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## Why Compare Canada? – On the Benefits of a Comparative-Historical Analysis of Canadian Migration Politics

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### Résumé

*Cet article explore les avantages d'une analyse comparative historique (CHA) de la politique de migration au Canada. L'incitation à une telle analyse provient d'un débat académique de longue date qui soit présente le Canada comme un cas exceptionnel de société d'immigration paradigmatique dont l'applicabilité à d'autres contextes est limitée, soit présente le Canada comme le pays multiculturel idéal dont les autres pays devraient s'inspirer. En m'appuyant sur les premiers résultats de mon projet de doctorat, qui compare les politiques de migration au Canada, en France et en Allemagne depuis 1945, je soutiens qu'une analyse comparative qui tient compte de la dimension historique du changement peut être propice à un cadre analytique renouvelé pour les politiques comparées de migration. Pour illustrer mon propos, la dernière partie de cet article présente une analyse des développements dans chaque pays après le moment critique de 1945.*

### Abstract

*This article explores the benefits of a comparative-historical analysis (CHA) of Canadian migration politics. The incentive for such an analysis comes from a longstanding academic debate that either presents Canada as an exceptional case of a paradigmatic immigration society with limited applicability to other contexts or holds Canada up as the ideal type multicultural country that other countries should draw inspiration from. Drawing on first findings from my PhD project, which compares the migration politics in Canada, France, and Germany since 1945, I argue that a comparative analysis that takes into account the dimension of change can be conducive to a better understanding of the historical dynamics for the comparative politics of migration regimes. To illustrate my argument, the final part of this paper will present an analysis of the developments in each country case following the 'critical juncture' of 1945.*

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## Introduction: The Trouble with Exceptionalism

The main problem with exceptionalism is not the absence of exceptional cases: most surely, they exist. Rather the claim that an instance is exceptional tends to act as a barrier to other forms of analysis that could demonstrate whether, and, if so, how and why there is this exception. Ultimately, it tends to lead to the generation of a whole series of particularistic, sometimes misleading, accounts. (Ware 2011, 411)

Canada has long been hailed as the international “poster child” for its immigration and multiculturalism politics (Fleras 2015, 328; see also Kymlicka 2004). Students and researchers of the Canadian model of immigration and multiculturalism have also argued that it is exceptional, referencing Canada’s historical trajectory as a settler society, its geographic location, and recently even its electoral politics (Kymlicka 2004; Bloemraad 2012; Schultze/Gerstenkorn 2015; Triadafilopoulos/Taylor 2020) as reasons for this uniqueness. Canada’s exceptionality, these researchers often hold, impinges on the applicability of its model to other contexts. Despite these objections, many policy makers have looked to Canada for guidance on how to design their immigration and integration policies in recent years. This is particularly true for Germany, where numerous articles have been published and even conferences have been held on the possibility of applying the Canadian policy framework to the German case (Geißler 2003; Schultze 2006; Bendel/Kreienbrink 2008; Alm 2020).<sup>1</sup>

While Germany has a long history of immigration that predates the Second World War, it has taken until recently to acknowledge its status as an immigration country.<sup>2</sup> In contrast to Germany, France has long embraced its status as Europe’s oldest immigration country (Wihtol de Wenden 2011, 61), with a steady influx of immigration since the middle of the 19<sup>th</sup> century, interrupted by the Vichy years. Interestingly, the republican model of immigration and integration could be seen as

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- 1 The German Left Party *Die Linke* is the only party which has not explicitly demanded the introduction of an immigration policy similar to the Canadian Points system. Even politicians from the right-wing *Alternative für Deutschland* (AfD) have asked for “an immigration system fashioned after the Canadian example” in the party principles referenced in their programme (Ghelli 2015). In an article from 2017, party chair Alice Weidel is cited giving the following statement in the ZDF-emission “Wie geht’s Deutschland” (*How’s it going, Germany?*): “We need a reasonable immigration policy like the Canadian or Australian role models.” (Pezet 2017) In my research project, I have found that the Canadian Embassy actively promotes the Canadian model. Academically, another notable contribution to this discourse is the 2014 special issue of the journal *Comparative Migration Studies* focusing solely on the comparison between Canada and Germany (Saharso/Scholten 2014).
  - 2 There has been on-going scholarly debate (El-Mafaalani 2018, Foroutan 2019) whether and when there has been a palpable discursive shift or just some lack of clarity as to whether Germany’s self-perception has changed. One thing to note is German Interior Minister Horst Seehofer’s 2018 contention that ‘migration is the mother of all problems’, which seems to contradict the claim of a palpable shift in Germany’s self-conception.

