Stateless nation-building: Quebec, Catalonia and Scotland in the changing state system

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ABSTRACT. The reconfiguration of political space is bringing about new forms of territorial politics. The meanings of nationalism and the state are being transformed and new types of autonomist movement are emerging. These are often seen as a resurgence of ethnicity, or as attempts to recreate mini nation-states fragmented from the existing ones. Mainstream political science tends to regard them negatively. It is argued that the resurgence of minority nationalism is also a response to the needs for collective action in a world of weakened nation-states. New forms of collective identity and action are emerging which recognise the limitations of traditional sovereignty and the necessary interdependence of the contemporary world. There is much that is new here, but also much that has always been present but has been lost in the state-centred perspective of political science. The argument is illustrated by an examination of three of the most electorally successful nationalist movements in the Western world, in Quebec, Catalonia and Scotland. These are seen not as classic nationalist movements but as nation-building projects which recognise the limitations of the nation-state formula and are engaged in ‘stateless nation-building’. This project is difficult to translate into constitutional terms or to reconcile with the model of the state prevailing in the respective majority communities.

The nation-state debate

Since the 1980s, there has been a vigorous debate on the future of the nation-state. On the one hand are those who argue that economic change, technology and the rise of international regimes are rendering the nation-state redundant. On the other are those who point to the explosion of nationalist movements in the contemporary world and the proliferation of new ‘nation-states’. The problem, as so often in social science, is that terms are being used very loosely and stretched too far. Scholars are too often

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victims of their own vocabulary and seek to force new and re-emerging phenomena into the procrustean categories of their academic disciplines. In a period of rapid social and political change, we need a more refined level of analysis, one which can capture the subtleties of political change and make relevant distinctions. Nationalism is used to describe:

(a) the construction of national societies by imposing modernist principles of rational authority and destroying particularist identities;
(b) the reversion to particularistic and ethnic identities and a rejection of modernity.

These are very different processes and generalisations about the spread of nationalism which fail to distinguish between them are extremely unhelpful.

One way of resolving this problem is to recognise two types of national identity and therefore of nationalist project – the ethnic and the civic (Greenfeld 1992; Smith 1991). Other scholars distinguish between the continental or German and the liberal (Kohn 1944; Snyder 1954); the cultural and the political (De Blas Guerrero 1994); the voluntarist and the organicist (Renaut 1991). These distinctions are not exactly equivalent, but all point to a key difference between nationalist movements on the question of who constitutes the nation and on the basis for legitimacy of nationalist demands. One presents membership of the national community as given, or ascriptive; the other sees individuals constituting themselves as a collectivity. This is the sense in which the distinction between ethnic and civic nationalism will be used in this article.

Ethnicity is a notoriously difficult concept and also has been stretched a great deal further than its explanatory power permits (e.g. by Moynihan 1993). Some regard ethnic identities as primordial and unchangeable, at least in the short term. On the other side are those who regard ethnic identity as a social construction, determined by the context and the needs of the time. The evidence is in fact overwhelming that most ethnic identities are malleable, contextual and instrumental, used in order to advance specific claims or to resist others. Sometimes it is used to advance national claims, but more often for other purposes. Here we will define ethnic nationalism as a form of nationalism in which the nation is defined on the basis of ascriptive criteria and differentiation, rather than inclusion and assimilation.

Civic nationalism is a collective enterprise based upon common values and institutions, and patterns of social interaction. The bearers of national identity are institutions, customs, historical memories and rational/secular values. Anyone can join the nation irrespective of birth or ethnic origins, though the cost of adaptation varies. Civic nationalism is based upon a territorially defined community, not upon a social boundary among groups within a territory. This is not to say that any piece of real estate can form the basis for a nationalism. There needs to be a structured set of political and social interactions guided by common values and a sense of common identity. Nations in the civic vision are further distinguished from ethnic
groups in their aspiration to be global societies, containing within them the full range of social institutions and mechanisms for social regulation. Ethnic groups, by contrast, are partial societies, advancing the claims of one group within a broader context. So ethnic promotion and nationalism are not the same thing. It may be that one ethnic group takes the lead in nation-building, the construction of a global society, but that is a stage beyond mere ethnic mobilisation.

It should be emphasised that the categories of ethnic and civic nationalism are ideal types, and do not constitute a descriptive taxonomy. Most movements in practice make both types of appeal, and draw on both elements for their support. Ethnically based movements may adopt a civic discourse to legitimate themselves in a society where liberal democratic values prevail. Civic movements may appeal to ethnically-exclusive sentiments or invent ethnic identities to enhance their emotive appeal and mobilising power. What matters is the balance between the two.

Many observers insist that nationalism is a movement aimed at the establishment of its own state. If by this we mean that type of sovereign state which dominated world affairs from the mid nineteenth to the late twentieth century, then Hobsbawm (1990) is right to restrict it to the period c. 1780–1990. If on the other hand we are prepared to accept as instances of nationalism the Scottish Declaration of Arbroath (1320), Shakespeare's historical plays, or present-day movements in Quebec, then we need either to abandon the definitional connection with the state, or else stretch the concept of the state considerably.

The idea of the state has been with us a long time, but the nation-state, in the form in which we know it, is a rather recent phenomenon. It represents the coincidence in space of a number of principles of social and economic organisation. It is the primary focus of collective identity, reinforced and transmitted through culture and socialisation. This collective identity in turn provides the basis for social solidarity. The state is the framework for internal and external security. It frames an economic system, allowing us to talk of national economies, with definable, if not impermeable, boundaries. It is a set of institutions and mechanism for policymaking. In this sense, the nation-state is the product of the modern era and is currently undergoing substantial transformations (Camilleri and Falk 1991). It is transformed institutionally from above by the rise of international regimes, notably, in the three cases presented here, the European Union and the North American Free Trade Agreement (NAFTA); and below by territorial assertion. Its functional capacity remains high, but interdependence is limiting its autonomous use of this capacity. Its capacity for economic management is being eroded from above, by globalisation, capital mobility and the rise of the multinational corporation (Schmidt 1995); laterally by the advance of the market; and from below by forms of economic restructuring rooted in local and regional specificities. The three-directional erosion of the nation-state from above, from below and laterally
in the face of the market, has broken the link between economic change and policy-making and between policy-making and representation. It has undermined social solidarity and made difficult the old class compromises and trade-offs which underpinned the West European welfare settlement of the post-war era. It has weakened the capacity of states to manage their spatial economies. It has even threatened economic efficiency, by militating against the production of public goods and the social cooperation which is the essential counterpart to competition in a market economy (Albert 1991).

