
MULTICULTURALISM IN NATION-STATES AND IN CONSOCIATIONS: A COMPARATIVE PERSPECTIVE

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Abstract

Starting from the typology proposed by Michael Walzer in which this author distinguishes between Nation-States and Consociations, this article will analyse two different kinds of politics of recognition of ethno-cultural diversity. It will endeavor to show that despite their considerably disparate historical experiences, practically all the diverse types of governance of cultural diversity in a globalized world have a wide range of problems in regards to a decent recognition of ethno-cultural and linguistic diversity. The comparison between classic Nation-States (like the French and German type) and Consociations (like Switzerland, Canada, Belgium and last but not least Malaysia) intends to highlight in particular that the political agenda (rather liberal-oriented) cannot be exported to *plural societies* just as the political agenda of *plural societies* (rather communitarian- and consociational-oriented) cannot be transposed *tout court* into other societies. The analysis of the different politics of ethno-cultural diversity based on empirical data and the method of comparison by contrast (thus not comparison by affinity), which also challenges the soundness of simplistic universalist models of interpretation.

Key words: *Nation-States, Consociation, Cultural Diversity, Politics of Recognition, Multiculturalism, Ethnicity, Plural Societies, Malaysia, Germany, France*

Introduction: Regimes of Toleration and Politics of Recognition

In tackling the question of the recognition of ethno-cultural diversity, Michael Walzer put forth an important distinction between tolerance as a political-philosophical principle that can be expressed in avowals, attitudes, stances or social representations of an ideal or indeed abstract nature and the actual performance of tolerance

as a concrete social practice grounded in peaceful coexistence, even if barely agreeable, among human groups with different histories, cultures and identities, thus in most cases with different religions and idioms (Walzer, 1997). This chapter will deal especially with this second form of essentially practiced tolerance that Walzer calls toleration.

In this article we will analyse different *regimes of toleration*. Therefore, we chose two types expressly mentioned by Walzer that are currently significant in modernity's complex societies, i.e. the *Nation-States*, highly prevalent in Europe, and the *consociations*, exceptionally present in Europe (for example in Switzerland and Belgium) but more widespread in various postcolonial African States (Ghana, and South Africa for example) and particularly in southeast Asia (for example Indonesia, Malaysia). To the *Nation-States* and *consociations* we also added *immigration societies* (such as Canada), since socially and politically they ultimately appear to be very similar to the first two. In essence, over the last sixty years classic *Nation-States* and traditional *consociations*, especially in old Europe, have slowly acquired some of the characteristics of *immigration societies*. Through the analysis of specific cases, this choice allows us to show empirically that the *politics of recognition* (Taylor 1992) of ethnic and cultural diversity, on which every *regime of toleration* is founded, is not an effortless, self-evident or trouble-free process. Indeed, the diverse *politics of recognition* and distinct *regimes of toleration* in both *Nation-States* and *consociations* are characterized precisely by tensions, dissent, exclusions, discriminations and at times conflicts, yet also by negotiations, talks and concessions.

This presentation is marked specifically by this disenchanting anthropological vision that aims to corroborate Walzer's philosophical pragmatism through the analysis of two specific forms of political community mentioned in the previous paragraph, which are the most widespread types in the present-day world, where the *regime of toleration* and the *politics of recognition* in terms of linguistic diversity are particularly important yet also controversial.

Nation-States as mono-ethnic territories

In this section we will analyse the *regime of toleration* and the *politics of recognition* in the European continent starting from the observation that Nation-States, despite being a global phenomenon, have undisputable European origins.

Europe's current political layout is still based in the main on Nation-States being fiercely protective of their sovereignty, though the latter has been slightly limited lately by regionalist and autonomy demands. This political layout is the outcome of the proliferation of such States at the end of the 18th century and thereafter and of the project to establish a *Europe of nations* in the aftermath of World War I.

Nation-States were established mainly by means of two models first conceived in France and in Germany (Brubaker 1992).

