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Editorial: Naturalisation policies beyond a Western focus

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Abstract
Naturalisations do not happen automatically – unlike the acquisition of nationality at birth – but must be brought about deliberately. The varying ways naturalisations are organized in any society therefore offer an opportunity to gain clues as to which criteria are assumed to be relevant for the respective definition of national belonging. This introduction argues that most research on naturalisation still focusses on Western states, and that theories of naturalisation are largely derived from Western cases. It describes the ethnocentric bias of much of the universalizing comparative research on naturalisations, and outlines the main reasons for the lack of research beyond the West. It then presents the articles on naturalisation policies in the Global South brought together in this special issue. The contributions analyse ethnically exclusive nationality laws in Liberia and Israel; selective two-tier regimes of immigrant incorporation in Hong Kong and Singapore; investor citizenship schemes which are much more common in the Global South than in the North, exemplified by the case of Mauritius; and Mexico, whose norms assign naturalised Mexicans the status of "second-class citizens".

Keywords: naturalisation; citizenship; nationality; politics of belonging; Global South.

Naturalisations: taking the alienage-nationality nexus to investigate national politics of belonging

At the core of the nation-state principle, which by now encompasses the whole globe, stands the assignment of each individual to (usually only) one nation-state. Foreigners have to naturalise in the country of destination if they want to become equal members at least nominally. Only through the acquisition of nationality[1] can they gain access to most citizenship rights, most notably the

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[1] Nationality, in accordance with international law, is understood as the legal relationship between individuals and states. In some domestic legal systems this meaning is subsumed under the term *citizenship* (Bauböck et al., 2006: 2). Some scholars prefer to avoid the term *nationality*, because in some languages it connotes ethnicity, and utilize *citizenship* instead. Yet, "citizenship is a legal identity oriented inwards to rights and obligations within the state, while nationality is a state-certified membership oriented outwards to other states" (FitzGerald 2005: 172). In line with latter definition, the term *nationality* is preferred here to solely express the formal membership of an individual in a state.

security of residence and the right to vote. From the perspective of the national state administration, an equal legal status for every member of the population resident within national territory is often seen as necessary to maintain social cohesion. Nevertheless, to incorporate foreigners as equal members of society can pose a threat to the unity of the imagined nation, especially when the new members are perceived as ethnically or culturally different. Therefore criteria must be set as to who belongs and who does not. Naturalisation is the legal process of acquisition of a nationality, not automatically at birth, but later in life (and then usually in substitution for or in addition to an existing nationality). From the perspective of a particular state, to naturalise means to confer on an individual a legal membership status.[2] The usual requirements are to be of legal age, to be lawfully present inside the country, and to have resided there for a minimum duration; the latter can vary considerably, e.g. from one year in the case of Portuguese wishing to naturalise in Brazil, to as much as 25 years in Qatar. The period of residency requirement is often lower for a spouse or a child of a national and for former nationals, and sometimes also for those seen as co-ethnics (indeed, it may even be that naturalisation is only possible for those categorized as of the same "race", see Ludwig, this issue). These basic requirements are usually accompanied by proof of "good conduct" (operationalized as a clean criminal record), often (but not always) by possession of a permanent residency permit, and sometimes by the demonstration of either a minimum economic self-sufficiency or, on the contrary, an outstandingly high economic contribution by the applicant (as in a two-tier immigration systems like in Hong Kong and Singapore, see Leung and Mathews/Soon in this issue). Additional naturalisation requirements are proficiency in (one of) the official language(s) and/or country knowledge (which may or may not be rigorously tested – again, as in Singapore). Alongside these requirements for regular naturalisations, many states allow for "special naturalisation" at the discretion of the executive for those with exceptional achievements in favour of the country (in the past, often war heroes; today, football stars and other athletes). What is more, an increasing number of states "sell" their nationality to rich foreigners if the latter invest large amounts of money inside the respective country, whereby some or all other requirements are waived (Dzankic, 2012; van Fossen, 2007; see Ramtohul in this issue on investor citizenship in Mauritius).

Naturalisations are more than just one aspect of the complex national "politics of belonging", to borrow a term coined by Brubaker, among others.[3]

[2] The word "natural" in the term *naturalization* originally expressed the acquisition of a status equal to that acquired by birth. It hence symbolically underlines that someone is being made a "natural" member of a state, while in fact the global state system and its concomitant membership regulations are anything but natural or self-evident.

