

**The Changing Boundaries of Citizenship.
A Review and a Research Agenda**

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Introduction: a concept again à la mode

For centuries, struggles over the boundaries of citizenship have been at the centre of political debates. Citizenship, broadly defined, is not simply a way to identify subjects with political rights in any abstract way. It is also an important political tool for the state, which, in defining citizenship, sets the conditions for full membership in the political community. In addition, it is a way for political actors who may use citizenship vocabulary to seek inclusion in the polity.

Concerns about Canadian “citizenship” were present throughout the last century and remain on the agenda today. In the past, as today, they focussed on a range of issues. Efforts to clarify regulations about nationality and immigration prompted Canada to become the first Commonwealth country to establish an autonomous citizenship (even though Canadians remained British subjects for another decade). But the *Citizenship Act*, as many pointed out at the time, was also about recognising Canadian identity and diversity. Writing in celebration of the *Act*, J.W. Lindal (1947: 78-79) said,

“Canada is a miniature world. It has problems of geography, climate, resources, language and religion. Yet out of a diversity of racial groups scattered over half a continent, the builders of Canada have moulded a nation with a spirit strong and distinctly its own. But Canadianism is a blend – the very diversity has softened, and at the same time broadened it, but not detracted from its inherent worth.”

Alternatively, the notion was used sometimes when discussing the education of the young and their preparation for citizenship. Indeed, civic education has always been an important dimension of public education programs. As early as 1899 John Millar, the Deputy Minister of Education for Ontario, wrote a book addressed to young people called *Canadian Citizenship*. This small volume started with the assertion: “The end of all government is the cultivation of good citizenship” (1899: 9).

In the last decades, we have seen a resurgence of attention to citizenship in a more fundamental way. A number of states have established new ministries and put aside time

to celebrate citizenship.¹ At the same time, we have seen a proliferation of claims explicitly framed in these terms. As Ronald Beiner (1995: 1) of the University of Toronto puts it:

Nationalism, ethnic strife, the fragmentation of previously united multinational political communities ... place the problem of citizenship - of what draws a body of citizens together into a coherent and stably organized political community, and keeps that allegiance durable - at the center of theoretical concern.

While we will retain Beiner's notion that there is a "problem of citizenship", we will locate the roots of that problem beyond the issues he raises, that is those of ethnicity and multinational cohabitation. Questions about the ties that bind obviously arise because of such ethnic and national differences, but they also arise around whether and how to recognise social, economic, gender and other differences. Thus current debates about citizenship should be understood in broad terms, touching on the definition of the political community and the conditions of inclusion – and exclusion – in the community (who belongs and under what conditions).

This proliferation of claims framed as ones of citizenship is widespread. For example, Latin American movements for democracy and civil rights as well as mobilisations of the poor frame their claims in terms of citizenship, such that “l'accès à la citoyenneté commence à être vue comme l'accession aux conditions économiques, sociales et culturelles de l'exercice des droits politiques” (Marques-Pereira and Bizberg, 1995: 7). Women's movements, especially ones in which mothers bear witness to their “disappeared children”, frame their opposition in terms of citizenship (Blacklock and Jenson, 1998). In France, *le mouvement social*, which is a broad based aggregation of associations and actors seeking to address social inequalities and exclusion, agitates for improved citizenship (Helly, 1999). In Belgium, *le mouvement blanc*, which arose out of the governmental scandals and accusations of police complicity with the paedophile Marc Dutroux, names itself a movement for citizenship (Vogel, 1999). Citizenship has also become a central concept in debates about Aboriginal rights in several countries (Yashar, 1998).

These varied movements, speaking in the name of "citizens" or making claims in the name of "citizenship", have one thing in common. They are all addressing the relationship between the state and the individuals who find themselves living within its borders. They are all claims for greater voice and better recognition within the polity. They are thereby challenging the boundaries of the political community.

This tendency to frame political struggles in terms of "citizenship claims" turns our attention to the other side of the relationship. Citizenship does not exist without states. Growing preoccupation with the condition of social cohesion and democratic politics has led many in government and policy circles to express concern about citizenship. In diverse and fragmented societies, marked by profound restructuring of the economic and social order, there are challenges to the capacity of state institutions to ensure inclusion and participation for all who are formally members of the political community. Moreover, the immigration and refugee flows associated with globalisation, as well as movement of persons within areas of economic free trade, all raise fundamental issues about who is in and who is out, that is, precisely where the boundaries of citizenship are. The popularity of the concept of social cohesion (Jenson 1998) as well as efforts to remake democratic practices, re-knit social solidarity, and re-think the rights and responsibilities of citizens and denizens, all suggest that states are engaged in surveying their borders of citizenship.

This "return of the citizen" (Kymlicka and Norman, 1995) in political as well as academic debates is, therefore, not the result of chance. Rather, it is the fruit of major transformations in modern polities and political economies. It is a signal as well as a symptom of profound changes and questioning.

Citizenship as a double relationship

Despite a tendency in popular parlance to "stretch" the concept in all sorts of directions, by speaking of "citizens of the world" and so on, citizenship has always been intimately - indeed, exclusively - associated with membership in a specifically defined political community. From ancient Greece through the end of feudalism, the building of the

modern European state, to the dawn of the 21st century, citizenship has been about two relationships:

- *the status of members of a political community in the face of political authority*
- *the relationships of mutual support and solidarity that exist among such members because they are members of that community.*

In the broadest sense, “good citizenship” involves a relation of civility and good behaviour among individuals, but to be truly citizenship it must also involve a state as a political community. It is the historically determined shape of these two relationships – among individuals that share a relationship with a state and between the individual and the state – that we define as the *boundaries of citizenship*.

In this paper we will not be tempted into metaphorical extensions which utilise it to consider private relations and non-political forms of social life, or those unrelated to national states. Hewing to this strict definition does not mean, however, and as will become clear below, that we fail to recognise that the current moment in time is one of change. Because of the rethinking of the political and the state that is currently occurring, the boundaries of citizenship are being refashioned if not transformed.

Starting from this position, our objective in this paper is to identify the various issues and debates currently taking place around the notion of citizenship and to suggest an approach to make sense of the current restructuring of citizenship regimes in Canada and elsewhere.² To begin to do so, we will first suggest a definition of citizenship as a dynamic relation between three complementary dimensions: rights and responsibilities, access and belonging.³ We will then explore four areas in which challenges to the current understanding of citizenship are taking place. Finally we will consider some areas where further research might be undertaken in the perspective of improving our understanding of these changes and their impact on governance, state-citizen relations, well-being, and democratic practices.

Dimensions of Citizenship

Citizenship, understood as a relationship between individual and the state as well as among individuals, is the concrete expression of the fundamental principle of equality among members of the political community. This principle is at the heart of modern politics. For Jean Bodin writing about the republic in the 16th century, as later for J-J Rousseau and the English liberals, "citizens are equal in all rights and prerogatives".⁴ Citizenship could not exist where feudal or patrimonial social relations were still in place (Marshall, 1964: 79).

A fundamental change which announced the modern polity, as symbolised by the French Revolution, involved defining the individual not simply as subject but also as bearer of rights. As Reinhard Bendix (1964: 66-67) put it in his classic text:

... medieval political life depends on the link between hereditary or spiritual rank in society, control over land as the principal economic resource, and the exercise of public authority. ... Rights and liberties are extended to groups, corporations, estates rather than to individual subjects; representation in judicial and legislative bodies is channeled through traditionally privileged estates. Within this framework, no immediate rights are accorded to subjects in positions of economic dependence, such as tenants, journeymen, workers and servants: at best they are classified under the household of their master and represented through him and his estate. This system is broken by the twin revolutions of the West - the political and the industrial - which lead to the eventual recognition of the rights of citizenship for all adults....

With these major social transformations, the individual became a citizen, recognised in his humanity, the bearer of rights and who, through his participation in society, expressed his obligations. Thus, citizenship entailed recognising individuals, achieved via a guarantee of protections against state interference, and in particular the free individual.

Such a notion also invokes the state as guarantor of equality. But what state? The notion of the individual as bearer of rights was accompanied by the idea of citizens obligated to participate in societal - that is, collective - choices. How to ensure this would happen and not interfere with the liberty so dear to political philosophers was the problem of citizenship through the 18th and 19th centuries.

This was the time the modern state came into existence. Built on a concept of popular sovereignty as well as national sovereignty, the modern state emerged from two different political forms. One was the city-state of the Renaissance (Held, 1993: 16-18). Notions of public, distinguished from private, space and public action underpinned these city-states. They recognised a citizen, the *bourgeois*, who gained that status simply as an individual. The break with feudal ties was evident, in that the bourgeois was politically and legally autonomous, defined simply by his allegiance to the city (*bourg*).⁵

A sub-group of these city-states were republics. Jean Bodin, J-J Rousseau and Condorcet all wrote of republican government, while the American revolutionaries, just as the French, established a republic as the expression of their principles. These republics included a widened (albeit limited and never clearly delimited, at least in the French case) suffrage, as well as establishing the citizen's responsibility to bear arms in defence of the republic. It was, however, only in the 19th century that universal male suffrage was firmly installed in these two countries.

The second model for the modern state, the constitutionally limited monarchy, emerged over an even longer time period. Gradually the sovereign's power was constrained by the obligation to seek approval for the fundamental actions of governing, that is, raising an army and collecting taxes. In exchange for being taxed, subjects of the Crown would be protected from threats coming from within and without. But they were not only obligated to pay taxes; they also had the right to approve them. Thus, the *Magna Carta* and the *Bill of Rights* of 1689 are also foundational texts for modern citizenship, providing the basic protections of civil rights, in a relationship of exchange. The trade-off was safety and protection for those included in the polity against the responsibilities of participation. The

complicated decision-making involved required new institutions; ultimately the representative institutions of feudalism became those of parliamentary democracy, within which the power to tax and the matter of who had the right to take decisions about taxation were central (Tilly, 1990; Elias, 1991).

Republican histories and those of constitutional monarchies converged over time, to generate common institutional forms of self-government and to install the notion that democratic participation transformed subjects into citizens. In light of this converging history, Diane Lamoureux (1991: 55) writes:

Ce qui caractérise fondamentalement la notion moderne de citoyenneté - et l'associe étroitement à celle de la démocratie - c'est *la capacité de participer à la vie du corps politique*. Le citoyen, non seulement est soumis à une autorité politique dans la mesure justement où il ne fait plus totalement corps avec la cité, mais également participe à la formation de cette autorité.

We see, then, that from the beginning citizenship was a complex bundle of rights and obligations, equally available to those identified as citizens. The institutions of liberal democracy ultimately became the key to the successful matching of rights and responsibilities, as well as becoming the institutions through which collective choice could be exercised. It is this story, played out differently in Britain and on the Continent as well as in the American republic, which so fascinated Alexis de Tocqueville in the fourth decade of the 19th century.

This history also led the sociologist T.H. Marshall to recount a historical trajectory of modern citizenship.⁶ To simplify his rich historical argument, Marshall described the expansion of citizenship rights over the recent centuries as a constant search for stability and equilibrium between democratic equality and guarantees of individual freedom. According to Marshall, three categories of rights emerged in a historical sequence to create this equilibrium: civil rights in the 18th century, political rights in the 19th and social rights in the 20th.⁷

Civil rights guarantee fundamental freedoms (such as freedom of expression, religion, and so on), and particularly the right to follow the occupation of one's choice. Marshall associated civil rights with the end of the guild system and city-based restrictions on trade and commerce; he focussed on the emergence of a market in labour and free trade within national boundaries (1964: 82). *Political rights*, gradually extended to the whole adult population, included the right to vote and to stand as a candidate. If such rights had long existed for some social groups, the status of a citizenship right required they be extended to all (Marshall, 1964: 85). Finally, he described *social rights*, such as the right to education, access to housing and health services or income security. This third category is associated with a fundamental transformation of our thinking on equality. It became more than a formal principle (equality in status), involving some measure of socio-economic reality (equality in practice).

Therefore, **one dimension** of citizenship that has emerged from its history is that of **rights and responsibilities**, what the state owes to citizens, citizens owe to the state and citizens owe to each other. Civil, political and then social rights were obtained, from the beginning, in exchange for two important citizenship acts - informed participation in the life of the polity and support, through taxes as well as the bearing of arms, of its works and for its protection.

Thus, for example, in a 1927 textbook written for the public schools of Alberta, James McCaig (1927: Chapter XXI) provided a list of the rights and duties of Canadians, which included many of those, including social rights, mentioned 20 years later by T.H.

Marshall:

- The right to protection of life and property
- The right to protection against disease
- The right to free speech
- The right to freedom of worship
- The right to freedom from false imprisonment
- The right to trial by jury
- The right to healthful surroundings
- The right to a good education

- The duty of obedience to law
- The duty of paying taxes
- The duty of military service
- The duty of voting

The duty of office-holding
The duty of jury service
The duty of keeping healthy

Nonetheless, the specific rights and their extension varied in time and place.

