

Example or deterrent?

The role of the Netherlands in German post-war public debate

*'Man muß zwischen Deutschen und Niederländern ja immer so aufpassen.
Sie sind sich so ähnlich und doch so verschieden'*
– Richard von Weizsäcker

Abstract: How a writer describes a foreign state reveals less about the country or its people than about the author himself. The stereotypes used and the overall image that is painted shows how the other country is defined as different, thereby illuminating the conscious or unconscious self-image of the own nation. While the question of how Germany is perceived by its smaller neighbours has often been researched, the reverse is far less common. In the case of the Netherlands, the overwhelming majority of research has looked at the Dutch view of the Germans, with very little attention paid to the reverse. This thesis investigates the reporting by two German weekly newspapers, *Der Spiegel* and *Die Zeit*, by looking at three charged subjects that have caused much ink to be spilled in the decades after the Second World War: illegal drugs, abortion and euthanasia. By looking at how and when the Dutch situation was reported on with regard to these subjects, and at how it was placed in the German debate, an image of the view of these papers on the German situation is revealed. A further chapter takes a slightly broader view, looking at how the rise of anti-immigrant populism in the Netherlands changed the view of the stereotypical Dutch tolerance. Overall it shows that the Netherlands are used as an example for the German situation, for good or bad. And that, despite adjustments in the 21st century, the stereotype of the Dutch as a pragmatic, tolerant nation as opposed to the less pragmatic Germans remains.

1. Researching the image	4
The German (self-)image	4
The German 'Niederländebild'	6
Analyzing Newspapers	7
Research subjects	9
Methodology	10
2. Drugs policy.....	12
The history of governmental drugs policy	12
German Newspapers and drugs policy	13
Drugs policy overview	16
3. Abortion	18
The history of abortion in Germany and the Netherlands	18
German news media on abortion	19
Abortion overview	21
4. Euthanasia	23
Euthanasia in Germany and the Netherlands	23
German media and euthanasia	25
Euthanasia overview.....	28
5. Tolerance	30
The history of the image of Dutch tolerance.....	30
German media and Dutch tolerance	31
Tolerance overview.....	35
6. Discussion	37
Results from the studied events.....	37
Changes in the newspapers themselves.....	38
Future research	39
The image of the Netherlands in German media	39
Literature.....	41

1. Researching the image

What is Germany? For the last 150 years this question has occupied not just the Germans themselves, but their neighbours and other European powers as well. During this time the German self-image has undergone many changes and strong influences. From the transformation of a patchwork of small states into a major power, through the horrors of the early twentieth century, the divisions of the Cold War and finally a reunified state within a European community. Throughout these events and changes the study of both Germany's self-image and its image abroad has been a major preoccupation of scholars in and outside Germany. The result of these studies could fill small libraries, and includes a significant amount of research on how other nations view the German people and the various manifestations of the German nation state. How Germans view neighbouring nations, on the other hand, has received less attention outside of perennial example and enemy France. This is unfortunate since the answer to the question how Germans view other countries can tell us much about the German self-image. The Netherlands is both a country that has existed as a nation for enough time for there to be clear stereotypes and one that has a long standing relationship with Germany, both before the Second World War and after. Its (sometimes) image as a socially pioneering society makes it a logical subject when trying to find German responses to changing times.

The purpose of this study is to investigate how the Netherlands and its people are represented in Germany. Specifically how (West-)German newspapers in the post-war period reported on the Netherlands with regard to a handful of themes and events and what this can tell us about the self-image of (West-)Germany. The events chosen are for the most part ethically challenging matters which have been major social issues in western countries in the last forty years. Some of them have more loaded in the German discussion due to related atrocities during the Third Reich. We will try to find what, if anything, colours the reporting and whether the result of Dutch policies are taken into account. Are the Dutch experiences used as data or simply as an example while emphasis is placed on the German historical experience. Does the overall image of the Netherlands change over time or by subject? And what differences and similarities between the two countries are portrayed?

All this will have to be placed into the current academic debate about national image and newspaper analysis, while keeping in mind the question of the impact and distribution of these images among Germans, considering the specific segment the newspaper readers belong to, let alone the editorial staff itself. The value of the research, academically speaking is the almost complete lack of comparable research, at least with regard to the German image of the Netherlands as opposed to the reverse.

The German (self-)image

While every nation will argue about what it means to be a member of it and how this should or has changed, few people have argued as much and as long as the German-speaking people. A major reason for this is that Germany is, as Helmuth Plessner called¹ it, a 'late' nation state. While the Holy Roman Empire gave the German-speaking people and their multitude of states and territories enough unity to protect them until the end of the eighteenth century,² it became a unified state later than most. Of course for much of the existence of the Holy Roman Empire it was unified countries such as France and England that were the exception. A old Dutch dictionary even notes that the French and English usage of the word 'nation' for people belonging to a state, even if they do not speak the same language as rather peculiar.³ It was only during the nineteenth century, after the dissolution of the Holy

¹ Helmuth Plessner, *Die verspätete Nation* (Frankfurt am Main, 1982), originally written in 1935.

² Frederik Willem Boterman, *Moderne Geschiedenis van Duitsland: 1800-Heden* (Amsterdam, 2005), 27.

³ Eric J. Hobsbawm, *Nations and Nationalism since 1780: Programme, Myth, Reality* (Cambridge, 1990), 17.

Roman Empire, that the question of who 'the Germans' were and what unified them truly became important. By the middle of the century the development of a true German nation state seemed overdue, compared to other nations. When this unification finally arose in 1871 however, it didn't solve the question of what characterised the German nation. The attempt by the new country to prove its *raison d'être* by competing with the established empires was once of the causes of the First World War.⁴ While the defeat in that catastrophic war, and the creation of the Weimar Republic, did lead to large changes in society a significant part of the population held on to old identity.⁵ It wasn't until the aftermath of the Second World War that a significant change in the German self-image took place. As the division of the country into two ideologically opposed parts settled in and the horrors of the Third Reich were processed, views about the German identity and nationalism became more critical, even going so far as to be negative.⁶

Since reunification the role and image of Germany, both towards itself and by others has changed once again. While the self-image of West Germany was tempered by the process of dealing with the holocaust, and its relative power within Europe was balanced both by no longer having the largest population as well as the threat of the Soviet Union, the reunified Germany was far less influenced by these issues. It was once again the largest nation in Europe, barring a collapsed Russia, while a new generation was less directly influenced by the war years. All of which resulted in a slow change. As the self-image became stronger, it also became more uncertain. What was the role of Germany in the 21st century?

While the introspection of academics and other writers into the image of Germany didn't falter during this period, it has gained a renewed focus since the *Wende*. Not only on how, in this new chapter, Germany sees itself in regard to the past^{7,8}, but also what the new German identity is and how it is changing.⁹ Any research into this image will have to be placed in this discussion about the change in German identity and self image both in the later post-war years and since reunification.

As a result of the complex history the very name 'Germany' itself can be rather ambiguous. Partly because there has been no single political entity that went by this name for most of history and partly because the cultural and linguistic territory ascribed to 'the Germans' has been both disputed and undergone many changes throughout the centuries. When discussing more recent history the largest problem is the temporary division of what is now Germany into two separate nations for over forty years. It is therefore extra important to be clear about what territory is meant when talking about this period. For the purpose of this study, any mention of 'Germany' after 1949 (and before 1990) will refer to the *Federal Republic of Germany* (FRG), more commonly called West Germany, unless stated otherwise.

Evaluating the self-image of a nation is always difficult and sometimes, as a general statement of the entire population, close to impossible. Still, several options exist to investigate what it is and how it changes over time. One way is to use surveys, which will at least show a broad sentiment within a larger group. However, in evaluating historical views, such sources tend to be rare and difficult to compare. Another way is to look at the representation of or discussion on the typical or ideal citizen in literature, press or other text. A downside of both these approaches is that the source is based on a conscious representation of what is ultimately a self-image. A more subtle way of researching national self-image is to look at how people in a nation represent other nations. Since the definition of

⁴ Boterman, *Moderne Geschiedenis van Duitsland*, 163.

⁵ Wolfgang Schivelbusch, *Die Kultur der Niederlage: der amerikanische Süden 1865, Frankreich 1871, Deutschland 1918* (Frankfurt am Main, 2007), 245.

⁶ Hobsbawm, *Nations and Nationalism since 1780*, 189.

⁷ Jens Schneider, *Deutsch sein: das Eigene, das Fremde und die Vergangenheit im Selbstbild des vereinten Deutschland* (Frankfurt am Main, 2001).

⁸ Katharina Grabbe, *Deutschland - Image und Imaginäres: Zur Dynamik der nationalen Identifizierung nach 1990* (Berlin, 2013).

⁹ Wolfgang Bergem, *Identitätsformationen in Deutschland* (Wiesbaden, 2005).

a group always includes separating it from 'the other', the way other nations are described can give an illuminating look into how they think about themselves, without the subject necessarily being aware of what they are doing. The image of other countries tends to be based in certain, sometimes conflicting, stereotypes and clichés. This image can vary according to time, medium and author, complicating the creation of generalised theories or descriptions, though often certain core concepts can have a very long shelf life. One Dutch description of German in the 17th century as their being warlike and fond of alcohol matches that of the Roman writer Tacitus almost word for word.¹⁰

Despite the limitations research into image has, a field of comparative imagology arose out of literature studies before becoming an interdisciplinary subject in the 1980s.¹¹ Instead of just focusing on the representation of nations in fiction, it has added other texts, sociological backgrounds and techniques to its repertoire. Key to studies in this field is less a generalized theory or overall representation of image than identifying how the image is constructed: which elements are repeated either as a positive example or a negative warning? In short: what is the discourse on a certain nation? Using these techniques as a starting point to research the German description of a well known, but still foreign nation makes it possible to gain insight into the German self-image.

The German 'Niederländebild'

The Netherlands have, for the Germans, always been a country that is both different and familiar. While the idea that it was 'really' part of the larger German nation remained active in some quarters for a long time,¹² the Dutch were also increasingly an 'other', whose particularities contrasted and illustrated the German ones. Sometimes the difference would be emphasised as a negative one, such as describing the Dutch as a nation 'marked by greed, usury spirit, selfishness, suspicion and resentment.'¹³ At other times, or by other authors, the Netherlands was seen as 'free, prosperous and educated'¹⁴ (during its golden age in the seventeenth century) or modern, progressive and experimental (from the late 1960s)¹⁵. While descriptions of the Dutch exist in older German literature, travel diaries and historical works¹⁶ and there has been a fair amount of research on the way Germany and its people are portrayed in Dutch literature, media and other text, the reverse is far less common in recent times. The German 'Niederländebild' has only really been explored by way of its representation in literature, and even then mostly in the works of the nineteenth century, when concerns about nation and nationality were at a high point.

Some of this is understandable, since Germany, particularly after 1871, was by far the larger and more important nation. The new empire dwarfed the Netherlands by any measure, be it population, land area, economic power, military might or cultural influence. Even in the post-war situation, with the new FRG a greatly reduced figure as compared to the pre-war empire or even the Weimar Republic, a large difference between the two countries remained. While

¹⁰ André Beening, 'Problemen bij beeldvormingsonderzoek', in *Nederland en Duitsland in het interbellum: wisselwerking en contacten: van politiek tot literatuur*, ed. Frits Boterman and Maria Vogel (Hilversum, 2003), 89.

¹¹ Hugo Dyserinck, 'Komparatistische Imagologie jenseits von ‚Werkimmanenz‘ und ‚Werktranszendenz‘', in *Synthesis XI* (Bucarest, 1982).

¹² Julius Langbehn, *Rembrandt als Erzieher* (Leipzig, 1890), 23.

¹³ '[Ein volk] geprägt von Geldsucht, Wuchergeist, Egoismus, Argwohn und Missgunst'

Horst Lademacher, 'Deutschland und die Niederlande. Über Aussenpolitik und Fremdbilder im wandel einer beziehung von 1648-1939', in *Die Niederlande und Deutschland: Nachbarn in Europa*, ed. Dietmar Storch and Joachim Friedrich Erwin Bläsing (Hannover, 1992), 47.

¹⁴ Rob van Ginkel, *Notities over Nederlanders: Antropologische Reflecties* (Amsterdam: Boom, 1997), 19.

¹⁵ Claus Victor Bock, *Deutsche erfahren Holland, 1725-1925: eine Sammlung von hundert Berichten*, Castrum Peregrini 27-28 (Den Haag, 1956), 23.

¹⁶ Friedrich von Schiller, *Geschichte Des Abfalls Der Vereinigten Niederlande von Der Spanischen Regierung* (Leipzig, 1870) originally written in 1788; J. S. Bartstra, 'Onze voorouders door vreemden beoordeeld', *Onze eeuw* 12, no. 2 (1912): 58-89; Albrecht von Haller, *Albrecht Hallers Tagebücher Seiner Reisen Nach Deutschland, Holland Und England, 1723-1727*, ed. Erich Hintzsche (Bern, 1971).

the Netherlands were strongly dependent on German economic performance, this was far less the case for the export colossus to the east. Similarly, while the Dutch have a land border with only two neighbouring countries it is understandable that much of their international focus is on Germany. The Germans on the other hand not only have nine direct neighbours but on top of that a long list of nations it has been in armed conflict with during either the First or Second World War, not to mention the more important role Germany plays in international diplomacy. All of which creates a much larger group of nations that are at least of some importance to Germany and that may contribute to the German self-image. Still, it is remarkable that the question of how the Dutch are represented in is almost completely uncharted territory. Not only since, even taken the disparate importance into account the Netherlands are a significant ally and an important economic partner, but also due to the timing of cultural change in both countries. The Netherlands have often gone through cultural flash points shortly before or at the same time as (West-)Germany. While in some ways Dutch civil society didn't undergo much fundamental change until the 1960s, German society after the war even became somewhat more conservative. Despite or even because of the massive upheaval of the decades before the call was 'no experiments!' in areas such as female emancipation.¹⁷ Combined with the world wide changes in society during the 1960s this led to many a change coinciding between the two countries. The result of this has been that the Dutch were often a logical example in the German debate, either as a road to follow or as a deterrent. The way in which such comparable events or discussion in the Netherlands are reported shows not only what image of the Netherlands was presented, but by contrast the self that is being projected by its authors. In other words, by looking at how the Dutch example is used in the German discussion we can further our understanding of the German self-image.

Analyzing Newspapers

A good place to follow such discussions are newspapers, who by their very reporting show what subject is considered important in a society at a specific time, since they have short turnaround times and limited print space. Still, while newspapers are an excellent source of historical information, they also pose significant interpretation problems. They are part of a discourse, focusing on events that are considered 'normal', while excluding news and discussions that are not part of the mainstream. Their reports are neither pure fact nor solely the opinion of either the author, the editorial board or a possible owner. Any analysis can therefore only be on the discourse of the paper itself. Any strong subjective image found does not show what Germans in general or even the audience of a specific newspaper think, but only what kind of image is created by the newspaper and possibly how this changes over time. This may say something about how this image influences its readership, but such conjecture is difficult to prove.

Therefore the qualitative goal of such research is enhanced by reports that focus less on what is considered to be the objective version of general events and more on articles that are clearly meant to be subjective. This is most obvious in opinion pieces and letters to the editor, but can also be found in long-form articles that dive deeper into a subject. Of course any article may be quite obviously biased, though this can be harder to show in papers that attempt or claim to report the news objectively. This means it is possible to see somewhat of a dichotomy between clearly subjective papers that tend to have shorter articles and less attention for other countries (often but not always so-called tabloids) and sources that potentially have a richer corpus with more depth, but will have opinion an opinion that is less clearly subjective (the so-called broadsheets). Awareness of this dichotomy is important in selecting and analysing a newspaper source.