[3] See Crowley (1999); Anderson et al. (2011); Yuval-Davis (2011). Brubaker argues that the (negotiations of) criteria to define membership in a nation-state are, obviously, closely related to negotiations of rights and obligations as citizens, but nevertheless "the politics of citizenship *in*

Unlike nationality at birth, naturalisation is neither automatic nor random (i.e. not determined by place of birth or status of the parents, or a combination of both), but must be brought about deliberately. To a varying degree, the person concerned can influence her naturalisation, or at least it is dependent on the activity and some characteristics of the individual. Therefore, the way naturalisations are organized in any society offers a particular opportunity to gain clues as to which criteria are assumed to be relevant for the respective definition of national belonging. Apart from the fact that naturalisations help draw the boundaries of a symbolic membership status, they are made explicit (as laws), and the rules governing these policies have been controversial issues in many places in recent years. This makes them a prime subject for the study of national policies of belonging. The works gathered in this special issue follow this line of argument and share a common perspective on the acquisition of nationality: they investigate what forms of relationships and affiliations are privileged over others; what ideals of collectivity and solidarity are seen as legitimate; and what assumptions of difference and foreignness impede national belonging.

With transnational migration on the rise (Glick Schiller, 2008), research on migration patterns and migrant incorporation has increasingly managed to overcome the limitation of a sole focus on national policies and of the concomitant state-focused theory-building (also termed *methodological nationalism*, Wimmer & Glick Schiller, 2003). Yet the tendency to include developments that transcend national containers should not lead to a neglect of nation-state powers – or, in other words: there is no sign that the global state system has actually reached a post-national order (see Favell, 2006; Hansen, 2009; Weil, 2012). On the contrary, formal nationality does still matter, because the nation-state "remains the decisive locus of membership even in a globalizing world; struggles over belonging in and to the nation-state remain the most consequential forms of membership politics" (Brubaker, 2010, p. 76). Here it is not necessary to repeat all arguments in this regard; suffice it to mention the most notable consequences of national membership. It is certainly true that foreign permanent residents often enjoy rights similar to those of nationals, such as access to the labor market and to social security. But political activity by foreigners is strongly restricted in most countries, and voting rights are usually reserved for citizens.[4] Another important aspect, yet often ignored by scholars, is the security of residence. Even permanent residents are subject to forced removal if they're convicted of a crime, or sometimes even if they rely

the nation-state can be distinguished analytically from the politics of belonging *to* the nation-state" (Brubaker 2010: 64).

[4] Many states exclude all foreigners from the ballot boxes; in most cases non-citizen voting rights are confined to local elections or the active suffrage (Hayduk, 2006). When studying 25 democratic states in 2003, Earnest (2003) found full equation of foreigners with nationals in only two countries: New Zealand and Uruguay.

on welfare benefits.[5] Only nationals are protected from being physically removed from the territory.[6]

Empiric research on naturalisation

During the last decade, nationality policies in many countries (most visibly perhaps in Western Europe) have attempted to attach more symbolic weight to the procedure of naturalisation. Through introducing language- or country-knowledge tests and inventing new rituals, such as citizenship oaths or ceremonies, amendments to nationality laws have striven to attach more profound meaning to the process of becoming a citizen.[7] In this process, national administrations are inspired by the practices of other states, and even copy each other outright, to the extent that there is some convergence, for instance in the use of naturalisation tests and ceremonies in the Western world.[8]

But what is happening in other regions? In Singapore, to name an example of a country successfully attracting international migrants, the public policy of immigrant admission and naturalisation explicitly trains would-be citizens in national values and history using a naturalisation procedure called the "citizenship journey". The prime importance given to naturalisations as a means to shape national populations is not unique to this South East Asian country, as the articles in this special issue show. This is illustrative of the need to analyse naturalisation policies beyond the "classic" countries of immigration. With regard to western countries, scholarly interest in naturalisation has during the last decade entered into a theoretical debate on whether negotiations of nationality and naturalisation (law) can be explained by understandings of nationhood, or whether they are primarily shaped by structural conditions like demographic or economic patterns or institutional configurations, or are temporary and alterable outcomes of momentary political decisions. As much as the theorizing of nationalism has profited from the broadening of perspectives through non-Western cases and concepts during the 1990s (Chatterjee, 1986; Tønnesson & Antlöv, 1996; Chakrabarty, 2000), research on naturalisations as a way of approaching concepts of nationhood and politics of national belonging can profit from expansion beyond a Western focus.

