Political Science and Comparative Immigration Politics

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The most comprehensive reviews and critiques of theories of international migration published in the last decade cover a broad range of issues, but have nothing to say about the politics of immigration nor the sources and consequences of migration policy (Massey, et al., 1993, 1994; Massey, 1998). This oversight reflects both the tendency of scholars outside political science to neglect the political dimensions of migration, even so obvious a topic as state regulation of population flows, and the equally unfortunate tendency of students of politics to ignore migration altogether. Those political scientists who have worked on migration issues in the past have found audiences mainly among sociologists, anthropologists, and historians and have most often operated in multi-disciplinary settings. They have scarcely touched political science as a discipline. This may in part reflect the fact that the fledgling political science of immigration has been theoretically weak, focusing on thick description and seat of the pants interpretation, and given to normative posturing and disputation.

This has begun to change. The consequences of the post 1960s migration into the industrial societies have finally attracted the attention of a wide range of scholars and the salience of politics to migration phenomena has become irrefutable. The new research being done on migration displays more concern with developing and exploiting theories. Recent surveys of the theoretical landscape in the political science literature on migration reflect these changes (Zolberg, 1999a, 1999b; Hollifield, forthcoming). Nevertheless, we have a long way to go before we have in hand a well-developed and widely-tested theory or set of theories that purports to explain and predict the role of state regulation of migration, the dynamics of the politics of immigration, the conditions of immigrant political incorporation across a variety of national cases, and the role of migration in international relations.

This paper has the limited goal of reviewing a small number of theoretical perspectives that have been usefully employed by political scientists in the study of comparative migration politics; it makes no claim of covering the whole range of alternatives. The first perspective is that of political economy. Work in this vein is concerned primarily with determining who wins and who loses from migration, how the experience of these benefits and costs affect the incentives of individuals and states with respect to migrants and migration policy. The second perspective is institutionalist in that it proceeds from the structural, procedural and normative characteristics of liberal democracies to account for immigration politics and policy. I discuss each of these broad approaches, point to illustrative works in the literature, and identify specific hypotheses. I turn then to an abbreviated discussion of how the different approaches seem to fit the evidence as gleaned from recent immigration politics in three traditional countries of immigration: Australia, Canada, and the United States. This part of the paper is meant to do no more than suggest the possibilities, and limits, of the various theoretical constructs as they seek to make sense of highly complex comparative cases.
Political Economy

Political economy, the study of the connections between political and economic life, seems an appropriate approach to migration because migrants are typically factors of production (labor) and migration flows often track labor market conditions and respond to differences in wage levels between sending and receiving countries. Even when migrants are not active in the labor market their presence affects the consumption, production, and fiscal outcomes of the receiving states. Political economy presumes that individuals, as consumers and producers, act on the basis of their interests as they see them. Migrants, in this view, respond to the incentives they confront, as do employers and other members of the indigenous population. Political economy assumes that states can manage immigration policy for a variety of purposes. How the costs and benefits are calculated, and thus which policy options will be adopted, depends on the characteristics of the political process (Veugelers, 2000).

From the perspective of political economy it is not rights or liberal norms that determine immigration politics and policy but interests. Despite the claims of some immigration advocates that ‘everyone’ is better off under various liberal immigration regimes, in the real world there are likely to be winners and losers from all processes of social change, at least in the short term, and their identification is the heart of the matter. Freeman (1995) takes a step in this direction. Applying a framework devised by Wilson (1980), he derives four types of politics depending on whether the benefits and costs of policies are concentrated or diffuse (See Table 1). Into which category immigration falls, that is, how the costs and benefits of immigration are distributed is not obvious. Instances of the diffuse benefits of immigration come readily to mind: economies of scale, a larger domestic market, higher gross domestic product, an enriched and more dynamic cultural stew. Concentrated costs might result from an influx of cheap labor that drives down wages in affected sectors, weakens unions, and competes with natives for scarce housing. On the other hand, examples of the concentrated benefits of migration abound: inexpensive and pliable labor for employers, family reunion for previous migrants, etc. The relatively marginal effect on resource depletion of a population enlarged by migration or increased crowding are examples of diffuse costs.

Immigration, or even immigration policy, is an ambiguous construct that encompasses such diverse phenomena as regulation and control of entry at the borders, active recruitment of skilled workers, a regular program of settlement for refugees, or temporary entries for educational, business, and tourism, among others. The actual allocative pattern will depend on the specific characteristics of particular types of migration in given periods, which in turn will depend to some extent on the regulatory regime in place. The Wilsonian framework gives the impression that every issue or policy produces only one pattern of cost/benefit distribution, but this is not a necessary assumption. In fact, all immigration regimes change periodically and as they do we would expect the distributive pattern to change as well. Over time, the same policy can produce a larger or different immigrant pool, with consequent effects. Moreover, the immigrants themselves can change their behavior by assimilating or refusing to do so, or by engaging in homeland politics. In general we should anticipate that as economies evolve, and their labor requirements shift, the sorts of immigrants needed or coming may change.
While the economists try to determine the impact of migration on such empirical economic indicators as GDP per capita, inflation, wage levels, and budget expenditures and revenues, the political economist is alert to the process by which migration is socially defined or constructed by activists, intellectuals, the press, and governments in ways that may have little or nothing to do with the underlying empirical reality. In the relatively open liberal democracies where government policies may be vigorously challenged and free debate is the norm one anticipates that successful “constructions” will bear some plausible relation to the “truth”. Nevertheless, the level of information about the consequences of migration for society as a whole or for particular groups is quite low. This large information deficit makes migrants attractive objects onto which one can project both good and bad characteristics by third parties. The role of political entrepreneurs in scapegoating migrants for a variety of social ills is the most often cited, but it is perfectly obvious that immigrant advocates engage in the same process when they tout the admirable work ethics, morals, family values, and general goodness of migrants, as if they were not subject to all the human flaws of the “racist” receiving population.

Table 1 extrapolates from Wilson’s general framework to predict the level of conflict and immigration policy that ought to result from each of the four modes of politics.

<table>
<thead>
<tr>
<th>Cost/Benefit Distribution</th>
<th>Mode of Politics</th>
<th>Level of Conflict</th>
<th>Immigration Policy Predicted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concentrated benefits, Concentrated costs</td>
<td>Interest Group</td>
<td>High</td>
<td>No prediction (Periodic change? Logrolling?)</td>
</tr>
<tr>
<td>Concentrated benefits, Diffuse costs</td>
<td>Clientele</td>
<td>Low</td>
<td>Expansive</td>
</tr>
<tr>
<td>Diffuse benefits, Concentrated costs</td>
<td>Entrepreneurial</td>
<td>High</td>
<td>Restrictive</td>
</tr>
<tr>
<td>Diffuse benefits, Diffuse costs</td>
<td>Majoritarian</td>
<td>Low</td>
<td>No prediction (Bureaucratic dominance? Incremental growth?)</td>
</tr>
</tbody>
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Adapted from James Q. Wilson (1980).

