Enrico Dal Lago

Emancipation from Slavery and Serfdom, and Land Rights

The Americas and Eastern Europe Compared

Abstract

A comparative study of the complex processes of emancipation in the Americas and Eastern Europe shows that, in both cases, the established governments were the main agents that decreed the end of unfree labour, with the single exception represented by the case of the Haitian Revolution. As a result, in most cases, the governments' provisions were conservative in conception and practice and tended to safeguard the interests of slaveholders and serfowners, rather than those of slaves and serfs, by providing the former with some type of compensation for their loss in capital and by keeping the latter in some transitional form of coerced labour before the achievement of their full free status. Here, the exception was the 1863 United States Emancipation Proclamation, which declared African American slaves immediately free and with no compensation for slaveholders, with some similarities with Brazil's 1888 Golden Law. In the case of the ex-slaves' and the ex-serfs' rights to own land, however, all the governments enacting emancipation acted in remarkably similar ways, by providing no avenues for the liberated labourers' immediate acquisition of landed property, and thus effectively preventing the formation of landed peasantries out of the newly freed populations of the Americas and Eastern Europe for many decades.

Keywords: *Americas, Eastern Europe, Slavery, Serfdom, Comparative Study, 19th Century*

Introduction

Both slavery in the Americas and serfdom in Eastern Europe were essentially agrarian systems based on unfree labour. In both agrarian systems, ownership of labourers and ownership of land played crucial roles, albeit in different ways and at different times. While, in the American slave system, ownership of land became crucial for planters only after emancipation as a means to control ex-slaves and other groups of free labourers, in the Eastern European serf system, ownership of land was an important means of

control of the workforce by the landowners both before and after emancipation. Despite this important difference, several scholars have noted important structural similarities between slavery and serfdom, but the only monographic study that has analysed the two labour systems by means of a sustained comparison remains Peter Kolchin's *Unfree Labor: American Slavery and Russian Serfdom* (1987). Focusing on the United States and Russia, Peter Kolchin has shown that American slavery and the so-called "second serfdom" in Eastern Europe—to distinguish it from the first form of serfdom that was spread in the Middle Ages—arose around the same time (16th-17th centuries) largely as a result of similar conditions—specifically, abundance of land to cultivate, but scarcity of available workforce—leading to a solution according to which the few workers were owned by the landowners and/or tied to the land. Following this very important work, other studies have compared a broader range of slave and serf systems at different points in time, as in the essays included in Michael Bush's edited collection *Serfdom and Slavery* (1996), and in Michael Bush's own authored book *Servitude in Modern Times* (2000), while more recently, Peter Kolchin himself has written a number of very important articles on comparisons between United States slave emancipation and Russian serf emancipation.[1]

It is fair to say, thus, that scholarly understanding has grown more and more sophisticated with regard to both American slavery and Eastern European serfdom, and the equally growing number of comparative studies has reflected this increased understanding of the two systems of unfree labour. Yet, for the most part, especially in their comparative reflections, scholars have focused almost exclusively on topics such as elite ideology, labour management and practices, the master-bondsmen relationship, the bondsmen's attempts at resistance to exploitation, and their final achievement of freedom. With the notable exceptions of a few scholars, the majority of the comparative works have paid little attention to the crucial element of landownership as a means of economic and social control by the ex-slaveholding and ex-serfowning elites, and to the consequent importance that both slaves and serfs attached to the right to own land as an indispensable corollary to the acquisition of freedom and an indispensable prerequisite for the completion of the emancipation process—a remarkable omission, given that scholars working on both slave emancipation and serf emancipation have debated this issue in isolation for a long time. The importance of the right to own land showed very clearly, for example, in the two major revolts that shook slavery in the Americas and

---

[1]   See Peter Kolchin: Unfree Labor: American Slavery and Russian Serfdom, Cambridge 1987; Michael L. Bush (ed.): Serfdom and Slavery: Studies in Legal Bondage, London 1996; and Michael L. Bush: Servitude in Modern Times, Cambridge 2000. See also, among others, Peter Kolchin: Some Controversial Questions Concerning Emancipation from Nineteenth-Century Slavery and Serfdom, in: Michael L. Bush (ed.): Serfdom and Slavery: Studies in Legal Bondage, pp. 58–66; and Peter Kolchin: Comparative Perspectives on Emancipation in the U.S. South: Reconstruction, Radicalism, and Russia, in: Journal of the Civil War Era 2:2 (2012), pp. 203–232.

serfdom in Russia in the latter decades of the eighteenth century: the Haitian Revolution (1791–1804) and the Third Peasant War (1773–1774)—two events that would deserve their own comparative study.[2]

In the Haitian Revolution, under the leadership of Toussaint L'Ouverture, the black slaves of the French colony of Saint Domingue, victims of savage exploitation in the Haitian plantations, at the heart of the most profitable sugar and coffee economies in the world, revolted against their white and mulatto masters in 1791, and, after slaughtering them, by 1793, they were able to proclaim the end of slavery. As they managed to take control of the island, the self-liberated slaves succeeded also in repelling subsequent attempts by different European colonial powers to take control of Haiti, and ultimately in proclaiming independence from France in 1804. Thus, uniquely in the known history of the world, the slaves' revolt in Haiti not only was successful, but led to the slaves' permanent freedom. Yet, the collapse of sugar and coffee production resulting from the slaves' revolt threatened the entire economy of the island, and, with it, Haiti's realistic possibilities of remaining independent. With the plantations and the complex irrigation systems built by the French colonists abandoned and in ruins, and with much of the land appropriated by the ex-slaves that was used by them for little more than subsistence cultivation, Toussaint L'Ouverture was forced to try and restore at least some of the former plantation economy through heavy labour obligation, encountering much resistance from the ex-slaves. Still, by 1811, only a few years after the achievement of independence, under Alexander Petion, the Haitian Republic had definitively abandoned the idea of restoring the plantation economy and had proceeded on the road of agrarian reform, "distributing almost 100,000 hectares of land" in small plots to the island's black population, even though in most of the cases, according to Ada Ferrer, "much of the land distributed went to the military, with higher-ranking officers receiving larger plots." Only in 1820, thus, the Haitian peasantry finally managed to benefit from "the land reform project that the revolutionary leadership had shunned during and after independence, setting up small family farms wherever they could."[3]

2   The exceptions include especially Steven Hahn: Class and State in Postemancipation Societies: Southern Planters in Comparative Perspective, in: American Historical Review 95:1 (1990), pp. 75–98; and Peter Kolchin: Reexamining Southern Emancipation in Comparative Perspective, in: Journal of Southern History 81:1 (2015), pp. 7–40. Peter Kolchin has hinted at possible comparative points between the two revolts especially in Peter Kolchin: The Process of Confrontation: Patterns of Resistance to Bondage in Nineteenth-Century Russia and the United States, in: Journal of Social History 11:4 (1978), pp. 457–459.

