Review Essay

The Comparative Politics of Immigration

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Rafaela M. Dancygier, *Immigration and Conflict in Europe*, New York, Cambridge University Press, 2010.

Marc Morjé Howard, *The Politics of Citizenship in Europe*, New York, Cambridge University Press, 2009.

Thomas Janoski, *The Ironies of Citizenship: Naturalization and Integration in Industrialized Countries*, New York, Cambridge University Press, 2010.

Anthony M. Messina, *The Logics and Politics of Post-WWII Migration to Western Europe*, New York, Cambridge University Press, 2007.

Until recently, most social scientists with an interest in immigration were economists who specialized in labor economics and sociologists who focused on immigrant and ethnic communities. Prior to the 1980s, few political scientists had a scholarly interest in immigration, and most who did, at least in the United States, were specialists in urban and local politics. In Europe there was a similar lack of interest. The first political scientist to write her dissertation on the politics of immigration at the Institute of Political Science in Paris could not find an advisor who knew anything about the subject.[1] Comparative research was even rarer. For comparativists interested in social and political conflict, for example, socioeconomic class generally trumped immigration as a basis of analysis in Europe, while in the United States studies of ethnic conflict dominated. After about 1990, however, as immigration questions became politicized in Western Europe, scholarly interest began to increase. In this journal, during the twenty-year period from 1970–1990, fourteen articles alluded to questions of immigration in an important way; during the following decade, there were twenty-seven.

Among the earlier discussions of the political importance of immigration in Western Europe, with the exception of Mark Miller,[2] few scholars saw immigrants as political

actors, or potential political actors, in the sense that Kristi Andersen analyzed immigrants in the United States at the time of the New Deal.[3] Discussions of the challenges of class and class conflict often called into question the durability of stable democracy and regime stability, while the challenge of immigration was analyzed more often in terms of social tensions and policy problems.

Seymour Martin Lipset's landmark volume, *Political Man*, first published in 1959, was one of the earliest studies of stable democracy to compare Europe and the United States.[4] A key concern throughout were the questions of how groups were integrated into a larger society and how integration related to loyalty to the political system. For Lipset and many other social scientists concerned with problems of democratic development, democratic stability was directly related to the integration of an alienated working class. The movement of the working class toward full citizenship, both political (in terms of voting) and social, was a means of integration and the development of democratic regime stability. It is striking that in the literature of this period, while considerable attention was devoted to social, economic, and political integration and to the impact on political behavior and political stability, virtually no attention was given to immigrants and immigration at a time when immigration in such (then) "unstable" democracies as France and Germany was high and growing rapidly.

In France immigrants constituted almost 5 percent of the population at the time Lipset's book appeared, and increased to almost 7 percent over the next twenty years. In Germany non-German immigrants amounted to just over 1 percent of the population in 1960 (about 700,000), but increased to almost 7 percent of the population over the next decade. In addition, by the time the recruitment of non-German immigrants (technically "guest workers" who were under contract) commenced, more than 15 million ethnic Germans had already moved either from East Germany or countries further to the east into the territory of the Federal Republic of Germany, and constituted about a quarter of the population. Thus, in Europe the potential political consequences of cleavages between immigrants and natives went largely unrecognized, while in the United States immigration had slowed to a trickle by the 1960s, although the concept of "ethnicity" had become well established during the pre-WWII period. Race, of course, was another matter for the United States, to which Lipset also gave relatively little attention.[5]

During the past decade, scholarship on the politics of immigration has increased impressively among political scientists; and among comparativists first-rate scholarship in this area is no longer marginal. At the 2012 conference of the Council of European Studies, there was standing room only at the meeting of the immigrant studies group, and more panels were organized around immigration questions than any other subject. A second (and third) generation of scholars in this burgeoning subfield of comparative politics is building creatively on work first begun twenty-five to thirty years ago.

Scholarly work on the politics of immigration has tended to focus on several important questions, among which three tend to dominate. The first concerns state capacity, that is, whether liberal democratic states are capable of effectively regulating

the flow of immigration, as well as managing the social and political consequences of immigrant settlement. James Hollifield first analyzed the limits on immigrant regulation imposed on (or accepted by) liberal democracies more than twenty years ago,[6] but the importance of these limits has been challenged in a lively and ongoing debate.[7]

The second question relates to citizenship and integration and to changes in citizenship policies with regard to immigrants. What accounts for differences in citizenship laws and naturalization procedures among countries of comparable levels of development? This question has been approached historically, in terms of state development, by Rogers Brubaker.[8] Although Brubaker's historical argument has not been directly challenged, more recent studies argue that evolving citizenship law has been more responsive to the politics of immigration than to historical tradition.[9]

Moreover, questions of citizenship have been linked to a much broader scholarly debate on immigrant integration, which in turn has been related to models of integration. Since the 1980s, an extensive literature in sociology and political science has grown around the idea of models of integration, an approach that focuses on sharp contrasts among historical, political, philosophical, social, and cultural drivers of integration policies in different national settings. This approach suggests mutually exclusive "public philosophies," such as French republicanism, British and American multiculturalism, liberal (Dutch) multiculturalism, and German (ethno-) nationalism. At their limit, they are developed as policy paradigms that suggest a strong coherence among different aspects of policy linked to one dominant conception of the rationale behind a policy. The models also suggest a path dependency over time that hinders any prospect of transformation, as well as definition of integration policy objectives, citizenship rules, and the categories related to the population conceived as the target of integration policies.

Although this approach has endured as scholarly shorthand, it has been challenged primarily because of the growing gap between empirical reality and the assumptions drawn from these models.[10] While normative models and public philosophies generally function as guideposts and tools for developing policy, even the normative aspects of national models have been increasingly undermined by policy rationales for the orientations and implementation of integration policies that seem to contradict the assumptions of these models.[11] At the core of this scholarly debate is not simply the question of the dynamics of policy, but what explains policy change.

