## Citizenship in Chinese and Global History Before and After the 1890s

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ABSTRACT: Maarten Prak's Citizens without Nations merits praise for what he has added to our understanding of early modern and modern European history. He presents persuasive arguments and evidence for how variations among early modern European cities and their citizens together with subsequent variations among relations between cities and state shaped the modern relations between European national states and their citizens. Prak also extends the concept of citizenship to China and the Ottoman Empire where neither the ideological, nor the institutional features of European citizenship existed by discussing Chinese and Ottoman urban social, economic, and political practices that in early modern Europe relate to citizenship. Such a move makes invisible the early modern ideological and institutional foundations of the Chinese and Ottoman practices he recounts. It additionally creates the problem of determining how, if at all, what he calls Chinese and Ottoman citizenship mattered to nineteenth-century Chinese and Ottoman subjects as they encountered for the first time Western notions of citizenship. In order to write global history, we need more studies of Chinese, Ottoman, and other histories, which explain the changing political architecture of relations between people and those who ruled them to complement what Maarten Prak's fine study of citizens without nations gives us for European history.

Maarten Prak's *Citizens without Nations* exemplifies what methodologically self-aware analysis of historical materials can yield as new insights into old topics. At the same time, this fine book also exhibits traits of an approach to global history and thus to more general issues in social sciences and humanities about how we relate conceptual categories to historical practices that do not strike me as very helpful. I thus intend both to praise the author for what he has added to our understanding of early modern European history and express concern regarding his manner of generalizing from European experiences to global history.

First, the praise. Parts I and II of this book, "Dimensions of Citizenship in European Towns" and "Cities and States, or the Varieties of European Citizenship" each adds fresh new insights into the urban locus of citizenship in European history and then examines the manner in which different relationships between cities and larger territorial states within which they were located influenced the character of citizenship that obtained in each national context. Part I draws on archives for four different towns in order to examine how inhabitants organized a variety of social, economic, and political activities. Citizens were key actors in constructing political and social order, paying for order through taxes, defending it through militia service, and funding its stability through social welfare. Prak weighs in on the long-running discussion that evaluates the role of urban guilds with rich materials showing how guilds were a governance model also for charities, religious confraternities, and civic militias. "Guilds were in many ways the miniature versions of the urban community; ideally, and quite often in reality, their governance model reflected the prescriptions of 'urban republicanism': open recruitment of the governors, rotation of officers, democratic influence of the membership and transparency of the organization's finances". Having produced a multi-dimensional portrait of early modern urban citizens participating actively and consciously creating and coordinating their political, economic, and social activities in a coherent and effective manner, Prak moves on to Part II to offer a new understanding of how the relationships between cities and territorial states varied in different European countries, creating associated differences in the character of national citizenship in each country.

Three chapters are devoted to Renaissance Italy, the Low Countries, and Post-Reformation England and Great Britain. Each presents a different type of town-national state coordination. In the Italian case, there is a strong overlap between city and state; here, the author reminds us of the salience of the early modern city-state in Italian speaking areas and the relatively late consolidation into an Italian national state in the closing decades of the nineteenth century. In the Low Countries, federal institutions dominate to the point of defining how national policies in the early modern era would develop. Prak's evaluation of the English/British case includes the notion that towns and crown got along with mutual acknowledgement that the Crown was sovereign and that towns could insist on the autonomy that their charters and other privileges gave them. Each sought to expand its position without aggression against the other. These three chapter-length case studies are joined by briefer comments on the German case cast as a contrast with them. "Compared to Italy, the Low Countries and England, the German towns had a double problem: they were part of a comparatively weak state, and

<sup>1.</sup> Maarten Prak, Citizens without Nations: Urban Citizenship in Europe and the World (Cambridge [etc.], 2018), p. 107.

within that state they were forced to play second fiddle. As a result, urban citizenship had little impact on national policies and therefore remained relatively ineffective outside the local context". All the Western European cases enjoyed relatively more urbanization than was the case in East and Central Europe, making it less likely that urban centers would play as much of a role in subsequent political developments as they did in national forms of citizenship elsewhere in Europe. Prak argues that urban-level citizenship was quite similar throughout Europe but that the relationships between cities and their citizens to emerging national states differed, informing the varied character of European national states. "Whereas the basic features of urban citizenship were pretty uniform across Europe, their effects were not, and the different ways in which local political arenas connected to national institutions would seem to go a long way towards explaining the temporal and geographical variations".<sup>3</sup>

A second feature of the Part II chapters concerns a relationship between political and economic institutions, namely that Europe's urban (and national state) political institutions enabled the economic developments we see in the early modern era. This argument is well-developed in the European economic and social history literature. For his part, Prak argues for Italian city states, the economy flourished when there were more popular governments and did more poorly once those governments were replaced by less inclusive governments. He notes the close relationship between the VOC and political decision making to make clear how VOC success was enabled by state decisions. Finally, his arguments about the development of English parliamentary government fit the narrative of political representation going with opportunities for economic participation in markets associated most closely with Douglass C. North.

