NOT ALL FASCISMS ARE CREATED EQUAL: A COMPARATIVE PERSPECTIVE ON THE POLITICS OF NATIONALITY IN INTERWAR GERMANY AND ITALY

NEM TODOS OS FASCISMOS SÃO CRIADOS IGUAIS: UMA PERSPECTIVA COMPARADA DA POLÍTICA DE NACIONALIDADE NA ALEMANHA E NA ITÁLIA DO ENTREGUERRAS

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Abstract: The key objective of this article is to investigate, compare and contrast the specific politics of nationality developed by Fascist Italy and Nazi Germany during the interwar period. More than just highlighting the inherent complexities that characterize the study of nationalisms, this comparative effort aims at shedding light on social, political and institutional dynamics that helped structure and motivate the choices and actions of the European Axis powers.

Keywords: Nationalism; Fascism; Nazism; World War II; Interwar.

Resumo: O principal objetivo deste artigo é investigar, comparar e contrastar as políticas específicas de nacionalidade desenvolvidas pela Itália Fascista e pela Alemanha Nazista durante o entreguerras. Além de destacar as complexidades inerentes que caracterizam o estudo dos nacionalismos, este esforço comparativo visa lançar luz sobre as dinâmicas sociais, políticas e institucionais que ajudaram a estruturar e motivar as escolhas e ações das potências europeias do Eixo.

Palavras-chave: Nacionalismo; Fascismo; Nazismo; Segunda Guerra Mundial; Entreguerras.

The nationalist ideology is one of the most powerful political forces of the modern and contemporary ages, and it has been one of the crucial motivators of political action in the last two centuries. For Barry, "if an ideology is a general way of thinking about the world that has prescriptive implications for politics, then nationalism is an ideology – and by far the most potent ideology in the world" (BARRY, 1991, p. 352). Smith argues that "in the modern world, nationality and nationalism were the basic premises of political life" (SMITH, 1963, p. 140). Therefore, it is not an exaggeration to assert that nationalism, as an ideology, not only played a tremendous part in the constitution and configuration of the current international system – composed mostly by nation-states, that is, political units based and founded on (supposedly) homogeneous communities – but still shapes many of

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the interactions established amongst these actors (such is the case that it is not rare to refer to nationalist wars, nationalist policies, etc.).

The central tenet of the majority of nationalist movements is that each nation ought to have its own state, and each state should be composed of members of a single nation (MULLER, 2008). This stands true for most nationalism¹. What indeed changes is how each nation imagines itself, meaning, how the individuals that compose the nation or the individuals that decide for the nation establish the limits of said nation, that is, the criteria for being a national, a member of such community – in short, the specific characteristics that compose national identity.

No moment in recent history is perhaps more telling of this dynamic than the outset of the Second World War. During the 1930s, the international system witnesses a radicalization of the idea of national self-determination that propelled the consolidation of the system of nation-states less than a century before. In this sense, to say that the history and the international relations of the twentieth century were defined by an expansion and a consolidation of nationalist movements may be an understatement. In several different ways, the Second World War represents a culmination of the Westphalian order, inaugurated almost three hundred years before the start of this conflict. The conflict that started in 1938 (if we assume the Munich Conference as a failure to stop German expansionism) was marked by the overdevelopment of the core concept that founded the modern international order of States: the notion that the populations of Europe (or Earth, for that matter) are divided within specific groups of people related by ancestry, a common history and culture. If 1648 plants the seeds for nationalism, and 1848 sees it blossom, 1938 harvests the fruits of an overzealous gardening of the principles of unity, identity and autonomy. This process, as we know now, was very eloquently translated by fascist movements on strict definitions of what constitutes a people, and with very strong claims of territorial ownership.

World War II was viewed both during its course and after as a fight against fascism. There are several components of fascist ideology, but one crucial component that serves to differentiate fascism from other totalitarianisms is a particularly virulent strain of nationalism [...] Nationalism was perceived as a primary cause of the war; it had provided the pretext for the German occupations of Austria, Czechoslovakia, and Poland that led to the outbreak of war. It was seen as one of the most objectionable aspects of the fascist ideology. While self-determination

remained a legitimate political goal, nationalisms that were xenophobic and expansionist came to be seen as an unacceptable threat to international peace. Nationalism had been previously associated with the desire of people to be free. Fascism associated nationalism with the desire of some people to dominate or dislocate others. This led to a conceptual separation of the 'self-determination of peoples' from nationalism as the legitimate basis for the state (BARKIN AND CRONIN, 1994, p. 122-123).

Nonetheless, not all nationalisms are the same, and not all Fascisms are created equal. Considering the relevance that the definitions of nations (specially the German and Italian ones) assumed in shaping the largest conflict of modern and contemporary history, the main objective of this article is to contrast and compare these key nationalist movements that helped propel the world into a total war in the 1930s. Despite the fact that both German National Socialism and Italian Fascism share similar ideological roots, these movements displayed important differences regarding one of the key components of the nationalist rhetoric, that is, the criteria employed to define who is and who is not a citizen of a specific nation. More than just highlighting the inherent complexities that characterize the study of nationalisms, this comparative effort may also shed light on social, political and institutional dynamics that helped structure and motivate choices and actions of the European Axis powers.

