Locating European Citizenship

Giovanni Moro

ABSTRACT

This paper is not devoted to European citizenship, but rather to the ways we study it. The paper is based on a sample of recent literature on EU citizenship and is developed as follows. Firstly, seven divergent thematizations (the ways EU citizenship is identified and framed) are introduced and analyzed with regard to the problems they show. Then five conceptualizations are presented that come from the same sources, and that should be considered to overcome criticalities. There follows the introduction of a conceptual framework regarding democratic citizenship as an empirical phenomenon. This framework allows the identification of a paradigm that has shaped national citizenship and that is experiencing deep crisis and transformation. European citizenship, from this perspective, can be viewed as anomaly of the paradigm and then appropriately studied.

KEYWORDS: Citizenship; European citizenship; European Union.

Locating European Citizenship

Giovanni Moro

PROFILO AUTORE

Giovanni Moro è un sociologo politico. È professore associato al Dipartimento di Scienze politiche della Università Sapienza e responsabile scientifico di FON-DACA, una fondazione di ricerca con sede a Roma. Si occupa di fenomeni connessi alla cittadinanza e ai suoi mutamenti, di politiche pubbliche, di analisi concettuale e terminologica nella scienza e nel discorso pubblico, di nuove forme di governance e di dinamiche delle organizzazioni a impatto sociale. Ha dedicato particolare attenzione alla cittadinanza attiva e alla cittadinanza europea. Tra i suoi libri: *Azione civica* (2005), *Anni Settanta* (2007), *Cittadini in Europa* (2009), *La moneta della discordia* (2011), come curatore *The Single Currency and European Citizenship: Unveiling the Other Side of the Coin* (2012), *Cittadinanza attiva e qualità della democrazia* (2013), *Contro il non profit* (2014), *Cittadinanza* (2020).

Email: giovanni.moro@uniroma1.it

I. INTRODUCTION

Dealing with European citizenship during the Covid-19 emergency could be considered ill-timed. However, we cannot presume that this worldwide event will not have a relevant impact on Community citizenship as well.

Certainly, it is not the first time that critical situations have brought into question citizenship of the EU. Community enlargement, the establishment and implementation of the Schengen area, the introduction of the single currency and, more recently, the economic and financial crisis of 2008, the rise of Euroscepticism and populism, the UK referendum on Brexit, the refugee crisis, are all examples of events, processes and situations that have contributed to shape the EU citizenship regime (see, for example, Mindus 2017; Kostakopoulou 2018; Gerhards, Lengfeld 2015; Shaw 2019; Bellamy, Staiger 2011). It is therefore likely that the Covid-19 emergency will also have a similar impact on citizenship of the European Union, at least because of the step forward that EU institutions and member states have made on this occasion.

It is not only a matter of institutional arrangements or Community policies, however. The "citizens' side" of the European Union remains the main stumbling-block of the Community project. The effects of the 2008 crisis management and the rise of sovereignism are clear examples of this. For this reason it is worth reflecting upon European citizenship today.

The field of research on EU citizenship is broad, as well as the amount of pertinent literature. In a sense, it is consistent with the flourishing of research and attention dedicated to democratic citizenship in general, started at the beginning of the 1990s (Moro 2020, 31-32). In another sense, it reflects the very nature of EU citizenship: an experiment within the larger Community experiment (Shaw 2019, 2).

This experiment has a long-term history, starting well before the formal establishment of the Maastricht Treaty, in 1993. Recent studies have appropriately backdated Community citizenship, which emerges as being associated with the European project from its starting point, receiving impetus from the two main pillars of the EU, freedom of movement and non-discrimination (see Mindus 2017, 7 ff.; Margiotta 2014, 30-64; Jenson 2007, 66 ff.; Wiesner 2014, 145-164; Pukallus 2016; Shaw 2019, 3; Karolewski 2010, 107 ff.; Wiesner 2019, 145 ff.).

In comparison with the content and extension of EU citizenship studies, this paper is very limited in its scope and purpose. The aim is to deal with the problem of locating European citizenship, both in the framework of the EU, and in citizenship-related general phenomena. This task is accomplished through an exercise of conceptual analysis, regarding mainly thematizations, not theories or general approaches to the issue. The purpose is to identify

how European citizenship is framed, then to analyze strengths and weaknesses of these frames, and to advance some hypotheses regarding a possible further conceptualization that is able to overcome the uncertainty and confusion that surrounds this issue.

In other words, my purpose is purely methodological, trying to answer questions such as: *How can we properly conceptualize European citizenship? Where can it be located in the wider context of democratic citizenship? And how can we observe it as an empirical phenomenon?* Put simply, the paper is not on European citizenship, but on how we study and appraise it.

The paper is developed as follows. Firstly, seven divergent thematizations of EU citizenship are introduced and analyzed with regard to the problems they show. Then five conceptualizations are presented that come from the same sources, and that should be considered to overcome criticalities. There follows the introduction of a conceptual framework regarding democratic citizenship as an empirical phenomenon. This framework allows the identification of a paradigm that has shaped national citizenship and that is experiencing a deep crisis and transformation. European citizenship, from this perspective, can be viewed as an anomaly of the paradigm and then appropriately studied.

