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Comparative Migration Studies: an introduction

Sawitri Saharso & Peter Scholten

A new journal with a comparative orientation

This inaugural issue marks the launch of the new journal Comparative Migration Studies (CMS). Over the past decades, and especially since the 1970s and 1980s, migration studies has evolved rapidly as a research field rooted in various disciplines. Like the phenomenon of migration itself, migration research has become increasingly globalized, which is manifested by the many migration research institutes across the world where academics from various disciplines work together.

CMS will promote comparative migration research based on the firm belief that comparative work will promote the theoretical development of migration research as only through comparison can we discover what is specific to a case. We understand comparative research in a broad sense and is involving four main areas (a point developed by Marco Martiniello in his contribution to this issue). One type compares people, which can be groups or categories of migrants in a particular situation. Another compares places, which could, for instance, be nations but also supranational entities, regions, cities, municipalities or neighbourhoods. A third type involves comparisons between different (historic) periods, adding a historical dimension to comparative research. Finally, as migration research is a multi-disciplinary field drawing from various disciplines and competing theoretical perspectives, the fourth type involves comparisons between these different disciplines and theoretical perspectives. CMS will promote engagement by scholars in all these areas of comparative research across disciplines and different theoretical perspectives.

CMS has no preferred geographical focus and intends to adopt a global approach to its search for the best comparative research on international

migration. Migration research was and regularly still is rather nationally oriented and focussed on South-North migration. This can mean a relative neglect of South-South migration movements. CMS journal was founded to stimulate researchers to go beyond a strictly national orientation in the belief that cross-national comparison is and will continue to be important as international migration is necessarily about movement across national borders. International migration thus impacts on the development, consolidation and transformation of the nation state system, as well as challenges to it. Migration researchers therefore continue to compare across states, yet increasingly also focus on the supranational or international levels, as well as exploring the sub-national, including regions and big cities.

CMS adopts a broad definition of migration in the sense that we actively encourage contributions that explore not only the process of migrating, but also to the factors that trigger migration and to the consequences of this migration for both countries and destination countries. This could involve, for example, studies of migration processes and policies as well as economic, social, legal and political determinants of migration and processes related to ethnicity and migrant incorporation that are subsequent to migration. As such, CMS invites contributions on diverse facets of migration, including immigration/emigration, social and economic remittances, integration, assimilation, migration policies, migration law, incorporation policies, governance of migration and integration, ethnic/cultural/religious diversity, migrant rights, gender and migration, migration and citizenship, migration and national identity, migration and security, civic integration, nationalism and migration and ethnic entrepreneurship.

An open access journal

CMS is an open access journal. It is driven by the belief that open access publishing is the best strategy for promoting the exchange of knowledge and information in the social sciences in the 21st century. Open access guarantees the widest possible readership for the work published in the journal, without commercial interference. For CMS authors, being able to reach out to a wide audience of peers through published work that is accessible is increasingly important and promote both recognition and citation.

The academic peer review procedures of CMS follow the double-blind peer review procedure that is standard for academic journals in our field. The editorial committee, assisted by a broad, international and multidisciplinary advisory committee will ensure that the work submitted to

CMS is closely reviewed. This policy will also apply to submission of special issues in which each, single article will be subject to review.

Open access also enables CMS to publish faster than many other journals in our field. Once an article is approved following review, it will be published immediately. At the same time, we will also keep publishing journal issues, including special issues as well as open issues; per year we will publish at least 4 issues. In the future, as open access becomes normalized in the social sciences, we will publish only special issues as issues while individual articles will be published on a rolling basis.

Open Access gives CMS academic freedom. The absence of a commercial publishing interest enables CMS to publish top quality work when we want it and how we want it. This requires that we also pursue the author-pays model. Yet, with the help of academics that invest their time into CMS, the support of Amsterdam University Press and with funding from a start-up grant generously provided by the Dutch Science Foundation, we will only ask for a relatively small author-pays fee which will only be required for special issues and paid only for accepted articles. For now we are able to process and publish individual article submissions free of charge.

This inaugural issue

This inaugural issue of CMS provides a 'flash-forward' perspective on the meaning of comparative research for the development of migration studies. It does not aim or intend to be another state-of-the-art of migration studies. Rather, it identifies a number of research topics that we believe to be increasingly important research niches for the coming decades. It also involves articles that are comparative in various ways as identified before and bring insights from different disciplines. Furthermore, we have consciously sought to being together articles that develop different comparative research designs and use different (qualitative as well as quantitative) research methods.

The issue opens with a contribution by Marco Martiniello on Comparisons in Migration Studies. Here Martiniello elaborates four types of comparative research in migration studies and identifies several promising directions for future comparative migration research. Amongst others, Martiniello makes the argument for more gender comparative research (see for instance King a.o. in this issue), city-to-city comparisons (see for instance Phalet a.o. in this issue) and interregional and intercontinental comparisons (such as North-South comparisons but also transatlantic comparisons such

as that developed by Street in this issue). These are directions to which CMS will attribute high priority in the years to come.

The article by Alex Street on the dynamics of naturalization decisions in the context of migrant families offers an excellent example of the sort of comparative research this journal seeks to promote. By comparing findings from Austria and the United States, Street builds a theoretical argument about naturalization behavior at the family level. One of the reasons this article was selected for the inaugural issue lies in its focus on the family level as a relatively under-explored level of analysis.

Another issue that is likely to become increasingly important concerns how debate about migrant incorporation and citizenship relates to the more general political and academic debate about on civil rights. In a UK-Canadian comparison, Irene Bloemraad and Doris Marie Provine show how civil rights are conceived and sometimes extended to foreign-born residents in different nations. In their article, they also lay the foundation for a comparison between Europe and Oceania.

Gender matters in the study of migration, also because migration may impact on gender relations in migrants' households. The article by Russell King, Diana Mata-Codesal and Julie Vullnetari addresses gender in relation to another key research concern for which comparative research is inevitable; migration and development. Combining data from Ecuador and Albania, the authors focus in particular on the effect of remittances on gender relations in these two countries. As such, they offer an intriguing perspective on how migration can affect social relations not just in the country of destination but also the country of origin of migrants.

Mathias Czaika's article asks whether unequal countries are more migratory. In an impressive comparative design, bringing together data from around 200 countries, Czaika focuses in particular on religious, ethnic and linguistic fractionalization of societies and its correlation with the propensity to migrate to show that ethnic and linguistic fractionalization increases the propensity to emigrate, whereas, surprisingly, this is less the case for religious fractionalization. This article shows the relevance of a global perspective on the root causes of migration and the value of comparative research in this respect.

Two articles then focus on what has become and is likely to remain an important topic in migration studies for some time to come, the role of Islam in society. Pursuing an ambitious comparative research design, Phalet, Maliepaard, Fleischmann and Güngör compare religious identification amongst Turkish and Moroccan Muslims in a number of cities throughout Europe (in Belgium, Germany, the Netherlands and Sweden) to show that

religious boundaries are reinforced in West European cities by social inequality and by the accommodation of religious institutions. This article develops not solely an important research topic, but also provides a good example of the type of city-to-city comparisons is increasingly important in migration studies.

The second article by Christopher Cochrane focuses on a highly controversial and salient topic, which is attitudes of Muslims to same-sex marriage through comparison of Muslims to other religions in Canada, as well as comparing different types of Muslim in Canada. It confirms that religiosity increases the likelihood of negative opinions on same-sex marriages and also shows that there is a greater heterogeneity amongst Canadian Muslims in this respect, correlating with the extent of religiosity, level of education and residence period in Canada. This article also shows how single-case studies contribute to comparative research.

The final article of this inaugural issue adopts a more policy-scientific perspective on one of the central research topics in this field: asylum migration. From a comparative perspective, the 'communitarisation' of asylum policies at EU level has had an important converging effect on asylum policies in European countries. Using the concept of vertical venue-shopping, Kaunert and Leonard show that refugee-assisting NGOs have increasingly organized and mobilized at EU level and exerted influence on policymaking.

Our intention is that this inaugural issue of CMS will help to set comparative research agendas for migration studies. There are, of course, many important research topics that are not addressed in this inaugural issue, but we hope that in years to come people will look back at this inaugural issue and be able to assess the importance of these contributions to the development of new research niches. CMS will provide a forum for excellent comparative research in the field of migration studies, with a keen eye for new and evolving research niches.

About the authors

Sawitri Saharso, VU University Amsterdam.
E-mail: s.saharso@vu.nl.

Peter Scholten, Erasmus University Rotterdam.
E-mail: p.scholten@fsw.eur.nl.

Comparisons in Migration Studies

Marco Martiniello

Abstract

The paper presents and critically discusses the different types of comparison developed in migration studies with a special attention to European literature. It then identifies missing topics and issues to be covered by comparative research in the field by focussing on European and on North American research.

Keywords: migration, post-migration dynamics, migration studies, comparative research

1.   Introduction

In the current age of migration (Castles and Miller, 2009), research remains fragmented in different ways. The first line of fragmentation is between migration studies and post-migration studies. On the one hand, some scholars examine migration flows and patterns of human mobility. They try to understand and/or explain why people move, how many do so, where they go, what is their itinerary and what policies are designed in order to manage international and internal population movements.

On the other hand, other researchers focus on what I call the post-migration situation (Martiniello, 2012). The expression refers to what happens when migrants enter a new country and settle there. The focus here is on the examination of how they find a place, and on how they are allocated one, in their new society. Do they integrate, assimilate, form distinct societies beside the mainstream society? How are they perceived and treated by the local citizens? Do they face discrimination, racism? Are they accepted, tolerated, incorporated, excluded? Do they have access to citizenship and rights? What are the policies developed to respond to their

presence: integration policies, assimilation policies, multicultural policies, etc.? To put it simply, a part of the research community is interested in migration flows and movements and the other part deals more with migration stocks in the host societies as if there was a sharp analytical distinction between migration movements and migrant integration. This traditional distinction between migration and post-migration studies is not always and everywhere as sharp as I have described, but it remains problematic. The fact that specialists of migration movements and specialists on the various issues linked to integration do not usually work together rests on the illusion that migration flows and integration are somewhat distinct phenomena that can be studied separately. However, it seems undisputable that migration and integration are strongly related.

The conditions under which migration movements occur have an impact on the range of opportunities of integration in the new country. For instance, leaving ones' country and entering the new country clandestinely do not provide the same opportunities of integration as being admitted as a high-skilled worker. It is therefore fruitful to look at the migration process globally by considering both the modalities of movements and the modalities of establishment in a new society as well as the links that the migrant may keep with the country of origin. Fortunately, *The Journal of Comparative Migration Studies* understands migration in a comprehensive way. The contributions to this first issue deal both with migration dynamics and with different dimensions (social, economical, political and cultural dimensions including immigrant integration, assimilation, ethnicity formation and racism) of the post-migration situation. This is certainly an added value of the new journal.

Considered globally, migration and post-migration studies is a multidisciplinary research field dominated by North American scholarship even though research has developed on all the continents and notably in Europe. Until recently, research was strictly anchored in the nation-state experience of the receiving countries. The well established national research traditions in the field that defined a methodological nationalism that was challenged by scholars advocating a transnational perspective in the 1990s but before that, by the Algerian-French sociologist Abdelmalek Sayad in his famous article *Immigration and State Thought*. He argued, "to about migration is always to think about the state, and more precisely, it is to think about the state that thinks about migration" (Martiniello and Rath, 2010).

It is important to bear in mind these important characteristics when starting a discussion on comparative research on migration and post-migration situations, which is the topic of this article. The place of comparison varies from one discipline to another. The type of relevant comparison is not the same in nationally anchored research and in transnational research. However, comparative studies have always played a crucial role in the development of migration and post-migration studies alongside single case studies of specific migration groups or migration experiences, on the one had, and overarching theories of migration and incorporation, on the other hand. In a way, in the field (as in other social science fields) it is very difficult not to compare even when comparison is not systematized or even when it remains implicit. Generalisation cannot be reached without comparisons. According to John Stanfield II, "The best social scientific work is comparative. This is because, whether we are trying to explain something about the world or to predict future trends and tendencies, our arguments are strongest when we are able to bring to the table evidence drawn from more than one case" (Stanfield II, 1993:25). Surprisingly, there are not that many publications addressing specifically the pros and cons of comparison in migration and post-migration studies. Recently, (Bloemraad, 2013) and (Fitzgerald, 2012) have specifically discussed theses issues. This article may be read as a complement to their very interesting insights into the status of comparison and the ways to carry out comparative research in the field of migration. This article does not address the issue of comparative research designs. It does not respond to the question of how we compare, which is well covered by (Bloemraad, 2013). Nor does it discuss the issues of comparative field research as advocated by (Fitzgerald, 2012).

In this general context, the article pursues two main aims. The first aim is to critically discuss the different types of comparison developed in migration and post-migration studies with a special attention to European literature. The second aim is to identify missing topics and issues to be covered by comparative research in the field. The focus of the second part will be on European and on North American research even though the comparative scope of the journal is much broader.

2. The types of comparative research in migration and post-migration studies

Four main types of comparative research can be found in the literature on migration and post-migrations situations by asking a very simple question: what do researchers compare? They compare people, places, periods of time and less importantly insights from different academic disciplines in relation to one or several of the research topics and issues that have been explored over time, from migration patterns to political participation of migrants, just to mention two examples.

3. Comparing people

As migration and post-migration research has historically developed within the nation-state framework, comparative research has first logically dealt with people present on the national territory of the receiving countries. Lots of comparisons have been made between immigrant national and ethnic groups. In the USA, a significant part of the literature has tried to explain the differences and similarities between the integration and assimilation patterns of the various national, ethnic and racial groups in American cities (Steinberg, 2001). Do the Irish integrate better than the Italians? Are there differences in the labour market incorporation of Mexicans and African-Americans? How to account for the differences in the naturalization process of different nationalities? Many European scholars followed the same type of national, ethnic and racial comparisons. In Belgium and the Netherlands, for example, it is very usual to compare at least Moroccan and Turkish immigrants and their offspring on many different topics like political participation (Tillie, 1998), school performance or unemployment. More recently, as a consequence of the European integration process, many studies have compared EU mobile citizens, who are not labelled migrants anymore, and third-countries nationals.

These national, ethnic and racial group-to-group comparisons are interesting because they show that the migration process does not affect all national groups of migrants in the same way. However, this can be misleading in at least two ways. First, they often fall into the trap of *culturalization* and *essentialization* of migrant groups and consequently uncritically privilege culture as the major explanatory dimension of the phenomena under examination. Actually, choosing to compare national and ethnic groups

often assumes from the start a *culturalist* approach to the migration process. Since national and ethnic groups are seen as characterized by a distinctive culture and identity, choosing to compare them with reference to their migration process or a particular dimension of their integration expresses the endorsement of the hypothesis that culture not only matters but that it is the most relevant variable to explain similarities and differences in migrant and integration patterns of the various immigrant national and ethnic groups. The problem is not so much to include culture as an explanatory variable but to downplay or even to totally ignore other crucial dimensions such as macroeconomic and structural factors like migration and integration policies. As Martens put it a long time ago, macro structural dimensions are more relevant than culture to explain migrants' integration in a given host society (Martens, 1976). Second, these immigrant national and ethnic group-to-group comparisons most often do not include the local non-immigrant national majority group. Therefore, it is almost impossible to identify the potential specificities of migrant groups by only comparing them to each other.

Besides immigrant national, ethnic and racial group-to-group comparisons, some comparative research prefers to focus on types and categories of migrants. Since historian Marcus Lee Hansen's work (Hansen, 1996), generations of migrants have often been compared. His 1938 essay on the problem of the third generation can indeed be read as a generational comparison within one immigrant group in the United States as to the dynamics of ethnic identification. His famous law predicting that ethnic identity will stay strong for the first generation, will almost disappear for the second generation and then become salient again for the third generation is the first cross-generational comparison in migration and post-migration studies. This type of work is certainly very insightful even though sociologists contested it for its lack of empirical grounding. However, it is hazardous to generalize Hansen's finding to other migrant groups, to other times and other places without additional cross-generation comparisons in many other settings. Still, it is now generally accepted that newcomers and following generations do differ in many respects from their parents' or grandparents' positions in the society of immigration. Not being technically migrants and having been socialized mainly in the receiving country of their ascendants are crucial characteristics of the following generations that distinguish them from the first generation, which impacts many issues such as education, work, identification and social integration.

Finally, in many European countries, an implicit comparison is often made, more in public discourse than in academic research, between old and new migrants. This does not relate to the age of migrants but to the distinction between ancient waves of migrants and contemporary migration flows. Migrant workers, who came right after WWII were wanted, recruited. They were coming from culturally similar countries. Therefore, they easily integrated in the northern industrialized nations. On the contrary, today's migrants are largely unwanted. They originate in all parts of the world and they bring very different cultural and religious traditions to Europe that make their integration much more difficult if not totally impossible. This distinction between old and new migrants is a clear oversimplification. Old migrant workers were indeed recruited by northern European heavy industry to perform the 3D jobs. But they were often seen as too different culturally to integrate. Cultural difference is more a social construction than an objective undisputable reality. They also faced severe discrimination. Today's migrants are not all unwanted. There is even a competition between countries in order to recruit the highly qualified migrant works everybody wants, whatever their cultural differences may be.

Besides comparing people, researchers in migration and most-migration have also compared places as we shall see in the coming section.

4.   Comparing places

Comparisons between places have first been country-to-country comparisons, or more specifically comparisons between national societies or nation-states. One of the first cross-national comparative endeavors in European migration studies is the project led by Hammar (1985). The collective volume edited by the Swedish political scientist systematically compared migration patterns and policies in six European countries (Germany, Switzerland, Britain, Sweden, the Netherlands and France). A few years later, Brubaker (1989) edited a book in which specialists compare the politics of citizenship in four European countries and in the two North American nation-states. The volume attracted a lot of attention on both sides of the Atlantic. Five years later, the book by Soysal (1994) entitled *The Limits of Citizenship* examined the patterns of incorporation in the same countries studied by Hammar and his colleagues ten years earlier. Her hypothesis about the emergence of a postnational form of membership influenced by human rights discourse provoked debates for several years

after its publication. Another book to be mentioned is the Anglo-French comparison of the philosophies of integration published by Favell (1998).

These books were very useful in denationalizing migration and post-migration studies, which were historically very much nationally focused. In a way, they helped move away from methodological nationalism (Wimmer and Glick Schiller, 2002) as also suggested by the holders of a transnational research perspective. These books were followed by many others inspired by comparative political and sociological perspectives related to the Europeanization of migration debates. Each in it is own way constructed the idea that there were national models of immigration management and migrant incorporation. Except for Soysal's research, they were all quite normative or policy oriented and they did not really pay attention to grassroots incorporation processes from the migrants' points of view. They also neglected the importance of the local dimension in explaining the variation in integration processes.

Progressively, it appeared that the national model perspective was to be replaced by a focus on the local and city levels. This opened the space to city-to-city comparisons. In a collective book published in 2000, Body-Gendrot, Martiniello (2000) and their colleagues compared the dynamics of integration and exclusion at the neighborhood level in several European cities by looking at the economic, the political and the social spheres. Since then, the number of comparative city-to-city research studies has increased exponentially on many different issues (political participation, housing, integration policies, etc.). In Europe, this movement is in part explained by purely academic reasons linked to the limitations of a nation-centered approach to immigration and integration. But it is also linked to the *Europeanization* of research through various funding mechanisms that more or less explicitly require this type of comparative study as well as sometimes the exchange of good practices and policy dialogues between local policy makers and researchers.

It is undisputable that integration takes place first at the local level. Often, local context matters more than national models to account for immigrant integration. This has been illustrated by these city-to-city comparisons. However, a few cities tend to attract a lot of attention while other cities are often ignored in comparative research. Amongst the top cities included in a large number of comparative studies one finds several capital cities of member states of the European Union such as Amsterdam, Berlin, London

to which one can add the would-be capital city of a new would-be member state, Barcelona. There are many good reasons to try and compare these major European cities, which all claim to be global (Sassen, 2001). But beyond academic reasons, the omnipresence of these cities in comparative research is also the result of the mobilization of networks of researchers and of the proactivity of the local academic scenes often supported by local policy makers and politicians. However, migration has also had an impact on smaller, more provincial and less flashy cities, and it is increasingly so. It is therefore problematic that the recurrent comparisons of the same major cities distract attention from smaller and provincial cities. There are of course very stimulating exceptions, for example, the work of Bousetta (2010) on immigrants associations in Utrecht, Lille and Liège or the work by Romain Garbaye on ethnic minority politics in Birmingham, Lille and Roubaix (Garbaye, 2005). In addition, some cities have been included in specific issue comparisons such as Bradford, which has been in a way over-studied regarding Islam and Muslims since the Rushdie affair.

Next to country-to-county and city-to-city comparisons, continents can also be compared. There are many studies comparing countries located in different continents, and in particular the USA with European countries such as Britain, France or Germany (Joppke, 1999; Schain, 2012). But there are far fewer studies adopting a transcontinental perspective. In particular, scholars have argued in favor of more USA/European Union comparisons in the field of international migration and integration (Lafleur and Marti-niello, 2009) in which the EU would be considered as an entity on the same footing with the USA with its internal complexity and diversity. EU-USA comparisons are generally not viewed very positively on the American academic side. Of course, American Europeanists study the European continent per se but very rarely venture into comparisons with the USA. When American scholars on migration are interested in Europe, they adopt the same perspective. They are more interested in explaining to Europeans what they can learn from Americans and they seldom consider that they could learn from European scholarship on migration. This patronizing attitude reflects the power of American academia but it is an obstacle facing the development of potentially valuable comparisons between the American and European migration and post-migration experiences. For example, some major American migration scholars like Hochschild and Mollenkopf (2009) have understood the potential strength of transatlantic comparisons through research partnerships between EU and USA scholars.

5.   Other types of comparative research

Besides comparing people and places on specific issues, research can also compare different time periods and the insights of different academic disciplines approaching the same topic. Historians of migration often develop those time comparisons. In Belgium, Anne Morelli has compared anti-immigrant discourse at the end of the 1990s and in the interwar period showing that the same derogatory categories were used in public discourse but they were applied to different national groups in the two time periods: what was said concerning Italians in Belgium in the 1930s was said about Moroccan immigrants in the 1990s. Social historians like Bade (2003), Green (2002) and Lucassen (2006) regularly move back and forth between past and present in their studies by using theoretical tools borrowed from other social sciences such as sociology. This approach is highly stimulating and helpful in order to evaluate the specificity of each period time and of each migration pattern and to appreciate what is really new in migration and post-migration situations. This perspective clearly teaches us that what we too often consider to be entirely new in the field of migration is on the contrary often linked to previous events. It is therefore crucial to examine historical continuities and discontinuities in order to make sense of contemporary migration patterns and to design scenarios for the future of migration. However, the risk of anachronism must be taken into account in order to avoid systematically reaching the conclusion that nothing is really new in migration and post-migration situations.

Finally, we can compare the insights of the various disciplines interested in researching migration and its consequences. That is what Brettell and Hollifield (2008) do in their edited book *Migration Theory. Taking across disciplines*. They show that the various academic disciplines pose particular research questions; they use different theories and units of analysis. Consequently, they produce different insights on multiple facets of the migration process.

The distinction between different types of comparative migration research we have just discussed is analytical. Researchers often design research that compare different categories of people in different places in different periods of time. However, comparative research in the field of migration and post-migration still needs to be developed. The next paragraph is dedicated to a discussion of the topics and types of comparison that could

be promoted for a better understanding of the various dimensions of the migration process.

6.　　Comparative Migration and Post-Migration Research: what still needs to be done?

Comparative migration and post-migration research has developed considerably over the past 20 years. Many topics and issues have been covered in a comparative perspective sometimes in very big cross-national research programs financed by the European Union. Other times comparative projects have been smaller. In my view, in the future at least three types of comparisons should be developed further combining comparisons between people and places on a wide variety of issues linked to migration and post-migration situations. As a matter of fact, most issues in migration and post-migration studies would benefit by being examined in a comparative research framework. There are not comparative issues and topics, but only comparative research frameworks and designs.

The first type of comparative research that should be developed further is gender comparative research. Historically, both the issue of gender and the position of women have been too long neglected in migration and post-migration studies (Mahler and Pessar, 2006). This situation has been in part redressed with the emergence of feminist migration studies, which have precisely given a new visibility to women in migration processes. However, there are not yet enough truly gender comparative studies, examining and comparing systematically men and women with reference to specific issues in migration studies such as access to the labor market, access to nationality or cultural expressions, for example. After having neglected or totally ignored women in the migration process, after having moved to the other extreme by focusing exclusively on women, migration and post-migration studies should move more systematically towards a gender mainstreaming approach by systemically paying attention to the potential relevance of female-male comparisons.

The second type of comparative research that should be promoted further concerns city-to-city comparisons. We've seen above that city-to-city comparisons frequently involve the same usual suspect cities, which are often capital cities and gateway cities. The comparative studies have provided very interesting insights and results and shown the role of local contexts

in the migration and integration processes. However, we need to add other cities and towns to the comparative studies. Migration increasingly affects all types of cities and not only gateway cities and capital cities. Today, migrants also settle in rural areas and not only in industrial regions like in the 1950s and 60s in Northern Europe (Jentsch and Simard, 2009). Of course, there are all sorts of research on many different local settings, but still too few systematic comparisons between the newer and less usual destinations of contemporary migration flows, namely smaller provincial cities and rural areas. These comparisons could be done within the same country or across country lines and even across continents. More south-south city-to-city comparisons would be particularly welcome.

The third type of comparison to be developed is intercontinental or inter-regional comparisons. We have very few north-south comparisons. Since many countries are simultaneously countries of immigration, of emigration and/or transit, it would make sense to see how far we could go in comparing, for example, the integration of newcomers in Morocco and in Spain. But further, I would like to make the case for the strengthening of transatlantic migration and post-migration studies, though specifically a transatlantic dialogue between the USA and the EU. There are certainly many differences between the USA and the EU that need to be taken into account when discussing an academic dialogue on migrations and post-migration situations between these two parts of the world. First, Americans consider themselves to be a "nation of immigrants", while the EU is a relatively young *sui generis* political construction adequately described by Wiener (1998) as a "non-state" composed of at least 28 nations, whose construction was completed before the big immigration waves. This difference is crucial because it frames the context in which immigration and integration happens. In the US, immigration is part of national history. It is at the core of the construction of the American nation even though there is a recurrent debate about the contribution of migration to society and about the necessity of attracting migrants in the future. Compared to this, in most EU countries immigration is still considered as an unwanted or unplanned addition to national societies constituted long before the arrival of migrants. In the US much more than in the EU, immigrants are considered to be citizens in the making, access to citizenship being the logical end of the migratory career (Martiniello and Rea, 2011).

Second, the US was – to put it in a simple and superficial way – a European colony for many years, whereas several member states of the EU were

colonial or even imperial powers until the second half of the twentieth century. These different colonial and post-colonial experiences are related to current debates on immigrant integration and management of diversity. In particular, political participation and representation of minority groups in both societies is dealt with in different fashions, in part a question of different colonial traditions. In some European countries, "savoir-faire" in managing relations with colonized peoples was transferred to the metropolis to manage relations with immigrants.

Third, despite the many efforts undertaken on both sides of the Atlantic in terms of legislation and policies, ethnic and racial discrimination have persisted in both societies. However, there is nothing comparable to the historical American divide between blacks and whites in the EU. The legacy of slavery and racial segregation remains tangible in the US and it remains relevant in understanding the debates over the integration of immigrants even in the Obama era.

Fourth, the place of religion in society and politics remains quite different in the US and in the EU. In the US society, asserting a religious identity and displaying religious convictions in public is considered to be normal and not necessarily problematic. On the contrary, expressions of atheism are not well accepted socially. It is no surprise in the "Nation under God". On the contrary, in several EU counties where the sociological secularisation process in society was particularly powerful, the public expressions of faith often cause controversies and debates even though the individual right to a religion is guaranteed. Politically, the US has a long tradition of protecting religious minorities, many of which were expelled from Europe in the past. The principle of a separation of politics from religion is not understood in the same way in Europe and in the US. It is formally understood in a strict sense in the US and in some European countries like France. This is much less the case in many European countries like Greece, Germany and the Netherlands, just to take three examples. But de facto the idea according to which the political arena should be "religion-free" remains more potent in Europe than in the US. Those differences are crucial to understanding the different ways in which both societies respond to religious claims made by immigrant communities.

Fifth, in general terms, there are huge differences between welfare provisions and the social security systems in the US and in the EU even though a process of relative convergence has probably started. In some EU countries,

unemployment benefits are provided for a long period of time. Access to health services is easier and cheaper than in the US. The same holds for access to education from pre-school to university. These differences have an impact both on the economic integration of immigrants and also on the attitude of the local populations towards immigrants. In the EU more than in the US, immigrants are often unfairly accused of taking advantage of the welfare system.

Sixth, the question of national unity is not really relevant in the American context. Apart from some very marginal political groups, nobody seriously questions the unity of the state. It is of major concern in several EU member states such as Belgium, Italy, and Spain and, to a lesser extent, the United Kingdom. Autonomous, regionalist, separatist and nationalist movements challenge either the European integration process or national unity at the highest levels of political institutions. Belgium is probably the most notable example in that respect. The longstanding dispute between French-speaking and Flemish-speaking Belgians is far from being settled and it jeopardizes the permanence of the state that hosts the capital city of the EU. Seeking integration in a disunited society or in a society characterized by a relatively strong national identity is certainly not the same.

This list of differences between the US and the EU is not exhaustive. However, it is obvious that they have an impact on the migration and integration process and also on the public debates on immigration and integration. But beyond this, there are also similarities between the two societies that call for a dialogue between them. Both the US and the EU are magnets for millions of potential immigrants from different geographical regions. Immigration from Latin America is stronger in the US and immigration from Africa is more important in the EU. But migration patterns and routes are increasingly diversified and despite economic, financial and social crises, both societies continue to attract migrants year after year. Very little is expected to change in the future. As a consequence, both the US and the EU are *de facto* multicultural, multiracial, multi-ethnic and multi-faith societies. The US has entered a process of diversification of its diversity (Hollinger, 1995) while the EU has stepped into "super-diversity" (Vertovec, 2007) even though the configuration of diversity is different in each case. Both in US and in EU cities similar contradictory trends can be observed. On the one hand, ethnic, racial and religious separation and segregation are a reality. But, on the other, intercultural, interracial and interfaith exchanges are also developing. Trends towards fragmentation and trends towards cohesion

and integration develop in parallel, even if the economic crisis favours the former. The growth of economic inequalities is another common feature of both societies. Poverty, exclusion and marginalization are on the rise and they affect immigrants, ethnic minorities and majorities differently. One thing is sure: when economic inequalities and ethnic divisions overlap, the risk for ethnicized social conflicts is much higher.

Beyond differences and similarities, the US and the EU seem to face the same old challenges: how to manage both internal and international populations movements? How to integrate an increasingly diverse society shaped by migration? How to combine the respect for diversity with social and economic cohesion? The issue of the integration of immigrants is part of this broad challenge by which both societies need to rethink their democratic pluralism. They, therefore, would both gain by learning from each other how to respond to the same questions in different contexts. In my view, a journal like *Journal of Comparative Migration Issues* could take on this challenge but it should certainly move much further in the direction of broader and world scale comparisons including south-south comparisons.

It is undisputable that a journal like the *Journal of Comparative Migration Issues* is welcome in the densifying forest of publications on migration and post-migration situations in order to take up the challenges of comparative research in this field. This first issue illustrates in part the variety of topics and issues that can lead to comparative research as well as the various types and scopes of comparisons for a better knowledge of past, present and future migration dynamics.

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About the author

Marco Martiniello,

FRS-FNRS and CEDEM, University of Liège, Liège, Belgium.

E-mail: M.Martiniello@ulg.ac.be.

Ph: 00 32 (0)4 366 30 40 - Fax:00 32 (0)4 366 47 51

Naturalization Dynamics in Immigrant Families

Alex Street

Abstract

In recent decades millions of people have migrated to the democracies of North America and Western Europe. Some of these immigrants have become citizens of their new homelands, while others remain foreign residents. This article shows that the family context shapes decisions over naturalization. The costs and benefits of becoming a citizen of one's country of residence depend, in part, on the naturalization decisions of immediate family members. The article draws on evidence from interviews and census data in Austria, and extends the analysis to the USA in order to test the scope for the argument to generalize. I conclude by discussing what family-level dynamics in naturalization can teach us about the concept of citizenship.

Keywords: Citizenship, Immigration, Family

1.   Introduction

One in eight residents of the typical OECD member state was born in another country.[1] Some of these immigrants have now become citizens of their new homelands, while many others remain foreign residents. Studying why some immigrants naturalize, while others do not, promises to enhance our understanding of the conditions that promote the political incorporation of immigrants. More broadly, research on naturalization provides a fresh angle from which to consider the meaning of citizenship in contemporary democracies.

In this paper I show that studying naturalization behavior in the context of the family can help us understand why people naturalize. This focus on the family also has novel implications for our understanding of citizenship.

The paper draws on census data and interviews from Austria, and then tests the scope for the argument to generalize by extending the quantitative analysis to the USA. These two countries have very different immigrant populations and citizenship regimes. Yet in each case the family context shapes naturalization behavior. Foreign residents who live with other people who have naturalized are more likely to have naturalized themselves. Often, multiple family members acquire citizenship in the same year. The finding that the decision to naturalize depends on the behavior of other family members suggests that attachments to particular people mediate the relationship that citizenship establishes between the individual and the state.

The next section of the article describes approaches that other scholars have taken to the study of citizenship and naturalization. I argue that the decision to naturalize has implications for one's family members, and that we should expect foreign residents to take these effects into account. I then describe the advantages of combining qualitative and quantitative evidence in research on naturalization, and introduce the Austrian and US case studies. The subsequent three sections present evidence from interviews in Austria, from Austrian census data and from census data in the USA. The penultimate section of the article compares findings from the two countries, and in the conclusion I discuss the implications of the research for our understanding of citizenship.

2.   Existing research on citizenship and naturalization

Citizenship is at the heart of democratic politics. The attendant civil rights grant citizens the protections of the law, while political rights allow citizens to influence which laws are adopted.[2] Most residents of contemporary democracies were born into their current citizenship, having inherited citizenship from their parents or acquired it by place of birth (Waldrauch, 2006). Viewed as a birthright, citizenship is easily taken for granted (Shachar, 2009). Indeed, the presumption that residents should have citizenship is apparent in the very word 'naturalization' (Smith, 1997). But citizenship is too important to be taken for granted. Studying the behavior of immigrants, who face a choice over citizenship, can help scholars answer important questions. Which aspects of citizenship do immigrants value highly enough that they are persuaded to naturalize? Which features of the social and political context help to convince foreign residents that they can and should become citizens of their country of residence? In this article I offer some

novel answers to these questions, by studying family-level dynamics in naturalization, where each person's decision to naturalize depends, in part, on the decisions of others in the family.

Existing research on naturalization has tended to focus either on citizenship laws (e.g. Howard, 2009; Janoski, 2010) or on individual decision-making (e.g. DeVoretz, 2008; Kahanec & Tosun, 2009). Citizenship laws determine who gets citizenship at birth, and also establish the criteria that people wishing to naturalize must meet. Immigrants who aim to naturalize must typically provide evidence of a minimum period of residence and of economic self-sufficiency, and must show proof of integration, for example by passing a language or civics test (Goodman, 2012). Immigrants must also decide whether the benefits of naturalization—including irrevocable residence rights, access to all sectors of the labor market, and political rights—are worth the costs and administrative trouble. Scholars have shown that naturalization rates are higher among refugees, who are unlikely to return to the country of origin. Naturalization is also more likely among immigrants who have lived in the country for many years, those who are more educated, and those who are more interested in political participation (Bloemraad, 2006; Ramakrishnan & Espenshade, 2001; Portes & Curtis, 1987; Vink, Prokic-Breuer & Dronkers, 2012). Some research suggests that the prospect of losing one's citizenship of birth discourages naturalization, though others dispute this claim (Anil, 2007; Jones-Correa, 2001; Mazzolari, 2009; Scott, 2008).

Scholars have paid relatively little attention to social dynamics that operate between the micro-level of the individual and the macro-level of the polity. However, there are strong reasons to expect that social dynamics shape naturalization behavior. First, the costs of naturalization may be lower, when others are also naturalizing. This could be true, for example, if information about the naturalization procedure spreads within immigrant communities, or if immigrants are able to help each other apply. Second, the benefits of naturalization may be greater, when other foreign residents are also naturalizing. For instance, the influence of immigrant-origin residents as a voting bloc will increase, as more people naturalize. Immigrants may be more inclined to naturalize in order to facilitate travel, if their friends or family members are also naturalizing, since it is often preferable to travel along with one's family or friends.

Interpersonal dynamics in the decision to naturalize should be especially pronounced within the family. People who naturalize are often eligible to 'extend' citizenship to their immediate family, meaning that spouses and minor children can naturalize for reduced fees or without having to meet

the standard requirements. As a result, parents who expect their children to benefit from acquiring citizenship while young may naturalize for the sake of their children. The sense of legal security that comes with citizenship may be all the more valuable, if one's family members are also able to naturalize. Hence family members may prefer to naturalize together. People with higher incomes can help to pay the fees for family members applying to naturalize, and those who are better at dealing with bureaucratic requirements may take charge of the paperwork for the whole family. Finally, immigrants may even be motivated to naturalize in order to sponsor family members living abroad to join them in the country. In short, the decision to become a citizen of one's country of residence has implications for one's family, and we should expect these effects to be taken into account by people facing a decision over naturalization.

Legal scholars have recognized that citizenship laws rely heavily on attribution within the family, and that many countries facilitate naturalization through marriage. Indeed, Knop (2001) argues that scholars should pay greater attention to the ways in which the legal recognition and regulation of family relationships have impinged on citizenship laws. Knop argues that more research is needed on 'relational nationality.' As yet, however, few empirical studies of naturalization have heeded this call.

Scholars have used both qualitative and quantitative research methods to study naturalization behavior. Qualitative studies, often based on interviews, more often emphasize social dynamics. For example, Bloemraad (2006) uses interview data to show how immigrants draw on resources from immigrant communities, and from the state, in order to meet the costs of naturalization.[3] Alvarez (1987) identifies ties to family members in the country of residence as a factor leading to naturalization, though Anil (2007) notes that family ties may encourage immigrants to remain in the country but do not always suffice to prompt naturalization. Topçu (2007) provides evidence of family members helping each other naturalize, but also of disagreement within families over the value of becoming a citizen of the country of residence. De Hart (2010) shows that parents, especially mothers in inter-national marriages, care deeply about the citizenship status of their children. Levesley (2008, p. 30) notes that having children can serve as a 'catalyst' that prompts foreign residents to naturalize. Revealing as these studies are, none of them provides broad evidence on the numbers of people who are prompted to naturalize, or are dissuaded, depending on the implications of the decision for their family members.

Several quantitative studies emphasize social dynamics in explaining why foreign residents naturalize, though the available data often make

it difficult to provide direct evidence on the posited mechanisms. For example, owning property in the country of residence is seen as evidence of having put down roots in the host society (e.g. Portes & Curtis, 1987), but could simply indicate wealth. Using data from the 1970s, Yang (1994) reports higher naturalization rates in the USA among immigrant groups that are larger in number and more concentrated in urban areas, but provides no direct evidence for his claims that this is because larger migrant groups are more likely to assimilate, or that urban concentration speeds the flow of information about naturalization. Liang (1994, p. 431) notes that immigrants who live in the same household as others who have naturalized are more likely to have naturalized themselves, but provides no evidence to support his claim that this is because family members share 'social capital,' which 'reduces the anxiety and cost of naturalization and facilitates the actual process.' One way to provide stronger evidence on social dynamics in naturalization behavior is to combine quantitative and qualitative methods, in order to supplement data on variation in citizenship status with evidence on the mechanisms behind the observed patterns.

3. Cases, data and methods

In order to advance our understanding of social dynamics in naturalization behavior, and especially the role of the family, this paper presents evidence from both interviews and census data. Interviews with immigrant-origin residents of Austria provide insights on the reasons why people naturalize. Analysis of Austrian census data allows me to test the prevalence of these motives, by comparing the characteristics of immigrants who have naturalized with those of people who have not. I take advantage of the fact that the census data contain information not just on individuals but on entire households, allowing me to study naturalization behavior in the family context. Finally, I also subject the arguments developed in this paper to further testing, by comparing the findings from the Austrian case with evidence from census data in the USA.

The recent history of immigration to Austria has close parallels to that of other Central and West European countries. The country is home to around 1.2 million people who were born abroad, and a further 250,000 who were born in Austria to immigrant parents (many of whom inherited foreign citizenship, since the country does not automatically grant Austrian citizenship to people born in the country). Together, immigrants and their children account for around 17% of the total population. Like Germany,

Austria recruited 'guest workers' from the former Yugoslavia and Turkey to help fuel the booming economy of the 1960s. Although many of the 'guests' returned to their countries of origin, some stayed and later brought family members to join them (Gürses, Mattl-Wurm, & Kogoj, 2004). Austria is also similar to countries such as France, Spain and the UK, in that it is home to relatively many immigrants from the former empire, especially the former Yugoslavia. Austrian citizenship law is typically seen as restrictive, because of the lack of a provision for citizenship by birth in the country, and because immigrants who wish to naturalize are required to have lived in the country for many years, to pass strict integration tests and to pay high fees (Çınar, 2010; Perchinig, 2010). However, Austrian citizenship law does make it relatively easy for the family members of people who naturalize to acquire citizenship. Minor children of people who naturalize are automatically eligible for citizenship, and it is also relatively easy to 'extend' citizenship to one's spouse (Çınar, 2010; Mussger, Fessler & Szymanski, 2001).

I conducted a total of 36 interviews in Austria. 21 of the interview subjects were immigrant-origin residents, twelve of whom (57%) held Austrian citizenship. Of the remaining interviewees, three were politicians who spoke for their parties on citizenship law, six were civil servants who administered citizenship law, and seven worked for NGOs that provide advice on naturalization. Interview subjects were recruited using snowball sampling: initial contacts at migrant organizations in three regions were asked to suggest other people who would be willing to talk.[4] Snowball sampling is an efficient way to recruit uncommon and possibly reluctant interview subjects, but is liable to result in a non-representative sample. Because it is difficult to assess the uncertainty involved in drawing inferences from the non-representative sample, in this paper I use interview data only to illustrate the mechanisms at work. Hence I do not report the frequency with which particular motives were reported.