So we are in a world where multiple spheres of authority coexist with multiple systems of action. It would be a serious error to present this as totally new, or to contrast it with a mythical state of the classical era which was able to monopolise authority and internalise the policy process. These tendencies have always been present, but have been greatly magnified in the contemporary era and affect most seriously those states which in the past have sought to centralise and monopolise authority. In another sense, these trends represent a step back in history, to an era of overlapping authority, multiple identity and complexity, before the rise of the modern state (Tilly 1990; Tilly and Blockmans 1994; Majone 1995).

There are a number of intellectual and political reactions to the crisis of the interventionist welfare state and the post-war settlement. One is a retreat to a hyper-individualism typified by Margaret Thatcher’s famous remark that there is no such thing as society. This is seen in the intellectual arena in the popularity of public choice and rational choice forms of analysis; and in the political arena in the form of neo-liberalism. A second reaction takes the form of identity politics, which again denies the possibility of universal values or a public good and attributes interests to ascriptive identities. Ethnic and racial politics is one form of this, though certain forms of gender politics would also qualify. A third possibility is the construction of new forms of collective identity and action in both state and civil society which recognise the limitations imposed by current conditions as well as the plurality and complexity of contemporary identities themselves.

The pressures on the nation-state may be global but their impact varies according to the resilience of the state itself. Where there is a pre-existing territorial fault line, then this may be deepened and territorial communities form the basis for collective action. So we see the re-emergence of sub-state nationalisms. It is my argument that these can represent a form of civic identity and action, which needs to be distinguished both analytically and normatively from the ethnic politics seen in many parts of the world.

This has proved contentious. Even scholars who accept the concept of civic nationalism often confine it to the large states of Western Europe, built by consolidation, and insist that minority nations are by definition ethnicities. Others are more normative, seeing minority nations as somehow backward and large nation-states as progressive. This attitude, which was common at the time of the minority nationalist revival of the 1960s, has re-emerged in the 1990s in observers such as Hobsbawm (1992) and
Dahrendorf (1995). The world of minority nationalism is presented as a Jurassic Park in which the monsters of ethnicity have come back to wreak havoc on the civilised world. Ethnic slaughter in Bosnia is placed in the same analytical category as the demand for Scottish self-government. This can be seen as a prejudice fostered by metropolitan bias (Keating 1988). In principle, there is no reason at all why small, stateless nations should be more ethnically oriented and less civic than large ones which have attained statehood in the past.

So we can see nationalism as a principle of self-determination. The group with the right to self-determination may be defined in a number of ways. The end of self-determination is not necessarily a nation-state, since that is a historically contingent institutional form.

The reinvention of territory

The changes which the state has experienced in the new international economy and political order are seen by some as destroying territory as an organising principle for social life (Badie 1995). Internationalisation breaks territorial solidarities and militates against collective action. Yet at the same time, these forces serve to reconstitute political space at a diversity of levels (Keating 1992). There has been a revalorisation of territory as a factor in economic development, with the burgeoning literature on industrial districts and innovation (Dunford and Kafkalas 1992; Harrison 1992; Putnam 1993; Amin and Thrift 1994; Storper, 1995). Politics in many states has decentralised. Regional and local cultures and languages have re-emerged in the face of American cultural hegemony. A lot has been written on the emergence of a Europe of the Regions, in which regional actors deal directly with the emerging European order (Petschen 1993; Bullman 1994; Jones and Keating 1995). More generally, the new paradigm looks at the links between sub-state territories and the international political economy (Courchene 1995; Keating 1995b). Globalisation and continental integration, far from eroding minority nationalism, may encourage it (Parés and Tremblay 1990; Mlinar 1992), but in diverse forms. Nationalities and national identities are constructed and reconstructed historically in specific ways. It is very difficult to appreciate this restructuring if we use only the classic categories of state-based political science. Yet much of the work on the new nationalisms does just this, merely seeking new actors to play old roles. If we take a longer historical perspective, however, and go back to before the nineteenth-century nation-state and forward beyond it, then we find a much richer set of ideas.

The central question of this article concerns the possibilities of building systems of collective action which recognise the limits of sovereignty in the modern world. How can non-state territories constitute themselves as polities and project themselves in the international arena? This can be described as a process of nation-building, recognising that nation-building is
distinct from state-building and in the modern world does not necessarily imply the establishment of an independent state. Given the weakening of the nation-state and its loss of monopolies, the reconstruction of political space is occurring as much within the realm of civil society as that of the state. The first requirement is the construction of collective identities. Here we confront the dilemma of modernity (Touraine 1992a). A collective identity rooted merely in the past (whether a real or fictive past) provides no basis for coping with the present and future (Renaut 1991). A collective identity based purely on present considerations lacks a basis for values. This is why nationalism cannot be seen merely as a form of rational self-interest or in purely instrumental terms. This would not explain how the identity came into being, or why that particular one was chosen. Successful and modernising nationalisms can precisely link past and future. A purely ethnic identity militates against wider social cooperation and adaptation as well as social solidarity. It fails to achieve social integration and instead may reinforce exclusion and allow members of the dominant group to monopolise the scarce employment opportunities. A more secure base is cultural identity, where the territorial culture is sufficiently open to assimilate incomers and members of minority groups. This is a delicate issue. A culture which has no common principles fails to provide the basis for solidarity and collective action or citizenship rights – this is the liberal criticism of multiculturalism (Bisoondath 1994). On the other hand, a common culture defined too restrictively may exclude some members of the society and become a mere mark of ethnic differentiation. So culture must be capable of adaptation and absorption of incomers. Also needed is a capacity for collective action in the face of the continental and global market. Territories cannot control the global market, but they can manage their insertion into it more or less successfully and on terms more or less of their own making. At one extreme, they can prostrate themselves to global capitalism, in the mode of the southern states of the USA. At the other, they may be able to manage their own relationship with the market in a variety of ways. Finally, there is the ability to project the territorial society as an actor in the state, continental and international arenas. This implies a recognition of the limits to sovereignty in the modern world and the ability to exploit the opportunities which present themselves.

