

A Segmented Theory of Immigration Regime Development

Justin Gest, George Mason University
Anna K. Boucher, University of Sydney

Keywords: comparative, immigration, citizenship, policy, global, typology, admission

In the aftermath of the Cold War, prominent theories of immigration regimes, including notably the work of Gary Freeman, anticipated that the liberalism of the moment would infuse the governance of human migration in the future. Although the general public might have opposed immigration, it was thought, vested interests in the policy process and international pressures for the provision of human rights would promote convergence toward a new openness to immigration. Since that time, newly available demographic data suggest that such a convergence has not yet transpired. Rather, immigration regime types (hereafter “regimes”) vary across democracies and nondemocracies, and across developing and developed economies. If there is convergence, it is toward an opposing approach that is open to immigrants but principally for the purposes of short-term work, with decreasing access to citizenship. What explains the variation that we can now observe?

We begin by outlining the logic of liberal expansion, most clearly espoused by Gary Freeman,¹ and the data that suggest an alternative trajectory. We then review the factors that scholars have identified to explain immigration policy outputs and outcomes across space and time. In order to test these hypotheses, we assemble a data set of immigration outcomes in thirty of the world’s principal immigration destinations,² evaluated by the scale of their absolute annual flows, including such flows as a share of national population. While some of our data from these countries is

1. Gary P. Freeman, “Modes of Immigration Policies in Liberal Democratic States,” *International Migration Review* 29 (1995): 881–902.

2. The thirty countries include: Australia, Austria, Belgium, Bahrain, Brazil, Canada, China, Denmark, Finland, France, Germany, Ireland, Italy, Japan, Kuwait, Mexico, Netherlands, New Zealand, Norway, Oman, Portugal, Russia, Saudi Arabia, Singapore, South Korea, Spain, Sweden, Switzerland, United Kingdom, and the United States.

longitudinal, we mostly focus on cross-sectional observations of current trends. We construct a taxonomy that unifies immigration outcomes as a dependent variable into similar regime clusters and then measure bivariate correlations by plotting country-level measures of six explanatory factors and examining the extent to which they vary by cluster. From this analysis, we find that no single factor drives immigration regimes cross-nationally—a finding consistent with the conventional rejection of a “grand theory” of immigration regimes within migration studies. Instead, we build a segmented theory of immigration regime development, whereby different explanations apply for different regime clusters. We also find that similar logics extend to the way that governments understand the relationship between the admission of immigrants and their access to citizenship—different aspects of the immigration process that are not always considered in unison.

A Liberal Future

In his seminal *International Migration Review* article in 1995, Gary Freeman argued that with the end of the Cold War, the world would observe a general convergence toward expansionary immigration policies, even if countries retained distinctive models. Central to this argument was the idea of a liberal paradox that despite public opposition to immigration, vested interests in the policy process would successfully push for policy reforms and general immigration openness, leading to an expansionary bias within immigration policies. These interests consist of businesses “that profit from population growth (real estate, construction)” as well as lobbies of ethnic groups that favor increased family migration.³ The motivation for these groups to advocate for immigration policy over other groups is that such policies “tend to produce concentrated benefits and diffuse costs” for those affected.⁴ As such, immigration regimes outside of the traditional settler states, such as continental Europe, would over time come to resemble some of the key features of liberal settler states, including their approach to temporary immigration, multiculturalism, national identity, and citizenship.⁵

Similarly, Christian Joppke⁶ argued that the end of race-based selection in the settler states of Australia, Canada, and the United States heralded a new era of

3. Freeman, “Modes of Immigration Policies,” 885.

4. Ibid.

5. Freeman, “Modes of Immigration Policies,” 882, 886–87. It should be noted that this early analysis focuses exclusively on Western states and so excludes countries in Asia and the Middle East.

6. Christian Joppke, *Selecting by Origin: Ethnic Migration in the Liberal State* (Cambridge, MA: Harvard University Press, 2005).

immigration policies with positive contagion elsewhere from the 1960s onwards. Furthermore, he suggested that the principles of public neutrality and equality that underpin modern democracies render overt ethnic selection impossible in contemporary, democratic migration systems.⁷ He argued that as a nation becomes more diverse as a result of previous immigration flows, the capacity for the state to preclude some from entry would be vitiated by the equality principles that underpin multiculturalism.⁸

For other scholars, the genesis of this “liberal shift” was not interest groups lobbying at the domestic level, but rather the influence of international human rights norms. Through their diffusion to the nation-state level—the argument goes—these norms and the judiciaries protecting them have “erod[ed] the traditional basis of nation-state membership, namely citizenship” and have forced states to make concessions to immigrants.⁹ Yasemin Soysal argued¹⁰ that such norms can enable migrants to make claims against the state, creating a form of post-national membership. Others such as Jim Hollifield have argued that a pervasive gap emerges in democratic immigration states between the policy outputs and actual outcomes, leading to liberal trends in those nations.¹¹

When looking at naturalization policies, Marc Morje Howard¹² suggested that the engagement of immigrants, international norms, interest groups, and courts provided latent pressures for liberalization of citizenship policies beyond the sphere of admissions. Joppke¹³ acknowledges that since 2001, there has been a growing restrictiveness of citizenship laws and the re-ethnicization of nationality in some contexts through the reacquisition of citizenship for expatriate communities. Yet despite these trends, he argues that “the restrictive trends occurred within an overall liberal, in some cases even simultaneously liberalizing, framework.”¹⁴

7. Joppke, *Selecting by Origin*, 18–21.

8. Joppke, *Selecting by Origin*, 21.

9. David Jacobson, *Rights Across Borders: Immigration and the Decline of Citizenship* (Cambridge, MA: Cambridge University Press, 1996), 9.

10. Yasemin Nuhoglu Soysal, *Limits of Citizenship* (Chicago: University of Chicago Press, 1994).

11. James F. Hollifield, “Immigration Policy in France and Germany: Outputs versus Outcomes,” *Annals of the American Academy of Political and Social Science* 485: 113–28; and James F. Hollifield, *Immigrants, Markets and States: The Political Economy of Postwar Europe* (Cambridge, MA: Harvard University Press, 1992).

12. Marc Morje Howard, *The Politics of Citizenship in Europe* (New York: Cambridge University Press, 2009).

13. Christian Joppke, *Citizenship and Immigration* (Cambridge: Polity Press, 2010), chap. 2.

14. Joppke, *Citizenship and Immigration*, 64, 68.

An Alternative View

Despite these arguments, new research on immigration policy outcomes and admissions and citizenship outcome data across the world's most prominent destinations suggests the diffusion of an alternative vision that has strayed from the settler state model to varying extents across different countries. We do not dispute that the "liberal state" model, first developed by Freeman and then expanded by other scholars, is an important starting point for this analysis, as it highlights the trajectory that states have taken in the intervening quarter-century. However, based on a mix of longitudinal and cross-sectional data, we argue that the world's most prominent immigration destination states¹⁵ have in fact departed from a settler state model, and important differences across immigration regimes have emerged. These regime disparities can be observed in three dimensions of immigration governance—the distribution of immigrant visas, the share of visas that are for temporary labor purposes, and the rate at which immigrants naturalize.¹⁶

Visa Distribution

The distribution of immigrant visas refers to a country's relative distribution of immigrants across different types of entry visas, including those granted for the purposes of labor, family reunification, humanitarian refuge, and those covered by multilateral free movement agreements.¹⁷ Labor-related admissions—whether

15. We sought to include the most comprehensive array of cases possible to analyze variation in immigration regimes in countries with the most sizable immigration admissions programs. Due to the reporting requirements of its bureaucracies, OECD states mostly report complete sets of stock and flow data, with exceptions in countries where immigration has been less significant (e.g., Czechia, Iceland, Poland, Slovenia, Slovakia). Among countries outside the OECD, we selected country cases because they were among the world's most prominent economies and destinations, as evaluated according to two criteria: first, whether a country's migrant stock as a share of total population is comparable to prominent OECD destinations (see Figure 2.1), and second, whether the absolute quantity of migrant stock is comparable to prominent OECD destinations (United Nations. 2013. *International Migration Report*. New York: United Nations). Within these constraints, this article features an analysis of the thirty countries for which we could access full annualized data.

16. These dimensions and their constitutive variables, each of which we clarify below, are discussed in extensive detail in Anna K. Boucher and Justin Gest, *Crossroads: Comparative Immigration Regimes in a World of Demographic Change* (New York: Cambridge University Press, 2018). There are also other conceivable dimensions for such a taxonomy, such as integration outcomes or undocumented status; however, we were unable to gain consistent cross-national data on these phenomena.