I supplement the interview data with evidence from the Austrian micro-census, a large quarterly household survey. Participation is obligatory, and the sample is representative of the resident population (Stadler & Wiedenhofer-Galik, 2008). I use data from the spring of 2008, when a special module was included with questions for immigrants and the children of immigrants. This allows me to identify both foreign residents and naturalized Austrians. Although many scholars have used census data to study individual-level variation in citizenship status, few have exploited the household-level structure of these data to study patterns within the family.[5] In order to make use of this information, I constructed indicators showing the proportion of household members who have naturalized, and

also whether each person naturalized at the same time as any others in the household. Evidence on simultaneous naturalizations provides stronger support for the claim that decisions to naturalize are interdependent within the family. One would expect to observe *some* clustering of citizenship status, at the household level, simply because family members share various characteristics. The fact that family members often naturalize in the same year implies that there are social dynamics at work that go beyond mere similarity within households.

Finally, I conduct an initial test of whether mechanisms similar to those at work in Austria also apply in the USA. The USA also has a large foreign-born population, around 13% of the total population. US citizenship law is liberal, with automatic citizenship for anyone born in the country and relatively easy naturalization. As in Austria, the minor children of parents who naturalize also 'derive' a right to citizenship. The advantage of comparing Austria with a country with very different citizenship laws is that this provides a hard test of the claim that the family context shapes naturalization behavior under a broad range of conditions. The family context should not be expected to have identical implications across cases, however. For example, citizenship of the USA is granted to anyone born in the country, under the principle of *jus soli*. This helps to ensure that relatively few children grow up in the country as foreigners. In contrast, in countries like Austria that do not apply *jus soli*, many immigrant parents have an incentive to naturalize in order to ensure that their children grow up with citizenship of the country of residence. One would expect parents in both countries to take account of the implications of the decision to naturalize for their children, but this may play out in different ways. In order to provide an initial test of this argument I analyze census data from the USA, namely from the 2009 American Communities Survey (ACS). Again, these data provide information on entire households, and I created indicators for each household to record simultaneous naturalizations.

4.   Findings from interviews in Austria

When asked about the decision over naturalization, many interview subjects in Austria reported that other family members had been involved. The account of a Turkish-origin woman, who works in a public relations company in Vienna, provides an example of social dynamics in naturalization.[6] She said that her mother had naturalized in the early 1990s, along with her three children. The family took advantage of a provision allowing parents who

naturalize to 'extend' citizenship to their children. The parents wanted their children growing up in the country to hold Austrian citizenship. The interview subject said she was glad to have naturalized together with her mother and siblings, since it would have been more difficult to do so on her own. This woman's father chose to retain his Turkish citizenship, however, since he was worried that he would not otherwise be eligible for an Islamic burial in Turkey. The interview subject said that her father sometimes appears to regret his decision. He is interested in Austrian politics, but frustrated to have no right to vote: 'And without a vote... somehow you don't really exist.' This statement illustrates what is at stake in the decision over naturalization.

Another interview subject, originally from Iran, recounted how she had benefited from the provision allowing citizenship to be 'extended' to spouses.[7] She was eager to naturalize but, without a job at the time, was not eligible. However, a helpful civil servant pointed out that it would be possible for her to become an Austrian citizen by extension if her husband naturalized. He did so, and the woman explained that it was a 'relief' for the two of them to have the security of citizenship, before she had her first child. Help from family members is not always sufficient to allow people to naturalize, however. One student described the efforts of her parents to help her meet the requirements, which became more demanding after a reform of citizenship law in 2006.[8] Her parents began transferring a regular sum to her bank account so that she could show that she met the minimum income requirement, but civil servants were not convinced that the transfers would continue. The student portrayed the pursuit of citizenship, with the help of her parents, as a collective endeavor, and spoke on behalf of her family in saying that they were 'extremely frustrated' by the difficulty of the procedure. An employee of an NGO that provides immigrants with advice on citizenship explained to me that the high fees and minimum income standards mean that it is now 'all but impossible' for low-income immigrants to naturalize.[9]

A senior official in the administration of Austrian citizenship law told me that 'In Austria we make citizenship easier for family members because we have a traditional view. We see the family, not the individual, as the basic unit of society.'[10] He said that this principle has become less important since a reform of citizenship law in the year 2006, which requires that each applicant for citizenship meet new integration requirements. Nonetheless, immigrant interview subjects reported that civil servants appear more receptive to applications for naturalization that include all family members. One immigrant from Morocco, who naturalized with

her spouse and daughters, explained that the bureaucratic preference for unitary citizenship in the family matched her own belief that 'things are just easier' when family members all hold the same citizenship.[11]

Not all of the people interviewed wanted to become Austrian citizens. One explained that she sees few benefits in doing so, since naturalization is expensive and she has many rights as a permanent resident.[12] Her mother also lives in Austria as a foreign resident, and the interview subject sees their citizenship (of Bosnia-Herzegovina) as a tie between the two of them. Another foreign resident who does not wish to naturalize, because he still feels attached to his country of birth, Serbia, said that he was nonetheless glad that his children had grown up with Austrian citizenship, inherited from his Austrian wife.[13] It should also be noted that family ties were not the only factors that interview subjects discussed as reasons for or against naturalization. Other considerations included a desire for fully secure residence rights, and the fact that many immigrants can travel more easily with an Austrian passport.

In sum, the interviews conducted in Austria provide examples of many ways in which family members can influence each others' decision to naturalize. Family members can help each other pay the required fees or overcome administrative difficulties. Some people feel more comfortable as citizens of a new country, if other family members also become citizens. The legal security of citizenship is valued all the more when it is shared with members of one's immediate family. Some parents naturalize for the sake of their children, and some spouses naturalize for the sake of their partners. I now turn to census data to provide evidence on the prevalence of these patterns.

5.   Findings from Austrian census data

Table one provides an overview of the people living in Austria as foreign residents or naturalized citizens (whom I describe, for the sake of brevity, as the immigrant-origin population). The table reveals that the immigrant-origin population is well established in Austria, with the average member of this group having lived in the country for over 20 years. Roughly one in five immigrant-origin residents was born in Austria. Most were born, or have parents who were born, in Western or Eastern Europe, or in the Balkans. We also see that around two in five now hold Austrian citizenship.

Table 1.   Immigrant-origin population of Austria, as of 2008. Source: Austrian Micro-Census, Quarter 2, 2008. Estimates to the nearest thousand; all calculations by the author. 'Immigrant-origin' refers to foreign residents and people who have naturalized.

Country/region of origin	Number of residents	% born in Austria	Mean years of residence	% with Austrian citizenship
E. Europe	237,000	9%	25	47%
W. Europe	243,000	11%	23	22%
Turkey	212,000	25%	17	49%
Former Yugoslavia	451,000	23%	20	34%
Other	225,00	25%	18	47%
TOTAL	1,368,000	19%	21	39%

The census data can be analyzed for information on the distribution of immigrant-origin residents across households. The data reveal that 10% live in single-person households, and an additional 18% live as the only foreign resident or naturalized citizen in a household otherwise made up of native-born Austrian citizens. Among those who live with other immigrant-origin residents, citizenship status is clustered by household. Just 13% of those who live with other immigrants, none of whom have naturalized, now hold Austrian citizenship themselves. Conversely, 61% of those who live with at least one other person who has naturalized are also now Austrian citizens. Figure one shows naturalization patterns across households with varying numbers of immigrant-origin residents. In the top-left panel of the figure, we see that 28% of those who live with one other immigrant-origin resident, who hasn't naturalized, are now Austrian citizens themselves, whereas 60% of those who live with someone who has naturalized are also Austrian citizens. In the other panels we see that living with others who have naturalized becomes an increasingly strong predictor of citizenship status, in households with more immigrant-origin residents. In households with four immigrant-origin residents, for example, the share with Austrian citizenship is just 2% when no others have naturalized, compared to 97% when all three of the other people have become Austrian citizens.
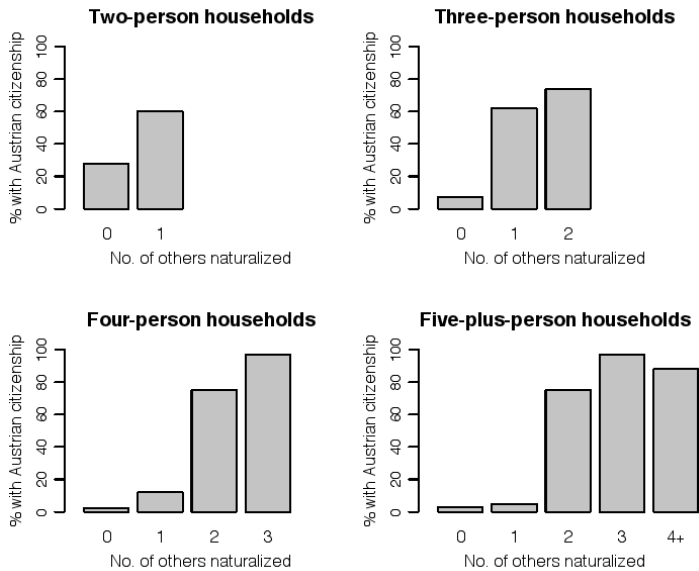
Figure 1. Immigrant-origin residents of Austria, who live with others who have naturalized, are more likely to have naturalized themselves.
Source: Austrian Micro-Census, Quarter 2, 2008. All calculations by the author. The number of persons in the household refers to people for whom the question over naturalization applies, i.e. foreign residents or naturalized citizens.

It is important to establish whether this association between each person's citizenship status, and that of others in the household, is also robust in multivariate models that control for other factors related to naturalization. Table two presents the results of two statistical models, which predict the citizenship status of immigrant-origin residents based on their characteristics and the contexts in which they live. Both models include variables that existing research has shown to be associated with naturalization, including gender and marital status, age and length of residence, country of birth, educational attainment and property ownership. I also include indicators to account for variation across the Austrian states. The first model achieves quite good fit, correctly predicting an additional 50% of cases, compared to the baseline of predicting that every person in the data falls into the modal outcome category (in this case, that means predicting that nobody has naturalized). The second model is identical to the first, but also includes a variable indicating whether the person in question lives with anyone else who has naturalized. We see that the coefficient is positive and highly significant, and that including this one additional variable leads to a substantial improvement in the fit of the model, which now correctly

predicts an additional 60% of cases, compared to the baseline. Based on the estimates from model two, the predicted likelihood of holding Austrian citizenship is 0.38 for a typical immigrant-origin resident who lives with no others who have naturalized, compared to 0.82 for an otherwise similar person who lives with at least one other naturalized Austrian citizen.[14]

Table 2.　Logistic models of Austrian citizenship status. Note: the table reports point estimates and standard errors (in parentheses) from logistic regressions fit by iteratively re-weighted least squares. Standard errors are clustered by household. ** indicates significance at p<0.01, * indicates p<0.05. Model 2 is the same as Model 1 except that it also includes a dummy variable for those who live with others who have naturalized. The education reference category is no certificate or only primary schooling, and includes those still in school. Dichotomous variables are indicated with (0/1). The data source is the Austrian micro-census data from the second quarter of 2008, with the analysis restricted to households that provided information for all household members.

	Model 1	Model 2
Female (0/1)	0.33**	0.30*
	(0.10)	(0.12)
Married	0.02	-0.27
	(0.13)	(0.14)
Log age	-0.99**	-1.03**
	(0.23)	(0.24)
Log years in country	2.60**	2.83**
	(0.18)	(0.20)
Born Austria (0/1)	1.00	1.14
	(0.69)	(0.71)
Log years in country*Born in Austria	-0.55**	-0.62**
	(0.20)	(0.21)
Secondary education (0/1)	0.45**	0.53**
	(0.15)	(0.15)
University (0/1)	0.42*	0.48*
	(0.18)	(0.19)
Owner-occupied housing (0/1)	0.66**	0.58**
	(0.17)	(0.15)
Live with other(s) who have naturalized (0/1)	-	2.03**
		(0.23)
Region of origin fixed effects	yes	yes
State fixed effects	yes	yes
Constant	-4.95**	-6.06**
	(0.66)	(0.69)
No. of individuals	2520	2520
Log-likelihood	-1086	-983
Percentage Reduction in Error	50%	60%

Finally, I make use of information on the timing of naturalization to support the claim that the clustering of citizenship status by household reflects interpersonal dynamics, rather than merely the similarity of people who live together. As was noted above, 61% of those who live with one or more others who have naturalized are Austrian citizens themselves. In two thirds of these cases, the people involved naturalized in the same year. This suggests that these family members reached a collective decision over naturalization. Following my argument, one would also expect simultaneous naturalizations to be concentrated in family-based households, as opposed to households made up of unrelated individuals. Indeed, this is what we find: just 2% of those who have naturalized, and live in non-family-based households, became citizens at the same time as one of their housemates. Consistent with the interview data showing that children are often included in the citizenship applications of their parents, we also find that simultaneous naturalizations are common among those living with their parents. 75% of immigrant-origin children living with someone who has naturalized have become Austrian citizens themselves, and in five out of six cases they acquired citizenship in the same year.

To summarize the results thus far, the evidence from interviews in Austria revealed some of the ways in which family members can stimulate each other to naturalize, or help each other through the process of acquiring citizenship. The Austrian census data showed that this kind of social dynamic is quite common in naturalization behavior. People are more likely to have naturalized, if they live with others who have taken this step. Often, multiple family members acquire citizenship of their country of residence in the same year.

6.   Findings from US census data

In this section of the paper I present evidence of household-level naturalization dynamics in the USA. I begin by providing an overview of the foreign-born population, i.e. the group of people for whom the question of naturalization arises.[15] Table three provides descriptive statistics.

Table 3. Foreign-born population of the US, as of 2009. Source: American Communities Survey 2009. Estimates to the nearest thousand; all calculations by the author. Note that Asia is defined to include Australasia.

Country/region of origin	Number of residents	Mean years of residence	% with US citizenship
Africa	1,505,000	13	43%
Americas (excluding Mexico)	9,931,000	21	43%
Asia	10,732,000	18	57%
Europe	5,163,000	27	59%
Mexico	11,580,000	17	22%
TOTAL	38,911,000	19	43%

We see in table three that the mean length of residence, for the foreign-born population of the USA, is almost 20 years. Around two in five are now US citizens. The share with citizenship is lower for Mexican immigrants, at least in part because many are undocumented. It is estimated that around six and a half million Mexicans live in the USA without authorization (Taylor, Lopez, Passel & Motel, 2011). Note that, because of the *jus soli* provision in the US, there is no need for a column showing the proportion of foreign residents who were born in the country.

As in the Austrian case, I make use of the household-level structure of the census data to describe family dynamics in naturalization behavior. The data reveal that 9% of the US foreign-born live in single-person households, and an additional 16% are the only immigrants in households that also contain US citizens. Focusing on those who live with other immigrants, we see that citizenship status is clustered by household. Just 13% of those who live with other immigrants, but with no naturalized citizens, are US citizens themselves. In contrast, 69% of those who live with one or more naturalized citizens have naturalized themselves. Figure two presents information on the clustering of citizenship status, broken down by the number of immigrants in the household. The top-left panel shows that, in households with two immigrants, the share with US citizenship is 78% if the other person has naturalized, compared to 21% if he or she has not done so. The other panels show that an immigrant is increasingly likely to have become a citizen, as the number of other naturalized citizens in the household rises.
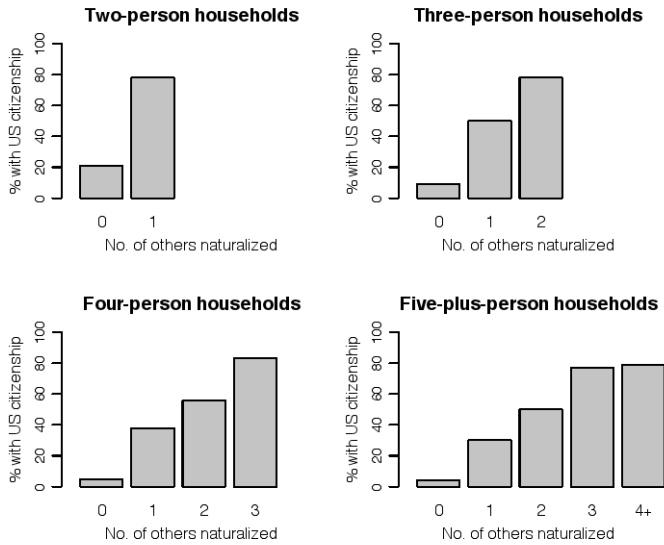
Figure 2. Immigrants in the US, who live with others who have naturalized, are more likely to have naturalized themselves.

Source: American Communities Survey 2009. All calculations by the author. The number of persons in the household refers to people for whom the question over naturalization applies, i.e. foreign residents or naturalized citizens.

In order to test whether the household-level clustering of citizenship status is due to other factors that make people more or less likely to naturalize, table four reports the results of logistic models of citizenship status. The models include variables that existing research has shown to be associated with naturalization, such as gender and marital status, age and length of residence, country or region of birth, educational attainment and property ownership in the USA. I also control for variation across US states. Model three achieves good fit, correctly predicting an extra 57% of cases, compared to the baseline prediction that everybody falls into the modal outcome category. Model four is similar to model three, but also includes a variable indicating whether the person lives with anyone else who has naturalized. The coefficient is positive and highly significant. Including this variable improves the fit of the model, up to 61% reduction in error. Based on the coefficients from model four, the predicted likelihood of holding US citizenship is 0.41 for a typical immigrant-origin resident who lives with no others who have naturalized, compared to 0.76 for someone who lives with at least one naturalized US citizen.[16]

Table 4. Logistic models of holding US citizenship. Note: the table reports point estimates and standard errors (in parentheses) from logistic regressions fit by iteratively re-weighted least squares. Standard errors are clustered by household. ** indicates significance at p<0.01, * indicates p<0.05. Model 2 is the same as Model 1 except that it also includes a dummy variable for those who live with others who have naturalized. The education reference category includes those with no qualifications and people too young to have finished school. Dichotomous variables are indicated with (0/1). The data source is the American Communities Survey, 2009.

	Model 3	Model 4
Female (0/1)	0.21**	0.23**
	(0.01)	(0.01)
Married	0.12**	-0.01
	(0.01)	(0.01)
Log age	-0.12**	-0.22**
	(0.02)	(0.02)
Log years in country	1.79**	1.87**
	(0.01)	(0.01)
Secondary education (0/1)	-0.73**	0.67**
	(0.02)	(0.02)
University (0/1)	-0.16**	0.03
	(0.02)	(0.02)
Owner-occupied housing (0/1)	0.64**	0.33**
	(0.01)	(0.01)
Live with other(s) who have naturalized (0/1)	-	1.53**
		(0.02)
Region of origin fixed effects	yes	yes
State fixed effects	yes	yes
Constant	-4.40**	-4.50**
	(0.15)	(0.14)
No. of individuals	333,230	333,230
Log-likelihood	-17320726	-15977788
Percentage Reduction in Error	57%	61%

Finally, I again turn to information on the timing of naturalization. As was reported above, 69% of immigrants who live with one or more other people who have naturalized have become US citizens themselves. In two fifths of these cases, the people in question became US citizens in the same year. This is much higher than would be observed due to chance alone, if the timing of naturalization among people living together were independent. However, this share is lower than the equivalent figure in Austria (two thirds). In other words, in the USA it is relatively common for multiple household members to have naturalized, but for some to have taken this step earlier than others. The US census data also show that simultaneous

naturalizations are observed almost exclusively in family-based households: only 4% of those who have naturalized, and live in non-family-based households, became citizens at the same time as one of their housemates. We also see that simultaneous naturalizations are relatively common among children. 71% of immigrant children living in a household where others have naturalized, have also become US citizens. And in three out of five of these cases, they became US citizens in the same year as at least one other household member.

7.   Discussion

This paper provides evidence that many immigrants obtain citizenship of their country of residence because other family members naturalize and include them in the process. Others receive help and encouragement from their family. The combination of interviews and census data, from the Austrian case, provided the clearest evidence of family-level dynamics, and the analysis of census data from the USA suggested that similar forces are at work even in a country with a very different immigrant population and citizenship laws.

Comparing the findings from the two cases suggests a number of areas for further research. The association between naturalization, and living with others who naturalize, is stronger in Austria than in the USA. This is clear from comparing figures one and two, and tables two and four. Comparing the two figures we see broad parallels, but also some differences. First, the association levels off at a lower rate, in the USA. In households where several people have naturalized, in Austria, the remaining person is almost certain to have naturalized. Whereas in the USA, even if all of the others in the household have naturalized, the percentage with US citizenship peaks at around 80%. A second difference is that, in larger households in Austria, the clustering of citizenship status rises sharply, once two others have naturalized. In the USA, the rise is more gradual. These differences can be explained, at least in part, by the fact that many of the larger households in Austria contain children born in the country without Austrian citizenship. These children are often included when their parents naturalize. In the USA, however, birthright citizenship limits the number of children growing up without US citizenship. Hence in the USA, the households with many immigrants often include more distant relatives such as aunts, uncles or grandparents, who are less likely to naturalize at the same time as each other.

The variable indicating the presence of one or more other naturalized citizens also allows for a larger improvement in the fit of multivariate statistical models in Austria than in the USA, as can be seen from comparing tables two and four. Again, this reflects the different composition of multi-immigrant households in the two countries. Additionally, in the US, those who live with other naturalized citizens are more similar in other ways. For example, the length of residence is more similar across household members. For this reason, including the variable indicating that others have naturalized brings less additional predictive power.

These findings reveal the importance of household composition for naturalization behavior. The decision over whether to naturalize plays out in a different context, for people who live with native citizens, for parents who live with their immigrant-origin children, and for those who live with extended immigrant-origin family members. Some of this contextual variation is due to citizenship laws, especially relating to citizenship by birth in the country. More broadly, however, household composition can vary as the result of processes of adaptation and selection on the part of both immigrants and the receiving society—consider, for example, the case of inter-national marriages. To better understand variation in the distribution of foreign residents across households, and the implications for citizenship, it may be fruitful to link research on naturalization with research on racial and ethnic intermarriage (e.g. Alba and Nee, 2003; Qian and Lichter, 2007). Finally, while this paper's efforts to draw extra information from the household-level structure of census data have revealed new patterns, it should be noted that scholars wishing to study family members who do not live together, or couples unable to marry, will have to draw upon other sources, such as self-reports in surveys of immigrants.

8.   Conclusion

Studying naturalization dynamics in immigrant families has shown that personal ties often influence the decision over whether to become a citizen of one's country of residence. This finding enhances our understanding of immigrant incorporation. Furthermore, the evidence presented here casts new light on the concept of citizenship. Scholars define citizenship as a status of political membership, but many also argue that citizenship involves a feeling of belonging (e.g. Bosniak, 2000; Carens, 2000; Cohen, 1989). It is widely thought that this affective dimension of citizenship is motivated by nationalism, and indeed there is evidence that conceptions of

national identity are linked to popular attitudes on the meaning of citizenship (Citrin, Reingold and Green, 1990; Sniderman, Hagendoorn and Prior, 2004; but see also Bail, 2008). However, loyalty to the nation may not be the only basis for the feeling that one belongs as a citizen. Relations with family members can buttress and may even help to define the more abstract relationship to one's country of citizenship.

Immigrants are in a unique position to help us understand the links between citizenship and feelings of belonging. This is in part because immigrants are among the few people who actually face a decision over becoming a citizen of the country of residence. In addition, the citizenship status of immigrants intersects in a range of ways with other factors that create ties to the country, including relationships with family members who live there. Other scholars have studied immigrants in inter-national marriages. For example, Knop (2001: 111) argues that for a person married to the citizen of another country, family relations 'help to constitute her loyalties to her own state and theirs.' Scholars of transnationalism have shown that transnational ties can influence integration patterns across generations (Jones-Correa, 1998; Levitt, 2001; Vertovec, 2004; Levitt and Jaworsky, 2007). Here, I have provided evidence on the ways in which family ties in households with varying combinations of immigrants and native-born citizens can influence the decision to become a citizen and, as such, a full member of the polity. Future research could build on these findings to study exactly how family ties work to hold political communities together, or indeed how family ties create loyalties that cut across state borders.

Acknowledgements

Notes

1. The number of foreign-born residents in the twenty-eight OECD member states for which data are available is 108.6 million, in a population of 851.7 million. The median share of foreign residents is 13%. See OECD 2013: 360-361.

2. As Rousseau (1997, p. 54) put it, 'obedience to the law one has prescribed for oneself is freedom.'
3. Bloemraad also reports statistical evidence that similar immigrants are more likely to naturalize in Canada than in the US.
4. All interviews were conducted in German by the author. Interviews were conducted in three Austrian regions: 1) Vienna, home to 39% of the country's foreign resident population and 41% of naturalized citizens, 2) Styria, a largely rural state that is home to 9% of the country's foreign residents and 8% of the naturalized, and 3) Carinthia, another mainly rural state that is a stronghold of the far-right Freedom Party, and home to 4% of the country's foreign residents and 3% of the naturalized citizens.
5. Only Liang (1994) makes explicit use of information on other household members.
6. Author interview with Linda S., Vienna, 30 June 2010.
7. Author interview with Salomeh A., Graz, 2 July 2010.
8. Author interview with Elivra K., Vienna, 22 July 2010.
9. Author interview with Gabriele F., Vienna, 14 July 2010. Federal fees for naturalization are now €700 per person, and states charge additional fees ranging from €217 to €760 per person. In addition, applicants must provide evidence that their earnings have been above the minimum wage for the entirety of the past three years.
10. Author interview with Josef F., Graz, 2 July 2010.
11. Author interview with Fatima K., Villach, 7 July 2010.
12. Author interview with Ivana M., Vienna, 30 June 2010.
13. Author interview with Borko I., Vienna, 6 July 2010.
14. To generate predicted probabilities, I define a typical member of the immigrant-origin population as a 33-year-old married woman, born in the former Yugoslavia, who has lived in Austria (in Vienna) for 21 years and has a secondary education.
15. Note that the institution of birthright citizenship means that in the US, only immigrants face the question of naturalization. This contrasts with the situation in Austria, where the foreign resident population includes some people born in the country.
16. To generate predicted probabilities, I define a typical member of the immigrant-origin population as a 39-year-old married woman, from Asia, who has lived in the US for 19 years and has a secondary education.

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About the author

Alex Street, Max Planck Institute for the Study of Religious and Ethnic Diversity.
E-mail: street.alex@gmail.com.

Immigrants and civil rights in cross-national perspective: Lessons from North America

Irene Bloemraad & Doris Marie Provine

Abstract

The degree to which a nation envisions civil rights as applying to *all* residents offers insight into its commitment to and capacity for immigrant inclusion. A much-debated question is whether there is a trend toward convergence in national policies around immigrant inclusion, given globalization and the rise in human rights norms. Or do institutional legacies and domestic politics tend to preserve old approaches? This issue has been investigated most thoroughly in European contexts. Here we examine the cases of Canada and the United States. We find that while Canada and the United States, both settler societies, have much in common, they differ significantly in their historical experience with civil rights, which helps explain differences in how they approach the inclusion of immigrants in their societies. While civil rights has more potential for advancing immigrant concerns in the United States, neither country readily envisions immigrant inclusion as a civil rights issue.

Keywords: immigrant inclusion, civil-rights regimes, language of rights, convergence hypothesis, institutional legacies

1.   Introduction

The growth in migration's scope and diversity has made immigration a newly salient policy issue in some nations, while reinvigorating long-standing debates about immigrants and immigration in others. Whether a new or renewed issue, political leaders face political, economic and social pressures to re-evaluate the rules regarding the entry and integration of immigrants, and also the rights migrants enjoy. Pressures for change are, however, counter-balanced by strong path-dependent processes embedded

in existing law and institutions. Scholars consequently debate whether or not nation states are becoming more alike in how they address immigration.[1] This question has been explored most intensively in Europe in comparative scholarship on immigration laws (Geddes 2003; Messina 2007), citizenship requirements (Brubaker 1992, Vink and de Groot 2010), integration policies (Goodman 2010) and immigrant rights (Soysal 1994; Koopmans, et al 2012).

Some argue for convergence. They identify a trend toward similar policies of entry, integration, and membership. Explanations stress the standardizing role of European institutions, such as the European Union, the European Court of Human Rights and FRONTEX (Geddes 2003), a growing, global human rights regime (Soysal 1994), or converging decisions by domestic courts that seek to adhere to common liberal principles of equality (Joppke 2001).

Others challenge the convergence hypothesis. These scholars argue that institutional legacies tend to lock in each nation's framework for dealing with immigrants (Goodman 2010). Koopmans and colleagues (2012) find more divergence than convergence across eight areas of immigrant rights in 10 European countries from 1980 to 2008. They argue that by 2002 a trend toward inclusiveness had stagnated because of right-wing pushback. Domestic politics frequently reinforce pre-existing arrangements or, when change happens, domestic political pressures push it in diverse directions, not toward legally imposed convergence (Howard 2009; Koopmans, et al 2012).

Although these European nations are diverse in the relative importance of ethnic or civic national imaginaries, colonial histories, and culpability in acts of genocide during World War II, they share a collective history and highly articulated political umbrella. All of them feel the homogenizing influence of EU policy and judicial decisions, even if that influence is not nearly as strong as some of its original architects expected. The normative and agenda-setting role of the EU extends even to non-EU states such as Norway and Switzerland.

But what about patterns of convergence or divergence beyond Europe? Are global forces that favor possible convergence – such as the growing human rights regime and increasing economic integration – at work elsewhere? Or do domestic arrangements create "lock-in" effects that drive the development of law and policy on immigration in nation-specific ways? Asking these questions in a non-European context promises to broaden the insights from existing research and encourage further reflection on the European case.

We take up this challenge by focusing on two neighboring immigrant-receiving states, Canada and the United States. We compare the two countries from the vantage point of civil rights policy. The political struggle in each nation over civil rights has been over who counts as a member, which, in effect, makes civil rights a measure of immigrant inclusion. A 'national models' perspective draws our attention to the political traditions and institutional arrangements that could create distinct trajectories in each country. Yet even those who take a strong national models approach in Europe acknowledge that in some areas, such as anti-discrimination law, we see a general trend toward expanded rights for immigrants and their descendants (Joppke 2007; Koopmans, et al. 2012), a convergence trend that might also affect North American nations.

The United States and Canada offer a particularly fruitful comparative framework in this regard (Bloemraad 2011). Both countries are settler societies characterized by a long history of immigration and similarities in language, economy, culture, and legal tradition. Yet we show that civil rights regimes—formal rules and systems, but also the taken-for-granted conceptualization of rights—are shaped by domestic legal systems, political institutions, and past responses to longstanding minority/ majority conflicts. Our analysis largely underscores the significance of historical institutions and ideological legacies in contemporary political struggles over immigrant civil rights, much like analyses of "locked-in" or path-dependent effects in European nations. We also find, however, some evidence of convergence traceable to both internal and external forces for liberalization.

Our analysis begins by defining "civil rights" broadly enough to permit comparative analysis. We turn then to the evolution of civil rights as an institutional and ideological project in each nation, demonstrating important differences between Canada and the United States in the role of courts as arbiters of conflict, in the relative importance of individual versus group rights, and in the extent to which the language of "rights" carries legitimacy in the public sphere. The final section suggests how these differences affect immigration policy and advocacy for immigrant rights in each country.

2.   What are "Civil Rights"?

Articulating a definition of civil rights precise enough for analysis, but broad enough to apply cross-nationally forces us to theorize concepts carefully, one of the benefits of a comparative approach. In the United States, a written Constitution and Bill of Rights, combined with a 'separation of

powers' system that gives substantial weight to judicial review, have made rights claims and court cases a central part of struggles for full citizenship throughout U.S. history. Canada, in contrast, did not have a document that corresponds to the U.S. Bill of Rights during most of its existence, rendering the formal court system less important to struggles over rights. The two nations also differ in where the impetus for rights claims has originated historically. In the United States, the struggle centered on race, while in Canada, it has been over English/French relations. These differences have affected the path each nation has taken to deal with minorities and civil rights, including differential emphasis on individual or group rights and different strategies to seek relief from discrimination.

Relations between local and national levels of government also differ, especially when it comes to immigration. In the United States, legislative action across levels of government is often adversarial, requiring judicial review. The Canadian approach rests more on inter-governmental negotiation and bureaucratic problem solving. Differing norms and strategies for resolving political conflict also affect the tactics of civil society actors. In the United States, both sides of the immigration debate frequently resort to litigation; in Canada, claims making is less centered on rights language and less likely to become a matter for judicial determination.

Such differences play out in the pages of newspapers and on television screens broadcasting the nightly news. In the United States, advocates concerned with immigrant incorporation tend to see the matter in terms of guaranteeing individual rights. Unions have organized cross-country "Immigrant Workers Freedom Rides" to draw links between the plight of contemporary immigrants and that of blacks in the segregated South of the 1950s and 1960s.

In Canada, "civil rights" does not have the same resonance. Instead, immigrant advocates articulate notions of social inclusion and press government to aid immigrants in their efforts to enter the economic marketplace on fair terms. Organizations such as the Ontario Council of Agencies Serving Immigrants criticize the inadequacy of federal funding for immigrant integration and the weakness of legislative guarantees against discrimination, but the word "rights" is not prominent in their calls for action. In short, the two countries differ in the resonance of rights language in public debate, in the use of constitutional review, and in the role of courts generally in influencing civil rights and immigration policy.

To encompass both nations' experiences, we define "civil rights" to include the right of all individuals to expect equality before the courts, liberty of the person, freedom of speech and thought, the right to make

contracts and own property, and freedom from discrimination by government or others in civil society. In the contemporary era, "civil rights" also involve attention to positive measures to ensure socio-economic equality through the labor market and schools, including affirmative action or equity hiring programs. In Canada, this approach sometimes encompasses "social rights"— state-provided benefits against the vagrancies of the market—and can be articulated as a call for social inclusion or social equity. In the United States, "civil rights" is not usually conceptualized broadly enough to include public benefits (Somers and Roberts 2008).[2]

3. Civil Rights Traditions in the United States and Canada

Canada and the United States share an English common-law tradition and commitments to the rule of law and personal freedom. They guarantee many of the same individual rights in their basic law, including liberty, due process, property, freedom of speech and equal opportunity. Anti-discrimination policy figures importantly in both countries. The Migrant Integration Policy Index (MIPEX) finds that the United States and Canada have the strongest anti-discrimination protections for immigrants out of the 31 democratic, highly industrialized nations surveyed (Migrant Integration Policy Index 2010). Many of these protections flow from civil-rights legislation and court cases. In the context of European debates over convergence or divergence, Canada and the U.S. share a similar legal and normative focus on liberal equality guarantees.

The path taken from colonial legal traditions to contemporary civil rights, however, has been very different, and we argue that this carries important repercussions for immigrants. In the United States, the idea of individual rights was enshrined in the Constitution from the country's earliest days as an independent nation and courts were charged with their enforcement against encroachments by every level of government. The Canadian equivalent to the U.S. Bill of Rights, the Charter of Rights and Freedoms is, in comparison, a new document, becoming part of the Canadian constitution in 1982. Before then, a system of parliamentary supremacy meant that legislation could not be challenged through individual rights claims. Advocates sought reform through challenges to the division of power between national and provincial governments and through efforts to change bureaucratic rules "from the inside." The 1982 adoption of the Charter started a "rights revolution" in Canada, bringing the legal strate-

gies available closer to the U.S. system, but significant differences in the articulation and use of courts and rights language remain.

3.1.   The United States: Civil rights as a bloody political achievement

Some U.S. civil-rights guarantees, arising out of English common-law tradition, preceded the War of Independence and helped establish the basis for the U.S. Bill of Rights. [3] The imposition of limits on government power and a broad spectrum of guarantees against government intrusion into individual lives became key distinguishing marks of the new country. The institution of slavery, however, put the lie to the ideal of equal rights for all. Only after a civil war from 1861 to 1865 that killed 650,000 Americans did the 13th, 14th and 15th amendments to the U.S. Constitution inscribe guarantees against discrimination on the basis of race and other factors. These amendments have defined battles over civil rights for racial minorities and immigrants ever since.

After the Reconstruction period following the civil war, many African Americans experienced second-class citizenship despite the constitutional language of equality. State and local law, especially in the South, segregated schools, public places and even drinking fountains. Yet although African Americans suffered egregious violations of constitutionally guaranteed civil rights, those rights, and the ideals they symbolized, provided a powerful basis for collective action. Wartime experiences with racial subordination, on the battlefields of World War II and on the home front, combined with continued segregation in schools and public facilities, gave impetus for a powerful, organized struggle for civil rights in the 1950s and 1960s.

The civil rights movement blended a potent mix of moral suasion directed at legislators and the American public, street-level activism and police violations, as well as constitutional rights litigated in courts. Favorable court decisions helped the movement legitimate its demands and attract supporters (e.g., Kluger [1975] 2004). The movement eventually broadened to include claims of discrimination based on gender, disability, and sexual orientation and to encompass territorially incorporated minorities, such as Chicanos, Asians, and Native Americans.

Congress responded with landmark civil rights legislation. The Civil Rights Act of 1964 extended voting rights and outlawed racial segregation in schools, workplaces, and public accommodations. The 1965 Voting Rights Act requires federal oversight of the standards and procedures used by states to qualify voters and carry out elections. Both laws were strengthened through subsequent amendments, with the federal government acting

under its power to regulate interstate commerce and to guarantee equal protection and voting rights under the 14th and 15th amendments. Congress and state legislatures have also developed other legal protections, bureaucratic institutions, and implementation policies, including affirmative action in contracting, employment and school admissions.

This civil rights saga highlights the significance of judicial review in American politics, which allows courts to overturn legislation, at any level, deemed in conflict with the federal constitution. Such court battles are frequent today around immigrant rights. The history of civil rights also reflects and reinforces the deep resonance that legal rights language has for Americans. Consider, for example, Martin Luther King, Jr.'s famous "I Have a Dream" speech delivered in 1963 on the steps of the Lincoln Monument. King condemned the continued existence of segregation and discrimination in legal terms, describing the Constitution as a "promissory note" to African American citizens that must be redeemed. This same language is resonant in contemporary immigrant rights advocacy.

3.2. Canada: Civil rights through political compromise and the rights revolution

In Canada, one seldom hears the term "civil rights" to refer to demands for equality and inclusion by minority groups. Instead, Canadians speak of equality guarantees, Charter protections, anti-discrimination initiatives and human rights. The difference in the language derives in part from the newness of written rights guarantees, which became part of the Canadian Constitution in 1982 under the Charter of Rights and Freedoms. The Charter established, for the first time, the fundamental nature of certain rights and freedoms, giving residents a means to challenge government in court.

Some protections in the Canadian Charter are of more limited scope than those in the U.S. Bill of Rights. In Canada, rights and freedoms are subject to "reasonable limits," a restriction open to interpretation by courts. Even if a court declares a law unconstitutional, federal and provincial legislatures have the power to override the decision. This power has seldom been exercised, but its inclusion leaves open the possibility that some rights can be circumscribed if government deems it in the public interest. At the same time, the Canadian Charter reflects consensus on the importance of equality of outcome (*rights to*) as compared to the greater American focus on *freedom from*. It also is attentive to group rights and group discrimination, enshrining the legality of affirmative-action programs. Thus, in some respects, the Canadian Charter is more protective of minority rights than the U.S. Constitution.

Canada's enshrinement of group rights and its ambivalence about judicial review to over-ride political decision-making arise from its distinct political history. While the United States' struggle over civil rights grew out of what Gunnar Myrdal termed the "American dilemma" of subordinated black citizens and skin-color prejudice, the conflict in Canada arose out of what Hugh MacLennan labeled the "two solitudes," divided by language, culture and religion. These solitudes, a reference to divisions between French Catholics and English Protestants, date from the 17th century.

Much of the English/French conflict has been worked out through uneasy political compromise rather than litigation. French Canadians used their demographic concentration in Quebec to acquire political power in the province. Those of French origin – increasingly self-identified as Québécois starting in the 1960s – have long understood their rights to be based on an assertion of collective peoplehood rather than individual interest. By the late 1970s, the native and Inuit peoples of Canada were making similar nation-based claims for autonomy and redress. Thus, in Canada, minority claims have been long couched in the language of group rights, rather than individual civil rights, and there is a tradition of trying to find political solutions, rather than judicial resolutions, to thorny problems. These traditions find expression in the Charter, and they affect how immigrants in Canada claim rights.

4.   Immigration Policy and Rights

To understand the intersection of civil rights and immigration, we must understand how rights influence or stand apart from immigration policy. U.S. and Canadian immigration policies shared many similarities up to the 1960s. In the 19th century, governments in both countries influenced immigration through regulation of transportation companies, homesteading requirements, and rules pertaining to major ports and railways, rather than through entry controls (Kelley and Trebilcock 2010; Zolberg 2006). Among the earliest attempts at entry control was legislation to prevent Chinese migration. Race and nationality-based exclusions subsequently became widespread in law and bureaucratic practice, reflecting the belief among many politicians and ordinary citizens that the ideal immigrant should come from Europe, with preference for (Protestant) migrants from North and West Europe.[4] Civil rights were not a consideration.

World War II laid a foundation for change. Military veterans, some of whom had married foreign nationals, pressed for immigration reform, while

many people of all backgrounds rejected Nazism and the racial sciences associated with it. Human rights concepts and institutions took root and grew with the founding of the United Nations, the drafting and adoption of the International Declaration of Human Rights, and the flourishing of civil society groups and international non-governmental organizations. Following the war, the United States and Canada accepted "displaced persons" from Europe, the first step to formal refugee policies, and in 1952 the United States removed racial restrictions on naturalization. We thus find a modest influence of the burgeoning global human rights regime. Neither country, however, made radical changes to immigrant admission policies.

Distaste for racial or national-origin restrictions finally provoked policy change in both countries in the 1960s, but with strikingly different results. The United States chose family reunification as the major goal of admissions policy; Canadian governments promoted permanent immigration as a path to economic growth. Perhaps to facilitate its economic goals, Canada placed greater emphasis on fostering immigrant integration. Canada's approach has provided a base of public consensus that helps advocates push for expanded immigrant rights. The contrast with the United States is sharp. With few formal integration policies beyond a modest refugee resettlement program, the U.S. federal government has essentially left immigrant incorporation to families and ethnic communities, with some limited role for state and local governments. These policy choices have fanned public controversy over immigration.

4.1. United States: Immigration policy as a product and producer of political controversy

U.S. immigration policy has always involved political battles and behind-the-scenes bargaining among members of Congress. It is a process susceptible to interest group pressures and the public's anxieties about foreigners, bringing together, in Aristide Zolberg's (2006) words, "strange bedfellows:" social conservatives can pair up with unions and economic protectionists to oppose migration, while social progressives join with big business to promote it. Immigration thus generates political landmines and internal divisions for both major U.S. political parties, rendering consensus difficult. Long periods of stasis are typical, with occasional bursts of transformative legislative activity (Tichenor 2002).

In the 1950s, pressure for immigration reform came from a diverse coalition of domestic actors and growing sensitivity to the ugly shadow of national-origin restrictions embedded in the Immigration Act of 1924.[5] National-origin restrictions also contradicted the image America sought to

project during the Cold War as a beacon of freedom and democracy. Every year from 1953 through 1965, legislators introduced bills to modify or dismantle the system.[6] Finally, in 1965, a buoyant economy, an overwhelmingly Democratic Congress, the work of presidents Kennedy and Johnson, and the death of staunchly restrictionist Congressman Francis Walter opened a space for reform.

