

Introduction

Globalizing citizenship studies

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The field of citizenship: legality and performativity

There are various ways of defining citizenship and, as we have witnessed in the interdisciplinary field of citizenship studies, each falls short of a satisfactory clarity or comprehensiveness. Whether citizenship is defined as membership, status, practice, or even performance, it carries an already assumed conception of politics, culture, spatiality, temporality, and sociality. To say, for example, that 'citizenship is membership of the nation-state' assumes so much and leaves so much out that it becomes an analytically pointless statement. Ironically, it is also the most common definition offered today. Similarly, to say that 'citizenship is performance' leaves as much unsaid as said about the way in which it comes into being and functions.

Is there a wide-ranging approach that can capture something essential about citizenship without making too many assumptions about what it involves? Is there a definition that leaves plenty of room for questions but still provides a focused perspective? *Our best offer is to define citizenship as an 'institution' mediating rights between the subjects of politics and the polity to which these subjects belong.* There are several things of note in this minimalist yet broad-ranging definition. First, 'institution' here should obviously not imply a narrow conception of organization. It implies a broader conception of processes through which something is enacted, created, and rendered relatively durable and stable but still contestable, surprising, and inventive. Second, we use the term 'polity' to move away from the idea that the state is the sole source of authority for recognizing and legislating rights. There are international polities such as the European Union or the United Nations as well as many other covenants, agreements and charters that constitute polities other than the state. Third, note that we suggest using 'political subjects' rather than 'citizens' as the agents of the mediation in hand. This is because not all political subjects will have the designation of citizens. This also clarifies our use of 'belongs', which we take to include official and non-official forms, legal and extra-legal belongings. Note also that we use 'subjects' in the plural because citizenship involves collective mediations and not just the relationship individuals have with their polity. Either way, whether certain political subjects can make claims to being, or constitute themselves as, citizens is an important aspect of the politics of citizenship or politics for citizenship. Finally, note the double meaning of 'political subjects'. Just now we used it to signify those people who have constituted themselves as subjects of politics in the sense that they

act as political subjects. But 'political subjects' can also mean those issues that are the topic of discussion under the designation 'political'. In other words, the topics that come under discussion during the mediation of rights between political subjects and polities are themselves a political subject. So when we say 'mediation between the subjects of politics and the polity to which they belong', we mean that politics *for* citizenship involves both where and how this mediation occurs, who becomes implicated in these rights, and what rights are the focus of mediation.

Yet this wide-ranging but focused statement still belies the fact that the citizen of a polity almost never belongs only to that polity but to several nested, if not overlapping and conflicting, series of polities ranging from the city, region, the state, and the international. Clearly, in the contemporary world the dominant polity is the state, but even its dominance is now implicated in various international and regional polities evinced by international covenants (e.g. the European Convention on Human Rights), multilateral agreements (e.g. the North American Free Trade Agreement), supranational bodies (e.g. the European Union) and shared sovereignty arrangements (e.g. Scotland or Quebec). This is further complicated by the fact that many citizens (and non-citizens) in the contemporary world do not reside in their birthplace but in their adopted countries. All this places a citizen in a web of rights and duties through which he or she is called upon to performatively negotiate a particular combination that is always a complex relationship.

For these reasons it is misleading to begin thinking about citizenship as a unified (or unifying) and static relationship. A Chinese government cannot have a unified and singular relation with its citizens, since their lives are mediated not only through their rights from, and duties to, the Chinese state but also through human rights, environmental or cultural discourses to international politics beyond its borders. Similarly, a British government cannot have exclusive relations with British citizens, as their lives are implicated in, and interdependent with, the European Union as a supranational polity, the European Convention on Human Rights, and myriad other mutual rights and duties toward other polities. Even in the area of national security – long the domain of the sovereign, often in exceptionalist forms – private corporations have emerged as competitors in the emerging market for providing protection to citizens, militaries, individuals, and neighbourhoods. Whilst still dominant, the state, therefore, cannot be said to have an exclusive claim over its members.

How do we then approach citizenship in the contemporary world? If indeed it is a negotiated and dynamic institution mediating rights between political subjects and their polities, two key dimensions require emphasizing. One is the combination of rights and duties that defines citizenship in a polity. The other is the performance of citizenship. Research in citizenship studies tends to follow parallel lines with scholars adopting or favouring one dimension over the other. We consider both dimensions to be indispensable for understanding how citizenship mediates rights between citizens and the polity to which he or she belongs.

The combination of rights and duties is always an outcome of social struggles that finds expression in political and legal institutions. Traditionally, in modern state societies, three types of rights (civil, political, and social) and three types of duties (conscription, taxation, and participation) defined the relationship between the citizen and the state. Civil rights include the right to free speech, to conscience, and to dignity; political rights include franchise and standing for office; and, social rights include unemployment insurance, universal health care, and welfare. Although conscription is rapidly disappearing as a citizenship duty, taxation is as strong as ever and jury duty, even as it is increasingly challenged under certain circumstances, still serves a fundamental role. Moreover, new rights have appeared such as sexual, cultural, and environmental rights with varying degrees of success of institutionalization (e.g. witness the struggles over same-sex marriage in the United States and Europe). Again, as we have mentioned, whether

classical (civil, political, social) or expanded (sexual, environmental, cultural), these rights and duties are mediated through other polities that influence the actual combination that obtains in a given polity at a given time.

The older and more theoretical classifications of ideas of citizenship (such as liberalism, republicanism, and communitarianism) make much less sense now given the contemporary complications just mentioned. Since the combination of rights and duties and their performance vary greatly across polities, it is probably more accurate to speak about various citizenship regimes that characterize a similar, if not co-dependent, development of certain combinations. We can, for example, talk about an Anglo-American regime (e.g. Britain, the US), a North European regime (e.g. Denmark, Norway), a continental regime (e.g. France, Germany), a South American regime (e.g. Brazil, Chile), a South Asian regime (e.g. India, Pakistan), and so forth. We can also talk about postcolonial citizenship regimes (e.g. India, Brazil, Ghana), post-communist citizenship regimes (e.g. Poland, Hungary, even China), neoliberal citizenship regimes (e.g. Britain, the US), post-settler citizenship regimes (e.g. Canada, Australia), or settler regimes (e.g. Israel). Arguably, each of these regimes has a different combination of rights and duties of citizenship but each displays a recognizable culture of rights and duties. The proliferation of these overlapping regimes, moreover, speaks to the need for scholarship on citizenship to appreciate the multiple ways in which citizenship has itself been globalized. The field of citizenship studies is globalizing because people around the world are articulating their struggles through citizenship.

The performance dimension of citizenship highlights two issues. First, rights and duties that are not performed remain as inert or passive rights and duties. These rights and duties are brought into being only when performed by citizens. Consider, for example, conscription as a duty. As we have mentioned, although declining, if it exists on paper, states may occasionally invoke this in times of conflict or war. Secondly, since citizenship is brought into being by being performed, non-citizens can also perform citizenship. In fact, those who do not have the status of citizenship but obtain it by making claims to it often negotiate many rights and duties. This performative aspect of citizenship has been expressed in various ways, most notably in the language of active versus passive citizenship.

