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ANALYTIC, COMPARATIVE, AND HISTORICIST DEFINITIONS OF "COLONY"

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Abstract. *In an era in which accusations of "colonialism" are increasingly thrown around in political debate, it becomes necessary to define exactly what is meant by "colony." As this article demonstrates, the heterogeneity and complexity of historical examples make it unexpectedly difficult to pin down exactly what this central term means and which historical territories should be described as "colonies." The article considers three approaches to defining this key term: analytical, comparative, and historicist. While each has strengths and weaknesses, a case is made for greater historicist research in the future, as this approach is far less developed than the others.*

Keywords: *colonialism, historical terminology, conceptual history, comparative history, historicism*

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Introduction

> Imperial name-calling—invocations of the word empire or colonialism to discredit interventions by American, French, or other governments—does not provide means to analyze or improve today's world. But an exploration of the histories of empires, both old and recent, can expand our understanding of how the world came to be what it is and open a wider perspective on the organization of political power in the past, present, and, perhaps, future. (Burbank and Cooper 2012)

We are living in an era with much history-based name-calling, which poses problems for historians who are attempting to understand the complex nuances of the past. I agree with Burbank and Cooper's assertion that simple name-calling accomplishes little, but I would not write off the possibility that a careful comparative analysis could uncover illuminating parallels between imperial history and current events. Rather than name-calling, this would consist of some sort of substantive assertion. But on what basis should such terms such as "imperialism" and "colony" be defined? Naturally, there is no single right answer, but different answers can be more or less helpful for understanding the past and the present.

It is often the terms that appear the most obvious that are the hardest to precisely define. After several decades of postcolonial studies and New Imperial History, professional historians and those working in related fields are very much aware of the role that colonialism played in shaping the modern world. And yet, when one looks beyond the best-known cases of the British and French Empires, it is actually not at all clear where to draw the line between what constituted or constitutes a "colony" and what does not. It seems logical that in order to decolonize something, it must first have been colonized, but one of the main questions that this special issue was called to address, whether the Soviet Union's satellite states should be understood as "colonies," is far from uncontested. As this paper will attempt to show, even many territories within the historical British and French Empires that are almost universally considered "colonies" today were not unambiguously so, depending on one's perspective. Historians, therefore, need to be careful when applying this term, both to established and new cases.

It seems to me that there are at least three approaches to establishing a definition of the term "colony": an *analytic approach* based on a theoretical definition, a *comparative approach* based on comparison with one or more exemplary cases, and a *historicist approach* based on how people described different territories at the time. None of these approaches is completely unproblematic, and, as we shall see, they often have a tendency to inadvertently bleed into one another. By considering each in turn, we can gain a greater awareness of exactly what we mean when we refer to a territory as a "colony."

1. The Analytic Approach

If we begin with an analytic approach, many political scientists and legal theorists have attempted to create a generic definition of "colony" that can then be used to evaluate individual cases. The Oxford English Dictionary has two relevant definitions of "colony": one short and one slightly longer. The short definition is "A human settlement or territory

controlled by a foreign power" (OED 2022). This definition in many ways gets to the heart or essence of what colonialism is about: foreign rule. The opposite of colonialism is thereby local or self-rule. This does not need to be a democratic rule, merely the rule of an "indigenous" government of some sort.

This can easily become normative: the implication for present-day readers is that local or indigenous governments are more legitimate than foreign ones. This likely reflects the influence of nineteenth century nationalism, which is in many ways ironic since the zenith of nationalism largely corresponded to the high-water mark of modern colonialism. Many empires were ruled by nation-states. This contradiction was of course frequently resolved at the time by racist or other chauvinist logic. As Dipesh Chakrabarty famously put it, colonialists consigned non-Western peoples to "the waiting room of history" (Chakrabarty 2000: 8), and they were generally not thought of as being subject to the same laws governing human progress as Westerners. Whether through theories of "Oriental despotism" or other forms of the idea that non-white races could not achieve the same level of social and political maturity as Europeans, colonized peoples were excluded *a priori* from being active subjects capable of modern national formation.