3   Ada Ferrer: Haiti, Free Soil and Antislavery in the Revolutionary Atlantic, in: American Historical Review 117:1 (2012), p. 44; and Christopher McAuley: Race and the Progress of the American Revolutions, in: John Foran (ed.): Theorizing Revolutions, London 2003, p. 173. See also Robin Blackburn: Haiti, Slavery, and the Age of Democratic Revolutions, in: William & Mary Quarterly 63:4 (2006), pp. 643–674; and Laurent Dubois: Avengers of the New World: The Story of the Haitian Revolution, Cambridge 2005.

Providing an interesting parallel to the Haitian Revolution, Russia's Third Peasant War of 1773–75 witnessed Yemelyan Pugachev lead the Russian serfs—who were as exploited by their owners as St. Domingue's slaves were, though in a much less profitable economy based on grain—together with free peasants and Cossacks, all suffering from heavy taxation and the demands of military recruitment, in a rebellion that lasted for the best part of two years. In 1774, after establishing an alternative government to the Tsarist one in the Ural Mountains and claiming to be the legitimate Tsar Peter III, Yemelyan Pugachev was able to proclaim the end of serfdom—thus gaining a large number of followers by effectively meeting the demands of Russia's serfs who wanted no less than to be free and able to cultivate their own land—as well as of taxation, and of all military demands. Unlike Toussaint L'Ouverture, though, Yemelyan Pugachev was not able to fend off effectively the attacks by Russian Empress Catherine II's army, and eventually he was defeated, captured and executed, leading to the end of the Third Peasant War by 1775. Therefore, the case-study of the Third Peasant War in Russia provides a striking contrast with the Haitian Revolution in a number of ways, first and foremost because of the opposite outcome, but also as a result of the different types of leadership typified by Toussaint L'Ouverture and Yemelyan Pugachev, and the different types of ideal society that the two leaders envisioned as they led their rebellions. At the same time, an important similarity between the two leaders is in the fact that they both intended to proceed to dismantle the land arrangements typical of the Old Order and emancipate the unfree populations that constituted the bulk of the agrarian workforce of their regions—Haiti's slaves and Russia's serfs.[4]

Yet, the two revolutionary leaders also maintained elements of autocratic rule, since Toussaint L'Ouverture attempted to enforce the slaves' return to plantation labour, while Yemelyan Pugachev fashioned himself as a Tsar, though a benevolent one, ruling over his subjects. More importantly, in both cases, the unfree agrarian workers' desire to own land, together with the impulse to achieve freedom, played a crucial part in the initial success of the insurrection. Yet, in both cases, despite the different outcomes, that desire was frustrated, signalling the fact that the social *status quo* would not change for several decades in the two regions, and in Russia's case for almost a century. In Haiti, this occurred first because economic needs led the very leadership of the Haitian Revolution to prompt the ex-slaves to go back to work on the plantations, and later as a result of the militaries' control of the process of land redistribution, even though by the early decades of the nineteenth century the situation had changed for the better. Conversely, in Russia, the

---

4   On Yemelyan Pugachev's revolt, see especially John T. Alexander: Autocratic Politics in a National Crisis: The Imperial Russian Government and Pugachev's Revolt, 1773–1775, Bloomington 1969; Philip Longworth: Peasant Leadership and the Pugachev's Revolt, in: Journal of Peasant Studies 2:2 (1975), pp. 173–205; and Janet Hartley: Russia, 1762–1825: Military Power, the State, and the People, Santa Barbara 2008, pp. 114–118.

defeated rebellion at the end of the Third Peasant War effectively curbed the serfs' chances to own land altogether until the Russian government's 1861 decree on the actual abolition of serfdom. Yet, the common pattern of the slaves' and serfs' inability to take immediate and full control of the land they worked on would characterise virtually all the processes of emancipation from slavery in the Americas and from serfdom in Eastern Europe in the course of the nineteenth century.

Emancipation in the Americas: Ending Slavery

The Haitian Revolution put in motion a process that led to crucial antislavery provisions by different governments, first with the abolition of the Atlantic slave trade by Britain (1807) and the United States (1808), and then, a few decades later, with the abolition of slavery in the British colonies (1833, effective from 1834) and in the French colonies (1848). In both the British and the French cases, as in the overwhelming majority of the cases with governmental decrees freeing slaves, the main issue was compensation for the slaveholders, who were seen as having relinquished a large amount of capital with the loss of their slaves. Compensation occurred, typically, in the form of *corvée* labour called "apprenticeship"—despite the nominally free status of the liberated slaves—for a certain number of years. In contrast, slaves everywhere in the Americas wanted not only freedom, but also the means to be self-sufficient, and therefore some form of ownership of the land on which they had toiled for so long—the core of the so-called "land question." Yet, this was never part of the agenda of any government that enacted emancipation, and, as far as the British and French governments were concerned, in addition to being forced to continue to work for free for their masters in apprenticeship schemes, slaves were also not entitled to any portion of land. By the 1850s, slavery survived in the Americas in three specific regions: the United States South, Cuba and Brazil, where crops were grown by extremely large slave populations—from 400.000 in Cuba to 1.5 million in Brazil, and 4 million in the United States South—both on large plantations and smaller farms owned by very wealthy master classes that also owned the majority of the arable land. A number of scholars have called the type of profit-oriented and highly exploitative slave system that characterised the three regions mentioned above "second slavery"—to distinguish it from the previous colonial type in the Americas before the Haitian Revolution—and they have argued that it was a highly developed form of capitalist production that commanded the nineteenth-century world market. Yet, by the late nineteenth century, slavery was

eradicated in all these large slave societies, while, at the same time, the "land question" was not resolved, since it was never a real issue for any of the three governments of the regions where the "second slavery" had thrived.[5]