The French model

It has often been remarked that the French model of national State is based on the idea of *political nation*. According to this widespread opinion, the national State would be the outcome of a *political agreement* or, better yet, of a *pact*, i.e. a *contract* between its citizens. The *political nation* of French derivation is an elective community, implying the existence of a *patrie ouverte* in which religious and/or ethnic-related differences are irrelevant (Dumont 1991: 25). Under this aspect, the national State represents the outcome of a declaredly voluntary act of each citizen.

Nowadays we are aware that the non-ethnic concept of nation that stemmed from the French Revolution was markedly modified and relativized rather soon, since it was merged with ideas that were not utterly devoid of ethnicizing tendencies. This fundamental shift occurred together with and was justified by the introduction of ethnicizing concepts by which the prerequisites to belong to the elective nation and its State were increasingly defined by ethno-cultural criteria, such as knowledge of the French language and the acquisition of the way of life specific to the country.

Though weakened, this idea of the French nation was never totally set aside. In particular, the *subjective*, thus individualistic vision of the nation (Sundhausen 1997:79), by which any foreigner living in France can take advantage of the apparently trouble-free mechanism of assimilation to become a citizen, remained unchanged. According to this scenario, any ethno-cultural differences, identities and boundaries are never inescapable and insurmountable. Whether ethnic, cultural or national, for the French model any type of belonging is never definitively set; on the contrary, it can be modified through acculturation processes that lead to integration via the assimilation of those who are not regarded as foreigners. The assimilation process, which clearly entails significant changes in the individual's cultural identity, legitimizes welcoming the *xenos* to the bosom of the community and the national State.

This brief presentation already highlights that the French type of national State is associated with the concept of a more *open* society than other models of political-administrative organization. This fact is further substantiated by the actual, albeit incomplete application of the *jus soli* in the French juridical system.

On the other hand, we ought to bear in mind that the significant *openness* in welcoming foreigners is counterbalanced by the surprisingly weak appreciation for ethno-cultural differences within its own national territory. Minorities in France, i.e. groups within the country that on the strength of real or purported ethno-cultural criteria demand the recognition of their diversity (see Corsica and Brittany for example) are ignored to this day. At best, they represent an awkward though perforce acknowledged reality.

Moreover, the law known as *Loi Pasqua*, which reformed the renowned *code de la nationalité*, one of republican France's juridical institutions, came into force on January 1, 1993. Without delving into its legal technicalities, this law makes ob-

taining nationality more difficult especially for immigrants. Consequently, there is a creeping ethnicization that puts present-day France increasingly in contrast with the revolutionary ideal of *political nation*. We can rightfully wonder whether France is undergoing a Germanization.

The German model

The national state based on the German model is often described as *ethnic*, in this context mainly with a negative connotation. The use of this adjective expresses the fact that the German model of national State is based on genealogy, i.e. on the shared origin of its citizens.

In our opinion, linking the German model with the notion of *Volk*, which not always has an ethnicizing overtone, would be more appropriate from an historical viewpoint.

Undeniably, however, during the 19th century several intellectuals, including renowned politicians, artists, jurists, philosophers, historians and, last but not least, folklorists (*Volkskundler*) increasingly defined the notion of *Volk* in ethnicizing terms. Descent and origin, no longer regarded symbolically but strictly physiologically, became the inherent characteristics of the *Volk*, by then understood to be *my people* (the German one, clearly). Yet, for a long time this ethnicization of the idea of people and nation in Germany would circulate solely in intellectual circles and would not have juridical consequences on the right to citizenship. As pointed up by historian Rudolf von Thadden, a definitive shift towards the institutional birth of a German ethnic nation only took place in 1913 with the introduction of a restrictive variant of the *jus sanguinis* principle in the *Reich's* juridical system (Pierré-Caps 1995: 112; Gosewinkel 2001). Accordingly, what became known as the German model of the national State, determined by the formula *the people as an ethnic entity is the essence of fully entitled citizens*, became a reality only at this time (Grawert 1973:166). Thus, descent and origin become the two fundamental criteria to define who belonged to the nation and who was excluded.

