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PUBLIC DEBATES ON INTEGRATION AND IMMIGRATION IN SIX WEST EUROPEAN COUNTRIES

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Public debates on integration and immigration in six West European countries

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Robert Schuman Centre for Advanced Studies

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Abstract

By analyzing public debates on integration and immigration and issues this paper investigates to what extent citizenship models can be considered a broader societal phenomenon. Do these models exist beyond legal regulations? Do they shape the way political actors struggle over such issues in public or are these debates transnational in nature and much more influenced by international actors and liberal norms? To answer these questions, positions and arguments of political actors in the context of various issues related to integration and immigration are investigated. Quantitative media data for the period 1999 – 2006 are used to analyze debates in Austria, France, Germany, the Netherlands, Switzerland and the United Kingdom. Results show that citizenship models are not reflected in national debates. On the contrary, they are very similar across countries. There is no form of direct transnationalism either: Foreign and international actors play a negligible role in national debates. However, forms of indirect transnationalism can be observed: Political actors relatively often resort to moral-universalist arguments to back their positions.

Keywords

1. Citizenship models as broader societal phenomena?

Various studies have shown that there are substantial differences between countries with regard to citizenship and cultural group rights (Brubaker 1992; Castles and Miller 1993; Koopmans et al. 2005, 2010; Howard 2009). The way immigrants are naturalized and integrated follows specific patterns that are commonly circumscribed as national citizenship models. To distinguish countries most often naturalization criteria, integration requirements and cultural rights are taken into consideration. In other words, citizenship models are mostly investigated in the context of legal regulations.

In this paper a different approach is taken: I set out to investigate whether citizenship models constitute a broader societal phenomenon and can also be observed beyond formal regulations. Such an undertaking allows me to address two important arguments in the literature. On the one hand, it is commonly assumed that formal citizenship regulations reflect a broader understanding of how a nation-state is organized and cultural boundaries are drawn.

On the other hand, it is often argued that nation-states as we know them are about to disappear and that we enter a new postnational age. It is still disputed whether such developments have already shaped formal regulations (Soysal 1994; Koopmans et al. 2005; 2010). In any case, if there are any forms of transnationalism at all they might first be observed in public debates as they constitute an open space where new ideas easily enter and that are most sensitive to new developments. Thus, even if formal regulations diverge it might be that understandings of citizenship are much more similar across countries and shaped by transnational processes.

Brubaker (1992: 21), who makes a fundamental difference between the French and the German model of citizenship, argues that modern states are not only territorial organizations, but associations of citizens and that they claim to be the state for a particularly bounded citizenry whose will and interests they express. Speaking of cultural idioms Brubaker's (1992) argument implies that citizenship models constitute more than formal regulations and also reflect ways of thinking and talking about nationhood. In other words, the way cultural boundaries of a nation are drawn in national regulations reflects some deeper societal understanding of what the nation is.

Brubaker has, however, also emphasized that while the prevailing elite's national self-understandings are very different across countries, "[p]opular understandings of nationhood may be much more similar." (Brubaker 1992: 184 and 242, note 9) Similarly, Hansen and Koehler (2005: 623) argue that when the question of citizenship models is treated in the literature, it is mainly about the conceptions of nationality that are "rooted deep in *policy makers'* value systems and response mechanism […]" (my emphasis).

The extent to which popular understandings of nationhood correspond to national citizenship regimes has already been studied by a relatively large number of scholars. They were interested in individual national self-understandings and attitudes towards immigrants and started their studies from the assumption that "[citizenship] policies can be seen as signifiers of how a certain *society* has come to view people living within and outside that society." (Hjerms 1998a: 463; my emphasis) These studies, however, came to diverging conclusions. While some revealed strong relationships between citizenship models and individual attitudes (Maddens et al. 2000; Weldon 2006; Pehrson et al. 2009), others have shown that policy regimes are not reflected in the attitudes and identities of ordinary citizens (Hjerm 1998a; 1998b; Janmaat 2006; Svallfors 1996: 133-134; Jones and Smith 2001; Haller 2002: 149-152; Raijman et al. 2008; see also Fetzer 2000; Fetzer and Soper 2005)

