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Migrant mobilization between political institutions and citizenship regimes: A comparison of France and Switzerland

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Abstract. This article focuses on the political claims made by immigrants and ethnic minorities in France and Switzerland. We look at cross-national variations in the overall presence of immigrants and ethnic minorities in the national public space, and the forms and content of their claims. Following a political opportunity approach, we argue that claim-making is affected both by institutional opportunities and by national models of citizenship. The civic-assimilationist conception of citizenship in France gives migrants greater legitimacy to intervene in the national public space. Furthermore, the inclusive definition of ‘membership in the national community’ favors claims pertaining to minority integration politics. However, the pressure toward assimilation to the republican norms and values tends to provoke claims for the recognition of ethnic and cultural difference. Finally, closed institutional opportunities push migrants’ mobilization to become more radical, but at the same time the more inclusive model of citizenship favors a moderate action repertoire of migrants. Conversely, the ethnic-assimilationist view in Switzerland leads migrants to stress homeland-related claims. When they do address the policy field of ethnic relations, immigration and citizenship, they focus on issues pertaining to the entry and stay in the host society. Finally, the forms of action are more moderate due to the more open institutional context, but at the same time the action repertoire of migrants is moderated by the more exclusive model of citizenship. Our article is an attempt to specify the concept of ‘political opportunity structure’, and to combine institutional and cultural factors in explaining claim-making by immigrants and ethnic minorities. We confront our arguments with data from a comparative project on the mobilization on ethnic relations, citizenship and immigration.

A great deal of work on contentious politics during the past three decades has followed the political process approach in trying to account for the emergence, dynamics and outcomes of social movements, both comparatively across countries and over time (e.g., McAdam 1999; McAdam et al. 2001; Tarrow 1998; Tilly 1978). The central concept in this perspective is that of *political opportunity structures* (Brockett 1991; Della Porta 1995; Kitschelt 1986; Kriesi et al. 1995; McAdam 1996; Tarrow 1998), which refers to political-institutional aspects of the movements’ context such as the relative openness or closure of the institutionalized political system, the stability or instability of that broad set of elite alignments that typically undergird a polity, the presence or absence of elite allies, and the state’s capacity and propensity for repression (McAdam 1996).

While explanations over at least the past two decades have stressed the impact of such structural factors as political institutions and the individuals' embeddedness in social networks, the recent emphasis on culture as expressed in phenomena such as collective identities, public discourse and symbolic narratives (Gamson 1992; Johnston & Klandermans 1995; Morris & McClurg Mueller 1992; Melucci 1996; Polletta 1998a, 1998b; Somers 1992, 1994; Tilly 1998, 1999), has brought the attention back to cultural variables in social movement theory. Only rarely, however, have these works integrated culture into a theory that acknowledges the decisive impact of political opportunities on the nature and forms of protest activities.

We think that the study of contentious politics would benefit greatly from an approach that pays more attention to the role of collective frames and public discourse, while at the same time capitalizing on the advances made by research with respect to political opportunity structures. Several recent works on social movements and contentious politics have indicated a way of bringing culture, framing and discourse into the political opportunity structure model, hence integrating institutional and cultural explanations of protest. These works usually distinguish between the political/institutional and the cultural/discursive side of opportunities (e.g., Diani 1996; Gamson & Meyer 1996; Goldstone 1998).

Attempts to integrate institutional and cultural aspects of the political opportunity structure in order to provide a more satisfactory account of political claim-making are also being made in the specific field of immigration studies. Koopmans and Statham (1999a), for example, have looked at the relation between discursive and institutional opportunities to explain the differential success of the extreme right in Germany and Italy. They made an analogous attempt in relation to the mobilization by migrants and, more generally, to political claim-making in the field of ethnic relations, citizenship and immigration (Koopmans & Statham 1999b, 1999c). Our approach builds upon this perspective, which is more helpful for our specific purpose of explaining cross-national variations in claim-making by immigrants and ethnic minorities.

More precisely, in line with recent calls for a specification of the dimensions of political opportunity (e.g., McAdam 1996), we try to go a step further by specifying certain dimensions of opportunities that are of special relevance for the policy field of ethnic relations, citizenship and immigration. We do so by looking at a tradition that has stressed variations in the modes or regimes of incorporation of migrants in the host society. We capture this aspect of opportunities through the concept of 'models of citizenship'. We argue that contentious politics is enabled or constrained not only by (political) institutions, but also by the shared (cultural) understandings and collective defini-

tions of the groups involved and of the ways in which the members of those groups should be included in or excluded from the larger community – in this case, the national state.

We confront our argument with data from the 1990s on political claim-making by immigrants and ethnic minorities in France and Switzerland, two countries that differ substantially in the political opportunity structures for the mobilization of social movements in general and of migrants in particular. Theoretically, our approach is also inspired by Patrick Ireland's (1994: 10) institutional channeling theory, insofar as he stresses the impact of the institutional context on immigrant mobilization and, at the same time, looks at dimensions of political opportunities specific to the field of immigration and ethnic relations. In his perspective, '[t]he political opportunity structure includes the immigrants' legal situation; their social and political rights; and host-society citizenship laws, naturalization procedures, and policies (and nonpolicies) in such areas as education, housing, the labor market, and social assistance that shape conditions and immigrants' responses'. In addition, he looks at the role of indigenous organizations as institutional gatekeepers that control the access of immigrants to political participation.

Our approach, however, differs from Ireland's in at least three respects. First, his primary explanandum is the forms taken by immigrant political participation. Although we also look at forms of action, our main focus is on the nature of claims and their specific content. Second, he conceives of allies and opponents (i.e., 'gatekeepers') as being part of the political opportunity structure. We examine how gatekeepers act in ways that depend on opportunity structures, specifically on models of citizenship. Third, and perhaps more fundamentally, he takes concrete policies and laws as part of the opportunity structure. We think that they are also influenced by the latter, specifically by the national models of citizenship. This does not mean that we challenge Ireland's theory or approach. Our analysis is located at a different level and focuses on different aspects. It is more neo-institutionalist to the extent that, in addition to concrete political institutions such as legal systems or channels for participation, we look at the shared understanding of the criteria of inclusion and exclusion of outsiders as the cultural substratum in which concrete institutions are embedded and by which they are influenced.

The structure of migrant populations in France and Switzerland

France and Switzerland are traditional receiving countries. Both recruited large numbers of immigrants as foreign labor in the period after the Second World War in order to fill the needs of an expanding economy. In the

mid-1970s, when the economic crisis produced recession and higher unemployment rates, the inflow of migrants did not stop completely, in spite of all the efforts on the part of governments to close borders (Hollifield 1992). Family reunification and, to a lesser extent, increasing flows of asylum seekers and illegal aliens became the principal sources of immigration after the oil crisis.

The structure of the population of migrant origin, however, is quite different in the two countries, not least because of France's colonial past. First of all, in 1990 the share of the foreign population equaled 6.4 per cent in France and 16.3 per cent in Switzerland (Soysal 1994; Swiss figures exclude seasonal and frontier workers). This difference, of course, stems in part from Switzerland's restrictive rules for obtaining citizenship rights. The difference in the share of immigrants, including citizens of migrant origin, is in fact much less pronounced. Yet for our present purpose it is more useful to look at the national composition of migrants. Immigrants in France come above all from two geographic areas: Southern Europe (Italy, Spain and Portugal)¹ and the Maghreb countries (Algeria, Morocco and Tunisia). The strong presence of immigrants from the Maghreb is reflected in a large part of the population being of Islamic religion. Its relationship with the national majority and the state is probably the major challenge faced by France today in terms of ethnic relations and the politics of difference.