Freeman (1995) argues that the typical mode of immigration politics in the liberal democracies is client politics in which policymakers interact intensively and typically out of public view with groups having direct interests in immigration. Client politics develops, according to the model, because the benefits of immigration tend to be concentrated while its costs are diffuse. This gives those who expect to gain from migration stronger incentives to organize than those
who anticipate bearing its costs. Client politics should be associated with expansive policies. The limits of Wilson’s simple typology become apparent as it is applied to particular cases. In a recent paper Freeman employed the model in the context of post-1994 immigration policy in the United States. Although the client mode is dominant, he finds new elements which he calls “populist”, a category not part of Wilson’s framework (Freeman, 1998a). Populism shares characteristics with Wilson’s entrepreneurial mode, including high levels of conflict and a penchant for restrictionism, and with interest group politics to the extent that opponents of immigration gain additional voice. It typically entails the activities of entrepreneurial politicians of the sort represented by Jean-Marie Le Pen in France, Joerg Haider in Austria, Preston Manning in Canada, Pauline Hanson in Australia, and Patrick Buchanan in the United States who engage in the mobilization of resentment among groups whose members believe they are adversely affected by immigration. Successful entrepreneurs may succeed in institutionalizing competition between pro and anti-immigration groups, leading to the emergence of a more stable interest group mode. Populism would be, in this case, a transitional mode rather than a stable and sustainable arrangement. If it succeeded, it would become institutionalized, if it did not, it would tend to decline in significance and the system would revert to a modestly reformed status quo ante.

Supposing that the distributional pattern of the costs and benefits of migration is critical to understanding migration politics, it is still necessary to identify those groups or sectors of the society who stand to gain or lose. It is possible to turn this into a strictly empirical exercise by identifying groups for and against various aspects of immigration policy and inferring from their behavior their perceptions of benefit or cost. From the perspective of building a theory, however, it is preferable to begin with a set of premises from which one can predict the preferences and identities of various groups in regard to immigration policy. Kessler (1997, 1999) suggests that the key interests with a stake in immigration policy outcomes should business and labor. Employing a factor endowment model of national economies, he generates predictions of immigration policy preferences of domestic actors. Building on the Stolper-Samuelson theorem (1941) which holds that owners of productive factors that are in abundance in a country gain from trade while those who own scarce factors lose, Kessler argues that the welfare effects of immigration on domestic factors of production in the receiving states, especially labor, are “key determinants of a country’s immigration policy” (Kessler, 1997). If immigrants and domestic labor are complements, labor should be relatively open to migration, but where foreign and domestic labor are substitutes labor should lobby for protection via immigration restriction. Table 2 gives the hypotheses from Kessler’s model with respect to the demand for immigration. Labor alone has clear incentives to support restriction of immigration. Owners of capital or land either have reasons to back liberal admissions or, at worst, have no economic reasons to favor restrictions. Whether labor’s demand for restriction will be met depends on a country’s factor endowments and which factor(s) are predominant in the political process. Kessler elaborates this simple model considerably by analyzing separately skilled and unskilled labor and specific industrial sectors.
Table 2. A Factor Model of Immigration Policy Preferences

<table>
<thead>
<tr>
<th>Productive Factors</th>
<th>Immigrants complement or supplement domestic labor</th>
<th>Demand for Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land</td>
<td>complement</td>
<td>liberal</td>
</tr>
<tr>
<td></td>
<td>substitute</td>
<td>no restrictionist incentives</td>
</tr>
<tr>
<td>Capital</td>
<td>complement</td>
<td>liberal</td>
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<tr>
<td></td>
<td>substitute</td>
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</tr>
<tr>
<td></td>
<td>substitute</td>
<td>restrictionist</td>
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</tbody>
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While most political economy perspectives like that of Kessler derive from neo-classical economics, the theory of postindustrial change takes a more structural approach and deals with the sociological consequences of underlying economic transformations. Analysts working in this tradition see current migration trends and state policies as reflecting shifts in national and global socio-economic arrangements. They explore the effects of the rate, scale, and content of social change in contemporary, liberal-capitalist societies on particular groups and social strata. Globalization and the transition from industrial to postindustrial, knowledge-based economies produce winners and losers, not only between rich and poor nations but among the populations of the rich nations. Migration of labor is a central attribute of globalizing economies and attitudes toward migration should vary according to whether one is profiting or losing from globalization. Specific hypotheses generated by this perspective are (1) that persons involved in the leading sectors of the new global economic order will be more favorable to migration than those in declining sectors, (2) that anti-immigrant movements and parties should draw disproportionately from such sectors, and (3) cosmopolitan attitudes and the social milieus identified as the “new class” should breed support for immigration and associated multicultural values (Betz, 1994; Betz and Immerfall, 1998; Sassen, 1999; Richmond, 1994; Schnapper, 1994; Minkenberg, 1994; Betts, 1988, 1996, 1999; Bean, 1995; Kitschelt, 1995).

Postindustrial change provides a rationale, and arguably strong competitive pressures, for migration policies designed to attract highly-trained specialists, entrepreneurs, and students as a means of giving national economies a skill and technology advantage in the global market (Sassen, 1988, 1991, 1996, 1998). The theory suggests that it would be profitable to investigate the extent to which migration policy rationales are linked to some interpretation of the incentives associated with globalizing pressures and that the ultimate source of migration policy may be found outside the domestic political sphere in the characteristics of the international economy.

No matter how the consequences of migration are allocated, the groups divided by the
issue must be aggregated by political parties for purposes of contesting elections. For reasons that are apparent, the major political parties in Western democracies have sought to keep immigration from becoming a divisive issue. Although parties of the left, right, and center typically disagree in certain respects over the wisdom of particular migration flows, and may have even more sharply divergent views about multiculturalism and settlement issues, they have, nonetheless, tended to form a consensus around basic questions in order to prevent the outbreak of larger conflicts (Freeman, 1979; Messina, 1989; Hammar, 1985). Bipartisan consensus tended to break down in Europe and elsewhere in the late eighties under pressure from insurgent extreme-right parties. The dynamics of partisan strategic behavior with respect to migration have yet to be laid out satisfactorily.

