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Debates over the *Ie* and the Stem Family: Orientalism East and West

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**INTRODUCTION**

The theme of this essay is the invisibility of Japan in European social sciences and neglect of certain aspects of Europe in Japanese social sciences. Japanese social sciences have regarded the *Ie*, the Japanese traditional family, as the prototype of Japanese social organizations. Japanese management theory, which once became fashionable not only in Asia but also in Europe and North America, saw the characteristics of the *Ie* in Japanese companies. However, most European social scientists who are not Japan specialists know little about the Japanese family. They might have abstract notions such as patriarchy or *groupism*, but very few of them can answer what the Japanese family is like. Conversely, Japanese scholars know almost nothing about the debates surrounding the stem family in Europe. The stem family is, as discussed in detail later, a type of family system that has the residential rule that only one married child remains at the parental house. Trans-generational continuity of the household through vertical inheritance is another characteristic of the stem family that often arises from the first rule. In spite of the fact that these characteristics closely resemble those of the *Ie*, Japanese researchers on the family have not paid much attention to European stem families. European scholars, for their part, knowing almost nothing about the *Ie*, believe that the stem family is distinctively European.

The purpose of this paper is to ascertain the reasons for this mutual neglect by reviewing the debates on the *Ie* in Japan and the stem family in Europe over the course of a century. In the last section, I examine the most recent discussions to place the *Ie* in global context, which should be understood as an example of various attempts seeking the meaning of Japan in global context.
THE IE IN JAPANESE CONTEXT

(1) The concept of ie as Japan's cultural identity: its creation and transformation

In 1891, Hozumi Yatsuka, a professor in the law school of Tokyo Imperial University, published an article entitled "The civil code destroys loyalty and filial piety," criticizing Japan's first modern civil code which was promulgated in 1890 and was to be enforced in 1893. That civil code was called the Boissonade Civil Code because a French jurist, Gustave Emile Boissonade de Fontarabie, drafted it with Japanese jurists, most of whom had studied in France. The Japanese government established after the Meiji Restoration in 1868 decided to make French law the model for modern Japanese law. Boissonade became an advisor to the government in 1873 and started to work on the civil code in 1880. However, the first draft of 1888 was severely criticized for being based on the western idea of a family centered upon close relationships between husband and wife and between parents and children. The drafting committee added provisions concerning headship and succession at the end of the final draft, but critics, including Hozumi, were not satisfied. They insisted on postponing enforcement, causing heated debates not only among jurists and politicians but also among journalists and lay people. In the end, the critics won and a new civil code, based mainly on a draft of the German civil code, was promulgated and enforced in 1898. Chapters began with headship and succession, as if to announce the institution of the ie or house as the central idea of what eventually came to be called the Meiji Civil Code.

The well-known episode above, later called the Civil Code Debate, fatally influenced the way the ie was discussed in the following century. In the tide of modernization and westernization following the Meiji Restoration, the Japanese adopted various aspects of Western culture. However, at the same time, they desperately needed something untouched as a symbol of Japanese culture. This desire was a modern invention, because national identity itself was a creation of the modern state. The Japanese in the Meiji era chose their familial institution as their cultural symbol. Subsequent discourse concerning the ie thus has rarely been free from the ideological and political context of the time. The ie in one period was treated as a social institution to preserve the best of the traditional Japanese spirit, and, in another, was criticized as an obstacle to Japan's complete modernization.¹

After the Civil Code Debate, the ideological aura of the ie became stronger and stronger. Students were taught that the state was a large family and that
people should pay respect to the emperor just as children do to their parents. The ideology of the *te* is most evident in school textbooks. Industrialization and urbanization accelerated after the First World War, however, and changed actual family relations. In high school textbooks, pictures increasingly depicted a familial intimacy, alien to traditional notions of the *te*. This is particularly interesting when we notice that the texts in the same books increasingly stressed Confucian ideas (Muta, 1996: chapter 4). That is, the concept of the *te* tacitly imported the intimacy and family sentiment that developed with the modern family. Now the *te* was considered to have both patriarchal authority and a warmth of sentiment - a combination rare in the real world. Modern ideas are also evident in the ideology of gender roles. Historians of gender have recently shown that the ideal of ryōsai kenbo, good wife and wise mother, which had been regarded as a feudalistic remnant of the *te* system, was created under the influence of modern western ideas on the role of mothers in education (Koyama, 1991). The development of the concept of the *te* until the Second World War was not simple. The *te* was continually reinvented.

Japan's defeat in the Second World War completely inverted the ideological context of the *te*. The *te* was condemned for having been a hotbed of Japanese fascism and represented the negative side of contemporary widespread dichotomies: premodern as opposed to modern, Japanese as opposed to Western, and patriarchal as opposed to democratic. One of the leaders of the intellectual democratization movement that arose after the war was Kawashima Takeyoshi, a scholar of family law, whose book *Nihon shakai no kazokuteki kosei* (1948) could be called the starting point of postwar family theory in Japan. In his introduction, Kawashima wrote, “The greatest task presently facing the Japanese people is, needless to say, the democratization of our nation. . . . The democratic revolution cannot overlook the family system, once an object of absolute faith for the Japanese race, nor can democracy be achieved if the family system is overlooked” (Kawashima, 1948: 5). The Meiji Civil Code was abolished, and a new civil code took its place, based on the model of the western conjugal family. There was no headship clause in the new civil code, and the rule of egalitarian inheritance was established. The institution of the *te* almost disappeared from the law. However, people in rural areas retained it as a custom for decades. Many non-heir sons and daughters voluntarily gave up their inheritance rights to leave all the land and the house to the successor.