In the United States, after decades of political tensions and sectional conflicts caused by the division of the country between states that allowed slavery and slaves that banned it, emancipation finally came as a consequence of the American Civil War, which erupted in 1861, when 11 southern states seceded from the United States forming the Confederate nation, a republic dedicated to the protection of the slave system from American governmental interference. Secession and the creation of the Confederate nation, in turn, led President Abraham Lincoln to wage war in order to bring the 11 southern states back into the Union. Slavery was a central issue in the war, particularly because the Confederacy comprised those southern states that relied either entirely or for the most part on the slave economy and had the largest slave population, while the Union was mostly made of those states where slavery had been abolished for up to half a century or more by 1861. A combination of factors—chief among them the hundreds of thousands of slaves who ran away to Union camps from the start of the war, the pressure coming from abolitionists, and the need to strike at the heart of the Confederate power to end a long and costly war—led Abraham Lincoln to issue the Emancipation Proclamation, drafted in September 1862, and effective from 1 January 1863. Despite the fact that Abraham Lincoln justified it as an act of war, it was an unprecedented revolutionary document that declared the slaves immediately, unconditionally, and forever free, and did not include any provision for compensation to slaveholders.[6]

The Emancipation Proclamation also had guidelines for the inclusion of freed slaves in the Union army—and, as a result, by the end of the war, almost 200,000 African Americans had served in it. There is no doubt that many freed slaves believed that emancipation would have been accompanied by some form of land redistribution. Moreover, in his famous and devastating March to the Sea, from Atlanta to the Carolinas, into the heart of the Confederacy, in 1864, Union General William T. Sherman issued Special Field Order 15, which, according to Ira Berlin et al., "authorized families of former slaves to occupy

---

5   See Steven Hahn: Class and State in Postemancipation Societies: Southern Planters in Comparative Perspective, pp. 75–98; Eric Foner: Nothing But Freedom: Emancipation and Its Legacies, Baton Rouge 1983; Dale W. Tomich: The Second Slavery: Bonded Labour and the Transformation of the Nineteenth-Century World Economy, in: Dale W. Tomich: Through the Prism of Slavery: Labour, Capital, and World Economy, Lanham 2004, pp. 56–73; and Enrico Dal Lago: American Slavery, Atlantic Slavery, and Beyond: The U.S. "Peculiar Institution" in International Perspective, Boulder 2012, pp. 145–172.

6   See Bruce Levine: The Fall of the House of Dixie: the Civil War and the Social Revolution that Transformed the South, New York 2013; Eric Foner: The Fiery Trial: Abraham Lincoln and American Slavery, New York 2010; and James Oakes: Freedom National: The Destruction of Slavery in the United States, 1861–1865, New York 2013.

as much as forty acres […] for which they would receive 'possessory title.'" At the same time, toward the end of the Civil War, in March 1865, Congress created the Freedmen's Bureau, which, together with helping ex-slaves in the difficult transition from slavery to freedom, was initially supposed to redistribute among them land confiscated from the slaveholders. Yet, despite these important provisions, no land redistribution occurred after the end of the Civil War, chiefly because the political willingness to act in this sense characterised only a minority of Radical Republican congressmen—among them, notably, Thaddeus Stevens—while the majority wanted a normalisation of the southern economy and society with the ex-slaves occupying the same place in the social hierarchy, despite their newly-won freedom, as mostly landless labourers.[7]

Similarly, in Cuba, as in the United States, the abolition of slavery related to a major conflict—the Ten Years' War (1868–1878)—which developed also as a civil war, since it began as a movement for Cuban independence by the planters in the eastern part of the island against the planters in the western part, who, instead, remained loyal to Spain. First, the rise of the first Spanish Abolitionist Society in 1864, and then the Spanish government's abolition of the Atlantic slave trade in 1867 had done a great deal to erode the planters' power. It was, however, the creation of the first Spanish republic in 1868 that precipitated slavery's fate in Cuba, since it led to the subsequent creation of a movement for Cuban independence and the subsequent division between a *de facto* independent eastern Cuba and a western Cuba still under Spanish control. In the same year, a Creole planter called Carlos Manuel de Cespedes became the leader of the movement for Cuban independence. As he prepared to fight against the Spanish Empire, on 10 October 1868, Carlos Manuel de Cespedes gathered slaves on his sugar plantation, which was located in the eastern part of the island, and he told them that they were now "free" to join the fight for Cuba's independence.[8]

7   Ira Berlin et al. (eds.): The Wartime Genesis of Free Labour, 1861–1865, in: Ira Berlin et al. (eds.): Freedom: A Documentary History of Emancipation, 1861–1867, Series 1, Vol. 2: The Wartime Genesis of Free Labour: The Upper South, New York 1995, p. 175. See also Steven Hahn: "Extravagant Expectations of Freedom:" Rumour, Political Struggle, and the Christmas Insurrection Scare of 1865 in the American South, in: Past & Present 157 (1997), pp. 122–158; and Enrico Dal Lago: "States of Rebellion:" Civil War, Rural Unrest, and the Agrarian Question in the American South and the Italian Mezzogiorno, 1861–1865, in: Comparative Studies in Society and History 47:2 (2005), pp. 403–432. On Thaddeus Stevens and the land issue in the United States South, see Bruce E. Baker/Brian Kelly: Introduction, in: ibid. (eds.): After Slavery: Race, Labor, and Citizenship in the Reconstruction South, Gainesville 2013, pp. 1–3.
8   See Matt D. Childs/Manuel Barcia: Cuba, in: Mark M. Smith/Robert L. Paquette (eds.): The Oxford Handbook of Slavery in the Americas, New York 2010, pp. 90–110. See also Ada Ferrer: Armed Slaves and Anticolonial Insurgency in Late Nineteenth-Century Cuba, in: Christopher L. Brown/Philip D. Morgan (eds.): Arming Slaves: From Classical Times to the