It is inherent to all news reporting that it must be quite limited in depth and reach. Due to scarce resources and limited space any report is the result of a stark choice between dozens of subjects. This limitation is even stronger for international news, which is often of not as

¹⁷ Robert G. Moeller, *Protecting Motherhood: Women and the Family in the Politics of Postwar West Germany* (Berkeley, 1993), 212.

much of interest to the consumer and therefore more limited in commercial value leading to even less space. While this last consideration could limit the possible research, in the sense that there may be very few or even no reports available on a certain event, even the absence of reporting demonstrates a conscious choice. When looking at key events in the Netherlands, the negative space of no report in German newspapers can be telling, though it would be necessary to show how significant such an absence is. That is whether or not you would expect a certain publication to report on that kind of story, based on history. Similarly, the moment a paper first reports a story which originally was ignored, reports again after a significant amount of time, or stops reporting on a previous one, shows a change in conceived importance which can be quite telling as well. So while many news stories are seemingly only factual, the change in their frequency alone can show a shift in interest and should therefore be taken in account when doing research.

A further difference between normal newspaper analysis and the analysis of foreign reporting is the slightly different way the standard encoding/decoding loop¹⁸ works. In the standard situation the paper influences the reader and the reader, in consequence, influences the paper. The situation with reports on foreign matters and events is slightly different. While the cycle is still in place, the externality of the situation means that while the image of the foreign nation in the mind of the *readers* is influenced and this consequently shapes further reports, there is far less influence on the events themselves. That is, while in our example the German reader will form an image of the Netherlands based on the reporting he or she reads, the Dutch themselves are far less influenced by how they are reported on in foreign newspapers. Their principle reaction will be from and to Dutch sources.

Ultimately any analysis of newspapers is both highly dependent on the choice of the publication as well as a very critical reading while remaining vigilant for the many subjective parts that are part of making any conclusion.

Selecting the sources is a matter of both focusing the research on the most useful publications as well as finding usable sources. With regard to the latter there are two ways newspaper sources can be studied. Traditionally the only option was to look at hard copies from an archive. In general very few German newspapers are archived in the Netherlands. Only the *Frankfurter Allgemeine Zeitung* (FAZ) is almost completely available in hard copy. Luckily, with the advance of technology, more and more newspaper sources are now digitally available, though this is very much an ongoing process, which is still far from complete. The Dutch *Delpher* project now encompasses around 10% of all Dutch newspapers ever printed¹⁹ which, while impressive, still leaves huge gaps. Since even Dutch papers are far from completely converted it is understandable that German newspapers are not part of this digitisation project at all. At the same time German digitisation projects are mostly focused on pre-war and older newspapers, limiting the possibilities of internet research.²⁰ The exceptions to this are two German weekly newspapers: *Der Spiegel* and *Die Zeit*, both of which have their entire publication history freely available on their websites.

The two periodicals are also quite useful for media research in the post-war period: both were started shortly after the Second World War and are nationally read: circulation of *Die Zeit* is above half a million, while *Der Spiegel* publishes more than a million copies each week, with both having still larger circulation in pre-internet times. Even taking into account the warnings of the previous section, it should be noted that German newspapers hold an above average significance compared to some other western nations, due to a significantly slower decline in readership. Where the average daily reach of all newspapers declined from

¹⁸ Stuart Hall, 'Encoding/Decoding', in *Media Studies: A Reader*, ed. Paul Marris and Sue Thornham (Edinburgh, 1996).

¹⁹ <http://www.delpher.nl/nl/platform/pages/?title=collecties>, last visited 05-05-2016.

²⁰ <http://zefys.staatsbibliothek-berlin.de>, last visited 05-05-2016.

72 to 58 percent in the US during the period 1975-1997, the German figures are 85 to 80 percent.²¹

The advantage of online availability is that this makes it possible to search through the entire publishing history for any article on the Netherlands. By combining the newspaper sites with the abilities of search engines such as Google, results can even be relatively easily limited to articles that mention both the Netherlands and certain keywords, or that were written during a specific period. This gives us access not only to the articles we want to investigate, but also to quantitative results in the form of the number of articles written in a time period or on a certain subject. Although one can argue that the usefulness of these numbers is limited, it can give us hints into when changes took place.

Both newspapers mentioned are aimed at a middle class readership, with higher education levels, and not the broadest possible readership. While a comparison with a tabloid paper such as *Bild* (circulation over two million) could be quite illuminating, the lack of archives, both hard copy or digital, makes such a comparison impossible. Though this is unfortunate, since tabloids tend to have a more explicit sentiment in their reporting, it also eases the scope of the research. Another matter of distinction is the political leaning of newspapers (and with that a large part of their readership). Ideally we would look at both a more conservative paper as well as a left-wing one. While the *Frankfurter Allgemeine Zeitung* is the standard bearer for centre right conservative reporting and would be an excellent candidate, the lack of digitalisation, and limited hard copy access ensures that it cannot easily be searched for articles specifically on the Netherlands, which makes any direct comparison with the other two newspapers difficult. The other two papers do have a slight political difference. *Die Zeit* is generally associated more with the liberal part of the German political spectrum, while *Der Spiegel* used to be viewed as quite left leaning, though this has lessened in recent years. Both are also seen as quite independent, with the *Spiegel* as perhaps the strongest investigative newspaper of Germany, uncovering many political and other scandals in its almost seventy year history. Overall, looking at these two papers should give us an insight in how a specific segment of the press reports.

Research subjects

In the seventy years since the end of the Second World War an enormous amount of ink has been spilled on a multitude of subjects. Even restricting the research to articles that mention the Netherlands and that were published in *Die Zeit* or *Der Spiegel* still leaves us with several thousand articles per newspaper. To limit the amount of source material we must focus on specific events or (short) time periods in which a subject relating to the Netherlands became a subject of discussion in Germany. To this end this study will concentrate on a limited number of areas and time periods that are likely to provoke discussion and/or the drawing of subjective images:

Abortion. Abortion has been a hot topic in most western nations since at least the nineteenth century and continues to be to this day. For Germany the subject is even more difficult due to heightened sensitivity with regards to anything relating to the etches surrounding human life, as a result of the experiences during the Third Reich. The opening of the first abortion clinics in England in the late 1960s and the Netherlands in 1971²² was a turning point for the discussion of the subject in many countries. From all over Europe, and especially Germany, women came to the place closest by where it was relatively easy and safe to acquire an abortion. Shortly thereafter, in 1974, the German government passed a law liberalizing abortion in West Germany which was quickly struck down after a law suit by conservative

²¹ Klaus Schoenbach et al., 'Research Note: Distinction and Integration Sociodemographic Determinants of Newspaper Reading in the USA and Germany, 1974-96', *European Journal of Communication* 14, no. 2 (1 June 1999): 229.

²² Joyce Outshoorn, *De politieke strijd rondom de abortuswetgeving in Nederland 1964-1984* ('s-Gravenhage, 1986), 23.

politicians.²³ This led to abortion law remaining far more restrictive in West-Germany until years after reunification. At the same time the Dutch situation evolved further, resulting in a more liberal law in 1984. The general newsworthiness of the Dutch clinics and the discussion in Germany in the years thereafter should lead to enough material in which the Dutch situation is compared to the German one.

Illegal drugs policy. In the late 1960s, a wave of heroin trading and use swept the countries of Western Europe. In the Netherlands police and politics made the decision to not go after users of cannabis and focus on the heroin dealers and smugglers instead. In 1976 the country changed to law to officially separate drugs into 'hard' and 'soft' categories, and to differentiate between drug users and distributors.²⁴ Meanwhile in Germany the government had updated its own, similarly old, drug laws shortly before, but chose to focus on tough sentencing, including for 'soft' drugs. When in the early 1980s both countries saw a continued increase in heroin addicts and related crime, and a significant movement of German addicts to the 'more permissive' Netherlands, experts and politicians in both countries complained about the others policy.²⁵ Both the 'heroine epidemic' and the difference between the countries received much attention in both countries.

Euthanasia. Unlike abortion, euthanasia has gained a completely negative connotation in Germany due to national socialist excesses. So much so indeed that the term itself is tainted and German discussion almost always use the term *Sterbehilfe*, which has less of a bad association. The discussion in Germany therefore is significantly more cautious about this subject than in regard to similar topics, even in the post-reunification area when German society started releasing some of the tensions from the Second World War period. When legal euthanasia in the Netherlands was introduced in 2002,²⁶ it led to strong reactions in Germany and an enduring discussion that is still ongoing.²⁷

Tolerance. Each of the first three subjects both evoke strong opinions and have a history in which the discussion either occurred simultaneously in both countries or saw the Netherlands change their policy or approach first. Therefore there are likely to be reports that comment on the similarities and differences between the countries. The final subject of research is one which casts the net slightly wider. One of the key values attributed to Dutch society by German commentators (as well as those from other countries), is tolerance. In discussions of many subjects, including the three other research focus points, the supposed Dutch tendency towards tolerance of other people and ideas is given as one and often the most important reason for divergent choices made in the Netherlands. With the rise of Dutch anti-immigrant populism in the early part of the 21st century, this idea was confronted with a problem: how could the popularity of anti-immigrant parties and politicians be reconciled with the image of a people who were open to everything? This led to many articles explicitly re-evaluating the image of the Netherlands that existed in Germany, creating an opportunity for open discussion of what this image was. This part will look at how the concept has been reported on in the German press, and how, if at all, this changed with the rise of rightwing leaders.

Methodology

Research of the German newspapers was done at three levels. At first a basic assessment was made: how often were articles written about the Netherlands, does this frequency change over time, and if so how? Also a rough approximation was made of the different

²³ Karl Heinz Gössel, 'Federal Republic of Germany', in *Abortion and Protection of the Human Fetus: Legal Problems in a Cross-Cultural Perspective*, ed. Stanisław J. Frankowski and George F. Cole (Dordrecht, 1987), 130.

²⁴ Sebastian Scheerer, *Die Genese der Betäubungsmittelgesetze in der Bundesrepublik Deutschland und in den Niederlanden* (Göttingen, 1982), 165–66.

²⁵ Tim Boekhout van Solinge, *Dealing with Drugs in Europe: An Investigation of European Drug Control Experiences: France, the Netherlands and Sweden* (The Hague, 2004), 11.

²⁶ P. J. Lieveverse, ed., *Dood gewoon?: perspectieven op 35 jaar euthanasie in Nederland* (Amsterdam, 2005).

²⁷ Dick Meerman, 'Angst voor euthanasie. Nederlandse wet in Duitsland', *De Bazuin* 84, no. 13 (2001): 10–12.

types of articles. Some only mention the Netherlands once in a story about a different subject or in a summation of similar countries. Others may only be a brief completely factual report of an event in the Dutch nation or may only mention it in an aside. Finally the most useful articles for our purpose are the ones that either compare and contrast the Dutch and German situation, or longer investigative articles on the Dutch situation. The results of this estimate gave a first idea of how realistic the research goals were and on where to focus.

At the second level the focus was on general content. Were there enough articles on the chosen subjects? How often were they reported on and when did this start? The subjects were chosen with the expectation that at least some articles would compare the Dutch situation with the German one or show some more subjective opinion on the Netherlands. Choosing which might fulfil this criterion was therefore important to reduce their number of articles that had to be further analysed.

This happened on the final level. The chosen articles were read and analyzed for how they portrayed the Netherlands or compared them to Germany. For this step it was also important to look not only at the reporting itself but also at the economic, political and cultural situation in Germany at the time, since this is important background information for why they Dutch might be portrayed the way they were, of why they were reported on at all. Therefore some additional articles which concerned the issue, but not the Netherlands were added as well.

Conversely a handful of articles that concerned themselves directly with the Dutch image were also analyzed. Partly these fall under the header of 'tolerance'. At certain points articles have been published by *Der Spiegel* and *Die Zeit* which deal directly with 'what has changed' in the Netherlands, or that contrast the Dutch situation explicitly with the German one. Some fell within the area of the chosen subjects, such as articles directly comparing Dutch and German drug or euthanasia policy. In other cases they concerned themselves with a different subject, but were too useful a source to be excluded.

In the next sections we will look at each of the four subjects: abortion, drug policy, euthanasia and the idea of Dutch tolerance. Each section will explain the background of the subject in the two countries before showing how the two newspapers reported on them, keeping in mind that the most important part is how the Netherlands are represented and finally a brief overview. The final section will discuss what can be learned from the results: how the Netherlands are portrayed in the German media, what this can tell us about the image projected of Germany itself and how this fits into the general framework of German identity and the changes it is going through.

2. Drugs policy

The history of governmental drugs policy

One area where Dutch policy has differed significantly from the German one is the handling of illegal drugs. For most of the 1980s and 90s, and partially continuing to this day, the Dutch approach has been strongly criticised both by German and other European politicians.²⁸ During the same period some organisations working with addicts and other people in Germany commented favourably on the Dutch system. And as the policy bore somewhat positive fruits there have been steps made to copy parts of the policy in Germany, though criticism has certainly not gone away. All of which makes drugs policy a potentially fruitful subject in a search for articles that show the image of the Netherlands in the German press.

The history of substances that chemically influence people has often been one of governments trying to suppress them. Even coffee and tobacco were seen as dangerous when they were new and rather exotic products. In 17th century Russia, for example, the punishment for repeated abuse of tobacco was cutting open the nose of the user.²⁹ For these by now mostly considered harmless substances legal prohibition ended fairly soon, as usage both expanded and became part of the normal social interaction.³⁰ The usage of other mind-altering substances was sometimes frowned upon, but little systematic action was taken in most territories, especially since it was sold by states in their colonies and China. The first steps towards a general international outlawing of 'natural substances' came in 1912 when an international treaty regulating opium and several other substances was signed in the Hague after a long campaign by the United States.³¹

In Germany the treaty was only ratified and turned in to law after the creation of the Weimar republic.³² In the decades thereafter this 'opium law' was expanded with several new substances and slightly strengthened, but mostly remained as it was. During the national socialist regime, the propaganda was focused on portraying other countries, such as France, as the ones suffering from a drug problem. After the war, the largest group of addicts were war-wounded who had become addicted to their painkillers. This relatively sympathetic group and the focus on the rebuilding effort meant few attempts were made to alter the law.³³

This changed in the late 1960s when drug usage rose rapidly. According to one member of parliament, criminal drug use had increased by more than 278% over four years. Proclaimed 'a wave of drugs' by politicians and civil servants, this increase led to a major change in the law in 1971. The stated aim of the change was to avert major risk to both individuals and families, and ultimately 'to prevent danger to the functioning of society'.³⁴ It increased the maximum prison term to three years and allowed more differentiation in sentencing. It allowed judges to waive prosecution when it concerned small amounts, since it was felt that experimenters ('Probierer') should be spared. On the other hand, for serious offences up to ten years could be given. The greatly increased punishments were defended by argument that low punishments would act as an incentive ('Sogwirkung').³⁵ In both 1981 and 1992 the law was updated to increase punishments and update the list of illegal substances.³⁶

²⁸ Egbert Tellegen, *Het utopisme van de drugsbestrijding* (Amsterdam, 2008), 185.

²⁹ Scheerer, *Die Genese der Betäubungsmittelgesetze*, 1.