in opposition to the Canadian approach, as the distinction between group-related needs is perceived as a violation of basic republican principles of non-differentiation (Weil 2005; Vuddamalay/Vasta 2006; Wihtol de Wenden 2011).

In considering these three cases, it emerges that they each represent distinct types of immigration societies. Their trajectories have long been classified as paradigmatic and have been contrasted in numerous works (i. a. Brubaker 1992; Joppke 1999; Triadafilopoulos 2012). These typologies have remained fairly static in the literature. While there is a rich body of literature that studies these cases in-depth, and at times two comparatively, there is to date no coherent study of these three cases with regards to their migration politics that allows for their systematic comparison in political science.

To develop such a study, a comparative-historical analysis (CHA) of these cases since 1945 appears to be one appropriate option. Rather than getting attached to the idea of Canadian exceptionality, a comparative analysis could help us understand which aspects of the Canadian migration politics trajectory contribute to this conception and also, where these three countries' trajectories are actually more alike than previously assumed. In this paper, I therefore set out to answer the following research question: What are the benefits of a comparative-historical analysis of migration politics for the Canadian, French, and German case since 1945? In short: Why should we compare Canadian migration politics?

To choose migration politics as a unit of analysis poses an initial conceptual challenge: Which areas of research (and politics) should be considered part of migration politics? I have argued elsewhere (Alm 2018) that a comprehensive analysis of migration politics should include the analysis of immigration, citizenship and integration politics as interconnected policy fields. For the purposes of this article, immigration and citizenship will be at the forefront of the analysis, since the concept of integration itself did not become part of political discourse until the 1960s and 1970s. Nevertheless, certain aspects of citizenship and immigration politics include references to social and political rights, which arguably could be considered as part of integration politics.

In this article, I argue that comparing Canada's migration politics since 1945 with France and Germany through the prism of comparative-historical analysis will allow for new insights into the differences and similarities in the trajectories and self-understanding of each of these paradigmatic country cases with regards to their migration politics. In contrast to researchers who would insist on the exceptionality of each of these cases (and therefore on the limited benefit of comparing them), I contend that this sort of systematic comparison will not only yield such aforementioned results for the concrete empirical cases at hand but contribute to a "fresh set of tools and analytic frameworks" (Fleras 2015, 33 referencing Castles 2007) that is much needed for the study of migration today. The purpose of this article is therefore to give insight to the value of comparison in social science to readers from other disciplines and allow for a brief analytic illustration of this approach.

To answer my proposed research question, this paper is divided into three sections. I will first give a brief introduction on the comparative method in political science and the approach of comparative-historical analysis. In the second section, I will introduce and substantiate the reasons for my case selection. In section three, I offer an exemplary analysis of the historical trajectory of Canadian migration politics after the critical juncture of 1945, contrasting the developments with the German and French case. This will serve to illustrate my argument.<sup>3</sup>

## 1. On the Comparative Method and Comparative-Historical Analysis

### *Why do we compare?*

In an essay on the “nature and future of comparative politics”, renowned political scientist and comparativist Philippe Schmitter points out that the “tentacles of comparison” (2009, 33) within the discipline of political science are hard to escape. Even if a researcher is preoccupied with only one case, Schmitter writes, as soon as they seek to analyse, classify, and critically evaluate, rather than merely describe their case, they are inevitably led into the realm of comparison. In social science, he holds, comparison helps us to understand, and ultimately cope with “a messy, noisy world.” (45)

In fact, the comparative method by far predates the advent of the institutionalization of political science. Researchers on this method point to Aristotle and Plato, later Montesquieu, Tocqueville, J. S. Mill, Marx and Weber as the first researchers who investigated society and politics comparatively in order to gain a deeper understanding of the structures and mechanisms at play. Many of the approaches these well-known researchers used would now be classified as comparative historical (Schmitter 2009; Lange 2013).

