

# The causes of convergence in Western immigration control

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**Abstract.** In recent years, some scholars have argued that there has been a convergence of the immigration control policies of the industrial democracies. This article demonstrates that, in fact, there has been an extraordinary similarity among the immigration control policies of the major receiving countries for over a century. It examines six alternative explanations for these similarities in immigration control policies: (1) a global hegemon that forces or persuades various countries to act in unison; (2) global or regional migration regimes and organizations; (3) interdependence between the immigration control policies of various countries; (4) emulation of immigration control policies of one country by other countries; (5) the world system approach; and (6) interdependence between the socioeconomic and foreign policy factors that lead to immigration control policies. The article argues that it is the last factor that explains most of the similarity among the immigration control policies. It demonstrates how global economic cycles, shared migratory pressures, alliances that produce common foreign policy considerations, wars that receiving countries are involved in and global ideological cycles produce the convergence of immigration control policies in various receiving countries.

In recent years, some scholars have argued that the immigration control policies of the industrial democracies are converging. A conference of 70 leading American and European researchers and policymakers, held in Charleston, South Carolina, focused on 'European-American Immigration Convergence'.<sup>1</sup> The recent book of Cornelius, Martin and Hollifield, *Controlling Immigration: A Global Perspective*, explores the convergence hypothesis, which asserts that the industrial receiving countries use increasingly similar policy instruments to control immigration.<sup>2</sup> And Jonas Widgren argues that there is a convergence in both the policies and practices of all the rich industrial democracies in regard to asylum seekers and illegal immigration.<sup>3</sup>

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<sup>1</sup> P.L. Martin and M.J. Miller, 'European-American Immigration Convergence: A Conference Report', *International Migration Review*, 28:3 (1994), pp. 591–4.

<sup>2</sup> W. Cornelius, P. Martin, and J. Hollifield (eds.), *Controlling Immigration: A Global Perspective* (Stanford: Stanford University Press, 1995), p. 3.

<sup>3</sup> J. Widgren, *The Key to Europe: A Comparative Analysis of Entry and Asylum Policies in Western Countries* (Vienna: International Centre for Migration Policy Development [ICMPD], 1994). In addition, Patrick Ongley and David Pearson describe a pattern of convergence between the immigration control policies of New Zealand, Canada and Australia in 'Post-1945 International Migration: New Zealand, Australia and Canada Compared', *International Migration Review*, 29:3 (1995), pp. 765–93. Carol Schmid notes the convergence between the immigration control policies of West Germany and Switzerland with respect to migrant workers in 'Gastarbeiter in West Germany and Switzerland: An Assessment of Host Society Immigrant Relations', *Population Research and Policy Review*, 2:3 (1983), pp. 233–52.

I contend that there is nothing new about parallels among the immigration control policies of Western industrial receiving countries. In fact, there has been an extraordinary similarity among the immigration control policies of the major receiving countries for over a century. The article first demonstrates these commonalities, based on a study of the immigration control policies of nine receiving countries—Australia, Britain, Canada, France, Germany, the Netherlands, Sweden, Switzerland, and the United States—since the 1870s, with some reference to earlier periods. It then examines alternative explanations for these commonalities.

In order to clarify the focus of the article, two parameters should be noted. First, the article focuses on immigration control (that is, the rules and procedures governing the selection and admission of foreign citizens) rather than on immigrant policy or immigrant integration (that is, the conditions provided to resident immigrants).<sup>4</sup> And second, some studies deal with convergence in the sense of an unplanned similarity of reactions to similar problems, while others do so in the sense of a conscious search for harmonization. This article emphasizes the former meaning of the term, but the latter meaning is also dealt with in the context of international organizations.

### **Global similarities in immigration control policy**

The immigration control policies of the major receiving countries have been extraordinarily similar with regards to their content and timing. Often, similar policies were inaugurated in a variety of countries within a period of one or two years:

- Between the 1770s and the 1870s, immigration was practically unrestricted in most receiving countries, and some of them lacked the capacity to control immigration. Britain, the United States, Canada (Nova Scotia), Switzerland and France regulated immigration in the 1790s. Britain and the United States regulated immigration, or attempted to do so, in the late 1840s.
- During the 1870s–80s, Canada, Germany, New Zealand, the United States, and several Australian states restricted Chinese and/or other labour migration.
- Between 1890 and World War I, Australia, Britain, Canada, France, Germany, Sweden, and the United States attempted to block Eastern European and impoverished immigration, restricted Japanese immigration and/or regulated temporary labour migration. These restrictions and attempted restrictions intensified from 1894 to 1897, and from 1905 to 1908. In contrast, no major restrictions were imposed from 1898 to 1904 and from 1909 to 1913, with the exception of the 1901 Immigration Restriction Act and the Pacific Island Labourers Act in Australia, which corresponded to state acts passed earlier, and an Order in Council of 1910 in Canada.
- World War I had a dual impact on immigration control policy. On the one hand, receiving countries limited permanent immigration and restricted former immigrants. On the other hand, the receiving countries expanded the recruitment of migrant labour.

<sup>4</sup> On the difference between immigration control on the one hand, and immigrant policy or immigrant integration on the other hand, see T. Hammar (ed.), *European Immigration Policy* (Cambridge: Cambridge University Press, 1985), pp. 7–9; J. Money, 'No Vacancy: The Political Geography of Immigration Control in Advanced Industrial Countries,' *International Organization*, 51:4 (1997), p. 687.

- Between 1919 and 1924, Australia, Britain, Canada, Germany, the Netherlands, Switzerland, and the United States severely restricted immigration.
- Between 1925 and mid-1928, the major receiving countries passed little immigration legislation.
- Between 1929 and 1935, Australia, Canada, France, Germany, Switzerland, and the United States restricted immigration and/or stopped recruiting migrant workers.
- Between 1936 and 1938, major receiving countries did not adopt new immigration control policies, but rather continued to apply restrictions imposed earlier. Several countries even implemented more liberal policies.
- World War II, like World War I, had a dual impact on immigration control policy. On the one hand, receiving countries expanded the recruitment of foreign labour. On the other hand, the receiving countries strengthened their controls on permanent immigration, and some of them interned aliens from enemy countries.
- Between 1945 and 1972, with the exception of 1966–68, Western European countries first accepted permanent immigrants (mainly from their colonies or former colonies) or refugees, then recruited large numbers of migrant workers. The countries of permanent immigration—Australia, Canada, the United States and New Zealand, but not Britain—eliminated discriminatory policies against Asian, African and Eastern and Southern European immigration. Between 1966–68, Western European countries limited the recruitment of migrant workers, and strengthened their control over private recruitment. But later, between 1969–72, these measures were overlooked, and labour migration reached its peak.
- Between 1972 and 1974, Western European countries halted or sharply curtailed migrant labour recruitment. During the second half of the 1970s, these same countries encouraged former migrant workers to return to their home countries by offering them financial incentives, but to no avail. Australia also decreased its immigrant intake between 1971–75. In contrast, between 1975 and 1980, Australia, the United States and Canada accepted large numbers of Indo-Chinese refugees, the United States took in Cuban refugees, and the Netherlands admitted immigrants from Surinam and the Netherlands Antilleans. Also during the 1970s, the United States, Canada, France, the Netherlands and Sweden attempted to reduce illegal immigration.
- During the 1980s and the first half of the 1990s, all receiving countries attempted to halt illegal immigration and to reduce the number of immigrants granted asylum. The measures applied included stricter controls at the borders, penalties on employers of illegal immigrants, incarceration of illegal immigrants in camps and sometimes their deportation, as well as a reform of the asylum processing procedures. During the past three decades, Australia, Britain, Canada and the United States have also created point-systems or new categories which have given preference to immigrant investors, entrepreneurs and those with required skills.