Nationhood and belonging: Civic and ethnic types of nationalism

This section aims at the investigation and classification of the nationalisms of Germany and Italy during the interwar period. This classification will follow the distinction between civic and ethnic types of nationalisms.² The differences between types of nationalism rest on the selected criteria for membership to the national community. While discussing the relationship between nation and race, Passmore states that:

The most inflexible form of racism holds that race is determined biologically. Biological destiny cannot be changed, and assimilation into another nationality is impossible. Indeed, the Nazis believed assimilated Jews to be more dangerous, for they acted secretly. Biological racism also divides peoples into higher and lower, the latter not clearly distinct from higher animals. These 'sub-humans' might be used in the interests of the higher races, or even killed. National identity is not always biologically defined. In the early 20th century educated Europeans usually understood race in terms of history and culture. An individual belonged to a nation if

she or he inhabited the nation's historic territory, spoke the national language, or practiced its religion. This racism is less extreme in that it allows for 'assimilation' by learning the national language or changing one's religion [...] assimilationism rests on racist assumptions: one cannot be a citizen possessed of equal rights unless one conforms to the supposed cultural characteristics of the majority. A genuinely liberal position accepts religious, linguistic, and cultural diversity, and even emotional identification with other states, provided the inhabitant obeys a law equally applicable to all. Even more importantly, all those presumed to have broken the law are treated in the same way. No one is regarded as more likely to have committed a crime because of their ethnic origins. All have the same entitlement to 'due process'. For liberals there are no 'loyalty tests', such as knowledge of the nation's history or support for the national football team (PASSMORE, 2002, p. 108-109).

As summarized by Shulman, the main possible components of civic nationalism (as highlighted by the existing literature) are territory, citizenship, will and consent, political ideology, political institutions and rights. Ethnic nationalism, on its turn, has only two key possible components: ancestry and race. These so-called ascriptive attributes delimit participation to the nation for each type of nationalism (SHULMAN, 2002, p. 559). When a specific state highlights will, consent and political ideology over race and ancestry as the defining characteristic for acceptance within its political community, it is privileging a civic understanding of the nation over an ethnic one. What this indicates, in practice, is the degree of openness of the access to the nation. It is clear that, at least in theory, it is easier to become a member of a civic nation than it is to do the same in an ethnic nation – an individual can always be willing to participate in a state, and to respect and participate in its political institutions; it is impossible, however, to acquire a different race or ancestry in order to fulfill specific citizenship requirements. Table 1 summarizes these two different forms of nationalism concerning the specific content of each type.

Table 1: Alternative Contents of National Identity

Civic	territory citizenship will and consent political ideology political institutions and rights
Ethnic	ancestry race

Source: Adapted from Shulman, 2002, p. 559.

The contents of national identity do not only apply to citizenship requirements. They do have direct implications for key policy issues like immigration and cultural policies. Therefore, the political uses of nationality surpass the definition of the belonging criteria for the nation, and have direct consequences to the ways in which a country decides to deal with its "others" and "outsiders", be those foreigners or immigrants. These implications are summarized on table 2.

In terms of cultural policies, civic nationalisms would either avoid the promotion of ethnic cultures or not encourage assimilation, or it would support the promotion of minority cultures. Regarding immigration policies, civic nations would advance open immigration policies that grant access to all immigrants, notwithstanding their cultural or ethnic background. In sum, civic nationalism's is an "approach in which the state is as culturally neutral as possible and promotes individual, not collective rights" (SHULMAN, 2004, p. 560). The second approach – support and promotion of minority cultures – is one of cultivating multiculturalism. For civic nationalism, both in term of cultural and immigration policies, the demands are mostly of political affiliation.

Ethnic nationalism, on its turn, is almost the mirror image of this description. In terms of cultural policies, the state seeks to promote the dominant ethnic group's culture, and to discourage assimilation³. On the issue of immigration policies, ethnic nationalism advances a very restrictive approach, highlighting a preference for ethnically similar immigrants, most of whom are either displaced nationals or the offspring of such. These preferences are aligned with the understanding that "ethnonationalism draws much of its emotive power from the notion that the members of a nation are part of an extended family, ultimately united by ties of blood" (MULLER, 2008).

Henceforth, these are the indicators I will be looking for while analyzing the nationality policies of interbellum Germany and Italy in order to classify the predominant type of nationalism for these states.

Table 2: National Identity and Key Policy Issues

National	Citizenship Policy	Cultural Policy	Immigration
Identity			Policy
Civic	Jus Soli (the nation is	Promote no ethnic	Open
	defined territorially,	cultures or promote	immigration

	and citizenship is initially granted by birth within a state)	minority ethnic cultures Does not encourage assimilation	
	Participation in legal and political institutions (community of law) Easier process of Naturalization		
Ethnic	Jus Sanguinis (the nation is defined through specific ancestry, and citizenship is granted by birth within a people) Naturalization is not possible if the individual is born outside of the dominant ethnic group	Promote dominant ethnic group's culture Does not encourage assimilation	Restrictive immigration Preference for ethnically similar immigrants

Source: Adapted from Shulman, 2002, p. 561.

Germany: Ethnic Nationalism and the Purification of the Nation

"Citizenship and naturalization policies directly touched on issues that were central to the Nazi project" (NATHANS, 2004, p. 217).

The interwar period in Germany is characterized by a clear intensification of the nationalist discourse, marked by a departure from the somewhat liberal nationality law that governed this country's citizenship policies since 1913: the German Imperial and State Citizenship Law of 22 July 1913. From as early as 1920, the National Socialist German Workers' Party (NSDAP) advanced a platform that was solidly grounded on the three core nationalist goals: unity, identity and autonomy of the German nation⁴. This effort for the definition of the German nation is well-documented in the 24 February 1920 NSDAP Program. This document unveils three central objectives that relate directly to the composition of German nationalism: 1) Concerns with the establishment and restoration of Germany (points 1, 2, and 3); 2) Definition of the belonging criteria (the content of German nationalism) and of German citizenship (points 4, 5, and 6); 3) Distinct prescriptions regarding immigration policies (points 7 and 8). What becomes obvious, already in 1920, is

a propensity towards ethnic nationalism, with a clear emphasis on aspects of ancestry and race for the definition of the legitimate political community, and with very restrictive immigration policy⁵.

