Regimes of Toleration in Nation-States and in Consociations: The Recognition of Ethno-Cultural Diversity and Its Dilemmas in a Globalized World

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ABSTRACT

The paper will analyze diverse politics of recognition in and beyond European societies, that is in plural societies such as those in Southeast Asia. It will endeavor to show that despite their considerably disparate historical experiences, practically all the diverse types of governance of multiculturality in a globalized world have a wide range of problems in regards to a decent recognition of ethno-cultural diversity. The comparison intends to highlight in particular that the European political agenda (rather liberal-oriented) cannot be exported to plural societies just as the political agenda of plural societies (rather communitarian- and consociational-oriented) cannot be transposed tout court into other societies. The analysis of the empirical data in the article based on the method of comparison by contrast (thus not comparison by affinity), which also challenges the simplistic soundness of universalistic models of interpretation. Finally the article intends to show the relevance of the comparative method elaborating differences but also family resemblances (following Wittgenstein's terminology).

INTRODUCTION: REGIMES OF TOLERATION AND POLITICS OF RECOGNITION

Political theorist Michael Walzer is certainly the only researcher who better than others has presented a pragmatic and inclusive ty-

pology of various forms of recognition of cultural/ethnic diversities based on the principle of *toleration* (Walzer 1997). Within this aspect, Walzer distinguishes between *tolerance* as an attitude, stance or, in sociological terminology, a social representation and *toleration* as an empirically detectable practice (*Ibid.*: XI). Only *toleration* allows for distinction (in our case, cultural) and recognition.

Walzer has developed five types of political communities and States in which rather different *regimes of toleration* may be observed. In this article we will empirically analyze different *regimes of toleration.* To this end we have opted for two currently relevant types expressly mentioned by Walzer, that is the Nation-States, widespread in Europe, and the consociations present in several post-colonial States in Southeast Asia. The purpose of this choice is to show via specific cases that the *politics of recognition* (Taylor 1992) of ethnic and cultural diversity on which every *regime of toleration* is based is not a simple or self-evident process without any challenges. On the contrary, tensions, dissents, exclusions, discriminations and at times also conflicts, together with negotiations, talks and compromises characterize the various *politics of recognition* and the different *regimes of toleration* both in the Nation-States and in the consociations. The present article is characterized precisely by this disenchanted anthropological outlook that aims at corroborating Walzer's philosophical pragmatism.

POLITICAL EUROPE: A GALAXY OF NATION-STATES SHARING THE MYTH OF A MONOETHNIC TERRITORY

Europe's current political layout is still based in the main on Nation-States fiercely protective of their sovereignty, though the latter has been slightly limited lately by regionalist and autonomy demands. This political layout is the outcome of the proliferation of such States at the end of the 18th century and thereafter, and of the project to establish a *Europe of nations* as theorized and solicited by the then president of the United States, Thomas Woodrow Wilson, in the aftermath of World War I.

Nation-States, which we must keep in mind still determine Europe's political order, were established mainly by means of two models, first conceived in France and second in Germany. Clearly

enough, in this article these models are taken into consideration as Weberian ideal types.

The French Model

It has often been remarked that the French model of national State is based on the idea of *political nation*. According to this widespread opinion, the national State would be the outcome of a *political agreement* or, better yet, of a pact, that is a *contract* between its citizens. On the subject, Jules Renan has spoken, somewhat rhetorically, about the nation, thus about its political organization, as *un plebiscite de tous les jours* (a daily plebiscite). This well-known formula highlights that the *political nation* of French derivation is an elective community, implying the existence of a *patrie ouverte* in which religious and/or ethnic-related differences are irrelevant (Dumont 1991: 25). Under this aspect, the national State represents the outcome of a declaredly voluntary act of each citizen that mirrors the viewpoint expressed by baron Charles de Montesquieu in his *pensées*, for whom *Je suis nécessairement homme... et je ne suis français que par hazard* (By nature I am a man... by chance I am French) (Montesquieu 1949: 10).

Nowadays we are aware that the non-ethnic concept of nation that stemmed from the French Revolution was markedly modified and relativized rather soon, since it was merged with ideas that were not utterly devoid of ethnicizing tendencies. The French experts who have delved into this matter point up that, according to the 1791 and 1793 constitutions, any foreigner living in France could be granted citizenship without having to prove that he had acquired a French identity. In plain words, this meant that obtaining citizenship came before obtaining nationality, so before acquiring that sum of cultural stances and social rules regarded as typically French (Weil 1988: 192; 2002; Weil and Hansen 1999; Lochak 1988: 78). The sequence *citizenship-nationality* was all but reversed in the course of the 19th century. This fundamental shift occurred together with and was justified by the introduction of further ethnicizing concepts by which the prerequisites to belong to the elective nation and its State were increasingly defined by ethno-cultural criteria, such as knowledge of the French language and the acquisition of the way of life specific to the country.

Though weakened, the original idea of *citoyenneté* was never totally set aside. In particular, the *subjective*, thus individualistic vision of the nation (Sundhaussen 1997: 79), by which any foreigner living in France can take advantage of the apparently trouble-free mechanism of assimilation to become a citizen, remained unchanged. According to this scenario, any ethno-cultural differences, identities, and boundaries are never inescapable and insurmountable. Each human being, if he deems it worthwhile, is intrinsically able to adapt and consequently become a full-fledged member of the *cité* wherein all relationships between individuals, as well as all relations between people and public institutions, are regulated by a social contract, which, in theory at least, has no room for ethnicity and culture.

