

Emigration and the Politics of Citizenship: The Preservation of Germanism Abroad

Before 1913 German citizenship law was internally inconsistent.¹ It stood between two models—an older model of the citizenry as a territorial community, and a newer model of the citizenry as a community of descent, the former a product of the absolutist territorial state, the latter of the emerging national state. Provisions governing the acquisition of citizenship did not correspond to those governing its preservation and loss. With respect to acquisition, the citizenry was defined as a community of descent; with respect to preservation and loss, the citizenry was defined as a territorial community. Prolonged residence in the territory no longer sufficed to acquire citizenship.² Prolonged absence from the territory, however, still occasioned the loss of citizenship (unless one took the special step of registering with a consulate).

By facilitating the preservation of citizenship³ by *Auslandsdeutsche*, the 1913 law severed citizenship from residence and defined the citizenry more consistently as a community of descent. Under the new law, residence abroad—however prolonged—had no bearing on citizenship. In theory, a family could reside abroad indefinitely, each succeeding generation assigned German citizenship at birth *jure sanguinis*, retaining it despite continued residence abroad, and transmitting it to descendants. In practice this was not so easy, for the new law, while uncoupling citizenship and residence, introduced two new grounds for the loss of citizenship: becoming a citizen of another state, and failing to fulfill military obligations. There were, however, significant exceptions and qualifications to these new provisions: naturalization abroad did not always entail the loss of German citizenship, and various measures made it easier for *Auslandsdeutsche* to fulfill military obligations.³ The law of 1913, moreover, facilitated not only the preservation of German citizenship but also its reacquisition by former citizens and their descendants, even those long domiciled abroad.⁴ This too gave greater weight to descent at the expense of territory as a constitutive principle of citizenship.

The demand for the civic inclusion of *Auslandsdeutsche* had a strong nationalistic coloration. There were two currents of nationalist thought and feeling: a focused, consistent ethnocultural nationalism, and a diffuse national pride in which statist and ethnocultural motifs were mixed. Although the demand for the revision of citizenship law stemmed from the first, the widespread support it elicited reflected the second.

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The Nationalization of Citizenship in Wilhelmine Germany

German citizenship law, although markedly expansive toward ethnocultural Germans, is markedly restrictive toward non-German immigrants. Naturalization rules are strict, and naturalization rates are very low. More important than naturalization policies and practices in accounting for the long-term civic exclusion of non-German immigrants, however, is the German system of pure *jus sanguinis*. While French citizenship law automatically transforms most second- and third-generation immigrants into citizens, German citizenship law is based exclusively on descent, allowing immigrants and their descendants to remain indefinitely outside the community of citizens.

The unusually strict and consistent German definition of the citizenry as a community of descent crystallized in 1913. The new law was inclusive toward emigrants and exclusive toward immigrants. On the one hand, it allowed Germans residing abroad—the *Auslandsdeutsche*—to retain their citizenship indefinitely and transmit it to their descendants, whereas previously citizenship had been lost after ten years' residence abroad. On the other hand, the government and the Reichstag majority emphatically rejected, as unacceptable encroachments of *jus soli*, several amendments that would have accorded the right of naturalization to persons born and raised in Germany. The new law marked the nationalization, even the ethnicization, of German citizenship. While late-nineteenth-century French nationalism, state-centered and confidently assimilationist toward foreigners, permitted, even required, the transformation of immigrants into citizens, turn-of-the-century German nationalism, ethnoculturally oriented and "dissimilationist" toward immigrants from the east, required their civic exclusion.

The automatic loss of citizenship after ten years' residence abroad had been under sharp attack since the last decade of the nineteenth century. The attack was led by the Pan-German League, which was devoted to the "preservation of German *Volksstum*."⁵ At its first convention in 1894, the League proposed making it easier for Germans living abroad to retain citizenship, and making naturalization more difficult for foreigners.⁶ In December of that year, Ernst Hasse, President of the Pan-German League and a National Liberal deputy, introduced a resolution in the Reichstag with this double aim.⁷ A consistent ethnonational outlook underlay both aims.⁸ For Hasse and the Pan-Germans, immigration was unnecessary, given Germany's rapidly growing population and the persisting emigration.⁹ More important, it was harmful, in that the "*Sprachen- und Rassenfremde*"¹⁰ among the immigrants, especially Poles and Jews, aggravated the already difficult task of realizing an ethnically homogeneous nation. Even if a certain amount of immigration was unavoidable under modern conditions, there was no need to grant migrants citizenship. *Volksfremde*—foreigners to the *Volk* and its ethnic culture—should not, as a rule, be naturalized. The Empire could draw on a more desirable stock of potential immigrants and citizens from dissatisfied emigrants and their descendants and from beleaguered ethnic German communities, subject to increasing assimilationist pressures, in the Baltics and Hungary. These ethnic Germans, and they alone, should have a right to naturalization. To facilitate the return of emigrants, German citizens living abroad should be able to preserve their citizenship indefinitely and transmit it to their descendants, even after acquiring foreign citizenship; and emigrants having lost German citizenship should be able to reacquire it. Restricting the naturalization of non-Germans, facilitating the naturalization of ethnic German immigrants, and allowing German emigrants to retain their citizenship abroad (or easily reacquire it) would further the goal of promoting an ethnically homogeneous Empire. For Hasse, allowing *Auslandsdeutsche* to retain their citizenship indefinitely was just one part—and not the most important part—of a larger plan to remake Germany into a true nation-state.¹¹

Hasse's attack on the automatic loss of citizenship through prolonged residence abroad was widely supported. It was taken up by other nationalist organizations¹² and supported in the Reichstag by all parties.¹³ A spate of scholarly articles and legal dissertations called for reform.¹⁴ No one defended the status quo. Only the government was initially reluctant, but by 1901 it had agreed in principle to the change.¹⁵ The

popularity of the reform reflected its broad nationalist appeal. Only a few small right-wing parties, to be sure, shared Hasse's consistent ethnocultural outlook and agenda.¹⁵ The nationalism informing the widespread support for the civic inclusion of *Auslandsdeutsche* was not an intellectual's nationalism, consistently articulated and elaborated, like that of Hasse; it was rather a diffuse set of habits of thought and feeling about the Reich, *Deutschtum*, and the *Auslandsdeutsche*. Nor was it consistently ethnocultural; it oscillated uncertainly between a statist and an ethnocultural pole, with the status of the *Auslandsdeutsche* understood now in relation to the Reich, now in relation to *Deutschtum* as a whole—sometimes in the course of a single speech.¹⁶