Demography, power relations (including the capacity of certain classes or groups to assert their claims), particular historical trajectories all influenced the conception of rights and duties in each specific political community. It is for concrete historical reasons that freedom of expression is so important in the definition of citizenship rights in the United States, and less important in France, for example.⁸

The recognition of rights may well remain little more than symbolic if there are no mechanisms to guarantee their full realisation, moreover. The full exercise of citizenship rights has always depended upon the creation or reform of public institutions which guarantee their continuity. For Marshall (1964: 78-79), for example, civil rights required access to a judicial system. Parliaments, electoral regimes, and later political parties, became the guarantors of political rights. Public services for education, health, and income security became the institutionalised expression of social solidarity and social rights. Thus, our **second dimension**, that is **access**, is closely linked, although not reduced to, the first.

From the beginning, democratic theorists also understood that citizens had to be prepared to assume the democratic duties associated with universal citizenship. The difference between a subject and a citizen was not just the right to participate but also the capacity to do so. This idea had two important consequences. First, full citizenship depended on access to political power. It is this understanding which had led, by early modernity, to replacement of divine authority (expressed by a sovereign or other institutions combining religious and political authority) with the institutions of self-government, justified in secular terms. Over time this access was broadened, each time that social and economic mobilisation and change forced recognition that additional categories of the population merited full inclusion in the polity. Thus, from free men to all men, from property owners to all men, from men to women, from native born to naturalised, full political rights were

gradually extended. In the process, the idea that democracy was the only legitimate form of political power became hegemonic.

This understanding had a second consequence. Democratic theorists understood that decreeing rights did not mean that meaningful access automatically followed. As Dominique Schnapper (1994: 95) describes it, "...les citoyens doivent disposer des moyens nécessaires pour exercer *concrètement* leurs droits".

Institutional guarantees again became important. By the 19th century, public schools had become the major institution to ensure that young people could become full citizens. This involved more than teaching "civics"; it required the development of intellectual skills defined as necessary to the reasoning and other capacities that citizens needed. Then in the 20th century, basic levels of material well-being were identified as sustaining meaningful access to the practices of citizenship and to fostering engagement. Thus, the degree of access may vary within and across political communities, depending on institutional design, and according to the support given by the state and the community to groups disadvantaged because of their social, economic or cultural situation.

Access is not automatically achieved; it too may require efforts to foster equality. Strategies to improve access may involve mechanisms to ensure meaningful participation in the democratic process and the full exercise of citizenship rights, all which vary over time and place. Moreover, struggles to gain better access for certain categories of citizen also contribute to the transformation of institutional practices, changing boundaries of access as well as its mechanisms.

The **third dimension** which has always been an element of the definition of citizenship is that of **belonging**.⁹ To be a citizen means to be part of a specific political community, to participate in its economic and social life and to enjoy its support in case of need. Citizenship defines the boundaries of belonging, giving specific recognition and status to the ones entitled to participate and benefit from the political community. From the time of ancient Greece, the status of citizen identified those who were part of the community,

distinguishing them from those excluded from it, whether because they were strangers or because they were not deemed deserving.

Again, the boundaries of inclusion and exclusion vary from one state to another, as well as over time within a single state. For example, for centuries only free men belonged to the community of citizens; their female relatives and children, as well servants and other dependants had claims to protection but not to citizenship. Women had - albeit limited - civil rights long before they had political rights. Indeed, because their rights were so limited they could not be full citizens. They were nationals without citizenship. Because of this non-citizen status, well into the 20th century they lost their nationality upon marriage to a foreigner. Nor could they pass their nationality onto their children.

The state plays an essential role in delimiting the boundaries of belonging and the result of such process is to create a political identity, based on the distinction between members and non-members. This common identity plays a role in maintaining social solidarity despite important cultural, economic and social differences among people with often competing interests. Again according to Marshall:

“feudal societies were bound together by a fiction: the fiction of kinship, or the fiction of common descent. Citizenship requires a different kind of bond, a direct sense of community membership based on loyalty to a civilisation which is a common possession of all.” (1964: 77).

Each of the three elements of citizenship (rights, access, belonging) can be defined separately. They cannot be understood independently from each other, however. Rights and responsibilities mean little without proper access and without proper recognition of membership. A real attachment to the community, essential for the exercise of democratic participation, is difficult without proper recognition of rights and access to political power. Citizenship thus involves a triangular relationship among rights, access and belonging.

In this introductory section we have insisted on the fact that these dimensions emerged through historical processes that varied considerably from one state to another. We have also insisted on the fact that all these dimensions are shaped by government practices and political struggles. Citizenship regimes are thus in constant redefinition and transformation. In fact, for the last four centuries claims to alter, expand, and restrain the three dimensions of citizenship have provoked political mobilisation and action. From the *Magna Carta* to Meech Lake, from the *Bill of Rights* of 1689 to the *Charter of Rights and Freedoms*, citizens have contested, debated and redesigned the boundaries of their relationship to political authority.

It is not surprising, then, that challenges to the boundaries of citizenship occupy such an important place today. The rest of the paper will explore four challenges to the borders citizenship: the challenge of social and cultural diversity, the challenge to the state as the “natural location” of citizenship, the challenge to social citizenship rights in the current restructuring of global economy and the challenge of democratic participation. As we will see, the boundaries of citizenship are being questioned, redefined and transformed in those debates.

The challenge of diversity:

The first challenge to identifying the borders of modern citizenship is perhaps the best documented and most discussed. Often those in quest of recognition of cultural diversity are seeking to redesign the content of rights, the way access works, and most often the definition of belonging within citizen regimes. Not surprisingly, then, the debate is lively and many issues are still on the table. Indeed, this challenge leads to some of the most difficult political disputes of the last decades.

As we have seen, the foundation stone of the project of liberal citizenship was the notion of equality among all individuals within the political community. In the classic liberal definition, citizenship is based on a “neutral” definition. *Homo publicus* is assumed to be an individual free of, or capable of rising above, cultural or particularistic attributes.¹⁰

Inclusion in the political community assumed the capacity to exercise fully the rights and responsibilities of citizenship, and the borders of belonging are defined through common attachment to them. When cultural attributes and related values are recognised as existing, they are treated *either* as beyond the reach of citizenship *or* as something to be smoothed over by good citizenship practices.

In the last five decades, thinking about these matters has changed significantly. With respect to the first way of thinking about culture, it was possible to imagine a putting aside of diversity because the borders of cultural communities and national communities were considered to correspond. For example, T.H. Marshall took for granted the cultural uniformity of “the nation” when he described the progressive expansion of citizenship rights in his native England. National consciousness, an essential component of citizenship according to Marshall, is based on “a common loyalty to a civilisation which is a common possession of all” (1964: 101). Like many of his contemporaries, Marshall’s preoccupations were much more with socio-economic disparities than cultural ones. Thus, when post-war international accords recognised the right to self-determination, the notion was that each national cultural community would have its own space of citizenship. As for recognition of cultural differences within national states, they were relegated to the private sphere, a sphere that was always of lesser political importance, less worthy of attention and isolated from it. And private institutions, especially political parties, were delegated the task of recognising difference, through their representational practices.¹¹

Canada provides an example of the second way of addressing cultural diversity. Fully aware of the wide variety of backgrounds from which citizens came, and the persisting local loyalties which limited adhesion to a single definition of “Canadian”, political discourse in the first half of the 20th century stressed the need to create a sense of Canadianism (as we saw in the quote from Lindal above). Numerous were the commentators, including Paul Martin when he introduced the *Citizenship Act*, who were well aware of Canadian diversity, both within the country and because of immigration throughout the 20th century. He wrote of his visit to Europe in 1944:

“On a dull and chilly February day, I was driven from Paris to pay respects to the Essex Scottish and other Canadians in the military cemetery at Dieppe. There were wooden crosses marking some of the graves. The final tombstones had not been erected. The racial origins of the dead were so varied: Anglo-Saxon, French, and many other backgrounds. It struck me that herein lay the character of Canada, a land of people of diverse national origins. ... Nothing has since epitomized the concept of our nation more poignantly for me than that cemetery. Of whatever origin, these men were all Canadians”. (1993: 66).

Therefore, the goal of policy in the years after 1945 was to accept diversity,¹² and give to everyone a similar set of rights and foster a sense of belonging. As Bourque and Duchastel say of the 1940s, diversity was managed in the political discourse – where “la notion de *citoyen* occupe la place centrale” – by installing another understanding of universality, one that stressed socio-economic equality:

“Ce pancanadianisme, auquel participent aussi les notions du *peuple* et de *national*, cherche à trouver dans la notion de citoyen un principe d’universalité (égalité d’accès aux services) qui, empiriquement, réunirait tous les Canadiens en une seule et même communauté.” (1993: 65)

In later years, however, both the culturally neutral and homogenous definition of the political community and one based on socio-economic equality became increasingly hard to sustain. First, by the 1960s national minorities¹³ had begun again to make claims for recognition. In addition to the Québécois and Aboriginal nationalist movements familiar to Canadians, by the 1970s the Basques, the Bretons, the Scots, and a host of other minorities around the world were framing demands for recognition of their specificity and for institutional arrangements to guarantee this cultural difference. Thus, nationalist movements have put the issue of diversity and recognition of difference on the agenda.

In the same years, there was mobilisation of claims for equality from other “minorities” that were also expressed in terms of diversity. A range of social movements (women, gays and lesbians, religious minorities) made claims for inclusion by articulating their struggle in cultural terms. Parts of the women’s movement, for example, focused on the gap between formal recognition of citizenship rights, the reality of unequal access in institutions that devalued their values and imposed male standards of behaviour, traditional masculine routes to representation and so on. Gays and lesbians, on the other hand, argued that the failure to recognise the legitimacy of their sexual preference resulted in them being denied formal and equal rights. Sometimes claims were framed in terms of civil rights. But often too, both the women’s movement and gays and lesbians criticised the supposed equal treatment of social rights, claiming that they suffered from discrimination because they did not have the same social rights as men or heterosexual families.

In all of this, these movements came to share a perspective similar to that of political theorist Iris Marion Young. She describes universal conceptions of citizenship, based on the abstract individual, as being fundamentally unjust. They oppress historically disadvantaged groups such as women and cultural minorities by imposing the norms and values of the majority as the universal ones (1989: 257).

Finally, in practical terms, it became difficult to ignore cultural diversity in political practice as the socio-demographic reality of liberal democracies shifted, both in traditional countries of immigration (such as the United States, Canada, New Zealand and Australia) and in Western Europe. Immigration itself became increasingly diverse in origin, and issues of how to include immigrant populations again appeared on the political agenda. Immigration came to be seen as posing a direct challenge to citizenship not only in terms of guarantees of access and definition of rights, but also in terms of plurality of values and definition of belonging. There was concern about the extent to which immigrants would “join” their new community, and give up previous allegiances.

As a response to the challenge of these claimants for better or different recognition of cultural diversity and the increasing feeling of alienation expressed by minorities, a range of solutions are proposed. These have followed the lines of the well-known liberal-communitarian-republican debate. Given that this debate is well-documented (Helly 1998; Weinstock 1999; Shafir 1998; Kymlicka and Norman 1994) it will only be briefly outlined here. The emphasis will be on the challenges to the three dimensions of citizenship identified above.

The central question asks how can the cohesion and the unity of the political community be maintained in a pluralist and diversified social context. Questions of inclusion, recognition of differential rights as well as conditions for the emergence of a sense of solidarity and belonging are thus central to this debate, in which diversity is often associated with fragmentation and potential social unrest (Van Gunsteren, 1998).

The liberal response to diversity

One proposal to strengthen cohesion, often adopted by left-leaning liberals, is to ensure better inclusion and better opportunities for participation through redistributive justice. The strengthening of the welfare state and social programs is supposed to have a positive effect on minorities who feel excluded.¹⁴ Although this approach rightly recognises the link between socio-economic exclusion, access and belonging, it does not directly address all the questions of cultural diversity and their political dimensions. For example, this approach informed – the now infamous – stance of the 1969 *White Paper on Indian Affairs*. It was also a response to many issues raised by the women’s movement and second-wave feminism. In the first case, the proposal was to include Aboriginal people in Canadian society by repealing “special treatment”, based on their cultural heritage and treaty rights and to institute “equal treatment” in terms of access to resources. In the case of women, there was, and still is, a lively debate within feminism about whether women form a group with different cultural values, or one which was discriminated against economically and socially and which could be integrated fully into the “mainstream” and thereby to full citizenship.

Such proposals, which focus almost exclusively on reforming access mechanisms without questioning the content of the rights regime or the complexities of cultural identities, were often rejected by minorities because they failed to recognise and especially failed to value, their own specificity. By refusing to acknowledge the cultural dimension of exclusion, this approach generated new tensions. While cultural minorities often suffer from socio-economic disadvantage, they usually see the real root of the problem as discrimination (racism, sexism, and so on) rather than simply a lack of economic resources. Therefore, they are dismayed by approaches that treat identity claims as only a channel to express socio-economic alienation.