As originally proposed by President John Kennedy in 1963 and introduced again by President Johnson in 1965, the new policy would have allotted fifty percent of all visas to labor migrants, with the remainder for family reunification. However, after the bill made its way through both houses of Congress, family reunification dominated what would be called the Hart-Celler Act. The Act instituted a system that allotted nearly three-quarters of all visas to family members, a practice that continues to the present.

The law also placed, for the first time, numerical limits on migrants from the "Western hemisphere," an area that includes Mexico, with no provision for the long history of Mexican migration and temporary labor in the United States. The result was large-scale unauthorized migration as employers continued to solicit migrant labor while numerical limits restricted family sponsorship. To address this problem, the 1986 Immigration Reform and Control Act gave legal status to roughly three million migrants in exchange for sanctions on employers who hire unauthorized immigrants. Newly regularized residents could sponsor family to the United States, but quota limits created long waiting times and, consequently, renewed pressure to migrate without authorization. Employers continued to hire unauthorized immigrants, while the North American Free Trade Agreement arguably pushed more Mexicans northwards. By 2010, approximately 28 percent of all foreign-born residents living in the United States, over 11 million people, lacked legal residency status (Hoefer, Rytina, and Baker 2011).

This situation has generated significant political controversy. The 1986 law had been sold to the American public partly on the promise that it would prohibit employers from hiring unauthorized immigrants. Yet employers easily evaded the law and the federal government devoted few resources to enforcing it. Ironically, subsequent efforts to "harden" the southern border increased unauthorized migration as people who would have maintained homes in Mexico brought their families and settled permanently in the United States due to the difficulty of crossing (Cornelius 2005). Controversy also spread as unauthorized immigrants, once found mostly in the Southwest, settled across the country.

The *laissez-faire* approach to immigrant integration has also heightened controversy. Consider, for example, English-language instruction for im-

migrants. In 2009, 91 percent of Americans felt it was very or somewhat important that immigrants speak English, but only 30 percent felt that the government should pay for English language classes (German Marshall Fund of the United States 2009).[7] For other day-to-day practicalities—housing, education and the like—state and local governments are pretty much left on their own to manage and finance immigrant settlement.

In part because Congress has repeatedly failed to pass comprehensive immigration reform or provide much federal money for local costs, states and municipalities have reacted with their own legislation, much of it designed to deflect immigrants away from their communities. The result is a patchwork of laws, some of which attempt to restrict unauthorized immigrants from social services, higher education, and rental housing (Bloemraad and de Graauw 2012). Some states encourage local police to work with federal authorities to remove unauthorized immigrants or non-citizens who commit crimes (Provine et al. 2012). Such laws have provoked lawsuits and further politicized discussions around "rights" for immigrants.

4.2.   Canada: Greater consensus over an immigrant nation

In 1947, Canada reaffirmed its commitment to a largely white and British-centric immigration policy. Prime Minster Mackenzie King famously stated that "the people of Canada do not wish...to make a fundamental alteration in the character of our population. ...any considerable Oriental immigration would give rise to social and economic problems" (Kelley and Trebilcock 1998: 312). By the 1960s, however, such racial prejudice was considered illegitimate, although the Canadian public, in the absence of a large non-white minority population, was less engaged with race issues than the United States (Reimers and Troper 1992). In 1962 and 1967, the government announced a set of regulatory changes to eliminate racial or national-origin exclusions.

The turnabout resulted in part from the efforts of churches, provincial human rights organizations, and ethnic lobbies, such as the Negro Citizenship Association. Within government, Canadian foreign service officers felt pressure from Commonwealth nations, notably in the Caribbean, to drop racial discrimination (Triadafilopoulos 2012). At the same time, government bureaucrats and key members of the Cabinet were highly attentive to economic considerations and fearful of an ever-expanding chain of family migration (Hawkins 1988 [1972]). From the government's perspective, immigration policy should primarily serve as an engine to drive forward Canada's economy and enhance population growth.

The regulatory changes of 1967, which were made into law and expanded in the 1976 *Immigration Act*, introduced a "points system" to select immigrants. Like the United States, Canada grants permanent residence based on family sponsorship, economic contribution, or refugee status. Canadian policy differs however, in placing much more emphasis on potential economic contribution when apportioning permanent resident visas.[8] The government argued that such a system privileges merit-based migration, rather than focusing on skin color or origins.[9]

The Canadian parliamentary system and civil service tradition have helped defuse conflict and keep the details of policy negotiations out of the public eye. For much of the 20th century, the Canadian cabinet minister in charge of immigration passed regulations and orders-in-council with limited intervention by Parliament. Even today, those seeking to influence immigration and integration policy must engage both politicians and a professional, technocratic public service that sometimes calls upon outside expert advice.[10]

Whether due to satisfaction with the broad contours of the policy, deference to elite consensus, or insulation from the nuts and bolts of policy development, the Canadian public largely accepts the number and composition of the immigrant stream. In the first decade of the 21st century, Canada admitted 235,000 to 260,000 permanent immigrants each year, a higher proportion in relation to its total population than the United States. Of these immigrants, between 55 and 60 percent are economic migrants and their dependents, while 25 to 30 percent are family migrants, and 10-15 percent are refugees. More Canadians claim satisfaction with the country's immigration policy than residents of other Western nations, and there is no broad social movement or political party opposing mass migration.[11] Indeed, the federal government is increasingly sharing responsibility in selected economic migrants with provincial governments rather than fighting state or local governments in the courts, as in the United States. Public acceptance of the government's approach facilitates a more expansive articulation of immigrants' rights, including concerns about equality of outcomes.

5. Immigration, inclusion, and rights

Immigration policy in the U.S. and Canada has been shaped by domestic politics and prevailing beliefs about economic and foreign policy, with only occasional detours for humanitarian considerations. The rights of immigrants have been, at most, a minor concern. European scholarship

suggests that the likeliest sources of change toward greater attention to immigrant rights come from domestic courts sensitive to a more inclusive vision of rights and international institutions pressing governments for more considerate treatment of immigrants. Some pressure toward convergence may indeed be coming from these sources, but comparison of each country's civil-rights history underscores the primacy of domestic political debate and action by internal advocates, including the growing immigrant population, in shaping policy. A key question is whether each nation's concept of civil rights is expansive enough to include non-citizens.

5.1.   United States: Civil rights for citizens only?

In the United States, the language of civil rights, connected as it is to the ideal of equality, is potent and evocative. But civil rights, as Americans understand the concept, has built-in constraints. One limitation lies in the tendency to link civil rights with a particular legal status: citizenship. The protections of the Bill of Rights are actually more expansive, referring to "persons," not citizens or even legal residents. Even the 14th Amendment, adopted in the wake of the Civil War, requires states to provide equal protection to all *persons* in their jurisdictions. But in the public sphere, equality and rights claims are often, implicitly or explicitly, linked to citizenship. Another important limitation derives from the narrowness of the nation's vision of full citizenship. In the United States, civil rights tend to be conceived as *freedom from* government interference, not *rights to* support from government as a prerequisite to civic inclusion.

What citizenship means in practice has been a source of deep division and struggle in the United States (Smith 1997), with the Civil War as perhaps the most famous example. Race or national origin has regularly trumped citizenship rights in times of national emergency. This was the case for Japanese American citizens interned during World War II out of fears over their potential collaboration with Japan, and for Muslim Americans placed under special surveillance in the wake of the September 11, 2001 terrorist attacks.

Nevertheless, American citizenship has, over time, gained a strong rights-bearing and protective character. The power of citizenship is evident when compared to the more limited rights of non-citizens. For example, in the 1880s, Congress first suspended, and then effectively ended, Chinese migration to the United States, at the same time banning Chinese already settled in the U.S. from citizenship. The Supreme Court upheld these laws in decisions that justified plenary power in Congress and the executive branch as a matter of national sovereignty.[12] Congress has since used its power over

conditions of entry and residence to define categories of membership, each with its own legislative and administrative bundle of rights and duties, including citizen, legal permanent resident, visitor, temporary resident, refugee, asylum seeker, or illegal migrant. Citizenship is the only status that brings the full protections of the Constitution to bear. For non-citizens, courts have given Congress the final authority to determine how much "personhood" an individual enjoys.

Fortunately for immigrants, U.S. citizenship is not hard to obtain, at least for legal residents. A legal permanent resident is eligible after five years and the requirements are not arduous. Once a person goes through the naturalization process, the law draws almost no distinction between native-born and foreign-born citizens.[13] Birth in the United States, even to two non-citizen parents, also provides citizenship, ensuring full legal membership to the entire second generation, including the children of unauthorized residents.[14]

The Janus-faced inclusive/ exclusionary nature of U.S. law is critical to understanding how the United States can be an inclusive immigrant nation in some respects, while being capable of harsh, punitive action in others. An example is the tension between the plenary power doctrine that gives the federal government sweeping power over immigration, and the 14th Amendment that protects "persons" against discrimination on the basis of race, national origin, and other characteristics. The Supreme Court has resolved this tension by forbidding state and local governments to discriminate on the basis of national origin. In a famous 1886 case, *Yick Wo v. Hopkins,* the U.S. Supreme Court overturned a San Francisco ordinance intended to shut down Chinese-operated laundries on 14th Amendment grounds, upholding the right of Chinese non-citizen residents to be free of onerous regulation.[15] Two years later the Court also famously used the 14th Amendment to uphold the U.S. citizenship of US-born children, regardless of their Asian-born parents' ineligibility for naturalization.[16]

When the *federal* government takes action against immigrant residents, however, there are no similar constraints. In 1954, federal immigration personnel worked with state and local police agencies to "sweep" Mexican American neighborhoods and farms, and to stop "Mexican looking" people in a search for unauthorized residents. These operations, with little regard to rights of due process or protection from unreasonable searches and seizures or equal protection of law, led to the apprehension of 130,000 people in California, Arizona and Texas, and the displacement of upward of a million residents (Calavita 1992; Gracía 1980). Tellingly, "Operation Wetback" occurred the same year that civil rights for minority *citizens* took

a significant step forward, first in the U.S. Supreme Court decision *Brown v. Board of Education*, which declared that school districts could not segregate students on the basis of race, and subsequently in *Hernandez v. Texas,* which held that the 14th Amendment applies not just to African Americans, but also to other racially oppressed groups, including Mexican Americans.

Yet the civil rights paradigm does have traction in some cases affecting immigrants. The Civil Rights Act provided a legislative foundation to accommodate minority languages in public education, a policy that directly affected immigrants' children. In *Plyler v. Doe,* a close 1982 decision, the Supreme Court declared that children without legal status have a constitutional right to attend primary and secondary school.[17] Concern over civil rights puts pressure on police departments to avoid racial profiling of residents, regardless of legal status, and unauthorized immigrants have full due process protections and the right to equal treatment when accused of crimes (Decker, et al. 2009). However, when non-citizens are caught up in immigrant detention or removal proceedings—which are outside the criminal justice system—many due process rights, such as access to a lawyer or the right to a bail hearing, are not available.

On balance, the tendency to conceptualize immigrant (foreigner) issues as distinct from civil rights (citizen) issues endures, influencing not just political and legal decisions, but also the attitudes and behaviors of other social actors, from police officers to social service workers. Within some spheres of civil society it is possible to discern a shift toward a more inclusive civil-rights perspective. For example, for years organized labor was hostile to workers without legal status, perceiving them as scabs undermining workers' ability to pressure employers. The civil rights activism of César Chávez and the United Farm Workers largely focused on legal immigrants and U.S. citizens. In 2000, however, the AFL-CIO took a historic *volte-face,* encouraging unions to organize unauthorized immigrant workers and supporting the legalization of settled immigrants without legal status as a matter of civil rights.

The tendency to frame civil rights as protections for citizens, not immigrants (whatever their status), remains entrenched nevertheless. Cuts to social benefits affecting resident immigrants – including legal immigrants – were not generally perceived as a civil-rights issue when Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act in 1996 (Yoo 2008). It is not particularly controversial that legal permanent residents get fewer social benefits than citizens, or that Congress has decreed that non-citizen immigrants, regardless of residency status, can be deported for relatively minor crimes. Unauthorized immigrants who may be members of

American communities in an economic or social sense have limited legal protections. The absence of a robust conception of universal human rights in U.S. law, government, or politics means that rights, for these immigrants, are grist for the political mill.

5.2.   Canada: From few civil rights to human rights for all?

Citizenship has been less of a historical rallying point in struggles by minorities in Canada to gain rights or in the willingness of courts to uphold them. This is partly due to how recently Canadians gained the familiar attributes of citizenship, such as an independent passport. It also lies in a legal tradition that puts less emphasis on citizenship, either as a protection or a source of benefits. A century ago, racial minorities were subject to the same discriminatory treatment regardless of whether they were immigrants or Canadian-born citizens. Ambivalence also arises from the nationhood claims of French-speaking and aboriginal minorities, who view appeals to Canadian citizenship as undermining their claims to self-determination.

As a legal category, Canadian citizenship came into existence on January 1, 1947. Before then, naturalized immigrants and those born in Canada were British subjects. This status provided few protections because Canada operated within the British tradition of parliamentary supremacy, which severely circumscribed the power of courts to declare government action unconstitutional. Asian-origin residents in the 19th and early 20th century, for example, had limited judicial recourse when the government of British Columbia denied them fishing licenses on racial grounds, or when the province refused to grant these residents, including those born in Canada, the right to vote (Roy 1989).[18] It was not until after World War II that Canada lifted race-based voting restrictions.[19]

In Canada, the struggle for equal rights after World War II advanced, not through street demonstrations, but through advocacy by a coalition of civil liberties and human rights groups that used political, administrative and bureaucratic channels to push for anti-discrimination laws and human rights commissions. Canada had signed the Universal Declaration of Human Rights in 1948, and activists used its language to advance their claims. Beginning in 1962, provinces began adopting human rights legislation and in 1977, the federal government passed the Canadian Human Rights Act. These laws offered protections against discriminatory behavior by private employers and fellow citizens, but could not be used by individuals to challenge discrimination in Canadian law.[20] The real rights revolution, in the opinion of many observers, occurred when Canada adopted the Charter of Rights and Freedoms, bringing greater judicial review and more legal

channels to challenge inequalities (Cairns 1995; Ignatieff 2007).[21] This has led to some convergence with the United States by increasing the salience of judicial review and discourses of rights-based claims making.

Perhaps surprisingly, given their prior reticence, Canadian courts have on the whole appeared more willing than their U.S. counterparts to apply Charter protections to everyone on Canadian territory, regardless of legal status. An early landmark upholding the rights of non-citizens was the *Singh* decision.[22] Seven people who entered Canada and claimed refugee status had their claims denied by the Minister of Employment and Immigration and the Immigration Appeal Board.[23] According to the Canadian government, claimants had no legal status in the country and could be returned to their homeland without further appeal. However, the Supreme Court invoked section 7 of the new Charter, which states that everyone has the right to life, liberty and security of the person. The Court determined that "everyone" includes every person physically present in Canada, regardless of legal status. Although subsequent court cases have specified when citizenship or legal status can be used for differential treatment, the *Singh* case enshrined the idea that constitutional guarantees apply to all, an interpretation that is on shakier ground in the United States.

Consensus over the benefits of immigration also provides a basis for a broader public discourse of inclusion. Because immigrants are seen as an economic and demographic asset, it is generally felt that government should help migrants integrate. Initially, government efforts targeted male breadwinners and set narrow goals for labor market participation, as when the 1970s Department of Manpower and Immigration encouraged immigrants to use government employment centers to find jobs and offered language training to those heading for the labor market. Starting in the 1980s, criticism by feminists and racial minorities widened the agenda, extending eligibility for language classes to both genders, regardless of work status, and directing attention to discrimination in the work force. The Employment Equity Act—first passed in 1986 and then amended in 1995—requires employers to take proactive steps to improve the employment opportunities of visible minorities, Aboriginals, women and people with disabilities. These laws are similar to those found in the United States, but the Canadian Charter of Rights and Freedoms explicitly shields such initiatives from "reverse discrimination" claims by majority residents, providing a stronger constitutional shield.

One might expect that the shared problem of discrimination would facilitate coalitions in Canada between immigrants and established minorities, but this has rarely been the case. In the United States such alli-

ances sometimes flourish since the U.S. immigrant rights movement draws strength from the legal precedents, political strategies, popular rhetoric, and even former leaders of the African American and Chicano civil rights movements. In Canada, alliances between immigrants and longstanding minority groups—the Québécois, native peoples and Inuit—are largely non-existent because rights discourses are distinct. The claims made by Québécois and indigenous minorities are about self-determination, control over land, and collective rights as nations within Canada. These goals are seen as separate from, and at times in conflict with, a focus on individual rights and anti-discrimination guarantees. Thus, in 1971, when the federal government announced a new policy of multiculturalism that would celebrate the many cultural heritages of Canadians, some Quebec nationalists perceived a direct attack on their claims to group rights as a nation (e.g., Labelle, Rocher and Rocher 1995). Similarly, while immigrants and their descendants generally accept being labeled as one of many multicultural communities within Canada, Quebecers and natives reject this characterization.

These differences can cause political conflict. In Quebec, for example, there is controversy over Law 101, which, among its provisions, requires all immigrants who send their children to public schools to enroll them in French-language institutions, even if the family would prefer the English-language schools reserved for Quebec's longstanding Anglophone community. Quebecers defend this policy as essential to the vitality of the French language, and point out that immigrants in English Canada face *de facto* limited language choices in the public system. Opponents of Law 101 invoke individual rights to argue that immigrant parents should be able to choose freely among public schooling options. This clash led to one of the few times a government—in this case, the Quebec National Assembly—used the Charter's "notwithstanding" clause to overrule a Supreme Court decision that had declared parts of Law 101 unconstitutional.[24] Canada thus differs from the United States in the degree to which common cause around civil rights serves as a bridge to other groups in society.

Conclusion

In the context of European debates over convergence or divergence around immigration, the US/ Canada comparison reveals some broad convergence, but also significant differences in the details of rights and policies directed to immigrants. Evolving human rights and anti-discrimination norms af-

fected both countries in the 1960s, but the "solutions" to the problem of national origin and race-based exclusions were divergent, with a focus, in entry policy, on family reunification and *laissez-faire* integration in the United States, and on economic growth and modest state-supported incorporation in Canada.

Similarly, in both countries, we see a slow, but noticeable, growth in the capacity of immigrant residents to make civil-rights claims and have them taken seriously, even for those without legal status. But again, the trajectories of prior rights battles shape strategies and outcomes. For example, the U.S. labor movement has drawn parallels between the conditions of undocumented migrants and the status of African Americans in the pre-civil-rights era, and also draws on past tactics that combine street-based protest, legislative action and judicial strategies. In Canada, advocates for immigrants use protest and courts more rarely. The less-entrenched language and practice of individual rights blunt the strategy of court-based litigation, but facilitate political and bureaucratic appeals to social inclusion that move beyond civil rights to encompass social rights. At the same time, the history of minority/ majority conflict in Canada—centered on claims to nationhood by the Québécois and indigenous peoples—provides a shakier foundation for broad coalitions to combat discrimination than in the United States.

In making the case for national distinctiveness in North America, we underscore the extent to which past responses to longstanding minority/ majority conflicts affect the rights immigrants enjoy. The legacy of slavery and the civil rights movement in the United States, and the longstanding question of French Canadian membership in Canada, have powerfully shaped the way rights are understood in each country. These legacies shape claims and what rights are available to immigrants. Our findings thus suggest the value of analyzing conflict and negotiation over longstanding minority/ majority relations for their influence on the treatment of immigrants. Consider, for example, Koopmans and colleagues' (2012) finding that Belgium was an outlier in their analysis of European countries. This might be an outgrowth of the longstanding tension between French and Flemish-speaking Belgians.

Our findings also suggest that the role of courts and law in Europe may have been conceived too narrowly as a source of legal coercion that forces politicians and reluctant populations to be more liberal and expansive on immigrant rights than they might otherwise be. Our analysis shows how the *language* of "rights," particularly in the United States, resonates with broad social, political and even cultural content. Rights language carries

normative legitimacy in the public sphere and frames the way people debate immigration. For those reluctant to extend rights to immigrants, especially unauthorized residents, a counter-narrative of citizenship restricts rights by legal status in the US. The US-Canada comparison also reveals tensions in rights appeals, notably around group versus individual rights. Our comparative analysis thus invites European scholars to think more capaciously about the language of rights and to be alert to alternative normative claims.

Notes

1. Cornelius, Philip and Hollifield (1994) were among the first to ask this question in a comparative framework. Its continued relevance is evident in the forthcoming third edition of their volume.

2. Various European nations provide robust social rights to migrants; some even allow non-citizens to vote in local elections, which neither the United States nor Canada does. This might suggest that Europe has embraced a stronger human-rights framework for immigrants than Canada or the United States. Yet cross-national policy comparisons indicate that many European countries lag behind their North American counterparts in ensuring basic civil-rights protections, especially against discrimination (MIPEX 2010). While recent European Union policies, such as the EU Race Directive, are forcing member nations to make changes, the pace is slow and sometimes reluctant, with uncertain outcomes (Joppke 2007). Future research needs to examine these distinct constellations of rights.

3. The Bill of Rights, which refers to the first ten amendments to the U.S. Constitution, came into effect in 1791.

4. In both countries, Italian, Russian and Jewish immigrants were tolerated as only slightly better than non-Europeans, and as substantially inferior to West Europeans. For historic overviews of immigration policy, see Zolberg (2006) on the United States and Kelley and Trebilcock (2010) on Canada.

5. This law, also known as the Johnson-Reed Act, restricted migration from South and East Europe, and prohibited almost all Asian migration.

6. For more on this period, see Wolgin and Bloemraad (2010).

7. This compared to 48 percent of Canadian respondents who supported government funding.

8. Potential economic migrants accrue points for being of working age, having certain skills, and possessing advanced education. A much smaller group of business investors gain entry by making a significant financial investment in the Canadian economy.

9. While replacing race criteria with economic ones could be framed as a move to a merit-based system, critics note that if "merits" are defined as education and professional qualifications, then most people from developing countries will be shut out.

10. This is also the model for Canada's asylum policy, which is notable for its centralized administrative operations, in contrast to the more adversarial, legalistic American system or the fractured, politicized Australian one (Hamlin 2012).

11. Only 25 percent of Canadians surveyed in 2009 said that immigration is more of a problem than an opportunity, compared to 54 percent of Americans who viewed it as a problem (German Marshall Fund of the United States 2009). Opinion in Europe ranged from 43 percent of French who saw immigration as a problem to 66 percent in the United Kingdom.

12. Today, some commentators see less willingness by courts to uphold the plenary power doctrine that grants Congress ultimate authority over entry and deportation. Others, however, note that since 2001, the federal government has challenged non-citizens' rights to the most basic guarantees (such as habeas corpus) based on executive authority in matters of national security.

13. The one exception is the constitutional requirement that the President and Vice-President of the United States be "natural born" citizens. Canada makes no such distinctions; foreign-born individuals have served as prime minister of the country.

14. Like the United States, Canada gives birthright citizenship to all those born on Canadian soil. Canada and the United States are among few countries in the world with such inclusive *jus soli* provisions (Vink and de Groot 2010).

15. *Yick Wo v. Hopkins*, 118 U.S. 356 (1886). Western states did pass laws barring those ineligible for naturalization from certain licenses and owning property. Since only Asians were ineligible for naturalization, these were effectively anti-Asian laws.

16. *United States v. Wong Kim Ark* (1898).

17. 457 U.S. 202 (1982). The court struck down a 1975 Texas statute that withheld state funds for educating children who had not been legally admitted to the United States and authorized local schools to deny them admission.

18. Although minorities in Canada had more limited judicial recourse when they suffered the prejudices of mass democracy, discrimination in the United States also occurred despite judicial review. Following the attack on Pearl Harbor, both countries required persons of Japanese ancestry—including citizens—to leave their homes for internment camps or relocate far from the West Coast. War exigencies and fears have repeatedly led to civil rights violations in Canada and the United States, a pattern apparent in the contemporary responses to terrorism.

19. Chinese- and Indo-Canadians gained the right to vote in 1947. Japanese-Canadians were given suffrage in federal elections in 1948 and in British Columbia elections in 1949.

20. The Canadian Bill of Rights, enacted in 1960, sought to offer some protections, but it was a weak, declaratory document, with no inherent superiority over ordinary government legislation.

21. The Supreme Court of Canada heard only 34 cases concerning the provisions of the Bill of Rights, with a 15% success rate for claimants, over the Bill's existence (Knopff and Morton 1992). In contrast, within seven years of the Charter's enactment, the Supreme Court had heard one hundred Charter cases, of which 35% were successful (Morton, Russell and Withey 1992).

22. *Singh v. Minister of Employment and Immigration*, [1985] 1 S.C.R. 177.

23. The U.S. government makes a distinction between refugees who make a claim for protection overseas and asylum seekers who make claims on U.S. territory. Canadian law does not make this distinction, thus in-land claimants are also called "refugee" claimants.

24. The case that spurred the use of the notwithstanding clause was *Ford v. Quebec* [1988] 2 S.C.R. 712 which focused on Law 101's language provisions for commercial signs. Political controversy over immigration, cultural accommodation and religious freedoms has also erupted over issues such as the use of religious law to resolve family disputes or women's right to wear head or face coverings in provinces such as Ontario and Quebec.

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About the authors

Irene Bloemraad, Sociology, University of California, Berkeley, Berkeley, CA 94720-1980. Corresponding author.
E-mail: bloemr@berkeley.edu.

Doris Marie Provine, Justice and Social Inquiry, School of Social Transformation, Arizona State University, Tempe, AZ 85827-6403.
E-mail: marie.provine@asu.edu.

Migration, Development, Gender and the 'Black Box' of Remittances: Comparative Findings from Albania and Ecuador

Russell King, Diana Mata-Codesal & Julie Vullnetari

Abstract

Set within the growing literature on migration and development, this paper has two interlinked objectives. First, it examines remittances, a key element of the migration-development nexus, from a gendered perspective. Second it does so in a comparative empirical perspective, focusing on remittance behaviour in two contrasting settings, Albania and Ecuador. Both countries have experienced mass emigration in recent decades. Research is based on household surveys and in-depth interviews with remittance receivers in selected rural areas of both countries, supplemented by in-depth interviews with both senders and receivers of remittances. By using the concept of 'remittance dyads' – person-to-person transfers of money and gifts – we examine the gendered mechanics of conveying and managing remittances to see if they have the potential to reshape gender relations in these migrant households. They do, but the effects are limited.

Keywords: migration, development, remittances, gender, Albania, Ecuador

1.   Introduction

There has been a surge of interest over the past decade in the relationship between migration and development. The defining contribution which kick-started this trend was Van Hear and Sørensen's (2003) *The Migration-Development Nexus*, wherein remittances were highlighted as the key contribution that migration could make to the improvement in well-being of people in migrant source countries. Indeed, remittances

came to be regarded as a kind of 'development mantra' (Kapur 2004); a self-help mechanism which targets those households and families which need financial support the most and which are thereby rewarded for the sacrifice of sending one or more family members abroad to work, often in very difficult conditions. Towards the end of the decade a somewhat more critical perspective emerged. This challenged the 'mantra' by drawing attention to remittances' problematic relationship with social inequality, and to the need to open up the 'black box' of remittances to expose and critically analyse the individual-scale dynamics and power relationships involved (Carling 2008a; de Haas 2007a; Kunz 2008).

Our paper furthers this critical perspective by developing two inter-linked lines of analysis. First, we pay particular attention to the way that remittance transfers are *gendered processes:* remitting patterns are both shaped by gendered social and kinship structures and have the potential to reshape gender relations, for instance through the involvement of women in sending, receiving and administering remittances. Whether this potential is realised is another matter. Second, the paper compares two migration-remittance systems in contrasting regions of the world: *Ecuador-USA* and *Albania-Greece*. This choice for comparison is not casual, since both sending countries experienced sudden mass emigrations triggered by economic and political shocks in the 1990s: in Albania the chaotic exit from communism and then economic collapse and civil unrest in 1997; in Ecuador political instability, crippling structural adjustment measures, followed by 'dollarization' in 2000. Based on empirical surveys (questionnaires to remittance-receiving households and interviews with remittance senders and receivers), we unpack the family and household dynamics of remittance transfers through an in-depth study of person-to-person 'remittance dyads'.

The paper is organised as follows. In the next section we review the shifting theoretical interpretations of the relationship between migration and development, paying particular attention to the key role that remittances play in these understandings, and to the need to apply a gendered analysis. Next come two contextual sections: the geographical and migratory settings of Albania and Ecuador; and an outline of the survey methods used to collect primary data. In the 'results' sections of the paper we examine the dyadic patterns of remittances from New York to Ecuador and from Greece to Albania. We explain how these reflect the male-led character of the two migration systems, and we evaluate the extent to which evolving remittance dynamics have the potential to re-texture gender relations. In the two case-studies under review we find that changes in gender relations are rather modest.

2.   Migration and development

Although the historic role of migration in the development of *receiving* countries has long been acknowledged (Piore 1979; Potts 1990; Thomas 1954), interest in migration's impact on *sending* countries is much more recent. It is this latter relationship that concerns us here. The apparent neutrality of the now-fashionable phrase 'migration-development nexus' hides multiple questions about definition and the nature and directionality of causal relationships. According to Raghuram (2009) the 'edifice' of the migration-development discourse needs to be 'unsettled'. She asks: 'which migration, what development?' In answer to the first question, we look at labour migration from relatively poor to richer countries – in global 'compass' migration terms, from South to North, and East to West.

The 'what development?' question is more difficult to answer. Beyond the world of neoclassical economics where development equates growth in national income, most social scientists subscribe to a much broader definition which includes cognisance and measurement of poverty, health, education, inequality and human capital. We would also factor gender equality into this mix. Recognising the multidimensional nature of development has been fundamental in the work of the United Nations Development Programme in compiling the *human development index*. Successive UNDP reports follow a 'capabilities' approach to conceptualising development which emphasises freedom of choice and the ability to achieve vital 'beings and doings' (UNDP 2009: 14, 208).

Two further questions are key. First, does migration cause development, or is it the other way round? Second, should not the causality question be posed in terms of migration and *under*development?

Few would dispute that, in a low-income country, emigration can be a rational response to poverty and limited life opportunities. The question is, what happens next? One of the myths of migration is the so-called 'root causes' approach which states that, if migration results from underdevelopment, then by removing the condition of underdevelopment, migration will cease. Quite apart from the fact that this stance 'carries the unspoken message that migration is a *bad thing that ought to be stopped*' (Castles 2009: 442, his emphasis), the reality is that the increased economic resources and improved communications that development brings actually make it easier for *more* people to migrate to better opportunities abroad (de Haas 2007b).

This is only the beginning of the 'what happens next?' question. The real conundrum comes with the impact of migration on the future development of the sending country or region. Put simply, does migration lead to

development? And if so, does this development feed further migration, as postulated above? Or does migration act to further reproduce the condition of underdevelopment? And if so, does continuing underdevelopment lead to continuing migration? In other words, does the migration-development nexus take the form of a virtuous cycle, or a vicious one?

2.1.   Optimism, pessimism, and pendulum swings

As Hein de Haas has recently argued (2010, 2012; see also Faist and Fauser 2011), the debate between these two opposing interpretations has swung like a pendulum, from optimism in the 1950s and 1960s to pessimism in the 1970s and 1980s, and back again to optimism in the 1990s and 2000s. Now, we detect the start of a new swing towards pessimism.

The industrial expansion of Western Europe and North America in the early postwar decades was sustained by large-scale worker migration from Southern Europe, Latin America, and elsewhere. Neoclassical economics 'explained' this mass transfer as a spatial reallocation from labour-rich to labour-poor countries, spurred by the market incentive of much higher wages. Under this model, migration continues until there is factor-price equalisation, at which point migration stops because wage discrepancies are no greater than the cost of migration. Also in the 'pure' neoclassical model, there are no remittances and no return migration, since migrants are viewed as having moved for good as part of the adjustment to spatial equilibrium of labour. However, in many European countries, migrants were treated as 'guest-workers' who *would* eventually return home. Part of this migration management regime was the 'developmentalist' assumption that migrants would take back savings, training, new ideas and entrepreneurialism; all of which would stimulate development in their home countries. For the most part, these were pious hopes. Detailed studies of Turkey, the country which had supplied the largest number of migrant workers to Europe, questioned both the scale and nature of the 'emigration of surplus labour and return of innovation' model (Abadan-Unat et al. 1974; Paine 1974). The swing to pessimism had begun.

Incorporating late-1960s' thinking from the Latin American 'dependency school' (Frank 1969) as well as Third-Worldist concerns over brain drain from Africa and Asia (Bhaghwati 1976), growing pessimism over the economic and moral value of migration reflected Marxist theories of capitalism's exploitation of (migrant) workers. Applying the dependency model to Europe, Seers (1979) argued that periphery-to-core migration was the syndrome of the Frankian notion of the 'development of underdevelopment' rather than a stimulus to development in migrant-origin countries. Remittances – hardly

noticed in the neoclassic model – were acknowledged but they were not seen as a productive input into the development process. Rather, it was alleged, they were 'frittered away' on conspicuous consumption, used to build unnecessarily luxurious housing, or spent on other 'non-productive' outlets such as small shops in migrants' home villages (Lipton 1980; Rhoades 1978). According to Castles and Kosack, in a book which captured the theoretical *zeitgeist* of the time, 'labour migration is a form of development aid given by the poor countries to the rich ones' (1973: 8).

Around 1990, the pendulum swung again, back to what de Haas (2012: 19) calls 'neo-optimism'. Drawing partly on de Haas (2010, 2012) and Faist and Fauser (2011), we posit four main reasons for this. First, the 1980s and 1990s saw a body of empirical research which suggested that, in certain circumstances, migration *could* stimulate home-country development. In other words, alongside negative 'backwash' effects (depopulation, brain drain, inflation etc.) were also 'trickle-down' effects whereby remittances and migrants' investments gave a multiplier boost to the local economy.

Second, the neo-liberal, individualist ethos of the 1990s and 2000s placed migrants centre-stage as development actors, in contrast to the neoclassical and neo-Marxist ideologies which viewed migrants either as atoms responding to market forces or as victim-pawns of the exploitative capitalist system. Alongside the celebration of the migrant as the 'hero' of development comes an emphasis on *remittances*: not only financial remittances but also backflows of knowledge, ideas and new behaviours – what Peggy Levitt (1998) called 'social remittances'.

Third, migration-development neo-optimism was underpinned by the 'new economics of labour migration' (see Lucas and Stark 1985; Stark 1991; Stark and Bloom 1985). Although NELM drew on some aspects of the neoclassical model, it incorporated two fundamental differences from the earlier way of thinking. First, it aggregated migration decision-making and economic behaviour to the 'meso-scale' of the family and community; and second it combined income maximisation with risk aversion. In this way, migration and remittances were seen as a hedge against the failure of other elements of household income, such as a crop wipe-out. In short, NELM reconceptualised migration as a household livelihood strategy, with remittances as the central plank.

The final paradigm shift which gave theoretical purchase to the new optimism was the transnationalist view of migration introduced by Glick Schiller et al. (1995). This, too, was a migrant-centred model, which saw migrants as agents of their own development, and that of their home communities. The 'transnational turn' recognised the increased possibilities

of migrants and their families to live more or less simultaneously in two (or more) places, thanks to improved techniques and lowered costs of international travel and communication. Remittances are seen as the key element of the economics of transnational living (Guarnizo 2003).

Especially over the past decade, the 'virtuous' interpretation of the migration-development cycle has dominated international discourse, including the Global Forum for Migration and Development, the World Bank, UNDP, and the UK's Department for International Development (Piper 2009). The consensus view is that migration can be a 'route out of poverty' for many and a pathway to prosperity for some; therefore, echoing the title of the 2009 UNDP *Human Development Report*, the barriers to mobility need to be overcome. Richard Black, director of a major DfID-funded programme of research on migration and poverty at the University of Sussex, argues that migration should be considered an international 'public good' because of its potential to alleviate poverty and stimulate development (2011).

More sceptical views emerged at the turn of the decade. Delgado Wise and Márquez Covarrubias (2011) restated the neo-Marxist critique, basing their arguments on their interpretation of the 'asymmetric and subordinated' Mexico-US migratory system, with migrant workers incorporated into the lowest and most exploited segments of the highly polarised US labour market. Meanwhile Skeldon (2008) warned of the danger of expecting too much from migrants' capability to effect real development, and asked whether it is morally justified to impose on migrants a 'duty' to stimulate home-country development when their lives – thanks partly to the global regime of migration control which forces them into irregularity – are blighted by low wages, precariousness, deskilling and racism (Bakewell 2007). Hence, 'we may be at a new turning-point... heading towards a neo-pessimistic backswing of the migration and development pendulum' (de Haas 2012: 22).

2.2. Opening up and gendering the 'black box' of remittances

Throughout the above debate on the shifting terrain of the migration-development relationship, remittances have held a fluctuating and often vicarious position, coming increasingly to the fore in the neo-optimism phase which still characterises present-day policy. Economists and development planners have latched on to remittances as a financial flow to developing and transition countries which has to be maximised, and prudently invested, without paying much attention to their ontology and phenomenology. What does the sending and receiving of remittances mean to the individual actors involved? Who, exactly, sends; and who receives? How do they define what 'counts' as remittances and what does not? In

short, we see remittances as a 'black box' that needs to be opened up and peered into in order to understand what is really going on.

Building on the now-well-established transnational paradigm, we conceptualise remittances as *transnational gendered social practice* which reflects the gender structures of both the societies of migrant origin and destination, as well as the gender relations which are embedded in the migration and remittances processes themselves. Unpacking the gendered social practice of remittances, we observe a variety of 'remittance dyads' (Carling 2007). The remittance dyad is an individual sender-to-receiver pairing, but variety is introduced by the distinction between primary and secondary dyads. A male migrant could have as his main dyadic partner his wife in the home village, but might also remit smaller amounts to his parents, his secondary dyad, perhaps privileging his father as the recipient. Thus we begin to see the relevance of a gendered analysis of remittances, which is as yet underdeveloped.

The existing literature on gender and remittances falls into two camps. First there are papers which treat gender purely as a dichotomous variable in looking at whether men or women are the more reliable remitters, and who remits more. Reviewing this literature, Carling (2008b: 588) finds it inconclusive. It often seems that men are more likely to remit, and to remit larger amounts, but women may remit a larger proportion of their (generally lower) wages than men. Another common view is that women, because of their stronger family orientation and nurturing nature, are more 'sensible' receivers and managers of remittances than men; women direct remittances to family welfare, health and education, men towards land, housing, vehicles, and gadgets (Rahman and Fee 2009). However, there is little systematic evidence, let alone statistical proof, to support these generalisations.

The second strand of literature challenges the 'Are men or women better remitters?' discourse and tries to unravel the gender relations behind the entire migration-remittances cycle (King and Vullnetari 2010). A landmark in this more integrated approach was the programme of research launched in the latter half of the 2000s on 'Gender, Remittances and Development' by the United Nations International Research and Training Institute for the Advancement of Women (UN-INSRAW). In their working paper which acted as the ideological and literature-survey platform for the UN-INSTRAW research, Ramírez et al. (2005) make two key points:

– Gender is a cross-cutting element throughout all stages of the migration process. It not only influences physical movement across national

borders, but gender relations are themselves negotiated and either reconfirmed or reconfigured within transnational migratory contexts.

– Remittances are more than just periodic financial transfers: they are the result of complex processes of negotiation within households that are immersed in intricate networks of relations between the diaspora and the countries of origin. Above all, decisions about how remittances are spent, who benefits, and longer-term effects on family welfare and structure, are not gender-neutral.

– These orientational statements prompt further consideration. We can deepen the theoretical analysis by placing it with the 'gendered geographies of power' framework of Mahler and Pessar (2001). The three key components of this conceptual model are, firstly, the notion of *power geometries*. As Doreen Massey points out (1994: 149), flows of people, goods, money and images in our highly globalised but unequal world are subject to different constellations of power. Secondly, *social location* refers to individuals' position within power hierarchies, which include social-class and kinship structures. Thirdly, *geographic scale* captures the way in which gender-power relations operate across multiple levels, from the (female) body which in various ways is controlled or excluded, to the meso-scale domains of family and community, to the national and international scales.

– We now move to the empirical part of our paper in which we attempt to answer questions relating to the foregoing conceptual outline at two levels. First, in relation to our scoping of the migration-development nexus, do the cases of Albania and Ecuador broadly fit the virtuous or the vicious cycle view of the nexus? Second, focusing more specifically on remittances and their link to the migration-development debate, how are these financial and allied transfers gendered in our two case-studies? This, in turn, breaks down into two recursive questions:

– What are the gender and family structures that shape migration and remittance behaviour?

– How does the sending and receiving of remittances reshape gender relations in migrant communities and sending areas?

3.   The Settings: Albania and Greece, Ecuador and the United States

The research is based on two international migrations: one short-distance, linking adjacent countries in the Balkans, the other a globe-spanning South to

North 'hemispheric' migration. The Albania-Greece study was carried out by King and Vullnetari as part of the aforementioned UN-INSTRAW programme of research (see Vullnetari and King 2011; also King et al. 2011). The Ecuador-US study is drawn from Mata-Codesal's doctoral thesis (Mata-Codesal 2011).

Table 1 sets out some comparative statistics on the two migrant-origin countries. Several figures are strikingly similar: human development, life expectancy, GNI per capita, recent GDP growth, stock of emigrants, and the share of emigrants who are tertiary-educated. Others are different: the relative scale of emigration is much greater for Albania, likewise the weight of remittances per head of the country-of-origin population. The average remittance sent per emigrant is higher for Ecuador, a fact that reflects the greater income divide between Ecuador and the US on the one hand, and Albania and Greece on the other.

Table 1. Albania and Ecuador: population, development, migration and remittance statistics.

	Albania	Ecuador
Population, 2009 (millions)	3.2	13.6
GNI per capita 2009 (Atlas method, US $)	3,950	3,920
GDP annual average growth, 2005-09 (%)	5.0	4.3
Human Development Index (2007)	0.818	0.806
Life expectancy at birth (2007)	76.9	75.0
Stock of emigrants, 2010 ('000)	1,438	1,148
Emigrants as share of resident population (%)	45.4	8.3
Main destination countries	Greece, Italy	USA, Spain
Emigration of tertiary-educated (% of total emigration)	9.0	9.5
Remittances, 2009 (US $ millions)	1,317	2,502
Average remittance per head of resident population (US $)	412	184
Average remittance per migrant (US $)	916	2,179

Source: UNDP (2009: 168, 172); World Bank (2011: 54, 108).