³⁰ *Ibid.*, 79.

³¹ Tellegen, *Het utopisme van de drugsbestrijding*, 159.

³² Scheerer, *Die Genese der Betäubungsmittelgesetze*, 62.

³³ *Ibid.*, 67.

³⁴ *Ibid.*, 82.

³⁵ *Ibid.*, 84.

³⁶ Chrystina Kunze, *Grundlagen der deutschen Drogenpolitik* (Halle-Wittenberg, 2004), 4.

In the Netherlands, the early trajectory of legislation was similar. After being the only country to ratify the 1912 treaty before the First World War, the Netherlands nevertheless kept a rather laissez faire attitude towards recreational drug usage. Partly this was due to it being seen as a niche problem. In the early 20th century the most reported drugs use in the Netherlands was the use of opium in the Chinese community and police reports on the cocaine use by seamen.³⁷ Over the next few decades, however, the drug laws were slowly tightened. By the early 1960s, when the use of illegal drugs in the Netherlands rose significantly, the first reaction of the authorities was one of repression. However, since the main rise at that time was in young people experimenting with cannabis, the reaction came more out of moral disapproval than due to acute problems. As such, when the problem persisted, other solutions were also investigated by forming study and advisory groups that looked at the entire field of problems and solutions. As one historian remarked: these working groups were established in an era and in a society where drugs use had come to the public consciousness against a backdrop of a relatively mild dispute of lifestyle and value system, and not against a background of criminality, pathology, and deeply rooted social conflict.³⁸ This meant that by the late 1960s, when the Netherlands also experienced an increase in crime due to heroin trade and usage, authorities were more focused on health and less on criminal prosecution than in Germany.³⁹ The result was not only a softer, less prosecuting approach to actual users, as opposed to drug dealers, but also a significant number of treatment options.

By 1976, the already existing separation between hard and soft drugs was codified into law, keeping the former illegal but assuring that possession of less than 30 grams would not lead to prosecution, while punishment for trade in the latter was raised from four to twelve years of jail. This led to the creation of the coffee shop system, sale points for cannabis meant to keep the sale of other drugs separate.⁴⁰ This approach, and the distribution of heroin and its surrogate drug methadone, became a point of conflict between the governments of the Netherlands and Germany. In the 21st century, the increase in the strictness of Dutch laws, and the positive results of the policy in the form of lower number of drug users and drug related death led to a relaxation of this tension.

German Newspapers and drugs policy

After not having written about any kind of drugs for two years, 1969 sees a string of articles in *Der Spiegel* on the rising drug problem in Germany⁴¹ and other countries.⁴² The Netherlands, however, were not mentioned in relation to drug use until a short 1971 article about a Dutch language student selling cannabis seedlings. The article remarked that it isn't illegal to have them. Only growing them to full plants which can be harvested for drugs can be prosecuted,⁴³ a first example of the difference between the two countries.

In 1975, another article declared Amsterdam the new 'European centre of the drug trade', after crackdowns in Marseille had moved the trade. The fact that Dutch law differentiated between hard and soft drugs is mentioned, which was supposed to be one of the reasons Chinese gangs had picked Amsterdam for their business.⁴⁴

³⁷ Boekhout van Solinge, *Dealing with Drugs in Europe*, 116.

³⁸ Ed Leuw, 'Initial Construction and Development of the Official Dutch Drug Policy', in *Between Prohibition and Legalization. The Dutch Experiment in Drug Policy*, ed. Ed Leuw and I. H. Marshall (New York, 1994), 27.

³⁹ Boekhout van Solinge, *Dealing with Drugs in Europe*, 108.

⁴⁰ *Ibid.*, 106.

⁴¹ 'Drogen in Schultaschen', *Der Spiegel*, 30 June 1969, 48; 'Gesellschaft / Rauschgift: Fleisch der Götter', *Der Spiegel*, 8 September 1969, 185; 'Gesellschaft / Haschisch: Tibet ist überall', *Der Spiegel*, 10 November 1969, 76; 'Schüler - Rauschgift: Haschu waschu', *Der Spiegel*, 30 June 1969, 46.

⁴² 'Dänemark / Rauschgift: Ware im Buddha', *Der Spiegel*, 28 April 1969, 144; 'Rauschgift / USA: Drang zum Pot', *Der Spiegel*, 27 October 1969, 144; 'England / Marihuana: Besser als trinken', *Der Spiegel*, 1 September 1969, 124.

⁴³ 'Gesellschaft: Hasch-Pflanzen', *Der Spiegel*, 7 June 1971, 114.

⁴⁴ 'Holland: Graue Würste', *Der Spiegel*, 27 January 1975, 81-84.

The conflict in the approaches of the two countries was first reported on in 1976, when a Dutch citizen was arrested and jailed in Germany for selling hash in the Netherlands. In an longer report, the *Spiegel* explained the distinction made in the Netherlands between hard and soft drugs, after the German prosecutor is quoted saying the harder sentencing in the case was the result of the increased heroin smuggling to Germany. He explained that the arrest fitted in the fight against heroin since cannabis was a gateway drug to heroin. The writer of the article corrected this by stating that this is a view 'scientists haven't agreed with for quite some time' and ended with the statement that 'this hard course of action is almost impossible to reconcile with the Dutch practice'.⁴⁵ In the next year, as the German drug problem continued to increase, *Der Spiegel* covered the rise of the heroin epidemic extensively, and pointed towards Amsterdam as the 'centre point' of the west-European trade.⁴⁶

In a 1982 article, the difference between the two countries came to a head, when the city of Enschede, close to the German border, decided to allow the sale of small amounts of hash to teenagers. As the report lamented: 'The liberal cousins of the Germans once again ruined it with their neighbours.' The article explained once again the goal of both avoiding the gateway effect as well as undermining the drug dealers.⁴⁷ Here we see for the first time a critique on the German policy or at least the way the situation is dealt with, albeit somewhat surreptitiously. A 1984 article reporting on the possible legalisation (or de-criminalisation) of heroin in Amsterdam meticulously laid out the advantages of the policy, but also showed how much the loosened soft drug rules have acted as a draw for criminals and junkies for whom Amsterdam had become a promised land of drugs.⁴⁸ The Dutch approach was clearly still viewed as causing as many problems as it solved.

This changed in 1990, when the paper proclaimed that after ten years of taking insults, the Dutch drug policy could finally show success by leading to a reduction in crime and addiction. It mentioned that though the next step of full legalisation could not be taken by one country in isolation, the Dutch would also not give up on what they had already achieved by themselves. One Dutch drug policy coordinator explained: 'Our drug policy fits with our culture, should be give it up, we give up our identity.'⁴⁹

By 1995, the *Spiegel* proclaimed that a change in the German drugs policy had occurred: the rigid fight against addiction had been lost, leading government, police and justice to reduce the intensity of the fight and had experts calling for experiments like in the Netherlands, Switzerland or Liverpool (where addicts were first supplied with heroin by the authorities).⁵⁰

While the calls from some foreign government for the Dutch to change their ways continued, the *Spiegel* seemed mostly amused by them. After the French president Chirac called the Netherlands a 'narcostate', and closed the border to Belgium arguing that the Dutch policy is was the cause for a rise in addicts in France, the paper took great delight in reporting on the results. The Belgian minister of the interior, frustrated by the border closings, tested the alertness of the French border police incognito and found them playing cards. The paper reported: 'A lot of noise, but nothing behind it.'⁵¹

In 1996, when the international pressure continued to rise, the Dutch government decided to make a gesture by lowering the maximum amount of marihuana that people could carry legally from 30 to 5 grams. The *Spiegel* article covering this reported on how the Dutch system of preferring solution to fight seemed to work, but also gives as an 'undeniable result'

⁴⁵ 'Mit holländischer Praxis ist dieser scharfe Kurs freilich kaum auf eine gemeinsame Linie zu bringen'

'Rauschgift: Ausfuhr per Ameise', *Der Spiegel*, 5 July 1976, 61–65.

⁴⁶ 'Heroin-Welle: „Mord auf Raten“', *Der Spiegel*, 30 May 1977, 184.

⁴⁷ 'Die liberalen Vettern der Deutschen standen wieder einmal im nachbarschaftlichen Fettnapf.'

'Niederlande: Fünf Gramm Haschisch', *Der Spiegel*, 25 October 1982, 161–64.

⁴⁸ '„Ganz weg sein - das ist am leckersten“', *Der Spiegel*, 20 February 1984, 142–55.

⁴⁹ 'Unsere Drogenpolitik paßt zu unserer Kultur. Geben wir sie auf, geben wir unsere Identität auf.' Mareike Spiess-Hohnholz, '„Nüchtern und pragmatisch“', *Der Spiegel*, 3 December 1990, 202–14.

⁵⁰ '„Alles, was knallt“', *Der Spiegel*, 6 February 1995, 40.

⁵¹ 'Europa: Drogenstaat am Pranger', *Der Spiegel*, 8 April 1996, 136.

that the Netherlands were the easiest and cheapest place to buy hard drugs. However the newspaper seemed rather amused by the policies. As it wrote in a combination of amusement and amazement about a group of pro-cannabis supporters who sat down in the spectator gallery of the parliament during the debate and all proceeded to light up a joint: 'No one stepped in. A decent smoke surely won't be denied in the future - not even in Parliament.'⁵²

Early in the post-war period, *Die Zeit*, following their slightly more staid image, seemed rather condescending about the first signs of an increase in drug usage. In an early 1956 report on a group of young addicts who travelled by bus and had left a string of thefts and frauds to finance their addiction in their wake, the paper attributed their fall to the demands of modern living, which leads to 'health being in less demand than extra wages, overtime payments or more profit', and is very much portrayed as a foolish result of the same.⁵³

In some ways the publication history of the *Zeit* in the next two decades on drugs was quite similar to that of the *Spiegel*. During the late 1960s the newspaper also published several slightly alarmed articles that looked at the rise of new and old drugs, especially in the USA.⁵⁴ By 1974 it declared that Amsterdam was 'no longer a paradise' for drug users.⁵⁵

By the time the extent of victims of the heroin wave became clear, the *Zeit* was more explicitly critical of the German response, as the sub header of one 1982 article showed: 'How the hash-experiment in the Dutch city of Enschede was destroyed'. The report explained how a Dutch municipality allowed an authorised dealer to sell drugs in a youth centre, which worked to separate the soft drug use from hard drug selling dealers. This program was destroyed by the enormous attention of the German media and politicians, leading to a return of the earlier unsafe practices. Nominally the article took no position, though cause and effect reporting makes it clear on which side the author stood.⁵⁶

Even clearer is the position taken in another article from the same year, which looked at the plight of German addicts in Amsterdam. A German organisation, founded in imperial times, worked with Dutch authorities to help long-term addicts stranded in the Netherlands. The article wrote that many of them did not come, as German politicians claimed, because drugs were easily available there, but because they had so much trouble surviving in Germany. It took the German government and experts to task for not saying out loud what many will admit in private: that the separation, as in the Netherlands, of hard and soft drugs works better than the harsh prosecution.

The lack of interest in other possibilities is illustrated by a quote from the man who runs the organisation. He stated that in the more than five years he had been working there, not a single expert from the German government or politician who was responsible for drug laws had visited the organisation that was responsible for by far the largest group of German addicts abroad. While the Dutch response was mostly praised, one disadvantage is mentioned: that the Dutch gave little to the organisation, but even there this was turned around: it was given as a logical response to the dearth of funding from the German authorities. As the manager was quoted: 'If the German authorities have no interest in this work, then why should [the Dutch]?'⁵⁷

⁵² 'Niemand schritt ein. Ein Pfeifchen in Ehren wird sicherlich auch in Zukunft keiner verwehren - nicht mal im Parlament.'

'Niederlande: Preiswert und lecker', *Der Spiegel*, 25 March 1996, 151–52.

⁵³ g. e., 'Bayern: Rauschgiftsüchtige', *Die Zeit*, 23 August 1956.

⁵⁴ 'Der verbrecherische Rausch', *Die Zeit*, 27 May 1966, sec. Gesellschaft; Rudolf Walter Leonhardt, 'Haschisch, Himmel und Hölle', *Die Zeit*, 17 January 1969; R. W. Leonhardt, 'Der Haschisch-Terror geht um', *Die Zeit*, 19 September 1969, sec. Kultur.

⁵⁵ Jutta Kamke, 'Nicht mehr das Paradies', *Die Zeit*, 21 June 1974.

⁵⁶ 'Wie das Hasch-Experiment im holländischen Enschede kaputtgemacht wurde' Klaus Pokatzky, 'Die Dealer frohlocken', *Die Zeit*, 26 November 1982, sec. Wissen.

⁵⁷ 'Wenn die deutschen Behörden schon kein Interesse an dieser Arbeit haben, warum sollten wir dann?' Klaus Pokatzky, 'Holland ist nicht mehr das Mekka der Süchtigen: Aussteigen in Amsterdam', *Die Zeit*, 3 December 1982.

Overall the *Zeit* seemed to try to argue its position far more by stating facts that will push the reader to approve of one method (Dutch) and disapprove of another. In the same article, the fact that the social workers of the organisation were protected from having to testify against their clients in court was contrasted with the German situation for *sozialwerker*. No judgement was given but neither was it necessary:

'In the Netherlands the four social workers, who every day take care of 15 to 20 young German citizens, have the right to refuse testimony about what their clients tell them in confidence, unlike their counterparts in Germany. And no Dutch public prosecutor would probably even dream of the idea to seize the client file of a drug counselling centre.'⁵⁸

In a final rebuke, one of the social workers explained that the conflation of hashish and heroin in German policy was illogical, since when the dire warnings on the former turn out to be false, many people would assume that the danger of heroin is also exaggerated.

The contrasting of the human cost of the German policy with the more humane Dutch one continued in another article about addicts in the Netherlands from 1985. A German former addict who got clean after several Dutch therapies on whether he could have done it in Germany said: 'I wouldn't have stood a chance over there.'⁵⁹

The indirect criticism of the German discussion on drugs is also evident in a 1998 article on the introduction of methadone programs in Germany. Beyond retelling the positive experience the replacement drug of other countries such as the Netherlands, it listed a number of views of opponents. Amongst them the *Drogenbeauftragter* for the state of Hessen who said he was afraid the number of dead drug addicts would actually *rise* with use of the drug. Also, that of a Viennese neurologist and psychiatrist who claimed the methadone program is just a way to expand the repressive apparatus. Adding such remarks, especially from a somewhat random expert seems to be more about weakening the counterargument than balanced reporting, no matter how justified.

After the 1980s, as the German authorities cautiously started to come aboard to the idea of focusing a little less on punishments and more on treatments, the number of articles looking at the Dutch drug policy goes down. One last reference can be found in a 1994 report in which a Dutch expert remarked that several German states are starting to copy the Dutch approach to hash.⁶⁰

Drugs policy overview

How to handle the abuse of both legal and illegal drugs is a subject that continues to be hotly debated throughout the world, a situation that is unlikely to stop anytime soon. The way *Die Zeit* and *Der Spiegel* report on the differences in the approach to illegal drugs in the two countries is surprisingly diverse. Reporting changes from focusing on the rise in heroin trade and related crime in the 1970s and early 80s to the treatment of addicts and the reduction of crime in the late 1980s and 90s. The differences between the Dutch and German systems are noted but early on they are seldom fully explored. As time progressed, more emphasis was put on the positive effects of the Dutch policy for addicts, though both newspapers continue to be quick to note the negative side as well.