### **Explanations for the similarities in immigration control policies**

There are six possible explanations for the similarities in immigration control policies of the major receiving countries:

- A global hegemon that forces or persuades various countries to act in unison.
- Global or regional migration regimes and organizations.
- Interdependence between the immigration control policies of various countries.
- Emulation of immigration control policies of one country by other countries (as well as the possible existence of an epistemic community in the field of immigration control policy).
- The world system approach.
- Interdependence between the socioeconomic and foreign policy factors that lead to immigration control policies.

I argue that it is the last factor that explains most of the similarity among the immigration control policies of the major receiving countries.

### *Hegemony and international regimes*

The hegemonic stability and the international regime explanations for immigration control policies are analysed in detail, and for the most part rejected, elsewhere.<sup>5</sup> The hegemonic stability theory is unsatisfactory in this context because no global regime of migration has emerged, and because the main regional regimes of migration—which are in Europe and Africa—do not involve the American hegemon. The regime theory is also wanting because: (1) there are no international regimes of permanent immigration; (2) the international regimes of migrant workers are mostly regional rather than inter-regional, and thus they control only a small fraction of international migration; (3) most international migration regimes did not exist prior to World War II, and thus they cannot explain the similarity among the immigration control policies during that period; and (4) most international migration regimes are inherently unstable, and thus they cannot explain long-term commonalities in immigration control policies.

Of the policies described above, international regimes can only shed light on immigration control policies within the EEC/EU, on policies dealing with immigration into the EU since the 1980s, and possibly on refugee policies. The EU facilitates immigration within the union, and provides EU citizens with certain social and political rights in the country to which they move. EU harmonization also speeds up and institutionalizes the convergence among the policies of the individual states towards immigration from outside the Union. But according to the model presented here, much of this convergence would have occurred even in the absence of international organizations, albeit at a slower pace, because the economies of these countries are similar and interdependent, and because they face similar migratory pressures.

<sup>5</sup> E. Meyers, 'European Immigration Regimes'. Paper presented at the Ninth International Conference of Europeanists, Chicago, 31 March–2 April, 1994; E. Meyers, *International Immigration Policies: A Political Economy Analysis* (Palgrave, forthcoming).

The refugee regime influences immigration control policies to a limited degree, but its norms do not compel countries to accept permanent residents.<sup>6</sup> Attempts by the ILO to affect immigration control policies with regards to migrant workers have failed. To some degree, the ILO influences policies on migrant workers already residing in the country of destination (for example, social security, trade union membership and cultural rights), but these relate to immigrant policy, which is not dealt with in this article.

### *Interdependence between immigration control policies*

Interdependence between the immigration control policies of various countries—notably between Canada, the United States and Australia—explains a few similarities between these policies. In particular, restrictions on immigration in one country have produced migratory pressures in other countries, which in response also restricted immigration. Canada restricted Chinese immigration in 1885 ‘to protect Canada against the backwash of the US [Chinese exclusion] legislation of 1882’.<sup>7</sup> During the turn of the century, ‘as the United States of America began to introduce qualitative tests, the Canadian Government felt constrained to do likewise’.<sup>8</sup> The 1921 and 1924 Quota Acts in the United States produced a surge in immigration to Australia from Southern Europe. This, in turn, led Australia to establish administrative quotas on immigration from Southern Europe. The McCarran-Walter Immigration Act of 1952 halted West Indian emigration to the United States, which contributed to the rise in West Indian immigration to Britain, and eventually led to the 1962 restrictions on New Commonwealth immigration.<sup>9</sup>

However, the evidence for interdependence between the immigration control policies of various countries is limited. This is quite apart from the fact that such a process requires some time: first, country A restricts immigration; second, the immigrants start converging on country B; and third, only when a substantial number of immigrants have arrived in country B, does it respond by restricting immigration. This prolonged process does not fit, for instance, the almost simultaneous restrictions on immigrants in 1914 or on migrant workers in 1973. So interdependence between immigration control policies only marginally contributes to the aforementioned similarity.

<sup>6</sup> See R. Plender, *International Migration Law* (Dordrecht: Martinus Nijhoff, 1988); K. Hartigan, ‘Matching Humanitarian Norms With Cold, Hard Interests: The Making of Refugee Policies in Mexico and Honduras, 1980–89’, *International Organization*, 46:3 (1992), pp. 709–30; C.M. Skran, ‘The International Refugee Regime: The Historical and Contemporary Context of International Responses to Asylum Problems’, presented at the annual meeting of the American Political Science Association, Washington DC, 31 August, 1991; C. M. Skran, *Refugees in Inter-War Europe: The Emergence of a Regime* (Oxford: Oxford University Press, 1995).

<sup>7</sup> Plender, *International Migration Law*, pp. 69–70.

<sup>8</sup> *Ibid.*, p. 74.

<sup>9</sup> Z. Layton Henry, *The Politics of Immigration* (Oxford: Blackwell, 1992), p. 31.

*Emulation of immigration control policies*

The emulation of immigration control policies also explains several similarities among these policies, especially with regards to skill-based selection systems. The Australian Structured Selection Assessment System (SSAS), introduced in 1973, the Numerically Weighted Multi-Factor Assessment System (NUMAS) points-system, introduced in 1979, and its modifications, were influenced by Canada's points system of 1967.<sup>10</sup> The US 1990 Immigration Act gave preference to skilled labour, professionals and investors, partially imitating Australia's and Canada's points-systems. It was suggested that Britain try to attract needed skills by following the lead of the US and Canada, and Britain created a new entrepreneurial business immigration category in 1994.