The statist perspective emphasized the close ties of the *Auslandsdeutsche* to the Reich. The old provisions governing the loss of citizenship through residence abroad, it was argued, no longer suited the times.¹⁷ Earlier emigrants had left without intending to return; they had severed their ties to the Reich or allowed them to atrophy. Moreover, the Reich had been in no position to protect those emigrants who might wish to retain their citizenship.¹⁸ But things had changed. Improved transportation and communication and the development of a lively German language press abroad permitted *Auslandsdeutsche* to maintain their ties to the homeland. And, unlike earlier emigrants, recent emigrants had not gone overseas "in order to separate themselves economically and politically from their Fatherland," but, in many cases, "in order to work economically and politically in the service of the Fatherland."¹⁹ A strong *Reichsnational* consciousness had developed: "*Civis Germanus sum*"—formerly an empty phrase—was now a "proud avowal of membership of a large and powerful state."²⁰ And that state now had the means—a network of consulates and a strong navy—to protect its foreign citizens effectively. The connection between the *Auslandsdeutsche* and the Reich, finally, would be assured by making the preservation of citizenship contingent on fulfilling military obligations and on not voluntarily acquiring a foreign citizenship.

The ethnocultural perspective emphasized the "preservation of Germanism abroad" (*Erhaltung des Deutschthums im Ausland*). Not only the far-right nationalist parties but the National Liberals, the Center Party, and even the government invoked this as the central value to be realized through the reform of citizenship law.²¹ *Deutschtum* (Germanism) was an ethnocultural, not a legal category. It was both more and less inclusive than the legal category of *Reichsdeutsche* (citizens of the Reich), including millions of *Volksdeutsche* (ethnic Germans) outside the Reich

but excluding *Reichsdeutsche* who were not ethnic Germans, notably Poles. In this perspective, the reform sought to preserve and strengthen *Deutschtum* abroad by making German citizenship more widely available to *Auslandsdeutsche*.

But to which *Auslandsdeutsche* was citizenship to be made more accessible? The statist argument focused on current and future emigrants, who would be allowed to retain their citizenship (assuming that they satisfied military obligations and acquired no other citizenship) or to reacquire citizenship if they had lost it under existing law through ten years' residence abroad. The ethnocultural argument focused on the wider circle of persons addressed by the law—descendants, in any generation, of former citizens.²² Such descendants were eligible for naturalization even if they continued to reside abroad, even if they were descended only on the maternal side,²³ and even if they possessed a foreign citizenship. Such persons, it is true, were not accorded an unconditional right to naturalization,²⁴ and the government indicated that demands for naturalization under this provision by persons possessing a foreign citizenship would be closely scrutinized.²⁵ But apart from statist reservations about dual citizenship, it was clear that the federal government, the individual states, and all political parties agreed on the desirability of naturalizing ethnocultural Germans.

There were two sides, then, to the wide extension of citizenship to *Auslandsdeutsche*. On the one hand, it would strengthen *Deutschtum* abroad by binding it more closely to, and placing it under the protection of, the Reich. On the other hand, it would bind the Reich more closely to *Deutschtum*; it would make the German Empire more German. Only Hasse and the small ultranationalist parties consistently and explicitly followed this second line of thought, but it was implicit in the position of the government and the National Liberals as well.²⁶ Germany had "an interest in strengthening return migration to our homeland," argued von Richthofen, and thus in facilitating the reacquisition of citizenship by *Auslandsdeutsche*; but as a demographically vigorous country, it had "not the least interest" in the immigration of "complete foreigners" (*Vollausländer*).²⁷

Yet despite Germany's demographic vigor, the immigration of "complete foreigners" had increased sharply. Between 1890 and 1910 the number of resident foreigners tripled—from 430,000 to 1,260,000.²⁸ Alone among European states, Germany had both a huge emigrant population (roughly three and a half million) and a substantial immigrant population in the early years of the twentieth century.²⁹ The Wilhelmine citi-

zenship reform must be understood in this dual context. The new law made citizenship more accessible to emigrants permanently settled outside, and less accessible to immigrants permanently settled inside, the Reich. The traditional German distinction between nation and state, *Volk* and *Staat*, was now projected onto the plane of citizenship law. The definition of the citizenry was nationalized—brought into closer relation with the ethnocultural frame of the nation and detached from the territorial frame of the state. The citizenry was defined by genealogical rather than territorial coordinates, by descent rather than residence. The full significance, then, of the new openness toward emigrants can be seen only in the context of closure against immigrants.

Immigration and the Politics of Citizenship: The Preservation of Germanism at Home

Severing citizenship from residence, the Wilhelmine reform defined the citizenry more consistently as a community of descent in two ways. First, as we have just seen, it made citizenship more accessible to emigrants and their descendants. Second, and more important, it denied a right to citizenship to persons born and brought up in Germany. This did not involve a change in the law.³¹ But in the context of a large and growing immigrant population and demands for easier naturalization, particularly for persons born and raised in Germany, the decision to preserve pure *jus sanguinis* invested that legal principle with new meaning, transforming it from a taken-for-granted fact into a self-conscious normative tradition.

Jus soli and *jus sanguinis*, strictly speaking, are principles governing the unilateral attribution or ascription of citizenship by the state, not the voluntary acquisition of citizenship by an individual through naturalization. In this strict sense, *jus soli* was not rejected in 1913; it was not even discussed. Since the early nineteenth century, the attribution of citizenship in individual German states, the North German Confederation, and the German Empire had based exclusively on *jus sanguinis*.³² Pure *jus sanguinis* was a well established legal tradition. It is a measure of the strength of this tradition that nobody proposed to tamper with it in 1912–13. There was extended and vigorous debate about other facets of citizenship law, but none about rules of attribution. Even those who presented themselves as advocates of *jus soli* did not propose to attribute German citizenship to persons born in Germany; instead, they proposed to give such persons a right to naturalization. The difference is signifi-

cant. The attribution of citizenship *jure soli*—not only the unconditional *jus soli* that prevailed in the Americas, but also the conditional *jus soli* adopted in France and elsewhere to supplement *jus sanguinis*—was unthinkable in the German setting. In the age of nationalism the automatic transformation of immigrants into citizens through the workings of *jus soli* presupposed confidence in the assimilatory powers of the state—confidence that characterized France in the 1880s but not Wilhelmine Germany. Not even the attribution of citizenship *jure soli* to third-generation immigrants—persons born in Germany whose parents were also born in Germany—was considered. That the citizenry was fundamentally a community of descent, legally constituted through the attribution of citizenship to the children of German citizens, was beyond dispute. The contrast with the French debate of the 1880s is sharp. Not only did France end by adopting a system of conditional *jus soli* that automatically transformed most second-generation immigrants into citizens; French parliamentary discussions even considered the more radical possibility of adopting unconditional *jus soli* and attributing French citizenship automatically to every person born in the territory (as Napoleon had proposed during the debates on the Civil Code). Neither alternative was conceivable in Germany, despite the burgeoning immigrant population. The first point to underscore, then, is that the universe of discourse was more narrowly bounded in Germany than in France; the attribution of citizenship *jure soli* lay beyond the horizon of the possible.