Overall it was the *Zeit* that most clearly used the Netherlands as an example of what they seemingly felt was a wrongheaded approach in Germany. Though the newspaper was more careful than *Spiegel* to appear objective, the long string of articles on the subject and way

⁵⁸ 'Die vier Sozialarbeiter, die sich jeden Tag um 15 bis 20 junge Bundesbürger kümmern, genießen in den Niederlanden, anders als ihre Kollegen in der Bundesrepublik, ein Zeugnisverweigerungsrecht für das, was ihre Klienten ihnen anvertrauen. Auch im Traum käme wohl kein holländischer Staatsanwalt auf den Gedanken, die Klientenkartei einer Drogenberatungsstelle zu beschlagnahmen.' Ibid.

⁵⁹ 'Da hätte ich doch überhaupt keine Chance gehabt.'

Klaus Pokatzky, 'Ein Recht auf Sucht?', *Die Zeit*, 17 May 1985, sec. Wirtschaft.

⁶⁰ Kerstin Schweighöfer, 'Ein Koffieshop ist doch kein Supermarkt', *Die Zeit*, 11 February 1994.

they specifically and frequently contrast the Dutch measures with the situation in Germany seem clearly aimed to convince the reader of the better approach of the Dutch. The focus here was particularly on how the addicts were treated.

But even the sometimes negative articles or remarks show an intriguing tendency to use the Netherlands as an example. After all, when the Dutch are used as a bad example, this still means the writers are looking at the country for solutions. In that regard, the relative lack of articles on Dutch drugs policy with regard to the German situation in later years may be telling.

3. Abortion

The history of abortion in Germany and the Netherlands

Another somewhat sensitive issue on which the Netherlands moved to a more liberal approach sooner than German politics is the matter of abortion. Not only is this a subject that to this day is highly sensitive on its own right, the memory of the ethical crimes of the Third Reich add a potentially extra layer in the German case. The early liberalisation of Dutch practice if not technically law, and the resulting decades of German women coming to the Netherlands for the procedure were likely to provoke revealing comments in German media. Both the Dutch penal code of 1886⁶¹ and the penal code of the German Empire, passed in 1871,⁶² officially outlawed all forms of *abortus provocatus*. Although the Dutch law didn't specify it, there was a general acceptance that the procedure was allowed in cases of medical necessity. Though attempts to codify this repeatedly failed, convictions were rare, since successful prosecution required proof that the unborn foetus was alive at the time of the procedure,⁶³ a threshold that was difficult to achieve.

In Germany, despite a steep drop in fertility after World War I,⁶⁴ which resulted in discussion on whether or not birth control advice should be given at all in medical clinics,⁶⁵ the laws on abortion were somewhat loosened. Not only was the procedure reduced from a serious crime to a standard one, if the woman performed it on herself, but in 1927, the highest court in the Weimar Republic, the *Reichsgericht*, ruled that the life of the mother was more important than that of the unborn embryo and that therefore abortion was legal when the life of the mother was in danger.⁶⁶

This relative similarity in the law of the two countries ended in the late 1960s. While there had been attempts to loosen the restriction on abortion in both the Netherlands and the FRG before then, they had been unsuccessful. Renewed vigour in the opposition to the criminalisation of abortion resulted in changes from different directions, which ultimately lead to different results.

In the Netherlands, the change came primarily from the grassroots. The rise in the late 1960s of feminist protest groups such as the *Dolle Mina's* (who were 'probably [the] funniest offshoot of the Women's Lib movement in Europe' according to *Der Spiegel*)⁶⁷ and *Rooie Vrouwen* resulted in the formation of the *Stichting voor medisch verantwoorde zwangerschapsonderbreking* (Foundation for medically justified abortion) which used gifts from the public to build a string of abortion clinics in cities across the Netherlands.⁶⁸ While officially ending a pregnancy was still only allowed on medical grounds, in practice the government left them be and criminal investigation only followed when serious problems occurred during the procedure. While officially the indication model, which meant abortion was only allowed for specific reasons, continued to be in force, in practice the Netherlands had gone over to a *Fristenmodell*, where the only important criterion was the time since conception. This difference between theory and practice was mostly resolved in changes to the law, which passed in 1980 and went into effect in 1984, though not completely: formally the woman still had to be in an 'emergency situation', however this was left completely to the discretion of the woman herself.

⁶¹ Mark Levels, *Abortion Laws in Europe between 1960 and 2010: Legislative Developments and Their Consequences for Women's Reproductive Decision-Making* (Nijmegen, 2011), 66.

⁶² *Ibid.*, 54.

⁶³ Mechteld Renee Maria Visser, ed., *Evaluatie: Wet afbreking zwangerschap* (Den Haag, 2005), 24.

⁶⁴ Atina Grossmann, *Reforming Sex: The German Movement for Birth Control and Abortion Reform, 1920-1950* (New York, 1995), 4.

⁶⁵ *Ibid.*, 21.

⁶⁶ Ewald Hettrdt, *Die Auseinandersetzung um das Schwangerenberatungsgesetz: eine Studie zum Einfluss der Parteien im Regierungssystem der Bundesrepublik Deutschland* (Bonn, 1992), 20.

⁶⁷ 'Niederlande: Es passiert', *Der Spiegel*, 26 March 1973, 130.

⁶⁸ Visser, *Evaluatie: Wet afbreking zwangerschap*, 25.

Meanwhile, the election in Germany of the first post-war government led by the social democrats in September 1969, resulted in the formulation of a new law that would create clear guidelines under which abortion would be legal in the first three months, including the 'social indication' which would allow the procedure if the situation of the woman ('*lebensumstände der Frau*') didn't allow for a child.⁶⁹ In practice this would have been a similar movement as that of the aforementioned *Fristenmodell* in the Netherlands. After much back and forth the law came into force in June 1974, however an immediate appeal by the opposition and several *Bundesländer* resulted in the law being declared unconstitutional in 1975, on the grounds that the law didn't take the life of the child enough into consideration. Ironically, during this period in a number of countries the reverse happened: constitutional courts in the USA (1973), Austria (1974) France (1975) and Italy (1975) all declared laws *against* abortion illegal. Another salient detail is that the GDR had already legalised abortion in 1972,⁷⁰ several years before the attempted law came into effect in West-Germany. After the rejection by the courts, an adapted version of the law was passed in 1976.⁷¹ However, this meant the German rules remained among the strictest in Europe, after Ireland and Poland, and there was a significant difference in the practices between *Bundesländer* and between larger cities and the countryside.

A final surge of discussion came about during unification, when the strict law of West-Germany had to be combined with the liberal practice in the East. After a transition period in which both countries kept their previous rules, the ultimate compromise was quasi-Dutch: abortion without a strong reason would remain illegal; however the only real sanction was that it would not be paid for by the health insurance. This of course still put poorer women into trouble, but the overall costs were comparable to the earlier 'buses to Holland'. One small remark should be made that despite the understandable careful navigating that is generally done in post-war Germany when human life is concerned (see also the section on euthanasia), this seems less of an issue with abortion. The comparison was, of course, brought up occasionally by opponents, but overall it was hardly remarked on. This is something that was also apparent in the reporting.

German news media on abortion

Both of the newspapers looked at fielded a long campaign against '§ 218', the paragraph of the penal code concerning abortion. In the 1960s, *Der Spiegel* limited itself to reporting on attempts to change the law, such as in a 1966 article that mourned the idea that the penal code of 1871 had a good chance of turning 100⁷². During the deliberation about the new law in the 1970s, *Die Zeit* commented on the fact that the members of parliament who would vote on a law so connected with the female experience were overwhelmingly men (93%). It called upon the reader who would 'call this normal, smart or Gods will' how they would view the opposite: a large majority of women, after long public discussion, and weighing of public versus religious interest deciding what men could do with their genitalia.⁷³ It should be clear from this 1974 article that the *Zeit* very much agreed with the opinion that the law should be changed. This could further be seen in a string of articles during the 1970s⁷⁴ and 1980s.⁷⁵

⁶⁹ Hetrodt, *Die Auseinandersetzung um das Schwangerenberatungsgesetz*, 22.

⁷⁰ Grossmann, *Reforming Sex*, 22.

⁷¹ Levels, *Abortion Laws in Europe between 1960 and 2010*, 55.

⁷² 'Strafrechtsreform: Vorerst gar nichts', *Der Spiegel*, 17 January 1966, 21.

⁷³ Petra Kipphoff, 'Der Paragraph als Vogelscheuche', *Die Zeit*, 26 April 1974, sec. Wissen.

⁷⁴ Eva Marie von Münch, '§ 218: die neue Fassung in der Praxis: Immer noch gehen viele Frauen nach Holland', *Die Zeit*, 6 May 1977; Ronald Granz, '§ 218: Die Tour der Erniedrigung', *Die Zeit*, 22 July 1977; Heribert v. Koerber, 'Abtreibung nach dem Tage X', *Die Zeit*, 29 March 1974.

⁷⁵ Margrit Gerste, 'Sollen sie wieder nach Holland fahren?', *Die Zeit*, 20 January 1984; 'Erforscht und erfunden', *Die Zeit*, 9 November 1990, sec. Wissen; Birgit Schwarz, 'Frauen in Frage stellt: Verschärfen oder streichen?', *Die Zeit*, 16 February 1990, sec. Gesellschaft; Margrit Gerste, 'Die Fristenlösung muß doch her!', *Die Zeit*, 5 December 1980.

However, unlike in the reporting on drug policy, where the Dutch example was used to argue that there at least should be discussion, the newspapers were less concerned with how the Dutch approached the question of abortion. Partly this may have been a result of how long this issue had already been discussed in Germany (the first article in the *Zeit* about the subject was published in 1951⁷⁶). But more importantly perhaps was that at the time the first abortion clinics opened in the Netherlands in 1970, German politics was heavily involved in the process of hashing out the details of the new abortion law. This may explain why relatively little attention is paid to the details in the Netherlands, even when many articles reference the large number of German women going to the Netherlands to have an abortion: at the time the Dutch policy of condoning but not legalizing may have felt slow and outdated, compared to a brisk new law being prepared in Germany.

One of the few articles concerning itself with the Dutch clinics was published in 1973. A mostly general overview of how they came into being and work, it seemingly showed little judgement with one exception: it favourably compared them to British clinics. Proclaiming that London had a 'business and assembly line atmosphere', while The Hague was 'like being at your mom's'.⁷⁷ The *Spiegel* also explicitly named the address of the abortion clinic in the article, making clear on which side of the discussion it stood.

Despite this early, rather positive report, the prospect of an encompassing law in Germany as opposed to the for some rather dubious skirting of legal details in the Netherlands may have been the cause of articles such as a 1974 one in the *Spiegel*, which argues that the Netherlands were not an ideal model for Germany, even though the country was one of the 'Abtreibungsparadiese' (abortion paradises) of German women. Even then, though, the article used the Dutch experience as an example in that the policy of not prosecuting abortion had led to 'neither a moral swamp, nor murder and manslaughter'.⁷⁸ Damning with faith praise it may have been, but an example nonetheless.

Another reason to conclude that the new comprehensive new law on abortion may have been a cause for the tepid attention towards the Netherlands could also be found in the opposite situation: what was written after the law had failed. In 1984, nine years after the rejection of the law by the German supreme court, the *Spiegel* gave a much more positive description of the Dutch practice than it did before. Recalling the earlier situation it stated that 'Abortion wasn't legally allowed yet, but Holland's specialised clinics thrived under state control, unmolested by prosecutors. Thousands of German women and girls found in help in the Netherlands'.⁷⁹ Four years later the publication could be described as being almost lyrical in its description of the advantages of the more liberal policy in the Netherlands:

'How it can be done differently and better is shown by the Dutch. Over there women are almost never punished for an illegal abortion, and have to overcome few bureaucratic hurdles. Nevertheless, the Netherlands have fewer abortions than most other European countries.

This amazing phenomenon is easily explained by scientists. Instead of going on about financial assistance or the obligation to "protect unborn life" (*Beratungsgesetz*) in Holland the focus is on contraception education.⁸⁰

⁷⁶ '§ 218: Gestehen Sie doch', *Der Spiegel*, 28 February 1951, 9.

⁷⁷ 'Niederlande: Es passiert', 130.

⁷⁸ 'weder den moralischen Sumpf noch Mord und Totschlag zur Folge hatte' Kipphoff, 'Der Paragraph als Vogelscheuche'.

⁷⁹ 'Der Abortus war gesetzlich noch nicht erlaubt, aber Hollands Spezialkliniken florierten unter staatlicher Kontrolle, unbehelligt von Staatsanwälten. Auch Tausende deutscher Frauen und Mädchen fanden in Holland Hilfe.' '„Ganz weg sein - das ist am leckersten"', 148.

⁸⁰ 'Wie es auch anders und besser funktioniert, beweisen die Holländer. Dort werden Frauen wegen eines illegalen Schwangerschaftsabbruchs so gut wie nie bestraft. Außerdem müssen sie nur wenige bürokratische Hürden überwinden. Trotzdem wird in den Niederlanden weniger abgetrieben als in den meisten anderen europäischen Staaten.

This is a comment that, while certainly proclaiming the advantages of a more liberal policy towards abortion, is more of a celebration of pragmatism and openness, in contrast to the German tendencies.

Die Zeit is even less concerned with reporting on the changes during the 1970s in the Netherlands than the *Spiegel*. After the abortion law of 1974 had been rejected by the *Bundesverfassungsgericht*, the *Zeit* featured an article that compared West-Germany with other countries but remarkably, did not include the Netherlands.⁸¹ One could argue, though, that this was because the situation there was too well known, with thousands of German women making the trip every year. It should also be noted that the relative dearth of reporting on abortion abroad wasn't restricted to the Dutch, but also applied to other countries with a more liberal policy. Beyond a couple of articles such as this one, that gave a brief overview of the legal situation in other countries, there were only a handful that explicitly discussed the situation or development in countries such as France, the USA or the UK. It is clear that this was a subject where the experience of other countries was felt to be of less interest.

One point for which the Netherlands is often mentioned in *Zeit* articles about abortion is the lower rate of abortion (as seen above in *Der Spiegel*). For example, in a 1986 editorial discussing the German remarked that the only point was how the country dealt with women who found themselves in an unwanted pregnancy. The restrictive German response, however 'has not created the lowest abortion rates. Those you'll find in liberal Holland.'⁸² And in 1990, during an attempt in Germany to criminalise abortion completely outside of medical necessity, *Die Zeit* used the Netherlands as an example of a place where the handling of the subject 'free from polarizing or moral judgement, had definitively not led to that which the opponents of liberalisation tried to argue: the replacement of all birth control by mass abortion.'⁸³

One somewhat indirect way in which the Netherlands were mentioned in articles on abortion was the frequent mention of women using the Netherlands as route towards abortion, or of how many did so.⁸⁴ The importance of this route cannot just be seen in the reporting itself. In several articles women mention being told to use the option. It seems that the existence of the Dutch route made it possible for some not to have to wrestle too deeply with the subject. When a pregnant woman who was not allowed an abortion, asked what she should do now, the attending physician answered with a curt: 'Just go to Holland!'⁸⁵

Abortion overview

Overall, the reporting on the abortion discussion and policy changes in the Netherlands was quite limited in both *Die Zeit* and *Der Spiegel*. The Dutch approach was never explicitly reported on as an example, for either bad or good. This may have been the result of the

Das erstaunliche Phänomen erklärt sich für die Wissenschaftler ganz einfach. Statt über Finanzhilfen oder die Pflicht zum "Schutz des ungeborenen Lebens" (Beratungsgesetz) wird in Holland vor allem über Verhütung aufgeklärt.'