Were the arguments only being made for early modern Europe, we could evaluate them based on their evidence and logic. However, there has long been a smooth, indeed slippery, slope to infer from practices that enabled European economic developments of the early modern era to two far larger propositions: 1. Early modern political, social, and cultural ideologies and institutions made possible modern economic growth generally. Therefore, the absence of such ideologies and institutions elsewhere explains the absence of modern economic growth in other world regions. 2. Modern economic growth is not possible without embracing some key political principles and practices pioneered in Europe. Prak himself does no more than argue directly for early modern European political, social, and economic practices enabling subsequent European industrialization. Were it not for the way in which he makes citizenship a concept relevant to global history, I may not be as

<sup>2.</sup> Ibid., p. 238.

<sup>3.</sup> Prak, Citizens without Nations, p. 247.

uncertain as I am regarding how far he wishes to carry his claims about the more general significance of European links between political and economic institutions to situations in other world regions.

In Part III, "Citizenship outside Europe", Prak presents a chapter on China and the Middle East and another on the Americas. Before I discuss his treatment of China, the discussion of the Americas in Chapter 11 considers how European institutions of citizenship are applied in different circumstances to yield a different range of state-citizen relationships. The shift from considering the role of urban centers in Europe to those in the Americas acknowledges that the larger social contexts within which urban centers found themselves differed in these world regions. The challenge thus remains to determine the significance of such differences to the manner in which urban citizenship developed and the way in which urban citizenship's relationship to the national government shaped national citizenship in different countries of the Americas. Here, I think a sharper distinction between the political ideology informing the relationship of citizens to political authority and the institutions through which such relationships are fashioned is a useful way to begin to evaluate variations across the Americas and with Europe. Nineteenth-century successors to colonial era Iberian institutions look quite different from those in the United States or Canada, despite the shared ideological discourse of constitutionalism and liberalism. The need to distinguish between ideology and institutions and to evaluate both suggests one way to refine the analysis Prak makes of American cases. The desirability of making distinctions between political ideology and institutions is also important when we turn to consider the nature of his urban citizenship in other world regions.

Prak sets out in Chapter 10 to consider what he calls "original citizenship" in China, a phrase the author also uses with respect to his evaluation of the Middle East. Because he chooses to conceive citizenship as a set of practices and not as a combination of political principles and practices, he can find activities in both Chinese and Middle Eastern urban sites that resemble those found in early modern European cities. This comes as little surprise to specialists of either world region. To speak specifically of China, the surprise comes from imagining that such practices represent a kind of citizenship in practice if not in principle. The deep difficulty with this move is that it takes an important early modern European political concept with its rich antecedents in classical era political thought and practice and applies it to other world regions where ties to the political tradition from which citizenship ideology and institutions developed are simply absent. This intellectual move avoids asserting that early modern Chinese somehow shared or developed on their own early modern European ideas about citizenship, but it also leaves unspoken how Chinese political thought conceived the "original citizenship" practices that Prak focuses upon. It implicitly suggests that whatever the ideological framing of the practices found in Chinese urban settings that presumably helped motivate the actions urban residents took, we can comfortably disregard them in favor

of thinking the practices on their own constitute "original citizenship". Noting the absence of notions of civic community in China without pondering what beliefs motivated or at least framed their actions strikes me as oddly stripping Chinese historical actors of any deliberate agency. Without some appreciation of the political principles motivating their actions, we are unprepared to understand what historical actors – in this case, urban residents in the China of the early modern period – understood themselves to be doing.

In China, governance over the two millennia in which imperial rule had been the norm conceived the construction of political order to span urban and rural parts of society - political order was not based on classical urban models in which the concept of citizenship first appeared in the West. Chinese imperial-era policies for promoting political and social order deliberately reached into the countryside. From roughly 1100 AD, Chinese governance depended on two key components - first, the development of a rule-governed bureaucracy staffed by individuals who increasingly were drawn from successful examination candidates schooled in texts that defined what the state deemed desirable knowledge to govern, and second by the agenda shared by officials and local elites for constructing political and social order that fostered their complementary roles. Bureaucratic rule enabled a form of top-down authority to be exercised from the capital through the provinces and down to the county level where the formal administration was met by a kind of bottom up involvement of local elites, many of whom studied the same curriculum as officials and a number of whom passed the same exams and either had previously served in the bureaucracy or were qualified to do so. Building local institutions of order, including granaries to store food to help the poor through the lean spring season or as a key source of support in times of famine, schools through which a limited number of young men could be prepared for the civil service exams, and organizations to support widows and orphans involved a varying mix of official and elite efforts. For granaries in one eighteenth-century province, I assembled evidence suggesting that elite involvement in granary support was greater in wealthier areas, leaving officials more attentive to the needs of populations in poorer areas.<sup>4</sup>

