

## CITIZENSHIP AND THE TRANSATLANTIC DIVIDE\*

BY GIOVANNI MORO

This article, which summarizes the principal contents of the program for dialogue between Americans and Europeans promoted by FONDACA (Active Citizenship Foundation), follows a simple idea. The confrontation, usually called “Transatlantic Divide”, exists and it has a real dimension, beyond the present contingencies. This critical split can be wisely managed through dialogue and a serious debate. Nevertheless, in order to allow the dialogue to reach the real roots of the differences, it is necessary to avoid discussion about usual subjects, as international security, world trade, and the role of the United Nations, since the attitudes towards these themes have their real bases in deeper cultural patterns and shared visions. The analysis of the idea and concept of citizenship can be a good way to understand the reality underneath the present international debate and its conceptual core. This topic is not really debated among the public opinion and there is a big deal of disinformation about it, even though it could be used as a prism through which it is possible to grasp many different characterizing elements as individual identity factors, social links, the role of the government, and so on. The analysis of the concept of citizenship implies the identification of the basic differences, but, at the same time, those common challenges which definitely need more collaboration than confrontation.

\*\*\*\*\*

One of the main features of the so-called Transatlantic Divide is that it is one of the most debated topics but, at the same time, one of those subjects that it has not been put under strict analysis during the last years. The very impression that an observer has about this debate is that it is extrinsic and superficial. Furthermore, it has been often polluted by propaganda exigencies and focused on internal political issues. Another important attribute of the current discussion is the massive use of stereotypes and rhetorical expedients, disguised as statements of principles and bent to superior political priorities (e.g. “we cannot be nothing but allies”). Moreover, the debate seems to be the privileged forum for superiority and inferiority complexes.

Nevertheless, the divide – conceptualized as growing misunderstanding, which leads to latent and manifested situations of conflict between Europe and United States – monopolizes the public and international debates. It is possible, therefore, to point out some important features of the

---

\*Published in *Democrazia e diritto*, n. 2/2004, pp. 125-134.

Giovanni Moro is president of FONDACA (Active Citizenship Foundation).

Transatlantic Divide from which to start in order to go further in depth in the conceptualization of this important issue.

Firstly, we have to fully realize that the differences, which represent the main subject of this article, were not born during the rise to power in the United States of the presidency of G.W. Bush and of a group of fellows (the neo-conservatives), who brought to the White House really odd ideologies. In fact, this phenomenon and the reasons of the confrontation between the two side of the Atlantic Ocean, are widespread into the whole American ruling class.

Secondly, we have to highlight the fact that Europeans, despite their differences, show divergent feelings, ideas, attitudes and interests with respect to Americans. The fact that some European governments have decided to be allied with the United States in the war on terror does not represent a contradiction, since in those states the ruling class has to face a real and deep public discontent, as the Spanish election of March 2004 demonstrated.

Thirdly, the Transatlantic Divide is not a post-9/11 phenomenon, since it has been previously present in the transatlantic relationship. The international debate and confrontation between Europeans and Americans on the global policy on human rights, and in particular on the institution of the International Criminal Court can be taken as a good example and as a symptom of the pre-existent differences between Washington and the European countries. The issues regarding world trade, the role of the United Nations and the environmental policy could also be used as useful illustrations of the persistent differences.

Fourthly, we have to realize that, even though cultural, political and economical differences between Europe and USA had always been present, in different degrees and intensity, since the end of the Second World War, those divergences mutated in a real divide after 1989, and the end of the communist regimes in eastern Europe. This transformation was probably due to the end of the Cold War and the simultaneous end of the need of unity among the western countries against the communist threat.

Fifthly, we have to consider the fact that beyond the appearances made by stereotypes, propaganda speeches, ideological debates and arguments, there are real cultural differences that represent the core of the Transatlantic Divide. Those discrepancies have a cognitive aspect, related to the representation of the reality, and an operational side, related to differences of interests, resources,

power, etc. Those two aspects overlap and interact to create a real difficult and intricate situation, which will be really hard to solve.