'Abtreibung: Ohne Durchblick', *Der Spiegel*, 11 April 1988, 54.

⁸¹ '§ 218: Wo man mehr an die Frauen denkt', *Die Zeit*, 7 March 1975.

⁸² 'Es geht allein um die spezifische Konfliktsituation, in der Frauen sich befinden, die ungewollt schwanger werden. Unsere Antwort darauf ist – trotz Notlagenindikation – eine der restriktivsten in Europa, was aber nicht dazu geführt hat, daß wir die niedrigsten Abbruchzahlen haben. Die hat das liberale Holland.' Margrit Gerste, 'Eine Aktion wider den Zeitgeist', *Die Zeit*, 10 October 1986, sec. Wissen.

⁸³ '[Das der] von Polemisierung und moralischer Verurteilung freie Umgang keineswegs zu dem geführt, was die Gegner einer Liberalisierung glauben machen möchten: zum Ersatz jeglicher Verhütung durch massenhafte Abtreibung.' Schwarz, 'Frauen in Frage stellt'.

⁸⁴ 'Abtreibung: Weg zur Engelmacherin', *Der Spiegel*, 4 September 1978, 46.

⁸⁵ 'Fahren Sie doch nach Holland!'

Susanne Neumann, 'Abtreibung: Ab nach Holland', *Die Zeit*, 14 July 1989.

expected changes in German law, which made other examples less useful. Not only did the period in which the German government worked on the new law (1969-1975) coincide with the loosening of restrictions in the Netherlands, but the Dutch approach perhaps reminded the Germans too much of how they had dealt with the problem before. The stretching of definitions and restraining on part of the prosecution in the Netherlands was superficially quite similar to what had been done in Germany before this period to circumvent the 19th century law.

Still, due to the tens of thousands of women who went to the Netherlands over a long period of time in the 1970s and 1980s meant that a mention of the Netherlands was close to inescapable in articles about the German discussion. Both the way women were treated in the Netherlands and the overall results were mentioned more and more as time passed. The fact that the policy did not lead to a moral wasteland in general and to far fewer abortions per capita than in Germany in particular was frequently used as an example by both newspapers.

In short, while the subject of abortion did not lead to a significant number of articles comparing and contrasting the Dutch and German experience, there are still many examples where the Dutch experience was used as an illustration of what was wrong with the German system or how it could be improved. Particularly, both papers put an emphasis on the treatment of the women in question. They were implying or outright stating that the German way did not always achieve the best or most humane results.

4. Euthanasia

Euthanasia in Germany and the Netherlands

Euthanasia (from Greek, meaning 'good death')⁸⁶ is the term used in many countries and languages to separate the ending of a life to relieve intractable suffering from simple murder. An exception is Germany where, due to usage of the term by the Third Reich, it has been contaminated to such an extent that in most cases *Sterbehilfe* is used instead.⁸⁷ This taint of the concept due to history has meant a stronger reluctance in Germany to allow or even discuss some form of euthanasia compared to other governments. At the same time the Netherlands, after several decades of discussion, was one of the first countries to officially allow physician-assisted suicide in 2002⁸⁸. The clear gap in policy between the two countries, and the ethical complexity of this subject means that strong reactions in the media are to be expected.

This section will give a short overview of the background of the subject in both countries and will look at the way the German publications talked about the subject in general and how they described and commented on the changes that took place in the Netherlands in the last few decades. Finally it will look at how, if at all, the fall of the Berlin Wall and reunification changed the reaction of German news publications on this subject.

The German handling of euthanasia is, like so many subjects relating to ethical questions, strongly intertwined by the experiences during the Third Reich. The eugenics programs of the *Nationalsozialisten* (NS) which, among other things, used the label of euthanasia for the killing of 'unworthy' people have created a taboo not just on the subject but on the name itself.

Ideas on using medicine to limit the balance of different ethnic and especially social groups was widespread at the beginning of the 20th century in Germany⁸⁹ and other European powers, which, in combination with the prevalent racial theories could lead to some remarkable positions. Bertrand Russell, one of the founders of analytical philosophy, declared that although 'negroes [where inferior] their extermination (apart from questions of humanity) would be highly undesirable,' but only because their labour was needed in the tropics.⁹⁰

Such discussion about 'undesirables' did not concern just race, but also the parts of society thought to be weak or deficient. In Germany, jurist Karl Binding and psychiatrist Alfred Hoche wrote an influential essay in 1920 in which they made an explicit separation between productive and unproductive members of society. Hoche emphasised the burden that, for example, mentally handicapped put on society, and the '*ungeheure Kapital*' (immense capital) it took simply to feed and clothe them.⁹¹ At the same time he was certain that the '100 percent correct selection' of patients or whom it was 'impossible they would improve' could be done. Binding concentrated on the legal side, proposing a three person panel, consisting of a psychiatrist, a medical doctor and a legal expert who would watch over the process in general and the rights of the doctor in particular. He also claimed this would consist of an improvement for the patients, who could change their mind at all times.

When the NSDAP took power in 1933, a propaganda campaign was waged on behalf of euthanasia. This took its playbook from Binding; emphasizing the cost of care for mentally and physically handicapped and the idea that it would be an improvement for the patients themselves. An example of this was the book *Sendung und Gewissen*, released in 1936 by

⁸⁶ Udo Benzenhöfer, *Der gute Tod?: Geschichte der Euthanasie und Sterbehilfe* (Göttingen, 2009), 9.

⁸⁷ Alexandra von Kühlmann, *Sterbehilfe: eine Studie geltenden Rechtes in Deutschland, Österreich, der Schweiz und den Niederlanden* (Aachen, 1995), 5.

⁸⁸ Lieverse, *Dood gewoon?*, 65.

⁸⁹ Robert Neel Proctor, *Racial Hygiene: Medicine under the Nazis* (Cambridge, Mass., 1988), 16.

⁹⁰ Bertrand Arthur William Russell, *Marriage and Morals* (London, 1927), 266.

⁹¹ Karl Binding and Alfred Hoche, *Die Freigabe der Vernichtung lebensunwerten Lebens* (Leipzig, 1920).

Hellmuth Unger. In this novel a righteous medical professor administers a morphine overdose to his wife, who is suffering from multiple sclerosis (MS). In the following court case he defends himself with the argument that it was a 'humane act'.⁹² Unsurprisingly he is acquitted.

This book, and even more so its 1941 movie adaptation *Ich Klage An* ('I accuse'), were conscious attempts to make the German public receptive to the 'cleansings' that would follow or were already underway. This went so far that the heads of the Nazi euthanasia program *Aktion T4* (including by then Unger) re-cut the film even after it had been released. Internal memos show there was concern that the explicit mentioning of MS could lead to unrest amongst victims of the disease and their friends and family. Later internal research reports showed that the film was successful in its aims of convincing the public of the humanity of the program and that the remaining concerns could be reduced by placing the killings in a medical framework.⁹³

The effects of such propaganda, even if it had little to do with the actual killings taking place, could be felt decades after the war. During interviews in the early 1980s of doctors who worked during the Nazi era, many of them still felt the impact and vividly recalled the long discussions with colleagues and students about the morality of euthanasia for the incurably ill.⁹⁴

The somewhat atypical cautionary approach of the regime with regard to the sentiments of the public was likely due to the early start of the program and especially the type of victim. In contrast to other atrocities, the program was not aimed at people who were part of a demonised ethnical or political group but were part of the general population. On top of this they could be members of any social layer. As a result, the program was sold as much as possible as a sensible, well thought out and a humane policy.

This could also be seen in the way the actual killings were executed. Facilities where children received a deadly poison after a couple weeks of observations were called *kinderfachabteilungen* (department of child specialism) both internally and to the outside world. Their death would be fashioned in such that the cause of death could plausibly be given as natural. By slowly starving them, exposing them to cold and by choice of poison the cause of death could believably be given as pneumonia or some other common disease.⁹⁵ Even in internal documents it was referred to as a *Gnadentod* (mercy death) and, just like Binding suggested before the war, a three-expert panel supposedly checked if the death was done according to the rules, though this was done without any reference to a patient or medical file.⁹⁶

As the war progressed, the brutality of the methods increased while its concealment became less, and in most occupied territories the regime was far less concerned with public opinion. Still, the connection between these gruesome acts and their representation as logical and humane actions is etched in the collective memory of Germany. The systematic involvement of medical professionals was, according to one author 'the most shameful of all Nazi behaviour'.⁹⁷

As we will see, the similarities between the way euthanasia was represented in Nazi-era Germany and how it is discussed and implemented in the Netherlands in the 21st century are strong. Ending the suffering of patients as a motivator, the creation of panels who regulate the practice, the emphatic defence of the human right to determine one's own ending: they all have strong echoes in the practices occurring 1938-1945.

⁹² Ernst Klee, *'Euthanasie' im NS-Staat: die 'Vernichtung lebensunwerten Lebens'* (Frankfurt am Main, 1983), 342.

⁹³ *Ibid.*, 345.

⁹⁴ Robert Jay Lifton, *The Nazi Doctors: Medical Killing and the Psychology of Genocide* (New York, 1986), 49.

⁹⁵ Proctor, *Racial Hygiene*, 187.

⁹⁶ Lifton, *The Nazi Doctors*, 52.

⁹⁷ *Ibid.*, 4.

German media and euthanasia

In the first years after the war little attention was paid to the subject, except for a few short and factual articles about cases in the US. This changed in the early 1960s, when there appeared to be a renewed interest in dealing with the atrocities committed during the Third Reich in general and prosecuting the perpetrators in particular.

In 1959, it was discovered that Werner Heyde, one of the architects of the *Aktion T4* program, was openly living in Schleswig-Holstein, despite a current warrant for his arrest. The situation turned somewhat farcical when the public prosecutor in charge of the investigation on how this could have happened was forced to step down after it was revealed he himself was involved in the cover-up.⁹⁸

As a result of the renewed attention to the subject, a number of new cases were started against 'Euthanasie Ärzte' and other participants and more details reached the public. When one public prosecutor accused a defence lawyer of having taken part in the NS regime, the latter even defended himself by arguing he was very critical in the way he looked at 'Euthanasie(Gnadentod-)' cases. (Note that no quotation marks are used for the term).⁹⁹ The cases against WW II doctors had been ended in 1949 because they supposedly had no *Unrechtsbewusstsein*, that is no knowledge that it was illegal.¹⁰⁰ Further prosecution was stopped in 1961. It is possible that such stories might have increased the fear of excesses if legal assisted suicide were to be legally possible.

In a 1965 story about 14 nurses who were prosecuted for killing hundreds by lethal injection, the emphasis was on the motive: were they just following orders, not knowing they were illegal or did they commit their actions as a humane act? As one nurse testified: 'I have always provided my service to these patients with love and special patience.'¹⁰¹ From such quotes the reader might justifiably have developed a distrust of people claiming 'caring' as the reason to allow euthanasia. Overall, these early 1960s stories, in combination with the existing knowledge on the *Aktion T4* program, show the overall view in the media on the subject in Germany. The interest in the horror years continued, both in articles about court cases and in ones that extensively described the details of various misdeeds or in the form of printing primary sources such as Heinrich Himmler's correspondence.¹⁰²

Up until this time most discussion and news reports regarding euthanasia were on the crimes of the NS regime. The exceptions are stories about euthanasia in other countries. In one of the earliest examples, multiple articles containing a long series of diary entries from an American doctor include the lines 'But I think that those who claim that euthanasia could never be justified, should perhaps have the pleasure to care for one or two Mrs. Blombergs' (a long-suffering cancer patient).¹⁰³

The 1967 case of the English Neasden clinic, where the Chief of Medicine had changed the rules so that the seriously ill and infirm would not be resuscitated after a heart attack, unearthed a lot of discussion. It is here that a taboo on euthanasia for German doctors due to wartime experiences was first mentioned.¹⁰⁴ It was, however, certainly not an absolute taboo. In an 1967 interview a professor of neurology sets the possible limits for ending a life very broad; even someone who is paralyzed from the waste down should be a possible candidate for euthanasia:

⁹⁸ 'Voss: Litt und schied', *Der Spiegel*, 11 January 1961, 18.

⁹⁹ 'Rechtspflege: O doch', *Der Spiegel*, 1 February 1961, 25.

¹⁰⁰ 'Euthanasie: Kein Mord', *Der Spiegel*, 11 January 1961, 35.

¹⁰¹ 'Ich habe meinen Dienst an diesen Kranken immer mit Liebe und besonderer Geduld versehen.'

'Euthanasie: Immer mit Liebe', *Der Spiegel*, 3 March 1965, 26.

¹⁰² '„Achten sie auf die Zwiebel der Herbstzeitlose“', *Der Spiegel*, 19 February 1968, 60.

¹⁰³ 'Aber ich glaube, vielleicht sollten diejenigen, die behaupten, der Gnadentod ließe sich niemals rechtfertigen, einmal das Vergnügen haben, eine oder zwei Mrs. Blombergs zu pflegen.'

'Intern Dr. X', *Der Spiegel*, 23 May 1966, 66.

¹⁰⁴ 'Euthanasie / England: Hüllen ohne Hirn', *Der Spiegel*, 2 October 1967, 122.

'Next to him lies a young man who, on the first hot day of the summer, tried to jump head first into the cool wetness. Unfortunately the water wasn't deep enough and he bruised his neck vertebrae. Meticulous care was given to the healthy head with the paralysed body attached to it. What a life! If the preserved head had at least been that of a poet or a divinely inspired mystic. But the young man hadn't even been able to complete his fourth year of secondary school, and lacked any mental talents and interests. Without a body, this head is worthless.'¹⁰⁵

A survey published on the subject by the *Spiegel* in the same year shows the public was not strongly against the practice. On the question whether a doctor should be allowed to end the suffering of someone who is incurably ill 53% agreed. Even among evangelical and catholic churchgoers the yes/no share was fairly high with 41% yes and 51% no for the former and 29/69% for the latter.¹⁰⁶ However when a change in the criminal code was suggested that would end punishments for suicide and change other rules related to death by unnatural causes, a federal judge drew a clear line between giving pain relief that speeds up death and purposefully ending a life. The latter was immediately equated with the NS regime: 'euthanasia within the meaning of National Socialism, the 'destruction of life unworthy of life', on the other hand remained invariably murder. According to him it had nothing to do with euthanasia.'¹⁰⁷

In Germany the situation is clear: the examples of the past keep a strict line in the sand as to how far doctors may go. In the Netherlands this was of course not the case. As a result the early seventies Dutch euthanasia case 'Postma-van Boven' changed much in both countries.¹⁰⁸ Geertruida Postma-van Boven was a family doctor who, together with her husband, gave her infirm mother a lethal dose of morphine after the mother had asked, and been denied on multiple occasions an end to her life. The couple reported their action to the head of the nursing home, who in turn alerted the authorities. When patients of the two doctors started a petition to support them the case became big news first in the national press and soon after internationally. A story in *Der Spiegel* stated, for the first time, that the ethical quandary of what to do in situations where passive ending of life by withdrawing care was a 'daily presence' in Germany. One neurosurgeon interviewed for the story went further: 'The goal of all medical efforts should only be a life good enough to have human dignity, according to [the surgeon]. He called for 'the right to die' for patients without consciousness, who just sleep on.'¹⁰⁹

Similarly in a review of a book which tells the story of one euthanasia, the reviewer, explicitly mentioned as a concentration camp survivor ultimately came to the conclusion that 'this publication is timely and necessary' and that since voluntary euthanasia had little chance of becoming law 'The freely chosen death [(suicide)], [is] the only chance of a truly dignified death.'¹¹⁰

¹⁰⁵ 'Nebenan liegt ein junger Mann, der am ersten heißen Tag im Sommer mit einem Kopfsprung ins kühle Naß wollte. Das Wasser war an dieser Stelle leider nicht tief genug. Er verrenkte sich die Halswirbel. Sorgfältigste Pflege erhielt den gesunden Kopf mit dem daranhängenden gelähmten Körper am Leben. Was für ein Leben! Wenn der erhaltene Kopf wenigstens noch ein Dichter wäre oder ein gottbegnadeter Mystiker. Aber der junge Mann hatte nicht einmal die Untertertia geschafft, und geistige Fähigkeiten und Interessen fehlten ihm völlig.' '„Das Recht zu sterben“', *Der Spiegel*, 2 October 1967, 125.