In truth, though, the rebels' objective was to build a new Cuban nation that evened out the differences between eastern and western Cuba by severing the connections with the Spanish Empire, but maintaining the fundamental social structure based on the respect of private property. In 1870, in order to curb the separatist effort, the Spanish government moved toward the abolition of slavery with the Moret Law, which declared free the children born of slave mothers. As in the United States, during the entire period of the war, slaves fled the plantations in large numbers; they ended up joining Cuba's separatist forces. Even though Cuba's revolt was defeated with the end of the war, the Spanish government declared the final abolition of Cuban slavery with the 1880 Patronato Law, which, however, provided for a six-year period of apprenticeship for the ex-slaves as compensation for the slaveholders, and completely ignored the freed slaves' rights to own land. Thus, final abolition occurred only in 1886. By the 1890s, a *colonato* system was in place, according to which freed cane farmers supplied sugar cane for grinding according to the terms of a contract with a central mill. Effectively, this meant that they ended up being landless tenants, much like African Americans in the post-Civil War United States South. Thus, even though the situation of the freed slaves' access to the land differed throughout Cuba, according to a variety of factors, in general terms, according to Rebecca Scott, "most former slaves in Cuba could not acquire sufficient land to become independent farmers."[9]

In comparison with Cuba, in Brazil slavery ended in a relatively peaceful way, even though, similarly to both Cuba and the United States, between 1864 and 1870 the country was engaged in a major conflict—the War with Paraguay. British pressures on the Brazilian government played a major role, and they had already led to the process of abolition of Brazil's Atlantic slave trade, initiated with the 1845 Aberdeen Law and completed with the Eusebio de Queiroz Act of 1850. Equally important was the slaves' continuous unrest in different areas of the empire. Starting from the mid-1860s, Brazil's imperial government enacted a series of acts against slavery, culminating in the 1871 Rio Branco Law. Similarly to the Moret Law in Cuba, the Rio Branco Law in Brazil freed the children born of slave mothers after 1871; however, their owners could either choose to use their services until their twenty-first year of age or accept government compensation. Then, with Joaquim Nabuco's 1880 foundation of the *Sociedade Brasileira Contra a Escravidão* (Brazilian Antislavery Society), the movement for the abolition of

---

Modern Age, New Haven 2006, pp. 304–329; and Rebecca J. Scott: Slave Emancipation in Cuba: The Transition to Free Labor, 1860–1899, Princeton 1985.

9   Rebecca J. Scott: Defining the Boundaries of Freedom in the World of Cane: Cuba, Brazil, and Louisiana after Emancipation, in: American Historical Review 99:1 (1994), p. 87. See also Ada Ferrer: Insurgent Cuba: Race, Nation, and Revolution, 1868–1898, Chapel Hill 1999, pp. 22–31; Ada Ferrer: Cuban Slavery and Atlantic Antislavery, in: Review (Fernand Braudel Center) 31:3 (2008), pp. 267–296; and Christopher Schmidt-Nowara: Empires Against Emancipation: Spain, Brazil, and the Abolition of Slavery, in: Review (Fernand Braudel Center) 31:2 (2008), pp. 101–120.

slavery became widespread. First, starting with Cearà in 1884, different provinces in Brazil took the initiative of abolishing slavery; then, abolitionist organisations sprang up in São Paulo and Rio de Janeiro.[10]

In 1885, Brazil's imperial government passed the Dantas-Saraiva-Cotegipe Law, which freed slaves who were sixty-five years of age. At the same time, from 1886, an increasingly massive number of runaway slaves started to leave plantations and farms. Finally, the imperial government proclaimed the immediate end of slavery, without compensation for slaveholders and throughout Brazil, with the Golden Law of 1888. It was the last official act of emancipation enacted by the government of a major slave-owning society in the Americas. It also created a situation comparable to the fate of ex-slaves in the United States, where the issue of landownership in relation to the emancipated population in the South was largely and deliberately ignored by the Federal Government, since this same issue was deliberately disconnected from the issue of slave emancipation by the Brazilian government. In fact, with regard to landownership, the Brazilian government had already enacted a Land Law in 1850, which prohibited the legalisation of landed property through squatting and stated that land could only be owned legally through purchase. As a result, since the 1850s, freed slaves had been discouraged from owning land, while this provision had been specifically designed to attract much needed European immigrant groups of free labourers. The long term effects of this law, after the end of slavery in 1888, led to a situation in which most freed slaves became landless tenants—similar to African Americans in the United States South. However, in practice, in the words of Jose De Souza Martins, "by lowering the cost of the agrarian workforce through a system very similar to debt peonage, this measure, to some extent, transferred both the hardships of and the economic burden occasioned by the abolition of slavery onto the new worker."[11]

10   Robert W. Slenes: Brazil, in: Mark M. Smith/Robert L. Paquette (eds.): Slavery in the Americas, p. 124. See also Leslie Bethell: The Abolition of the Brazilian Slave Trade: Britain, Brazil, and the Slave Trade Question, 1807–1864, Cambridge 1970; Victor Izeckhson: Slavery and War in the Americas: Race, Citizenship, and State Building in the United States and Brazil, 1861–1870, Charlottesville 2014; and Jeffrey Needell: The Party of Order: The Conservatives, the State, and Slavery in the Brazilian Monarchy, 1831–1871, Stanford 2006.

11   Jose De Souza Martins: Representing the Peasantry? Struggles for/about land, in: Brazil in Journal of Peasant Studies 29:3–4 (2002), p. 302. See also Emilia Viotti da Costa: 1870–1889, in: Leslie Bethell (ed.): Brazil: Empire and Republic, 1822–1930, New York 1989, pp. 161–213; Christopher Schmidt-Nowara: Empires Against Emancipation: Spain, Brazil, and the Abolition of Slavery, pp. 114–115; Herbert S. Klein/Francisco Vidal Luna: Slavery in Brazil, New York 2010, pp. 295–320; Robert Conrad: The Destruction of Brazilian Slavery, 1850–1888, Berkeley 1972; and James Holston: The Misrule of Law: Land and Usurpation in Brazil in Comparative Studies in Society and History 33:4 (1991), pp. 695–725.