In line with this observation, this introduction argues that theories of naturalisation have been largely derived from interaction with cases in the West. It will go into the ethnocentric bias of much of the universalizing comparative

[5] Kanstroom frames this as "post-entry social control" (Kanstroom, 2012: 28–49). On deportation in general see Anderson et al. (2013).

[6] Accordingly, deprivation of nationality has been put on the agenda again in some European states since 9/11; see Gibney (2013) on the policy of denaturalisation in the UK; on denaturalisation in German history see Gosewinkel (2001: 369–420); in the US, Weil (2013).

[7] This has been interpreted as attempts to make national membership "thicker", e.g. to make representations of particular national histories and cultures more distinguishable from each other (Kostakopoulou, 2006; Goodman, 2012).

[8] On the transfer of the concept of citizenship ceremonies between the UK, Canada, and Australia see Damsholt (2008) and Byrne (2014).

research on naturalisations, and will argue that particularly the evaluation of restrictive naturalisation policies has so far been biased by a Western focus. Explicitly restrictive naturalisation (and more generally, nationality) policies are not confined to the West, but are a feature of boundary maintenance in other regions of the world, too. Such ethnic or economic exclusivity is often not taken into account by Western scholars, much in line with the neglect of non-Western racism in immigration restrictions (see Webb, 2015). Many cross-national (implicitly or systematic) comparisons are tilted towards taking the West as the measuring rod. The cases examined in this special issue substantiate this finding: ethnically exclusive nationality laws in Liberia and Israel; selective two-tier regimes of immigrant incorporation in Hong Kong and Singapore, typical of the South-East Asian striving economies; investor citizenship schemes which are much more common in the Global South than in the North, exemplified by the case of Mauritius; and Mexico, whose norms assign naturalized Mexicans the status of "second-class citizens".

Universal explanations of nationality and naturalisation policies

Since Rogers Brubaker's comparative study of nationality in France and Germany, published in 1992 (Brubaker, 1992), many studies have engaged with the question of how to make sense of varying patterns of nationality law in different, primarily Western, nation-states. Some scholars are currently searching for theoretical models that universally explain nationality policies, including naturalisation law and practice (for an overview on comparative approaches that come up with "causal explanations" of such variations see Janoski, 2013, p. 386). Such a quest for universal explanations is challenging; firstly because its theoretical tools are developed from Western perspectives; secondly because the universalist approach relies primarily on quantitative data that are currently not available for most regions of the globe.

Lack of research beyond the West

Comparative studies of naturalisations, which strive to explain policy differences, are still dominated by studies on Western polities.[9] Their theoretical tools are developed from academic perspectives of the "classic" West (the "West of the Cold War", see Lewis & Wigen, 1997: 50). Its main focus has so far been on "settler-colonial" countries (Bashford, 2014: 34) or the "classic immigration countries" (Castles & Miller, 2009: 250), while for instance

[9] Some studies that explain naturalisation policies primarily take laws and regulations into account (in political science, this is called the *output* of a policy). As an example, a comparative study on the EU discusses the reasons why naturalisation tests were introduced, see van Oers et al. (2010). For other studies, the driving question is to explain variations in naturalisation rates across different countries by relating the numeric *outcomes* to their respective specific legal setups (Weil, 2001), or to the structure of their immigrant populations (Bloemraad, 2006 compared the US and Canada). This is also frequently done as a comparison of naturalisation rates between different groups within the population of one country; see on the USA Bloemraad and Ueda (2006); on Germany Street (2014). Yet other studies combine outputs and outcomes; for instance by taking into account the "Five Dimensions of Implementation" by Huddleston (2013: 3).

countries of emigration have not been "adequately" addressed (FitzGerald, 2005: 171). From a global perspective, this is still fragmentary, as most research has been done on comparatively few cases, almost all of them OECD member states.[10] Such a theory, with its origins in the North, must be tested against Southern perspectives, but not as derivations of "normal" Northern models. Scholars have pointed rightly to the problem of "projecting North Atlantic perspectives and understandings onto data from the rest of the world" (Connell, 2011: 288). Only if existing theories prove to be applicable to the naturalisation policies of Mexico, Singapore, or Mauritius (to mention just a few examples), can they then be applied globally with some degree of confidence.