These two dimensions of citizenship permeate social and political life to a greater degree than meets the eye. It is citizenship studies scholarship that brings them into light in analytical terms. When people mobilize for legalizing same-sex marriage, rally for social housing, protest against welfare cuts, debate employment insurance, advocate the decriminalization of marijuana, wear attire such as turbans or headscarves in public spaces, leak information about the surveillance activities of their own governments, seek affirmative action programmes, or demand better health-care access and services, they tend not to imagine themselves as struggling for the maintenance or expansion of social, cultural, or sexual citizenship rights. Nor do governments recognize them as such. Instead, people invest in whatever issues seem most related and closest to their social lives, and dedicate their time and energy accordingly, and governments respond or fail to respond to these demands. There are two points to make about such struggles. First, they are irreducibly social struggles that arise from social existence. To classify such struggles either as redistribution (economism) or recognition (culturalism) misses their complexity and the political stakes involved. Secondly, while they may not clearly articulate it, it is important to acknowledge that when people engage with such issues, whatever differences may separate them in values, principles, and priorities, they are performing citizenship, even those who are not passport-carrying members of the state (non-citizens). But by so doing they shape both subjects of politics and political subjects. Thus, citizenship is certainly much more than legal status, although formal legal citizenship remains important for accessing citizenship rights. Although

it mediates between citizens and politics, citizenship does not always take the form of demands on government.

We can conclude that if citizenship mediates rights between political subjects and the polity to which they belong, it also involves the art of being with others, negotiating different situations and identities, and articulating ourselves as distinct from, yet similar to, others in our everyday lives. Through these social struggles, citizens develop a sense of their rights as others' obligations and others' rights as their obligations. This is especially true for democratic citizenship, as it is the only form of citizenship that approaches the combination of rights and duties as a dynamic (and thus contested but changing and flexible) outcome and its creative performance as a fundamental aspect of a democratic polity. Citizenship, especially democratic citizenship, depends on the creative and autonomous capacities of political subjects whose performance of citizenship is not only the driving force for change but also the guarantee of the vitality and endurance of the polity. Governments may see domains of citizen engagement as separate from each other in the everyday governing of the polity and in the social lives of their citizens, but occasionally an event reminds everyone that citizens are indeed participating in the performance and enactment of citizenship. It is in this deep and broader sense that citizenship is social and politics (or, rather, authorities responsible for governing them) neglect this often with perilous consequences. This is where the responsibilities of citizenship studies scholarship may assume a significant public and political role.

The figure of citizenship

We have seen how central citizenship is to understanding how people become claimants and thereby constitute themselves as political beings in relation to the politics to which they belong. But what of the *figure* of the citizen? In contemporary political debates and analyses of political mobilizations, the figure of the citizen remains highly enigmatic, vacillating between being an object of desire and derision. The figure of the citizen is at once a figure of hope and enlightenment, on the one hand, and deep pessimism and suspicion on the other. Hope, because citizenship remains the dominant institution through which civil, political, and social rights are enacted and enjoyed. Enlightenment, because citizenship is said to confer upon its bearer human dignity, autonomy and agency. By contrast, the pessimism about citizenship arises because there are inevitable inequalities as to how these rights are distributed. The suspicion towards citizenship comes from misgivings about its ability to move beyond some fundamental exclusions it enacts on the basis of race, gender, place of birth, sexual orientation, and so on. Citizenship in this view is not just a name for membership, but a title or a rank that separates, excludes, and hierarchizes.

While citizenship as an institution is dynamic and mutable, the figure of the citizen today is a polarizing figure. The citizen stands for inclusion, membership, and belonging, but at the expense of others who are excluded, non-members, and outcasts – strangers, outsiders, and aliens. The citizen stands on one side of the political, social, and cultural borders of the polity, with non-citizens on the other. The inside/outside logic of this narrative has not surprisingly generated significant criticisms, to the extent that some commentators, on both the Right and the Left, have declared citizenship to be an unsustainable category through which to organize modern political life. What is the substance of this criticism and why do we insist upon the continued relevance of citizenship?

Caught as it is between these twin discourses of hope and despair, a commonly heard criticism of citizenship is that it is in decline. In its most general form, the criticism of citizenship is couched in a broad critique of modernity. Citizenship, it is said, suffers the same pressures as other categories from western political traditions – such as the state, sovereignty, society, and so

on – that are being fundamentally problematized by processes of neoliberalization, globalization, securitization and postmodernization. In this rendering, all the categories of modern politics are in crisis and citizenship is no exception (Fahrmeir 2008).

In contemporary political debates, the pessimism about citizenship is often framed in relation to the increasingly restrictive barriers that are being placed on international mobility and on attaining citizenship itself. These restrictions are enacted through the twin dimensions of legality and performativity that we discussed above. The proliferation of citizenship tests across national contexts is a good example. Here, one's success in becoming a legal citizen is dependent upon the demonstrations of certain attitudes, dispositions and values. Studying for citizenship is not about critical consciousness or becoming an active, let alone an activist, citizen, but is rather about learning and conforming to the 'correct' form of civic behaviour demanded for newcomers.

These misgivings about citizenship are not limited to how it erects barriers or excludes non-members, but also include criticisms about the present-day gap between the legal and performative dimensions of citizenship. As we have already mentioned, constitutional rights and duties that are not performed are passive rights and duties. Rights and duties are brought into being only when citizens actively perform them. The falling rates of voter participation, the widespread cynicism towards taxation, and the decline in military conscription are all key features in this passivity. Moreover, many of the rights of citizenship are being stripped away, often in the name of 'national security' (too risky to the polity as a whole to guarantee individual rights) or 'responsible citizenship' (some citizens are not worthy of rights because of their perceived behaviours). The traditional distinction between citizen and 'second-class citizen' is therefore giving way to a pluralized field of racialized citizens, neurotic citizens, irregular citizens, abject citizens, and so on.

According to this line of critique, the promises of citizenship are empty promises. For example, while the pillars of Marshall's (1949) figure of the citizen – as someone who enjoys civil, political, and social rights – have long been criticized for not taking into account deep social inequalities unaddressed by these rights, today a more disturbing critique is emerging: the performance of these rights is increasingly meaningless, without substance. We have performativity without content: citizens are workers, but there are no jobs; citizens are participants, but public spaces are disappearing; citizens are endowed with the capacity for political speech, but no one is listening. Yet, citizenship remains a part of the state's apparatus of capture. In binding the individual to the polity of the state it forecloses the possibility for alternative forms of political subjectivity. The citizen becomes the prisoner of the state, or more ominously, of the institution of citizenship itself (López-Petit 2011).

This line of critique has led some to conclude that the institution of citizenship is now a hopeless category that is complicit with the ongoing exclusions and exploitations of state and capitalist forms of power. As such, citizenship is beyond rehabilitation; it should be deserted, abandoned, and discarded. The task of reinvigorating progressive politics, according to one philosopher, must now begin by asking the question, 'What if we refuse to be citizens?' (López-Petit 2011). These critiques are animated by a certain imaginary about politics, which claims that the only politics that can contest institutions of domination and exclusion come from the 'outside'. Citizenship is too closely associated with the state – with the Inside – and is therefore complicit with existing systems of domination and exclusion. The space of freedom and autonomy must be created elsewhere. We therefore find ourselves in the situation where there is a competition to invent new names to describe the political subjects that are enacting political agency today. Whether it is the Activist or the Actant, the Militant or the Multitude, there is no lack of new concepts that are ready to sweep away and then take the place of citizenship.