Another response to the challenge of cultural diversity is inspired by French republicanism. It suggests focussing on civic virtues and attachment to the institutions and values associated with citizenship so as to create a sense of belonging that is not associated with cultural identities but with the capacity to participate in the polity. Republicans recognise the relevance of specific communities of belonging but argue that the state should not be identified with any of the communities it regulates. Instead, the state should foster a neutral “public community” where individuals from various backgrounds meet in search of common ground (Van Gunsteren, 1998: 21). Dominique Schnapper (1994) represents this position very well. She hopes that an increased focus on participation by everyone, and real access to political institutions and power will mediate cultural differences. In a similar way, the ideas of civic nationalism (Yael Tamir, 1993) and constitutional patriotism (Habermas, 1995) have been suggested as ways of allowing a variety of cultures with differing identities to come together. The rallying point is the notion of citizenship defined in procedural terms.

Again, the main problem with such approaches identified by their critics and those promoting recognition of diversity is that they are all attempts to depoliticise cultural identities. Thus, while recognising the existence, and even the public relevance of cultural diversity, the goal of such thinking is to prevent diversity from destabilising existing institutions and undermining existing values (such as the lay Republic). It cannot acknowledge that institutional practices may already encode cultural biases, because the

majority has already imposed its language, its historical heritage and its values in the public sphere (Van Gunsteren, 1998). As such, it offers limited insight as to the redefinition of the boundaries of belonging along cultural lines. For the same reason, it also rejects the notion of differential rights, based on cultural or other collective specificity, within a unitary citizenship regime.

The communitarian critique

Scholars interested in the fate of cultural minorities and disadvantaged groups have taken to task the notion of “neutral equality” in liberal visions of citizenship. Some of the strongest critiques of liberal citizenship come from authors associated with the communitarian school. Although an eclectic bunch,¹⁵ communitarians all conceive of the individual as embedded in a cultural environment and in a specific historical setting. While still considering citizenship as the relationship between individuals and the state, they suggest that more attention should be given to communal identities and cultural specificity in order to promote healthy citizenship, and in particular its belonging dimension.

For example, Charles Taylor (1997) demonstrates why, for him, it is impossible to define the individual without the community and without taking into account cultural practices. The institutions associated with citizenship must allow for the expression of cultural diversity and specific identities for the individual to develop a sense of belonging to the political community:

“L’identité est ce qui permet de définir l’individu face aux autres et en fonction des autres, elle permet de se distinguer mais aussi de s’associer à ceux en lequel on se reconnaît dans les diverses facettes de la vie sociale. Il est donc impossible de parler de participation pleine et entière sans une forme de reconnaissance des différences culturelles.” (Taylor, 1998:pp).

For him, cohesion of a political community is founded on its members’ sense of solidarity and belonging to that community. Such solidarity is only possible if individuals

feel fully equal (including in terms of cultural practices) within the citizenship regime. Charles Taylor uses the cases of Aboriginal peoples and French-speaking Quebecers as examples of communities that have long felt – and indeed still feel – excluded from the Canadian citizenship regime on cultural grounds.

The history of the “constitutional question” should also be read as an effort to secure the kind of recognition of national difference that the pan-Canadian citizenship regime has more and more difficulty understanding, let alone incorporating (Jenson, 1997). The contemporary Canadian citizenship regime and the “diversity model” within it recognises differences primarily as an attribute of individuals, thereby moving away from an earlier capacity to recognise communities (McRoberts, 1997). Therefore, nationalist claims for recognition and increased political autonomy are now, in fact, claims for a redefinition of the conditions of belonging within the citizenship regime in Canada.¹⁶

Cultural recognition: a new citizenship right?

Acknowledging the communitarian critique, a certain number of liberal scholars suggest including cultural rights in the definition of citizenship, again without rejecting its foundational focus on the individual. Prominent among them is Will Kymlicka.¹⁷ In his view, a liberal conception of citizenship should conceive of cultural diversity as a virtue, one that enhances rather than limits the freedom and the equality of individuals. Culture is the basis from which individuals select the values and references from which they build their own individuality. As such, everyone should be allowed to choose his or her cultural references. For such a choice to be a real one, Kymlicka argues that society must include a diversity of cultures, norms and values within it; too little diversity can stifle individuality. As such, the state has a responsibility not simply to protect but to allow for the growth of cultural diversity and groups which carry it (see his *Multicultural Citizenship*, 1995).

A similar response to diversity inspired by the communitarian critique, but this time rooted in the republican tradition, is offered by Herman van Gunsteren. In his view, “a core task of the Republic is to organise plurality, not only of individuals but also of

communities” (1998:24). As such, the “public community” should guarantee structural conditions for the development and expansion of all cultural communities.

Supporters of this position do see the need to set limits on cultural recognition, however. For example, according to Daniel Weinstock (1999), there is a risk such recognition will lead to an increasingly fragmented political community where claims for specific treatment become the norm rather than the exception. It is quite difficult to set criteria according to which special group rights could be accorded to a minority, and even harder to determine who could be recognised as a minority. Moreover, collective identity remains a subjective reality and to impose a definition, or a categorisation, of citizens according to their supposed allegiance to a group could have dramatic consequences, especially if these cultural attributes are used to set exclusionary regime or to limit access to citizenship rights rather than enhance it. The example of the ex-Yugoslavia is the one most people point to here, but it is certainly not alone.

Citizenship and the recognition of cultural diversity: The Canadian experience

Canada has been, for obvious reason, at the forefront of the debates on the cultural challenge to citizenship. Not only are some of the leading scholars in the field Canadians, but Canada is also to a certain extent a laboratory in terms of policy development in response to those challenges. There are two areas in which innovation is currently occurring, and in which controversy is therefore concentrated. The first is the area of multiculturalism policy. Since 1971, the Government of Canada has officially promoted a policy of multiculturalism, which has come to be based on a view similar in many ways to Kymlicka's. It stresses the positive value of cultural diversity in a liberal society, and therefore describes Canada in terms of a “diversity model”.

This is an important departure from classic liberal thought, represented by the “French model”, for example. As opposed to the communitarian idea, however, Canadian multiculturalism policies do not envisage a society structured along lines of culture. Thus, to the extent that cultural rights exist, they are intended to enhance individuals' freedom to choose to live according to his or her own cultural heritage (Kallen, 1982: 53). The

cultural rights associated with multiculturalism are thus attributed to individuals, not the group. As such, the policy mostly focuses on sustaining cultural organisations that can help individuals in their attempt to participate in the social, economic and political life of the country. It also promotes tolerance, funding anti-racist activities as well as programs enhancing greater access to public institutions for individual members of minority groups.

This attempt to recognise the cultural dimension of participation and access to citizenship rights is not without its critics, however. Multiculturalism has been criticised for fostering ethnic separation, enclavement and folklorisation of cultural attributes (Bissoondath, 1994). Other critics, inspired by communitarians, argue that limiting culture to a matter of individual choice, it privatises diversity and ignores its collective dimensions. Multicultural policy affords minorities cultural legitimacy so that “in private, they can sing their ethnic song, dance their ethnic dances and eat their ethnic food, but it does not provides minorities with support for *structural* pluralism - for educational, religious, language institutions - through which a living cultural community can survive and be revitalised.” (Kallen, 1982: 56). Thus, for these commentators, far from solving the problem of access to citizenship, multiculturalism may in fact result in the opposite.

A second area in which Canadian policy has faced the diversity challenge occurred is by introducing a certain amount of recognition of national minorities into the citizenship regime. These actions are redefining the boundaries of citizenship in Canada by opening space for some autonomy and some asymmetry in the citizenship regime. The most movement has been with respect to Aboriginal peoples, who are seeking recognition (and were in fact granted in the 1982 Constitution Act and in subsequent interpretations of Section 25 by the Supreme Court) of certain privileges and rights not available to other Canadian citizens, on the basis of their standing as peoples. These rights have been translated in political terms into self-government arrangements that allow Aboriginal nations to exercise a limited sovereignty over a certain territory. The objective is to create institutional arrangements that will ensure the cultural and social development of Aboriginal communities. This is a formal recognition that forced integration or

assimilation, in order to achieve homogeneity, is not necessarily the way to ensure social cohesion and participation in a diverse society.

As revealed by the controversy surrounding the agreement negotiated with the Nisga'a of British Columbia, formal recognition of asymmetrical citizenship can bring its share of conflict, however. Only the members of the Nisga'a nation will benefit from the rights associated with what is explicitly called "Nisga'a citizenship", including the right to vote in the assembly and elect representatives. This means that non-Nisga'a living within the territory administered by this First Nation will not have a right to vote on issues that directly affect them.

Critics have denounced the arrangement as "racist", because it defines the borders of belonging according to group membership.¹⁸ It is, indeed, a departure from the liberal principle of universal - and supposedly neutral - equality. However, it is an arrangement which has been developed to address a lingering and festering real problem in the previous citizenship regime. Faced with the unacceptable social, economic and other consequences of the cultural exclusion of Aboriginal peoples living in Canada, an institutional arrangement based on differentiation appeared to necessary, in order to achieve equality.

One can expect this debate on asymmetrical citizenship to grow in importance in the near future, given the number of negotiations of self-government arrangements currently in process between federal and provincial governments and Aboriginal nations.

Elsewhere, different types of asymmetrical citizenship are being considered and promoted as the best way to guarantee the full exercise citizenship for national minorities. Discussions about institutional recognition of Basques and Catalans in Spain and Scots in the United Kingdom are some examples. The arguments made are not that different from those about why it is necessary to recognise formally that Quebec is a distinct society.¹⁹ As our constitutional controversies for decades have shown, however, it is not easy to

insert new ways of thinking about cultural diversity and its recognition into citizenship regimes profoundly committed to traditional liberal notions of what constitutes equality.

Therefore, while few people would reject the notion that there is an important cultural dimension to social participation and full integration in a community, there is little agreement about how to achieve it. Cultural, linguistic, ethnic or religious minorities all claim in their own way a better integration in the citizenship regime that would allow them to participate fully in the social, economic and political life of the community without having to submerge their specific identity into the common culture, which is *de facto* the culture of the majority. The challenge for liberal societies is to develop a conception of citizenship as well as institutional mechanisms that allow such recognition without opening what Daniel Weinstock calls the Pandora's box of cultural exceptionalism (1999).

It is now clear however that it is impossible to treat citizenship as "above" cultural distinctions. Not only are groups seeking recognition of their specificity, but multiple communities of belonging (and indeed multiple citizenships) are becoming the rule rather than the exception. All this has important consequences for the definition of rights and responsibilities of citizenship and our understanding of the mechanisms of access, as well as of the conditions for solidarity and belonging. Dealing with diversity not only challenges older definitions of citizenship, but it also transforms its purpose as an organising principle of society. Perhaps the purpose of citizenship might be not only to guarantee equality among members of the community in the Marshallian sense, but also, as Herman van Gunsteren suggests, to enable people with multiple identities to organise their own plurality (1998: 15).

The challenge of locating citizenship

If historically the invention of citizenship in western political thought involved the invention of the autonomous individual, it also required the invention of a new space in which individuals could associate. The modern national state, heir to a multitude of

earlier political forms (Tilly, 1991), had by the 19th century become the location in which citizens exercised their rights and responsibilities, gained access to political institutions, and in exchange formed bonds of common national identity. The “international” and “subnational” were spaces that could not adequately guarantee full citizenship.

Nonetheless, this picture of a single historical trajectory requires some nuancing according to institutional variation. For example, in federations, responsibility for all three dimensions of citizenship is constitutionally shared and, therefore, may vary according to institutional arrangements... and conflicts over them.

Indeed, as Canadians experienced it, the creation of a pan-Canadian citizenship regime after World War Two asked them to weaken their regional loyalties. As Paul Martin, Senior said when he presented the new Citizenship Act to the House of Commons in 1947:

It is not good enough to be a good “bluenose” or a good Ontarian or a good Albertan. Sectional differences and sectional interests must be overcome if we are to do our best for Canada. The only way this can be done is through encouragement of the feeling of legitimate Canadianism...

(Paul Martin quoting himself from 1946, in Martin, 1993: 73)

In exchange, Canadians would be able to participate in a set of new economic and social institutions that expressed the bonds shared from “sea to sea”. Nonetheless, the actual provision of citizenship rights and access, as well as the feelings of belonging continued to vary substantially across jurisdictions, with intergovernmental relations being a frequent site of controversy and conflict resolution.

A growing body of literature argues that the social bond of citizenship is being challenged as a consequence of globalisation. Sovereignty is said to be increasingly fragmented and divided. As a result, as David Held suggests, one can wonder: “to what political entity does the democratic citizen belong? Everywhere the sovereignty of the nation state itself –the entity to which the language of citizenship refers, and within

which the claims of citizenship, community and participation are made – is being eroded and challenged.” (1991: 24)

Not surprisingly, then, in the era of globalisation as national sovereignty is handed up to supranational entities or increasingly shared with sub-national units, the location for achieving full citizenship has again become an issue. Because the idea of modern citizenship is based on a relationship between the sovereign individual and the sovereign state, changes in the role of state institutions in the global order will undoubtedly affect citizenship practices.