### *How do we compare?*

While this brief account demonstrates that early comparative research looks back at a rich and variegated history, the last century has seen an effort to institutionalize and discipline our methods of comparison in the social sciences. With the emergence of comparative political science as a distinct sub-discipline, an epistemological chasm emerged between statistical, large-n approaches, and comparativist small-n approaches (Della Porta 2008). With criticism from both camps on the validity of their respective research agendas and results, it became apparent that these two paradigmatic approaches can be considered as following different “research logics” (Della Porta 2008, 203), often personified in the research agendas of classical sociologists Emile Durkheim and Max Weber (Borchert/Lessenich 2012, 9-10).

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3 This paper builds extensively on first findings from my on-going PhD research project “The Politics of ‘Us’ and ‘Them’ – A Comparative-Historical Analysis of Immigration, Citizenship, and Integration Politics in Canada, France, and Germany” (currently in its second year). It is supervised by Prof. Dr. Jens Borchert of the Chair for Political Sociology and State Theory at the Institute of Political Science at Goethe-University, Frankfurt am Main.

As Della Porta explains, the choice of a Durkheimian and Weberian research logic fundamentally depends on the kind of knowledge the researcher seeks. Durkheim's research agenda primarily aims at "generalization" and a "search for transhistorical permanent causes." (2008, 203) To reach this goal, a large amount of cases is tested for the reoccurrence of "concomitant variations," which emerge as patterns and are analyzed thoroughly in order to explain those causal relationships. It follows that the statistical method is the preferred device for this research agenda. A Weberian approach diverges from this logic at the onset of the research agenda: Rather than aiming for the establishment of permanently valid causal relationships, here the researcher is looking for a "thick understanding" (203), a *Verstehen* of the case/s at hand. To do so, the researcher tackles the complexity of very few cases, to ultimately look for "limited generalizations about historical divergence and concrete knowledge about specific processes." (203) By contrasting Durkheim and Weber, the fundamental difference between these two research logics emerges clearly; along with the necessity for different research designs depending on one's research logic.

### *The Saliency of Time*

For the purposes of this article, a cursory glance at this debate allows for the discussion of another crucial difference between the two logics: Their treatment of time (Della Porta 2008, 217). Numerous social scientists have written extensively on the different uses of time in research (see Pearson 2004; Lange 2013). In his seminal work *Politics in Time*, Pearson expresses his dismay at the turn in social sciences to merely treat "history as a site for generating more cases." (2004, 5) He makes a passionate argument for a renewed attention to the "temporal dimensions of social processes" (10), which he considers to be pivotal for our understanding of their origins and outcomes.

As previously outlined, a Durkheimian approach generally uses time a-historically. Time is a device to accumulate more data to increase its external validity (Mahoney/Thelen 2015, 27). Broadly speaking, the historical dimension of a causal relationship is either only featured as an "illustration" (Pearson 2004), or not featured at all in its explanation (Pearson 2004; Della Porta 2008). In contrast, in the Weberian approach, time is generally perceived as a historical reality which contributes to the understanding of the case/s at hand. Rather than using time to accumulate more data, a case's or several cases' history is considered as the central object of study (and route to understanding) for researchers of this realm. Mahoney and Thelen argue that this approach, made concrete in the approach of comparative-historical analysis, offers a large degree of internal validity, which means that the two approaches can "build on each other's findings in productive ways." (2015, 27)

To operationalize the approach chosen for this analysis, I take a close look at the 'critical junctures' that do or do not unite these cases' trajectories. Critical junctures are "phases of institutional flux during which more dramatic change is possible." (Capoccia/Kelemen 2007, 341) These phases, also at times referred to as "turning

points" or "crises" (341), are important because of their contingency: a multitude of outcomes is possible. For the purposes of this article, the developments right after the critical juncture of 1945 are studied for the three proposed cases.