17. Ideally, we would also include irregular immigration in our calculations of visa distribution. Undocumented immigrants enter a state without authorization, overstay the duration of their visas, or violate the terms of their visas. Because it is technically unauthorized, undocumented

explicitly through either permanent or temporary economic labor programs, or implicitly through free movement agreements (incorporated under the “Other” label in figures)—dominate most states’ immigration flows (see Figure 1). Among autocratic countries, these economic visas represent the vast majority of admissions. Bahrain, Kuwait, Oman, and Saudi Arabia all have rates of economic immigration over 79%. This economic focus validates observations that leaders in these countries are far less constrained by the norms and rights of both immigrants and citizens than in democracies. They are consequently more able to influence immigration outcomes than leaders in democratic states.¹⁸

However, work-based immigration is also elevated in many OECD countries. Australia, Canada, and the United Kingdom, in particular, have tilted their admissions to immigrants who enter for labor purposes, and this is enhanced by the inclusion of large numbers of accompanying family members. This reflects a trend in these countries toward skilled immigration, coupled with the maintenance of accompanying family migration rights, typically nuclear family members who are “attached” to a primary economic visa-holder spouse or parent.¹⁹

In the European Union, there has been an increase in free movement migration and a commensurate reduction of third-country nationals admitted via economic migration channels. As noted earlier, free movement migration (incorporated under the “Other” label in figures) is considered separately from labor entry, as reflected in Figure 1. Alexandra Dobrowolsky²⁰ attributes this change in the visa distribution to the prioritization of skilled third-country national migration, under the assumption

immigration may be considered beyond the scope of a regime’s control. In reality, however, many economies (and politicians) depend on *de facto* tolerance of some level of undocumented migration. See Christian Joppke, “Why Liberal States Accept Unwanted Immigration,” *World Politics* 50 (1998):266–93; Douglas Massey, “Understanding America’s Immigration ‘Crisis,’” *Proceedings of the American Philosophical Society* 151 (2007): 309–27; Jennifer L. Hochschild and John Mollenkopf, “The Complexities of Immigration: Why Western Countries Struggle with Immigration Politics and Policies,” in *Delivering Citizenship*, ed. Bertelsmann Stiftung (Berlin: Verlag Bertelsmann Stiftung, 2009); and Nicole Trujillo-Pagán, “Emphasizing the ‘Complex’ in the ‘Immigration Industrial Complex,’” *Critical Sociology* 40 (2014): 29–46. While this level represents a significant proportion of migrant stock and flows in some countries, it is a far smaller proportion in others. We treat free movement migration separately from labor migration because free movement is not always motivated by labor purposes and has different rights attached to it than labor migration.

18. Christian Breunig, Xun Cao, and Adam Luedtke, “Global Migration and Political Regime Type: A Democratic Disadvantage,” *British Journal of Political Science* 42 (2012): 825–54.

19. Eleonore Kofman and Parvati Raghuram, “Gender and Global Labour Migration: Incorporating Skilled Workers,” *Antipode* 38 (2006): 282–303; and Anna Boucher, *Gender, Migration, and the Global Race for Talent* (Manchester: Manchester University Press, 2016), chap. 4.

20. Alexandra Dobrowolsky, “(In)Security and Citizenship: Security, Immigration and Shrinking Citizen Regimes,” *Theoretical Inquiries in Law* 8 (2007): 629–61.

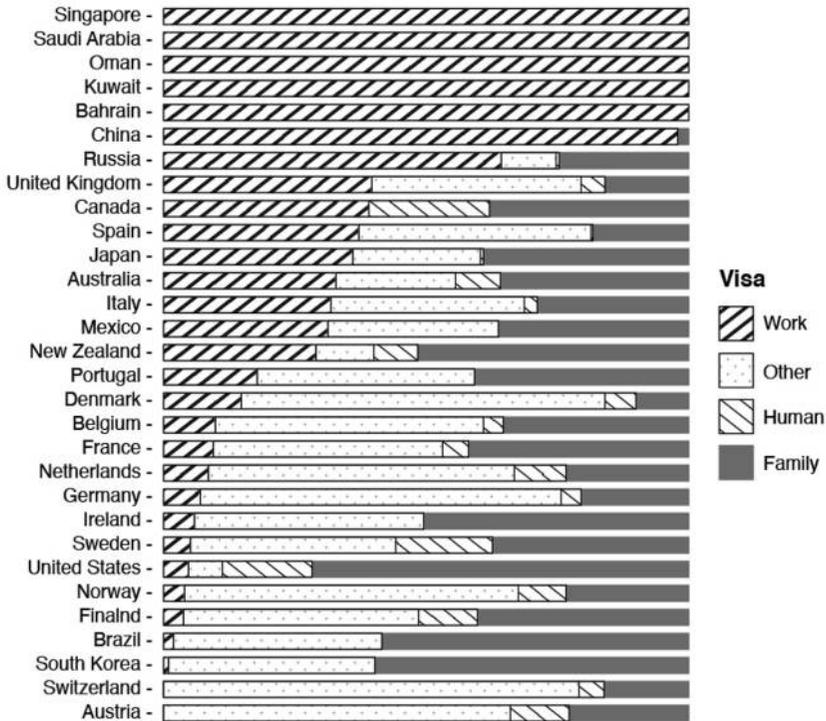


Figure 1. Visa types into selected countries, 2011.

Sources: Statistics South Africa 2011; OECD/IDB/OAS 2012; OECD standardized dataset 2013 using 2011 flow data; Bahrain: GLMM 2014a (2011 data); China: China Bureau of Entry and Exit 2011 (2009 data); Kuwait: GLMM 2013b (2011 data); Oman: GLMM 2014b (2011 data); Saudi Arabia: GLMM 2013a (2010 data). Note that these figures record flow data, as is also the case for the OECD countries.

that needs for unskilled labor could be met by internal migrants from former Eastern Bloc states. Furthermore, free movement has facilitated high flows of migrant workers accustomed to the lower pay and working conditions of recent accession states.²¹

Temporary Admissions

It is important to differentiate between permanent migration and temporary labor migration,²² which refers to those who enter a country on an expiring—even

21. Ian Greer and Virginia Doellgast, “Marketization, Inequality, and Institutional Change,” Working Paper, No. WERU 5, University of Greenwich, London, 2013.

22. Boucher and Gest, *Crossroads*, 95. See also the online appendix to the book at: <https://crossroads.earth>.

if renewable—labor visa. Temporary flows comprise at least 50% of all admissions in sixteen of the thirty cases we examine (see Figure 2). The shift toward temporary importation of labor is in part informed by a desire by governments to enjoy the economic benefits of immigration without open acceptance of the long-term social and demographic transformations that might result. Further, by retaining migrants on a temporary basis, the rhetorical argument follows that those individuals will not be able to make claims on welfare programs of host societies. In several states, concentrated on the Arabian Peninsula, 100% of economic migration is temporary.

In some respects, the focus on temporary labor is not new. The guest worker models of the 1960s and 1970s provide a considerable precedent for the current focus on temporary labor migration that we observe in most of the nations considered. Further, as Catherine Dauvergne notes, even within the former settler states of Australia, Canada, New Zealand, and the United States, there is a historical legacy

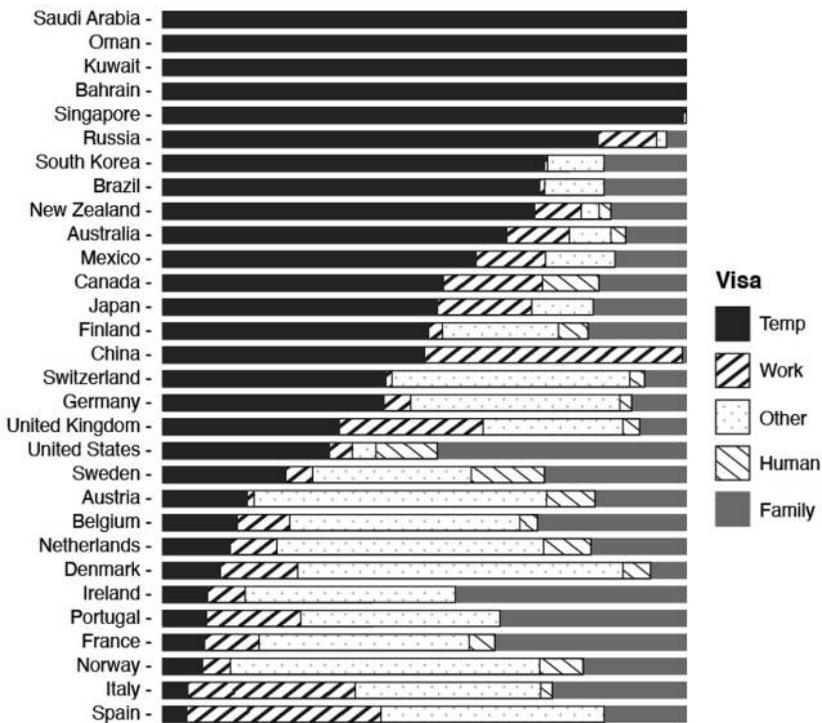


Figure 2. Temporary Ratio and Visa Mix, 2011.

Note: This bar graph visualizes temporary and permanent visa types.

Sources: Statistics South Africa 2011; OECD/IDB/OAS 2012; OECD 2013; GLMM 2013a, 2013b, 2014a, 2014b. For GCC states, temporary economic entrants include accompanying family members.

of temporary labor migration alongside “regular” nation-building migration programs.”²³ As such, although the “economic focus” within former settler states is distinctive in recent times, the fulfillment of economic needs has always been foundational for these societies.²⁴

Latin America is often identified as a region with an increasing right to migrate, at least internally, as a result of the Mercosur Agreement. Some Latin American states, however, are resisting these trends. As Luisa F. Freier and Diego Acosta Arcarazo note,²⁵ countries like Brazil, Chile, and Ecuador have not updated their immigration laws to match this liberal immigration discourse of permanent residency and free internal movement. Furthermore, Argentina, Uruguay, and Ecuador have maintained discriminatory provisions against those who enter illegally or who come from outside Latin America. These actions are at odds with a universal right to migrate.