These gestures are provocative. Indeed, we share many of these criticisms, and we have written, along with others (Isin 2002, 2004, 2008, 2012; Nyers 2003, 2006a, 2006b, 2011), about

the limits of citizenship, conventionally conceived. We admit that there is something seductive about the gesture of 'refusal', which, like 'exit', 'exodus', and 'desertion', has come to inform debates on the Left about new forms of being political (Virno 1996). Ultimately, however, we are critical of gestures like 'refusal' when they are framed in relation to an imaginary of political space that is 'outside' citizenship. While the imaginary of the outside is quite deep-seated in debates on the Left, it is nonetheless marked by some serious limitations – not least a certain academicism. For example, a common counterargument is that those who argue most vociferously for rejecting citizenship can do so because they have nothing to risk. There is the paradox that it is precisely citizenship in its legal, constitutional form that enables a rejection of citizenship. Consider, for example, when activists who reject citizenship for its perceived connections with neoliberal capitalism and statism fall back on their citizenship to combat the excess of the state police forces (e.g. through court battles about civil rights to free speech, assembly, and so on).

More fundamentally, at stake here is the larger issue of whether there is an outside from which one can speak, act, and be political. Here, we agree with Foucault, Deleuze, and others who argue that there is no such outside, only immanent relations and struggles. This does not preclude the possibility of ruptures, breaks, or disruptions of the relations between people and politics that the institution of citizenship mediates. On the contrary, the dynamism of these immanent struggles ensures that citizenship is subject to what Balibar (2004: 10) calls 'permanent reinvention'. But if the challenge does not lie in finding an alternative to citizenship as a way of naming political subjects or even political subjectivity, a more difficult and uncomfortable question remains: Is citizenship something we can even reject?

Derrida's idea of 'erasure' provides some help in addressing this question (Derrida 1998). For Derrida, to write 'under erasure' is to write and delete simultaneously, to script and cross out, to present and bracket, create and destroy. Erasure allows one to posit something affirmatively and yet remain skeptical and question it as a problematic. Erasure brings both the concept and the deletion to the forefront in order to allow for some critical distance. In this way, erasure involves a different kind of temporality. Arendt put this time of erasure as the space between 'no-longer' and 'not-yet' (Arendt 2005: 158–62). It demands a disposition that is both, and yet not quite, after the past and before the future. Far from being politically debilitating, the indeterminacy of this orientation allows for the negotiation of many of citizenship's paradoxes and ambivalences. To approach citizenship 'under erasure' is to script and delete the concept simultaneously.

There are some important implications of Derrida's sensibility for our relationship to citizenship. The 'no-longer' implies that we can no longer think of citizenship in the way we used to; the 'not-yet' reminds us that we are not quite at the situation where it no longer applies. In other words, we have a responsibility to what we inherit but that does not mean we have to be dogmatic. It is difficult to escape from the categories we inherit. We find in that space between the 'no-longer' and 'not-yet' neither optimism nor pessimism and neither hope nor despair but a space of hyper-activism – an activism without guarantees and without programmes and yet with considerable vigilance and skepticism. But if citizenship is always to come, do we even have the right to give it up? Do we have a choice about our responsibility to the past and that which is still to come? We believe that Derrida's sensibility (with echoes of Kierkegaard, Nietzsche, Heidegger, and Arendt) is what underlies much of what could be described as 'critical citizenship studies'.

The worlds of citizenship

As the discussion above illustrates, not only do we think that citizenship can be understood as an institution mediating relations between political subjects and their politics, but also that this institution belongs to world history rather than arbitrarily drawn cultural segments of it such as

‘Europe’ or ‘The West’. This second assumption is harder to maintain and is controversial. This is because, for generations, especially since the beginning of the twentieth century, social sciences in the West operated with the assumption that citizenship was a uniquely Western institution that not only explained the differences between despotic and authoritarian regimes in the East but also ostensibly explained why the West ‘took off’ and the East has stagnated. Thus the assumption crosses over from being an analytical distinction between East and West to include a normative assumption of the Western conception of the political subject being superior to its Eastern counterpart. Regrettably, we do not find this assumption only in the classics of the twentieth century but still pervading dominant forms of social sciences and humanities in the twenty-first. It is still often assumed that if citizenship exists in the East (or South), it is only because it has been historically imported from the West. And since it is imported from the West, it always remains imperfect in its development and always catching up with the original, which keeps changing. That historically non-European or non-Western societies would have developed citizenship in the sense in which we defined it as a mediating institution between political subjects and their polities remains an alien assumption in dominant social sciences and humanities.

This is often done by ignoring or neglecting the specific ways that citizenship is enacted globally and working with an all-encompassing idea of ‘liberal democracy’. So rather than analytically and specifically investigating the ways in which the relations between political subjects and polities are mediated, the preference has been for developing a definition of ‘liberal democracy’ that ostensibly obtains in the West and comparing whether Eastern societies have reached it as an end point. We have witnessed the operation of this logic (which we may call ‘democracy’s empire’) during the so-called rise of Brazil, Russia, India, and China at the beginning of this century. The question often asked about these societies is whether their economic growth can be matched with political development to reach liberal democracy. The answers invariably revolve around how liberal democracy pervades the West and is lacking in the East (and the South). The assumption here is that these societies could not find alternative and different ways of mediating relations between political subjects and their polities and that their economic development (a euphemism for capitalism) must be matched with political development (a euphemism for liberal democracy). This has been most visible in the development of the Copenhagen Criteria for entry into the European Union as a member state and the way in which such criteria as ‘democracy’, ‘rule of law’, ‘human rights’, and ‘the protection of minorities’ are understood and used in negotiations with successive Turkish governments. The imposition of such criteria has the effect of ruling out the possibility that Turkish society may wish to develop modern institutions mediating relations between political subjects and their polities in a manner that is not mimetic but authentic, carefully observing its historical trajectories. Thus, the mantra of liberal democracy, whilst bypassing citizenship as a mediating institution, performed a similar logic to nineteenth-century orientalism though with a different focus and emphasis. If orientalism in the nineteenth century was at pains to describe why the East did not develop, and in the twentieth century it was used to explain why the bright future decolonization promised was seemingly not delivered, in its twenty-first century form orientalism sets the East on the path to the West’s development.

We have also witnessed this neo-orientalism more recently during the so-called Arab Spring. Again, for many scholars it was convenient to interpret the uprisings and demonstrations in Libya, Tunisia, Egypt, and Syria as yearnings for liberal democracy, at the same time forgetting that these previously authoritarian regimes have been covertly or overtly either products of Western imperial and colonial adventures or have been supported by imperial powers not only through arms sales but also through cultural diplomacy throughout the twentieth century, but especially in its later decades and the early twenty-first century’s. Be that as it may, it has been particularly instructive to see a new orientalism at work. Without following the universal script

of liberal democracy, it seemed impossible that so many people who have lost or risked their lives and creatively and inventively challenged authorities and their violence could and would have been capable of imagining and enacting mediating institutions between political subjects and their polities. Many scholars have been unable to accept or entertain that possibility precisely because of the orientalist construct of liberal democracy.

To investigate citizenship as a mediating institution between political subjects and their polities disrupts this game of benchmarking with liberal democracy and aims to focus attention on the ways in which the kernel of any political order – the political subject – is brought into being. This not only challenges contemporary forms of neo-orientalism, but also the historical hubris that comes with the assumption that certain key political concepts – namely citizenship – are only conceivable in terms of their Western origins.

The struggles of citizenship

So far we have emphasized how our definition of citizenship as an institution that mediates between political subjects and the polities to which they belong is a historical and dynamic definition, which is open to contestations about the meaning and content of the institution, the terms of the mediation, and the sites of belonging. Because contestation is at the heart of our definition, we believe that citizenship is fundamentally about political struggles over the capacity to constitute ourselves as a political subject. We use 'ourselves' here to indicate that as authors we do not see ourselves independent from these struggles, and also to emphasize that the constitution of political subjectivities is always simultaneously individual and collective struggles. As citizenship studies scholars we position our investigations of citizenship in ways that are attuned to, and part of, these struggles.