Although the attribution of citizenship *jure soli* was not even under consideration, there was nevertheless a vigorous debate about the principle of *jus soli*, both in the legislative committee that examined and reworked the original government proposal and on the floor of the Reichstag. The debate was occasioned by a series of Social Democratic proposals to liberalize naturalization by making it a matter of right for certain persons, particularly those born and raised in Germany. Thus one proposal would have given a right to naturalization to persons born in Germany and residing there without long interruptions until majority; another to persons born and raised in Germany and willing to serve in the army; a third to persons born in Germany of a resident foreign father and an (originally) German mother.³³ All these proposals sought to ground a right to naturalization on birth and residence in the territory. Their opponents seized on this territorial aspect to brand the proposals as vehicles of *jus soli*. The Social Democrats did not deny wanting to introduce elements of *jus soli* into German citizenship law—as a princi-

ple of naturalization, though not of attribution. After all, they argued, the citizenship laws of almost all other major states contained elements of *jus soli*.³⁴ Leading legal scholars, they pointed out, had argued for the introduction of elements of *jus soli* to complement the system of attribution based exclusively on *jus sanguinis*. Persons born and raised in Germany, most fundamentally, were German in fact and ought to have the right to become German in law.³⁵ The Social Democrats were seconded in this line of argument by the Progressives, Poles, and, to some extent, by the Center Party.

The government, however, vehemently rejected the Social Democratic proposals, and the Reichstag majority concurred in this rejection.³⁶ The talant of *jus soli* was enough to disqualify them from serious consideration. This is evident from the several occasions on which the sole or decisive criticism of a proposed amendment was that it would introduce *jus soli*.³⁷ In no form, however modest, was *jus soli* acceptable. Its introduction, according to one government representative, "would run against our entire outlook."³⁸ Ultimately the state governments, dominated by Prussia, threatened to withdraw support for the bill as a whole if any of the Social Democratic proposals were adopted.³⁹ What accounts for this deep, consistent hostility?

By rejecting the Social Democratic proposals to grant a right of naturalization to certain immigrant groups, the states preserved their freedom of action, including, most important, the freedom to expel immigrants deemed "burdensome" (*lästig*). This was a freedom of which Prussia, in particular, had made extensive use. But the rejection of *jus soli* cannot be explained solely in terms of such purely practical and statist considerations. There was an important symbolic or ideological element in the absolute rejection of *jus soli* and the assertive emphasis on *jus sanguinis*. The original government proposal, for example, specified that birth to a German father (or illegitimate birth to a German mother) bestowed citizenship, "even when it occurs abroad." To the proposal to eliminate the quoted phrase as superfluous, the government responded by conceding that the phrase did not alter the legal meaning of the provision. Yet "it seemed desirable to retain it in the text in order to express unambiguously for the layman just this highest principle: that citizenship is acquired through descent without regard for place of birth."⁴⁰ Consider a second example. The original proposal contained no provision regulating the citizenship status of children of unknown parents who were found abandoned in the territory. The citizenship law of most European states contained some such provision, and there was

wide agreement that German citizenship law should have one. It was proposed in the commission that such a child "be considered a citizen of that state in whose territory he was found."⁴¹ Because of the reference to territory, however, this phrasing ran afoul of the suspicion of *jus soli*. The government expressed "grave reservations" about it, for it "would mean a breakthrough of *jus soli* at the expense of *jus sanguinis*, which had been purely and consistently carried through in the original proposal."⁴² In the end, an alternative phrasing was found that, without altering the legal force of the provision, expressed the principle of *jus sanguinis*: a child found in the territory of a state was to be presumed to be "the child of a citizen of that state."⁴³ Proof of citizenship, to take a final example, is very difficult in systems based solely on *jus sanguinis*. Since one's citizenship status depends on the citizenship status of one's parents, and their citizenship status on that of their parents, and so on, citizens *jure sanguinis* face an infinite regress in trying to prove their citizenship.⁴⁴ Noting this difficulty, the Social Democrats proposed that a person born in Germany and residing there until majority be provisionally considered German, until proof of the contrary, if his father had also resided in Germany since birth. This proposal would not have altered the bases of citizenship, only the mode of proof of citizenship. Birth and residence in the territory over two successive generations would not, under this proposal, have conferred citizenship; but they would have established the presumption that one was a citizen *jure sanguinis*. While conceding the point, the government nonetheless rejected the proposal on the grounds that it amounted to "the introduction of *jus soli* under the formal guise of a change in the mode of proof."⁴⁵

Government opposition to *jus soli* went far beyond what would be necessary or useful from a purely statist point of view. Opposition focused on the principle itself, rather than on the consequences of introducing it into citizenship law in particular and limited forms. *Jus soli* was intrinsically objectionable. Not without reason did the representative of the Danish minority in North Schleswig complain to the Reichstag, "I simply do not understand this exaggerated fear (*Ängstlichkeit*) of *jus soli*."⁴⁶ The question remains: What accounts for this deep and consistent opposition?

State-National and Ethnonational Opposition to *Jus Soli*

To understand variations in citizenship law it is necessary to consider the political and cultural meaning of *jus soli* and *jus sanguinis* as well as the legal operation of these principles. *Jus soli* defines the citizen-

territorial community, *jus sanguinis* as a community of descent. There is an affinity between *jus soli* and the self-understanding of classical countries of immigration, with its emphasis on the assimilationist workings of birth and upbringing in the territory. And there is an affinity between *jus sanguinis* and the self-understanding of Continental European nation-states. The latter affinity, however, is complex, differing for state-national and ethnonational modes of self-understanding. By a "state-national" self-understanding, I mean one in which the nation is understood as embedded in and inseparable from the institutional and territorial frame of the state. An ethnonational self-understanding, on the other hand, is one in which the nation is understood as an ethnic or ethnocultural community independent of the institutional and territorial frame of the state.