Naturalization Rates

With regard to citizenship acquisition, naturalization rates are under 4% in twenty-one out of the thirty countries we examine (see Table 1). Because naturalization typically culminates a period of residency and qualification for citizenship, there is likely a significant lag between a tightening of admissions regulation and a decline in naturalization rates. Naturalization rates are effectively a product of the type of entry visas distributed by the government as well as other factors such as amnesties, treatment of undocumented workers, and migrants’ own agency in deciding whether to apply for naturalization. Clearly, if a government were to significantly reduce the number of visas with outlets to citizenship, the effect of such a change would not be observable for some time. Nevertheless, the overall trend of naturalization rates is down since 2000 (see Figure 3). Naturalization rates peaked in the late 1990s, just after the time that Freeman and others anticipated the expansion of liberal approaches and have generally declined in the world’s principal destinations since then.

Despite this statistical trend, Thomas Janoski²⁶ does not believe that naturalization policies have tightened as much as in the post–September 11th period. He

23. Catherine Dauvergne, *The New Politics of Immigration and the End of Settler Societies* (New York: Cambridge University Press, 2016), 119.

24. *Ibid.*, 118.

25. Luisa F. Freier and Diego Acosta Arcarazo, “Beyond Smoke and Mirrors: Discursive Gaps in the Liberalisation of South American Immigration Law,” in *A Liberal Tide? Immigration and Asylum Law and Policy in South America*, ed. David J. Cantor, Luisa F. Freier, and Jean-Pierre Gauci (London: Institute of Latin American Studies, University of London, 2015), 33–56.

26. Thomas Janoski, *The Ironies of Citizenship: Naturalization and Integration in Industrialized Countries* (Cambridge: Cambridge University Press, 2010), 261.

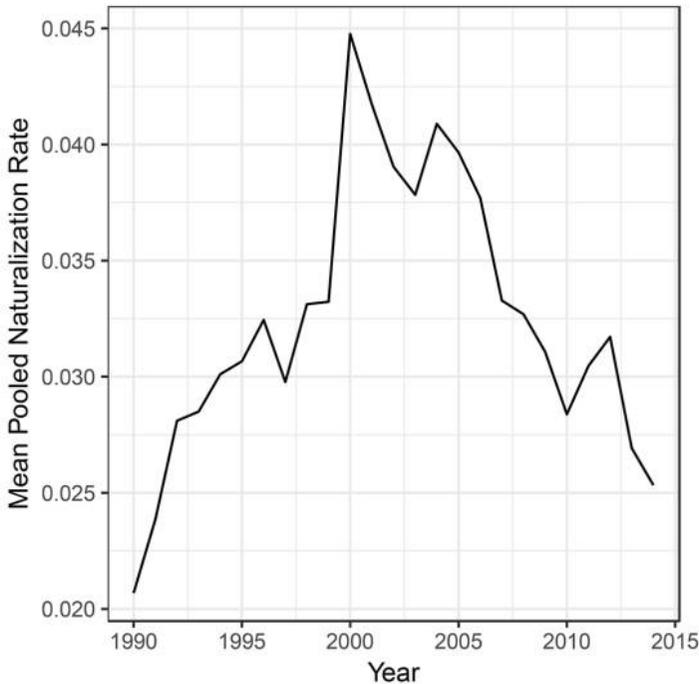


Figure 3. Mean Naturalization Rates, 1990–2014.

Note: This figure plots the mean naturalization rate among selected countries over time, revealing a downward trend since the year 2000. It excludes Russian data, which are not available.

attributes the trends we observe to strong historical factors—colonial legacies in particular—that have kept states from reducing the level and conditions of entitlement. However, there is evidence to the contrary. Keith Banting²⁷ argues that while some European nations have moved toward a Canadian-style model of multiculturalist citizenship promotion, for others, there have been a variety of illiberal shifts through policies such as those requiring civic integration courses. Works by Sara Wallace Goodman and others have found that the developed states that used to be rather open to immigrant naturalization are concerned with assuring their “integration” in advance of naturalization.²⁸ These policies act as

27. Keith Banting, “Transatlantic Convergence? The Archeology of Immigrant Integration in Canada and Europe,” *International Journal* 69 (2014): 82.

28. Ranier Baubock, Eva Ersboll, Kees Groenendijk, and Harold Waldrauch, eds., *Policies and Trends in 15 European States*, vol. 1 of *Acquisition and Loss of Nationality* (Amsterdam: Amsterdam University Press, 2006); and Sara Wallace Goodman, “Integration Requirements for Integration’s Sake? Identifying, Categorizing and Comparing Civic Integration Policies,” *Journal of Ethnic and Migration Studies* 36 (2010).

deterrents and suppress naturalization rates,²⁹ and often respond precisely to public demands for a market-like transaction whereby immigrants demonstrate their value, contributions, and qualifications before being granted membership.

What Explains Immigration Regime Development?

Instead of a move toward a more liberal, inclusive model, the demographic evidence points to reduced outlets for permanent residency or citizenship. Labor-related admissions dominate most states' immigration flows, and in many of the world's principal destinations, this migration addresses highly contingent, short-term labor needs—a reflection of an increasingly contingent global economy. Contrary to the prediction of Freeman³⁰ and others, rather than adopting the key features of settler states (open admissions, multicultural policies, and the long-term settlement of immigrants), states are returning to systems akin to the guest worker approach implemented in Western Europe in the mid-twentieth century. Yet states are pursuing this alternative vision to different extents. While elements of a model based on permanent settlement endure in places like Sweden and the United States, Gulf states like Bahrain and Kuwait epitomize the emphasis on short-term labor migration. Still others, like Canada and Australia, which once featured settler state models, have embraced numerous reforms that make migrants more contingent through strong reliance on temporary labor programs. Meanwhile, states like Japan and South Korea have steadfastly resisted the formal liberalization of their citizenship regimes while tolerating greater undocumented and temporary migration. What explains these emerging disparities?

Colonial Legacies

Some migration researchers argue that states' colonial histories influence immigration policy outputs and outcomes in a path-dependent fashion. The argument is that ties with former colonies and settler state histories contribute to a greater openness to the presence of foreigners—in light of settler states' desire to occupy indigenous people's land,³¹ and due to the obligations and industrial links in former colonial empires.³² Correspondingly, a series of quantitative studies covering different

29. Ricky Van Oers, *Deserving Citizenship: Citizenship Tests in Germany, the Netherlands, and the United Kingdom* (Leiden: Brill, 2013).

30. Freeman, "Modes of Immigration Policies."

31. Freeman, "Modes of Immigration Policies;" and Marjory Harter and Stephen Constantine, *Migration and Empire* (Oxford: Oxford University Press, 2010).

32. James T. Fawcett, "Networks, Linkages, and Migration Systems," *International Migration Review* 23 (1989); Mary M. Kritz, Lin Leam Lim, and Hania Zlotnik, eds., *International Migration*

states and time periods³³ find that colonial histories have a significant positive effect on the size of flows into major destination countries. Randall Hansen³⁴ also notes that 1962 marked a turning point in British immigration policy, when the political elites' attachment to the Commonwealth faded along with public sentiment opposing immigration. As such, the effects of colonial status on flows may be true of colonizers as well as their requisite colonies. Janoski³⁵ showed that because colonization requires concessions to the incoming population, former settler states and former colonies are the most likely to naturalize immigrants, while countries that were neither colonizers nor colonies have the lowest naturalization rates. This literature provides possible hypotheses for the variation that we observe across the thirty migration regimes that we study.

Population Aging

Immigration is widely understood to be an antidote to population aging.³⁶ However, current research on this subject matter examines immigration as a policy solution for aging rather than as a causal relationship that may be tested. Sang-Hyop Lee and Andrew Mason³⁷ contend that the admission of temporary immigrants does not specifically counteract structural aging, because migrants also age, and temporary visas mandate their ultimate departure when these migrants are no longer of working age or capacity. If immigration mitigates such aging, it is reasonable to expect aging countries to increase the scale of their admissions and, potentially, their focus

Systems: A Global Approach (Oxford: Clarendon Press, 1992); Douglas S. Massey et al., *Worlds in Motion: Understanding International Migration at the End of the Millennium*, *International Studies in Demography* (Oxford: Clarendon Press, 1998); Alessio Cangiano and Salvatore Strozza, "Foreign Immigration in Southern European Receiving Countries: New Evidence from National Data Sources," in *International Migration in Europe: New Trends and New Methods of Analysis*, ed. Corrado Bonifazi, Marck Okloski, Jeannette Schoorl, and Patrick Simon (Amsterdam: Amsterdam University Press, 2008), 167–68; and Marc Hooghe, Ann Trappers, Bart Meuleman, and Tim Reeskens, "Migration to European Countries: A Structural Explanation of Patterns," *International Migration Review* 42 (2008): 479.

33. Hooghe et al., "Migration to European Countries;" Breunig et al., "Global Migration and Political Regime Type," 851; Jack DeWaard, Keuntae Kim, and James Raymer, "Migration Systems in Europe: Evidence from Harmonized Flow Data," *Demography* 49 (2012): 1307–33; and Jennifer Fitzgerald, David Leblang, and Jessica C. Teets, "Defying the Law of Gravity: The Political Economy of International Migration," *World Politics* 66 (2014): 406–45.

34. Randall Hansen, *Citizenship and Immigration in Post-War Britain: The Institutional Origins of a Multicultural Nation* (Oxford: Oxford University Press, 2000), 244.

