

DISAGGREGATING OPPOSITION TO IMMIGRATION

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Why do voters in Western countries oppose immigration and support populist politicians who promise stop or reverse the flow of foreigners into their country? In the age of Donald Trump, there is a common narrative that asserts that they are driven by xenophobia and prejudice, or are members of a formerly dominant ethnic community who feel threatened by demographic and cultural change. This narrative is of course true to varying degrees in different developed countries: Trump, Orban, Wilders, or the Brexiteers have all made statements or pursued policies that could be construed as reflecting ethnic prejudice if not outright racism.

But it would be a mistake to construe opposition to immigration monolithically. There are a number of reasons for being skeptical about current immigration policies in the developed world, some of which are more legitimate than others. There is of course a core of voters who are racist and xenophobic. But there are also at least three other major objections to immigration that are adduced in the current debate: the first points to the illegality of immigration rather than immigration per se; the second concerns the potentially unsustainable strain high levels of immigration place on a society's social services; and the third focuses on fears that immigrants or their children will not eventually assimilate into their society's dominant culture.

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There is survey data indicating the relative strength of these concerns [EMPIRICAL DATA TK]. However, there is some reason to be skeptical about the reasons people give for their opposition to existing immigration policies: social desirability bias may, for example, cause people to cite illegality as a motive when they are actually motivated by racism.

It is, however, important to try to disaggregate these motives to the extent possible, for two reasons. First, some of these concerns are in fact real ones: if a certain level of immigration throws education or health budgets into fiscal crisis, or if immigrant communities pose real challenges to security or to a liberal democracy's core values, then these problems need to be addressed for their own sake. The second reason is political: populist politicians pose a serious threat to liberal institutions; if they are to be stopped, opponents need to undercut their bases of support. If that support is simply based on racism, then there is no choice but to firmly oppose them on principle. On the other hand, if some of their supporters are voicing legitimate grievances, then a democracy needs to take their concerns into account. In doing so it might be possible to chip away at the populist base of support.²

The remainder of this paper will provide the economic, political, and social/cultural context surrounding the issues of illegality, assimilation, and sustainability, that might serve to guide future policy in these areas.

ILLEGAL IMMIGRATION

² There was a real world instance of a centrist politician successfully following this strategy. When Nicolas Sarkozy was France's Minister of the Interior from 2002-2004, he implemented a comprehensive crackdown on violent crime. Given the correlation that exists in France between crime and immigrant status, he was bitterly criticized by the left for following a racist policy. However, crime was in fact a serious issue plaguing many working-class communities in France, and serious anti-crime efforts helped to some extent to take the wind out of the sails of the National Front in this period.

The argument is sometimes made that, given globalization and the disparities between rich and poor countries in the modern world, it is simply unrealistic to think that developed countries can stop the flow of people into their societies. This is true if "stopping" implies completely blocking the flow of a certain class of foreigners. Nonetheless, as Table 1 indicates, levels of foreign-born populations differ widely between OECD countries. While geography contributes to the variance between countries, it is clear that policy plays a large role compared in determining levels.

The United States currently hosts an estimated 10-11 million undocumented aliens. Donald Trump and much of the anti-immigrant right believes that most of these people crossed the border from Mexico, and that the illegal immigration problem could be solved by building Trump's "big, beautiful wall." However, the issue has never been lack of a physical barrier to entry, but rather the internal politics of enforcement.

The reason that a wall would not solve the illegal immigration problem is that a very large number of undocumented aliens in the US did not cross the border illegally, but are visa overstayers who entered the country legally but remained once their visas expired. The US currently has no system for tracking these people, and therefore no way of even estimating the size of the problem. There are estimates, however, that visa overstayers have substantially outnumbered border crossers since 2007, and constitute a majority of the undocumented population.³

While an impregnable wall might reduce the number of border-crossers, any number of studies of the problem have pointed to employer sanctions as