One promising avenue of research along these lines has been developed by Jeannette Money (1997, 1999). Money begins with the observation that migrants tend to be highly concentrated spatially in all receiving states. Concentration leads to competition between natives and newcomers over market-based resources (jobs in the local labor market), state-based resources (tax revenues and publicly-financed benefits), and community resources (alternative conceptions of society). She suggests that local political parties follow shifts in public preferences on immigration so that “policy positions of mainstream parties [at the local level] will tend to converge toward the local median voter” and “the positions of the parties will tend to shift in tandem” (p. 62). If a majority of local constituencies demand a change in immigration policy, national politicians will respond, but because of the highly concentrated nature of immigration settlement this is unlikely. National politicians attend to particular local constituencies, she suggests, only if the constituency is critical to the outcome of a national election. When anti-immigrant sentiment develops in swing or marginal districts, the national parties pick up the issue. Money tests this hypothesis for Britain, France, and Australia, finding considerable support, but it obviously deserves further investigation.

Institutionalism

Institutional approaches as I understand them here proceed from broad observations about the evolution of liberal democracy both in its nation-state form and as it is embodied in international organizations, treaties, and norms. The institutional literature places less emphasis on interests and more on the concept of rights and values. Soysal (1994), for example, argues that the spread of the concept of the basic rights of persons transnationally creates pressures on states to confer most of the benefits previously reserved for citizens upon resident aliens, or denizens, as well (Bauboeck, 1994). Hollifield (1992, 1998; cf Jacobson, 1996) has developed this approach most fully. He suggests that migration policies in democratic states reflect the more general “embedded liberalism” that students of international politics and foreign economic policy have argued increasingly characterizes western states in the post-World War II era (Ruggie, 1982). The largely economic and military institutions under American leadership that were the organizational framework of the liberal postwar international order lend themselves to support for freer movement of labor, at least freedom of exit. The United Nations refugee regime fits easily within this larger military/economic setting, as do the International Labor Office and the International Organization for Migration. Liberal regimes place a premium on individual rights.
Migrants, as well as citizens, avail themselves of the language and privileges of rights-based discourses and policies. Moreover, in the post-colonial, post-NAZI, post-civil rights era, the acceptable terms of discussion in the democracies have been narrowed in such a way as to exclude as illegitimate populist appeals to ethnic solidarity or homogeneity (for majority ethnic groups at least). In their place, strong commitments to anti-racism and multiculturalism have emerged. That immigration policy is more open and generous in the liberal democracies than elsewhere lends at least a surface plausibility to the contention that there is something inherent in the structure or culture of the democracies, and the international institutions they create and sustain, that brings these patterns about.

The concept of embedded liberalism suggests that migration policy will display evidence of path dependency, a simple notion with large implications for our understanding to the evolution of policy over time and, particularly differences in policy trajectories across nations (S. Steinmo, et al., 1992). Path dependency draws our attention to the way in which particular episodes, experiences, or decisions taken at a given point in time narrow or enlarge future possible courses of action. Given particular decisions at T1, some choices at T2 are either impossible or highly unlikely. Path dependency seeks to move historical exposition from description to explanation as historically antecedent events become the cause of subsequent developments (Hansen, 2000). In this context, the immigration histories of particular countries--whether, for example, they were founded as settler societies and have a long acquaintance with mass immigration or their first large-scale migration experience was during the guest-worker era--emerge as important determinants of contemporary policy.

The model of embedded liberalism is highly general. It seeks to incorporate underlying trends in all the democracies. To be useful in comparative analysis it needs further specification. Some countries may have adopted a more thoroughly liberal, rights-based orientation than others. I propose several hypotheses. The first is that once immigrants and asylum seekers are recognized as having specific rights (to making claims, lodging appeals, being joined by family members, etc.) it will be exceedingly difficult to roll them back (Freeman, 1995). However, rights extended by some states may be more entrenched than those in others. Secondly, as Tocqueville teaches us, democracy once installed tends to develop an expansionary logic of its own so that when rights are recognized for one group the pressure to extend the same rights to those not yet under their cover intensifies. Thirdly, in those states in which liberalism is more fully embedded the courts will play a more important role in establishing and protecting the status of migrants. Judicial activism is expected to be especially important in granting rights of asylum, but also to figure in the efforts of unauthorized migrants to obtain legal status or avoid deportation and of legal migrants pressing such issues as family reunification (Joppke, 1998a, 1999).

The discussion to this point has focused on the demand for migration policies. We need also to address the question of supply, which raises the question of the role of the state. A significant issue in this respect is the relative openness of policymakers to external influence. How far can state decisionmakers act independently of societal forces? For all their similarities, among which are a general openness to popular and group pressures and relatively transparent
decision processes, democratic states vary significantly in their vulnerability to social pressures and in their capacity to generate and implement ambitious, long-term policies in the national interest that impose losses on discrete groups (Weaver and Rockman, eds. 1993; Ireland, 1994). The locus of decisionmaking for immigration is of particular interest. To what extent is policy shaped by the views of the professional civil servants in the administration, controlled by the cabinet or the minister responsible for immigration, or subject to the interventions of individual parliamentarians? What license have the courts to overturn governmental decisions? The answers to these questions do not lead directly to expectations about the direction of policy. In countries where national policymakers are subject to intense pressure from organized groups the sort of policy chosen will depend, obviously, on which groups have access and which policy they prefer. An autonomous state, on the other hand, may choose to follow a number of different immigration policies. Specifying the degree of independence and identifying the locus of decisionmaking is only the beginning, not the end, of our task.

Two competing hypotheses emerge. On the one hand, a bureaucratic supply model would anticipate that administrators responsible for immigration would advocate for large numbers because that would guarantee a larger budget and employee base for the agency. On the other hand, a bureaucratic culture model would presume that the immigration bureaucracy would develop norms favoring strict regulation and, other things equal, smaller numbers in order to maintain control in the same way that finance departments develop budgetary efficiency norms.

The Politics of Immigration in the Settler Societies

Australia, Canada, and the United States are the most important traditional countries of immigration for permanent settlement in the world. They were founded as new societies via the mass migration over extended periods of Europeans and they have run regular, organized, annual migration programs since for many years. Although the U.S.A. receives a much larger contingent of migrants annually (roughly 850,000 in recent years), the foreign as a proportion of the total population are more prominent in Australia and Canada (23 percent and 17 percent, respectively) than in the United States (10 percent). Although there are important differences in the histories of migration to the three countries, including the slave trade in the United States, the transportation of prisoners and the more organized and assisted migration of free persons to Australia), they have followed roughly common trajectories, especially in the twentieth century. This includes their common exclusion of Asian and most non-European migrants until the 1960s or later, and the large increase in annual numbers that characterizes immigration to all three countries from the late sixties to the end of the eighties (Freeman and Jupp, 1992; Adelman, et al., 1994; Price, 1974).