Three arguments are commonly made about such processes. One sees a set of threats coming from groups seeking solidarity and a voice of their own in the global arena. Actors who move beyond the traditional borders of citizenship to seek recognition and standing in international and transnational agencies and institutions are often challenging existing citizenship regimes (Jenson and Papillon, 2000).²⁰ Such action also occurs in a context of increasingly constraining international norms and institutions, as global markets are regulated and political institutions, intergovernmental and other, gain new authority. This is a second challenge to the traditional practice of locating citizenship in the national states, and along with the first leads some observers to focus on the supra-national level as the location in which rights, access and belonging will be defined. These commentators are sometimes supported and sometimes criticised by those who see a third challenge (often linked to the first two, to be sure). This involves the decomposition of the national into its component parts, as regions and even global cities gain more capacity to regulate the citizenship of their denizens.

All three arguments share an assumption that the legitimacy of the national state as the site for the exercise of popular sovereignty is being lessened. As political struggles and debates that previously took place within state institutions are increasingly played out at transnational or subnational levels, national polities may well become less relevant, or less central to democratic practices as well as for feelings of belonging and the distribution of rights.

In the face of such uncertainty, some authors suggest the decline of the national state will result in a medieval-like order of overlapping sovereignties and jurisdictions, with all the instabilities and potential conflicts over resources associated with the pre-modern times (for example, Bull, 1977: 254). Others, looking at the current process of institutionalisation in international politics, see the superimposition of a transnational order on national sovereignties, with a form of global democratic citizenship emerging as a legitimating force for a world government (for example, Rosenau, 1998). Given the uncertainty about the direction of change, one promising stance involves treating globalisation as a multidimensional process, involving a plurality of globalisations, and as processes which best described as the globalisation of the local and the localisation of the global (Santos, 2000). Such a perspective has the advantage of problematising the direction of change, rather than assuming it, as far too many authors have tended to do.

Challenges from Above: Transnational Citizenship?

A growing number of political and social issues of direct relevance for citizenship have global dimensions. The creation of new institutions, structures and norms at the international level suggest that the borders of national sovereignties can not encapsulate such issues. However, many of the institutions remain *international* organisations, and they often lack political space for non-state actors and for democratic practices. For example, even the European Union, which is one of the most developed of such institutions and which has created routes to representation for citizens (in the European Parliament and European Court of Justice, for example) as well as for states still suffers from an acknowledged “democratic deficit”. Where space does exist, it is often for non-governmental organisations acting in an uneasy sometimes alliance and sometimes conflict with governmental actors. The experience of environmental and women’s summits organised by the United Nations provides an example of this kind of “adjustable” presence.

Faced with the closed doors of traditional international organisations, solidarity networks and other organisations have proliferated, as the mobilisation against the Multilateral

Agreement on Investment (MAI) negotiated “behind closed doors” according to some²¹ and the opposition to the World Trade Organisation (WTO) negotiations in Seattle and Washington, DC indicate. Such movements are claiming the right to have access to crucial political processes that are taking place out of reach of the democratic structures of the national state. They are seeking to democratise international politics, a realm which has always belonged to the “sovereign” and been most distant from democratic and other controls (even as the conflict between the Prime Minister and Conrad Black reminds us). They are also seeking to realise the potential of international judicial regulation, again an area long overdetermined by national sovereignty. Increasingly, as we have seen, international courts can exercise authority, but the process remains slow. Similarly, they enforce international agreements, whether on the environment, human rights or gender equality, although they never match the hopes of their promoters.

As a result, there is an growing body of literature exploring the possibilities of transnational citizenship emerging as a response to globalisation (for example, Held, 1998; Rosenau, 1998; Balibar, 1998). As Brian Turner notes: “we have a system of national citizenship in a social context which requires a new theory of internationalism and universalistic citizenship” (1986: 140).

Concrete analysis about this process of transcending state sovereignty can be found in the literature about the international human rights regime. The United Nations and the European systems of human rights protection are said to be the embryo of a global citizenship based not on nationhood but on personhood. One of the earliest to make this connection, Yasemen Soysal (1994) describes a post-national regime of rights that is taking precedence over the state-based citizenship model. It is not membership in the national state that ensures the exercise of human rights but rather the status of person (individual) member of the world community of human beings.²²

While Soysal focussed on the European situation, it is interesting to note how Canada has followed a similar trajectory. Many rights are guaranteed to anyone on Canadian soil; citizenship is not a condition for their exercise. Foreigners legally resident in Canada

have had the right to social citizenship for a long time. As early as 1949, for example, parents resident in Canada for a year were eligible to receive the Family Allowance, one of the first universal programmes of social citizenship. Then, the Supreme Court confirmed in 1989 that the Charter applies equally to citizens, permanent residents and non-Canadians temporarily on Canadian soil.²³ As a committee of the Senate studying citizenship mused, perhaps Canadian citizenship as a particular status had been reduced to the right to vote and hold a Canadian passport (Senate, 1993).

The Senate Committee's remarks help us to understand the limits to the thesis of transnational citizenship. First, human rights and citizenship should not be confused with each other. Human rights are moral standards that are in the process of becoming universal norms. Citizenship rights include basic human rights (the civil rights identified by T.H. Marshall), but citizenship goes beyond such rights. It is part of a larger compact between an institution (the state) and its constituents (the citizens). As we have seen above, this compact cannot be fully realised without mechanisms of access and expressions of belonging. Indeed, given the crucial historic link and the long-standing bargains among social forces that built an exchange of support for the state in return for participation in government, the absence of democratic control over transnational politics makes discussions of "global citizenship" ring hollow indeed.

It is also worth noting that many who announce the emergence of transnational citizenship build their claim on the behaviour of social movements that are active across national borders. They see such action as evidence of an emerging global democratic order. While there is some merit to the argument that such actions are creating novel politics, it is worth noting that studies of social movements have not all confirmed such a far-reaching conclusion. Many movements use transnational networks not to create a new global order but rather to accumulate resources to challenge their opponents (often their state) in national spaces. In fact, some of those claims are direct challenges to the national citizenship regime, seeking not to replace it with a transnational regime but rather to transform it and gain access to its institutions.²⁴ It is not the location of citizenship that is

at stake, but rather the *practices* associated with citizenship claims and access strategies that are changing.

There are situations, of course, in which supranational institutions are much stronger and do exercise considerable authority. The EU is the classic example, with many describing it as a unique political form that will be able to realise the promise of the Treaty of Amsterdam and provide a European citizenship (for example, Preuss, 1999; Closa, 1992). The Treaty states that “every person holding nationality of a Member State shall be a citizen of the Union”.²⁵ There are a number of rights associated with European citizenship²⁶ and institutional mechanisms, such as the European Parliament and Court, are developing. The European Commission also promotes European identity to increase the sense of belonging to the institutions of the Union among its citizens (Wiener, 1997: 540).

Nonetheless, the continuing democratic deficit, as well as the complementary nature of European citizenship²⁷, reveals that even this bold experiment has not delivered a complete “supranational citizenship”. According to Andrew Linklater, for example, the EU Treaty establishes a “thin” citizenship “which is more appropriate to the development of an international civil society than for a transnational political community” (1998: 130). European citizenship remains a creation of sovereign states, and as such has the characteristics of a “second-tier” citizenship. As Wiener argues, the most striking difference between Union and national citizenship is that the belonging dimension of EU citizenship remains weak; European identity is still far from replacing the various national identities (1997: 548).²⁸

The European case is a good example however of the new, more complex and diffused reality of citizenship in an increasingly integrated world. If it is still too early to predict whether a form of postnational or transnational citizenship will eventually emerge, it is obvious that the boundaries of what used to be national citizenship are changing. The question remain however as to how this new distribution of the attributes of citizenship will play out. Will state-centred citizenship disappear or might a multi-layered citizenship

model, based on the European model where the primary allegiance still lies with the national community, eventually be generalised?

Challenges from below: subnational citizenship?

One consequence, some authors argue, of the weakening of the national state associated with globalisation has been the resurgence of local or subnational communities as a site of struggles for power as well as democratic expression and solidarity. A growing body of literature argues that such communities are increasingly becoming the basis for citizenship claims (Archibugi, Held and Köhler, 1998; Magnusson, 1996). These authors suggest that processes of globalisation and localisation of citizenship are occurring simultaneously.

The first and most straightforward argument made to support this thesis is that cities, states or provinces, and regions are increasingly involved in transnational politics. In a global market economy, competition for investments and new markets is global. To act in them, regional, provincial and municipal governments are developing their own capacities or expertise, and included in their toolbox are various kinds of new relationships with economic actors and other political institutions.

Local politics extends its reach, and key decisions regarding citizens' interests are made at the local level, while communities develop solidarity with other communities that often transcends national borders. European regions, as provinces and states in North America, for example, now conduct intergovernmental relations traversing the borders of their country. Regional economies develop synergies which do not respect the borders of national sovereignty, and have consequences in the kinds of rights of mobility and social programmes that are developed.

For example, the mobility rights guaranteed by European Union treaties are meant to serve the needs of contiguous transnational regions for exchanging expertise as much, if not more, than they are meant to serve the needs of national units. Similarly, the impetus for many terms of the Free Trade Agreement and then NAFTA arose from the interests of

geographically contiguous regions, states and provinces in fostering, controlling, and shaping the rights to employment, contracts and so on (the basic civil rights of citizenship identified by Marshall).

These processes are even more complicated in a federation, in which state sovereignty is shared. In Canada, for example, given the constitutional division of powers, many of the social rights of citizenship as well as civil rights are the responsibility of provincial governments. The result is that rights as well as access can vary, at times significantly, from one jurisdiction to another. Moreover, activity at one level of government may promote rights and access in ways that are not accepted by the other level. In addition, as we noted in the introduction to this section, regional (frequently provincial) identities may compete with national feelings of belonging. Indeed, whether they compete with or reinforce each other has been a major political issues for decades.

Therefore, changes in political economy as well as constitutional politics mean that the borders of belonging to the political community may already be shifting from the national state to local or regional entities. They may be becoming more relevant to the daily life of individuals and to the expression of collective identities. As we have argued, the three dimensions of citizenship are mutually constitutive. If some access and some rights are shifting to more local communities - as for example, national standards shape provincial social programme provision less - chances are the solidarity and sense of belonging associated with citizenship and essential to the legitimacy of democratic institutions will follow.²⁹ Indeed, the resurgence of regional or provincial identities, often associated with downloading of responsibilities as well as disenchantment over the central government, is a reality in many countries, including the Canadian federation. News about movements for autonomy or separation in one province or region is increasingly frequent.³⁰

Sites of citizenship?

The final issue for the “location debate” involves the question of the “site of citizenship” as a horizontal, rather than vertical matter. Further weakening of the state “from within” is associated with decentralisation and delegation of programmes and service delivery.

Although the consequences of economic restructuring on the social dimension of citizenship will be detailed in the next section, it is worth noting its impact on the ‘sites’ of citizenship practices.

In response to pressures to reduce the size of the state as well as to increase the private sector’s flexibility for responding to global competition, structures associated with the welfare state and other public services have been “trimmed-down”. This has involved elimination of services, privatisation of delivery, decentralisation of design to subnational units or increased reliance on partnerships with the private and voluntary sector. Municipalities, local governments and non-profit private organisations are becoming central actors not simply in service delivery but also in the definition of access to those services. In this way, they are taking on some of the responsibilities that previously belonged to state actors, such as public servants, and to democratically determined forms, such as rules and regulations.

Moreover, because these arrangements often involve partnerships of various kinds, there is a blurring of the boundary between those who speak as representatives of the public interest and those who speak for other interests. On the one hand, private-sector organisations have clear responsibilities, to their Boards of Directors and shareholders, which are not identical to those of the wider public interest, expressed through public institutions. On the other hand, because they are actively engaged in partnerships, such private sector actors may also make some claims, based on experience and knowledge, to know the public interest.

Governing by partnership raises significant citizenship issues. Given that social rights as well as access to them and their design (via democratic institutions) are core dimensions of citizenship, we might wonder about the consequences of such changes. There are obviously issues of accountability, as non-state partners take responsibility for designing and managing public programs. In removing the administration of programs from direct public scrutiny, governments may also be losing legitimacy in their capacity to articulate

the common interest of the community and by the same token, are weakening the democratic process associated with the definition of those programs.

The capacity of citizens to exercise their democratic rights may have been reduced dramatically in this “delocalisation” process. In addition to issues of democratic access, this transformation again affects public services’ legitimacy as expressions of collective solidarity. Focusing on service delivery by partnership or by privatisation, even when publicly funded, begin to transform citizens’ expectations about social programs, making them less the expression of social citizenship and more simply consumption goods, like any other.

Many of the issues raised in the location debate are linked to the third challenge that we have identified in the literature on citizenship, that of the status of social rights and support for the disadvantaged.