³ See the Robert Warren and Donald Kerwin, "The 2,000 Mile Wall in Search of a Purpose," *Journal on Migration and Human Security*, 2017 (<http://cmsny.org/publications/jmhs-visa-overstays-border-wall/>); Vivian Yee, Kenan Davis, and Jugal K. Patel, "Here's the Reality About Illegal Immigration in the United States," *New York Times*, March 6, 2017.

the most effective way in which immigration laws could be enforced.⁴ Employer sanctions were part of the deal underlying the 1986 Immigration Reform and Control Act (IRCA), which also gave existing undocumented aliens a path to citizenship. There were, however, a number of political obstacles to making the sanctions work. First and foremost, American employers themselves strongly resisted these measures, partly because they had powerful economic incentives to continue hiring the undocumented, and because they did not want to assume the enforcement burden. Second, many pro-immigrant groups began to challenge the sanctions as discriminatory, and succeeded in weakening them through the courts.⁵ And finally, Americans have never been able to agree on a national ID system like those used in other developed democracies to verify who is legally in the country. Opposition to this is shared between the left and right: the former believes a national ID will be used to discriminate against racial and ethnic minorities, and the latter are too suspicious of the powers this would give the federal government. Any system of employer sanctions today would have to make use of E-Verify, an imperfect system built on state-level drivers licenses. The constraints on migration enforcement in the US thus are not technical but political; successful policy in this area will require overcoming these political obstacles.

In Europe, the problem is somewhat different. A great deal of migration within the European Union is legal, and indeed is encouraged through the Schengen agreement and other measures promoting the free movement of labor. The problem that was revealed during the 2014 migrant crisis concerned the EU's external borders, which were largely unpoliced and which permitted the entry of over a million refugees from Syria alone. The main migration routes are through the south via Greece and Italy; in 2014 these

⁴ See for example the Brookings-Duke Immigration Policy Roundtable, *Breaking the Immigration Stalemate: From Deep Disagreements to Constructive Proposals* (Washington, DC: 2009).

⁵ Jacobson, David, *Rights Across Borders: Immigration and the Decline of Citizenship* (Baltimore and London: Johns Hopkins University Press, 1996).

migrants moved northward through Hungary, Austria, Slovakia, the Czech Republic, and other eastern European countries on their way to Germany, France, or the United Kingdom. This provoked a huge backlash and prompting many of these countries to construct physical barriers to movement from the south.

Critics of immigration like Viktor Orban charge that Europe cannot have open inner borders if its external borders are not secure; while his motives are malign, he is correct in this assertion. Angela Merkel tried to solve this problem by in effect bribing Turkey to keep migrants bottled up there. This temporarily eased the Syrian refugee problem, but left unsolved pressure from migrants from other places like sub-Saharan Africa. The European agency tasked to deal with the EU's southern maritime border, Frontex, is underfunded, understaffed, and lacks the capacity to control the flow of migrants into Italy and Greece.⁶ As a result, migrants continue to pile up in the Greek islands, on Italy's Lampedusa island or other parts of southern Italy. In light of this unsolved problem, it is not surprising that Italians voted in 2018 for two populist parties, both of which have made hostility to Europe centerpieces of their programs.

ASSIMILATION

Some of the most legitimate concerns about the levels and nature of immigration today center around worries that immigrants or their descendants will not ultimately assimilate into the democratic society of which they are members. This concern was most acute vis à vis Muslim immigrant communities in Europe, where a series of terrorist attacks began in the period after September 11, 2001, and continued with a continuing wave of incidents growing out of the Syrian civil war. Many of the perpetrators of these attacks were citizens of the countries where they occurred, and/or second-generation

⁶ One of the countries blocking greater authority for Frontex is Hungary, a highly hypocritical stance given its own position on internal migration.

children of immigrants. It was clear that Europe was harboring populations of angry Muslims, some of whom had not accepted the basic bargain of citizenship. Apart from terrorism, Muslim communities engaged in social practices that challenged core norms of liberal democracy in ways that immigrants from other parts of the world did not. Many Muslim families, for example, arranged the marriages of their daughters, potentially contravening the rights of the young women to choose their own partners; some unlucky ones who disobeyed became the targets of honor killings. Many observant Muslims disapproved of homosexuality, at a time when gay marriage was spreading like wildfire across Europe. And, as a result of the bitter Israeli-Palestinian conflict, many Muslims displayed a kind of anti-Semitism that Europe had been vigilant in suppressing since the end of the Second World War.