Emancipation in Eastern Europe: Ending Serfdom

During the same period, in which the process of abolition of slavery took place in the last slave systems in the Americas, a parallel process leading to the abolition of serfdom occurred in Eastern Europe. By 1860, similarly to the way in which slavery in the New World was restricted mainly to the three large-scale slave societies of the antebellum United States South, Cuba, and Brazil, serfdom was almost exclusively present in Romania and Russia, including Russian Poland, since by then it had been abolished already in the rest of Eastern Europe. Chronologically, the first state to abolish serfdom in Eastern Europe had been Prussia with the October Edict of 1807, which also allowed non-aristocrats to acquire land; it was followed by subsequent, more specific, decrees in 1811 and 1816. Even though the laws, overall, broke the aristocratic control of landed property, they still favoured both the Junker landed nobility and the rich farmers, who managed to acquire large amounts of former common land. Conversely, the largest class of "peasants with meager holdings […] did not attain independence and skidded into the class of landless rural laborers"[12], in the words of James Brophy. It was not until the Revolution of 1848–49 that the process was complete, when the German states abolished all feudal dues; yet, even then, peasants received "freehold right to their farms, in return for making redemption payments to their former lords."[13] A similar process occurred in the Habsburg lands, where the 1781 Patents had abolished personal serfdom in Austria and Bohemia, but had left feudal obligations intact. The final abolition of serfdom and also of feudal dues and obligations occurred only in the wake of the 1848–49 Revolutions, and came into effect in 1849 in Austria and in 1853 in Hungary. Yet, also in these cases, landowners were to be compensated through compulsory peasant work in a process of redemption. Overall, though, the situation of the peasantry in the Habsburg lands after full emancipation varied from place to place, with a larger degree of peasant landownership in Bohemia and the opposite case in Hungary, where "the rural majority had little future except as a class of farm-servants or laborers," according to Robin Okey.[14]

In the 1860s, in a somewhat speedier turn of events than the one that characterised slavery's abolition in the Americas, within the space of five years, serfdom would be entirely eradicated—legally, at least—from the remaining regions of Eastern Europe where it still existed by official governmental decrees. Also, in both cases, the process of abolition of

---

12   James M. Brophy: The End of the Economic Old Order: The Great Transition, 1750–1860, in: Helmut Walser Smith (ed.): The Oxford Handbook of Modern German History, New York 2011, p. 173.

13   Michael L. Bush: Servitude in Modern Times, p. 184.

14   Robin Okey: The Habsburg Monarchy, c. 1765–1918: From Enlightenment to Eclipse, New York 2001, p. 168. See also William Hagen: Ordinary Prussians: Brandenburg Junkers and Villagers, 1500–1840, Cambridge 2002.

serfdom in itself occurred relatively peacefully. This process was thus more similar to the way abolition of slavery occurred in Brazil, rather than to the way in which it occurred in either the United States or Cuba. However, on the one hand, it is important to take into account the impact of widespread and ever increasing peasant unrest—comparable to slave unrest in the Americas—while, on the other hand, despite little direct effect on serfdom, the 1854–56 Crimean War had important indirect repercussions in Eastern Europe as it weakened autocratic governments—first and foremost Russia, whose imperial ambitions were halted—and their institutions, among them the social institution of serf-owning. Also as a result of Russia's defeat in the Crimean War, Russia's protectorate over Wallachia and Moldavia ended and, in 1858, the two regions joined to form the state of Romania, which was formally acknowledged in 1862. In 1864, enlightened prince Alexander John Cuza took power and, after holding a plebiscite, he issued a law that officially ended serfdom in Romania, also temporarily giving peasants the rights to the lands they farmed.[15]

The fact that the Crimean War ended with the defeat of Russia was a major factor in mobilising Russian public opinion against serfdom. In fact, many enlightened members of the Russian elite sympathising with western ideas thought of serfdom as the main obstacle on the road to modernisation. Thus, with the accession of Tsar Alexander II in 1855, serious efforts to create legislation to free serfs produced a material result. Among the several measures enacted during the period called of the "Great Reforms" (1855–1881), there were also experiments conducted in several estates by the Ministry of State Property in the 1850s in order to ascertain—as, effectively, the final results did—that hired labour was comparatively more efficient and more suited to the needs of the agriculture of a modern nation than *corvée* labour.[16] Therefore, as part of the "Great Reforms" enacted by the Tsarist regime, serf emancipation fitted into a wide-ranging programme of modernisation of government policies, which, under Alexander II, aimed at "enhancing nation-building" through "both ethnic and civic homogenization of the empire"[17], in the words of Vera Tolz. From a comparative perspective, it is useful to notice that, if this was the case, then, the Tsarist government's overall purpose, at least in theory, might have shared important features with the United States Republican government's programme

15 Michael L. Bush: Servitude in Modern Times, pp. 184–185. See also Carl Levy: Lords and Peasants, in: Stefan Berger (ed.): A Companion to Nineteenth-Century Europe, Oxford 2009, pp. 70–85; and Jerome Blum: The End of the Old Order in Europe, Princeton 1978.

16 Boris N. Mironov: When and Why was the Russian Peasantry Emancipated?, in: Michael L. Bush (ed.): Serfdom and Slavery: Studies in Legal Bondage, pp. 323–347; and Gregory L. Freeze: Reform and Counter Reform 1855–1890, in: Gregory L. Freeze (ed.), Russia: A History. New York 2009, pp. 198–232. See also David Field: The End of Serfdom: Nobility and Bureaucracy in Russia, 1855–1861, Cambridge 1976.

17 Vera Tolz: Russia: Empire or Nation-State in the Making?, in: Timothy Bancroft and Mark Hewitson (eds.): What is a Nation? Europe, 1789–1914, New York 2006, p. 307.

of nation-building through slave emancipation and extension of civil rights to African Americans between the Civil War and Reconstruction, even keeping into account the differences between the two cases. Yet, it is important to point out that, in comparison with the rest of the Americas, the United States case of the revolutionary legislation on African American rights enacted during Radical Reconstruction, as we shall see later, stands out as a unique phenomenon—a point made specifically by comparative historians such as Peter Kolchin and Steven Hahn. This development, in turn, provides a dramatic contrast with the subsequent backlash against African American rights that eventually led to racial segregation in the United States South—a development, which, conversely, had much more in common with the fate of ex-slaves of African descent in both Cuba and Brazil, who never went through an equivalent experience to Radical Reconstruction, and who did not achieve integration until the middle of the twentieth century.[18]