Whether ethnic, cultural, or national, for the French model any type of belonging is never definitively set; on the contrary, it can be modified through acculturation processes that lead to integration via the assimilation of those who are not regarded as foreigners. The assimilation process, which clearly entails significant changes in the individual's cultural identity, legitimizes welcoming the *xenos* to the bosom of the community and the national State.

This brief presentation already highlights that the French type of national State is associated with the concept of a more *open* society than other models of political-administrative organization. This fact is further substantiated by the actual, albeit incomplete application of the *jus soli* in the French juridical system.

On the other hand, we ought to bear in mind that the significant openness in welcoming foreigners is counterbalanced by the surprisingly weak appreciation for ethno-cultural differences within its own national territory. Eugene Weber (1976) has aptly shown how the French national State's various governments between the end of the revolution and World War I set up an extensive assimilationist apparatus aimed at reducing ethno-cultural differences between its various regions as much as possible (yet was unable to do so completely).

As expressed in the original title of this author's work, peasants with their local characteristics would have been transformed (and to some extent they were) into more or less standard French citizens

(Weber 1976). Minorities in France, that is groups within the country that on the strength of real or purported ethno-cultural criteria demand the recognition of their diversity and may voice claims to territorial autonomy (see, *e.g.*, Corsica and Brittany) are ignored or kept out of sight to this day. At best, they represent an awkward though perforce acknowledged reality.

Moreover, the law known as *Loi Pasqua*, which reformed the renowned *code de la nationalité*, one of republican France's juridical institutions, came into force on January 1, 1993. Without delving into its legal technicalities, this law makes obtaining nationality more difficult especially for immigrants. Consequently, there is a creeping ethnicization that puts present-day France increasingly in contrast with the revolutionary ideal of *patrie ouverte*, thus also with the one of *political nation*. We can rightfully wonder whether France is undergoing the Germanization.

The German Model

The national state based on the German model is often described as *ethnic*, in this context mainly with a negative connotation. The use of this adjective expresses, rightly or not, the fact that the German model of national State is based on genealogy, that is on the shared origin of its citizens.

In our opinion, linking the German model with the notion of *Volk*, which not always has an ethnicizing overtone, would be more appropriate from a historical viewpoint. It is common knowledge that Johann Gottfried Herder, together with the Grimm brothers, popularized the idea of *Volk* and its derivatives such as *Volkgeist, Volkseele, etc.* Therefore, viewing Herder as the first zealous advocate of the ethnic variant of the concept of *Volk*, thus stigmatizing him as the inventor of *the most dangerous explosive of modern times* (Talmon 1967: 22; Finkielkraut 1987: 56f.), would be both misleading and somewhat incorrect. In fact, Herder believed that the genuine expressions of *Volkgeist*, thus also of the *Volk*, were principally the language and its literary evidence, such as fairytales, poems, proverbs, phraseology, *etc*. This author was rather a representative of Germanic *cultural patriotism* and one of the creators of the concept of *Kulturnation* (Pierré-Caps 1995: 79f.).

Undeniably, however, during the 19th century several intellectuals, including renowned politicians, artists, jurists, philosophers, historians and, last but not least, folklorists (*Volkskundler*) increasingly defined the culturalistic notion of *Volk* in ethnicizing terms. Descent and origin, no longer regarded symbolically but strictly physiologically, became the inherent characteristics of the *Volk*, by then understood to be *my people* (the German one, clearly). Yet, for a long time this ethnicization of the idea of people and nation in Germany would circulate solely in intellectual circles and would not have juridical consequences on the right to citizenship. As pointed up by historian Rudolf von Thadden, a definitive shift towards the institutional birth of a German ethnic nation took place only in 1913 with the introduction of a restrictive variant of the *jus sanguinis* principle in the Reich's juridical system (Pierré-Caps 1995: 112; Gosewinkel 2001). Accordingly, what became known as the German model of the national State, determined by the formula *the people as an ethnic entity is the essence of fully entitled citizens*, became a reality only at this time (Grawert 1973: 166). Thus, descent and origin become the two fundamental criteria to define who belonged to the nation and who was excluded.

The escalation of nationalism over the next years led to a gradual ethnicization of the German model, which, via National Socialism and its infamous Nuremberg Laws, inevitably led to the racialization of the notion of *Volk* and of the national State. After the abominable aberrations of the Nazi period, post-war Germany, though never a strictly ethnic State, renewed its links with the previous model of national State in which ethnicity overrides culture. To corroborate this last statement we need only mention the notion of citizenship in the Federal Republic at the time of the two Germanies (1945–1990). As constitutionalist Böckenförde aptly noted, the Federal Republic recognized one citizenship only, that is the German one, regardless of all the changes that occurred after 1945 with the division of Germany into two separate States (Böckenförde 1968: 424). Before the reunification, therefore, neither a specific citizenship of the BRD (Federal Republic of Germany) nor the one of the DDR (German Democratic Republic) were recognized. Instead, only one German citizenship was juridically considered as such, that is the expression

of both the unchangeable ethnic unity of the *Volk* and of the continuity of the national State born in 1866.