Nevertheless, the aforementioned contradiction suggests a fundamentally different basis of legitimacy for metropolitan and colonial government: metropolitan governments derived legitimacy in large part through their indigenous and nationalist credentials (think of the counterexamples of European popular discontentment with "foreign" monarchs that gained their throne through transnational ties), whereas colonial governments gained their legitimacy (at least in theory) through providing quality, "civilized" rule. This was not always the case; in British India, for example, the Aryan or Indo-European theory of the ancestral bond of South Asia and Europe allowed some colonialists to argue that the British Raj was merely a kind of "family reunion" (Trautmann 1997: 15–17). This was, however, largely an *ex post facto* legitimizing scheme and hardly the most important in the arsenal of British colonial rhetoric, nor were such ideas of common ancestry an important justification for imperial rule in the majority of places around the globe. Instead, the "civilizing mission" or, even more revealingly, the "white man's burden" of benevolent outsiders in the "uncivilized" world was the primary legitimizing force for modern colonialism, even if it frequently was *ex post facto*, serving to rationalize less high-minded expansionist activity.

Another frequently-cited reason that foreign rule is now considered significantly different from, and less legitimate than, local rule is that indigenous governments are more easily held accountable by the people they rule, at least in theory. Discontented miners and peasants from, say, the Swedish province of Dalarna can march on Stockholm to demand or impose change, whereas it is far more difficult for disaffected residents of Jakarta to march on the Hague. This has been used as an argument by some historians of colonialism for why colonial rule was either more brutal or more indifferent to the needs of those it ruled. Famously, the British in India did not feel obliged to provide the same level of famine relief as previous, in some ways equally undemocratic, local rulers (Bhambra 2025). Other scholarship has shown that the unwillingness of colonial regimes to adequately prepare for or mitigate ongoing famines was not limited to British India—

major famines in French Indochina displayed similar patterns and famines in Ireland have also been linked to colonial attitudes (Nguyen-Marshall 2005; Klid 2021). This has been used as a strong argument for the illegitimacy of colonial rule, even in comparison to indigenous autocratic systems. Gurminder Bhambra has recently argued that in light of the far more frequent, and far deadlier, famines under the period of British rule than during all previous Indian history, the Mughal Empire should not be considered an "empire" of the same type as the British Empire, as its "moral economy" was distinct from the modern European "colonial political economy." The latter was based on maximizing extraction in its colonies with little sense of responsibility to the people it governed (Bhambra 2025). Both the difficulty of effective mass protest at the seat of power and the lack of a common "moral economy" binding the rulers to the ruled can thus explain the emphasis on foreign rule in the OED's short definition of colonialism.

But what exactly constitutes "foreign"? Examples from all modern nation-states reveal that regional resentment towards the central government can be strong. Such local patriotism seems to be a nearly universal human phenomenon. In fact, historians have demonstrated that the processes of national centralization that were key to modernization in many countries bore a strong resemblance to colonialism, especially under assimilatory regimes. The classic "peasants into Frenchmen" example studied by Eugen Weber involved stamping out local dialects and customs in the name of national centralization in France (Weber 1976). Similar processes occurred in Japan and other countries. It is not always easy to draw a clear line between national and colonial assimilation. Provincials within the metropole were often looked down upon by the political center in the same terms as colonial subjects: as backwards, uneducated, uncivilized, and even biologically inferior. It was common for elites to compare provincials or even the urban poor with colonial or racial "others" (see, for example, Andersson Burnett 2012: 271). Scholars like Bhambra argue that the difference between national and colonial assimilatory processes has to do with political representation or lack thereof (Bhambra 2025: 20), but as the franchise was severely curtailed even in most colonial metropoles for long periods, even this obvious and crucial distinction cannot completely be used to precisely define "colonial" rule.