The Nazi program of 1920, in whose drafting Hitler played a central role, called for the creation of a racial state. All Germans were to be joined in a Greater Germany. 'Only ethnic Germans [Volksgenossen] can be citizens [Staatsbürger]. Volksgenossen are only those who are of German blood, without regard for confession. Therefore no Jew can be a Volksgenossen'. Those who were not Volksgenossen were to be permitted to live in Germany only as guests. If it proved impossible to feed all the inhabitants of the state [...] then all non-Volksgenossen were to be expelled. 'All immigration of non-Germans is to be prevented. All non-Germans who have immigrated into Germany since the 2nd of August of 1914 must be forced to leave' (NATHANS, 2004, p. 218).6

Despite the fact that the 25-point program is already very clear in terms of the definition of the ideals for German national identity and citizenship, it would take another thirteen years for the NSDAP to be able to implement these measures. Nonetheless, starting from 1933, what is observed in German politics is a slow but constant progression towards the actualization of such principles and the creation of the German racial state, from the definition of what "German", "Aryan" and "Jew" mean to the progressive exclusion of non-Aryans (not only Jews) from the German state and territory. According to Gellately, "Nazi racial policy was codified in a series of laws, ordinances, and decrees which began in 1933 and grew in scope with the increasingly radical approach adopted by the regime" (GELLATELY, 1990, p. 159).

In April 7, 1933, the first significant piece of legislation that highlights ethnic characteristics of German citizenship policies is promulgated⁷. The Law for the Restoration of the Professional Civil Service excludes any non-Aryan individual from holding an official position within German civil service. The only exception made to this rule regards individuals who fought for Germany or its allies in World War I, "or whose fathers or sons fell in the World War" (paragraph 3, sections 1 and 2). Despite this clear exclusion, it is important to notice the lack of definition regarding the category of "Aryan". Regarding this piece of legislation, Gellately highlights that:

Diemut Majer notes, in a book on 'racially foreign people' (Fremdvolkische) in the legal and administrative practice of the Third

Reich, that the very first piece of anti-Jewish legislation-the law to 'restore' the civil service of early 1933-was to apply to people with 'non-Aryan', rather than simply Jewish, origins. From the very outset, she argues, given the lack of precision of 'Aryan' and 'non-Aryan' (neither was defined), the racism of the regime could spread beyond the Jews to include many others who were considered 'undesirable'. Inside Germany there was a massive sterilization programme aimed at those suffering from 'hereditary diseases', as well as a euthanasia programme and efforts designed to solve the 'gypsy problem'; even the few blacks born in the Rhineland as a result of relationships with the French occupation troops in 1923 were not overlooked.' [...] Given that the Nazi doctrines on race condemned most of these people to a status of racial inferiority, there was a determination to keep them separate from the German people, and above all to prevent any 'racial mixing' (GELLATELY, 1990, p. 215-216).

The simultaneous preoccupation with race combined with a lacking specification of what consists such racial type, as well as the concern with the definition of the German nation, remained evident and relevant in the decree of July 26, 1933, on the repeal of naturalization and adjucation of German citizenship. Paragraph one of this document states clearly that the criteria for consideration of the desirability of naturalization processes is in accordance with "racial national [voelkisch-national] principles", with explicit exclusion of the Eastern Jews. Nonetheless, such legislation still lacks a clear definition of what it means to be "German", "Aryan", or even "Jew". This same trend continues in the Law Concerning the Armed Forces of May 21, 1935. This specific law advances the prerequisite of "Aryan descent" in order to serve in the military. Once again, there is discrimination based on racial status without a clear definition for racial belonging. In this sense, from 1933 to 1935, we have a period that extends throughout more than two years in which important legislation that seeks to restrict and define German citizenship on the basis of race without a clear definition of race.

This issue would finally be addressed in 1935, with the promulgation of the Nuremberg Racial Laws (the Reich Citizenship Law and the Law for the Safeguard of German Blood and German Honor) of September 15, 1935. The Reich Citizenship Law is probably the most important one as it clearly defines the understanding of who is a citizen of the Reich: "A citizen of the Reich is only that subject who is German of kindred blood. [...] Only the citizen of the Reich enjoys full political rights". The definition of "Jew", in a sense complimentary to the definition of "German" and of equal importance to the racial legislation that was being advanced since 1933, comes in November 14, 1935, with the

publication of the First Regulation to the Reich Citizenship Law. According to paragraph 4, "A Jew cannot be a citizen of the Reich", and according to paragraph 5:

A Jew is anyone who descended from at least three grandparents who were fully Jewish by race. [...] A Jew is also anyone who descended from two fully Jewish grandparents, if: (a) he belonged to the Jewish religious community at the time this law was issued or joined the community later; (b) he was married to a Jewish person at the time the law was issued or married one subsequently; (c) he is the offspring from a marriage with a Jew; (d) he is the offspring of an extramarital relationship with a Jew (OFFICE Of The United States Chief Counsel For Prosecution Of Axis Criminality, 1946, v. 4, p. 08-09). 9

While the Reich Citizenship Law relates mostly to the circumscription of the belonging criteria for the German nation, the other Nuremberg Law, the Law for the Safeguard of German Blood and German Honor relays a concern with the "purity" of the Aryan blood, by outlawing both interracial marriage and intercourse. In this sense,

'Race defilement' (Rassenschande), forbidden (extramarital) sexual intercourse between Jews and 'non-Jews', was declared a crime according to the Nuremberg Laws of 1935. Even 'friendly' or social relations with Jews constituted an area of potential 'criminality', but not officially a 'Behaviour friendly to the Jews' specific crime as such. (judenfreundliches Verhalten) was a term of abuse and a catch-all accusation that could be levelled at persons who had uttered a mild disagreement with some aspect of the racial policies, or had otherwise given reason for suspicion that they did not accept the letter or spirit of Nazi anti-Semitism. Such people were also termed 'friends of the Jews' (Judenfreunde) or 'slaves of the Jews' (Judenknechte), although they might simply have retained purely economic, instrumental contacts with them. The Gestapo was exceptionally sensitive, and ready to act on any information that helped to enforce racial/sexual segregation (GELLATELY, 1990, p. 160).