The third focus of scholars is the relationship between immigration and changing patterns of conflict in politics and society. There is now a growing literature on the emergence and development of radical right parties in Europe, and considerable debate on how this relates to immigration, or rather to the politicization of issues of immigration. Scholars are preoccupied with the question why voters have shifted their allegiance to radical right parties during the past twenty-five years. Although reaction to immigration has been an important motivation for this political shift, scholars also point to broader socioeconomic conditions have provided a window of opportunity for radical right success and the political opportunity structures that have provided space for the electoral success of the radical right.[12] While most of this literature examines the

electoral development of radical right parties as a dependent variable, some scholars also focus on these parties as independent variables, as actors that have framed issues of immigration, mobilized anti-immigrant sentiment, and altered patterns of conflict within the political system.[13]

Finally, a small but growing group of scholars examines immigrant-native conflict and immigrant-state conflict as patterns that have become part of domestic politics in some European countries.[14] For the most part, these studies directly or indirectly derive from the vast literature on ethnic and racial conflict in the United States. They also focus, however, on a comparative problem. For studies of radical right parties, as well as immigrant-native conflict, the challenge has been to explain why these phenomena have emerged in some countries but not in others, and in some localities but not others. The answers to these questions are not easy, and scholars have wrestled with them for many years.

Each of the books analyzed in this review makes an important contribution to discussions of these questions. They either attempt to deal with questions at the core of the literature or pose new ones. The authors synthesize and build on the literature that has evolved over the past two decades. Perhaps most important, each takes a comparative approach to the politics of immigration. Anthony Messina's book, *The Logics and Politics of Post-WWII Migration to Western Europe*, confirms the significant impact of post-war immigration on the societies and politics of European countries, but he focuses on explaining why (and how) migration policies remained relatively open in the face of growing public opposition and a surge of support for anti-immigrant political parties. Rafaela M. Dancygier's book, *Immigration and Conflict in Europe,* is the most comprehensive study of variations of immigrant conflict among different immigrant groups, across localities and cross nationally. Marc Morjé Howard's study, *The Politics of Citizenship in Europe*, examines two questions about citizenship policy that have concerned social scientists for several generations, that is, how to account for differences in policy among countries at similar levels of development, and how to account for changes in well-established policies over time. Finally, Thomas Janoski, in *Ironies of Citizenship: Naturalization and Integration in Industrialized Countries*, uses Howard's study as a critical starting point, providing a different take on naturalization policy and naturalization rates by separating them from theories of immigration and relating naturalization to the historic relations with immigrant populations by colonizing, noncolonizing, and settler countries.

Messina's important book is the most comprehensive of these four studies. He focuses on two questions, to which scholars have given a variety of answers. The first deals with the issue of state capacity. "To what degree can contemporary governments and states effectively regulate immigration flows and manage the social and political fallout that immigration inevitably precipitates in the domestic setting?" (p. 6). By relating policy to political process, Messina argues that policy is interest driven and well within the control of sovereign state actors.

The first question leads to the second. "Why have the major immigrant-receiving states of Western Europe historically permitted and often abetted relatively high levels

of immigration?" Messina argues that immigration was initially labor market driven, that European planners either recruited workers from their former or present colonies or, in the absence of colonial labor, developed guest worker programs. Thus, in this mindless or market way, workers were recruited from Muslim countries in North Africa and Turkey and eventually settled in Western Europe. Although Messina notes that few policymakers were concerned about the long-term economic, social, or political consequences of this wave of immigration when it commenced in the 1950s (p. 2), and most assumed that many if not most of these immigrant workers would return home in the event of an economic downturn, the first wave of immigration was both segmented and discriminating.

The periods of entry of immigrants into European countries varied considerably, and the moment at which governments chose to reverse policy also varied. Moreover, although entry may have been labor market driven in a broad sense, Messina demonstrates that governments discriminated among sources in a very specific way. "Each of the major labor-importing states cultivated and often politically managed its own nearly exclusive stream of immigrant workers, tapping some sources of foreign labor while neglecting or discriminating against others" (p. 25). In this sense, recruitment, though market driven, was not a random process and was effectively shaped by policymakers.

However, the choices of policymakers were constrained by the availability of surplus labor. Messina argues that labor recruitment from friendly and familiar labor-exporting sources (generally former colonies) seemed rational at the time, and that these foreign workers were seen as relatively easy to absorb socially because "they were predisposed to identify psychologically or culturally with the host society" (p. 48). The problem was that these immigrants would be the least likely to leave, and the most apt to opt for permanent settlement, establishing the first link in an expanding chain of economic and noneconomic migration to Western Europe.

This important insight may, however, go too far. No European government sought immigration from Muslim countries (most of them former colonies), but, at least up to a point, most felt that immigrant workers were necessary for economic growth. Only when the economies of European labor-exporting countries began to grow in the 1960s (and when their fertility rates began to drop) did Europe reluctantly accept or seek immigrants from its former colonies. In France, for example, the largest number of foreign residents until the beginning of the twenty-first century was from Portugal, not Algeria. Recent figures indicate that about a third of the foreign population is now from North Africa, and this proportion is steady, not growing.

Similarly, the Irish were the largest single immigrant group in the UK after the war, and other Europeans (including refugees from the DDR) were sought by German planners during the height of German reconstruction. The arrival in Britain in 1948 of the first large contingent of Jamaican workers (who arrived as British subjects) provoked the first serious questioning of empire/commonwealth citizenship that resulted in the redefinition of that citizenship in 1962.