Because of its focus on the West, much of the existing literature produces regionally specific theoretical elements that lead to a distorted picture with regard to access to nationality, both at birth and later in life, and theoretically disprivileges divergent cases in other regions of the world. I will look at a few extreme cases beyond the "classic" West to illustrate how the resulting overall picture is misleading. The model derived from the context of (Western) Europe and USA/Canada/Australia is necessarily distorted, because its main structuring principle is the placement of national policies along a continuum from closed to open.[11] In this regard, the ethnically selective nationality policies of Eastern Europe have recently been compared to those of (other) EU countries, resulting in them being considered relatively closed (Sievers, 2009). However, from a global perspective they have to be placed closer to the center of an imagined continuum between open and closed, because in such an extended perspective the region near the "closed" pole would be populated by policies that make acquisition of nationality after birth almost impossible. This includes states that set the minimum time of residence required for naturalisation very high (for instance, between 20 and 25 years in the Arab Gulf States, see van Waas, 2014: 11) or leave naturalisation decisions at the discretion of the administration, with very low factual outcomes, as in the case of China (on the right of abode as an approximation to nationality in Hong Kong, see Leung, this issue). Other Asian countries are also close to this pole, the most so perhaps Japan (Refsing, 2003), and Taiwan (Low, 2013). More generally speaking, ethnic selectivity is a well-founded principle of immigration and nationality policies in Southeast Asia (Asis & Battistella, 2012), making naturalisation preferences for co-ethnics in Eastern Europe appear anything but extreme. Another non-European benchmark with pointedly ethnically selective nationality law is Israel (like Japan, a country very ambiguously located at the margin of "the West", and discussed more at length below). In other

[10] Among the most prominent of such works are Bauböck (1994); Bauböck et al. (2006); Bloemraad (2006); Brubaker (1992); Janoski (2010); Joppke (2010); Howard (2009); Huddleston and Niessen (2011); Dumbrava (2014).

[11] Even if such a one-dimensional model is increasingly amended to include other dimensions, as outlined above, the criterion of closedness-openness remains present in all of them.

words: most comparative models are still fragmentary, from a global perspective, and tilted towards Western Europe, USA/Canada, and Australia.

Lack of data for systematic comparisons beyond the West

Alongside the descriptive conclusion that there is a Western bias in the work on naturalisations, it also seems that there is a lack of will to look beyond the West. So far most works on nationality policy (and on naturalisations in particular) have deliberately chosen to focus on the USA, Canada, and Australia, and on the former colonial powers, France and the UK – or, more recently, on a growing number of EU member states. This is because those countries are pictured as the main destinations of international migration today (Castles & Miller, 2009: 4). Regions beyond them are rarely integrated into comparative research designs, and little has so far been published in a comprehensive and comparative way about naturalisation policies and practices throughout the world.[12]

It is obvious why so many authors dedicate time to the study of the USA, Canada, Australia, and the EU: research on nationality follows the policy-driven perspective of how to manage migration and immigrant incorporation in those countries – and hence is well funded. But numbers count in another way too: the (un-)availability of statistical data is one mayor inhibitor of systematic comparisons on a global scale. Inspired by the quest to *explain* naturalisation policies, the methodology used in index-based comparative design makes differing nationality policies comparable by reducing the particularities of the cases they study to a limited set of numerically comparative variables (for instance by counting the years of residence required, or assigning the value of 0-5 for levels of language requirements, etc.). The calculated results are later interpreted (or "measured") by placing them on a scale that ranges, for example, from open to closed, or from liberal to restrictive. After the data have been computed, the national policies to be compared can be related to each other (or "ranked") according to their degree of closure/openness.

