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Migration and the Political Rights of Foreign-resident European Citizens¹

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This paper examines the relationship between migration and the recent evolution of political rights in the European Union. At the same time that EU citizens who reside in a member state other than that of their citizenship have been enfranchised at the Union and local levels, foreign-resident European citizens are also gaining important rights of political participation in their 'home' countries. The paper surveys both the size of the foreign-resident communities in question and the forms of political enfranchisement they enjoy. A concluding section assesses the significance of this proliferation of political rights for thinking about migration, European integration and citizenship.

Migrations pose problems for prevailing theories of citizenship, which tend to assume a fixed political community whose members both reside within certain territorial boundaries and possess ties of citizenship to only one sovereign. This paper attempts to both describe and explain the evolution of citizenship regimes in the European Union with reference to contemporary migrations. In particular, it examines the recent proliferation of political rights accorded to foreign-resident citizens. In parallel with the establishment of EU citizenship, foreign-resident citizens of various European states are assuming similar positions within national citizenship policies. They are gaining rights of political participation in their country of citizenship (due to national policies) while at the same time gaining such rights in their country of residence (due to Union policies). This suggests that idioms of stateness, political community, and the scope of the political can transcend national boundaries even in policy areas where states retain full sovereignty.

As the defining characteristic of the state, citizenship has historically been regarded as unitary. One was a citizen of a single state and could not exercise membership in more than one political society. Since the state's sovereignty over its members was long regarded as mutually exclusive and tied to specific, bounded territory, there emerged an assumption that political identity is determined by geography—in other words, that one's residence determines one's political allegiance. This 'territorial assumption' caused political thinkers to regard migrations as one-time events—as immigrants move to a new country to remain there for the rest of their lives (Elkins, 1995). The assumption that citizenship is a function of a bounded, stable, and exclusive form of political community continues to inform political philosophy, and hence also issues of justice and community membership (Soysal, 1994). In this context, the main concern for political philosophers who address issues of migration seems to be the extent of assimilation or acculturation which can be requested or required of new citizens (Habermas, 1994). As the discussion below elucidates, however, the assumption of bounded political communities is (increasingly) empirically unsound. As long as the territorial assumption remained valid, individuals could simply be assumed to be citizens of the state in which they lived—or to be 'temporarily away from home' in the case of diplomats, traders and travelers. Foreign-resident citizens do not fit into this picture.

FOREIGN-RESIDENT EUROPEAN CITIZENS²

One of the first problems encountered in studying foreign-resident citizens is the lack of reliable data on the size and other characteristics of the communities in question. Part of this is a matter of unclear definitions. Do students studying abroad 'reside' in their host countries? Do temporary or seasonal workers? Should expatriates (those who have lost or renounced their citizenship) continue to be counted as 'nationals' abroad, or should the category be restricted to current citizens? The cases below examine the foreign-resident communities (generally defined here as residency of longer than one year by individuals who maintain their citizenship) of EU member states, focusing particularly on those who reside elsewhere in the Union.

[Insert Table I about here]

Austria

There are approximately one million *paßösterreicher* (those with Austrian passports) and *Herzösterreicher* (Austrians by heart) abroad, but the proportion is unclear. Net emigration of Austrian citizens averages approximately five thousand annually. The number of Austrians temporarily working in Switzerland (27,100 in 1997) and Germany (nearly 75,000) has been declining, largely accounted for by falls in the number of seasonal and border workers (SOPEMI, 1999:97-102). The *Weltbund der Österreicher im Ausland* (World Association of Austrians living abroad) regroups the more than 100 Austrian associations in more than twenty countries (Council of Europe, 1994:4). As Table I indicates, there are over 211,000 foreign-resident Austrians in the EU. The overwhelming majority of these reside in Germany (87%), with the UK (4%) and Italy (2.6%) trailing far behind.

