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# Citizenship in Early Modern China

*A Commentary to Maarten Prak's Citizens without Nations*

Christine Moll-Murata

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## Abstract

This article comments on the discussion of pre-modern Chinese citizenship in Maarten Prak's *Citizens without Nations*. It confirms the conclusion drawn by Prak that many elements of European citizenship were also present in China, but raises questions about two aspects: the presumed absence of formal citizenship in China and the position of Chinese cities within a national administrative structure. On the first of these points the article shows that formal civilian status implied rights such as the protection of person and property in China as well as in Europe. On the second issue, it demonstrates that the authorities in Chinese cities, especially in periods when state power was relatively weak, depended on cooperation with self-organized local institutions, and that these also included organizations for self-defense.

Maarten Prak's study on citizenship in the early modern period has been warmly received by the academic audience, as the growing number of relevant reviews shows.<sup>1</sup> Since one chapter is dedicated to China and the Middle East, this comment will respond to some of his points on citizenship in China.

There are two main arguments in this book, as the author explains. The first is that citizens could be prominent participants in public life, and that the role of citizens was not settled once and for all, but contested throughout the period of observation, from the high Middle Ages through the French Revolution. The second point is that the French Revolution strengthened national governments rather than citizen autonomy. Moreover, the author reconsiders Max Weber's claim that cit-

<sup>1</sup> See, for instance, the review dossier in the *International Review of Social History* 65 (2020). For Maarten Prak's chapter on China, the review of R. Bin Wong in this dossier, 'Citizenship in Chinese and global history before and after the 1890s', *IRSH* 65 (2020) 125-133, is of particular relevance.

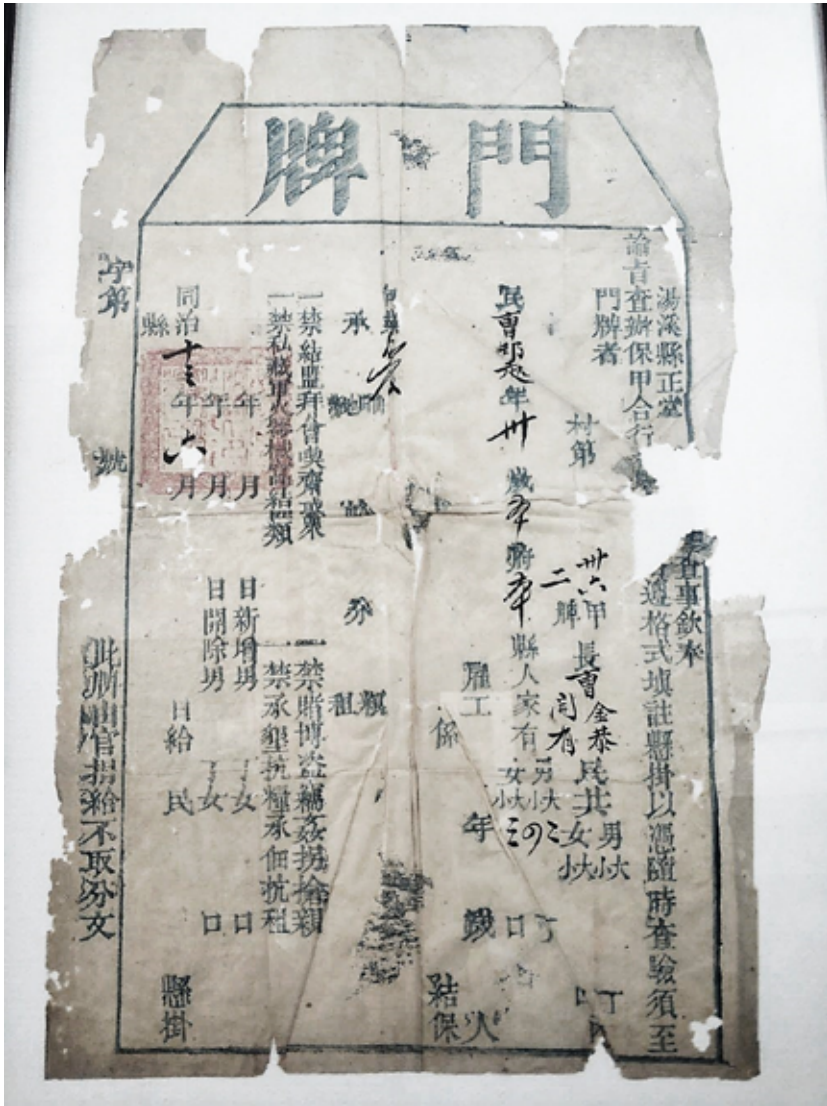


Illustration 1 Qing dynasty door plate (1874) (source: see note 2).

izens' autonomy caused the dominance of Europe over the rest of the world. The challenge to Weber's ideas (mainly in his work *Economy and Society*) consists of two points: Europe was less unique than Weber was aware of, and this assumed uniqueness of European cities and citizenship did not per se result in the economic and social advantages of Europe over the rest of the world.