Messina presents the arguments for and against the importance and desirability of immigrant labor for West European economies after the war, and their conclusions come

out on opposite sides of the issue (on balance, Messina supports the net benefits for domestic economies of Western Europe) (p. 23). However, regardless of the *post-hoc* analyses, few policymakers questioned the importance of immigration for the economy at the time.

The economic downturn arrived in the early 1970s, and efforts to halt the first wave were directly related to a second wave of dependents. In this way, populations of what were often thought of as temporary immigrant workers were transformed into permanent immigrant settlers. The second wave, consisting primarily of family migration, or family unification, was a logical outgrowth of the first wave. Immigrants gained access by right of citizenship if they came from former colonies, and then by rights that were expanded by court decisions. In a number of important immigration countries (Belgium, the UK, the Netherlands, and France), a large proportion of the resident first-wave immigrant population were full citizens, and therefore also had a right to reside and to bring their families. Although the courts firmly established a limited right to family unification, however, these decisions facilitated, but did not assure, increased family immigration. Messina is particularly good at confronting the argument that continuing immigration was due to a sense of "moral duty" by Western European governments. In fact, since the late 1970s, keeping the door open has been at the core of politico-legal struggle, in which governments were generally on the side of closing the door as much as constitutionally and legally possible.

Messina also presents a coherent case for understanding the third wave of immigration as systemically related to the first two waves. As legal entry became more difficult for both workers and dependents, immigrants have chosen irregular routes of entry into Europe. As Messina points out, there is abundant evidence that illegal immigration is demand driven in Europe, just as it is in the United States. This raises an interesting question that is more difficult to answer. Why is the rate of illegal immigration, as well as the resident population of illegal immigrants, so much lower in Europe (less than 1 percent of the population) than in the United States (about 4 percent)? Some analysts argue that the difference can be explained by the relative openness of the U.S. labor market (which also explains some variation within Europe). However, Messina's emphasis on the inverse relationship between the ease of legal entry and the rate of illegal entry would seem to indicate that illegal entry should be lower, not higher, in the United States where legal entry is far easier than in Europe.

The third wave also consists of asylum seekers. In theory, the rate of asylum seeking should be related to wars, civil conflicts, and state oppression. However, Messina makes the convincing empirical case that asylum is also related to previous patterns of chain migration, demonstrating that asylum seekers are not distributed randomly across Europe, but that the largest proportion in each major European country is from most of the same countries responsible for the first two waves. Therefore, patterns of post-war immigration can be seen as a coherent phenomenon, shaped by public policy, but also by labor market and chain migration patterns.

Thus far we have been looking at immigration as a dependent variable, but many of the concerns have been related to immigration as an independent variable, to the impact

that immigrants and immigration have had on the political systems, as well as the implications for state sovereignty. The massive population change that has resulted from three waves of immigration also implies changes in the political system, and Messina impressively outlines the current dilemma. On one hand, within the political systems of many European countries, immigrant populations have become objects to which voters have reacted. Radical right political parties have achieved an electoral breakthrough in many countries, and there seems to be little doubt of the relationship between immigration and this breakthrough since the 1980s. What is that relationship, and why it has it been different in each country? On the other hand, post-war immigrant populations are now into their third generation, which implies that they are not only objects of politics, but increasingly actors as voters and citizens. Yet, these immigrants (as they are still called) seem to be most visible as objects of politics in the electoral system. Messina synthesizes the now considerable literature on this puzzle, and draws out a number of original conclusions.

The political backlash against immigrant populations, he notes, is less a reaction to immigration (the first wave) than against settlement after 1980 (the second and third waves) and its impact on the sociocultural environment (p. 77). By the time the reaction really began to gain momentum, immigrants were no longer immigrants, but settled populations and increasingly citizens. The variance of reaction in European countries is less related to the objective size of the immigrant populations than to the subjective reactions of voters and how those reactions were framed and shaped by the political party system.

Messina cuts through the complex conclusions of a great deal of research on the political breakthrough of the radical right first by focusing on the role of established political parties in diminishing or exacerbating perceptions of threat among voters. The challenge of anti-immigrant parties lies in their relative success in framing objective conditions such as unemployment and security in terms of immigration. The electoral success of the radical right, he argues, is directly linked to its ability to set the political agenda. Thus, while the radical right maintains a presence throughout Europe, its electoral success is varied and constrained by the political conditions within which it operates. Logically, one of these constraints should be the growing influence of the electoral weight of voters of immigrant origin. Messina presents evidence of the growing importance of immigrant (ethnic) voters, particularly at the local level, but this importance (measured by representation) varies considerably. It appears to be more relevant in Britain and the Netherlands, for example, than in France. At the national level, however, representation is spotty, and only in the Netherlands is minority representation significant. More important, although Messina makes a convincing case for the strong connection of ethnic voting with political parties of the left, his argument that "across countries, [the parties of the left] are conspicuously the parties *for* immigrant voters" is less convincing, and based mostly on evidence from the British Labour Party (p. 207).

Representatives of the left are certainly more sympathetic to immigrants than their counterparts on the right, and parties of the left, generally speaking, have been more likely than parties of the right to support legislation favorable to immigration and immigrant populations. However, their record has been mixed, to say the least. The

British Labour Party did indeed propose and support various race relations acts but, at the same time, proposed increasingly severe restrictions on New Commonwealth immigration after 1962. The French Socialist Party, when in power, was modestly more favorable to the interests of immigrants than governments of the right. Nevertheless, socialist governments also placed more severe limitations on family unification, expelled undocumented immigrants on charter flights, and established detention centers.