II. Swinging thematizations

Reviewing the scientific production on European citizenship, I focused on thematizations, that is, on the ways citizenship of the EU is framed. The well-known concept of framing in this case is useful in accounting for the way EU citizenship is identified and located in the context of the dynamics that give shape to the European Union building process, involving citizenship as a relevant factor.

Therefore, I did not take into consideration other relevant aspects of the EU citizenship discourse. In particular, I did not seek definitions of the concept, nor the topics dealt with and discussed. Moreover, I did not discuss the several theories associated with European citizenship. The paper is an attempt to shed light on the way in which citizenship is placed in the EU context, which, in turn, has a deep impact on the way we analyze and assess its content, functioning and destiny.

Within these purposes and limits, I gathered and analyzed a sample of scientific literature, produced mostly in the last decade, specifically devoted to European citizenship (books, articles, papers or relevant chapters where headings or subheadings included "European citizenship" or similar terms). As a first step of a possible wider research program, I have identified some

couples of thematizations that, at first sight, appear to be mutually dystonic, if not contradictory.

Before synthetically introducing the seven pairs of "swinging" thematizations I have selected, it must be pointed out that references to texts do not mean that their authors necessarily support one of them, but that, in the least, they have reported and discussed them, even when they disagree. The couples of thematizations will appear very close to each other. But each of them highlights different facets of the issue under discussion.

From this analysis, seven thematizations can be identified. They can be synthetically identified as follows.

– Non-compliant or new
European citizenship is often considered non-compliant to the standards that define citizenship in general as membership of a nation-state (Tambakaki 2011, 569), or a social and democratic state (Menéndez, Olsen 2020, 6 ff.). Various more specific elements support this thematization: for example, the lack of a sense of EU identity and belonging, so that Europeans cannot be considered as a demos (at most a constellation of *demoi*); the detachment of who is governed from who governs, so that the EU governance system is not fully democratic, privileging vested interests over general ones; the scant involvement and participation of the citizenry in European politics, in particular the low level of turnout, so that canonical mechanisms of representation and accountability cannot work (Bellamy 2008a, 602 ff.). The lack of duties as well is a non-compliance factor of EU citizenship (Baubock 2019, 181 ff.). Claudia Wiesner has summarized this kind of thematization: "EU Citizenship Is a Derived, Sectoral, Multilevel, Passive, Legal Citizenship Without Duties" (2019, 218).

On the other side, European citizenship is viewed as a new kind of citizenship, regarded as a concept in the making (Tambakaki 2011, 569); a new, transnational, concept (van Eijken 2015, 5 ff.); a status *sui generis*, not constituted in the same way as national or dual citizenship (Mindus 2017, 7) and based on residence (*ius domicilii*) rather than on nationality (Margiotta 2014, XII); a work in progress (Kostakopoulou 2011); a postmodern entity based on hybrid identity, including a plurality of citizenship models (Ivic 2016, 129 ff.) and connecting unity and diversity (Tambakaki 2011, 573); bringing a logic of equalization completely different from that of national citizenship (Kostakopolou 2018, 4). In other words, EU citizenship cannot be compared to the standard model, since its *raison d'etre* is precisely to go beyond the traditional definitions (Isin, Saward 2013b, 7).

– Based on, or opposite of, national citizenship
EU citizenship is interpreted, as a political object and irrespective of its legal definitions, as an institution that is intrinsically dependent on national citizenship. That is, it takes essential elements from national citizenships of the EU member countries: for example, the sense of attachment or of solidarity between people, the effectiveness of rights, the participative dimension. The matter is that the EU lacks some basic social conditions to develop an autonomous citizenship. Without these conditions, which characterize national political communities, EU citizenship could not work, nor exist (Bellamy 2008a, 598 ff.). As a reinforcing element there is, of course, the fact that national citizenship is a gateway to EU citizenship, thus Community citizenship is inevitably linked to national ones (Shaw 2019, 1) and that services and goods that qualify citizenship are provided at national level, as well as the link between rights and obligations, especially on the fiscal side (Bellamy 2011, 2-5).

Other thematizations highlight that the value conferred to European citizenship rests precisely on its detachment from national citizenship, since the former is devoted to going beyond the content and scope of the latter. In this sense, European citizenship is regarded as a rival or successor of national citizenship (Bellamy 2008a, 597), conceived to transcend national forms of belonging (Menéndez, Olsen 2020, 7) and able to show the intrinsic weakness of the citizenship-nationality equation (Margiotta 2014, 3 ff.).

– Side effect or determining factor of the EU construction
Community citizenship is often defined as a side effect, or a dependent variable, of the EU institutional arrangement: either because it derives from political decisions, or because it is a logical consequence of the normative system of the EU (Kostakopoulu 2018, 4), especially of its two main pillars, that is, freedom of movement and non-discrimination (Shaw 2019, 3).

On the other side, citizenship of the Union is affirmed as the main reason for the establishment of the Union as a democratic regime, overcoming the market logic of the foundation. In particular, it is maintained that the ECJ case law on Community citizenship has produced constitutional effects on the EU (van Eijken 2015, 3 ff.), that citizenship of the Union has been an activator of EU legislation (Kochenov 2011, 11), that it is citizenship that makes it possible to compensate the original market-driven European community (Moccia 2018, 38). Citizens themselves, organized as civil society, are the main legitimizing factor of the EU (Pukallus 2016, 1 ff.). And European construction cannot take place merely thanks to systemic integration; it also requires the consent of citizens (Gerhard, Langfeld 2015, 7).