(2) An early attempt to place the *te* in global context: Nakane Chie
Many people will agree that the most influential figure in postwar family theory in Japan is Nakane Chie. Her book *Tate shakai no ningen kankei* (Personal relations in a vertical society) (Nakane, 1967b) became a million-copy seller
and was translated into foreign languages as a classic in Japanese studies. Her attitude as an opinion leader in Japanese studies is marked by her early departure from the inferiority complex toward the West that captured the Japanese for long after the defeat. As a social anthropologist, she treats Japanese society just as one type of human society without attaching explicit value judgments. Thus, we can count her work as one of the earliest attempts to place Japan in a global context.

In *Tate shakai*, she explained various aspects of Japanese society from an organizational principle that emphasizes the vertical line. Her argument is based on her research on the *ie*. She published *Kinship and Economic Organization in Rural Japan* (Nakane, 1967a) in the same year as *Tate shakai*, as a volume in the London School of Economics Monographs on Social Anthropology. She explained the Japanese household (*ie*), kinship, and village structure from an anthropologist’s viewpoint. To explain the concept of *ie*, she writes, “The primary unit of social organization in Japan is the household. In an agricultural community a household has particularly important functions as a distinct body for economic management. A household is normally formed by, or around, the nucleus of an elementary family, and may include relatives and non-relatives other than these immediate family members” (Nakane, 1967a: 1). Since she intentionally addressed this book to a foreign audience, she did not fail to add some cautions on the points that always created misunderstanding among Westerners. “The term *ie* is often used in sociological literature as an equivalent of family, but the English term *household* is closer to the conception since it includes all co-residents and is not necessarily restricted only to the members of a family” (Nakane, 1967a: 1-2). “Further, the *ie* is not simply a contemporary household as its English counterpart suggests, but is conceptualized in the time continuum from past to future, including not only the actual residential members but also dead members, with some projection also towards those yet unborn” (Nakane, 1967a: 2).

The central thesis in the book turns on succession rules. She writes, “There are two important rules of succession to the headship common throughout Japan. One is that the head should be succeeded by the ‘son’, not by any other kind of kinsman” (Nakane, 1967a: 4). Another is “that it should be by one son only; never by two or more sons jointly” (Nakane, 1967a: 5). The first rule means that the heir must be a real son or an adopted son of the head. These are the theoretical and empirical bases on which she labels the Japanese society as a “*tate shakai***” (a vertical society). She extends this idea to a general framework of household typology in *Kazoku no közō*, which was published three years later (Nakane, 1970). She distinguishes three types of household according to their structure: the “small family,” where all the children become independent from parental household after marriage; the “large family based
on solidarity of siblings," where all the sons (or daughters) remain at the parental household, taking their spouses into it; and the "family based on father-son succession line," where only one son remains at the parental household, taking his wife into it. The small family exists in its typical form in England and Sri Lanka, while the large family is found in many societies on the Eurasian continent, for example, India. The Japanese household is, needless to say, the most distinctive example of the family based on father-son succession line (Nakane, 1970).

What is interesting in Nakane's work for the purposes of this paper is that while she refers to households of the first type as "elementary families" and those of the second type as "joint families," she resists labeling the households of the third type as "stem families." She observes that "'stem' is a new term that people started to use only recently, and that it does not necessarily correspond to 'elementary' and 'joint.'" Furthermore, she is not happy with the misleading usage sometimes found where "stem" is included in "joint" or "extended" (Nakane, 1970: 34). In a different chapter, she mentions the custom of calling the Japanese family system a stem family. She does not explicitly reject it. Her point here is that Japan is the only society with a fully developed form of the "family based on father-son succession line." There are other societies centered around stem families, twentieth century Ireland for example, or Germany since the sixteenth century, but "these are only historical practice under a certain economic condition, i.e., land shortage" (Nakane, 1967a: 112). She continues, "This practice has never crystallized as a social institution as the ie system in Japan. . . . The term stem family only refers to a household composition or form. The societies with the custom to produce stem families do not necessarily have the same organizational principle" (Nakane, 1967a: 113). She moves to the Tokugawa feudalism that regarded the ie as the unit of tax payment, and to a more basic and ancient anthropological feature of Japanese society to consider "the condition in Japan different from that in Ireland or Germany" (Nakane, 1967a: 113).