Many times, the processes of colonialism and national centralization happened in parallel, as in the case of the Japanese Empire. While it was earlier common to think of the Meiji government as first uniting and modernizing Japan and then colonizing its neighbors, historians have recently demonstrated that both processes in fact were undertaken in tandem (Atkins 2010; Mason 2012). Bhambra has made a similar case for European colonial powers:

> The exemplar nation states of modernity—Britain, France, and the Netherlands—were established simultaneously with the development of their overseas empires. These nation states did not emerge in the process of replacing existing empires, but rather through the creation of new overseas colonial empires. (Bhambra 2025: 2)

This has changed historians' understanding of these processes in important ways. Owing to a more restrictive definition of "colony," however, earlier scholarship of at least

the Japanese Empire tended to date the beginning of Japanese colonialism to 1895 with the acquisition of Taiwan, often described as "Japan's first colony," neglecting earlier colonial processes in Hokkaido and the Ryukyu Islands (the latter of which earlier formed a separate kingdom and of which Okinawa is the largest and best known). Especially in the case of the Ryukyu Islands, which have a proximate language and culture, the question of the "foreignness" of Japanese rule is sometimes implicitly called into question, demonstrating how it often can be difficult to draw such lines even with relatively clear analytic definitions.

The OED's long definition of "colony" is "A country or area under the full or partial political control of another country and occupied by settlers from that country" (OED 2022). The emphasis on settlers clashes with the distinction between settlement and resource-extraction colonies that has long been discussed by historians. With several major exceptions, like Australia, Algeria, and Manchuria, imperial historians generally argue that settlement colonies were the main form of *early modern* colonization, whereas the New Imperialism beginning in last quarter of the nineteenth century primarily conquered territories with the aim of extracting resources, with little or no settlement from the imperial center (see, for example, Veracini 2014). Quinine made it possible for more Europeans to live in previously uncolonized tropical regions by the late nineteenth century, but most of them still considered the tropics a dangerous, uncomfortable, and undesirable site of mass settlement. Moreover, Africans and Asians were often less catastrophically susceptible to European disease than the Indigenous populations of the Americas and other earlier settler colonies. Due to its Ancient Roman origins, the term "colony" has, at least initially, implied settlement rather than mere resource extraction. However, the addition of predominantly resource-extraction colonies to preexisting European colonial empires (as well as the universal penchant for celebrating the vastness of one's empire by presenting maps or lists that group together all its different territories), quickly led to multiple types of overseas territories being called "colonies," causing much of the conceptual confusion that this article aims to explore.

The OED definitions are a useful starting point, but other analytic definitions or criteria have also been applied to determine the "coloniality" of a particular territory. One such criterion is the so-called "blue water" or "salt water" test, whereby only territories situated across an ocean are counted as "colonies" (see Anaya 2004: 54). This rules out continental empires like the Russian or Ottoman Empires (or for that matter, the Soviet Union), and could even be used to disqualify adjacent territories, like Ireland, or entire empires, such as the Japanese Empire. It also complicates the study of a number of (predominantly British) settler colonies that later ruled over overseas territories. A prime example is the United States, whose territorial expansion gradually evolved from early modern settler colonialism to a modern version of "continental imperialism" (see Karuka 2019) to a form of overseas empire more consistent with the most common late-nineteenth-century European varieties, when it took over the Philippines. Nevertheless, this long-term, heterogeneous, and ever-changing American expansionism was classified by contemporaries under the single idea of Westward "manifest destiny," which, many of them contended, could easily continue beyond the West Coast (San Buenaventura 1998).

Other complex and potentially confusing examples include Australia's and South Africa's colonial rule over adjacent lands.