There are many examples of movements of territorial reconstruction along these lines in the modern world. I have examined in some detail three of the most prominent, those of Quebec, Catalonia and Scotland. These are three nationalist movements, based on historic territories but which have used historic materials to reconstruct systems of collective action in the modern context. Their official doctrine is firmly civic rather than ethnic but this is not always reflected in their mass base. They espouse free trade and have abandoned protectionism in favour of full insertion in the continental and global economy. They do not aspire to the creation of classic nation-states but recognise the limitations of sovereignty and seek a place within
the state and international order which recognises this. There is no constitutional formula to accommodate these aspirations, and they continually confront a state system which does not give formal recognition to them. On the other hand, the new international political economy, civil society and to some extent international regimes do present a new opportunity structure for their projection, not in competition with states, but as complementary actors.

In the rest of the article, I examine the changing pattern of national identity in the three cases; nationalist discourse and its reception; nation-building through culture and language; nation-building in civil society and the state; trading patterns and economic management; and the projection of the territorial society in international affairs. The data is illustrative rather than definitive and more extensive treatment is available in Keating (1996). The conclusion is that we have three national movements in search of stateless nationalism, adapting more or less successfully to the modern world, with strong parallels to the pre-state world of early Europe.

The reconstruction of identity

The nation-state has served as an important forger of identity and this national identity underpins the constitution of the nation as a political system and as an actor in the world. Now we are seeing a reformulation of identities and a separation of state and national identity. In a complex world, identities are no longer necessarily singular and exclusive but multiple, with different identities used in different circumstances and projected in different arenas. The data in the three cases show a growth of minority-national identity at the expense of state-wide identity. Equally we see a growth of multiple identity, but with the minority-national one providing the primary point of reference for political judgement.

The definition and content of this identity is also changing. All three nationalist movements consciously espouse a civic and inclusive rather than an ethnic conception of the nation and have stated many times that anyone who lives and works in the nation is to be considered part of the nation. This is least problematic in Scotland, which has long been marked by cultural or 'ethnic' cleavages, between Highlanders and Lowlanders, Gaelic, Scots and English speakers, Irish and Scots, Protestants and Catholics. Modern Scottish identity is an amalgam of these elements, which recognises the distinct features of each. It is rooted in institutions and commitment, rather than ancestry and ascription. In Quebec, the nationalist movement has made a transition since the 1950s from an ethnically-based movement of 'French Canadians' to a territorially based movement seeking to build a nation within Quebec (McRoberts 1988; Balthazar 1990; Juneau 1996). Official policy is to integrate immigrants into Quebec society through cultural assimilation.
Yet ethnic nationalist elements remain and constantly embarrass mainstream nationalist leaders with their indiscretions. Perhaps the most notorious was uttered by Parti Québécois premier Jacques Parizeau on the night of the 1995 referendum, when he blamed the narrow defeat on ‘money and the ethnic vote’. The outburst was significant and reflected one stream in Quebec nationalism; equally significant was the round condemnation from many other nationalists and Parizeau’s prompt resignation. In Catalonia, nationalism has always had a strong civic dimension and since the 1960s this has been dominant. Nationalists repeatedly stress that anyone who lives in Catalonia and wishes to belong is Catalan.10

Official policy is one thing, popular response perhaps another. Here we find some sharp contrasts. In Scotland, the former ethnic division between Scottish Protestants and Irish Catholics has largely been transcended, in contrast to the situation in Northern Ireland.11 The 300,000 people of English birth in Scotland show a rather high degree of assimilation. Few complain about discrimination on ethnic grounds12 (Dickson 1994) and few even identify themselves as English in Scotland. Most take refuge in the generic category of British, but almost as many consider themselves Scots as English. In the 1992 general election, 9.6 per cent of them even voted for the SNP (against 23.3 per cent of Scots-born) (Dickson 1994). Catalonia has had a very high rate of immigration since the 1960s. At the time of the transition to democracy, 40 per cent of the population had been born outside the region and the figure has remained high. Yet there is a rather high degree of assimilation as Figure 2 shows. Most noteworthy is the high degree of dual identity, which commands majority support among all categories. Scotland and Catalonia have therefore forged an inclusive civic
identity, divorced from ethnic particularism and which is compatible with wider loyalties. Quebec is another matter. Identity is highly correlated to language group, with Québécois identity felt overwhelmingly by the francophone community.

**Nationalism and independence**

The growth of national identity in all three cases has meant that national themes tend to colour political debate and issues are increasingly presented in a national frame. Opinions on constitutional change, however, span a wide range, from support for the status quo, through moderate home rulers to separatists. The nation-building project is invariably placed in the context of international integration and free trade. For some nationalists this has the obvious advantage of lowering the barriers to independence and removing the old objection that it would disrupt trade patterns. State-centred analysts tend to fit this into the procrustean categories, arguing that international regimes simply permit the emergence of new states. Examination of party programmes and discourse shows a more subtle appreciation of the limits of sovereignty. Continental integration and minority nationalism are complementary processes, eroding the old states and allowing for the emergence of new political forms.

The Scottish National Party represents the most orthodox nationalism in the three cases. It has accepted membership of the European Union and is more strongly committed to it than either of the two main British parties, but it favours an intergovernmental rather than a supranational Europe, with Scotland among the states. On the other hand, it insists that, after independence, the ‘social union’ will be preserved and contains within its
ranks a large element favouring a more limited form of autonomy. The parties of the Scottish Constitutional Convention (Labour and Liberal Democrat) favour Home Rule within the UK, but with a strong European dimension.

In Quebec, there is a similar division between the Parti Québécois (PQ), which favours a sovereign Quebec, and the Quebec Liberal Party, which wants more power within Canada. Yet both see Quebec as a special case within Canada and stress the need for a North American dimension to the constitutional settlement. The PQ's vision of sovereignty is highly attenuated. It includes provision not only for free trade with Canada, but for monetary union, free movement of people, joint citizenship and joint positions on international affairs (PQ 1991, 1993). Quebec would retain membership of all the international bodies to which Canada belongs. Under pressure from its nationalist allies in the Bloc Québécois and the Parti Action Démocratique du Québec, it modified its stance further in the referendum of 1995, proposing sovereignty along with economic and political partnership with Canada. The latter would include joint executive and parliamentary institutions.