– Rights only or way of being
It is widely maintained that citizenship of the European Union is just as a set of rights, established in the Treaties or coming from the intervention of the European Court of Justice. EU citizenship does not derive from a link between a political community and an institutional authority; but rather from the recognition of a legal status of individuals (Shaw 2019, 3), and consists of a set of token rights linked to the single market (Tambakaki 2011, 568). Thus, citizenship of the European Union is characterized by the dissociation of rights from the belonging to a given community (Bellamy 2008a, 597 ff.).
On the contrary, it is pointed out that legal regulation cannot work if there is no legitimacy belief on the part of the citizen, and therefore a social integrated Europe is needed (Gerhards, Lengfeld 2015, 7-8); that it is citizenship that constitutes rights and not vice versa, nor do rights alone legitimize a democratic regime (Bellamy 2008a, 604 ff.); that citizenship is primarily made of practices in everyday life (Halsaa et al. 2012, 3), of an affective allegiance to the community (Bellamy 2011, 2), of a sense of solidarity and of a civil consciousness (Pukallus 2016, 1 ff.). Citizenship consists in a common *status civitatis*, not in a set of rights alone (Mindus 2017, 8).

– Technical or political
Some view EU citizenship – and especially the way it is implemented – as a purely technical arrangement, not only because it is operated by officials, with possible shortcomings in technocratic governance, but also since it is based on formal standards and procedures that exclude the mobilization of a political will. In this sense, the primacy of the ECJ judges is also, in a sense, proof of this non-political way of governing EU citizenship (Bellamy 2008, 607 ff.). In spite of their political effects, the management of crises, such as the 2008 recession, is purely technical (Kostakopoulou 2011, 16-18).
On the other side, Community citizenship management is viewed as highly political. Since its original conception, it was considered as a necessary tool to avoid a market orientation of the European community (Pukallus 2016, 8 ff.). A clear example is the current migration policy, which is dependent on political concerns – especially in the age of populism – and does not take into account established principles, norms and regulations of the EU (Menéndez, Olsen 2020, 7), almost as a permanent "state of exception" (Karolewski 2010, 147).

– From above or from below
A largely shared view conceives Community citizenship as an institutional arrangement (or invention: Pukallus 2016, 1 ff.), established and operated by the EU ruling class, especially Brussels officials and judges. It is a wholly top-

down construction (Shaw 2019, 3; Kostakopoulou 2011, 16), where the definition of common identity is also managed from above with specific technologies (Karolewski 2010, 169). In other words, EU citizenship has been shaped by the interrelation between conceptual innovations, law making and institutional practice (Wiesner 2014, 5 ff.). Citizens do exist and are activated within the EU legal order (Shaw 2019, 3; Saward 2013, 230).

On the other side, citizenship is considered primarily as an outcome of citizens' practices and collective agency, especially of agonistic or conflictual forms of participation (Tambakaki 2011, 567) and alternative representation models (Saward 2013, 232 ff.), through which people, at the same time, enact citizenship and push for its redefinition in terms of content and scope (Isin 2013, 22). Feminist struggles, the anti-austerity movement, mobilization against the Bolkestein directive and the Iraq war are examples of people acting, not as an electorate, but as full citizens who autonomously exercise their rights and have a say on politics (Tambakaki 2011, 567). Contesting its boundaries is the most important way of developing citizenship and enacting democracy as well (Jenson 2007, 55; Saward 2013, 224).

– Failed promise or still to come
One thematization looks at European citizenship as an unfulfilled promise. Instead of enlarging and strengthening prerogatives, entitlements and powers of citizens, it has legitimized the weakening of social rights and of the sovereign power of people at national level, and has facilitated the free movement of the rich and of exploited workers to the detriment of the poor ("economically non-active") and of common people living in their own country (Menéndez, Olsen 2020, 2 ff.). Moreover, it has not built any sense of solidarity (Karolewski 2010, 140-141).

On the other side, citizenship of the EU is viewed as a promise that has not yet been fulfilled (Tambakaki 2011, 571), an institution under construction, which must be a real community of co-citizens, a community of fate (Moccia 2018, 34), based on the principle of residence (Menéndez, Olsen 2020, 10) and on an affective identification, that is, a political identity rather than a status (Tambakaki 2011, 571 ff.), able to fully recognize diversity of origin and lifestyles (Ammaturo 2017, 3), not necessarily linked to EU arrangements (Tambakaki 2011, 571). Development of a system of EU-level social rights could provide the sense of common citizenship that is now lacking (Schall 2012, 124). European citizenship to come will be larger, in terms of borders and boundaries, than the present EU citizenship (Isin, Saward 2013b, 6).

III. CONCEPTUAL TANGLES

What can be noticed about these couples of thematizations? A rather obvious answer to this question is that they show a situation of uncertainty about Community citizenship. Undoubtedly, European citizenship is in itself a puzzling matter, as it is widely recognized (Moro 2012, 36). However, beyond this general statement, we can discern some more specific elements from these thematizations, enabling a step forward and a more in-depth view of the problem at stake.

A first point concerns the excess of expectations for European citizenship. Though not explicitly stated, it seems that citizenship of the Community is presumed to be a well-formed arrangement, consistent with the evolution of the EU and able to concur in giving it a full democratic shape. Clearly this is not the case, but the expectations weigh a lot on the thematizations of EU citizenship.