The question, then, is why are ethnic minorities that are emerging from immigration so marginalized politically? One answer proposed by Messina is that they are underrepresented, and they are underrepresented because they are badly organized. We can, of course, turn this around and examine the question from the point of view of political parties. Some evidence suggests that for local parties of the left in Britain and (especially) France there is little marginal advantage in the incorporation of minority candidates, and considerable resistance from local established leaders.[15]

There is also the problem of the native working class vote for parties of the left. Where radical right parties are powerful (France), they are generally the most important working class parties, undermining the traditional support for the left; even when their presence is less significant (Britain), working class voters are often less supportive of minority candidacies and policies favorable to ethnic minorities. Thus, while emerging ethnic voters may be dependent on parties of the left, these same parties have certainly not recognized much dependency the other way, either in concessions of representation or in policy commitments.

Finally, there is the question of the impact of immigration on state sovereignty. This brings us back to a central question. Have states lost control of their frontiers; are they no longer able to manage immigration? Messina does a masterful job sorting out the problem, explaining that there is a difference between absolute control of the frontier, which has never existed, and political control, which "even in the best of circumstances…can only be imperfect, as the policy implementation process predictably throws up new and unexpected political challenges" (p. 98). By carefully examining the British and German cases of policy development, he puts to rest a series of analyses meant to explain the decline of sovereign decision-making power with regard to immigration.

If it is assumed that rhetoric ("zero immigration") is not the same as policy (limited immigration), and that no policy can ever be completely controlled or its outcomes completely predicted, British and German policymakers made bold, controversial, and not always predictable decisions on immigration. The case that Messina makes for Britain and Germany can also be made for France and other countries in Europe. For better or worse, countries in Europe have been willing, perhaps surprisingly, to take measures that violate their own values of embedded liberalism, that deviate from path-dependent practices, and that resist the pressures of globalization in order to maintain control over their frontiers. Thus, contrary to what is usually assumed, the impact of immigration has been to strengthen state authority, as well as state institutions that deal with immigration control.

One of the great virtues of *Immigration and Conflict in Europe* by Rafaela M. Dancygier is that she ventures systematically where few have gone before, to the local level, to analyze immigrant conflict with both native populations and state authorities.

Her purpose is to show how differences in national political institutions and immigration regimes tend to shape and interact with economic conditions, as well as the behavior of different immigrant groups, to cause variations of immigrant conflict across groups, cities, and countries. Thus, this is a rich and important contribution to comparative analysis in a number of different ways. At the same time, it compares localities, ethnicities, and countries. Some of this has been done before, but never with this kind of sophistication, and never in analyzing ethnic/immigrant violence.[16] In addition, Dancygier focuses on one of the key questions addressed by Messina, immigrant electoral power. She argues that the interaction of economic scarcity and immigrant electoral power accounts for both immigrant-native and immigrant-state conflict. Both kinds of conflict occur in the context of local economic scarcity, where natives and immigrants are competing for scarce goods. Differences in immigrant electoral power, in turn, lead to variation in the type of conflict that occurs.

When immigrants can produce votes, local politicians will be tempted to allocate important resources to this emerging constituency. However, as Dancygier convincingly demonstrates (p. 100), the avoidance of immigrant-state conflict then leads to immigrant-native conflict since natives are likely to react to this shifting allocation by attacking immigrants. On the other hand, without political leverage, immigrants are more likely to make demands directly to state actors. In addition, both types of conflict are more likely to occur when the state (as opposed to the market) is responsible for disbursement of scarce goods. Dancygier does not argue that identity-based differences are unimportant in analyzing conflict. However, on their own, "immigrants' ethnic or religious backgrounds cannot explain the wide variation in both faces of immigrant conflict we observe within and across countries" (p. 11).

The primary focus of her study is immigrant conflict in Britain, with a comparison with Germany, and a more superficial comparison with other countries, primarily France. Although each country study is thoroughly researched, the comparison becomes more difficult as it moves from Britain to Germany to France. The chapters on Britain are the most elaborate, the best documented, and the most supportive of the main thesis of the book. They also demonstrate the political complexity of ethnic relations in a country where immigrants should have relatively easy access to political power. Unlike other countries in Europe, immigrants from Commonwealth countries (that is, virtually all of the major sources of immigration) have the right to vote and to run for office very soon after they are legally settled in the UK. Nevertheless, "the Labour Party did not always reach out to the new voters and was also cautious about weighing immigrant supporters against potential losses among natives" (p. 84). Labour's ambivalence is part of a larger problem for immigrant populations in Britain—how to assert political power at both the local and national levels. Concentrations of immigrant populations are limited mainly to London and the West Midlands (the local settings for this study), and even there the political success of immigrants has been quite limited, and more limited at the national than at the local level.

The comparison with Germany is fascinating because of the skill that the German state used to manage two types of conflict. Conflict between natives and *Aussiedler*

(ethnic Germans from Eastern Europe and Russia) and asylum seekers was provoked by the immigrants' claims (under law) to scarce economic goods. This conflict declined rapidly when the law was changed, revoking many rights to make these claims. Conflict between the state and guest worker immigrants was reduced, argues Dancygier, by a combination of skillful use of welfare state instruments, combined with relatively high rates of guest worker returns to their native countries. The analysis is largely convincing, but not based on the kind of local studies used in the British case.

The French comparison is even more distant from the core of these studies because it is based not on incidents of violence, but on support for the anti-immigrant National Front. By focusing on local electoral support for the National Front, this short study is interesting and suggestive but compares poorly with the British and German cases. The key reason is that, while voting for the radical right is an option for the native population, a large proportion of the immigrant population cannot vote, and therefore the analysis is limited to native reaction rather than immigrant action.