The escalation of nationalism over the next years led to a gradual ethnicization of the German model, which, via National Socialism and its infamous Nuremberg Laws, inevitably led to the racialization of the notion of *Volk* and of the national State. After the abominable aberrations of the Nazi period, post-war Germany, though never a strictly ethnic State, renewed its links with the previous model of national State in which ethnicity overrides culture. To corroborate this last statement we need only mention the notion of citizenship in the Federal Republic at the time of the two Germanys (1945–1990). As constitutionalist Böckenförde aptly noted, the Federal Republic recognized one citizenship only, i.e. the German one, regardless of all the changes that occurred after 1945 with the division of Germany into two separate States (Böckenförde 1968: 424). Before the reunification, therefore,

neither a specific citizenship of the BRD (Federal Republic of Germany) nor one of the DDR (German Democratic Republic) were recognized. Instead, only one German citizenship was juridically considered as such, i.e. the expression of both the unchangeable ethnic unity of the *Volk* and of the continuity of the national State born in 1866.

The power of ethnicity in the German model was noticeable also after the Fall of the Berlin Wall and the country's subsequent reunification, especially by comparing the situation of the *Aussiedler*, re-immigrants of German origin that wished to settle permanently in Germany, to that of immigrants mainly from southern Europe, Turkey and other African and Asian countries. In fact, by virtue of the ethnic notion of *Volk* and of the *jus sanguinis* principle, the *Aussiedler* could acquire German citizenship nearly automatically, i.e. by proving to have had even remote ancestors from Germany in the past centuries. Until the red-green coalition headed by Chancellor Gerhard Schröder passed new laws, nationality was granted solely on the grounds of descent, regardless of potential links to the German culture. The other immigrants, instead, despite their lengthy residency and even their birth in Germany including their acculturation and integration process in German society, still had to go through complex *naturalization* procedures to be granted nationality.

To remedy this paradox, on June 23, 1999 the German parliament led by a red-green majority ratified a new law on nationality that in essence sought to partially de-ethnicize the German model. The reaction of the opposition's centre-left parties (CDU, CSU and FDP) and most of the population was very negative. Yet, despite their initial opposition, the centre-right governments that replaced the red-green coalition did not repeal the law. German citizenship is currently based on the idea of belonging to a cultural collectivity and not a genealogical one. Under this aspect, the German model has been somewhat Gallicized.

French model vs. German model? Differences and similarities

European Nation-States have far too often been regarded as sheer geographical expressions. Though not completely off the mark, this approach is exceedingly reductive since it overlooks the fact that a nation's political-institutional architecture is also and foremost a social organization. In particular, as Rogers Brubaker aptly remarked, it disregards the fact that in the first place the national State is a political association of citizens to which the latter belong owing to specific attributed or acquired shared prerequisites (mainly cultural ones) (Brubaker 1992). Accordingly, not everyone can be fully entitled to belong to a given national State. Clearly enough, this limited openness towards the *foreigner*, i.e. most often the *culturally other*, implies creating institutional mechanisms of social selection to regulate belonging and foreignness. Citizenship and/or nationality are the fundamental instruments to indisputably determine who is fully entitled to belong to a national State

and who is not. Therefore, citizenship and/or nationality are closely linked to practices of inclusion and exclusion.

If we focus on the practices of inclusion and exclusion towards the culturally different, we can observe an essential analogy, despite obvious dissimilarities, between the French and the German model with reference to the recognition of ethno-cultural diversity.

Through the *subjective* and *individualistic* vision of belonging buttressed by the *jus soli* principle, the French version of the national State is grounded in the principle that a person's otherness may and ultimately should be wiped out. Once assimilation has occurred and been substantiated, the former alien is granted political citizenship, thus is welcomed into the national community. The German version of the national State, with its *objective*, *naturalizing* and *collective* concept of difference strengthened by the *jus sanguinis* doctrine, inevitably and unchangeably determines the alien's belonging to an ethno-national group that is clearly dissimilar to the *Volk's* one. The alien is in principle denied the chance to obtain nationality, thus to become a full-fledged member of the German political community.