Nakane placed the Japanese ie in global context and approached it employing a universal household typology. The typology is original to her, but is quite similar to the standard three types in family history and family sociology - elementary, stem and joint — originally proposed by the founding father of the concept of the stem family, Frédéric Le Play. However, her conclusion was not to regard the ie as a stem family but to distinguish it from all other examples of the stem family. She used global comparison only to make Japan's uniqueness more conspicuous. She was free from an inferiority complex toward the West and tried to place Japan in global context, but her way of positioning Japan was, so to speak, twisted by her view of ie as the core of Japanese cultural uniqueness.
Nakane's attitude was shared by contemporary theorists in Japanese studies. For example, Doi Takeo, the author of *Amae no kōzō* (The Anatomy of Dependence) did not hesitate to place the Japanese personality in global context, but only by contrasting it to what is found in the West. The uniqueness of Japanese was often explained in relation to the familial relationship. Japanese management theorists inherited the same theoretical structure as Nakane's but they flavored it with value judgments entirely reversed from the prior period. They employed the uniqueness of Japan and the Japanese, for example *groupism*, to explain its remarkable economic success. The characteristics of the *ie* brought into Japanese business organization were construed as one advantage of Japanese-style management.

(3) Seeking for diversity within Japan
After the defeat in the Second World War, some Japanese researchers, especially folklorists, sought for various popular traditions that deviated from the ideal of the *ie*. This was probably because they wanted to find a tradition that was not tainted with Japanese militarism. One of the family customs the researchers often mentioned in this context was retirement. Retirement was widely practiced almost everywhere during the Tokugawa period, except for the northeastern region. The age of retirement varied; in areas where the custom was strong, heads retired even in their forties and fifties (Ochiai, 1998: 232, 1999). The retired household head and his wife often lived a separate life from the new head's family, sometimes moving to a separate house or even forming a branch family (Omachi, 1975, Takeda, 1964). Such a type of retirement was often accompanied by ultimogeniture, particularly in the southwestern areas. The younger children moved to the retirement house when their parents retired; the same process was repeated when the next eldest one married, until the last child succeeded to the parents' household (Naito, 1973). Another custom often mentioned is primogeniture regardless of sex, a practice observed in the northeastern region. The eldest child, whether a son or a daughter, became the heir in this system (Maeda, 1976). The system is, thus, sometimes called the eldest daughter's headship. To be precise, the husband of the eldest daughter became the formal heir, marrying into the wife's household, if the eldest child was female. These customs, retirement coupled with ultimogeniture and primogeniture regardless of sex, ostensibly deviated from the rule of male primogeniture written in the Meiji Civil Code.

However, we do not necessarily have to regard these customs as deviations if we employ a more flexible definition of the *ie*. The custom of primogeniture regardless of sex is understood as a measure to shorten generation depth and thus secure as much family labor as possible to overcome cold weather and low productivity. In other words, the eldest daughter's headship is practiced to
maintain the *te*. Many family sociologists find the most typical *te* in the north-eastern families, which are large in size and manifest strong household headship. On the other hand, retirement is regarded as a remnant of the older custom of avoiding two couples in different generations living together. In spite of the common belief that coresidence of three generations has been the Japanese family tradition, historians have found that coresidence of couples in different generations (of patriline in particular) was taboo in ancient Japan. Some researchers insist that families in western Japan had a tendency to seek for the nuclear-family forms. This view seems to be supported by today's statistics that show distinct regional contrast in household size and structural complexity, as measured by proportions of nuclear family households (Sōmu-chō Tōkeigaku kyoku ed., 1990). However, Nakane Cnē raises a fundamental criticism of this view. She considers the western Japanese family to be a modified version of the *te*, because the retirement house is often built in the same compound as the main house. Nakane holds that it is only transmission of headship within a compound which should be regarded as the social unit of the *te* in those areas (Nakane, 1964). Seeking for a non-*te* type tradition in Japan is not an easy task.

Diversity according to class has been another popular topic. Since Kawashima Takeyoshi proposed that the modern Japanese *te* was created by the Meiji government based on a tradition of the warrior class, some people have insisted that commoners had no *te* in the Tokugawa period. Ueno Chizuko is a recent extreme example, declaring that “commoners had nothing to do with the *te* before Meiji” (Ueno, 1994: 69). However, empirical evidence about peasant life in the Tokugawa period reveals that they usually followed the rules of the *te*, leaving only one married child at the parental house, trying to maintain the trans-generational continuity of the *te* (For an example, see Hayami, 1983). Sometimes they failed to do so due to economic hardship or other reasons, but the people who seem to have betrayed the *te* rules were exceptional. We have to admit that majority of commoners already lived in *te* since at least the end of the seventeenth century.

No one can deny the considerable diversity by region and class that existed in Tokugawa Japan regarding family life. It is a mistake to assume a strong and uniform institution of the *te* in the Tokugawa period. However, it would be also a mistake to presume that the Tokugawa majority did not know the *te* and to regard the Meiji Civil Code as the invention of the *te*. The most recent work in quantitative family history has discovered a remarkable change in household size and household structure in the late-Tokugawa northeast. The average household size and the proportion of complex households obviously increased in the nineteenth century (Narimatsu, 1985, 1992, Ochiai, 1998: 227-8). In the same area, the name-changing patterns that demonstrate the
continuity of the family line became established in late eighteenth century (Nagata, 1999). Even an ideological movement to establish an ie closer to the modern definition started prior to the Meiji Restoration (Hirai, 1998). The function of the Meiji Civil Code was to complete this process, imposing universal rules on the whole population, dismissing diversity by region, class, and social group. In other words, the Meiji Civil Code did not so much invent the ie as standardize it.