According to a number of legal scholars, the idea of the "salt water test" was institutionalized through a supplemental resolution clarifying the applicability of the 1960 UN General Assembly Declaration 1514, "Declaration on the Granting of Independence to Colonial Countries and Peoples" (UN 1960a). This declaration denounced colonialism as "prevent[ing] the development of international economic co-operation, imped[ing] the social, cultural and economic development of dependent peoples and militat[ing] against the United Nations ideal of universal peace," and called for granting self-determination to all colonies, but did not clearly define what counted as a "colony" (UN 1960a). Hence the supplemental resolution, № 1541, which was passed the following day. This did not use the term "salt water," but defined what it called a "non-self-governing territory" (understood from the context as referring to a "colony") as being "geographically separate and … distinct ethnically and/or culturally from the country administering it" (UN 1960b). In short, a colony is characterized by "ethnically and/or culturally" foreign rule and not being a contiguous part of the ruling country. Furthermore, based on these UN guidelines, other considerations, whether "administrative, political, juridical, economic or historical" may only be taken into account "Once it has been established that such a prima facie case of geographical and ethnical or cultural distinctness of a territory exists" (UN 1960b). To avoid any ambiguity, the following declaration, № 1542, criticized Portugal for not following its UN obligations and specifically named nine "non-self-administering" territories for decolonization (UN 1960c). These UN resolutions were unquestionably an important milestone for the decolonization movement, but the so-called "salt water test" has been criticized by some legal scholars for hindering some peoples' self-determination through its overreliance on geographical criteria (see, for example, Woocher 2000; Hanauer 1995).

Naturally, historians are not obligated to, and perhaps should not, derive their analytic categories from UN law, especially when it was formulated for a different purpose and in a different context than what they are studying. Implicitly or explicitly, some form of the salt water test has nevertheless guided most historians' understanding of what constitutes a "colony" until quite recently. In the last two decades, historians have increasingly questioned the distinction between "overseas" and "continental" empires, arguing that the salt water test perhaps too conveniently disqualifies territories that can usefully be studied from a colonial or postcolonial perspective. For example, Manu Karuka has argued for the importance of recognizing the "continental imperialism" of the United States in consideration of the need for justice for dispossessed Native Americans. In his view, "To conceive of the United States in national terms is to naturalize colonialism" (Karuka 2019: xii). It could be that the salt water test is related to the aforementioned ideas of the illegitimacy of distant, foreign rule, but it often seems like a clumsy attempt to rule out examples simply because they are not enough like the British Empire, a logic from the comparative approach that is motivated more by canonical bias than analytic rigor or usefulness.

Another rule, often used in international legal situations, uses decolonization itself as the defining marker of coloniality. If a territory has not been decolonized, this argument goes, then it does not count as a colony. But this is clearly problematic, as there are many territories still belonging to imperial metropoles that once had the same status as others that *were* decolonized. Indeed, returning to the UN resolutions of 1960, self-determination could be achieved not only through national independence but also through "Integration with an independent State," so long as this resulted in immediate "equal status and rights of citizenship and equal guarantees of fundamental rights and freedoms without any distinction or discrimination; both [peoples] should have equal rights and opportunities for representation and effective participation at all levels in the executive, legislative and judicial organs of government" (UN 1960b). It could be argued that this was the case for colonies like Hawai'i and Hokkaido, which have currently been (almost) entirely amalgamated with the colonial metropole (for legal vestiges of their former colonial status, see Arvin 2019, chap. 4; Mason 2012).

In an important monograph, *Vichy in the Tropics*, Eric Jennings has demonstrated how national independence or integration with the metropole were two sides of the same coin in the French Empire. He argues that the Vichy government's turn to a more hardline, segregationist colonial rule after several decades of more liberal governance led to a common desire in France's various colonies for legal guarantees of equal rights, but that this took different forms in different territories. Some colonies were pushed to seek independence while others sought closer ties to France, becoming overseas *départements* with the same legal status and democratic representation as metropolitan administrative units (Jennings 2001). To claim that the colonies that took this latter route, like Martinique, were *never* colonies is clearly disingenuous.

Better analytic definitions can, of course, be established, but as these examples show, the sheer multiplicity and complexity of historical cases always put these to the test. Defining whether a territory was sufficiently ethnically or culturally "foreign" or geographically distant will always be, in some ways, an arbitrary exercise. At a more abstract philosophical level, analytic definitions will always be based at some level on real-world examples. Often implicitly, or perhaps even unconsciously, analytic definitions are based on certain paradigmatic examples, like the British Empire. Common sense based on real-world conditions also typically guides the application of analytic definitions. For example, I have been skeptical of research that describes the claiming of uninhabited islands like the Bonin or Midway Islands as "colonialism," since for me, "colonialism" is only analytically useful for historians if it describes the occupation of already inhabited land and gives rise to a specific set of power dynamics that can be fruitfully compared with other cases that have been the subject of greater scholarly discussion. Comparison, then, is often what makes a general definition of "colony" useful for historians, but as we shall see, definitions derived from comparison also have significant shortcomings.