Since urban centers, especially those that were centers of trade, would have some concentration of wealth, we could easily expect to find evidence of local institutions supported by elites to support social welfare. Chinese and Japanese scholars have studied for several generations the development of commercial institutions from roughly 1000 AD and demonstrated thriving commercial networks spreading over the empire, with guilds being one of the important institutional forms that organized both merchants and urban

<sup>4.</sup> R. Bin Wong, "Confucian Agendas for Material and Ideological Control in Modern China", in Theodore Huters, R. Bin Wong, and Pauline Yu (eds), Culture and State in Chinese History: Conventions, Accommodations and Critiques (Stanford, CA, 1997), pp. 303–325.

craftsmen. A new generation of scholarship on Chinese law and the ways in which its application by the bureaucracy integrated with the processes of negotiation and arbitration organized by non-official commercial elites is suggesting an integrated set of processes spanning formal government decisionmaking and choices and agreements made among private parties. For present purposes, the key point is that the relationship that guilds have with political authority does not have the same conceptual framing that undergirds European guilds' understanding of their political roles. The construction of political and social order in early modern Chinese cities was coordinated with the construction and maintenance of order in rural settings. The political ideology conceiving order made no sharp distinction between the two. It thus makes less sense in a Chinese setting to focus solely on urban institutions without comparing them with rural ones because they are connected through a common political vision of how order was constructed through the joint efforts of officials and elites. What Prak can observe, therefore, in Chinese cities is related to how order is pursued beyond cities. Indeed, Chinese recognition of the challenges of managing large cities led officials to divide authority over portions of large cities to different county administrations (e.g. Hankow, Beijing). Such divisions of large cities into more manageable areas also made it easier to integrate each with administration of the countryside.

The urban-rural divide, basic to the setting within which urban citizenship flourished in early modern Europe, simply did not exist in early modern Chinese political order. Instead, urban elites in Chinese cities pursued their activities within the same ideological frame of reference governing choices more rural elites made regarding their participation to creating institutions of local order in ways that complemented the efforts made by local officials. For these reasons, I argued in an article published some two decades ago that "citizenship" is not a concept easily applied to Chinese history before the late nineteenth century. At this time, Chinese elites became exposed to the political ideology and institutions of Western citizenship and began to employ this knowledge to reframe and reimagine political principles and practices in China, adopting the category of "citizen" as a term defining membership within the nation that bears some similarities with the term's usage elsewhere. In that article, I further concluded that it was unlikely that the late twentieth-century Chinese state would abandon practices of making commitments to its citizens and replace that kind of relationship with one in which citizens could make claims on the state basic to Charles Tilly's definition of citizenship, building on classical Roman ideas, as a "bundle of rights and

<sup>5.</sup> E.g. Maura Dykstra, "Beyond the Shadow of the Law: Firm Insolvency, State-Building, and the New Policy Bankruptcy Reform in Late Qing Chongqing", *Frontiers of History in China*, 8:3 (2013), pp. 406–433.

<sup>6.</sup> R. Bin Wong, "Citizenship in Chinese History", in Michael P. Hanagan and Charles Tilly (eds), *Recasting Citizenship* (Lanham, MD, 1999), pp. 97–122.

responsibilities". In a subsequent article, I addressed the ways in which citizenship has been understood more generally to indicate belonging to a nation as well as a relationship between individuals and their states, so that citizenship could be imagined with multiple bases including those of an interest-based calculus crucial to Tilly's formulation as well as ideological foundations relying upon shared beliefs and the invoking of common cause and destiny of a state and its citizens. Maarten Prak avoids both interest-based understandings of citizenship as well as those based more on shared beliefs. He succeeds in taking citizens and citizenship to a global scale by separating European principles of citizenship from early modern examples of citizenship as practice.

Maarten Prak's strategy of expanding the subject of citizens and citizenship to a global scale involves two quite distinct moves. Taking citizenship to the Americas enjoys the advantage that the historical actors themselves made the same transfer. Taking citizenship to the early modern cases of the Chinese and Ottoman empires is a bit trickier. For China in particular, it bears repeating that no early modern Chinese actors had any awareness of citizenship and that Prak's notion of "original citizenship" in fact flowed from a political ideology and through political and social institutions that were unrelated conceptually to European understandings and practices of citizenship. Prak can generalize the concept of citizenship in part because he focuses on a variety of urban social and economic practices without considering the political principles with which they are connected or seeking a theoretical conceptualization of citizenship to define the relationship between individuals and political authority based on either the negotiation of interests, or the promotion of shared beliefs in the nation.