From a state-national point of view, such as was predominant in Revolutionary and post-Revolutionary France and in early-nineteenth-century Prussia, *jus sanguinis* is preferable to *jus soli* because descent creates a more substantial community than the "accidental fact" of birthplace. Descent binds the individual more closely to the destiny of the state; and the strength of the ties between state and citizen is a central concern in the age of the nation-state, particularly at the historical moment of the nation-in-arms. The nation-state demands more of its citizens than its dynastic-absolutist predecessor; it is therefore less indifferent to the composition of the citizenry. From an ethnonational point of view, the affinity between *jus sanguinis* and national self-understanding is stronger and more immediate. *Jus sanguinis* creates a community of descent; and on the ethnonational understanding, the nation is a community of descent. From an ethnonational point of view, *jus sanguinis* preserves, while *jus soli* might undermine, the identity and the substance of the nation.

Corresponding to the elective affinity with *jus sanguinis* is a "disaffinity" with *jus soli*. But this holds in sharply differing forms for state-national and ethnonational modes of self-understanding. From a state-national point of view, there is nothing intrinsically objectionable about basing membership on territorial rootedness. Birthplace alone, in an increasingly mobile age, might well be an accidental fact, and a poor indicator of enduring ties. But the same cannot be said of birthplace in conjunction with other indicators of attachment, such as prolonged residence, parental domicile, or parental birthplace. The state-national objections to *unconditional jus soli*, in short, do not extend to *conditional jus soli*. They do not extend, that is, to the type of *jus soli* that was

conditional and unconditional *jus soli* are equally objectionable. Both base citizenship on presence in the territory, rather than membership of the *ethnos*. From a state-national point of view, it is the *strength* of attachment that is decisive; hence conditional *jus soli* is acceptable, even if unconditional *jus soli* is not. From an ethnonational point of view, it is the *kind* of attachment that matters: *jus soli*, conditional as well as unconditional, is rejected because it grounds citizenship in territory rather than descent.

In early-nineteenth-century France debates on citizenship law in connection with the framing of the Civil Code expressed the state-national argument for *jus sanguinis* and the corresponding state-national critique of unconditional *jus soli*. And in the 1880s, despite a faint ethnic tinge to the debate, the state-national point of view again prevailed—a point of view that, in the political circumstances of the 1880s, not only permitted but required the transformation of second-generation foreigners into citizens through the workings of conditional *jus soli*.

The state-national perspective also prevailed in the individual German states of the early and mid-nineteenth century. All the citizenship laws adopted by these states were based on *jus sanguinis*, yet this reflected state-national rather than ethnonational considerations.⁴⁷ The same holds for the common North German citizenship that was established in 1870.⁴⁸ That law was a work of codification, not of construction. It was drafted so as to embody, as far as possible, the existing provisions of the citizenship laws of the individual German states. Since all these states attributed citizenship solely on the basis of descent, pure *jus sanguinis* was established for the North German Confederation—and for the German Empire a year later—because it was already established in the individual German states. There was no debate about whether the basic principle of *jus sanguinis* ought to be supplemented by elements of *jus soli*. That the question did not even arise is not surprising. In 1871 there were only about 200,000 foreigners in Germany out of a total population of 40 million, and there was no reason to expect substantial immigration in the future.⁴⁹ Germany was then in the midst of a substantial emigration wave: between 1864 and 1873 more than a million Germans left for overseas destinations alone.⁵⁰ The demographic vigor of the country—in the 1870s births exceeded deaths by about half a million per year—obviated the need for immigration. Substantial internal migration was expected; and freedom of movement within Germany was an intensely contested question. But substantial immigration from outside the Reich was not expected. There was thus no reason to con-

sider introducing elements of *jus soli* to complement the basic principle of *jus sanguinis*. In 1870, then, pure *jus sanguinis* had a different meaning than it had in 1913; it reflected not so much hostility to *jus soli* as indifference. The issue of *jus soli* simply did not arise. Pure *jus sanguinis* was enacted, as it were, by default.

By 1913 the demographic situation had changed dramatically. Germany remained demographically vigorous, but overseas emigration, following a last great surge in 1880–1893, declined precipitously, while immigration sharply increased. The last five years of the century showed a positive migration balance—more immigrants than emigrants—for the first time.⁵¹ By 1910 there were one and a quarter million foreigners in the Reich.⁵² Well over 200,000 of them had been born in the Reich and presumably had lived there most of their lives.⁵³ With the emergence of this substantial group of second-generation immigrants, the absence of any elements of *jus soli* became legally and politically problematic. Leading jurists noted the anomaly and recommended changes.⁵⁴ And Social Democrats, with some support from other parties, proposed giving a right to naturalization to persons born and raised in Germany. Yet, as we have seen, even the most modest proposals for the introduction of elements of *jus soli* met with the vehement opposition of the government and of conservative nationalists. To explain the depth and consistency of this opposition, we need to take account of the significant ethnonational strand in Imperial German politics.

The ethnonational rejection of *jus soli* was most clearly and directly expressed by the Conservative deputy Giese: "We are happy that the principle of *jus sanguinis* has been carried through in pure form in the law, and that therefore . . . descent and blood are decisive for the acquisition of citizenship. This provision serves excellently to preserve and defend the ethnonational [*ölkisch*] character and the German essence [of the Reich]. Consequently, we reject all amendments that seek to introduce *jus soli* in any form."⁵⁵ Neither the government nor the Reichstag majority shared this consistent ethnonational point of view. In a more subtle form, however, ethnonational considerations did decisively influence the governmental stance on *jus soli*.

The Ethnonational Perspective

As a *kleindeutsche*⁵⁶ but by no means *reindeutsche* (purely German) state, the Bismarckian Empire was doubly imperfect from the ethnonational point of view.⁵⁷ It excluded ten million Austro-Hungarian Germans, and

it included substantial non-German national minorities: French in Alsace-Lorraine, Danes in North Schleswig, and, above all, two and a half million Poles in the Prussian east. The Empire thus offered two distinct fields for ethnopolitical concerns and activities. Ethnonational politics could be oriented toward ethnic Germans outside the Reich; or it could be oriented toward national minorities within the Reich. Both varieties flourished in Imperial Germany,⁵⁸ and both contributed to the reshaping of citizenship law, the former bearing on the citizenship status of emigrants, the latter on the citizenship status of immigrants.