Yet, these apparently very dissimilar terms of exclusion and inclusion actually pursue the same goal, i.e. establishing, maintaining or at best restoring cultural and ethnic homogeneity on the entire national territory. In fact, a national State's territory that is not mono-cultural or mono-ethnic is perceived as an *anomaly* that needs to be modified somehow, if not indeed eradicated. For this reason, ever since their advent both the French and the German model have revealed a considerable incompatibility with pluriethnicity and multiculturalism, along with serious troubles in managing either one. This emerges very clearly in the problematic stance towards minorities and immigrants to whom the national State offers the alternative between assimilation and the supposed resulting passage from one identity to another (as in the French model), and the more or less permanent marginalization from the civic and political community (as in the German model).

The propensity for territorial homogeneity common to both in their own Nation-States stems from the fact that the prime movers of both models drew on the *Staatsnation* doctrine, a term much in use in the Germanic area, which, strangely enough, is of French origin (Pierré-Caps 1995). In this context, we need to highlight that this principle is based on the incisive formula *one nation, one State, one territory*. If the two models of Nation-States just described adhere to the above-mentioned postulate, then clearly the logical corollary is the achievement of ethno-cultural homogeneity in their territory.

Language: a symbol of identity and national unity

In Europe's Nation-States, both in the long-established ones but especially in the ones that emerged after the collapse of the Soviet Union and Yugoslavia, the national language has become a symbol of identity, cohesion and ultimately national unity.

In these cases, religion remains undoubtedly relevant in terms of identity and national building but is still secondary to language.

We ought to bear in mind that the concept of nation is a product of 18th century enlightenment, thus it always has a more or less secular connotation. This is especially true of Euro-American Nation-States rather than those in other continents where the influence of western secularization processes was slighter or nil. We need only mention the classic case of Thailand where language and Buddhism are equally important pillars in the national community's collective imagination (Kosonen, Persson 2014: 200–231).

Consequently, it stands to logic that the issue of national language as a symbol of the country and society's unity is crucially important in most of today's Nation-States. In national education policies, teaching in the language of the community regarded as the titular nation becomes central. Knowledge of the national language also becomes a means to appropriate national culture because it is the foundation of social cohesion within a given Nation-State.

Yet, as mentioned above, Nation-States, with few exceptions such as Portugal and Iceland for example, were not and to this day are not culturally homogeneous political entities. Indeed, cultural as well as ethnic homogeneity is more of an abstraction, an ideal, a goal to be achieved rather than a sociological reality.

The nearly generalized presence of linguistic plurality in a state entity that views itself as homogeneous generates embarrassment and frustration, as mentioned above. If not through attempts or actual processes aimed at eliminating cultural and linguistic diversity via drastic measures, such as a ban on teaching or using a minority idiom, at the very least a hierarchical system between the titular nation's language and the minorities' languages will be established.

This hierarchical order is already noticeable after WWI in the first policies of recognition of linguistic diversity within Europe's Nation-States with the emergence of the question of the *protection of minorities* implemented via the failed *Minderheitenschutz* policy under the aegis of the League of Nations (Horak 1985: 7 ff.). One of the most important points of this policy, which ultimately boiled down to a feeble moral pressure exerted by the League of Nations, was the protection of linguistic minorities. However, the need of protection implies a danger. At the time, in fact, especially in the new Nation-States born of the ashes of multinational empires and echoing the French or German model, linguistic discrimination was systematic and could even reach the point of prohibiting the use of any other language except the titular nation's one. At the time, the predominant stance was what Hungarian historian Istvan Bibó aptly called the *right of supremacy* of the titular nation (Bibó 1993: 172).

Circumstances are rather different nowadays; most Nation-States, at least in Europe, slackened their strings several years ago and the recognition of linguistic diversity is no longer unthinkable, though in France and Germany, i.e. the two Nation-States par excellence, linguistic plurality remains questionable or at the least hardly fashionable.