35. Janoski, *The Ironies of Citizenship*.

36. Juha Alho, "Migration, Fertility, and Aging in Stable Populations," *Demography* 45 (2008): 641–50.

37. Sang-Hyop Lee and Andrew Mason, "International Migration, Population Age Structure, and Economic Growth in Asia," *Asian and Pacific Migration Journal* 20 (2011): 195–213.

on economic entry, to address emerging skills gaps. Yet a number of aging societies are also among the most restrictive or xenophobic. Japan, China, and Korea do not facilitate immigration, at least formally, let alone settlement. Russia's system of governance offers visa-free entry to citizens of numerous former Soviet republics, but by insisting that they formalize their status quickly after arrival, the government effectively induces overstays and undocumented status.

Natural Resource Wealth

David Bearce and Jennifer A. Laks Hutnick³⁸ argue that resource-rich countries may prefer temporary migrants who place fewer demands on resource rents than permanent immigrants and citizens. They argue that the economic dependency on resources in such countries is better viewed not as a "resource curse" but as an "immigration curse"—that the pathologies of resource reliance stem from "labor imports related to resource production."³⁹ This is especially true in Gulf states since the oil boom of the 1970s, when these countries imported migrant workers to make up for shortfalls in the domestic population.⁴⁰ Over time, an increasing reliance on migrant labor and state subsidies has entrenched low citizen employment rates, particularly among women.⁴¹ Outside of the Gulf states, but concurrently, Canada⁴² and Australia⁴³ imported temporary migrant workers on a large scale to support natural resource development. As such, we might anticipate that the extent of resource wealth of nations could inform the percentage of labor migration, with a stronger emphasis on temporary economic migration within resource-rich countries than in other countries.

38. David H. Bearce and Jennifer A. Laks Hutnick, "Toward an Alternative Explanation for the Resource Curse: Natural Resources, Immigration, and Democratization," *Comparative Political Studies* 44 (2011): 689–718.

39. *Ibid.*, 699.

40. Sharon S. Russell, "Politics and Ideology in Migration Policy Formulation: The Case of Kuwait," *International Migration Review* 23 (1989): 24–47.

41. Andrzej Kapiszewski, "Arab Versus Asian Migrant Workers in the GCC Countries," Working Paper, United Nations Expert Group Meeting on International Migration and Development in the Arab Region, Beirut, Lebanon, 2006.

42. Jason Foster and Alison Taylor, "In the Shadows: Exploring the Notion of 'Community' for Temporary Foreign Workers in Boomtown," *Canadian Journal of Sociology* 38 (2013): 167–90; and Jason Foster and Bob Barnetson, "Exporting Oil, Importing Labour, and Weakening Democracy: The Use of Foreign Migrant Workers in Alberta," in *Alberta Oil and the Decline of Democracy in Canada*, ed. Meenal Shrivastava and Lorna Stefanick (Edmonton: Athabasca University Press, 2015).

43. Susan Bahn, "Workers on 457 Visas: Evidence from the Western Australian Resources Sector," *Australian Bulletin of Labour* 39 (2013): 34–58; and Gest, *The New Minority*, chap. 7.

Economic Freedom

We might expect that countries with liberal economic approaches would also employ liberal approaches to the governance of human movement. Inversely, destinations that are more protectionist economically may extend this protectionism to labor markets and restrict the entry of both low- and high-skilled immigrants. Economic freedom is defined here as “the freedom to benefit from the fruits of one’s labor through voluntary exchange while allowing this same right to others.”⁴⁴ While the scholarship in this area is limited, some researchers contend that economic freedom is associated with more migration flows.⁴⁵ Other researchers focusing on internal migration have corroborated these findings.⁴⁶

Welfare State Generosity

Contentious public debates often present immigration as a threat to the welfare state.⁴⁷ For this reason, the question of whether welfare state design affects immigration policy outcomes is salient not only theoretically but also practically and politically. The argument frequently presented is that welfare generosity will operate as a magnet for future immigration and therefore raise the overall volume of immigration flows.⁴⁸ While welfare state generosity is a statistically significant predictor of the size of immigration flows,⁴⁹ it is not clear if this is simply because these states are also more prosperous economies that seek to admit more immigrants.

Partisan Political Alignment of the Ruling Government

The scholarship on the relationship between partisanship and immigration policy outcomes is divided. Partisan political positions have sometimes been used to

44. Nathan Ashby, “Freedom and International Migration,” *Southern Economic Journal* 77 (2010): 51.

45. *Ibid.*

46. Richard J. Cebula and Jeff R. Clark, “Migration, Economic Freedom, and Personal Freedom: An Empirical Analysis,” *Journal of Private Enterprise* 27 (2011): 43–62.

47. George J. Borjas, “Welfare Reform and Immigration,” in *The New World of Welfare*, ed. Rebecca M. Blank and Ron Haskins (Washington: Brookings Institution, 2001), 369–90.

48. Herbet Brucker, Gil S. Epstein, Barry McCormick, Gilles Saint-Paul, Alessandra Venturini, and Claus Zimmermann, “Managing Migration in the European Welfare State,” in *Immigration Policy and the Welfare System*, ed. Tito Boeri, Gordon Hanson, and Barry McCormick (Oxford: Oxford University Press, 2002), 1–167 for an overview.

49. Tito Boeri, Herbet Brucker, Frederic Docquier, and Hillel Rapoport, eds., *Brain Drain and Brain Gain: The Global Competition to Attract High-Skilled Migrants* (Oxford: Oxford University Press, 2012), 23.

explain immigration or settlement policies, particularly across Western Europe.⁵⁰ And some scholarship identifies the restrictive effects of right-wing governments on immigration policies.⁵¹ However, this research should not suggest a unidimensional political scale with right-wing parties opposed to immigration and left-wing parties supportive of increased flows. As some scholars have argued, the traditional alliance of social democratic parties with unions (and thereby often the protection of domestic worker interests) can complicate the relationship between higher immigration flows and the liberalism of leftist ideology.⁵² Further, others argue that immigration is an area frequently met with bipartisan responses from political parties, in part because conflict over immigration might threaten incumbency.⁵³ Still others suggest that even if right-wing governments are more likely to rhetorically favor immigration restrictions than others, this ideological preference may not impact actual policy outcomes, especially if these parties are positioned within a governing coalition.⁵⁴ Recent work argues that the presence of anti-immigrant parties within the party system can lead to more restrictive immigration policies, even if they do not hold office,⁵⁵ because their appeal pressures elected parties to pander to these interests.⁵⁶

It is important to acknowledge that many of the most prominent possible drivers of migration governance are endogenous to the outcomes under examination. These potential drivers of migration include employment rates, economic growth, political stability, and democratic (or nondemocratic) rule. All these drivers factor into the migration decisions that produce the outcomes we seek to explain. Accordingly, our review only considers factors that are plausibly exogenous to migration

50. Patrick Ireland, *Becoming Europe: Immigration, Integration, and the Welfare State* (Pittsburgh: University of Pittsburgh Press, 2004); and Gallya Lahav, *Immigration and Politics in the New Europe: Reinventing Elite* (Cambridge: Cambridge University Press, 2004), 133.

51. Christoffer Green-Pedersen and Pontus Odmalm, "Going Different Ways? Right-Wing Parties and Immigrant Issues in Denmark and Sweden," *Journal of European Public Policy* 15 (2008): 367–81.

52. Linda Berg and Andrea Spehar, "Swimming Against the Tide: Why Sweden Supports Increased Labour Mobility Within and from Outside the EU," *Policy Studies* 34 (2013): 142–61; and G. Bucken-Knapp, J. Hinnfors, P. Levin & A. Spehar, "No Nordic Model: Understanding the Differences in the Labour Migration Policy Preferences of Mainstream Finnish and Swedish Political Parties," *Comparative European Politics*, 12 (2014): 598.

53. Freeman, "Modes of Immigration Policies," 884.

54. Tjitske Akkerman and Sarah L. de Lange, "Radical Right Parties in Office: Incumbency Records and the Electoral Cost of Governing," *Government and Opposition* 47 (2012): 574–96.

55. Martin Schain, "The Extreme-Right and Immigration Policy-Making: Measuring Direct and Indirect Effects," *West European Politics* 29 (2006): 270–89; and Marc Morje Howard, *The Politics of Citizenship in Europe* (New York: Cambridge University Press, 2009).

56. Joost Van Spanje, "Contagious Politics," *Party Politics* 16 (2010): 563–86.

demographic outcomes that we enumerated earlier. This is to avoid multicollinearity between the dependent variable of interest (migration regime variation) and potential explanations of this phenomenon. Ultimately, none of the explanatory hypotheses we select have been tested using cross-national, multidimensional immigration data—whether on migration policy outputs or demographic outcomes. In the following section, we explain the method by which we apply these ideas and better understand what drives the development of immigration regimes.