In recent decades all three countries typically adopted liberal and expansive admission and settlement policies. They appeared to be converging by the late eighties on a model of immigration policymaking that approximated “client politics” in which organized interests benefitting from and supporting particular types of migration tended to prevail over less well-organized or less intense opposition. The main political parties sought to avoid open conflict over migration issues, disagreeing only at the margins and creating a rough consensus that supported
gradual expansion despite evidence that public opinion was never enthusiastically in support. In the 1990s, however, immigration politics in these countries was roiled by a variety of populist uprisings that challenged the legitimacy of existing high immigration programs. Only Australia took a strikingly divergent path that entailed tighter controls, declining numbers, and significant retrenchment with regard to multiculturalism. Canada appeared at first to be heading cautiously in the direction of Australia, but backed away in 1998. The United States, for its part, experienced numerous rumblings on the immigration front and the new Republican congressional majority passed highly restrictive legislation against illegal immigration and cut public benefits for legal residents in 1996. In most respects, however, policy continued in the familiar expansionary direction.

In this context Australia presents an analytical puzzle and a theoretical challenge. Why did Australia reverse recent migration policy trends when similar impulses in the United States and Canada were defeated? Rather than attempt a comprehensive answer, I will explore the three cases with the goal of evaluating the potential of alternative theories. Due to constraints of space I only summarize the important policy developments in the three cases (For more detail, see Freeman, 1998a, 1998b, 1999, 2000 and Freeman and Birrell, 2000) and deal with only selected hypotheses.

USA

Contemporary immigration policy in the United States can be traced from the passage of legislation in 1965 that ended the national origins quota system and made family connections the central vehicle for entry. Annual admissions grew steadily and source countries shifted from Europe to Asia and Latin America. The legal immigration program became highly institutionalized and mostly non-controversial, even as opinion polls showed majorities opposed to a larger flow. The most politically salient immigration problem was dealing with the flows of “undocumented” migrants mostly from Mexico. Legislation in 1986 sought a middle ground by imposing sanctions on employers who “knowingly” hire unauthorized workers and granting amnesty to around three million persons who had been residing illegally in the country since 1982. In 1990 annual admissions were raised by about one-third, pushing them to near historic highs by the mid-nineties. Meanwhile, employer sanctions had failed to deter illegal entries, which were estimated to be running at 275,000 per year. The Immigration and Naturalization Service (INS) put the total undocumented population at five million in 1996.

Several developments set the context for policy in the late nineties: the campaign for Proposition 187 in California, the Republican takeover of both Houses of Congress in the 1994 mid-term elections, the surprisingly critical reports of the United States Commission on Immigration Reform between 1994-97, and the presidential campaign in 1996 of Patrick J. Buchanan. The stage appeared set for comprehensive changes in the U.S. immigration program. Because the period since 1994 has been portrayed in the press and by some academic observers as an era of restrictionist backlash against immigrants, it is important to consider what actually happened. Many restrictionist proposals were touted, a number of which were embodied into House or Senate bills. Most were directed at illegal aliens but others would have slashed the
numbers of legal immigrants granted visas each year. Only a handful of these proposals survived the tortuous American legislative process. Nevertheless, by the end of 1996 three laws had been adopted which had significant restrictive implications for immigration. These included a commitment to new powers and increased spending to prevent illegal entry, unprecedented limits on access of legal immigrants to publicly funded benefits, new terms under which legal immigrants could sponsor relatives, expanded deportation powers, and expedited asylum procedures.

Although President Clinton signed all three bills into law, he opposed many of their provisions and vowed to work for their repeal. After winning re-election in 1996 he made good many of these promises. During 1997 and 1998 many of the restrictive provisions enacted in 1996 were either delayed, watered down, or rescinded by the Congress, the president, or the federal courts or their effects were mooted by compensatory actions taken by the states. In addition to these reversals of policy, a number of other episodes involving temporary agricultural workers, Central Americans and Haitians in the U.S. under temporary protected status, undocumented persons seeking to change their status to permanent resident under special provisions of the law permitting this to be done from within the United States, and the expansion of the temporary skilled worker (H1-B) program, all suggested that the expansionist logic of U.S. policy was still alive. Moreover, the federal government launched a concerted effort to facilitate the naturalization to citizenship of the millions of permanent residents who had lived in the United States for at least five years. Citizenship, of course, would restore eligibility for the full range of public benefits. Naturalizations swelled to record numbers.

Australia

The immediate background to immigration policy change in Australia in the nineties can be traced to the Liberal/National Coalition government in 1975. The Coalition revived the immigration program that had been cut by two-thirds by the 1972-75 Whitlam Labor government, giving priority to skilled tradesmen, technicians, and professionals. A new system of selecting skilled migrants was instituted and skilled migration increased in the late 1970s but as a part of the family reunion and humanitarian categories. The Fraser government also relaxed the restrictions the preceding Labor government had imposed on the sponsorship of non-dependent parents and siblings and more distant relatives by restoring some sponsorship rights for relatives in the second family category (Birrell, 1990: 2-3). The Hawke government, which took office in 1983, added further concessions for those sponsored by Australian-resident siblings (by minimizing the skill requirements of those sponsored) and by allowing virtually unrestricted entry to those sponsored as parents, regardless of their age or number of children living in Australia. Meanwhile, in the face of a deep recession in the early eighties, the government restricted skilled migration. The result was that in the first half of the 1980s the Australian migration program looked quite like that of the U.S.A. with its emphasis on family reunion.

In the wake of the first serious debate about the challenge immigration implied for traditional views about the nature of the Australian community and identity in 1984, the Hawke government sought to legitimize the migration program on the basis of the contribution that skilled and entrepreneurial migrants could make to Australia’s economic vibrancy. Opportunities
for business migrants were expanded and a new independent category for skilled entries was created. By 1991 some 31 percent of all persons with degree qualifications in Australia had been born overseas. In many technical professions the figure was above 40 percent.

Leading commentators observed at the time that “there was a certain unstoppable momentum” behind the program (Castles, et al., 1992: 169). This seemed plausible as high migration was strongly supported by the ethnic community and the intelligentsia. There was some controversy over the social and cultural costs of migration, but the Labor government seemed intent on pushing ahead. Migration was a key component of Labor’s strategy for integrating Australia’s economy with the booming Asian marketplace. The embrace of multiculturalism was seen as an requisite to the success of this strategy (Garnaut, 1990).