### *Making the Case for a Comparative-Historical Analysis*

Comparative-historical analysis is a methodological approach within the social science that follows the Weberian logic of research. Usually dealing with only a small number of cases, CHA's "appeal comes from the general usefulness of looking at historical trajectories to study social change." (Skocpol/Somers 1980, 174) In their seminal work on different approaches to comparative history, Skocpol and Somers (1980, 175) distinguish between three different types of CHA, namely the "parallel demonstration of theory," the "contrast of context," and "macro-causal analysis." Each of these types of CHA has their strengths and shortcomings. Since the research presented in this article does not set out to prove a certain theory, my approach for the CHA of Canada, France and Germany combines the 'contrast of context' with an analysis of these contexts for their macro-causal similarities and differences. By looking at the cases as a whole, contrasting them and comparing them, I seek to reach, in the words of Skocpol and Somers, "bounded generalizations." (188) While these might not be extended beyond the studied cases, their creation allows for further study in future research of this field.

As the preceding discussion demonstrates, there is a strong case to be made for contrast-focused CHA. Most salient for this article is CHA's potential to make new conceptual contributions. This means that its hypothesis-free, more inductive look at cases as a whole, rather than a focus on pre-conceived causal relationships, allows the researcher to come to new conclusions and to generate new conceptual contributions. The particular charm of CHA lies in its methodological plurality, the relative openness of its research aim, and the possibility to comprehensively understand why the studied cases historically evolved the way that they did.<sup>4</sup>

## **2. Contrasting Cases, Emerging Types**

### *On Case Selection*

As the previous section of this article outlined, CHA offers the possibility for an analysis that will contribute to our deepened understanding of immigration, citizenship, and integration politics. Small-n case studies in particular are useful for this approach, in keeping with a design that selects most similar cases in order to allow for a systematic comparison. As mentioned in the introduction to this paper,

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4 However, the first two advantages can also be potential weaknesses, as the researcher's possibilities in exploring the cases at hand are almost endless, and the multicausality they are presented with can be both enriching and hampering to the stringency of their argument. Further, CHA's ability to reach strong, mid-level conclusions on basis of the studied cases might not allow for a generalizability beyond cases that are very similar to those which were studied at the onset.

the three cases that have been chosen for this analysis, Canada, France, and Germany, can be considered most similar cases with regard to their political and economic systems, as they have been, since 1945 or shortly thereafter, high-income liberal democracies operating under a capitalist system. However, these countries' approaches to migration politics have been very different, and their paradigmatic positions are often contrasted in the political science literature: Canada is described as a multicultural immigration society, juxtaposed with France as a republican-assimilatory society, while Germany is ambivalently positioned as a de-facto multicultural society that has not quite let go of its ethnic-nationalist 'complete society' self-conception. However, these typologies remain limited in scope: related research projects often look at a more limited definition of the migration politics field or examine a different time frame than the one chosen for this project. In the following, I will present a brief overview of the three cases as a precursor for the exemplary analysis in the subsequent section of this paper.

*Canada: The Multicultural Immigration Society*

A mid 20<sup>th</sup> century shift can be observed in the Canadian self-conception: In the first half of the 20<sup>th</sup> century, the Canadian immigration system was characterized by a racialized understanding of Canada as a "white man's country." (Triadafilopoulos 2012, 18) Before the middle of the century, immigration policies explicitly distinguished between 'desired' and 'undesired' immigrants along racial lines.<sup>5</sup> After 1945, in reaction to the atrocities committed in World War II, a feeling of guilt towards Jewish refugees that were turned away by Canada, and the global wave of decolonisation, demands for a more transparent and fairer, "color blind" immigration system grew. (Fleras 2015, 91) This period can be considered as the onset for a new approach in Canadian immigration history, as it paved the way to contemporary Canadian society. It led to the introduction of a points-based system for skilled immigrants in 1967. In 1988, Canada became the first country to affirm its status as a multicultural country constitutionally. This affirmation significantly strengthened Canada's continued self-conception as a liberal-minded and welcoming immigration society. Today, Canada is considered to be the paradigmatic "immigration society" (78), with an international image of being the 'poster boy' for a successful immigration country (Kymlicka 2004). Immigration forms an integral part of "Canada building" (Fleras 2015, 78) and is understood to be one of the founding principles of Canadian national identity.