As we have already seen, whether in terms of classical (civil, political, social) or expanded (sexual, cultural, environmental) rights, the rights of citizenship have always involved social struggle. This includes the struggle for a right to be recognized as a right in the first place, and then the struggle for the breadth and depth of these rights (who gets what and how much). If struggle both precedes the conferral of rights and extends long after its recognition as legitimate by the polity and other citizens, we argue that the same is true for citizenship itself. The point is that prior to being recognized as a rights-bearing subject, people engage in a struggle that requires the enactment of subjectivity that is capable of rights. Arendt famously described this as a struggle for the 'right to have rights' (Arendt 1973). We would revise this formulation slightly and emphasize the agential part of this struggle by insisting that what is at stake is the right to *claim* rights. This is the struggle for political subjectivity – that which we call citizenship.

But are we merely interpreting every struggle as citizenship? The sensibility we ascribed to Derrida above would lead us to answer 'no-longer' and 'not-yet'. Citizenship is not always about struggle – it is obviously part of the state's toolbox of management and governance of the population, both at the national and international level. In response to the claim that citizenship has lost all its relevance to the contemporary politics, we would say 'not-yet'. We insist that citizenship enables subjects to become claimants. It therefore always involves moments of transformation: from the static recipient to the dynamic claimant, from passive to active. Crucially, this involves the claim to rights that one does not have or otherwise would have no business claiming.

Struggles of citizenship in relation to the polity are most obviously made in relation to the modern state. However, we have already seen how citizens do not belong to one polity but to many overlapping and conflicting polities (city, region, state, international). These polities are not in a historical queue for dominance, but are rather coeval and marked by a contested coexistence. The struggles of citizenship are therefore also struggles about authority in spaces and times

that are autonomous, yet implicated, in the space of the dominant polity of the state. The revival and international spread of the Sanctuary City movement is a good illustration of this struggle over space. Sanctuary movements aim to provide protection and rights to non-citizens who are living in a city but without the legal authorization of the state. As a result, refugees and irregular migrants are able to enact themselves as claimants in relation to the cities and towns in which they live. They are able to claim many of the rights of social citizenship through municipal authorities and agencies, even if many civil and political rights are denied them. Moreover, once local authorities, such as school boards, begin declaring certain zones or places in the city as off limits to immigration and removal officers, they begin to take on the duties of protection that are usually jealously guarded by state-level officials. Similarly, struggles over creating a digital commons without commercial and governmental intrusion to enable people to share their knowledge and expertise have offered us a glimpse of an incipient 'digital citizenship' in cyberspace.

Our definition of citizenship can also apply to other cosmologies of being political. Many of our political concepts have different inflections when you combine them with other values or visions – e.g. indigenous approaches to protests will incorporate radically different ideas of space, time, and property rights. The border struggles of indigenous people living in territories that traverse international boundaries are a good illustration of this complexity. Making claims as a Mohawk living in Kanton'ke:haka territory and possessing a broader citizenship to the Haudenosaunee Confederacy gives radically different meanings to the terms citizen, polity, and the international. The terminology of the Westphalian system of states remains the same, but it is under erasure: it is 'no-longer' the citizenship, sovereignty, and internationalism of the Westphalian system, but it is also 'not-yet' a situation in which these categories for explaining the institutions involved in the mediation of political subjects with the polities in which they belong are no longer required.

Since citizenship involves struggles that are not just about rights and recognition, but about the contested constitution of subjectivity and polities themselves, we argue that citizenship remains a significant site through which to develop a critique of the pessimism about political possibilities that we saw above. It is only when we assume that the powers of sovereignty and capitalism are ubiquitous that such a deep pessimism about political agency is able to take root. Our approach to citizenship is broader and speaks of the multiple forms of polities that people find themselves in a contested and conflicting relationship to. Again, while it is arguably true that the state remains the dominant polity today, this does not change the fact that there are a host of other polities, too, that involve both obvious and not so obvious forms of political community. We believe that the focus on the struggles of citizenship allows for both a critical engagement with sovereign power and capitalist power, but also rescues more contingent and unexpected moments of political action, subjects, and polities from being relegated to the sidelines of political analysis.

The cover photograph of the *Handbook* captures this essential point. Pictured is a housing squat in Berlin, beautifully painted in lively colours and with evocative illustrations. Painted also is the slogan of this community: 'Es wird immer komplizierter einfach zu leben.' – 'It is becoming ever more complicated to live simply.' The simple right to housing becomes an act of citizenship because it is a right that has to be repeatedly claimed and performed through social struggle.

The incipient citizenship(s)

There are then struggles all around the world that no longer recognize the limits imposed on people and their political subjectivities but have not yet articulated terms appropriate beyond these limits. Calling these struggles 'incipient citizenships' may remind us of our responsibility

as scholars to not only politically recognize these struggles but also analytically shape them. We know something that may well elude the agents engaged in the struggles over the space between 'no-longer' and 'not-yet', that new political subjectivities never became incipient citizenships without being waged against already established norms, authorities, dominations, and power relations. If women's struggles for equal rights still sound so recent that is not only because the memories of the suffragettes are still fresh but also because these struggles still continue in the present (Mayhall 2003). Are there no traces of the suffragettes in Femen? Similarly, 2013 may well have 'celebrated' the fiftieth anniversary of Martin Luther King's 'I have a dream' speech or seen the unveiling of Rosa Park's statue in Washington, but is the struggle for civil rights for blacks not as intense as it was half a century ago? Finally, to a new generation the struggles over rights for lesbians, gays, queers, and trans peoples may appear 'almost won' but will they remember 'Stonewall', which symbolized decades of brutal police raids in New York, San Francisco, and Toronto (Armstrong and Cragge 2006)?

The point here is not simply to remember the lineages of continuing struggles over rights but to emphasize that the politics of citizenship, or perhaps politics *for* citizenship, requires, as Weber once put it, strong and slow boring of hard boards. Yet it not only takes passion and perspective, as Weber thought, but it also takes *time*. The space between 'no-longer' and 'not-yet' may sound like a small space but it is an enduring time. So politics *for* citizenship takes not only passion and perspective, and time; above all it requires boundless patience, perseverance, and resilience. All incipient citizenships embody these qualities in those who did their time for them. In an age of 'clickivism', simultaneity, and instant gratification, this may well not be the lesson that will resonate. Yet it is perhaps the most enduring lesson that we learn from the history of struggles.

This is a lesson that Foucault drew from his historical studies of political subjectivities (Foucault 1997). His approach to the present as being neither new nor eternal but a specific constellation inspires our approach to incipient citizenships signifying a space of politics between 'no-longer' and 'not-yet'. For Foucault one of the enduring qualities that we inherit from the Enlightenment – not as an event but as an ethos – is precisely this approach to contemporary struggles that refuses to fit them into an already known series (such as 'liberal democracy') while acknowledging (as we did above with women's rights, civil rights, and sexual rights) their lineages and inheritances. Methodologically, this requires us to approach contemporary struggles with a keen eye and ear for the practical vocabularies that people use and then evaluate whether and, if so to, what extent these struggles constitute incipient forms of citizenship. It may have come as a huge surprise to Edward Snowden that the American security apparatus is spying on American citizens as well as non-citizens. He may have interpreted this as a breach of the first amendment of the constitution. But it is scholars who identify it as a key issue of citizenship rights and remind us that the first amendment is a politically gained right of specifically American citizenship. Similarly, as the famous 'bodies upon the gears' speech by Mario Savio on 2 December 1964 taught us, the guarantee of free speech consists not only in its legality but also performativity (Vaughn 1998). Sometimes free speech must take the form of an interruption of the dominant speaking order. Unless there is vigilance about such rights – and, at times, a daring to enact them in defiance of dominant powers – corporate and state authorities will violate them in the name of commercial or security interests.