THE STEM FAMILY IN EUROPEAN CONTEXT

(1) The stem family in the classics
The term “stem family” was coined by Frédéric Le Play (1806-82), a French social reformer of the nineteenth century. He traveled around Europe as a mining engineer and witnessed changes in people’s lives in the process of social change. He was critical of the French Revolution for causing excessive change in human relations, and he expressed a sympathy for countries undergoing more moderate changes, such as Germany. The term “stem family (famille souche)” is a translation of the term Stamnfamilie native to southern Germany (Fauve-Chamoux, 1998). His central topic as a social scientist was empirical research on working-class families in Europe, which gave him the name of the father of positivist sociology. The family organization typology that later became well known originated from his social reformer’s perspective on family research.

Le Play classified families into three types: the patriarchal family and the unstable family, at the two extremes, and the stem family in between. The patriarchal family is commonly observed among Eastern nomads, Russian peasants, and the Slavs of central Europe. All the married sons remain near the father, who exercises extensive authority over them. Family property remains undivided, and the father directs all the labor in the household. Independence of a son is strictly checked, even when he is an outstanding individual. On the contrary, the unstable family prevails among working-class people. In France, even families of higher economic status are becoming this type due to the egalitarian inheritance rule forced by the French Revolution. All the children leave home before marriage, without any obligation toward their parents and relatives. The children are free to succeed as an individual as well as to fall to a wretched condition, unable to claim any assistance for the parental family (Silver, 1982: 259-261). It is easy to see that Le Play was critical of both these extreme types. What he thought superior was the stem family where only one married child remains with the parents. All the other children can enjoy independence, since the family is perpetuated as a permanent source of protection.
for all the members throughout their lives. "It strikes a just balance between paternal authority and the freedom of the children, between stability and the improvement of social conditions" (Silver, 1982: 261). However, contrary to Le Play's expectation, the stem family never formed the majority. It underwent considerable transformation in the process of modernization.

Everybody will agree that the counterpart of Le Play in Germany was Heinrich Riehl (1823-1897). Jurgen Schlumbohm points out three basic aims and ideas that Le Play and Riehl shared:

1. Social science should be closely linked to social policy.
2. The family is the basic unit of society; good order in the house is the necessary foundation of stability in the state and society at large.
3. A well-ordered family rests on impartible immovable property; inequality between family members is the salient feature of its inner structure; a family should include several generations, grandparents, parents, and children. (Schlumbohm, 1998: 44)

It is interesting that Riehl pointed to the French as a case where the state became ungovernable when the father's rule of the family decayed, in accordance with Le Play's criticism of France and admiration of Germany. Riehl's ideal family was das ganze Haus (the whole house), with features quite close to those of Le Play's stem family. Riehl was, however, a more loquacious writer than Le Play. Riehl "implicitly glorified domination and inequality by the warm emotional tone of his description. Though he criticized contemporary urban middle classes for restricting family intimacy to the small nuclear family, he appealed to an affectionate vision of the family, so crucial to his audience, and tried to transfer this aura to his 'whole house'" (Schlumbohm, 1998: 46). This fact reminds me of what happened in modern Japan, as mentioned before in relation to high school textbooks. Neither the ie or the whole family was a simple heritage from the past, but rather was a modern construction importing the modern family's ideal of warm affections.

In the late nineteenth century, German social scientists, based on empirical research on inheritance practices, joined the force to praise the impartibility of peasant farms. This trend continued well into the twentieth century, involving Max Sering, and in the 1930s, impartible inheritance received the title of a "peculiar feature of the nordic-germanic world and its race" (Schlumbohm, 1998: 48). It was the Nazi government that took up this idea and enacted a law in 1933 to make impartible inheritance a legal obligation in all parts of Germany (Schlumbohm, 1998: 49). Regional diversity was neglected, and compensation for disinherited sons, daughters, and wives became smaller. This part of German history also reminds me of Japanese history since the Civil
Code Debate. The similarity between Germany and Japan does not cease to exist after the Second World War. Scholars based in Frankfurt criticized authoritarian German families as being a hotbed of Nazism, just as Kawashima did in Japan.

William Douglas's work comparing the academic discourse around the stem family in France and Spain is a good example through which to examine stem family debates from the viewpoint of intellectual sociology. French scholars tended to focus on dysfunctions and inequality inherent in the system, while Spanish scholars emphasized ecological balance and social stability, although both of them studied Pyrenean stem families. Douglas explains that the difference in their views was caused by the different historical background in the two countries. In France, partible inheritance was made the only legal form of inheritance by the Napoleonic Code, and the centralized government enforced this, paying no attention to regional differences. In Spain, by contrast, local autonomy was maintained in some parts of the country, where enforcement of the inheritance rules of the Spanish Civil Code, based on the Napoleonic Code, was limited. In addition, an intellectual movement to seek for Spanish cultural identity in the late nineteenth century tried to rediscover the genuine Spanish tradition in rural areas. Ethnographical research played an important role in this movement (Douglas, 1993).

Japanese and German cases are more similar to the Spanish case than to the French. All three countries, Japan, Germany, and Spain, were placed in a marginal position in the modern world, at least in the late nineteenth century. They rediscovered or, in a way, created the stem family as the core of their cultural tradition, which they had to protect against the tide of modernization. However, there were also differences among the three. Above all, the timing and extent of legalization of the stem family was different. The legalization of the _ie_ throughout the country was the most complete in Japan, as Nakane pointed out.