To this day, however, minority languages are tolerated in Nation-States but nearly never on a par with the titular nation's language. This gives rise to a hierarchical situation in which the titular nation's language takes on a hegemonic role, whereas minority idioms end up being subordinate. This occurs even in Italy, which probably has one of the world's most progressive statutes in terms of the recognition of linguistic minorities. However, Italy's rather unique situation, which concerns all of the country's linguistic minorities (Germans in Alto Adige/South Tyrol, French in Aosta Valley, Slovenes in Friuli-Venezia Giulia, Arbëreshë/Albanians in Sicily and Calabria, Sardinians in Sardinia, Croatians in Marche and Abruzzi, Greeks in Apulia etc.), is chiefly the upshot of the international agreement with Austria on the recognition of German in Alto Adige/South Tyrol, rather than a heartfelt belief in the added value of a rich linguistic diversity.

Finally we need to emphasize that current territorial disputes, such as the one regarding Transylvania that is souring relations between Hungary and Romania, often involve the failed recognition of a minority language. To this day, nearly all the Nation-States born of the ashes of the multinational empires, renowned for their rather lax thus scarcely regulated multilingualism, coerce minority groups, even by resorting to structural and often also physical forms of ethnic violence, to learn and use the language of the new titular nation that recently took control of the territory by military action or thanks to international treaties. Thus, language and its enforcement by the State becomes the paramount symbol of power.

*Consociations: a different way of ensuring a regime of toleration,
politics of recognition and linguistic diversity?*

The Nation-State model of European origin has undeniably spread all over the world. We need only look at the structure of the international community's individual institutions where it is almost a given that they essentially consist of *classic* Nation-States. Yet, as mentioned in the introduction, there are also other empirically observable political associations, which, albeit very dissimilar from the Nation-States, can ensure specific regimes of toleration and politics of recognition in terms of ethnic and linguistic diversity.

We are referring to consociations, which, though far less common worldwide than Nation-States, are both structurally and politically very different from the latter, thus can neither be likened or associated with them. Accordingly, consociations ought to be viewed as political, yet also social alternatives to Nation-States.

What makes a theoretical conceptualization of consociations highly complex is their marked diversity. On analysing the Nation-State type we can notice that despite variations, which we took into account in the previous chapters about Germany and France, one tends to reduce complexity, as Niklas Luhmann would say (Luhmann 1989). Thus, uniformity and institutional rigidity increase through simplification. Consociations, instead, tend to be more adaptive and flexible, thus situational. Clearly this encourages the production of unique arrangements with a structural and institutional specificity.

Yet, given the marked cultural diversity inherent to each consociation, these brief observations already point up that consociations are structurally fragile political communities. Though certainly more fragile than Nation-States, thanks to their flexibility they prove to be more mindful of cultural and linguistic diversity in societies with a more marked multiethnic structure than that of Nation-States. The *regime of toleration* and consequently the *politics of recognition* are far more differentiated.

Bearing in mind the specificities of the individual consociations, thus of their diversity, we will avoid sweeping generalizations and illustrate how consociations envision the *regime of toleration* and the *politics of recognition* through a case study analysis of a paradigmatic example.

Malaysia: a paradigmatic case of consociation

John S. Furnivall coined the term *plural societies* to describe the cultural complexity of some South East Asian societies. Malaysian society, a legacy of British socioeconomic engineering, may still be defined as such after over fifty years from the end of colonial domination. By means of this concept, Furnivall pointed up a crucial aspect of *plural societies*, i.e. their marked cultural diversity. In line with the philosophical tenet of John Stuart Mill, Furnivall upheld that *plural societies* consist of

“two or more elements or social orders which live side by side, yet without mingling, in one political unit” (Furnivall 1944: 446)

Given the lack of shared values and mutual fellow feeling, these societies are unable to develop a satisfactory social cohesion, thus are doomed to live in a constant state of social disorganization and political uncertainty. Furnivall’s gloomy predictions were not much off the mark since some *plural societies* proved to be politically and socially fragile precisely because of their divisions along ethnic lines strengthened by socioeconomic imbalance between the various communities.

Furnivall’s hypothesis, however, is not generalizable since several *plural societies*, such as Mauritius, Trinidad and Tobago, South Africa, Indonesia and last but not least Malaysia proved to be much more stable and cohesive than expected.