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2. The Comparative Approach

The second approach, comparison, involves proceeding from a number of paradigmatic examples that virtually everyone agrees constituted "colonies" and then measuring less clear cases against this yardstick. The paradigmatic examples of the British, and to a lesser extent, French Empires assume great importance in this approach. Nevertheless, the choice of conceptual yardstick is almost inevitably problematic. For one thing, the risk for Eurocentrism is clear. It is very common for historians to equate colonialism with European colonialism, even though the United States and Japan had in many ways comparable empires (in the case of the United States, I am thinking here of its colonization of the Philippines). Although they undeniably had important differences from the classic European overseas empires, the Qing, Ottoman, Mughal and other "gunpowder" empires are often excluded from this definition of "colonialism" as a matter of course, perhaps missing interesting parallels. Then again, as already discussed, scholars like Bhambra have compellingly argued that their source of political legitimacy and logic of governance was in some ways so different from modern colonial empires that referring to them as "empires" at all risks sowing conceptual confusion.

Even disregarding these problems, it is not as easy in practice as it might seem to identify a platonic "ideal type" of "colony" against which borderline cases can be judged. All modern empires were a patchwork of various legal systems and conditions that belied the homogenizing vision of a color-coded map. The historical variation is truly astounding. Just within the modern British Empire, there were small American islands mostly populated by slaves or their descendants, tiny strategic territories like Gibraltar and Singapore, the enormous British Raj (which itself was a patchwork of different types of rule), "protectorates" nominally run by local client rulers, and mostly self-ruling settler "dominions" like Canada. What criteria should we use to determine which of these (or many other examples) should become the comparative yardstick for defining a "colony"? How close or far from the ideal type could another case be and still be considered a "colony"? It is virtually impossible to answer these questions without an analytic definition. Yet another problem with the comparative approach is the fact that even many of the territories of the archetypical British Empire were not unambiguously and self-evidently "colonies" to the people who subdued or lived in them, leading us to the final, historicist, approach.

3. The Historicist Approach

This brings us to the final approach: historicism. Did people generally understand certain territories to be "colonies" in the past, during the modern Age of Empire? How was the term "colony" actually employed, officially, in the popular press, and in other contexts? Did this vary over time and between different empires?

An important indication that it was not always self-evident whether or not a territory was a "colony" in the nineteenth or early-twentieth centuries is that a number of vigorous debates took place over how to classify newly acquired lands. In conjunction with the Spanish-American War, for example, many Americans seem to have felt distinctly

uneasy with the idea that their democratic republic would be acquiring overseas "colonies" (Rystad 1975; Cullinane 2012). What did this mean in terms of the applicability of the Constitution? Would the Philippines be made a territory, in the same way as continental territories that eventually became incorporated as states, even though its large population was culturally, linguistically and (in the view of commentators at the time) racially other?

A similar debate raged over Taiwan during the entire fifty years of Japanese rule there, as I analyze in my doctoral dissertation (Hennessey 2018: Part II). Should Taiwan be made an extension of Japan proper for all intents and purposes, or should it be considered a "colony"? Japanese leaders worried about the implications of each option for their efforts to revise unequal treaties with Western powers and engaged advisors from Britain, France, and the United States to write opinion papers on the subject. This outside help did not resolve the issue, however, which soon contributed to a factional struggle among Japanese politicians. Liberal MPs worried that not extending the Meiji Constitution to Taiwan would lead to military rule outside of parliamentary control. Conservatives from a powerful military faction, on the other hand, feared that extending the constitution to Taiwan would open up for unrestricted ethnic Chinese immigration and tie their hands in their campaigns to "pacify" the island. The latter group also drew on contemporaneous French and British anti-assimilationist scholarship that extolled the merits of unambiguous "colonies" that were ruled according to separate laws. The matter was never definitively resolved; instead, temporary powers were granted to Taiwan's governor general and then repeatedly renewed until the end of World War II.