Ethnopolitical concern with *Volksdeutsche* outside the Reich took various forms, ranging from purely cultural efforts to preserve and support German schools, language, and culture abroad, to demands for state intervention on behalf of beleaguered ethnic Germans abroad, notably in the Baltic region and in Hungary, and, at the extreme, to renewed *grossdeutsche* demands to bring Germans excluded from the Bismarckian settlement into the Reich. The purely cultural activities—for example, those of the German School Association⁵⁹—received widespread moral but little material support. And they did not touch fundamental issues of Imperial German politics. The *grossdeutsche* project, on the other hand, did address fundamental issues; it challenged the right of the Empire to legitimate itself as a nation-state.⁶⁰ Yet despite its revival in the last years of the nineteenth century, the *grossdeutsche* project remained marginal.⁶¹ Bismarck had set the tone by emphatically rejecting not only further territorial expansion in Europe but also all demands for state intervention on behalf of *Volksdeutsche* abroad; his successors adhered to the same policy. Only the collapse of the Habsburg Empire reopened the fundamental question of the fit between nation and state.

Informing both the purely cultural support for the ethnic Germans outside the Reich and the demand for state intervention on their behalf was a sense of ethnonational community that was indifferent to distinctions of formal citizenship, a sense of nationhood that transcended—and, in the case of the *grossdeutsche* project, challenged—state boundaries. This ethnocultural understanding of nationhood was not the only or even the dominant one in Imperial Germany. In the crucial domain of international politics, nationalism and national consciousness were framed by and oriented toward the territory, the institutions, and the citizenry of the state, not to the crosscutting category of the ethnocultural nation.⁶² Yet the new state-centered nationalism did not displace the old ethnocultural understanding of nationhood. The two coexisted uneasily. This is reflected in the ambiguity of such terms as “national” and

“German” in Imperial Germany, which sometimes referred to the state and its citizenry as a whole, sometimes to ethnocultural Germanism alone. It was just such a mixture of state-national and ethnonational assumptions that underlay the widespread support for making citizenship more accessible to *Auslandsdeutsche* and their descendants.

Complementing ethnopolitical support for *Volksgerossen* (ethnocultural “comrades”) outside the Reich was ethnopolitical concern about *Volksfremde* (ethnocultural foreigners) inside the Reich. The former sought to preserve Germanism abroad, the latter to preserve Germanism at home, by maintaining or strengthening the German character of the Empire, by Germanizing its ethnic borderlands, especially in eastern Prussia.⁶³ Prussian-German *Polenpolitik*,⁶⁴ to be sure, was informed by state-national as well as ethnonational concerns. Indeed, the very existence of the Reich, in its *kleindeutsche* but not *reindeutsche* form, represented a triumph of the state-national over the ethnonational principle. As the Poles themselves pointed out, a consistent application of the “principle of nationality,” according to which state boundaries should reflect ethnocultural boundaries, would have barred the incorporation of the Polish districts of Prussia into the Reich. The Poles accused the Germans of inconsistency. While Germans appealed to the principle of nationality to justify the incorporation of ethnocultural Germans in Alsace-Lorraine, they flouted this principle in the Prussian east. To this ethnonational protest against incorporation into the new German Reich, Bismarck replied in classically statist terms: the Poles belonged “to no other state and to no other people than the Prussian, to which I myself belong.”⁶⁵

Theodor Schieder has argued that Prussia’s assimilationist language policy in the decades after the establishment of the Empire expressed the state-national political philosophy according to which the unitary and homogeneous nation is the deliberate and artificial creation of the state, rather than something prior to and independent of the state.⁶⁶ What Schieder does not sufficiently emphasize, notwithstanding his subtle and illuminating analysis, is the impossibility, after the unification of Germany, of a consistent state-national outlook and practice in the Prussian east. Even before unification, Prussian *Polenpolitik* was not—and could not be—confidently assimilationist in the manner of the French state vis-à-vis peripheral regional cultures and immigrants. The late-eighteenth-century partitions of Poland had saddled Prussia with a fiercely independence-minded nobility, who vigorously protested moves toward full administrative incorporation into the Prussian state as well as incipiently assimilationist language policies.⁶⁷ Still, it had been possi-

ble to treat Poles as Prussians (even if as Prussians who were particularly refractory to administrative centralization). But it was impossible, after unification, to treat Poles consistently as Germans or Germans-in-the-making. The Polish presence was simply too large, too consolidated, and—increasingly—too defiantly nationalistic.⁶⁸

Prussian-German *Polenpolitik*, as a result, was informed by a mixture of state-national and ethnonational assumptions. While the former were assimilationist, the latter were essentially "disimilationist." After the mid-1880s, except for a break in the early 1890s under Caprivi's chancellorship, the latter gained in importance, especially with the emergence of a more intransigent German nationalism and a popular Polish counternationalism. Increasingly, in habits of thought, political rhetoric, legal texts, and administrative practice, Poles were distinguished from other citizens of the Reich. "National" and "German" were used less often in their inclusive state-national meaning and more often in their discriminatory ethnonational meaning. The *Reichspolen*—Polish-speaking citizens of the Reich—were characterized as Poles, or, in more cautious public formulations, as our "Polish fellow-citizens," certainly not as Germans or German citizens *tout court*; they were stigmatized as *Reichsfeinde* (enemies of the Reich); they were legally and administratively treated as second-class citizens.⁶⁹

The Vicissitudes of Prussian-German Polenpolitik

It is difficult to distinguish ethnonational from state-national concerns in Prussian and German *Polenpolitik*.⁷⁰ Yet one can discern a shift in accent from the statist concern to secure the political loyalty of Poles to the Prussian (and later the German) state, to a nationalist concern to Germanize the *Reichspolen*, and ultimately to an ethno-demographic concern to Germanize the eastern territories of the Reich by colonization.⁷¹ Even under Bismarck there are significant traces of this shift in accent. Bismarck's distance from the ethnonational point of view is well known.⁷² Yet he was not equally distant from the two sorts of ethnonational concerns I have distinguished. Toward the national aspirations of Germans outside the Reich, Bismarck was indifferent; toward demands for intervention on their behalf, or, in the case of Austro-Germans, for their incorporation into the Reich, he was hostile.⁷³ This hostility was based on considerations of both foreign and domestic policy. On the one hand, Bismarck wanted to assure the international community of the "saturation" of the Reich and of its lack of interest in further territorial acquisitions; on the other hand, he wanted to preserve North German-

Protestant-Prussian dominance in the Empire and was resolutely opposed to residual *grossdeutsch* demands for the incorporation of the Austro-German Catholics.⁷⁴