Chronologically, serf emancipation in Russia also occurred closer to slave emancipation in the United States than in the rest of the Americas. In fact, in Russia, Tsar Alexander II promulgated the law that abolished serfdom on 19 February 1861, freeing at once more than twenty million bondsmen—the largest population of unfree labourers in the world at the time. Unlike most other official decrees that sanctioned the end of unfree labour, the Tsar's 1861 act was extremely long and immensely complicated, also as a result of years of debate at the Tsar's court between different views on how to best proceed toward the goal of emancipation of the Russian peasantry. In short, the legislation created new officials called Peace Mediators, who were appointed by the provincial governors, and who, even though noblemen or serf-owners themselves, were to help peasants in their transition from serfdom to freedom—similar to the Freedmen's Bureau agents in the United States South. In turn, a number of different agencies were in charge of supervising the Peace Mediators, thus adding a series of bureaucratic layers to the process of emancipation, while at the same time allowing noblemen to maintain their power and authority over peasants, since the agencies exclusively comprised noblemen in their ranks.[19] In practice, according to the Tsar's document, the transition from serfdom to freedom was to be gradual, rather

18   See Steven Hahn: Class and State in Postemancipation Societies: Southern Planters in Comparative Perspective, pp. 75–98; and Peter Kolchin: Reexamining Southern Emancipation in Comparative Perspective, pp. 7–40.

19   See Peter Kolchin: After Serfdom: Russian Emancipation in Comparative Perspective, in: Stanley L. Engerman (ed.): Terms of Labor: Slavery, Serfdom, and Free Labor, Stanford 1999, pp. 88–95. See also Peter Kolchin: Some Controversial Questions, pp. 42–68; Boris N. Mironov: When and Why Was the Russian Peasantry Emancipated?, in: Michael L. Bush (ed.): Serfdom and Slavery: Studies in Legal Bondage, pp. 323–347; and David Moon: The Abolition of Serfdom in Russia, 1762–1902, Harlow 2001.

than sudden. As Peter Kolchin has remarked, "serfs received their 'personal freedom' at once […] but they remained under the 'estate police and guardianship' of their former owners", to whom they continued to owe services and pay obligations.[20]

Traditionally, Russian serfs were to either pay their owners obligations in kind (*obrok*) in arbitrarily set amounts, or else they had to perform *corvèe* labour (*barshchina*) three to five days a week. In truth, Russian serfs preferred the *obrok* over the *barshchina,* because the latter required them to perform labour under the strict supervision of the owner, his administrator, or his overseer. Regardless of the difference between *obrok* and *barshchina,* though, even after the release of the Tsar's emancipation decree, Russian peasants continued to owe their former owners both payment obligations in kind or in cash and *corvèe* labour; thus, similarly to most ex-slave populations in the Americas, they were hardly free in the full sense of the term. Within two years from the 1861 decree, the landlords were to draw charters detailing the nature of obligations of their ex-serfs' and the extent of the land allotments that were given to them. The Peace Mediators were to verify the charters together with representatives among the peasants, and—where required— add the necessary changes to them before their actual implementation, which more often than not went ahead even without the peasants' approval.[21]

At the end of the two years, then, house servants were free, but with no land. Instead, all other ex-serfs could become free from their temporary obligations only by paying for their land allotments through variable terms of *corvée* labour for their owners, at the end of which they would become proprietors, in a process called "redemption", as in all other emancipation schemes enacted in Eastern Europe. This process occurred in two stages: in the first stage, redemption exclusively regarded the plots of land attached to the serfs' houses (farmsteads) immediately following the implementation of the charter; conversely, in the second stage, redemption regarded the communal field land and took many years, in most cases until the twentieth century, to complete. In fact, in the charters that detailed the peasants' obligations and the extent of land allotments, peasant property rights were defined always as "communal allotment land", with a specific reference to the peasant community, rather to individuals or individual households; as a consequence, as Steven Nafziger has pointed out, "the property rights of individual households were heavily circumscribed on such land." Moreover, according to Gregory Freeze, "the emancipation

20   Peter Kolchin: After Serfdom: Russian Emancipation in Comparative Perspective, p. 92. See also Jerome Blum: Lord and Peasant in Russia: From the Ninth to the Nineteenth Century, Princeton 1971, pp. 394–395.

21   See Richard L. Rudolph: Agricultural Structure and Proto-Industrialization in Russia: Economic Development with Unfree Labor, in: Journal of Economic History 45:1 (1985), pp. 47–69; and Enrico Dal Lago: Second Slavery, Second Serfdom, and Beyond: The Atlantic Plantation System and the Eastern and Southern European Landed Estate System in Comparative Perspective, 1800–1860, in: Review (Fernand Braudel Center) 32:4 (2009), pp. 391–420.

settlement had special provisions to ensure that the nobility retained at least a minimum part of their estate"; thus, "as a result of 'emancipation', peasants suffered a loss of land that they had utilized before emancipation."[22]

Shortly after the enactment of serf emancipation in Russia, following the January Rising of 1863–64 in the Russian-controlled area of Poland, the Tsar extended the abolition of serfdom to include the Congress Kingdom of Poland by 1864. As with Russian ex-serfs, the emancipated peasants in the Congress Kingdom of Poland did not gain as much as they had expected from the reforms abolishing serfdom, since the majority of the land remained in the hands of established landowners and nobles, or else it was acquired by a small number of wealthy peasant proprietors. The majority of peasants, however, could not afford to purchase land, as was also the case with serf emancipation in Prussia and the Habsburg lands. As a result, according to Norman Davies, "over the next sixty years [...] the number of landless peasants quadrupled", while "the material conditions of the peasantry did not improve dramatically", since "freedom did not necessarily engender prosperity."[23] Thus, overall, as with most ex-slaves in the Americas, also most ex-serfs in Poland and in Russia saw their initial aspirations to have some degree of control over the land they had worked as unfree labourers frustrated, at least in terms of purchasing and owning individual plots of land and guaranteeing a certain degree of economic independence for themselves and their families.