For Gellately, the Nuremberg Law for the Safeguard of German Blood and German Honor translates one of the main concerns of National Socialism – racial mixing – as expressed both in Hitler's *Mein Kampf* and in the NSDAP's 25-point program:

Personal or sexual relationships across the ethnic boundary were immediately placed under the greatest pressure, since it represented the vital area in which the dreaded 'racial mixing' occurred, claimed by Hitler's Mein Kampf to be the single most important cause for the fall of civilizations. Jewish men caught violating the Nuremberg Laws were to be tried for 'an attack on German blood', while 'German men were

brought to court for 'treason against their own blood' (GELLATELY, 1990, p. 172).

By finally defining both the belonging criteria for the German nation and expressing preoccupation with the maintenance of the purity of the Aryan blood, the Nuremberg Laws of 1935 fulfills the original goals of the NSDAP program published 15 years before. However, what is more relevant to the present study is that these laws not only culminate the 15-year process of racial determination and discrimination in interwar Germany, consolidating a de facto racial state, but also that they display the pronounced inclination that German nationalism in the interwar period had towards ethnic definitions of the nation.

This legislation, combined with its predecessors and its successors, managed to define the criteria for belonging to the German nation and participating in the German state to ascriptive characteristics (German ancestry and Aryan blood). It also advanced social, cultural and immigration policies that were highly restrictive and discriminatory, highlighting a deep concern with the purity of the nation by the avoidance of assimilation, immigration, and even expulsion¹⁰. The radical ideology of racial purification that informed these policies resulted even in the de-assimilation of individuals and groups that were not aware anymore of belonging to ethnic minorities (BOCHMANN, 2003, p. 132).

Here, it is important to highlight that despite of the emphasis placed on the Jewish population other minorities also faced similar discrimination. As stressed throughout this text, the main concern was with the purity of the Aryan blood, translated into a rigid separation between Aryans and non-Aryans. This preoccupation became very visible in the case of the Jewish population, but it did not overlook other minorities, such as the Polish, the Sorbs, the Roma and the Sinti, as well as individuals of African descent. For Passmore:

Historians have rightly pointed to the fact that during the Nazis' rise to power, as part of their bid for conservative support, the Jews were only one of several enemies attacked by the Nazis (others included the Poles, Catholics, Communists, and socialists), and that since the Jews were perceived to pose no immediate threat, they were not usually the primary target of Nazis at this time (PASSMORE, 2002, p. 112).

Because the overall goal of the nationalist movement in Germany was to achieve racial homogeneity, the treatment of minorities within German territory regarding assimilation, migration and cultural freedom varied in accordance to the degree of "racial"

similarity" of each group as perceived by the Nazi Leadership. A good example is the difference in treatment of four minority groups living within the German Reich during the interwar period: Frisian, Danes, Sorbs and Poles:

Whereas the Frisians and Danes, as Germanic peoples, did not suffer from any real persecution, the Slavic Poles and Sorbs were categorized as less 'racially valuable' from the outset, and therefore became the victims of discrimination and oppression. [...] Sorbs living in Saxony and Prussia were harassed as early as 1933, their newspapers and democratic organizations banned, and their best-known leaders arrested [...] Domowina [cultural umbrella organization for Sorbian Associations] was banned in 1937; Sorbian libraries, archives and folklore collections were confiscated and destroyed; teachers and priests were deported, the spokesmen of the Sorbs were arrested, and some of them were murdered in concentration camps. In 1938, the use of Sorbian in churches was forbidden and the last vestiges of Sorbian-language schooling were eliminated (BOCHMANN, 2003, p. 132).

This policy is stated clearly in a memorandum issued by the Racial Political Office of the Nazi Party in November 1939 that advanced the goals of assimilation of ethnically similar groups into the German nation, expulsion of all non-Aryans and further geographical expansion of the German presence. According to Gellately,

[...] the efforts of the Gestapo in racial affairs, far from diminishing with the isolation, emigration, and/or deportation of the Jews to the east, actually had to be stepped up dramatically. Even before the outbreak of war in 1939, the large number of foreign workers in the country and their relations both to their employers and to the people at large had to be policed. In 1938, nearly 100,000 Poles worked in Germany, mostly in agriculture. [...] An indication of the kinds of things in store for the Poles, whether inside Germany or in the occupied territories, can be seen in a memorandum of the Racial Political Office of the Nazi Party, written by Dr E. Wetzel and Dr G. Hecht in November 1939. The aims were 'first, the complete and final Germanization of the [ethnic] groups of appropriate composition; second, the removal of all foreign elements not to be Germanized; third, a new settlement by Germans. The long-term goal must be the complete destruction of the Polish people' (GELLATELY, 1990, p. 217).

Considering all these points, it is fair to state that during the interbellum official policies regarding citizenship, immigration, and assimilation in Germany defined state-level German nationalism in clear ethnic terms. In sum, it resembles very much the summary of ethnic cultural and immigration policies provided in table 1: it promoted the

dominant ethnic group's culture, it did not encourage assimilation, and it advanced a restrictive immigration policy with a clear preference for ethnically similar immigrants.

Table 3: Legal References and List of Documents Relating to the establishment of the Nazi Regime, with a focus on citizenship issues.