There is one additional major problem with the French comparison. Using local election data from 1995 and 2001, Dancygier demonstrates a surge in National Front local support in 1995 and then a sharp drop in 2001. She also shows that electoral success of Maghrebi candidates in certain localities is related to a backlash vote for the National Front, but only where there is high unemployment. She then argues that support for the National Front fell in 2001 in part because mainline political parties refused to nominate Maghrebi candidates, and minority turnout rates dropped. This is an intriguing argument, but there is no way to demonstrate minority turnout (although she does approximate minority population). A more serious problem is that there is no way to demonstrate a relationship between flagging National Front success and a drop in a xenophobic reaction. In 1998–1999 the National Front split, and by 2001 the two factions were in intense competition at the local level, where both lost (temporarily, as it turned out). The main story Dancygier tells about Britain and Germany is of immigration and conflict. The French story, however, is somewhat different in that it focuses on the impact of immigration on party competition and voter volatility.

It is often assumed, following the same logic, that immigration has had an impact on citizenship regimes, and that this transformation is in the direction of convergence. In fact, while some countries have moved toward more inclusive and open citizenship and naturalization processes, others have developed more restrictive legislation. While Messina outlines the divergent changes, Marc Morjé Howard analyzes the process through which these policies are changing. In *The Politics of Citizenship in Europe*, Howard focuses on the impact of the politics of immigration in European countries on citizenship policy.

But is citizenship an important issue in an increasingly "post-national" world? In a sense, this is part of the question concerning sovereignty. In most liberal democracies, some civil and many social rights are extended to almost all workers and legal residents. In this context, "political rights are no longer a prerequisite for social rights" (p. 5). Following the post-national argument, the emergence of transnational human rights, as well as transportable social rights, has diminished the importance of national citizenship;

or has it? Howard argues that the predictions of the death of the nation-state and the decline of national citizenship have been greatly exaggerated. He elaborates the continuing importance of citizenship for political influence, important welfare state benefits, public employment, and indeed national integration. He might have added that it is still the state that is responsible for guaranteeing the rights of resident aliens; and, as Messina notes, what the state gives transnationally, the state can also take away (and has).

This excellent book is the best comprehensive study of European citizenship policy that currently exists. Its descriptive sections are an invaluable reference, and its analytical sections are an important contribution to our understanding of two questions: what accounts for differences in citizenship policy among countries at similar levels of development; and what accounts for changes in well-established policies? In other words, how are patterns of path dependency altered? In comparing the fifteen core (older) countries of the European Union, Howard draws upon a major compilation and comparison funded by the European Commission, "the most detailed, comprehensive, and systematic analyses of citizenship policies that exist to date."[17] Using this rich data source, he focuses on three aspects of citizenship policy for developing criteria of "liberal," "medium," or "restrictive," including whether a country grants citizenship by birth *(jus soli*), the length of time required for naturalization, and whether naturalized citizens can hold dual citizenship. In explaining similarities and differences, Howard uses a broader range of explanations than Rogers Brubaker in his comparison of France and Germany, although there are overlaps in their historical analyses.[18] In general, he argues that countries with a colonial heritage, as well as "early democratizers," tended to develop more open, inclusive, and liberal citizenship policies. Those countries without a colonial heritage that became democracies in the twentieth century tended to be more exclusionary, protective, and restrictive.

Howard's most innovative contributions are the chapters that explain why these policies have changed over time, and his elaboration of the politics of citizenship. The most intriguing problem he analyzes derives from the same political dilemma outlined by Messina. How have six countries been able to liberalize their citizenship policies, while five have either resisted change or developed more restrictive policies? In fact, given the political marginalization of ethnic minorities, the core question is how liberalization is possible at all. Howard acknowledges that there are external pressures for liberalization, such as economic globalization and trends toward "postnational" human rights, linked to the strengthening of judicial decision making throughout Europe. However, these pressures are strongly countered by strong anti-liberalization public opinion, weak interest group mobilization, and the strength of radical right political parties. Searching for an empirical baseline for understanding variance in liberalization, Howard discovers that existing scholarship is far better at explaining liberalization than explaining variance (why some countries liberalized while others did not) (p. 54).

In his analysis, two variables emerge as key to understanding variance in policy choices among countries, as well as across time in each country. The first is the party variable, essentially a left-right dimension. His findings generally support the argument

found in Messina that the left is more open to liberalization of citizenship policy than the right, and therefore who governs is necessarily, but not sufficiently, important. The second variable is the mobilization capacity of the radical right, which in turn often spills over into the pressures on the established right—and, I must add, sometimes the left (for reasons explained above)—to support more restrictive citizenship policies. Here the emphasis is on electoral mobilization and electoral challenge. That challenge, then, becomes decisive because it relates to a third dimension, the arena of decision making. As long as the process remains on the elite level (what some scholars have called "insulated elites"), pressures for liberalization are more likely to result in more open policy. If, however, anti-immigrant sentiment is activated and mobilized in the electoral arena, the tendency will be toward restriction (p. 11).

This analysis generally works well, particularly for explaining change in countries where policy has been liberalized. The nuances of the politics of citizenship in these cases are then explained more fully in the country case studies that follow the analytical chapters in the first part of the book. The analysis is perhaps most problematic, however, in dealing with those cases where relatively liberal policy has been maintained, and where there has been little change ("historically liberal countries"). The British case presents the most problems. Although it certainly fits the liberal category in terms of the three measures used in this study, British policy became far more restrictive just prior to the first period analyzed in the first chapter (1980s). Between 1962 and 1981, both Conservative and Labour governments in Britain acted to redefine citizenship in a more restrictive way. Both parties sought to limit the pressures of the electoral arena by developing a bipartisan understanding that narrowed the definition of citizenship, and that converted many millions of British subjects into noncitizens. In the end, British citizenship policy remained relatively liberal, but applied to a far more restricted population (those who were actually able to gain access to the UK.)