We said earlier that it is in this performative sense that citizenship is social and politics (or, rather, authorities responsible for governing them) neglect this often with perilous consequences. Yet, the legal aspect of citizenship is equally significant, as it both enables and provokes its performativity. It is at the intersection between legality and performativity where the responsibilities of citizenship studies scholarship may assume a *global* public and political role. We hope this *Handbook* contributes to articulating those responsibilities.

References

- Arendt, Hannah (1973), *The origins of totalitarianism* (2nd edn., New York: Harcourt Brace Jovanovich).
- Arendt, Hannah (2005), *Essays in understanding 1930–1954: formation, exile, and totalitarianism* (New York: Schocken Books).
- Armstrong, Elizabeth A. and Cragge, Suzanna M. (2006), 'Movements and memory: the making of the Stonevall myth', *American Sociological Review*, 71 (5), 724–51.
- Balibar, Etienne (2004), *We, the people of Europe? Reflections on transnational citizenship* (Princeton: Princeton University Press).
- Derrida, Jacques (1998), *Of grammatology* (Baltimore: The Johns Hopkins University Press).
- Fahrmeir, Andreas (2008) *Citizenship: the rise and fall of a modern concept* (New Haven: Yale University Press).
- Foucault, Michel (1997), 'What Is Enlightenment?', *Ethics: subjectivity and truth* (The essential works of Michel Foucault, 1954–1984, 1; New York: New Press), 303–20.
- Isin, Engin F. (2002), *Being political: genealogies of citizenship* (Minneapolis: University of Minnesota Press).
- Isin, Engin F. (2004), 'The neurotic citizen', *Citizenship Studies*, 8 (3), 217–35.
- Isin, Engin F. (2008), 'Theorizing acts of citizenship', in Engin F. Isin and Greg M. Nielsen (eds.), *Acts of citizenship* (London: Zed Books), 15–43.
- Isin, Engin F. (2012), *Citizens without frontiers* (London: Bloomsbury).
- López-Petit, Santiago (2011), 'What if we refuse to be citizens? A manifesto for vacating civic order', *borderlands e-journal* 10:3, 1–11.
- Marshall, Thomas H. (1949), *Citizenship and social class*, ed. T. B. Bottomore (Pluto Perspectives; London: Pluto Press).
- Mayhall, Laura E. Nym (2003), *The militant suffrage movement: citizenship and resistance in Britain, 1860–1930* (Oxford: Oxford University Press).
- Nyers, Peter (2003), 'Abject cosmopolitanism: the politics of protection in the anti-deportation movement', *Third World Quarterly*, 24, 1069–93.
- Nyers, Peter (2006a), *Rethinking refugees: beyond states of emergency* (London: Routledge).
- Nyers, Peter (2006b), 'The accidental citizen: acts of sovereignty and (un)making citizenship', *Economy and Society*, 35, 22–41.
- Nyers, Peter (2011), 'No one is illegal between city and nation', *Studies in Social Justice*, 4, 127–43.
- Vaughn, Pamela (1998), 'Cicero and Mario: the scholar as activist', *Pacific Coast Philology*, 33 (2), 87–96.
- Virno, Paolo (1996) 'Virtuosity and revolution: the political theory of exodus', in Michael Hardt and Paolo Virno (eds.), *Radical thought in Italy: a potential politics* (Minneapolis: University of Minnesota Press), 189–209.

Navigating global citizenship studies

Jack Harrington

Thinking about citizenship studies globally requires charting the complex and diverse ways in which people constitute themselves politically. To the same degree, the global perspective also exposes and exasperates the strains and discords in the concept as we understand it today. The chapters of this *Handbook* are collected into two thematic sections, four broad geographic regions, and two deterritorialized groupings ('Diasporicity' and 'Indigeneity'). Beyond the convenience of compiling and reading, these divisions represent little more than one of the few mutually exclusive ways of clustering the chapters. Even then, we talk of 'Africa', 'Asia', and so on. The plural denotes the multiple ways in which such conceptions are actually rendered. In terms of what they say about citizenship, the chapters can also be drawn together into many overlapping, sometimes jarring, sets of topics. The following guide aims to identify the most striking of those other groupings in order to indicate to the reader more detailed areas of interest and also to suggest trends of current and future concern. The themes identified below are by no means comprehensive; instead they reflect the multifarious nature of citizenship itself as it is experienced across the globe.

Beyond the mix of disciplines and geographical foci, the chapters in this *Handbook* share a vision of citizenship as continually reconstituted and renewed through struggle across a range of sites and scales, and not simply at the level of the nation state. Four major themes will be elaborated below. The first examines the most pronounced methodological innovations and trends reflected in the *Handbook* as a whole. The second looks at the ways in which contemporary citizenship across the globe is conceived historically. When navigating global citizenship studies, western paradigms of a classic Greco-Roman lineage are often less relevant than the history of colonial struggle, modern state formation, and the erosion of social-democratic norms in the face of neo-liberalism. The third section reviews chapters that explore how citizenship in an era of globalization is increasingly less about membership of a polity and more about traversing boundaries between polities. The fourth and final section evaluates the unifying theme of the *Handbook* – citizenship as struggle.

Methods for understanding citizenship on a global scale

A number of common approaches and methodologies become clear in this global survey of citizenship. Few chapters preserve a neat division between citizenship as status and the ways in

which it can be practised or performed. Yet, points where the two connect raise four major issues, discussed below: how to talk about citizenship as political subjectivity across a range of polities and cultures; the need for a topological understanding of how citizenship is located and related to concepts of borders; the idea of citizenship as something that is performed or enacted; and how citizenship as a grouping of rights connected to a polity is to be recognized.

First, the *Handbook* moves beyond Euro-American dominance in thinking about citizenship. This can be seen as an attempt to abandon assumptions that come under unbearable strain when writing on a geographically global scale. An overwhelmingly strong principle that emerges is that an ever-expanding concept of the liberal subject should not be mistaken for the ability to perceive multiple political subjectivities. Edward Said's *Orientalism* continues to trouble our understanding of why certain groups are assumed to be unable to enjoy certain rights, particularly with reference to Islam (see Banko, Kiwan, Perrin). In his chapter, Morrison reminds us that it is not simply Islam that has been attenuated as a political force by the perspective of orientalism. He argues that an effect of orientalism, and of Said-inspired critiques of it, has been the marginalization of Buddhism's role in shaping Asian citizenships. Indeed, orientalism is merely a particular set of discursive strategies that suggest certain groups lack the full capacity to act as political subjects. Cirkovic likens the assumed unsuitability of citizenship norms for the Balkans to orientalism. Equally, the tendency to see indigenous political practices as simply traditional or somehow static is challenged by Latta and Wittman and by Wiebe. As Sabsay demonstrates with sexual citizenship, 'the universalization of individualized free will, rationality, and moral autonomy as the conditions of possibility of sexual politics within the field of sexual citizenship, restricts our ideas of political subjectivity to a specific cultural tradition, namely that of liberalism'. At the same time, as Guo illustrates in relation to China, we must provide analytical space to understand how 'Western' concepts have been appropriated and resignified as much as they have been imposed. Indeed, as Lee cautions, discussing citizenship on a global scale increases rather than lessens the dangers of Western bias, Eurocentrism, or orientalism. At stake is the way in which conceptual frameworks limit our ability to analyse citizenship as it is manifested around the world. A major preoccupation in this regard is the binary of insider/outsider or the analogous one of citizen/alien. The ways in which the mutability of such positions are used by governments for political expediency are considered by Dorman and Hepworth. Understanding citizenship as the capacity or the attempt to traverse this divide is the conceptual focus of a number of chapters including those by Hepworth, Nyamjoh and Brudvig, and Swerts. Yet, multi-ethnic populations and differentiated citizenship statuses within polities expose the inadequacies of such binaries to convey the complexities of how people are excluded from the full enjoyment of citizenship (see Abu-Laban, Albarazi and Van Waas, Assal, Ilcan, Jayal, and Reed and Rush). Pullano and Ní Mhurchú both caution against foregrounding binaries of inclusion and exclusion at the expense of recognizing how a mesh of alterities is continually produced to mark the borders between who can and who cannot be a citizen (Isin 2002).