Emancipation, Post-Emancipation, and Land Rights in Comparative Perspective

Comparison between the two concurrent processes of abolition of unfree labour in the Americas and Eastern Europe shows that, specifically, slave emancipation in the United States shares only a few characteristics with both, while it has, for the most part, unique features. The main similar characteristic is the fact that, even though recent scholarship

---

22   Steven Nafziger: Russian Serfdom, Emancipation, and Land Inequality: New Evidence, Working Paper, Department of Economics, Williams College, 2013, p. 17; Gregory L. Freeze: Reform and Counter Reform 1855–1890, p. 207. See also Peter Kolchin: After Serfdom: Russian Emancipation in Comparative Perspective, pp. 93–95; and Peter Kolchin: Some Thoughts on Emancipation in Comparative Perspective: Russia and the United States South in Slavery & Abolition 11:4 (1990), pp. 357–363. For interesting comparative points, see Peter Kolchin: A Sphinx on the American Land: The Nineteenth-Century South in Comparative Perspective, Baton Rouge 2003, pp. 94–98; and Steven Hahn: Class and State in Postemancipation Societies: Southern Planters in Comparative Perspective, pp. 80–81.
23   Norman Davies: God's Playground: A History of Poland, Vol. II: 1795 to the Present, New York 2005, pp. 138–139.

has justly placed much greater emphasis on the slaves' agency in the United States process of emancipation—as also in the case of Brazil and Cuba—the actual document that decreed the end of slavery in the United States South was a proclamation released by the official national government. This is true of all the cases of abolition of slavery apart from Haiti, and also of the abolition of serfdom. Yet, the United States Emancipation Proclamation of 1863 appears completely different in content from all the other decrees emancipating either slaves or serfs because of two particular reasons:

1. it freed the slaves through a war measure, both immediately and permanently; and
2. it provided no compensation—be it in the form of labour, land, or otherwise—for slaveholders.

Conversely, the other emancipation decrees—including those emancipating serfs—always gave guidelines for a process of gradual emancipation whose main purpose was to provide some form of compensation for the former owners of unfree labourers, given that slaves were considered a legitimate form of property.[24]

As Stanley Engerman has shown in the case of slave emancipation, gradual schemes almost always involved a transitional period of unpaid labour, called apprenticeship, before ex-slaves could achieve full freedom. This period of apprenticeship functioned as compensation for ex-slaveholders, sometimes combined with a postponement of the actual date of emancipation to the next generation, as in the case of the so-called free-womb laws. Even in the case of Brazil, where the 1888 Golden Law provided for immediate slave emancipation, apparently with no compensation for slaveholders, a system similar to apprenticeship, called *parceria,* characterised the early period of free immigrant labour that replaced slavery. This, effectively, acted as a form compensation for former owners of enslaved labourers. Conversely, in Stanley Engerman's words, "in no case of slave emancipation, immediate or gradual, were the slaves offered any compensation"[25], least of all the immediate access and possibility of acquiring the land they had toiled on, which, similarly to the case of ex-serfs in Russia, became available to them only as a result of a very long-term process, if at all. Yet, leaving aside the land issue and focussing instead on the emancipation process itself, when seen in comparative perspective and in a wider Euro-American framework, the 1863 United States Emancipation Proclamation does appear truly exceptionally significant because of the uniqueness of its radical provisions.

24 See Peter Kolchin: Reexamining Southern Emancipation in Comparative Perspective, pp. 16–17.
25 Stanley L. Engerman: Emancipation Schemes: Different Ways of Ending Slavery, in: Enrico Dal Lago/Constantina Katsari (eds.): Slave Systems: Ancient and Modern, New York 2008, p. 273. For further comparative points, see Enrico Dal Lago: American Slavery, Atlantic Slavery, and Beyond: The U.S. "Peculiar Institution" in International Perspective, pp. 156–164.

As a consequence, also uniquely within the Euro-American world, the revolutionary dimension of United States slave emancipation led to subsequent revolutionary transformations in the concept of national citizenship during Radical Reconstruction, when the Radical Republicans who dominated Congress and national politics redefined that concept, first through the official sanction of the end of "national" slavery in the United States with the passing of the Thirteenth Amendment (1865), and then through the drafting of specific legislation that protected civil rights for the newly-freed African American population.

Yet, with regard to the land issue, as Eric Foner has remarked, "when it came to the former slaves' quest for land […] Reconstruction governments took few concrete actions."[26] In fact, as Steven Hahn has shown, freed African Americans had somewhat unrealistic expectations about the United States federal government's attitude on the land issue. By December 1865, these expectations had coalesced around rumours that there would be a general redistribution of land on Christmas of that year among ex-slaves, who believed they were entitled to receive compensation in the form of "forty acres and a mule"[27]; these rumours, in turn, led to widespread fears among whites of a general insurrection of the African American population. In the end, however, neither land redistribution nor the ex-slave insurrection occurred on Christmas 1865, and, although the land issue was still raised a few times by Radical Republicans, it never became a part of the agenda of Reconstruction. As a result, the Reconstruction governments missed the opportunity to secure the legal freedom of ex slaves with legislation that facilitated their transition toward economic independence and thus prevented the creation of a strong African American landed peasantry, as famously pointed out in his analysis by W.E.B. Du Bois.[28]

As a result, unable to own land, most African American families rented it from planters through a system of sharecropping that perpetuated their dependent status through highly exploitative contractual arrangements. African American tenants not only were forced to share their crop with the landowners, but also they had no choice but to become dependent on rural merchants who loaned them supplies, ending up in a cycle of debt and poverty, which, effectively, tied them to the land they worked on almost as much as slavery had tied them to the slaveholders in the past. Eventually, this loss of economic power by ex-slaves also led to a gradual loss of civil rights and increasing

---

26   Eric Foner: Forever Free: The Story of Emancipation and Reconstruction, New York 2005, p. 202.

27   Steven Hahn: "Extravagant Expectations of Freedom": Rumour, Political Struggle, and the Christmas Insurrection Scare of 1865 in the American South, pp. 122–158.