In Switzerland, like in France, there is a strong presence of Italians, Spaniards and Portuguese. The proportion of these three communities, however, varies considerably. Italy is by far the largest among all foreign nationalities. Indeed, Italians have long defined the entire immigration issue in Switzerland (Pittau & Ulivi 1986). Generally speaking, the main difference with France lies in the lack of a substantial Maghrebian community, although in certain local situations in the French-speaking part of the country (especially Geneva) its presence is not negligible. Another characteristic of the structure of the foreign population in Switzerland is the high proportion of immigrants from former Yugoslavia, although the share of people coming from the Balkans has been subject to strong shifts over time due to the arrival (and departure) of war refugees (Albanians and Bosnians, in particular) escaping the dramatic situation that has occurred in that region during the last decade.² Finally, we should note that the proportion of Turks is quite similar in the two countries (about 5 per cent of the total foreign population).

Political opportunities and the mobilization of social movements

Political opportunity theories stress the impact of institutional factors on political contention and claim-making. This has been done basically following

two directions: first, cross-sectionally to account for variations in the levels and forms of protest in different (national) settings (e.g., Kitschelt 1986; Kriesi et al. 1995; Rucht 1994); second and most frequently, longitudinally to explain the rise and fall of a movement or set of movements in a given context as well as the changing patterns of mobilization over time (e.g., Costain 1992; Kriesi et al. 1995; McAdam 1999; Meyer 1990; Tarrow 1989). In both cases, the standard explanandum is the amount of protest and/or the forms it takes. The underlying assumption in this perspective, as in the political process approach more generally, is that people who act to form a social movement make strategic choices that are strongly influenced by certain features of their political-institutional context.

For Kriesi et al. (1992, 1995), political opportunity structures are made up of four dimensions: the salience of existing cleavages in society, the configuration of power, certain features of the formal political institutions and the prevailing strategies of authorities to deal with challengers. The latter two aspects are relevant to the explanation of action repertoires. By combining them, we obtain the typology of the general structural setting for the mobilization of social movements shown in Figure 1 (although we focus on France and Switzerland in this article, we include other countries in the typology for illustrative purposes). The combination of open political institutions and inclusive prevailing strategies results in a setting labeled 'integration' by Kriesi et al. (1995), in which movements have facilitated access to the political system and, at the same time, are rarely repressed. Switzerland is perhaps the best empirical approximation of this case. France typifies the opposite situation, called 'selective inclusion', in which a closed system is generally accompanied by exclusive prevailing strategies.

According to this view, when social movements are faced with repression coupled with a lack of access to the political system, they tend to radicalize

		Formal institutions		
		Open	Closed	
Prevailing strategies	Inclusive	CH	NL	GB
	Exclusive	I	D	F

Figure 1. The institutional setting for mobilization by challengers.

Source: Adapted from Kriesi et al. (1995: 37).

their actions since closed opportunity structures yield little facilitation, poor chances of success and a high degree of threat in case of inaction (Kriesi et al. 1995; Tilly 1978). France typifies this situation. By contrast, movements tend to make use of moderate forms of action when they find open political opportunity structures – that is, when they encounter little repression and many points of access to the system. This combination offers higher facilitation, increases the chances of success and diminishes the degree of threat. This is the case in Switzerland. Kriesi et al. (1995) have shown this explanation to hold for social movements in general and for the new social movements in particular. The question is to what extent this also applies to migrant mobilization.

Most of the time political opportunity theorists have focused on the emergence of social movements or the extent and forms of their mobilization. As McAdam et al. (1996: 7) have pointed out: ‘virtually all “theories” in the field are, first and foremost, theories of movement emergence’. Much less explored is how political opportunities may influence the content of mobilization. We would like to inquire more thoroughly into the determinants of the specific content and thematic focus of claims by immigrants and ethnic minorities. We do so by looking at cultural aspects of opportunities that follow from the national models of citizenship. To look not only at the forms, but also at the content, of claims is important for a variety of reasons. First of all, this gives us a chance to improve our knowledge of social movements by highlighting the limitations of existing theories based on a political institutional framework. Second, we still lack systematic empirical knowledge about the specific claims made by immigrants and ethnic minorities. Do they ask for better integration into the host society? Do they express their need for recognition as collectivities? Do they mobilize in reaction to, and with the aim of influencing, events occurring in their homeland? To answer these and related questions is of great importance in reaching an understanding of the political participation of migrants in multicultural societies that rests on systematic observation rather than on recurring examples of minority demands whose empirical representativeness is at least doubtful. Finally, knowing the content of claims is important for the analysis of state policies and responsiveness in the field of immigration and ethnic relations since effective state responses must adapt to what is claimed.

Models of citizenship: a specification of the political opportunity structure

Institutions can be defined as ‘basic rules of the game or principles of order that characterize a particular society at a particular point in time’ (Clemens

1998: 110). Such principles can be anchored in a society's political life and crystallize in concrete power relations and forms of government. Political opportunity structures represent this aspect of institutions in the terrain of social movement theory. However, as recent trends in institutionalist theory in history, sociology and political science have pointed out (e.g., Powell & DiMaggio 1991; Scott 1995; Steinmo et al. 1992), institutions also have a cultural side. Thus, 'durable or regular patterns of social life reflect deeply embedded, at times sacralized, cultural components' (Clemens 1998: 117). In addition, institutions draw their effectiveness not only from the internalization of norms and practices or from the power of social sanctioning, but also from the collective definitions and public discourses that make them part of a shared identity. Models of citizenship capture much of the shared identity for the specific 'institution' represented by the national state. For this reason, they are of crucial importance for the definition of the contested boundaries of the political field of immigration and ethnic relations.

Recent comparative work on national regimes for the incorporation of migrants have stressed the importance of citizenship rights (Brubaker 1992; Castles 1995; Favell 1998a; Koopmans & Statham 1999b, 2000; Smith & Blanc 1996; Soysal 1994). Brubaker's (1992) work points to the cultural foundations of national states and how present-day formal definitions of citizenship reflect deeply rooted understandings of nationhood. In his comparison of France and Germany, he shows that the German *jus sanguinis* legal tradition is based on a conception of the national community in ethnocultural terms, while the French tradition, which emphasizes the *jus solis* rule, stems from a republican, contractualistic and political definition of the state. He explains this difference by referring to the divergent history of state formation in the two countries: 'In France, then, a bureaucratic monarchy engendered a political and territorial conception of nationhood; while in Germany, the disparity in scale between supranational Empire and the subnational profusion of sovereign and semisovereign political units fostered the development of an ethnocultural understanding of nationhood' (Brubaker 1992: 4). In brief, German citizenship is ethnic-based and reflects the idea of the *nation-state*, while French citizenship is civic-based and reflects the idea of the *nation-state*. Both components are constitutive of the national state as a form of political organization, although in diverse mixtures. Of course, this is an old idea that goes back to Meinecke's (1919) distinction between *Kulturnation* and *Staatsnation*. What is new, we think, is our effort to examine how these different ways to conceive a nation affects the political claim-making in the field of immigration and ethnic relations.