Methods

A significant challenge confronting the analysis of immigration regimes is their multidimensional nature. To address this, we create a taxonomy of regimes, the results of which may be analyzed as a single outcome of interest. We first assembled available data across thirty of the world's principal immigration destinations, selected based on their absolute annual flows and their absolute number of resident foreigners as a share of the national population. Our data sources include the United Nations, OECD, Gulf Labour Markets, Migration and Population (GLMM), and numerous national statistics offices. We focus on the three dimensions of immigration outcomes we review above into a unified database, including measures of:

Visa Distribution

- 1) total flow as a share of the national population
- 2) labor admissions as a share of total flow
- 3) family admissions as a share of total flow
- 4) humanitarian admissions as a share of total flow
- 5) free movement admissions as a share of total flow

Temporary Admissions

- 6) temporary labor admissions as a share of total flow

Naturalization Rate

- 7) annual naturalizations as a share of total migrant stock

Based on these seven indicators, we construct a taxonomy of immigration regimes using an unsupervised k-means clustering algorithm. K-means clustering algorithms are increasingly used within the social sciences after growing to prominence in computer science and economics to create taxonomies of people, their behavior, and their preferences.⁵⁷ We utilize this method to identify states' preferences as expressed by the outcomes across our key variables.

57. Trevor Hastie, Robert Tibshirani, and Jerome Friedman, *The Elements of Statistical Learning: Data Mining, Inference, and Prediction*, 2nd ed. (New York: Springer-Verlag, 2009), 14.3; and

Table 1. Immigration regime taxonomy across thirty countries.

Immigration Regime Taxonomy	Humanitarian Regimes Finland Sweden United States
Neoliberal Regimes Australia Canada New Zealand United Kingdom	Constrained Regimes Brazil Japan Mexico South Korea
Extra-Union Regimes Belgium France Ireland Italy Portugal Spain	Intra-Union Regimes Austria Denmark Germany Netherlands Norway Switzerland
Kafala Regimes Bahrain Kuwait Oman Saudi Arabia	Quasi-Kafala Regimes China Russia Singapore

Clustering algorithms group a collection of objects into subsets according to a common set of quantitative measurements, such that those within each cluster are more closely related to one another than objects assigned to different clusters.⁵⁸ Ultimately, this method assigns observations to subsets in such a way that, within each cluster, the average dissimilarity of the observations from the cluster mean is minimized.⁵⁹ The clustering method attempts to group objects based on the definition of similarity supplied to it, but we do not supervise anything other than the standardization of the variables' respective weights and the number of clusters in the solution.⁶⁰ This way, the data we present determine the nature of the seven-cluster taxonomy presented in Table 1.

James Honaker, "Learning Vectors for Case Study Analyses," Working Paper, Meetings of the Society for Political Methodology, Princeton University, July 2011.

58. Hastie et al., "The Elements of Statistical Learning," 501.

59. Ibid., 509. Using the k-means package in R, we set our initial configuration values to twenty-five and ran 100 iterations to ensure that the algorithm stabilized.

60. All the variables are standardized to have a mean zero and unit variance. To choose the quantity of clusters, we plotted the within-group sum of squares, but no discontinuity resulted. Consequently,

As noted, for the purposes of this article, our principal focus is on the possible explanations for the placement of countries within this immigration regime clustering solution. To evaluate the extent to which regime variation is explained by the different hypothesized social, economic, and political factors, we operationalize each of these variables.

Colonial status: In measuring this variable, we draw on data on colonial status from the Correlates of War Project⁶¹ that captures colonial status from 1816 to the present day. We used this dataset to create a scale that differentiates (i) major colonizers, (ii) minor colonizers, (iii) countries that were neither colonizers nor colonized, (iv) short-term colonies, and (v) long-term colonies. Major colonizers are those that occupied median land masses of over three million square miles (about the size of Australia or Brazil) at the peak of colonization, while minor colonizers occupied less than three million square miles of land. Among colonies, we identified the median number of years (209) that countries were colonized and used that as a point to split the data. Every country that was colonized for more than the median number of years was coded as a long-term colony; those with less than the median, as a short-term colony.⁶²

Population aging: We use information on population stock according to the age cohort of people over sixty-five-years old from the World Bank.⁶³

Economic freedom: We take the Overall Freedom Index from the Economic Freedom Index.⁶⁴ This is the most commonly used measure in the scholarship on immigration and economic freedom (e.g., Nathan Ashby⁶⁵). The higher the economic freedom score, the greater the economic freedom. The possible range of values for this index varies between 3.2 and 8.7.

Natural resource dependency: To calculate economic dependence on natural resources, we rely on World Bank⁶⁶ data on total natural resource rents as a percentage of national GDP. Given variation in this figure across time, we took the ten-year average for the period from 2004 to 2013.

we balance our desire for parsimony with our interest in accounting for nuanced differences across states in specifying the number of clusters.

61. Correlates of War Project, Colonial Contiguity Data, 1816–2016, Version 3.0.

62. For further details on coding, please see the online methodological annex, Boucher and Gest, *Crossroads*: www.crossroads.earth.

63. World Bank, “Population 65 and Above (% of total),” 2013.

64. Gwartney, James, Robert Lawson, and Joshua Hall, “Economic Freedom of the World: 2015 Annual Report,” Vancouver: Fraser Institute, 2015.

65. Nathan J. Ashby, “Economic Freedom and Migration Flow Between U.S. States,” *Southern Economic Journal* 73 (2007): 677–97; and Ashby, “Freedom and International Migration,” 49–62.

66. World Bank, “Population 65 and Above (% of total),” 2013.

Welfare state generosity: We took the Combined Generosity Welfare Index from the Comparative Welfare Entitlements Dataset.⁶⁷ This variable measures the average generosity across the major possible welfare payments and considers actual welfare usage data.⁶⁸ This variable has been used in many studies on the welfare state.⁶⁹ These data are available only for OECD states.

Partisan Political Alignment: The Comparative Political Data Set (CPDS III) constructs an index from one to five that measures the partisan composition of the executive governing cabinet⁷⁰ that has been used in a number of studies.⁷¹ Under this approach, one equates to the dominance of a right-wing party and five to the dominance of a left-wing party. To capture ideological oscillation over time, we took the average position from 2003 to 2012—the decade preceding our observations (nearly all of which are from 2011, the latest of which is from 2013). This also assists in capturing the path-dependent effects of previous governing parties on present migration outcomes. These data are only available for OECD states.

In ideal circumstances, the availability of such datasets would permit regression analysis to determine the extent to which they drive the taxonomic variation. However, because countries are our units of analysis, we are ultimately working with thirty observations. This small number of outcomes makes reliable regression results impossible.⁷² Instead, we measure bivariate correlations by plotting country-level

67. Lyle Scruggs, Detlef Jahn, and Kati Kuitto, *Comparative Welfare Entitlements Dataset 1970–2011*, at <http://cwed2.org/>.

68. Lyle Scruggs, “Social Welfare Generosity Scores in CWED 2: A Methodological Genealogy,” Comparative Welfare Entitlements Dataset Working Paper 01, February 2014.

69. Catherine Bolzendahl, “Directions of Decommmodification: Gender and Generosity in 12 OECD Nations,” *European Sociological Review* 26 (2010): 125–41; Barbara Vis, *The Politics of Risk-Taking* (Amsterdam: Amsterdam University Press, 2010); Bo Rothstein, *The Quality of Government: Corruption, Social Trust, and Inequality in International Perspective* (Chicago: University of Chicago Press, 2011); and Richard Easterlin, “Happiness Growth and Public Policy,” *Economic Inquiry* 51 (2013): 1–15.

70. Klaus Armingeon, Christian Isler, Laura Knopfel, David Weisstanner, and Sarah Engler, *Comparative Political Data Set (CPDSIII) 1960–2012* (Bern: Institute of Political Science, University of Berne, 2013), 3.

71. Romana Careja and Patrick Emmenegger, “The Politics of Public Spending in Post-Communist Countries,” *East European Politics and Societies* 23 (2009): 165–84; Nathalie Giger and Moira Nelson, “The electoral consequences of welfare state retrenchment: Blame avoidance or credit claiming in the era of permanent austerity,” *European Journal of Political Research* 50 (10): 1–23; Albert Falco-Gimeno and Ignacio Jurado, “Minority Governments and Budget Deficits: The Role of the Opposition,” *European Journal of Political Economy* 23 (2011): 554–65; and Roel Beetsman, Massimo Giuliodori, Mark Walschot, and Peter Wierdsma, “Fifty Years of Fiscal Planning and Implementation in the Netherlands,” *European Journal of Political Economy* 31 (2013): 119–38.

72. With so few cases, we experience the convergence of maximum likelihood estimators if we estimate country placement in clusters using a multinomial logit model; and high-standard

measures of each explanatory factor and examining the extent to which they vary by cluster. Greater explanatory power is suggested by factors displaying less variation within each cluster grouping and more variation across each cluster grouping.

Correlation Results

Colonial Legacies

In Figure 4, we plot mean colonial history observations cluster by cluster. The x-axis is an ordinal scale of colonial status from colonizers through to long-term colonized status, while the y-axis contains the various regime types.⁷³ From our results, the consideration of the varying duration and territorial mass of colonization is helpful in understanding variation across some, but not all, regime types. For instance, a lengthy British colonial history is consistent across Australia, Canada, and New Zealand. British Empire is a unifying feature of these states that are also clustered with the United Kingdom itself. This finding corresponds with the work of Marc Hooghe and his collaborators,⁷⁴ who identify the strong effects of British colonial status on the size of immigration inflows in affected countries. While the United Kingdom, as a colonizer rather than a colony, might appear as an anomaly in its placement within a number of former settler states, it is important to note that this placement is driven by its comparatively high percentage of permanent economic immigration and accompanying family migration. Similarly, the noncolonial status of the Arab states appears to explain regime placement for members of that group. Although they were once protectorates of the British Empire, the absence of official colonial history (either as colonizer or colonized) appears to matter as much as its presence for understanding regime clustering.