One reason immigration control policies are emulated might be the existence of an epistemic community. According to Peter Haas:

An epistemic community is a network of professionals with recognized expertise and competence in a particular domain and an authoritative claim to policy-relevant knowledge within that domain or issue-area. ... Members of transnational epistemic communities can influence state interests by directly identifying them for decision-makers or by illuminating the salient dimensions of the issue from which the decision-makers may then deduce their interests. The decision-makers in one state may, in turn, influence the interests and behaviour of other states, *thereby increasing the likelihood of convergent state behaviour* and international policy co-ordination, informed by the causal beliefs and policy preferences of the epistemic community.<sup>11</sup>

It is plausible that immigration control policy professionals in various countries share a set of normative and causal beliefs. For example, Dr. Peter Wilenski, a close advisor of Australia's Prime Minister Gough Whitlam and his Principal Private Secretary from 1972 to 1974, spent some time in Canada. He was particularly interested in Canada's manpower and immigration control policies, and thought that they might be a useful model for Australia's SSAS system, which was then in the planning stage.<sup>12</sup> Later, Professor Jerzy Zubrzycki, the Chairman of the Social Patterns Committee of the Immigration Advisory Council, studied Canadian selection procedures and took part in discussions concerned with the preparation of Canada's Green Paper on immigration control policy. His findings influenced the decision to replace the Australia's SSAS system with the NUMAS points-system.<sup>13</sup>

But again, the evidence for the influence of emulation of immigration control policies, and for the impact of an epistemic community, is limited. In addition, it has yet to be proved that the views of professionals determine immigration control policy, *as distinct from fundamental socioeconomic and foreign policy factors that are brought to bear through political channels*. For example, the Australian Population and Immigration Council produced the Green Paper of 1977, which led to major changes in immigration control policy, including an increase in the immigration intake. But in fact, Michael MacKeller, the Minister of Immigration who recon-

<sup>10</sup> F. Hawkins, *Critical Years in Immigration: Canada and Australia Compared* (Montreal: McGill-Queen's University Press, 1991), pp. 105, 144–45.

<sup>11</sup> P.M. Haas, 'Introduction: Epistemic Communities and International Policy Coordination', *International Organization*, 46:1 (1992), pp. 3–4.

<sup>12</sup> Hawkins, *Critical Years*, pp. 101–2.

<sup>13</sup> *Ibid.*, p. 142.

stituted the Council, had already suggested such an increase in 1976. In 1980, the NUMAS points-system was revised because of adverse public reaction to that system. Thus, in my opinion, professionals do not determine the basic trends in immigration control policy, and epistemic communities have little effect on such policies. The influence of professionals is mainly limited to technical aspects of immigration control policy, such as skill-based selection systems and mechanisms to prevent illegal immigration.

### *World system theory*

The world system theory appears to be a good explanation for similarities in immigration control policies. After all, it views all actors within the context of an overarching global structure. Immanuel Wallerstein's world system theory analyses the emergence of capitalism, and traces its development into a world capitalistic system that contains a core, a periphery, and a semi-periphery.<sup>14</sup> The core historically has engaged in the most advanced economic activities; the periphery has provided raw materials to fuel the core's economic expansion; and the semi-periphery is involved in a mix of production activities, some associated with the core and others with the periphery.<sup>15</sup> The world system theory also emphasizes the importance of long economic cycles.<sup>16</sup> Drawing upon Kondratieff's long cycles, Wallerstein adds a set of secular trends, which include physical expansion, commodification, and mechanization. Major changes in the system occur when these secular trends meet their natural limits and a major cyclical economic downturn occurs.<sup>17</sup>

Based on the work of Wallerstein, various theorists, including Ewa Morawska, Saskia Sassen, Alizabeth McLean Petras, and Alejandro Portes and John Walton, have linked the origins of international migration to the structure of the world market.<sup>18</sup> They argue that the penetration of capitalist economic relations into

<sup>14</sup> I. Wallerstein, 'Three Paths of National Development in the Sixteenth Century', *Studies in Comparative International Development*, 7:2 (1972), pp. 95–101; I. Wallerstein, 'The Rise and the Future Demise of the World Capitalist System: Concepts for Comparative Analysis', *Comparative Studies in Society and History*, 16:4 (1974), pp. 387–415; I. Wallerstein, *The Modern World-System: Capitalist Agriculture and the Origins of the European World-Economy in the Sixteenth Century* (New York: Academic Press, 1974); T.K. Hopkins and I. Wallerstein, *World-Systems Analysis: Theory and Methodology* (Berkeley: Sage, 1982).

<sup>15</sup> P.R. Viotti and M.V. Kauppi, *International Relations Theory: Realism, Pluralism, Globalism* (New York: Macmillan, 1987), p. 410.

<sup>16</sup> See T.K. Hopkins and I. Wallerstein, 'Cyclical Rhythms and Secular Trends of the Capitalist World-Economy: Some Premises, Hypotheses, and Questions', in Hopkins and Wallerstein, *World-Systems Analysis*, pp. 104–20; N.D. Kondratieff, 'The Long Waves in Economic Life', *Review*, 2:4 (1979), pp. 519–62.

<sup>17</sup> M.J. Miller and R.A. Denemark, *Migration and World Politics: A Critical Case for Theory and Policy* (New York: Center for Migration Studies [CMS], 1993), p. 11, based on Wallerstein and on Hopkins and Wallerstein. Also see E.M. Petras, 'The Global Labor Market in the Modern World-Economy', in M.M. Kritz, C.B. Keely, and S.M. Tomasi (eds.), *Global Trends in Migration* (New York: CMS, 1981), pp. 54–5.

<sup>18</sup> E. Morawska, 'The Sociology and Historiography of Immigration', in V. Yans-McLaughlin (ed.), *Immigration Reconsidered: History, Sociology and Politics* (New York: Oxford University Press, 1990), pp. 187–240; S. Sassen, *The Global City: New York, London, Tokyo* (Princeton, NJ: Cambridge University Press, 1991); S. Sassen, *The Mobility of Labor and Capital: A Study in International Investment and Labor Flow* (Cambridge, 1990); E.M. Petras, 'The Global Labor Market', pp. 44–63; A. Portes and J. Walton, *Labor, Class, and the International System* (New York: Academic Press, 1981).

peripheral, non-capitalistic societies creates a mobile population that is prone to migrate from the periphery to the core in Western Europe, North America, Oceania and Japan. This basic migratory process is augmented by the existence of ideological and material ties created by prior colonization.<sup>19</sup> According to Sassen, significant levels of direct foreign investment also promote emigration to the core.<sup>20</sup>