¹⁰⁶ 'Kirche / Glauben: Diesseits und Jenseits', *Der Spiegel*, 18 December 1967, 57.

¹⁰⁷ 'Euthanasie im Sinne des Nationalsozialismus, die 'Vernichtung lebensunwerten Lebens', bleibt dagegen ausnahmslos vorsätzliche Tötung. Sie hat mit Sterbehilfe nichts zu tun.'

'„Mit Tabus und Vorurteilen aufgeräumt“', *Der Spiegel*, 27 January 1970, 85.

¹⁰⁸ Michael Friß, 'Komm süßer Tod' - *Europa auf dem Weg zur Euthanasie? Zur theologischen Akzeptanz von assistiertem Suizid und aktiver Sterbehilfe*. (Stuttgart, 2008), 32.

¹⁰⁹ 'Nur ein 'menschenswürdiges, dem Menschen adäquates Leben', so [der Chirurg], dürfe Ziel allen ärztlichen Bemühens sein. Er fordert für Patienten, die ohne Bewußtsein unrettbar dahindämmern, „das Recht zu sterben'.' '„Das Recht zu sterben“', 74.

¹¹⁰ 'diese Veröffentlichung [ist] aktuell und notwendig. [...] Denn vielleicht ist -- da doch die freiwillige Euthanasie offenbar noch wenig Chancen hat, vor dem Gesetz anerkannt zu werden -- der frei gewählte Tod die

Die Zeit was more worried about the consequences of the Postma case. When she received a mostly symbolical one week suspended sentence, they urged her not to appeal since '[we] should not want to create free passes for an action for which there will perhaps never be a generally accepted justification.'¹¹¹

Both the Dutch case and the book created a large amount of discussion, not just in news magazines but on TV as well.¹¹² This discussion continued into the new year, both on TV¹¹³, and in print. In February 1975 *Der Spiegel* dedicated a special to the subject.¹¹⁴ This naturally meant renewed attention for *Aktion T4*,¹¹⁵ but also an article on an American example¹¹⁶, an interview with a Swiss internist who admitted to sometimes stopping food for hopeless cases.¹¹⁷ In the main editorial the dilemma was compared to abortion. It is notable that the emphasis of *Der Spiegel* seems to have changed. Where before 1973 the focus with regard to euthanasia was very much on the crimes of the NS-regime, the articles after this period emphasized the ethical dilemma of doctors forcing medical treatment on people against their will. One example given was that of a doctor suffering from cancer. After he was first reanimated he thanked his colleges and asked them not to reanimate him again. Despite this he was brought back four more times and finally died, but only because the life-support machine took too long to get to him.¹¹⁸

After this there were no articles in the *Spiegel* reporting on euthanasia in the Netherlands for more than a decade, not even when the Dutch High court allowed some forms of passive euthanasia in 1984. The first mention after the 1975 article was when the Dutch parliament voted on a law to partly legalise euthanasia in 1986.¹¹⁹ The article once again emphasised both the suffering of some patients and the fact the assisted suicide was already present in everyday medical care; the only difference was that it was not officially sanctioned. A 1989 editorial, however, warned of the danger of death becoming less a last resort and more of 'market driven choice'. Other countries that were quicker to move towards legalised euthanasia 'don't have the German history' which had 'taught Germans something'¹²⁰

Die Zeit continued in its even-handed but far more worried reporting, both on euthanasia in the Netherlands and in Germany.

After the fall of the Berlin Wall much changed in both countries. For several years Germany was preoccupied with incorporating the former GDR into its structures. Amongst the questions to be solved were the different approaches to ethical questions. Euthanasia, however, was not one of those questions, since the two countries differed little in their approach. Meanwhile, in the Netherlands the first post-war government without a confessional party was formed in 1994. This meant a significant number of legal and ethical

einzigste Chance eines wahrhaft würdigen Sterbens.'

'Jean Améry über Paul Moor: „Die Freiheit zum Tode“: Vor Einbruch der Nacht', *Der Spiegel*, 19 November 1973, 188.

¹¹¹ '[Wir] dürfen keine Freifahrtscheine erzwingen wollen für ein Tun, für dessen Rechtfertigung es allgemeingültige Maßstäbe vielleicht niemals geben wird.'

Theo Löbsack, 'Euthanasie-Prozeß: Ein salomonisches Urteil', *Die Zeit*, 2 March 1973, 60.

¹¹² 'Diese Woche im Fernsehen', *Der Spiegel*, 9 April 1973, 192.

'Diese Woche im Fernsehen', *Der Spiegel*, 23 April 1973, 184.

'Diese Woche im Fernsehen', *Der Spiegel*, 9 June 1973, 120.

'Diese Woche im Fernsehen', *Der Spiegel*, 3 December 1973, 216.

'Diese Woche im Fernsehen', *Der Spiegel*, 24 December 1973, 104.

¹¹³ 'Diese Woche im Fernsehen', *Der Spiegel*, 4 March 1974, 143.

'Diese Woche im Fernsehen', *Der Spiegel*, 28 October 1974, 208.

'Diese Woche im Fernsehen', *Der Spiegel*, 4 November 1974, 223.

'Diese Woche im Fernsehen', *Der Spiegel*, 2 December 1974, 192.

¹¹⁴ *Der Spiegel*, 10 February 1975.

¹¹⁵ '„Aktion T 4“ - Todesurteil nach der Kartei', *Der Spiegel*, 10 February 1975, 48.

¹¹⁶ 'Euthanasie-Testament in USA', *Der Spiegel*, 10 February 1975, 56.

¹¹⁷ 'Todkranke auf Kalorie Null gesetzt', *Der Spiegel*, 10 February 1975, 42.

¹¹⁸ 'Sterbehilfe - der Tod als Freund', *Der Spiegel*, 10 February 1975, 56.

¹¹⁹ 'Niederlande: Vom Leiden erlöst', *Der Spiegel*, 10 February 1986, 138.

¹²⁰ Klaus Dörner, 'Wenn Mitleid tödlich wird', *Der Spiegel*, 21 August 1989, 173.

stalemates could be resolved. One of these was euthanasia, with the first attempt to create more of a distance between the act and possible prosecution coming in 1998¹²¹, while a definitive legalization started in 2002.

Die Zeit continued its guarded approval, arguing that the Dutch law gave more freedom but risked qualifying the right to life for ill and handicapped people. It also predicted that more European countries would follow¹²² and was of the opinion that if the same number of doctors continued practicing euthanasia in secret, outside of the new system, the law would be removed, piece by piece.¹²³ The tone of the *Spiegel* turned far more negative. Shortly after the law was approved, the concern was that this would not be the end, and that many doctors were reluctant to kill their patients.¹²⁴ In a 2004 article they claim Dutch doctors were killing patients against their will, without consequences from the state. Beyond that they claimed that 'many people' carry documents with them with the plea: 'Don't kill me, doctor'.¹²⁵ The main fear appears to be the idea that 'the most liberal euthanasia law in the world' would be further expanded. Clearly the authors were letting fears come to the foreground that were only tangibly referred to before the law became official: that to allow some form of assisted suicide truly is like a dam breaking, letting the ethical situation deteriorate rapidly. Not that this didn't happen before the law. An expansive 1977 article on the '*Feldversuch Holland*', in spite of attempting not to tip the scales, quickly arrived at the horror stories, such as a daughter who would like the euthanasia of her mother to happen as fast as possible, since she would not receive a refund if she missed her holiday.¹²⁶ Clearly the fear of what could happen had been present from the start.

This seems to be the current state of affairs. There has been little movement in the German or Dutch law since then. Meanwhile, the occasional article will describe both the good parts of the law as well as articulate the always present fear of a slippery slope.¹²⁷ This continued interest shows the question of how to deal with the people wanting to end their life is alive in Germany – but so is the fear of repeating past mistakes.

Euthanasia overview

Like in the case of drugs policy, the legal situation in the Netherlands not only provoked much discussion in the country itself, but also in other countries. On top of this, due to how controversial the topic was and is, there is significant concern within the Netherlands on how the outside world views the policy. Analysis of Dutch newspapers during the period describe how the discussion went, while foreign newspapers spend a significant amount of attention on it,¹²⁸ including in Germany itself as we've seen.

As discussed before, the word itself is avoided in German newspapers, due to its strong connection to the crimes of the National Socialists. However, removing the word itself obviously does not remove the connection to those horrible acts. As a result, any discussion in German media, while acknowledging the long-time suffering of some patients, quickly moves towards the 'slippery slope' argument with the dystopian end result of a society where humans are 'unfit to live'.

One question is whether fear of horrendous escalation is a purely German one, or related to the image they have of the Netherlands. Is it the idea that the 'tolerant' Dutch would tolerate anything, as long as they are not bothered by it themselves? Or perhaps the view that the Dutch are like the pre-war Germans, naïve in their assumption of how quickly these things

¹²¹ Lieveerse, *Dood gewoon?*, 64.

¹²² 'Sterben können', *Die Zeit*, 27 March 2002, sec. Politik.

¹²³ Schüle, 'Sterbehilfe: Frei bis in den Tod', *Die Zeit*, 8 August 2002, sec. Wissen.

¹²⁴ Günther Stockinger, 'Niederlande: Letzte Hilfe', *Der Spiegel*, 4 December 2000, 248.

¹²⁵ Erich Wiedemann, 'Niederlande: Der Gedanke des Tötens', *Der Spiegel*, 19 July 2004, 86.

¹²⁶ Elisabeth Wehrmann, 'Der nicht spontane Tod', *Die Zeit*, 16 May 1997.

¹²⁷ Laura Höflinger, 'Euthanasie: Mein Wille geschehe', *Der Spiegel*, 31 January 2015, 112.

¹²⁸ Swantje Naunin, *Sterben auf Niederländisch?: niederländische 'euthanasie' als Gegenstand der Debatte in Deutschland und den Niederlanden* (Berlin, 2012), 171.

can escalate towards barbarism. Ultimately it may simply be a fear that the German capacity for evil is different, and that any thought of introducing a system like the Dutch one should be pre-emptively halted.

5. Tolerance

The history of the image of Dutch tolerance

How a country is viewed by the media of another country goes beyond specific subjects in which it differs. It is also on display in the treatment of stereotypical characteristics that are, justly or unjustly, connected with it. In the case of the Netherlands, a term often named is *tolerance*. For example the German historian Ernest Zahn, goes so far as to claim that the Dutch national consciousness has been shaped by it; the acceptance of mutual differences being crucial during the Eighty Years' War since internal strife would have almost guaranteed a defeat in the difficult struggle against overwhelming Spanish power.¹²⁹ He also favourably compares Dutch tolerance with the tolerance of Prussia. The idea being that Dutch tolerance grew out of the necessity of working with others in order to build dykes and other defences against water, making a live and let live approach necessary in order to survive and prosper. In Prussia the tolerance was decreed by the state from on high, and therefore didn't become part of the daily lives of the population. Regardless of how true these statements are, the label of tolerance has been applied to the Dutch for a long time, including in Germany. Mostly it has been viewed as a virtue. In 1725 the young Swiss polymath Albrecht von Haller proclaimed his surprise about the religious tolerance in the Dutch republic:

In short, when people here come together to pay for a teacher, it is considered a legitimate church. This general freedom has led to neither strife nor rebellion since the formation of the state.¹³⁰

Though the last line does not quite conform with reality, it shows not just the image of the Netherlands that was common, but also how different it was compared to other regions. On the other hand, one should not assume that the word tolerance was automatically considered a positive. Often the word was used in the sense that 'everything is allowed', and that no reprisals occurred no matter how depraved an action. At other times the definition of the word was not entirely followed. After all, tolerance does not entail *approving* of other ideas, behaviour or people, only that they are left alone. In modern settings tolerance is often conflated with the Dutch word '*gedogen*', allowing actions which are technically illegal. This approach is often described as a pragmatic solution, but also as a capitulation to the principles of law and justice. One German journalist described it as 'Tolerating the intolerant': misbehaving youth, addicted criminals and 'morally dubious practices' being allowed, no matter how much this disturbs the lives of normal citizens.¹³¹

Regardless of the positive or negative association, Tolerance is a keyword that is consistently used in German descriptions of Dutch society throughout the ages. As was discussed earlier, this is not self-evident; views of groups can and do change significantly over time. Even the German image of the Netherlands in other areas has changed significantly. In the 17th and early 18th century Dutch culture was admired in German areas. They were viewed as cultured, with a broad knowledge of books and languages as compared with more eastern regions.¹³² By the end of the 18th century, with the rise of Romanticism and the decline of the Dutch Republic, this had completely reversed into scornful contempt. Johan Gottfried Herder described the Dutch as 'a decadent nation of traders without poetry, with a culture that has remained stuck in humanism'.¹³³ He still, however, positively remarked on the civil freedoms in the Low Countries. Where other labels

¹²⁹ Ernest Zahn, *Das Unbekannte Holland: Regenten, Rebellen Und Reformatoren* (Berlin: Siedler, 1984), 33.

¹³⁰ 'Mit einem Worte, wann Leute sich zusammen thun und einen Lehrer bezahlen, so wird hier eine rechtmäßige Kirche daraus. Bey dieser allgemeinen Freyheit ist seit der Einrichtung desz Staates desztwegen weder Streit noch Aufruhr jemals entstanden' Bartstra, 'Onze voorouders door vreemden beoordeeld', 73.

¹³¹ Erich Wiedemann, 'Holland: Frau Antje in den Wechseljahren', *Der Spiegel*, 28 February 1994, 172.

¹³² Ginkel, *Notities over Nederlanders*, 15.

¹³³ *Ibid.*, 19.

disappeared, due to changes in real life, or because of movements in public opinion or culture, the label of tolerance has remained.

This is of course relative and depends on context. As the contrast between the country of a foreign commentator and the Netherlands increased, or the more difficult it was to find a reason for that difference, the more likely it was that the word was used as an explanation. In the nineteenth and early twentieth century, when the Netherlands was (mostly correctly) viewed as underdeveloped, the term 'tolerance' was used far less. The late 1960s and 1970s saw the rise of the image of the 'free' Netherlands where more was possible than in surrounding countries, as a result the term was used far more often. Even though the reality did not always conform to this image, the Netherlands gained a reputation as a country that was far more able to deal with social questions¹³⁴ and minorities in society, including migrants, than others.