Many opponents of immigration have placed the blame for the failure of assimilation on the immigrants themselves, saying that they did not want to become members of the societies in which they were living. Assimilation is a two-way street, however; the receiving societies themselves created obstacles to successful integration of newcomers.

The first concerned rules for citizenship. Citizenship can be granted at birth on the basis of *jus soli* or *jus sanguinis*, or it can be acquired after birth through naturalization. Under *jus soli*, anyone born on the country's territory automatically became a citizen; under *jus sanguinis*, citizenship depends on descent.⁷ The United States with its long tradition of immigration has always had a tradition of *jus soli*, though the right of African-Americans to be citizens had to be reaffirmed in the 14th Amendment with its reference to all "persons" born or naturalized in the United States.

⁷ T. Alexander Aleinikoff and Douglas B. Klusmeyer, eds., *From Migrants to Citizens: Membership in a Changing World* (Washington, DC: Carnegie Endowment for Intl Peace, 2000), pp. 1-21; Gerhard Casper, "The Concept of National Citizenship in the Contemporary World: Identity or Volition?" (Hamburg: Bucerius Law School, 2008).

In Europe, the French have a long history of thinking of citizenship in political and territorial terms; though technically practicing *jus sanguinis*, their relatively easy terms for naturalization has permitted the almost automatic acquisition of citizenship for second- and third-generation immigrants.⁸ French nationality has been defined as loyalty to the Republic, French language, and a French education. Germany, Austria, Switzerland (as well as Asian democracies like Japan and South Korea) have by contrast traditionally based citizenship on *jus sanguinis*, and have made naturalization difficult to obtain. Before Germany's laws were somewhat liberalized in 2000, second and third generation children of immigrant parents from Turkey or other Middle Eastern countries speaking perfect German could obtain citizenship only with great difficulty. By contrast, ethnic Germans from the former Soviet Union and other Eastern bloc countries could be naturalized on proof of German ethnicity, even if they spoke no German. Japan has one of the most restrictive systems of citizenship and naturalization of any developed democracy, as well as sharp limits on immigration, with the result that it one of the least diverse of any OECD country.⁹

Individual European countries began reforming their citizenship laws in the 2000s.¹⁰ In some respects these changes were helpful to social integration, shifting away from a *jus sanguinis* and establishing a set of criteria for naturalization that could be plausibly met by an aspiring immigrant. New citizens were expected to demonstrate knowledge of Dutch or

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

⁹ Marc Morje Howard, *The Politics of Citizenship in Europe* (New York: Cambridge University Press, 2009), pp. 119-134; Nergis Canefe, "Citizens v. Permanent Guests: Cultural Memory and Citizenship Laws in a Reunified Germany," *Citizenship Studies* 2(3), 1998: 519-544.

¹⁰ Sara W. Goodman, "Fortifying Citizenship: Policy Strategies for Civi Integration in Western Europe," *World Politics* 64(4), 2012: 659-98; Robert Leiken, *Europe's Angry Muslims: The Revolt of the Second Generation Reprint Edition* (Oxford: Oxford University Press, 2015).

Danish history, understand the country's political institutions, and to speak the national language at a certain level of proficiency. But in some cases, these requirements were made so demanding that it seemed their purpose was to exclude rather than include. The German state of Baden-Württemberg, for example, made acceptance of gay marriage a condition of citizenship, a curious requirement in light of its own conservative Catholic heritage.¹¹