There are various difficulties with the world system theory, as well as with the dependency theory on which it built. Critiques of the two theories question the causal relationships between economic and social backwardness and dependency presented by these theories; their excessive reliance on economics; their theoretical rigidity; and their inability to account for Third World countries that have been relatively successful from an economic standpoint.<sup>21</sup> But the major drawback of the world system approach in the context of this article is its focus on the origins of migration rather than on the causes of immigration control policy. The reason for that is the theory's concentration on the global economic structure and on classes that transcend the confines of the state. Indeed, Brubaker criticizes the world system approach for focusing on political economy, while neglecting specifically social and political structures.<sup>22</sup> And Zolberg rejects Wallerstein's view of the world system as devoid of any overarching political structure, and of states as mere instrumentations of the capitalist dynamic.<sup>23</sup>

Adherents of the world system theory, who do analyse the receiving side, follow the standard Marxist approach. Portes and Walton (following Castells) argue that:

In general, the function of migrant labour has not been—as conventional economics suggests—to increase the supply of labour, but rather to increase the supply of *cheap* labour ... the role of immigrants has frequently been to counteract the organizational efforts of domestic workers and to substitute the latter in areas where labour costs have become high... In general, the weaker the legal standing of immigrant workers, the more employers can make use of political threats, including deportation, to obtain compliance.<sup>24</sup>

But the Marxist analysis of immigration control policy has its own problems. First, it fails to explain policy on immigration of dissimilar ethnic origin. According to the Marxist approach, the state (in the service of the capitalists) encourages the importation of immigrants of dissimilar race and ethnic composition in order to cause racial tensions between them and the local labour, and to divide the working class. In practice, however, immigration control policies have discriminated against immigrants of dissimilar racial and ethnic composition. Second, the exclusive focus of the Marxist approach on the economic motive lessens its ability to explain refugee

<sup>19</sup> D.S. Massey et al., 'Theories of International Migration: A Review and Appraisal', *Population and Development Review*, 19:3 (1993), pp. 444–6, 461–2.

<sup>20</sup> Sassen, *The Mobility of Labor and Capital*, p. 21.

<sup>21</sup> Viotti and Kauppi, *International Relations Theory*, pp. 416–18. See, for example, T. Skocpol, 'Wallerstein's World Capitalist System: A Theoretical and Historical Critique', *American Journal of Sociology*, 82 (1977), pp. 1075–90; P. Gourevitch, 'The International System and Regime Formation: A Critical Review of Anderson and Wallerstein', *Comparative Politics*, 10 (1978), pp. 419–38.

<sup>22</sup> R. Brubaker, *Citizenship and Nationhood in France and Germany* (Cambridge, MA: Harvard University Press, 1992), p. 22.

<sup>23</sup> A.R. Zolberg, 'International Migrations in Political Perspective', in Kritz, *Global Trends*, p. 9; A.R. Zolberg, 'Origins of the Modern World System: A Missing Link', *World Politics* 23:2, (1981), pp. 253–81.

<sup>24</sup> Portes and Walton, *Labor, Class*, pp. 49–50. Portes and Walton refer to the analysis of M. Castells, 'Immigrant Workers and Class Struggles In Advanced Capitalism: The Western European Experience,' *Politics and Society*, 5:1 (1975), pp. 33–66.

policies and other permanent immigration control policies that are influenced by foreign policy considerations and by wars. For example, Portes and Walton claim that although many types of migration have existed, today the migration of labour has come to define modern population movements.<sup>25</sup> But this type of approach is ill suited to explain permanent immigration control policies and asylum policies, including most European immigration control policy since 1973. Finally, Marxist writers refer to the 'state apparatus of capital', and equate capital's and the state's stands on immigration. But they mostly fail to indicate exactly how capital makes the state adopt its preferred policies.

The main contribution of the world system approach, in my opinion, is in highlighting global economic cycles. When we combine these with Castells' Marxist analysis of the link between fluctuations in the economy and immigration control policy (something that the world system approach itself does not do), we arrive at an explanation for similarities in the immigration control policies of various receiving countries. This is demonstrated in the model that follows.

### **Interdependence between socioeconomic and foreign policy factors**

The main reason for the similarities among the immigration control policies of the major receiving countries is the international interdependence between the socio-economic and foreign policy factors that produce these policies. The state of the economy, the volume of dissimilar immigration, wars, foreign policy considerations and ideological considerations shape the immigration control policies of individual states.<sup>26</sup> Global trends in each of these factors—including the global economic cycle, shared migratory pressures, alliances that produce common considerations of foreign policy, wars that receiving countries are involved in or influenced by, and global ideological cycles—produce the similarities among immigration control policies.

*Hypothesis 1.* At the state level: economic downturns lead to restrictions on immigration, while economic prosperity facilitates the liberalization of immigration control policy. At the global level: global economic downturns cause various receiving countries to restrict immigration, while economic prosperity causes them to liberalize immigration control policy.

*Hypothesis 2.* At the state level: opposition to large-scale immigration of dissimilar racial or ethnic composition contributes to restrictions on immigration. At the global level: common migratory pressures cause various receiving countries, which share a common racial and ethnic preference system, to restrict immigration.

*Hypothesis 3.* At the state level: wars facilitate the establishment of migrant worker programmes and lead to restrictions on permanent dissimilar immigration. At the global level: wars in which the various receiving countries are involved cause them to establish migrant worker programmes and to restrict permanent dissimilar immigration.

*Hypothesis 4.* At the state level: receiving countries tend to accept immigrants from specific countries in order to advance foreign policy goals, such as improving

<sup>25</sup> Portes and Walton, *Labor, Class*, p. 21.

<sup>26</sup> See Meyers, *International Immigration Policies*.

military and trade relations with allies, demonstrating opposition to adversaries, gaining international respectability, and sustaining political links that evolved in the past. At the global level: common foreign policy considerations, such as anti-communist and anti-Soviet ideological commitment, cause various receiving countries to accept immigrants from those specific countries.

*Hypothesis 5.* At the state level: racist attitudes facilitate restrictions on immigration, while liberal attitudes promote the liberalization of immigration control policies. At the global level: international racist trends facilitate restrictions on immigration, while international liberal trends promote the liberalization of immigration in various receiving countries.

*Hypothesis 6.* A neomercantilist economic ideology facilitates restrictive trade and immigration control policies, while an economic liberal approach promotes the liberalization of immigration and trade policies.