In spite of the importance of this aspect, models of citizenship are not only defined by the prevailing conceptions of nationhood. The cultural obligations

posed on immigrants to be accepted in the national community play a role as well (Koopmans & Statham 1999b, 2000). Just as states have formal criteria for access to citizenship that can vary from one country to another, they also place different cultural obligations on defining the access to citizenship. Again, we can distinguish between two ideal-types: those states that follow an assimilationist (or monist) approach and those that adopt a pluralistic view. The former are more demanding, for immigrants are asked to conform to the cultural norms and values of the host society. The latter are less restrictive, for they provide for the recognition of ethnic difference and sometimes even actively promote it.

We can conceptualize the political opportunity structure for claim-making by immigrants and ethnic minorities as resulting from different combinations of the formal criteria of citizenship and the cultural obligations for having access to it (Koopmans & Statham 1999b, 2000). Figure 2 shows the resulting typology, which yields four models of citizenship – that is, four national regimes of incorporation of migrants (examples outside France and Switzerland are included for illustrative purposes). First, the combination of an ethnic definition of nationhood and citizenship with an assimilationist view of cultural obligations gives us a situation in which it is very difficult for foreigners to become members of the national community. This situation corresponds to the *ethnic-assimilationist model of citizenship*³ – a regime of incorporation that pushes towards assimilation to the norms and values of the national community on an ethnocultural basis and tends to exclude those who are not entitled to sharing its norms, values and symbols.

Minorities face both an exclusionary national community and a demanding environment in terms of the extent to which they have to adapt to the rules and cultural codes of the host country, hence downplaying their ethnic difference. Germany, despite recent liberalization of naturalization procedures, is perhaps the best empirical approximation of this model. Among new countries of immigration, Italy is another example. Most importantly for our purpose, Switzerland also follows this model. While Switzerland is pluralist toward the cultures traditionally recognized within the context of federalism and the existing informal procedures for the integration of national minorities, it is much less pluralist toward ethnic minorities of migrant origin, especially those who arrived most recently. Immigrants are asked to adapt to the new cultural context. Of course, they cannot do so with respect to a national cultural model, as it simply does not exist, but the acquisition of Swiss citizenship is locally based and prospective citizens must assimilate to the local habits and values – that is, to the local culture.

A second group in Figure 2 is found where a civic conception of citizenship combines with a pluralistic view of cultural obligations. This is the

		Formal criteria for citizenship	
		Ethnic (0)	Civic (1)
Cultural obligations for citizenship	Assimilationism (1)	D I CH	F
	Pluralism (0)		GB NL

Figure 2. The cultural setting for mobilization by immigrants and ethnic minorities.

civic-pluralist model of citizenship, which is exemplified by Britain and the Netherlands. Foreigners born in the host country are in principle granted citizenship regardless of their ethnic origin and minorities are recognized their right to ethnic difference.

The third type combines a civic conception of citizenship and an assimilationist view of cultural obligations. This is the case of France, which is the archetypal example of the *civic-assimilationist model of citizenship*. It is relatively easy to obtain French citizenship, but the price to be paid for that is giving up ethnic-based identities in favor of accepting the republican ideal of the state.

Finally, the fourth type couples an ethnic conception of citizenship with a pluralistic view of cultural obligations (what we refer here to as ‘civic pluralism’ is often referred to in the literature as well as in political debates as ‘multiculturalism’). This model, which we call the *ethnic-pluralist model of citizenship*, is probably less common than the other three. On the level of actual practice, it has sometimes been so stretched as to translate into segregationist policies, like in South Africa under Apartheid. The millet system of the Ottoman Empire is another example,⁴ but organized along religious rather than ethnic lines insofar as a subject population is ruled through the hierarchy of religious leaders and the grouping of individuals according to their religion.

An empirical assessment of the models of citizenship in France and Switzerland

One of the main weaknesses of the political opportunity approach to social movements lies perhaps in the lack of an empirical measure of the

independent variable (i.e., political opportunity structures). This considerably weakens the strength of the approach and of explanations based on such variables, as one has to rely on secondary literature or on a quite impressionistic picture of the opportunity structure in a given country. In order to avoid this pitfall, we have gathered systematic information on a series of indicators for each of the two dimensions of the models of citizenship in France and Switzerland. We deal in more detail with this aspect elsewhere (Giugni & Passy 2003). Here it is enough to summarize the main results. Tables 1 and 2 present the complete sets of indicators, respectively, for the formal and the cultural dimension. We assigned a score between 0 and 1 to each indicator, depending on the degree to which the indicator pointed to an ethnic or civic

Table 1. Scores for France and Switzerland on the formal dimension of citizenship

Indicators	France	Switzerland
<i>Acquisition of nationality</i>		
(1) First generation		
Number of years required	1	0
Costs	1	0
Financial independence required	1	0
(2) Second generation		
<i>Jus solis</i>	1	0
Special measures for easier access	1	0.50
(3) Special rights for national minorities	0	0
(4) Double nationality	1	1
(5) Naturalization rate	1	0
<i>Social and residence rights</i>		
(6) Residence statuses	1	0
(7) Family reunification	1	1
(8) Expulsions	1	0
(9) Access to labor market	0.50	0
(10) Access to welfare state	1	1
(11) Access to property, credits, etc.	1	0
<i>Political rights</i>		
(11) Voting rights	0	0.25
<i>Anti-discrimination measures</i>		
(12) State agencies to fight discriminations (race, ethnicity, religion)	0.50	0.50
Total	13	4.25

Note: Scores are assigned on a five-point scale (0, 0.25, 0.50, 0.75, 1). Values close to 0 indicate an ethnic conception of citizenship. Scores close to 1 indicate a civic conception of citizenship.

Table 2. Scores for France and Switzerland on the cultural dimension of citizenship

Indicators	France	Switzerland
<i>School system</i>		
(1) Islamic schools	0	0
(2) Islamic education in public schools	0	0.50
(3) Authorization to wear the Islamic veil		
Pupils	1	1
Teachers	0	0
<i>Military system</i>		
(4) Authorization not to wear the uniform	0	0
<i>Public media system</i>		
(5) Islamic programs on public channels	0	0
(6) Foreign language programs on public channels	0	0
<i>Religious practices</i>		
(7) Call to prayer (<i>el muezim</i>)	0	0
(8) State-financed training of <i>imams</i>	0	0
(9) Circumcision	1	0.50
(10) Ritual slaughter of animals	0.50	0
(11) Islamic cemeteries	0.50	0.50
<i>Political practices</i>		
(12) Representative bodies for foreigners	0.25	0.50
<i>Labor market practices</i>		
(13) Positive discrimination policy in the private sector	0	0
(14) Positive discrimination policy in the public sector	0	0
<i>Citizenship practices</i>		
(15) Conditions for naturalization	0	0
Total	3.25	3

Note: Scores are assigned on a five-point scale (0, 0.25, 0.50, 0.75, 1). Values close to 0 indicate a pluralist view of the cultural obligations of migrants. Values close to 1 indicate an assimilationist view of the cultural obligations of migrants.

conception of citizenship (formal dimension) or a pluralist or assimilationist view of cultural obligations (cultural dimension).