Demographic Aging

Looking at Figure 5, the x-axis reflects the percentage of the domestic population that is over sixty-five years old, while the y-axis contains the regime cluster types. While

errors result (and possible omitted variable bias) if we dichotomize taxonomic outcomes and employ a linear probability model (OLS). See Joshua D. Angrist and Jorn-Steffen Pischke, *Mostly Harmless Econometrics: An Empiricist's Companion* (Princeton, NY: Princeton University Press, 2009); and Jeffrey M. Wooldridge, *Introductory Econometrics: A Modern Approach* (Boston, MA: Cengage Learning, 2013).

73. Boucher and Gest, *Crossroads*. See the online appendix for further details: <https://crossroads.earth>.

74. Hooghe et al., "Migration to European Countries," 492–93.

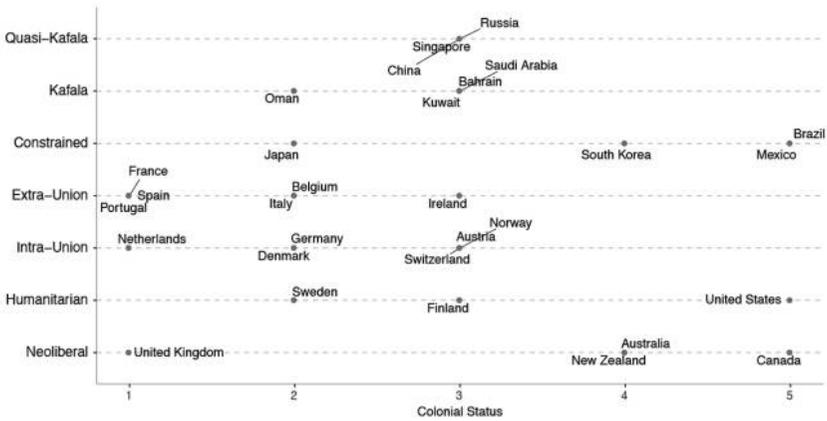


Figure 4. Colonial legacies and regime clustering results

some clustered countries share similar aging profiles, there is insufficient variation to suggest that countries become more open to immigration or naturalization as their domestic population ages. When examining populations over sixty-five years old across the case countries (Figure 5), there is considerable variation across and within each of the regime clusters. For some clusters, there does seem to be a relationship between demographic aging and population clustering. For instance, Australia, Canada, New Zealand, and the United Kingdom all have similar levels of population aging, ranking them relatively young among the OECD states. This is a product both of higher fertility rates than other OECD countries and higher relative

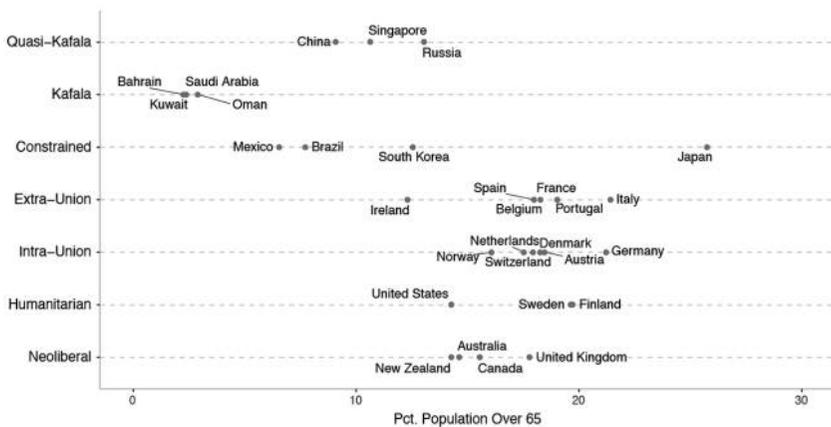


Figure 5. Aging and clustering results

levels of immigration.⁷⁵ The Gulf states feature younger populations but also high rates of immigration. In contrast, the relatively young population of Mexico contrasts with Japan—one of the world’s fastest aging populations that is also increasingly reliant on migrant labor for the provision of care workers.⁷⁶ For the remaining regimes, the clustering is spread across the aging spectrum, again suggesting that this variable is not a key explanation for regime clustering for most of the countries in our dataset.

Economic Freedom

In Figure 6, countries are distributed according to their economic freedom scores (x-axis) and regime placement (y-axis). The scores range from 6.3 (Brazil) to 8.5 (Singapore). The Commonwealth states all have quite high scores (more economic freedom), while Brazil, Japan, Korea, and Mexico have a mix of lower scores (less economic freedom). The largest variation exists among China, Russia, and Singapore, three autocracies with varying levels of state restrictions over economic freedom. The other regime types are more closely positioned in the middle of the spectrum. The central argument made by proponents of an economic freedom approach is that greater economic freedom will permit the recruitment of greater numbers of immigrants.⁷⁷ However, considering the countries with the highest immigrant stock as a percentage of population (the Arab regimes), the economic freedom scores are mixed and, indeed, are not as high as the Commonwealth states that have lower migrant stocks proportionate to population size. As such, while these bivariate correlations do suggest that some of the countries with higher immigrant stock shares (Australia, Canada, New Zealand, and Switzerland) also feature higher economic freedom scores, this is not true of all countries with this attribute.

Natural Resource Dependency

Figure 7 plots the percentage of overall GDP comprised of natural resource rents on the x-axis, correlated with regime clusters on the y-axis. Given other scholars’ assertions about the effect of resource wealth on immigration governance in the Gulf states,⁷⁸ we hypothesized that this might also be true for other resource-rich

75. United Nations Population Division (UNPD), “Migrants by Origin and Destination: The Role of South-South Migration,” *Population Facts*, June 2012.

76. David Green, “As Its Population Ages, Japan Quietly Turns to Immigration,” Migration Policy Institute, March 28, 2017.

77. Ashby, “Freedom and International Migration,” 49–62.

78. Russell, “Politics and Ideology in Migration Policy Formulation,” 3; John Chalcraft, “Monarchy, migration and hegemony in the Arabian Peninsula,” Kuwait Programme on Development,

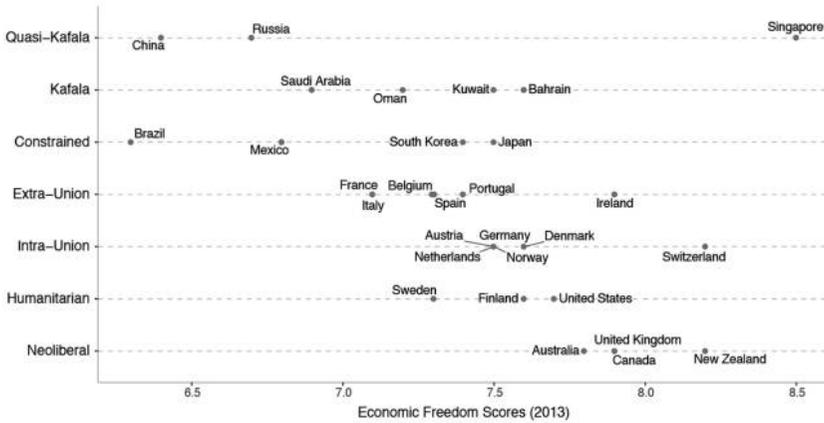


Figure 6. Economic freedom and regime clustering results

migration destinations. When we examine Figure 7, however, it is apparent that resource wealth is rare, and most countries are bunched accordingly with low levels of GDP generated on this basis. For the countries where resource wealth is higher, we still observe substantial variation in the percentage of GDP comprised by natural resources, ranging from 14% in Bahrain to over 40% in Oman, Saudi Arabia, and Kuwait. Elsewhere, natural resources are important for Russia (27%) but less so for Singapore (0%) and China (6%). As such, neither the presence nor absence of natural resources appears to be the factor uniting this latter cluster. Among the other regimes, there is less variation on this factor, as most countries do not demonstrate high natural resource scores. Norway is an outlier. In short, natural resource rents do not appear to be an important factor that drives regime development outside the Arabian Peninsula.

Welfare State Generosity

Figure 8 plots the welfare state generosity of OECD countries on the x axis and regime clusters on the y axis. Looking first at welfare state generosity among the OECD states, it is clear that Commonwealth countries have fairly similar, low levels of total generosity. This is consistent with common typologies of these countries as liberal welfare states.⁷⁹ Furthermore, the low level of welfare support from

Governance and Globalisation in the Gulf States, (London: London School of Economics and Political Science, 2010), 12; and Philippe Fargues, “Immigration without Inclusion: Non-nationals in Nation-Building in the Gulf States,” *Asian and Pacific Migration Journal* 20 (2011): 273–92.