It can therefore be argued that insulated elites are more capable of developing more liberal citizenship (or immigration) policies, but that they can also agree on more restrictive policies depending on how they frame the issue. Indeed, the British case indicates that politically insulated elites of the left are perfectly capable of developing and agreeing to restrictive immigration policy. In the United States relatively insulated elites have promoted both restriction (1890–1924) and more expansionary immigration policies (Western Hemisphere immigration after 1924 and Hart-Celler in 1965). Within the electoral arena, conditions of high salience have supported restriction, but have also promoted more open immigration policies, particularly where and when immigrants have been seen as a potential political resource.[19]

More generally, the analysis is also not as strong in explaining why the four countries with historically liberal policies (France, Belgium, Ireland, and the UK) were able to maintain those policies, more or less, even when the key political variables changed in such a way to support the development of more restrictive citizenship policies, in France and Belgium in particular (ch. 7). While the question of citizenship requirements has emerged as a highly polarizing political issue in both countries, it is striking, as Howard rightly argues, that the result has been only minor tinkering with

citizenship laws, at least in recent years. He explains that in Belgium citizenship policy has been more or less insulated from national politics and dealt with at the regional level. Nevertheless, this seems to beg the question, and the maintenance of liberal citizenship policy in Belgium needs more intensive explanation, given the strength of the radical right, particularly in Flanders. The maintenance of liberal policy in France is problematic for some of the same reasons, and also because of the trend toward more restrictive immigration policies. Of course, the answer to this puzzle may very well be that path dependency makes it more difficult to restrict than to liberalize citizenship policy.

In *The Ironies of Citizenship,* Thomas Janoski implies a great deal about the durability of path dependency. Although he focuses on nationality laws and naturalization rates rather than citizenship, his approach is similar to that of Howard as well as several other scholars.[20] To explain variations in nationality and naturalization policies, he first elaborates a set of categories that are based on a country's colonial/settler past. Janoski's categories, unlike those developed by other scholars, are dynamic and developmental. They are generally based on dynamics of interaction between the colonizing country and the colonized population.

For "colonizing countries" he looks at multiple stages of colonization that take fifty to one hundred years, each of which has an important impact on the development of naturalization policy. Although colonization begins with occupation, over time, the colonized develop more substantial claims on citizenship rights both in the colonies and ultimately in the home country, generating relatively high naturalization rates.

If colonization is short lived and does not get beyond the stage of occupation and control ("noncolonizing, occupying countries"), the impact is very different both for both the colonizers and the colonized. The colonizing state "has no incentive to offer naturalization"; Europeans do not emigrate to the colonies, Janoski argues, although they may very well emigrate to other countries. The result is that the noncolonizing country, challenged by emigration, develops a strong, romantic nationalism that precludes more open naturalization. Thus, naturalization rates should be low.

"Settler countries" are different in many ways. They emerge from the first stages of colonization, but have successfully suppressed (or killed) indigenous peoples. As a result, unlike colonizing countries, the growing settler population overwhelms the declining native population, and creates a dynamic that favors both immigration and more inclusive citizenship rights to expand the European population. With the lowest barriers to nationality, naturalization rates, Janoski hypothesizes, should be the highest among the three groups.

Therefore, the dynamics that drive policy formation are historically derived and, by implication, path dependent. Nevertheless, demographic, economic, and political variables can have an impact on variations in naturalization from year to year, and even long term. Although "postcolonial empires [for example] will attempt to close off naturalization processes to limit the impact of foreigners in their country [and] the path-dependent processes developed during empire will slowly evolve into more restrictions on naturalization…[they will remain]…within the general range of their regime

model" (p. 22). Therefore, Janoski argues that a certain amount of policy and empirical convergence has and will evolve, but the differences among regimes will remain.

In this analysis, Janoski sees two ironies (hence the title of the book). The first relates to the colonizing countries as a group. By conquering other nations, and then offering political and economic incentives to secure allegiance and legitimacy among those who are colonized, "colonizers inadvertently expand diversity, tolerance, and citizenship" (p. 3). The second relates to the key political explanation of day-to-day change. The left historically has opposed immigration, but because left parties and trade unions have been seeking new constituencies to maintain their electoral standing, they have supported and welcomed newly naturalized citizens (p. 3). Indeed, they have generally supported easier and more open naturalization.

One of the more important parts of this book is the development of more rigorous measures for key variables. Some of these measures elaborated in Chapter 2 are more or less original (colonization/occupation), but others are built on what other scholars have done (barriers to nationality). A reading of Janoski's careful elaboration of each measure gives us a better understanding of the difficulty of cross-national institutional comparison. It is a considerable feat to analyze naturalization rates and institutional variables across eighteen countries over thirty-seven years.