Seeking an explanation for the absence of a relationship Hierm (1998a: 463) argues that it might be that ordinary people are simply not aware of citizenship policies. Referring to Smith (1991) and Nairn (1995), Hjerm (1998a: 462) suggests that civic nationalism has become the prevailing view at the beginning of the 21ˢᵗ century especially in the Western world (see also Janmaat 2006: 72). If this were true, individual understandings of nationhood would be much more shaped by factors from outside than from inside one's nation-state.

To test the hypothesis that citizenship models exist beyond formal regulation this paper does not analyze attitudes of ordinary citizens, but sets out to investigate *public debates* on integration and immigration issues. Studying the arguments political actors defend in public provides us with an alternative way to see whether citizenship models have a broader societal basis. Public debates constitute a link between the attitudes of ordinary citizens and formal regulations. On the one hand, political actors can be assumed to voice the concerns of the larger population. On the other hand and contrary to ordinary citizens, political actors struggling over such issues are probably much more aware of formal citizenship regulations. The question is then to what extent their positions correspond with these models.

In the following, I will first define what I understand by public debates and specify why they constitute an ideal context to study the broader implications of citizenship models. I will then briefly discuss which citizenship models are commonly ascribed to the six countries under investigation in this paper (Austria, France, Germany, the Netherlands, Switzerland and the United Kingdom) and introduce different forms of transnationalism. These concepts will then allow me to investigate to what extent public debates reflect national citizenship models or are rather transnational in nature.

2. Why public debates?

By public debates I understand communication processes among political actors in public in the course of which different positions are pitted against each other, arguments are exchanged and counterarguments challenged (see Helbling et al. 2010a). By definition it is in the course of public debates that position taking and arguments of a large variety of political actors can be observed. Therefore, public debates are an ideal object to trace the ways an issue is defined and contested by political actors as well as to study deeper social and political norms and structures (Ferree et al. 2002; Koopmans et al. 2005; Helbling et al. 2010). Public debates are major sites of political contest because all of the players in the policy process assume their pervasive influence. Ferree et al. (2002: 10) argue that what goes on in public debates is heard by everyone. Similarly, for Vliegenthart (2007: 6) to reach a broader audience or to be heard by other politicians, it is almost a necessary condition to receive audience in public debates. And Koopmans et al. (2005: 26) specify that for most political actors particularly in the migration field strategies and lobbying must be backed by public visibility, resonance and legitimacy.

In his study on the Europeanization of citizenship policies, Vink (2001: 880) assumes that parliamentary debates reflect broader societal debates "in that MPs have a clear electoral interest in voicing the concerns of their voters." If this is true, public debates must even more obviously follow such societal rules. In public debates political actors need to take care what they say and how they argue. It gets difficult not to comply with dominant social norms. According to the theory of reasoned action, the intention to act is determined on the one hand by one's attitude toward a certain behavior and on the other hand by subjective norms, which are concerned with the likelihood that important referent individuals or groups would approve or disapprove of performing the respective behavior (Ajzen and Fishbein 1980).

According to the theory of "rhetorical action", to legitimize one's position in a public debate political actors are forced to argue and to justify their positions (Schimmelfennig 2001; 2002). Positions and arguments get more legitimized the more they correspond to the institutionalized norms

and values of a society. It is irrelevant whether political actors have internalized a norm or use certain arguments to instrumentally pursue egoistic reasons. What is crucial is that both opportunistic and truthful arguments have real consequences for their proponents and the outcome of a debate: Political actors are concerned about how the public exposure of their preferences will influence their standing and reputation in a community. Therefore they try to comply with the standard of legitimacy to back their arguments.