The *deadly ethnic riots* thematized by American political scientist Dan Horowitz (Horowitz 1985; Horowitz 2001) occurred solely during a severe crisis, as in Malaysia in the renowned and now distant May of 1969. The disorders between Malay and Chinese at that time have become a sort of negative national myth, i.e. an incident that must never happen again, although at times similar, yet far less disruptive conflicts have occurred between ethnic communities in the recent past and most probably will occur again in the future, since these inter-ethnic tensions are inherent to societies such as the Malaysian one.

Contrary to some stances, I uphold the apparently paradoxical hypothesis that the coexistence of the different ethnic communities that make up Malaysia, especially the Malay, Chinese and Indian communities, was feasible thanks to a veritable cult of difference, thus thanks to the recognition of ethno-cultural diversity. Though not fulfilling everyone's expectations, the consociative *social contract* in force since independence, and subsequently redefined, is based on a prudent, if not indeed a wary variant of the concept of a *Malaysian Malaysia* as opposed to a *Malayan Malaysia*. The latter case would have meant establishing a national State along the lines of European ones with an entitled nation, the Malay, and extranational minorities, namely the Chinese, Indians etc. The former case, instead, worked toward a more open and inclusivist political solution, since, as Bellows aptly points up,

A Malaysian Malaysia means that the nation and the state is not identified with the supremacy of any particular community or race (Bellows 1970: 59).

This citation shows how Malaysia as a consociation differs from classic Nation-States based on the European model since it takes into account the country's poly-ethnic and multicultural structure of society and acknowledges all ethnic groups on the federation's territory at independence as members of the political community with equal rights without drawing a distinction between titular nation and minorities.

The constitution of 1957 represents the core of a consociative-like *identity bargaining* that has created a very specific type of *ethnically differentiated citizenship* (Hefner 2001: 28) grounded in the fundamental distinction between *natives*, i.e. Malays, and the other communities regarded as *indigenous* and *immigrants*, first of all Chinese and Indians. Since the *natives* are economically and professionally the most disadvantaged group, they were granted a special statute concerning economy, education and property rights (especially with respect to land and house ownership) As per articles 89, 152 and 153 of the Constitution, they have specific territories reserved to them, special house purchase deductions, special regulations for commercial licenses and concessions, and quotas in higher education. Immigrants were granted full Malaysian citizenship, as well as specific rights of religious and linguistic expression within a secular State in which Islam however is the State religion.

This institutional compromise, as two experts of this region – Milton J. Esman and Robert W. Hefner – have aptly pointed up, is the outcome of defensive strategies

ascribable to reciprocal fears and mistrust that still characterize Malaysian society's different ethnic communities (Esman 1994: 57 seq.; Hefner 2001: 23).

Which fears troubled the different ethnic communities? The Malays and the other indigenous groups, being *bumiputera*, i.e. *sons of the earth*, thus *natives*, feared that due to their patent socioeconomic inferiority they would be overcome by the Chinese and Indian enterprise and suffer the same miserable plight of the *red Indians in North America*, as some members of their elites stated verbatim (Esman 1994: 53). Chinese and Indians, instead, were concerned about the future of their flourishing economic activities and of their cultural identity in a State with a strong Islamic connotation. The message conveyed by this instrument is that, though culturally different, we are all Malaysians; better yet, we are all Malaysians precisely because we can all cherish our diversity in this country.

Most likely, the doctrine of *national harmony*, i.e. the principle known as *rukun negara*, was invented because of these widespread fears. This ideological construct, though not very conspicuous in social practices, undoubtedly has a strong symbolic significance. It is a way to proclaim *unity in diversity*, though in practice it is a less optimistic *unity in separation*. These inventions, however, are also necessary to legitimize the government's power, which to some extent is what has occurred for the past 50 years.