Secondly, as citizenship becomes increasingly deterritorialized, problems of relating it to space become more apparent, and many chapters address the need for a topological approach. As Hepworth puts it, 'while "illegality" has often been assumed to be produced at the border – in the act of crossing with or without authorization – it is, in fact, also produced beyond and within the borders of the nation-state through various technologies that differentiate and regulate individuals before, during, and after that crossing'. The concept of border cannot simply be understood spatially (see Pullano, and Martignoni and Papadopoulos). Rygiel's concept of transgressive citizenship, using the example of recording and memorializing the deaths of illegal immigrants crossing borders, shows how bodies themselves have 'the potential to subvert or undermine the ontological borders underpinning modern citizenship of whose lives should

count, that is of who should be recognized as a political subject with the rights to have rights'. Indeed as Hepworth states: 'A topological approach emphasises the proliferation of inside-out and outside-in positions that are produced through the act of delimiting the border.'

Thirdly, the question of how citizenship is enacted through what people do is a recurrent theme in the *Handbook*. The imposition of laws or the supposed enjoyment of rights that have actually been eroded or never exercised make peoples' actions a major concern of citizenship studies. The growing body of academic scholarship on acts of citizenship is critically assessed at length by Guillaume, Ní Mhurchú, Nèveu, and Soguk. Examples of how citizenship rights are claimed through acts are provided by Alkan and Zeybek, Canals, Conway, Guild, Meltzer and Rojas, and Swerts. Alkan and Zeybek, Lee, Nèveu, and Rygiel all show in very different ways, that overtly political gestures of outward resistance are by no means the only kinds of actions that constitute acts of citizenship.

Finally, to capture something so intricate, multiform, and mutable it is helpful to think in terms of regimes of citizenship. As Guillaume notes in his chapter: 'The concept of regime of citizenship precisely enables us to understand citizenship in its necessary connected historicity but also interlinks it with other globalized phenomena.' At the point where identity as a marker of citizenship is ambiguous, the idea of regimes is useful. This is most obviously the case in supranational contexts such as European Union (EU) citizenship. To select only one example, Pullano illustrates how the nexus of EU-level and national institutions provides multiple sites in which EU citizenship can be enacted institutionally, which in turn produces differential spaces and frontiers within the European space. Yet, an important element of the concept of regime is that it prevents us from subsuming questions of legal status beneath struggles over the performance and practice of who can be a citizen. As Manby says: 'Statute law has sometimes been described as essentially irrelevant to the daily struggles of individuals to "belong" where they live; yet laws adopted by national parliaments nonetheless both reflect these struggles and have profound effects far from capital cities.' Moreover, the tension between competing legal regimes is a frequent aspect of citizens' struggles. This is seen most acutely when the presence of human rights becomes a channel for claiming citizenship rights, blurring the boundaries between the two (see Alkan and Zeybek, Ilcan, and Cirkovic). The concept of regimes is an example of how attempts to draw divisions between citizenship as status, as practices, or as enacted disguise the ways in which these are frequently interrelated (see Ní Mhurchú).

Historical formations and their critique

At first glance, surprisingly few of the chapters take Greek and Roman citizenship as their starting point, even for the purposes of critique. It is perhaps inevitable that a *Handbook* which exposes Euro-American bias and assesses the ways in which citizenship is being reconfigured and contested has only so much to say about the invented 'classical origins' of citizenship. The historicized vision of citizenship evoked and questioned by these chapters is decidedly modern and has three distinct but interwoven themes: the legacies of colonialism; the formation of the nation state; and Western twentieth-century social democracy as the basis for T.H. Marshall's model of citizenship.

Postcolonial legacies affect not simply peoples and states but also conceptions of how citizenship is bounded, conferred, and withheld. In the nineteenth and twentieth centuries British imperial citizenship, for example, offered the paradox of a supposedly universal access to subject rights, at the same time as a de facto exclusion based on constructions of race (see Manby, Reed and Rush), orientalism (see Banko) or ethno-linguistic markers of nationhood (see Lee). This aspect is explored in the context of post-Soviet Central Asia by Ruger. As Manby notes in the

case of postcolonial Africa, 'although the question of colonial borders was addressed... the related issue of how to treat the peoples cut in half by those borders, or individuals who had moved within the previous colonial territories, was not resolved (even on paper) in the same way'. And as Nyamnjoh and Brudvig, and Sanyal show, the promise of a city-hopping cosmopolitan citizenship is in practice seldom within the grasp of those racialized groups that colonialism perpetuated. Yet, in many contemporary states, the pretence of citizen equality has at times prevented the remedying of historic injustices colonialism has inflicted on certain groups of people such as the Scheduled Castes in India (see Jyall) or Aboriginal peoples (see Walters). In the mid-twentieth century, colonialism in many cases was replaced by foreign (i.e. Euro-American) backing for repressive governments, as in South Korea, the Middle East, and North Africa (see Moon and Ilcan). European settler colonialism led not simply to movements of populations to other parts of the world, but also to the creation of new states and thus new citizenship statuses to assert territorial sovereignty (see Abu-Laban, Walters, and Meltzer and Rojas). As Manby observes, vast colonial migrations continue to make the granting of citizenship a contentious and politicized issue in many African states. Anti-colonial struggles also constitute many contemporary citizen identities. This can be in a technical legal sense, where much political capital has been made of granting or withholding citizenship on the basis of participation in colonial struggles (see Dorman and Manby). As Conway notes, in South Africa the need for unity in resisting the apartheid regime marginalized the demand for gay and women's rights at the same time as benefiting from protest by these movements. In this sense, as Dorman and Sabsay among others remind us, colonial legacies have in turn been reshaped by subsequent political and social struggles. Lee's chapter alerts us to the ways in which citizenship itself is a concept that can carry with it not only colonial imposed norms but also the possibility of neo-colonial interference, exemplified by US foreign policy on the invasion of Iraq in the early 2000s.