Catalonia has a long tradition of stateless nation-building, dating from the period between Spanish unification and the abolition of its self-governing institutions in 1714. A commercial and trading nation, it was able to play in the Spanish political and economic arenas as well as the European and the Mediterranean ones. In the new Europe, it has resumed this tradition and its ruling party Convergència i Unió combines a strong assertion of nationalism with a lack of interest in separatism (CiU 1992, 1994). It plays a full part in Spanish state politics, to the extent of concluding governing pacts with successive minority socialist and conservative governments in 1993 and 1996 respectively. The Esquerra Republicana de Catalunya, which gains around 8–9 per cent of the vote, has supported independence in recent years but this too is put in the context of a people's Europe. The Catalan Socialists favour a federal Spain with more powers for Catalonia. It would be a mistake to view this as a purely instrumental strategy. Catalan nationalism has a strong emotive content (Puig 1980; Hernández and Mercadé 1981) but this operates in a modern context.

A striking absence in all three cases is a serious debate on security policy. The collectivisation of external security is taken for granted and neutralist tendencies in the three nationalist movements have been largely stilled. There is an element of free-riding involved here, especially in Quebec, where nationalists will point out that any aggressor would have to get through the United States and Canada in order to reach Quebec. Otherwise, nationalists of both the strong and weak form agree that small nations must necessarily be part of broader security arrangements.

This policy line finds strong support in the electoral base. In all three cases, there is a strong popular support base for nationalism but minority support for separatism (Font 1988; Montero and Font 1991; Blais and
Nadeau 1992; Montero and Torcal 1991; Brand et al. 1993, 1994 a, b). For Scotland and Quebec, there are substantial time-series data and these show growing support for nationalism and for independence, as this has been placed in the context of continental integration. When the question is put as independence in the classic sense, support falls away. Figure 3 shows support for constitutional options in Quebec since 1977 over a twenty-year period. The hard option of independence consistently fares worse than the option of sovereignty, which in turn fares worse than the looser formulation of sovereignty association. Indeed, sovereignty association has consistently gained majority support since the failure of the Meech Lake accord, which would have given Quebec a distinct status, in 1990. Figure 4 shows levels of support in Scotland since 1975. There always has been majority support for constitutional change, but support for independence grew steadily from the 1980s, especially when it was placed in the European context. It is more difficult to present trend data for Catalonia. Polls at the time of the transition were often technically unsound, and opinion was unstable. Time-series data is available for more recent years, though not for long enough to establish trends. Table 1 gives the figures for 1994. The Catalan surveys, like those in Quebec, are highly sensitive to the wording of the question. When in the 1994 survey respondents were asked vaguely if they were in agreement with the concept of Catalan independence, 35 per cent responded positively (against 49 per cent responding negatively). When this was presented in a list of options in the same survey, support for independence halved, to the figure given in Table 1.

There are no survey data correlating attitudes on continental integration and on nationalist attitudes, but ecological evidence suggests that the link made at elite level is less understood at mass level. Opinion in Quebec is rather less hostile to NAFTA than elsewhere in Canada but the difference is not dramatic (Martin 1995). There is less hostility to the EU in Scotland than in England (Brown et al. 1996) but hostility is greater in the areas of SNP strength in the North. There is no organised opposition to Europe in

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**Figure 3. Support for sovereignty options, Quebec 1977–1996.**

*Source: Angus Reid, Leger and Leger, data supplied by Maurice Pinard*
Spain, but data from the European Values Study suggest that voters in Catalonia are somewhat less enthusiastic than elsewhere (Andrés and Sánchez Fernandez 1991). Europe is not embraced with positive emotion, but is seen more as a politically neutral space where Catalonia can enjoy some freedom of action.

**Nation-building, culture and language**

An important element in nation-building and collective identity is a common culture and language. These may function as markers of ethnic identity, distinguishing natives from others; or be the basis for a common civic culture, by providing a vehicle for assimilation. A common culture may also have economic effects by fostering collective identity and thereby
facilitating the production of public goods. It may encourage the maintenance of collective identity in the face of the international market. Yet that very market is the purveyor of American cultural products which undermine minority cultures. At the same time, the aspiration to insert the territorial economies into the global trading order requires a command of state-wide and international languages. Language is thus an important factor in the minority-national/global interface.

Language is a key element of national identity in both Quebec and Catalonia and in both cases language policy is used increasingly as an instrument of nation-building, and less as an ethnic marker (Keating 1997). For a long time Quebec governments sought to preserve the purity of the French ethnic community by insulating it from the anglophone economic community. They tolerated an ethnic division of labour in which anglophones held the dominant economic power and the francophone majority was concentrated in lower status occupations. The Quiet Revolution of the 1960s saw a change in strategy and new language laws aimed to improve the position of the francophone community in the state and private sector, giving exclusive official status to French and stipulating its use in business. This made French an essential part of the cultural capital for progression in Quebec society and opened up higher status occupations to francophones. It was one of the factors in building a class of indigenous Quebec entrepreneurs and Quebec-owned businesses. In education, they sought to restrict access to English-language schools and to force immigrants into the francophone ones, so expanding the French-speaking community and breaking down ethnic barriers. Policy towards the native anglophone community has been very different. Despite the complaints of some anglophone anti-nationalists, there has been no real attempt at forced assimilation and they have been allowed to retain their own institutions, including schools, universities and health and social services. This may be both tolerant and a political and constitutional necessity, but it shows the limits of nation-building through language. So some Quebec nationalist intellectuals have advocated abandoning the language laws after the attainment of sovereignty, with a view to building an inclusive civic nationalism which would embrace both communities, while recognising the French majority.

A more important factor in the loosening of the language laws has been the imperative of participation in the North American and global economy. Since the Quebec anglophone middle classes have been forced to become bilingual, they could become the privileged interlocutors between Quebec and the continental economy. So the Quebec government has relaxed its efforts to protect young children from linguistic contamination and now encourages the learning of English at an earlier age. In 1993 most of the machinery for enforcing francisation of businesses was abolished by the Quebec Liberal government, together with the legislation restricting non-French advertising. This might be seen as a concession to globalisation and
Table 2. Linguistic ability in Catalan, Catalonia 1993 (per cent)

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*Source: Centro de Investigaciones Sociológicas 1994.*

the reality of English as the international language of business; it also reflects the very success of the language legislation in making French the normal language of Quebec and the greater linguistic security of the francophone community. Yet tension between linguistic preservation and participation in an anglophone world of international business remains and the PQ government, having narrowly failed in the sovereignty referendum in 1995, has been caught between the need to present Quebec as a cosmopolitan trading community, and the demands of its militants for more restrictive language laws.