The challenge of social citizenship

Historically, the notion of citizenship was closely associated with the individualisation of society, and elimination of traditional ties of obligation, derivative for the most part of feudal and patrimonial representations of social relations. Nonetheless, this individualisation has never meant that theories of citizenship could not understand the importance of social ties and cohesion. The French revolutionaries, for example, clearly sought to rework traditional ties of social solidarity into modern ones, by giving fraternity the same standing as liberty as equality. By fraternity they meant what we call solidarity (Bernard, 1999: 49). They were concerned to identify the existence of social bonds and to signal the need for their sustenance.

Because citizenship has so long been imbued with notions of solidarity, it was not surprising that T.H. Marshall (and James McCaig, as we saw above) identified in the politics of the inter-war and immediate post-war years, the emergence of a new set of rights – social ones (1964: 86ff; 105ff.). Whereas in the 19th century, during the heyday

of classical liberalism and its nightwatchman state, “dependency” had brought a loss of citizenship, by the 20th century access to certain public supports in time of need was a citizenship right and recognition of belonging.

The treatment of poverty exemplifies this shift. Under the Poor Laws, individuals in receipt of relief were excluded from citizenship:

The Poor Law treated the claims of the poor, not as an integral part of the rights of the citizen, but as an alternative to them – as claims which could be met only if the claimants ceased to be citizens in any true sense of the word. For paupers forfeited in practice the civil right of personal liberty, by internment in the workhouse, and they forfeited by law any political rights they might possess (Marshall, 1964: 88).

Even the early English Factory Acts (Marshall, 1964: 88-89), protective legislation in France and US Supreme Court decisions permitting “restraint of trade” in order to protect the health and safety of workers applied only to non-citizens, that is women and children. Adult males, the “citizen *par excellence*” in Marshall’s language, were not covered by these early health and safety measures, precisely because to be a full citizen still required the capacity to be self-supporting and fully responsible.

A first break in this pattern came with public education, interestingly enough provided usually for both girls and boys, even though adult women still lacked full citizenship. Public education obviously met many goals simultaneously but one could be described, as it was by Marshall (1964: 90), as the adult’s right to be educated when a child. There was also a dose of citizen responsibility; schooling was compulsory and removed parental “choice” whether for moral or economic reasons about whether to send the child to school. In some countries the citizenship content was front and centre, as it was in France, for example. For the proponents of the *loi Ferry*, the public school and the school master or mistress were the republican bulwark against the influence of the Church and were the Republic’s guarantee of its future.

With the expansion of social programmes in conjunction with the broadening of political rights to new groups (the working class and women), a major shift occurred in notions of economic autonomy. Mobilisation by social reformers, Social Democrats, the organised working class, promoters of positive liberalism, Christian Democrats and so on all gradually transformed “poor relief” into “income security”, the “dole” into “social programmes” and charity (both public and private) into the welfare state. The individual no longer had to be economically autonomous in order to participate politically (with the elimination of property restrictions and the Poor Laws) or to enjoy full civil rights. By 1945 women in most countries had finally gained the vote, although it did take until the mid to late 1960s before married women enjoyed full civil rights with respect to contracts and many financial matters.

This move to create social rights of citizenship marked a major change in thinking about public finances. As we have noted above, enlargement of citizenship was historically constructed over time out of a more or less explicit exchange relationship. The sovereign could tax his subjects, but in exchange those subjects gained political rights and the power of the sovereign was thereby constrained. By the 18th century – recall the two great Revolutions of the end of that century and their emphasis on taxation – the link between representation and taxation had been clearly made in political discourse. But taxation for what?

It took until the late 19th and early 20th century for the notion that the state had some responsibility for alleviating the ordinary and extra-ordinary risks of life to be more widely accepted. The use of public funds for what we think of social spending required a further transformation, one which transmuted longstanding private commitments within religious and other communities to voluntary taxation – that is to tithing – into an acceptance of public spending for social purposes.

The institutions of the judeo-Christian tradition had always committed themselves to some responsibility for the poor, in their own communities and beyond. Therefore, social

reformers, many coming from faith communities and with ideas about the social gospel, social Catholicism and so on, contributed to this transmutation. In order to avoid the stigmatisation, the moral overlay and the general “hit-and-miss” nature of charity, public provision and state spending came to be identified as a better way to disperse the tithe, or tax, from the richer to the poorer and certainly the weaker.

Of course, there was another route to the notion that the state should use its resources on social spending. A range of additional arguments came from social democracy and other left formations, which had strong views about public spending and taxation. In their case, the state was the proper institution to offset the power of capital and to alleviate the social costs of living in capitalist societies. The basis of the claim was to deploy democratic power in politics to counterbalance the economic power of capitalists in markets and elsewhere. Through public institutions citizens could make choices and impose them in the economic realm, as well as on themselves and their fellow citizens.

The various traditions of self-taxing of faith communities became important allies of the social democratic forces in some countries and an autonomous source of support for public spending in others. The existence of the one route by alliance (which is where we might locate Canada with the social gospel roots of the NDP and left liberalism, the British Labour tradition and Swedish social democracy) and another arising directly out of a reforming religious tradition (which we might see in the social Catholic roots of Quebec’s Quiet Revolution, and Germany and many other European countries’ Christian Democracy), meant that post-war citizenship was deeply imbued with a vision of social rights of citizenship, and the legitimacy of using public monies to achieve social ends.

Indeed, we might read the longstanding disputes in Canadian inter-governmental relations over the “spending power” and tax points – controversies that have been constant since the mid-1940s – as a reflection of the importance of these issues, as well as differing interpretations about citizenship and rights. Governments then, as now and in all intervening decades, have understood that the way they spend their taxes expresses the

content of their particular societal projects, their understanding of citizenship and the role of the state (Bourque et Duchastel, 1996 review these debates in detail)

Social citizenship, within the mixed economies of the post-war years, generated rising expenditures on education, health, children and the poor.³¹ People often made explicit links to citizenship, as Canada's Liberal government did at the post-war Reconstruction Conference, where social welfare was described as making "... a vital contribution to our concept of Canadian citizenship and to the forging of lasting bonds of Canadian unity" (quoted in Cameron, 1997: 4).

Eventually, the justice of such spending was widely accepted, and through the 1960s and 1970s new expressions of social citizenship were devised. In Canada, for example, these years saw bodies like Secretary of State take on a large agenda, in which social and political equality were linked (Pal, 1993; Jenson and Phillips, 1997). This said, of course, there is never complete consensus on these matters, any more than we have seen in the other large debates. By the late 1970s, a debate had broken out within and across two political traditions, those of the right and the left.

Social citizenship – the critique from the right

For politicians and political forces on the right of the political spectrum, the consequences of too much investment and spending on social citizenship had become very obvious by these years. One was ballooning expenditures, described as "out-of-control" and threatening to sabotage future economic growth. As the contours of globalisation became clearer, threats to competitiveness were often evoked as the downside of high levels of state spending or costly social programmes, whether financed by public spending or employers' contributions. Therefore, throughout these years in most European and North American countries there was a critique of social spending as a threat to economic well-being. There is no need to delve deeply into these opinions; they have become familiar.

Such arguments, while much debated and no doubt having much empirical validity, would not have had the moral and political force they came to enjoy, if were not for the fact that some political forces on the Right linked the spending debate to far-reaching criticism of the organisation of citizenship. In what came to be called variously the New Right, neo-conservatism, and neo-liberalism, post-war citizenship was faulted for being too “passive”.³² Citizens’ lack of engagement was both economic and political. While we will explore the second in more detail in the next section, criticisms of the economic consequences of “passivity” gained ground quickly.

The basic notion was that social citizenship – often described as “entitlements” – encouraged citizens to take but not give, to disengage from the labour force, and to be willing to live in the semi-poverty of social assistance. This construction of the negative effects and unintended consequences of social spending led to a clear political conclusion for right-wing politicians and parties. It would be necessary to reintroduce the responsibility dimension of citizenship, in particular by developing incentives for individuals to take responsibility for themselves and their families.

The policy package became a mixture of sticks and carrots. On the first side were policies seeking to reduce dependency, by removing those who “could be” working from social assistance. Gradually over time the list expanded from the “welfare bums” to include virtually all able-bodied individuals and to force those still on welfare to work for their benefits. Compulsory and punitive workfare was one manifestation of this position. On the side of the carrots were some workfare programmes which coupled the requirement to work with a range of supports to enable people to do so, with training, childcare and transportation being on most lists.

Another important element of the carrot side, and one which interfaced easily with the thinking about workfare, was the notion that people had to have sufficient resources to be responsible citizens. Therefore, they needed to retain a larger portion of their income; they ought not to “spend” so much on taxes. Such thinking provoked a range of political arguments about the costs of taxation, which went far beyond the concerns of economic

competitiveness. Too high taxes were cast as hindrances to competitiveness and individual liberty, to be sure. But they had also begun, from this point of view, to interfere with citizens' capacity to exercise their responsibilities of citizenship, that is to be independent, autonomous, and self-reliant.

Such thinking has resulted in a substantial narrowing of the terms of citizenship for some. It has been reduced to the civil and political rights identified by Marshall and the liberty and political equality identified by the French revolutionaries. Moreover, markets rather than collective choices exercised through political institutions, have been identified as the locale most appropriate for the exercise of consumer sovereignty. This has been described as the liberal paradigm of citizenship, which finds public good in private decisions, particularly those organised by markets (Snellen, 2000: 1). We would be hardly surprised, then, to find that this position has not been adopted by everyone.

Improving social citizenship – the view from the left

To say that the right's vision of social solidarity and the place of politics has not generated consensus, does not mean that the alternatives currently proposed as alternatives are simply a call for a return to the past. As we will see below, up-dating has been going on among progressive forces as well. Before examining these discussions, however, it is worth summarising the way that many in Canada read the post-war expression and institutionalisation of social citizenship.

Throughout the years of the Second World War, the Liberal government promised a future of peace with security and a new social contract. This was eventually expressed as a pan-Canadian social contract between individual citizens and the government in Ottawa (Bourque and Duchastel, 1996: 83; Senate, 1993). As the 1943 Throne Speech put it: "a comprehensive national scheme of social insurance should be worked out which will constitute a charter of social security for the whole of Canada." (quoted in Cameron, 1997: 3). The recovery of this history in the 1980s, as the post-war social contract was being remade via trade agreements and reduced government spending, resulted in renewed attention to social policy as a dimension of citizenship and battles to preserve

the programmes that represented it. As a result, decentralisation of the state and its withdrawal from political and economic regulation, described in the previous section, could increasingly be represented as an assault against the basic values of Canadian citizenship (for example, Morris and Changfoot, 1996).

In this sense, the situation in Canada is the obverse of that in the United Kingdom and the United States. Despite the fact that it was a British sociologist, T.H. Marshall, who announced the arrival of the social rights of citizenship, the welfare state was rarely framed in such terms in the UK. Therefore, the terrain remained open for the Conservative government to lay claim to the citizenship discourse, and propose a *Citizen's Charter* in 1991. It put the emphasis on service delivery and accountability, rather than programme content. In Canada, in contrast, from the 1940s on, the substance of Canadian citizenship was presented in social as well as political terms. This has meant that proposals to change social programmes have always had to carry a heavy baggage of other values, as has been seen in the last 15 years in debates about medicare and about free trade.

Embrace and enthusiasm for post-war social programmes had not always been the stance of the left, of course. Well before the New Right began to take on the post-war welfare state, left criticisms of its limits and its nefarious effects were in wide circulation (of the many, see for example, Marcuse, 1968; Panitch, 1977).³³ Most frequently faulted were the disempowering effects of dependency and the consumerist society which undermined sociability and engagement. The bureaucratic welfare state was already accused of transforming citizens into clients, who no longer participated politically or otherwise.³⁴ There was already a call to couple strategies for empowerment with strategies for income security (Bélanger and Lévesque, 1992). The most forward-looking of these visions generated policies of community development of various sorts and levels of radicalism. The government of Canada participated, with the Local Initiatives Programs of the early 1970s, for example.

Such criticisms of the hierarchical and bureaucratic welfare states never disappeared, even when lefts had to turn their hand to defending rather than improving welfare states, in the face of the political assaults of the New Right. This has led to a series of initiatives described variously as lowering the “welfare wall”, “supply-side labour market policy”, and “moving children off welfare”. In all of them, the goal is to manage the interface between market participation and market failure. They involve, for example, analyses of the restructuring of labour markets which are shedding workers, and therefore creating the need constantly to invest in training and retraining, including life-long learning if citizens are to be able to participate (for example, Martin and Ross, 1999). Others focus on the mounting needs for services, needs left unmet by current markets; they seek to provide resources to communities and associations so that they will be able to begin to address such needs.

While such thinking might be read simply as social or economic policy redesign (which it is) it is interesting to note that it is increasingly phrased in citizenship terms in a range of countries. There is a return to the language of solidarity and of equality. For example, Tony Blair, writing of his vision of citizenship in *New Britain: My vision of a young country* (1996), said:

People are not separate economic actors competing in the marketplace of life. They are citizens of a community. We are social beings. We develop the moral power of personal responsibility for ourselves and each other... People are not just competitive; they are co-operative too. They are not interested in the welfare of themselves; they are interested in the well-being of others. (quoted in Pollitt, 2000: 2).