The power of ethnicity in the German model was noticeable also after the Fall of the Berlin Wall and the country's subsequent reunification, especially by comparing the situation of the *Aussiedler*, re-immigrants of German origin that wished to settle permanently in Germany, to that of immigrants mainly from southern Europe, Turkey and other African and Asian countries. In fact, by virtue of the ethnic notion of *Volk* and of the *jus sanguinis* principle, the *Aussiedler* could acquire German citizenship nearly automatically, that is by proving to have had even remote ancestors from Germany in the past centuries. Until the red-green coalition headed by Chancellor Gerhard Schröder passed new laws, nationality was granted solely on the grounds of descent, regardless of potential links to the German culture. The other immigrants, instead, despite their lengthy residency and even their birth in Germany including their acculturation and integration process in German society, still had to go through complex *naturalization* procedures to be granted nationality.

To remedy this paradox, on June 23, 1999 the German parliament led by a red-green majority ratified a new law on nationality that in essence sought to partially de-ethnicize the German model. The reaction of the opposition's center-left parties (CDU, CSU and FDP) and most of the population was very negative. Yet, despite their initial opposition, the center-right governments that replaced the red-green coalition did not repeal the law. German citizenship is currently based on the idea of belonging to a cultural collectivity and not a genealogical one. Under this aspect, the German model has been somewhat Gallicized.

French Model *vs.* German Model? Differences and Similarities
European Nation-States have far too often been regarded as sheer geographical expressions. Though not completely off the mark, this approach is exceedingly reductive since it overlooks the fact that a nation's political-institutional architecture is also and foremost a social organization. In particular, as Rogers Brubaker aptly remarked, it disregards the fact that in the first place the national State is a political association of citizens to which the latter be-

long owing to specific attributed or acquired shared prerequisites (mainly cultural ones) (Brubaker 1992). Accordingly, not everyone can be fully entitled to belong to a given national State. Drawing on a well-known formula by Max Weber, we could say that as a rule a nation's political organization is *an association partially open to the outside* (Weber 1956: 26). Clearly enough, this limited openness towards the outside, namely towards the *foreigner*, that is most often the *culturally other*, implies creating institutional mechanisms of social selection to regulate belonging and foreignness. Citizenship and/or nationality are the fundamental instruments to indisputably determine who is fully entitled to belong to a national State and who is not. Therefore, citizenship and/or nationality are closely linked to practices of inclusion and exclusion.

If we focus on the practices of inclusion and exclusion towards the culturally different, we can observe an essential analogy, despite obvious dissimilarities, between the French and the German model with reference to the recognition of ethno-cultural diversity.

Through the *subjective* and *individualistic* vision of belonging buttressed by the *jus soli* principle, the French version of the national State is grounded on the principle that a person's otherness may and ultimately should be wiped out. Once assimilation has occurred and been substantiated, the former alien is granted political citizenship, thus is welcomed into the national community. The German version of the national State, with its *objective, naturalizing* and *collective* concept of difference strengthened by the *jus sanguinis* doctrine, inevitably and unchangeably determines the alien's belonging to an ethno-national group that is clearly dissimilar to the *Volk's* one. The alien is in principle denied the chance to obtain nationality, thus to become a full-fledged member of the German political community.

Yet, these apparently very dissimilar terms of exclusion and inclusion actually pursue the same goal of establishing, maintaining or at best restoring cultural and ethnic homogeneity on the entire national territory. In fact, a national State's territory that is not mono-cultural or mono-ethnic is perceived as an *anomaly* that needs to be modified somehow, if not indeed eradicated. For this reason, ever since their advent both the French and the German model have re-

vealed a considerable incompatibility with pluriethnicity and multi-culturalism, along with serious troubles in managing either one. This emerges very clearly in the problematic stance towards minorities and immigrants to whom the national State offers the alternative between assimilation and the supposed resulting passage from one identity to another (as in the French model), and the more or less permanent marginalization from the civic and political community (as in the German model).

The propensity for territorial homogeneity common to both in their own Nation-States stems from the fact that the prime movers of both models drew on the *Staatsnation* doctrine, a term much in use in the Germanic area, which, strangely enough, is of French origin (Pierré-Caps 1995). In this context, we need to highlight that this principle is based on the incisive formula *one nation, one State, one territory* (Altermatt 1996), that is on the nearly untouchable and indisputable axiom by which the area occupied by a nation must coincide with the state's territory. If the two models of Nation-States just described adhere to the above-mentioned postulate, then clearly the logical corollary is the achievement of ethno-cultural homogeneity in their territory.

EUROPEAN NATION-STATES AND POLITICS OF ETHNO-CULTURAL HOMOGENIZATION: ASSIMILATION AND ELIMINATION OF HISTORICAL MINORITIES

After these theoretic considerations, now we will look at the empiric reality. A reconstruction and analysis of modern European history shows that during this period Nation-States constantly endeavored to make their territories and societies increasingly homogeneous both culturally and ethnically.