Catalonia has followed a different path, deliberately avoiding a segregated two-language society in favour of bilingualism. Catalan is the official language of Catalonia and the language 'proper' to it, but Castilian is recognised as the official language of the Spanish state. A Llei de Normalització Lingüística was passed in 1983 with the consent of all parties in the Catalan parliament. Education is to be through the medium of Catalan and, while the right of parents to have their children educated in Castilian is theoretically recognised, there is to be no segregation of schools or classes by language. All children are required to have a functional knowledge of both languages as a condition of school graduation. They are also obliged to study a third language, normally English or French. This policy is aimed at the assimilation of the large number of southern Spanish immigrants into the Catalan community and the avoidance of ethnic distinction. Since Catalan is a high-status language, there is a strong incentive for lower-class immigrants to learn it, and especially to ensure that their children have a command of the language. It is also geared at allowing Catalans to function in their own language within Catalonia, while also participating in the Spanish and global arenas.

Table 2 shows that there is still a considerable language gap between immigrants and natives, but other evidence shows that this gap narrows greatly among the younger generation (Arenas 1991; Institut Estadística de Catalunya 1993). Concentrations of non-Catalans exist in the older industrial areas and remain outside the mainstream culture, but steady assimilation is taking place across the generations. Polls show high levels of support even among immigrants for the policy of linguistic normalisation.
(Keating 1997); opposition is concentrated among the españolista sections of the middle class and the political hard right.

Catalonia has an advantage over Quebec in regulating its language policy in that language is not primarily an ethnic marker but a badge of achieved status and so attracts assimilation. In Quebec it remains an ethnic marker in that learning French does not make one a francophone. Catalonia also has a tradition of bilingualism in that there are no unilingual speakers of Catalan. Participation in the global economy is not a threat to its language since the threat comes from Castilian, which is not a global language. In Quebec, globalisation reinforces one of the competing local languages.

In Scotland, there is not a major language issue, since English predominates and the other two languages, Gaelic and Scots, are limited in their range. Accent is sometimes used as a mark of distinction, but it is not a good one, since many Scots, even prominent nationalists, speak with English accents. Yet there are cultural markers. These are more subtle and have to do with identity and attitudes, which can be acquired. Support for Scottish sporting teams is one; complaining about London-based government is another. English people taking positions in Scottish public life usually go native, often with considerable enthusiasm. Since the 1980s there has been a revalorisation of Scottish culture which has been transformed from a branch of British culture and recognised as a European culture in its own right and a way of looking at Scotland's position in the world.

Civil society and the state

Minority nations cannot simply aspire to reproduce the state structures of another era. They can, however, constitute themselves as systems of action in the face of the global market through the reconstruction of civil society. The construction of a territorial civil society and its articulation with the state and sub-state structures is therefore a critical feature of the politics of limited sovereignty.

A notable development in all our three cases is the building of social and economic institutions within the national society, sometimes linked to those of the wider state society, sometimes not. In the realm of culture, leisure and voluntary social activism, just about every organisation is distinct from that of the state society in all three cases and this trend has been accentuated. For sports, the distinctiveness is particularly notable in Scotland. Professional organisations are often organised separately. In the economic realm there is less differentiation. Quebec trade unions are organised separately from their counterparts in the rest of Canada, though they participate in some joint organisations. In Scotland, the British trade unions operate, though their local branches affiliate to the Scottish Trades Union Congress, which is separate from its British counterpart and has played a more prominent part in public life since the 1980s. It has been a
leading supporter of Scottish home rule within the United Kingdom. Trade unionism is weak in Catalonia (Andrés and Sanchez Fernandez 1991), and the separate Catalan trade unions are very minor actors. The main Spanish unions operate there in a somewhat distinctive mode, seeking to incorporate immigrant workers while inserting themselves into the Catalan world, for example by supporting decentralisation and language normalisation (Lope 1992). Trade unions in all three cases are torn between the need to reach out to the local working class and the need to preserve unity of action at the state level. In the case of Quebec, this has led to support for sovereignty, combined with joint action with Canadian unions against North American free trade (Rouillard 1989; Dionne 1991; Boucher 1992). In Catalonia and Scotland, it leads to support for home rule within the state. Scottish trade unions have adopted a rather enthusiastic Europeanism as a reaction to exclusion from consultation by the UK government since the 1980s.

Employers’ groups have also organised on the basis of the minority nations (Aguilar 1987), though they do not support nationalism. At the same time, they have moved strongly in favour of free trade and this tends to weaken their former dependence on the central state. They oppose anything which threatens to divide markets and, while nationalist support for free trade has assuaged some of their fears, they remain at most neutral, but more often opposed. Small business and the lower middle classes, on the other hand, have been more supportive of nationalist goals. This has given a class dimension to the nationalist project, though it would be a major error to reduce the national issue to a class one. There is also growing evidence that business can accommodate itself to constitutional change, once it is assured that the market will not be divided and that it may even favour changes which improve government effectiveness and devolve decision-making. So both unions and employers have responded to the new political economy by internationalising and reterritorialising at the same time, but not in a very cohesive or consistent manner. Politics is a secondary matter to them and their constitutional thinking tends to be poorly developed. Of the two, unions are more territorialised and employers more internationalised, but both experience similar tensions and seek interlocutors at all levels, the territorial, the state, the continental regime and the international.