Our indicators for the cultural dimension focus on the question of the recognition of Islam. We opted for this specific factor mainly for two reasons. First, it was very problematic to have a more general assessment for all types of ethnic or religious groups and, second, Islam is currently at the center of public discourses and policy measures with respect to the politics of ethnic difference. Scores have been assigned on a five-point scale (0, 0.25, 0.50, 0.75, 1). On the formal dimension, the value 0 was assigned to those indicators with the maximum degree of ethnic-based conception of citizenship, the value 1 to

those indicators with the maximum degree of civic-based conception of citizenship and the intermediate values accordingly in between. Similarly, on the cultural dimension, the value 0 was assigned to those indicators with the maximum degree of pluralist view of the cultural obligations, the value 1 to those indicators with the maximum degree of an assimilationist view of the cultural obligations, and the intermediate values accordingly in between. In order to make the reading of the typology easier, Figure 1 shows which side of the two continua the 0 and 1 values fall.

Based on the two sets of indicators, we can place our two countries within the typology shown in Figure 1, this time on empirical grounds. France and Switzerland are clearly in different, if not completely opposite, groupings in terms of the formal criteria of citizenship. As we have hypothesized, and as the literature in general correctly indicates, France follows a civic conception of citizenship, while Switzerland has a prevailing ethnic definition. At the same time, however, this empirical assessment allows us to nuance an excessively idealistic view of the models of citizenship in the two countries. On the one hand, while France certainly lies within a civic conception of citizenship, since it scored 13 points out of a maximum possible total of 16 (i.e., a maximum score of 1 point on all the indicators), it is in some respects closer to the ethnic pole of the continuum – for example, in terms of political rights, access to the public sector labor market and effective state agencies to fight racial, ethnic and religious discriminations. Similarly, Switzerland is closer in some respects to the civic pole of the continuum as it scored 4.25 points over a maximum possible total of 16. On the other hand, significant changes have occurred in recent years – for example, the introduction of dual nationality, the diminution of the costs of naturalization procedures and the introduction of an anti-discrimination law.

While France and Switzerland differ in the formal criteria of citizenship, they share similar ways of dealing with ethnic difference. Both France and Switzerland follow an assimilationist view of the cultural obligations of migrants. Therefore, the tentative positioning of the two countries within the typology shown in Figure 1 is correct also with respect to this dimension. Over a maximum total possible of 16 points, France scores 3.25 points and Switzerland 3 points, which places them clearly towards the assimilationist pole of the continuum. Again, the assimilationist view is incomplete, for both France and Switzerland display some flexibility in the recognition of ethnic and cultural difference, such as allowing the Islamic veil to be worn in schools, Islamic cemeteries and male circumcision. Yet the general policy is one of denial of the difference of ethnic groups in favor of allegiance to the norms and values of the host society.

The empirical assessment of the models of citizenship in France and Switzerland also allow us indirectly to respond to the recent criticisms addressed to national models of citizenship (e.g., Brubaker 1999; Favell 1998b; Weil 2002). Brubaker (1999) has called into question the distinction between civic and ethnic conceptions of the nation. More specifically, he has acknowledged that this distinction is problematic from both a normative and an analytical point of view, and proposes to replace it with the distinction between state-framed and counter-state nationalism. However, the brief analysis summarized here shows that this approach remains useful to distinguish between national traditions in the way states deal with ethnic difference and that such models can indeed be observed empirically.⁵

Data retrieval and methods of analysis

We confront our theoretical arguments with data from an ongoing comparative research project on the mobilization of ethnic relations, citizenship and immigration.⁶ The data were retrieved by content analysis of one national newspaper in each country (*Le Monde* in France and the *Neue Zürcher Zeitung* in Switzerland). Claims were sampled by coding every second issue of the newspaper source for the period from 1990 to 1998. We define a 'political claim' as any strategic intervention, verbal or non-verbal, made on behalf of a collectivity and visible in the public space that bears on the interests or rights of other collectivities. These include: protest actions and collective mobilizations (street demonstrations, petitions, confrontational and violent actions, etc.), speech acts (public statements, written reports, media-addressed events in general, etc.) and political decisions (laws, administrative acts, judicial decisions, etc.).

We coded claims pertaining to immigration and asylum policy, minority integration politics (including citizenship) and antiracism. These claims define the political field of ethnic relations, citizenship and immigration. In addition, we coded all claims by migrants, regardless of their relation to this field. Homeland politics is included in this subsample. Finally, we coded all claims by extreme-right actors. In this article, we consider only claims by immigrants and ethnic minorities. Most of the analyses below consider both verbal (i.e., speech acts) and non-verbal (i.e., protest actions and collective mobilizations) claims. However, we excluded non-verbal claims from the analysis of the thematic focus of migrant claims.

For each claim retrieved, we coded a number of relevant variables. The most important are: the location in time and place of the claim, the actor who

makes the claim, the form of the claim, the content of the claim, the target of the claim and the object of the claim. The coding was done following a semi-open system of code lists which allowed us to obtain as much detail as possible on the variables of interest and, at the same time, provided a structured scheme of data collection. In particular, the code list for the aim of the claims has been left open and coders asked to add new codes each time they encountered a new type of claim. The information contained in the raw variables has been summarized in a set of variables to be used in cross-national comparisons. The analyses presented in this article are based on these summary variables.

In line with our theoretical aim to combine institutional and cultural variables in the study of contentious politics in general, and of the claim-making by immigrants and ethnic minorities in particular, the method we adopt is an elaboration of protest event analysis – an approach that has become popular in recent years among political opportunity theorists, who used it to gather systematic evidence on the levels and forms of social movement mobilization. The method adopted here – ‘political claims analysis’ – expands traditional protest event analysis in at least three ways (Koopmans & Statham 1999c). First, it looks not only at protest events as unconventional actions by non-institutional actors, but also takes into account all types of claims and interventions in the public space. Second, and related to that, it considers all kinds of collective actors – both institutional and non-institutional – in addition to social movement organizations and groups. Third, it places the content of claims at center stage by giving much more detail in the description of the thematic focus of events.

Previous work on social movements and contentious politics has proved the robustness of protest event analysis as a way to measure movement mobilization (e.g., Kriesi et al. 1995; Olzak 1989; Tarrow 1989; Tilly et al. 1975; see further Rucht et al. 1998). However, legitimate doubts may be raised as to possible biases stemming from the use of newspapers as a source for the retrieval of events. First of all, criticisms may be addressed to our choice to rely only on a single newspaper in each country. This choice stems in part from practical reasons as it is simply too time-consuming to collect event, or even worse, claim data over a long period for more than one country and for a wide range of actors. Existing assessments of this methodology, however, have shown that the choice of single newspaper provides robust results. For example, Koopmans (1998) has compared the data of Kriesi et al. (1995), who relied on a single source in each of the four countries studied, with those collected in the Prodat project on Germany (see Hocke 1998; Rucht & Neidhardt 1998), who used two different newspapers. In spite of a number of differences in the data collection procedure used in the two cases, he found (quite encouragingly for

us) that a comparison of the development of the number of protest events yields highly similar results, with a correlation close to 0.94. In addition, he also found very similar development of both the number of events and the number of participants of the anti-nuclear movement. Second, again concerning the sampling strategy, some have criticized the use of a non-random sample, especially the choice to take only the Monday issue of the paper (Barranco & Wisler 1999). Since we took every second newspaper issue, biases due to sampling should be much less relevant in our case. Our sample is more comprehensive than the one based on the Monday issue and is not biased toward events occurring during the weekend. Therefore, this problem is largely avoided here.