While the decline of state power is a dominant theme, an equally common one is its resurgence, reconstitution, and resignification. The assertion of the legitimacy of contiguous mutually exclusive states brings with it certain historically derived assumptions about the role of the citizen in supporting such a claim. The granting or deprivation of citizenship rights and obligations is a central part of state-formation or of asserting the completeness or legitimacy of the state itself. Two chapters explore conscientious objection to conscription, one of the classic forms of obligation to the state. Protest over the citizen's right to conscientious objection become a site of contest over the legitimacy of the state's military aims and thus the state itself (see Alkan and Zeybek and Conway). Conscription exemplifies a common incongruity in citizenship as an institution, a universal obligation that only falls on certain members of the society – heterosexual men or 'whites', for example. In the same way, the public who deem themselves to have an interest in the state can be construed to include a broader international diaspora. Equally, the case of indigenous peoples frequently exposes citizenship status as a means for the state to assert territorial sovereignty. As Wiebe and Howell and Schaap show, if the conferring of national citizenship rights threatens to undermine indigenous peoples' claims to use and settle on their lands, they have little choice but to reject that status in order to assert their precedence over that state's claims to sovereignty. Hence, in 1972 Aboriginal protesters in Australia established a tent embassy (Howell and Schaap), and in 2012 an indigenous leader, Chief Theresa Spence, went on a 44-day hunger strike demanding state-to-state relations between her people and the Canadian government. In Africa, as Giraudo and Tamarkin note, the interstate roaming of indigenous peoples has been seen by many states as a threat to their sovereignty, as the internationally recognized rights and protections of such peoples can move with them across state boundaries. Thus Botswana has distinguished between indigenous people and autochthonous people, the latter supposedly being original to the state. In other words, to the extent that citizens are a marker of their state's

existence and its claims to sovereignty, the two concepts can, and frequently do, undermine as much as they reinforce each other.

Critiques of T.H. Marshall's model of citizenship reveal the inadequacy of a conception of such rights based primarily on the experience of Britain up to the social-democratic consensus of the mid-twentieth century. While Marshall's division of civic, political, and social rights was taken as a description to encompass the totality of citizenship rights, it was primarily conceived as a historically contingent, successive sequence of rights gained from the eighteenth through to the twentieth century in British history. It is the inappropriateness of this trajectory for other polities that is the basis of the critiques contained in this volume. The move beyond Marshall is a move beyond what is encompassed by the term and its geographical and historical specificity. Turner's contribution reminds us that Marshall overlooked the issue of minorities or of social difference more generally. This creates an obvious tension in wealthy former white-settler states where one might think Marshall's scheme would apply. As Abu-Laban observes: 'The mere existence of indigenous peoples in Canada, many of whom live on reserves and exercise a unique set of rights, challenges our conventional ways of thinking about citizenship through individual, civic, or (neo-)liberal models.' For Walters, the Marshallian model is the essence of what such states deny to indigenous peoples who supposedly enjoy such rights as citizens. As many of the chapters demonstrate, economic crisis and the neo-liberal restriction of the scope of social rights make the social-democratic model as anachronistic for 'the West' as for anywhere else. If this creates strains at a national level it also turns still emerging legal categories such as EU Citizenship into battlegrounds over social and civil rights (Gould, Kostakopoulou, and Pullano). As Abu-Laban, Dean, Guillaume, Levy, Pullano, and Sheller all convey, the crux of the issue is not simply the historical specificity of Marshall's concept: it is rather a vision of citizenship as something granted and fixed rather than embodied, enacted, or negotiated by would-be citizens themselves. But we can go further. As Dean suggests, abandoning the Marshallian model with social citizenship at its zenith allows for a radical reassessment of the place of the social. If the social is the site of negotiations and contestations, it not only precedes the civic and the political, as Dean argues, it is also the impetus for the excluded to demand civic and political recognition. As will be seen, the strong emphasis on citizenship constituted through struggle that permeates this book reflects this approach.

Traversing frontiers of citizenship

If the idea of citizenship as membership of a polity is not as coherent, contained, complete, and exclusive as it implies, there are two overarching reasons. First, if citizenship is membership of a polity, an individual must have multiple citizenship identities just as he or she is a member of several polities. The second is that, as Seyla Benhabib has observed, far from being a neat package conferred through membership, citizenship rights are increasingly disaggregated (Benhabib 2004). This leads to a series of analytical problems to do with the relationship between the citizen and his or her polity addressed at length in the *Handbook*, each of which is discussed in this section. These are: how the nation and the state coalesce (or fail to) in the citizen; how people express their belonging to a polity; how and why polities distinguish between citizens and foreigners or others; and how citizenship is enacted on the different scales and overlapping sites of multiple polities.

The question of who is and who is not a citizen is still too often decided by political instrumentalism. Nation-building campaigns can be a way of asserting a state's borders, a government's legitimacy, or a particular group's distinct rights. Such constructed identities can include elements that transcend the national. Perrin shows this using the example of the Arabization of

Berbers in Algeria or the granting of citizenship to children of native Arabic-speaking fathers (see also Assal and Manby). Increasingly, as Ragazzi and Ruget show in the case of the former Communist bloc countries and as Sutherland illustrates with the case of Vietnam, a state's attempts to build the nation through its citizenry can extend beyond national boundaries. Such moves create a deterritorialized citizenship, at odds with a general shift towards the postnational. The Indian government has at times reversed a trend towards acquiring citizenship through *jus soli* (birth), using *jus sanguinis* (descent) and even a religious element to exclude largely Muslim migrant populations from Bangladesh and accommodate low-caste Hindu migrants from Pakistan (see Javal). Ruget uses the case of post-Soviet Central Asia to highlight the limitations of ethno-linguistic definitions of nationhood, when citizenship rights are also shaped by large-scale migration, issues of minority inclusion, and major shortfalls in social, economic, and political rights. In Bosnia-Herzegovina, Cirkovic sees international efforts to enshrine a multi-ethnic nationhood through group rights to political representation as an anomalous contravention of basic human rights. As Martignoni and Papadopoulos show: 'The concept of integration in particular – based on a naturalization of borders – implies the existence of a coherent "subject of reception", a homogenous and close-knit social group that should receive, welcome "the other", and potentially integrate "otherness".'

If the construction of ethnic identities can be used by states to confer rights, it can also be a site for rights-claiming. Resistance to the category of foreigner is one of the most common examples of such a struggle (Shindo). As Hepworth, Ní Mhuirich, and Rygiel illustrate, claiming the right to have rights fundamentally subverts the notion of the foreigner as inimical to the citizen. Canals uses the idea of religious practice and dance to show how this can be done without accepting the logic of assimilation. Equally, Brudvig and Nyamnjoh use literature to convey the ways in which intimacy and conviviality can overcome such divisions in a world more frequently characterized by migration.

The scales on which people can be constituted are not simply a nested series running from the local, through the state-level, to the regional, and then the global. Dean observes that the 'conscious process of social accommodation surely preceded, and now transcends, the invention of the city (that bestowed on citizenship its etymological root) or the nation-state (that bestowed on it its modern form)'. Equally, as Wiebe and Latta and Witman illustrate, the citizenship practices and acts of indigenous peoples, particularly in relation to the environment, must not be recognized only at the point at which they interact, with or struggle against, the state. Nor should they be characterized simply as 'traditional knowledge'. Yet, national citizenship, too, has become increasingly deterritorialized in an effort to incorporate diasporic communities (see Ragazzi and Sutherland). Other trends also challenge the notion of a postnational world of cosmopolitan citizenships (see Dean and Lee). Sanyal contrasts the vision of a new urban India of international elites with the lived experience of those poor and marginalized city populations who are most affected by such projects. If the city is one example of an alternative polity to the state, the refugee camp as a site of humanitarian government is another (see Ilcan). Undoubtedly, European citizenship is the most legally sophisticated example of a supranational regime. As Maas observes:

no other continent has anything even remotely resembling a continental citizenship: the very limited additional rights that citizens of the United States, Canada, and Mexico have as a result of the North American Free Trade Agreement (NAFTA) or those granted to citizens of member states of Mercosur or the African Union, for example, pale in comparison with the extensive equality promised by a European Union citizenship that removes EU member governments' authority to privilege their own citizens over those from other EU member states.

EU citizenship is not simply one scale up from national citizenship. Nor does its derivation from member-state citizenship tell us much about how the enactment of each relates to the other. As Pullano puts it:

the tensions already existing in national citizenships between autonomy and equality, or between inclusion and exclusion, are not only still present in the European context, but they are taking up more complex and profound structures, since they involve the reshaping of national patterns of differentiation as well' (see also Tonkiss).