The reconstruction of territorial identity and systems of action has therefore been proceeding apace within civil society. Civil society, however, cannot exist entirely on its own in the absence of state institutions and this growth has been paralleled by a decentralisation of the state. In the case of Quebec this has taken the form of an expansion of the Quebec government’s scope and competences, so that it increasingly forms the reference point for Quebeckers. The fiscal crisis of the Canadian state will accelerate this process, whatever the constitutional provisions. In Catalonia, the restored Generalitat has gradually extended its competences and sought to speak for Catalans in state politics as well as in Europe. In Scotland, the Conservative
Figure 5. Trade as % of GDP. Quebec and Canada 1984; Scotland 1989; UK 1989; EU 1989; Spain 1989; Catalonia 1986.
Sources: Scottish Office (1994); Eurostat (1994); Proulx and Cauchy (1992); Giraldez and Parellada (1990); Ministerio de Economía y Hacienda (1990); Cambra Oficial de Comerç, Industria i Navegació de Barcelona (1990); Generalitat de Catalunya (1992). There are no figures for Catalonia’s trade with the rest of Spain.

government set its face against political devolution but continued the process of administrative devolution in train since the 1960s, to the point that the secretary of state for Scotland is now responsible for nearly all domestic administration in Scotland, with the notable exceptions of the tax and social security systems.

The construction of institutions within civil society, along with decentralisation of the state, has internalised political debate within the three nations. Issues are increasingly appraised according to how they impact on Quebec, Catalonia or Scotland, and this in turn has aided the nation-building project.

The economy

An important aspect of the nation-building project concerns the ability to manage the insertion of the national society into the global economic order. All three nations are heavily involved in trade, whether with the rest of the state or the world, as figure 5 indicates. A policy of free trade is a logical consequence.

The move to support for free trade nonetheless represents a new form of nationalism, detaching it from economic protectionism (Meadwell 1993; Martin 1995; Meadwell and Martin 1996). It also represents a shift in the historic nationalist mission in all three, but especially in Quebec and Catalonia and opens up a range of policy options and considerable scope for functional independence from the state.

Yet internationalisation could potentially destroy the nation-building
project by reducing the territorial economy to a series of linkages in externally controlled sectoral networks. It sets up a potential opposition between the spatial rationality of local actors, concerned with the impact of investment decisions in their territory, and the aspatial rationality of the global corporation. In the absence of tariff protection, promotion of the territorial economy depends on local ownership and the ability to mobilise resources and energies behind a development programme. Since the 1960s Quebec has had such a project, sometimes dubbed 'Quebec Inc.', or 'market nationalism' (Courchene 1986, 1990; Latouche 1991; Arbour 1993), a coalition of government and business actors committed to expanding Quebec ownership and Quebec’s insertion into the North American economy. An early product was the expansion of Quebec ownership in industry. This was initially a project to increase francophone control within Quebec but has led to the building of a series of large Quebec-based firms and the emergence of a new corporate elite, part of an integrated state-private sector business class. Figure 6 shows the growth of Francophone ownership. These figures, which were compiled for linguistic purposes, can be taken as a proxy for local ownership.

Global economic integration and specifically the North American Free Trade Agreement, pose a threat to Quebec Inc. Some nationalists (Latouche 1991) insist that the more integrated Quebec model will better withstand the challenge of American-style individualist capitalism than its counterpart in anglophone Canada. Ironically, however, it would be best able to preserve its model as a province of Canada, since as a sub-state entity its policies are not subject to the full weight of trading rules (Young 1992, 1995). An independent Quebec would also have to negotiate its own place within NAFTA and it is unlikely that the rest of Canada would continue to argue for exemptions for the Quebec dairy industry or to allow it to take a large share of the Canadian market at the expense of cheaper US produce. Shrewd observers thus recognise that stateless nation-building provides the best deal.\[16\]
In Scotland, by contrast, local ownership has receded, as Figure 7 indicates. Scotland lost a large part of its indigenous bourgeoisie after the First World War and local ownership continued to decline after the Second World War (Scott and Hughes 1980). From the 1940s onwards it was increasingly dependent on the British state, through nationalised industry and regional policy. The privatisations of the 1980s and 1990s were not used to rebuild a Scottish industrial class and, although there were some political battles over non-Scottish takeovers of key sectors, these were not generally successful.

The Scottish Office does have an important role in industrial promotion and has forged a Scottish economic policy community. There is some commitment to cooperation among government, business and trade unions in the promotion of Scottish interests in London and Brussels. This cross-class Scottish territorial lobby has been encouraged by the strengthening of Scottish-level organisation by employers and unions and is the most effective in the UK. Yet this is countered by partisan differences and the weakness of the Scottish indigenous sector. The patterns of cooperation which have emerged are much weaker than in Quebec.

Catalan nationalism in the early part of the twentieth century was led by a dynamic bourgeoisie, frustrated by an archaic state. Nationalist rhetoric puts a stress on industrial dynamism and economic autonomy. We do not have equivalent figures for Catalonia but such evidence as exists suggests that the small and medium sized businesses which have been a strong feature of its economy face serious problems of modernisation and competitiveness. Investment in large plants and technical innovation come increasingly from multinational capital (Costa 1990; Costas 1990). Catalonia was in the past dependent on the Spanish state, not for subsidies but for tariff protection. Opening up of the economy and Europeanisation have undermined this, as the Catalan parties themselves have eagerly embraced internationalisation. There is a pattern of collaboration among business, government and trade unions, but again the links are not as close as in Quebec, and Catalonia, like Scotland, is becoming more dependent on international capital as it becomes less dependent on the state.

Economic change and free trade thus undermine the old arguments against nationalism as they lessen dependence on the central state. They do
not, however, point towards independence. The three national societies still look to their respective states to mediate the effects of the international market and nation-builders are aware of the dangers of substituting one form of dependence for another. Instead, they seek opportunities where they occur and, while avoiding the costs and risks of independence, try to operate within the various arenas in which they find themselves. One of these is the international arena.

**The international dimension**

An important aspect of nation-building is the projection of the nation in the global and continental arenas. The politics of stateless nation-building does not require a foreign policy mimicking traditional diplomacy. Rather it requires an external policy which is targeted on specific parts of the world and actors, and focused on specific objectives. Generally speaking, external policy for non-state governments serves three aims. It serves economic needs, in promoting trade and investment; it can secure support for language and cultural development; and it legitimizes nation-building and helps consolidate it at home by placing the minority nation in the wider family of nation-states. The external linkages of Quebec, Catalonia and Scotland have been intended to achieve these limited purposes, rather than to displace traditional forms of diplomacy and international power politics.