Another point that can be noticed is the overlapping of theories, references to normative models and interpretations of material events and processes in the discourse on European citizenship. This happens, for example, when discussing the issue of citizens' rights: what they would be, what their legal basis or meaning is and how they work can be dealt with all together.

A third element to be pointed out is the mix of different disciplinary approaches. Political science, moral and political philosophy, law, sociology, anthropology, psychology, geography, history, have their own theoretical references and assumptions, methodologies, inferences and correlations, fields of research, conceptualizations. So, for example, when dealing with identity, different perspectives are used, meaning that a European identity does and does not exist.

In some way linked to the previous point, the use of one-side approaches to European citizenship is noteworthy. Regardless of whether they regard bottom-up or top-down views (just to give an example), the point is that one side risks hindering more complex views that are of greater value, especially in this case.

A further element is that the main point of reference of EU citizenship discourse is nation-state-based citizenship. This is, to some extent, obvious, and is not necessarily to be viewed through the lens of methodological nationalism, that is, in a purely negative way. However, it makes it difficult to thematize European citizenship differently from a copy, regardless of whether it is good or bad.

A sixth point concerns the wide use of normative models in analyzing, assessing and debating European citizenship. Of course, social research is

always based on normative stances. Nevertheless, an excessive resort to them implies the risk of viewing reality as a mere deviation, or even as a mistake. A good example is the reference to the ideal of the "active citizen", which citizens of Europe certainly do not conform to.

As for citizens, another element to be mentioned is the somewhat vague and general perception of them, that makes them a sort of stone guest of discourses on European citizenship. When references are made, they are usually based on sources that are incomplete, if not biased. It is the case for the issue of identity, based on opinion polls that highlight what citizens feel, not what they do. But identity is a matter of feeling and doing (as is shown by the case of the single currency, see Moro 2013), so that there can be a European identity also where citizens feel disaffection towards the EU.

Finally, it must be noticed that the discourse on EU citizenship tends to remain – as in the mainstream research on EU in general – Brussels-based. It is, of course, difficult to have comprehensive and reliable information on the EU in member countries. But, in the case of EU citizenship, this is a real bias, since the overwhelming majority of European citizens have never visited Brussels but live their European citizenship (for the best or for the worst) at home.

I am aware that from these remarks on the divergent thematizations of European citizenship it could be concluded that it is a defective or incomplete or abnormal object. This situation partly reflects the confusion and uncertainty of citizenship studies, lively but unable to reach a shared definition of what citizenship is (see Moro 2020, 5-37). However, it also shows a peculiar feature of European citizenship discourse.

IV. LOOKING FOR A WAY OUT

Is there a way out of this uncertain situation? The contributions analyzed in this paper offer some advice to answer this question. Five suggestions can be reported here.

– European citizenship as a dynamic object
A first element concerns the dynamic nature of European citizenship. Generally speaking, citizenship is not only a relational, but also a dynamic institution (Isin 2013, 27). The location of its forms and functions are always a mobile process (Shaw 2019, 3). In addition, the processes of identity-building related to citizenship evolve over time (Kostakopoulou 2011, 17), so we cannot speak of the same identity fixed in time. As for European citizenship, we should not ask what it is, but rather how it has been built over time,

overcoming a static and essentialist approach. Its meaning and scope have changed in the course of time (Pukallus 2016, 18).

Any evaluation can be made on them, the development of European citizens' rights, formalized in the Treaties and other documents (especially the European Charter of Fundamental Rights) or in ECJ case law, testifies this character. Their amount and scope have definitely increased (Mindus 2017, 18; Margiotta 2014, 89 ff), showing, according to Dora Kostakopoulou, "the admirable working of the logic of equality" (2018, 4).

– European citizenship as a matter of contestation
Another element coming from the literature review is the contested nature of European citizenship. A feature of this issue is that the establishment of borders and boundaries in terms of entitlements, benefits and prerogatives of citizenship is a matter of political and social struggle involving the citizenry, as well as of conflicts among political leaders and other relevant actors of the EU political system (Isin 2013, 19 ff.; Tambakaki 2011, 574 ff.).

More specifically, the same concepts and meanings attached to citizenship are a conflictual matter, so that one could speak of "citizenship games" regarding the cognitive dimension of citizenship, especially the definition of identity (Kostakopoulou 2011, 12). Conceptualizations of citizenship are, in other words, a very relevant political arena (Wiesner, Bjork 2014, 50). It could be said that the social and political construction of citizenship is always a cognitive struggle.

– European citizenship as a double-key mechanism
While in European studies, as well as in real political and institutional dynamics, priority was given to institutional design (Tambakaki 2011, 578), citizenship should instead be considered as a double-key mechanism. That means that it depends on what both institutions and citizens do. This does not imply an agreement, of course; but rather that citizenship is a result of institutions *and* citizen practices, meanings, and relations. As Jo Shaw puts it: "EU citizenship is not just a matter of institutional choices but also, increasingly, of choices made and routes followed by individuals and groups. It has both a top-down and a bottom-up dimension" (2019, 7).

In this context, European citizenship should also be considered as a joint object, socially constructed by actions and non-actions, consent and dissent, of both institutions and citizens. Its meaning is defined by the citizens as well (Schall 2012, 128).