Nonetheless, during the next decade this policy trajectory was first slowed and then at least temporarily reversed. Surprisingly, both the Keating Labor government and the Liberal-National Coalition that took over in 1996 participated in this effort. One factor in the general rethinking was a report by a blue-ribbon government committee released in 1988. Convened by the Labor Government, the Committee to Advise on Australia’s Immigration Policy was, nonetheless, critical of some aspects of the immigration program, especially multiculturalism (CAAIP, 1988). Then the cross-party consensus that had buttressed expansive immigration policies began to unravel. Furthermore, economic conditions became less favorable to migration with a deep recession in the late eighties and early nineties suggesting to some that migration might threaten jobs and burden the treasury in a time of declining revenues.

Policy consequences followed in rapid succession. An important administrative measure which was to lay the groundwork for the control measures of the 1990s had been put into place in the late 1980s. In order to reduce the influence of the courts in overseeing its immigration policy decisions the Immigration department reorganized its regulatory structure in 1989 so as to minimize the scope for applicants, their lawyers and the courts to evade the policy’s intent. It did this by removing as far as possible any scope for administrative discretion on the part of decisionmaking officers, or by the courts in interpreting these officers’ decisions, by detailed specification of all departmental regulations. These regulations, in turn, were given the status of law by incorporating them into acts of parliament.

Overall admissions were cut substantially in the 1990s. Permanent arrivals (a category that includes New Zealanders who are unrestricted) had reached a peak of 145,316 in 1989. The figures dropped sharply thereafter and were at about 80,000 by the end of the decade (ABS, 2000, Table 1.7). To assert control over the family reunion category, Labor passed a Balance of Family rule in 1989 that required that more than half of a family’s siblings had to be residing in Australia before a child could sponsor the migration of his or her parents. The numbers of sponsorships of parents did decline but began to rise again in the mid-nineties. In 1997 the Coalition (with Labor support) placed a quota on the number of parents permitted to enter each year (Birrell, 1997: 24). The Government then cut visas for parents from 7,580 in 1996-97 to a planned 500 in 1999-2000. The numbers of spouses and fiancés entering annually has been down.
since 1995-96. The Coalition failed in its attempt to pass a cap on spouse visas, but did cap fiancés (down about 50% from their peak). Spouse visas are now limited to two years, pending subsequent proof that the relationship is “genuine and continuing.” The numbers of independent skilled migrants were also reduced. The Business Migration Program was effectively scuttled and renamed the Business Skills category in 1991-92. The concessional category was removed from the family stream and folded into the skilled program.

The Immigration department narrowed the basis for making on-shore humanitarian claims to keep the courts out of the process. The 1992 Migration Act, passed under the Keating Labor Government, gave the department the power to detain all persons in Australia without authorization. Rights of appeal of initial decisions were drastically reduced. The Coalition (with Labor support) limited refugee status to three years and placed strict limits on access to welfare, family reunion, and re-entry if one departed Australia in that time period.

Successive governments in the 1990s wound back access to welfare benefits. The Labor government imposed a two year bond on the sponsors of parents (A$3,500 for the principal applicant) which was repayable if no social security benefits were paid out during the time of the bond. In 1994 Labor implemented a moratorium on the payment of most social security benefits for the first six months of residence for all migrants except those entering under the humanitarian categories. In 1996 the Coalition government (with Labor support) extended this moratorium to two years. In 1999 the moratorium was applied to New Zealanders. Some other migrant services, such as Adult Migrant English training courses were put on a user pays basis. These measures were justified in fiscal terms and carried out by the Department of Social Security, but they were seen by ethnic leaders as part of the reform of the immigration process.

Finally, the strong commitment to support of multicultural activities, a mark of the Labor Government in the late eighties, waned. In 1996 the Office of Multicultural Affairs, which had been established in the late 1980s, was abolished, its activities being placed in the Department of Immigration. In addition, the Bureau of Immigration, Multicultural, and Population Research, which had played an important role under Labor in providing research supporting a large immigration program, was also shut down.

Canada

Shortly after the 1993 election the Progressive Conservative government instituted some of the most significant immigration policy changes in the whole postwar period, launching an immigration review that led to steadily rising admissions without regard to fluctuations in the unemployment rate and enhancing the role of economic over family and humanitarian entries. When they were returned to office in 1988 the PC announced the first Five Year Plan for 1991-95, calling for 215,000 new admissions in 1991 and 250,000 for each year between 1993 and 1995. As Veugelers and Klassen show, “there is a post-1990 break in the historical linkage of immigration and unemployment trends. This break implies that in 1990 the Canadian state abandoned a longstanding commitment to protecting labour in its immigration policy” (1994: 359). The Conservatives had been raising the number of visas available to economic migrants
gradually since 1985. A House of Commons report released in the same year argued that overall admissions should be set to correct the demographic imbalance between young and old in the Canadian population. At the same time the government limited family reunion for some unmarried children and levied a $500 application processing fee on landed immigrants. When Kim Campbell replaced Mulroney as Prime Minister her government introduced Bill C-86, a cluster of measures designed to give the bureaucracy more effective control over the annual flows, that was adopted by Parliament in February 1993.

The 1993 election brought about an upheaval in the Canadian party system. The Liberals were the principal beneficiaries of these changes, winning 177 seats and forming the new government. According to Nord, “it was clear from the outset that the new Liberal Minister of Immigration believed that his party had been given a mandate by the Canadian people to broaden the nation’s commitment to receiving immigrants and refugees form abroad” (1997, p. 155). In particular, Sergio Marchi, the new Minister of Citizenship and Immigration, indicated that he intended to push ahead with the goal of a one percent annual immigration target and called for an immigration policy review (p. 156). An eight-months consultation process began in March 1994. Working groups were established to report to the Minister by early summer. These were followed by public consultations and bilateral negotiations with provincial officials.

By November, 1994 the political environment had clearly shifted. The Government’s immigration plans as articulated in the immediate aftermath of the electoral victory encountered unexpected resistance and the 1995 planning document was a modest response to it (Nord, p.156). It called for a reduction in the family category, changing the points system to emphasize job and language skills, broadening opportunities for independent migrants, and investigating welfare abuse and crime. The Government was still committed to the one percent goal but the new targets for 1995 were 50,000 less than in 1994. In other words, the Minister seemed to be backing away from the recommendations of his own policy review. When the Liberals won reelection in 1997, the Minister for Immigration, Lucienne Robillard, released the report of the Legislative Review Advisory Group (LRAG) (Citizenship and Immigration Canada, 1998) and announced a five day consultative process to survey the opinions of interested parties and stakeholders. Time was at a premium, she noted, because she wanted to bring in new legislative proposals as soon as possible. The LRAG recommendations were hardly radical, but they did reflect the view that aspects of Canadian policy needed reform.