It can thus be argued that the way political actors behave in public reflects broader societal norms. With regard to our specific research topic, the question is now whether those broader societal norms are different across countries and reflect the respective citizenship models or, on the contrary, they are similar across countries and rather reflect international norms. To find an answer to this question we need to specify categories and concepts of citizenship models and forms of transnationalism to analyze our data.

3. Citizenship models and forms of transnationalism

Citizenship models

To distinguish citizenship models, scholars mostly refer to naturalization criteria, integration requirements and cultural rights (Brubaker 1992; Castles and Miller 1993; Koopmans et al. 2005; Howard 2009). Two important projects that provide larger cross-national classification systems on the basis of quantitative indicators have been conducted by Koopmans et al. (2005; 2010) for the years 1980, 1990, 2002 and 2008 and Howard (2009) for the years 1980 and 2008.[1]

Koopmans et al. (2005; 2010) propose a two-dimensional space that permits to account for both how discriminatory the individual access to citizenship is (individual equality, IE) and to what extent cultural group rights are granted (cultural difference, CD). The resulting conceptual space allows differentiating four ideal-typical configurations of citizenship. In the assimilationist corner we find Austria, Germany and Switzerland, which privilege the attribution of citizenship by way of descent (jus sanguinis) and require cultural assimilation of immigrants and candidates for naturalization. On the other side of the spectrum - in the multicultural corner - Britain and the Netherlands pursue a much more generous citizenship politics, automatically naturalize children born on their territory (jus soli) and allow a variety of cultural group rights. In the universalist corner, France constitutes a case in-between representing a civic-territorial conception of citizenship but requiring a high degree of assimilation (see Table 1).

Howard's (2009) Citizenship Policy Indicator (CPI) is based on data from the NATAC project (The Acquisition of Nationality in EU Member States: Rules, Practices and Quantitative Developments) (see Bauböck et al. 2006a; 2006b). This indicator measures aspects very similar to Koopmans et al.'s (2005; 2010) first individual equality indicator. Howard (2009: 32-34) shows that his indicator correlates at a very high degree with Koopmans et al.'s (2005; 2010) data. Accordingly, he categorizes his countries in a similar way as Koopmans et al. do (2005; 2010).[2]

Both Koopmans et al. (2005; 2010) and Howard (2009) go beyond earlier studies that defended an overly static idea of citizenship models (Brubaker 1992; Castles and Miller 1993). They collected data for different points in time and investigated developments of citizenship models. While some countries liberalized citizenship and cultural group rights, others became more restrictive or continued to pursue

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[1] The other two quantitative indicators that exist are the Migrant Integration Policy Index (MIPEX) (MPG 2006) and the Multicultural Policy Index (MCP) (Banting and Kymlicka 2006) measuring integration regimes and multicultural policies respectively. I will include these indicators in the additional correlation tests in the appendix (see Table A1).

[2] As Howard (2009) analyzes the member states of the Europen Union, Switzerland is not included in his analyses.

the same policies. Contrary to Howard (2009), who analyzed why certain countries liberalized and others not, Koopmans et al. (2010) also investigated processes of convergence as well as path dependency effects. They found no evidence that countries' policies converged. More importantly, they revealed that policies in 2008 could best be explained by the 1980 scores on the respective dimensions. As they did not find any effects that could be related to the strength of the judiciary, left and right-wing parties or EU membership, they concluded that their path dependency hypothesis was confirmed.

We can deduce from these findings that although regimes change over time, they remain relatively similar over the span of 28 years. The categorization of countries into different groups of integration regimes thus remains relatively stable over time. For my analyses I will therefore consider Austria, Germany and Switzerland as examples of an assimilationist citizenship model, the Netherlands and the United Kingdom as examples of a multicultural model and France as belonging to the universalist corner.[3]

The question is now, if these formal citizenship models constitute broader societal phenomena, how would public debates look like? In this paper I will analyze media content data to look at *positions* that are taken in public debates and *arguments* that are employed to justify positions (see Table 1). Both positions and arguments help me measure the dominant norms that prevail in public debates. Citizenship models reflect both attitudes towards new arrivals and perceptions of one's nation-state. Attitudes can be more or less in favor of immigrants and their rights and perceptions of one's nation-state can most basically correspond to an ethnic or multicultural model.