– European citizenship as a mirror of national citizenship problems

As some scholars have noticed, a relevant part of the problems attributed to European citizenship are the same that national citizenships are experiencing (Tambakaki 2011, 572). In particular, according to Richard Bellamy, both sovereignty and national identity have been weakened in recent decades (2008a, 601 ff.) because of internal and external factors. The failures of party politics and accountability, of the sense of belonging to a national community, of the necessary relative cultural homogeneity, of relevant decisions taken by governments and parliaments elected by, and responsive to, the demos, are examples of this matter.

As reported above, European citizenship is supposed to be experiencing similar problems: the detachment of citizens from institutions, a lack of a sense of community, low turnout, weakness of political parties and EU parliament, scant attachment of citizens to a weak identity, etc. So, in this regard, Community citizenship, rather than dependent vs. alternative to national citizenship, can be regarded as mirroring the same criticalities.

– European citizenship as standpoint
A last point, and in a sense the most important one, that comes from scholars, is that the way in which European citizenship is analyzed and assessed should be reoriented towards a different standpoint. That is, to look through a citizenship lens (Tambakaki 2011, 572). The difficulty in solving the EU citizenship puzzle, in other words, could be due to the framework established and the thematizations set up: "There might be something in citizenship itself, in the way in which we understand this concept, which amplifies the problems facing its application at the Union level", as Paulina Tambakaki points out (*ivi*, 574). Put differently, the problems detected and discussed about Community citizenship have more to do with the "European identity talk" than with the real development of citizenship (Kostakopoulou 2011, 16), or are due to the use of inappropriate standards of comparison (Baubock 2011, 6).

All this means that a different perspective from which to look at European citizenship is needed. It should be established before any normative judgement (Jenson 2007, 66) so that, for example, the call for sacrifice and patriotism be recognized as not being pertinent to EU citizenship (Kostakopoulou 2011, 18). A necessary, but not sufficient, point of departure could be to acknowledge that when observing European citizenship, the focus should include not only arrangements, but also representations and enactments (Isin, Saward 2013b, 9).

The aim of this paper is, of course, not to solve these conceptual and methodological problems, but rather to highlight them. However, some steps

could be made in order to support the search for a more effective approach. In the following part of the text I will suggest two of these steps, related to my most recent work (Moro 2020; see also 2016). The first is to regard democratic citizenship as a phenomenon, while the second is to locate European citizenship within the context of the crisis and transformation of the citizenship acquis we have inherited.

V. BACK TO THE PHENOMENON

As we have seen, citizenship can be regarded as a normative model, as a theory or set of theories, as what happens in material and cognitive reality. While these approaches are obviously interrelated, their overlapping is one of the problems the study of European citizenship is facing. In order to address this problem, a basic definition of democratic citizenship as a phenomenon could be helpful.

– A device and three components
With this in mind, we can define democratic citizenship as a device that is functional to inclusion, cohesion, and the development of political communities. In other words, to promote, to rule and to implement the membership of individuals and groups in a political community is the functioning of democratic citizenship as a device.

As an empirical phenomenon, democratic citizenship can be viewed as being made up of the three components of belonging, rights and participation: being and feeling a member of a political community; enjoying collective benefits and rights associated with this membership; participating on an equal basis in political, social and economic processes that take place in the community (Bellamy 2008b, 12).

We can consider *belonging* as the definition of who is a citizen and who is not; or, in other words, being recognized and feeling part of the political community. Belonging therefore has two sides:
  o   A material one, consisting in a status, both legal and social, that recognizes who is part of the political community;
  o   A cognitive one, made up of feelings of identity of individuals and social groups.

The *rights* component regards standards of life taken for granted and implemented through institutional arrangements (laws, justice system, public administration) and through the exercise of duties of members of the political community.

As for the *participation* component, it can be defined as the involvement of all the members of the political community in the establishment of the institutional system, as well as of its aims, standards, and rules of the game, on an equal basis.

We can therefore look for and identify democratic citizenship by observing these three components. In other words, this phenomenon takes place when we can detect the following: membership as belonging to a political community in terms of status and identity; a set of rights that individuals and collective entities can claim and practice with the support of the state and the exercise of duties by the whole community; and forms and procedures of participation in the definition and implementation of ends, rules of the game and standards of life on an equal basis.

– Places of observation
The definition of three observable components of democratic citizenship is a necessary, but not sufficient, step. A further one regards the places where citizenship can be observed. Without this step, the risk is indeed that of considering citizenship only by looking at constitutions, or by focusing only on specific aspects such as the emotional sense of attachment to the political community, or even to diminish it to the claim for the recognition of certain rights. *Where* citizenship can be observed is, therefore, a task as crucial as asking *what* we are observing. Three places can be detected where distinctive elements of citizenship are shaped.

The first one is, obviously, *constitutional-rank norms*. In the case of European democracies these regard fundamental, but also civil, political and social rights. They embody the norms defining who a citizen of a nation-state is and the forms of political and civic participation that create and give shape to representative institutions.

The second place is what we could define c*ivic acquis or "storage"*. By civic "*storage*", I mean the set of legal- or policy-based provisions establishing the content of citizenship. This set includes laws, public policies, court decisions, administrative acts, recognized collective agreements, and other elements. By definition, this acquis is not a fixed or static compound. It changes with time, more rapidly than constitutional norms.