(2) Myth or reality?
Research into the history of the family after the Second World War started with George Peter Murdock's _Social Structure_, published in 1949 (Murdock, 1949). He asserted the universality of the nuclear family, a couple (or one of them) with (or without) their unmarried children, as the elementary unit of a household, which soon became a dominant paradigm all over the world. Many people believed that the transformation of a large complex family into a small simple family was a natural law of modernization (Goode, 1963).

It was Peter Laslett of the Cambridge Group for the History of Population and Social Structure who attacked the nuclearization theory of the family as a myth. He started his career as a historian of knowledge. When he studied the
debates between Locke and Filmer, he began to doubt the existence in the past of the large patriarchal family that Filmer admired and Locke criticized. Laslett started empirical research on households in the past, employing the methods of historical demography. He found that the majority of English households in the past had a simple structure, i.e., the nuclear family structure (Laslett, 1983). He tried to extend this finding to other parts of Europe (Laslett and Wall, 1972). The stem family that Le Play and Riehl praised was about to be pronounced unreal. Probably it was not a coincidence that the theories of both Murdock and Laslett were based on the idea of dominance of the nuclear family. It was, in a way, the ideology of the winners in the war who insisted that their family form was universal.

Much discussion occurred after Laslett. Lutz Berkner, drawing on empirical research in Austria, raised the first objection. He insisted that “first, the stem family did and does exist as an important part of the social structure in many parts of rural Western Europe, and second, that the stem family structure does not necessarily emerge from empirical studies of demographic statistics unless the developmental cycle of the family and household are taken into consideration in the analysis” (Berkner, 1972). His point is that the proportion of the stem family observed in historical data cannot be very high, because the stem family system produces many nuclear families at certain stage of the household life cycle. In general, demographic constraints, i.e., lack of children or early deaths of parents, restrain people from forming stem families even when they intended to. Demographic constraints have become a long-standing topic in family history since then. Various types of microsimulation methods have been developed. Employing his own microsimulation method, Steven Ruggles estimated the rise of extended households even in nineteenth century England and United States (Ruggles, 1987).

Another type of objection to Laslett focuses on the regional diversity within Europe. French family historians illuminate the differences between families in northern France and southern France. In contrast to the small and simple northern French family, which is similar to the English, the southern French family is larger and more complex in structure.

After a long debate, the meaning of Laslett's discovery is now almost fixed in the field. He uncovered the myth of large complex family in the past in northwestern Europe, including England, northern France, and the Low Countries. The proportions of such households were never high in these areas. However, it is still an open question whether this was because the people of these areas had no intention of forming complex families or because of demographic or other constraints. Family historians, including Laslett himself, stopped extending the implication of his discovery to the rest of Europe, admitting the tradition of complex households in southern and eastern
Europe. The geography of family forms in Europe became the next topic.\textsuperscript{12}

(3) The geography of the stem family
An new era of European family history began with John Hajnal’s article “Two Kinds of Preindustrial Household Formation System” in 1982 (Hajnal, 1982). Hajnal contrasted the northwest household formation system to the eastern household formation system, associating these with the nuclear family and the joint family respectively. The importance of his framework is that it not only deals with household typology, but unites household structure, marriage and fertility, and labor institution in one perspective. The northwest system, the focus of his theory, is characterized by three elements that he calls the household formation rules:

1. The nuclear family system, in which married children never coreside with the parents.
2. A low proportion of married adults due to a high age at marriage, especially for women, and a high celibacy rate.
3. The institution of life-cycle service, in which unmarried sons and daughters leave their parental household to become servants in other households.

The three elements are closely linked. The children who leave the parental household spend some years before marriage as servants in other households to save money to establish a new household.\textsuperscript{13} By contrast, the eastern system follows two rules:

1. The joint family system, in which all the children of one sex coreside with the parents even after marriage.
2. A high proportion of married adults due to a low age at marriage and a low celibacy rate.

The eastern system is applied to eastern Europe and most parts of Asia, in short, to almost all societies that exist east of the line from St. Petersburg to Trieste. This line is the eastern border of the European Marriage Pattern that Hajnal proposed in his previous article (Hajnal, 1965).

Where, then, did Hajnal place the stem family in his map? He writes in a note that the stem family system with a retirement custom for the household head is “compatible with the general north-west European household formation rules” (Hajnal, 1982: 486). The retirement of the head is commonly observed in northern and central Europe. In this area one married child sometimes lives with the parents, but never before the parents retire. Michael
Mitterauer calls these families the “retirement family” (Mitterauer, 1990) to distinguish them from the stem family that premises a strong patriarchal power following Le Play’s definition. Regardless of whether or not the term “stem family” is invoked, Hajnal and Mitterauer share the view that the stem family in this area does not differ essentially from the nuclear family of western Europe.

Emmanuel Todd proposed another framework that no contemporary family historian can neglect. He undertook a project to explain economy, education, religion, ideology, and almost everything in European history by the family system (Todd, 1990). Whatever the validity of his grand plan, his typology of family systems and the maps he drew to show their geographical distribution are informative and useful. He employs two criteria to distinguish family systems: equality in inheritance, and authority shown in residential rules. Combining the two dimensions, he proposes four categories of family system: the absolute nuclear family, the egalitarian nuclear family, the stem family, and the communal family. The stem family is defined here as a combination of the authoritarian parent-child relationship resulting in the coresidence of a child with the parents, and inequality among siblings accompanied by inegalitarian inheritance (Todd, 1990: chapter 1).