### *Global economic cycles*

Global economic cycles, produced by international economic interdependence, are the most important reason for the similarities among immigration control policies. In times of economic decline and increasing unemployment, workers push for restrictions on immigration. The employers, who face a reservoir of workers willing to work for lower wages, limit their investment in immigration advocacy because the marginal utility of such an effort declines. Consequently, the government restricts immigration. In contrast, during economic prosperity, employers are desperate for additional manpower, and they invest resources in promoting liberal immigration control policies. The workers in low-paying jobs limit their opposition to immigration because the inflow of immigrants into these jobs allows them to climb the social and professional ladder. The government, faced with pressures for additional migrants on the part of the employers, liberalizes immigration control policy.<sup>27</sup>

The unemployment rates of various receiving countries have changed simultaneously: most of them were hit by economic recessions between 1873 and 1897 (especially in 1873–78, 1883–86 and 1891–97), in 1907–08, 1914, 1919–24 (especially between 1921 and 1923), 1929–39 (especially between 1929 and 1935), 1966–68, and after 1972–73 (with unemployment rates further increasing in the 1980s). These global economic recessions simultaneously produced restrictions and/or attempts to impose restrictions on immigration to the United States, Germany, Canada and the Australian state of Queensland in 1885; in the United States, Britain, Australia, Canada and Sweden between 1891 and 1897—in particular between 1894 and 1897; in the United States, Canada, Australia, Sweden, Germany and France in 1907–08; in the United States, Australia, Britain, Canada, the Netherlands, Germany and Switzerland between 1919 and 1924; in the United States, Canada, Germany, France, Switzerland and Australia between 1929 and 1935; in Sweden, Germany, France and Britain during the 1966–68 recession; and in most Western European countries in 1972–74, during the 1980s and in the first half of the 1990s. In contrast,

<sup>27</sup> A similar argument appears in G.P. Freeman, 'Modes of Immigration Politics in Liberal Democratic States,' and 'Rejoinder', *International Migration Review*, 29:4 (1995), pp. 881–902, 909–13.

most of the receiving countries recruited foreign labour, expanded permanent migration or at least avoided restrictions during global economic upswings between 1898 and 1902, between 1925 and 1928 and between World War II and 1973 (with the exception of 1966–68). Various receiving countries linked the state of the economy to immigration control policies: they emphasized the deteriorating economy as the cause for restrictions on immigration; they passed laws that linked the number of migrant workers, and sometimes also that of permanent immigrants, to the state of the economy; and they prohibited the entry of immigrants who might become ‘a public charge’.

### *Shared migratory pressures*

Migratory pressures are the second global trend causing the immigration control policies of the major receiving countries to resemble one another. The majority of the population in most of the receiving countries dealt with in this study is Caucasian and Christian; in about half of them, it is predominantly Protestant. Culture-based theories see racism as a spontaneous response to what is strange and unfamiliar.<sup>28</sup> Thus, Western European immigrants were favoured over immigrants from Africa, Asia and Eastern Europe. Politicians in various receiving countries explicitly said so. In the United States, Senator Henry Cabot Lodge asserted that the literacy test would bear ‘most heavily on Italians, Russians, Poles, Hungarians, Greeks, and Asians, only lightly on the English-speaking peoples, Germans, Scandinavians, and French’.<sup>29</sup> In Britain, members of Parliament and memoranda portrayed the ‘displaced persons’ (European refugees) in racist terms. Miles and Kay describe how ‘DPs became internally differentiated along a North-South divide. The most favourable judgements were reserved for the Balts from the “North” ... By contrast, DPs from south-east Europe were often referred to as “simple peasant types”, unversed in the ways of a complex industrial culture and more “racially distinct”, forming part of an ill-defined but inferior “Slav race”. Consequently, there was a racialized bias towards the recruitment of Balts.’<sup>30</sup>

Because of this racial and ethnic preference system, migratory pressures from Asia, Africa and Eastern Europe produced coincidental restrictions on immigration. A surge in Chinese migration during the 1850s–1880s led to restrictions on such immigration to the United States (1875 and 1882), Australia (1877, 1880–81, 1885 and 1888), New Zealand and Canada (1885). An increase in Japanese immigration was followed by restrictions on such immigration to the United States, Canada and Australia (1905–08). Russian Jews fleeing pogroms encountered opposition and restrictions in Britain (1894, 1898 and 1905), in the United States (1892–98,

<sup>28</sup> See C.T. Husbands, ‘The Dynamics of Racial Exclusion and Expulsion: Racist Politics in Western Europe’, *European Journal of Political Research*, 16:6 (1988), pp. 701–20.

<sup>29</sup> United States 54th Congress, *Congressional Record*, 28, pp. 2817–20 (Washington DC: US Government Printing Office, 1896), quoted in E.P. Hutchinson, *Legislative History of American Immigration Policy 1798–1965* (Philadelphia: University of Pennsylvania Press, 1981), p. 117, n. 62–3.

<sup>30</sup> R. Miles and D. Kay, ‘The Politics of Immigration to Britain: East-West Migrations in the Twentieth Century’, in M. Baldwin-Edwards and M.A. Schain (eds.), *The Politics of Immigration in Western Europe*, special issue of *West European Politics* (London: Frank Cass, 1994), p. 23.

1912–17, 1921 and 1924), in France, and probably in Sweden (1907–18). Jews escaping Nazi Germany during the 1930s met opposition and sometimes restrictions in the United States, Britain, France and Sweden. In the mid-1970s and 1980s, there appeared massive new flows of refugees in both Asia and Africa, attributable to conflicts that engulfed entire regions and to the explosion of long-standing ethnic confrontations.<sup>31</sup> An influx of Asian immigrants (from India, Pakistan, Bangladesh, Sri Lanka and Turkey) during the 1980s produced restrictions on such immigration in Britain (1985–86), Germany (1980, 1985), and Switzerland (1984). The rise in applications for asylum from Third World immigrants fostered restrictions on asylum seekers in all of the receiving countries.

Common migratory pressures associated with external threats, especially with imported radicalism, also produced similar immigration control policies. For example, fears of French radicals led to the enactment of the Alien and Sedition Act and two naturalization acts in the United States during the 1790s, the 1792/93 Aliens Act in Britain, the 1798 and 1799 Laws on the Rights of Citizenship and Freedom of Establishment in Switzerland, and the 1794 Nova Scotia Act in Canada. Fears of German radicals produced the 1848 Aliens Removal Act in Britain and contributed to the xenophobia of the 1850s in the United States.