The heart of the book consists of two chapters that analyze colonizing countries (France and Britain) and the group of settler countries, three chapters that compare countries that are culturally similar but have very different rates of naturalization (Austria/Germany/The Netherlands/Belgium), and a chapter on the Nordic countries that should have low naturalization rates but do not. In the first two chapters, the general explanation of the book works well, with a few exceptions. In the culturally paired studies, a history of empire clearly outweighs culture; and in the Nordic countries, the lack of empire history is outweighed by the domination of governments of the left. These chapters are rich in historical and demographic detail. Each chapter also focuses on exceptions from the general argument and attempts to deal with them, sometimes not well. For example, as expected, France and Britain have relatively high rates of naturalization, but the British rate is consistently higher than the French rate. Janoski explains the distinction in part by racial differences ("the French empire is more African and Asian than the British Empire and these immigrants are much more visible," p. 87), in part by differences in rates of emigration (the French stayed home while the British emigrated to the Old Commonwealth), and in part by differences in laws on *jus soli*. But these explanations are not strong. There is no evidence that "visible" differences are any greater in France than in Britain. The argument about differences in emigration is weakened by the fact that only a small proportion of naturalized immigrants in Britain now come from the white Commonwealth. The law on *jus soli* has been similar in both countries since 1981 (more demanding than in the United States), and may account for lower rates in Britain since then, but it cannot account for the doubling of French rates between 1990 and 2006. In addition, this chapter presents evidence that somewhat undermines the strength of the argument made about the importance of left party power, and tends to ignore what has sometimes been called a consensus between the Conservatives

and Labour on immigration/citizenship policy.[21] Although Janoski notes some of the shifts in the position of the Labour Party toward restriction after 1962, he never integrates this into his theoretical argument.

The explanations of American exceptionalism are also weak, and certainly different from the literature. Among the settler countries (the United States, Canada, Australia, and New Zealand), the United States has the lowest naturalization rates, the lowest percentage of foreign populations, and the lowest acceptance rates for refugees. Janoski explains this difference largely by the American "tendency toward empire," one consequence of which is that "[t]he United States clearly resists a policy of multiculturalism… [and] it clings to an assimilationist view of integration like France…" (p. 122). While one can argue about the tendency toward empire, the large literature on models of integration clearly places the United States in the camp of countries with multicultural integration policies, the polar opposite of France.[22]

Still, this is an interesting and challenging study because it adds to the literature on citizenship that attempts to lay out a theory of naturalization. The theory elaborated here is different from those that attempt to explain differences in citizenship regimes. However imperfect, Janoski has broken new ground in our comparative understanding of the naturalization process in citizenship.

The four studies reviewed here are most notable for the comparative political perspective they bring to bear on questions of immigration. Unlike most of the published research on international migration, these books are comparative in their approach, as well as in their conclusions. Each focuses on politics and the ways that the political process shapes international migration and reacts to it. The authors deal not simply with the state as an actor, but with the complexity of the ways that state actors develop their policies, and the impact of these policies on migration and citizenship policy.

The approach taken in these studies in some ways fits well with some of the critical recommendations of Adrian Favell, who urges scholars to consider what makes undocumented immigrants crossing borders different from legal immigrants, tourists, truck drivers, or shoppers who are crossing the border for the day. Clearly, he argues, the difference is the way the state has defined these cross-border movements. However, "social relations, networks, transactions, and events, spanning both physical and virtual spaces, have local, regional, or global patterns that do not correspond in any way to the container that the nation-state view might wish to impose upon them." We might, then, look at the impact of these movements upon the nation-state itself, how it changes in the process of defining and managing migration, that is, "how the nation-state gets constructed and reproduced."[23] This formulation, of course, reflects concerns among both scholars and voters about having the same Europe with different people.

It also informs Howard's analysis of change or, more precisely, different kinds of change. Although citizenship policy has been changing throughout Europe, it is neither converging nor becoming Europeanized. Essentially, the stubbornly different policies reflect different reactions to immigration that have produced different approaches to understanding how the nation-state gets reproduced. If Howard's analysis focuses on the ways the state has reformulated citizenship in reaction to immigration, Messina's

work reminds us that the state has been strengthened in unanticipated ways in the process of defining and managing migration. Moreover, both Messina and Howard emphasize the social and economic barriers that continue to separate immigrant/ethnic communities from mainstream European societies, and Messina convincingly demonstrates how little immigrants and immigrant interests have penetrated the political system, despite the violence analyzed by Dancygier.

These rich studies draw on an increasing volume of research that has developed in the last twenty-five years on the politics of immigration. In their own findings, they synthesize and critically analyze the best scholarship in this area, and present us with a baseline for new scholarship to follow.

These studies also indicate some fruitful paths for future research. Most needed, still, is additional work on immigrants as political actors. There is an abundance of scholarship that deals with immigrants and politics, but little with immigrants in politics. Although each of these studies makes reference to immigrants as actors in various ways, these efforts are limited and suggestive. Most striking about the politics of immigration in Europe today is how marginalized immigrant and ethnic populations appear to be in political life. Scholarship tends to focus overwhelmingly on immigrants as objects of xenophobic movements, political party conflict, and voter backlash. Yet, in the countries studied in these books, there are large immigrant populations who will vote and participate increasingly in political life in the twenty-first century.

The limited number of quality studies of immigrants in politics concentrate for the most part at the local level.[24] However, there is almost no scholarship that deals with how political parties are adjusting to a changing electorate on the national level; or how immigrant groups are mobilizing to have their issues heard; or changing patterns of state organization to deal with immigrant demands or incorporation of immigrant populations.

A generation ago, the study of the politics of immigration was somewhat exotic for political scientists. This is no longer true. Some of the best and most creative students of comparative politics and international relations have now made this the focus of their interest. The four books reviewed here clearly indicate the quality of what is yet to come.