Description	Date
German Imperial and State Law	22 July 1913
Hitler's speech.	12 April 1922
The Program of the NSDAP.	24 February 1925
Law for the reestablishment of the Professional Civil Service.	7 April 1933
Law relating to admission of profession of Patent-Agent and Lawyer.	22 April 1933
Law on formation of the Student Organization at Scientific	22 April 1933
Universities	
Law against overcrowding of German schools and Higher Institutions.	25 April 1933
Law relating to admission of Tax Advisors.	6 May 1933
Executory decree for law about repeal of Naturalization and	26 July 1933
Adjudication of German Citizenship.	
Denaturalization Law.	14 July 1933
Law Regarding Expulsion from the Reich	23 March 1934
Editorial control law.	4 October 1933
Law concerning armed forces.	21 May 1935
General Decree on establishment of separate Jewish schools.	10 September 1935
Law for protection of German blood and German honor.	15 September 1935
Reich Citizenship Law.	15 September 1935
First regulation to the Reich Citizenship Law.	14 November 1935
Law governing elections to Reichstag.	7 March 1936
Decree for reporting of Jewish owned property.	26 April 1938
Fourth decree relative to Reich Citizen Law.	25 July 1938
Second decree allotting to Implementation of Law on change of first	17 August 1938
and family names.	
Fifth decree to law relating to Reich Citizenship.	27 September 1938
Decree on exclusion of Jews from German economic life.	12 November 1938
Stenographic report of the meeting on The Jewish Question, under the Chairmanship of Field marshal Goering.	12 November 1938
Police regulation concerning appearance of Jews in public.	28 November 1938
Order concerning utilization of Jewish property.	3 December 1938
Hitler's speech to the Reichstag.	30 January 1939
Law concerning Jewish tenants.	30 April 1939
Tenth decree relating to Reich Citizenship Law.	4 July 1939

Sources: Nazi Conspiracy and Aggression, vol.1, p. 307-309, and Schleunes, 1990, p. 92-132.

"Everything for the state, nothing against the state, nothing outside the state" – Giovanni Gentili (apud GRANT, 2003, p. 21).

As exposed in the previous section, the evolution of German nationalism and citizenship under Nazi rule followed a progressive (even if slow) path of definition and clarification that was characterized by a strong emphasis on ethnic elements of nationhood. The Italian case does not present a similarly clear path. Whereas German nationalism assumed a heavily ethnic denotation during the interwar years, with a progressive restriction of German identity to the ascriptive criteria of race and ancestry, and a strong discrimination program targeting the Jews and other minorities, the movement of national redefinition in Fascist Italy was not only less straightforward, it was also more ambiguous and ambivalent in terms of proposing a clear-cut definition of the membership criteria for Italian citizenship¹¹.

In Germany, clear propositions for the restriction of German nationality to criteria of race and ancestry (with a very strong concern for the "purification of the German blood") were being advanced since 1925 and implemented since 1933, in strong opposition to the liberal tradition of the Weimar Republic. This represented a distinct effort to retire the more inclusive Imperial citizenship laws in favor of a more restricted definition of the German nation. In Italy, however, the rise of Fascism to power had less immediate consequences for the Italian membership norms.

As observed in Germany, Italy also goes through an intensification of the nationalist discourse during the interwar years, but instead of having an excessive preoccupation with the ethnic content of the country's national identity, Italian Fascism tended to highlight the institutional and political dimension of national membership¹². This inclination is clear in the "Doctrine of Fascism", published in 1932, a document in which Mussolini articulates his political views. An examination of the "Doctrine" helps us clarify the fascist comprehension of the Italian nation as an extreme form of civic-totalitarian nationalism. The notion of civic-totalitarian nationalism is one in which the membership criteria still highlight political variables such as territory, citizenship, will and consent, political ideology, political institutions and rights. However, instead of focusing on individual

participation, the focus is on the collectivity¹³. Mussolini clearly emphasizes the relevance of the institutional framework of the State in the definition of the nation, and the relevance of history and tradition in this process, while downplaying ethnic aspects of the formation of the nation. For him, a nation is "not a race, not a geographically defined region, but a people, historically perpetuating itself" ¹⁴. Moreover, he goes on to say that "It is not the nation that generates the State [...] Rather, it is the State which creates the nation, conferring volition and therefore real life on a people made aware of their moral unity."

Insofar as it concerns the ideal-types previously defined in this investigation, Mussolini's description of Fascism in regards to the composition of the nation highlights several of the civic components of nationality, while dismissing the key ethnic element that many nationalists bring forward for the definition of ethnic nation: ancestry. This civic understanding of the State forming the nation, however, was marked by the clear undertone of totalitarianism, which meant that in order to be considered a citizen in Fascist Italy one had to be integrated in the institutional framework advanced by the Fascist State¹⁵. According to Gentile:

From its very beginning fascism demanded a monopoly of the national myth and to be the sole legitimate movement to represent the nation, that is, the only party entitled to rule the country and to bring the nation-State under control. Any other movement, which did not subject itself to fascism and did not adhere to its myths, values, and norms, was considered an enemy of the nation. In this way, the liberal nationalist ideal of the nation-State as a homeland for all Italians without ideological, religious, or ethnic discrimination was rejected and replaced by the ideal of a totalitarian State, a State, in other word, where only those who were fascist were considered true Italians and could be granted complete citizenship. Those who did not swear allegiance to the fascist State ceased to be a part of the Italian nation. They were treated as traitors of the nation and banned from public life (GENTILE, 2003, p. 07). ¹⁶

In this sense, the fascist regime advanced a new conception of citizenship that fused the public and private self in the state (BEREZIN, 1997, p. 41). Interestingly enough, this was done without modification of the Citizenship Law of 1912, the last legislation to establish clear membership criteria to acquisition of Italian citizenship¹⁷. Moreover, because of this centrality of the State in the process of definition of the Italian national identity, and furthermore, because of the intrinsic association between the Italian State and the Fascist Movement¹⁸, Italian Fascists were able to claim exclusive control of the

definition of Italian national identity. In practice, this meant that underlying any individual's participation in the Italian nation (and therefore her political rights) was her prior engagement to the *Partito Nazionale Fascista* (PNF, the National Fascist Party). As Gentilli summarizes it, the Fascist movement managed to become "the sole representative of 'Italianness' (Italianità)" (GENTILLI, 2003, p. 146). During Fascist rule in Italy, citizenship rights were engulfed and restricted by ideological affiliation.