Belgium

Estimates of the number of Belgian citizens living abroad vary widely. One source affirms that about one million Belgians live outside Belgium, including about 600,000 Flemings who are mainly resident in the United States, Canada, Argentina, South Africa, Indonesia, central Africa and eastern Europe. However, another estimate puts the number at approximately 500,000, of whom only 155,000 are registered with Belgian consulates abroad (Council of Europe, 1997:26). The number of Belgian emigrants has been increasing since 1992. Coupled with a decline in the number of emigrants who return, net emigration of Belgian nationals continues to increase, maintaining a trend that has been unbroken for over twenty years. In 1997, net emigration of Belgian citizens reached approximately 8600 (SOPEMI, 1999:108-10). Table I affirms that there are some 138,000 Belgians living in other EU member states. Proximity and linguistic factors seem to play a large role in destination choice, since this population resides primarily in France (41%), the Netherlands (18%), Germany (17%) and Luxembourg (9.5%). The organization *Vlamingen in de wereld* (Flemings in the world) assumes that politicians will show no interest in foreign-resident citizens until those who have emigrated are given voting rights for the European Parliament, their national parliaments and their local authorities. In line with the position taken by *Vlamingen in de wereld*, the Belgian Cabinet has recently proposed plans to allow foreign-resident Belgian citizens to vote for elections to the federal Parliament. This development fits with the governing coalition's commitment to study the situation and concerns of Belgians living abroad (Belgium, 1998).

Table I: Distribution of Domestic and Foreign-resident Citizens in the EU

	Austria	Belgium	Denmark	Finland	France	Germany	Greece	Ireland	Italy	Lux.	Neth.	Portugal	Spain	Sweden	UK	Total f.r.
Austria	7341085	1686	719	152	3280	184500	1447		5594	500		422	1794	2693	8700	211487
Belgium		9289144	484	83	56129	22900	1210		4757	13200	24400	1672	8278	505	4900	138518
Denmark		3324	5045232	476	3544	20500	1262		1981	2000		675	4539	25388	13100	76789
Finland		2307	2096	5036742	1552	14800	955		1233	620		436	2341	101333	3800	131473
France		103563	3011	462	53055353	99100	5088		25262	16530		5416	28513	3716	59200	349861
Germany		33320	11873	1613	52723		9370		32764	10020	53900	8345	38229	14467	61600	328224
Greece		19216	653	243	6091	359600	10325447		11388	1250	5300	96	596	4413	21400	424946
Ireland		3336	1094	126	3542	15700	510	3509100	1955	930		353	2557	931	443100	474134
Italy		205782	2592	486	252759	586100	5571		56576423	19890	17400	2195	17989	4123	81900	1179387
Lux.		4480	16	6	3040	5500	37		239	276000		60	144	24		13546
Neth.		82300	3821	371	17881	113100	2747		6508	3810	14768468	3149	12123	3117	29200	278127
Portugal		25276	495	86	649714	125100	248		4184	54490	8700	9782007	34943	1369	26300	922205
Spain		47415	1563	365	216047	132300	673		12277	2910	16600	9806	38708873	3025	33700	460081
Sweden		3946	10036	6685	4805	16800	1798		2684	860		1076	5427	8325576	18400	72517
UK		26095	12771	1747	50422	115800	14104	71600	22685	4400	39200	12348	62317	11711	56057900	406000
foreign: EU	86800	562046	51224	42541	1321529	1627300	45020	88000	133512	131410	191074	46049	219790	176815	805500	
non-EU	647540	341074	198404	19471	2275073	5502200	116128	29000	751043	16290	534347	129214	240976	345234	1321400	
Total For.	734340	903120	249573	62012	3596602	7314000	161148	117000	884555	147700	725421	175263	460766	522049	2120600	
Total	8075425	10192264	5294860	5098754	56651955		10486595	3626100	57460977	423700	15493889	9957270	39169639	8847625	58184800	

Note to editors / reviewers: These statistics were compiled from various sources, and may be updated. Although every effort is made to ensure the compatibility of the data, the final version will include notes on the sources.