\*\*\*\*\*

Now that these simple premises have been pointed out, it could be possible to begin to understand the problem of how to face in a serious and creative way the differences between the two sides of the ocean, not necessarily to solve them once and for all, but to manage them with consciousness in order to search out the best elements and, at least, to avoid more serious problems. A rather easy starting point could be to increase the knowledge not only about the Transatlantic Divide, but also on the fundamental factors that lie at the very core of the issue. We have to fill the gaps in information and knowledge that generate and augment the confrontation. And in order to succeed we have to go down to the roots of the differences rather than stop our enquire at a superficial level.

Following this idea, FONDACA (an institution recently created in order to promote research, formative and cultural activities, following the experience of the Italian movement Cittadinanzattiva) has promoted, during the year 2003, a program aimed at the increasing of knowledge and information exchange between Europe and United States that has been focused on the issue of citizenship. Conferences and workshops on the American experience had been organized in Rome, while other meeting had been held in Washington and New York. These meetings had been attended by researchers, people involved in politics, in public administration, in civic initiatives, in business and in the information environment<sup>1</sup>. The program will continue through different initiatives during the years 2004 and 2005, and it will be aimed at filling the present and reciprocal knowledge gap about the subject as well as at the identification of the differences, similarities and common challenges. In this article some of the results of the already performed parts of our program will be showed, while the more recent developments could be followed on the website [www.fondaca.org](http://www.fondaca.org).

\*\*\*\*\*

Although the choice to start from the idea of citizenship to fill the gaps in the understanding and knowledge between Europe and USA could be considered as peculiar, the reasons for such a choice will be clearer when we will start to analyze in more depth the concept of citizenship.

---

<sup>1</sup> Among the main speakers were: Morris Fiorina, Stanford University (CA), Victor Pérez-Díaz, Complutense University (Madrid), Ulrich Preuss, Free University (Berlin), The events have been organized in close relationship with the following academic institutions: Centre for Transatlantic Relations, John Hopkins University (Baltimore), Centre for the Study of Europe, Columbia University (NY), Department of Political Studies, Catholic University (Washington).

When we talk about citizenship we intend a principle by which an individual human being belongs to a specific society that works at different levels and that is composed by different dimensions: a system of rights and duties that persons have to pretend and fulfill before the state, a structure of individual powers and responsibilities in the public life, a whole of values and rules on which reciprocity and interdependence are based, a social status that, at the same time, can include or exclude an individual from the society to which he/she belongs. Following this school of thought, citizenship has something to do with the personal and social identities, but it is strictly related with the institutional and public functions that lie at the core of any advanced society and it is linked to the dynamics between institutions and society.

The citizenship's multi-faced nature, that involves individuals and community, social and institutional environments, cannot be underestimated. In fact, this characteristic could work as a prism, and can produce a split and a modification of the reality's representation, offering, meanwhile, more analytical visions and perspectives. In other words, since the idea of citizenship could be heuristically relevant in the field of the relationship between Europe and United States, it is definitely worth a deeper analysis.

In this sense, the idea and phenomenon of citizenship furnishes the observer with an unique viewpoint from which look at differences, analogies and common European and American challenges. Concretely, we have to underline, once more, that there is a great deal of disinformation about citizenship and the related subjects on both the Atlantic's shores. For example, it is a quite widespread opinion in Europe that the United States do not have any system of welfare at all, while the American public opinion believes that something like European citizenship does not exist. Furthermore, since the very concept of citizenship, in the contemporary world, lays at the heart of deep tensions and mutations, the identification of common challenges could have a real empirical importance.

\*\*\*\*

Moreover, we have to add at the previous epistemological premises an important methodological note. The comparison of the "two citizenships" can be properly done only if we are aware of the deep differences between the two compared phenomena and the degree of arbitrariness involved in

such an operation. Some examples will be useful in order to better understand the differences between the European and American models of citizenship.

The American concept and experience of citizenship has an undoubted central role in the history of the United States and it is really well defined in terms of its fundamental characteristics. At the same time, it reflects the lack of a long common tradition and the need to respond to the exigency to deal with the present and future challenges. Moreover, it evolved in an environment characterized by the lack of pre-existent institutional structures and, therefore, it evolved on a parallel path with the institution building process. Furthermore, in the opinion of some scholars, the American idea of citizenship was born well before the American state, as seems implicit in Tocqueville's reflections on the American tendencies to build up associations to face common problems and preserve shared interests.