In a sophisticated deliberation on the definitions of citizenship, the author cites Engin Isin's compact formulation that citizenship is 'the right to claim rights' (6) provided by the state or any other public authority. For his own definition, Prak draws on Charles Tilly and Richard Bellamy in stressing the dynamic nature of citizenship which he understands as a set of processes or transactions in communities that cover political, social and moral dimensions. The concept of *formal* citizenship is further elaborated as documented membership, material property and permanent residence, avouched by guarantors and notaries, that conveyed duties and the aforementioned rights to political participation, and access to guilds. The author holds that conditions for belonging, as well as the rights and obligations, changed over time and in space, but have resembled each other in the European context.

Yet this work attempts to transcend the European historical experience with the aim 'to identify variations in order to understand the emergence and impact of citizenship practice'. The avowed intention is not to commit the same essentializing errors as Max Weber, who thought that the quality of citizenship made Europe unique and caused the rise of modernity in Europe before Asia. Even so, Maarten Prak still intends to demonstrate 'that the history of citizenship can contribute a significant angle to the debate about the differential development' (18). The intention is not the same as that of Max Weber, who utilized his knowledge of other world regions in order to explain the reasons for European superiority. Nevertheless, at its core, methodically this shares the same comparative approach.

Similar to the approach of Max Weber, Maarten Prak assumes that previous to the twentieth century there was no formal citizenship in Asia, and therefore only civilian, political, economic and military aspects can really be compared.

For an evaluative consideration of this point, I suggest looking at the historically documented evidence of individuals belonging to specific spatial communities. For example, the form sheet displayed above is part of a *menpai* or door plate. These papers were meant to be fixed to a wooden board and hung up on the door of each home. It was part of the *baojia* registration for groups of five or ten households (and ten times ten households etc.). The form sheets were primarily meant for the registration of all the residents of the household, including family members and servants. However, these documents sometimes provided additional explanations or exhortations about what the dwellers were supposed or forbidden to do, such as in this specimen from the Tangxi

District in Zhejiang Province from the year 1874. It states

This door plate of the 36<sup>th</sup> group of ten households under the leader Cao Jingong 曹金恭, in the second row under the leader Cao Kaiyou 曹開有, enumerates all people [*min*], male, female, adults and children. Among these is the *min* [civilian, or ordinary subject] Cao Bangqi 曹邦起, 30 *sui* [years of age after conception], of this prefecture and this district. His family consists of two male adults and four male children, and three female adults.

The form sheet indicates the employees, their ages, and their number, as well as the amount of leased farmland, mountains and ponds and the sum of the rent payment. The latter is left blank. Furthermore, the document states:

It is forbidden (i) to form gangs, convene in communal [heterodox] worship, eat vegetarian meals together and arouse the crowds, (ii) to gamble, rob, engage in rape, and kidnap brides, (iii) to conceal weapons and hide bandits, (iv) to reclaim land for cultivation and refuse to pay agricultural tax in kind, and to lease land and refuse to pay the rent. // Newly added people (male, female): [not filled out] // Dismissed people (male, female): [not filled out] // Date 1874, 6<sup>th</sup> lunar month, issued to the *min* (regular citizen) [name left blank] to post up, sealed with the large vermilion seal of Tangxi district, registration number [left blank]. // This plate has been bestowed by the authorities and not the slightest part may be deleted.<sup>2</sup>

The usage of classification of the population in groups of five or ten houses for purposes of control is ages old. A reference to this can be found in the *Guanzi* (Master Guan), a compilation of texts written between the fifth and the third centuries BC.<sup>3</sup> Although the actual relevance of the text to the realities of the period is not quite clear, the basic idea occurs in several passages of the *Guanzi* and related texts. The *baojia* household registration and mutual responsibility system in its Late Imperial form was introduced in the Song dynasty around AD 1073. It had different functions in the Ming, where it served for self-defense and in the Qing, when it had the function of maintaining public order,

2 'Qingdai Tangxi menpai' 清代汤溪门牌 (Qing dynasty door plate of Tangxi district), website *Kongfu dang'an yanjiu zhongxin* 孔府档案研究中心 (Research Centre of Local Archives of the Kong Family Mansion), Qufu shifan daxue 曲阜师范大学 (Qufu Normal University), <http://kfda.qfnu.edu.cn/info/1135/2523.htm> (accessed November 13, 2019).