If the Right can be described using a definition of citizenship narrowed to political participation and freedom, this centre-left can be described as treating citizenship as a phenomenon of “the *social* sphere – civil society – rather than the *political* sphere – the state and membership of a specifically *political* community.” (Pollitt, 2000: 2). A variety of authors, coming from different political horizons, agree that the core of the Blairist project is equality of opportunity, responsibility and “true community” (see the references

in Lewis, 1999: 63, who also makes the links to the British liberal tradition, including Beveridge).

Such new attention to citizenship elsewhere has led to a number of initiatives touching directly on its social dimensions. For example, following the efforts in the early 1990s to insert a social charter of rights into the Canadian Constitution during the debate preceding Charlottetown, anti-poverty and other advocates have pursued strategies through the courts seeking better recognition of social rights in the foundational documents. Here the emphasis is on using political institutions to achieve social citizenship.

Another direction of action has brought in several countries a resurgence of language of democracy, linked to the economy as much as to politics, via the concept of the social economy. In France, Belgium and Canada (although primarily only in Quebec), the notion of the social economy has been developed to carve a new space for interaction of state and societal actors, including the major economic ones (Lévesque and Mendell, 1999). Proponents of the development of this sector see it as a place in which the excluded can be brought back into society by providing them with the wherewithal not only to engage in the market economy but also in politics. All of this has led to efforts to reanimate community life at the local level in poor and disadvantaged neighbourhoods (Helly 1999: 37 [efforts in France]; 41 [in the US]; the literature on community development in Canada is immense).

There is, indeed, increasing recognition that economic exclusion and poverty hinder access to the full rights of citizenship. From something as straightforward as the need to have a fixed address in order to vote, the broader consequences of exclusion for citizenship have been elaborated in many places. The creation of the category, involving economic, social, health and familial dimensions, has been studied by several authors (see Thomas, 1997; Castel, 1995; Helly, 1999: 36ff. for a summary). The intersections with citizenship can be seen in this quotation from a French government report in 1987:

Il existe un lien d'interdépendance entre les droits économiques, sociaux et culturels et les libertés civiles et politiques. Faute d'une sécurité minimum dans les domaines fondamentaux de l'existence, une partie de la population française ne peut disposer des moyens d'insertion sociale, notamment par une participation associative. Faute d'une domicile reconnu, un citoyen ne peut obtenir sa carte d'électeur. Illettré il ne peut pas prendre connaissance des programmes politiques. (quoted in Helly, 1999 : 37).

In a recent publication Paul Bernard (1999) makes a similar argument, going beyond the category of the excluded to describe the inevitable interconnections among all three classic values of citizenship, and therefore links across policy domains.

The challenge of participation

As has been clear throughout this paper, democratic institutions and practices are a basic component of modern citizenship. The right to vote and to stand for office marks the shift from subject to citizen. The responsibility of citizens to participate in public affairs has an even longer pedigree. As David Held (1993: 17) writes:

In Renaissance republicanism, as well as in Greek democratic thought, a citizen was someone who participated in 'giving judgement and holding office'. Citizenship meant participation in public affairs.... The limited scope in contemporary politics for the active involvement of citizens would have been regarded as most undemocratic.

Several issues in this statement touch directly on the dimensions of citizenship, and will be elaborated below. The first relates to rights and responsibilities. While the formal right to vote and stand for office has been universally available for decades, the reality of that right and access to participation remains an issue. Second, there is the issue of civic duties, and the extent to which a good citizen must participate in civic, and particularly in political, life, and therefore the need to educate them to do so. The question of content of

citizenship education remains highly contested, however. Third, as the quotation also indicates, participation may be less active than democratic theory and theories of citizenship might consider necessary in order to make citizenship a reality. There can be both structural and contextual reasons for a low participation. Therefore, much attention has gone to matters of citizen engagement and approaches to facilitate participation as well as to explanations for low rate of participation in certain areas.³⁵

Between formal rights and real access

The existence of this gap between theory of democracy and actual levels of participation has solicited discussions in both the academic literature and politics about how to assure meaningful access to groups who are hindered from participation for socio-economic or other reasons.

From the beginning of liberal democracy, observers noticed that politics, even after universal suffrage, was dominated by the presence of the better off, the better educated, and men. Therefore, a variety of efforts have been made to expand the net, and include groups whose rates of representation do not match their presence in the population. For example, Canadian electoral law and the regime controlling election expenditures has been, since the 1960s, founded on the notion that the playing field needs levelling if access is to be fair (RCERPF, 1991). Limits on expenditures or on contributions both seek to avoid not only corruption but also a politics open only to those with access to large sums of money, whether their own or their supporters’.

In recent years, attention has turned to mechanisms, both public and private that will increase the presence of women, for example, in elected office. While the major responsibility for promoting the election of women has always been considered to belong to private groups, especially political parties and other organisations, in some jurisdictions it is also treated as a public responsibility, linked to the need to achieve full citizenship.

For example, the RCERPF proposed providing public funds to parties which succeeded in electing a substantial number of their female candidates. This idea has recently resurfaced in France. The French Constitution was amended in July 1999 and the state is now required to foster parity (as many women and men) in all elected offices. One mechanism to be used for doing so is to provide public funds or impose fines on parties that do not respect the principle of parity.

But the French reform goes beyond the use of public funds to promote a certain outcome, as the RCERPF suggested. It mandates equal numbers of women and men in elected office. This constitutional change is the fruit of a long and controversial mobilisation of women across Europe and with the support of the institutions of both the Council of Europe and the European Union. Similar reforms have been promoted in Belgium, Italy and Spain.

With these mobilisations an issue resurfaces. It is: what are the purposes of political representation. Is it to mirror the population or to represent other qualities? If one accepts the notion that fairness requires a substantial presence of all groups, and especially minorities, in parliamentary and other representative bodies, then the issue of democratic representation quickly begins to resemble the controversy around cultural diversity, dealt with above. It is interesting to note that the arguments made by supporters of strict parity (equal numbers of women and men in all elected bodies) structure their arguments in ways that are familiar to those claiming national recognition (in Kymlicka's terms) or "deep diversity" (in Taylor's parlance). Indeed, they are careful to dismiss out of hand any idea that gender is comparable to ethnicity, language or other differences which might lead to claims for recognition. For supporters of gender parity, gender is a "deep diversity" like no other (Jenson, 2000).

The reactions to such claim and their dismissal by not only those defending the neutrality of republican universalism but also those seeking better representation for their group indicates that the fundamental principles of translating rights into real access remains unsettled into the present. It has resurfaced in the debates about the Nisga'a agreement,

and is constantly present in discussions about the proper composition of representative bodies, both elected and non-elected.

Fostering responsible citizenship

There is a certain amount of irony in the fact that women seeking gender parity, or other institutional mechanisms for ensuring their inclusion, do so because they place a high value on active citizen participation in the traditional institutions of liberal democracy, exactly at a time when many others are concerned about increasing disenchantment with democratic politics. Levels of participation remain a controversial issue. While some surveys indicate a decline in levels of trust and confidence toward governments, detailed analysis of the different patterns of participation in civic life are contradictory.³⁶

Those who focus on the decline in participation often do so because they see in the civic community, founded on democratic values and participation, the ties that bind in plural societies (for example Weinstock, 1998; Habermas, 1992). Indeed, in the absence of a shared culture, the values of liberal democracy, including tolerance, respect and activity, carry a heavy load for such analysts (Senate, 1993, for example).

The ways to sustain such commitments to the responsibilities of citizenship are not obvious, however. A few years ago Kymlicka and Norman (1995: 292-300) identified four schools or groupings and their categorisation remains valuable today. These are:

1. Proponents of participatory democracy, who see empowerment as a response to apathy. As we have seen above, this group's concerns overlap those of social citizenship, in that their attention most often goes to those parts of the population disempowered by exclusion. We have seen them, therefore, in the previous section.
2. Adherents of civic republicanism, who see an intrinsic value in political participation. This group has the most difficulty coming to grips with growing expressions of apathy as well as lack of respect for civility and other values of

liberal democracy. They find some explanation in the “perversions” of current political practice (corruption, elitism, manipulation, etc), and therefore can seek a return to more appropriate forms, and certainly improvements on current practices. For example, the calls for reforming campaign financing currently so popular in the US fit here, as does the discourse of PM Lionel Jospin in France on the need to “modernise” French political life. Plans for instituting new forms of civic engagement, such as deliberative dialogue, would also fall into this group.

3. Civil society theorists, some of whom are an offshoot of communitarian thought, seek to strengthen the voluntary organisations of civil society. They see in them the locale for learning the virtues of mutual obligation. A variant of this grouping, a Tocquevillian liberal version, has become very popular since Kymlicka and Norman wrote. It is the social capital approach of Robert Putnam (1993) and others (Weinstock, 1998 for example). They find the roots of well functioning democratic institutions in the private associations which foster trust relations in civil society. At least two unresolved issues remain for this group: what to do with unsavoury forms of associations, which contravene fundamental principles of citizenship (such as the Mafia which is high in trust but low in civic virtue); and which mechanisms work best and are most relevant for translating private association into public virtue (is bowling really as productive of good democracy as parent-teacher associations?).
4. Liberal virtue theorists seek to foster the underlying forms of behaviour which will provide a solid foundation for citizenship. They often stress the importance of education for citizenship, and in particular the teaching of certain values in school. As such, they run into the difficulty of identifying the necessary content of such virtues, without contravening the values of groups in the population which do not share them. In other words, unless the values identified are very “thin”, we are back to the issues raised with respect to cultural diversity.

As the examination of this list, and the brief descriptions associated with make clear, civic virtues, even in the narrow sense of participation of liberal democratic politics according to rules of civility, tolerance of differing views, and respectful of minorities, are not easily achieved. Conflicting values, a normal part of modern pluralist society, render difficult any identification of common values, while practices associated with the technologies of politics may actually undermine them (see Paul Thomas' paper for this project).

Nor is the proper role for public institutions at all clear in this dispute. For some, particularly in the first group, as we have seen, the state is a necessary partner. Similarly, those who put the emphasis on regulation and on citizenship education also see a role for public institutions. But the civil society theorists, in both their communitarian and social capital versions, assign the state the task of guaranteeing individual liberties but grant it less of a role in promoting or guaranteeing the equality and solidarity we associate with citizenship (Helly, 1999: 40-42).

Promoting active engagement

This last issue, promoting active engagement, brings us back, then, to the arrangements which can improve political participation in the institutions of liberal democracy and citizens acceptance of them. Several governments, including the Canadian government, are engaged in a process of transition from a group-based mode of democratic access to an individualistic perspective favouring the individuals as representatives of the democratic order.

Increasingly, from both inside and outside government there is the recognition of the need to improve governance practices and especially accountability as a way of re-engaging citizens and fostering their belief in liberal democracy (for an overview see O'Hara, 1998, chapter 6). Those who promote "civic engagement" may do so for two - perhaps quite different - reasons (O'Hara, 1998: 83-84).

One reason is to foster attachment and commitment, to increase belonging. The other is to redesign the policy process, by seeking input from citizens at a variety of points, that is to change the patterns of access, providing a route to representation via the bureaucracy alongside the traditional institutions of parliamentary democracy. Priority to one goal over the other determines the institutional choices about how and when to engage citizens.

The Framework Agreement on the Social Union (SUFA), for example, provides for mechanisms of citizen engagement, so as to strengthen its legitimacy. The Quebec government's Socio-Economic Summits as recent Youth Summit are also examples of using institutions of engagement to generate solidarity around particular projects. On the other hand governments and departments may also develop initiatives to collect information and to engage citizens in thinking through complex policy options. Thus departments and agencies have been actively promoting certain forms of direct participation through community-level consultation processes or other mechanisms to test different legislative or policy options. The idea behind all such initiatives is to break down the wall of negative perception toward government policy-making process. By involving people in the process, it is assumed that their interest will be stimulated and as a consequence, trust and commitment will increase.

There are some downsides to this new initiative however. First, there is a risk that citizens will find such processes to be a mere exercise of public relations. This is a valid concern since there is no mechanism to guarantee the real impact of these consultations in the decision-making process.

Another concern is with the tendency to replace funding and support for organisations representing various sectors of the society with direct involvement for individual citizens. This individualistic approach, focussing on equality of principle among citizens, is problematic for numerous groups who fear their views and interests are not well represented in political debates. All individuals do not have the same capacity to articulate a coherent position or advise on complex issues. Only groups with expertise

and institutional capacity can rival the public sector in articulating coherent alternatives. Yet, these groups have seen their funding drastically reduced over the last decade and their legitimacy as advocates called into question (Phillips, 1991).

Another policy tool for promoting active engagement is education for citizenship. There is a great surge in interest currently for the notion of citizenship (or civic) education.³⁷ As mentioned above, citizenship education is often associated with the definition of civic virtues and other necessary prerequisites to be an active citizen contributing to the richness of the community. Educators have been concerned with the issue of delimiting the values and practices that should be taught, however. In a pluralist society, it is difficult to determine what is an essential (a minimum standard) value for democratic practice and what is actually a cultural norm.