Albanian emigration started in the 1991, following 45 years of harsh communist rule during which emigration was banned. Whilst part of the eagerness to migrate was the natural curiosity of people to see a world that had been denied them, the most important push factor was the dire economic situation produced by the chaotic transition to 'democracy' and a free-market economy, which left many people without jobs or other means of support. By 2010, 1.4 million Albanians were abroad, most of them in Greece (600,000) and Italy (400,000).

Throughout the early years of emigration, most of the movement was irregular, since Albanians had few legal opportunities to enter and legally

work in Greece, or elsewhere. Entry to Greece was on foot, using paths which crossed the mountainous border, dodging the Greek border police. Given the nature of these treks as arduous and dangerous, as well as the patriarchal nature of Albanian families which limited the independent mobility of women, most of the emigrants in the 1990s were men.

A major change in the structural position of Albanians in Greek society occurred in 1998 when a regularisation scheme was launched: more than 200,000 Albanians legalised their presence in Greece. Further regularisations took place in the 2000s. These measures allowed Albanians to improve their access to the labour market and protect themselves from the kinds of exploitation that 'illegal' immigrants are vulnerable to. Regularisation also gave them the basis to bring over their wives and families, or to start a family in Greece. This combined legal, economic and family-structure transition is crucial for understanding differentiated patterns of remittance dyads. Men have continued their initial occupational specialisations in the farm-labour and building sectors but have been able to access (at least up to the recent severe recession in Greece) more secure work, including setting up their own small businesses in fields such as construction, removals, house repairs etc. Women work mainly as domestic cleaners or as carers of small children and elderly people (Hatziprokopiou 2003).

Emigration from Ecuador to the US dates to the 1950s, but accelerated during the 1990s due to economic stress produced by structural adjustment measures (Pribilsky 2007). Towards the end of that decade the economy collapsed and in 2000, in a desperate measure to curb hyperinflation, the US dollar replaced the Ecuadorian sucre as the country's currency. This monetary switch proved socially regressive, ruining the already-precarious financial situation of the poor and less well-off. The political situation was equally unstable, with ten different governments during 1996-2007. Faced with this dire economic and political situation, many Ecuadorian men emigrated in order to earn remittances to support their families. Even though the US became progressively more expensive and risky compared to European destinations (notably Spain), Ecuadorians continued to head for New York since the monetary rewards are perceived to be higher there.[1]

Recent estimates give figures of approximately 500,000 Ecuadorians living in the US, and 400,000 in Spain (Gratton 2007). Emigration to New York is male-dominated and irregular: most men work in construction or in other manual occupations where employers ask no questions about legal status. Emigration to Spain is female-dominated and has fewer obstacles: most entered as visa-free tourists and overstayed, subsequently taking advantage of Spain's periodic regularisations.[2]

4.   Research design and methods

Within the two bi-national contexts, field research was articulated along localised 'migration-remittance corridors'. Three contiguous villages in the municipality of Burim (a pseudonym) in southern Albania were chosen to represent the migration trends and ethno-religious characteristics of south-central Albania (Muslim majority, with some Orthodox Christians and socially marginalised Roma). The villages have a combined population of around 7000 and are located at some distance from Korçë, the most important administrative and economic centre in this part of Albania. Burim lies at an altitude of 800 metres within an elevated plain with favourable soils for farming. Summers are hot and dry, winters wet and cool with occasional snowfalls. Mixed agriculture is practised – cereals, vegetables and fruit (apples are a local specialism), plus pigs, cattle, sheep and poultry. Although there are some signs of a remittance-led revival, agriculture has languished into semi-subsistency due to the break-up of the communist-era cooperatives into smallholdings and the abandonment of infrastructures, as well as the effects of emigration itself. An estimated 80 per cent of emigration from Burim is to Greece, most of it to Thessaloniki, the second city of Greece, more accessible than Athens.

Xarbán, the Ecuadorian field location (also a pseudonym), has a population of just over 2000; it is in the southern province of Azuay, whose capital Cuenca is about an hour and a half away by bus. Xarbán is positioned on the lower slope of a large valley system. The lowest land, at around 2500 metres, is given over to agriculture (corn, potatoes, tomatoes, beans, fruits); the middle-range land is cattle pasture; the highest land, above 3500 m, is unusable. The climate is high-altitude tropical, with abundant rain but also a dry season. Mounting population pressure on hilly and erodible land has progressively split up ownership into *minifundios* (less than 5 hectares) and *microfundios* (< 1 ha). Whilst agriculture provides the basis for survival, it allows for little improvement in living standards or life ambitions (Carpio Benalcázar 1992: 46). Migration, initially internal (to the coastal sugar estates and the Amazon basin) and then international, to the US, became the favoured way to progress. Emigration became large-scale during the 1990s and 2000s following a destructive landslide in 1993 and the economic problems referred to earlier. As with Albanian migration to Greece, the recession years since 2008 have had a dampening effect on emigration. The much smaller number of female immigrants in New York are involved in raising families and working part-time as domestic cleaners and baby-sitters. Given the cost of migration, on average $15,000 per head,

most migrants can only start to rend remittances after a year or two, once their debt is paid off.

Both projects comprised two main field instruments: a village-based household survey to remittance receivers; and follow-up interviews to some remittance receivers, and to remittance senders in New York and Thessaloniki. Although the sample sizes of the questionnaire surveys differed (350 households in Burim, 76 in Xarbán), the sample fraction of the village populations was roughly equal at around 15 per cent.[3] Whilst the two investigations were independent, the survey schedule contained many questions on remittances which were identical or closely similar – notably those relating to dyads, amounts sent, frequency and means of transfer, management of remittance spending, and the uses to which remittances were put. Both surveys were administered via a process of random and snowball sampling. We are confident that, whilst statistically 'true' representativeness cannot be guaranteed, there is a good correspondence between the samples taken and the wider population of village households with migrants abroad.

In both Burim and Xarbán, 25 in-depth interviews were carried out in the respective communities with remittance receivers, local key informants and returnees. A further 20 interviews were taken with remittance senders in Thessaloniki, and 10 in New York. Where possible, interviews were recorded and transcribed; otherwise extensive notes were taken. The formal research instruments were supplemented by ethnographic observations in all research sites.

A final note on timing. The fieldwork was carried out between late 2007 and early 2009; hence before or during the early months of the global recession, which for that reason does not feature much in our discussion.

5.   Sending and receiving remittances

We start with background data from the household surveys (Tables 2 and 3). For remittance amounts, comparability is slightly compromised by the different currencies used. However the mean amounts per year – €2600 for Burim and $3430 for Xarbán – are remarkably similar given the higher value of the euro. What differs is the distribution of amounts, with Burim remittances more tightly bunched around the modal class of €1000-2000. For Xarbán, a greater share of households receives either lower or larger amounts. These differences mainly reflect the wage limitations of the labour market for immigrants in Greece. The New York economy offers greater

earning opportunities, but not for all immigrants, and some may still be paying off debts to smugglers.

Table 2.   Burim and Xarbán: annual remittances per household.

	Burim (euros)		Xarbán (dollars)	
	no.	%	no.	%
< 1000	66	18.9	23	30.3
1000-2000	139	39.7	8	10.5
2000-4000	76	21.7	23	30.3
4000-6000	44	12.6	10	13.1
> 6000	25	7.1	12	15.8
N households	350	100.0	76	100.0

Source: Authors' surveys.

Table 3 shows that remitting frequency is much higher in Xarbán, where 60 per cent of remittances are sent at least monthly, compared to only 9 per cent in Burim, where most remittances are sent two to four times per year. This contrast is directly linked to the preferred method of transfer. Most remittances to Xarbán are sent electronically via money transfer operators (MTOs) or via other formal channels, whereas Burim's closeness to Greece means that the vast majority of remittances are 'hand-carried' when migrants return for visits, or sent via relatives or trusted co-villagers who are travelling.

Table 3.   Burim and Xarbán: remitting frequencies by remitters to households.

	Burim		Xarbán	
	no.	%	no.	%
Weekly or fortnightly	3	0.9	25	15.8
Monthly	27	7.7	69	43.7
Every two months	31	8.9	1	0.6
Every three to six months	194	55.4	43	27.2
Once a year	58	16.6	7	4.4
Irregular/as needed	37	10.6	13	8.2
N remitters	350	100.0	158	100.0

Source: Author's surveys.

Note: Whereas for Burim (N=350) only the remitting frequency of the main remitter is recorded; for Xarbán it was all remitters to the households (hence N=158).

5.1. Remittance dyads and gender-power relations

Tables 4 and 5 set out the main remittance dyads for Xarbán and Burim respectively. The listing of the dyads is in their order of frequency as reported in the survey, interview and key-informant data. Kinship, gender and generation are the main structuring variables for these dyads, but issues of power, particularly patriarchal power, are the real 'drivers' behind the relationships mapped out. What is also interesting – and this one is of our main research questions – is how the transnationalisation of these kinship links through migration and the experience of sending and receiving remittances acts to modify, or even reinforce, these gendered power-geometries.

Both the Albanian and Ecuadorian societies can be regarded as patriarchal; however we perceive Albanian rural society as more deeply structured along patriarchal lies than the Ecuadorian one. Ecuadorian village society reflects the kind of patriarchal and matriarchal values sanctioned by the Catholic Church: a system of fairly traditional gender roles but with women retaining some agency within the maternal and caring spheres and engaging in farm labour as childrearing and other responsibilities allow. The nuclear family predominates, although kinship links remain strong (Kyle 2000; Pribilsky 2007; Weismantel 1998).

Albanian rural society conforms to many of these same gendered values, but there are essential differences. Religion, outlawed by the communist regime which declared Albania 'an atheist state', plays a minor role although people are aware of their Muslim, Orthodox or mixed heritage. What distinguishes the Albanian case is the more hierarchically ordered gender and generational structures, in particular the 'ownership' of the daughter by her father, and the way in which this 'possession' is passed to her husband and his paternal family upon marriage (de Waal 2005; Saltmarshe 2001). These gender-power relationships, 'legitimised' by Albanian customary law and by no means eradicated by the communist regime's commitment to gender-equality, are more firmly entrenched in the north of Albania; less so in the south, where Burim is located. Our data from southern Albania show some departures from this normative patriarchal framework, as we shall see. However we start with Xarbán as the patterns here are more straightforward.

5.2. Xarbán and New York

From Xarbán emigration started as a male-led phenomenon and has remained so, due to the continued 'illegal' status of the migrants in the US, which makes family settlement very difficult. This, rather than patriarchal principles *per se*, has determined that remittance-senders are mainly males

living abroad as single men, whether they are married or not. For Xarbán, by far the most common dyad comprises married men who remit to their wives (Table 4). When married migrants are still childless, the 'left-behind' wife feels more vulnerable:

If the money ever stops arriving and I am used to living a comfortable life, that's bad. Suddenly something goes wrong with my husband... then I am fucked

(Gabriela, age 45, no children).

All respondents (senders and receivers alike) agree that the obligation to send remittances becomes stronger once children are born, especially if there is at least one son:

Once I had my kids my life improved. Before that, he sent $20 a month to me; he didn't care whether I had shoes on my feet or not. Now he sends $400 a month. Because of the children. He must send [money to support them]

(Berta, 30, two daughters and one son).

In the minority of cases where the migrant unit is the married couple, other dyads are formed. In these cases, often the children remain in Xarbán, but the form of the dyad depends on the age of the children (Table 4). If the latter are old enough to live independently, they are remittance recipients, usually father to son. If they are younger, they live with relatives, usually with their maternal grandmother, or as a second option with a maternal aunt. Note how, with these latter dyads, female kinship patterns prevail over male ones – in contrast with the Albanian case. Also in Albania, it is rare to find the parent-offspring dyad.

Table 4.   Main remittance dyads, Xarbán.

Sender (New York)		Receiver (Xarbán)
Married male migrant alone abroad	→	Wife (and children)
Married couple abroad	→	Maternal female relatives (caring for migrants' children)
Married couple abroad	→	Children (if old enough)
Single male	→	Parents (father)

Source: Mata-Codesal (2011: 103).

The final dyad in Table 4 is the single unmarried male to his parents – usually to the father, even if the responsibility for managing the daily household budget falls to the wife. Given the relatively large size of families in rural Ecuador, many village-based families have more than one son abroad and life for the parents can be relatively well-supported. Sometimes, indeed, both the husband and one or more sons are in the US. As Rosa (51, husband

and three sons abroad) put it, 'Here you can live well on money from the US'. But this improvement in material well-being is not without its negative side. Loneliness and long-term physical separation are often mentioned as major drawbacks of emigration by remittance receivers:

Sometimes I miss them [her children abroad]. I did not want them to emigrate, but they told me: 'We can't just stay here with you, starving.' Now, I buy 50 cents of bananas and they go bad, there is no one to eat them. I wish they would be here to eat them. When people are alone, this is bad. But you have to be hard-hearted

(Graciela, 48, widow with four migrant children in the US).

Also, where there are several migrants from the same family, the financial burden of sending remittances is shared, which lightens individual responsibility. In the case of parents who have both migrant and non-migrant children, the former are responsible for providing financial and material support, whilst the latter perform the local care of the older generation. Obviously this division of the financial responsibility and emotional caring depends on agreement between the siblings. As Pribilsky (2004) found in another part of highland Ecuador, those families who can *convivir* (live side-by-side) have better relationships and are more likely to succeed economically and socially.

On the whole, Xarbán's remittance dynamics tend not to challenge traditional gender roles but are patterned within them. Men are still cast in the breadwinner role, albeit from afar, and women stay at home taking care of the household and the children. Some reordering, however, does occur in generational relations. Where migrants remit to support their parents, a kind of role reversal occurs. As a father remarked: 'How can I complain [about my children] if we live on them! Before we were the parents, now they are our parents'.

The case of Xarbán should not be generalised too widely, however. Parallel fieldwork by Mata-Codesal (2011) in another Ecuadorian highland community where most emigration is of females to Spain shows much more fundamental gender-role adjustments. Research by Bastia and Busse (2011) on international migration from Bolivia and Peru uncovers a variety of gendered effects. Women's autonomous migration from Bolivia to Argentina shows 'gender gains' to be short-lived. Those who migrate to Spain achieve greater independence but patriarchal relations are reconstituted when return migration takes place. Peruvian migration to the US replicates the Ecuadorian model, being led by men with women left behind to fulfil childbearing, household and caring duties (Julca 2005).

5.3. Burim and Thessaloniki

Table 5 displays the four main dyads for households in Burim. Unsurprisingly, there is some similarity with the patterns in Xarbán. The crucial difference is that Albanian migration has evolved from a pattern of undocumented males working in Greece in the informal labour market to a subsequent stage where most migrants are legally present (albeit dependent on time-limited sojourn and work permits) and are able to bring in their families. Hence Albanian remittance dyads have been dynamic over time, reflecting the changing structure of the transnational family (Levitt and Lamba-Nieves 2013).

Table 5.   Main remittance dyads, Burim.

Sender (Thessaloniki)		Receiver (Burim)
Married male migrant alone abroad	→	Wife (and children)
Single Male	→	Parents (father)
Married male migrant alone abroad	→	Extended family (father)
Married couple abroad	→	Husband's parents (father)

Source: Vullnetari and King (2011: 113-123).

Despite this progressive trend towards family-settlement migration, the most common dyad from the household survey remains that from the migrant husband to his village-based wife, who usually has children to look after. Within this main dyadic type there are two variations. In the first, the husband works in Greece all-year-round and makes occasional visits to the village. The relatively short distance involved makes this pattern of visits possible, although the husband's full-time work may limit the time available. The second variant is the seasonal migrant, typically a farm worker in Greece, who alternates up to six months in Greece (the time-limit of an agricultural-work visa) with the rest of the time in the village. According to the survey data, average annual remittances from seasonal migrants are less than half the amounts sent by full-time migrants, a difference within reflects not only the different time periods in migration but also different types of work – the long-term migrant is likely to have a more secure and better-paid job. Below, a village interviewee describes the precarious nature of her husband's employment in Greece:

He works in the peach orchards... Then, when that finishes, he goes elsewhere and does welding jobs, whatever he can find, all sorts of work

(Monda, 45, wife of seasonal migrant).

These two subtypes have other differences, more gender-related. Wives whose husbands are away for all or most of the year become *de facto* heads

of household, which is usually seen by them as an extra burden rather than empowerment. For the seasonal-migrant arrangement, the circulating male retains more of the head-of-household role, often integrating seasonal work abroad with farming at home.

Another variant occurs when the recipient wife also has to care for other family members – usually her husband's elderly parents.[4] This arrangement reflects the fact that she 'belongs' to her husband's family and has care duties towards them, which in fact may preclude her from joining her husband abroad. If she is a co-resident with her in-laws, then the remittance dyad shifts and becomes from her husband to his father (the third dyad in Table 5) since he is regarded as the household head. However, if the 'patriarch' is too ill (or deceased), the wife and/or mother-in-law receive and manage the remittances. This is the case in the following quote, where the father-in-law, in his 80s, is very sick:

My husband brings the money with him when he comes to visit... in April, August and New Year... three times a year... There is no fixed amount, it depends on how his work is going. Myself and my mother-in-law, we women manage it

(Elda, 34, three children and husband's elderly parents to care for).

The second-ranked dyad for Burim (Table 5) is from the son to the father. Where the son is single, this will be the main dyad. Remittances from single young male migrants can be quite substantial, especially if they are bound to their parents by a strong sense of filial duty (King et al. 2011); and bearing in mind that they do not have their own nuclear families to support. If the parental household has two or more single sons working abroad, then it is on the receiving end of multiple main dyads, and may accumulate substantial amounts of capital. Regarded as savings rather than remittances, this 'excess' capital will likely be directed towards the selection of a building plot and the construction of dwellings, in readiness for the future marriages of the single sons. Whether these 'remittance houses' will ever be permanently lived in is another question (Dalakoglou 2010).

The fourth dyad in Table 5 concerns remittances from married couples living abroad. Significant remittances are not usually expected from migrants living abroad as nuclear families since it is understood that their main financial duties are towards themselves and their children. However, modest sums may be sent to the husband's parents to support them in their old age; such transfers are labelled 'pensions' rather than viewed as remittances. However these transfers are enhanced in their quantity and regularity if the older generation is looking after the migrants' children – an arrangement which allows both migrant parents to work full-time in Greece.

Thus far we have described and exemplified the four main Thessaloniki-Burim dyads, all sent by males, either to fathers, or to wives if the migrant is married and has migrated alone. In Burim, as in the rest of Albania, women have become increasingly involved in the migration process, albeit hardly ever as 'independent' migrants. To what extent have they become active as remitters? The answer is simple: to a very limited extent. The traditional Albanian family model excludes this since women are regarded as the 'property' of men (their fathers, then their husbands) and hence income earned by married women in migration likewise passes to their husbands and, if remitted, goes to the husband's parents, not her own. This traditional remittance model was found to be still in operation in an earlier study based on remittances sent by migrants originating from northern Albania (King et al. 2006).

However, interview data from Burim found that women were not entirely excluded from the remitting process (see also Smith 2009). Remittances sent along the female line are nearly always 'secondary' dyads. In fact they are not referred to as remittances at all but as 'presents' or as small amounts of money 'just for a coffee' – phrases which clearly denote their informal and unofficial nature. Usually female-origin remittances are sent or given to female kin, above all mothers and sisters (cf. Rahman and Fee 2009). Female remittances to the wife's parents might also occur if two other circumstances arise: the wife's parents have no sons (such 'daughters-only' families are the subject of pity and sympathy in Albania); or the husband's parents are dead. Irene (37) was living in Thessaloniki with her husband and young son. They used to remit mainly to her husband's parents, but they had died.

I don't send them [her parents] money like a pension [i.e. regularly] but whenever some relative goes there [to the village], I would send them €100 or €200 as a *dhoro* [Greek for 'gift']... Besides money we might buy them clothes, we take them food when we visit...

The uses of phrases like 'gifts' and 'just for a coffee' indicate that the conceptualisation and terminology of remittances also needs attention.[5] For now, we return to the main questions underlying our analysis, and interpret them first in relation to the theoretical ideas associated with *social remittances* and *gendered geometries of power*; and secondly in terms of the wider debates on the migration-development nexus.

6.   Discussion: social remittances and gender power relations

Following Levitt (1998: 933-934), social remittances are 'normative structures [which] are ideas, values and beliefs', and 'systems of practice [which] are the actions shaped by normative structures'. It is easy to conceive of gender relations both as a *normative structure* (e.g. patriarchy), and as a *system of practice* – the casual or quotidian encounters and gendered divisions of social roles, including the gendered remittance dyads discussed above. This framework maps onto the two key questions which frame our empirical analysis: firstly the way the normative *structures of family and patriarchy* shape the initial migration and the follow-on practice of sending remittances; and secondly the way that the *transnational gendered social practice of remittance-sending* has the potential to reshape gender relations amongst the transnational migrant community, including non-migrant villagers.

Both sending societies – Xarbán/Ecuador and Burim/Albania – are essentially patriarchal and this patriarchality frames the migration process, which was male-dominated from the start in both contexts. Males made up the substantial majority of the initial migrants; this has held true subsequently for Xarbán, less so for Burim where women have joined the early male-only flows. The gendered power geometries of these migrations are very clear; also the inferior 'social location' of women within the local and (through migration) transnational power hierarchies (cf. Mahler and Pessar 2001). Men have orchestrated the decisions as to who should migrate, determining that their wives and daughters should stay at home, or only join them under the gendered and constrained mechanism of family reunion. The latter option has been made possible by regularisation schemes in Greece, but not the US where most Ecuadorians remain undocumented.

Yet, there are indications that patriarchal control over female migration in Ecuador is far from absolute, since there has been extensive female migration from other parts of Ecuador to Spain and Italy (Boccagni 2009; Gratton 2007; Mata-Codesal 2011). The conclusion, therefore, is that in Xarbán the male near-monopoly of migration is a combination of patriarchy and the migration control regime of the principal destination country, the United States. For Albania, the patriarchal shaping of migration is stronger. Whilst it is true that in both Greece and Italy women now make up more than 40 per cent of the Albanian migrant populations, nearly all of these are dependent wives and relatives. Independent female migration is still rare in rural Albania. Most young women who move abroad on their own are

university students or graduates pursuing higher degrees and professional careers, and come from better-off urban backgrounds (Vullnetari 2007: 44).

Moving to the second key question: what have been the effects of remittances on gender dynamics within the transnational family? For Burim, we observe the following. First, men retain priority in the remittance process, reflecting the overall patriarchy of Albanian society and the more specific patrilinearity of family structures. Second, and countering the first point, some women have been 'allowed', or have insisted, or have resorted to secret means, to send remittances themselves, generally to their parents or sisters. However, the hegemonic male discourse surrounding remittances downplays these female transfers as mere 'gifts' or 'just for a coffee'. Third, the migration of husbands has turned wives into remittance receivers (except where the wife has moved into the household of her husband's parents). If the husband is abroad all-year-round, wives have the responsibility of administering the remittances and the rest of the household – children, livestock, vegetable garden etc. Many complained of these extra economic and management responsibilities. Family separation has emotional costs too, not only for the woman but also for children who lack a father-figure in their everyday lives. The overall effect is to increase women's burden rather than facilitate any 'social relocation' via agency and empowerment.

Many of the points made above also apply to Xarbán. Here too we see a migration process led by men set within a home society where men are accorded more power and status than women. We also note more female decision-making in the management of the household due to incoming remittances and the long-term absence of men in the family. When husbands/fathers return, we find both a wish to reclaim the dominant male role within the family, but also a greater involvement in household chores because of their 'forced training' in these tasks whilst abroad, living in a largely male-only domestic environment. Here is an interview extract from a returnee. Asked whether he has brought back any 'American' habits to Xarbán, he replied:

Mmm... well, the habit I brought is that one has to do everything in the house – washing, cooking, ironing [laughs] because... if you want to save money, you have to do all those things yourself. You get used to it. So, here [in Xarbán] I continue to wash-up and cook. This is more than a habit, it's an obligation... and it is much better here because it is in your own home

(Rigoberto, 42, married returnee from Queens, New York).

Another gender-related change in quotidian practice occurs with the migrant household abroad. Below, an interviewee in Thessaloniki describes

the reality of household life when the need for both spouses to work brings a reallocation of domestic responsibilities:

My wife comes home at six in the evening. Who will cook and clean for me? Who will look after the children? I have to take my share of doing those things… They [referring to people in his home village] don't understand when we explain the tough life in Greece, the conditions we live in…

(Alket, 47, married with family in Thessaloniki).

What is interesting in both these quotes is the extent to which changes in gender norms and practices are the result, on the one hand, of a direct engagement with, and internalisation of, the gender-values of the host society; or, on the other hand, the fact that these changes are forced by the realities of living abroad, either as a functionally single man in New York, or as a hard-working nuclear family in Thessaloniki.

Conclusion

What light do these research results shed on the bigger questions surrounding the links between migration and (under)development outlined at the beginning of the paper? How do remittances contribute to remaking the relationship between poor, remittance-receiving countries and the richer, migrant host countries? Are migration and remittances part of a virtuous or vicious cycle for Albania and Ecuador? The short answer to the last question is 'a bit of both'; but on the whole, we feel that a measure of 'neo-pessimism' (de Haas 2012: 22) is justified.

These issues need to be appraised at two levels: first at the *micro-to-meso* level of individual migrants and their family and community networks. Both Xarbán and Burim are saturated with the effects of migration: most households have relatives abroad and remittances are the mainstay of the communities' economic existence. For farming families remittances are a complement to food produced locally, perfectly exemplifying the NELM model. For Albania as a whole, an IOM study based on detailed questionnaire surveys in Greece and Italy (N=712) and on household surveys in Albania (N=1066) concluded that, at the household level, 'access to a migration network and family exposure to migration (because of the remittances that follow) is one of the most viable means to escape poverty' (de Zwager et al. 2005: vi). Our data confirm this. However, the downside is that the combination of material and social remittances has mainly worked to generate more migration – or at least to foster an imagination or expectation of migration – amongst the younger generation. Moreover, remittances

have reached a stage where they act as a substitute for local economic and employment activity, thereby further depressing the dynamism of the local economy. The main exception is the way that remittances stimulate the local construction sector, reflecting the fervour with which migrants in Burim and Xarbán invest in building new houses in their home villages. Often these houses have symbolic rather than real economic or functional value: they are a physical demonstration of 'success' in emigration and a marker for a future return, although there is no guarantee that such a return, except for holidays, will take place. Although emigration is unlikely to regain the mass-outmigration rates of the 1990s and early-mid 2000s, we foresee that this dependency-cycle of migration, remittances, and more migration will carry forward as long as factors such as limited local employment and career prospects, remoteness, poor infrastructures and unstable local governance continue to bedevil the sending areas.

In terms of the *macro scale* of the national level and the international political economy of remittances, the dependency relationship is equally clear. The earlier 'dependency-school' characterisation of the Mexico-US migration also holds for Ecuador. Here the various components of neoliberalism – privatisation, deregulation, structural adjustment, and dollarisation – have led to a 'devalorisation' of labour, both in the sending context, where in economic terms it is generated as an unwanted surplus, and in the US where it enters employment niches under conditions of extreme precarity. In this scenario, remittances have a social meaning beyond their monetary manifestation and beyond the Levitt definition of social remittances. Paraphrasing Delgado Wise and Márquez Covarrubias (2011: 65), remittances signify the stretching of the social relations of production across the globe in a context of super-exploitation and social exclusion of migrant workers. Rather than an instrument of development, remittances represent a fraction of wage-labour income designated to cover the subsistence of family dependents in the place of origin, including the upbringing and reproduction of future labour migrants.

This neo-Marxist explanatory framework also resonates, to some extent, for the geographically compact Albania-Greece migration and remittance corridor. The dominance of each country in the other's migratory system (most Albanian migrants are in Greece, most immigrants in Greece are Albanians) perhaps implies a more mutual dependency, even a symbiosis (Baldwin-Edwards 2004). Albanian workers have become a structural component of the Greek economy's labour force, socially stigmatised yet willing to do almost any job for low wages. On the other hand, the current contraction and extreme fragility of the Greek economy means that Alba-

nians are the first to feel the pinch as their mostly casual service labour and construction-sector work is dispensed with. In an interesting recent review of the impact of the Greek crisis on Albanian migrants in a small town in northern Greece, Michail (2013) describes a complex picture of adaptation, hunkering down, partial return migration, and above all uncertainty over the future.

Summing up, our paper has offered a rare example of a comparative analysis of gendered migration and remittance dynamics in two contrasting global settings, set within the wide-ranging topical debate over the relationship between migration and development. Deploying the concept of migration dyads and their links to gendered power geometries, we have excavated the main personal patterns of remittance transfers, so often hidden within the black box of monetary sums and spending patterns. Despite differences in geography and family settings, we have found more similarities than differences in the two cases studied.

Acknowledgements

Notes

1. In 2009 the cost of an 'illegal' migration to New York varied between $12,000 and $20,000, depending on the route and the reputation of the *pasadores* (smugglers) hired (Mata-Codesal 2011: 115).
2. However the introduction of a visa requirement in 2003 left family reunion as the main legal entry route. Like Albanian women in Greece, most Ecuadorian women in Spain work as domestic helpers or carers of elderly locals.
3. The survey recorded information not only on the respondent but also other household members, including those abroad. The 15 per cent figure takes into account the larger average household size in Xarbán than Burim.
4. And hardly ever her own parents, who are the responsibility of her brother(s) and their wives. Traditionally, it is the role of the youngest son to take care of parents in their later years. The youngest son is called 'the son of old age' in Albania.
5. We have dealt with this, based on our Ecuadorian and Albanian material, in another paper (Mata-Codesal et al. 2011: 20-30).

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About the authors

Russell King, University of Sussex and Malmö University. Corresponding author.
E-mail: r.king@sussex.ac.uk; Russell.king@mah.se.

Diana Mata-Codesal, Universidad Nacional Autónoma de México.
E-mail: dmcbilbao@yahoo.es.

Julie Vullnetari, University of Sussex.
E-mail: j.vullnetari@sussex.ac.uk.

Are unequal societies more migratory?

Mathias Czaika

Abstract

Are unequal societies more migratory? The position of this paper is: not necessarily, it depends on the type of inequality. By proposing horizontal and vertical inequality between and within ethnic groups as separate drivers of migration, we hypothesize that heightened emigration is a consequence of vertical inequality and feelings of individual relative deprivation, whereas people facing horizontal inequality feel rather strongly about collective relative deprivation, making non-migration more likely. Consequently, inequality and relative deprivation can work in both directions, i.e. either as a driver or a barrier of migration, depending on whether social comparisons are made within or between ethnic groups. Analysis of emigrant stocks for a large set of developed and developing countries show that countries with higher levels of horizontal inequality across ethnic groups show a lower emigration propensity whereas vertical within-group inequality seems rather a reason for people moving abroad. The analysis also shows that the relative size of these behavioural responses depends on people's educational levels which largely reflect their exit opportunities.

Keywords: international migration, inequality, relative deprivation

1.   Introduction

This paper explores the relationship between economic inequality and international migration. I argue that the role of inequality in 'driving' emigration is less straightforward than the existing literature suggests. By proposing inter-group and intra-group feelings of relative deprivation as two different ways of how people may perceive the unequal societies they are living in, I try to add an important new perspective to the analysis of the inequality-migration nexus, which thus far only looks at the role of vertical inequality as a potential driver of migration (Stark 2006).

The quantitative literature on the determinants of international migration largely confirms the assumption that migration decisions of individuals and households are mainly responsive to socio-economic factors, and can thus be considered as relevant drivers on aggregated emigration flows. However, knowledge about the role of socio-economic *inequality structures* and how they shape emigration flows is still very limited. One aspect that seems crucial in generating a better understanding about the drivers of emigration flows is the question of how economic, social, and political inequality and respective feelings of relative deprivation trigger emigration intentions (Czaika and de Haas 2012). For instance, feelings of *collective relative deprivation* as a consequence of inequality and social comparisons across social or ethnic groups can play a decisive role. Such feelings about the state of the 'collective' may lead to quite different behavioural responses than feelings of *personal relative deprivation* that are rather nurtured by a person's own relative position *within* a larger (reference) group or society (Czaika 2012, Czaika and de Haas 2012).

Some migration scholars have investigated the role of absolute and relative deprivation of particular groups in origin communities to explain people's decisions to, or not to, migrate. Hereby, the new economics of labour migration (NELM) has argued that feelings of relative deprivation are a major driver of migration, acknowledging that not only a person's own (absolute) income is relevant in the decision to migrate, but also the relative income of others (Stark 1984; Stark & Taylor 1991; Stark & Yitzhaki 1988). This assumption is confirmed by research in social psychology, which asserts that people not only assess their personal status and outcomes according to an objective and absolute standard, but also according to the situation of *relevant* others. This implies that people may migrate not only to increase their income in absolute terms, but more in general, to improve their relative position with respect to others in their 'reference group'.

Consequently, it has been argued that migration propensities are positively associated with inequality in the origin societies, and micro-level evidence has largely confirmed the hypothesis that relative deprivation in sending communities increases emigration tendencies (Stark & Taylor 1989, 1991; Bhandari 2004; Quinn 2006). Liebig and Sousa-Poza (2004) provide some evidence for the hypothesis that countries with a more unequal income distribution tend to have higher migration propensities. Stark (2006) has provided a conceptual framework for this structural relationship by arguing that relative deprivation of individuals or households is the 'missing link' between economic inequality and emigration. He argues that a higher degree of economic inequality within a country increases feelings of relative deprivation, which ceteris paribus increases people's emigration propensity, and thus, higher emigration rates. We may therefore assume that relative deprivation is conducive to emigration, although it seems neither necessary, nor sufficient, for inducing migration (Czaika and de Haas 2012).

However, almost all of these studies only focus on *vertical* inequality, i.e. within-group inequality among individuals of the same social entity, whereas horizontal (between-group) inequalities are largely ignored (Stewart 2008); at least as a causal factor of migration. The present study therefore analyses the inequality-migration nexus more in detail by contrasting feelings of individual relative deprivation (IRD) and collective relative deprivation (CRD) as separate drivers (or barriers) of migration. Acknowledging that people may simultaneously perceive multiple social identities, I will only focus on *ethnicity* as the distinct marker of social identity. The central hypothesis is the following: horizontal inequality between ethnic groups has a fundamentally different effect on the overall emigration propensity of a country than vertical inequality within ethnic groups.

In the next section I substantiate this hypothesis by proposing the concept of collective (i.e. group-based) relative deprivation as one way to operationalize economic horizontal inequality in contrast to individual (within-group) relative deprivation as a measure for vertical inequality. Section 3 will then provide some preliminary evidence on the size and direction of these hypothesised associations between (horizontal and vertical) inequality emigration flows. The final section summarises and concludes.

2.   Inequality, relative deprivation and migration

2.1.   Inequality and relative deprivation

Most research on the inequality-migration nexus tends to focus on people's individual (and sometimes household) income and its unequal distribution within a community or country (e.g. Czaika and de Haas 2012, Stark 2006). However, this focus on vertical inequality among individuals of the same reference group ignores the group dimension as a vital dimension of human well-being and of social coherence (Stewart 2002, Østby 2011). Sen (1992) argues that general analyses of inequality should focus more on inter-group variations instead of focusing on only inter-personal (i.e. vertical) inequalities.

Migration scholars have attempted to explore the role of income inequality in origin countries in determining individual propensities to migrate. NELM has identified relative deprivation as one of the main motivators for migration. NELM scholars argue that the relative deprivation approach overcomes an important shortcoming of the welfare function approach by making marginal utility of income a function not only of people's own income, but also on the income of others (Stark, 1984; Stark & Yitzhaki, 1988; Stark & Taylor, 1991). They argue basically that the effect of income on utility and well-being is not independent from broader changes in socio-economic settings. For instance, the importance of a set increase in income to a person depends on his or her position in the income distribution (Stark & Yitzhaki, 1988; Stark & Taylor, 1991; Massey et al., 1993; Stark et al., 2009).

This broadened perspective on the role of socio-economic factors in migration decision-making implies that people and entire households may not only migrate to improve their own absolute income, but also to increase their income relative to other individuals or households in their reference group. Stark, in particular, has argued that migration is a consequence of economic inequality in the origin societies (e.g. Stark 2006). A number of micro-level empirical tests have confirmed the hypothesis that feelings of individual relative deprivation as a correlate of vertical inequality increase migration propensities in sending communities (Stark & Taylor (1989, 1991) and Quinn (2006) for the Mexico-US case; Bhandari (2004) for Nepal; and Czaika (2012) for India).[1] Apart from the fact that evidence on the role of vertical inequality (within groups, communities or even countries) is still scarce, IRD within the same social or ethnic group is only likely to play a significant role in explaining migration if the returns on migration are high and 'reference group substitution' unlikely, i.e. people rather compare

with peers at home than those abroad (Stark & Taylor, 1991; Czaika & de Haas 2012).[2]

To date, the migration literature has focused mainly on relative deprivation as a consequence of inter-personal comparisons within a community, region or sometimes even a country. This raises the crucial question about the appropriate reference point for such social comparisons. Sub-national entities with (ideally) clear markers of social boundaries such as ethnic groups seem a relevant reference category for both intra- *and* inter-group comparisons (Czaika 2012). However, this claim for studying the role of intra- and inter-group inequality on migration comes with some methodological challenges. First, group identities are often self-chosen, multiple, and fluent. Thus, boundaries between groups are rarely clear cut and usually blurred, which makes categorization of social groups sometimes arbitrary.[3] And second, even if a robust categorisation of social groups has been identified, the operationalisation and measurability of group identification seems another challenge. Taifel (1982) finds that a certain level of group identification requires the awareness and appreciation of membership including at least some emotional investment into group membership. The extent to which individuals or households identify themselves with a social or ethnic group they 'officially' belong to however, is *a priori* unclear. Beyond this, group identification is sometimes endogenous to group inequality. When people perceive inter-group inequality, the identification with their group may be strengthened. This reinforces perceptions of collective relative deprivation, particularly if others categorise and assign them into groups and thereby consolidate horizontal inequality (Stewart et al. 2005). Consequently, group identification can often be reinforced by cultural, economic and political differentials, which makes its operationalisation even more complex (Gurr 1993).

In societies where economic, social and/or political inequalities coincide with ethnic cleavages, group identification can be a mobilizing agent (Stewart 2002). This hypothesis has predominantly been explored in research on horizontal inequality and conflict (see Cederman et al 2011, Østby 2011, Stewart 2008). Gurr (1993) argues that ethnic identities and grievances may mutually reinforce each other: horizontal inequalities increase the level of group grievances as well as the perception of a common identity. At the same time, the strength of group identity does influence both group grievances and the potential for (political) mobilization.

Groups whose members have been systematically restrained from equal access to economic resources often develop a strong sense of collective grievances. Interestingly, privileged groups may also experience a similar type

of collective grief due to their fear of losing their privileges. For instance, if relatively deprived groups gain political power and demand redistribution of economic or other resources, inter-group inequality is potentially associated with inter-group transfers from richer to poorer groups. Richer groups may perceive these transfers as too large and it may increase their level of collective grievances (Østby 2011). Accordingly, group-based collective action and political mobilization is usually not only initiated by relatively deprived groups but also by the more advantaged groups. Thus, groups with feelings of inferiority or superiority are potentially causing inter-group grievances, tensions and potentially even conflicts (Horowitz 1985). Stewart (2008) reminds us that it is often not only the relatively deprived groups whose resentments trigger group-based collective (political) action. She notes that it is also the relatively privileged who may attack the underprivileged (or the state) as a reaction to what they may perceive as unfair redistribution, or simply out of fear that the relatively deprived may demand more resources and gain political influence.

It is clear though that collective grievance does not necessarily lead to collective action. Only when resources, organisation and opportunities are available along with collective feelings of relative deprivation that create strong group identification and cohesion, can people be mobilized for collective actions including protest and rebellion (Tilly, 1978). Brewer (1991) argues that the willingness of people to make sacrifices for group action is more linked to feelings of collective rather than individual relative deprivation. Thus, improving the situation of the own group may be a more powerful motivation to participate in collective actions than improvement of the individual's condition. Consequently, and using Hirschman's (1970) terminology, horizontal inequality may make the 'voice' option more attractive than 'exit'.

Furthermore, inter-personal comparisons with others outside the boundaries of the own social group may only be a source for feelings of individual relative deprivation and aspirations if these boundaries are perceived as *permeable (Ellemers et al 1990)*. We may assume that ethnic boundaries are rather impervious, and thus, create a relatively high degree of group identification and loyalty. *This implies that due to the fact that members of ethnic groups can hardly change their ethnic identity, social comparisons beyond their ethnic group are rather group-based, and thus, creating feelings of collective instead of personal relative deprivation.*

2.2.   Personal versus collective relative deprivation

Relative deprivation theory (RDT) studies the relationship between adverse outcomes from social comparisons and subsequent perceptions, feelings and behaviours (Runciman, 1966; Walker and Pettigrew 1984; Kawakami and Dion 1993). An unresolved question of RDT remains in specifying, a priori, who compares with whom? A simple social-psychological heuristic suggests that individuals tend to compare with 'similar others' (Brown 2000, Walker & Smith 2000). The notion of similar others implies though that people can assess their individual position both within their ethnic group as well as the overall standing of their entire group with respect to other ethnic groups. Thus, the extent to which social comparisons generate different types of feelings of relative deprivation depends on the situation of peers either within or beyond the own ethnic group.

Runciman (1966) distinguishes two types of relative deprivation that are the result of either intra-group or inter-group comparisons. Personal relative deprivation refers to one's own position in relation to other members within the same social group. On the other hand, collective relative deprivation relates to the status of people's own ethnic group compared to other ethnic groups in a society. Thus, based on both inter-personal and inter-group comparisons, within-group and between-group inequality creates feelings of relative deprivation and as a consequence, discontent and frustration, but also aspirations for individual or collective change.

In the following, I argue that inter-personal comparisons within ethnic groups create feelings of IRD. On the contrary, a poor relative standing of an ethnic group with regard to other ethnic groups creates feelings of group-based CRD for all group members. As a consequence, we may roughly distinguish four groups of people: those simultaneously perceiving either relatively high (or low) levels of IRD and CRD, and those with rather 'mixed' feelings by simultaneously perceiving low (or high) IRD in combination with high (or low) CRD (see Pettigrew et al. 2008). Thus, a person may feel relatively deprived within the ethnic group, but at the same time, the respective ethnic group may be relatively better-off compared to other groups. Some people may even perceive 'double relative deprivation' due to a relatively low standing within their ethnic group and the poor status of the entire ethnic group. In India, for instance, both IRD and CRD are found to be distinct factors in the migration decision-making of individuals and households (Czaika 2012).

2.3. Relative deprivation versus absolute deprivation

People who usually have the strongest perceptions of (individual or collective) relative deprivation are not the poorest and most destitute (Kawakimi and Dion 1993). Therefore, it is rather feelings of relative and not absolute deprivation that are expected to be driving forces of behavioural responses. Some scholars argue that while absolute poverty may lead to apathy and inactivity, comparisons with those who do better may inspire for radical action, and sometimes even violence (Østby 2008).