If citizenship models play an important role, I expect public debates to be much more hostile and nationalistic when integration matters are debated in Austria, Germany and Switzerland. On the other hand, generous positions and multicultural arguments should prevail in the Netherlands and the United Kingdom. France constitutes a more complicated case as it is known for a generous citizenship policy but high integration requirements. We thus expect there a rather strong nationalistic discourse, but ambivalent positions

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[3]   As it might still be disputed why a certain country is put in one group and not in another, in the appendix I will provide some additional analyses that correlate my data with the exact indicators by Howard (2009), Koopmans et al. (2005; 2010), Banting and Kymlicka (2006) and the Migration Policy Group (MIPEX, MPG (2006)). These additional analyses do, however, not lead to different results.

Table 1: Expectations concerning citizenship models in public debates

Conceptions of citizenship	Countries	Positions	Arguments	Salience of migrants and migrant organizations
assimilationism	Austria, Germany, Switzerland	restrictive	nationalistic	low
multiculturalism	Netherlands, United Kingdom	generous	multicultural	high
universalism	France	mixed	nationalistic	intermediate

As formal citizenship models mainly concern citizenship and integration requirements we mainly have to look at public debates on these issues. Unfortunately, in my data there are not enough observations to treat citizenship issues in the narrow sense (naturalization issues) as a separate category. These issues are therefore subsumed under the category integration that includes questions of what happens with those immigrants who are given access to a country (cultural and economic integration, naturalization, dual citizenship etc.). The few analyses I was, however, able to run for citizenship issues separately did not reveal results that contradict the findings of this paper.

To get a broader picture I will also look at sub-debates on neighboring issues, i.e. immigration and anti-xenophobia (see Givens and Luedtke 2005: 3-4; Koopmans et al. 2005: 81; Helbling 2010). Immigration debates basically turn around the question of who and on the ground of which conditions is given access to one's country (labor immigration, asylum- and refugee-politics, EU-migration, illegal migration etc.). Anti-xenophobia issues consist of struggles about how citizens of a country do and should behave towards new arrivals (discrimination, measures against xenophobic and racist acts etc.).

Another way to get a closer insight into national debates is to differentiate between different groups of actors. It might be that the positions and arguments of political actors that are part of the state apparatus and involved in the execution of national regulations are more shaped by national models than those of other political actors. I therefore test my arguments separately for domestic state actors that mainly include the executive body and the administration. I will contrast their positions and arguments with those of all political actors that take part in national debates and additionally include political parties, public interest groups, unions, business associations etc.

Finally, it might also be that citizenship models influence the salience of specific groups of actors. According to Koopmans et al. (2005), citizenship models constitute opportunity structures for migrants and their organizations whose resources depend strongly on how the immigration field is structured. Migrant organizations are more present in countries with a multicultural citizenship model that provides more legitimacy for those actors to appear in public (see Table 1). On the other hand, the salience of actors that defend more general interests is not expected to be influenced by such specific opportunity structures.

4. Forms of transnationalism

As there are reasons to believe that immigration debates are much more similar across countries than research on citizenship models suggests, we need analytical instruments to test how transnational developments might be reflected in national public debates. Partly inspired by the literature on Europeanization I distinguish four different forms of transnationalism along the two following axes (Knill and Lehmkuhl 1999; Vink 2001; Koopmans and Pfetsch 2003; Koopmans 2007; see also Messina 2007: 98-106): I differentiate on the one hand between direct and indirect and on the other hand between vertical and horizontal forms of transnationalism (see Table 2).