Citizenship education, moreover, has taken on a whole new perspective following the emergence of issues related to “deep diversity” and the integration of newcomers into the Canadian polity. It is now widely accepted that citizenship education is an essential part of the integration process of immigrants. Again however, it is hard to define the actual content of education programs for immigrants.³⁸ Defining formal criteria regarding the assimilation of citizenship virtues can be highly contingent to the specific views of the government of the time. The question is then what “kind” of citizens we want.

The debates in Quebec on the content of the new curriculum on citizenship education is exemplar in that sense. The controversy lies around the content of history courses and the perspective adopted in these courses. As the Conseil Supérieur de l'Éducation noted in a report to the Quebec Minister of Education in 1998:

“Les efforts de promotion de la citoyenneté québécoise s’inscrivent dans un rapport politique avec le gouvernement fédéral qui déploie ses propres stratégies en vue de promouvoir sa représentation de la citoyenneté.” (1998:5).

As a result, the content of citizenship education programs remains highly contentious. What is supposed to form the prerequisites of participation in democratic debates is now an integral part of this debate.

Nonetheless, citizenship education occupies a growing place as a tool to foster public trust and participation in the polity. The search of an informed and critical citizen, the ideal-type of democratic societies, is seen as a solution to the “dissolution” of civic ties discussed above.

Recent proposals for a new citizenship education suggest that a greater emphasis should be put in the development of specific skills. Critical skills and group skills are examples (CSE, 1999; Sears, 1998). In this perspective, schools would have less say in the content of citizenship, but would be involved in fostering the toolkit of effective citizens.

Some unresolved questions; some suggestions for research

As should be clear from reading these pages, the history and practice of citizenship – being at the centre of the development of our modern polity – have always been full of controversy. Therefore, there are no technical questions to be resolved, no simple list of “unknowns” which could be researched. Nor have Canadians and their governments any clear consensus on where things *are* going, let alone where they *should* be going. Indeed, the field of “citizenship” is most often experienced – at least by these authors – more as a swirling mass of unknowns than as a well-mapped terrain, even at the end of this exercise. Nonetheless, this overview of the challenges to citizenship does lead us to identify a number of areas where research would help to map the situation.

Diversity:

Although the theoretical debate on the various approaches to diversity is rich and lively, few empirical studies have detailed the strategies of governments to adapt their citizenship regime and model of governance to this reality. Comparative analysis of citizenship regimes, keeping in mind the three dimensions of citizenship described in this

paper, could help improve our understanding of various avenues offered to “organise” rather than “manage” diversity. Several questions could inform such studies, for example:

- To what extent does the recognition of cultural specificity of various groups engender fragmentation and political instability. Is belonging weakened, as liberal theory often suggests? Here, it would be very useful to have at least a scan of policies debated and employed in other countries and jurisdictions.
- Does asymmetrical citizenship (differential rights) undermine or strengthen the sense of solidarity and belonging to the broad political community? What are the consequences of such arrangements in terms of democratic practices and full access to rights?
- How are current self-government experiences changing/affecting Aboriginal people’s conception of citizenship? How is it transforming our understanding of governance as a multi-level (and asymmetrical) process? And are federal and provincial governments adapting their practices to take into account Aboriginal governments?
- One response to the challenge offered by national minorities in Canada was to promote and create a strong attachment to Canadian citizenship and promote Canadian identity. To what extent have these policies have been successful? Can identity actually be created by such policies or is it rather a by-product of other policies and their spill-over effects? Can the European experience shed some light on the process of creating identity through policies?

Location:

The changing sites of citizenship practices, both above and below state institutions, raises a series of questions about governance and democratic practices.

- A general question remains as to which, if any, elements of citizenship are being transferred to subnational or transnational political institutions and the impact of such displacement for the capacity of states to generate democratic debates and more broadly to incarnate democratic citizenship. More empirical data, and less assumptions are needed here.

- What are the consequences for the capacity of government to foster solidarity and generate broad collective policy orientations if the sites of citizenship are dispersed? Do federal systems have advantages in this process?
- Is an officially recognised multi-layered citizenship, as experienced in the European Union, a workable response to the need for democratic practices in the global arena? How are governance practices affected by such process? Is the European experience conclusive? Does it include lessons for federations, such as Canada?
- More research needs to be undertaken on the consequences for the constitutive elements of citizenship of the decentralisation and semi-privatisation of policy-making and service delivery. Does this process affect people's sense of common citizenship? The question of legitimacy in the context of decentralisation should also inform further analysis: where is located the legitimate expression of collective solidarity and public interest in this new context?

Social

We need to assess the consequences of shifts in practices of social citizenship on the other dimensions of access and belonging. Are there any consequences to retrenching citizenship to political and civil rights, as it is in the liberal model? For example:

- Is it necessary for the maintenance of a well-functioning society, and therefore a productive economy, that social citizenship receive significant attention? Is some commitment to social equity a condition of successful economies? Here an assessment of comparative case material, accumulating on the links between social and economic policy, and population health would provide some helpful information.
- Do practices of community development that include an empowerment dimension to labour market inclusion re-knit social bonds better than those which focus only on the participation in labour markets?
- Are there any consequences of decentralising responsibility for social policy in citizenship terms? Are feelings of pan-Canadian belonging weakened and interest

- in gaining access to pan-Canadian institutions reduced by the decentralisation of service provision to the provinces and by the increasing use of partnerships?
- Does citizenship education play sufficient attention to the duties of citizenship beyond voting, such as paying taxes?
- Are “brain gain” immigrants attracted and retained because of the social rights of citizenship or do they find the responsibilities, especially in terms of taxes, too onerous?

Participation

We need more information on the role of public and other institutions in fostering civic values and good citizenship practices. We have information about public values and attitudes, some of which is “thin” (being from public opinion surveys) and some of which is more detailed, coming from public dialogues and so on. However, there is much less information about what the interactive consequences of public institutions engaging with citizens really are. For example:

- Do consultations and other dialogues foster support for basic democratic institutions or do they actually exacerbate suspicion because there is no clear policy link and because they exist in an undetermined relationship to policy outcomes?
- What are the consequences of individualising consultation (1-800 policies) for the advice which is received and for the capacity of citizens to have access?
- If good citizenship practices also develop in the private associations of civil society, what can governments do to foster a healthy civil society?
- One solution often suggested to resolve the challenge of diversity is to increase the participation of minorities in the political process. Unresolved issues, however, remain: what kind of participation (individual-collective) and at what level (party politics, parliamentary representation, dialogue, civil service, local government). It could be relevant to undertake a review of various experiences attempted to foster participation of minorities in different countries or at different levels of government.

References

- Balibar, Etienne (1988)
“Propositions on Citizenship”, *Ethics*, no.98, p. 725.
- Beiner, Ronald (1995)
Theorizing Citizenship, Albany, NY: SUNY Press.
- Bendix, Reinhard (1964)
Nation Building and Citizenship (New York : John Wiley).
- Bélanger, Paul R. and Benoît Lévesque (1992)
“Le mouvement populaire et communautaire : de la revendication au partenariat (1963-1992), in Gérard Daigle (ed.), *Le Québec en jeu* (Montreal: Les PUM).
- Bernard, Paul (1999)
“La cohésion sociale : critique dialectique d’un quasi-concept”, *Lien social et Politiques, RIAC*, #41, pp. 47-59.
- Birnbaum, Pierre (1997)
“Citoyenneté et Identité: de T.H. Marshall à Talcott Parsons”, *Citizenship Studies*, vol. 1:1, pp. 133-51.
- Bissoondath, Neil (1994)
Selling Illusions. The Cult of Multiculturalism in Canada (Toronto: Penguin Books).
- Blacklock, Cathy and Jane Jenson (1998)
“Citizenship. Latin American Perspectives”, *Social Politics. International Studies in Gender, State and Society*, vol. 5:2, pp. 127-31.
- Bourque, Gilles and Jules Duchastel (1996)
“Les identités, la fragmentation de la société canadienne et la constitutionnalisation des enjeux politiques”, *International Journal of Canadian Studies*, issue on Citizenship and Rights, 14, fall, pp. 77-94.
- Bull, Hedley (1997)
The Anarchical Society: A Study of Order in World Politics (London : Macmillan).
- Cameron, Barbara (1997)
Rethinking the Social Union. National Identities and Social Citizenship (Ottawa: Canadian Centre for Policy Alternatives).

- CCE (1997) Center for Civic Education.
Education for Democratic Citizenship : A Framework
<http://www.civiced.org/framework.index.html>, 1997
- Castel, Robert (1995)
Les métamorphoses de la question sociale. Une chronique du salariat (Paris: Fayard).
- Closa, Carlos (1993)
 “Citizenship of the Union and Nationality of Member States » in *Common Market Law Review*, vol. 29, pp. 1137-1169.
- Conseil supérieur de l’éducation (Québec) (1998)
Éduquer à la Citoyenneté, Rapport annuel 1997-1998 sur l’état et les besoins de l’éducation, Québec.
- Delanty, Gerard (1997)
 “Models of Citizenship : Defining European Identity and Citizenship” in *Citizenship Studies*, vol.1, no.3, pp. 285-304.
- Dobrowolsky, Alexandra (1999)
 "Of 'Special Interest': Interest, Identity and Feminist Constitutional Activism in Canada", *Canadian Journal of Political Science*XXXI: 4, pp. 1-36.
- Elias, Norbert (1991)
La dynamique de l’Occident (Paris: Calmann-Lévy).
- Gagnon, France, Marie McAndrew, Michel Pagé, (ed) (1994)
Pluralisme, citoyenneté et éducation (Montréal/Paris: L’Harmattan).
- Gagnon, France and Michel Pagé (1999)
Cadre conceptuel d’analyse de la citoyenneté dans les démocraties libérales
 Ottawa: SRA-3666a-f.
- Habermas, Jurgen (1992)
 “Citizenship and National Identity: Some Reflections on the Future of Europe”, *Praxis International*, 12, pp. 1-19.
- Held, David (1991)
 “Between State and Civil Society: Citizenship” in G. Andrews, *Citizenship* (London: Lawrence and Wishart).
- Held, David (1993)
 “Democracy: From City-States to a Cosmopolitan Order?”, in David Held (ed), *Prospects for Democracy. North, South, East, West* (Stanford, CA: Stanford University Press).

- Helly, Denise (1998)
Le débat contemporain sur la mondialisation, la citoyenneté et le pluralisme,
 Report to Multiculturalism Division, Department of Canadian Heritage.
- Helly, Denise (1999)
 “Une injonction : appartenir, participer. Le retour de la cohésion sociale et du bon citoyen”, *Lien social et Politiques, RIAC*, #41, pp. 35-46.
- Isin, Ingin F. (1997)
 “Who is the New Citizen? Toward a Genealogy” ,*Citizenship Studies*, vol.1:1, pp. 115-132.
- Jenson, Jane (1997)
 “Fated to Live in Interesting Times: Canada’s Changing Citizenship Regimes”,
Canadian Journal of Political Science, vol.30:4, pp. 627-44.
- Jenson, Jane (2000)
 "Restructuring Citizenship RegimesThe French and Canadian Women’s Movements in the 1990s", in Jane Jenson and Boaventura de Sousa Santos (eds), *Globalizing Institutions: Case Studies in Social Regulation and Innovation* (Aldershot: Ashgate).
- Jenson, Jane and Martin Papillon (2000)
 “Challenging the Citizenship Regime: The James Bay Cree and Transnational Action”, *Politics and Society*, forthcoming.
- Jenson, Jane and Susan D. Phillips (1996)
 “Regime Shift: New Citizenship Practices in Canada”, *International Journal of Canadian Studies*, issue on Citizenship and Rights, 14, fall, pp. 111-136.
- Juteau, Danielle (1998)
Les enjeux de la citoyenneté : un bilan sociologique, Centre d’études ethniques de l’Université de Montréal.
- Kallen, E. (1982)
 “Multiculturalism : Ideology, Policy and Reality”, *Journal of Canadian Studies*, vol.17:1.
- Keck M. and Sikkink, K. (1998)
Activist Beyond Borders: Advocacy Networks in International Politics (Ithaca: Cornell University Press).
- Kymlicka, Will (1995)
Multicultural Citizenship (New York, Oxford University Press).

Kymlicka, Will (1998)

Finding Our Way : Rethinking Ethnocultural Relations in Canada (Oxford, Oxford University Press).

Kymlicka, Will and Wayne Norman (1995)

“Return of the Citizen: A Survey of Recent Work on Citizenship Theory”, in Ronald Beiner (ed), *Theorizing Citizenship* (Albany: State University of New York Press), pp. 283-322.

Lamoureux, Diane (1991)

“La citoyenneté : de l’exclusion à l’inclusion”, in Dominique Colas *et al.*, *Citoyenneté et nationalité. Perspectives en France et au Québec* (Paris: PUF), pp. 53-68.