For instance, Runciman's (1966) study on the causes of social unrest has already shown that people participating in insurgencies are rarely those most deprived. Some migration literature makes similar claims about the fact that it is usually not the poorest in a society who consider or can afford emigration as a way out of poverty (e.g. de Haas 2010). Obviously, scarcity of economic resources and deprivation of other substantive freedoms and capabilities constraints people from moving, particularly internationally. Lack of human capabilities seem to be a significant constraint for migration as is indicated in many less developed countries by comparatively low emigration rates. For Burkina Faso, for instance, Wouterse (2008) shows that long-distance international migration, which generally involves high costs and risks, is mainly only accessible for relatively wealthy households. Thus, we may generally assume that the more a person perceives any form of relative deprivation, the higher is her propensity to migrate. However, this only holds if absolute deprivation and other resource constraints do not create barriers to the individual's ability to migrate. Therefore, absence of absolute deprivation seems to be a necessary, but not sufficient condition for any resource-intensive behaviour such as migration. Perceptions of a fundamental 'aspiration gap', i.e. the discrepancy between one's aspired position and the status quo, explain to a large extent discontentment and some form of individual or collective action (Brown 2000, Czaika and Vothknecht 2012). Interestingly, discontent as a consequence of a substantial aspiration gap is not only prevalent among poorer people, but also, and sometimes even more so, among more privileged people, which makes them more capable and also more willing for proactive behaviour.

What behavioural actions are likely to follow from these different types of relative deprivations? Wright (2001) argues that members of a disadvantaged group may choose collective action, which is intended to improve the circumstances and conditions of the entire social group. Alternatively, relatively deprived members of a (disadvantaged) group may also try to improve their personal situation by taking individual action. In this case, 'an individual focuses on one's personal identity and acts in ways

that distance oneself from the disadvantaged in-group, while attempting to acquire a more advantaged position'(Wright 2001, p. 411). This implies that individual relative deprivation induces individual mobility, whereas collective relative deprivation rather triggers actions for broader social change. By referring to Hirschman's (1970) distinction of 'exit and voice' as two possible behavioural options, we may re-interpret these as alternative responses to feelings of individual and collective discontent.[4] People who feel personally deprived are more likely to prefer individual strategies to change individual circumstances (Walker and Pettigrew, 1984; Walker and Mann, 1987), whereas people who believe that the group they belong to and identify with is relatively deprived are likely to participate more frequently and actively in collective action to pursue broader structural change. Therefore, I subsequently argue that emigration (i.e. the exit option) is a consequence of IRD, whereas people who feel strongly about collective relative deprivation are likely to choose non-migration (i.e. voice). Consequently, inequality and relative deprivation can work in both directions, i.e. either as a driver or as a barrier of migration, depending on whether social comparisons are made within or between ethnic groups. The assumed implication is that feelings of personal relative deprivation are more likely to create aspirations for migration, whereas decisions not to migrate and be loyal to one's own ethnic group may be the consequence of horizontal inequality and associated feelings of collective relative deprivation. Thus, we can formulate the following two hypotheses by specifying vertical and horizontal inequality as separate determinants of migration.

Hypothesis 1: *Vertical inequality as driver of migration*
Endowment with sufficient economic, social and human capital enables individuals and households to generate and realise their desire to migrate. This desire for migration is based on factors that create aspirations to migrate in order to significantly change one's 'life qualities'. Although factors that generate migration aspirations are likely to be manifold, we can argue that intra-group inequality and comparison among individuals belonging to the same ethnic group is a driving factor for generating individual relative deprivation (IRD), which is expected to trigger people's aspirations for migration (*Hypothesis 1a*).

We may further hypothesise that emigration propensities vary by people's capabilities for migration, which are often represented by their respective educational background or skills. Education can initiate and spur migration. Highly educated people have greater capabilities and access to technology and information enabling them to explore job and general

livelihood opportunities in other countries. Educated migrants are also likely to have a greater capacity to adapt in host societies. Thus, although high skilled migrants have generally higher emigration propensities, they are less likely to suffer, and therefore respond less to vertical within-group inequality, making IRD a relatively strong driver of migration for lower skilled migrants (*Hypothesis 1b*).[5]

Hypothesis 2: *Horizontal inequality as barrier of migration*
Hirschman (1970) argues that loyalty is a major condition for behavioural responses such as protest or rebellion (i.e. the 'voice option'), which aim for broader societal changes that go beyond individual concerns. Being loyal to people who are part of, and identify with the same social group implies a relatively strong (emotional) commitment that often overrides individualistic interest (Pfaff & Kim, 2003; North 1981). Therefore, without having a strong loyalty to a social (or ethnic) group, individuals without effective constraints on exiting are more likely to leave. Thus, the likelihood of choosing the 'voice' option, i.e. non-emigration, increases with the degree of group identification and loyalty (Hirschman 1970).[6] Consequently, we can hypothesise that horizontal (inter-group) inequality that induces feelings of collective relative deprivation (CRD) increases the degree of group identification and loyalty, and lowers people's aspirations and intentions for migration (*Hypothesis 2a*). Finally, we may hypothesise that lower skilled migrants respond more strongly to horizontal inequality than more privileged and often better educated people for whom social boundaries are more permeable. Therefore, we should expect that low-skill emigration has a relatively strong negative association with horizontal inequality compared to the emigration of higher skilled people (*Hypothesis 2b*).

3.   Empirical Analysis

3.1.   Methodology and data

In order to test the validity of the outlined hypotheses on the relationship between (vertical and horizontal) inequality and emigration, I outline the operationalization of two key concepts, individual and collective relative deprivation, which are at the core of the following empirical analysis. Hereby, I refer to a standard assumption in NELM that an individual's perception of relative deprivation arises from inter-personal comparisons of his situation with those who are perceived as better off (Stark 2006).

According to Yitzhaki (1979), individual relative deprivation can be defined as an aggregate shortfall of an individual's income with regard to the respective income of all wealthier members of a society, divided by the number of all members of the society. Or, more technically: assuming a continuous income distribution with $F(y)$ representing the cumulative distribution of income and $1-F(y)$ reflecting the percentage of individuals whose income is higher than y. For any individual i of the society, feelings of (personal) relative deprivation are then an increasing function of the percentage of individuals with an income larger than y_i, $– F(y_i)$, times their mean excess income:

$$RD_i = \int_{y_i}^{y^{max}} [1 – F(z)]dz = [1 – F(y_i)] \cdot E(z – y_i | z > y_i) \quad (1)$$

Stark (2006) shows that the total (aggregate) relative deprivation is equal to the total aggregate income times the Gini coefficient of income inequality G in a society with n members:

$$TRD = \Sigma_{i=1}^{n} RD_i = G \cdot \Sigma_{i=1}^{n} y_i \quad (2)$$

Given a country's overall (vertical) inequality, measured by the Gini coefficient, and its average income with GDP per capita as an approximation, and ignoring within-group inequality, we can calculate the overall (i.e. ignoring group boundaries) individual relative deprivation IRD across all members of a society as follows:

$$IRD^{overall} = G \cdot \bar{y} = \frac{TRD}{n} \quad (3)$$

Overall vertical inequality in a society can then be decomposed into two elements: horizontal inequality *between* ethnic groups generating CRD, and vertical inequality *within* ethnic groups generating IRD.

For calculating intra-group IRD, we may assume that individual i, member of ethnic group $k \in K$, perceives feelings of individual relative deprivation IRD_{ik} according to the proportion of in-group members of the same ethnic group k that are richer than individual k times their mean excess income:

$$IRD_{ik}(y_i) = [1 – F(y_{i,k})] \cdot E(z_k – y_{i,k} | z_k > y_{i,k}) \quad (4)$$

At the same time, and given the existence of horizontal inequality, individual i as a member of ethnic group k may also perceive feelings of

collective relative deprivation CRD_{ik}. CRD can be defined as the mean excess income of all non-members of ethnic group k belonging to another ethnic group l which has an average income $\bar{y}_l$ higher than the per capita income of members of group k, $\bar{y}_l$:

$$CRD_{ik}(\bar{y}_{i,k}) = \int_{\bar{y}_k}^{\bar{y}_l^{max}} [1 - F(\bar{z})]d\bar{z} = [1 - F(\bar{y}_{i,k})] \cdot E(\bar{z} - \bar{y}_k | \bar{z} > \bar{y}_{i,k}) \quad (5)$$

This definition implies that collective relative deprivation is equally perceived by all members of the same group.

In most countries, vertical inequality is positively associated with horizontal inequality. It is sometimes possible however, to have considerable inter-group inequality combined with rather low within group inequality, or vice versa. In countries where horizontal inequality forms a salient component of the overall inequality, any ambition to reduce overall inequality may be bound to fail without reducing inequality between groups (Stewart 2002). But typically the between group component of overall (vertical) inequality is relatively small compared to within group inequality (cf. Stewart et al. 2005).

In order to quantify CRD, Cederman et al. (2011) provide a new global dataset on economic horizontal inequality across ethnic groups by providing estimates on per capita income by ethnic group. These data have been generated by combining Nordhaus' (2006) G-Econ dataset on local economic activity with information on settlement areas of ethnic groups (Cederman et al. 2010).[7]

Based on this data on the mean income for each major ethnic group, I am able to calculate measures for countries' CRD (per capita) according to Eq (5). In order to calculate a country's average *intra-group IRD*, i.e. relative deprivation within ethnic groups, I first need to calculate a country's per capita *inter-group IRD* (vertical income inequality) according to Eq (3) for which we use the 1990s ten-year average on each country's Gini coefficient (World Bank 2012). Based on this measure of a country's overall vertical inequality ($IRD^{overall}$) per capita, we can determine a country's average level of *intra-group IRD*, i.e. relative deprivation within ethnic groups, by the difference between the per capita $IRD^{overall}$ and the average *inter-group CRD*. According to our two hypotheses, we expect a positive association between emigration flows and intra-group IRD, and a negative effect for intra-group CRD.

As further control variables we use each country's standardized geographical size as calculated by the Centre d'Etudes Prospectives et d'Informations Internationales (Mayer and Zignago 2006). The usefulness of this variable is justified by the fact that larger countries usually have more

internal opportunities for potential migrants, which make international emigration a less needed, and thus, less aspired option (de Haas 2010).

As already mentioned, the migration literature has shown that it is not generally the poorest people who migrate internationally as economic constraints and limited access to human and knowledge capital are central prerequisites for realising emigration aspirations (Czaika and de Haas 2012). We control for the effect of limited capabilities for migration by considering two alternative proxies capturing access and availability of human and economic resources. A first, standard proxy for resource constraints or affluence is people's income (GDP per capita). However, in the way we have operationalized our horizontal and vertical *income* inequality, we may run into problems of co-linearity between average income levels and our measures of relative deprivation. In fact, intra-group IRD as well as inter-group CRD are significantly correlated with income per capita (around 0.8). That is why the income variable has been replaced by using information on UNDP's human development index (HDI) by averaging for each country (all available) HDI scores during the 1990 (UNDP 2012). Herewith, we try to capture not only economic, but also education and health aspects reflecting a broader definition of human capabilities. We are expecting that this measure approximates average migration capabilities, and is thus positively associated with overall emigration intensity.

Furthermore, we control for the quality of the political and institutional environments (*political violence*) using information based on the Political Terror Scale (*www.politicalterrorscale.org*), which captures levels of political violence and terror that a country experiences ranging from: 'Countries under a secure rule of law' (level 1), to 'Terror has expanded to the whole population' (level 5) (see Gibney et al 2011). What we are expecting is that political terror and instability is positively associated with people's desire to leave the country.[8]

The dependent variable(s) are based on emigrant stock data disaggregated by migrants' skill levels (Docquier & Marfouk 2006). This dataset contains information for 192 independent countries on the number of emigrants at working-age (25 and over) and categorised by their educational attainment (low, medium, high skilled) who have migrated to an OECD country before 2000. Docquier and Marfouk (2006) have re-calculated emigrant stocks based on information on the composition of OECD immigration stocks, which capture about 90 per cent of the worldwide stocks of highly skilled migrants. Obviously, coverage for medium and low skill migrants is significantly lower and estimates have to be interpreted accordingly. In general, and as long as skills transferability is not a major problem, highly

skill workers have a higher propensity to migrate internationally than lower skilled people, which implies that –on average- emigration rates are increasing with skill levels.

Finally, emigration decisions of different skill groups are unlikely to be mutually independent. For instance, large-scale emigration can reduce grievances among those who stay if, for example, emigration of skilled workers creates new opportunities for social mobility for those left behind (Pfaff & Kim 2003). My empirical strategy will take this into account by simultaneously estimating three migration equations for high, medium, and low skilled migrants, respectively. This means that the error term for the ith equation is correlated with the error terms of the other two other equations. Furthermore, our measures capturing horizontal and vertical inequality, respectively, may be endogenous either due to reverse causality or an omitted variable bias. In order to minimise this bias I am using per capita rent of natural resources an instrumental variable. We simultaneously estimate the three equations with a SUR (seemingly unrelated regression) estimator, and as a robustness check, also with a 3SLS estimator.[9]

3.2.   Results

Before providing some preliminary evidence on the type of associations between horizontal and vertical inequality, respectively, on a country's emigration propensity, Figure 1 displays log-linear relationships between skill-based emigration rates and Gini coefficients for 146 countries in 2000.[10]

Skill-specific emigration rates (logged) plotted against countries' Gini coefficients displays the following: (1) emigration rates for high skilled workers are systematically higher than those for medium and low skill workers; (2) emigration rates of high skilled people are higher in societies with high inequality; and (3) low skilled people are less migratory in more unequal societies. Interestingly, these results seem to partly contradict Borjas' (1987) predictions regarding the link between income inequality and migration. Regarding the effects of the skill and income distribution in the home country on emigration propensities for various skill groups, the Borjas model implies that ceteris paribus the more unequal returns on skills (e.g. in terms of wage rates or income per capita) are distributed the more similar are emigration rates across different skill groups. This implies that societies with a relatively equal income distribution should expect a relatively strong positive selection of highly skilled migrants compared to more unequal societies for which we should expect a more balanced or even negative selection of migrants along skill levels.
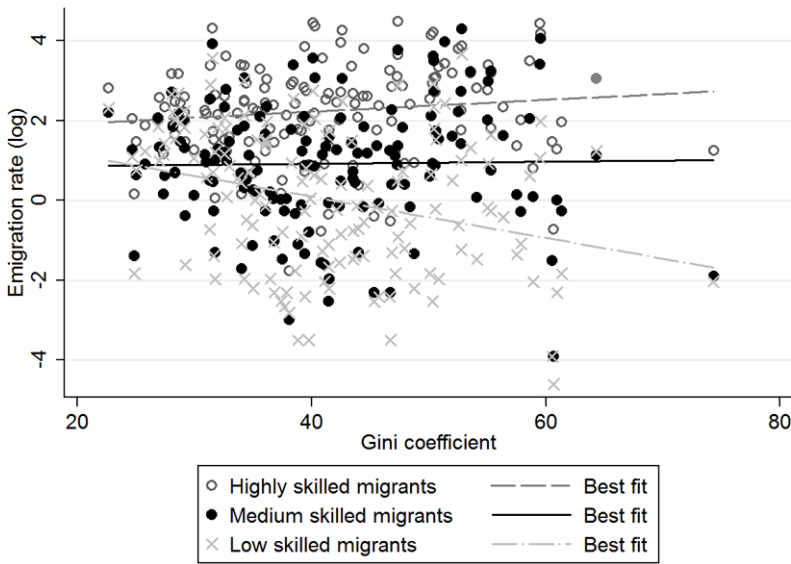
Figure 1: Inequality and skilled-based emigration (N=146).

Figure 1 implicitly shows that the Gini coefficient as a measure of overall vertical inequality is –if at all– rather negatively correlated with total (i.e. independent from skill) emigration rates. This contradicts the theoretical rationale proposed by scholars such as Stark (2006) and also some empirical evidence provided by Liebig-Souza (2004) and others, who suggest that more unequal societies (measured by the Gini coefficient) are expected to experience higher emigration rates, mainly due to a higher level of total relative deprivation. However, an 'overall measure' such as a countries' Gini coefficient ignores the existence of structural inequality and patterns of 'double relative deprivation', which take implications of horizontal and vertical inequalities into account.

Therefore, what matters is not only whether emigration responds to an unequal income distribution in a country, but more importantly, whether within and between group inequalities affect emigration propensities in opposite directions and varying degrees for different skill groups. Social stratification, such as ethnic fractionalization, in combination with relatively strong personal or social identities and respective feelings of relative deprivation are factors that make the role of inequality on emigration less straightforward.

Table 1.   Emigration by skill level: Horizontal versus vertical inequality, 2000, SUR.

DV: Emigrants (log) by Skill	(1) High	(2) Medium	(3) Low	**(4) High**	(5) Medium	(6) Low
High skilled pop (log)	0.418**			0.416**		
	(0.060)			(0.061)		
Med skilled pop (log)		0.282**			0.290**	
		(0.070)			(0.071)	
Low skilled pop (log)			0.208*			0.209*
			(0.087)			(0.086)
Human development (log)	1.140*	3.431**	2.214**	1.690**	4.053**	2.710**
	(0.560)	(0.527)	(0.703)	(0.524)	(0.453)	(0.628)
Country size (log)	-0.258+	-0.253+	-0.198	-0.135	-0.084	-0.017
	(0.136)	(0.150)	(0.181)	(0.137)	(0.151)	(0.178)
Political violence	0.449**	0.508**	0.502**	0.285**	0.317*	0.365*
	(0.121)	(0.142)	(0.166)	(0.109)	(0.127)	(0.147)
Landlocked	-0.732**	-0.783**	-1.038**	-0.976**	-1.040**	-1.286**
	(0.225)	(0.261)	(0.307)	(0.227)	(0.261)	(0.304)
Vertical inequality (intra-group RD)	0.088*	0.097*	0.059			
	(0.043)	(0.049)	(0.058)			
Horizontal inequality (inter-group RD)				-0.415+	-0.676*	-0.896**
				(0.240)	(0.275)	(0.321)
Constant	yes	yes	yes	yes	yes	yes
Observations	109	109	109	116	116	116
R-squared	0.68	0.60	0.47	0.65	0.57	0.45

*Notes: Standard errors in parentheses. Significance levels: ** p<0.01, * p<0.05, + p<0.1. Robustness test in appendix: OLS versus 3SLS (Instrument: Total natural resources rents per capita).*

Table 1 provides some evidence on the direction and extent that horizontal and vertical inequalities are associated with emigration propensities of different skill groups. Estimates for intra-group relative deprivation show that vertical inequality within ethnic groups is positively correlated with emigration. Interestingly though, only high and medium skilled people, i.e. the more privileged population, are significantly inclined to leave the country if exposed to intra-group inequality. On the other hand, for all three skill groups, horizontal inequality seems negatively associated with emigration tendencies. Thus, inequality across ethnic groups has the opposite effect compared to inequality within ethnic groups. Therefore, feelings of collective relative deprivation may work as the behavioural link that turns structural inter-group inequalities into an emigration barrier due to stronger loyalty to their ethnic group. Our estimates show that this 'loyalty

effect' seems particularly strong for lower skilled people whose estimate (-0.896) is more than double the size of the estimate for high skilled people (-0.415). Due to higher opportunity costs, i.e. costs for not leaving are higher for high-skilled than for low-skilled people, better educated people seem less concerned about and affected by structural inequalities across ethnic groups than lower skilled people. Therefore, when faced either with vertical or horizontal inequality, high-skilled people are generally more inclined than the low-skilled population to choose the exit option.

Our other control variables largely show the expected signs. Emigration rates are increasing by skill level, and average human development is positively associated with overall emigration. Interestingly, this relationship is non-linear in skill levels indicating that medium skilled people are becoming more migratory as a consequence of development than high- or low-skilled people. Beyond this, political environment is a robust driver of emigration for all three skill groups, whereas landlocked countries experience less emigration than countries with sea access. Furthermore, there is a weak negative correlation between country size and emigration, which reflects the fact that larger countries are generally less (internationally) migratory because of available internal opportunities, which makes international migration a less attractive option.[11]

4.   Conclusion

Are unequal societies more migratory? The (preliminary) answer is: not necessarily, it depends on the type of inequality.

In fractionalized societies, we usually observe inequality within (i.e. vertical) and across (i.e. horizontal) social groups. This distinction has often been ignored in investigations of the inequality-migration nexus. However, this distinction is important, because people may respond differently to these two types of inequality. In this paper, I have argued that people perceive within-group inequality in terms of feelings of individual relative deprivation, whereas between-group inequality is generating feelings of collective relative deprivation.

Stark (2006) and others suggest that societies with higher income inequality are also characterised by higher migration propensities. However, simple cross-sectional regression analysis on emigration stocks for more than 140 sending countries does not confirm this hypothesis. Overall inequality measured by the Gini coefficient is positively associated with high-skilled emigration and negatively with low-skilled emigration. These somehow

opposing 'effects' are resolved when we use – in my view – more appropriate concepts of vertical and horizontal inequality, which I operationalize by calculating average levels of individual and collective relative deprivation. This shows that emigration propensities are more consistent across skill groups when regressed on these measures of vertical and horizontal inequality. People of all skill levels (and thus, potentially all income levels) emigrate more from countries with relatively high vertical intra-group inequality. This type of inequality is supposed to generate aspirations for personal change and advancement, for which migration is a viable option. On the other hand, people migrate less from countries with relatively high horizontal inter-group inequality.

Interestingly, while the direction of these inequality-migration relationships is quite consistent for different skill groups, the size of these associations reflect some skill-specific patterns. While highly skilled people respond much stronger to vertical inequality within ethnic groups, low-skilled people are significantly more responsive to more structural horizontal inequalities across ethnic groups. This seems to confirm other research that is showing that better education and capabilities spur aspirations for personal advancement, for which, of course, emigration is one possible behavioural instrument. Better education makes people more aware and receptive to outside opportunities, and also more able to realise these opportunities by leaving the country. Poorer and often lower skilled people do not have access to the same set and quality of opportunities, which is why they may be more inclined to be loyal and interested in the fate of their own ethnic group.

In this study, the only marker of social identity is people's ethnicity. In a context of multi-identities, of course, this is a reductionist approach and its only justification is data availability. For future (case) studies it would therefore be interesting to see whether inequality within and across other social identities such as religion, language, class, and so on have slightly different effects on migration behaviour. Compared to other social categories, ethnic boundaries are generally assumed as relatively impermeable, and therefore, able to create a relatively strong element of group identification. Thus, we would expect that ceteris paribus horizontal inequality across ethnic groups has a stronger migration-reducing effect than the same type of inequality for other social categories. Obviously, beyond ethnic or any other type of social identity, factors such as a strong national identity can be the 'glue' that holds a society together, and thus, reducing emigration propensities.

Finally, the reverse impact of massive brain drain on inequality in the sending country for example, has been beyond the scope of this paper. However, it is very likely that emigration of educated and more privileged people may affect vertical as well as more structural horizontal inequality. Depending on whether better educated emigrants are providing opportunities for upward social mobility of relatively deprived or consolidating social inequalities through their financial or social remittances, emigration can either be part of the problem or the solution in overcoming systemic inequality. Empirical evidence on the effect of emigration on horizontal and vertical inequality is not available yet, and therefore conclusive propositions on possible emigration-induced reverse effects on vertical and horizontal inequality are rather speculative.

Possible next steps in gaining a better understanding of the inter-linkages between social fractionalisation, relative deprivation and migration should elaborate more on the role of social identity and attitudes on perceptions of relative deprivation, but also whether and under what circumstances emigration is a strategy to overcome feelings of relative deprivation. For this purpose, more micro-level and case study evidence is needed in order to explore, for instance, whether different types of relative deprivation produce different types of migrants, or whether 'individual migration' is really linked to feelings of personal relative deprivation whereas 'collective migration' may rather result when an entire social group perceives some sense of collective relative deprivation.

Notes

1. In fact, Czaika (2012) provides some mixed evidence for India indicating that individual relative deprivation of households increases propensity for internal migration, whereas the effect on international emigration is rather weakly negative.
2. The same holds true for the role of IRD in migrants' decision about staying or returning home. As long as transnational ties remain strong, migrants main reference group is likely to be the origin community. This explains why many migrants are willing to accept low-paid 3D jobs (dangerous, dirty and demeaning) that natives typically refuse. Although income earned by international migrants in low-skilled and often irregular jobs in construction, agriculture, industry or domestic work is low by Western standards, it is often many times what migrants would have been able to earn in origin countries, substantially raising their socio-economic status in origin communities (cf. McKenzie & Gibson, 2010).
3. Tajfel defines a social group on the basis of criteria which are either external or internal. External criteria are 'outside' designations or characteristics, whereas internal criteria are related to group identification.
4. Obviously, a third alternative is inaction where (relatively deprived) members of a disadvantaged group do nothing to improve their personal or collective situation.

5. Highly skilled migrants, who are the comparatively wealthier migrants, and thus, less relatively deprived within their group of reference in the first place, may (1) compare with peers outside their ethnic reference group; and (2) integrate more quickly and easily to the host country context, and thus, will quickly substitute their original ethnically-based point of reference by a new peer group in the host country (e.g. expats), which most likely affects the return decision more than the actual emigration decision. In the long run, though, reference group substitution is also likely to occur also for lower skilled and culturally more distinct migrants, which explains why the second generation often refuses to do the jobs their parents would have accepted (Czaika & de Haas 2012).

6. Apart from the loyalty effect, collective action for voice, which implies non-migration, is also more likely if the exit option is relatively costly. Exit costs generally depend on various kinds of economic resources, political constraints and social capital, but also on the availability and transferability of human capital. For instance, less educated people face usually higher barriers in transferring their skills and qualifications to another country.

7. The G-Econ dataset assembles data on local economic activity within countries for geographical one degree grid cells, and convert these to comparable GDP figures in purchasing power parity. The data are constructed from a variety of sources, including regional gross product data for the lowest available political subdivision, estimates of regional income by industry, and estimates of rural population and agricultural income. The specific methodologies differ by countries and data availability (see Nordhaus (2006) for a detailed discussion). The database covers about 160 countries, but the temporal scope is limited to observations in 1990.

8. As an alternative measure that would capture the quality of the political climate and environment we considered and tested variables from FreedomHouse (2009) on political and civil rights. In the end, we have decided for the political terror scale variable because it performed better, but results based on the political and civil rights variable can be obtained from the author on request.

9. 3SLS results (additional to OLS) results are reported in the appendix.

10. Find the list of countries including Gini coefficients in the appendix (Table A1).

11. The results of the 3SLS (three-stage least square) regression are reported in the appendix (Tables A4 and A5). The respective results largely confirm the results of the SUR regression (Table 1).

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About the author

Mathias Czaika, International Migration Institute, for International Development, University of Oxford

3 Mansfield Road, OX1 3TB, Oxford, United Kingdom

Phone: +44-1865-281706, Fax: +44 (0) 1865-281801

IMI, University of Oxford

Email: Mathias.Czaika@qeh.ox.ac.uk

Appendix

Table A1.   Gini coefficients (average 1990-2000) of N=146 sample countries.

Albania (29.12); Algeria (35.33); Angola (58.64); Argentina (47.92); Armenia (40.22); Australia (35.19); Austria (29.15); Azerbaijan (34.96); Bangladesh (29.19); Belarus (27.32); Belgium (32.97); Belize (59.56); Benin (38.62); Bhutan (46.74); Bolivia (52.76); Bosnia & Herzegovina (28.03); Botswana (60.96); Brazil (58.95); Bulgaria (28.16); Burkina Faso (48.78); Burundi (37.86); Cambodia (38.28); Cameroon (46.82); Canada (32.56); Cape Verde (50.40); Central African Republic (61.33); Chad (39.78); Chile (55.34); China (41.53); Colombia (56.37); Comoros (64.34); Congo (47.32); DR Congo (44.43); Costa Rica (46.82); Cote d'Ivoire (39.11); Croatia (28.62); Czech Republic (27.43); Denmark (24.70); Djibouti (36.77); Dominican Republic (50.44); Ecuador (52.77); Egypt (31.63); El Salvador (51.40); Estonia (36.05); Ethiopia (34.98); Finland (26.88); France (32.74); Gabon (41.45); Gambia (50.23); Georgia (37.50); Germany (28.31); Ghana (39.44); Greece (34.27); Guatemala (55.31); Guinea (43.73); Guinea Bissau (52.00); Guyana (47.38); Haiti (59.50); Honduras (53.57); Hong Kong (43.44); Hungary (26.99); India (36.80); Indonesia (39.41); Iran (43.55); Ireland (34.28); Israel (39.20); Italy (36.03); Jamaica (40.12); Japan (24.85); Jordan (39.89); Kazakhstan (34.00); Kenya (47.35); Korea (31.59); Kyrgyzstan (41.43); Lao PDR (32.67); Latvia (30.98); Lesotho (60.55); Liberia (52.56); Lithuania (32.00); Macedonia (31.33); Madagascar (42.36); Malawi (50.31); Malaysia (48.44); Maldives (37.41); Mali (50.56); Mauritania (42.13); Mexico (50.47); Moldova (36.03); Mongolia (31.74); Morocco (39.33); Mozambique (44.49); Namibia (74.33); Nepal (37.67); Netherlands (30.90); New Zealand (36.17); Nicaragua (55.12); Niger (38.82); Nigeria (45.73); Norway (25.79); Pakistan (31.30); Panama (55.06); Papua New Guinea (50.88); Paraguay (57.50); Peru (45.56); Philippines (44.74); Poland (31.77); Portugal (38.45); Qatar (41.10); Romania (28.34); Russia (43.99); Rwanda (46.68); Saint Lucia (42.60); Sao Tome & Principe (50.60); Senegal (47.79); Serbia & Montenegro (32.55); Sierra Leone (42.52); Singapore (42.48); Slovakia (22.65); Slovenia (28.80); South Africa (57.90); Spain (34.66); Sri Lanka (33.95); Suriname (52.81); Swaziland (60.65); Sweden (25.00); Switzerland (33.68); Tanzania (34.23); Thailand (43.53); Timor Leste (39.52); Togo (34.41); Tonga (31.52); Trinidad & Tobago (40.27); Tunisia (41.24); Turkey (41.53); Turkmenistan (38.08); Uganda (40.94); Ukraine (29.93); United Kingdom (35.97); USA (40.81); Uruguay (43.92); Uzbekistan (45.35); Venezuela (47.13); Viet Nam (35.60); Yemen (36.45); Zambia (54.08); Zimbabwe (50.10)

Table A2.   Descriptive statistics.

Variable	Source	Obs	Mean	Std. Dev.	Min	Max
Emigrants	Docquier & Marfouk					
Low Skilled	(2006)	194	104195	288147	6	3096853
Medium Skilled		194	85899	211629	99	2408250
High Skilled		194	103518	201227	115	1441307
Population (25+)	Docquier & Marfouk					
Low Skilled	(2006)	194	4875.48	21729.19	2	271159
Medium Skilled		194	9694.76	43603.84	3	467883
High Skilled		194	1858.81	7558.79	0	94168
Income per capita (ppp)	WDI (2012)	220	11687.69	12357.61	312	76403
Human Development	UNDP (2012)	177	0.72	0.17	0.34	0.97
Country size	CEPII (2012)	226	180.44	229.78	0.53	1554.24
Political terror	(Gibney et al. 2011)	179	2.47	1.11	1	5
Landlocked	CEPII (2012)	226	0.16	0.37	0	1
Inequality						
Vertical (intra-group RD)	Own calculation	111	3220.09	3308	160	16947.38
Horizontal (intergroup RD)	Cederman et al (2011)	122	199.88	406	0	2736.72
Gini	Worldbank(2012)	146	41.42	9.96	22.65	74.33

Table A3.   Cross-correlation matrix.

	Emi-grants	Popu-lation size	HDI	Coun-try size	Po-litical vio-lence	Po-litical vio-lence	Vertical Inequal-ity
Population size	0.333	1.000					
HDI	0.262	0.046	1.000				
Country size	0.250	0.492	-0.036	1.000			
Political violence	0.059	0.167	-0.515	0.271	1.000		
Political violence	-0.168	-0.089	-0.277	0.047	-0.032	1.000	
Vertical Inequality (intra-group RD)	0.231	0.058	0.764	0.186	-0.543	-0.140	1.000
Horizontal inequality (inter-group RD)	0.130	0.018	0.264	0.297	0.063	-0.202	0.221

Table A4.   Vertical inequality and migration (OLS vs 3SLS).

DV: Emigrants (log) by Skill	(1) High	(2) Medium	(3) Low	(4) High	(5) Medium	(6) Low
Estimator	**OLS**	**OLS**	**OLS**	**3SLS**	**3SLS**	**3SLS**
High skilled pop (log)	0.699**			0.489**		
	(0.085)			(0.076)		
Med skilled pop (log)		0.759**			0.049	
		(0.101)			(0.085)	
Low skilled pop (log)			0.587**			-0.233
			(0.110)			(0.147)
Human development (log)	-0.397	3.039**	0.752	-3.037	-8.472+	-10.765
	(0.663)	(0.548)	(0.768)	(2.708)	(4.627)	(7.871)
Country size (log)	-0.574**	-0.676**	-0.557**	-0.780*	-1.458**	-1.495
	(0.156)	(0.167)	(0.197)	(0.326)	(0.562)	(0.971)
Political violence	0.348**	0.257+	0.345*	1.201*	3.111**	3.696*
	(0.127)	(0.152)	(0.174)	(0.603)	(0.973)	(1.658)
Landlocked	-0.698**	-0.624*	-0.970**	-0.105	1.113	1.278
	(0.233)	(0.271)	(0.318)	(0.511)	(0.842)	(1.451)
Vertical inequality	0.080+	0.086+	0.053	0.690	2.029**	2.406+
(intra-group RD)	(0.044)	(0.051)	(0.060)	(0.453)	(0.733)	(1.254)
Constant	yes	yes	yes	yes	yes	yes
Observations	109	109	109	109	109	109
R-squared	0.71	0.68	0.53	0.17	-4.08	-6.81
Hausman test (prob>chi2)	.	.	.	0.182	0.182	0.182

Notes: Standard errors in parentheses: **p<0.01, *p<0.05, +p<0.1. Additional instrument: Total natural resources rents per capita.

Table A5.   Horizontal inequality and migration (OLS vs 3SLS).

DV: Emigrants (log) by Skill	(1) High	(2) Medium	(3) Low	(4) High	(5) Medium	(6) Low
Estimator	**OLS**	**OLS**	**OLS**	**3SLS**	**3SLS**	**3SLS**
High skilled pop (log)	0.718**			0.340**		
	(0.088)			(0.060)		
Med skilled pop (log)		0.803**			0.170*	
		(0.103)			(0.072)	
Low skilled pop (log)			0.615**			0.017
			(0.112)			(0.097)
Human development (log)	-0.053	3.506**	1.073	2.946**	5.387**	4.955**
	(0.649)	(0.474)	(0.705)	(0.647)	(0.615)	(0.893)
Country size (log)	-0.483**	-0.582**	-0.412*	0.166	0.347+	0.552*
	(0.158)	(0.171)	(0.196)	(0.171)	(0.194)	(0.250)
Political violence	0.188	0.074	0.210	0.388**	0.488**	0.578**
	(0.114)	(0.135)	(0.154)	(0.127)	(0.149)	(0.191)
Landlocked	-0.935**	-0.820**	-1.213**	-1.193**	-1.394**	-1.690**
	(0.235)	(0.271)	(0.314)	(0.268)	(0.311)	(0.402)
Horizontal inequality	-0.343	-0.479+	-0.821*	-2.222**	-3.352**	-4.138**
(*inter-group RD*)	(0.248)	(0.285)	(0.332)	(0.662)	(0.770)	(0.988)
Constant	yes	yes	yes	yes	yes	yes
Observations	116	116	116	116	116	116
R-squared	0.68	0.65	0.51	0.48	0.25	-0.04
Hausman test (prob>chi2)	.	.	.	0.001	0.001	0.001

Notes: Standard errors in parentheses: **p<0.01, *p<0.05, +p<0.1. Additional instrument: Total natural resources rents per capita.

The Making and Unmaking of Religious Boundaries
Comparing Turkish and Moroccan Muslim minorities in European Cities

Karen Phalet, Mieke Maliepaard, Fenella Fleischmann & Derya Güngör

Abstract

In public debates over multiculturalism in Europe, Islamic values and ways of life are commonly represented as incompatible with Western rights and liberties. Against this background, Muslim minorities have developed generally strong and stable religious identities. This paper asks *when* and *how* multicultural cities and ethnic communities give rise to strong and stable religion. Taking an approach from religious boundary making as a heuristic framework, we bring together a series of five studies on the religious identities of Muslim minorities. The studies compare religious group boundaries and replicate boundary making processes (cf. Wimmer, 2008) across ethnic communities and multicultural cities as comparative cases. Drawing on several large-scale surveys of Muslim minorities, our comparative findings illuminate the making and unmaking of religious boundaries. We conclude that strong religion is 'made in Europe' as institutional rigidities and social inequalities enforce religious boundary making through social closure and cultural maintenance within ethnic communities.

Keywords: boundary making, religion, Islam, Europe, second generation, cultural maintenance

1.   Introduction

The unprecedented scale of continuing immigration from majority Muslim sending countries into the North-West of Europe has transformed the religious landscape of the historically Christian and highly secularised European cities. Majority attitudes towards this new religious diversity have been mixed and they have become increasingly and overtly anti-Muslim in

the aftermath of September 11th (Pew Forum, 2011). In public debates over immigrant integration and multiculturalism, Islamic faith traditions and ways of life are often represented as incompatible with Western cultural values, rights and liberties (Sniderman & Hagendoorn, 2007). In the eyes of the majority, the religiosity of Muslim minorities is a barrier which stands in the way of their societal integration (Foner & Alba, 2008). From the perspective of Muslim minorities, in contrast, their religious identity is a highly valued source of cultural continuity and social support (Ysseldyk, Matheson & Anisman, 2010). Against this background, Muslim minorities in Europe have generally developed strong religious identities, which have been effectively transmitted to the next generation (Voas & Fleischmann, 2012). In the Netherlands, for instance, the second generation of Turkish and Moroccan Muslims report high levels of dietary practice and prayer; and their mosque attendance is on the rise with attendance rates approaching those of the first generation (Maliepaard, Gijsberts & Lubbers, 2012; Maliepaard & Gijsberts 2012). From the perspective of Muslim youth, their religion is a central part of their minority identity and a source of collective self-worth in the face of public hostility (Martinovic & Verkuyten 2012; Ysseldyk, Matheson & Anisman, 2010).

Looking beyond these well-established facts, the present paper asks the question *when and how religious boundary making processes give rise to strong and stable religious identities.* Using boundary making processes as a heuristic framework, we compare multicultural cities and ethnic communities as the proximal integration contexts that set the stage for strong religious identities. Specifically, the paper integrates five separate studies among Turkish and Moroccan Muslim minority groups in in Germany, Belgium, the Netherlands and Sweden.

A rich qualitative research literature documents how religion shapes the identity construals of Muslim minority youngsters in particular countries (e.g., De Koning, 2008 in the Netherlands; Dassetto, 1996 in Belgium; Khosrokavar, 1997 in France; Raj, 2000; Werbner, 2000 in Britain; Schiffauer, 2000 in Germany; Schmidt, 2011 in Denmark; Eid, 2007 in Canada). Looking across countries, however, comparative case studies of religious diversity have mostly privileged top-down perspectives from national institutions and policy regimes (cf. Bader, 2007). Though there have been some recent quantitative cross-nationally comparative studies of religion which have focused on the micro-level (e.g. Connor, 2010; Van Tubergen and Sindradóttir, 2011; Connor and Koenig, 2013), these have largely neglected the European-born Muslims. Our research supplements the above literatures with quantitative comparative strategies. The five studies in this paper exploit micro-level

comparative data on the religious identities of Muslim minorities from several large-scale surveys in the Netherlands and across European cities in the Netherlands, Belgium, Germany and Sweden. It should be acknowledged that the advantage of comparative scope is offset by inherent restrictions in quantitative measures of religion. These measures cannot fully capture the multiple meanings and situated performances of 'thick' religious identities. Yet, our analyses improve on earlier quantitative research by including multiple indicators of religious identification and behavioural practices among self-identified Muslims. Moreover, our studies validate religious constructs across gender, ethnic groups, and cities by way of multi-group measurement models; and comparisons of religious identity are controlled for generally low levels of (parental) education or socio-economic status of Muslim minorities in Europe (Heath, Rothon & Kilpi, 2008).

We start by introducing our theoretical framework on religious boundary making. In a second part of the paper, we address our first research question *when* religious boundaries are more salient, by comparing religious identities of Muslim minorities across cities in studies 1 and 2. In a final third part of the paper, to answer the *how* question, we focus on the micro-processes of social closure and cultural maintenance within ethnic communities (Studies 3, 4 and 5).

2.   Religious boundary making: a heuristic framework

Our comparative strategies and findings are theoretically informed by an integrative approach from religious group boundaries. The boundary framework originates in Barth's (1969) classic *'Ethnic groups and boundaries: The social organisation of cultural difference',* where he pioneered a constructivist approach of ethnicity as a social process rather than a cultural given. Looking beyond ethnicity proper, Lamont and Molnár (2002) define boundaries as evaluative distinctions between groups, such as social classes or races, which are anchored in societal institutions and enacted in daily practices and interactions. The framework was introduced into comparative migration studies by (among others) Bauböck (1998), Lamont (2000) and Alba (2005). Applying a historical-institutional approach of group boundaries to religion, for instance, Alba (2005) argued that religion in Germany and France marks a bright boundary separating (mainly Muslim) immigrants from the mainstream, much like race in the United States. For our purposes, we will draw on Wimmer's (2008) multi-level process model of ethnic boundaries, which bridges the original conception of boundaries

as micro-social processes with macro-level institutionalist approaches. Our main interest is in contextualising religion and not in testing a comprehensive model, so we focus on the crux of the model as it applies to religious boundary making, and emphasise particularly the minority perspective. More precisely, our comparative data and designs loosely correspond to Wimmer's conceptualisation of interlocking macro-constraints and micro-processes of boundary making. Figure 1 gives an overview of our heuristic framework and how the five studies are located within this framework.
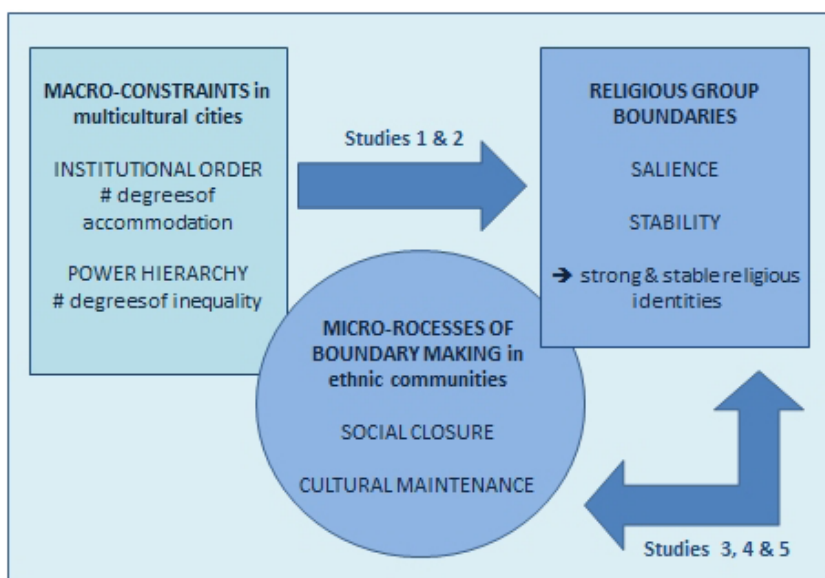
Figure 1: Religious Boundary Making: Heuristic Framework and Studies.