From this stand point, American citizenship appears to be based on a relevant social patrimony that has allowed the inclusion into the social life of several ethnic, religious, and linguistic groups. The evolution of the American citizenship had deeply influenced the development of the representative institutions and of the public life. The current debate on the crisis of the civic feelings in the United States, stimulated by a series of articles by Robert Putman and summarized in the book "*Bowling Alone*", refers to a long term phenomenon, which has real deep roots.

The European citizenship, on the other hand, has been established just in 1993, through the Maastricht treaty. It is not linked to any national state or standard representative democracy. Furthermore, it is neither based on any well defined social nor on a cultural identity, nor on a common language, and not even on a shared history. Therefore, we are before a "non standard" reality.

Although very young, the European citizenship has been criticized by different and opposing points of view. From a "federal" stand point, it has such a poor content that it cannot have any concrete meaning for the Europeans. On the contrary, from a "confederate" point of view, the European citizenship represent a menace to the national states. In some critics' opinions, since there is not an European civil society, an European citizenship cannot exist. Other critics think that, given the fact that citizenship can exists only if related to a nation-state, "nobody could belong to a treaty" (in the words of a British MP during the European Convention's debate). Nevertheless, in the last ten years, a bill of European rights has enriched the European citizenship's meaning; a new currency

has been introduced in the majority of the European countries; policies to safeguard the European citizens had been implemented in the field of customers' protection, of social cohesion, education, environment; the European Union has been enlarged through the accession of ten new states; a new European constitution, that will only enhance European citizenship before the nation-state ones, has been approved. Moreover, some proposals have been put forward in order to allow third country citizens long-term resident in the European territory to get the European citizenship. The work of the civic organizations all over Europe, and the growing links between them, are slowly but constantly creating an European civil society.

Therefore, because of its anomalies, the European citizenship could be considered an experimental lab for the contemporary democracies. The main issue at stake is represented by the creation *ex novo* of a supranational citizenship, a principle of belonging and a set of rights and duties that do not derive from any other national state.

In order to allow a proper comparison between the European and American concept of citizenship, we have to take into consideration the European tradition on citizenship and use it as background for a better understanding of the European citizenship as such. This tradition, notwithstanding the differences characterizing the different national approaches, is, nevertheless, similar enough to be treated as an unique phenomenon.

\*\*\*\*\*

During the meetings organized during the year 2003 by FONDACA, several issues emerged and different topics were discussed at length. All the discussions, put together, could almost be considered as an index of the differences between the American and European perceptions of citizenship. From this first inventory, new elements came out, which could be used as a second list of the common challenges the two sides of the Atlantic will have to face in the future.

In the following pages we will illustrate these two inventories, ending with some considerations about the role that can be played by civic associations in order to fill the transatlantic divide.

The differences' list is articulated in six points.

The first point regards the basis of citizenship as such and the factors that determine its acknowledgment and acquisition. In the European case the two main factors determining someone's national belonging (even though in different degrees depending on the nation we are taking into consideration) are *land* and *blood*: that is, the place where someone was born and his/her parents' nationality. That means that in the European tradition we can acquire a citizenship either because of our place of birth or because some of our relatives come from that particular country. Although there is a good deal of debate about the so called *ius domicilii*, that does not mean that the basic elements of the concept of citizenship have been changed. On the other hand, the American idea of citizenship is clearly based on shared values and beliefs, and this feature is even more understandable, given the fact that the real strength of the American society lies on its multiplicity of ethnics and cultural groups. The different American and European experience is clearly visible, for example, in the US immigration policy: even after the 9/11 and, notwithstanding the several restrictions put on the number of accesses in the country, the US government concede its citizenship to almost one million people per year, a larger amount than the total figure of the whole countries belonging to the European Union.

A second difference to be underlined is the relation between citizen and government. In the European tradition the state has a dominant role in the relationship and, in certain ways, it precedes the citizens. On the other hand, in the American tradition the state has a definitely weaker and reduced role to play, regardless of conservative or liberal vision of the public life. The European citizens face a strong government, that tend to a monopolistic management of the public life, while American citizens have to deal with a weaker state that does not pretend, and has not the means, to implement every governance function. An index of this basic difference could be represented by the different use of the word "public" on the two sides of the Atlantic ocean. In the European context, such a word means what belongs to the state, while, in the American tradition, it defines what actually belongs to the community. We could discuss about the real meaning of the concept of community, but it doubtless does not mean the state. Furthermore, it is quite interesting to notice that the term "subsidiarity", which is so increasingly used in Europe in the present political debate and in concrete policy programs, it is difficult to understand on the other side of the Ocean.