Lévesque, Benoît and Marquerite Mendell (1999)

“L’économie sociale au Québec : éléments théoriques et empiriques pour le débat et la recherche”, *Lien social et Politiques, RIAC*, #41, pp. 105-18.

Lewis, Jane (1999)

Lindal, W.J. (1947)

Canadian Citizenship and our Wider Loyalties (Winnipeg: The Press Club).

Linklater, Andrew (1998)

“Citizenship and Sovereignty in the Post-Westphalian European State” in Archibugi, Held and Köhler (eds.) *Re-Imagining the Political Community* (Stanford : Stanford University Press), pp.113-137.

Lochak, Danièle (1991)

“La citoyenneté : un concept juridique flou”, in Dominique Colas *et al.*, *Citoyenneté et nationalité. Perspectives en France et au Québec* (Paris: PUF), pp. 179-208.

Marques-Pereira, Bérengère and Ilán Bizberg (1995)
“Contenus et contours de la citoyenneté sociale en Amérique latine”, in Bérengère
Marques-Pereira and Ilán Bizberg (dirs), *La citoyenneté sociale en Amérique latine*
(Paris: L’Harmattan), pp. 7-22.

Martin, Andrew and George Ross, *et al.* (1999)
The Brave New World of European Labor. European trade Unions at the
Millenium (NY: Berghahn).

Martin, Paul (1993)
“Citizenship and the People’s World” in William Kaplan (ed), *Belonging: The*
Meaning and Future of Canadian Citizenship (Montreal: McGill-Queen’s University
Press).

McRoberts, Kenneth (1997)
Misunderstanding Canada (Montreal: McGill-Queen’s University Press).

McRoberts, Kenneth (1997)
“Asymmetries in Canada and Spain” Paper presented to Conference on Minority
Nationalism in the Changing State Order, University of Western Ontario,
November.

Millar, John (1899)
Canadian Citizenship. A Treatise on Civil Government (Toronto: William
Briggs).

- Morris, Martin J. and Nadine Changfoot (1996)
“The Solidarity Deficit: The Rise of Neo-Liberalism and the Crisis of National Unity”, *International Journal of Canadian Studies*, issue on Citizenship and Rights, 14, fall, pp. 137-54.
- O'Hara, Kathy (1998)
Securing the Social Union (Ottawa: CPRN 02).
- Pakulsky, Jan (1997)
“Cultural Citizenship”, *Citizenship Studies*, vol.1:1.
- Pal, Leslie (1993)
Interest of State: The Politics of Language, Multiculturalism and Feminism in Canada (Montreal: McGill-Queen's University Press).
- Phillips, Susan D. (1991)
“How Ottawa Blends. Shifting Relationships with Interest Groups”, in Frances Abele (ed), *How Ottawa Spends, 1991-92. The Politics of Fragmentation* (Ottawa: Carleton University Press).
- Pollitt, Christopher (2000)
Citizens and Citizenship: Some Current Developments in the UK, A Note for the CCMD International Governance Network.
- Putnam, Robert (1993)
Making Democracy Work. Civic Traditions in Italy (Princeton: Princeton University Press).
- Rawls, John (1971)
A Theory of Justice (London: Oxford University Press).
- Rosenau, James (1995)
“Governance in the 21st Century” *Global Governance*, vol.1:1, pp.13-43.
- RCERPF (Royal Commission on Electoral Reform and Party Financing) (1991)
Reforming Electoral Democracy, volume 1 (Canada: Minister of Supply and Services)
- Santos, Boaventura de Sousa (2000)
"The GATT of Law and Democracy: (Mis)Trusting the Global Reform of Courts" in Jane Jenson and Boaventura de Sousa Santos (eds), *Globalizing Institutions: Case Studies in Social Regulation and Innovation* (Aldershot: Ashgate).
- Schnapper, Dominique (1994)
La communauté des citoyens. Sur l'idée moderne de nation (Paris: Gallimard).

- Sears, Allan, G.M. Clarke, and A.S. Hughes (1998)
Canadian Citizenship Education : The Pluralist Ideal and Citizenship Education for a Post-Modern State, Department of Canadian Heritage, Government of Canada, 1998.
- Senate, Standing Committee (1993)
Canadian Citizenship. A Shared Responsibility (Ottawa: May).
- Shafir, Gershon (ed.) (1998)
The Citizenship Debates (Minneapolis: University of Minnesota Press).
- Smith, Miriam (1998)
 "Social Movements and Equality Seeking: The Case of Gay Liberation in Canada", *Canadian Journal of Political Science* XXXI: 2, pp. 285-310.
- Snellen, Ignace (2000)
Citizenship in a small, densely populated and plural country, A Note for the CCMD International Governance Network.
- Soysal, Yasemin (1994)
The Limits of Citizenship. Migrants and Postnational Membership in Europe (Chicago: University of Chicago Press).
- Statistics Canada (1998)
Caring Canadians, Involved Canadians. Highlights from the 1997 National Survey of Giving, Volunteering and Participating
- Tamir, Yael (1993)
Liberal Nationalism (Princeton NJ: Princeton University Press).
- Taylor, Charles (1998)
 Interview, *Citizenship Studies*
- Tilly, Charles (1990)
Coercion, Capital and European States, 900-1990 (Cambridge: Blackwell).
- Thomas, Hélène (1997)
La production des exclus (Paris: PUF).
- Turner, Bryan S. (1997)
 "Citizenship Studies: A General Theory", *Citizenship Studies*, vol.1:1, pp.5-18.
- UNESCO (1994)

Citoyens de demain. Quelle éducation fondamentale pour une citoyenneté active?
(Paris: UNESCO).

Walzer, Michael (1998)

“The Civil Society Argument » in Shafir, Gershon (ed.), *The Citizenship Debates*,
(Minneapolis: University of Minnesota Press).

Vogel, Jean (1999)

“La parité et les nouvelles figures de la citoyenneté” in Jacqueline Martin (ed),
La parité. Enjeux et mise en oeuvre (Toulouse: Presses universitaires du Mirail).

Weinstock, Daniel M. (1998)

La citoyenneté comme réponse au pluralisme des sociétés modernes, Centre
d'études ethniques, l'Université de Montréal.

Weinstock, Daniel M. (1999)

“Le problème de la boîte de Pandore”, in M. Seymour, *Nationalité, citoyenneté,
solidarité* (Montreal: Liber).

Wiener, Antje (1998)

'European' Citizenship Practice. Building Institutions of a Non-State (Boulder,
CO: Westview Press).

Yashar, Deborah (1999)

“Democracy, indigenous movements, and the postliberal challenge in Latin
America”, *World Politics*, v. 52 no.1, pp. 76-104.

Young, Iris Marion (1998)

“Polity and Group Difference: A Critique of Universal Citizenship”, in Gershon
Shafir (ed.), *The Citizenship Debates* (Minneapolis : University of Minnesota
Press).

¹ It is interesting to note that within the last decade, governments in the United Kingdom (White Paper), Canada (Senate report), Australia (Joint Standing Committee report), Austria, Sweden and Denmark among others, have produced official reports on the relevance of citizenship. For details on some of these reports, see Gagnon and Pagé (1999).

² The concept of citizenship regime was developed in Jenson and Phillips (1996).

³ These three dimensions were originally worked out with Antje Wiener. They were used in Jenson and Phillips (1996). Since then Wiener has slightly redefined them for her own use (1997: Chapter 2). These three dimensions differ from the two (rights and belonging) used by Kymlicka and Norman (1995: 283) and the four developed by Gagnon and Pagé (1999: 6), who analyse the three we identify plus “other identities” as the dimensions of citizenship.

⁴ Quoting Bodin, Lamoureux (1991: 56) writes, "Les citoyens sont 'égaux en tous droits et prérogatives' et un rapport mutuel d'obligation puisque : 'C'est dans la reconnaissance du franc sujet envers son Prince souverain et la tuition, justice et défense du Prince envers le sujet qui fait le citoyen'."

⁵ Dominique Schnapper quotes Max Weber historical description of the emergence of this new status (1994: 89).

⁶ Despite his work being dated and frequently criticised, T.H. Marshall remains a central reference for anyone studying citizenship (Juteau, 1998: 50).

⁷ While many are critical because the dates of change do not correspond to his oft-quoted schema, even he was careful to moderate his position (1964: 81). For one ferocious criticism, see Birnbaum (1997).

⁸ For an analysis of the differences between citizenship rights in various countries, see Gagnon and Pagé (1999).

⁹ It is important to note that we are using the term "belonging" to refer to an identity, and not to any sense of community obligations, as communitarians sometime use the word. See for example Snellen (2000: 1), who uses it that way.

¹⁰ For an excellent example of a liberal point of view, see John Rawls, "A Theory of Justice" (1971).

¹¹ Political parties, especially in North America, have always assumed a heavy responsibility for incorporating immigrant and ethnic communities and for "brokering" these differences as well as those of language. Thus, while individuals might participate in partisan politics as members of a cultural community, and might gain access as well as sense of belonging from doing so, as "citizens" their responsibility was to the whole.

¹² For similar notions of Canada as a country of diversity, see Lindal (1947: 156-57), who calls on Canadians to make their "diverse loyalties" a model for the world.

¹³ Will Kymlicka (1998), for example, makes a clear distinction between cultural minorities resulting from voluntary immigration and national minorities whose existence precedes the formation of the state and can claim a certain territorial basis.

¹⁴ It is interesting to note that this was also, until recently, the position of the New Democratic Party of Canada regarding Quebec nationalism (see the platform for the 1997 elections).

¹⁵ Authors such as McIntyre or Sandel can be considered "conservative communitarians" because of their moral point of view, as Charles Taylor, Michael Walzer or David Miller are often categorized as "liberal-communitarian". See Helly (1998 :16).

¹⁶ These ideas are developed in Jenson and Papillon (2000) and used by Yashar (1999).

¹⁷ For an example based on the Australian experience, see J. Pakulski (1997)

¹⁸ See for example Lise Bissonette in *Le Devoir*, July 24, 1998.

¹⁹ For the Spanish example, see K. McRoberts (1999).

²⁰ For a review of the literature see Keck and Sikkink (1998).

²¹ See for example the documents of the Council of Canadians on their web site : www.councilofcanadians.ca

²² Soysal based her argument on a study of migrant workers in Europe. While they have no access to formal citizenship, they benefit from most of the protection and advantages attributed to citizens in European states.

²³ See *Law Society of British Columbia v. Andrews*, [1989] 1 S.C.R. 143.

²⁴ The case of Aboriginal peoples is of particular interest in that sense. The campaign against the Great Whale project by the James Bay Cree, even if played mostly at the international level, was directed toward Quebec state. The main objective was to access the national political space and national institutions in a direct challenge the national citizenship regime (See Jenson and Papillon, 2000). The same argument could be made with regards to Aboriginal peoples in Brazil or in Mexico who uses extensively transnational networks to make claims for a better access to the decision-making process within their own countries (see Yashar, 1999).

²⁵ European Union Treaty, section 8.

²⁶ Among them, the right to free movement within Europe, the right to residency and to work in other member state, the right to vote in and stand as candidate in local elections in any member state and to vote and stand as candidate for European Parliament.

²⁷ It is necessary to be a citizen of a Member State to be a European citizen. The European Court of Justice has stated clearly that the Union citizenship could not contradict in its substance nor replace national citizenship.

²⁸ In a 1999 Eurobarometer poll, 41% of Europeans identified only with their country, 42% with their country first, then the Union, 13% with Europe first and 4% with Europe only. It is interesting to note that European identity is strongest in small countries like Luxembourg and the Netherlands.

²⁹ The “relevance” of the federal government in Canadians’ daily life is a constant theme in federal policy development priorities since the program review of 1994. The drastic reduction in direct services resulted in a corollary lack of visibility for the government.

³⁰ In addition to nationalists claims in Quebec and from Aboriginal peoples, geographically-based autonomists claims from British Columbia, the West, Northern Ontario, Gaspésie in Quebec all have made headlines in recent years.

³¹ In Canada, the Liberal government made wide-ranging commitments in the 1944 Throne Speech, in preparation for the post-war years, promising “a national minimum of social security and human welfare”, “useful employment for all who are willing and able to work, social insurance, and family allowances (quoted in Cameron, 1997: 4).

³² For an overview of terms of citizenship, see Kymlicka and Norman (1995: 288-91).

³³ Helly (199: 35) provides a succinct summary and references to these positions.

³⁴ For some of these arguments see Birnbaum (1997: 136).

³⁵ Although Canada does much better than the United States with regard to the level of participation in federal and provincial elections in Canada, general disenchantment for politics and politicians indicate a certain decline in interest toward political issues and active involvement in politics. The level of participation in 1997 federal election was the lowest since 1925.

³⁶ Surveys have found low levels of confidence in public institutions (O’Hara, 1998: 82). But the decline thesis seems to contradict studies on high levels of participation in associative life and voluntary activities. On this topic, see Statistics Canada (1998).

³⁷ See Gagnon et al. (1998); Conseil Supérieur de l’Éducation du Québec (1998).

³⁸ See Gagnon, et al. (1998) as well as Sears (1998).