*France: The Egalitarian-Assimilatory Republic*

France is Europe's oldest immigration country (Weil 2005; Wihtol de Wenden 2011, 61). In the first half of the 20<sup>th</sup> century, immigration to France was shaped by a strong influx from its neighbouring countries (a process Weil calls "immigration du

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5 Fleras describes this system with reference to Walker (1998) as a "racial pecking order." (2015, 84)

voisinage," 2005, 14). After the experience of the Second World War, France introduced a low-threshold immigration system for workers as early as 1945. Immigrant composition changed significantly in the second half of the century, marked by a distinct impact of France's colonial history. (Bleich 2005) Today, France's largest immigrant groups come from former colonies and represent a postcolonial presence, which also explains why "attitudes towards minorities were shaped by centuries of national expansion and colonial experience." (Vuddamalay/Vasta 2006, 3) In stark contrast to Canada, academic discourse has for a long time characterized France as the "archetypical assimilatory society." (Simon/Sala Pala 2010, 92; also Brubaker 1992; Vuddamalay/Vasta 2006) In line with its republican traditions, the 'principle of non-differentiation' is central to French immigrant integration policy. To add to this, the attainment of citizenship is considered the pivotal moment of the immigrant integration process. (Simon/Sala Pala 2010, 93-94) This leads to some tensions, as this model does not allow an analysis of racialized discrimination, which exists, but effectively cannot be tackled in policy. (Simon/Sala Pala 2010)

*Germany: The de facto Multicultural, Self-Conscious Country of Immigration*

In the triad between France and Canada, Germany presents an ambiguous case. The first half of the 20<sup>th</sup> century saw the introduction of policy measures dedicated to excluding unwanted immigrants, notably Jews and Poles from Eastern Europe, as well as significant emigration. This was followed by the terror of the Nazi Regime, a brutal dictatorship which culminated in the Second World War (Triadafilopoulos 2012). Postwar, since the middle of the century, the Federal Republic<sup>6</sup> has been ambiguous and "self-conscious" (Schönwälder 2010) about its status as an immigration country. Economic clientele politics lead to the immigration of a large number of so-called 'guest workers' in the 1960s, a policy which rested on the myopic supposition that these workers would return to their home countries once they had completed their assignments. Despite a full stop to labour migration because of the oil crisis in 1974, Germany's liberal refugee policy, as well as the family reunion policy supported by the Basic Law, led to consistent immigration in the second half of the 20<sup>th</sup> century (Joppke 1999). The decade-long contention by German political elites that Germany is "not a country of immigration" (Joppke 1999; Triadafilopoulos 2012) changed somewhat in the early 2000s. Today, its status as an immigration country has been hesitantly acknowledged on a discursive level (Foroutan 2019). Nevertheless, Germany is still reluctant to recognize its "de facto multicultural" society (Triadafilopoulos 2012, 2), which has resulted in an inconsistent, patchwork style policy field, as immigrant integration policies differ significantly on the state and federal levels (Schönwälder 2010). The persistent German reckoning process with its

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6 For the purposes of this research project, my focus will lie primarily on the developments of the German Federal Republic (FRG). While the developments in the (German Democratic Republic) GDR will find attention in the PhD project, this paper focuses on West German developments.



self-perception as an immigration country (or lack thereof) is also reflected in the ongoing and so far unresolved question about what constitutes so-called German '*Leitkultur*.' (Schönwälder 2010).

### **3. 1945 as a Critical Juncture: Comparing Postwar Politics of Immigration and Citizenship in Canada, France, and Germany**

#### *1945 as a Critical Juncture*

It is clear that the end of the Second World War marked a paradigmatic change in the global world order. This is particularly true for the European countries studied for this article: After the war, Germany emerged from more than a decade of dictatorship and set out on a shaky path towards democratization, while France was grappling with cleaning up the damage done by the Vichy regime to its previous *III. République* with jump-starting into a troubled (and relatively short-lived) *IV. République* in 1946.