Denmark

Emigration of Danish citizens is more or less balanced by return migration and by immigration of Danish citizens from Greenland or the Faeroe Islands: both average between twelve and thirteen thousand annually, although emigration is increasing while immigration and return migration are decreasing. Some 100,000 Danish citizens live in other EU/EEA states (SOPEMI, 1999:128-9) (Council of Europe, 1997:26).³ The political rights of these Danish citizens and their compatriots elsewhere abroad are restricted by the Danish Constitution, which states that the franchise is restricted to adults holding Danish citizenship and permanently residing in the realm (Denmark, 1996:23). In 1995, the Local Government Election Act was changed so that citizens of other EU countries and citizens of the other Nordic countries possess voting rights, including the right to stand as a candidate, with no minimum residence requirement other than the 22-day requirement to which all voters are subject. Citizens of other countries have a three-year residence requirement before they, too, possess the right to vote and stand as a candidate in municipal elections (Denmark, 1996:25). This residency requirement is specified in the Folketing (Parliamentary) Election Act and the Local Government Election Act, which cover national and local voting rights respectively and stipulate that only voters who are 'permanently resident' in Denmark possess the right to vote (Denmark, 1994:3-4). Although the constitution seems to preclude all political participation by foreign-resident citizens, the interpretation of the residency requirement has gradually changed. Since 1970, employees of the Danish state working abroad have been considered to fulfill the requirement of 'permanent residency'. In 1980 the constitutional reading was further expanded in such a way that citizens working abroad for Danish companies, those working in international organizations of which Denmark is a member or in Danish aid agencies, students studying outside Denmark, and citizens living abroad for health reasons—as well as their spouses—are all considered to have fulfilled the residency requirement. The one provision is that their residency outside Denmark not exceed 12 or 13 years; in cases of doubt, the aptly-named Franchise Board renders a ruling (Denmark, 1996). Thus this interpretation of the constitutional requirement has enlarged the category of Danish citizens residing abroad who can vote. In 1994, there were 6172 voters living abroad, 0.2 per cent of the total electorate. Information on participation rates by these voters is not available. However, the voting procedures are not easy for potential voters. Voting on election day itself requires the presence of the elector at his or her municipality's polling station in Denmark. Those wishing to vote abroad must appear in person at a place where advance voting can be performed: a municipality in Denmark, a Danish embassy or consulate, or a Danish ship.⁴ If all procedures are correctly followed, then the completed ballot is mailed to the municipality in which the voter is registered as a resident; it must arrive before election day to be counted. The fact that elections can be called with only three weeks' notice does not simplify the planning process for Danes abroad residing far from a diplomatic office. Danish citizens living in any EU country as well as citizens of other EU countries resident in Denmark possess the right to vote in the quinquennial elections to the European Parliament. Since Greenland and the Faeroe Islands are not part of the EU, however, their inhabitants do not have the right to vote in these elections. Furthermore, since Danish citizens who are not 'residents' of Denmark are constitutionally restricted from voting, Danish citizens who reside neither in Denmark nor in another EU member state are constitutionally prohibited from voting in European Union elections, which appears to contradict EU law.

Finland

There are approximately one million Finns resident abroad (Council of Europe, 1997:26), but this number includes both foreign-resident and expatriate communities. Only those who maintain their Finnish citizenship are eligible to vote in parliamentary, presidential and European Parliament elections.⁵ It is one of the tasks of Finnish embassies and consulates abroad to arrange possibilities for them to vote. As in other countries surveyed, Finland has a system of mail voting, whereby voters seal their votes and deliver them to post offices or embassies, which send their sealed voting clips to the local constituencies, where they are counted in a normal way. In the parliamentary elections of 1995, the number of foreign-resident Finnish citizens with the right to vote was 205,697. Of that number, only 12,474 (6.1%) utilized their right. The largest number of these votes came from Sweden and other Nordic countries, but votes from Finns living in the other EU member states have been increasing. Immigration of Finnish citizens averages some five thousand annually (5400 in 1997) while emigration tends to be two to three thousand more (8300 in 1997)(SOPEMI, 1999:132). Table I indicates that most foreign-resident Finnish citizens in the EU reside in Sweden (77%), followed by Germany (11%). One of the difficulties for foreign-resident Finnish citizens concerns the issue of dual nationality, which the government does not currently permit. Various groups of foreign-resident Finns (both current citizens and expatriates) have been lobbying the government to ease this restriction.