In fact, the past two centuries in particular were characterized by ongoing efforts to turn each national territory into a gradually more homogenous one in terms of culture and ethnicity, especially in Central and Eastern Europe where the *Staatsnation* principle was introduced much later than in Western Europe, that is only after the collapse of the *multicultural empires* (*Vielvölkerstaaten*). These processes of 'ethno-cultural recomposition' aimed at making the Nation-

States 'ethnically pure' are achieved through a dreadful, ongoing and far from over series of boundary revisions, forced assimilations, banishments, targeted and planned immigrations, deportations, ethnic wars and cleansings, genocides, reinstatements and secessions. Except for the time gap and the means employed, the advocates of the Hitlerian *gardener State* (Bauman 1996: 43ff.), those who carried out the Nazi *final solution* for the Jews and Gypsies, and the 'engineers' of the 'ethnic cleansing' in the Balkans (Grmek *et al.* 1993) all share a corresponding goal, that is the elimination of any 'ethno-cultural heterogeneity' within the state entity in which they live and act.

Yet, believing that Western Europe did not experience similar homogenizing upheavals would be a mistake. In fact, through the *très longue durée* perspective we notice a crescendo from the Albigensian Crusade (1208–1244), to the expulsion of *marranos* and *moriscos* from Portugal and Spain (1492), to St. Bartholomew's Day massacre (1572), to the various wars of religion that bloodied Western Europe during the Reformation and the Counter-Reformation (the 15th and 16th century), up to the cleansing urges that would prove crucial to the gradual construction of homogeneous societies in the *Staatsnationen* of this part of the Old Continent (Giordano 2001, 2003).

Speaking about these examples as cases of planned 'ethno-cultural homogenization' is probably anachronistic. Yet, without falling into the trap of mechanical evolutionism, it is certainly correct to point up the existence of a *historical time lag* between Western and Eastern Europe, rather than a purported significant difference in their ambition to make their territories more culturally and ethnically homogeneous.

A periodization of the various processes of 'ethnic separation' in which more or less all European Staatsnationen were involved during the past two centuries will display roughly four surges whose virulence would be fraught with consequences for the entire continent's layout.

The first surge struck the Balkans in particular soon after the creation of the first Nation-States in the 19th century. Vast contingents of population of the Turkish origin or simply of Muslim religion were forced to leave the region. As administrators and civil servants

of the Ottoman Empire, they did indeed represent the hated occupiers, but members of social strata that had nothing or little in common with the ruling class were involved in the expulsion process as well. During the great Crisis in the Orient, which led to the bloody Russian-Turkish war, from 1875 to 1878 alone a million and a half people were repatriated. At that time and for the area involved, it was an exceptional movement of people (Giordano 2001, 2003).

The second virulent phase took place between 1913 and 1925. It was characterized by the forced transfer of entire minoritarian ethnic groups, yet it was internationally recognized and guaranteed. In the diplomatic language of those days, it was euphemistically termed 'population exchange'. Some examples illustrate the 'homogenization' strategies through 'ethnic separation'. Substantial groups of the Albanians from Kosovo and western Macedonia were transferred to Turkey at the end of the Balkan Wars (10.8.1913) mainly because of their religion. These in turn were substituted by the Serbian, Montenegrin, Croatian, and Slovenian people, especially after the creation of the Kingdom of Serbs, Croats, and Slovenes, with the intention of 're-Slavizing' the region. The alleged 'population exchange' between Greece and Turkey was even more dramatic. It was decreed by the Treaty of Lausanne in 1923, which ratified a series of reciprocal expulsions and hasty repatriations caused by the Greek military catastrophe during the reckless campaign in Asia Minor. After the tremendous defeat, Greece was overrun by refugees from the coasts of western Anatolia plus the Greeks (as well as the Armenians) from the Black Sea area and the Caucasus who had been fleeing the new Bolshevik régime's repressions after 1917. A country with a population of 4.5 million thus faced the arrival of 1.3 million refugees. At the same time, the 'population exchange' provided for the departure of the 'inhabitants of Muslim religion', mostly the Turks but also the Albanians (Giordano 2001, 2003).

The third *ethnic homogenization* surge spanned the decade between 1940 and 1950 that was prevalently marked by the Nazi policy of annihilation, transfer and expulsion of entire ethnic groups or groups regarded as such and by Stalinist deportations and purges. Along with the holocaust of the so-called *transnational minorities* (Kende 1992: 13ff.), namely the Jews and Roma, there were mas

sive population movements in all of Central and Eastern Europe that would considerably alter the ethnic map of this part of the continent. Eleven and a half million Germans were expelled from the *Ostgebiete*, while three million Poles, two million of which from the regions that were assigned to the Soviet Union after World War II, would settle in Silesia and in the southern part of eastern Prussia. As a result, Poland became an almost monoethnic country, quite consistent with the *Staatsnation* ideal. The treaties between Czechoslovakia and Hungary and between the latter and Yugoslavia, which likewise provided for reciprocal 'population exchanges', date back to the same period immediately after World War II (Giordano 2001, 2003).