When the Europeanization of national laws and regulations is analyzed the term "positive integration" is often employed to describe how supranational directives and regulations prescribe new institutional models (Knill and Lehmkuhl 1999). This is certainly the most direct form of interference from outside a nation-state that exists. However, as there are hardly any (formal) regulations in the integration or immigration field at the supra- or international level (Lavenex 2001a) and as I am not interested in decision-making processes and formal regulations, such impositions of laws will not be part of the data employed in this paper. Nonetheless, it might be that political actors from outside the nation-state directly interfere in national political debates and try to influence them. These interferences can come from the supra- and international level (*vertical* direct transnationalism) or from other nation-states (*horizontal* direct transnationalism).

We speak of *vertical direct transnationalism* when international organizations or supranational institutions (e.g. European Union, International Organization for Migration (IOM)) participate in national debates. It might, however, also be that neighboring or sending countries take part in national debates (*horizontal direct transnationalism*). It has been shown that even within the European Union cooperation in migration policies among member countries is rather inter- than supra-governmental in nature (Guiraudon 2001: 102-104; Lavenex 2001b; Messina 2007: ch.5).

Table 2: Forms of transnationalism

	direct	*indirect*
Vertical	Interference of supra- and international actors	Reference to supra- and international actors and norms
horizontal	Interference of foreign state actors	Reference to foreign states' actors

Neighboring countries might be affected in different ways by the immigration and citizenship policies of a country or seek to consolidate resources when it comes to deal with immigration problems. Sending countries might also become relevant in national debates as they might be affected by a country's immigration policy or have an interest in influencing it. (Potential) sending countries might negotiate with the new host countries of their citizens the conditions of migration as well as residence duration and rights. Moreover, sending countries might influence or might be affected by naturalization procedures as this might also affect the rights migrants have in the countries where they migrated from. Cases in point are agreements on guest worker programs between South and North European countries (Mahnig and Piguet 2003) or debates about dual citizenship in Austria and Germany concerning the question of whether or not Turkish migrants ought to renounce their former nationality when they acquire the Austrian or German citizenship (Cinar and Waldrauch 2006: 40; Hailbronner 2006: 232-234). Another example is the Turkish Prime Minister Tayyip Erdogan who addressed the issue of integration of Turkish migrants during a visit in Germany (Süddeutsche Zeitung, 12.02.2008).

Besides direct interventions from above or from the side, there are also more subtle and weaker forms of transnationalism. We speak of indirect forms when national political actors take into consideration or address actors and norms outside their nation-state.[4] *Horizontal indirect transnationalism* signifies that the way new regulations might affect other countries are accounted for in national debates. It might for example be discussed whether the tightening of asylum laws and stricter controls at the national borders might increase the number of asylum seekers in neighboring countries. It might also be discussed whether or not naturalization regulations especially with regard to dual citizenship are compatible with the regulations in the sending countries or affect the rights of freshly naturalized citizens in their former home countries.

Finally, it might also happen that inter- or supra-national liberal norms and actors are accounted for in national debates (*vertical indirect transnationalism*). Jacobson (1996: 11) argues that "the basis of state legitimacy is in the process of shifting from an entity that embodies the people's will (national self-determination) to an entity that advances transnational human rights." Similarly, Soysal (1994: 1) observes the emergence of a new and more universal concept of citizenship, "one whose organizing and legitimating principles are based on universal personhood rather than national belonging."

While Soysal (1994) and Jacobson (1996) are rather concerned with how universal liberal norms are incorporated in national legislation and practices, I want to know to what extent such norms are referred to in public debates. Hansen and Koehler (2005: 625) argue that, when integration and immigration issues are debated, terms have sharply narrowed since World War II. Referring to Glazer (1997) they claim that we are all multiculturalists now and that appeals to ethnic bases of identity, national hierarchies and racial homogeneity have become politically unacceptable. They observe that even populist and radical right parties attempt to couch their racism in general terms (Hansen and Koehler 2005: 626).