Beyond these formal citizenship rules, there was outright discrimination and other, more subtle cultural barriers to assimilation.¹² Adjectives like German, Dutch, or Japanese have always had an ethnic connotation. Whereas an immigrant born in Guatemala or Korea can proudly assert that he or she is an American from the moment they take the naturalization oath, it is much harder for a German citizen of Turkish descent to say that they are German, even if they were born in the country and speak German as their native language. The Netherlands is famously tolerant, but it is a tolerance built around parallel communities rather than integration on an individual level. Under "pillarization" (*verzuiling*), the Protestant, Catholic, and secular communities for many years maintained their own schools, newspapers, and political parties. When Muslims started arriving in significant numbers, they were often channeled into their own pillar where they attended school only with other Muslim children. Similarly, Britain has provided public funding for Muslim schools, just as it supports Christian and Jewish schools.¹³

¹¹ "Discussion Guide For The Naturalization Authorities - Status 01.09.2005." The Country Commissioner for Data Protection Baden-Württemberg. September 1, 2005. Accessed January 05, 2018. <https://www.baden-wuerttemberg.datenschutz.de/gesprachsleitfaden-fur-die-einburgerungsbehörden-stand-01-09-2005/>.

¹² For empirical evidence of prejudice faced by French Muslims, see David Laitin, Claire Adida, and Marie-Anne Valfort, *Why Muslim Integration Fails in Christian-heritage Societies* (Cambridge, MA: Harvard University Press, 2016).

¹³ "Muslim Identities and the School System in France and Britain: The Impact of the Political and Institutional Configurations on Islam-Related Education Policies," paper presented for the ECPR General Conference, Pisa, September

A second way in which contemporary liberal democracies have impeded assimilation is the expanding number of rights that they have granted to non-citizens, which has sharply reduced the incentives for immigrants to become citizens. All democracies properly give rights to aliens residing on their territory. In the United States, this practice goes back to the founding of the Republic, when Founding Father James Madison argued in favor of giving resident aliens due process rights.¹⁴ If a non-citizen, he reasoned, obeyed American law, then that person was due the protection of the law. In the late 20th century it was largely the courts and not Congress that have been responsible for the expansion of non-citizen rights. The key turning point was the Supreme Court's 1982 *Plyler v. Doe* decision, which compelled a state to provide free public education to the children of undocumented aliens under an expansive interpretation of the 14th Amendment's due process protections.¹⁵

In Europe, the rights of non-citizens to a variety of social protections have similarly expanded. Guest workers, imported originally because they would not have to be paid health and pension benefits, slowly turned into settlers who began agitating, with the help of trade unions, for inclusion in the social safety net. In this they were supported by national courts; the German and Belgian constitutions, for example, recognize both citizens and non-citizens as rights bearers. Most European countries pay non-citizens family allowances, provide access to national health care services, and pay pension benefits, even if the individual in question returns to their country of origin. There have been moves in some European countries to grant non-citizens local voting rights.¹⁶

2007; Marie Parker-Johnson, "Equal Access to State Funding: The Case of Muslim Schools in Britain," *Race, Ethnicity and Education* 5 (2010): 273-89.

¹⁴ Casper, "Forswearing Allegiance," in Häberle, ed. (2013).

¹⁵ David Jacobson, *Rights Across Borders: Immigration and the Decline of Citizenship* (Baltimore and London: Johns Hopkins University Press, 1996), pp.

¹⁶ Jacobson (1996), pp. 38-39.

With regard to refugees, it has not been national courts so much as the European Court of Human Rights (ECHR) in Strasbourg that has expanded the obligations of member states. This comes not by virtue of membership in the European Union, but in the Council of Europe. Over the past decades the court has expanded the scope of non-refoulement obligations from the narrow set of specific abuses a returnee might endure, to general conditions of violence or economic deprivation in his or her home country. The ECHR forbids deportation of non-nationals charged with terrorism to their home countries if they face degrading treatment there. This led former Prime Minister David Cameron to remark that this leaves states "with someone who has no right to live in your country, who you are convinced... means to do your country harm. And yet... you cannot detain them and you cannot deport them." Supporters of the anti-immigrant Golden Dawn Party in Greece charge that refugees are being given social benefits that were recently taken away from Greek citizens in response to austerity measures imposed by the Troika.¹⁷ Because these rights take effect only when a migrant physically sets foot in a receiving country, the latter has a strong incentive either to build walls to keep foreigners out, or else to intercept them on the high seas before making landfall. Even in the latter case, human rights advocates has argued that a European ship constitutes European territory and therefore obliges the crew to treat refugees as full rights-bearing migrants.¹⁸