The ongoing academic interest in large scale comparative works based on numerical indexes leads to continuously growing sample sizes and to a matrix of comparison that is continuously becoming more complex. In an article in 2013, Maarten Vink and Rainer Bauböck compared the naturalisation laws of 36 European states. For their comparative scale, they defined a set of twelve indicators which include both ordinary naturalisation, and acquisition through "special ties", for instance for co-ethnics; and they included loss of nationality inside as well as outside the territory of a state, i.e. through voluntary acquisition of another nationality, and through prolonged residence abroad (Vink & Bauböck, 2013: 626). Vink and Bauböck admit that the explanatory value of a

[12] Two exemptions are edited volumes that add to the 'usual suspects' the Baltic states, Russia, South Africa, Japan, Israel, and Mexico (Aleinikoff and Klusmeyer, 2000), and the EU enlargement states of the 2000s and Turkey (Bauböck et al., 2009) respectively.

model as complex as theirs is limited, and that they primarily demonstrate the great "empirical variety of regimes in Europe" (Vink & Bauböck, 2013: 641).

The practical problem this sort of "measuring" (Huddleston, 2013) of naturalisation policies from a large-scale comparative perspective faces is that reliable data are only available for proportionately few countries. It is already not an easy task to compare policy outputs (i.e., the regulations on paper) when each and every norm must first be translated accurately, not from the languages of the former European empires, but from Malay, Chinese, or Azerbaijani, into a lingua franca to allow comparison. But even more so it is no wonder that index-based comparisons cover states that publish statistics on the outcome of naturalisation policies (i.e., the numbers of naturalisations, naturalisation rates, rejected applications, etc.). The latter is currently not the case for most countries in Latin America, Africa, or Asia, hence those regions simply cannot be incorporated into complex comparative grids. As a consequence, it will continue to be difficult to test this descriptive modelling against cases from non-Western regions. Thus, relying primarily on quantitative data so far impedes the implementation of a truly global perspective.

The case studies and heuristic comparisons of this special issue

The argument made so far is that universal comparison is difficult to accomplish on a global scale and has not yet advanced very far, even if the comparative designs derived in and for the West are becoming ever more elaborate. Nevertheless, studies with a Western bias can provide stimulating input for research beyond "the West", though they have to be adjusted and expanded, and some arguments might be partially dropped in the process.

The contributions in this special issue study naturalisations in order to better understand the broader societal constellations they reflect. They are directed at distinctive features of singular cases they want to understand, and allow for comparison not with the aim of universalizing theory-building, but only in a heuristic sense. In-depth case studies like these have the advantage of analyzing naturalisations in their respective contexts, and therefore allow for a better understanding of particularities – which would, in turn, not be visible without comparisons with other cases and general trends.

Studies on regions beyond the West

Studies with a broader regional focus can still productively draw on theories derived from Europe. Many colonies of Western powers became independent states only in the course of the 20th century. Particularly with regard to the relatively short independent history of the post-colonial states in Africa, Asia, and the Caribbean, studies on them take into account the historical "making of" nationality law, for instance through decolonization (see the contributions in Ko, 1990). When post-colonial states became independent of Western dominance, they also gained sovereignty over the decision as to who would be considered a member of the new nation. But their legal definitions of

membership were often informed by the knowledge and the worldviews of their (former) colonial administrators. This was for instance the case when South (-East) Asian countries drafted their first post-colonial immigration legislations by copying outright norms regarding the selection and prohibition of immigrants from US, Australian, and other "Western" laws;[13] or when countries that emerged from the British empire received direct instructions from British expert commissions on how to draft their own constitutions and their new nationality laws (Hassall, 1999: 53). Christopher Lee also returns to the role of nationality law in the formation of the (British) colonial state in Africa, and concludes that his analysis of how the colonial form of *jus sanguinis* helped to maintain a distinction between the categories of "native" and "non-native" amended the "ethnic state model that has predominated conventional understandings of the state in Africa" (Lee, 2011: 521–522).