79. Gosta Esping-Andersen, *The Three Worlds of Welfare Capitalism* (Princeton, NJ: Princeton University Press, 1990).

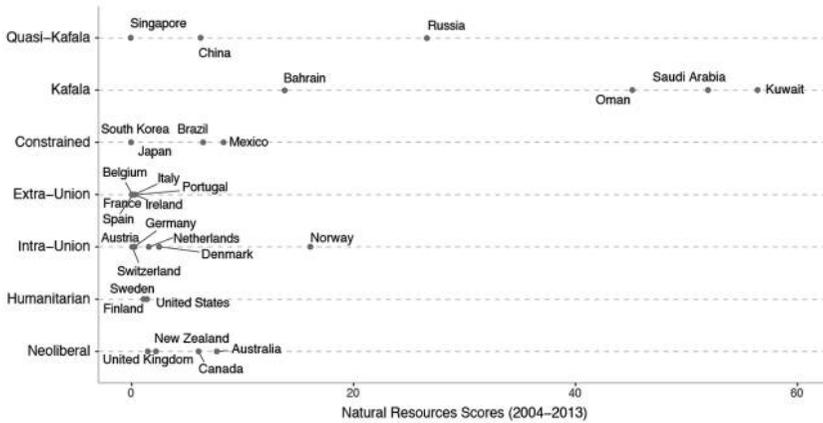


Figure 7. Natural resources and regime clustering results

the state for migrants in these countries also interacts with the economic focus of the immigration programs that aim to bring in self-sufficient, labor-market-ready individuals.⁸⁰ Welfare state scholars have argued that officials in generous welfare states sometimes manage the magnet effect of generous welfare provision through concomitant immigration and welfare restrictions.⁸¹ Countries that are party to free mobility pacts may see these internal migrants as job-seekers who will be less reliant on the welfare states of their host societies. However, for the other regime clusters, no coherent pattern is apparent along the total welfare generosity scores.

80. Justin Gest, Anna Boucher, Suzanna Challen, Brian Burgoon, Eiko Thielemann, Michel Beine, Patrick McGovern, Mary Crock, Hillel Rapoport, and Michael Hiscox, "Measuring and Comparing Immigration, Asylum, and Naturalization Policies Across Countries: Challenges and Solutions," *Global Policy* 5 (2014): 261–74; and Anna Boucher and Terry Carney, "Social Security for Migrant Workers and Their Families in Australia," in *Social Security and Migrant Workers: Selected Studies of Cross-Border Social Security Mechanisms*, ed. P. Arellano Ortiz, R. Blanpain, M. Olivier, and G. Vonk (Zuidpooslingel: Kluwer, 2013).

81. Keith Banting, "Looking in Three Directions: Migration and the European Welfare State in Comparative Perspective," in *Immigration and Welfare: Challenging the Borders of the Welfare State*, ed. Michael Bommes and Andrew Geddes (London: Routledge, 2000); Keith Banting, "The Multicultural Welfare States: International Experience and North American Narratives," *Social Policy & Administration* 39 (2005): 98–115; Michael Bommes, "National Welfare State, Biography, and Migration: Labour Migrants, Ethnic Germans, and the Re-ascription of Welfare State Membership," in *Immigration and Welfare: Challenging the Borders of the Welfare State*, ed. Michael Bommes and Andrew Geddes (London: Routledge, 2000), 90–108; Andrew Geddes, "Denying Access: Asylum Seekers and the Welfare Benefits in the UK," in *Immigration and Welfare: Challenging the Borders of the Welfare State*, ed. Michael Bommes and Andrew Geddes (London: Routledge, 2000), 134–47; and Qingwen Xu, "Globalization, Immigration, and the Welfare State: A Cross-National Comparison," *Journal of Sociology and Social Welfare* 34 (2007): 87–106.

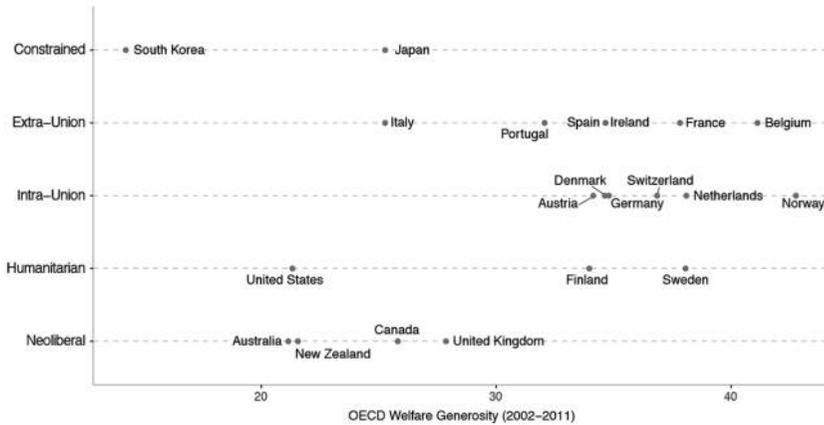


Figure 8. Welfare state generosity and regime clustering results

Partisan Political Alignment

Turning to the influence of partisan politics on migration outcomes, there is no clear relationship between executive position and regime placement. As is clear from Figure 9, which plots executive regime placement on the x-axis and regime placement on the y-axis, the OECD countries presented here demonstrate substantial variation along this index, although Denmark, Switzerland, Austria, and Germany deviate the least in light of the dominance of center and right-wing parties over this period. Even for the Commonwealth states that we might recently associate with more right-leaning governments,⁸² we see variation along the measure of partisan position that we employ. The United States, Finland, and Sweden group a classically right-dominated party system with two social democratic nations. While a number of Central European states cluster toward the right end of the spectrum, there is no overwhelming pattern that emerges.

In short, there is no strong correlation between partisanship and regime clustering. In some respects, this is not surprising. While the scholarship suggests that partisanship may influence the rhetoric around government immigration programs, evidence that these discourses in turn shape actual immigration outcomes is more limited. There are two reasons why this might be the case. First, while high-profile dog-whistling by politicians can suggest hard-line immigration policies, governments can also be stymied by political factors, implementation gaps, or supranational laws. Immigration scholars have referred to this phenomenon as “control

82. Esping-Andersen, *The Three Worlds*; and Francis Castles and Deborah Mitchell, “Identifying Welfare State Regimes: The Links Between Politics, Instruments, and Outcomes,” *Governance* 5 (1992): 21.

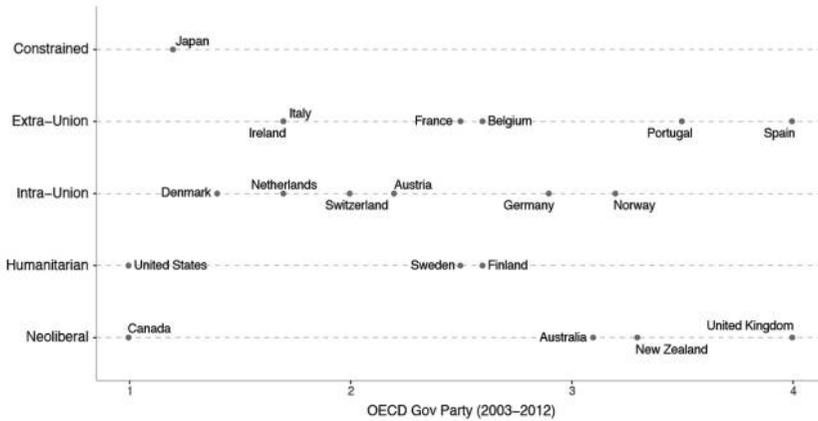


Figure 9. Executive party position means and regime clustering

dilemmas,”⁸³ whereby governments may publicize their efforts to control immigration in one area, often through border security, in order to distract attention from initiatives that fail to produce the intended outcomes elsewhere. Second, governments may have contradictory perspectives on immigration that result in countervailing outcomes. For instance, right-wing governments can create rhetoric of low immigration to appease xenophobic electorates but at the same time promote high rates of immigration to support business interests.

A Segmented Theory of Immigration Regime Variation

From this examination of these six prominent explanatory hypotheses, several factors drive immigration regimes cross-nationally—a finding consistent with the common rejection of a “grand theory” within migration studies. As Russell King has argued, instead of a single overarching explanation for understanding migration, we might instead opt for “a range of interlocking theoretical perspectives which, assembled in various combinations, leads us towards a greater level of understanding of the nature and complexity of migration than earlier simplistic theorisations.”⁸⁴

83. Virginie Guiraudon and Christian Joppke, *Controlling a New Migration World* (London: Routledge, 2001), 12–13; and Chris Wright, “How Do States Implement Liberal Immigration Policies? Control Signals and Skilled Immigration Reform in Australia,” *Governance* 27 (2014): 397–421.

84. Russell King, “Theories and Typologies of Migration: An Overview and a Primer,” Willy Brandt Series of Working Papers in International Migration and Ethnic Relations 3/12, Malmo Institute for Studies of Migration, Diversity, and Welfare (MIM), Malmo University, Sweden, 2012, 31.

A segmented theory of immigration regime development is more appropriate for understanding regime clustering, whereby different explanations apply for different regime clusters. The Gulf regimes are all relatively young, resource-rich, autocratic countries. Regimes that nearly exclusively admit labor migrants on temporary visas, with little to no naturalization, are produced by societies in which membership comes with access to enormous government subsidies fueled by natural resource rents. Accordingly, citizenship is carefully guarded as well. However, the dependence on natural resources also produces large-scale underemployment among citizens who are unmotivated to work, despite great demand for economic and infrastructural development.⁸⁵ To accommodate this, these regimes have the greatest stocks of migrants in the world proportionate to their population. The discretion and aversion to naturalization also appears related to the absence of extended colonial legacies that have, in other countries, imposed a sense of obligation to admitting and naturalizing people from former overseas territories. In contrast, the Gulf regimes act as free agents, contracting highly contingent labor for short periods from primarily non-Arab populations targeted for their presumed servility and low sense of entitlement among immigrant populations. China, Russia, and Singapore also have authoritarian governments and have similarly made the choice to pursue immigration models with low naturalization, high rates of temporary immigration, and an economic focus.