Thus in most developed democracies the distinction between a legal resident alien and a citizen has narrowed, leaving the right to vote as the only significant marker of full membership in the national community. Undocumented or illegal migrants can be deported in most cases, but even here they hold due process rights and their children have access to the full range of social protections as do citizens. The generous legal treatment of

¹⁷ Zoe Savelos, [get citation]

¹⁸ Paz, Moria, "The Law of Walls," *European Journal of Intl Law* 28: 601-624 (2017).

refugees allows a country like Germany practicing a restrictive *jus sanguinis* form of citizenship to salve its conscience, though the cases of Japan and South Korea indicate that restrictive citizenship rules and generosity to refugees do not necessarily go together.

The expansion of the rights of non-citizens in effect devalues citizenship and its symbolism regarding integration into the national community. Consequently, applications for naturalization have been falling steadily over the past three decades in both the United States and in Europe. This means that many developed democracies are hosting large communities of resident aliens who will *never* become full members of the national community. With the spread of dual citizenship, they will not have to give up their loyalties to other countries even if they do become citizens.¹⁹

The new Eastern European member states of the European Union pose an entirely different class of challenges to assimilation. These countries were even less willing to accept culturally different newcomers than the original founding countries. The Soviet occupation of the region after 1945 and its imposition of communism on them froze their social and political development. Unlike West Germany or Spain, they were not forced to wrestle with their nationalist pasts, nor did they make an effort to entrench liberal values in their citizens. They had virtually no experience with immigration, and were among the least diverse societies in the developed world. After 1989 they gladly threw off communism and rushed into the EU, but many of their citizens did not embrace the positive liberal values embodied in the new Europe. As a result, Hungary's Viktor Orban could declare that Hungarian national identity

¹⁹ The American practice of permitting dual citizenship stands in flagrant contradiction to the US oath of naturalization, in which new citizens foreswear allegiance to any other sovereign authority other than the Constitution of the United States. This is did come about as a result of a deliberate decision by Congress; rather, it was the byproduct of an administrative ruling by the US State Department. See Gerhard Casper, "Foreswearing Allegiance," in Peter Haeberle, ed., *Jahrbuch des Oeffentlichen Rechts der Gegenwart* (Tubingen: Mohr Siebeck 2013).

was based on Hungarian ethnicity, a position that forecloses any possibility of integrating a non-ethnic Hungarian into the national culture.²⁰

The final obstacle to assimilation concerns changing attitudes towards ethnic identity and multiculturalism. In the middle of the 20th century in the US, there was a widespread view that immigrants, or at least their children, should want to "Americanize," that is, to adopt the norms and cultural habits of the mainstream community, which at that point was white, male-dominated, and vestigially Anglo-Saxon Protestant. The huge cohort of immigrants that came in between the 1880s and the restrictive Johnson-Reed Act of 1924 were socialized under these conditions. The children of immigrants left their ethnic enclaves, ceased speaking the language of their ancestors, and intermarried with people from other races, religions, and ethnicities. Beginning in the 1960s, however, and coincident with the 1965 Hart-Celler Act that opened up immigration once again, the positive valence of continuing ethnic identification increased dramatically, as did that of a new kind of identity politics built around narrower groups suffering histories of marginalization. Multiculturalism became a de facto description of American society, but it was also an ideology that that deliberately attacked assimilation as a desirable goal of social policy.