Related to the latter difference there is a third point of discrepancy between the American and European experiences, namely the identification of the supreme community's interest to which every citizen has to give its contribution. In the European tradition the supreme good is represented by the general interest. The latter concept is put in practice through the mechanism of representation

that works thanks to the vote of the citizenry, and it does not necessarily coincide with everyone's or even someone's interests. In the American tradition, on the other side, the supreme good is identified in terms of common interest, while the idea of general interest is really difficult to understand. The common interest is clearly something less abstract than the general interest. In simpler terms, the common interest refers to the practical concerns of a community or to those expressed by its majority. Moreover, it is useless, in this context, to get into the controversy about the dangers of a "majority's dictatorship", which are implicit in such kind of vision that put the common interest at the center of the mechanism, as it is ineffectual to enter into the debate regarding the threats of oligarchy, implied in scheme that has its pivotal element in the idea of general interest. At the present stage it is sufficient to underline the differences between a concept of citizenship (and democracy) devoted to the idea of general interest and that committed to common interests.

A fourth difference has to do with one of the most important operative forms that citizenship takes, namely the idea of social citizenship, especially referred to the welfare policies. There is a fundamental misunderstanding about the theoretical interpretation as well as the operational patterns of this element. On one hand, from the American point of view, the European welfare state is considered as highly bureaucratic and based on mere assistance; furthermore, it seems, from the US perspective, that such a mechanism tends to mortify the individual values and to award parasitical behaviors, trying to guarantee a high or full degree of social protection. On the other hand, from an European stand point, it appears that the US welfare state simply does not exist. The main point, though, is that while the European scheme is based on the state, the American one has, as its backbone, the community, and its ability to gather private and social resources in order to guarantee assistance for the most disadvantaged people. It is clear that such a divergence produces deeply different situations in terms of access to services, and that the European reluctance to change its welfare model is definitely reasonable, despite the well-known problems of European welfare systems. Nevertheless, as it will be seen afterwards, it could happen that opposite starting points could lead to a convergence on the nature of the main problems to be faced.

The fifth element is represented by the issue of the rights, which is strictly connected to the previous point. The main difference between Europe and USA on this subject is that, while the former focuses on social rights, the latter aims its attention at individual rights. This is one of the most known differences between the American and European contexts, and it has relevant consequences on the operative side of the systems. For example, following the opinions of some scholars, this



discrepancy is one of the main reasons why there is such a divide between the two sides of the Atlantic regarding human rights' issues, especially on the problem of co-operation between rich and poor countries. It might be useful, furthermore, to add that, for certain observers, the emphasis put on rights and individual responsibility represents the fundamental concept on which lies the very foundation of the cultural pattern "to give back to the community" the benefits he/she had had, which might represent the origin of the concept and practice of the corporate social responsibility US.

The last element to take into consideration in terms of differences is the relationship between citizenship and political dimension. At this point we are not talking about the obvious linkage between citizenship's practice and formation of the representative institutions (were there are no relevant differences), but we are referring to another aspect, that may be considered of a lower rank, in institutional terms, but that has a primary role to play from a practical point of view. We are referring to the connection between civic and political dimension. In this context, the term civic dimension means the daily commitment of a single citizen in the public life through volunteerism, good neighborhood, advocacy activities and so on. On the other hand, the term political dimension means the process of public mobilization that leads to the choice, through political parties and elections, of the representatives that will give political directions for the management of the public life. Here is the difference: in the United States there is a traditional continuity between these two aspects of the public life that makes normal practice for a civic association, in electoral periods, to line up or sustain a certain candidate, or to express one on its own. In Europe, on the other hand, there is not such a link, if not because of the political traditions, surely because of the consolidated practice. It almost seems that in the European context there is not continuity between civic and political dimension. In other words the civic and political dimensions appear to be completely independent and not linked together. One can criticize this idea, stating that the two dimensions are actually interdependent; but it is a matter of fact that the European approach stresses rather their discontinuity.