Apart from sampling issues, the use of newspapers to measure protest events or political claims may lead to selection and description biases (McCarthy et al. 1996). First, selection biases could be important when one looks only at social movement actions and protest events, as the publication of events is influenced by their size, radicalness and novelty, as well as by the issue attention cycle (Danzger 1975; McCarthy et al. 1996; Snyder & Kelly 1977). However, here we are interested not only in protest events, but in all forms of action, including speech acts and political decisions. The selection bias is likely to be less important for this kind of events. Furthermore, we take newspapers as the vehicle for the debates occurring in the public space. Therefore, the filter made by newspapers allows us to assess the degree of access of social and political actors to the public space. Second, description biases should not be too strong insofar as we are coding the actors' stated goals and not the journalists' judgements or analyses of the event at hand. Comparisons made with additional newspapers for the cases of Britain and Germany on data equivalent to those we analyze here suggest that description biases are limited (Koopmans & Statham 1999b).

In sum, in spite of limitations which do exist and which we must acknowledge, newspapers are a good source for the coverage of news of national scope and significance – that is, those we are particularly interested in. Finally, potential intercoder reliability problems were to a large extent avoided as we checked every single event in our data set and corrected for possible coding errors or variations from one coder to the other.

Legitimacy and access to the national public space

We derive a number of specific hypotheses about the forms and content of claims by immigrants and ethnic minorities in France and Switzerland from the institutional and cultural settings described above. First, and on the more

general level, models of citizenship determine the degree of access to for minorities to the national public space. The various conceptions of citizenship determine the status of migrants in a given national space and hence the degree of *legitimacy* for political participation. The collective definition of 'citizenship' – and more generally of the patterns of inclusion in and exclusion from the national community – influences the degree to which they feel as though they belong to that community and hence legitimized to intervene in the national public space. The prevailing use of such labels as '*immigrés*' ('immigrants') in France and '*Ausländer*' ('foreigners') in Switzerland are the discursive reflection of such varying sense of belonging and legitimacy (Kastoryano 1996; similarly, the British and Dutch civic-pluralist model yields such prevailing labels as 'ethnic' or 'racial' minorities and '*etnische minderheden*').

Different ways of labeling migrants can also be seen in the existing legislation: while in France one speaks of 'immigration law', the main legal framework in Switzerland is the 'Law on the Establishment and Sojourn of Foreigners'. Similarly, the institutional bodies in charge of the migrant issues have different names: for example, the French 'State Secretary for Immigrants' and 'National Commission for the Housing of Immigrants' contrast with the Swiss 'Federal Office of Foreigners' and 'Federal Commission of Foreigners'. We hypothesize that migrants come to share this perception of their status in the host society. For example, in a country where an ethnic-assimilationist model of incorporation prevails, migrants should address claims primarily to their homeland rather than to their host country, because they do not feel as belonging fully to the national community in which they live. Concerning the general thematic focus of claims, we therefore expect France's civic-based model to facilitate the presence of migrants in the national public debates and encourage them to make claims about their situation in the host society. On the other hand, the Swiss ethnic-based model should produce a stronger emphasis on homeland issues – that is, issues pertaining to one's country of origin.

Table 3 shows the distribution of claims in France and Switzerland according to the nationality of migrants. This gives us an idea of which ethnic groups have intervened in the public space during the period under study. We can make three remarks with regard to this aspect of claim-making. First, different groups of migrants have mobilized in the two countries. While in France, immigrants from North Africa (mostly Algerians, Moroccans and Tunisians) and minorities from the Jewish community have mobilized the most among those groups for which the nationality or the ethnicity was specified, in Switzerland it was Turks and Kurds, as well as by people from former Yugoslavia. Second, the distribution of claims by nationality or ethnicity does

Table 3. Distribution of claims by immigrants and ethnic minorities by nationality/ethnicity, 1990–1998 percentages

Nationality/ethnicity	
	<i>France</i>
Maghrebian, North African	22.3
Jewish	18.7
Other African	4.2
Turkish, Kurdish	3.0
Other nationality/ethnicity	2.5
Country of residence/nationality	7.2
No specification of nationality/ethnicity	42.0
Total	99.9*
N	471
	<i>Switzerland</i>
Turkish, Kurdish	32.6
(Former) Yugoslavian	17.1
Jewish	7.2
Tibetan	4.9
Albanian	4.2
Tamil	4.2
Italian	2.7
Other nationality/ethnicity	6.4
Country of residence/nationality	10.2
No specification of nationality/ethnicity	11.0
Total	100.5*
N	264

Note: Includes both verbal and non-verbal claims.

*Do not add to 100 due to rounding percentage.

not necessarily reflect the structure of migrant populations in the two countries. This holds true particularly for Switzerland. For example, as we have seen earlier, Italians are the largest ethnic group in Switzerland, but their mobilization is very weak. On the other hand, Turks and Kurds are largely over-represented in the public space, if we compare them to the size of their communities in the country. This difference between the size of ethnic groups and their mobilization clearly suggests that political opportunities vary across ethnic groups. Thus, the weak level of mobilization by Italians might be due to the fact that more institutional channels are open to them as they arrived at an early period and are now to a large extent settled and better integrated in the country than other nationalities such as Turks and Kurds. Furthermore, as we will see below, the latter mobilize to a large extent with respect to their homeland, partly because there is a salient conflict there, but also because they

lack institutional and cultural opportunities in the host society. Third, the share of claims by migrants without the specification of nationality or ethnicity is much larger in France. This is in line with the prediction that can be derived from the models of citizenship. For, while the Swiss model is rather exclusive and defines migrants largely along ethnic lines, the French model is more inclusive and the civic-based conception of citizenship it conveys discourages self-presentation as a specific national or ethnic group.

Although we have seen which ethnic groups are more active in claim-making, we still do not know anything about the extent of the presence of migrants in the national public space. Table 4 shows that in Switzerland the participation of migrants in the field of immigration and ethnic relations is quite limited. Minority actors were involved only in 6 per cent of all the speech acts and collective mobilizations related to this policy field between 1990 and 1998. They are more present in France, where just below 13 per cent of claims were made by migrants. However, their overall presence in the public space is found to be rather low in both countries. If we confront these results with comparable evidence from Britain, where about one-fifth of the claims come from minorities (Koopmans & Statham 1999b: 684), we see that France lies between Switzerland and Britain. This shows that there is indeed a relationship between models of citizenship and the opportunities available to migrants to intervene in the national public space. Specifically, these findings confirm the hypothesis that the civic-pluralist model provides the most opportunities, followed by the civic-assimilationist model, and then by the ethnic-assimilationist model. The fact that Germany, with about 7 per cent of the claims in this field made by minority actors, is close to Switzerland (Koopmans & Statham 1999b: 684) further confirms our hypothesis as these two countries share a similar model of citizenship.