In Italy, these definitions of nationhood and of national community also translated into actual policies. However, different from what happened in Germany, where highly ethnic definitions of national identity resulted in an almost zero tolerance attitude towards assimilation processes, the Italian government implemented severe assimilation dynamics. According to Bochmann:

[...] with regard to the treatment of minorities, the Fascist government of Mussolini merely continued certain tendencies introduced by the bourgeois Italian state only a few years after unification. What was new was the severity and universality in dealing with all minorities that were either considered a threat to newly drawn borders and/or were determined to resist the pressures of assimilation. What was also new was the ideological justification and instrumentalization of the policy towards minorities. Mussolini wanted to establish his empire on the basis of a perfect linguistic and cultural unity of the Italian nation, and this in a situation where the majority of the population was not fluent in standard Italian and the dialects and minority languages were its most important means of communication. The battle was therefore not only waged against minorities with their languages and cultures but also against Italian dialects, whose use in public and even their mention in the press was forbidden by law (BOCHMANN, 2003, p. 130).

Therefore, in its search for national unity the fascist movement implemented a strong assimilation policy through the suppression of foreign languages and even domestic dialects that aimed at the strengthening of Italian language as the agglutinating factor of the Italian nation. In opposition to what happened in Germany, this movement did not translate into the expulsion or elimination of minorities, but instead in a forced assimilation process that aimed at an Italianization of minorities. As mentioned before, this stands in opposition to what was happening in Germany during the same time: already in 1933 the NSDAP was promulgating several new pieces of legislation that altered the German Imperial and State Citizenship Law of 1913 in order to include clear and intentional exclusions based on ethnic criteria.

However, this disregard for the idea of race as a key defining component of the Italian nation and state underwent a revision in the final years of the interwar period. In 1938, under an increased influence form Germany¹⁹, the Fascist Party published the Manifesto of Race, in which it recognizes race as a "purely biological concept", and that underlying different nations are different races²⁰. This document brought about not only changes in the conception of the Italian Nation, but it also established, for the first time, conditions for denationalization, by singling out Jews as not belonging to the Italian race and, therefore, to the Italian nation.

Though motivated by political opportunism, fascism's embrace of racism was facilitated by a range of factors, including the increasing importance of imperialist ideology (racial vocabulary had crept into the antimiscegenation laws in Ethiopia), the presence of vocal anti-Semitic minorities in the Fascist Party and Catholic Church, an anti-Jewish press campaign carried on in 1936, and Mussolini's fears that Hitler was emerging as the true figurehead of international fascism. This said, the manifesto was inconsistent with Mussolini's prior positions (which had been unambiguously antiracist) as well as with prevailing Italian political traditions (SCHNAPP, 2000, p. 172).

Despite this clear shift towards a more ethnic definition of Italian nationality, the Manifesto failed to have deeper repercussions (once again in opposition to its German counterpart). According to Smith, "as with all fascist legislation, these laws were ineffectively enforced, especially as many people, fascists such as Balbo²¹ included, were shocked by such unscientific, shameless imitation of the barbarian Nazis" (SMITH, 1997, p. 396).

What becomes clear from this investigation is that the fascist re-imagination of the Italian nation lacked the resolution, depth and focus observed in the German movement. A panoramic perspective of the interwar period in Italy produces an ambiguous picture of the fascist project in terms of national membership. Between a corporatist civism and a hesitant racialism, the membership criteria for the Italian nation lacked the certainty and the sharp distinctions of German nationhood.

Table 4: Legal References and List of Documents Relating to the establishment of the Fascist Regime, with a focus on citizenship issues.

Description	Date
Statuto Albertino	4 March 1848
Citizenship Law	13 June 1912
Plataform of the Fasci di Combatimento (Combat Leagues)	6 June 1919
Postulates of the Fascist Program	May 1920
Program of the National Fascist Party	27 December 1921
The Labor Charter	April 1927
Foundations and Doctrine of Fascism	1932
Manifesto of Race	1938
The School Charter	February 1939
Critique of the Manifesto of Race	1941-1942
New Revised Draft of the Manifesto of Race	25 April 1942

Sources: Schnapp, 2000, and Carnegie Endowment for International Peace, 1929.

In sum, Italian citizenship during the interwar period is characterized by a discernible ambiguity in terms of its content. Formally, it shifts from a civic liberal understanding of the nation (as first expressed in the Citizenship Law of 1912) into a civic-totalitarian (with cultural undertones) view of the nation from 1923 to 1937 (a period during which there was a strong emphasis on the role of political ideology to the definition of the membership criteria), assuming an ethnic character only in 1938 (the immediate pre-war year). In this sense, it is fair to state that it varied more in form (from civic-liberal to civic-totalitarian) than in content (remember that the racial laws of 1938 were highly contested even inside the Fascist Party). This stands in sharp contrast with the variation observed in German nationalism during the same period, which presents a de facto change from more inclusive to more atavic principles for national membership:

Fascist Italy, by contrast, though it promoted the growth of *la razza*, understood in cultural-historical terms, remained little touched by the northern European and American vogue for biological purification. This difference rested upon cultural tradition. The German Right had traditionally been *völkisch*, devoted to the defense of a biological 'people' threatened by foreign impurities, socialist division, and bourgeois softness. The new Italian nationalism was less biological and more political (PAXTON, 2004, p. 37).