Other countries in Asia were never (formally) under European colonial dominance (like China and Thailand), but fit into a general description of Asian countries as less likely to accept immigrants as permanent members of their societies, and hence as restricting access to legal membership status. As migration of less skilled migrants is seen as merely temporary, long-term integration is not considered necessary, and family reunification and naturalisation is ruled out (Asis & Battistella, 2012: 32), while highly skilled professionals are usually sought after and their permanent residence is encouraged, including in some cases the provision of investor citizenship.[14]

Due to its location off the east coast of Africa and as part of the Indian Ocean rim, the island of Mauritius is located at a unique crossing point of different regional influences, and has seen many migration flows passing by throughout its (modern) history. Its society, today a middle-income economy, is deeply marked by the consequences of the colonial labor regime, with a white elite (formerly the plantation owners) still in control of much of the land, while the larger, poorer parts of the population are ethnically mixed, of African and Indian ancestry. Like many African countries Mauritius became independent in the 1960s, and has subsequently adopted a restrictive immigration policy, which has allowed low-skilled migrant workers to enter only temporarily, and only with a work permit tied to a particular contractor. This regime is currently partially opening, based on the "selling" of residency/citizenship to rich foreigners who invest in the country. As Ramtohul's study shows (this issue), in line with similar schemes in other parts of the world, this commodification of nationality is solely directed at attracting money, not people. Accordingly, the integration of such individuals was no issue when the immigration and naturalisation laws were amended in the 2000s to allow citizenship to be sold,

[13] As examples see "the postcolonial immigration acts of Malaysia, Singapore, Fiji, Brunei, Papua New Guinea, and more" (Bashford, 2014: 40).

[14] Such a two-tiered system with significantly differing rights accessible to the two different groups is practiced in India, Bangladesh, Thailand, Malaysia, Singapore, Indonesia, the Philippines, and other countries (Asis and Battistella, 2012: 38).

and the problematic social impacts of such schemes became visible only later. Certainly, naturalisation in Mauritius is not seen as the final step of a process of integration, nor is it considered important to encourage the naturalized new citizens to become equal members of society. On the contrary, the rich investors are perceived (and maybe erroneously so) as a mobile transnational elite, without social ties to Mauritius and with no interests in political (or other) rights that come with Mauritian nationality.

Singapore is an example of a state that not only enables immigrant incorporation by a selective naturalisation policy, mentioned above as typical for many Asian states, but also outright forces the desired immigrants to stay and become legally equal citizens. During its fifty years of independence, the city-state relied on selective import of immigrant labor in line with its meritocratic vision of society, and thereby managed successfully to strengthen its economic capacity. The relevant policies were selective, normatively excluding less-skilled immigrant laborers from permanent incorporation and offering highly skilled immigrants an exclusive access to nationality and full citizenship rights. Up until today, the granting of nationality to desired immigrants is not only a means to meet economic objectives, but can also be interpreted as an ongoing process of symbolic nation-building. Soon/Mathews (this issue) show how the state's effort to anchor foreign talents to the nation by granting them Singaporean nationality is in turn canonizing supposedly key national values, like multiculturalism and individual entrepreneurship. They are communicated to new citizens during the recently created *Singapore Citizenship Journey*, the core element of the naturalisation procedure, and in turn foster a specific understanding of what Singaporeanness means.

In Hong Kong, a selectively two-layer regime, very similar to the policy in Singapore, is in place. "Foreign talents" are desired immigrants, while less-skilled and less-educated workers are rejected, to the extent that even family reunion is not provided for. But in addition to a very short period of independence from British colonialism, Hong Kong shows another particularity: its incomplete sovereignty due to the influence of China. Hong Kong was designed by the colonial state, and is still envisioned by the political elites as a mere "economic machine", not a society, a community of people with social rights (see Leung, this issue). This brings with it the neoliberal logic of an optimal composition of immigrant population, and the potential for the city to grow through foreign talents. As an example, foreign domestic workers are excluded by law from the right of abode, and hence from other rights of permanent residents – including the right to work without being tied to a particular employer, the right to vote, and the right to reunite with family members from abroad. In this way, a large segment of less-skilled, poorly educated, and overwhelmingly female foreign immigrant population is deprived of even long-term legal incorporation into Hong Kong society.