The third place is *citizenship practices*, that is, the dynamic relation between citizens and the polity, as well as the political community, on an everyday basis (Wiener 1998, 7). Thanks to the concept of citizenship practices, we can observe citizenship as an output not only of political decisions and institutional acts, but also of citizens' lives, a product of social meanings and actions (Bellamy, Castiglione, Shaw 2006, 1). In other words, what people do with citizenship is of crucial importance to give shape to citizenship itself.

What is the value of observing citizenship in a multiplicity of places? Three points can be mentioned in support. The first, and the most obvious, is that it provides the possibility of observing citizenship as a whole, without losing sight of its constituting dimensions. The second advantage is the chance it offers of analyzing the multiple interrelations which exist between these places. The third point is that it creates the opportunity to make visible several of the factors and dynamics that give shape to citizenship, which are otherwise difficult to observe.

Of course, this definition does not fit completely with the reality of European citizenship. There are, indeed, many gaps and deviations. The point, however, is that similar gaps and deviations can also be observed in the canonic model of democratic citizenship that we have inherited and that is often used, too easily, to negatively assess Community citizenship. We must now turn to this very important point.

VI. THE CRISIS AND TRANSFORMATIONS OF THE DEMOCRATIC CITIZENSHIP PARADIGM

For at least three decades, the canonic model of citizenship – or paradigm, or even the "Citizens' Acquis of the 20th Century" (Wiesner 2019, 217) – is experiencing deep problems that cannot be ignored.

We can identify, in a synthetic way, the main features of this paradigm, with reference to the three components mentioned above, as follows:

o   A definition of belonging strictly linked to the national dimension, materialized in a state and in a pre-existing cultural community with their borders and boundaries;

o   A system of rights that has grown over time with reference to the three "families" of civil, political and social rights, with the addition of human rights, while the duties have remained those traditionally defined (paying taxes, serving in the military, cooperating in administrating justice);

o   Participation centered on the establishment of the political system through the exercise of the vote lead by political parties, with the possibility for citizens to directly address inputs to the political system through protest or lobbying.

This paradigm is experiencing a critical condition. It is due to several facts, situations and processes that call its pillars into question. Some noteworthy examples include:

- o Belonging as a status is called into question by borders and bounda-ries that have become porous and contested; by the deep changes in social structures, such as family and work; by the escape of affluent people from common citizenship (as in the case of gated communi-ties);
- o Belonging as identity is called into question by sovereignism and "post-nationalism"; by the multiplication of identities and belong-ings; by the weakening of social ties and the "civic recession"; by the spread of communication technologies;
- o Rights are called into question by human rights in so far as rights are no longer the sole preserve of citizens; by the implementation gaps of established rights (especially social ones); by claims for new rights, based on differences and not on equality;
- o Duties are called into question by the avoidance of taxation by indi-viduals and companies; by the end of mandatory military service in most Western countries; by uncertainty about what new duties are;
- o Participation is called into question by the ineffectiveness of the ex-ercise of popular sovereignty; by the abandonment of the political system by citizens; by the weakening of political parties' traditional constituencies; by emerging alternative forms of participation and representation.

Of course, this list could be enlarged and deserves much more space. But it is enough for the purposes of this paper.

These critical situations did not lead to the disappearance of citizenship (as is currently supposed for democracy), but rather they triggered a trans-formation process. It can be detected on one side by the attempts of scholars to redefine the canonic model of democratic citizenship, and on the other side by phenomena that take place in reality and that are socially (sometimes also institutionally) constructed in terms of citizenship.

As for the first point, many scholars have worked on a possible reconfigu-ration of the democratic citizenship paradigm, enabling it to escape from crit-ical situations. The separation between citizenship and nationality, the plu-ralization of citizenship, the priority given to the principle of residence, the redefinition of political community in terms of common fate and not common origins, the relevance of new forms of participation to reinvigorate or recon-struct citizenship, the shift from identity to differences, the redefinition of the boundaries dividing public and private spheres, are all examples of this at-tempt to reconfigure the model of citizenship.

As for the second point, a number of phenomena that consist in claims for the recognition of specific forms of citizenship have been taking place for some decades. They are of various kinds, contents, scopes and institutional

statuses; but all of them are socially constructed in terms of citizenship. Urban, global, gender-based, multicultural, digital, linked to consumption or to entrepreneurship, active citizenship as autonomous citizens' mobilization for the general interest, are examples of these "citizenships".

None of these "citizenships" are fully consistent with the inherited paradigm. Yet all of them are, on one side, linked to the paradigm itself and, on the other side, they contest its contents and boundaries. We can therefore identify them by using, in a metaphorical way, the Kuhnian concept of anomaly: these "citizenships" are not puzzles that the paradigm can manage with its own resources, but rather they are problems that cannot be solved with the sole tools of the paradigm.

This is also the case of European citizenship, which is obviously not only a claim but also an institutional reality. Nevertheless, as with the other phenomena, it calls into question basic elements of the democratic citizenship paradigm, namely:

- o It is, in any case, conferred by a non-state institutional entity;
- o It is based on differences rather than of a cultural common identity (Ulrich Beck's "polygamy of languages" is a symbol of that) and on a divided past;
- o It encompasses rights that could not have meaning within a modern nation-state;
- o It gives value to residence as a basis for the recognition of certain rights;
- o It does not establish citizens' duties;
- o It recognizes participation and autonomous representation as the rights of citizens, and it includes them in the process of definition and implementation of European public policies, beyond voting and the dynamics of the political system.