Some researchers have argued that 1945 also constituted a paradigm shift for Canadian migration politics. (Ambrose/Mudde 2015, 224; Winter 2015, 4) When taking a closer look at the postwar developments in Canada, there is some ambivalence surrounding this supposed turning point. As the following sections will show, the effects of the turning point were not felt as severely in postwar Canada. One fundamental difference that ought to be noted is that Canada emerged from the war with the same government that it had had for ten years prior, a government which had opposed the immigration of Jewish refugees during the Nazi regime and generally pushed an immigration agenda that was decidedly exclusionary towards non-white people and Eastern Europeans. (Triadafilopoulos 2012, 57-58) This, along with the fact that Canada was not under the same explicit scrutiny to prove its postwar democratic values, explains why the post-1945 political paradigm shift/s, which were fundamental for France and Germany, did not touch Canada in quite the same way. Nevertheless, I will argue that while immigration policy did not undergo a significant shift in the immediate post-1945 era, Canadian citizenship policy did. Also, as the following sections will show, the political discourse regarding immigration politics in Canada shows surprising similarities to the French case.

#### *Postwar Immigration and Citizenship Politics in Canada: Same, Same, Not Different?*

During the first half of the 20<sup>th</sup> century, migration politics in Canada followed a distinctly racist exclusionary politics of immigration. Canada was to be kept 'white,' and Canadian immigration politics followed this doctrine "if not always in law then in practice." (Winter 2015, 1) Policies prior to the war had been established to exclude Chinese and Indian immigrants, and during the war, German and Italian immigrants were explicitly excluded. (Fleras 2015; Triadafilopoulos 2012) There is little that indicates that this changed postwar. As Triadafilopoulos points out, the postwar politics of migration in Canada were "remarkably static." (2012, 58) I agree with this contention particularly with regards to the postwar discourse surrounding immigration. The words of Canadian Prime Minister Mackenzie King from a speech

held in 1947, in which he first affirms the continuation of immigration politics in order to support the growth of the Canadian economy, confirm this view:

There will, I am sure, be general agreement with the view that the people of Canada do not wish, as a result of mass immigration, to make a fundamental alteration in the character of our population. Large-scale immigration from the Orient would change the fundamental composition of the Canadian population. Any considerable Oriental immigration would, moreover, be certain to give rise to social and economic problems of a character that might lead to serious difficulties in the field of international relations. (cited in Triadafilopoulos 2012, 58)

As Triadafilopoulos himself writes in his interpretation of this statement, Canadian postwar immigration politics could be considered “janus-faced.” (58) The invocation of the threat posed by non-white immigration underlines that the Canadian government was nowhere close to changing its stance on maintaining a white Canada through its immigration politics.

However, while there might not have been a pronounced postwar shift in Canadian immigration policy, citizenship policy underwent a significant change right in 1947. As Elke Winter (2015, 5) explains, Canada’s participation as an ally in the war pushed it towards greater independence from the United Kingdom, and discussions on a citizenship independent from British rule ensued in 1945. The subsequent implementation of the new Citizenship Act in 1947 was the first reformation of citizenship since 1921. As Winter remarks, the new Citizenship Act followed a consensus that had grown during the war years, that all people residing in Canada which had participated in the war efforts should be recognized as Canadians. This also explains why this citizenship law eased the path towards naturalization for people who were not born in Canada. Concomitantly, candidates were now given a book on *How to become a Canadian* (Winter 2015), which could be considered as a first attempt at giving guidelines for long-term settlement in Canadian society, in this instance closely attached to the concept of citizenship, which would later be referred to as a step towards integration politics. Winter is unconvinced that the new citizenship law changed the perspective on the idea that the quintessential Canadian should be “white and British.” (6) The numbers also suggest that this citizenship act might have only had limited effects on increasing naturalizations at the time, since an uptick in naturalizations can only be observed starting in about 1954, remaining approximately at the same, very low level, from 1945 to 1952. (2) However, while immigration politics did not undergo significant change in the aftermath of the war, the idea of a more comprehensive Canadian citizenship might very well be perceived as a starting point for a paradigm shift if we take a look at citizenship developments in France and Germany at the same time.