Finally, Stalin consolidated his conquests in the western part of the Soviet Union through a policy of 'planned' and often imposed 'mobility'. On the one hand, this involved the deportation of populations considered 'accomplices of the enemy', thus 'traitors of the Great Patriotic War' (the Latvians, Lithuanians, Estonians, *etc.*), to Siberia or central Asia. On the other hand, it involved substituting them with immigrants mainly of the Slavic origin such as the Russians, Belarusians, and Ukrainians who were considered more 'reliable' (Conte and Giordano 1995: 28ff.).

The fourth virulent phase of *ethnic homogenization*, which may be termed *the return to the national State*, is the wave of ethnic separations that devastated Central and Eastern Europe over the past fifteen years. It can be traced back to Socialist Bulgaria with its alleged *solution of the nationality issue*, namely with the expulsion and/or forced assimilation of the 'ethnic Turks' in the second half of the 1980s. The phase continued with the disintegration of the three countries born after World War I (Yugoslavia, the Soviet Union and Czechoslovakia) via a multiethnic and multinational 'logic'. All the new and old States generated by this process are based on the *Staatsnation* principle. Thus, the war in Bosnia was fully in line with this tragic but centuries-old logic of homogenization. Given the historical antecedents, it would have been rather surprising if the war had not broken out, while the Dayton Agreement, despite obvious formal differences, is but a new version of the Treaty of Lausanne (1923) dissembling a project of *ethnic recomposition*. Present-day

Bosnia, in fact, is a sham multicultural State since it is divided into two different ethno-political entities. On the one side is the *Muslim-Croat Federation* in which the two communities are territorially and socially separate, and on the other side is the *Republika Srpska* with its practically autonomous political life.

The war and the independence of Kosovo have notoriously led to a double *ethnic cleansing* in Kosovo. At first, the Serbs tried to annihilate or expel the ethnic Albanian population from the region. Then, when Slobodan Milošević lost the war declared on him by NATO, a Kosovar State with a vast Albanian majority was created. At the same time, most of the ethnic Serb population was expelled. The entire process of the double ethnic cleansing was once again in accordance with the founding principle of European Nation-States: the ethnic homogeneity.

The separation between Serbia and Montenegro had a similar ethnic connotation, though for once there was no violence involved. The *long-standing conjuncture* is not over yet! In any case, thanks to these homogenization policies in the name of the ideal of a mo-noethnic and monocultural national State, the multiculturality of many European regions has dwindled if not disappeared over the past two centuries.

EUROPEAN NATION-STATES AND THE EXCLUSION OF IMMIGRANTS

During the last fifty years of the 20th century and the first decade of the 21st century, Europe underwent major population movements that may be regarded as this epoch's most significant phenomenon. For the time being, these migrations caused by economic (job seek-ing) or political reasons, that is humanitarian (political asylum), have affected Western Europe more than Central-East Europe, where up to 1989, the Soviet hegemony allowed only a limited (and mostly planned) mobility although the phenomenon of immigrant laborers was not totally unknown (the Vietnamese in former GDR, Czecho-slovakia, and even in the far less industrialized Bulgaria).

Within the EU and its former community institutions (ECSC, ECM, EEC, EC), a gradual, albeit slow frontier abatement between

member States further eased transnational mobility. Since the late 1950s, vast contingents of laborers from the Mediterranean and Southeast peripheries (Italy, Spain, Portugal, Greece, and former Yugoslavia) reached the core (France, Germany, Austria, Switzerland, Benelux, the United Kingdom, and Scandinavia) where they found jobs primarily in the industrial sector (heavy industry, construction industry, *etc.*) and in fields no longer sought after by the 'autochthonous' population (low status activities). From the 1970s on, these immigrants were joined by an increasing number of laborers from the Mediterranean area bordering on the Old Continent (Turkey and Maghreb). Despite strict measures introduced in the early 1970s regulating foreigners' permanent entry, at this time Europe's northwestern countries became 'immigration societies', although some of them, such as Germany and Switzerland, still challenge this denomination.

In the meantime, Mediterranean Europe's old 'emigration countries' also became 'immigration countries' where, somewhat differently from Northwestern Europe, foreigners arrived mainly from the so-called Third World countries (Sub-Saharan Africa, Southeast Asia, China, Indian subcontinent, Latin America, *etc.*), and from the Old Continent's most underdeveloped areas (Albania).

From the end of the 1980s, however, what became known as 'mass unemployment' worsened in all Western Europe: therefore, recruitment of foreign workers fell drastically, while political and humanitarian immigration increased.

At the same time, after the fall of the Berlin Wall (1989) and the subsequent opening of frontiers, large numbers of migrants arrived mainly from non-European regions in former Socialist bloc countries. Central-east Europe, with its difficult sociopolitical transformation and unstable economy, was not regarded as a final destination by these migrants, but only as a stopover on their way to Western Europe. Therefore, former 'Real Socialism' Europe became a *buffer zone* (Wallace *et al.* 1999: 123f.).

The above-mentioned migratory events deeply affected present-day Europe's setup, calling in question the order based on the ideal of the territory's ethno-cultural homogeneity created by Nation-States. The growing presence of diasporas, transnational groups, creolized

communities, and deterritorialized collectivities in Europe's social and cultural setting generated fears, rejection and discrimination against these communities in the so to speak *autochthonous* populations. Nowadays racism is not solely a haunting albeit past experience. In this context, we ought to mention in particular the strong Islamophobic drift that can be observed from Scandinavia to Italy, from Spain to the Netherlands and from France to Austria including Switzerland.