3 'Shi nong gong shang' 士農工商 ('On gentlemen, peasants, artisans, and merchants'), Chapter Shengma 乘馬 ('On military taxes'), in: *Guanzi. Political, economic, and philosophical essays from early China*, transl. by W. Allyn Rickett, I (Princeton 1985) 119-120.

and later was also used for taxation.<sup>4</sup> The point to make here is that *min* or *liangmin* ('people' or 'respectable citizens/subjects') were entitled to protection of their persons, their dependents, their belongings, and their status of ordinary (not debased or servile) persons. This is not expressly stated on the household registration sheet, but is made explicit in the legal code of the Qing dynasty. And it was well-known that there was possible recourse to litigation in the event of violation of this protection. This may be a far cry from active political participation, but the civilian status did imply certain rights also in China.

Maarten Prak stresses the difference in power structures of the Chinese towns and the imperial administration as compared to Europe. While European cities could enjoy a separate status that allowed for political and economic self-administration and military self-defense, Chinese cities remained formally a part of a hierarchical structure of public administration. Nevertheless, in practice, the official authorities in the Chinese cities depended on cooperation with the existing urban self-organized institutions. The most important of these were guilds and benevolent societies; their vital functions have been outlined in this book.<sup>5</sup> Self-defense on a local level seems to be a point of greater difference, and the reader gains the impression that in China there was hardly any counterpart to the European urban 'shooting guilds'. Nevertheless, militias existed also in the Ming and Qing empire. They gained more importance in certain periods, usually at the end of dynasties, when central power eroded.<sup>6</sup> Guilds did have their own self-defense corporations, and militia were organized both by officials and by local elites in the countryside.<sup>7</sup> One famous militia body near the city of Canton fought in the first Opium War (1838-1840).<sup>8</sup> The question of other

4 Wu Renshu 巫仁恕, 'Guan yu min zhi jian --- Qingdai de jiceng shehui yu guojia kongzhi' 官與民之間----清代的基層社會與國家控制 ('Between Officials and the People/Citizens --- The Grassroot Society in the Qing and the Control of the State'), in: Huang Kuanzhong 黃寬重 (ed.), *Zhongguoshi xinlun: Jiceng shehui fence* 中國史新論：基層社會分冊 (*A New History of China. Volume: The Grassroot Society*) (Xinbei City 2009) 432. According to this author, the systematic coverage of all provinces of China within the system can be dated to 1757.

5 The observation that Chinese guilds did not provide for an apprenticeship system is erroneous (258). A salient difference to European guilds is that, at least to my knowledge, the Chinese guild documentation does not contain references to a masterpiece to be completed at the end of the training period.

6 M. Szonyi, *The art of being governed. Everyday politics in Late Imperial China* (Oxford and Princeton 2017) 171, mentions a lineage which hired militia in order to get rid of overbearing (regular) colony soldiers.

7 See Philip Kuhn's discussion of nineteenth-century militia troops in his *Rebellion and its enemies in Late Imperial China. Militarization and social structure, 1796-1864* (Cambridge (MA) 1970) 64.

8 Kuhn, *Rebellion and its enemies*, 70.

recruiting and commanding groups than local officials leads to the issue of European command structures within the local defense systems as well: not only European citizens of equal rank, but also elites made provision for the supply of weapons and the command of soldiers for the defense of the cities. It is highly relevant that Prak remarks that depending on what is considered as the most salient features and parameters of comparison, the differences between Europe and China may seem to be more or less important. As for the 'public sphere', he reminds us that it was 'equally confined to a narrow group of persons in Europe' (256).

The conclusion to the chapter about Asia sums up the points of the greatest variations between European and Asian citizenship. They consist in the fact that Asian local government was part of a unitary national administrative structure, not separate and diverse as in Europe. In consequence, towns and cities in Asia had no representation in national institutions, such as the regional and national parliaments, for formal communication between governments and city or town representatives, as they existed in some (but not all) European countries. In a theoretical turn that resembles the approach of Kenneth Pomeranz, Prak tries to overcome Eurocentrism in that he not only asks the question why China did not develop the way Europe did, but also poses the reciprocal question why Europe did not end up the way China did in the nineteenth century.<sup>9</sup> This approach leads him to the conclusion that by the increase in state and national authority in some European countries after the French Revolution, these came to resemble China and the Ottoman Empire more than before.