Despite the occasional article or event that refuted or tried to refute this image, it mostly stayed intact for the rest of the century. The rise of the populist leader Pim Fortuyn, his murder, the changes in politics and public opinion and the rise of the even more controversial and outspoken populist Geert Wilders finally changed this set image in the German press (and that of other countries). Ironically, the conclusion that 'The Netherlands have changed' lead to a strong interest in examining the role of the Netherlands as an example for others – good or bad.

German media and Dutch tolerance

The news coverage in *Der Spiegel* shows a different example of this shift in opinion. In earlier years the paper accepted the picture of a tolerant Netherlands, while still being fairly nuanced about it. In one 1971 article it remarked that 'The tolerance of the Dutch is more benevolent disinterest. [...] They tolerate new people, without wishing to integrate them.'¹³⁵ As can be expected of a newspaper, it does try to tear down such stereotypes. For example, an 1977 article, on the racist reactions after Moluccan immigrants had hijacked a train, opened by calling the Netherlands 'proverbially tolerant' and recapping the history of that tolerance. However, it also investigated how true this idea still is, showing the somewhat troubling reaction to recent immigrants. Ultimately, by remarking on the ease with which the first post-war wave of Indonesians were welcomed, the article does not disprove the image of tolerance, even when the article receives the sub header 'The end of tolerance in Holland'.¹³⁶ Other limits are shown as well. A 1987 article quotes the German president saying that in the Netherlands the 'The nonconformist [...] is respected, even if he represents radical beliefs', but also quotes a Dutch woman that 'our tolerance ends with the Germans'.¹³⁷ Overall however, each new article about the subject restarts at the stereotype.

In the last years of the second millennium, the magazine claimed tolerance to be a quite constant characteristic of Dutch society, while sometimes claiming it is such a specific Dutch trait that copying Dutch examples may not always be possible. In an editorial from 1995, the Dutch drug policy was presented as an alternative for the increasingly unpopular policy of *Nulltoleranz* in Germany.¹³⁸ In the same year, an article about the Dutch handling of euthanasia mostly praised the results, but claimed that it would be hard to copy in Germany. The Dutch policy was 'rooted [...] in a highly developed tendency towards tolerance and

¹³⁴ Hans Righart, *De eindeloze jaren 60: geschiedenis van een generatieconflict* (Amsterdam, 1997), 45.

¹³⁵ 'Die Toleranz der Holländer jedoch ist eher wohlwollendes Desinteresse. Eingebettet in ihre Säulen, dulden sie neue neben sich, ohne sie integrieren zu wollen.' '„Verzuiling“ Einer ganzen Nation', *Der Spiegel*, 3 May 1971, 100.

¹³⁶ 'Holland: Mohrenköpfe und Lakritzen', *Der Spiegel*, 20 June 1977, 112.

¹³⁷ Sylvia Schreibe and Erich Wiedemann, 'Niederlande: „Pim war der Allerbeste“', *Der Spiegel*, 13 May 2002, 104.

¹³⁸ '„Alles, was knallt“', 50.

pragmatic ingenuity - to a level that can't be found everywhere.'¹³⁹ This idea of the Dutch being simply different is seen in other articles. The author of a 1998 article on the public and political reaction to random violence noted the agitation of some Dutch against what they see as tolerance gone too far, but still reverted to the Dutch *otherness* when dealing with problems. While they summarised the situation as 'The end of tolerance', the actual article emphasised the attempts to convince the young perpetrators of their folly with compassion as opposed to stronger punishments.¹⁴⁰ Though the article referenced the feelings of increased criminality in society (which is not borne out by statistics), the overall picture described was one where this is just one small problem of a larger group.

This reaction makes it understandable that when the signs of increasing discontent among the Dutch population arrived, they received little attention in the German media. The strong rise of the protest party *Leefbaar Nederland* (Liveable Netherlands), first in survey for the Dutch parliament, then in a resounding victory in Rotterdam during the local election of March 2002, were not mentioned at all. The first time Pim Fortuyn is mentioned was in a short piece regarding the sales success of his political manifest 'De puinhopen van acht jaar Paars' ('the wreckage of eight years of purple', a reference to the mixed colours of the governing coalition).¹⁴¹ A week later, the rise of Fortuyn was used as a peg on which the rise of rightwing populist and/or rightwing extremist movements throughout Europe could be hung. A reference was made to how easily Fortuyn was able to call up extreme emotions in the liberal *Stammland*¹⁴² (homeland or originating country). That term shows how much this seemed atypical of the Netherlands for the author. *Die Zeit* also placed the rise of Fortuyn in a wider European move to the right.¹⁴³ Beyond that, it also described him as someone who used the advantages of the Dutch tolerance while fighting them at the same time. 'As a well known gay man, Fortuyn profits from the famous tolerance of this society - and curses it as being lax in the same breath.'¹⁴⁴

After the murder of Fortuyn on May 6, the reporting in *Der Spiegel* shifted. The week after the murder saw a harsh article which hit a distressed tone concerning the situation in the Netherlands. The policy of *gedogen* is painted as a good concept that through the years had grown to become completely unworkable with 'ruthless prosecution of wrongfully parked cars' while 'hard crimes are tolerated until absurdity.' Claims were made that politicians and civil servants who make mistakes are generally immune to prosecution. The conclusion is clear: The Netherlands were not as good as was thought and have been changed for ever.

'The Dutch suffer not just from a degradation of morals. They also suffer from losing their Calvinistic function as role model for other countries. They wanted to be a model country where everybody can find salvation in their own way. But they only were able to build an ordinary community, which guarantees its members secure conditions, but also created a series of ugly deficits, amongst them a legal system that that does not provide reliable legal protections, and a political system which only manages bureaucracy. And now the low point of moral decline: the first political murder in 400 years. The shock is immense. And this much seems certain: the country in which tolerance was at home will no longer be the same.'¹⁴⁵

¹³⁹ 'Es fuße [...] auf dem hochentwickeltesten Sinn seiner Landsleute für Toleranz und praktische Vernunft - soviel Augenmaß sei nicht überall anzutreffen.'

'Euthanasie: Flucht in den Tod', *Der Spiegel*, 3 April 1995, 239.

¹⁴⁰ 'Niederlande: Knüppel neben der Tür', *Der Spiegel*, 4 May 1998, 176.

¹⁴¹ 'Pim Fortuyn', *Der Spiegel*, 25 March 2002, 240.

¹⁴² Manfred Ertel et al., 'Europa: „Wind nach rechts“', *Der Spiegel*, 30 March 2002, 123.

¹⁴³ Werner A. Perger, 'Adieu, Neue Mitte', *Die Zeit*, 25 April 2002, sec. Politik.

¹⁴⁴ 'Fortuyn profitiert als bekennender Homosexueller von der berühmten Toleranz dieser Gesellschaft - und beschimpft sie im selben Atemzug als lax.'

Joachim Fritz-Vannahme, 'Pim, Der Schmuddeltyp', *Die Zeit*, 11 April 2002, sec. Politik.

¹⁴⁵ 'Die Niederländer leiden nicht nur unter der Verflüchtigung der Sitten. Sie leiden auch darunter, dass sie ihre calvinistische Vorbildfunktion fürs Ausland verloren haben. Sie wollten ein Musterland, in dem jeder nach

In the same issue of *Der Spiegel* an article was laudatory about the much more strict Dutch rules on language acquisition for immigrants compared to Germany. The Dutch being less tolerant than thought was still viewed as an example to take for Germany

The electoral victory of Fortuyn's party, the LPF, was once again represented as an example of the state of politics in Europe,¹⁴⁶ but also as a clear backlash against the *Konsensgemauschel* (consensus wheeling and dealing) and lack of pragmatism in the major parties:

'The elections in France and The Netherlands have shown where the silence of reason, the noisy speechlessness of the *Zeitgeist* could lead. [...] Whether old or new centre [...] pragmatism must offensively establish its intellectual requirements time after time.'¹⁴⁷

In other words: tolerance is only useful when an eye is kept on the final result, and in this the Dutch had failed according to the writer.

In an edition with much attention for the Netherlands, *Die Zeit* viewed the rise and death of Fortuyn less as a collapse of the Dutch moral position and more as a signal. He was seen as breaking through the hierarchical consensus of the political elite and thereby reaching a generation of voters that was hardly interested in politics at all. According to the article, he did not just have an enormous influence on Dutch society in this way, but could also serve as a warning for all comparable democracies in Europe.¹⁴⁸ The uncoordinated reactions to the rising populism in Europe worried the newspaper, however. It is noted that apart from the reaction to the FPÖ taking part in the Austrian government, almost no counter force had been employed against the new populist forces. The success of the LPF in the Netherlands was therefore seen as an indication that European democracies were moving further in a populist direction. Or as one journalist wrote: 'it would be better for the democratic future of the Netherlands and the whole of Europe if Fortuyn was still alive and his ideas were dead instead of vice versa.'¹⁴⁹ The *Zeit* declared less the end of tolerance, and more the end of consensus.¹⁵⁰

A bigger change in the view of the Dutch came after the murder of filmmaker Theo van Gogh on 2 November 2004. Where the focus after Fortuyn was more on the discontent amongst parts of the Dutch population, this event led the German publications to declare the death of multicultural society in general and that of the myth of the utopian successful Dutch integration specifically. The Netherlands, they declared, did not do any better than Germany in this area, though tolerance was still the Dutch exception.

seiner Fassung selig werden kann. Aber sie haben es nur zu einem gewöhnlichen Gemeinwesen gebracht, das seinen Mitgliedern gesicherte Verhältnisse garantiert, das aber auch eine Reihe von hässlichen Defiziten hervorgebracht hat, unter anderem ein Rechtssystem, das keinen zuverlässigen Rechtsschutz mehr bietet, und ein politisches System, in dem nur noch bürokratisch verwaltet wird. Und nun der Tiefpunkt des moralischen Abstiegs: der erste politische Mord seit 400 Jahren. Der Schock ist gewaltig. Und so viel scheint sicher: Das Land, in dem die Toleranz zu Hause war, wird nicht mehr das gleiche Land sein wie vorher' Schreibe and Wiedemann, 'Niederlande: „Pim war der Allerbeste“', 134.

¹⁴⁶ Rüdiger Falksohn and Sylvia Schreiber, 'Niederlande: Weit weg von den Menschen', *Der Spiegel*, 18 May 2002, 137.

¹⁴⁷ 'Die Wahlen in Frankreich und den Niederlanden haben gezeigt, wohin das Schweigen der Vernunft, die lärmende Sprachlosigkeit des *Zeitgeists* führen können. [...] Ob neue oder alte Mitte [...] der Pragmatismus muss seine intellektuellen Voraussetzungen immer wieder offensiv begründen.'

Reinhard Mohr, 'Zeitgeist: War da was?', *Der Spiegel*, 27 May 2002, 193.

¹⁴⁸ Werner A. Perger, 'Pimmania', *Die Zeit*, 16 May 2002, sec. Politik.

¹⁴⁹ Werner A. Perger, 'Niederlande: Der Rechtsruck Und Wir', *Die Zeit*, 22 December 2013, sec. Politik.

¹⁵⁰ Richard Herzinger, 'Niederlande: Die Verordner Der Freiheit', *Die Zeit*, 16 May 2002, sec. Politik.

'Holland is still a haven of tolerance. But the colourful multi-ethnic folklore in Amsterdam's Canal District fakes a multi-cultural harmony, which does not exist.'¹⁵¹

But the emphasis on the greater freedom in the Netherlands remained. Not just in comparisons with Germany, but with the whole of Europe:

'[Van Gogh's] rants against people of other faiths and other beliefs would have brought him into conflict with the law in most other European countries.'¹⁵²

As the focal point of the reporting changed from general political discontent to the integration of immigrants from different cultures, it also moved the role of the Netherlands. Where before the rise of populism in the Netherlands was used as an example of what happened across Europe, after the murder of van Gogh its role is more that of the German canary in the coal mine; the Netherlands as predictor of future events in Germany.

'All of a sudden [the Netherlands] stood before the ruins of his hitherto acclaimed tolerance. First mosques and Koran schools burned, then incendiary flew against churches. The culture clash in the neighbouring country also drew Germany to look at conditions that had hitherto been glossed over by many with the slogan "Cultural diversity".'¹⁵³

With the attacks on the London tube in 2005, reporting moved further towards the specific religious integration problem. *Der Spiegel* publishes an editorial by the Dutch writer Leon de Winter that placed the situation firmly into the *clash of civilizations* concept.¹⁵⁴ It is notable that they explicitly chose a Dutch writer to write about the situation, even though his fame in Germany was limited at the time. This practice happened several times more, including in other newspapers than *Spiegel* and *Zeit*, creating an odd little subgenre. Perhaps it was thought that the usual correspondents had missed something.

The rise of Geert Wilders and the victory of his party in the election for the Dutch parliament drew scant attention in the German media, especially compared to articles about Ayaan Hirsi Ali, an immigrant from Somalia who became a fervent opponent of Islam and a Dutch member of parliament for the right-wing VVD. First she drew attention as a co-writer of *Submission*, the movie that was given as one the main reasons for the murder of Theo van Gogh, later for the uncompromising position she took both against her critics as well as towards the threats on her life she received. A separate article was dedicated to her and her idea that 'tolerance against intolerants is nothing but cowardice.'¹⁵⁵

Despite the early lack of interest, some attention was paid to the role of Wilders as his party grew. Unlike Fortuyn, who was seen as groundbreaking, he was viewed as more of a typical

¹⁵¹ 'Holland ist immer noch ein Hort von Toleranz. Doch die bunte Vielvölkerfolklore im Amsterdamer Grachtenviertel täuscht eine Multikulti-Harmonie vor, die es nicht gibt.'

Reinhard Mohr, 'Niederlande: Krach schlagen für die Freiheit', *Der Spiegel*, 8 November 2004, 127.

¹⁵² '[van Goghs] Tiraden gegen Andersgläubige und Andersdenkende hätten ihn in den meisten anderen Ländern Europas unweigerlich in Konflikt mit dem Strafrecht gebracht.'

Dieter Bednarz et al., 'Tage des Zorns', *Der Spiegel*, 6 February 2006, 102.

¹⁵³ 'Mit einem Mal stand [Holland] vor den Trümmern seiner bis dahin viel gelobten Toleranz. Erst brannten Moscheen und Koranschulen, dann flogen Brandsätze gegen Kirchen. Der Kultur-Clash im Nachbarland lenkte auch in der Bundesrepublik den Blick auf Verhältnisse, die viele bis dahin gern mit dem Schlagwort "kulturelle Vielfalt" schöngeredet hatten.'

Matthias Bartsch et al., 'Haben wir schon die Scharia?', *Der Spiegel*, 26 March 2007, 22.

¹⁵⁴ Leon de Winter, 'Debatte: Mörderische Frömmigkeit', *Der Spiegel*, 18 July 2005, 108.