France

Approximately 1.8 million French citizens reside outside France and its territories, roughly two percent of the total population of French citizens. Of this group, approximately half live in other EU member states; a similar proportion possesses another nationality besides French. The countries with the largest population of French citizens are the United States, the United Kingdom, Germany, Belgium, Switzerland, Canada, Spain and Portugal (Durand-Chastel, 2000). Table I indicates that there are some 350,000 French citizens resident elsewhere in the EU. The fact that this number is so much lower than the French government's estimate is likely due to the high proportion of foreign-resident French citizens who adopt their host country's citizenship and hence cease to appear on the Eurostat data. The formal, direct political representation of foreign-resident French citizens dates from 1976. Since then, polling stations have been set up at certain consular offices, enabling French nationals to take part in person in presidential and European parliament elections and in referendums. It is also possible to participate in municipal elections through the use of a mail-in ballot. In addition to these direct forms of political participation, French citizens residing abroad can participate indirectly in French politics through the Conseil supérieur des Français à l'étranger (CSFE). This council, chaired by the minister of foreign affairs, is composed of 150 members elected by French citizens resident abroad, one representative of French citizens resident in Andorra, 20 individuals appointed by the foreign ministry and 12 senators elected by the other members. It is important to stress the position of these twelve Senators. The French Senate, composed of 321 Senators, includes explicit recognition of citizens resident abroad by stipulating that only 'résidents de l'étranger' can select these parliamentarians. As is the case with other members of the Sénat, the Senators representing French citizens abroad serve six-year terms, with one third coming up for election every two years. In terms of social programs, French citizens living abroad can elect to benefit from health, accident and employment insurance, as well as maternity and retirement benefits at the same level as residents of

France through the Caisse des Français de l'Étranger. Representatives of the CSFE govern this body with the assistance of government ministries. The possibility of extending coverage to those temporarily working abroad was first established in French law in 1965, and the Caisse itself was not created until 1978. The Caisse can provide a significant boon to those intending to retire in France or to benefit from their French citizenship, yet its operation is not without problems; adherence to the Caisse does not satisfy the requirements for universal social programs in place in many other jurisdictions, particularly in other EU member states. In other words, French residents of many other EU states are required to make mandatory social programs payments in their home country, regardless of whether or not they belong to the Caisse. As a consequence, the majority of those citizens choosing to insure themselves with the Caisse reside in Africa, Latin America and Asia (Cantegrit, 2000). In addition to the provisions of the Caisse, the ministry of foreign affairs administers funds to aid French citizens abroad in dire need of assistance; such funds annually count between five and six thousand beneficiaries. In terms of education, the French government, through l'Agence pour l'Enseignement Français à l'étranger, administers a network of over 400 schools worldwide. Approximately 6000 teachers qualified to teach in France educate the 210,000 or so students who attend French schools abroad. Roughly one third of the student body is composed of French citizens and the government directly pays for the education of almost 20,000 of these students. Such efforts underscore the importance of education to efforts aimed at nation-building and creating a national citizenry (McNeely, 1995:117). Through these various institutions and programs, the government actively encourages French citizens to move abroad while maintaining ties with France. Law no. 97-1027 (November 10, 1997) provides for the automatic enrolment of all French citizens who attain the age of majority (18) on the electoral list in their home community in France. The law is currently being modified to apply also to French citizens resident abroad, so that they too will be automatically inscribed on the electoral list.

Germany

Pointing to their lack of political importance, no reliable statistics on the number of German citizens living abroad were available for a long time. "Even the German Foreign Office was unable to determine the number of persons with valid German passports living abroad when a survey of German embassies was carried out in preparation for the 1987 general election" (Council of Europe, 1994:11).⁶ Since the political restructuring in Eastern Europe and the former Soviet Union, liberal legislation allowing ethnic Germans living abroad (*Aussiedler*) to acquire German citizenship as soon as their national origins are recognized has been responsible for large-scale immigration of Germans into Germany, since *Aussiedler* are considered nationals in migration statistics. Net migration of German citizens jumped sharply in 1988 and 1989, reaching a peak of over three hundred thousand in 1990. Since then, immigration has decreased as inflows of *Aussiedler* have declined (SOPEMI, 1999:141-5). Table I indicates that the UK (19%), the Netherlands (16%), and France (16%) are the most important places of abode for the 329,000 or so German citizens residing elsewhere in the EU. Germans resident abroad were enfranchised at the federal level in 1985, but only under specific circumstances. In order to be eligible to vote, German citizens must have resided in Germany continuously for at least three months before leaving the country. If they qualify by having lived in Germany continuously for at least three months, Germans resident in Europe or Russia⁷ have the right to vote irrespective of the length of time they have lived abroad. Those