#### *Alliances and common foreign policy considerations*

The third cause for similarities among the immigration control policies of major receiving countries is alliances that produce common foreign policy considerations. During the Cold War, many Western democracies favoured refugees from communist countries in order to demonstrate their anti-communist and anti-Soviet ideological commitment. The United States welcomed large numbers of refugees from communist regimes in Eastern Europe, the Soviet Union, Cuba, China, and Southeast Asia. Britain accepted Poles, Hungarians, and Vietnamese. Australia admitted Eastern European and Vietnamese refugees. Sweden took in refugees from the Baltic republics, Hungary and Poland. Canada accepted Hungarians, Czechoslovakians and Indochinese (Vietnamese, Laotians and Cambodians). Even Switzerland welcomed Hungarian and Czech refugees. The acceptance of refugees from communist countries in Eastern Europe and later from South East Asia fostered the breakdown of the quota system in the United States and Australia. Eventually, the collapse of communism in Eastern Europe led the receiving countries to reject asylum seekers from former (and even current) communist countries. For instance, Sweden announced it would refuse to accept asylum seekers from East Germany, Poland and Bulgaria in 1990; and the United States limited Cuban immigration in 1994.

The British Commonwealth also facilitated, to some degree, the convergence of refugee policies. In 1972, when President Idi Amin of Uganda announced that all Asians holding British citizenship must leave the country, both Britain and Canada accepted a large number of Ugandan Asian refugees for permanent settlement.

<sup>31</sup> A.R. Zolberg, 'The Next Waves: Migration Theory for a Changing World', *International Migration Review*, 23:3 (1989), pp. 414–15.

However, Australia declined official requests from Britain, and admitted only several hundred refugees.

The main exception to the common foreign policy argument is the tendency of some receiving countries to accept immigrants from specific countries of origin—in particular colonies or former colonies—with which they want to sustain political links. For example, Britain accepted New Commonwealth permanent immigration; France admitted immigration from its African and Caribbean colonies and former colonies; and the Netherlands accepted permanent immigrants from the former Netherlands East Indies, Surinam and the Netherlands Antilles. But decolonization and the decreased importance of links with former colonies have weakened these tendencies.

### *Wars*

The fourth international phenomenon producing similarities among immigration control policies of major receiving countries is common wars that these countries are involved in or influenced by. On the one hand, wartime labour shortages lead the receiving countries to recruit foreign workers. During World War I, the United States, France and Germany expanded the use of foreign labour (voluntary in the United States and France, forced in Germany). During World War II, the United States, Britain, and France established or expanded the recruitment of foreign labour, while Nazi Germany exploited forced labour.

On the other hand, wars produce social conformity and an association of immigrants with foreign threats, which generate restrictions on permanent immigration. World War I led to restrictions on immigration and/or the introduction of passport and visa requirements in the United States (1917, 1918), Britain (1914), France (1917), Sweden (1914, 1917, 1918), Switzerland (1916, 1917) and Germany (1914). Many of these acts shared similar elements, such as granting the executive the authority to control immigration and deport aliens. Some wartime restrictions also had a long-lasting impact on immigration control policy because they were converted into ordinary laws after the war, usually during recessions.

The mistrust of foreigners also led to restrictions on former immigrants from enemy countries. During World War I, many American localities prohibited the sale of German language newspapers and the teaching of German, Britain interned German residents, Australia interned German and Austrian residents, and German place names were changed by law in Southern Australia. During World War II, the United States excluded persons of Japanese origin from the West Coast and detained them in relocation centres, Australia interned enemy aliens, Britain interned Jewish refugees from Europe, and French decrees restricted the liberties of aliens.

### *Ideological cycles*

Finally, ideological cycles of two types may contribute to the similarity among the immigration control policies of major receiving countries: the cycle between racism

and liberalism, and the cycle between economic openness and protectionism. However, the extent to which these ideological cycles have an independent influence over immigration control policies, one distinct from that of the economic cycle, migratory pressures and foreign policy considerations, remains an open question.

The first ideological cycle is between racism and liberalism, that is, between opposing attitudes with regards to equality and minority rights. Racist theories and terminology were prevalent in various receiving countries during the first decades of this century, and facilitated the passage of restrictions on dissimilar immigration, based on ethnic selection criteria. The war against the Fascist powers, the impact of the Holocaust and the civil rights movements of the 1960s–70s delegitimized the use of overt racist terminology and policies, and helped abolish ethnic-based quotas. Racist attitudes revived, to some extent, in Europe during the 1980s. However, this recent surge in racism has primarily been the product of an increase in dissimilar immigration and of the growing permanency of former migrant workers.

Prior to World War II, racism and theories of ‘social Darwinism’ thrived not only in Germany, but also in other receiving countries to varying degrees. In the United States, for example, The Ku Klux Klan reached its peak in the first half of the 1920s. Madison Grant’s racist book *The Passing of the Great Race*, was published in 1916, and Jack London wrote about Southern and Eastern Europeans swamping the blond, master race in America.<sup>32</sup> The ‘Nordic theory’ and ‘Scientific racism’ gained ground during the 1920s, with books such as Charles W. Gould’s *America, A Family Matter*, Clinton Stoddard Burr’s *America’s Race Heritage*; and Ellsworth Huntington’s *The Character of Races*.<sup>33</sup> These racist theories and literature legitimized restrictions on immigration from Asia and Eastern and Southern Europe, especially in the United States, Australia, and Canada.

The war against the Fascist powers and the impact of the Holocaust delegitimized the use of overt racist terminology and policies, and helped abolish the ethnic quotas. By the early 1950s, most American Congressional proponents of the national origins system avoided explicitly racist arguments, while Senator Lehman, an opponent of the system, argued that it is ‘strikingly similar to the basic racial philosophy officially espoused so unfortunately and with such tragic consequences in Nazi Germany a few short years ago’.<sup>34</sup> Tobin describes a similar change in Australian terminology and immigration control policies.<sup>35</sup> As a result, between 1943 and 1974, the United States, Australia, Canada and New Zealand gradually phased out their racial and ethnic selection criteria for immigration. The final stage in the process was facilitated by the 1960s civil rights movement in the United States, which strengthened the concepts of equality and minority rights, and influenced

<sup>32</sup> M. Grant, *The Passing of the Great Race or The Racial Basis of European History* (New York: Scribner, 1916); J. London, *Revolution and Other Essays* (New York: Macmillan, 1910) and *South Sea Tales* (New York: Macmillan, 1911). Quoted in J. Higham, *Strangers in the Land: Patterns of American Nativism, 1860–1925* (New Brunswick; Rutgers University Press, 1955), pp. 156, 172.

<sup>33</sup> C.W. Gould, *America, A Family Matter* (New York: Scribner, 1920); C.S. Burr, *America’s Race Heritage* (New York: The National Historical Society, 1922); E. Huntington, *The Character of Races as Influenced by Physical Environment, Natural Selection and Historical Development* (New York: Scribner, 1924). Quoted in Higham, *Strangers*, pp. 273–4.

<sup>34</sup> Congressional Record, 11 May 1952, p. 5102. Quoted in D.M. Reimers, ‘Recent Immigration Policy: An Analysis’, in B.R. Chiswick (ed.), *The Gateway: US Immigration Issues and Policies* (New York: University Press of America, 1982), pp. 25–6.