Such liberal norms are not imposed by any inter- or supranational body—otherwise we would rather speak of vertical direct transnationalism. They are most often self-imposed as political actors decide themselves to follow these norms (Meyer 1997; Joppke 1998). Such an adoption of international norms is "inherent in the liberalness of liberal states" (Joppke 1998: 292). In other words, it is the basic principles of liberal democracy that are assumed to play a major role in national policies or debates.

5. Data and data collection

In order to get a comprehensive picture of public debates I conducted a comparative media content analysis in six Western European countries: Austria, France, Germany, the Netherlands, Switzerland and the United Kingdom. Since my data originate from a larger research project[5] the countries were selected for purposes different from the ones I pursue here. Nonetheless, the six countries under investigation demonstrate significant variety, especially with regard to the citizenship models that are often ascribed to these countries.

For my analyses, I rely on statements of political actors as they are reported in quality newspapers. The newspapers chosen are Le Monde (F), The Times (UK), the Süddeutsche Zeitung (D), the NRC Handelsblad (NL), Die Presse (A), and the Neue Zürcher Zeitung (CH). From these newspapers, we

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[4] Note that I make a difference between references to foreign/international actors and foreign/international norms. I have, however, no data to test whether foreign norms are addressed in public debates. Thus, I will only test to what extent foreign and international actors as well as international norms are addressed.

[5] The data was collected in the project "Political change in a globalizing world: a comparative study of national and transnational campaigns". This project was co-financed by the German Research Foundation (SFB 536, project C5) and the Swiss National Science Foundation (project 100012-111756), and directed by Edgar Grande (Munich) and Hanspeter Kriesi (Zurich).

collected data for the years 1999 - 2001 and 2004 - 2006. I use a media dataset because it allows me to investigate a large variety of both issue positions and arguments. Critics are quick to mention the selection bias of the press. As will become clear below, our approach takes news as a source of reported positions and arguments by political actors. We thereby filtered out journalists' own arguments. In the social movement literature, where content analysis of the press has a long tradition, various studies concluded that press reports are generally accurate (Earl et al. 2004; Rucht and Neidhardt 1998). Our own validation tests have shown that media-data measure very similar dimensions as manifesto- and expert-data regarding what political actors say, but salience constructs that are different from other data (Helbling and Tresch 2010). In other words, there is a bias with regard to the *selection of topics*, but not regarding the *accuracy of content* that is reported.

We have decided to rely on quality newspapers, since they are most likely to mirror the political debates in a detailed manner. Their general importance lies rather in their ability to influence editorial decisions of other news organizations than their print run (Bennett et al. 2004: 445). The reliability to infer from the gathered data to the overall debate in a country should be given. Koopmans and Statham (1999: 207) have shown for their Political Claims Analysis approach—a method comparable to ours in terms of basic coding instructions—that there are no significant differences in the positioning of political actors between quality newspapers and tabloids. Finally, feasibility considerations forced the original project to include only one quality newspaper per country.

We applied a two-step procedure to obtain a representative sample of relevant articles. The first step was the identification of relevant events in each country that are related to integration and immigration issues. The events were identified by a systematic retrieval using various yearbooks such as Keesing's World Record of Events and Facts on Files (World News Digest Yearbook). This list of events constitutes the basis for the development of an extensive keyword list for each country, which helped us to find potentially relevant articles.[6] Relying on such event lists has the advantage that we knew about the relevant discussions in each country before we deployed a keyword search. Thus, we could reduce the risk of missing important aspects of the debate in our selection procedure. In the second step, we chronologically selected a sample of 1,200 articles per country. Such a chronological sampling strategy follows the actual occurrence distribution of relevant articles and, therefore, the peaks and slacks of the debate.