This same distinction is also true for laws and policies regarding immigration and the treatment of minorities. While the German government acted systematically in order to exclude and persecute non-Aryans (as made obvious by the treatment of its Jewish population), the Italian Fascists not only seemed hesitant to adopt openly racist policies, but they also did not seek to exclude minorities from participating in the institutional framework of the State²² and welcomed, for a great part of the interwar period, refugees from Nazi persecution.

Final considerations

As it becomes clear from the comparison outlined in the previous sections of the paper, even though German Nazism and Italian Fascism share a great deal of similar characteristics, they differ very much in their core criteria for national membership, as well as in the policies outlined and implemented following these definitions of the German and Italian nations.

German Nazism developed a steady and progressive march towards the creations and consolidation of an ethnic state, were the nation is imagined to be pre-political, and composed by individuals who are thought to share equal ancestry. This nation actually articulates and justifies the existence and maintenance of the State, whose sole purpose is to serve and implement the goals of the nation. The ethnic character of German nationalism is strongly stated not only in the citizenship policies of the Reich, but also on programs dealing with national minorities and immigration issues. All these institutional changes had a very clear goal: the constitution of a homogeneous Aryan state through the purge of non-Aryans in general.

Italian Fascism, on its turn, adopts a different route: here, the State creates the nation, and the membership criteria is clearly political (at least until 1938, as stated before). In Fascist Italy, the State created the nation, whose purpose was to serve and implement the goals of the Fascist State. This is the reason why loyalty to the Fascist Party was so relevant, and why racial persecution in Italy during the interwar period was not as widespread or intense as the one witnessed in Germany during the same period. More so, the shifting of the Italian nationhood criteria is marked by a certain ambiguity, lacking the certainty and resolution observed in the German case.

Understanding these two distinct approaches to national definition may illuminate several dynamics that helped ground Second World War, such as territorial expansionism and the persecution of minorities, as well as the different international repercussions that German Nazism and Italian Fascism provoked. More so, it can point towards a better comprehension of post-war dynamics of resistance to and persistence of some of these traits in European politics.

Additionally, the contrast explored in this article also highlights an internationalization of the dynamics of domestic politics, in the sense that specific decisions, policies and actions that relate to the strict definition of the domestic space of each State end up having important international reflections and consequences.

Following this insight, one hypothesis for future investigation is advanced here: that there is a crucial difference between the perceptions of threat within the international system provoked by diverse types of nationalism. Civic nationalism should incite less concern than ethnic nationalism, mostly because policy-makers may associate the exclusivist character of ethnic nationalism with the possibility of aggressive international behavior. In sum, the aggravating treatment of "domestic others" may signal how an actor would threat their "foreign others". Internal expansion and xenophobia can easily signal a desire for external dominations. In this sense, we should be able to identify that the different approaches developed towards their citizenship criteria also had a crucial impact on how Italy and Germany were perceived in the international system during the interwar period.

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Endnotes

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¹ Despite this common definition of nationalism, it is important to highlight that there are cases of nationalist movements that do not necessarily seek their own state. Some nationalism are satisfied with achieving political autonomy within the framework of a multinational state – such is the case of Norway, Spain, India and Belgium, for example. This does not mean that such processes of national autonomy are easy or peaceful.

On the opposite, they can be quite conflictual. The difference, however, is that its final goal is not the creation of a new state, but the conquest of autonomy.

- ² Despite the use of the terms civic and ethnic nationalism is this work, it is important to stress that whenever these different classifications for nationalism arise during the course of the argument, they are stressing the predominant characteristics for this phenomenon in the historical moment and particular case that are being discussed. Therefore, when it is affirmed that German nationalism during the interwar period was an example of ethnic nationalism, what is being stated is that, especially for the period between 1933 and 1938, the political use of national identity by the German Reich emphasized highly atavistic traits for membership in the German nation. This is different from saying that it was purely ethnic. Most states present all of the different types of nationalisms in varying levels. What changes, from time to time, is the salience of each of these characteristics, as well as the political relevance attributed to them.
- ³ The reasons for discouraging assimilation in the case of ethnic nationalism are of course different from the ones for civic nationalism. While for the former, assimilation simply does not make sense, since minorities will never be able to partake in the nation, the latter considers it unnecessary the lack of the necessity of cultural unity of the nation translates into a disregard for assimilation policies.
- ⁴ Table 3 lists 28 key documents for this process, published between 1920 and 1938. However, it is important to highlight that there were more than 400 pieces of legislation regarding racial politics published during this period in Germany (SCHLEUNES, 1990, p. 109-110).
- ⁵ Despite the clear ethnic inclination of the NSDAP program, it is important to highlight that there is one important definition that is closely related to a cultural understanding of the nation: point 24 emphasizes the importance of freedom of religion for all religious denominations ("as long as they do not oppose the moral senses of the Germanic race"), while advocating "the standpoint of a positive Christianity" and combating "the Jewish-materialistic spirit" (NATIONAL SOCIALIST PARTY, 1920).
- ⁶ The quotes included in Nathans' citation are originally from the NSDAP Program of 24 February 1920.
- ⁷ "The four April Laws were merely the first of some 400 pieces of anti-Jew legislation promulgated by the Nazis between 1933 and 1939. They were the first steps in a legal attack which reached its peak in late 1935" (SCHLEUNES, 1990, p. 109-110).
- ⁸ "A striking feature of Nazi Jewish policy after the April boycott [1933] was its lack of coordination. Indeed, until late 1938, one cannot speak of a single Jewish policy. There was, to be sure, the official anti-Jewish line of the regime, propagated by Goebbels' Propaganda Ministry and in Hitler's speeches, which masked the inconsistencies and reverses in a multitude of Jewish Policies. Behind the façade one notes policies that were pursued without the sanction and oftentimes without the knowledge of the party's central authorities. What appeared to outside observers as steady Nazi pressure against Jews on nearly all fronts, was actually the product of strain and disagreement within the Nazi movement" (SCHLEUNES, 1990, p. 92).
- ⁹ It is interesting to note the emergence, once again, of a cultural criterion for the racial definition with regards to point (a) as the relevance of belonging to a religious community.
- ¹⁰ "The biological premises of Nazi anti-Semitism prescribed a specific approach to anti-Jewish legislation. It would have been reasonable to predict in 1932 that the first anti-Jewish law of a Nazi regime would be designed to halt the process of biological assimilation and perhaps end the immigration of the Ostjude, or even require his expulsion. [...] It is not surprising, therefore, that the first concrete proposals for anti-Jewish legislation were aimed at de-assimilating the Jew from the German" (SCHLEUNES, 1990, p. 101).
- ¹¹ This difference is also noticeable in other areas of comparison between Nazism and Fascism policies. As Smith states: "On paper the two ideologies may have looked alike, but the practice fascism lacked the ruthlessness, the organizing capacity and willingness to take theory to its logical extreme" (SMITH, 1997, p. 390).
- ¹² Nonetheless, it must be noted that this process is marked by a consistent incoherence from the leadership of the Fascist party (especially Mussolini): there is a constant back and forth movement on the role and relevance of race within Italian Fascism. In 1921, in a speech proclaimed in Bologna, Mussolini declares that "Fascism was born... out of a profound, perennial need of this our Aryan and Mediterranean race" (NEOCLEOUS, 1997, p. 35). In 1933 (LUDWIG, 1933, p. 69) he expresses despise for Nazi biologicism (see endnote 13). In the later years of the interwar period, due to heavy influence of Garman Nazism, the Fascist Party in Italy pushes for a racial understanding of national membership with the publication of the Manifesto of Race in 1938, abandoning civic/cultural definitions of Italian nationality.
- ¹³ Mussolini himself states in the Doctrine that Fascism is "opposed to all individualistic abstractions [...] and stresses the importance of the State and accepts the individual only in so far as his interests coincide with those of the State" (MUSSOLINI, 2012).