But it was not until one year later, January 6, 1999, that the Minister released her department’s response to the LRAG and to the opinions canvassed during the formal consultation process and thereafter (CIC, 1999). Building on a Strong Foundation for the 21st Century represented a substantial retreat from the views of the LRAG. It is noted, for example, that during the consultation process with 115 organizations and individuals and with over 2,000 written submissions, considerable disagreement with the LRAG report came to light. In particular, many of those consulted believed that the current system does not require the “fundamental redesign” advocated in the report, perceived the report as having an “economic, market-oriented focus,” found it “negative and problem-oriented in tone”, thought the proposed
solutions were not always “consistent with the declared values-based approach,” and expressed a desire for “further consultation as the government develops its legislative reform package.” The new report outlined a broad range of changes across the gamut of immigration categories and issues. Among these, it promises legislation that will enhance, not diminish the family class by raising the age limit for a dependent child by raising the age limit from 19 to 22 and allowing for exceptions for children even older. In addition, the law will recognize common-law and same-sex relationships for purposes of family reunion. With respect to the skill category selection will be modified to focus on flexible skills rather than qualifications to fill identified niches. A reasonable interpretation is that these proposals represent less the views of the LRAG or of the professionals in CIC than those of the immigration community and stakeholders whose voices were canvassed in the time between January 1998 and January 1999.

The differences in policy trends in the Australia, Canada, and the United States are summarized in Table 3.

<table>
<thead>
<tr>
<th>Policy</th>
<th>United States</th>
<th>Australia</th>
<th>Canada</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Admissions</td>
<td>Up by one-third</td>
<td>Down by 40%</td>
<td>Down by 30%</td>
</tr>
<tr>
<td>Family migration</td>
<td>Income of sponsors “deemed” but all family preferences remain</td>
<td>Sponsors must post bond; Balance of Family rule; annual cap on parental sponsorships and fiances; spouse visas limited to 2 years initially</td>
<td>Limit definition of family for sponsorship; $500 cost recovery fee; adult children sponsorship eased</td>
</tr>
<tr>
<td>Skilled Migration</td>
<td>Occupational category increased in 1990</td>
<td>Independent category reduced, points test tightened to require English test, preference to those educated in Australia</td>
<td>Second five yr plan tightens skill criteria;</td>
</tr>
<tr>
<td>Refugee/Humanitarian</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>–Off-shore</td>
<td>No changes</td>
<td>Limit refugee visas to 3 years with severe limits on access to welfare, family reunion, and travel overseas.</td>
<td>No major changes</td>
</tr>
<tr>
<td>–On-shore</td>
<td>Temporary protected status granted to Central Americans and Haitians extended and then converted to permanent status; asylum seekers can be excluded if no credible case or if arrive with no documents or enter illegally</td>
<td>Reduced scope for filing on-shore humanitarian claims; reduced grounds of appeal against a negative decision;</td>
<td>Generally lenient adjudication</td>
</tr>
</tbody>
</table>
Temporary Work Visas | Temporary skilled worker program expanded; | Annual cap abolished for Employer Nomination Scheme, business skills migration, and distinguished talent in 1996; have no welfare entitlements and can’t normally switch employers. |
---|---|---|
Migrant Welfare Benefits | Most federally-funded means-tested benefits denied those entering after 1996 except for exempt categories (ie refugees); income of sponsors of family members is “deemed” (see above) | Sponsors must post bond for parents (see above); 2 year moratorium on welfare benefits for all migrants; No change |
Illegal Migrants | Vast expansion of men and materiel to control border; entry with false documents debars entry for 5 years; pilot program for employer verification of work authorization | 1992 Migration Reform Bill gives power to detain all persons illegally in country; Border and port of entry measures; |
Multiculturalism | No formal policy; affirmative action for immigrants sustained | Eliminate Dept of Multicultural Affairs and Bureau of Immigration Research Give ‘stakeholder’ groups formal consultation role |

As can be seen, Australia appears to be headed in the opposite direction of the U.S.A. and Canada on the issue of numbers and with respect to family, skilled, and on-shore asylum claimants. Policy toward illegal migrants has become considerably tougher in the U.S.A. and Australia, if not in Canada, but Australia’s stance is more severe in most respects. Both Australia and the United States have taken steps to limit migrant use of public benefits, but the U.S. initiative has been to some considerable extent blocked or reversed. All three have expanded access for temporary skilled migrants, though the U.S.A. and Canada have imposed fewer protections for national workers. Having no formal multicultural policy the U.S.A. has taken less visible steps than Australia or Canada in this arena. The picture is, therefore, mixed and it is impossible to state how permanent present trends will prove to be. Nevertheless, the evidence justifies the conclusion that the U.S.A. and Canada are continuing on the expansionary path whereas Australia has diverged. Why?

Theory and Comparative Migration Politics

It is important to note that the nature of what may be called the immigration situation or problematique of the three countries, though exhibiting broad similarities, are in some respects quite distinct. This, in itself, may account for some of the disparity between them. All the rich countries of the world are experiencing intensifying migration pressures and this is true of non-
western and well as western countries. Nevertheless, some countries are more susceptible to migration pressures than others. The United States is much more open to migration pressure than Australia and significantly more due to its land borders with and close proximity to sending countries and the powerful pull its economy and culture exerts on the world’s potential migrants. The booming American economy only adds strength to existing pull factors. Moreover, its image as a land of opportunity for immigrants is central to its role as a global power. Australia is also an attractive destination and is situated in the vicinity of some of the largest population centers in the world, but it is often a second choice for migrants preferring to go to America or Canada, which can be a transit point en route south, and its island status gives it a huge advantage in controlling unwanted entries. On the other hand, Australia’s ability to run its immigration policy as it sees fit is constrained by the perceived necessity to take into account the reactions from its Asian neighbors with whom its hopes for economic growth are intertwined. Nevertheless, Australia is probably more favorably situated vis-a-vis external considerations than the United States or Canada to control migration if the government chooses to do.

**Political Economy**

Political economy generates hypotheses too numerous to consider here. I will discuss only one issue: where do the three cases fit within the cost/benefit framework drawn from Wilson and Freeman and what if any changes have occurred in the nineties?