Even if a territory might have been commonly understood as a "colony" then and/or now, many actually had different official legal statuses. Canada, South Africa, and Australia were "dominions," with a large degree of self-government, called "responsible government" in the parlance of the day. French Indochina was technically a union of five main constituent parts, including royal protectorates in Cambodia and Annam, and a directly-administered colony centered on Saigon. Some colonial territories were directly ruled by companies, most famously large swaths of India by the British East India Company, but also significant sections of Northeast China by the Japanese South Manchurian Railway Company in the twentieth century (see O'Dwyer 2015). Other territories were ostensibly temporary "mandates" accorded by the League of Nations in the twentieth century, which were in turn divided into three "classes" based on how close they were deemed to be to being capable of self-government.

Depending on what kinds of questions the historian is attempting to answer, these official statuses can be significant or superfluous. If they were merely legal constructs only employed by (or perhaps even only known to) a handful of official specialists, they may well miss important aspects of the actual dynamics of the relationship with the metropole, "colonial" or otherwise. On the other hand, these legal statuses, even if poorly known, often had important legal consequences, such as what rights residents had or whether trade barriers existed with the metropole or outside regions. Nevertheless, in determining whether a territory was a "colony," I would argue that it often *is* highly

significant how it was generally perceived, whether by metropolitan voters or local nationalists.

Did official categories correspond with what was understood or described as a "colony" in everyday parlance? Based on existing research, it is not clear how well-informed ordinary residents of imperial metropoles were about colonial matters. Citing a 1951 British survey, John MacKenzie summarizes:

> Fifty-nine per cent of those interviewed in 1951 could not name a single British colony. One man suggested Lincolnshire. Three per cent thought that the United States was still a part of the Empire. And no one, perhaps not surprisingly, could distinguish the difference between a dominion and a colony. (MacKenzie 1986: 7–8)

Moreover, in some circumstances, even officials were less careful about precisely defining the constituent parts of their empire. This was often the case at world's fairs and other expositions, which laid a heavy emphasis on colonial themes from the last quarter of the nineteenth century (Geppert 2010). An official display of the American overseas Empire at the 1931 Exposition Coloniale Internationale on the outskirts of Paris lumped together Alaska, Hawai'i, Panama, the Philippines, Puerto Rico, American Samoa and the Virgin Isles, for example (Lebovics 1992: 83). Similarly, at the 1910 Japan-British Exhibition in London, the Japanese-government-sponsored colonial "Palace of the Orient" displayed Taiwan, the South Manchurian Railway Zone, Hokkaido and Korea, even though all of these had vastly different official statuses (Hennessey 2018: chap. 7). This apparent ignorance or confusion could undermine the usefulness of the historicist approach, but it could also expose actual understandings and mindsets that were not filtered by official euphemistic language.

The advent of digital history and cultural analytics promises to shed new light on historical language use in unprecedented ways. Though not focusing exactly on how the term "colony" was employed, Luke Blaxill has demonstrated the usefulness of digital methods for related questions by analyzing how the language of empire was used in turn-of-the-century British electoral politics. Although a number of historians have demonstrated the cultural importance of the Empire to ordinary Britons residing in the metropole (see, for example, MacKenzie 1984; Hall & Rose 2006), Blaxill's study of large corpora of political speeches indicates that

> The discourse of late-Victorian and Edwardian electoral politics was not consistently saturated with imperial vocabulary as has been widely assumed. Rather, empire's visibility in political language—despite its obvious centrality to British culture, society, and thought–was unstable, and dependent on the electoral weather. (Blaxill 2017: 426)

Another of Blaxill's conclusions is that the Conservatives were far more likely to use imperial rhetoric in their speeches than their Liberal opponents (Blaxill 2017). Such studies of large-scale digitized corpora hold great promise to reveal in what terms, "colonial" or otherwise, various territories were discussed in the past, but such research remains to be done at the time of writing.