*Postwar Citizenship and Immigration Politics in France*

Despite the very different experience of defeat and subsequent occupation in France, French immigration and citizenship politics post-1945 followed a remarkably similar path to the Canadian trajectory with a view to its citizenship politics. French citizenship had been relatively open to naturalization since the mid-19<sup>th</sup> century, taking a (for European countries rather) unusual *ius soli* approach to naturalization. (Wihtol de Wenden 2011, 77; Brubaker 1992) In the immediate aftermath of the Vichy Regime, the Justice Ministry prioritized naturalizations for members of the French Resistance to acknowledge their commitment during the war years. It seems as though these naturalizations were not given systematically and, to reference one irritated Justice ministry official, "sans vue de l'ensemble" (Weil 2002, 144; 146), which is why discussions arose immediately in 1944 on possibilities for restructuring the *Code de Nationalité* from 1927. In reaction to this, the French government instated a commission to study the needs for restructuring the French nationality law. Patrick Weil references a letter of instructions sent by Charles de Gaulle to the Justice Minister Pierre-Henri Teitgen in early 1945. Talking of the need to restructure the current system of naturalization, de Gaulle writes who he thinks should be prioritized for naturalization with regards to ethnicity, profession, demography and geography:

[...] sur le plan *éthnique* limiter l'afflux des Méditerranéens et des Orientaux qui depuis un demi-siècle ont profondément modifié la structure humaine de la France. Sans aller jusqu'à utiliser comme aux États-Unis [...] un système rigide de quotas – il est souhaitables que la priorité soit accordée aux naturalisations nordiques. (de Gaulle referenced in Weil 2002, 147, italics in the original)

With regards to profession and demography, de Gaulles asks the minister to pass on the instruction that young people who are manual labourers and agriculturalists should be prioritized, closing with the instruction that naturalizations should be kept low in the large cities of Paris, Marseilles and Lyons and augmented in the countryside. (Weil 2002, 147) A law that restructures French nationality is subsequently passed in October 1945, followed closely by a decree that affirms France's official status as an immigration country in November 1945. (Weil 2005, 15) Two things are worth highlighting here: Firstly, although de Gaulles' exchange with the Justice Ministry references naturalization strategies, the instructions he gives very much read like an immigration strategy. This can be explained by the fact that these two aspects of migration politics were strongly enmeshed in the French case: becoming a French citizen was seen as the central mechanism along the immigration trajectory. (Wihtol de Wenden 2011, 77) Secondly, it is worth highlighting the remarkable similarity of de Gaulles' request to select new French citizens on the grounds of their ethnicity to Mackenzie King's speech two years later. Nevertheless, despite his (and some justice ministry officials') wishes, the new law itself did not

distinguish on ethnic grounds and the demand for naturalizations by Northern Europeans was just not high enough to meet de Gaulles' vision. In fact, Weil explains, both demographic pressures to augment the French population as well as political resistance against a selection along ethnic lines in light of the Nazi terror rendered the selection of new French citizens along ethnic lines very much "passé de mode." (157) In 1947, the year with a record number of almost 112.000 naturalizations in France, the highest share of naturalization is Italians (50%), with Northern Europeans cumulatively only making up about 2%.

*Postwar Citizenship and Immigration Politics in Germany*

The rupture of post-1945 politics in Germany was all-encompassing as four years of political incertitude ensued. The re-establishment of a citizenship policy would have to wait until 1949, as all rules were made by the occupying powers. The citizenship policy that was then established followed a path of a decidedly ethno-culturalist understanding of German nationhood, which might be shocking in light of the horrors committed by the Nazi regime. (Brubaker 1992, 169) However, two historical developments of those four postwar years had a significant bearing on the design of citizenship policy of the newly established Federal Republic: The partition of Germany and the postwar refugee crisis. (Brubaker 1992, 169; Triadafilopoulos 2012)

The end of the war was followed by the worst refugee crisis Germany had ever encountered. No less than nine million people are estimated to have fled from the East to the Western zones, "joining millions of internally displaced Germans, civilian foreign workers, prisoners of war, and returning German servicemen." (Triadafilopoulos 2012, 70-71) This crisis was unprecedented in magnitude and it led to numerous social conflicts in the immediate after-war years (Chin/Fehrenbach 2009). Simultaneously, the territory which was to become the GDR and the FRG was divided into several occupying zones, and subsequently two separate states. Following these developments, Brubaker explains the establishment of an *ius soli*-based citizenship law in the new Federal Republic thusly:

The postwar reconstruction of citizenship [...] reflected this self-understanding as a nation without a state. The architects of the new state emphasized its provisional character and wrote into the Preamble to its Constitution a commitment to the realization of German unity [...] Article 116 of the Constitution drew the conclusions of that commitment for citizenship law: 'everyone is a German [not a West German] in the eyes of the Constitution ... who holds German [not West German] citizenship or who has been admitted to the territory of the German Reich as it existed on December 31, 1937. The provision distinguishes between two groups of 'Germans': German citizens and ethnic German refugees as expellees from Eastern Europe. 'German citizens' never meant West German citizens.