Free movement across the European Union constrains the range of immigration policy options that European regimes can employ. Membership in a free movement agreement typically results in the preference of citizens from other member states in lieu of immigrants from elsewhere in the world. This necessarily shrinks the share of labor and family admissions programs inside of these unions because free movement migrants may be employed to fill most labor gaps, and any subsequent family migration is also classified as further free movement. Naturally, this has produced great convergence in the profile of regimes subject to free movement. The bifurcation appears at least in part to be a vestige of colonial relationships, which lead countries like Belgium, France, and the Netherlands to exhibit more heterogeneous visa distributions and more diverse migrant stock. It may also be a matter of economic freedom and prosperity. Countries like Italy, Portugal, and Spain tend

85. Nasra Shah, Makhdoom Shah, and Zoran Radovanovic, "Patterns of Desired Fertility and Contraceptive Use in Kuwait," *International Family Planning Perspectives* 24 (1998): 133–38; and United Nations Development Program Kuwait (UNDP Kuwait), "UNDP Jobs-24608-Consultant to Develop a National Youth Strategy for the State of Kuwait," United Nations Development Programs Jobs, 2011.

to send free movement migrants, rather than receive them, and subsequently need to recruit externally from their former colonies.⁸⁶

The cluster of Australia, Canada, New Zealand, and the United Kingdom emerges as a by-product of shared Commonwealth norms that have sharpened their admissions focus over time. Indeed, in many ways, their historic openness and liberalism that once stood in contrast to the relatively draconian Gulf regimes has inspired immigration regimes that reflect several Gulf-regime attributes—a heavy focus on temporary visas and visas dominated by labor admissions. The primary distinction is the former settler states’ highly discretionary approach to labor admissions, focused on the recruitment of highly skilled individuals who are deemed to merit naturalization, which is rarer in the Gulf, alongside high naturalization rates. This neo-liberal approach is precisely the kind that United States policymakers have been contemplating for the last two decades but have been unable to pass as a result of congressional politics. Despite the objectives of the remaining centrists in American government and the large quantity of undocumented immigrants, the United States otherwise endures as a relic of its settler state past.

Finally, Brazil, Japan, Korea, and Mexico have similar immigration demographic outcomes but arrive at that similarity via different paths. In particular, the constrained nature of the Japanese and South Korean regimes is a product of self-imposed restrictions by governments seeking to appease publics that oppose immigration. On the other hand, Mexico and Brazil’s constrained outcomes are a product of less demand for entry into their less developed economies, rather than any form of government control.

An Admissions-Citizenship Nexus

The segmented theory we develop to explain cross-national variation in immigration governance suggests the existence of alternative logics. This appears to extend to the way that governments (consciously or subconsciously) understand the relationship between admission and citizenship—different aspects of the immigration process that are conventionally examined separately.⁸⁷ Until now, this discrete treatment of immigration and integration policies and outcomes has produced

86. Outlying European member states like Finland and Sweden made deliberate choices to admit more humanitarian or family migrants, and the United Kingdom has made the deliberate choice to pursue highly selective skilled labor recruitment, much like the former settler states with which it is clustered.

87. Tomas Hammar, “Introduction,” in *European Immigration Policy: A Comparative Case Study*, ed. Tomas Hammar (Cambridge: Cambridge University Press, 1985), 1–13.

partial renderings of immigration regimes.⁸⁸ However, our segmented understanding suggests four trends.

First, very high flows of immigrants lead states to place restrictions on access to membership due to the thinner distribution of resources to migrants and citizens across the board that such high admissions would imply. Such an argument is consistent with the finding of Martin Ruhs⁸⁹ that there is a trade-off between high admissions of migrants and the rights conferred on such individuals, including their rights of membership. Furthermore, and peculiar to the Gulf countries, state reliance on resource rents, not only to support public welfare but also to appease citizens, means that governments have a stronger incentive to limit immigrants' access to public goods. The most common way to achieve this is to restrict the number of permanent visas available or to erect barriers to naturalization.

Second, high rates of free movement, as seen in some European Union states, appear correlated with moderate rates of naturalization. This is because EU citizens enjoy relative parity of access to benefits across the member states⁹⁰ or may not reside in the destination country for a period of time sufficient to warrant naturalization. As such, free movement immigrants may experience less motivation to naturalize.

Third, high humanitarian and family flows correspond with higher naturalization rates. Humanitarian and family reunification immigrants have stronger motivations to remain (to evade danger or remain with loved ones) than economic entrants. There are some important exceptions here, such as the Temporary Protected Status provided with great discretion by the United States and Temporary Protection Visas at certain times in Australia—both of which ultimately require repatriation by humanitarian migrants once the risk of persecution subsides. Short-term family visas, such as the Canadian Super Visa for aged parents, offer another counterexample and are becoming increasingly popular with governments precisely due to the reduced state burdens that they represent. However, family and humanitarian visas are generally provided on a permanent basis, and countries that emphasize these in their visa distribution like the United States, Sweden, and France have correspondingly elevated naturalization rates.

Fourth, the combination of high economic migration (both temporary and permanent) and high naturalization occurs in those countries where there is also

88. Martin Schain, "On Models and Politics," *Comparative European Politics* 10 (2012): 369–76.

89. Martin Ruhs, *The Price of Rights: Regulating International Labor Migration* (Princeton, NJ: Princeton University Press, 2013).

90. Alan Barrett and Bertrand Maitre, *Immigrant Welfare Receipt Across Europe: Discussion Paper No. 5515* (Bonn: IZA Institute of Labor Economics, 2011).

a strong focus on skilled immigration. This is because, in these contexts, immigration selection policies act as a method to rigorously preselect those immigrants for both entry and membership. In the Commonwealth states, where this pattern is most common, we observe a shift toward temporary economic admission that further restricts access to naturalization over the longer term.⁹¹ As such, so long as their stocks are sustained, the high naturalization rates in places like Australia, New Zealand, and the United Kingdom may see reductions in future years.

New Directions

Gary Freeman's 1995 article in the *International Migration Review* predicted the movement of a variety of Western immigration-receiving states toward a liberal, settler state model. The end of the Cold War and the power of groups with a vested interest in large-scale flows, he argued, would precipitate both a more liberal trend in immigration and convergence in the way immigration states approach the selection and incorporation of immigrants. While this may have appeared to be the most likely outcome at the time when Freeman's article was published, policy developments since then have been less liberal and more diverse than originally predicted. From our analysis of admissions and naturalization data across thirty of the world's most prominent immigrant destinations, we find that these states are pursuing immigration regimes focused on temporary labor admissions, with few outlets to citizenship. While even historically archetypal settler states like Australia, New Zealand, and Canada are converging to this global trend, there is still significant variation in governance attributable to multiple factors. These empirical facts challenge a singular teleological development toward a liberal model. In contrast, we outline a segmented theory of immigration regime development. One potential way of harmonizing this segmentation may be to view immigration governance as responsive to a "hierarchy of needs" generated by the presence of certain drivers and not others. To elaborate:

- 1) It is impossible for any country to facilitate extensive permanent settlement while also redistributing massive natural resource rents to its national population.
- 2) In the absence of such natural resource rents, imperial histories appear to produce regimes that admit more migrants outside of regional free movement arrangements.

91. Gest, *The New Minority*; and Dauvergne, *The New Politics of Immigration*.

- 3) Colonial histories appear to produce path dependencies that facilitate permanent settlement and citizenship.
- 4) In the absence of natural resource dependency and imperial or colonial histories, we see that countries with liberal economic approaches tend to allow substantial immigrant admissions and settlement.
- 5) Alternatively, states with centralized control of their economies place greater conditions on admissions and restrictions on permanent settlement.

Such a schema is limited by a lack of complete data across more years, which limits the scope of our current conclusions to a single point in time. Future analyses may replicate ours as fresh data become available over more years and from more countries of destination. An examination of other countries is likely to reveal other approaches to governance. For example, while no reliable data exists, a number of sub-Saharan African states principally attract humanitarian migrants. Alternatively, Israel uniquely admits migrants of Jewish heritage, creating a system of governance stratified by ethnicity and religion. Further, erratic developments in Latin America mean that flows will vary from government to government and year to year. The consideration of other cases may also yield new hypotheses about what determines the development of regimes across space and time. We hope the advances reported in this article reinvalidate a conversation that Gary Freeman and others began a quarter-century ago.

Justin Gest is an Associate Professor of Policy and Government at George Mason University's Schar School of Policy and Government. He is the author of five books including *The New Minority: White Working Class Politics in an Age of Immigration and Inequality* (2016) and *Crossroads: Comparative Immigration Regimes in a World of Demographic Change* (2018, with Anna Boucher); He also co-edits the Oxford University Press book series, "Oxford Studies in Migration and Citizenship." In 2007, he co-founded the Migration Studies Unit at the London School of Economics. He can be reached at jgest@gmu.edu.

Anna K. Boucher is an Associate Professor of Public Policy and Comparative Politics at the University of Sydney. She is the author of *Gender, Migration and the Global Race for Talent* (Manchester University Press, 2016), *Crossroads: Comparative Immigration Regimes in a World of Demographic Change* (2018, with Justin Gest) and numerous peer-reviewed articles. In 2007, she co-founded the Migration Studies Unit at the London School of Economics. She can be reached at anna.boucher@sydney.edu.au.