Table 4. Overall presence of immigrants and ethnic minorities in the public space in France and Switzerland, 1990–1998

	All claims		Immigration and ethnic relations field	
	France	Switzerland	France	Switzerland
Minority actors involved	10.7	12.6	12.6	6.0
Other actors involved	89.3	87.4	87.4	94.0
Total	100.0	100.0	100.0	100.0
N	4,385	2,092	3,320	1,695

Note: Includes both verbal and non-verbal claims.

Although nearly one-fifth of its population is of foreign origin, Switzerland neither legitimates them as political actors nor offers them viable opportunities for making claims pertaining to their situation in the host society. To be sure, foreigners in Switzerland do mobilize, yet they do so largely to address their grievances relating to their homeland. As we can see in the second column of Table 4, if we also take into account issues outside the immigration and ethnic relations field, the overall presence in the public space by minority actors increases and becomes even stronger than in France. However, the distribution of claims according to their general orientation (shown in Table 5) indicates that about 60 per cent of their claims refer to homeland politics and not to the host country's political agenda. By contrast, less than 10 per cent of claims in France deal with homeland politics. Since they are weakly integrated into the host society, migrants in Switzerland tend to keep strong ties with their country of origin. They have long been considered, and are in part still considered, to be temporary guest-workers who will one day return to their country and therefore do not need to be integrated, as the lack of a coherent integration policy attests. The lack of integration and feeling of belonging to the national community in the country of residence encourages them to maintain the links with their homeland and to mobilize on issues related to it, rather than issues pertaining to their situation in the host society. Alternatively, although a large part of France's migrant populations come from countries with dramatic internal conflicts such as Algeria and to a lesser extent Turkey that would fully justify their involvement in their homeland's affairs, only a small part of their claims are addressed to their country of origin. The way in which they are incorporated into the French national community leads them to be more active politically in France and to participate to a larger extent than their Swiss counterparts in French political life. Migrants in France are not considered guest-workers, unlike in Switzerland and Germany for example, but rather as people living permanently or at least

Table 5. Claims by immigrants and ethnic minorities in France and Switzerland by general orientation, 1990–1998 percentage

	France	Switzerland
Politics of host country	91.1	39.4
Homeland politics	8.9	60.6
Total	100.0	100.0
N	471	264

Note: Includes both verbal and non-verbal claims.

for a long period in the country and thus having more legitimacy to participate in public debates.

In sum, the presence of ethnic minorities in the public space is largely constrained by national models of citizenship that define to a large extent the legitimacy of minority groups to participate in public debates and determine the access for their intervention in the national public space. The collective attribution of the status of migrants in the host society influences both the distribution of cultural resources and the space for their political participation.

Migrant participation in the field of ethnic relations, citizenship and immigration

Turning to the forms and content of claims made by migrants within the field of ethnic relations, citizenship and immigration in the host society, a first hypothesis concerns action repertoires. Following Kriesi et al.'s (1995) account of the strategic choices made by challengers, immigrants and ethnic minorities, we may expect that they, like all other collective actors, make use of radical forms of action in a closed general structural setting like that of France and more moderate forms in an open setting like that of Switzerland. Based on the models of citizenship approach, however, the expectations go in the opposite direction. The civic-based conception of citizenship in France offers a more favorable setting for the mobilization of immigrants and ethnic minorities than the ethnic-based conception in Switzerland. Thus, we would expect the action repertoire of migrants to be determined both by the institutional opportunity structures and by the specific opportunities deriving from the national models of citizenship. Since institutional opportunities are closed and cultural opportunities rather open in France, and the opposite holds in Switzerland, we should observe similar action repertoires of migrants in the two countries.

The distribution of collective mobilization by form of action (shown in Table 6) provides evidence confirming this hypothesis.⁷ The action repertoire of migrants is somewhat more radical in France. In particular, they make more use of confrontational actions. Yet the share of violent actions does not differ substantially in the two countries. Lacking an easy institutional access, if they want to be heard in a context characterized by closed opportunity structures, migrants must act – as any other protest group – with some degree of radicalness.

Of course, since we have opposing expectations from two theoretical perspectives (institutional and cultural opportunities), the binary comparison here is especially tricky. However, if we compare these findings with the dis-

Table 6. Claims by immigrants and ethnic minorities in France and Switzerland by form of action, 1990–1998 (immigration and ethnic relations field)

	France	Switzerland
Verbal claims	30.5	43.6
Conventional actions	18.3	12.0
Demonstrative actions	18.6	27.7
Confrontational actions	26.7	12.9
Violent actions	5.5	4.0
Total	99.0*	100.2*
N	419	101

*Percentages do not add up to 100 due to rounding.

tribution of forms of protest events in general, we can see how the opportunities deriving from the national models of citizenship have a moderating effect in France and a radicalizing effect in Switzerland. For example, Kriesi et al. (1992: Table 2) have shown that, during the period from 1975 to 1989, the new social movements were responsible for 18 per cent of all protest events in France and only 4 per cent in Switzerland. This difference is even stronger for other movements, as they were responsible for 31 per cent of all protest events in France and only 6 per cent in Switzerland. Therefore, models of citizenship indeed seem to play an important role in explaining the action repertoires of immigrants and ethnic minorities, specifically by counteracting the effect of the political-institutional context of contention.

While traditional political opportunity theories go a long way toward explaining the action repertoires of social movements, they have little to say about the content of claims. We argue that by taking into account the cultural side of opportunities, we can provide a better explanation of the thematic focus of claims by immigrants and ethnic minorities. Specifically, when migrants address their claims to the host country, we expect them to focus on their integration in the host society (minority integration politics) in France and to deal primarily with the regulation of immigration flows (the right to entry and stay in the country) in Switzerland. Since the ethnic-assimilationist model of citizenship produces a situation in which migrants have a fragile and unstable status, on the rare occasions they act within the national public space, we expect them to focus on the fragility of their status in the host society. In a country with a civic-assimilationist model of citizenship like France, migrants should deal primarily with their integration into the host society rather than with their entry and stay in the country. Since they are to some extent accepted as part of the national community and often have citizen status, they can focus

on issues concerning their membership of the French community, specifically on the recognition of their rights *vis-à-vis* the national majority. By contrast, Switzerland's ethnic-assimilationist model of citizenship, which is rather exclusionary with respect to immigrants and ethnic minorities, yields few opportunities for claims regarding minority integration politics. As a consequence, in such a context we should observe a small proportion of claims in this issue field and a higher share of claims in immigration and asylum policy.

Table 7 (which shows the distribution of claims by thematic focus within the immigration and ethnic relations field) allows us to confront with our data the hypothesis that, due to the difference in the prevailing models of citizenship, migrants tend to focus on minority integration politics in France and on the regulation of immigration flows in Switzerland. The results go in the expected direction, but only in part. On the one hand, if we look at the general

Table 7. Claims by immigrants and ethnic minorities in France and Switzerland by thematic focus, 1990–1998 (immigration and ethnic relations field)

	France	Switzerland
<i>Immigration and asylum policy</i>	32.6	32.6
Immigration and asylum policy general	0.6	2.1
Entry and border control	1.8	6.3
Registration and internal control	1.0	1.1
Recognition of residence rights	23.0	–
Expulsions	5.2	20.8
Voluntary return	1.0	1.0
<i>Minority integration politics</i>	42.2	26.3
Minority integration general	4.0	8.4
Minority rights and participation general	0.5	–
Naturalization and citizenship	0.3	–
Political rights and participation	1.6	1.1
Social rights and participation	4.9	9.5
Cultural rights and participation	17.3	5.4
Discrimination and unequal treatment	4.4	2.1
Minority social problems	2.6	–
Inter-ethnic, inter- and intra-organizational relations	6.8	–
<i>Anti-racism</i>	25.1	41.1
Racism in institutional contexts	1.3	1.1
Non-institutional racism and extreme-right tendencies in society	23.8	40.0
Total	99.9*	100.0
N	383	95

Note: Excludes non-verbal claims.