Broadly speaking, client politics continues to hold sway in the United States, is becoming more rather than less prominent in Canada, but has been stymied, temporarily at least, in Australia. The client mode is well-established in the U.S.A. and able to override the populist challenges of the nineties with the important exception of policies toward illegal migration and the loss of some welfare benefits for legal immigrants. No real constituency developed against the legal program. New actors, especially high tech employers, entered the arena in a striking way. There was also a resurgence on the part of agricultural growers who appear likely to obtain a new agricultural guestworker scheme. This confirms the logic of the model which argues that those benefitting concretely from a policy will overcome obstacles to organization more effectively than those who suffer its costs. There is evidence that where costs are clearly concentrated, as in California which is the site of the largest illegal population, migration does generate protest. And concern about California obviously played into the decision of a Democratic president to sign bills he opposed. But the problems of California did not translate into a national constituency and, in any case, deal only with illegal migration. The American landscape has undeniably changed in the last few years. A populist element has been introduced into immigration politics. For the moment, however, client politics continues to prevail as the dominant mode, restrictive proposals that deal with legal immigration rarely pass, and expansionist policies continue to be adopted.

Canadian immigration policy has traditionally been managed by the state in relative isolation of strong pressures from social groups (Brodie and Gabriel, 1998; Hardcastle, et al., 1994; Holton and Lanphier, 1994; Hawkins, 1972, 1989; Dirks, 1995; Suyama, 1994). The major political parties in Canada—the Liberals and the Progressive Conservatives—have been in essential agreement over immigration and multiculturalism throughout most of the postwar era. This
consensus involved a largely open immigration policy, both in terms of the national-origin groups being admitted and in terms of numbers. Opinion polls indicate that the general public was lukewarm when not opposed to these policies, but was not mobilized and the parties avoided discussion of immigration at election time. This produced two results. First, policy was largely constructed inside the ministries and by the cabinet officials with formal responsibility. The objectives of policy were not sharply articulated but were associated with economic and population growth, linked vaguely to a “nation-building agenda” (Hardcastle, et al., 1994). Throughout this period (until 1990), annual admissions were closely tied to labor market conditions. The main social partners who might have clear stakes in immigration decisions, employers and trade unions, were mostly quiet and were followers rather than leaders (Veugelers, 2000). The second result of this context was, however, that the Liberal Party gradually became the de facto party of ‘ethnic’ Canadians and proprietor of the immigration and multiculturalism programs. Ethnic organizations, church groups, and refugee service and advocacy agencies came to be designated as “stakeholders” with a privileged role in advising and criticizing in the formulation of Ministerial proposals (CIC, 1999). In other words, the cross-party consensus to bury immigration as an explicit vote-getting issue did not drain it of its electoral power. The Liberals benefitted from the immigration consensus at the expense of the Conservatives. In other words, this was a weak form of client politics or possibly majoritarianism without a majority.

The most important new element in the immigration context is, of course, the Reform Party. Reform shares many characteristics with populist parties of the right that have emerged in almost all western democracies in the eighties and nineties to challenge the mainline parties (Betz, 1998; Betts, 1999). Immigration and multiculturalism was a hot-button issue for Reform and for its supporters. What has been the impact of Reform on the immigration agenda in Canada? Reform first contested parliamentary seats in the 1988 election and though it took a non-conventional position on immigration made little reference to it during the campaign. Immigration was a slightly more important issue in the 1993 election, but by 1997 Reform had noticeably backed off the topic. Basically, the party discovered that the price of challenging the immigration and multiculturalism orthodoxy was high. The negatives associated with being labeled extremist or racist, and the subsequent scandals involving Reform candidates going over the edge on the issue, outweighed the undeniably positive response anti-immigrant positions evoked from portions of the electorate. The stunning breakthrough of Reform in 1993 at first appeared to have left the new Liberal government undeterred. Then for a while it looked like the Liberal government might enact a number of restrictive measures. But this did not happen and the 1999 decisions commit the government to continuing openness, rising numbers, and more consideration of the wishes of immigrant-advocacy groups.

Australia, as I have argued, established a flourishing form of client politics in the eighties, but it was put on the defensive surprisingly easily by the populist uprising that had been building gradually but came to a head in the spectacular, if short-lived career of Ms. Pauline Hanson and the One Nation Party she founded. The populist movement against immigration and multiculturalism was much stronger than in the United States, where it was mostly limited to California, and in Canada, where Reform paid little attention to immigration. The policy response
of the state was, moreover, much more decisive and thoroughgoing. Client groups in Australia were fairly routed and were unable to defeat retrenchment. The emergence of populism suggests that the perception that immigration is costly grew markedly in Australia in the nineties. How this happened is a subject I will return to momentarily.

**Institutionalism**

I want to consider two aspects of institutionalism: (1) the idea that the embedded liberalism of contemporary democratic regimes produces a rights-based politics of migration that constrains the ability of states to control it, and (2) the possibility that variation in the decisionmaking structures of different states affects the content and mode of policy. A review of the three cases suggests that the embedded liberalism thesis may have been overstated. A liberal politics of rights is strongly embedded in the United States, and it is significant in Canada, but it seems much weaker in Australia. Moreover, governments in the latter have shown a surprising ability to avoid the creation of new rights and even to roll back some that already exist.

The U.S.A. has a strong and long-standing liberal tradition (Hartz, 1955), a Bill of Rights that enjoys constitutional priority in American jurisprudence, and strong judicial review. The U.S.A. is a signatory to UN Convention of refugees and a leading player in international fora having to do with human rights. American law and practice were profoundly affected by the civil rights movement of the 1960s. Directed at the historical discrimination against African-Americans, civil rights law and language has been extended to women, other ethnic and immigrant minorities, homosexuals, the disabled, and other groups. Affirmative action policies and formal and informal quotas for privileged minorities abound, all justified through the rhetoric of rights under the Constitution. Immigration policy since 1965 has been directly affected by the civil rights revolution and the 1964 Civil Rights Act and 1965 Voting Rights Act. A powerful legal establishment is highly influential in the immigration policy process. A highly litigious culture, the United States has a long tradition of organized interest groups petitioning the government for redress of grievances and payment of tribute. A culture that traditionally embraced limited government has recently developed a patina of serious anti-government animus, animus that constrains the ability of law enforcement agencies like the immigration service to function effectively.