At this point, we need to add that, in the context of the above constitutional compromise, public life abides by the ethno-religious boundaries. Because of these borders, the *non-bumiputera* have almost tacitly accepted the political pre-eminence of the *bumiputera* community, especially the Malay one, in exchange for their own economic freedom and supremacy. Consequently, Arend Lijphard speaks of *hegemonic consociationalism* with reference to Malaysia (Lijphard 1977:5). However, this asymmetry is far from complete, or speaking about consociativism would be misleading. In fact, the federal government has always been a coalition of the three ethnic parties (plus a few minor parties) denominated National Front (*Nasional Barisan*). From the very start, this coalition has compulsively pursued, better yet striven to stage a spirit of *consensus* (*musyawarah*) that is difficult if not impossible to attain. Moreover, representatives of the *Malaysian Chinese Association* (MCA) and the *Malaysian Indian Congress* (MIC) as a rule serve as cabinet ministers, although representatives of the *United Malays National Organization* (UMNO) always hold the key ministries. Accordingly, the office of Prime Minister is customarily entrusted to a Malay who must, however, be able to play the role of *great mediator* in case of interethnic conflicts that could jeopardize the nation's unity.

We should also bear in mind that Malaysia is an elective monarchy but that becoming king (*Yang Dipertuan Agong*) is the exclusive prerogative of the sultans of only nine states (out of thirteen) of the Federation. Though a purely representative post, it has a strong symbolic value since it signals the political predominance of the Malay over the *non-bumiputera* and the other *bumiputera*.

Over the years, the compromise elaborated by the constitution has proven obsolete and, on several occasions, new forms of negotiated agreements have changed the character of Malaysia's *ethnically differentiated citizenship*. Despite contrasts and permanent tensions among the various communities, a collegial and consensual solution has always been reached. Thus, after the May 13, 1969 *ethnic riots*, a New Economic Policy (NEP) was launched granting further social rights to the Malays whose socioeconomic situation over the twelve years of independence had worsened compared to middle and higher strata that were mainly comprised of non-Malays (Faaland, Parkinson and Saniman 1990: 17 ff.; Gomez 1999: 176 ff.).

In 1991, after a period of sensational and dizzying economic growth, which, apparently at least, somewhat lessened social differences between *bumiputera* and *non-bumiputera*, the coalition government launched the project *Vision 2020*, whose primary goal was to finally establish a *bangsa Malaysia*, i.e. *a united Malaysian nation with a sense of common and shared destiny* (Hng 1998: 118). In political practice, this would have meant establishing a *consensual, community-oriented democracy* (Hng 1998: 118) that would guarantee the existence of a *tolerant society in which Malaysians of all colours and creeds are free to practice and profess their customs, cultures and religious beliefs, and yet feeling that they belong to one nation* (Hng 1998: 119).

Vision 2020 aimed at making the concept of *ethnically differentiated citizenship* more inclusive by means of the notion of *bangsa Malaysia*, which would have brought together the various communities in a single civic body. Through the *pursuit of excellence*, *Vision 2020* endorsed a less ethnic and more meritocratic idea of citizenship. From this point of view, Malaysia drew on Singapore's model of nation based on the combination of two founding myths, i.e. *multiracialism* and *meritocracy* (Hill and Lian 1995: 31–33).

When the current prime minister came to power, the project *Vision 2010* was shelved and substituted with the one denominated *1Malaysia*, which, though endeavouring to distinguish itself from *Vision 2020*, maintains some of its goals, especially the ones related to the creation of a more cohesive national society where ethno-cultural diversity still remains an essential element.

Summing up the above observations, Malaysia will probably continue to be an *ethnically divided society*, i.e. a multiethnic and/or multiracial entity based on consensual separation and socio-cultural inequalities between *natives* and *immigrants*, and between the single ethnic communities. The ongoing tensions and disputes, the permanent negotiations and subsequent compromises and, last but not least, the symbolic and political significance of the cult of diversity with its various stagings, will still be the cornerstones of the complex construction of both national and local social cohesion in this country founded on *unity in separation*.

The process isn't over yet, however, because with its fast-paced economic development Malaysia is rapidly becoming a country of immigration and will have to tackle this phenomenon that makes the country even more ethnically and culturally

diverse. But this new situation is a challenge to the current *regime of toleration* that will need to be addressed in the near future.