*Percentages do not add up to 100 due to rounding.

thematic focus, minority integration politics covers more than 40 per cent of claims in France and only about 25 per cent in Switzerland. The civic-assimilationist model of citizenship thus seems indeed to encourage migrants to deal primarily with their integration in the host society. On the other hand, however, the proportion of claims in immigration and asylum policy is the same in the two countries, which goes counter to our hypothesis that the Swiss ethnic-assimilationist model of citizenship provides more opportunities to make claims concerning the right of entry and stay in the country. As we can see by looking at the more specific categories, the large majority of these claims in France concern the recognition of residence rights and, in particular, the issue of *sans-papiers* (undocumented aliens) who have strongly mobilized in the second half of the 1990s to ask for a regularization of their status. In Switzerland, on the other hand, migrants have mobilized mostly to protest against expulsions.

The thematic focus of claims, however, is in part subject to change over time. If we look at the distribution of claims in time (results not shown), we can see that in France in the early 1990s migrant mobilization was addressed primarily to minority integration issues. In the more recent period, issues pertaining to immigration and asylum policy (above all the recognition of residence rights of *sans-papiers*) have significantly increased, although overall they remain less frequent than claims concerning minority integration politics. By contrast, migrants in Switzerland have shifted the main focus of their claims from the regulation of flows to their situation in the host society.⁸ These shifts over time suggest that our argument regarding the impact of models of citizenship on claim-making by immigrants and ethnic minorities is stronger with respect to the distinction between politics of the host society and homeland politics than to the thematic focus within the field of immigration and ethnic relations. More generally, these shifts show that the relationship between models of citizenship and claim-making by immigrants and ethnic minorities may change due to specific events that open up new opportunities for mobilization. Among these events, government policies certainly play a major role. For example, if the strong stance of the French Minister of Education in the early 1990s against the wearing of the Islamic headscarf in public schools gave rise to a wealth of claims over minority integration politics, the Pasqua Law of 1993 and also the Chevènement *Circulaire* of 1997 aggravated the situation of migrants with respect to their residence rights and status. This led the thematic focus of claims to shift from minority integration politics (which nevertheless remains dominant) to immigration and asylum policy.

Table 7 also allows us to confront our data with further, more speculative, hypotheses on the content of claims. We may hypothesize that, in the French

context, ethnic minorities emphasize their collective identities in their claim-making since France's civic-assimilationist model of citizenship largely denies the recognition of ethnic difference in favor of a civic allegiance to the republican values (e.g., Birnbaum 1998; Brubaker 1992; Leca 1992; Schnapper 1991). Given the inclusive character of its formal criteria and its stress on cultural assimilation, this model of citizenship creates a tension between the strong cultural obligations required for incorporation into the host society and the willingness of ethnic minorities to be assimilated. As a consequence, we should observe a high proportion of claims seeking recognition of difference on the part of minority groups, such as Muslims, whose collective identity is endangered by the cultural requirements for assimilation. We expect migrants to react to such demanding cultural requirements and mobilize primarily on issues of cultural diversity and the recognition of ethnic difference.

The findings suggest that this is indeed the case. The proportion of claims addressing cultural rights and participation in France is more than three times higher than in Switzerland. More than a half of these claims are related to religion (results not shown), as was the conflict over the Islamic headscarf. The principles of equality and of universal rights fostered by the French Revolution imply the denial of particularism and claims for the recognition of ethnic difference and cultural diversity. However, as Young (1990) has pointed out, cultural rights are inherent in individual personality, and it is often psychologically difficult and socially quite destructive to have to downplay ethnic differences. Migrants in France face a situation in which they are asked to avoid expressing cultural diversity in the name of respect for French republicanism, and it appears that they try to redress this situation by asking the authorities (and more generally French society) to remove such constraints from their everyday life.

Assimilationist pressures exist in Switzerland as well. However, the ethnic-based conception of citizenship paradoxically diminishes their impact on the collective identities of migrants. Since the difference between citizens and aliens is defined along ethnic lines, the need to claim for the recognition of cultural diversity is less urgent than in a civic-based context such as that of France. The fundamental cleavage in Switzerland is not that between ethnic, cultural or religious identities and the national, republican values, but rather between the full social citizenship of nationals and the partial citizenship of most migrants, who are often denied some of the rights to which nationals are entitled. Whereas in France the fundamental conflict concerns the lack of cultural recognition, in Switzerland it concerns the lack of social recognition. As a result, when migrants address minority integration politics in Switzerland they more often (about 10 per cent of all claims) ask for social and participa-

tion rights that facilitate their living conditions in areas such as education, health care, social security, and so forth (although the numbers here are smaller and need to be treated with caution). Thus, demands that may improve their living conditions – social rights and participation – become central as regards minority integration politics. As any other claim relating to the situation of migrants in the host society, however, such demands remain marginal compared to homeland politics issues.

Conclusion

A growing number of studies have stressed the importance of prevailing definitions of ‘citizenship’ and ‘regimes’ for the incorporation of migrants in explaining cross-national variation in the relations between national majorities and ethnic minorities of migrant origin (e.g., Birnbaum 1998; Brubaker 1992; Kastoryano 1996; Leca 1992; Schnapper 1991). Others have tried to establish a link between such longstanding cultural traditions and the formulation and outcomes of migration policies – in particular, policies regarding access to citizenship (e.g., Freeman 1995; Hollifield 1992; Joppke 1999; Safran 1997). Our aim in this article is to contribute to the still sparse but growing literature on collective mobilization and political claim-making by immigrants and ethnic minorities (e.g., Blatt 1995; Fibbi & Bolzmann 1991; Ireland 1994; Koopmans & Statham 1999b; Soysal 1997). We have conceptualized models of citizenship as the cultural setting that determines the political opportunities available for the intervention of migrants in the national public space and affect the content of their claims. In our view, models of citizenship can specify the ‘classical’ political opportunity structure (or at least important parts of it) for a specific substantive field of interest – in our case, the field of ethnic relations, citizenship and immigration. Models of citizenship affect, on the one hand, the legitimacy of these groups to take part in national public debates and hence their overall presence in the national public space. On the other hand, they define the legitimacy of migrants to intervene on the basis of their ethnic identities and shape the content of their claims.

Our empirical evidence on claim-making by immigrants and ethnic minorities in France and Switzerland has to a large extent confirmed our hypotheses. First, concerning the access to the national public space, migrants have mobilized around issues related to their situation in the host country more often in France than in Switzerland, where they have focused primarily on homeland issues. Second, we have observed variations in the thematic focus of claims within the field of ethnic relations, citizenship and immigration. On

a general level, minority integration politics is a more important issue field in France than in Switzerland, although migrants have often made claims in immigration and asylum policy in both countries and we observe important fluctuations over time. These fluctuations lead us to nuance somewhat the impact of models of citizenship on the content of claims.