In nineteenth-century China, guilds took over much of the urban administration as the state increasingly declined in power. Militia, especially merchant militia, were a common sight in the cities. In some cases, they were formed on the basis of clubs for physical exercise which had armed themselves, such as in Shanghai and Suzhou.<sup>10</sup> Some of the merchant militia actively participated in the overturn of the Qing monarchy in the years 1911 and 1912, as in Hankou<sup>11</sup> and Suzhou<sup>12</sup>, or

9 K. Pomeranz, *The Great Divergence. China, Europe and the making of the modern world economy* (Princeton 2000) 8, 13.

10 See Chen Zhongping, *Modern China's network revolution. Chambers of commerce and sociopolitical change in the early twentieth century* (Stanford 2011) 134 ff, for the Shanghai five clubs for physical exercise founded in 1904 and the Suzhou merchant physical exercise club of 1906.

11 M.-C. Bergère, 'The Chinese bourgeoisie 1911-1937', in: J.K. Fairbank (ed.), *The Cambridge history of China*, vol. 12, *Republican China 1912-1949* (Cambridge 1983) 732-733.

12 Chen Zhongping, *Modern China's network revolution*, 135.

*Illustration 2 Suzhou Merchant Corps, photograph in commemoration of its reorganization on 26 March 1922. (source: Website of the Suzhoushi difangzhi bianzuan weiyuanhui bangongshi Suzhou City Gazetteer Compilation Office), Foto Gallery, installed on 19 December 2008. <http://dfzb.suzhou.gov.cn/dfzb/mgq/200812/6e7ff1aa5d-de42f9bea0cf045f68616b.shtml> [Access 7 September 2020].*



they were established in the wake of the revolution, such as in Shanghai and Guangzhou (Canton).<sup>13</sup> With memberships in the thousands in the cities and in some cases subbranches in smaller towns, they constituted a force that urban administrations had to reckon with and often first tried to impede, then to co-opt. One spectacular case from the Warlord era is that of the Guangzhou (Canton) merchant militia that resisted the military government under Sun Yatsen in 1924 during the so-called Canton Merchant Corps Uprising.<sup>14</sup> The function of these voluntary corps was the protection of merchant property, but also the maintenance of public order in periods of declining capacities of the urban police forces. The organizations were often short-lived. The corps that lasted longest was the Suzhou Merchant Corps: from the foundation of the physical exercise club in 1906 until the dissolution in 1936 by order of the Nationalist government. These were the times when in Europe almost all countries formed nation states and had more or less centralized governments.

Since Maarten Prak stresses shooting guilds as an expression of urban autonomy (159 ff.), we have discussed the Chinese merchant corps for contrast. These organizations emerged at a point in Chinese history when the central governments were weak and in need of support for the more mundane tasks of local administration and peacekeeping. As soon as they gained greater assertive power, such as the Nationalist gov-

13 E.J.M. Rhoads, 'Merchant associations in Canton, 1890-1911', in: G.W. Skinner and M. Elvin (eds.), *The Chinese city between two worlds* (Stanford 1971) 97-116, 113.

14 Hu Qirui 胡其瑞, *Jindai Guangzhou shangren yu zhengzhi (1905-1926)* (近代廣州商人之與政治, The early modern merchants of Guangzhou and Politics, 1905-1926). MA Thesis, National Cheng-chi University, Taiwan (2003) 145 ff.; H. van de Ven, *War and nationalism in China, 1925-1945* (London 2003) 84-85.



ernment from 1927 onwards, they would put an end to the armament of the commercial associations and assert their power of violence.

To sum up, in this well-written book, Maarten Prak's reflections on citizenship in China offer many interesting and provocative comparative perspectives. Nevertheless, the comparison of China, the Ottoman Empire and South America is not commensurate with the parts on Europe. A consideration of China and the other non-European regions should add more detail and show changes over time. It would therefore be highly desirable if the author would co-author a book together with specialists for citizenship in other parts of the world.

## About the author

**Christine Moll-Murata** is chair professor at the Department for History of China, Ruhr University Bochum, Germany, and honorary fellow of the International Institute of Social History, Amsterdam. Her research focuses on labour history of China, Taiwan, and Japan, the history of crafts and guilds in China, perceptions of the future in East Asia since 1900 and the industrialization of Northeast Asia. Important publications include her monograph, *States and Crafts in the Qing Dynasty*, (Amsterdam 2018), and *Zukunft in Ostasien / Future in East Asia*, *Bochumer Jahrbuch zur Ostasienforschung / Bochum Yearbook of East Asian Studies* 41 (2018) (Thema issue 2018, edited with Rüdiger Breuer).

E-mail: [Christine.Moll-Murata@ruhr-uni-bochum.de](mailto:Christine.Moll-Murata@ruhr-uni-bochum.de)