The six differences just listed above – the principles, the relationship between citizens and state, the identification of the supreme interest, the welfare system, the link between citizenship and political dimension – are just some examples of the discrepancy between the two concepts and experiences of citizenship. Although the catalogue is not complete, those are the different features that emerged during the debate organized by the Active Citizenship Foundation during the year 2003. Therefore, they can be used as a spring board from which to start a sort of "inventory of differences".

\*\*\*\*

A second kind of inventory that emerged by the debate is one that enlists the common challenges. Although starting from two opposite positions, both citizenships have to face common problems that need co-operation in order to get solved.

Seven issues had been identified as extremely important.

The first problem to be faced is the management of the welfare, especially in an environment where the growing demands in terms of quality and quantity of the services have to cope with the decreasing availability of resources, whether public or private.

The second issue is represented by the double phenomenon of globalization and localization, which jeopardizes the chances for the states to improve the social and political integration, which is supposed to be the typical outcome of citizenship.

The third challenge is the organization of the immigration fluxes, that are every day bigger and less manageable through the traditional means of “naturalization” but, nevertheless, unstoppable. This phenomenon needs a new definition of the contents and modes of citizenship’s acquisition, even in the context of the global war on terror.

The fourth issue that should be dealt with is the progressive disappearance of the traditional places for citizens’ socialization, as the military service, the schools and team sports. In fact, there is a gradual but progressive loss of those social environments where the values can not only be strengthened and transmitted, but also where the social fabric can be produced and re-produced and where the interaction and the values’ sharing can produce a positive sum’s game.

The fifth problem to be dealt with is the lowering of the political and electoral participation and the growing distrust in the ruling classes. For many years the American situation has been seen as an anomaly because in that system a minority actually elects the President of the United States, while the European systems have been indicated as a virtuous example. Nevertheless, during the last decades the two systems tended to converge on a lower electoral participation and on the clear lack of trust in the governments that, in this way, start to experience a power deficit.

The sixth big issue arises mainly from the transformation of the life styles in the contemporary societies. The mutations that involved the availability and use of the time, the changing working and life conditions, and, furthermore, the role of the women, have a direct effect in the participation of the citizens in the public life.

Seventh and last challenge to be faced is represented by the amazing development of the media and information technologies. These changes represent both a risk and an opportunity. The risks can be identified, for example, in the increasing passive attitudes towards the social life due to the overdose of entertainment. Internet, on the other side, represents an opportunity for new form of social activities, for the development of political actions and for a more practical democratic dimension.

\*\*\*\*

To conclude, it is right to devolve a good deal of attention to citizens' activities in the public sphere through volunteering and advocacy, because of its practical relevance. Furthermore, there is no doubt that those organizations have a growing role in the formation and practice of public policy at national and global level, inasmuch to be considered as real actors in the governance as the public and private ones.

Looking both at the European and American experiences we can identify positive and negative phenomena.

From a positive perspective these organizations have the ability to partially fill the gap between society and institutions, enhancing, therefore, the powers of the citizen in the daily public life and, at the same time, addressing the crisis of governance through the mobilization of resources, the production of social trust and the care for common goods.

From a negative prospective, on the other hand, these organizations, both in the United States and in Europe, show a growing tendency to professionalism to the detriment of the participation of the common citizens. Other risks can be identified in the sliding of their operative activities form a political to a legal dimension. The overrepresentation both of extremist sides, quite far away from

the common public feelings, and of upper classes' interests and points of view, is another menace to be taken in high consideration.

Nevertheless, in order to start to work on the transatlantic divide it is necessary to understand the role of the civic activism, that could have a crucial importance. The citizens' associations seem to be the closest contact point between America and Europe because of their common ends, approaches and experiences. Furthermore, they present a relevant attitude to work together on a global scale, notwithstanding the present cultural homogenization and standardization. Last, but not least, the citizens' associations, this is probably the main point, are the privileged fora where the redefinition and reform of the concept and practice of citizenship are in progress and where efforts are spent in order to learn how to manage the new and different issues that are arising on both shores of the Atlantic Ocean.

Rome, July 2004