Immigrants and ethnic minorities have often focused on cultural rights and participation in France, whereas in Switzerland we observe a larger share of claims on social rights and participation. Finally, we were able to show that the prevailing model of citizenship counteracts the closed institutional opportunity structure in France and the openness of the political-institutional context, resulting in rather similar action repertoires of migrants in the two countries.

Our article brings evidence about claim-making by immigrants and ethnic minorities to bear upon an important theoretical discussion in the literature on contentious politics. Following recent calls for more careful attention to cultural variables in the study of social movements (Gamson 1992; Johnston & Klandermans 1995; Morris & McClurg Mueller 1992; Melucci 1996; Snow et al. 1986), we stressed the impact of the cultural context on migrants' claims in France and Switzerland. Much, if not most, work on social movements during the last two decades has focused upon institutional opportunities. This has strengthened our knowledge of the structural conditions under which social protest emerges and develops over time. However, demands and institutions are culturally informed packages. Political claim-making is culturally embedded. Political opportunity theorists, apart from a few significant exceptions (e.g., Diani 1996; Gamson & Meyer 1996; Koopmans & Statham 1999a, 2000), have largely overlooked the impact of cultural variables. We think that this is one of the reasons why the political process approach to social movements has been strong in explaining the rise and fall of protest, its extent and action repertoires, but has often remained silent as to its content. This gap clearly limits the explanatory power of this approach. As we have tried to show, once we bring cultural factors back into our explanations, we are in a better position to account for variations across countries, as well as over time, in the general and specific content of contentious politics.

We further think that cultural variables can also help to explain the emergence and extent of protest insofar as they set the preconditions for challengers to enter the public space. Our study indicates that the prevailing models of citizenship determine the legitimacy of migrants for participating in national public debates. Together with the impact on the content of claims, this leads to the conclusion that we should pay much more attention to cultural variables in the study of contentious politics. However, we should not throw

the baby out with the bath water. Political institutions do matter. In a way, we are attempting to combine institutional and cultural explanations of claim-making. If models of citizenship allow us to understand the overall presence of immigrants and ethnic minorities in the national public space and the content of their claims, political-institutional variables remain crucial in accounting for variations in the form of their actions as they largely define access to the political system. Yet the cultural setting determines the extent to which political institutions provide real opportunities for their mobilization.

The Swiss political system offers social movements a favorable setting for mobilizing insofar as it provides multiple points of access to the political arenas due to the combination of open institutional structures and inclusive prevailing strategies of the authorities (Kriesi et al. 1995). However, ethnic minorities cannot fully take advantage of such opportunities as they are not legitimate actors in the political process. As a result, they also lack strong political alliances, which have been shown to represent a crucial resource for challengers (Della Porta & Rucht 1995; Kriesi et al. 1995; Tarrow 1998). Although in a different way, the difficulty immigrants in France face in intervening in the national public space on the basis of their ethnic identities also reduces political opportunities for claim-making. In addition, migrant organizations in France encounter important barriers to entry into political arenas and especially to remaining active in them (Blatt 1995; Ireland 1994; Witholde Wenden 1988). All this points to the need to specify the political opportunity structures for a given policy area. We have tried to do so by showing how models of citizenship shape the nature of claims made by minorities of migrant origin in France and Switzerland. A similar approach could be applied to other issues as well and provide new insights into how specific opportunity structures shape the form and content of political claims in different policy fields.

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Notes

1. The relative shares of these three nationalities have changed substantially since the early 1960s. In 1962, for example, Italians represented 29.0 per cent of the total foreign population, Spaniards 10.4 per cent and Portuguese, whose massive arrival is more recent, only 2.3 per cent (Ireland 1994: 13). The share of these three nationalities in 1990 (i.e., at the beginning of the period studied here) was 7.0, 6.0 and 18.1 per cent, respectively (Taïeb 1998). The proportion of the three groups from the Maghreb has also changed, but to a lesser extent. In 1962, the share of Algerians was 16.2 per cent, while Moroccans and Tunisian formed only 1.5 and 1.2 per cent, respectively, of the foreign population (Ireland 1994: 13). In 1990, the share of these three nationalities was 17.1, 15.9 and 5.7 per cent, respectively (Taïeb 1998).
2. In Switzerland, like France, the relative share of nationalities has changed over time. For example, in 1960, Italians represented 59.1 per cent of the total foreign population, Spaniards 2.4 per cent and Yugoslavs 0.2 per cent (Ireland 1994: 14). In 1991, the share of these three nationalities was 31.9, 9.7 and 14.5 per cent, respectively (Ireland 1994: 14).
3. The juxtaposition of 'ethnic' and 'assimilationist' might appear as an oxymoron, since an ethnic-based model excludes minorities from the national community, while assimilation has an inclusive meaning. However, no nation is purely ethnic, at least among Western democracies. Even if migrants are barely incorporated into the national community in countries like Germany and Switzerland, the state must regulate relations between them and the national majority. There are two main options to do this: assimilation (i.e., adaptation to the national culture) or pluralism (i.e., recognition of difference). In other words, the collective definition of 'citizenship' and the cultural obligations posed on migrants are two independent dimensions.
4. We thank Charles Tilly for having brought this example to our attention.
5. The concept of 'models of citizenship' shares some resemblance with that of 'policy paradigm' (Hall 1993) and '*référéntiel*' (Jobert & Muller 1987). However, we prefer to use the term 'model' not only to be consistent with the existing literature on migration, but above all because both the concepts of 'policy paradigm' and '*référéntiel*' have been used in a narrower sense with regard to public policy to refer to the set of beliefs, norms and images that characterize policy-makers and instruments.
6. It is the MERCI project ('Mobilization on Ethnic Relations, Citizenship and Immigration'), which includes five West European countries: Germany and Britain (study conducted by Ruud Koopmans at the Wissenschaftszentrum Berlin für Sozialforschung and Paul Statham at the University of Leeds), France and Switzerland (Marco Giugni at the University of Geneva and Florence Passy at the University of Lausanne) and the Netherlands (Thom Duyvené de Wit at the University of Amsterdam).
7. It should also be remarked that immigrant mobilization in Switzerland is much more radical if we include claims not pertaining to the field of immigration and ethnic relations. To do so, however, would in a way bias the analysis. Collective mobilizations concerning homeland politics are not directly influenced by the Swiss political opportunity structure as they address the country of origin rather than the host society. As such, they depend more on the specific conflict or situation in the homeland. At the same time, this demonstrates that the civic-based conception of citizenship in France, as compared to the ethnic-based conception in Switzerland, has a moderating effect on the action repertoire of immigrants and ethnic minorities.

8. In both cases, the shift is very important. For example, if we divide the period under consideration in two halves (1990–1993 and 1994–1998), claims concerning immigration and asylum policy have increased from 19 to 43 per cent in France, while they have diminished from 49 to 22 per cent in Switzerland. At the same time, claims concerning minority integration politics have gone from 58 to 33 per cent in France and from 24 to 32 per cent in Switzerland. All these figures refer to verbal claims only, but the proportions for all claims do not differ much.

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