¹⁵⁵ 'Toleranz gegenüber Intoleranten nichts anderes als Feigheit ist'

Gerald Traufetter, 'Islam: „Toleranz ist Feigheit“', 3 December 2007, 170.

example of right wing populism, but he was still represented as a danger, because 'his intolerance spreads like an oil film across society.'¹⁵⁶

At the same time, there was once again more attention for the nuances of Dutch policies. In an article about the contradictions between a strictly enforced smoking prohibition which led to the situation that smoking weed in coffee shops is only allowed if there is no tobacco in it:

[Here] *the principle of the caring Netherlands meets the principle of Dutch tolerance. It is two different concepts of authority that contradict each other.*¹⁵⁷

In a 2010 editorial, the half-Dutch journalist Ian Buruma posited that there were now two, both strongly exaggerated, images of the Netherlands. On the one hand a wild and unbound Sodom and Gomorra, where everything is possible from drugs to euthanasia and where even violent extremists are supported by the state. On the other a home for reactionaries.¹⁵⁸ But even he placed Dutch society in a special place, explaining the irony of Wilders wanting to place restrictions on immigrants in the name of protecting the achievements of society such as freedom of speech, tolerance and the acceptance of homosexuality with the remark that 'Modern Dutch populism has just always been a bit different.' He also saw another facet: the rising hysteria as a counterpart to the enormous changes that occurred in the 1960s, when after more than a century of closed-off Calvinism society decided to let go. According to the article populist groups embodied those two sides simultaneously: the conservative reactionism in combination with the exuberance after the end of the suppressive period. The example for the German reader is clear: the same combination was present in Germany as well and once again the Dutch example could be prophetic.

In the end, however, all this discussion did not necessarily lead to the letting go of old stereotypes. This was quite understandable in the case of the, for outsiders, contradictory figure of Pim Fortuyn. An anti-migrant populist who was also a university lecturer in Marxism, an elitist gay man who found great resonance and even idolisation in the working class, all fits very well in the storyline of a country that is able to bring contradictory groups together. After the funeral of Fortuyn, the *Frankfurter Rundfunk*¹⁵⁹ described the unusual coalition of '[y]ouths and pensioners, unemployed and double-income earners, natives and immigrants, conservatives and progressives' who signed the book of condolence as a 'very typical Dutch reaction'.¹⁶⁰ Still, when the populism, strife and more extreme tone in public discourse did not abate, the *Süddeutsche Zeitung* had to admit a few years later that the fairytale land that was so admired by its neighbours for its patient politics, consensus society and consultation culture, does not exist.¹⁶¹

Tolerance overview

A few things are noticeable looking at the reporting by *Der Spiegel* and *Die Zeit* during this period. For a start, Dutch tolerance is a surprisingly persistent concept, not only in regards to how long it has been used, but also when looking at German publications over the last few decades. Secondly, the image of the Netherlands as a supremely tolerant nation did undergo a re-evaluation as the Dutch troubles increased. While the declaration that 'Dutch tolerance has died' had come up in earlier reports, a closer reading of such articles makes it seem to be more about reducing the absolutist implication of the term, rather than a real conviction

¹⁵⁶ 'Weil sich seine Intoleranz wie ein Ölfilm in der Mitte der Gesellschaft ausbreitet' Juliane von Mittelstaedt, 'Niederlande: Der Angsthändler', *Der Spiegel*, 9 November 2009, 109.

¹⁵⁷ '[Da] trifft das Prinzip der fürsorglichen Niederlande auf das Prinzip der niederländischen Toleranz. Es sind zwei verschiedene Konzepte von Obrigkeit, die da einander widersprechen.'

Ansbert Kneip, 'Ausland: Volle Tüte', *Der Spiegel*, 7 July 2008, 114.

¹⁵⁸ Ian Buruma, 'Essay: Rückkehr der Bourgeoisie', *Der Spiegel*, 7 June 2010, 90.

¹⁵⁹ Found in the thematic news clippings archive of the Duitsland Instituut in Amsterdam.

¹⁶⁰ Bert van den Brink, 'Das Erbe des Pim Fortuyn', *Frankfurter Rundschau*, 11 May 2002.

¹⁶¹ Siggie Weidemann, 'Die Niederlande sind ein Missverständnis', *Süddeutschen Zeitung*, 5 July 2004.

that something has changed. After the murders of Fortuyn and Van Gogh, and the electoral success of anti-immigration parties, this changed. It was suggested that Dutch tolerance either never existed or that it was far less powerful than thought. The persistence of the idea continued, however. The main change may be a conclusion in the newspapers that while tolerance is present in the Netherlands, it is less a general characteristic and more something related to specific societal and cultural areas.

Taking a step back and looking at what the reporting says about the Dutch image in Germany, a special status given to the Netherlands in most cases can be seen. In nearly every situation where the Dutch differ from Germany there are references that this 'is only possible in the Netherlands'. Putting aside the question of how true such statements are, they show the role appointed to the Netherlands in the mental framework which may partly explain the persistence of the label of tolerance. This role was given specifically to the Dutch as opposed to other countries. Its function seems to be that of greater freedom, for better and for worse: the freer Dutch id as opposed to the perceived controlled German superego. The pioneering role given to the Netherlands in reporting could be understood in this context. Of course, any country going through changes that are likely to occur in Germany would receive additional interest, but in German reporting the Netherlands seem to be placed in this role far more often than average, even when other (neighbouring) countries could theoretically fulfil the same role.

6. Discussion

Evaluating the discourse concerning a nation by way of a relatively objectively written news report is difficult. Most of the text naturally concerns simple facts and explanation since the attention of the average reader will be fleeting. This goes double when the event happened abroad, since the reader will have less knowledge on the subject or interest in details. Still, as neighbouring countries Germany and the Netherlands have often gone through similar circumstances in similar times, with different legal and societal responses, leading to referencing and discussion in the media. This study has looked at some key subjects that have caused policymakers and public alike to searching for the best answer in difficult terrain ethically and policy-wise. The hope was that this would lead to an indication of what image the Netherlands takes up in the German mental space, or at least in that of German reporting.

Results from the studied events

The research on drug policy was somewhat surprising. Despite the early 1970s Dutch policy of not going after drug users in general and soft drug users specifically, and the fact that in the late 1960s Amsterdam was already seen as a drug Walhalla, little attention was paid in the German newspapers to the Netherlands. From reports in both *Der Spiegel* and *Die Zeit* it would seem that public discussion was far more interested in the rising tide of heroin trade and related crime. For quite some time this did lead to some grumbling on the easy accessibility of drugs in the Netherlands by German commentators. Even in reports that warned of the possibility that such a policy could draw more people not just to Amsterdam and the rest of the Netherlands, but towards drugs in general was tempered by remarks about the positive side: by separating the drugs, the gateway effect had been all but eliminated. Though both newspapers remained somewhat sceptical, a change came when the news moved from the quick rise of heroin addiction in the 1970s to the problem of how to deal with the addicts themselves in the 1980s. Here the *Zeit* and *Spiegel* both made it clear they felt the German policy didn't work, and what was worse: it treated the people involved badly. Both papers cite the more humane and successful treatments, even while acknowledging that they didn't solve the problem. The picture that was painted is of a German state that refuses to be pragmatic in contrast to the Dutch one, which at least attempts to lessen the suffering.

The reporting on abortion also showed some interesting points. When first the United Kingdom and then the Netherlands made access to abortions more easily and legally available by way of dedicated clinics, it was a clear break with the status quo up to that point, not only in these two countries but also in West-Germany. Despite this, and the already ongoing debate in German society and politics on whether and how to change the law, little reporting could be found on the subject in the first few years after the clinics were founded. Based on both the later increase in frequency in reporting and the more positive tone where the policy of the Netherlands was concerned, one conclusion could be that the earlier lack of attention was the result of developments in Germany itself. Perhaps because it seemed clear to spectators that the German law would be changed comprehensively to allow more freedom for women to choose, the experiences in other countries may have seemed less useful. This was particularly the case when, as in the Dutch example, the legal structure may have seemed convoluted. After the new law had failed in courts, the system was changed only marginally, which meant the ability of women to have an abortion became largely dependent on where they lived. In this situation, with large numbers of women going to the Netherlands because the procedure was too difficult or impossible to attain at home, it makes sense both newspapers would focus more attention on the Dutch experience and compare this unfavourably with Germany. A second notable fact is that the ethical discussion in Germany seems to have mostly ignored the crimes of the National-Socialists. Contrary to expectation this played little to no role in the arguments. Reading between the lines, both

papers were in favour of a far more liberal system. When they did report on the Dutch clinics, one core value that they reported several times was how the women were treated.

The Dutch approach to euthanasia is perhaps the most controversial of the topics studied. Where the positive results of the Dutch drugs policy could count on some recognition, and in regard to abortion the emphasis of writers for the two newspapers seems to have been on the overly principled debate in Germany which they seemed to did not take the people involved into account enough, the situation in regard to the consciously ending of a human life by physicians is more not only complex but also far more fraught with fears. Unlike with abortion, the euthanasia debate was very much focused on the crimes of the Third Reich. For several decades after the war, both newspapers had regular reports of new horrific tales and of a string of court cases where rediscovered perpetrators were convicted for the murders they committed under the name of mercy killing. From this viewpoint it makes sense that any move towards legalizing euthanasia would be treated with the utmost suspicion, not just by the German public but also by the makers of the *Zeit* and *Spiegel*. The fact that the Dutch system of legalised euthanasia that slowly came into being superficially had many of the same qualities as the Nazi program cannot have helped. All the more remarkable are the very careful articles that try to view the Dutch development in an objective way. The results are views of the Dutch approach to euthanasia that acknowledge both the suffering of the patients and the generally good intention of the policymakers and doctors, while still clearly being very afraid of possible consequences. In how far these worries are thought to be universal or only applicable to the German condition is left open.

The final topic of research was tolerance, or more specific: what the impact would be of the rise of anti-immigrant leaders and parties and political murders on the German image of the Netherlands as an open and welcoming country. This part of the newspaper research delivered the most accessible articles on the core research question. The response to the election victories of populist parties, and the murder of both a political leader and a well known filmmaker was a significant number of articles considering whether or not the Netherlands were still a tolerant country, whether they ever had been and what it even meant to be tolerant. While articles which declared the end of Dutch tolerance had been written regularly before, never were they meant so definitively. Nevertheless, the core image of the Netherlands as a tolerant country endured even these attacks. Each new event considered narrow-minded by the author might cause them to declare that the Dutch tolerance was now over, but the next article might regurgitate that standard phrase once again with ease. What did change though was the use of the Netherlands as an example for Germany. Not that this stopped, in some ways it even increased. The difference was that now the Dutch were less a guide to follow and more a warning of what was yet to come.

Changes in the newspapers themselves

Looking at articles in both publications throughout the years, two changes are noticeable. One is that their reporting, perhaps mirroring an overall trend in journalism, has become more consciously subjective, or at least it seems more ready to explicitly add an opinion to news pieces. Directly after the war, and through most of the 1950s and 1960s, reports remained short with only the bare facts and little in the form of adjectives. While some reports could have a clear 'flavour', this was usually limited to news of less national importance.

As the years progressed, both papers added more and more explanations, subjective though usually balanced remarks or quotes, as well as humour. Some of this development says little about the larger goals of the writers and editors, either consciously or unconsciously. While *Die Zeit* tended to stick more closely to the journalistic ideal of objective reporting, when looking at its publishing history on abortion, for example, it clearly had the agenda that the law should be changed. After all, just by keeping an issue in the news, papers can significantly influence society. In this sense the reduction in articles on Dutch drug policy and an almost complete stop of articles that compare set policies with Germany may show us that the Dutch approach had found a home in Germany itself, resulting in less need to fan the flames by the publications.

A small issue is the response to the changed situation after the murder of Pim Fortuyn and the rise of Geert Wilders in the rise of articles written by Dutch authors. Even more remarkable is that many of them are not journalists per se, but literary writers such as Cees Notenboom and Leon de Winter. It helped that, due to a small breakthrough since *the Frankfurter Buchmesse* in 1993, Dutch authors were at least somewhat known in Germany. Still, why would several newspapers let a country be explained by authors from the country itself when they had correspondents for precisely that purpose? Is it because they had no faith in the ability of the correspondents to read the mood after the big shifts? Or perhaps the editors of the papers felt that what was needed to explain the situation was not so much an objective view from an outsider, but the personal experience of a Dutch citizen.

Future research

When reviewing this research it should be noted that the amount of material is vast. Both the *Spiegel* and the *Zeit* have been in operation for around seventy years, resulting in over 3500 editions each, while every edition in turn contains more than a hundred articles. Despite the fact that the main focus is on German news, and the Netherlands are only one of many countries for which their readers might have an interest, the over 7000 total editions contain several thousand articles that at least mention the Netherlands. Focusing only on articles that are for a great extent, or even mainly about the Netherlands, still leaves several hundreds to be reviewed. For this research this has been narrowed down significantly by choosing four topics, and as a result the number of articles was paired down to several dozens. Since this vast set of source material has the added bonus of being completely accessible by digital means, and current technology allows for the storing and searching of huge amounts of text, this study has clearly only scratched the surface of what is possible. Several options for further research exist. In a larger study, the combination of digital material with a thorough academic analysis beyond specific subjects could deliver a fascinating view of how the image of the Netherlands has evolved in the German press. In an extension of that, one could look at how different countries are portrayed. Are the Netherlands a special case, or are many, maybe even all countries used as an example?

Another direction would be to contrast the writing on the Netherlands with that of other German publications with a different readership. Whether the newspapers are read by and/or aimed at people on different parts of the political or social spectrum could give an intriguing look at what parts, if any, of the image of other countries is universal across the German political and social spectrum. Finally, though the studied subjects were chosen in advance for hopefully maximum image based reporting, there are many other issues that could provide a fascinating insight by looking at how they were described throughout the years in these publications. It can only be hoped that digitisation and search technology in the future advance further, giving the opportunity for such research.

The image of the Netherlands in German media

Overall, the goal of finding a German image of the Netherlands proved at first to be somewhat difficult. The focus on mostly factual reporting by both newspapers meant that conclusions could mostly only be drawn by inference combined with judging the goal and balance of parts of the text. The possibility to quickly find how often certain subjects were raised in articles during a specific time period, and how this changed over time still gave much insight, and the articles found have given many an interesting quote. But beyond this, some fairly clear patterns could be distilled from the articles analysed. One general point is that in articles about abortion, treatment of drug addicts and even euthanasia an emphasis is laid on the idea that the Dutch approach in each case is more humane than the German one. Even in the case of euthanasia, where both newspapers seem reluctant in their judgement, there are references of cases where the Dutch ending of a life is contrasted with the continued suffering of a German patient and the former is explicitly remarked upon as a being better fate than that of the latter.

Another pattern seems to be the idea the Dutch are more focused on the practical result of policies: that they are more willing to form or change policy if it does not achieve the stated goal. Regardless of whether this is true, and whether this is viewed as the result of an inherent quality or of previous choices made in Dutch society, it partly explains why the Netherlands is quite often used as an example in German discussion.

This use of the Netherlands as an example is frequent, though usually not explicit. It can be seen in the way positive measures or results are often compared to the unsuccessful ones in Germany. Or, in the case of negative examples, how the undesirable outcome in the Netherlands is not used to show the good situation in Germany, but as a warning of what may or will happen there. The latter happened more and more in the 21st century, which could be interpreted as the Netherlands doing worse, but also as Germany doing better in the eyes of its own media.

What can be concluded about the role of the Dutch image in German media from all of these considerations? The small number of articles about the Netherlands that were researched portray a country that is significantly more pragmatic, somewhat more free and ever so slightly more exotic than Germany. The question of whether this is true is irrelevant, what matters is that this is how the Netherlands are portrayed, at least in *Der Spiegel* and *Die Zeit*. Also of importance is that none of those three characteristics is necessarily positive. Exotic may be interesting, it also means unknown. Free also mean that there are no boundaries, the results of which are well known to any German reader. The pragmatic approach means focusing on results, but can also mean muddling through without solving the core problem. Ultimately, any image of the other represents something that may be desired or feared, but always something that isn't part of the self and most likely never will be.

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