Yet toward the internal ethnonational composition of the Reich, and more particularly the Prussian east, Bismarck was by no means indifferent. The *Kulturkampf* had a crucial anti-Polish dimension. On Bismarck's own account, it was the "rapid advance of the Polish nationality at the expense of the German in Poznań and West Prussia" that moved him to launch the *Kulturkampf*.⁷⁵ Historians have discounted this explanation, emphasizing instead Bismarck's desire to isolate Catholic France by strengthening ties with anticlerical Italy and Orthodox Russia; or his manipulative internal coalition-building strategy of "negative integration," based on the branding of the Catholic Center Party (and later the Social Democrats) as *Reichsfeinde*;⁷⁶ or (as context) the general European conflict between militant liberalism, allied with the secular state, and a Church that had recently condemned liberalism in the Syllabus of Errors and asserted papal infallibility. Yet whatever occasioned the *Kulturkampf*, there is no doubt that, in the Prussian east, it took the form of a campaign against Polish nationality as well as against the Catholic Church and the Center Party.⁷⁷

The Prussian School Supervision Law of 1872, which placed all schools under the supervision of state-supported school inspectors, was directed chiefly against the Polish clergy, whose dominant influence in the schools of Poznań and parts of West Prussia and Silesia Bismarck blamed for the "Polonization" of those regions. This measure was grounded in state-national rather than ethnonational concerns. Unlike his National Liberal allies, Bismarck did not view Germanization as intrinsically necessary or desirable. He sought to weaken Polish nationalism, which he viewed as a threat to the Reich, rather than to suppress Polish nationality. To weaken Polish nationalism, in Bismarck's view, it was necessary to attack its traditional social carriers: the clergy and the nobility. Yet other measures of the *Kulturkampf* era were aimed more broadly against Polish nationality as such. In 1872 Bismarck proposed to expel all noncitizen Poles from Prussia. Although not carried out at the time, this proposal anticipated the mass expulsions of the 1880s.⁷⁸ In 1872 and 1873 German was made the compulsory language of instruction for all subjects in elementary schools in Upper Silesia and West Prussia, and for all subjects except religion in Poznań. Polish-speaking teachers were transferred from the east to other parts of Prussia. And in 1876 German was made the sole language of public life.⁷⁹

To some extent these measures too could be justified in state-national

terms. The insistence on German as the medium of elementary-school instruction was, for Bismarck, a means of ensuring competence in German and thereby exposure to German-language public discussion, which, he thought, would promote loyalty to the Prussian state and the German Reich.⁸⁰ And the imposition of German as the sole official language (*Staatssprache*), it was argued, did not entail a desire to curb Polish as a popular language (*Volksprache*).⁸¹ Yet the harsh, compulsory character of the new school and public language legislation marked a sharp break with previous Prussian policy. Even Oswald Hauser, while emphasizing the statist orientation of Bismarck's Polish policies, admits that the language legislation "brought the Prussian government to a most dangerous borderline between a policy of energetic defensive measures against a danger to the state, and national intolerance aimed at a homogeneous nation-state."⁸²

Here the relative weight of state-national and ethnonational motives and motifs in Bismarck's *Polenpolitik* is less important than the change in the basic orientation of Prussian-German *Polenpolitik* between the partitions of Poland in the late eighteenth century and the early twentieth century. The change pivoted on the unification of Germany.⁸³ Until 1848, and to a considerable extent until 1866, the fundamental aim was to make loyal Prussian subjects out of Poles. The means to this end varied widely from benign neglect to intrusive bureaucratic centralism, and from support for Polish language and culture to efforts to foster German language and culture, the latter supported by the untroubled conviction of German cultural superiority. But even at its most assimilationist, policy aimed at Prussianization, not Germanization. What Hagen writes of the late eighteenth century was true through the middle of the nineteenth: "The national question was essentially one of patriotism. What counted was neither language, nor secular aesthetic or literary culture, nor religion, but rather loyalty and devotion to the state."⁸⁴

Loyalty to the Prussian state was one thing, loyalty to a German nation-state another altogether. Even the former, it was clear after 1848, was not to be hoped for from the independence-minded Polish nobility and clergy.⁸⁵ The latter was much more problematic. In the constituent North German Reichstag in 1867, Polish deputies objected to incorporation in a German nation-state: "What common part, for heaven's sake, can we have in a nationally based federation that exists to represent, defend, cultivate, and further common German interests?" And again in the German Reichstag of 1871: "We want to remain under Prussian rulership, but we do not want to be incorporated into the German Reich."⁸⁶

Bismarck continued to hope that ordinary Poles—peasants and an emerging middle class—might become loyal citizens of the Reich, if only they were insulated from Polish-nationalist propaganda of the nobility and clergy.⁸⁷ Hence the special severity of antiericler measures in Polish districts; hence the language policies mentioned earlier; and hence Bismarck's support, in 1886, for a "Settlement Law" that committed state funds to buy up Polish estates and settle German colonists on the lands.⁸⁸

The Settlement Law was an ambiguous measure. It could be justified as a weapon against the Polish nobility, or it could be considered a weapon against the Polish population as such. For Bismarck, it probably had the former meaning; but for the National Liberals and other nationalists who supported the bill, it clearly had the latter.⁸⁹ The Settlement Law marked a new phase in *Polenpolitik*, in which ethnodemographic interests came to the fore. This occurred with the increasingly general acknowledgment of the failure of attempts at assimilation.⁹⁰ The failure was twofold. That Prussian-German *Polenpolitik* had failed to make Poles loyal German citizens was shown by the development of a mass-based Polish nationalism;⁹¹ that it had failed to make Poles German-speaking citizens was shown by census data recording increasing concentrations of Polish speakers in the Prussian east.⁹² Having failed to win the political loyalty of the Poles and to assimilate them to German culture, the government now sought to displace Poles by Germans in the eastern frontier districts, lest these districts become increasingly Polish. Having failed to Germanize the people, it now sought to Germanize the soil, to build a "living bulwark against the Slavic flood."⁹³

Even before the inauguration of the internal colonization program, the new ethnodemographic inflection of Prussian-German *Polenpolitik* was apparent in the mass expulsions of 1885.⁹⁴ Bismarck's chief concern was with nationalist agitators among the immigrants. But he and his ministers were moved by ethnodemographic concerns to undertake an indiscriminate mass expulsion of noncitizen Poles and Jews, without regard to political activity.⁹⁵ As Bismarck and Prussian Culture Minister Gossler wrote in an administrative letter to Interior Minister Puttkamer, demanding the general expulsion, "even the [Polish] masses who remain untouched by political agitation disturb our state organism by Polonizing the border provinces, whereas our state task [*staatliche Aufgabe*] is to Germanize them." Defiantly defending the expulsions in the Prussian *Landtag*, moreover, Bismarck put it more bluntly: "we want to get rid of foreign Poles, because we have enough of our own."⁹⁶