In a nutshell, different institutional orders and power hierarchies in society constitute varying macro-level constraints on group boundaries. As applied to religious boundaries, in the absence of accommodation (institutional orders) and with increasing degrees of inequality (power hierarchies) along religious lines, more salient religious boundaries will define strong religious identities (see Figure 1). Salience refers to the degree of 'groupness' associated with a particular boundary (Wimmer, 2008). When religious boundaries are more salient, for instance, being a member of a religious group is more consequential, not only for religious involvement but also for one's social life. Thus, reasoning from institutional constraints, religious boundaries should be more salient in cities where Islam as a minority religion is less accommodated institutionally. Likewise, power hierarchies differ between

cities, with more inequality and hence more salient boundaries in cities where religious minority status coincides with socio-economic disadvantage. In those cities, the religious identification of the second generation will have more pervasive implications for religious practice and for their societal integration. Conversely, there should be more leeway for selective and ultimately private or 'symbolic' forms of religion (cf. Gans, 1994) in more inclusive city contexts. Moreover, in the latter cities, religious identification would not impede the societal integration of the second generation. To address our first question *when* religious boundaries are more salient, the first part of this paper compares the religious identities of Muslim minorities across cities with varying degrees of institutional accommodation and ethnic inequality (Studies 1 and 2).

Our comparative design focuses on cities, rather than countries, because multicultural cities constitute the proximal context of integration for immigrants and their children. Thus, we do not assume that processes of religious boundary making are unfolding mainly at the national level, but rather focus on multicultural cities as comparative cases because they represent strategic research sites where local, national and transnational forces intersect. As centres of public debate and political decision making, they are most proximal places where national institutions are designed, represented and contested.

In this paper, we reason that institutional arrangements may not coincide with grand national philosophies of integration; yet they have developed in a path-dependent way from existing institutions which are reinvented to accommodate (or not) new forms of diversity. While liberal-democratic states do not – and should not – shape the religious life of their citizens in a deterministic fashion, institutional regulations nevertheless impose real constraints on the development of religious organisations and institutions by immigrant communities (Koenig, 2007, Bader, 2007, Fetzer and Soper, 2005). From a comparative perspective, therefore, we expect a long-term impact of distinct institutional patterns on patterns of integration and religiosity in the next generation, over and above variation as a function of local specificities and more short-term changes in public sentiments and policy responses.

Comparisons across multicultural cities take a top-down approach of religious boundaries from the institutions and structures that are in place and that afford strong religion. But they leave unanswered the question *how* boundaries are made salient. To answer the *how* question, the second part of this paper focuses on the micro-processes of social closure and cultural maintenance within ethnic communities (Studies 3, 4 and 5).

In his multi-level model of boundary making, Wimmer proposed social closure and cultural maintenance as key processes connecting macro-level constraints to the making (and unmaking) of group boundaries. Applying these notions to religious boundaries, we argue that religious boundary making is enforced from the bottom up through binding social ties (social closure) and shared cultural preferences (cultural maintenance) among fellow Muslims (see Figure 1).

3. Comparing religious boundaries across multicultural cities

Taking an approach from religious boundary making as a heuristic framework, this paper sets out to illuminate *when* and *how* multicultural cities and ethnic communities give rise to strong religious identities. We will now address the *when* question.

To empirically ground our comparative approach, we will discuss the main findings from two cross-national studies of the Turkish second generation in up to seven cities in Germany, Belgium, the Netherlands, and Sweden (Fleischmann & Phalet, 2012; Phalet, Fleischmann & Stojčić, 2012). The cities in these four countries were selected because they represent different national histories of church-state relations, which have been extended to incorporate the new religious diversity (Fetzer & Soper, 2005). Moreover, the cities differ in the placement of Muslim minorities in local power hierarchies.

Our main aim is to examine the differential salience of religious group boundaries in different cities. Study 1 compares the different configurations of religious identity and various religious practices across multicultural cities (Phalet, Fleischmann & Stojčić, 2012). Study 2 focuses on the coupling or uncoupling of religious identity and social integration in mainstream society (Fleischmann & Phalet, 2012). Before discussing the findings of studies 1 and 2, we start by discussing differences between national and local contexts in terms of institutional orders and power hierarchies.

3.1. Institutional orders
European cities represent institutional orders which differ in the degree of accommodation of religious diversity and Islam in particular (see Figure 1). City differences are tied up – though not synonymous – with national philosophies of integration, with countries like Sweden, Great Britain, and (until recently) the Netherlands granting some degree of multicultural

recognition of minority cultures, whereas countries like Germany, France or Switzerland put more emphasis on cultural assimilation. In particular, the accommodation of Islam as a minority religion has followed from historically established patterns of church-state relations in each country (Fetzer & Soper, 2005). As we will describe below, distinct institutional pathways come with varying degrees of religious accommodation: they may grant or withhold formal recognition of Islam; and they may facilitate or restrict the establishment of Islamic organisations (Statham et al., 2005). In spite of an abundant literature on cross-national differences in the recognition and accommodation of minority religious traditions across Europe (cf. Maussen, 2007 for a review), there is relatively little empirical research into the consequences of different degrees of institutional accommodation for the ways in which Muslim minorities are defining and performing their religious identities (Voas & Fleischmann, 2012).

From an institutional perspective then, the accommodation of Islam has been least complete in Germany, more complete in Belgium and Sweden, and most complete in the Netherlands (Fleischmann & Phalet 2012). In Germany, Islamic organisations remain disadvantaged relative to established churches both legally and financially. Due to their formal status as corporations of public law, Christian churches profit from taxes collected by the German state. Lacking a centralised organisational structure similar to that of the Christian churches, German Muslims have been denied the same legal status by the German authorities (Fetzer and Soper, 2005).

In Belgium, the status of Islam is formally equal to that of the historically dominant Catholic Church. Yet, in order to receive the state funding for religious services to which they are legally entitled, Muslim communities were required to set up a nationally representative Islamic council as a partner for the Belgian state (Foblets and Overbeeke, 2002). Such a council has been established only recently upon the initiative of the Belgian authorities. Because of the delayed implementation of the recognition of Islam, Islamic organisational structures are less fully developed in Belgium than they are in e.g. the Netherlands.

In Sweden Islam enjoys the same legal status as other religions; and Islamic organisations are entitled to state funding proportionally to the size of their membership. However, Sweden has historically known a state church, which still counts more than 80 per cent of the Swedish population as its members (Alwall, 2000). Although the privileged position of the Swedish Lutheran Church has been dismantled in the second half of the twentieth century, the legacy of the state church system implies that Islam occupies a relatively marginal position.

Due to the Dutch history of 'pillarisation' (Lijphart, 1968) and despite increasing secularisation among the majority population, pluralist church-state relations created opportunities for Muslims to develop their own institutions (Rath et al., 1996). Thus, Dutch Muslims have established numerous local mosque associations, as well as state-funded Islamic broadcasting networks and Islamic schools (Doomernik, 1995). From an institutional perspective then, Dutch Muslims were granted formal equality with Christian and other religious groups from the early 1980s onwards; and they made the most of the opportunities offered by the Dutch system.

3.2.   Power hierarchies

Looking beyond formal institutions, Wimmer (2008) defines power hierarchies in terms of degrees of inequality between groups in society. As comparative indicators of inequality, we rely on educational attainment, as well as the degree of residential segregation of Muslims. Power hierarchies derive from – and perpetuate – objective group differences in access to resources. Whereas lower educational qualifications reflect restricted resources in immigrant families, higher qualifications are a prerequisite for the second generation to gain access to stable and well-paid jobs. Moreover, at higher levels of ethnic segregation in neighbourhoods and schools, the second generation has less access to the mainstream cultural and social resources that are typically valued in school and in the labour market. Our study compares across cities in four countries that differ in their placement of Muslim minorities towards the bottom end of relatively enduring power hierarchies.

The German cities represent the most exclusionary end with very high degrees of educational inequality and residential segregation (Crul, Schneider & Lelie, 2012). In contrast, Stockholm clearly represents the more inclusive end, with relatively low degrees of inequality and segregation, and with significant numbers of the second generation enrolled in higher education and present in majority neighbourhoods. Finally, Dutch and Belgian multicultural cities fall in between these two ends, with small portions of the second generation entering higher education and moving into majority neighbourhoods. Importantly, city-level comparisons allow further distinctions within countries between the capital cities of Berlin, Amsterdam and Brussels and the cities of Frankfurt, Rotterdam and Antwerp respectively. Especially the industrial economies of Rotterdam and Antwerp represent more uneven integration contexts for the second generation than Amsterdam and Brussels due to their more polarised labour market as well the more restrictive public opinion climate due to the greater

success of right-wing political movements in the harbour cities. From a boundary approach, we reason that religious practice will be most strict (Study 1) and religious identity least compatible with societal integration (Study 2) in cities where Islam is less accommodated institutionally and where Muslim minorities are more socially disadvantaged.

3.3.   Private, selective and strict religious identities

In Study 1, Phalet, Fleischmann and Stojčić (2012) examined the salience of religious group boundaries among the Turkish second generation. We operationalised the differential salience of religious boundaries between the cities in terms of the coupling (or uncoupling) of religious identity with behavioural involvement in religious practices. To compare differential salience across cities, we asked how the European-born children of Turkish immigrants identified with, and practiced, their Islamic religion. We reasoned that strict forms of religious identity mark salient group boundaries between religious in-group members and outsiders. Where group boundaries are less salient and more fuzzy, therefore, selective or private forms of religious identity should be more common.

Study 1 draws on large-scale surveys among random samples of second-generation Turks in seven European cities, using the cross-national TIES surveys ('The Integration of the European Second generation'; Crul et al, 2012). Parallel surveys were conducted in Germany (IMIS 2008), Belgium (CeSo-CSCP 2008), the Netherlands (IMES-NIDI 2007-2008) and Sweden (CEIFO 2008). Because religion questions were only asked of participants who self-identified as Muslims, the analyses did not include secular or Christian Turkish participants. Most Turkish second-generation participants in the Belgian and Dutch cities were self-identified (mostly Sunni) Muslims (over 75 per cent). In the German cities close to 70 per cent, and in Stockholm over 40 per cent self-identified as Muslim, excluding secular Turks and Turkish Christians. This resulted in comparison samples of Turkish Muslims in Berlin (N=156), Frankfurt (N=185), Antwerp (N=330), Brussels (N=194), Rotterdam (N=205), Amsterdam (N=166) and Stockholm (N=118). It should be acknowledged that the data have a number of limitations, including the differential selection of Muslims from ethnically defined Turkish samples and the cross-sectional nature of the data (cf. Crul et al, 2012 for more details on data constraints). Nevertheless, Turkish Muslim participants were roughly comparable across cities, with most immigrant parents being highly religious and less qualified immigrant workers from less developed rural regions in Turkey (yet somewhat more secular and qualified immigrants in Brussels and Amsterdam; see Table 1).

Table 1. Turkish Muslim minorities in seven cities: Immigrant selectivity, institutional order and power hierarchy, and the distribution of types of religious identities.

	Ber-lin	Frank-furt	Ant-werp	Brus-sels	Rotter-dam	Am-ster-dam	Stock-holm
Selectivity:							
- Secular father	Few	Few	Few	Some	Few	Some	Many
- Qualified father	Few	Few	Few	Many	Some	Some	Few
Institutional order:							
accommodation	Low	Low	Moderate	Moderate	High	High	Moder-ate
Power hierarchy:							
- % tertiary qualifications	Low	Low	Moderate	Moderate	Moderate	Moderate	High
- % other ethnic neighbours	Very low	Low	Low	Very low	Low	Moderate	Moder-ate
Types of religious identity:							
- % Private Muslims	16.7	15.1	21.6	24.6	25.9	20.5	52.9
- % Selective Muslims	33.3	43.8	33.4	47.6	32.1	50.0	24.5
- % Strict Muslims	50.0	41.1	45.0	27.7	42.0	29.5	22.6

Source: TIES 2007-2008.

Looking beyond institutional accommodation, we found that cities differ in the degrees of ethnic segregation and inequality (see Table 1). Thus, self-reported residential segregation was highest in Berlin and Brussels, with over 50 per cent of the participants living in majority-Turkish neighbourhoods. Self-reported segregation was also quite high in Frankfurt (40 per cent), with moderate segregation in Antwerp and Rotterdam (35 per cent), and the lowest levels in Amsterdam and Stockholm (30 per cent). Similarly, participants' educational qualifications document city differences in the degree of persistent disadvantage. These differences are all the more remarkable against the background of similarly low qualifications of Turkish immigrant parents across the cities (see Table 1). Specifically, Turkish-Muslim participants with higher (tertiary) qualifications were most absent in Berlin and Frankfurt (3 and 5 per cent resp.) and most present in Stockholm (31 per cent); with intermediate rates of higher qualifications in the other cities (ranging from 15 to 20 per cent).

To establish different types of religious identity within each city, K-means cluster analysis was conducted separately in each comparison sample, using a reliable four-item measure of religious identification (e.g. "Being a Muslim is an important part of my self") as well as frequencies of religious practices, including ritual practices such as prayer and attending religious

gatherings, and dietary practices such as fasting and observing the rules of consumption ("halal"). Across all seven comparative contexts, the same three clusters could be replicated and were labelled as "private", "selective" and "strict" types of religious identity, with most religious practice among strict Muslims, less (mainly dietary) practice among selective, and least among private Muslims.

While the same three types of religious identity could be distinguished in each city, the distribution of participants over the religious types differed considerably between the cities (see Table 1). In line with our expectations, strict forms of religious identity were more prevalent in cities that were less accommodating of Islam and where Muslims occupied a lower position in the local power hierarchy. At the most exclusionary end (second generation in Berlin), strict Muslims were the largest subgroup and private Muslims the smallest subgroup of Turkish Muslims. Similarly in Frankfurt, private Muslims were least frequent, yet strict and selective types of Muslims were roughly equally numerous. Note that significant portions of secular Turkish participants in German cities (around 30%) suggest polarisation between strong religion and secularism. At the multiculturalist end of the spectrum, in contrast, more than half of the Turkish Muslim participants in Stockholm were counted as private Muslims, while the other half was split evenly between selective and strict types of religious identity. Note that Stockholm also counts significant numbers of Christian Turks (who were not included in this analysis). Findings from the Belgian and Dutch cities were somewhere in between, with selective Muslims being the most prevalent type in Brussels and Amsterdam, and strict Muslims prevailing in Antwerp and Rotterdam. Interestingly, these findings highlight city differences within the same countries, with higher degrees of inequality and more salient religious boundaries in both port cities alike than in the capital cities.

To sum up, the patterning of different types of religious identities across the seven cities reveals meaningful city differences in the salience of religious boundaries. Moreover, the overall pattern is in line with different macro-constraints on group boundaries in the different cities. We conclude that the national accommodation of Islam interacts with local power hierarchies to afford more selective or private types of religious identity in some cities (like Stockholm, Amsterdam or Brussels) versus more strict religious identities in other cities (like Berlin, Frankfurt, Antwerp and Rotterdam).

3.4.   Religion and social integration

Study 2 takes a somewhat different angle on the salience of religious group boundaries among the Turkish second generation. In this study, Fleischmann and Phalet (2012) operationalised the salience of religious boundaries in terms of the social consequences of religious identity. More specifically, the study examines the coupling of religious identity with social integration in other (non-religious) life domains. We used the same cross-national TIES surveys (cf. supra) to compare second-generation Turkish Muslims in the capital cities of the four countries under study. The main aim of the study was to test the association (or dissociation) of Islamic religiosity and the social integration of Muslims into the wider society. Where religious boundaries are more salient, religious identities will have more pervasive social consequences in the lives of individuals and in the organisation of society (Wimmer, 2008). We reasoned that the enhanced 'groupness' of Muslim minorities in cities with salient religious boundaries would impede the societal integration of religious Muslims. As indicators of social integration, the study included educational attainment, labour market participation, and interethnic marriage. To assess religious identities, four cross-culturally valid dimensions of religion were distinguished in multi-group confirmatory factor analysis: religious identification, worship, dietary practice and public assertion (such as wearing the headscarf). The associations of religiosity with the social integration of the Turkish second generation was compared across the four capital cities of Berlin, Brussels, Amsterdam and Stockholm.

Extending the above argument about the differential salience of religious boundaries from institutional orders and power hierarchies in cities, we expect (most) negative associations between religious identity and societal integration in cities like Berlin, with low degrees of accommodation (institutional order) and high inequality (power hierarchy). In cities like Stockholm, on the other hand, where Islam is formally accommodated and where Muslims are less socially disadvantaged, religious boundaries are less salient and religious identity should be more compatible with societal integration. Accordingly, multiple regressions of religious identification, practices and assertion on social integration reveal an inverse relation in Berlin. In the German capital, the most religious members of the Turkish second generation had the lowest levels of education and were most likely to have co-ethnic, rather than interethnic, close ties. Conversely, in Amsterdam, Brussels and Stockholm, second-generation religious identity was decoupled from social integration in mainstream society. No significant associations were found between religious identity and any indicator of

societal integration. In spite of varying degrees of accommodation between Brussels (least), Stockholm and Amsterdam (most), the three cities have in common the significant (though varying) degree of institutional accommodation of Islam, relative to the German capital.

We conclude that the comparative findings from both studies suggest less salient religious boundaries in Brussels, Amsterdam and Stockholm than in Berlin. In the former cities, second-generation Turkish Muslims more often prefer selective or private types of religious identity, which are compatible with social integration into mainstream society. In Berlin, in contrast, where religious boundaries are highly salient, the Turkish second generation more often adopts strict ways of being Muslim, which stand in the way of their societal integration.

4.   Religious boundary making within ethnic communities

We have seen that the salience of religious boundaries is related to the institutional and societal context in which Muslims are embedded. In this part of the paper we complement these cross-national comparisons with bottom-up perspectives from boundary making processes within Turkish and Moroccan communities (the *how* question). Drawing on Wimmer's framework we propose a bottom-up approach of religious boundary making. More precisely, we relate the religious identities of Muslim minorities to the micro-processes of cultural maintenance and social closure in different ethnic communities. Specifically, Study 3 asks whether religious boundaries are more stable in community contexts with higher levels of closure and maintenance (Maliepaard & Lubbers, 2013). The differential stability of religious boundaries is operationalised here as the more or less effective transmission of religion to the next generation. Study 4 replicates differential stability across communities and tests whether stability is explained by enhanced culture maintenance orientation among highly religious Muslims (Güngör, Fleischmann & Phalet, 2011). Finally, Study 5 focuses on the process of social closure as it relates to the salience of religious boundaries across ethnic communities. We argue that Muslims with more co-ethnic social ties will show stronger religious identities, especially in the more close-knit Turkish community context (Maliepaard & Phalet, 2012).

4.1. Comparing ethnic communities

Some degree of social closure has been associated with sustained religiosity in immigrant minorities. For instance, close-knit kinship ties and dense ethnic networks are reliably related to immigrant religiosity in the US (Ebaugh & Chafetz, 2000). Also in European societies, as generally less religious receiving contexts than the US, co-ethnic ties predict sustained religiosity among immigrants (Van Tubergen & Sindradóttir, 2011). Ethnic communities differ in their degree of social closure. In the European migration context, Turkish and Moroccan minorities represent major Muslim minority populations with a predominantly Sunni Islamic background (Voas & Fleischmann, 2012). Both groups have in common their migration histories as guest workers; and their current living conditions are characterised by high overall segregation levels, persistent disadvantage, and pervasive discrimination (Heath et al., 2008). At the same time, they constitute distinct ethnic community contexts for the second generation, with generally higher levels of cultural maintenance and social closure in Turkish than in Moroccan communities. For instance, strong family values and strict parental control are the rule in Turkish immigrant families (De Valk & Liefbroer, 2007). Likewise, Turkish immigrant communities show more residential concentration around ethnic business or industrial niches, more dense ethnic associations, and higher levels of ethnic language and media use as compared to Moroccan communities (Phalet & Heath, 2010). Hence, we expect more religious boundary making in most culturally rooted and socially bounded Turkish (vs. Moroccan) communities. To test this expectation, we will discuss three studies which develop cross-ethnic comparative perspectives on religious boundary formation.

Immigrant families instil religion in their children as part of a more general orientation towards the heritage culture (Regnerus, Smith & Smith, 2004). There is much evidence of the purposeful and effective transmission of heritage cultural values and norms in immigrant families. For instance, Turkish and Moroccan immigrant parents tend to transmit their conservative family values and gender role values to the next generation; and value transmission has been related to parenting practices that stress restrictive control and conformity goals (Kwak, 2003; Phalet & Güngör, 2009). Along similar lines, acculturation research shows the continued importance of the heritage culture and identity among the European second generation, and among Turkish and Moroccan Muslims in particular. Typically, they combine a strong orientation towards cultural maintenance with simultaneous orientations towards the mainstream culture (Berry, Phinney, Sam & Vedder, 2006).

A separate strand of research in religious studies shows the key role of families in the religious socialisation of children (Myers, 1996; King, Furrow & Roth, 2002). Little is known, however, about the transmission of religious identities to the second generation of Muslims, which underlies stable religious boundaries in European societies. Focusing on boundary making within ethnic communities, the three studies in this section examine the family socialisation of religion through parental role modelling (Studies 3 and 4), as well as community-based religious education (Study 4), and social control in co-ethnic peer networks (Study 5).

4.2. Cultural maintenance

The stability of religious group boundaries is premised on the successful transmission of religion across generations. Cultural transmission from one generation to the next takes place through goal-directed and explicit socialisation and through more implicit daily routines and social role models which instil norm-congruent behaviours (King, Furrow, & Roth, 2002). In the religious domain, parental religious practices, such as parents' mosque visits, serve as social models of desired religious behaviours in children and imply the habitual involvement of the parents in the religious life of their community. In addition, early enrolment in Koran lessons exposes Muslim children to formal religious teaching and implies purposeful parental and communal investments in children's religious socialisation. In Study 3 Maliepaard and Lubbers (2013) compared parent-child dyads of self-identified Turkish and Moroccan Muslims in the Netherlands, using subsamples from periodic large-scale minorities surveys by the Netherlands Institute for Social Research (SPVA 1998 (Martens, 1999); SPVA 2002 (Groeneveld & Weijers-Martens, 2003). As expected, immigrant parents transmitted Islamic religious practices and attitudes to their children, so that the children of more religious parents were themselves more religious later in life, thus securing the stability of religious boundaries separating the second generation from the mainstream society. For instance, regular mosque attendance by immigrant parents strongly predicts regular attendance in their children. Similarly, Muslim youngsters tended to endorse the religious attitudes of their parents, such as the preference for a Muslim marriage partner. Finally, when religious transmission was compared across Turkish and Moroccan minorities as different community contexts, the parental socialisation of religious practice, but not of religious attitudes, was most effective in most culturally bounded Turkish immigrant communities. These findings suggest that high levels of cultural maintenance and social closure at the

community level afford the making of religious boundaries through the social control of religious behaviour within the ethnic community.

Study 4 follows up on the differential stability of religious boundaries between ethnic communities; and asks the question how religious socialisation and cultural maintenance interact to produce stable boundaries (Güngör, Fleischmann & Phalet, 2011). In a cross-ethnic comparative study of self-identified Turkish and Moroccan Muslims in Belgium, we used retrospective data on the religious socialisation of children from the Belgian TIES surveys ('The Integration of the European Second generation'; Swyngedouw et al, 2008). Religiosity was reliably assessed in terms of religious identification, worship and dietary practices, and belief or orthodoxy (such as literal interpretation of the Koran). Combining family- and community-based religious transmission, religious socialisation was assessed by retrospective questions about the frequency of parents' mosque visits (family-based transmission) and the attendance of Koran lessons during childhood (community-based transmission). The study examines the stability of religious boundaries by relating religious socialisation in childhood to the adult religious life of second-generation Muslims. First, we replicate and extend the cross-ethnic comparison of religious transmission in Study 3, by testing how religious transmission differs between Turkish and Moroccan Muslim communities. In addition, we examine whether individual differences in cultural maintenance orientation mediate religious stability across community contexts.

As expected, multi-group structural equation modelling across ethnic community contexts revealed stronger religious identities, in terms of their religious identification, beliefs and practices, for adult Muslims whose parents had visited a mosque regularly and who had attended Koran lessons in their childhood. While both forms of religious transmission uniquely predicted religious identification and behavioural involvement, only religious education predicted orthodox religious beliefs. The latter finding suggests that community-based religious instruction is crucial for the stability of religious beliefs as an explicitly cognised component of religiosity. Moreover, and in line with the previous study, in the Turkish community context with its high level of cultural maintenance and social closure, religious transmission is most effective. Religious boundaries were thus most stable among Turkish than among Moroccan Belgian Muslims. Last but not least, childhood religious socialisation predicts stable religious identities into early adulthood through enhanced cultural maintenance orientations among Muslim youth.

4.3. Social closure

In Study 5 Maliepaard and Phalet (2012) used large random samples of self-identified Turkish- and Moroccan-Dutch Muslims from the 2006 Survey Integration Minorities (SIM) by the Netherlands Institute for Social Research (Dagevos, Gijsberts, Kappelhof & Vervoort, 2007). In this paper we shifted focus from cultural maintenance to social closure as a key boundary making process within the ethnic community. And we predicted the salience of religious identities, in terms of their consequences for religious practices. Replicating contextual differences between Turkish and Moroccan communities, we also tested whether religious boundaries are most effectively enforced in most densely networked Turkish communities.

To assess social closure, participants reported the frequency of co-ethnic social contacts with Turkish or Moroccan friends and neighbours, as well as their cross-ethnic contacts with Dutch friends and neighbours. As a measure of salience, religious identification was related to religious practice (such as praying and fasting) and public assertion (such as wearing the headscarf) as distinct forms of behavioural involvement in the religious domain. In accordance with our expectations, multi-group structural equation models showed significant net effects of co-ethnic peer networks (controlling for cross-ethnic ties). Muslims who were more embedded in ethnic networks were also more strongly identified with their religion, more ready to endorse public recognition and accommodation, and engaged more often in religious practices. Thus, religious boundaries are more salient in the lives of Muslims who are embedded in ethnic networks. Moreover, ethnic peer networks were most influential in most culturally bounded Turkish communities, as evident from the differential impact of co-ethnic peers on the religious practice of Turkish and Moroccan Muslims. Ethnic differences were significant only for religious practice, however. This latter finding is in line with the previous two studies and suggests that religious boundary making operates through the social control of religious behaviour in densely networked ethnic communities.

Conclusion

The starting point of our comparative research on the religious identities of European-born Muslims is a combination of two well-documented facts. First, there is converging evidence of sustained and strong religion among second-generation Muslims in Europe. Second, Muslim minorities face real ethnic discrimination and increased public hostility against Islam in

European societies. This raises the question how the religious identities of Muslim youngsters are jointly shaped by social forces within ethnic communities and in the wider society. Taking a heuristic approach from religious group boundaries, we addressed the question *when* and *how* multicultural cities and ethnic communities give rise to strong and stable religious identities. We developed comparative arguments and discussed comparative findings with a view to contextualise religious identity and to articulate the underlying processes of religious boundary making. Drawing on central aspects of Wimmer's (2008) integrative multi-level process account of ethnic boundaries, our studies supplement a comparative approach from the macro-level of institutional and structural constraints in multicultural cities with a bottom-up approach from micro-processes of boundary making within ethnic communities. Taken together, the studies develop a twofold comparative approach across multicultural cities and across ethnic communities as proximal integration contexts, emphasising boundary formation from a minority perspective.

First, cross-national comparisons across the cities in the first two studies speak to the question *when* religious boundaries are made salient. The cities were selected so as to cover a range of different institutional orders and power hierarchies along religious lines. As expected from macro-constraints on group boundaries, our findings provide evidence of more strict forms of religious identity in cities where institutional rigidities and social disadvantages define highly salient boundaries. Strict Muslims combine religious identification with the full range of dietary and ritual practices, whereas the religious identities of selective and private Muslims are partly or totally uncoupled from behavioural involvement in the religious domain. Comparing across German, Belgian, Dutch and Swedish cities, the religious identities of local-born Turkish Muslims reflect the differential salience of religious boundaries between cities. Thus, more strict forms of religiosity prevail in cities like Berlin, where a lack of institutional accommodation conspires with relatively high degrees of ethnic segregation and inequality to define salient group boundaries. In contrast, more private and selective forms of religious identity come to the fore in cities like Stockholm or Amsterdam, which offer some degree of accommodation and where some degree of social mixing and upward mobility amount to the unmaking of religious boundaries. Moreover, we find more salient religious boundaries in the industrial cities of Antwerp and Rotterdam than in the respective capital cities, in line with our focus on cities rather than countries as comparative cases. Also in line with the differential salience of religious boundaries between cities, the religious identities of Muslim minorities

were detached from social consequences in terms of their societal integration in cities like Amsterdam, Stockholm or Brussels, which grant some degree of institutional accommodation of Islam as a minority religion. The exception to the rule was Berlin, where religious involvement was inversely related to societal integration, as indicated by the lower education of more religious Muslims for instance.

Second, cross-ethnic comparisons in the last three studies address the question *how* boundary making processes give rise to more or less stable and salient boundaries. Specifically, comparisons between Turkish and Moroccan community contexts highlight the key role of boundary making processes at the micro-level of Muslim families and communities. In support of most stable religious boundaries in community contexts where cultural maintenance and social closure are generally high, we find most effective religious transmission from immigrant parents to their children in Turkish (vs. Moroccan) communities in the Netherlands and Belgium. Religious identity is passed on to children through family socialisation, as evident from the long-term impact of parental role models of religious practice in childhood, as well as through community-based religious teaching. In support of cultural maintenance as a key boundary making process within ethnic communities, religious socialisation is part and parcel of the maintenance of the heritage culture and identity. Across the communities, Muslims who were more oriented towards cultural maintenance were also more involved in religion later in life. Finally, our last study provides evidence of religious boundary making through social closure in co-ethnic networks with fellow Muslims. Thus, Muslims with more co-ethnic ties not only reported higher levels of religious identification but also more behavioural involvement in the religious domain. Again, co-ethnic ties best predicted religious practice in most densely networked Turkish communities.

To conclude, we should acknowledge some limitations of the present studies, as large-scale surveys cannot fully capture the situated meanings of religious identities. Moreover, cross-sectional data are ill-suited to reveal the dynamic and changing nature of religious identities. In spite of clear limitations, however, the studies jointly illustrate the importance of theory-informed comparative migration research. Strategic comparisons allow us to challenge common sense notions of Islam as an inherently strong religion which is incompatible with European cultures. Instead, our comparative findings foreground different cities and communities as local integration contexts which can make and unmake religious group boundaries.

Acknowledgements

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About the authors

Karen Phalet, University of Leuven, Belgium.
E-mail: Karen.Phalet@ppw.kuleuven.be. Corresponding author.

Mieke Maliepaard, Utrecht University, Netherlands.
E-mail: Karen.Phalet@ppw.kuleuven.be

Fenella Fleischmann, Utrecht University, Netherlands.
E-mail: F.Fleischmann@uu.nl

Derya Güngör, University of Leuven, Belgium.
E-mail: Derya.Gungor@ppw.kuleuven.be

The Effects of Islam, Religiosity, and Socialization on Muslim-Canadian Opinions about Same-Sex Marriage

Christopher Cochrane

Abstract

Critics of Islam often frame anti-Islamic positions as a defense of tolerance against intolerance, and of equality against inequality. Islam, for this perspective, poses challenges for the ideological integration of Muslim immigrants in Western societies. This paper examines Canadian Muslims' opinions about same-sex marriage. The analysis suggests that Canadian Muslims, as a group, do have distinctively negative opinions about same-sex marriage, but that there is substantial and systematic variation in opinions about this issue within the Muslim-Canadian community. Indeed, it is religiosity in general, rather than Islam in particular, that generates negative opinions about gay marriage. Exposure to the Canadian context, and especially postsecondary education, largely undoes the distinctiveness of Canadian Muslims' opinions about this issue.

Keywords: Islam, Muslims, Immigration, Public Opinion, Same-Sex Marriage

1.   Introduction

In January 2007, the town of Hérouxville, Québec, Canada drafted a series of resolutions aimed at prospective immigrants. The most controversial resolution prohibited the stoning of women in public. "Nous considérons que les hommes et les femmes sont égaux et ont la même valeur," the document proclaims, reaffirming the community's basic commitment to the fundamental rights of women, including their right to walk unaccompanied in public, attend school, and operate a vehicle (Municipalité de Hérouxville, 2010). The anti-Muslim sentiment that inspired these resolutions was

certainly unusual in its candor (Bouchard and Taylor, 2008). But it was not unusual in its form. Critics of Islam in Canada and across the Western world often frame anti-Islamic positions as a defense of tolerance against intolerance, and of equality against inequality (Akkerman, 2005, 2010; Betz and Meret, 2009; Ehrkamp, 2010; Mepschen, Duyvendak and Tonkens, 2010; Razak, 2008; Shachar, 2000). Acceptance of sexual diversity in particular, which is a very recent phenomenon in Western countries, is a core tenet of a new "cultural citizenship" in democratic societies that is often invoked against Muslims and against Islam (Mepschen, Duyvendak and Tonkens, 2010; see also Fassin, 2010).

Most of the research on Muslim immigration is focused on the European context, where levels of Muslim immigration, and the political backlash against it, are far more extensive than in the Canadian case (Adida, Laitin and Valfort, 2010; Bleich, 2003, 2009; Bevelander and Otterbeck, 2010; Connor, 2010; Ehrkamp, 2010; Fekete, 2008; Fetzer and Soper, 2003; Scheepers, Gijsberts and Coenders, 2002; Semyonov, Raijman and Gorodzeisky, 2006; Shadid, 1991; Sniderman et al., 2000; Strabac and Listhaug, 2008; Zolberg and Litt Woon, 1999). Debates about Muslim immigration, however, are increasingly important to Canada. The size of the Canadian Muslim population more than doubled between the 1991 and 2001 censuses, and this growth has continued apace. Worldwide population and migration patterns mean that Muslims will comprise an increasing share of immigrants to Canada for the next several years. By 2030, the number of Muslims in Canada is estimated to triple, from 940 thousand to 2.7 million, or 6.6 percent of the national population (Pew Research Center, 2011).

Canada has the second highest per-capita immigration rate in the OECD, and the proportion of foreign-born (and non-British) citizens has never fallen below 13 percent in the country's 144 year history (Chui, Tran and Maheux, 2007). Indeed, multiculturalism is so entrenched in Canada that many consider it a signature characteristic of the country's political culture (Eliadis, 2007). In the 2006 World Values Survey, less than 3 percent of Canadians indicated that they did not want "people of a different race" as neighbors; less than 2.5 percent said the same thing about "immigrants," and fewer still said the same about "people of a different religion" (European Values Study Group and World Values Survey Association, 2010). Even so, Muslim immigrants in particular are often singled out for the supposed incompatibility of Islam with core liberal values, especially regarding homosexuality and the rights of women (Razak, 2008). These arguments appear to be resonating in Canadian public opinion. More than two thirds of Canadians perceive an "irreconcilable" conflict between Islamic and

Western societies (Leger Marketing Research, 2011), and, in the World Values Survey, nearly 12 percent of Canadians, and nearly one in four Quebecers, did not want Muslims as neighbors (European Values Study Group and World Values Survey Association, 2010). Indeed, less than half of all Canadians hold a positive perception of Muslims (Jedwab, 2011). In this respect, the Canadian public opinion environment resembles those in many European countries, including the Netherlands (Mepschen, Duyvendak and Tonkens, 2010: 965).

This paper examines the level and drivers of Canadian Muslims' opinions about the legal recognition of same-sex relationships. The recognition of same-sex marriage by the Parliament of Canada in 2005 is among the signature liberal achievements in Canadian politics in the past half-Century. This achievement did not happen all of a sudden. It was the culmination of a decades-long pattern of political activism and social movement politics, as well a series of legal, political and public opinion shifts regarding gays and lesbians. In the 1982 World Values Survey, a majority of Canadians, 51 percent, expressed the view that homosexuality was "never justifiable;" that figure fell to 37 percent in 1990, 26 percent in 2000, and 20 percent in 2006. Nowadays, a majority of Canadians (61%) support same-sex marriage, and an overwhelming majority (85%) support at least some form of legal recognition for same-sex couples (Ipsos, 2011). Nonetheless, the recognition of same-sex marriage rights was staunchly opposed by the leaders of major religious groups in Canada–including Catholic, Muslim, Jewish and other leaders–and this opposition remains a legitimate conservative position in Canadian political discourse. In this respect, opinions about same-sex relationships are a high bar to use in assessing the extent to which people's opinions are "compatible" with a liberal cultural environment.

Drawing an analytical boundary around the category "Muslim" risks privileging from the outset explanations that draw attention to the lone characteristic that all Muslims, by definition, share in common: Islam. As a group, however, Muslims are distinctive from other Canadians, and indeed from other immigrants and religious groups, in more than simply their religious convictions. There are different "proportionalities" of people with certain characteristics inside of the category "Muslim" than there are outside of this category. The core finding of this paper is that the treatment of Muslims as a monolithic social group masks variations within the Muslim community in terms of characteristics that are associated in systematic ways, for Muslims and non-Muslims alike, with public opinion about liberal political issues, and, in particular, with opinions about same-sex marriage.

The remainder of the paper is divided into four sections. The next section examines the characteristics and opinions of Canada's Muslim community. This analysis suggests that Muslim-Canadians do indeed stand out as a group for their negative opinions about same-sex relationships, but that the explanation for this distinctiveness is unclear. The third section proposes and tests two plausible explanations for the distinctiveness of Muslims, and summarizes data that allow for tests of these hypotheses. The "religiosity hypothesis" attributes conservatism among Muslims to Islam, whereas the "foreign socialization hypothesis" suggests that many Muslims bring with them the conservatism of the countries from which they emigrated. These hypotheses are not mutually exclusive, but they do generate different implications. The fourth section tests these implications systematically. This part of the analysis draws on a large web-based public opinion survey of Canadian voters. Section five, the conclusion, discusses the implications of the results for the framing of the debate surrounding Muslim immigration. The core findings are, first, that it is religiosity in general, and not Islam in particular, that generates opposition to same same-sex marriage; and second, that a Canadian socialization, and not simply secularization, undoes these opinions. There appears to be nothing about a commitment to Islam in particular that generates or preserves, more than other religions, opposition to same-sex relationships.

2. Profile of Canadian Muslims

The overwhelming majority of Muslim-Canadians are foreign-born. The top left-hand panel in Figure 1 highlights the relative proportions of major religious groups that were born in Canada and abroad (Statistics Canada, 2001). The remainder of the panels summarize, for the immigrants within each religious group, their distributions in terms of their region of birth and length of residence in the country. Canadian Muslims are overwhelmingly recent immigrants. At the time of the Census, 72 percent of Muslims were foreign-born, compared to just over 18 percent of the Canadian population as a whole. Two-thirds of Muslim immigrants had arrived to Canada within 10 years of the census, and more than 40 percent had arrived within five years. The comparable figures for immigrants as a whole were 34 and 18 percent, respectively. Canadian Muslims also tend to immigrate from specific regions of the world. Fully 90 percent of Muslim immigrants to Canada arrive from the Middle East (35%), South Asia (27%), and Africa (25%), and just six percent arrive from Europe and East Asia. By contrast,

fewer than one in six non-Muslim immigrants arrive from Africa, the Middle East, and South Asia, and the majority of immigrants to Canada are from European (40%) and Eastern Asian (13%) countries. Muslims therefore differ from most other religious groups in that they are overwhelmingly immigrants, and they differ from most other immigrant groups in that they are overwhelmingly recent immigrants and from South Asia, the Middle East and Africa.
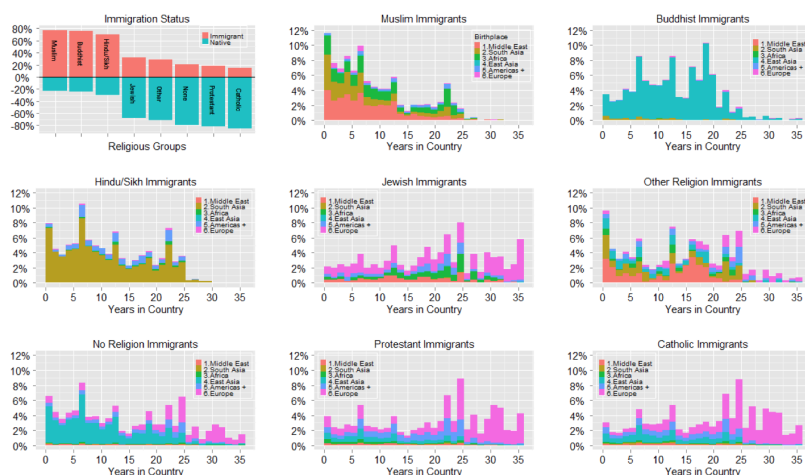

Figure 1: Immigration Status of Major Religious Groups in Canada.
Source: Statistics Canada, 2001 Census of Canada.