The situation in Europe was somewhat different, though the degree of difference varied within the countries of the EU. Most European countries did not have a long history of immigration, and did not see assimilation as a policy goal since they assumed that guest workers would eventually return to their home countries. Interest in assimilation began to rise only as levels of foreign-born increased dramatically in the 1980s and 90s, and moved to center stage after the terrorist incidents following 9/11 that underlined the

²⁰ Viktor Orban, "Will Europe belong to Europeans?", speech given in Baile Tusnad, Romania, July 22, 2017, at <https://visegradpost.com/en/2017/07/24/full-speech-of-v-orban-will-europe-belong-to-europeans/>.

dangers posed by the unassimilated children of migrants. The European left made a transition similar to the one that took place in the US, seeing inequality and marginalization less in broad economic terms (e.g., the proletariat) than in terms of narrower identity groups like Muslim immigrants whose cultural autonomy needed to be protected.²¹

SUSTAINABILITY

[TK]

IMPLICATIONS FOR POLICY

Part of a strategy for countering populist backlash against the current immigration regime would be to address complaints that are legitimate, while preserving as much as possible of an open system of immigration and compassion for refugees. The following outlines some possible policies that flow from the analysis above.

There is no reason that a liberal democracy should not take steps to enforce its own laws regarding immigration, either normatively or as a practical political matter. The fact that large numbers of undocumented aliens can enter the US or the EU weakens respect for the rule of law, and has generated huge political backlash from ordinary voters.

However, it is very hard to see how immigration laws can be enforced retroactively against the millions of undocumented aliens already living in developed democratic countries. In the United States, this would mean deportation of 11 million individuals, the vast majority of whom have been living and working in the country productively, raising children, and obeying the law. The idea of expelling them is something worthy of Hitler's Germany or Stalin's Soviet Union. Any rule enforcement would therefore have to apply

²¹ See Bock-Côté, Mathieu, 2016. *Le multiculturalisme comme religion politique* (Paris: Les Editions du Cerf).

only prospectively to future illegal immigrants, and a way would have to be found to give the existing undocumented a path toward citizenship.

Donald Trump's border wall is not a solution to the enforcement problem, given the problem of visa overstayers noted above. A stronger enforcement regime would have to return to some form of employer sanctions, which in turn would require creation of a true national ID system, and a political strategy for overcoming the resistance of the business community to such a policy. Employer sanctions are a kinder and gentler way of enforcing the law than the current system of random deportations by ICE agents who have tremendous discretionary power in whom they detain. In addition, employer sanctions would short-circuit the current hugely backlogged system of immigration courts in processing deportation cases.

This basic deal, coupling future enforcement to the legalization of aliens already in the country, was the basis for IRCA in 1986. It remains the only possible grounds for comprehensive immigration reform today. At present, the only reform on the table is an extension of the Obama administration's Deferred Action for Childhood Arrivals (DACA), in which the children of the undocumented could receive legal status. DACA is a good start, but the program needs to be expanded to include the parents as well.²²

Blanket opposition to a path to citizenship (a.k.a. "amnesty") is not, in my view, a reasonable position for immigration critics to take given the dysfunctionality of the current situation. What is more reasonable is skepticism about promises of future enforcement, based on the experience with IRCA. While a large number of undocumented aliens were legalized under that bill, the enforcement measures fell by the wayside—and this was something that took place under a conservative Republican administration. The reasons for this were complex, stemming both from the unwillingness of US businesses

²² This was the proposed comprehensive immigration reform package suggested by the Brookings-Duke Immigration Policy Roundtable noted above.

to use employer sanctions, to court challenges on the part of immigration advocates that limited the government's ability to carry out the law. Immigration critics argue that of the two sides to the bargain—legalization and future enforcement—only the former was actually carried out. Future comprehensive immigration reform will have to commit more credibly to enforcement measures.

In Europe, the internal migration problem cannot be solved without solving the problem of external borders. This has to mean greater support for Italy and Greece in handling the problem of migrants, both through economic subsidies to help process and settle them, and through the strengthening of Frontex. Turning back boats full of desperate refugees is morally very unappealing, but the open-ended acceptance of immigrants from poor countries is politically unsustainable, and is not a solution to the developing world's problems. This is particularly true when a very large proportion of the burden falls on two of the EU's weaker member states.