<sup>35</sup> G. Tobin, ‘Australian Immigration Policy and Politics’, in M.C. LeMay (ed.), *The Gatekeepers* (New York: Praeger, 1989), p. 49.

other countries. In the United States, President Kennedy authored the book *A Nation of Immigrants*, which stood in sharp contrast to the racist literature of half a century earlier.<sup>36</sup> As Reimers notes, 'Bigotry and even vague defences of national origins quotas for immigration, so easily enacted by lopsided majorities in 1952, were simply not publicly acceptable in the mid-1960s'.<sup>37</sup> Australian Aboriginals were enfranchised in 1962, and in 1973 Prime Minister Gough Whitlam stated that: 'Just as we have embarked on a determined campaign to restore the Australian aborigines to their rightful place in Australian society, so we have an obligation to remove methodically from Australia's laws and practices all racially discriminatory provisions, and from international activities any hint or suggestion that we favour policies, decrees or resolutions that seek to differentiate between peoples on the basis of their skin'.<sup>38</sup> Finally, Britain passed the Race Relations Acts of 1965 and 1968.

World War II also delegitimized the use of overt racist terminology and policies in Europe, as the opponents of discriminatory immigration control policies equated them with Nazi racist philosophy. In Germany, during a parliamentary debate on asylum seekers, Herta Daubler-Gmelin from the SPD referred to Kohl as a 'schreibtischtäter', a word normally used to describe bureaucrats in the Nazi Government who administered mass murder from behind their desks.<sup>39</sup> A 1991 article argued that many German citizens want to stop the wave of immigrants, but that the political leaders are afraid to act against foreigners due to German history.<sup>40</sup> In the Netherlands, the growing number of immigrants has led to a gradual rise in feelings of xenophobia and prejudice, 'although it is still considered improper to express such feelings in public'.<sup>41</sup> And in Britain, one of the reasons for not restricting New Commonwealth immigration in the early post-war period was the 'embarrassment ... [of] arousing suspicions of racism so soon after a world war partly waged against the racial genocide of the Hitler regime'.<sup>42</sup> When Powell and several other Conservative candidates in Britain presented anti-immigration stands prior to the 1970 elections, they were denounced by a Labour minister as being similar to race policies pursued by the Nazis in Germany.<sup>43</sup> In 1980, when the Conservative government passed an act limiting family reunification, its opponents on the Left accused it of being racist.<sup>44</sup>

However, it is difficult to determine whether the ideological cycle between racism and liberalism has an independent influence over immigration control policies, or whether it is a mere reflection of the other socioeconomic factors. First, the ideological cycle might reflect or be the outcome of the economic cycle. Racism tends to spread during hard times, when people look for a scapegoat for their economic troubles; it tends to contract during times of prosperity, such as the 1960s.

<sup>36</sup> J.F. Kennedy, *A Nation of Immigrants* (New York: Popular Press, 1964).

<sup>37</sup> D.M. Reimers, 'Recent Immigration Policy: An Analysis', in B.R. Chiswick (ed.), *The Gateway: US Immigration Issues and Policies* (New York: 1982), p. 33.

<sup>38</sup> Much of Whitlam's statement also referred to foreign policy considerations. The Prime Minister's Foreign Policy Statement, House of Representatives, Canberra, 24 May 1973. Quoted in Hawkins, *Critical Years*, p. 94.

<sup>39</sup> *New York Times*, 18 October 1991.

<sup>40</sup> *New York Times*, 1 October 1991.

<sup>41</sup> H.B. Entzinger, 'The Netherlands', in Hammar, *European Immigration Policy*, p. 82.

<sup>42</sup> Layton-Henry, *The Politics of Immigration*, p. 71.

<sup>43</sup> D.T. Studlar, 'Great Britain', in R.E. Krane, *International Labor Migration in Europe*, (New York: Praeger, 1979), p. 91; Layton-Henry, *The Politics of Immigration*, p. 83.

<sup>44</sup> Layton-Henry, *The Politics of Immigration*, pp. 189–90.

Second, the ideological cycle between racism and liberalism might be the product of changing migratory pressures. An upswing in racism is sometimes the product of an increase in dissimilar immigration, as was the case in Europe during the 1980s, and possibly in the United States during the 1910s and 1920s. Third, ideological trends might reflect changes in foreign policy considerations. In particular, the emergence of East Asian economic and military powers, and the decolonization process that produced a large Afro-Asian bloc in the United Nations, have facilitated the abolition of race-based restrictions since World War II. Finally, the ideological cycle might only influence the form but not the substance of immigration control policy. Policymakers who come under domestic pressures to restrict immigration of dissimilar origin find ways to do so without using overt racist terminology. In Britain, growing domestic opposition to immigration and the decline of the Empire (which weakened the influence of foreign policy considerations) led the government to adopt the concept of 'patriality' in order to give preference to Old Commonwealth white immigrants over New Commonwealth coloured immigrants, thereby avoiding the overt use of a race-based quota.

The second ideological cycle which might influence immigration control policies is the one between economic openness (that is, the economic liberal approach) and protectionism (that is, neomercantilism). There is an ideological affinity between advocating the free movement of goods and that of people. Moreover, at first glance it seems that the two types of policies have coincided: (1) in the mid-nineteenth century, Western Europe moved towards free trade, and immigration was practically unrestricted; (2) between 1880 and 1914, there was a partial return to protectionism in trade, and the rate of growth of international commerce slowed somewhat between 1873 and 1896; it accelerated again in the two decades before World War I. During the same period, many receiving countries restricted the immigration of specific groups, but most immigration remained unchecked and even expanded; (3) in the interwar period, countries severely restricted both imports and immigration; (4) between 1945 and the early 1970s, the Dillon and Kennedy GATT rounds and the Bretton Woods monetary system helped expand international trade. During the same period, the receiving countries implemented large-scale migrant labour recruitment programmes, increased permanent immigration and eliminated racial barriers to immigration; (5) since the early 1970s, Western countries have used non-tariff-barriers (NTB's) and voluntary export restrictions (VER's) to limit imports, while removing barriers to trade within regions (the EC, NAFTA, and so on). The same countries have also ended migrant labour programmes, attempted to halt illegal immigration and to reduce the number of immigrants granted asylum, and, at the same time, eliminated barriers to the free movement of people within the EC.