Prak's choice in making citizenship a set of practices without any set of particular principles animating them is one of several European efforts recently beginning to emerge through which scholars intend to de-parochialize European political theory and concepts such as citizenship. Hilde De Weert, for instance, proposes a pre-twentieth century Chinese citizenship based on Chinese ideas of membership in a political community according to relations among different groups. The similarities she finds to European citizens stem, in my view, from the fact that Chinese political principles and practices create political order as do European ones. That Chinese and European principles and practices share this virtue does not make them sufficiently similar to make citizenship a common conceptual denominator because early modern Chinese and European political ideologies and institutions differ substantively, thereby creating different political meanings that

<sup>7.</sup> R. Bin Wong, "Citizenship, State and Nation in China", in Richard Boyd and Tak-Wing Ngo (eds), State Making in Asia (Abingdon-on-Thames, 2006), pp. 91–105.

<sup>8.</sup> Hilde De Weert, "Considering Citizenship in Chinese Imperial History", *Citizenship Studies*, 23:3 (2019), pp. 256–276.

limit the similarities of practice, leaving the differences of both principles and practices difficult to accommodate within the concept of citizenship.

My rejection of "citizenship" as a useful category of observation and analysis for Chinese history before the late nineteenth century hardly means I am forsaking efforts at historical comparison to generate understandings of similarities and differences between cases. Exercises of historical comparison are necessary to generate empirical generalizations. For the comparison of early modern European citizens with urban dwellers in the Qing and Ottoman empires we need a neutral term that prevents us from only looking at European practices without the understandings and purposes these people expressed. We need to look at what inspired Qing and Ottoman individuals to undertake the activities that in early modern Europe are those of citizens. Early modern European urban citizenship might be better understood as one form of political and social membership for which the Qing and Ottoman alternatives deserve the kind of careful treatment Maarten Prak has given his European cases.

"Membership" as a more general category into which European principles and practices of citizenship fit alongside Chinese principles and practices of establishing political belonging seems a more promising way to proceed, because membership is a noun we can make more conceptually capacious, allowing us to identify similarities and differences between European and Chinese formulations of political order without making the European concept of citizenship the standard for comparison. Hilde De Weerdt's expansion of "citizenship" beyond its ideological and institutional features forged in early modern and modern European history to a more capacious sense of "membership" only makes sense to the extent that analysts can imagine the term "citizenship" to include relations between ruler and ruled based on different ideological conceptions and enacted through different kinds of institutional relationships. Deracinating the concept of citizenship from its European soil in order for a different version of it to grow elsewhere simply means we have to understand how the nature of Chinese citizenship, for example, is similar to and different from European citizenship. Neither De Weerdt's, nor Prak's efforts to expand the pre-modern meaning of citizenship beyond European contexts help and indeed could make it more difficult to explain how European notions of citizenship, once encountered in late nineteenthcentury China, transformed the possibilities that Chinese actors could imagine regarding how relations between ruler and ruled might be recast.

The aspirations of *Citizens without Nations* are clearly expressed on the title page that introduces the reader to the book. This paragraph concludes: "Understanding citizenship's longer-term history allows us to change the way we conceive of its future, to rethink what it is that makes some societies more successful than others and to reexamine whether there are fundamental differences between European and non-European societies". The emergence of modern states and models and practices of citizenship pursuing a mix of

interests and beliefs that allow citizens to negotiate and/or accept political authority for other reasons, takes us to an historical era when no one living in a world region other than Europe, or as one of a number of Europeans settling elsewhere, had any inkling of what citizenship could mean. To imagine that we can understand citizenship globally by ignoring citizenship's European principles and consider more narrowly its practices strikes me as a flawed strategy for discovering whether or not there are "fundamental differences" between European and non-European societies.

The ability to bifurcate the world into Europe and non-Europe presumes that whatever variations exist in non-Europe, they should all be evaluated against the common standard of comparisons to European concepts. Considering the presence of urban citizenship in early modern Europe has the important advantage of directing our attention to a historical era before national states to understand the possibilities for constructing social order at small spatial scales represented by European cities. It does less well when used to evaluate early modern Chinese urban political and social organization stripped from its own historical context of the political ideology and institutions that created urban order within a territorial empire. A definition of citizenship based on practice without principles handicaps us conceptually from explaining variations beyond Europe regarding political principles and practices during the early modern era. Working to establish how political ideologies and institutions manifest in different world regions - creating effective (or fragile) bases for political order and senses of belonging - will, I submit, complement Maarten Prak's fine work on early modern European urban citizenship more than transporting this European concept to other world regions at a time before non-European historical actors had their respective moments to engage with these foreign concepts in ways consequential for their own political practices.