citizens residing elsewhere lose their right to vote ten years after their departure (Germany, 1998a; Germany, 1998b).

Greece

The National Statistical Service stopped collecting emigration data in 1977, but it is clear that the once substantial migrations to the United States, Canada and Australia are now insignificant. These destinations have been replaced by Germany. Yet, although 16,400 Greek citizens left Greece for Germany in 1997, another 21,700 Greek citizens emigrated from Germany that same year, presumably to return to Greece. Parallel with this return migration, the once considerable remittance payments from foreign-resident Greeks appear to be dwindling. Approximately 150,000 non-Greek citizens resident in Greece are of Greek ethnic origin. In a similarity with the German *Aussiedler*, the migration of ethnic Greeks from the former Soviet Union (Greek Pontians), which peaked at almost 14,000 in 1990, has since been decreasing and reached 5000 in 1997. The Greek government pursues policies aimed at encouraging the Greek Pontians to remain in their countries of residence while at the same time building cultural and political links with Greece (SOPEMI, 1999:147-9). Table I illustrates that there are some 425,000 Greek citizens residing in other EU member states. A substantial majority of these (85%) reside in Germany.

Ireland

Ireland's citizenship laws allow many people with few recent ties to Ireland, primarily second and third generation emigrants, to claim Irish citizenship. Ireland's population of approximately 3.6 million (including some 91,100 foreigners) is dwarfed by the size of the Irish diaspora. There are approximately 50 million people of Irish origin world-wide (including approximately 40 million in the United States of America alone). The number of Irish citizens residing outside Ireland is significantly smaller, at some 3 million. Of those, only approximately 1.1 million were born in Ireland (Council of Europe, 1997:26). The fact that the population of foreign-resident Irish citizens is almost equal to the number of Irish citizens living in Ireland helps explain why Irish electoral law places drastic restrictions on voting from abroad. Perhaps because Ireland is quite liberal with regards to who can qualify for Irish citizenship, the right to participate politically by voting in elections is closely guarded. Net outflows were quite high in the late 1980s, reaching 45,000 in 1988/89 (1.3% of the population). Though it is no longer the dominant destination (in 1989, nearly 70% of Irish emigrants moved there) the United Kingdom remains the most important destination for Irish emigrants. In 1998, 40% of emigrants moved to the UK, compared to 20% other EU member states, 20% to the United States, and 20% to the rest of the world. By the early 1990s, the migration balance was neutral, and immigration has recently outpaced emigration. Census estimates based on 1991 data indicate that no less than 30% of the population aged over 40 years and possessing advanced degrees had resided outside the country for at least one year. The corresponding rate for the adult population as a whole (25 years and over) was 10% (SOPEMI, 1999:155-9). As Table I indicates, however, the recent evolution of the migration patterns has yet to significantly affect the proportion of Irish citizens resident in the UK compared to those resident elsewhere in the EU: nearly 94% of foreign-resident Irish citizens living in the EU reside in the UK; only 6% reside elsewhere, with Germany (3%) being the second most important destination.

Italy

Italy is another country with a large population of citizens who reside abroad, though the proportion is not as skewed as that of Ireland: the number of ethnic Italians resident abroad is estimated at 30 million, about half the domestic population. Some 3.5 million of these have registered with consulates (Council of Europe, 1997:27). The second national conference on Italian emigration held in Rome in 1988 attracted some 2000 delegates, including 1400 elected by Italians resident abroad within the framework of the emigrants' committees (COEMITS) established in 1985. These delegates represented an estimated five million Italian migrants who have maintained Italian citizenship. One major proposal to emerge from the conference concerns the establishment of an advisory committee to represent the interests of Italians resident abroad. In 1991, Parliament passed a law creating a register of Italians living abroad and providing for a census. Italians represent the largest single group of foreign-resident citizens within the EU. As shown in Table I, other EU member states report some 1.2 million Italians living within their borders. However, this number does not include dual nationals. An Italian-French dual national resident in France, for example, would not appear as a foreigner resident in France. Since Italy allows dual citizenship, the number of Italian citizens resident elsewhere in the EU can be expected to be higher than the 1.2 million reported.