Policies to facilitate the assimilation of immigrants will vary since the barriers to integration differ sharply from country to country. The first set of changes has to do with citizenship and concepts of national identity. In many developed democracies, full membership via citizenship in the national community remains ethnically based, both in terms of formal laws and in terms of the informal understandings of national identity. This needs to be changed to more inclusive definitions of identity that are compatible with the kinds of de facto multicultural societies that many developed democracies have become.

It is perfectly appropriate for countries to strengthen the requirements for citizenship, requiring knowledge of the country's history and basic laws, and of the dominant language, and acknowledgement of loyalty to the society's democratic principles—provided that these requirements do not become so stringent as to become means of excluding outsiders. Immigrants

or their children should want to become citizens of the countries in which they settle, rather than remaining perpetually in a gray zone where they are neither excluded nor fully integrated. This will require accommodation by parties on both sides of the social contract.

The expanding rights and entitlements of non-citizens has sharply reduced the incentives that immigrants and their descendants have to fully integrate. In theory countries could try to roll back these rights, and encourage immigrants to naturalize so as to secure them. How they would do so is not clear, however, since in many cases the rights expansions were done by courts (international courts in the case of Europe) rather than by legislatures. Politically, such a rollback is a non-starter. Voters in California tried to do this through Proposition 187 in 1994, a measure promoted by Republican governor Pete Wilson which sought to restrict social benefits to undocumented aliens. The initiative passed by a margin of 59% to 41%, and similar measures received voter approval in a number of other American states. But it was successfully challenged in the courts, and was said to be a key factor in the long-term demise of the Republican Party in California. There is very little precedent for rights, once granted, to be taken away in democratic societies.

Assimilation of immigrants would therefore have to be accomplished by other means. This could begin by eliminating some of the barriers to integration deliberately erected by different countries, like the Dutch system of pillarization or the British practice of state support for religious schools, and their replacement by a system of common schools. In both cases it is a stretch to think that this would be politically feasible, but it would at least help if social integration were at least seen as a goal of a public education system. The biggest adaptation would be cultural: creation of an inclusive national identity based on liberal political principles and accessible to people of different cultural backgrounds. This

was the idea embodied in Bassam Tibi's concept of *Leitkultur*, an idea periodically floated by the German Christian Democrats but strongly opposed as culturally intolerant by many on the left.

CONCLUSIONS

[TK]

APPENDIX

Table 1

Foreign born as percentage of population, selected OECD countries²³

	1960	1970	1980	1990	2000	2013	2015	2016
Australia	22.76 9	23.037	27.713
Austria	10.57	9.06	9.54	10.33	10.39 5	16.70 4	18.2	...
Belgium	10.328	15.508	16.3	...
Canada	15.23 4	17.36	19.993
Denmark	3.689	5.781	8.478
Finland	...	0.705	0.811	1.27	2.631	5.594	6	...
France	7.49	8.31	10.64	10.4	10.13	12.04
Germany	12.40 2	12.77 6	13.3	...
Greece	6.3	10.19	1.798	6.06	10.28	12.7
Hungary	...	3.89	3.45	3.35	2.885	4.525	5.1	...
Ireland	2.58	4.41	6.54	6.49	8.665	16.42	16.9	...
Italy	0.915	1.6	1.97	2.52	3.73	9.457	9.7	...
Japan	0.56	0.587	0.65	0.871	1.02	1.4
Korea	0.316	0.42	1.23	0.1	0.321	2.6
Netherlands	...	2	3.47	8.14	10.14 3	11.62 5	12.1	...
New Zealand	14.08	14.57	15.11	15.56	17.18 7	22.40 6
Norway	6.792	13.86 8	14.9	...
Poland	7.75	5.6	...	1.6	...
Spain	0.696	0.95	1.31	2.12	4.891	13.43 9	12.7	...
Sweden	...	6.55	7.52	9.22	11.31 4	15.97 3	17	...
Switzerland	...	13.41	16.87	20.73	21.864	28.303	27.9	...
United Kingdom	...	5.29	5.96	...	7.925	12.261	13.3	...
United States	7.919	11.024	13.079	13.44	...

²³ Source: OECD