Todd shows four areas where the stem family prevails. He also suggests the areas where incomplete versions of the stem family exist. The four major areas are named after their dominant ethnic groups:

1. German bloc,
2. Northern Scandinavian bloc,
3. Celtic bloc,
4. Occitan and Northern Iberian bloc (Todd, 1990: chapter 1),

Interestingly enough, all of them are areas where independent peasant households are the unit of agricultural production (Todd, 1990: chapter 2). Possession of land to inherit seems to be a precondition for the existence of the stem family. However, although Todd does not explicitly discuss this, the stem families in different areas are not identical. The retirement custom of the head is observed in the German bloc and the Northern Scandinavian bloc, as already mentioned (Berkner, 1972: 400-402, Mitterauer, 1990), but not in the Occitan and Northern Iberian bloc. We cannot neglect the regional diversity of the stem family within Europe.
ORIENTALISM IN THE EAST AND THE WEST

After reviewing the research history and discourse around the 'te' and the stem family in Japan and Europe, I am struck by the fact that very few comments have been made concerning the relationship of each to the other. Nakane referred to the term "stem family," but she did not use it in her analysis in spite of its resemblance to her concept of "family based on father-son succession line." She only mentioned Irish and German stem families very briefly and declared that they were completely different from the Japanese 'te'. In Europe, there were almost no comments on the 'te'. Europeans have studied the stem family only as a complex form of household observed in Europe.

The reason for the lack of communication lies in the research history itself. Both concepts, the 'te' and the stem family, were created in reaction to the overwhelming tide of modernization and have been regarded as romantic symbols of cultural tradition. It is not difficult to find the theoretical structure of Orientalism here. The areas where the stem family prevailed were relatively marginal areas in the modern world, at least until the end of the nineteenth century. These areas may be called the Orient, even when they are geographically in Europe. It is important to note that the Oriental image is not only given by others. The people of Oriental areas quite often construct their identity for themselves around features called Oriental (Ochiai, 2000). Even people in the central areas construct Oriental images of their own past. We can call Romanticism a pattern of Orientalism in which a society reflects an Oriental image on their own past.

The outcome of the above process is quite interesting. The self-portraits of these societies (or their own pasts) become surprisingly alike because they are all constructed as Oriental, i.e., in opposition to Modern. However, the people of each society tend to believe that these features are uniquely theirs, because they regard the features as defining their cultural and ethnic identity. Identity should be unique by definition. This preconception occupied not only ordinary people but also researchers. It directed them to presume comparison to be meaningless or to undertake comparison only to make uniqueness more conspicuous. This is why Japanese scholars have been so ignorant of European stem families and European scholars have paid almost no attention to the Japanese 'te' and other stem-family-type families in non-European areas.

PLACING THE 'TE' IN GLOBAL CONTEXT

(1) Is the 'te' a stem family?
Serious efforts to place the Japanese *te* in a global context started only recently. First of all, is it appropriate to call the *te* a stem family? It is a common procedure nowadays to translate *te* in Japanese as “stem family” in English. A Japanese technical term *chokkei kazoku* is also translated as “stem family.” However, as mentioned before, Nakane, a cautious anthropologist, does not use the term “stem family” as the translation of either *te* or *chokkei kazoku* because the connotations of these Japanese terms, she holds, are not exactly the same as that of “stem family.” Michel Verdon, who has developed a theory of the stem family, explicitly excludes the *te* from his definition of the stem family. He writes in an appendix, “The application of the concept of stem family to Japan, Korea and Vietnam is also questionable. In those societies, co-residence was organized around an ancestral cult, and not around the transmission of property... In Western Europe, on the contrary, it was not the line which continued, but the estate” (Verdon, 1979: 104). I do not deny the importance of his work, which encompasses various Asian and European families in one perspective, but I believe that his understanding of the *te* and other Asian families is not sufficient for generalization. No Japanese sociologist would deny the centrality of the transmission of the estate in the continuity of the *te*. The difference between the *te* and the stem family in Western Europe is not as clear cut as he insists. Verdon might have overestimated the cultural distance between the East and West.

(2) The *te* as a stem family
There have been some researchers who try to understand the global position of the *te* by regarding it as a stem family. Peter Laslett is one of the earliest. He summarizes Le Play’s definition of the stem family as follows: “Le Play himself certainly thought of *la famille souche* both as a domestic group and as a patriline... As a domestic group it seems definitely to have consisted in an extended family of two married couples with their children, the head of the second being the child of the first, an arrangement to which we shall give the title multiple family household, disposed downwards... As a patriline, or as patriline permitting female succession occasionally, Le Play’s stem family closely resembles the Japanese *te*. The stem family patriline, then, was the stem family household perpetuated, which is presumably why Le Play does not seem to have wished to distinguish the two” (Laslett, 1972: 19-20). Although the definition of the stem family “has taken on a variety of meanings, some of them rather vague and metaphorical.” as Josef Ehmer comments (Ehmer, 1998: 59), the two aspects in Le Play-Laslett’s brief definition are always at the center of any definition. If we employ these two as the criteria for the stem family, there is no problem in calling the *te* a stem family as Laslett does. Empirical results that Laslett has collected are also supportive. Among the six
areas of the world that he compared, the Japanese sample shows the highest proportions of stem families and other types of complex households. The Japanese ife is, to Laslett, an exceptional family system that "seems deliberately to have provided for something like the gathering under one roof of the extended kin group which has been so widely and so unjustifiably regarded as typical of all the traditional households of the past" (Laslett, 1972: 60).