As has been mentioned above, some of the naturalisation policies discussed in this special issue are even more restrictive, most strikingly the exclusive

norms in Israel and Liberia, where naturalisation is only possible for those belonging to a racially or religiously defined group. In Israel the Jewish religion is seen as the basis of the state, and this conception is consequentially carried forward into the norms of nationality. The Law of Return considers every Jew a member of the Jewish "people", which predates the State of Israel. This results in both the unusual conception of complete equality between domestic-born and immigrant Jews, even before naturalisation of the latter, which "reverses the common hierarchy between a native citizen and a new immigrant" (Shachar, 2000: 396), and also in an even more pronounced difference between Jewish and non-Jewish immigrants to Israel. Kranz (this issue) is not concerned with immigrant Jews "returning" to Israel, but instead looks at the normative treatment of *non*-Jewish immigrant partners/spouses of Jewish Israeli citizens. They can only obtain a residency permit at the full discretion of the Ministry of the Interior, and this permit furthermore remains dependent on their continued partnership with the Israeli citizen. By taking into account the status of children born to non-Jewish foreign mothers, and Jewish Israeli fathers, the lack of civil marriage, and the normative value of family unity and parenthood, Kranz evaluates the particularly tight provisions on permanent residency and naturalisation accessible to spouses and non-married partners of Jewish Israelis, and thus analyzes the self-understanding of the Israeli state (and probably nation, too) as Jewish.

Another state based on explicit ethnic exclusivity is Liberia. Its nationality law defines only those of "negro descent" as eligible for Liberian nationality, with the effect of ensuring enduring exclusion from the citizenry for large, and in no way marginal, parts of the immigrant population. This is outlined by Ludwig (this issue) with reference to the descendants of immigrants from Lebanon. Their parents arrived in Liberia from the late 19th century onwards, and as they were (and still are) classified as non-black, they cannot naturalize to become Liberian nationals. Even though born inside the country, their everyday rights are severely curtailed because their status as foreigners prevents them from buying land, among other restrictions. Ludwig concludes that not only was Liberia's national identity modeled around the freed African American slaves who founded the country in the mid-19th century, but that the racialized concept of African ancestry continues to plays a pivotal role in today's hegemonic understanding of who the Liberian state and society should include.

Mexico is included in this special issue as an example from the Americas, a region known for its long republican history (starting in late 18th or early 19th century), and its inclusive *jus soli* regime (i.e., membership of immigrants relies on territory, not ancestry). In Mexican nationality law, however, the border drawn symbolically between full-fledged insiders and the less privileged is located within the citizenry, as Hoyo (this issue) shows. He points to the many legal restrictions naturalized Mexicans have to face, including being barred from many governmental positions and "security-sensitive" occupations, such as becoming the crew member of a merchant vessel. Hoyo concludes that in order

to understand why in Mexico the naturalized are not seen as "authentic Mexicans". His study must be both historiographic and take into account the specific context. The "Mexicans only" doctrine in many fields of domestic policy, and most of all where nationality is concerned, he sees as being related to the deeply entrenched ideology of Revolutionary Nationalism, installed by the ruling party PRI, which became almost interchangeable with the Mexican state in the course of its 70-year rule. The strict defense against any "foreign intervention" that the PRI called for was obviously directed against their overpowering neighbor, the USA. When taken into account, these two aspects – the unequal relations between Mexico and the USA, and the former's Revolutionary Nationalism – go a long way toward explaining much of the "protective" nationality policy in Mexico up to the present day.

The compilation of studies in this special issue constitutes an exemplary extension of existing publications on this matter, because it includes selective nationality regimes in new(er) countries of immigration, ranging from the "two-tier system" in Hong Kong and Singapore to "citizenship for sale" in Mauritius; the collection also includes "liberal classics" like Mexico, as well as cases of ethnic/racial/religious exclusivity like Liberia and Israel. The cases investigated in this special issue thus enable heuristic comparisons among them. To reach a genuinely global perspective means not to treat the Global South separately from global entanglements by confining ones interest to "authentic Southern" perspectives only – much less to "*the*" Southern perspective – as this would lead to an additional segregation, similar in consequence to the classic area-studies approach, and would bring with it the "danger of introducing gross generalisations and reinforcing stereotypes" (as remarked by Bakewell and Jónsson with regard to the study of "African migration", Bakewell & Jónsson, 2013: 478). But it is also necessary to let a wider variety of cases speak for themselves, and not to study them as mere deviations from a "global norm" (which is, in fact, if anything a *Northern* norm). This might produce fruitful discussions and possibly new theoretical insights from a genuinely global perspective.

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