28   William E.B. Du Bois: Black Reconstruction in America, 1860–1880: Toward a History of the Part which Black Folk Played in the Attempt to Reconstruct Democracy, in: America, 1860–1880, Boston 1935. See also Eric Foner: Reconstruction: America's Unfinished Revolution, 1863–1877, New York 1988; and Bruce E. Baker/Brian Kelly: Introduction, pp. 1–15.

racial discrimination against African Americans in the later quarter of the nineteenth century. Yet, this development in the United States South was far from being unique. In fact, a common negative feature throughout the Americas was the chronically small amount of land owned by ex-slaves and their descendants. Such a situation, in turn, might prove conducive to major uprisings, as in the case of the 1865 Morant Bay Rebellion in Jamaica. Ultimately, in all the post-emancipation societies, this led to the perpetuation of a social order at whose bottom continued to be the free persons of colour, even after the proclamation of the republic in Brazil in 1889 and the end of Spanish colonial rule in Cuba in 1898. At the same time, though, following Jeffrey Kerr-Ritchie, we can also say that there is no doubt that, during the nineteenth century, the conditions of black landownership varied from place to place, and that, therefore, compared to other regions of the Americas, black landholding was less prevalent particularly "in Puerto Rico, central Cuba, Barbados, Antigua, and much of the United States South." Yet, still following Jeffrey Kerr-Ritchie, as a general point, it is an "undeniable fact that most ex-slaves in the nineteenth-century Americas became rural proletarians because they were denied fair and legal access to landownership."[29]

Interestingly, a comparative study of the long end of slavery in the Atlantic world with the long end of serfdom in Eastern Europe shows clearly that neither process effectively caused a sudden end to the power of the agrarian elites, especially considering that Europe's emancipated serfs, similarly to emancipated slaves in the Americas, struggled to become landed proprietors. Thus, in Russia, the process of "redemption" initiated by the 1861 laws on serf emancipation allowed former serfs to become free from obligations, but only once they were able to purchase the land they worked on, by working additional years for their ex owners. Therefore, similarly to most other situations of transition from unfree labour to freedom—and in contrast with the 1863 slave emancipation in the United States and also the 1888 slave emancipation in Brazil—in Russia, former unfree labourers were still bound by law to provide additional coerced work for a number of years as a form of compensation to their ex owners. Thus, in Russia's case, after serf emancipation, the set of obligations of *corvèe* labour and payment either in kind or in cash traditionally owed to the landowners functioned in a similar way to the systems of apprenticeship studied by Stanley Engerman with regard to the slave systems in the Americas.[30]

29   Jeffrey R. Kerr-Ritchie: Freedom's Seekers: Essays on Comparative Emancipation, Baton Rouge 2014, p. 141, p. 134. See also Eric Foner: Nothing But Freedom: Emancipation and its Legacy, Baton Rouge 1983; and Michael W. Fitzgerald: Splendid Failure: Postwar Reconstruction in the American South, Boston 2007.

30   For comparisons in this sense, see Michael L. Bush: Servitude in Modern Times, pp. 177–199; and Peter Kolchin: Comparative Perspectives on Emancipation in the U.S. South: Reconstruction, Radicalism, and Russia,, pp. 203–232.

Equally interesting, in comparative perspective, is the fact that, similarly to ex-slaves in the United States, ex-serfs in Russia also had unrealistic expectations about the government's implementation of the process of emancipation. In the Russian case, though, the ex-serfs' expectations were a result of an almost messianic belief that the Tsar had a genuine intention to deliver them through a simple and straightforward act of emancipation. Consequently, when the actual 1861 emancipation act appeared confusing and contradictory and hardly promising immediate deliverance, ex-serfs became disillusioned with what they considered "a fraudulent emancipation settlement"[31] and engaged in acts of resistance that provoked a large wave of rural unrest in the Russian countryside for most of the summer of that year. The ex-serfs' sense of disillusionment was compounded by their inability to have immediate access to, and to purchase individually, the field land on which they were still forced to work. Still, despite this, their conditions were changing for the better, although very slowly. According to Peter Kolchin, it took twenty years for the majority of Russian peasants to become proprietors; thus, by 1881, as many as four-fifths of Russia's ex-serfs owned land. This was in marked contrast with what happened to ex-slaves throughout the Americas, who, at that same date, were still mostly landless labourers.[32]

Conclusion

Ultimately, a Euro-American perspective on post-emancipation societies—first and foremost the United States South between the American Civil War and Reconstruction—allows us to better understand, despite the many differences, how all the processes of transition to "free" labour, and their aftermaths, left the agrarian elites of different countries still largely in control and able to retain their power. In turn, this allowed them to keep the rural labourers in a condition of economic dependency and social subordination, mainly as a consequence of the widespread lack of landownership among most of the former bondsmen turned peasants, or, rather, peasant proletarians—a phenomenon that, in the later part of the nineteenth century, equally characterised ex-slaves in the Atlantic world and ex-serfs in Eastern Europe. In Peter Kolchin's words, "in both central Europe and much of the New World, emancipation often meant that freedpeople lost access to—or were forced to pay for—land allotments that they already regarded as their own, and in

31   Peter Kolchin: *After Serfdom: Russian Emancipation in Comparative Perspective*, p. 109.

32   See also Peter Kolchin: *Comparative Perspectives on Emancipation in the U.S. South: Reconstruction, Radicalism, and Russia*, pp. 203–232. For a different comparative approach, but still focusing on land rights, see Enrico Dal Lago: *States of Rebellion: Civil War, Rural Unrest, and the Agrarian Question in the American South and the Italian Mezzogiorno, 1861–1865*, pp. 403–432.

most countries the legal rights of the freedpeople were severely restricted."[33] Thus, loss of control over the land, and resulting failure to achieve a degree of economic independence, led, for most emancipated American slaves and European serfs, to the continuation of a state of subjection, and ultimately to an erosion of their civil rights—a situation against which they resisted in different ways and to different degrees, but one that continued, nonetheless, in both cases until the twentieth century.

Enrico Dal Lago teaches American History at the National University of Ireland, Galway. He researches on comparative slavery, abolitionism, and nation-building. He is the author of *American Slavery, Atlantic Slavery, and Beyond: The U.S. "Peculiar Institution" in International Perspective* (London, 2012); *William Lloyd Garrison and Giuseppe Mazzini: Abolition, Democracy, and Radical Reform* (Baton Rouge, 2013); and *The Age of Lincoln and Cavour: Comparative Perspectives on Nineteenth-Century American and Italian Nation-Building* (New York, 2015).

33   See Peter Kolchin: Reexamining Southern Emancipation in Comparative Perspective, p. 25.