(3) The ife as a stem family of the Western European type
Arthur Wolf and Susan Hanley propose a provocative hypothesis in the introduction to Family and Population in East Asian History, of which they are the editors. They write, "the contrast between Western and Eastern Europe may have an East Asian parallel. From the global perspective necessary to see such broad patterns, it appears that China is to Japan as Eastern is to Western Europe" (Hanley and Wolf, 1985: 3). This statement is a big challenge, because Japan and China have been regarded as one category for a long time. For example, Malthus argued that "the state of Japan resembles in so many respects that of China, that a particular consideration of it would lead into many repetitions" (Hanley and Wolf, 1985: 1). On the contrary, Wolf and Hanley declared that "it is clear that the Japanese family system was a stem system of the Western European type" (Hanley and Wolf, 1985: 4). Japan has traveled a long way from the side of China to Western Europe. The authors regard the stem family as a typical family type of Western Europe. Needless to say, they have Hajnal's framework in mind. "In sum, it appears that where Western European families limited their fertility by a combination of late marriage and celibacy, the Japanese accomplished the same end by a combination of late marriage and deliberate birth control" (Hanley and Wolf, 1985: 6). They offer evidence to support their claim that "marriage was universal but relatively late, and fertility was controlled by the most fecund portion of the population" in Japan (Hanley and Wolf, 1985: 7). After quoting Hajnal's argument "that late marriage may allow for the accumulation of savings and thereby stimulate a demand for goods other than those needed for immediate survival" (Hanley and Wolf, 1985: 12), Wolf and Hanley proceed to a bold conclusion. "Having seen that the European marriage pattern is not unique, we are led to wonder about the source of Japan's economic 'take-off.' Could it be that similar marriage patterns explain why northwestern Europe and Japan led their regions in economic development? And if this is so, might it not be that one of the preconditions for modern economic development is a stem family system?" (Hanley and Wolf, 1985: 12).

Japan's economic success has changed the question of modernization from "Why Europe?" to "Why Europe and Japan?" The answer is their uniqueness, the stem family. The whole story looks brilliant, but it includes many prob-
Debates over the Ie and the Stem Family:

...lems. Above all, western Europe should be firstly characterized by the nuclear family, not by the stem family. Wolf and Hanley underrate the difference between the two family types, as does Hajnal. Looking back from today, the fifteen years since the publication of their book have completely changed the context. China's economic growth makes us suspicious about the validity of any explanation linking economic success to a certain type of family system. The hypothesis that the *te* is a stem family system of the western European type is still worth examining, but its further implications have become almost meaningless.

(4) Recent discussions
Both Laurel Cornell and Saitō Osamu start with Hajnal's framework and try to establish the concept of the stem household system in Japan. Cornell lists the theoretical household formation rules of the stem household system as different from those of either the nuclear family or the joint family, and then mentions some empirical evidence from Tokugawa Japan (Cornell, 1987). Saitō criticizes both the view that the Japanese family belongs to the same type as the western European family, i.e., is compatible with the nuclear family, and the notion that the Japanese family is a joint family. Saitō, as well as Cornell, wishes to establish a third household type, the genuine stem family. The first view Saitō criticizes is, needless to say, that of Wolf and Hanley. Saitō distinguishes the ordinary stem family in which the father keeps the headship from the stem family with a retirement custom. Referring to Hajnal, Saitō holds that the latter type of stem family is compatible with the nuclear family system, but the former is not. Saitō concludes that the Japanese family system is a stem family system, different from both the nuclear system and the joint system, and that the Japanese stem family is also different from the stem family in central Europe (Saitō, 1998).

I agree that proposing a third household type is theoretically adequate, because the stem family should not always be compatible with the nuclear family as Hajnal holds. However, Saitō's claim to find a genuine stem family in the Japanese *te*, and his proposal that strictly distinguishes it from the European stem family remind me of Nakane 30 years ago. I would rather urge the need to look into internal diversity in both Japan and Europe. I have already mentioned the regional diversity within Europe. The retirement family is common in northern and central Europe, but the head seems to keep power almost until death in southern regions. The stem family in southern Europe is a genuine stem family that nicely fits Le Play's original definition. Regional diversity is also observed within Japan. The heads customarily retire in several years after marriage of the heirs in some areas, but retirement is exceptional in other areas (Ochiai, 1998 and 1999). It is important to emphasize that the
retirement family is a common form of Japanese stem family. The stem family in some parts of Japan looks similar to the northern and central European stem family, whereas the stem family in other parts of Japan seems closer to the southern European stem family.