Out of the 1,200 articles we selected all articles in which an integration or immigration issue appeared in the title, lead or first paragraph. The selected articles were coded using the method of 'core sentences', an approach already extensively applied for the analysis of party systems (Kriesi et al. 2006; Kleinnijenhuis et al. 1997). It is an inductive approach to capture the full complexity of the political debate. More specifically, we coded every statement, i.e. the relationship between a political actor and a political issue that appears in a newspaper article. Each of these statements of a political actor is reduced to the same basic structure (the so-called 'core sentence'), indicating only its subject (political actor), object (issue), and the direction (evaluation) of the relationship between the two. This direction is quantified using a five-point scale ranging from -1.0 to +1.0.[7] A 'core sentence' is always embedded in a grammatical sentence. As we see in Table 3, which gives examples of core sentences, a grammatical sentence might, however, consist of several core sentences when more than one position is taken.

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[6] All the newspapers in our sample are accessible electronically via the databases Factiva or LexisNexis.

[7] -1.0 and +1.0 mean clear opposition and support, respectively. A direction of -0.5 and 0.5 signifies an understated opposition and support, e.g. when a politician „considers to think about" supporting or opposing a policy. 0 finally means that an actor is ambivalent regarding an issue.

Table 3: Examples of the coding of 'core sentences'

'Party X is in favor of immigration because its country needs cheap labor forces and because it considers it discriminatory to exclude migrants from the national economy; it is, however, against the construction of mosques as it fears an Islamization of its country.'

core sentence	actor	direction (evaluation)	issue	1st frame (category)	2nd frame (category)
No. 1	Party X	+1	immigration	cheap labor force (economic prosperity)	discrimination (moral-universalist)
No. 2	Party X	-1	construction of mosques	Islamization (nationalistic)	-

In addition to other studies that applied the 'core sentence' approach we also coded up to five frames for each statement (see Table 3). While the term *frame* denotes "schemata of interpretation" (Goffman 1974: 21)—systems that guide our perception of reality—*framing* commonly refers to the more or less consciously managed process by which these schemata are manufactured, selected, distributed and adopted in successive steps (see Matthes 2007: ch.2). We were not interested in the entire framing process but only in one particular aspect, namely which arguments are chosen by political actors to justify their positions. By framing we thus understand how political actors define a particular problem and which justifications are related to which positions. By doing so the analysis of the framing is restricted to a single, yet central aspect, namely the problem definition aspect in Entman's definition of framing: "To frame is to *select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation*" (1993: 52, italics in original).

In the original project we coded cultural, economic and other utilitarian frames (e.g. ecological and security issues). In this paper I am only interested in cultural justifications that consist of nationalistic, multicultural and moral-universalist frames. *Nationalistic frames* are most often mobilized for the preservation of national boundaries and a culturally homogenous society in order to uphold an exclusive national identity. Important examples are statements that express fears of mass immigration and xenophobic attitudes or deplore the loss of unique national traditions and values or are afraid of "Islamization". Another important subgroup within this category of nationalistic frames comprises statements that argue that a certain policy threatens to undermine national independence or particular national institutions (e.g. direct democracy, federalism, neutrality). While national independence might also be a goal pursued out of utilitarian considerations (e.g. acting capacity of a state), the crucial point here is that national independence becomes an end in itself, which needs to be defended for the mere sake of it—the *symbolic* political value of national sovereignty is at stake. A second, contrasting category consists of *multicultural frames*. These frames favor cultural openness, exchange and the peaceful coexistence of various cultural and religious groups within a society or within Europe.

Finally, *moral-universalist frames* refer to general moral principles and universal rights that are claimable and acceptable by everyone, regardless of particular interests or cultural identities. Examples of these frames include basic civil rights (e.g. non-discrimination, humanitarian rights, rule of law) as well as political rights (democracy, participation) and international solidarity. Other typical examples include claims by which the opening of national boundaries contributes to a better understanding between peoples.