While it is clear that citizenship is frequently enacted on multiple scales, this necessitates a closer mapping of those different scales and their links rather than the presumption of a global or globalizing scale in all cases.

Understanding citizenship as struggle

As will already be clear, all of the chapters in the *Handbook* remind us that citizenship rights are not simply gained through struggle but constituted by it as an act in itself. Even understood primarily as status, citizenship is impermanent, capable of reconstitution, and therefore contestable. We are still left with the question of how to understand what is happening when struggles occur and what they produce. In different ways, many of the chapters affirm Dean's observation that we need 'a post-Marshallian concept of citizenship that is truly social; that centres on negotiation around human needs and social rights, and is not necessarily subservient to frameworks for constitutional civil and political order'. Constituting oneself as a citizen is not simply a question of accessing rights through pre-existing civil and political channels; more often than not, it is a response to the unavailability of such recourse. While all chapters suggest struggle is intrinsic to citizenship, four major struggles recur throughout the *Handbook*. These are: resistance to narrowly economic rationales for citizenship; the plight of migrants, particularly irregular or undocumented workers; the continuing struggle to address the unequal treatment of women in citizenship laws and persistent gender inequality; the worldwide flourishing of protest movements in 2011 typified by the so-called 'Arab Spring'.

Struggles can arise from the tension between a narrowly economic definition of citizenship and a wider basis founded on the social. Soguk defines this narrowness in terms of a cold economism that disproportionately burdens the most vulnerable members of society, as it exerts a ruthless biopolitical logic (see also Rygiel). Equally, Latta and Wittman show how struggles against corporate and state-led extractivism in South America reveal 'societal fault lines directly related to the uneven enjoyment of meaningful citizenship'. This is most apparent with regard to EU citizenship. As Kostakopoulou argues, the task is not to expand the scope of EU citizenship beyond its economic basis. Rather, it is to refute the premise that its foundations were not social. Mobility rights were, she argues, 'always intended to enable European workers to enjoy equal treatment not only in the workplace, but also in the broader social environment of the host member states and in the political arena'. This involves recognition of the social projects that have historically been integral to European integration (see Pullano and Maas). Moreover, as Tonkiss observes, it requires research and policy responses that acknowledges the impact such mobility has in terms of cultural and political integration into the life of host member states. As will be seen when we review coverage of the 2011 protest movements, a key element of understanding such struggles is recognizing that social justice is not only an underlying cause, but what ultimately gives them legitimacy as acts of citizenship.

One of the most extensively covered areas is how migrants claim their rights as citizens. This is more than the plight of non-citizens or those deemed to legally not have the rights they go

on to claim through struggle. All too often, migrants are vulnerable to being denied rights they legally possess. Within the European Union, Roma citizens of EU member states, have found the rights of mobility this confers upon them openly flouted by member-state governments (see Cirkovic, Maas, Pullano, and Vermeersch). As Tonkiss shows, the formal recognition of EU citizenship rights can belie barriers to belonging that EU migrants face in other member states. The implications of the EU border regime for so-called 'Third Country Nationals' are considered by both Guild and Rygiel. Canals uses the example of African-American identity for Venezuelans in Barcelona to illustrate how migrant communities can have their diasporic identities reconfigured in host countries. Methodological implications of understanding migrants' struggles in terms of citizenship are critically examined by Martignoni and Papadopoulos. The ways in which irregular or undocumented workers have little choice but to act as political subjects and demand the rights that they do not have are discussed by Hepworth, Ilcan, Lee, Rygiel, Soguk, and Swerts. Through such actions the legal status of citizenship expands to incorporate new subjects (Nyers 2003). In this way, the experience of migrants highlights the inherent possibility of recognition through struggle that is a key aspect of citizenship even as it excludes.

In many contexts, gender discrimination against women continues to be a common feature of citizenship. As legal status, it continues to enshrine discrimination against women in many nationality laws. Specifically, the slow decline of the practice of acquiring citizenship only through one's father (patrilineal descent) is discussed by Albarazi and Van Waas, Dorman, Manby, and Moon. Saeidi provides a nuanced account of the ways in which the regime of the Islamic Republic of Iran has restricted certain rights for women (such as access to certain professions) at the same time as depending heavily on women as political organizers and campaigners. The overarching question of how the citizen as a political subject remains gendered is discussed in the context of the Caribbean by Sheller. As Sheller shows, the category of citizen 'historically excluded women, dependents, slaves, former slaves, and servants, precisely because their bodies were stigmatized as overly sexual, emotional, and incapable of the higher rationality of disembodied objectivity, which was understood as a bourgeois, white, and heterosexual masculine trait' (see also Reed and Rush). Lee cautions that the apparent need to assert acceptable gender norms in terms of citizenship rights can frequently become a source of neocolonial interference.

When we conceive of struggle on a global scale, not confined to a specific national or other jurisdictional context, a number of questions arise. The first is what struggles across the world actually share in common. The power of common languages and action of struggle, rather than a deeper essential unity, is a theme taken up by Levy and by Martignoni and Papadopoulos. Howell and Schaap show how the black power movement in the US provided an inspiration and a possible political language for Aboriginal campaigners in Australia the 1960s and 1970s. The second question addressed in the *Handbook* is that of the legacies of the protests, street occupations, and other movements that began in 2011, typified for many by the 'Arab Spring'. Insights into the Arab Spring itself are offered by Kiwan and Perrin. Levy and Soguk provide analytical frameworks for linking the 15M movement in Spain, Occupy in North America and Europe, and events in North Africa and the Middle East. As Levy states, one must be sceptical of:

explanatory frameworks that left us misinformed on the possibility of a protest of this magnitude until the very moment of its eruption. Instead, it is time to focus on the actors themselves, to explore their vocabulary, and to listen to the words they weave into their actions.

In this sense, the events of 2011 and their repercussions remind us of the need to continually question and reassess what it is that we call citizenship.

The *Handbook* certainly demonstrates that citizenship as a concept is constantly being reconfigured. Historical and contemporary accounts show that struggles to be regarded under the label of citizen and to enjoy commensurate rights are what actually comprise citizenship itself. As the following chapters attest, only an interdisciplinary approach can capture and analyse such a dynamic. In the same way, thinking about citizenship globally necessarily involves working on multiple scales and investigating the connections between them. Referring to EU Citizenship, Kosakopoulou writes of its 'radical potential'. Conceivable only as the interaction of several polities and as something defined by the promise of what it can become as much as what it has overcome, EU citizenship is, in this sense, little different from the range of citizenships explored in the *Handbook*. As the different chapters show, the nexuses that make up the sites where citizenship occurs are so various that normative models derived from the historical experience of particular regions have become self-evidently inadequate. If the chapters prove that we cannot talk about a 'global citizenship', they also demonstrate that it is only at a global level that we can begin to appreciate that it is ultimately citizens who constitute themselves.

References

- All references are to chapters within the *Handbook* unless otherwise stated.
- Benhabib, S. (2004) *The rights of others: aliens, residents, and citizens*, Cambridge: Cambridge University Press.
- Isin, E.F. (2002) *Being political: genealogies of citizenship*, Minneapolis and London: University of Minnesota Press.
- Nyers, P. (2003) 'Abject Cosmopolitanism: The Politics of Protection in the Anti-Deportation Movement', *Third World Quarterly*, 24, 1069–93.
- Saïd, E. (1979) *Orientalism*, London: Vintage Books.