Luxembourg

Luxembourg's resident night-time population is approximately 412,800, of whom 132,500 are foreigners. However, the population increases during the day, as almost one third of the workforce commutes across borders. Luxembourg maintains no census or estimate of the number of Luxembourgers abroad, but there were 30,000 foreign-resident voters in the 1994 general election (Council of Europe, 1997:27). The data in Table I indicate that there are almost 14,000 Luxembourgers resident elsewhere in the EU, with Germany (40%), Belgium (33%) and France (22%) accounting for the vast bulk of that number. Due to the high number of non-Luxembourg EU citizens residing there, Luxembourg obtained special provisions regarding the right to vote in municipal elections. The citizenship provisions of the Maastricht Treaty extended such rights to all EU citizens, regardless of their place of residence in the EU. Luxembourg's Act of 28 December 1995 establishes the procedures by which this citizenship right can be exercised within the Grand Duchy.

Netherlands

Immigration of Dutch citizens (primarily from the Dutch West Indies) has recently been increasing, particularly due to the strong Dutch economy and the weak conditions in the Caribbean constituents of the kingdom. However, these inflows do not yet balance outflows. SOPEMI (1999) figures show that immigration of Dutch citizens averaged some 31,000 annually from 1994 through 1997, while emigration averaged some 41,000. Emigrants outnumbered immigrants by some 8500 in 1994, 12500 in 1995, 11300 in 1996, and 7200 in 1997. There are government programs underway to encourage the expatriation and emigration of Dutch citizens of Surinamese and West Indian origin. The data from Table I indicate a modest population of some 280,000 Dutch citizens resident elsewhere in the EU. Germany (40%), Belgium (29%), the UK (10%), France (6%) and Spain (4%) account for most of this number. Foreign-resident citizens may vote in national elections for the lower chamber of Parliament but are precluded from participating in municipal or upper chamber elections.

Portugal

By the early 1990s there were more than 4 million Portuguese living outside Portugal, and the Portuguese government was "interested in maintaining the cultural and linguistic identity of Portuguese living abroad"(Council of Europe, 1994:18). More recent data (SOPEMI, 1999:191-94) indicate that this number has increased to 4.6 million, more than a quarter of whom reside in Brazil. The next most important countries of residence are France, the United States, Canada, Switzerland, Germany and Luxembourg. Table I indicates some 923,000 Portuguese citizens resident elsewhere in the EU. The Portuguese government claims the slightly higher figure of one million which, given the fact that Portuguese citizens have been able to enjoy dual citizenship since 1981 (and thus would not be counted, if they have adopted the citizenship of their country of residence), appears to be a realistic and perhaps even somewhat modest assessment. Approximately 37,800 Portuguese emigrated in 1997, including only 8800 women (23%). An estimated 14,700 Portuguese citizens immigrated that same year, resulting in a net outflow of some 23,100, a figure that is higher than other recent years. Foreign-resident Portuguese citizens directly elect members of Parliament. The government encourages emigrants to integrate into their host country while maintaining the Portuguese language and other links to Portugal. A 1996 law established the Council of Portuguese Communities, an advisory body composed of 100 elected members (SOPEMI, 1999).