Governments that at first, also for reasons of economic expediency, had actually encouraged the first immigrations had also been rather tolerant of these new arrivals from remote peripheral countries and from societies whose cultures were very different from the European ones. At the time, that is especially during the 1980s and 1990s, some countries endorsed policies based on the concept of *multiculturalism*, that is on the principle of mutual recognition and respect of cultural diversity. This seemed the necessary remedy to the illusory idea of *integration* very popular in the 1960s and 1970s (Giordano 1984: 487ff.; 2010: 11ff.). Therefore, the multicultural model was regarded as an alternative to the ideal of the monoethnic national State. This, however, turned out to be a naive and do-good form of *multiculturalism*, since it was based on voluntarist conceptions by which members of the different communities need only get together, possibly at patently folkloristic events, in order to achieve a harmonious coexistence nearly automatically. As proven by the German *MultiKulti* experience and by the rather reckless British and Dutch *laissez faire*, it was a bitter disappointment (Leggewie 1991; Cohn-Bendit and Schmid 1992). Thus, the national management and *good governance* that were lacking in Europe's multiculturalism should not be ascribed to multiculturalism, but rather to its lax version.

The awareness of the failure of voluntarist multiculturalism surfaced at the beginning of the 21st century, especially after 9/11. The politicians, social workers, and migration experts started to rethink the question of immigrants' cultural difference. In essence, they backtracked to the former concept of integration with its naively ethnocentric view by which the Western model of society was so appealing that immigrants from the Mediterranean area would eas-

ily, if not eagerly, adapt to its social norms and practices in no more than three generations. The current notion of *integration*, therefore, seems like a *déjà vu* marked by vagueness and ambiguity. Max Weber would define it a sociologically amorphous concept (Weber 1956) because of its lack of specificity.

French sociologist and migration expert Dominique Schnapper has recently tried to distinguish the various meanings of the term integration in the context of migration (Schnapper 2007). The upshot of this analysis is that there are practically infinite forms of integration; in the end, the reader still does not know what it really is. Ultimately this puzzlement is the result of current debates on the theme of integration in Europe by which it could be anything and its opposite. Some believe that integration is a proper adjustment to one's working environment, for others it means participation in the civil and political society of one's country of residence in terms of constitutional patriotism in keeping with Jürgen Habermas (1995). The majority thinks that it implies a radical cultural identity change, thus assimilation, pure and simple. Probably, the current popularity of the integration concept lies precisely in its being amorphous because this *quality*, so to speak, is politically convenient and trouble-free since each public figure can use it any way he likes. This is particularly noticeable in the current Italian debate on integration.

Yet, there is a second and more disquieting aspect. All these notions tend to be exclusively unidirectional. Immigrants must adjust somehow and there is no reciprocity from the host society. This stance, however, is sociologically outdated and by now untenable since it harks back to assimilation modalities that notoriously foundered in the past. Finally, also the current projects of integration are grounded in Western modernity's civilizing superiority, which immigrants from less modern, thus more primitive societies, ought to acknowledge and accept.

In conclusion, the various migratory waves towards the industrialized and economically wealthy Europe left the myth of a culturally homogenous and territorially monoethnic national State unscathed. Indeed, the ideal of the nation's homogeneity has probably become stronger.

MALAYSIA: A VERY DISTINCT CONSOCIATION

John S. Furnivall, through his deep knowledge of societies created by the British Empire in Burma and by the Dutch in Indonesia, coined the term *plural societies* to describe them (Furnivall 1944 [1939]). The Malaysian society, a legacy of British socioeconomic engineering, may still be defined as such after over fifty years from the end of colonial domination. By means of this concept, Furnivall pointed up a crucial aspect of *plural societies*, namely, their marked cultural diversity. In his analysis of these societies, Furnivall drew from a theorem formulated by John Stuart Mill, which the utilitarian philosopher summarized in this famous passage:

> Free institutions are next to impossible in a country made up of different nationalities. Among a people without fellow-feeling, especially if they read and speak different languages, the united public opinion, necessary to the working of representative government, cannot exist (Mill 1958: 230).

In line with this philosophical tenet, Furnivall upheld that *plural societies* consist of 'two or more elements or social orders which live side by side, yet without mingling, in one political unit' (Furnivall 1944: 446).

Given the lack of shared values and mutual fellow-feeling, these societies are unable to develop a satisfactory social cohesion, thus are doomed to live in a constant state of war, social disorganization and political uncertainty. This is how Furnivall described the likely scenario of social life in *plural societies*:

> The community tends to be organized for production rather than for social life; social demand is selectionalized, and within each section of the community the social demand becomes disorganized and ineffective, so that in each section the members are debarred from leading the full life of a citizen in a homogeneous community; finally, the reaction against these abnormal conditions, taking in each section the form of Nationalism, sets one community against the other so as to emphasize the plural character of the society and aggravate its instability, thereby enhancing the need for it to be held together by some force exerted from outside (Furnivall 1944: 459).