The most elaborate effort and the most state-like is that of Quebec, which goes back to the Quiet Revolution of the 1960s. It has its own Ministry of International Affairs and a network of offices abroad which at one time numbered twenty nine (Balthazar 1991, 1992). Its efforts on the economic side are concentrated on the United States. Here it seeks markets, cooperation with US states and investment. It also seeks to protect the Quebec economic model from hostile action by US governments and firms. It counters the publicity efforts of environmentalists hostile to the great hydro-electric schemes, whose viability is dependent on exports to the United States. The Parti Québécois has also tried to reassure Americans that Quebec sovereignty is not a threat to them, through lobbying in Washington but, more importantly, by regular visits to Wall Street to assure the holders of Canadian and Quebec debt that their money will be secure. For cultural development and general political projection, Quebec looks to France and the francophone countries. It maintains a large delegation in Paris, which the French government accords quasi-diplomatic status. It also has a presence in Latin America and Asia. Quebec external policy was initially focused on the provincial government but increasingly is the affair of civil society and business groups. There have been confrontations with the Canadian federal government but the Quebec governments know that Canada remains an important channel of access to the world, notably in NAFTA negotiations. Paradoxically, external policy and representation
have been pushed more strongly by Quebec Liberal than by PQ governments, the latter being more concerned with attaining sovereignty than with para-diplomacy. The overseas offices were an early victim of expenditure retrenchment by the PQ government in 1996, with only those in Paris, New York, Brussels, London and Tokyo surviving.

In Catalonia, external action has always been less dominated by government. The Catalan government has also been careful to distinguish it from classical foreign policy. The main outlets are in Europe and the Mediterranean. The Catalan government has been a vocal supporter of a Europe of the Regions and, within the tight limits imposed by the intergovernmental system of policy-making (Keating and Hooghe 1996), plays the maximum role in the European Union. It is active in regional associations in Europe and in the promotion of inter-regional linkages. Its office in Brussels is not run directly by the Catalan government but by the Patronat Català Pro Europa, a quasi-private body and even after the recent decision by the Spanish constitutional court that regions can have direct representation in Brussels, it has opted to retain this formula. The Catalan government cooperates quite closely with the Spanish government in Brussels and elsewhere and Catalan nationalists have always been careful to retain their place in the state-wide political arena.

Scotland, lacking its own institutions of self-government, plays a much more limited role in the international arena, but its administrative institutions have made some efforts at separate promotion abroad. After battles with London departments, the Scottish Office and its agencies were able to mount a partially independent inward investment and tourism effort. Scottish representation in Europe has to pass largely through the Scottish Office and the office in Brussels of Scotland Europa has a very weak political role (Keating and Jones 1995). The Scottish Constitutional Convention has proposed a stronger role for Scotland in the EU, including Scottish representation on delegations in the Council of Ministers and even invoking the Maastricht provision to allow the Scottish minister to lead them.

An important arena for non-state governments is provided by international regimes like NAFTA and the European Union. For some nationalists, this provides a low-cost route to independence, removing the economic obstacles which were present in the past. This is something of an illusion. The three nations remain more tightly integrated into their host states than into the respective international regimes and independence would entail very considerable cost and disruption. Others see international regimes as a device to circumvent the state government. This too is utopian. State governments are the primary actors in the EU and the only actors in NAFTA. The shrewdest actors, like the Catalan nationalists, recognise this and so seek to act in all arenas at the same time, penetrating the complex networks of policy-making and making deals where possible. In 1993, Jordi Pujol struck a deal to support the minority socialist government of Spain; in
1996 he made a similar deal with its conservative successor, extracting concessions on Catalan autonomy and ensuring a Catalan role in the politics of the central state. This is the politics of stateless nation-building. There are severe limitations on the actions of a stateless nation in the international arena but there also advantages in avoiding the costs of statehood.

Conclusion

We have traced the growth of minority nationalism as the state has been transformed and penetrated by supranational, subnational and private interests. This is a new form of nationalism, but rooted in historic traditions and identities. Nationalism has re-emerged as a vital principle of identity. It cannot be suppressed in the name of a supposed modernisation but, as in Central Europe, it can be diverted into beneficent or destructive channels (Michel 1995). Support for separatism in all three cases is rather weak, but combined with a strong sense of national assertion. The modal point in public opinion in each case corresponds to the option of effective self-government in the context of a changed state and the respective continental free trade regime. It is tempting to point to contradictions in the evidence, summed up in the old saw that Québécois want an independent Quebec in a strong and united Canada. Many observers pointed to evidence during the 1995 Quebec referendum campaign that up to a third of YES supporters thought that Quebec would still send MPs to Ottawa and they would keep their Canadian passports. Similar findings are available from polls in Scotland and Catalonia. Opponents of minority nationalism are affronted by the practice of Québécois, Catalans and Scots of playing in different political arenas at the same time, pressing for autonomy at home while retaining a presence in state politics and venturing into the international arena. It may be, however, that it is not the electors who are wrong, but the categories used by political scientists and constitutional lawyers, who insist on an outdated notion of sovereignty and on the uniformity and homogeneity of the nation-state.

There are historic roots to this. The concept of state sovereignty is not known to constitutional theory in the three nations. Rather there is a contractual tradition, in which authority is shared and bargained. This principle appears in the 1707 Treaty of Union between Scotland and England, which in 1953 led Lord Justice Cooper to declare that parliamentary sovereignty was unknown in Scotland and could not be used to override the union settlement (Mitchell 1996). Scots have always sought to carve out a distinct place in the UK, the empire and later Europe, maximising autonomy in a variety of ways (Paterson 1994). In Quebec, there is a broad consensus that the 1982 Canadian constitution is illegitimate because it did not receive the endorsement of the representatives.
of Quebec. Catalans hark back to the complex system of contractualism before the abolition of their self-governing institutions in 1714 and retain this as a feature of their society (Giner 1984). These are societies in which the notion of limited and shared sovereignty is deeply rooted.