But there are four difficulties with this proposed association of trade and immigration control policies. First, trade and immigration are to some degree substitutes, that is, an increase in trade between labour-intensive and capital-intensive countries decreases the need for labour migration from the former to the latter. Thus, liberal trade policies may eliminate the need for liberal policies on migrant workers. Second, labour is a factor of production, and thus a neomercantilist ideology might support immigration. Third, the empirical link between the two policies is only partial and sometimes misleading. For example, in the 1860s–70s, when Western European countries moved towards free trade, they were

countries of emigration rather than immigration. The major country of immigration—the United States—accepted immigrants but restricted imports. In 1905, Britain—the champion of free trade—restricted immigration. In the 1980s and 1990s, GATT, GATS and other international agreements have removed barriers to international trade, but most types of inter-regional immigration have been restricted. The partial divergence between trade and immigration control policies is evident in the American case, as shown in Table 1.

The fourth difficulty with the ideological cycle argument is that it might reflect the economic cycle. That is, prosperity facilitates liberal trade and immigration control policies, and recessions produce restrictive trade and immigration control policies,

Table 1. *A comparison of United States trade and immigration control policies.*

Years	Trade policy	Immigration control policy
1816–32	Restrictive: tariff acts of 1816, 1828 and 1832	Liberal
1833–60	Liberal: tariff reductions in 1833, 1846 (Walker Act) and 1857 (General Tariff Act)	Liberal
1861–81	Restrictive: tariff act of 1861 (Morill Act) and ‘temporary’ war-time tariffs that continued after the Civil War	Liberal: 1864 Contract Labour Act, recruitment in Europe, minor restrictions start in 1875
1882–93	Restrictive: 1883 General Tariff Act	Restrictions on Chinese (1882) and contract labour (1885), but no restrictions on Eastern and Southern European immigration
1894–96	Liberal: a moderately liberalizing tariff act under President Cleveland	Failed attempts to restrict Eastern and Southern European immigration by means of a literacy test
1897–1912	Restrictive: 1897 Dingley Tariff Act, 1909 Payne-Aldrich Tariff Act	Failed attempts to restrict Eastern and Southern European immigration; restrictions on Japanese immigration; however, peak immigration
1913–20	Liberal: 1913 Underwood Tariff Act	Restrictive: 1917 and 1918 immigration acts, including a literacy test
1920s–30s	Very restrictive: 1921 Fordney-McCumber and 1930 Smoot-Hawley Tariff Acts	Very restrictive: 1921 and 1924 Quota Acts; restrictions on Mexican and Filipino immigration
1945–1960s	Liberalization	Liberalization
1970s-90s	Trade conflicts, especially with Japan; VER’s and NTB’s; on the other hand—NAFTA and GATT liberalize trade	Restrictions on illegal immigration and asylum seekers; 1990 Act expands legal immigration; no free movement of people in NAFTA and no global migration regime

thus generating a spurious congruence between the two types of policies.<sup>45</sup> According to this interpretation, a prosperous global economy led to liberal immigration and trade policies during the mid-nineteenth century; a global recession led to restrictions on immigration and trade between the World Wars; a revived economy produced liberalization of both types of policies between World War II and the early 1970s; and the 1973 recession generated restrictions on immigration and the use of NTB's in trade.

## Conclusions

In recent years, some scholars have argued that there has been a convergence of the immigration control policies of the industrial democracies. This article has sought to demonstrate that, in fact, there has been an extraordinary similarity among the immigration control policies of the major receiving countries for over a century. It examined six alternative explanations for these similarities in immigration control policies: (1) a global hegemon that forces or persuades various countries to act in unison; (2) global or regional migration regimes and organizations; (3) interdependence between the immigration control policies of various countries; (4) emulation of immigration control policies of one country by other countries; (5) the world system approach; and (6) interdependence between the socioeconomic and foreign policy factors that lead to immigration control policies. The article argued that while each explanation sheds light on some cases, it is the last factor that explains most of the similarity among immigration control policies.

Global economic cycles produced by international economic interdependence, and, to a lesser extent, shared migratory pressures, are the most important reasons for similarities among immigration control policies. Alliances that produce common foreign policy considerations, and wars that receiving countries are involved in, also lead to the convergence of immigration control policies in various receiving countries. The ideological cycle between racism and liberalism, and the one between economic openness and protectionism, may contribute to the similarity among the immigration control policies of major receiving countries. But the extent to which these ideological cycles have an independent influence over immigration control policies, one distinct from that of the economic cycle, migratory pressures and foreign policy considerations, remains an open question.

While these conclusions stem from a comparative analysis of immigration control policies in most major receiving countries, they warrant further research. First, the analysis focuses on Western liberal democracies (with the exception of Germany during certain periods), which share several political and cultural characteristics. Although the analysis of 'comparable cases' has its benefits, it may lead to 'over-determination', that is, an inability to eliminate some alternative explanations. Future research on immigration control policies in other parts of the world—

<sup>45</sup> For the link between the state of the economy and trade policies see G.M. Gallarotti, 'Toward a Business Cycle Model of Tariffs', *International Organization*, 39:1 (1985), pp. 155–88; T.J. McKeown, 'Hegemonic Stability Theory and the 19th Century Tariff Levels in Europe', *International Organization*, 37:1 (1983), pp. 89–91.

particularly in Latin American receiving countries—could serve to confirm or contradict the conclusions of this study. Second, despite the extraordinary similarity among the immigration control policies of the major receiving countries, there is a need for a systematic analysis of the factors causing differences between their policies.<sup>46</sup> Third, the ideological and epistemic community explanations for similarities in immigration control policies should be further studied, in order to determine whether these factors substantially influence immigration control policy without regard to the socioeconomic and foreign policy ones. Such an inquiry could follow Goldstein and Keohane's approach in *Ideas and Foreign Policy*.<sup>47</sup> Fourth, the study of EU immigration control policies can shed light on the influence of migration regimes on the policies of individual countries.

Finally, an analysis of trends in the global economy, migratory pressures and interstate relations permits predictions about future convergence, or divergence, in immigration control policies, based on the model presented here:

- The widening demographic and economic gaps between Third World and industrialized countries is likely to produce growing immigration pressures and a further convergence of restrictions on immigration.
- The globalization process, which intensifies the economic interdependence between various countries, is likely to speed up the pace of convergence among immigration control policies.
- Opposing processes of convergence and divergence are likely to influence asylum policy. On the one hand, the end of the Cold War, which has caused a decline in anti-communist ideology, will eliminate the common asylum policies towards refugees from Eastern Europe, and replace them with national considerations. On the other hand, the harmonization of asylum policies by the European Union will produce a convergence of such policies in Europe.

<sup>46</sup> See, for example, Freeman, 'Modes of Immigration Politics'; Meyers, *International Immigration Policies*.

<sup>47</sup> J. Goldstein and R.O. Keohane (eds.), *Ideas and Foreign Policy: Beliefs, Institutions, and Political Change* (Ithaca, NY: Cornell University Press, 1993).