusing more on material disadvantage than the highly politicized issue of multiculturalism. One interesting finding that has emerged is that among Danish immigrants who are eligible to vote, turnout

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*While Denmark did experience quite a high level of electoral volatility at the party level, voter surveys have indicated that this is not due to strong individual-level shifts in partisan identification, but rather small shifts in voting behavior (see, e.g., Bille and Pedersen, 2004, p. 217)*
has remained high (at least compared with the other Scandinavian countries); the openness of preferential voting to candidates of immigrant background has been cited as a primary reason for this (Goul Andersen and Hoff, 2001, p. 233). While it is less clear that the Danish Social Democrats have adopted immigrants as their primary future constituency, the fact that manifestos have started to mention the place of disadvantaged minorities, in combination with the political participation rates of minority groups relative to their eligibility, indicates that the underlying incentive structure is still operating in this case and may cause them to once again pursue more expansive policies.

Conclusion

What the cases above have shown us is that the decisions made by the mainstream left appear to have quite an effect on citizenship policies in European countries. Where the left has pursued the liberalization of these policies, they have generally been adopted when social democratic parties have been in power—and even sometimes when they have been in opposition. When these parties have not actively supported the liberalization of these policies, there has been a trend toward retrenchment and policies have become more restrictive. The fact that most social democratic parties have a natural constituency among immigrant-origin voters gives them a strong incentive to expand the electorate via the easing of naturalization requirements, although they face a competing constraint that stems from their traditional constituency’s propensity to support anti-immigrant measures. While the radical right has been effective where it has been a serious electoral threat, it has been effective insofar as it has caused social democratic parties to back down from their expansionary stance. Pointing to these parties as the cause of restrictive citizenship policy, then, might accurately describe the pattern but might also miss the ultimate cause, the desire and ability of the mainstream left to successfully advocate for more liberal citizenship policies.

Certainly further research is needed to determine the precise determinants of social democratic parties’ support for expansive naturalization policies, given the electorates for whom they are competing. By doing this, we may be able to better predict if and when such policies will be successfully enacted in the future, where immigration is likely to remain a highly salient and politicized issue.
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