Spain

Since registration with Spanish consulates abroad is voluntary, there is no systematic census of Spaniards living abroad. Nevertheless, a calculation based on consular registers estimated the number of Spanish citizens living abroad as of January 1, 1990 at 1.7 million, while almost 1.2 million Spanish citizens were actually registered as living abroad in 1997 (Council of Europe, 1994:19; Council of Europe, 1997:27). Therefore, some four per cent of all Spanish citizens reside outside Spain. According to the Directorate-General for Migration, emigration (primarily workers from Andalusia who emigrate on a temporary basis to France, Belgium and Switzerland) has decreased considerably since 1995 while the number of Spanish citizens returning to Spain has been increasing. Thus some 27,500 names were struck from consular lists in 1997, compared to 20,600 in 1995. Nearly two-thirds of these returns were individuals previously residing in other EU member states (primarily the UK, Germany and France) or Switzerland (SOPEMI, 1999:204). Table I indicates some 460,000 Spanish citizens resident elsewhere in the EU. Most of this population resides in France (47%), Germany (29%), Belgium (10%), or the UK (7%).

Sweden

Every person resident in Sweden must be registered in the population register, maintained by the National Tax Board. Those who leave the country to take up residence elsewhere for more than one year are deregistered. To cater to Swedes abroad, the government maintains Swedish schools in about forty cities outside the country. Furthermore, state subsidies are available for Swedish families resident abroad who wish to send their children to boarding school in Sweden. There are a number of private organizations established by emigrants, including local friendship groups (such as the Swedish-Dutch association) and organizations such as Sweden in the World. One of the main organizations for Swedes abroad is the Church of Sweden Abroad, which has a network of some 45 churches worldwide. Church personnel visit Swedish citizens in hospital or

prison abroad, and also cater to the large communities of Swedish pensioners in such cities as London, Berlin and Paris. Voting from abroad was introduced relatively early with the Parliamentary election of 1968. Citizens resident abroad can participate only in Parliamentary elections, not county or municipal elections. With the introduction of an elected European Parliament, Swedish citizens residing abroad also gained the right to vote for Swedish Members of the European Parliament. For many years, the Election Act stipulated that Swedish citizens abroad could participate only if they had emigrated less than a decade prior to the election. This requirement was later made more restrictive; in order to be eligible to vote, citizens were required to have been resident in Sweden at some point during the preceding seven years. In 1976, however, the requirement was abolished, and all Swedish citizens over the age of majority who were once registered as residing in Sweden gained the right to vote. As of August 1998, there were roughly 70,000 eligible Swedish voters abroad. More than half live in other European Union countries, primarily in the United Kingdom (6432), Germany (4991), Denmark (4499), Spain (3701), France (3522), Finland (3383), Greece (2525) and Belgium (1735). Another 12,180 potential voters reside in Norway, and 2766 live in Switzerland. In terms of logistics, voting abroad is still carried out in the same manner as in 1968: in person at Swedish embassies or consulates. In 1982, the possibility of voting by mail-in ballot was extended to Swedish citizens residing in Germany and Switzerland. In the past, it was necessary to apply beforehand in order to be allowed to vote. Of the 21,565 eligible voters who applied to vote in the 1994 Parliamentary elections, only 16,632—slightly more than three quarters of those who had applied, and only about one quarter of all eligible voters—actually exercised their right. The 1998 elections were the first ones in which this requirement to register beforehand was lifted. Except for Swedish citizens in Germany and Switzerland who could opt to use mail-in ballots, however, all those wishing to vote were required to travel to a Swedish diplomatic mission to do so.

United Kingdom

The number of British citizens living outside the United Kingdom is approximately 11 million (Council of Europe, 1997:27). Commonwealth citizens resident in the UK still enjoy voting rights, and the British government has historically been quite supportive of those wishing to adopt a new nationality while retaining their British citizenship. Inflows of British citizens were higher than outflows in 1994 (118,000 compared to 108,000) but the two have shown an inverse trend, with outflows outpacing inflows 131,000 to 97,000 in 1997, for a net emigration of some 34,000 British citizens (SOPEMI, 1999:219). The data in Table I indicate that relatively few foreign-resident British citizens in the EU. The 406,000 who live in other EU member states are quite widely distributed: the bulk reside in Ireland (18%), Spain (15%), France (12%), the Netherlands (10%), Belgium (6%), or Italy (6%).