NOTES

1. Catherine Wihtol de Wenden, *Les Immigrés et la politique* (Paris: Presses de la FNSP, 1988).
2. Mark J. Miller, *Foreign Workers in Europe: An Emerging Political Force* (New York: Praeger, 1981).
3. Kristi Andersen, *The Creation of a Democratic Majority: 1928–1936* (Chicago: University of Chicago Press, 1979).
4. Seymour Martin Lipset, *Political Man: The Social Basis of Politics* (New York: Doubleday, 1959).
5. On the emergence of the concept of ethnicity, see Victoria Hattam, *In the Shadow of Race: Jews, Latinos, and Immigrant Politics in the United States* (Chicago, University of Chicago Press, 2007).
6. James Hollifield, *Immigrants, Markets and States: The Political Economy of Postwar Europe* (Cambridge, MA: Harvard University Press, 1994).
7. See, in particular, Christian Joppke, ed., *Challenge to the Nation-State: Immigration in Western Europe and the United States* (Oxford: Oxford University Press, 1998), Introduction; Aristide Zolberg, "Matters of State: Theorizing Immigration Policy," in Noah, M.J. Pickus, ed., *Becoming American, America Becoming* (New York: Russell Sage Foundation, 1999); and Virginie Guiraudon and Gallya Lahav, "The

State Sovereignty Debate Revisited: The Case of Immigration Control," in *Comparative Political Studies*, 33 (March 2000): 163–95.

8. Rogers Brubaker, *Citizenship and Nationhood in France and Germany* (Cambridge, MA: Harvard University Press, 1992).

9. Christian Joppke, "How Immigration is Changing Citizenship," *Ethnic and Racial Studies*, 22 (1999): 629–52; Randall Hansen, *Citizenship and Immigration in Post-War Britain: The Institutional Origins of a Multicultural Nation* (Oxford: Oxford University Press, 2000); Yasemine Nuhoglu Soysal, *The Limits of Citizenship: Migrants and Post-National Membership in Europe* (Chicago: University of Chicago Press, 1994); Miriam Feldblum, *Reconstructing Citizenship: The Politics of Nationality Reform and Immigration in Contemporary France* (Albany: SUNY Press, 1999).

10. See, in particular, the collection of essays in "FORUM: How are Europeans Made? Debating a National Models Approach to Immigrant Integration," in *Perspectives on Europe* (Autumn 2010): 35–50; Christophe Bertossi, "National Models of Integration in Europe: A Comparative and Critical Analysis," in Special Issue of *American Behavioral Scientist*, "Immigration, Incorporation, and Diversity in Western Europe and the United States: Comparative Perspectives," 55 (December 2011), Nancy Foner and Christophe Bertossi, eds., and Special Issue of *Comparative European Politics*, 10 (July 2012), Christophe Bertossi, J.W. Duvendak and Martin A. Schain, eds.

11. See Martin Schain, "Minorities and Immigrant Incorporation in France," in Christian Joppke and Steven Lukes, eds., *Multicultural Questions* (Oxford; Oxford University Press, 1999).

12. Hans-Georg Betz, *Radical Right-Wing Populism in Western Europe* (New York: St. Martin's Press, 1994); Pippa Norris, *Radical Right: Voters and Parties in the Electoral Market* (New York: Cambridge University Press, 2005); Herbert Kitschelt and Anthony J. McGann, *The Radical Right in Western Europe: A Comparative Analysis* (Ann Arbor: The University of Michigan Press, 1995); Terri E. Givens, *Voting Radical Right in Western Europe* (New York: Cambridge University Press, 2005); Cas Mudde, *Populist Radical Right Parties in Europe* (New York: Cambridge University Press, 2007).

13. Martin Schain, "The Impact of the French National Front on the French Party System," in Martin Schain, Aristide Zolberg, and Patrick Hossay, eds., *Shadows Over Europe*: The Development and Impact of the Extreme Right in Western Europe; Michelle Hale Williams, *The Impact of Radical Right-Wing Parties in West European Democracies* (New York: Palgrave, 2006).

14. Roger Karapin, "The Politics of Immigration Control in Britain and Germany: Subnational Politicians and Social Movements, *Comparative Politics,* 31 (July 1999): 423–44; Michael Minkenberg, "The New Right in Germany: The Transformation of Conservatism and the Extreme Right," *European Journal of Political Research*, 22 (July 1992): 55–81; Daniel J. Hopkins, "Politicized Places: Explaining Where and When Immigrants Provoke Local Opposition," *American Political Science Review*, 104 (February 2010): 40–60.

15. Romain Garbaye, *Getting into Local Power: The Politics of Ethnic Minorities in British and French Cities* (Oxford: Blackwell, 2005).

16. Partick Ireland, *The Policy Challenge of Ethnic Diversity* (Cambridge: Harvard University Press, 1994).

17. Rainer Bauböck, Eva Ersbøll, Kees Groeneddijk, and Harald Waldrauch, eds., *Acquisition and Loss of Nationality* (Amsterdam: Amsterdam University Press, 2006).

18. Rogers Brubaker, *Citizenship and Nationhood in France and Germany* (Cambridge, MA: Harvard University Press, 1992).

19. See my analysis in *The Politics of Immigration in France, Britain and the United States* (New York: Pagrave Macmillan, 2008), pp. 164–66; 254–56.

20. Stephen Castles and Mark Miller, *The Age of Migration*, 5th edition (London: Palgrave-Macmillan, 2009); and Christian Joppke, *Selecting by Origin: Ethnic Migration in the Liberal State* (Cambridge: Harvard University Press, 2005).

21. There is a large literature on the movement of the Labour Party toward restriction. See. Schain, 2008, pp. 162–66; Randall Hansen, *Citizenship and Immigration in Post-war Britain* (Oxford: Oxford University Press, 2000), chap. 6.

22. See Schain, 1999.

23. Adrian Favell, "Re-booting Migration Theory: Interdisciplinarity, Globality and Post-disciplinarity in Migration Studies," in Caroline B. Brettell and James F. Hollifield, eds*., Migration Theory, Talking Across Disciplines* (New York: Routledge, 2008), pp. 268–72.

24. See, for example, Romain Garbaye, *Getting into Local Power: The Politics of Ethnic Minorities in British and French Cities* (Oxford: Blackwell, 2005).