¹⁴ In a footnote to this passage, Mussolini cites a series of conversations he had with Emil Ludwig, in which he states that "Race! It is a feeling, not a reality; ninety-five percent, at least, is a feeling." (LUDWIG, 1933, p. 69), and that "Nothing will ever make me believe that biologically pure races can be shown to exist today. Amusingly enough, not one of those who have proclaimed the 'nobility' of the Teutonic race was himself a Teuton. [...] No such doctrine will ever find wide acceptance here in Italy. [...] National pride has no need of the delirium of race. [...] Anti-Semitism does not exist in Italy. Italians of Jewish birth have shown themselves good citizens" (LUDWIG, 1933, p. 70).

¹⁵ In the case of Fascist Italy, these civic components are always understood within a totalitarian and corporatist framework, which weakens the element of individual choice, of course. Nonetheless, it is important to highlight that the definition of the nation for Mussolini (at least in this moment) is political and institutional – very civic characteristics – with a strong dismissal of ethnic components (see endnote 11).

¹⁶ It should be noted that in the scheme of civic-totalitarian nationalism even the discrimination between citizens and non-citizens is based on institutional participation, rather than on race or creed.

¹⁷ The Italian Citizenship Law of 1912 and the German Imperial and State Citizenship Law of 1913 are very similar in content: both include a mix of civic and ethnic characteristics as pre-requisites for citizenship at birth (territory and/or ancestry), as well as highly inclusive civic requirements for naturalization (most of which focus on service to the state and/or residency within the territory for a determined number of years) (ITALY, 1912, p.; GERMANY, 1913).

¹⁸ "One of the problems that the emergent fascist movement faced in Italy was the absence of a genuine Italian national myth, despite the movement's own invocation of the myth of the nation. [...] the nation had to be *created*, and the only force which could create it was the state" (NEOCLEOUS, 1997, p. 23-24).

¹⁹ "Another symptom of Mussolini's aberrant behavior was his imitation of the German racial laws. According to the 1931 figures, there were only fifty thousand Jews in Italy, though others were later welcomed as refugees from Hitler's persecution. Mussolini had earlier boasted that there was no racial problem in Italy. The article on anti-Semitism in the Encyclopedia had even been written by a Jew. Some fascist *gerarchi* were Jews. Mussolini in the early 1930s talked despairingly of Hitler's anti-Semitism, for it was a sore point that German racial doctrines also excluded Italians from the *Herrenvolk*. Then came conquest in Africa which led to unfortunate miscegenation and a new sense of race consciousness. No doubt Mussolini's journey to Germany in 1937 accentuated this trend. On Hitler's return visit in May 1938 the two countries agreed to harmonize their internal as well as external policy. In July every newspaper had to print a declaration by well-known university professors who suddenly discovered that Italians were Nordic Aryans; and it was warned people against the 'peril' from Jews who were only one-tenth of 1 percent of the population. Mussolini in private expressed the hope that the resultant persecution would make Italians more hated abroad" (SMITH, 1997, p. 396).

²⁰ This Manifesto was heavily criticized within the Fascist Party due to its inconsistencies (e.g., it states that nations are primarily founded on cultural elements such as linguistic and historical traits, but subsequently affirms that races are the underlying source of nations). The result of these debates was first a critique of the Manifesto, and later on a revised draft, published on 1942 (SCHNAPP, 2000, p. 172).

²¹ Italo Balbo was one of the leading fascist leaders that opposed not only Mussolini's racial laws, but also Italy's alliance with Nazi Germany (DI SCALA, 2004, p. 234).

²² As Smith describes, several officers within the fascist hierarchy were Jews (SMITH, 1997, 396).

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