ENFRANCHISING EMIGRANTS

Political rights are a key component of modern citizenship and have in many ways defined the democratic state. Democracy assumes a political community, and citizenship is a means of delineating who does and who does not belong to the political demos. Thus a citizen is a full member of a political community, as distinguished from a foreigner or others not entitled to its franchises. Historically, political community was limited by geographic borders; until very recently, political participation has always been territorially defined. Politics was situated in a spatial hierarchy ranging from city to region to state, as

the idea of political community was enmeshed within assumptions of territoriality and exclusivity. Almost entirely absent from this picture were citizens residing outside the borders of the state, as well as the curious category of dual citizens—those with legally-recognized ties to more than one polity. Though the notion of dual nationality has been declared by many scholars to be theoretically impossible and practicably untenable (Aron, 1974), the number of dual and even multiple citizens is increasing. This development complements the recent extension of the franchise to the ‘geographically challenged’—citizens not physically present within the boundaries of their state of citizenship.

While mobility has been increasing and barriers to voting from abroad have been decreasing, political participation by foreign-resident citizens generally remains much lower than that of their domestic counterparts. The individual’s direct, geographic ties to the state in which he or she lives still seem to be the prime determining factor for political activity. On the other hand, political activity across borders is growing. In Europe, increasing numbers of people can and do participate in—and exercise the rights and duties of—more than one political community (Meehan, 1993). The notion of political identity being irrevocably tied to geography has been shattered by the emerging reality of mobile individuals. The recognition of such plural citizens necessitates a re-evaluation of the concept of citizenship. In addition to the ‘borderless’ movements of capital, goods and ideas, people too have begun to move around to a much greater extent than was generally true in the past. Large groups of communities of citizens resident abroad have been established whose members fully participate in the politics of their country of residence while at the same time sustaining connections to their country of citizenship. In many cases, they have access to dual citizenship—to full legal recognition as members of the political community in more than one jurisdiction.

Central here is the question of migration. Of course, migration has long affected state autonomy, and the challenge which migration sets for concepts of citizenship and nationality is too often treated as contemporary (Cesarani and Fulbrook, 1996). But contemporary migrations differ fundamentally from previous patterns in that individuals can much more easily maintain ties with a society of origin when they move. Modern transportation and communications technology renders it easy for people and ideas to move, and the new challenge for some is not integration within societies, but between them (Laguerre, 1998). There is no conceptual problem from the standpoint of traditional citizenship theory as long as mobility is restricted to movement within states, or as long as movements between states are assumed to be permanent, involving a loss of ties to the society of origin and their total or near-total replacement by ties to the new society. The fact of people moving between political communities and maintaining ties with two or more jurisdictions requires reevaluating traditional theories (Scott, 1998). As this paper has shown, many European states are extending political rights to their citizens who reside abroad at the same time as EU citizens resident within their boundaries are being enfranchised. These empirical developments should give rise to new theoretical work on the relationship between migration, European integration and citizenship.

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² Except where otherwise noted, statistics are drawn from responses to surveys sent in mid-1998 and returned to the author by national authorities. Response time varied widely among returned surveys (about half the sample), as did the level of information provided. Statistics reported by national authorities sometimes differ from those derived from Eurostat data, as discussed in the individual cases.

³ The largest group of people of Danish origin resident outside Denmark is the 50,000 or so living in Schleswig-Holstein. The Danish Frontier Association, with some 45000 members, actively promotes the interests of the Danish community in Schleswig-Holstein (Council of Europe, 1994). As Table I indicates, there are some 20,500 Danish citizens resident in Germany.

⁴ Advance voting abroad can also take place with a 'vote receiver', especially appointed by the Ministry of the Interior. This provision is generally used to serve Danish military personnel abroad.

⁵ Citing practical difficulties such as the different candidates in every one of the roughly 440 communes, the government prohibits foreign-resident Finnish citizens from voting in local elections. However, the foreign ministry acknowledges that "for quite many Finns the possibility to vote is an essential element of their national identity. It is therefore important that they have an opportunity to use this right."

⁶ However, there is a *Verein für des Deutschtum im Ausland* (Association for German Culture Abroad) which issues publications and supports research on the subject of Germans abroad.

⁷ The Federal Electoral Law refers to Germans resident in a member state of the Council of Europe, which includes Russia and other former Soviet states.