Although the internal colonization program inaugurated a year later was to endure until the outbreak of war and result in the resettlement

of over 20,000 peasants—with their families a total of 120,000 Germans—it failed to achieve its aims.⁹⁷ First, the counterorganization by the Polish community of credit and “parceling” associations enabled Poles to outdo Germans in their own game of estate subdivision and peasant colonization. Second, powerful currents of internal migration continued to draw more Germans than Poles from the agrarian east to the industrial districts of western Germany. The evident failure to gain ground in the “struggle for the soil” engendered a demand for harsher measures.⁹⁸ A law of 1904 required local administrative approval for all “new settlements.” This discriminated blatantly against Poles, in view of the formal government order of 1898 making the “furthering of Germanism” (*Förderung des Deutschthums*) a duty of administrative officials.⁹⁹ Discriminatory legislation culminated with the Expropriation Law of 1908 permitting expropriation as a means of “strengthening Germanism” in West Prussia and Poznan.¹⁰⁰ Restrained by sharp criticism of the law in Germany and abroad, the Prussian government used these powers of expropriation only once, in 1912; and this, like the mass expulsions of 1885, occasioned a formal resolution of censure in the Reichstag.¹⁰¹ But the law itself was eloquent testimony to the bitterness of the nationality struggle in the prewar years. It was this hard nationality struggle—this standoff between mobilized and opposed nationalisms—that formed the backdrop to the revision of citizenship law, especially to the debates about *jus soli* and naturalization policy.

Migration and Nationality

The politics of ethnocultural nationality in the Prussian east was linked to both internal and international migration. Internal migration has already been mentioned. The most important reason for the demographic gains of Poles at the expense of Germans in the Prussian east was their differential rates of out-migration. Both groups left the agrarian east for the higher wages of the industrial west in the late nineteenth and early twentieth century, but Germans at considerably higher rates than Poles. By the 1880s the aggregate emigration rate was high enough to cause a labor shortage, which steadily intensified until the outbreak of war. For labor, the agrarian interests turned to immigrants from Russian and Austrian Poland, but this only accentuated the ethnationally shift caused by the disproportionate out-migration of Germans. This process had already begun in the 1880s, and concern over its consequences for the “Polonization” of the Prussian east was among the

factors leading to the mass expulsions of 1885. The expulsions occasioned agrarian protests, though not particularly vehement or sustained ones, for the labor shortage was not yet acute, and Bismarck was able to ignore them.¹⁰²

Following the expulsions of 1885, further Polish immigration was banned. Yet the labor shortage intensified, not only because of continued migration to the industrial west, but also because of the displacement of extensive by intensive cultivation, of grain by sugar beets in the Prussian east. The pressure of agrarian interests for the readmission of Polish labor increased in the late 1880s. In 1890, after Bismarck's fall, a compromise was reached that seemed to satisfy both the economic interest in expanding the labor supply and the political interest in preventing further erosion of Germanism in the Prussian east. Russian and Austrian Poles were readmitted, but under strict conditions intended to prevent their permanent settlement. Only unmarried Poles were admitted; they were restricted to agricultural work in frontier districts; and, most important, they were required to return to Russia or Austria during the winter.¹⁰³ Seasonal migrant labor seemed suited both to the new intensive agriculture, with its large seasonal variations in labor demand, and to the nationalist desire to prevent immigrant Poles from reinforcing the Polonization of the Prussian east.¹⁰⁴ Yet even this arrangement was objectionable from the nationalist point of view. Max Weber claimed that not all seasonal workers in fact left the country in the winter, that even seasonal migration opened the door to harmful settlement. Moreover, he argued, even if strictly seasonal migration were enforceable, it would still be objectionable. For it would displace German workers and their families who could not compete with the Poles, whose modest wants reflected their “low cultural level.” This would induce further internal emigration of Germans and reinforce the demand for immigrant Poles. Weber therefore demanded the “absolute exclusion of Russian-Polish workers from the German east.”¹⁰⁵ In general, nationalistic conservatives remained opposed to Polish immigration—even for seasonal agricultural work—until the outbreak of war.¹⁰⁶ But in vain: seasonal migration increased steadily in the prewar decades; by 1913 about 240,000 Polish seasonal workers were employed in Prussian agriculture.¹⁰⁷

Only about 40 percent of all foreign workers in Prussia in the early twentieth century were employed in agriculture,¹⁰⁸ and only about two-thirds of these were Poles. Of the larger number of foreign workers in industry, mining, and other sectors, only 5–10 percent were Poles. Data

on ethnic nationality are not available from other German states. Yet the fact that Prussia accounted for between three-fourths and four-fifths of all foreign workers¹⁰⁹ and that Poles comprised a higher proportion of the foreign workforce in Prussia than elsewhere means that only about a third of all foreign workers in Germany were Poles. And since most of the Poles were seasonal agricultural workers, a much smaller fraction of all resident foreigners were Poles. Yet public discussion of immigration was dominated by the question of Polish agricultural migration into Prussia, and, more generally, by the idea of a massive flood of Slavic and Jewish immigrants from the east.¹¹⁰ Immigration was seen through the prism of the nationality conflict.¹¹¹ To the extent that it did not engage the nationality question, immigration in Imperial Germany was uncontroversial and largely invisible. This identification of immigration as such with a particular component of the immigrant flow—with the ethnationally undesired Slavic and Jewish migration from the east—was one of the underlying assumptions that shaped the debate about citizenship law.