Figure 2 summarizes in a broad cross-national perspective public opinion about homosexuality. The y-axis corresponds to the national average of respondent positions in the two most recent waves of the World Values Survey (1999-2006) on a question which asks them to situate their views about homosexuality from a low of 1 ("is never justifiable") to a high of 10 ("is always justifiable"). The x-axis summarizes the country's score on the UN Human Development Index (United Nations Human Development Programme, 2011). The colors and shape of the points correspond to different regions of the world, and the size of the points reflects the size of the Muslim population in each country. The LOESS smoother summarizes the relationship between level of HDI and public opinion about homosexuality.
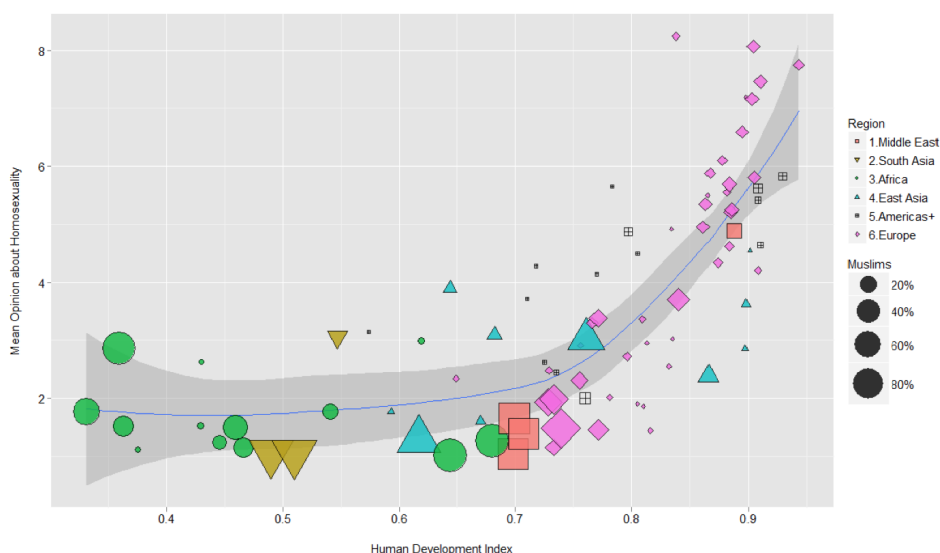
Figure 2: Public Opinion about Homosexuality in Comparative Perspective.
Sources: World Values Survey, 1996-2006; Human Development Index, 2011; Pew Research Center, 2010.

Two findings emerge from Figure 2. First, as Inglehart and Norris (2003) find, public opinion in Muslim majority countries is invariably negative toward homosexuality. The larger points are clustered toward the low end of the y-axis. Fully 99 percent of Jordanians and Bangladeshis responded that homosexuality was "never" justifiable, as did 96 percent of Pakistanis, 93 percent of Algerians, 91 percent of Indonesians, 88 percent of Iranians, and 79 percent of Turks. The comparable figures among non-Muslim countries are not in the general vicinity of these levels. Indeed, using the percentage of a country's Muslim population to predict public hostility toward homosexuality accounts for about a fifth of the variation of the points in the figure.

Yet, second, opinions about homosexuality are powerfully related to a country's score on the UNDP's Human Development Index. Certainly, this basic finding is consistent with existing accounts of value change in postindustrial societies (Inglehart, 1997). But it also raises questions about the extent to which the prevalence of Islam rather than level of socioeconomic development accounts for the distinctiveness of Muslim countries. Indeed, opinion in Muslim majority countries is hardly more hostile toward homosexuality than is opinion in other countries at comparable levels of HDI, or in the same regions of the world. Public opinion in African countries, for example, is unanimously negative about homosexuality, regardless of

the proportion of the Muslims in the country. 96 percent of Zimbabweans and 90 percent of Ugandans–both countries with small Muslim populations–indicated that homosexuality was never justifiable. From this vantage point, notice that the position of Muslim majority countries in Figure 2 is not much lower–and is in some cases higher–than the line which depicts the relationship between HDI and opposition to homosexuality. Taking into account the level and non-linear effect of HDI reduces by two-thirds the magnitude of the relationship between the proportion of Muslims in a country and the country's average level of opposition to homosexuality. This relation-ship is only barely significant statistically (t = -2.2). In short, Muslim countries do not appear to stand out, or at least not by much, from other countries at similar levels of socioeconomic development.

Taken together, there are strong reasons for supposing that Muslim-Canadians will tend to express a negative opinion toward same-sex marriage. Most Muslim-Canadians are recent immigrants from areas of the world where there is virtually unanimous opposition to homosexuality. Indeed, the prevalence of liberal attitudes toward homosexuality is a rather recent phenomenon in Canada, and if not for drastic changes in Canadian public opinion during the 1980s–which very few Muslims were in the country to experience–the level of support for gay rights in Canada would resemble nothing like it does today.

3.   Public Opinion about Same-Sex Marriage

This part of the analysis draws on two large public opinion polls of the Canadian electorate taken immediately after the 2006 and 2011 federal elections (Ipsos, 2006, 2011). These surveys are, for present purposes, two "opt-ins" away from randomization. Respondents opt-in first, in effect, to the election, and they opt in second to the survey. Relative to their shares of the Canadian population, men and immigrants are under-represented in these surveys. Men comprise 38 percent of the sample and 49 percent of the Canadian population. Immigrants make up 21 percent of the population, but just 11 percent of the sample. Older people are overrepresented. The mean age of survey respondents is 53, compared to a mean age of 37 in the Canadian population as a whole, and 46 among the voting-age population. These differences are due in part to the facts that these are surveys of the electorate and because they are opt-in web surveys (Chang and Krosnick, 2009).

An important advantage of these data, however, is that the sample sizes are very large. The 2006 survey has 36 003 respondents, including 160 Muslims. The 2011 survey has 39 261 respondents, including 250 Muslims. Surveys of this size permit reliable statistical analyses of minority subgroups, such as Muslims, that are statistically invisible in other surveys. Moreover, both surveys ask respondents for their opinions about same-sex marriage. These question wordings, outlined in Table 1, are not identical, but they are sufficiently similar to permit a pooling of the data on these questions, and thus a further increase of the sample size of minority sub-populations. Indeed, the answers of respondents to these questions are very similar at both time-points. In 2006, 53 percent of respondents supported same-sex marriage, compared to 35 percent that supported civil unions, and a further 13 percent that supported neither of these. In 2011, 61 percent supported same-sex marriage, 25 percent civil unions, and 14 percent were opposed to any form of recognition.

Table 1.   Survey Items on Same-Sex Marriage.

Year	Question Wording	Options
2006	Which comes closes to your views about gay and lesbian couples, do you think:	1. They should be allowed to legally marry; 2. They should be allowed to legally form civil unions, but not marry; 3. There should be no legal recognition of their relationships
2011	What is your view on same-sex marriage?	1. Favour same-sex marriage; 2. Oppose same-sex marriage, but would accept same-sex civil unions; 3. Oppose entirely same-sex marriage

Source: Ipsos, Election Exit Poll, 2006/2011.

Figure 3 outlines how respondents from different religious groups answered these questions about same-sex marriage. The lighter bars on the left side of the figure correspond to the proportion of each group that supports full-fledged marriage rights for gays and lesbians, and the darker bars on the right correspond to the proportion that opposes to all forms of recognition. The middle bars represent the proportions favoring civil unions.
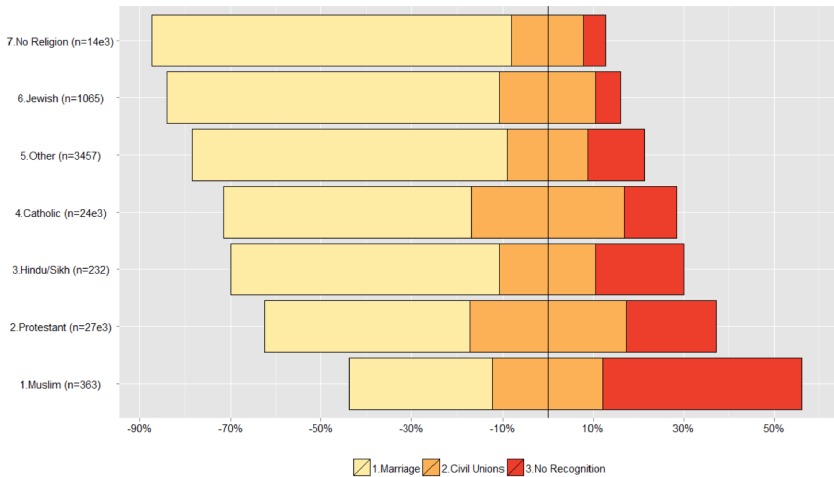
Figure 3: Opposition and support for Same-Sex Relationships.
Source: Ipsos, Election Exit Poll, 2006/2011.

Respondents with no religion expressed the highest levels of support for same-sex marriage. Less than five percent of those with no religion opposed any form of recognition of same-sex relationships, and 78 percent supported same-sex marriage. The comparable figures for the next closest group, Jewish respondents, were 13 and 70 percent, respectively. The results are altogether different, however, among Muslim respondents. Muslims stand out from other religious groups in Canada for their level of opposition to same-sex marriage. Indeed, Muslims are the only group for whom the proportion opposing any form of recognition for same-sex couples, 44 percent, is larger than the proportion, 32 percent, that supports same-sex marriage. Protestants are the next closest group in terms of opposition to gay marriage. Even then, however, there are more than two Protestants that support same-sex marriage for every one Protestant that opposes all forms of recognition (45% vs. 20%). Muslims, in short, are the only one of these religious groups wherein there is a very substantial level of opposition to any form of recognition of same-sex relationships.

4.   Data and Hypotheses

Both surveys include measures for immigration status, frequency of religious observance, and level of formal education. The 2011 survey includes additional questions about length of residence in the country, region of

origin, and a battery of questions about religiosity. The variables and question wordings are summarized in Table 2.

**Table 2.** Variables and Question Wording.

Year	Name	Question Wording	Categories
2006	IMMIGRANT	Were you born in Canada?	1. Immigrant 0. Native
	CHURCHATT	Other than on special occasions...how often did you attend religious services or meetings in the last 12 months?	3. + Once a week 2. Once a week 1. Once a month+ 0. Less often
	EDUCATION	Education Level	6. Graduate degree 5. University degree 4. Some university 3. College diploma 2. Some college 1. High School 0. No High School
2011	IMMIGRANT	Were you born in Canada?	1. Immigrant 0. Native
	YEARSCDA	In what year did you come to Canada?	5. Before 1959 4. 1960-9 3. 1970-9 2. 1980-9 1. 1990-9 0. 2000-11
	BIRTHPLACE	Where specically did you move from?	1. Middle East 2. South Asia 3. Africa 4. East Asia 5. Americas+ 6. Europe
	CHURCHATT	How often do you attend church, temple, mosque services at your place of worship?	Same as 2006
	RELIGIMP	In your life, would you say religion is very important, somewhat important, not very important, or not important at all?	3. Very 2. Somewhat 1. Not very 0. Not at all
	PRAYERS	Do you believe in a God that answers prayers?	1. Yes 0. No
	HOLYBOOK	Do you believe that the holy book of your religion...is the revealed word of God?	1. Yes 0. No
	EDUCATION	Education Level Same as 2006	

The religiosity hypothesis generates two expectations. On the one hand, the distinctiveness of Muslims may be attributable to their higher level of religiosity (Adamczyk and Pitt, 2009; Boswell, 1980; Rimmerman, Wald and Wilcox, 2000). In this case, Muslims are not distinctive because of Islam per se, but because religiosity is associated with heightened opposition to same-sex marriage, and Muslims are more religious than other Canadians. Controlling for level of religiosity should therefore reduce the magnitude of the difference between Muslims and non-Muslims. On the other hand, however, the distinctiveness of Muslims may be attributable to the effects of Islam in particular (Hekma, 2002). In this scenario, religious Muslims stand out from other religious Canadians because a commitment to Islam is associated with more negative opinions about same-sex marriage than is a commitment to other religions, such as Catholicism and Protestantism.

If the foreign socialization hypothesis is correct, then the gap between Muslims and non-Muslims is attributable primarily to the distinctive opinions of Muslims socialized in foreign countries. Formal education may also play a role. The cause of the empirical relationship between formal education and liberal values is a matter of some debate (Abramson and Inglehart, 1994; Dutch and Taylor, 1993; Jennings and Niemi, 1981; Warwick, 1998). Nevertheless, Weil (1985) finds that this relationship is conditional on the prevalence of liberal democracy in a country. Thus, the effects of education may differ for people that receive their education in Canada than for people that receive their education in non-liberal countries. If this is correct, then a high level of formal education may decrease opposition to same-sex marriage among Canadian-born Muslims–who would have received their education in Canada–but not among foreign-born Muslims–who would have received most, if not all, of their formal education in Africa, the Middle East, or South Asia. The muted effects of formal education on the opinions of foreign-born Muslims, moreover, could contribute to the distinctiveness of Muslims as a group in their opinions about same-sex marriage.

The place to begin is with the data. Figure 4 summarizes for each religious group the basic bivariate relationship between level of religious attendance, on the x-axis, and opposition to all forms of legal recognition of same-sex relationships, on the y-axis. The size of the points reflects the proportion of each religious group at each level of religious attendance.
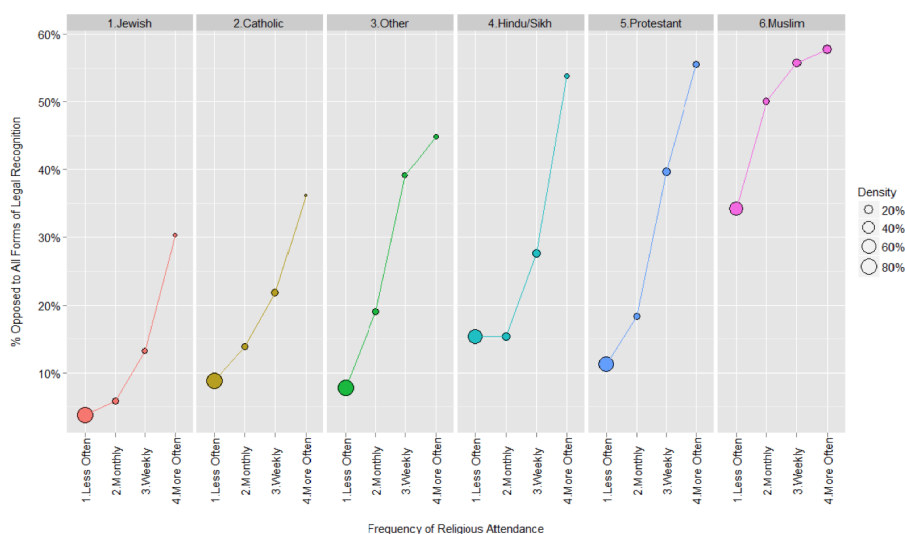
Figure 4: Opposition to Legal Recognition of Same-Sex Relationships, by Religious Attendance.
Sources: Ipsos , 2006 and 2011.

A few findings emerge in Figure 4. First, notice the size of the data points at different levels of church attendance. The vast majority of Jews (80%) Catholics (76%), Protestants (66%), and Other Religions (81%) attend religious ceremonies only infrequently – less than once a month. Only 10 percent of Jews and 15 percent of Catholics attend religious ceremonies on a weekly basis, and less than 3 percent attend religious ceremonies more than once a week. The comparable figures are somewhat higher, but nonetheless quite low, for Protestants (24%, 8%) and Hindu/Sikhs (19%, 5%). For Muslims, however, nearly half (45%) attend a religious ceremony at least once a month, and fully one in five attend more than once a week. In this respect, Muslims are disproportionately represented among the higher levels of religious attendance where opposition to same-sex relationships is especially pronounced.

Notice, however, that the gap between people who rarely and regularly attend religious ceremonies is less pronounced among Muslims than among the members of any other religious group. Indeed, the 24 percentage point difference between Muslims who attend religious ceremonies more than once a week, and the Muslims who attend less than once a month, is dwarfed by the 45 point spread between Protestants in these categories, and the 39 and 37 point spreads among Hindu/Sikhs and Other Religions, respectively.

Notably, the Muslim respondents that stand out the most from the other religious groups are not the Muslim respondents that attend religious ceremonies on a regular basis. With the exception of Catholics and Jews, people who frequently attend religious ceremonies are generally quite negative, at least compared to other Canadians, in their opinions about the legal recognition of same-sex relationships. In this regard, Muslims are not much different. Rather, where Muslims are different is in the level of opposition to same-sex relationships that exists among Muslims who attend religious ceremonies only rarely, if at all. These Muslims oppose at more than three times the rate of the infrequent attenders among other religions the legal recognition of same-sex relationships. There are a few potential explanations for this finding, not least of which is that religious attendance may be a less effective indicator of religious commitment among Muslims than among non-Muslims. Section Four examines this possibility in greater detail.

Figure 5 summarizes for native-born and foreign-born respondents within each religious group the relationship between level of education and opposition to the legal recognition same-sex relationships. The horizontal lines on each panel represent the averages for each sub-group.
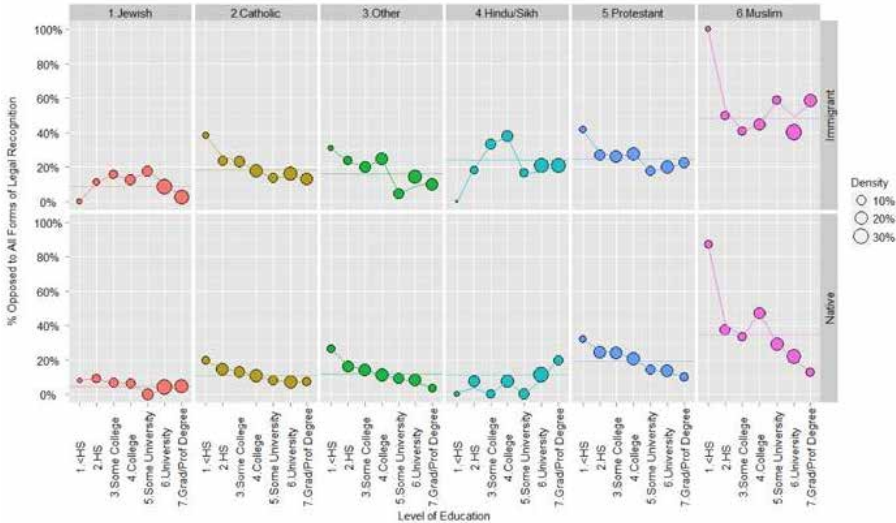

Figure 5: Opposition to Legal Recognition of Same-Sex Relationships, by Level of Education
Sources: Ipsos , 2006 and 2011.

On the whole, 19 percent of foreign-born Canadians oppose any form of recognition of same-sex relationships, compared to 13 percent of native-born Canadians. This basic relationship persists among all religious groups, but it is especially pronounced among Muslims. Nearly half of all foreign-born Muslims, 49 percent, oppose any recognition of same-sex relationships, compared to 34 percent among native-born Muslims.

Level of education is consistently and inversely associated with opposition to same-sex relationships. More highly educated respondents express higher levels of support for same-sex relationships than do their counterparts with lower levels of formal education. Notice in particular the trends among Muslims. Interestingly, the magnitude of the effect of formal education on opinions about same-sex marriage is by a considerable extent largest among native-born Muslims (Coef = -.366, se = .119); yet, the effect is altogether non-existent among foreign born Muslims (Coef = -.023, se = .08). Foreign-born Muslims are just as likely to oppose same-sex relationships, regardless of their level of education. And while native-born Muslims with a university degree harbor opinions that are virtually indistinguishable from the opinions of all other Canadians with a university degree, the opinions of native-born Muslims with less than postsecondary education are indistinguishable from the opinions of foreign-born Muslims.

5.   Multivariate Analysis

This stage of the analysis is confined to the 39 261 respondents in the 2011 survey, which contains more precise measures of religiosity, country of birth, and length of exposure to the country. The indicators of religiosity, summarized in Table 2, are church attendance, importance of religion, whether the Holy Book is the revealed word of God, and whether God answers prayers. Interestingly, church attendance is the weakest loading variable on this factor for all religions; it is especially weak among Muslims, and doubly weak among Muslim women. This suggests that religious attendance is a less effective indicator of underlying religiosity among Muslims than among other religious groups, and it may explain the findings, uncovered above, that Muslims stand out in their opinions among gay marriage more strongly among non-Mosque-attenders than among regular Mosque-attenders. Even so, the remaining three items–HOLYBOOK, GODPRAYERS, and RELIGIMP–constitute a highly reliable and single dimensional measure of religiosity that applies equally to all of the religious groups. After standardizing these variables with a mean of 0 and standard

deviation of 1, they haven been weighted by their factor loadings and added together to form a three item index of religiosity (α = .84), which has itself been standardized, for ease of interpretation, with a standard deviation of 1 and a minimum value of 0.

5.1.   Drivers of Opinions about Same-Sex Marriage

The dependent variable is comprised of three categories. Support for same-sex marriage is the first category (1), support for civil unions is the second category (2), and opposition to all forms of recognition is the third category (3).These categories are not perfectly ordinal. The parallel regression assumption is violated. Even so, closer analysis indicates that these differences are questions of magnitude rather than of direction. Some variables do somewhat more heavy lifting in predicting the distinction between the first and second categories than between the second and third, and some variables do more between the second and third than between the first and the second. The variables that predict opinions between the first and the second categories, however, also predict, in the same direction and to approximately the same extent, opinions between the second to the third. The violation of the parallel regression assumption is therefore not so severe to warrant transforming the dependent variable into two categories, or of employing less parsimonious regression models suited to nominal dependent variables. Missing data are not a problem for this stage of the analysis. The survey required respondents to provide answers about most sociodemographic information–including gender, education, immigration status, and country of birth. Even so, the survey did provide opportunities for respondents to not answer some questions. Only 507 observations, however, or one percent of the sample, are missing on religion, and fewer still, 233, are missing on religiosity. In effect, the covariates in the model are complete. Where there is missing data is on the question of same-sex marriage, where 2773 observations, or seven percent of the sample, are missing. Given that the covariates are complete, however, using these variables to impute values of the dependent variable can add no additional information, at least to the extent that the pattern of missing values on the dependent variable is random (Little, 1992). To the extent that these patterns are not random, moreover, multiple imputation does not solve the problem. Further analysis indicates that the patterns of missing data on same-sex marriage are largely random. Using the full battery of independent variables to predict missing observations on the question of same-sex marriage adds just a tenth of a percentage point to predictive accuracy of the naive prediction that no cases are missing.

5.2   Religiosity Hypothesis

Table 3 outlines in three stages the results of an Ordinal Logistic Regression model that uses religion and religiosity to predict respondent positions on same-sex marriage. The first bloc of the model assesses the impact of respondent religion, controlling for age and gender. The second bloc controls for level of religiosity, and the third bloc, an interaction model, controls for possible differences in the effect of religiosity across religious groups. All of the models include age and gender because these variables are related simultaneously with level of religiosity and with opinions about same-sex marriage. In all of the models, the largest religious group, Catholic, is the reference category. Thus, the coefficients for the different religious groups reflect a comparison to Catholics. Moreover, the use of interaction terms in the third model means that it is not possible to compare directly in this model the direct effects of religion and religiosity, given that their values are conditional in the interaction model on the values of the other variables with which they interact.

Table 3.   Religion, Religiosity and Opinions about Same-Sex Marriage.

	Bloc 1	Bloc 2	Bloc 3
Age	0.023*	0.020*	0.021*
	(0.001)	(0.001)	(0.001)
Male	0.582*	0.796*	0.796*
	(0.022)	(0.023)	(0.023)
Protestant	0.353*	0.282*	-0.388*
	(0.025)	(0.025)	(0.063)
Muslim	1.753*	1.367*	0.188
	(0.140)	(0.142)	(0.503)
Jewish	-0.902*	-0.666*	-0.724*
	(0.101)	(0.105)	(0.200)
Hindu/Sikh	0.135	0.092	-1.217*
	(0.181)	(0.187)	(0.576)
Other	-0.358*	-0.129*	-1.259*
	(0.061)	(0.063)	(0.156)
None	-1.046*	-0.006	-0.265*
	(0.035)	(0.040)	(0.056)
Religiosity		0.832*	0.639*
		(0.015)	(0.023)
Protestant.Religiosity			0.366*
			(0.032)
Muslim.Religiosity			0.587*
			(0.221)

	Bloc 1	Bloc 2	Bloc 3
Jewish.Religiosity			0.003
			(0.116)
Hindu/Sikh.Religiosity			0.728*
			(0.287)
Other.Religiosity			0.684*
			(0.083)
None.Religiosity			0.014
			(0.050)
cut1	1.884*	3.186*	2.888*
_cons	(0.049)	(0.057)	(0.063)
cut2	3.351*	4.778*	4.490*
_cons	(0.052)	(0.061)	(0.065)
N	35948	35948	35948
pseudo R^2	0.064	0.118	0.121

Standard errors in parentheses. $*p < 0.05$

Source: Ipsos 2011.

Given the results of the earlier analysis, it is not surprising that Muslims stand out in the first bloc of the model. Compared to the sample as a whole, and holding gender and age constant at their mean level, the predicted probabilities indicate that Muslims are three times less likely to support same-sex marriage (21% vs. 63%) and nearly four times more likely to oppose all forms of recognition for same-sex relationships (47% vs. 12%). The 95 percent confidence intervals are in the vicinity of plus or minus five percentage for Muslims and plus or minus a half a percentage point for the sample as a whole. For the next most conservative group, Protestants, 52 percent support same-sex marriage, and only 18 percent oppose all forms of recognition. Protestants are significantly less conservative than Muslims, but significantly more conservative than Jews, for example. Fully 79 percent of Jews support same-sex marriage rights, and just five percent oppose all forms of recognition.

Introducing level of religiosity, in Bloc 2, substantially improves the fit of the model. Muslim Canadians are more religious than non-Muslims. On the religiosity scale, which ranges from a low of 0 to a high of 2.6, the mean score for Muslims is 2.1 (sd = 0.7), which is more than a third of a standard deviation higher than the next closest group, Protestants (1.8, sd=.9), and more than two thirds of standard deviation higher than the national average (1.4, sd=1). This contributes to the distinctive opinions of

Muslims. According to these estimates, if Muslims were no more religious than other Canadians, then 33 rather than 21 percent of Muslims would support same-sex marriage, and only 29 rather than 47 percent would oppose all forms of recognition. On its own, religiosity accounts for about 36 percent of the opinion gap between Muslims and non-Muslims in Canada.

This evidence supports one part of the religiosity hypothesis. It turns out that the higher level of religiosity among Muslims accounts for a sizeable portion of their distinctive positions about same-sex marriage. What is not clear, however, is whether Islamic religiosity generates to a greater extent than other kinds of religiosity opposition to same-sex marriage. This is the key assumption underlying arguments that single out Islam as a set of religious beliefs that generates illiberal opinions about gay rights.

The evidence in Bloc 3 provides limited support for this line of argument. This bloc of the model includes interaction terms for religiosity by religion. Bloc 3 improves the fit of the model, even taking account of the additional number of variables, but only marginally (LR $\chi2$ = 200). Nonetheless, a number of relevant findings emerge from this bloc of the model. The baseline category is Catholics. Given that these are interaction terms, the religiosity variable now represents the effect of religiosity for Catholics; the Religion variables now represent the direction and magnitude of the difference between each religious group and Catholics when the level of religiosity is at its lowest possible value; and in order to calculate the total effect of religiosity for each religious group, one must add the coefficient for Religiosity to the coefficient of the interaction term for that particular group.

Notice that Muslims continue to stand out from the other groups–though not so much from Catholics–even when the level of religiosity is at its lowest possible value. Protestants, Jews, Hindus and Sikhs, members of other religions and members of no religion are all more liberal than Catholics when level of religiosity is at its lowest possible value. Muslims, however, are not more liberal. Even so, notice as well that although the effect of religiosity is larger among Muslims than among Catholics, it is not larger among Muslims than it is among Hindus/Sikhs and members of Other Religions; indeed, the effect is not larger at statistically significant levels among Muslims than among Protestants.

Figure 6 summarizes the key results of the regression model. The horizontal lines in Figure 6 correspond to the the average levels of support and opposition to same-sex marriage in the entire sample. The bars in the Figure represent the predicted levels of support and opposition to same-sex marriage among Muslims, but under different scenarios about the level and impact of Islamic religiosity. These scenarios are summarized along the

x-axis. The leftmost scenario is the predicted level of support and opposition to same-sex marriage among Muslims under the assumption that both the level and effect of religiosity among Muslims are constant at their observed levels among Muslims, controlling for age and gender. The second scenario reflects the same prediction, and also holds the level of religiosity constant at its observed level among Muslims, but in this case it adjusts the effect of religiosity to its average level among all Canadians, rather than to its observed level among Muslims. And finally, the third scenario holds the effect of religiosity constant at its observed level among Muslims, but adjusts the level of religiosity to its average level in the sample as a whole. Figure 6 therefore makes it possible to compare the distinctive contributions of both the level and effect of Islamic religiosity on the size of the opinion gap between Muslim and non-Muslim Canadians.
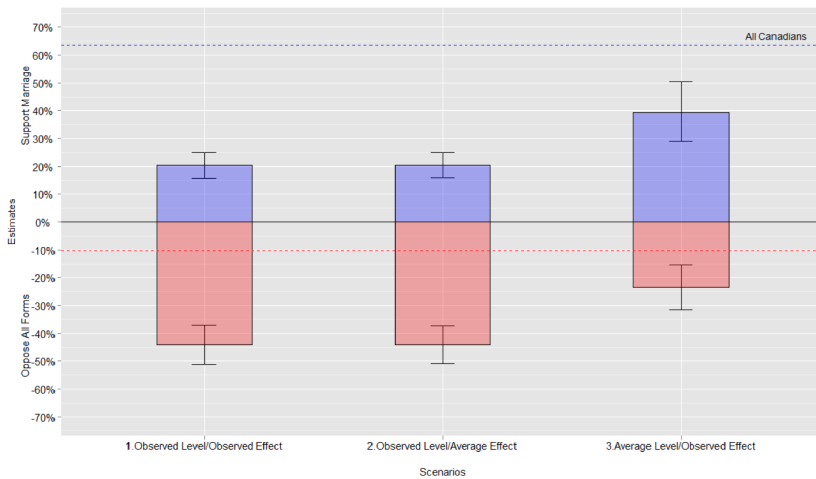
Figure 6: Muslim Opinions about Same-Sex Relationships, by Level and Effect of Religiosity.
Sources: Ipsos , 2006 and 2011.

The main finding is that it is in large part the higher level of religiosity among Muslims, and not at all the effect of Islamic religiosity in particular, that explains the opinion gap on same sex marriage between Muslims and non-Muslims in Canada. Notably, controlling for the effect of Islamic religiosity does not reduce the size of the opinion gap between Muslims and non-Muslims. Muslims are just as different from the national averages in the second scenario, when the effect of Islamic religiosity is assumed to be identical to the effect of religiosity among all Canadians, as in the first

scenario, when the effect of religiosity is set to the value observed among Muslims. The size of the opinion gap decreases substantially, however, when the greater level of religiosity among Muslims is taken into account.

5.3. Foreign Socialization Hypothesis

There are a few ways in which foreign socialization may influence opinions about same-sex marriage. First, it may influence these opinions directly. Recent immigrants to Canada who were born and socialized in regions of the world where there is widespread opposition to homosexuality may harbor negative opinions about same-sex marriage by virtue of their high levels of exposure to the opinion environments in their countries of origin, and their low levels of exposure to the opinion environment in Canada. Second, however, foreign socialization may also affect opinions indirectly, through religiosity. If immigrants happen to be more religious than native-born Canadians, then they may stand out for their opinions about gay marriage in part by virtue of their higher levels of religiosity. This would be an indirect effect of foreign socialization, and it suggests that controlling for religiosity would mitigate to some extent the effect of foreign birth and socialization on public opinion about gay marriage.

Closer analysis, however, rules out this second possibility. Immigrants are indeed more likely than native-born Canadians to attend religious services, but, intriguingly, they do not score higher than native-born Canadians on the three-item measure of religiosity (1.4 for native born vs. 1.4 for immigrants). This non-finding applies equally to Muslims (2.1 for native born vs. 2.2 for foreign born). Moreover, the effect of religiosity on opinions about same-sex marriage is equally as strong for native-born as it is for immigrant-Canadians–indeed, if anything, the effects of religiosity are slightly stronger among the native-born than among immigrants. The pattern also applies for Muslims. In short, whatever impact foreign socialization has on opinions about same-sex marriage, these effects operate independently of the level and effects of religiosity.

Table 4 replicates the analysis from Table 3, except in this case the variables in the third bloc of the regression model in Table 3–which examined differences in the effects of religiosity across religious groups, and found that these differences had no impact on the distinctiveness of Muslims–are replaced by a different set of variables which measure the region of the world from which the respondents emigrated. The six regional categories are Middle East, South Asia, Africa, East Asia, Americas+, and Europe. Native-born respondents are the reference category.

Table 4. **Religion and Region of Origin as Predictors of Opinions about Same-Sex Marriage.**

	Bloc 1	Bloc 2	Bloc 3
Age	0.023*	0.020*	0.020*
	(0.001)	(0.001)	(0.001)
Male	0.582*	0.796*	0.787*
	(0.022)	(0.023)	(0.024)
Protestant	0.353*	0.282*	0.263*
	(0.025)	(0.025)	(0.025)
Muslim	1.753*	1.367*	0.818*
	(0.140)	(0.142)	(0.155)
Jewish	-0.902*	-0.666*	-0.757*
	(0.101)	(0.105)	(0.106)
Hindu/Sikh	0.135	0.092	-0.491*
	(0.181)	(0.187)	(0.199)
Other Religion	-0.358*	-0.129*	-0.199*
	(0.061)	(0.063)	(0.063)
No Religion	-1.046*	-0.006	-0.050*
	(0.035)	(0.040)	(0.041)
Religiosity		0.829*	0.827*
		(0.015)	(0.015)
Middle East			0.960*
			(0.185)
South Asia			1.142*
			(0.198)
Africa			0.835*
			(0.168)
East Asia			1.210*
			(0.105)
Americas +			0.326*
			(0.074)
Europe			0.477*
			(0.041)
cut1	1.884*	3.186*	3.207*
_cons	(0.049)	(0.057)	(0.058)
cut2	3.351*	4.778*	4.812*
_cons	(0.052)	(0.061)	(0.061)
N	35948	35948	35948
pseudo R^2	0.064	0.118	0.123

Standard errors in parentheses.

* $p < 0.05$

Source: Ipsos 2011.

The introduction of country of birth variables improves somewhat the fit of the model (LR χ^2 = 325). More important for present purposes, however, are three results. First, immigrants, no matter their region of origin, are less supportive of gay rights than are native-born Canadians. All else equal, 65 percent of native-born Canadians support same-sex marriage and just under 10 percent oppose all forms of recognition. For immigrants, the comparable figures are 52 percent and 16 percent, respectively.

Second, however, region of origin plays a significant role in this equation. Immigrants from the Middle East, South Asia, Africa, and East Asia are substantially more likely to oppose same-sex marriage rights than are immigrants from American and European countries. Holding all other variables constant at their mean level, 54 percent of immigrants from European countries support same-sex marriage, but only 42 percent of immigrants from the Middle East and 37 percent of immigrants from South Asia express this view.

Third, and most important, notice by following the coefficient for Muslims across all three blocs of the model that controlling for region of origin reduces the distinctiveness of opinions among Muslims. It reduces the size of the gap between Muslims and non-Muslims by about 10 percentage points, even allowing for the higher levels of religiosity among Muslims. Country of origin closes fully a quarter of the gap between Muslims and other Canadians in support for same-sex marriage, and a third of the gap in opposition to all forms of recognition. Controlling simultaneously for religiosity does even more to reduce this gap. If Muslims were as religious as other Canadians, and if they tended to be born from the same regions of the world, then these estimate suggest that the distinctiveness of their opinions about same-sex marriage would be reduced from a 43 point spread to an 18 point spread in the case of support for same-sex marriage, and from a 34 point spread to a 9 point spread in the case of opposition to all forms of recognition. Accounting for level of religiosity and country of origin reduces by nearly 60 percent the overall differences between Muslims and non-Muslims across all three categories of opinion about same-sex marriage.

Muslims differ from other Canadians, however, not only in their immigration status and country of origin, but also in the recency of their arrival to Canada. Table 5 examines the impact among immigrants of exposure to the Canadian context. The first bloc of the model includes covariates for length of residence in Canada and for length of residence squared. In this model, the coefficients for region of origin represent the effects of each region, compared to native-born respondents, when length of exposure to the country is at its lowest possible value (0), which corresponds to immigrants

that have been in the country for less than ten years. The coefficient for
Years in Canada, as well as Years in Canada squared, capture the effect
of exposure for each additional decade of an immigrant's residence in
the country, on the approximately accurate assumption that the effect is
constant across all categories of immigrants, regardless of their religion or
region of origin.

Table 5. Length of Residence in Canada as a Predictor of Opinions about Same- Sex
Relationships.

	Bloc 1		Bloc 2	
Gay Marriage				
Age	0.022*	(0.001)	0.020*	(0.001)
Male	0.785*	(0.024)	0.820*	(0.024)
Protestant	0.265*	(0.025)	0.279*	(0.026)
Muslim	0.716*	(0.156)	2.481*	(0.581)
Jewish	-0.752*	(0.106)	-0.641*	(0.107)
Hindu/Sikh	-0.596*	(0.201)	-0.612*	(0.203)
Other Religion	-0.204*	(0.063)	-0.211*	(0.064)
No Religion	-0.048	(0.041)	-0.049	(0.041)
Religiosity	0.826*	(0.015)	0.815*	(0.015)
MiddleEast	1.497*	(0.194)	1.822*	(0.214)
SouthAsia	1.653*	(0.207)	1.995*	(0.227)
Africa	1.430*	(0.182)	1.762*	(0.205)
EastAsia	1.810*	(0.127)	2.092*	(0.158)
Americas	1.081*	(0.111)	1.303*	(0.140)
Europe	1.357*	(0.101)	1.522*	(0.128)
Years in Canada	-0.436*	(0.064)	-0.458*	(0.064)
Years in Canada ^{2}	0.045*	(0.010)	0.046*	(0.010)
Education			-0.126*	(0.007)
Muslim.Immigrant			-2.191*	(0.791)
Muslim.Education			-0.275	(0.146)
Immigrant.Education			-0.013	(0.020)
Muslim.Immigrant.Education			0.285	(0.187)
cut1				
_cons	3.297*	(0.059)	2.828*	(0.065)
cut2				
_cons	4.905*	(0.061)	4.449*	(0.067)

	Bloc 1	Bloc 2
N	35948	35948
pseudo R²	0.124	0.130

Standard errors in parentheses.

*p < 0.05

Source: Ipsos 2011.

Figure 7 summarizes the impact of length of residence in Canada on immigrants' opinions about same-sex relationships. The x-axis corresponds to length of residence in Canada, and the y-axis represents the predicted level of support for same-sex marriage among immigrants, when all other variables in Bloc 1 of the model are held constant at their mean level for immigrants. The size of the points represents the proportion of Muslim immigrants (circles) and all immigrants (squares) at each category of length of residence. The three horizontal lines, beginning from bottom to top, represent the average level of support for same-sex marriage among Muslims, among immigrants, and among the Canadian population as a whole.
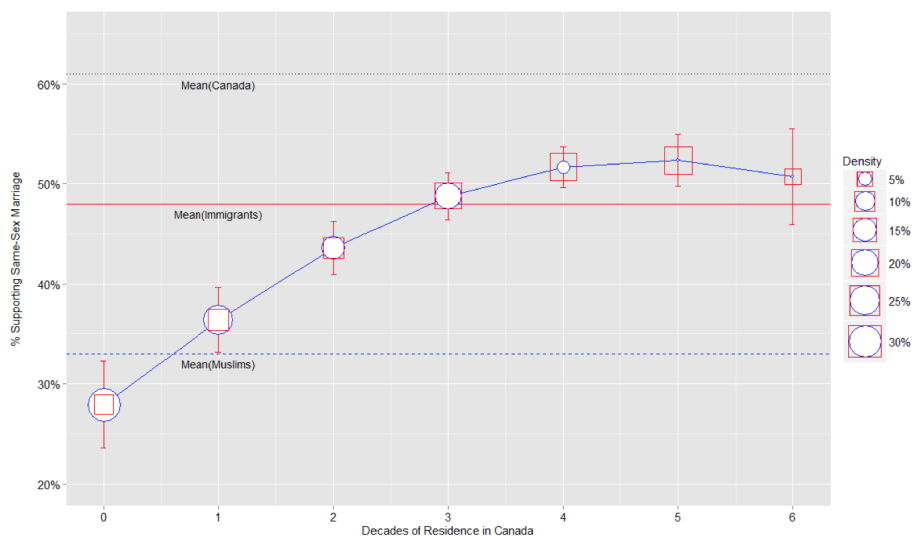
Figure 7: Support for Same-Sex Marriage Among Immigrants, by Length of Residence in Canada.
Source: Ipsos 2011.

Two key findings emerge from this Figure. First, immigrants with high levels of exposure to the Canadian context are more favorably disposed

toward same-sex marriage, and the effect of exposure is non-linear: a one unit increase in level of exposure has its greatest effect at lower levels of exposure, and virtually no effect at higher levels. The effect of each additional year of exposure wanes over time.

Second, notice by looking at the size of the points the uneven distribution of Muslims vis-a-vis other immigrants across categories of exposure. Compared to other immigrants, Muslims are disproportionately concentrated in the lower values of length of residence in Canada, where levels of support for same-sex marriage are very low. They are virtually non-existent in the highest categories of length of residence in Canada, where levels of support for same-sex marriage are considerably higher. Indeed, 60 percent of Muslim immigrants are concentrated in the first two categories of length of exposure, and 95 percent are concentrated in the first four categories. By comparison, just 21 and 51 percent of non-Muslim immigrants are within these categories. This difference contributes somewhat to the higher levels of opposition to same-sex marriage among Muslim immigrants. Controlling for length of residence in Canada by setting the values of this variables constant at its mean level for all immigrants reduces the opinion gap between Muslim and non-Muslim immigrants by about 6 percentage points, even allowing for the higher levels of religiosity among Muslims and their greater likelihood of having arrived from Africa, the Middle East, and South Asia.

Although taking account of appropriate statistical controls reduces the magnitude of the differences between Muslims and non-Muslims, Muslims remain distinctive from other groups of Canadians, even when level of religiosity, region of origin, and length of residence in Canada are all taken into account. It is helpful to figure out which Muslims are driving this difference. Bloc 2 of Table 5 suggests important heterogeneity within the Muslim-Canadian community. This bloc of the model introduces level of education into the equation, as well as a battery of interaction terms that allow for the possibility that the effects of education may vary between native-born and foreign-born Canadians, between Muslims and non-Muslims, and between native-born and foreign-born Muslims.