[...] This meant that the Wilhelmine citizenship law of 1913, with its system of pure *jus sanguinis*, remained in force and became the law of the Federal Republic. (Brubaker 1992, 169)

The recurrence to the 1913 law of *jus sanguinis* citizenship as the basis for the new citizenship law allowed the Federal Republic to both admit the eastern refugees as Germans into the newly established state, and to constitutionally oppose the partition of Germany into two states. (Brubaker 1992) However, in light of the horrors committed by the Nazi regime, and offset against the developments in France, this development seems, to once again borrow from Brubaker, "peculiar." (168) It is even more striking when we consider that this law remained in place for another fifty years, until a new reformed citizenship law was established in 2000. This understanding of German citizenship as highly exclusive, with an almost impossible chance of naturalization (like in France) or the option of 'becoming German' (like Canada introduced postwar), undoubtedly shaped the design of the immigration policies of the 1950s, which, successfully masked as labour market policies, rested on the idea that immigrants should not permanently settle in the country.

### **Conclusion: Placing Canada in a Comparative Context**

In this article, I set out to explore the benefits of a comparative-historical analysis of Canadian migration politics. To do this, I considered the possible insights of comparison that could be gained from analysing Canadian, French and German Migration Politics since 1945. Therefore, the argument developed in this essay was three-fold: I first explained how and why we undertake comparative analyses in social science research. I also specified the benefits of comparative-historical research, highlighting its depth and attention to detail. I then explained why the Canadian case can be better understood offset against the French and German case. Lastly, by delving in a brief illustrative contrast-oriented analysis of the developments that followed (or did not follow) 1945, I was able to show that there are first insights to be gained for understanding whether Canada's migration politics remained largely the same, while France jump-started into a new migration regime and the German territories experienced large-scale immigration by refugees.

The analysis of 1945 as a critical juncture and the starting point for my research project in the last part of this paper served as an illustration of the benefits of a comprehensive CHA. Following the 1945 global rupture, immigration politics did not change significantly in Canada, while France reinstated its immigration country status almost immediately after the end of the Vichy regime. While war-torn and defeated Germany experienced a refugee crisis of extraordinary proportions, the political implications of de-facto mass-migration movement at the policy level would only emerge after 1949, in the form of citizenship policy. In an eerie continuation of

the 1913 *Wilhelmine RuStaG*<sup>7</sup>, this policy allowed for the refugees to be conceived of as 'ethnic' Germans, their integration into the West German state therefore occurred under an *ius sanguinis* policy that granted citizenship according to descent. Managing immigration through citizenship also occurred in France, where the new policy for the naturalization of foreigners in 1946 was distinguished along requirements that read a lot like immigration policy. Changes in citizenship policy were also brought about in Canada in 1947, not only to separate Canadian citizenship from the British empire, but evidently also to acknowledge the service of Canadian residents in the war by offering them the possibility to become Canadians. This citizenship reform could be considered as a founding element of a renewed Canadian identity. I would argue that this development also challenges the view that the end of the World War did not have an immediate effect on Canadian migration politics. In the immediate aftermath of the 1945 rupture, France emerges as the country with the most pronounced changes in its migration politics.

The value of comparison in social science should not be underestimated. Comparison contributes and deepens our understanding of how and why certain outcomes came about. In short, a comparative-historical analysis of Canadian migration politics allows for fresh impulses for our understanding of contemporary migration politics, as their saliency continues to increase unceasingly. My analysis opens the floor to innovative and fresh analyses of this model in comparison with other cases, to allow for new insights. By continuing such an analysis in my on-going PhD research project, I hope to make such a contribution.

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