As a proper British public servant, Furnivall evidently voiced the need for the presence of a colonial power to prevent disruptive conflicts between the various ethno-cultural communities. Yet, Furnivall's gloomy predictions were not much off the mark since some *plural societies*, as for example the Fiji Islands, proved to be politically and socially fragile precisely because of their divisions along ethnic lines strengthened by socioeconomic imbalance between the various communities. Furnivall's hypothesis, however, is not generalizable since several *plural societies*, such as Mauritius, Trinidad and Tobago and South Africa, proved to be much more stable and cohesive than expected. Most likely Nelson Mandela is right when he speaks about *rainbow nations* and this formula can almost certainly characterize Malaysia as well.

In fact, since its independence in 1957, this country experienced a definite socioeconomic growth and an unexpected political stability. The *deadly ethnic riots* thematized by American political scientist Dan Horowitz (1985, 2001) occurred solely during a severe crisis as in the renowned and now distant May of 1969. The disorders between the Malay and Chinese at that time have become a sort of negative national myth, that is an incident that must never happen again, although at times similar, yet far less disruptive conflicts have occurred between ethnic communities in the recent past and most probably will occur again in the future, since these inter-ethnic tensions are inherent to societies such as the Malaysian one. We need to mention, however, that *deadly ethnic riots* have been occurring ever more frequently in the United States, United Kingdom, France and also in the latest countries of immigration such as Italy, Spain and Greece.

Contrary to some stances, I uphold the apparently paradoxical hypothesis that the coexistence of the different ethnic communities that make up Malaysia, especially the Malay, Chinese and Indian communities, was feasible thanks to a veritable cult of difference, thus thanks to the recognition of ethno-cultural diversity. Though not fulfilling everyone's expectations, the *social contract* in force since independence and subsequently redefined is based on a prudent if not indeed a wary variant of the concept of a *Malaysian Malaysia* as opposed to a *Malayan Malaysia*. The latter case would have meant

establishing a national State along the lines of European ones with an entitled nation, the Malay, and extranational minorities, namely the Chinese, Indians, *etc.* The former case, instead, worked toward a more open and inclusivist political solution, since, as Bellows aptly points up, 'A Malaysian Malaysia means that the nation and the state is not identified with the supremacy of any particular community or race' (Bellows 1970: 59).

This model of the State diverges from the classic European ones since it takes into account the country's polyethnic and multicultural structure of society and acknowledges all ethnic groups on the federation's territory at independence as members of the political community with equal rights without drawing a distinction between titular nation and minorities.

The constitution of 1957 represents the core of a consociative-like *identity bargaining* that has created a very specific type of *ethnically differentiated citizenship* (Hefner 2001: 28) grounded in the fundamental distinction between *natives*, namely, the Malays, and the other communities regarded as *indigenous* and *immigrants*, first of all the Chinese and Indians. Since the *natives* are economically and professionally the most disadvantaged group, they were granted a special statute concerning economy, education, and property rights (especially with respect to the land). As per Articles 89, 152 and 153 of the Constitution, they have specific territories reserved to them, special regulations for commercial licenses and concessions, and quotas in higher education. Immigrants were granted full Malaysian citizenship, as well as specific rights of religious and linguistic expression within a secular State in which Islam, however, is the State religion.

This institutional compromise, as two experts of this region – Milton J. Esman and Robert W. Hefner – have aptly pointed up, is the outcome of defensive strategies ascribable to reciprocal fears and mistrust that still characterize Malaysian society's different ethnic communities (Esman 1994: 57f.; Hefner 2001: 23).

Which fears troubled the different ethnic communities? The Malays and the other indigenous groups, being *bumiputera*, that is *sons of the earth*, thus *natives*, feared that due to their patent socioeconomic inferiority they would be overcome by the Chinese and Indi-

an enterprise and suffer the same miserable plight of the *red Indians in North America*, as some members of their elites stated verbatim (Esman 1994: 53). The Chinese and Indians, instead, were concerned about the future of their flourishing economic activities and of their cultural identity in a State with a strong Islamic connotation. The message conveyed by this instrument is that, though culturally different, we are all Malaysians; better yet, we are all Malaysians precisely because we can all cherish our diversity in this country.

Most likely, the doctrine of *national harmony*, that is the principle known as *rukun negara*, was invented because of these widespread fears. This ideological construct, though not very conspicuous in social practices, undoubtedly has a strong symbolic significance. It is a way to proclaim *unity in diversity*, though in practice it is a less optimistic *unity in separation*. These inventions, however, are also necessary to legitimize the government's power, which to some extent is what has occurred for the past 50 years.

At this point, we need to add that, in the context of the above mentioned constitutional compromise, public life abides by the ethno-religious boundaries. Because of these borders, the *non-bumiputera* have almost tacitly accepted the political preeminence of the bumiputera community, especially the Malay one, in exchange for their own economic freedom and supremacy. Consequently, Arend Lijphart speaks of *hegemonic consociationalism* with reference to Malaysia (Lijphart 1977: 5). However, this asymmetry is far from complete, or speaking about consociativism would be misleading. In fact, the federal government has always been a coalition of the three ethnic parties (plus a few minor parties) denominated National Front (*Nasional Barisan*). From the very start, this coalition has compulsively pursued, better yet striven to stage a spirit of *consensus* (*musyawarah*) that is difficult if not impossible to attain. Moreover, representatives of the *Malaysian Chinese Association* (MCA) and the *Malaysian Indian Congress* (MIC) as a rule serve as cabinet ministers, although representatives of the *United Malays National Organization* (UMNO) always hold the key ministries. Accordingly, the office of Prime Minister is customarily entrusted to a Malay who must, however, be able to play the role

of *great mediator* in case of interethnic conflicts that could jeopardize the nation's unity.