What is the value of regarding European citizenship as an anomaly of the democratic citizenship paradigm? With reference to the thematizations presented and commented above, three main points can be made. The first one is that it can avoid one-sided approaches, with the consequent absolutization of one component (e.g. rights) to the detriment of the others. Secondly, it can prevent the paradox of viewing citizens either as a dependent variable or as irrelevant subjects in the life of European citizenship; or even to assign them a main role only if insurgent. Moreover, it can represent a relationship between European and national citizenships that is respectful of commonalities and interweavings, but also differences and contradictions; in any case not considering Community citizenship as a mere copy (bad or good) or a pathology of citizenship paradigm.

VII. CONCLUSIONS

This paper was devoted to the location of European citizenship as a conceptual object and as a phenomenon. It had no ambition other than trying to show and clarify problems, uncertainties, and contradictions in the way the scientific community (and beyond) deals with this institution.

I hope that, at the very end, European citizenship can be recognized as an experiment, developed not in laboratory but in the field. This, in my opinion, is the reason why it is a matter of the utmost interest, as long as we are able to recognize it as precisely as possible, in material terms. To this end, it is worthwhile to look at democratic citizenship as a phenomenon, its consolidation in a canonical model or paradigm, and the ongoing crisis and transformation of the paradigm.

For sure, European citizenship will not substitute national ones, but it will continue to mirror the criticalities of national citizenships and to have an impact – for better or for worse – on them. In any case, observing European citizenship as one of the most important – maybe the major – anomalies of democratic citizenship paradigm is of inestimable value for increasing knowledge on both citizenship in general and on the future of the European Union.

References

Ammaturo F.R. (2017), *European Sexual Citizenship Human Rights, Bodies and Identities*, Palgrave Mcmillan, Cham.

Bauböck R. (ed.) (2019), *Debating European Citizenship*, Springer Open, Cham 2019.

Bauböck R. (2011), "Three Citizenship Regimes", in Bellamy, Staiger 2011, pp. 6-10.

Bauböck R., Liebich A. (eds.) (2010), *Is there (still) an East-West Divide in the Conception of Citizenship in Europe?*, EUI Working Papers RSCAS 2010/19, Robert Schuman Centre for Advanced Studies, EUDO Citizenship Observatory.

Bellamy R. (2008a), "Evaluating Union citizenship: belonging, rights and participation within the EU", in *Citizenship Studies*, Vol. 12, No. 6, December, pp. 597–611.

Bellamy R. (2008b), *Citizenship. A very short introduction*, Oxford University Press, Oxford.

Bellamy R. (2011), "Introduction: the Identities and Rights of European Citizens", in Bellamy, Staiger 2011, pp. 2-5.

Bellamy R., Staiger U. (eds.) (2011), *EU Citizenship and the Market*, UCL European Institute, London.

Bellamy R., Castiglione D., Shaw J. (2006), "Introduction: from National to Trnsnational Citizenship", in Bellamy R., Castiglione D. (eds.), *Making European Citizens. Civic Inclusion in a Transnational Context*, Palgrave Mcmillan, London, pp. 1-28.

ERA (2013), *Citizenship, European integration and national constitutions*, Panel discussion at ERA's Twentieth Anniversary Congress "The Citizen at the Heart of European Law", *ERA Forum*, pp. 511-538, Springer, New York.

Faist T. (2001), "Social Citizenship in the European Union: Nested Membership", in *Journal of Common Market Studies*, March, Vol. 39, No. 1, pp. 37–58.

Gerhards J., Lengfeld H. (2015), *European Citizenship and Social Integration in the European Union*, Routledge, London and New York.

Halsaa B., Roseneil S., Sumer S. (eds.) (2012), *Remaking Citizenship in Multicultural Europe Women's Movements, Gender and Diversity*, Palgrave Mcmillan, Houndmills.

Isin E.F. (2013), "Claiming European Citizenship", in Isin, Saward, 2013a, pp. 19-46.

Isin E.F., Saward M. (eds.) (2013a), *Enacting European Citizenship*, Cambridge Un. Press, Cambridge 2013.

Isin E.F., Saward M. (2013b), "Questions of European citizenship", in Isin E.F., Saward M., 2013a, pp. 1-18.

Ivic S. (2016), *European Identity and Citizenship Between Modernity and Postmodernity*, Palgrave Mcmillan, London.

Jenson J. (2007), "The European Union's Citizenship Regime. Creating Norms and Building Practices", *Comparative European Politics*, 5, pp. 53–69.

Karolewski I.P. (2010), *Citizenship and Collective Identity in Europe*, Routledge, London and New York.

Kochenov D. (2011), "New European Citizenship: a Move beyond the Market Bias", in Bellamy, Staiger 2011, pp. 11-15.

Kochenov D. (2010), "Rounding Up The Circle: the Mutation of Member States' Nationalities under Pressure from EU Citizenship", EUI Working Papers RSCAS 2010/23, Robert Schuman Centre for Advanced Studies EUDO Citizenship Observatory.

Kostakopoulou D. (2018), "*Scala Civium*: Citizenship Templates Post-Brexit and the European Union's Duty to Protect EU Citizens", in *Journal of Common Market Studies*, pp. 1–16.