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Even without such digital tools, I have found the historicist approach to be useful in forcing a reconsideration of territories that are generally not considered colonies today. I have, for example, argued that Hokkaido constituted a colony, at least in the nineteenth century. This runs against the later widespread understanding of the island as an integral part of Japan, even among the Allied Powers who forced Japan to give up its "colonial" possessions at the end of the Second World War. But not only does Hokkaido meet several analytical definitions and stand up to comparison with established "colonies"; it was run by a special administrative organ known in English as the "Colonial Office" in period publications (Hennessey 2018: 60).

On the other hand, the historicist approach can have serious drawbacks as well. Perhaps the clearest case is the example of evidently colonial territories that were technically incorporated into the metropole, such as Algeria and Korea. Algeria was made a so-called "integral" part of France, consisting of three *départements*, but the legal exclusion of the vast majority of the local population from full participation in French political life and exercise of fundamental rights belied this theoretical status. Similarly, from 1910, Korea was technically "annexed," becoming a part of the Japanese metropole, a status that was not extended to territories like Taiwan or the South Pacific League of Nations mandate of Nan'yō. Colonialism being a sensitive issue in Korea, especially as pan-Asianist anti-imperial rhetoric became increasingly important in the Japanese Empire's self-justification, the Japanese often avoided calling Korea a "colony," sometimes referring to it simply as "the peninsula." In practice, however, residents of Korea were not accorded voting rights or political participation in the Imperial Diet, being run by an authoritarian Governor General who reported only to the Japanese Emperor. Curiously, however, Koreans residing in Japan *were* granted voting rights on the same basis as the Japanese (see Duus 1995). In both cases, taking official parlance at face value clearly misses much of the colonial reality on the ground.

Conclusion

In conclusion, the analytic, comparative, and historicist approaches to defining what constitutes a "colony" all have the potential to illuminate historical cases, although each has its drawbacks. Analytic definitions are best at distilling exactly what it is about a territory that makes it "colonial," and they draw the clearest lines between "colonies" and non-colonies. Nevertheless, faced with a plethora of heterogeneous historical examples, the analytic approach still almost invariably excludes cases that, according to common sense or common usage, seem to be colonies. Many popular analytic definitions, like the "salt water test" are also rather arbitrary and have come under fire by historians and legal scholars for being too limited.

Comparison, although often the reason for establishing a globally-applicable definition of "colony" in historical scholarship, is even more arbitrary and problematic. The British Empire *was* viewed as paradigmatic even by other empires at the time, but decades of postcolonial scholarship on the dangers of eurocentrism make it clear that choosing the most well-known examples as comparative yardsticks can cause us to miss a great deal of historical reality. Entire empires like the Dutch, Portuguese, and Japanese

have been significantly marginalized in mainstream, mostly English-language, scholarship because of such a bias, despite being a crucial part of the global political system of imperial rule that helped it gain a more universal legitimacy (see Hennessey 2018: chap. 1).

Finally, the historicist approach has the advantage of revealing how various territories were actually discussed and perceived at the time. It is important here to distinguish between official terminology and popular understandings, as the former was often divorced from the latter. It could be, for example, that most British people understood and commonly discussed Australia as being a "colony" even if it was actually a dominion. Nevertheless, official distinctions were not without real-world consequences, often determining practical legal, political, and economic questions. The main drawback of the historicist approach is the exclusion of cases that could be illuminated by comparative imperial or postcolonial history that were *not* understood as colonies at the time. Some areas, like Algeria and Korea, were ostensibly incorporated into the imperial metropole, but were very "colonial" in actual practice. Other regions, like Sápmi (the homeland of the Indigenous Sámi people in northern Europe), were not clearly demarcated and perhaps not generally thought of as "colonies" historically but can usefully be studied using approaches from colonial history (Fur 2013; Höglund & Andersson Burnett 2019; Fur & Hennessey 2020). My hope is that future studies in conceptual history will further develop our knowledge of how colonial territories were understood and defined by historical actors, as the historicist approach is currently the least well-researched of the three presented here.

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