Nationality and Citizenship

The vehement rejection of every trace of *jus soli* by the government and conservative parties during the shaping of the law of 1913 can be understood only in the dual context of Prussian-German *Polenpolitik* and the nationality struggle in the Prussian east; and the partly real and partly imagined Slavic "*Drang nach Westen*" (drive to the west) that, reversing the historic German "*Drang nach Osten*," threatened, in nationalist perspective, to flood Germany with millions of Slavs and Jews. Legally these were entirely distinct. The former was a question of *Minderheitenpolitik* (minorities policy) toward German citizens who happened to be ethnocultural Poles; the latter a question of immigration policy toward foreign citizens. Socially and politically, however, they were inseparable. Immigration was perceived—and misperceived—in an ethnopolitical perspective oriented toward the nationality struggle in the Prussian east; and the nationality struggle was fundamentally conditioned by the dynamics of interregional and international migration. Both *Polenpolitik* and immigration policy were shaped by deep assumptions about ethnopolitical struggle in that historic zone of ethnopolitical tension: the German-Slav borderlands of central Europe.¹¹²

The politics of citizenship was shaped by the same assumptions. Naturalization policy was subordinated to immigration policy. In order

to prevent the permanent settlement of ethnopolitically undesired migrants, it was essential, as a last resort, to prevent their naturalization. Since individual German states conducted largely autonomous naturalization policies, Prussia—as the state most directly concerned both by the nationality struggle and by immigration from the east—was free to pursue a particularly restrictive policy toward Poles and Jews. As early as 1881 Interior Minister Puttkamer instructed governors of Prussia's eastern provinces to grant German citizenship to Russian subjects—almost all of whom were Poles or Jews—only in exceptional cases. And in early 1885, as the mass expulsions were being planned, Bismarck forbade the naturalization of Russian subjects anywhere in Prussia.¹¹³ Exceptions were still permitted in particular circumstances, so the Prussian Interior Minister, concerned that local officials were interpreting this too liberally, decreed in 1895 that all naturalizations would have to be approved in advance by his office.¹¹⁴ Since this proved too cumbersome, central approval was required after 1899 only for suspect categories: clergy, Poles and Moravians, and Jews (not only those with Russian but also those with Austrian citizenship). This policy remained in force until the war. As Wertheimer shows, the policies of Saxony and Bavaria—the other German "frontline" states directly exposed to immigration from the east—were equally restrictive. And archival materials, including naturalization files and internal administrative reports, enable him to show that practice was as restrictive as these policy guidelines.¹¹⁵

Naturalization policy in the larger German states had a pronounced ethnopolitical component; chances for legal citizenship depended on ethnopolitical nationality. A Bavarian decree of 1871 made this explicit. Naturalization policy was to be liberal except with respect to "elements that as a consequence of their economic, political, or national status are viewed as unwanted additions to the population."¹¹⁶ These ethnopolitically "unwanted elements" were those who had for centuries shared with Germans the zone of ethnopolitically mixed settlement on the eastern and southeastern frontiers of Germany: Slavs (above all, Poles) and Jews. They were unwelcome because Germany already had a nationality problem and migration—especially permanent immigration, sealed by naturalization—was expected only to make it worse. "If Prussia follows a firm [*feste*] practice in naturalization," argued a representative of the Imperial Interior Ministry in the 1913 debate, responding to charges of Prussian anti-Semitism, "this is not determined by religious considerations; it occurs on national grounds, in order to hold back the stream of foreigners from the east who seek to enter our land."¹¹⁷

The same ethnonational assumptions that underlay the restrictive naturalization policies of the individual German states—the same concern to protect Germanism against an influx of eastern Poles and Jews—informed the vehement opposition to *jus soli* at the level of the Reich. In the German context, it will be recalled, the *attribution* of citizenship *jure soli* was not even discussed; it was out of the question. The debate about *jus soli* was a debate about whether persons born and brought up in Germany should have a right to naturalize. The Social Democratic proposals to this effect, according to Dr. Lewald of the Imperial Interior Ministry, “completely overlook the particular geographic situation of the German Reich”: “We stand in a completely different situation than the other European nations The pull of nations [*Zug der Nationen*] goes largely from East to West, and the Eastern masses who are set in motion by this pull first run into [*stossen auf*] the German Empire . . . , with its flourishing economy, with its free institutions [laughter from Social Democrats] . . . , with its highly developed social policies that treat foreigners and citizens equally. . . . It is therefore only natural that the push to be admitted to the German Reich is an extraordinarily strong one among many elements of the eastern European population.”¹¹⁸

The specter of mass migration from the east was raised not only by the government and the conservative nationalist parties.¹¹⁹ Even the National Liberals and the Center Party, who had criticized Prussian naturalization policy for excluding Jews, rejected a right of naturalization for foreigners and alluded to the dangers of the flood from the east.¹²⁰ Thus a Center party deputy: “We distance ourselves from all anti-Semitism But you will understand that we do not want a massive naturalization of Galician peddlers [*Hausierern*]. The religious aspect is of no concern here. But such a mass naturalization would be no gain for Germany. Just as little do we want the mass naturalization of thousands of destitute agricultural workers who come from the east to work on the harvests We are obliged to protect our communes from the naturalization of morally or economically questionable [*bedenklich*] elements.”¹²¹ Without mentioning them explicitly, Belzer was referring to Jews (peddlers) and Poles (agricultural workers) and rejecting Social Democratic proposals for *jus soli* because they would open the door too widely to the naturalization of these “questionable elements.”

In the final round of the debate the government reiterated its opposition to the Social Democratic proposals to ease access to citizenship for “ethnically foreign [*stammfremde*] elements”:

While the tendency of the government proposal is to facilitate the preservation and hinder the loss of citizenship on the part of Germans living abroad and their descendants, the discussions [in the Reichstag] manifested for a certain time the opposite tendency, [namely] to ease the acquisition of citizenship on the part of ethnically foreign [*stammfremde*] elements. [The Social Democrats] went so far as to propose that foreigners, under certain circumstances, be given a right to naturalization. The federated [state] governments had to take a stand against this tendency; and on their behalf I expressly reject this tendency today The Social Democratic proposals would break through the hitherto upheld principle [of *jus sanguinis*]. I note expressly that these proposals [if adopted by the Reichstag] would make the proposed law unacceptable to the federated [state] governments.¹²²

The emphatic rejection of *jus soli*, like the strict state naturalization policies, had a clear ethnonational inflection. It reflected the concern of “frontline” states—above all Prussia, but also Saxony and Bavaria—and of the Prussian-dominated Reich to preserve ethnic Germanism in the eastern borderlands of the Reich in the face of a perceived double threat: from the Polish-nationalist *Reichspolen* in the Prussian east, and from the flood of would-be immigrants into the Prussian east. The nexus between immigration, citizenship, and nationhood was very different in Wilhelmine Germany and late-nineteenth-century France. The French formula of unitary state-nationhood permitted and (in the special political circumstances of the early Third Republic) required the transformation of immigrants into citizens, just as it permitted and required the transformation of “peasants into Frenchmen.” In turn-of-the-century Germany, however, the discrepancy between ethnocultural nationhood and state territory—and the concern, arising from this discrepancy, to nationalize the state’s population—required the exclusion of eastern immigrants (who, in the public mind, stood for all immigrants) from settlement and from citizenship.