After this brief analysis of the Malaysian consociation's political set up, we need to examine its highly variegated multilingualism, which in everyday life is actually far more flexible and less regulated than in the classic Nation-States. In fact, formally *Bahasa Malaysia* is Malaysia's standard official language. Yet, in everyday practice this language's regional and local differences are rather noticeable. Bahasa spoken in Penang and more in general along Peninsular Malaysia's western coast is different from the one of the eastern coast or Borneo territories. Unlike Malaysia, in Indonesia the Bahasa language, which is different from the Malayan Bahasa, was enforced more strictly in schools and became prevalent nearly throughout the country's vast territory thanks to the rigidity of its educational system. With regards to the Chinese, there is a growing number of schools that teach Mandarin, i.e. mainland China's official language, though linguistic practices are much more diversified in everyday life. In fact, the Chinese community is highly diversified in terms of language since in everyday life the Chinese will use one of the five vernaculars of their place of origin, i.e. Hokkien, Cantonese, Hakka, Teochew and Hainanese. Since these five vernacular languages are not alike, the Chinese of the various communities will often resort to English. Indians, too, are not alike linguistically although the majority speaks Tamil, a Dravidian language, whereas some relatively small communities speak Punjabi, which instead is an Indo-Aryan language.

Any foreigner arriving in a Malaysian city will immediately notice the country's linguistic diversity thanks to the many writing systems used in everyday life. In fact, there are four principal writing systems: the Jawi alphabet of Arab origin, the Latin alphabet for Bahasa Malaysia, Chinese ideograms, and characters of Sanskrit origin for the languages spoken by the Indian community.

At the end of the day, ever since independence Malaysian governments have been unable, or probably never wanted, to impose a linguistic uniformity due to the ethno-cultural complexity of the country. Yet, in practice their remarkable *toleration* has been outstanding, though to a Western observer, especially if from one of Europe's classic and ostensibly monolingual Nation-States, this may seem disconcerting. In fact, in everyday life one hears a constant *switching* from one language to another or English, the one true lingua franca, interspersed with multilingual phrases, whereas Bahasa, despite being the official and bureaucratic-administrative language, remains a rather abstract entity.

Conclusions: Nation-States and Consociations: two incomplete and imperfect types of political communities

Our analysis reveals that the Nation-States tend to lessen cultural diversity, thus also linguistic diversity, by resorting to different strategies, such as a more or less

compulsory assimilation or integration (as in the French model) or exclusion (as in the German model). Therefore, Nation-States have a universalist scope linked to Enlightenment philosophical current and are based on the premise that cultural conformity will create solidarity among its citizens, thus ensuring long-term social and political stability. This, however, entails limiting the *regime of toleration* and consequently curtailing the corresponding *politics of recognition* in terms of cultural and linguistic differences.

As the example of Malaysia shows, consociations are definitely more tolerant, but also more divisive because the various cultural and linguistic communities are not inclined to mingle, thus neither to blend into a single society. This is why Furnivall rightly spoke of *plural societies*, though his diagnosis is too pessimistic as well as ethnocentric because at the back of his mind there were Europe's Nation-States. On the other hand, thanks to negotiation strategies and to the ability to reach often complex and difficult compromises, consociations have been able to ensure a *sui generis* interethnic and intercultural cohesion grounded in the *unity in separation* paradox, as illustrated not only by the case of Malaysia but also, without delving further into the matter, by the case of Switzerland. Consociations show a greater *toleration* to cultural and linguistic diversity, but are also more fragile, as the existence of highly problematic if not failed consociations, such as Belgium, former Yugoslavia and several others, goes to show.

In conclusion, Nation-States are clearly imperfect given their major difficulties in the recognition of ethno-cultural and linguistic diversity, but are also much more stable.

Consociations, instead, are much more mindful and tolerant in their management of the above-mentioned differences, but are also at risk of gruelling secessions and dissolutions. Their survival can be ensured only thanks to complex negotiations and compromises between their various ethno-cultural and linguistic components.

Deciding which of the two most important forms of political community of modernity may be most suitable for the recognition of cultural and linguistic diversity is tantamount to the vain illusion of being able to solve a sphinx's riddle.

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