Kostakopoulou D. (2011), "On European Identity", in Bellamy, Staiger 2011, pp. 16-18.

Lenaerts K. (2013), "The concept of EU citizenship in the case law of the European Court of Justice", in *ERA Forum*, 13, pp. 569–583.

Margiotta C. (2014), *Cittadinanza europea. Istruzioni per l'uso*, Laterza, Roma-Bari.

Martinico G., Castaldi R. (eds.) (2011), *Rethinking (EU) citizenship*, *Perspectives on Federalism*, Vol. 3, issue 2, Centro studi sul federalismo, n.p.

Menéndez A.J., Olsen E.D.H. (2020), *Challenging European Citizenship. Ideas and Realities in Contrast*, Palgrave Mcmillan, Cham.

Mindus P. (2017), *European Citizenship after Brexit. Freedom of Movement and Rights of Residence*, Palgrave MacMillan, Cham.

Moccia L. (2018), "Legal comparison and European law: or the paradigm shift from a territorial to a spatial viewpoint, in the prospect of an open and cohesive society based on European citizenship as model of plural and inclusive citizenship", in *La cittadinanza europea*, May, pp. 27-39.

Moro G. (2020), *Cittadinanza* [Citizenship], Mondadori Università, Milano.

Moro G. (2016), "Democratic Citizenship and Its Changes as Empirical Phenomenon", in *SocietàMutamentoPolitica*, vol. 7, n. 13, pp. 21-40.

Moro G. (ed.) (2013), *The Single Currency and European Citizenship. Unveiling the Other Side of the Coin*, Bloomsbury Academic, New York.

Moro G. (2012), *Citizens in Europe. Civic Activism and the Community Democratic Experiment*, Springer, New York (original edition: *Cittadini in Europa. L'attivismo civico e l'esperimento democratico comunitario*, Carocci, Roma, 2009).

Pukallus S. (2016), *Representations of European Citizenship since 1951*, Palgrave Mcmillan, London.

Saward M. (2013), "Enacting Citizenship and Democracy in Europe", in Isin, Saward, 2013a, pp. 220-237.

Schall C.E. (2012), "Is the Problem of European Citizenship a Problem of Social Citizenship? Social Policy, Federalism, and Democracy in the EU and United States", *Sociological Inquiry*, Vol. 82, No. 1, February, pp. 123–144.

Shaw J. (2019), "EU Citizenship: Still a Fundamental Status?", in Baubock, 2019, pp. 1-20.

Tambakaki P. (2011), "Agonism and the Reconception of European Citizenship", in *British Journal of Politics and International Relations*, vol 13, pp. 567–585.

van Eijken H. (2015), *EU Citizenship & the Constitutionalisation of the European Union*, Europa Law Publishing, Groningen-Amsterdam.

Wiener A. (1998), *"European" Citizenship Practice. Building Institutions of a Non-State*, Westview Press, Boulder.

Wiesner C. (2019), *Inventing the EU as a Democratic Polity Concepts, Actors and Controversies*, Palgrave Mcmillan, Cham.

Wiesner C. (2014), "The Europeanization of Citizenship Conceptual Innovations, Legal Changes, and Development of New Institutional Practices", in *Contributions to the History of Concepts*, Volume 9, Issue 1, Summer, pp. 88–104.

Wiesner C., Bjork A. (2014), "Citizenship in Europe after World War II— the Challenges of Migration and European Integration", in *Contributions to the History of Concepts*, Volume 9, Issue 1, Summer, pp. 50–59.

CENTRO DI STUDI EUROPEI (CSE)
WORKING PAPERS

Working papers

Working papers

**ULTIME PUBBLICAZIONI DELLA COLLANA
CSE WORKING PAPERS**

IL CENTRO DI STUDI EUROPEI

Il Centro di Studi Europei (CSE), fondato nel 2012, promuove e valorizza la ricerca sulla società, la storia, la politica, le istituzioni e la cultura europea, mettendo assieme le conoscenze dei ricercatori di diverse aree disciplinari del Dipartimento di Studi Politici e Sociali (DiSPS) dell'Università degli Studi di Salerno. Compito del Centro è la promozione della discussione pubblica sul tema dell'Europa mediante l'organizzazione di seminari e convegni nazionali ed internazionali, la cura di pubblicazione di studi e ricerche, la presentazione di libri, la promozione di gruppi di studio e di ricerca anche mediante il reperimento di fonti di finanziamento presso enti privati, pubblici e di privato sociale. Esso offre un supporto di ricerca scientifica e di pertinenti servizi alle attività didattiche di lauree triennali, magistrali e a master dedicati al tema dell'Europa e si propone di sviluppare e favorire contatti con enti, fondazione e Centri di altre università nazionali ed internazionali interessati alle questioni oggetto di ricerca da parte del Centro, anche attraverso lo scambio di ricercatori tra di essi.

CENTRO DI STUDI EUROPEI (CSE)
Dipartimento di Studi Politici e Sociali
Università degli Studi di Salerno
Via Giovanni Paolo II, 132
84084 Fisciano (Salerno), Italy
Tel: +39 (0)89 962282 – Fax: +39 (0)89 963013
mail: direttore@centrostudieuropei.it
www.centrostudieuropei.it