Figure 8 plots the predicted levels of support and opposition to same-sex relationships for different groups of Canadians at different levels of formal education, when all other variables are held constant at their mean level.[1] The values on the x-axis represent level of education, and the positive and negative values on the y-axis represent the predicted probabilities of supporting same-sex marriage and opposing all forms of recognition, respectively. The white lines represent the predicted levels of support and opposition for Canadians as a whole, and the black lines represent predicted levels for

Muslims. These shaded regions corresponds to the 95 percent confidence intervals of the estimates. The left-hand panel compares across educational categories foreign-born Muslims to Canadians as a whole, and the right-hand panel compares native-born Muslims to Canadians as a whole.
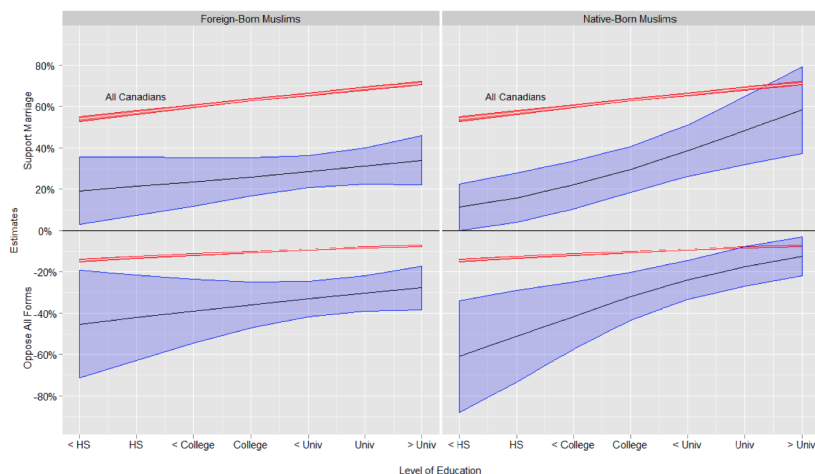
Figure 8: Support for Same-Sex Marriage Among Muslims, by Level of Education.
Sources: Ipsos 2011.

The Figure summarizes two key findings. First, as expected, a higher level of formal education is associated with increased support for same-sex relationships. This pattern applies among all Canadians–including immigrants–and it applies among native-born and foreign-born Muslims. Indeed, the inclusion of education as a predictor of opinions about same-sex relationships generates a notable improvement in the fit of the model.

Second, however, notice that the effect of education on opinions about same-sex marriage is more pronounced among native-born Muslims than among foreign-born Muslims. As level of education increases, the size of the gap between foreign-born Muslims and all Canadians remains unchanged, but it closes quite considerably between native-born Muslims and all Canadians. The difference between native-born and foreign-born Muslims in the rate of change across categories of education is substantively as well as statistically significant.

Intriguingly, these patterns are not the result of different levels of religiosity. There is no empirical relationship among Muslims between level of formal education and level of religiosity. These two variables are altogether unconnected to each other among Muslims (b=.02, p=.599), despite their

rather strong inverse relationship in the population as a whole (b = -.06, p=.000).

6. Conclusion

Canadians Muslims express less support for same-sex relationships than do members of other major religious groups in Canada. But there are reasons to question the extent to which Islam as a religion should be singled out as the cause of these opinions. Public opinion about homosexuality has undergone a drastic transformation in Canada over the past three decades; a transformation that most Muslims, unlike most other Canadians, were not in the country to experience. Indeed, the opinion environments in the regions of the world from which Canadian Muslims tend to emigrate are invariably hostile toward homosexuality, regardless of the proportion of Muslims in those countries.

The results of the analyses uncover some support for the religiosity hypothesis. Religiosity in general is associated with higher levels of opposition to same-sex relationships, and Muslims turn out to be more religious than other Canadians. There appears to be nothing peculiar, however, about Islamic religiosity. There is no evidence in these data that a commitment to Islam generates more negative opinions about same-sex relationships than does a commitment to other, more mainstream religions in Canada, including Protestantism.

The results are similarly mixed for the foreign socialization hypothesis. Certainly, the greater likelihood of foreign-birth among Muslims, combined with their disproportionate representation among immigrants from African, Middle-Eastern and South Asian countries, goes some way toward explaining their distinctive opinions about same-sex marriage. Opinions about same-sex relationships are particularly distinctive among Muslim immigrants, and they are more distinctive among Muslim immigrants that have arrived to Canada relatively recently than they are among the very small number of Muslim immigrants that have been in the country for a number of years. Yet, the story of opinions about same-sex marriage cannot be told without religiosity, and level of religiosity appears to decline very slowly among Muslim immigrants to Canada. Moreover, the Canadian Muslims that stand out the most for their opinions about same-sex relationships are native-born Muslims with low levels of formal education. To what extent the effect of education is a product of self-selection or of socialization–or, indeed, of something else–is a question that is beyond the reach of the

tools employed in this analysis. Nonetheless, it suggests that although the distinctiveness of Muslim-Canadian opinions is particularly pronounced among foreign-born Muslims, it is not confined to them.

These results point to important sources of heterogeneity with the Muslim Canadian community. Muslims are not a single monolithic group. Indeed, native-born Muslims with a university education are far less distinctive from other Canadians with a university education than native-born Muslims with a very low level of education are from other similarly educated Canadians. There appears to be something about exposure to formal education in Canada–as opposed to exposure to formal education in the countries from which Muslims emigrate–that is associated with a marked liberalization of Muslim-Canadian opinions about same-sex marriage. This effect, moreover, does not operate through religiosity. A higher level of education is not associated among Muslims with lower levels of religiosity.

To the extent that the results uncovered here are generalizable to other contexts, and to the extent that they stand up to replication using new data, the substantive conclusions may well be important for the broader debate about Muslim immigration in liberal societies. Muslim-Canadian opinion about same-sex relationships is not, first and foremost, a story about Islam. Rather, it is primarily a story about religiosity and of immigrant integration more generally. To be sure, opposition to all forms of legal recognition of same-sex marriage is more common among Muslim-Canadians than among other Canadians. However, within this Muslim-Canadian community, this opposition is confined to those who were born in countries where opposition to gay rights is common– regardless of their level of formal education–and to those who were born in Canada but have no exposure to post-secondary education. Canadian-born Muslims with a university degree are no more opposed than other university-educated Canadians to the legal recognition of same-sex relationships. It seems that the school is more important than the Mosque as a source of Muslim-Canadian opinions about same-sex relationships.

More generally, the findings in this paper challenge the analytical utility of following the convention in political discourse that treats Muslims as a distinctive category whose aggregate properties are then associated with the lone characteristic–Islam–that defines the boundary for this group as a whole. Religiosity in general, rather than Islamic religiosity in particular, is associated with heightened opposition to same-sex marriage. Being born and raised in regions of the world where opposition to homosexuality is common is, for Muslims and non-Muslims alike, associated with opposition to same-sex relationships among recent immigrants, but the effect wanes

over time with exposure to the new society. And the effect of exposure to higher levels of education in the new society is powerfully and consistently associated with more liberal attitudes toward same-sex marriage; however, this association applies for second-generation immigrants more generally, rather than for Muslims in particular. The rapid cultural transformation in Canada around the issue of sexual orientation progressed, in less than two decades, from a point where sexual minorities were ostracized in public and private life to a point where the acceptance of sexual diversity is considered by many as a defining element of the country's political culture and, indeed, as an "index of civilization" (Scott, 2009). This new political climate is often leveraged in Canada, as it is elsewhere, against Muslims. The results in this paper, however, suggest that there is nothing distinctive about Canadian Muslims when public opinion is examined from the vantage point of individual-level predictors of attitudes toward same-sex marriage.

Note

1. The region of birth variables for foreign-born Muslims are held constant at their aver- age level among all immigrants, thus setting to 1, in effect, the constituent variable "immigrant" in the interaction terms for Muslim.Immigrant, Immigrant.Education, and Muslim.Immigrant.Education.

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About the author

Christopher Cochrane, *University of Toronto.*
E-mail: christopher.cochrane@utoronto.ca.

Venue-Shopping and the Role of Non-governmental Organisations in the Development of the European Union Asylum Policy

Christian Kaunert, Sarah Léonard & Ulrike Hoffmann

Abstract

The development of cooperation on asylum and migration matters in the European Union (EU) has often been explained as the result of 'venue-shopping', that is, the move by national policy-makers to a new EU policy venue in order to circumvent domestic obstacles. However, focusing on the case of asylum, recent literature has argued that, contrary to expectations, the move to the EU policy venue has actually resulted in a rise in asylum standards overall. This can be explained by a series of treaty changes that have resulted in the increasing 'communautarisation' and 'judicialisation' of the EU asylum policy venue. This article seeks to further contribute to these debates by examining the hitherto neglected role of refugee-assisting non-governmental organisations (NGOs) in this process. It argues that, contrary to the expectation that venue-shopping to the EU level would enable policy-makers to free themselves from NGO monitoring, NGOs have actually increasingly organised their advocacy work at the EU level in recent years. The treaty changes to the EU asylum policy venue have also increased advocacy opportunities for NGOs, which have enabled them to exercise a significant level of influence over the EU asylum policy-making process, especially at the policy drafting stage. It can be concluded that the current configuration of the EU asylum policy venue offers more opportunities for NGOs to exercise their influence on the development of the EU asylum policy than ever before.

Keywords: Advocacy, Asylum, EU asylum policy, Lobbying, Non-governmental organisations, Qualification Directive, Recast Qualification Directive, Venue-shopping

1.   Introduction

Following the entry into force of the Treaty of Amsterdam in 1999, asylum has become a particularly dynamic policy area in the European Union (EU) (Peers and Rogers, 2006; Ferguson Sidorenko, 2007; Kaunert, 2009, 2010). However, this intensified EU cooperation on asylum matters has been widely criticised. Many scholars have argued that it has led to the gradual establishment of a 'fortress Europe' that does not fully respect the human rights of asylum-seekers and migrants (Ireland, 1991; Joly, 1996; Brouwer and Catz, 2003; Levy, 2005; Baldaccini and Guild, 2007; Chebel d'Appollonia and Reich, 2008; Guild, 2004, 2006, 2009). Some scholars have explained this trend using securitization theory – in their view, asylum and migration have been 'securitized', that is, socially constructed as security threats to the EU (Huysmans, 2000, 2006; Guild, 2003; Colman, 2006; Chebel d'Appollonia and Reich, 2008; Van Munster, 2009).

Another popular explanation of this restrictive trend has been developed by Guiraudon using the concept of 'venue-shopping' (2000). 'Venue-shopping' refers to the idea that policy-makers who encounter obstacles in their traditional policy venue generally seek new venues for policy-making that are more amenable to their preferences and goals. Thus, Guiraudon has argued that national officials began to cooperate on asylum and migration matters at the EU level in a bid to circumvent the domestic obstacles that they encountered when attempting to strengthen migration controls at the beginning of the 1980s (Guiraudon, 2000: 252). More precisely, venue-shopping to the EU level enabled domestic policy-makers to circumvent three types of obstacles that jeopardised the success of their attempts at increasing migration controls, namely judicial constraints, other more 'migrant-friendly' political actors, and pro-migrant non-governmental organisations (NGOs). In a recent article focusing on the EU asylum policy, Kaunert and Léonard (2012) have revisited the venue-shopping argument. They have concluded that the EU asylum policy venue has significantly changed compared to its configuration at the time of its analysis by Guiraudon. The twin processes of 'communautarisation' and 'judicialisation' of asylum have meant that, overall, asylum standards in the EU have actually been raised, rather than made more restrictive – a view shared by other scholars such as Hailbronner (2008) and El-Enany and Thielemann (2011). However, their article did not consider the aforementioned third obstacle that, according to Guiraudon, national policy-makers were endeavouring to escape when venue-shopping to the EU level, namely NGOs advocating the reinforcement of the rights of asylum-seekers and migrants. The role of

NGOs in the development of the EU asylum and migration policy was not considered by the rest of the literature on venue-shopping either (Lavenex, 2006; Lahav and Guiraudon, 2006; Maurer and Parkes, 2007). This is precisely the gap that this article seeks to address with a particular focus on the issue of asylum. How have refugee-assisting NGOs responded to the venue-shopping of the national governments to the EU level? More precisely, to what extent have they organised themselves at the EU level and managed to influence the development of the EU asylum policy?

For this purpose, this article is structured as follows. Firstly, it discusses the concept of venue-shopping and its application to the development of EU cooperation on asylum and migration matters, before developing an amended venue-shopping framework to be applied to the EU asylum policy. The following section examines the impact that venue-shopping to the EU level and the subsequent changes made to the EU asylum policy venue have had on the activities of refugee-assisting NGOs. It shows that, overall, the switch to an EU venue for asylum policy-making has led to an increase in NGO organisation at the EU level. The third section turns to the important question of the actual influence of the refugee-assisting NGOs on the EU asylum policy, as presence does not necessarily equate with influence at the EU level. This question is addressed by examining the influence of the NGOs on the adoption of two key directives on asylum, namely the so-called 'Qualification Directive' and 'recast Qualification Directive'.

2.   Venue-shopping and the EU Asylum and Migration Policy

The venue-shopping approach to the study of the EU asylum and migration policy was originally developed by Guiraudon (2000), who drew upon the work by Baumgartner and Jones on 'policy venues'. 'Venue-shopping' refers to the idea that policy-makers seek to avoid obstacles to the realisation of their policy preferences by looking for new policy venues that appear more favourable to the attainment of their goals. On that basis, Guiraudon (2000: 252) has argued that policy-makers in charge of asylum and migration matters venue-shopped to the European level in the 1980s because they faced domestic opposition to their attempts at increasing migration controls. The domestic obstacles that they encountered notably took the form of judicial constraints, namely the jurisprudence of higher courts – a phenomenon often referred to as the 'judicialisation' of asylum and migration policies (Gibney, 2001). Interior Ministers also found themselves obliged

to compromise with other ministries, including Labour and Social Affairs, when making national legislation (Guiraudon, 2000; Lahav and Guiraudon, 2006; see also Joppke, 1998, 2001; Joppke and Marzal, 2004; Freeman, 1995, 2006), in addition to seeing their work being monitored by NGOs advocating for the rights of migrants and asylum-seekers.

Guiraudon (2000) argues that, against this backdrop, venue-shopping to the EU level enabled domestic policy-makers to circumvent those obstacles that jeopardised the success of their attempts at increasing migration controls. First of all, venue-shopping allowed policy-makers to avoid judicial constraints, as the European Court of Justice (ECJ) had virtually no competence to adjudicate on asylum and migration matters under the Treaty of Maastricht (1993) and was only given limited competences in this policy area by the Treaty of Amsterdam (1999). In addition, venue-shopping to the EU level enabled Interior ministries to largely exclude 'migrant-friendly' actors such as the European Commission and the European Parliament from the decision-making process. This was because asylum and migration policies were included in the separate Justice and Home Affairs 'Third Pillar', which was largely intergovernmental and significantly limited the role of the EU supranational institutions. In so doing, asylum and migration matters were further decoupled from related issues, such as employment and social affairs, which were part of the European Community 'First Pillar'. Finally, the switch to the EU policy venue had the perceived advantage of making it more difficult for NGOs to monitor policy-making on asylum and migration, as these organisations had been hitherto organised primarily at the national level. According to Guiraudon (2000: 264), at the end of the 1990s, '[m]igrant aid organizations [... had] difficulty in trying to supervise transgovernmental policy-making'. In her view, there was no '"transnational activist network" equivalent to EU lobbies in other fields such as the environment', notably because of a significant lack of resources (Guiraudon, 2000: 264).

For the purpose of this article, several modifications have been made to the venue-shopping framework as it was developed and applied by Guiraudon (2000). First of all, it is argued that it is necessary to distinguish between the issues of asylum, migration and borders. Although they are related, they have not always been governed on the basis of the same institutional arrangements. In addition, the EU treaties clearly indicate that policy-makers seek to achieve different goals with respect to each of them (Kaunert and Léonard, 2012). As a result, it can be argued that, in practice, asylum, migration and borders are each dealt with in a distinct policy venue, which can be analytically separated from the others. The present

article focuses on the EU asylum policy and, consequently, the EU asylum policy venue. The EU has defined the goal of its 'common policy on asylum, subsidiary protection and temporary protection' as 'offering appropriate status to any third-country national requiring international protection and ensuring compliance with the principle of 'non-refoulement' (Article 78 of the Treaty on the Functioning of the European Union (TFEU)).

Secondly, this article advocates a more dynamic approach to venue-shopping by analysing the development of a policy venue over time, rather than providing a snapshot of this venue at a given time. This is necessary when analysing any EU policy, given the important modifications that have been introduced by the various EU treaties over the years, in particular the Treaty of Amsterdam (1999) and the Treaty of Lisbon (2009). As already suggested by Baumgartner and Jones (2009: 216), changes to a policy venue may have a significant impact on the behaviour of the actors concerned. In the literature on the EU, this idea has been confirmed by studies on the influence of the gradual extension of co-decision to a growing number of policies over the behaviour of Members of the European Parliaments (MEPs), such as Ripoll Servent's works (2012, 2013) on various aspects of the Area of Freedom, Security and Justice (AFSJ). Thus, for example, the entry into force of the Treaty of Lisbon in December 2009 has led to changes in the competences and relative power positions of the various actors in the EU asylum policy venue. Such modifications may have affected the preferences and behaviour of the actors concerned, which in turn may have had a significant impact on policy outcomes. It is therefore necessary to consider the evolution of any given policy venue over time.

Thirdly, this article adopts a different approach than Guiraudon's to the preferences of the Member States. More precisely, it does not assume that the EU Member States use venue-shopping to pursue restrictive asylum and migration policies. The ideas that all 28 Member States would share the same preference for restrictive asylum policies and that this would remain constant over time are put into question. There are two main reasons for doing so. First of all, Western states generally do not pursue unequivocally restrictive asylum and migration policies. This is aptly illustrated by former French President Sarkozy's call for 'immigration choisie' rather than 'immigration subie' (Bonjour, 2011: 91). For a variety of reasons, including the existence of pull-factors in the destination states, Western states accept 'unwanted migration' (Joppke, 1998). As a result, there is a migration control gap, since the goals and the actual outputs of national migration policies do not coincide (Cornelius, Martin and Hollifield, 1994). In light of this literature, it could therefore be an over-simplification to assume that all

EU Member States consistently pursue the adoption of restrictive asylum and migration measures. Moreover, given that EU cooperation on asylum has developed over time, it can be argued that national interests are at least partly the result of international cooperation (see Katzenstein, 1996). Thus, in line with the works of scholars such as Haas (1958) and Sandholz (1993), preference formation can be regarded as endogenous of institutionalised cooperation, that is, partly resulting from the cooperation itself. As a result, it is likely to see the preferences of the Member States over asylum evolve at least partially over time as a result of their cooperation within the EU institutional context. This also means that venue-shopping is not a risk-free strategy. Actors who decide to venue-shop may encounter unanticipated obstacles, such as changes in the preferences of the other actors involved or the appearance of new actors in the new venue with different, perhaps even opposite, policy preferences.

Having developed an amended venue-shopping framework, it is now possible to consider the impact of venue-shopping to the EU level on refugee-assisting NGOs. First of all, the article will consider the extent to and the ways in which venue-shopping in the area of asylum had led the NGOs to organise their work at the EU level. The following section will consider the extent to which the NGOs have been able to influence the development of the EU asylum policy, using the cases of two key directives on asylum, namely the so-called 'Qualification Directive' and 'recast Qualification Directive'.

3.   The Impact of Venue-shopping to the EU Level on Refugee-assisting NGOs

According to Guiraudon (2000), the growth in European cooperation on asylum matters in the 1980s and 1990s was not initially matched by the development of monitoring of these activities by refugee-assisting NGOs. This is not to say that there was no transnational cooperation amongst NGOs advocating for the rights of refugees at the time (Niessen, 2002). Actually, the oecumenical Churches' Commission for Migrants in Europe (CCME) was established as early as 1964, whilst the European Council on Refugees and Exiles (ECRE), which is a pan-European alliance of NGOs assisting refugees, was founded in 1974. However, initially, these organisations found it generally difficult to monitor the development of European asylum cooperation. This was due to several factors, including a relative lack of resources and the secrecy surrounding European asylum cooperation, both outside and

subsequently inside the framework of the EU following the entry into force of the Treaty of Maastricht.

However, the growing cooperation on asylum matters in Europe has led to significant changes in the political opportunity structures for groups advocating the attribution of higher protection standards and extended rights to asylum-seekers. From a policy venue largely dominated by the Member States – and more precisely, their Interior Ministers – under the Treaty of Maastricht, the EU asylum policy venue has gradually evolved into a policy venue where EU supranational institutions matter. This is important for refugee-assisting NGOs, as an increase in the number of actors involved entails an increase in their opportunities for advocacy. The EU asylum policy venue has evolved as a result of the changes introduced by the various EU Treaties. Under the Treaty of Maastricht, Member States largely dominated the asylum policy venue. The European Commission was only 'fully associated with the work' in the area of asylum, whilst the role of the European Parliament was limited to being informed and consulted on the initiatives of the Member States. As for the ECJ, it had virtually no role with respect to EU asylum provisions (Article K of the Treaty of Maastricht). These institutional arrangements were significantly changed by the Treaty of Amsterdam, which entered into force in 1999. The role of the European Commission was reinforced as it received the competence to draft proposals on various aspects of the EU asylum policy. However, during a transitional period of five years, it had to share its right of initiative with the Member States. During this period, the Council took decisions unanimously after consulting the European Parliament. The Treaty of Amsterdam also gave the ECJ a more prominent role in the EU asylum policy venue (Article 73(p) of the Treaty of Amsterdam). Finally, the Treaty of Lisbon, which entered into force on 1 December 2009, further strengthened the role of the European Parliament and of the ECJ respectively. First of all, it foresees that all asylum legal instruments should be adopted in accordance with the ordinary legislative procedure, which is laid down in Article 294 TFEU. This means that the European Parliament has now acquired joint decision-making powers on asylum, which represents a significant increase in power for this institution compared to previous institutional arrangements, whilst the Council takes decisions by qualified majority voting. In addition, judicial control has been expanded, as the Court's[1] role has been strengthened with respect to the AFSJ, including the EU asylum policy. In particular, the Court's preliminary jurisdiction, which used to be limited, has been expanded and generalised to all AFSJ matters by the Treaty of Lisbon, with respect to both primary and secondary law. Thus,

the various treaty changes over the years have led to a diversification of the actors involved in the EU asylum policy venue and the strengthening of the EU institutions traditionally seen as more 'friendly' towards migrants and asylum-seekers, such as the European Commission, the European Parliament and the Court (Guiraudon, 2000). As a result, refugee-assisting NGOs now have more advocacy opportunities than a few years ago.

Nevertheless, despite this gradual expansion of advocacy opportunities, not all refugee-assisting groups are able or willing to engage with EU policy-makers. Grass-root movements generally refrain from including the EU institutions in their advocacy strategy. This is mainly due to the fact that their organisational structure, main arguments and activities do not fit the EU procedures and the needs of the EU institutions (Danese, 1998; Geddes, 1998; Gray and Statham, 2005; Guiraudon, 2001; Monforte, 2009). Grass-root movements are mainly oriented towards mobilising public opinion through demonstrations and petitions. Their claims are politicised and framed according to the national context in which they operate. Furthermore, these groups mainly rely on their activist base and therefore lack an appropriate organisational structure. In contrast, for an organisation to efficiently operate at the EU level, it requires the capacity to monitor the whole policy process. Only groups that employ asylum experts and have established a secretariat in Brussels are able to liaise continuously with EU policy-makers and closely follow the development of policy initiatives. By the same token, transnational networks or umbrella groups with members in different EU Member States are more likely to provide the EU institutions with the information that those need for drafting European solutions to asylum issues. As a consequence, as will be shown in greater detail in the next section, rather than national grass-root movements, the organisations that operate at the EU level are professionalised lobby groups, international NGOs and European umbrella groups of national associations (Interviews 1, 7, 8, 9, 10, 11, 17, 20, 23, 28, 29). The establishment of these groups has actually been promoted and subsidised by the European Commission and the European Parliament, as they considered that European integration could not ignore the issue of the integration of non-EU citizens. The European Commission and the European Parliament also saw the help that these NGOs could give them to devise European solutions to asylum problems and challenges, thereby strengthening their own position in the EU asylum policy venue (Geddes, 1998, 2000; Guiraudon, 2001). In that respect, the expertise offered by the NGOs ranges from legal advice on the interpretation of international conventions and case law to 'on-the-ground' information

about national asylum practices and obstacles to the implementation of EU asylum legislation.

Thus, it can be concluded that venue-shopping to the EU level and the subsequent changes to the composition of the EU asylum policy venue have led to an increase in advocacy opportunities for refugee-assisting NGOs. Those have increasingly organised their activities at the EU level, although it should be remembered that some important initiatives, such as the establishment of ECRE, actually pre-date venue-shopping to the EU level. Having considered the impact of venue-shopping to the EU level on the refugee-assisting NGOs and the organisation of their activities, it is also important to consider the extent to and the ways in which these NGOs have been able to exercise any influence on the development of the EU asylum policy.

4.   The Influence of Refugee-assisting NGOs on the Development of the EU Asylum Policy

Given the space constraints inherent to this article, it is not possible to examine here all the asylum provisions that have been adopted by the EU. In order to analyse the possible influence of refugee-assisting NGOs on the development of the EU asylum policy, it is therefore suggested to focus on two key asylum directives, namely the Qualification Directive and the recast Qualification Directive. The Qualification Directive (Council Directive 2004/83/EC) set standards for identifying people in need of international protection in the EU either as refugees or as beneficiaries of subsidiary protection, as well as laying down a minimum level of benefits and rights for both categories of beneficiaries of international protection throughout the EU. However, a comprehensive impact assessment of its implementation by the Member States concluded that there was further need for approximating the grounds for and the content of international protection. As a consequence, the European Commission opened a recast procedure that led to the adoption of the recast Qualification Directive in December 2011 (Directive 2011/95/EU of the European Parliament and of the Council). This directive further raised asylum standards in the EU by introducing several changes, including the clarification of various concepts through the incorporation of recent case-law of the Court of Justice of the EU and of the European Court of Human Rights, measures to better take into account gender-related issues and children's interests in asylum assessment processes, the approximation of the rights granted to refugees and benefi-

ciaries of subsidiary protection relating to health care and employment, as well as the extension of the period of validity of residence permits issued to beneficiaries of subsidiary protection in some circumstances.

These two directives have been chosen amongst the various asylum directives adopted in recent years for two main reasons. First of all, the Qualification Directive and its recast are arguably the most important components of the CEAS. They clarify the criteria for granting international protection – a fundamental aspect of international protection, which supersedes the matters such as temporary protection, asylum procedures and reception conditions that are the object of the other directives. Moreover, the selection of two directives dealing with the same subject, but adopted under different treaty arrangements, allows for the analysis of the impact of the changes made to the decision-making procedures in the asylum policy venue over time.

The remainder of this section investigates the influence of refugee-assisting NGOs on the development of the EU asylum policy, contrasting the case of the Qualification Directive with that of the recast Qualification Directive. In that way, it is possible to highlight the possible impact of the changes made to the asylum policy venue on the activities and influence of the NGOs. However, before proceeding further, it is necessary to first elaborate upon the methodology used.

4.1. Analysing the Lobbying Strategies of Refugee-assisting NGOs and their Influence over the Qualification Directive and the recast Qualification Directive

Assessing the lobbying strategies and the influence of interest groups such as refugee-assisting NGOs is a complex task, as those cannot be directly observed. Some methodological observations are therefore in order. First of all, for the purpose of this article, influence is understood as the capability of a refugee-assisting NGO to modify the behaviour of another EU actor through distributing policy papers and liaising with EU decision-makers. In addition, the following methodology was used to evaluate the influence of the refugee-assisting NGOs. Firstly, their goal achievement was analysed, by systematically comparing their position papers with the official documents emanating from the EU institutions as part of the policy-making process. To what extent were the recommendations made by the NGOs reflected in the EU official documents? Although it is possible to provide percentages of the recommendations of the NGOs that also appear in the official documents, the present article does not provide such figures, but rather a qualitative assessment. A less mechanistic assessment is arguably more suitable, since

not all provisions have the same significance and impact on the asylum systems of the Member States. The issue of persecution by non-state actors, which has led to considerable changes in the national legislation of several EU Member States, including France and Germany, is a case in point (El- Enany and Thielemann, 2011: 106-107). Nevertheless, the existence of congruence between the positions of a given refugee-assisting NGO and an EU institution does not necessarily constitute evidence of successful lobbying of this institution on the part of the NGO. The EU institution may have held this position prior to or independently from the lobbying of the NGO. Furthermore, many of the recommendations made by the refugee-assisting NGOs reflect existing instruments, such as the Geneva Convention relating to the Status of Refugees, which is binding on its signatories, guidelines produced by the UNHCR that advise the states and the EU institutions on asylum matters, as well as recent case law by the Court of Justice of the EU and the European Court of Human Rights. Congruence between an EU official document and a position paper published by an NGO may therefore have been more prompted by the existence of these standards than by the lobbying work of the NGOs. In order to address this problem, a second step in the analysis consisted of establishing the influence that is attributed to the refugee-assisting NGOs. This was done by asking the representatives of the various refugee-assisting NGOs to conduct a self-assessment of their influence, whereas officials from the EU institutions were asked to peer-assess the influence of the NGOs. Concerning the methods used, the research results that are presented in this article are based on exhaustive documentary analysis and semi-structured expert interviews. The European Commission's online consultation on the 'Future of the Common European Asylum System' (Commission of the European Communities, 2007) constituted the starting point of the sampling exercise, followed by snowballing sampling to identify further interest groups and position papers. In total, eight pro-migrant groups confirmed that they had actively lobbied on the two directives. As a result, 30 interviews were conducted with interest representatives and EU officials.

4.2. Refugee-assisting NGOS and the EU Asylum Policy under the Treaty of Amsterdam: The Case of the Qualification Directive

Concerning the original Qualification Directive, which was adopted under the Treaty of Amsterdam, ECRE, the Amnesty International European Institutions Office (AI Europe), and various organisations gathered in the 'Churches and Christian Organisations in Europe on Migration and Asylum'

(CCOEMA) network – namely Caritas Europa, CCME, the Commission of the Bishops' Conferences of the EC, the International Catholic Migration Commission, the Jesuit Refugee Service-Europe, and the Quaker Council for European Affairs – actively tried to lobby the Council (AI Europe, 2001a, 2001b, 2002a, 2002b, 2003; CCOEMA, 2002; ECRE, 2001; Khan, 2001). ECRE was the only group that lobbied both the Council and the European Commission during the drafting stage of the Qualification Directive proposal (ECRE, 2000a, 2000b). No refugee-assisting NGO appears to have developed any lobbying strategy towards the European Parliament at the time.

With regard to goal achievement, at the drafting stage, ECRE was fairly successful. Its recommendations and the Commission's proposal for the Qualification Directive especially concur on the general provisions and the chapter that defines the qualification criteria for international protection, such as the provision concerning non-state actor persecution. However, one observes less congruence between the positions of the refugee-assisting NGOs and those the Council. Less than half – and even, in the case of some NGOs, less than a third – of the recommendations put forward by refugee-assisting NGOS were reflected in the Council's positions. The NGOs were particularly unsuccessful when it came to the chapter determining the content of international protection, especially on the issue of the unequal treatment of refugees and beneficiaries of subsidiary protection with regard to the validity of residence permits, access to travel documents, employment, and integration facilities.

While most of the interest representatives that were interviewed on the influence of their group remained rather modest about their lobbying success on the Qualification Directive, a representative of ECRE distinguished between the level of influence over the European Commission and that over the Council. According to him, many of the recommendations made by ECRE were reflected in the proposal of the European Commission, but were not adopted by the Member States (Interviews 1, 8, 11, 20, 28). Confirming the impression of the representative of ECRE, the Commission official in charge of drafting the proposal for the directive admitted that the European Commission 'benefited from the expertise and input of this kind of think tanks because they were badly needed' (Interview 3). Further reflecting the self-assessment of the NGOs, the rapporteur for the Qualification Directive proposal in the European Parliament and a member of the Council General Secretariat assessed the impact of the NGOs over the Council as being marginal (Interviews 2 and 16).

4.3. Refugee-assisting NGOS and the EU Asylum Policy under the Treaty of Lisbon: The Case of the recast Qualification Directive

In the case of the recast Qualification Directive, in total eight pro-migrant groups were involved in the lobbying of the EU institutions. Five groups tried to influence the drafting of the proposal by the European Commission – AI Europe (2007), the CCOEMA network (2007), ECRE (2007), the European Women's Lobby (EWL) (2007), and the Red Cross (2007). At the decision-making stage, the European Parliament and the Council were lobbied by the CCOMEA network (2010), ECRE (2009, 2010a, 2010b, 2010c, 2010d, 2011), Terre des Hommes (TdH 2009), EWL, Asylum Aid, and the European Region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association (EWL, Asylum Aid, ILGA 2010), as well as the Red Cross (2010).

The analysis of the goal achievement of the NGOs shows that the vast majority of the provisions that they suggested were reflected in the proposal of the European Commission. This was particularly the case when it came to the establishment of one single protection status with regard to rights, such as family unity, residence permit, travel documents, employment, education, recognition of qualifications, social welfare, health care, accommodation, free movement, and integration facilities. In contrast, only about half of the recommendations made by the refugee-assisting NGOs were reflected in the positions adopted by the Council and the European Parliament.

Concerning the assessment of their influence, representatives of AI Europe and the Red Cross expressed scepticism as to their ability to having exerted significant influence on the outcome of the recast Qualification Directive negotiations (Interviews 9 and 20). Representatives of the organisations gathered in the CCOEMA network also remained modest about their influence on the directive. They expressed their disappointment about the fact that the subsidiary protection status had not been fully aligned on the refugee status by the new directive (Interviews 1 and 11). In contrast, representatives of EWL, ILGA, and Asylum Aid were considerably more positive about their influence on both the European Commission and the European Parliament, notably with respect to the inclusion of the concept of gender identity. Nevertheless they regretted not having been able to convince the Council on other provisions, such as the extension of the definition of family (Interviews 10, 23, 29). A representative of ECRE made a similar distinction. While she generally saw 'no political willingness within the states for this legislation at the moment', she considered ECRE to have been 'quite influential on the approximation of rights for example'

at the drafting stage (Interview 17). Finally, a former representative of TdH declared his satisfaction as to the outcome of the recast Qualification Directive. However, he also emphasised that, at the same time, he believed that the overall influence of TdH had been limited (Interview 5).

Concerning the peer-assessment of the influence of the NGOs, the Commission official responsible for drafting the recast Qualification Directive confirmed the impression of several NGO representatives when she acknowledged that 'some things for sure were integrated after discussions with NGOs but also filtered in order to fit the logic of the whole text' (Interview 18). The assessment of the European Parliament was different, as the rapporteur and shadow rapporteurs for the recast Qualification Directive held significantly different views. While some of them considered that refugee-assisting NGOs had exercised medium influence on the directive, others considered their impact on the policy-making process negligible (Interviews 16, 19, 22, 27, 30). For some Justice and Home Affairs Councillors, refugee-assisting NGOs exercised influence over the European Commission and the European Parliament, but not over the Council (Interviews 2, 4, 6, 12, 13, 14, 15, 21, 24, 25, 26).

4.4. Refugee-assisting NGOs and the Changing Character of the EU Asylum Policy Venue

The comparison of the behaviour of refugee-assisting NGOs towards the EU institutions under the Treaties of Amsterdam and Lisbon has highlighted several important points. First of all, it is evident that there has been a significant increase in the number of groups actively seeking to influence the development of the EU asylum policy in recent years. Secondly, since the entry into force of the Treaty of Amsterdam, the European Commission has emerged as a key actor to be lobbied by the NGOs. It is perceived as both playing a pivotal role, given its right of initiative (which has become a sole right of initiative since 2004), and being generally open and responsive to the demands of the refugee-assisting groups (Interviews 1, 7, 8, 19, 11, 17, 20). This is markedly different from the situation under the Treaty of Maastricht where the Justice and Home Affairs Taskforce, which preceded the first Justice and Home Affairs Directorate-General in the Commission, had the reputation of not interacting with the NGOs (Guiraudon, 2000: 263). However, some NGO representatives were of the opinion that the European Commission had recently become less responsive to their claims than before, because it sensed some reluctance amongst the Member States towards more progressive and liberal provisions and sought not to antagonise them (Interviews 10 and 23). Thirdly, the European Parliament

has been generally perceived as an accessible institution (Interviews 1, 2, 9, 10, 11, 17, 20, 23), which has also had the reputation of being a 'friend of third country nationals' since the 1970s (Guiraudon, 2000: 264). However, under the Treaty of Amsterdam, it was not viewed as a priority institution for lobbying by the NGOs, because it was only consulted as part of the policy-making process – and, thereby, largely ignored in practice. This considerably changed with the entry into force of the Treaty of Lisbon, which has transformed the European Parliament into a co-legislator on asylum matters (Interviews 1, 20). The European Parliament is now another key-target for lobbying by the refugee-assisting NGOs. However, some NGO representatives mentioned that MEPs are not as supportive of their progressive recommendations as they were under the Treaty of Amsterdam. They appear to be more concerned than before about matters of cost and feasibility (Interviews 1 and 29). This observation chimes with the works of Acosta (2009) and Ripoll Servent (2011, 2012, 2013) who have observed similar shifts in the positions of the European Parliament on other aspects of the AFSJ. Fourthly, since the days of the Treaty of Maastricht, the Council has been seen as a powerful policy-maker. However, it continues to be perceived as significantly less accessible and less responsive towards the ideas of the refugee-assisting NGOs. Above all, interest representatives complain about the opaque internal structure and procedures that make approaching the General Secretariat of the Council extremely difficult. They therefore tend to focus their advocacy work on the Permanent Representations of the Member States, the rotating EU Presidencies, and national ministries (Interviews 1, 5, 7, 8, 9, 10, 11, 17, 20, 23, 28, 29).

5.   Conclusion

This article aimed to contribute to the scholarly debates on venue-shopping and the EU asylum policy by examining the hitherto neglected role of refugee-assisting NGOs in this process. It has demonstrated that, contrary to the expectation that venue-shopping to the EU level would enable policy-makers to free themselves from NGO monitoring, NGOs have actually increasingly organised their advocacy work at the EU level in recent years. The treaty changes to the EU asylum policy venue have also increased advocacy opportunities for NGOs. This has enabled them to exercise a significant level of influence over the EU asylum policy-making process, especially at the policy drafting stage. Thus, this article has further refined the argument put forward by Kaunert and Léonard (2012) by highlighting how the more

progressive preferences of the more 'refugee-friendly' institutions such as the European Commission and the European Parliament have been at least partially shaped and influenced by the lobbying of refugee-assisting NGOs.

Finally, the article has also confirmed the importance of considering the evolution of policy venues over time in any analysis of venue-shopping, as advocated in the theoretical section of this article. The comparison of the NGOs' attempts at influencing EU institutions in the cases of the Qualification Directive and the recast Qualification Directive has demonstrated that the institutional arrangements governing a policy venue have a significant impact on the preferences and behaviours of the actors concerned. It has been demonstrated that the gradual reinforcement of the powers of the European Commission and the European Parliament has been accompanied by a certain move away from their initially more generous and liberal asylum positions. However, it is important to emphasise that they continue to promote significantly less restrictive positions than the Council. In other words, compared to the pre-2004 situation, refugee-assisting NGOs now benefit from more advocacy opportunities, whilst the powers of the more refugee-friendly institutions have also been enhanced. This means that, overall, even if the positions of the European Commission and the European Parliament may be slightly less liberal or inclusive than they were before, the current configuration of the EU asylum policy venue offers significant opportunities for NGOs to influence the content of EU asylum policy and thus co-determine the general framework within which national asylum policies are formulated.

Note

1. Since the entry into force of the Treaty of Lisbon, the EU's judicial authority has been called the 'Court of Justice of the European Union' and consists of the 'Court of Justice' and the 'General Court'.

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Interview 2 conducted with a member of Council General Secretariat staff on 14 June 2011 in Brussels.

Interview 3 conducted with a Commission desk officer on 21 June 2011 in Brussels.

Interview 4 conducted with a JHA Councillor of the Permanent Representation of Finland to the EU on 21 June 2011 in Brussels.

Interview 5 conducted with a representative of Terre des Hommes International on 27 June 2011 in Brussels.

Interview 6 conducted with a JHA Councillor of the Permanent Representation of the United Kingdom to the EU on 30 June 2011 in Brussels.

Interview 7 conducted with a former representative of Terre des Hommes International on 4 July 2011 in Brussels.

Interview 8 conducted with a representative of the Jesuit Refugee Service Europe on 5 July 2011 in Brussels.

Interview 9 conducted with a representative of the Red Cross Europe on 5 July 2011 in Brussels.

Interview 10 conducted with a representative of the European Women's Lobby on 6 July 2011 in Brussels.

Interview 11 conducted with a representative of the Churches' Commission for Migrants in Europe on 7 July 2011 in Brussels.

Interview 12 conducted by phone with a JHA Councillor of the Permanent Representation of Germany to the EU on 8 July 2011.

Interview 13 conducted with a JHA Councillor of the Permanent Representation of Latvia to the EU on 11 July 2011 in Brussels.

Interview 14 conducted with a JHA Councillor of the Permanent Representation of Hungary to the EU on 12 July 2011 in Brussels.

Interview 15 conducted with a JHA Councillor of the Permanent Representation of Belgium to the EU on 13 July 2011 in Brussels.

Interview 16 conducted with a Member of the European Parliament on 13 July 2011 in Brussels.

Interview 17 conducted with a representative of the European Council on Refugees and Exiles on 14 July 2011 in Brussels.

Interview 18 conducted with a Commission desk officer on 15 July 2011 in Brussels.

Interview 19 conducted with an Assistant to a Member of the European Parliament on 15 July 2011 in Brussels.

Interview 20 conducted with a representative of the Amnesty International European Union Office on 16 July 2011 in Brussels.

Interview 21 conducted with a JHA Councillor of the Permanent Representation of Greece to the EU on 19 July 2011 in Brussels.

Interview 22 conducted with an Assistant to a Member of the European Parliament on 20 July 2011 in Brussels.

Interview 23 conducted with a representative of the European Region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association on 20 July 2011 in Brussels.

Interview 24 conducted with a JHA Councillor of the Permanent Representation of the Netherlands to the EU on 26 July 2011 in Brussels.

Interview 25 conducted with a JHA Councillor of the Permanent Representation of Austria to the EU on 27 July 2011 in Brussels.

Interview 26 conducted with a JHA Councillor of the Permanent Representation of Poland to the EU on 29 July 2011 in Brussels.

Interview 27 conducted with an Assistant to a Member of the European Parliament on 20 July 2011 in Brussels.

Interview 28 conducted by phone with a former representative of the European Council on Refugees and Exiles on 15 August 2011.

Interview 29 conducted by phone with a representative of Asylum Aid on 1 September 2011.

Interview 30 conducted by email with an Assistant to a Member of the European Parliament on 9 December 2011.

About the authors

Christian Kaunert, *School of Humanities, University of Dundee, United Kingdom.*
Corresponding author.
E-mail: c.kaunert@dundee.ac.uk.

Sarah Léonard, *School of Humanities, University of Dundee, United Kingdom.*
E-mail: s.l.leonard@dundee.ac.uk

Ulrike Hoffmann, *School of Humanities, Languages and Social Sciences,*
University of Salford, United Kingdom.
E-mail: ulr.hoffmann@googlemail.com.

Colophon