Canada did not develop the forms of extreme individualism that prevailed south of the border. Nevertheless, because of the cleavage between the English-speaking majority and the Francophone minority in Quebec, the question of individual rights and the collective rights of social groups has been paramount. As Weaver (1992) remarks, the French speakers feared being oppressed by the majority while the Anglophones were apprehensive that the linguistic cleavage, if sharpened, might threaten national unity. The result was a tendency of both sides to downplay the majoritarian features of the political system and build in a number of consociational, arbitral, and decentralizing institutions and processes. The presence of the French-speaking minority also led to the adoption under Prime Minister Trudeau of a formal policy of multiculturalism, once that was more or less easily adapted to incorporate the cultural aspirations of migrant groups. Canada has also, as a middle power, placed considerable emphasis on its non-combat role in international
affairs, especially its generous policy of accepting and advocating for refugees.

There is no strong liberal tradition in Australia, a country founded out of a working class fragment of British society according to Hartz (1964) and one that did not produce a strong middle class of business entrepreneurs in the American style. The Liberal party was established after WWII by Robert Menzies, but is was not based on individual rights in the European liberal tradition. The party represented business interests, but did not embrace *laissez faire*. Rather, it oversaw the policies of protectionism, limited but effective welfare, immigration restriction, and wage arbitration that were the lynchpins of the Australian political economy until the early 1980s. There is a strong sense of collective identity in Australian culture that overrides individual rights. This tradition is embodied in a strong state that provides protection, a legacy of early settler struggles with a harsh, isolated environment. The Australian constitution contains no bill of rights and the country has undergone no civil rights movement, though a feeble facsimile mounted by Aborigines has been underway for some time. Nevertheless, since the 1960s a discourse of rights associated with rise of what some analysts refer to as the “new class” (Betts, 1999) has become prominent. The Labor government of the eighties established a Human Rights and Equal Opportunity Commission. Anti-discrimination legislation protects individuals against discrimination based on race, descent, color, and national origins. Judicial review exists, and is becoming more common, but has been mostly insignificant historically. Nevertheless, one observer argued in 1992 that the courts were more influential over Australian immigration policy than the courts were in the United States (Birrell, 1992).

The main tendencies of immigration policy in the three countries in the nineties is consistent with the conclusion that rights are most firmly entrenched in the American setting, less so in Canada, and least in Australia. The American government, to cite just a few examples, failed in an attempt to retrench on rights of family reunification, extended temporary protected status to additional nationality groups when charged with discrimination, made temporary status permanent, and reversed most of the decisions limiting access to public benefits for those immigrants already receiving them. The Canadian government announced its intention to limit rights of family reunion, but after a year of consultations decided to expand them. It has consistently rendered extremely generous rulings on the bases for eligibility for asylum. Australia is the only country of the three that seems relatively unbound by path dependency. Family reunion rights were sharply reduced, welfare access was limited, broad powers of detention of illegals were granted and implemented, administrative reforms were deliberately fashioned to stymie judicial oversight, and highly visible symbols of multiculturalism were eviscerated.

I conclude with a few merely suggestive comments about the political institutional structures of the three countries. However the costs and benefits of immigration are distributed, whatever mix of interest groups lobbies for policy change, no matter the cultural values that impinge on attitudes toward migration, policy is made by authoritative decisionmakers. The information, pressures, and opinions they bring to the table are in the end decisive. A key question, then, is how immigration policymaking is organized and how open the decision process is to influence from private sources. All three of the countries under consideration are liberal
democracies, all descended from the British parliamentary, common law tradition. All are federal systems. There the similarities end. Indeed, there are striking differences among them in the organizational framework within which migration policy is forged.

Citizenship and Immigration Canada (CIC) is, as with other matters, midway between the highly effective Australian department and the weak INS. CIC is less centralized in part because Canadian law gives the provinces remarkable say over migration decisions. The courts are more intrusive in Canada than in Australia. Ministers have had mixed success in recent years. Several have had to make embarrassing about faces when confronted with political opposition to their proposals. On the other hand, until recently the consultation process by which public input was solicited was nearly completely stage managed. Moreover, Veugelers (2000) executed a careful case study of the Mulroney government decision to push immigration admissions up in spite of high domestic levels of unemployment and to increase the share of “independent” (economic) migrants relative to the family and humanitarian categories, a move that would have certainly generated conflict in both Australia and the United States. In Canada, neither business nor labor took clear positions or exercised significant influence over the decisions. Immigration was a secondary issue over which their membership was divided. Moreover, they tended to take a “sectoral” view of immigration, ignoring broader and longer-range questions in favor of those aspects of immigration that affected particular classes of businesses or workers. Veugelers claims that “dominance in the field fell by default to the state” (p.13). Within the state, he gives primary credit to senior officials within the state ministries for developing the main outlines of an argument for the longer-range policy and to elected politicians at the top of the Progressive Conservative Party for seeing the policy as providing “political advantages of establishing stronger links with ethnic communities” (p. 13). In other words, the search for ethnic votes was an incentive for a more expansive immigration policy, but there was little ethnic group pressure, per se, exerted at the time. In conclusion, Veugelers observes that “immigration can be interpreted as a regulatory sphere in which the possibility of offending business did not place any important constraints on the state” (p. 13).

In the United States immigration policy is made either in the White House or in the Congress. Typically, the INS plays a marginal role of providing data. Although under Doris Meissner the agency has improved its ability to do research and make strategic decisions, and has had its budget massively increased, its structural problems remain. The agency is a unit within the Justice Department. The Attorney General has many other matters to deal with and unless there is a crisis pays little heed to immigration. Congress sets immigration policy, including its minute details in legislation. Whereas in both Canada and Australia the annual admissions figures are determined in cabinet on the basis of departmental recommendations, American admissions are carved in stone in legislation. The congress is a highly permeable body and advocacy groups contend for access and influence. It would be difficult to imagine an arrangement more conducive to client politics, with interest groups capturing specific aspects of policy that affect them and it would be surprising if that were not the predominant mode of decisionmaking.
Conclusion

Political economy and institutional approaches to theorizing immigration politics are not mutually exclusive. Both have strong plausibility. Much work is left to be done in laying out the assumptions and hypotheses of each approach. These must then be tested against a wide range of cases. One potential problem with the idea of embedded liberalism is that, rooted as it is in the evolution of western nations, it is not clear what relevance it has to non-democratic political systems. The literature on comparative immigration politics is overwhelmingly western in focus. Non-western countries are often treated only insofar as they serve as sending areas. The appearance of the Asian and Pacific Migration Journal is a welcome development in this context. But what is desperately needed is work that not only systematically compares a wider range of liberal democratic states but work that compares those states with the newly democratizing countries such as Korea, Taiwan, Thailand, and Malaysia.
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