In all three cases, the civic conception of the nation continues to compete with the ethnic, but the former has been gaining ground. It is dominant in Scotland, largely dominant in Catalonia and stronger in Quebec, though here there continues to exist a sharp ethnic distinction based on language. This modernised nationalism represents, not a lapse into tribalism or identity politics, but a search for collective identity and a capacity for collective action in a complex world. As well as carrying support in the society as a whole, a civic nationalism also carries greater external legitimacy. Another striking finding is that citizens in these three cases refuse to adopt exclusive identities but recognise that they belong in multiple spheres and groups; different identities can be mobilised for different purposes. Again, those scholars who wish to force data into their own procrustean categories might choose to see this as evidence of contradictions. Others might see it as a realistic adaptation to contemporary reality and the need to operate within distinct spheres of action if we are to retain the capacity for collective action. The success of nation-building is testified by the fact that, increasingly, citizens regard their Québécois, Catalan or Scots identity as primary, while recognising the reality of the others. This is not because the three societies are becoming different as measured by economic or social indicators. On the contrary, in these respects they have become more like their host nations, illustrating de Tocqueville’s paradox of convergence (Dion 1991); namely that the local society has become the reference point for judgements on social, economic and political issues and the local institutions are the ones accorded primary legitimacy.

The final question must be whether a ‘third way’ between separatism and belonging as an undifferentiated part of the host state, is possible. One answer is that this is already happening. This article has traced the increased differentiation of the three territorial societies, and their governing arrangements as well as their civil societies are already very distinct. On the other hand, there is great unwillingness within the wider host states to recognise this and provide for variable geometry constitutional arrangements. This may be because they are themselves searching for a new national identity to match the contemporary world. Two global societies may find it harder to coexist in the same space than two ethnic groups (Langlois 1991a, b). Unless such a formula can be found, however, minority nations may be forced down the separatist road. This could involve a lapse into an ethnic tribal politics. In that case, they might have to be listened to.
Notes

1 Greenfeld introduces a further distinction, between individualistic and collectivistic forms of civic nationalism.

2 Some authors stretch the concept so far as to meet the voluntarists coming the other way. This concept-stretching and convergence is a familiar problem in social science. Here I try and keep the ideal types distinct, but recognise that individual cases are more complex.

3 A great deal of ink has been spilled in this debate, often by people who insist on reifying the concepts or using them as descriptive categories.

4 For example in the early period of the Lega Lombarda in Italy.

5 This included a magnificent piece of nationalist rhetoric, ‘We are bound to him (Robert the Bruce) for the maintaining of our freedom both by his right and his merits . . . Yet if he should give up what he has begun, seeking to make us or our kingdom subject to the king of England or the English, we should strive at once to drive him out as our enemy and a subverter of his own right and ours . . . for as long as one hundred of us remain alive, we will never on any conditions be subjected to the lordship of the English.’

6 It is not the product of the Peace of Westphalia (1648) pace most international relations scholars. This is true even on the external plane. The only European state which has the same boundaries in 1996 as in 1648 is Portugal, and that has lost an empire which profoundly shaped its internal politics. If we look at the internal construction of the nation-state, this is even more the case. The substantive content of the nation-state is the product of nineteenth-century nation-building.

7 Some exponents of public choice will be infuriated at being bracketed with Thatcher. Yet, however ingenious their mechanisms for deriving social utility functions which might justify the welfare state, they do start from the same point, the detached, self-maximising, rational individual.

8 All three have been given the label of nationalist. Thatcher is a strident British nationalist who, while denying that there is such a thing as society, defends British independence against European encroachment. The ethnic divisions of former Yugoslavia are called nationalist. So are the movements which I am about to discuss.

9 In the early 1990s, two small fringe groups, Settler Watch and English Watch, targeted English in Scotland but made little impact. Settler Watch turned out to be led by a German woman, who was promptly expelled from the Scottish National Party.

10 For example, the series of intellectuals and politicians interviewed by Mercadé (1982).

11 Where we have the exact same ancestral ethnic groups and families as in the west of Scotland but the two communities have signally failed to integrate into a shared identity.

12 This is not because they have high social status. They have the same social profile as native Scots.

13 Until the 1930s, Scottish nationalists usually placed their project in the context of the British empire.

14 Matters are more simple in Scotland than in Quebec. In Scotland, the three main options have been status quo, home rule and independence. In the 1970s, the home rule category was divided into two, corresponding to devolution on the lines of the Labour government’s proposals, and federalism. Later these categories were collapsed but the independence category was divided into two: independence in the European Union; and independence outside the EU. Sometimes this distinction is not made, but the European context is assumed since no major party in Scotland is now against membership. In Quebec, the question is frequently changed as the PQ has modified its policy and vocabulary. I have presented roughly equivalent categories here but the data are indicative rather than definitive. In Catalonia, there are rather few reliable polls on the constitutional issue before the late 1980s but the Institut de Ciències Polítiques now asks a consistent set of questions. For a longer explanation, see Keating (1996).

15 This is comparable to attitudes in northern Norway and is likewise linked to concerns about fishing and marginal agriculture. The SNP hold two Westminster and two European Parliament
seats in this region and have to temper their Euro-enthusiasm a little, advocating the abolition of the Common Fisheries Policy, but still follow a pro-EU line.

16 This message has not reached the Quebec farmers, who are strongly in favour of independence, despite the fact that this would be at enormous cost to them. This again shows that nationalism cannot be reduced simply to rational self-interest.

17 It should be noted that the data in figures 6 and 7 cannot be compared, since they measure different things in different contexts. What is of interest is the development over time indicated in each case.

18 It would be fair to say that the financiers of Wall Street look at Quebec nationalism with blank incomprehension. The best the PQ hopes for is to secure their neutrality.

19 Jordi Pujol, president of the autonomous government described it as 'una presencia internacional, y no digo una política exterior; me gustaría que quedara clara esta precisión' (El Pais 13 December 1993).

20 He added, with characteristic British discretion that, if it did so, there was nothing the courts could do about it. The case, McCormick vs. Lord Advocate, concerned the use of the royal title Elizabeth II in Scotland, when there had been no Elizabeth I.

21 For example, on just about every social and economic indicator, Scotland is now the median British region. On why Scotland does not have to be different to exist, see McCrone 1992. Modern Quebec nationalism arrived with the decline in the old, isolationist Catholic culture. Catalan nationalism has prospered with Catalonia's integration in Europe and the decline of religion and old social institutions.

22 This is the perennial problem for the Scots. Their very moderation and tolerance leads them not to be taken seriously. The British Conservatives refused them any constitutional concession, while pressing ahead for devolution in Northern Ireland. For an account of the long Scottish history of attempts to gain home rule, see Mitchell 1996.

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Stateless nation-building