We should also bear in mind that Malaysia is an elective monarchy but that becoming king (*Yang Dipertuan Agong*) is the exclusive prerogative of the sultans of only nine states (out of thirteen) of the Federation. Though a purely representative post, it has a strong symbolic value since it signals the political predominance of the Malay over the *non-bumiputera* and the other *bumiputera*.

Over the years, the compromise elaborated by the constitution has proven obsolete and, on several occasions, new forms of negotiated agreements have changed the character of Malaysia's *ethnically differentiated citizenship*. Despite contrasts and permanent tensions among the various communities, a collegial and consensual solution has always been reached. Thus, after the May 13, 1969 *ethnic riots,* a New Economic Policy (NEP) was launched granting further social rights to the Malays whose socioeconomic situation over the twelve years of independence had worsened compared to middle and higher strata that were mainly comprised of non-Malays (Faaland *et al.* 1990: 17f.; Gomez 1999: 176f.).

In 1991, after a period of sensational and dizzying economic growth, which, at least apparently, somewhat lessened social differences between *bumiputera* and *non-bumiputera*, the coalition government launched the project *Vision 2020*, whose primary goal was to finally establish a *bangsa Malaysia*, that is *a united Malaysian nation with a sense of common and shared destiny* (Hng 1998: 118). In political practice, this would have meant establishing a *consensual, community-oriented democracy* (*Ibid.*: 118) that would guarantee the existence of a *tolerant society in which Malaysians of all colors and creeds are free to practice and profess their customs, cultures and religious beliefs, and yet feeling that they belong to one nation* (*Ibid.*: 119).

Vision 2020 aimed at making the concept of *ethnically differentiated citizenship* more inclusive by means of the notion of *bangsa Malaysia*, which would have brought together the various communities in a single civic body. Through the *pursuit of excellence, Vision 2020* endorsed a less ethnic and more meritocratic idea of

citizenship. From this point of view, Malaysia drew on Singapore's model of nation based on the combination of two founding myths – *multiracialism and meritocracy* (Hill and Lian 1995: 31–33).

When the current prime minister came to power, the project *Vision 2020* was shelved and substituted with the one denominated *1Malaysia*, which, though endeavoring to distinguish itself from *Vision 2020*, maintains some of its goals, especially the ones related to the creation of a more cohesive national society where ethno-cultural diversity still remains an essential element.

Summing up the above observations, Malaysia will probably continue to be an *ethnically divided society*, that is a multiethnic and/or multiracial entity based on consensual separation and socio-cultural inequalities between *natives* and *immigrants*, and between the single ethnic communities. The ongoing tensions and disputes, the permanent negotiations and subsequent compromises and, last but not least, the symbolic and political significance of the cult of diversity with its various stagings, will still be the cornerstones of the complex construction of both national and local social cohesion in this country founded on *unity in separation*.

The process is not over yet, however, because with its fast-paced economic development Malaysia is rapidly becoming a country of immigration and will have to tackle this phenomenon that makes the country even more ethnically and culturally diverse. But this new situation is a challenge to the current *regime of toleration* that will need to be addressed in the near future.

CONCLUSION: COMPARING INCOMPATIBILITIES

Comparing the politics of recognition of cultural diversity and the *regimes of toleration* in European Nation-States with the multicultural and multiethnic *bricolage* of the Malaysian consociation is challenging due to socio-structural incompatibilities stemming from drastically different historical experiences. A comparison is useful only via a contrastive approach that steers clear of universalist conceptions with their ethnocentric bias and of illusions about the effectiveness of intercultural dialogues based on goodwill declarations. European Nation-States with few exceptions have aimed at ethno-

cultural homogeneity and at lessening diversity in order to produce a stronger social cohesion. This political agenda was not significantly successful: historical and territorial minorities still exist and voice their recognition demands as actively as ever, while immigrations have created new and previously unknown differences. This is undoubtedly the unsolved dilemma of Europe's Nation-States.

Malaysia, instead, has had to face a pluricultural situation inherited from its colonial past, thus it was practically forced to develop a political agenda based on a *sui generis* multiculturalism, which endures thanks to the ongoing pursuit of daring political compromises and of the cult of diversity as an ideological staging. With this type of *bricolage*, social cohesion becomes possible, yet also permanently fragile. This, instead, is Malaysia's unsolved dilemma.

Finally, believing that an Occidental political agenda, on which the construction of European Nation-States is based, should be the only viable one and accordingly is exportable to other countries such as Malaysia is intrinsically incorrect. The opposite, though, is likewise untrue, that is that the Malaysian *bricolage* may be transferred to the Western world in order to cope with the current problems of the recognition of diversity.

Therefore, from a disenchanted relativist stance, to each his own solution to the recognition of cultural diversity provided that it takes account of specific historical experiences.

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