Comparison becomes more interesting when we include Asian stem families in our perspective. The succession pattern of the Thai family is similar to that of the southwestern Japanese family, which is characterized by the branching-out custom coupled with ultimogeniture (Limanonda, 1998). We should think of a continuum of the stem family from Southeast Asia to southwestern Japan, then to northeastern Japan (Fauve-Chamoux and Ochiai, 1998: 15). According to Tsubouchi Yoshihiro, the stem family in Southeast Asia is better understood as an extended nuclear family (Fauve-Chamoux and Ochiai, 1998: 14). It does not aim for the stem family structure but just forms it in one stage of the developmental cycle. We have to go beyond the dichotomy of East and West or of Japan and Europe not only to understand others but to understand ourselves.

CONCLUDING REMARKS

Both Europe and Japan have long research histories for the stem family or the \( se \). The concepts of the stem family and the \( se \) are surprisingly alike, but they have rarely been analyzed comparatively. I hold that the ideological bias toward regarding the stem family and the \( se \) as the core of cultural identity has hindered scholars from seriously comparing them with other families. We can easily find the structure of Orientalism on both sides. People in both areas have drawn very similar self-portraits, because both portraits are constructed as the antipode of Modernity. Ironically, each of them has regarded their self-portrait as unique because they have made it the core of their identity.

Serious efforts to place the Japanese \( se \) in global family history have started only recently. The patterns (and difficulties) of placing the \( se \) reflect the patterns (and difficulties) of placing Japan in world history. Some earlier works regarded the \( se \) as a peculiar example from the Far East. Even scholars who were aware of the similarities between the \( se \) and the stem family tried to find decisive differences. Japan's economic success, however, changed the intellectual framework. The stem family, common to Europe and Japan, came to be invoked to explain "Why Europe and Japan?" Recent works are less passionate. The focus has now moved to the question of whether the \( se \) or Japan, is one or not. As a participant in the debate myself, I have proposed to pay more attention to regional diversity within both Europe and Japan. We cannot deny that there are different types of stem family in each area. Would it be meaning-
ful and useful to compare the "European stem family" and the "Japanese ie," dismissing varieties within them? I would urge re-investigating various ie or Japanese stem families by putting them on the same ground with other Asian and European stem families. Such rethinking, I suggest, may provide new and unexpected insights into both the world and ourselves.

Notes

1. Let me briefly look at the history of the ie prior to the Meiji Civil Code, because it is another misunderstanding to call the ie a genuine modern invention. Most historians who study the ie would agree that the institution of the ie emerged from the aristocracy and the warrior class at the end of Heian period, as a branch of the yi or clan. Since then, the ie remained an important unit of social organization for them, strengthening primogeniture and weakening women's power. The existence of the ie among the warriors and the aristocrats prior to the Meiji Restoration is therefore not questionable. The question is raised only for commoners, if at all. For more discussions, see the section regarding the diversity within Japan.

2. Nakane does not use the term chokkei kazoku as the translation of stem family. When she says chokkei kazoku, she means the Japanese family composed only of vertical kin, i.e., the head, his wife, the ascending generations, the heir, and the wife and children of the heir. Siblings of the head and married siblings of the heir are excluded from it (Nakane, 1967a).


4. To be precise, except for the northeastern region other than the eastern areas of Fukushima prefecture. Retirement became legally restricted after the establishment of the Meiji Civil Code, permitted only for male heads over 60 and for female heads (Takeda, 1964: 74-5, 5).

5. The custom of primogeniture regardless of sex is called ane-katoku (eldest daughter headship) in folk terms, because the succession through the female line is conspicuous.

6. Shimizu Hiroaki, synthesizing the discussions on regional diversity, proposes a framework in which traditional Japanese families fall into two main categories: The stem and joint families found all over the country but mainly in the northeastern region and the nuclear families distributed around the southwestern region (Shimizu, 1986: 8).

7. Lower class people of urban areas and villagers in fishing communities in the westernmost area of Kyushu might have been such exceptions.


10. The type of household that corresponds to the stem family does not exist in Murdock's classification.

11. Laslett started a microsimulation project with Kenneth Wachter to answer Berkner's question and published the result in 1978 that the demographic effect was not so strong as alleged (Wachter, Hammel, and Laslett, 1978). However, Steven Ruggles criticized the microsimulation method Wachter and Laslett developed (SOCSIM) and
proposed his own method MOMSIM (Ruggles, 1987). Laslett is undertaking another method of microsimulation, CAMSIM, developed by James Smith and Jim Oeppen of the Cambridge Group.

12. Laslett proposes the "four region hypothesis" of European family history. See Laslett (1985).

13. Young people in the northwest household formation system had to delay marriage when economic conditions were unfavorable, because they needed more years to save enough to marry, resulting in an unconscious effect of fertility decline. The Northwest household system thus had the homeostatic function of keeping a balance between population and economy. See Hajnal (1982).

14 Antoinette Fauve-Chamoux has recently found retirement cases in the nineteenth century Pyrenees (Fauve-Chamoux, 1999).

15. Hayami Akira proposes a three- or four-region hypothesis regarding the regional diversity within Japan (Hayami, 1997 243).

16. We can say that Tsubouchi's comment is the counterpart in Asia of Hajnal's and Mitterauer's in Europe.

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Debates over the *Ie* and the Stem Family: Orientalism East and West