6. Results

The aim of this paper is to investigate to what extent debates on integration and immigration issues are shaped by national models, and whether we can observe any forms of transnationalism. For that purpose I first look at which actors participate in national debates, second, what the overall positions are and, third, which actors and arguments are referred to in the actors' statements. If citizenship models are relevant we should observe first of all that national actors play an important role and that the share of migrants and their interest groups varies across countries. Moreover, I expect more restrictive positions and a relatively frequent use of nationalistic frames in the three countries with an ethnic citizenship model and on average more generous positions accompanied with multicultural arguments in the Netherlands and the United Kingdom. In France, I expect a strong nationalistic discourse but ambivalent positions. Debates are qualified as transnational when international or foreign state actors play an important role, positions and arguments are similar across countries, and/or foreign and international actors and norms are relatively often referred to in national debates.

The different type of actors participating in national debates will tell us whether there is any form of direct transnationalism. In Tables 4 and 5 I differentiate between international, foreign state and national actors and show how important they are in the six countries under investigation and in the three sub-debates mentioned. In addition, I also show the salience of migrants and migrant organizations that are subsumed under the category of national actors. While there are some country differences we immediately see that international and foreign state actors play a negligible role in national debates. It gets evident that there is no form of direct transnationalism, neither vertical nor horizontal. On the contrary and in line with what Koopmans et al. (2005: ch.2) have already found, integration and immigration issues are predominantly discussed among political actors that belong to the respective nation-states. When we look at the distribution of actors in different sub-debates we get the same picture (see Table 5). Indeed, international and foreign state actors are more salient when the access to one's nation-state is debated—an issue that is potentially most prone to concern international and foreign state actors as they might be affected by other states' access politics. But even in this sub-debate national actors make up around 90 per cent of the debates' participants.

Table 4: Actors' salience per country

	all	*A*	*D*	*CH*	*F*	*UK*	*NL*
international actors	3.6	5.6	2.0	4.8	4.1	0.8	4.2
foreign state actors	4.4	5.2	0.9	7.7	7.9	0.9	3.5
national actors	92.0	89.2	97.1	87.5	88.0	98.3	92.3
total percentage	100	100	100	100	100	100	100
migrants	*6.9*	*4.6*	*4.6*	*1.4*	*7.4*	*15.4*	*7.8*
N	8,130	1,583	1,099	1,808	1,385	1,018	1,237

Notes: country weights applied.

Table 5: Actors' salience per issue

	all	*integration*	*immigration*	*anti-xenophobia*
international actors	3.6	2.3	5.1	2.6
foreign state actors	4.4	2.3	6.9	2.7
national actors	92.0	95.4	88.0	94.7
total percentage	100	100	100	100
migrants	*9.4*	*13.5*	*4.3*	*13.4*
N	8,130	3,365	3,743	1,022

Notes: country weights applied.

With regard to the salience of migrants and migrant organizations we observe a similar pattern as Koopmans et al. (2005: 79) (see Table 4): the more open an citizenship model is, the more migrants and migrant organizations get the opportunity to appear in public debates. While they hardly participate in debates in Switzerland, their participation/visibility in public debates is more than three times higher in the United Kingdom than in Austria and Germany. France and the Netherlands can be considered intermediary cases. Similarly to Koopmans et al. (2005: 78-80), we observe that the Netherlands constitutes a deviant case as migrants and migrant organizations appear less than expected.

The fact that national actors play a predominant role in integration and immigration debates, that citizenship models provide opportunity structures for migrants and migrant organizations and that direct influences from outside nation-states can hardly be detected does, however, not necessarily imply that national citizenship models direct the way such issues are debated. To test this argument we need to take a closer look at positions that are taken and arguments that are brought forward by national actors to justify their positions. Figure 1 displays the positions of all national actors for the overall debate and for each sub-debate. I have calculated the overall positions by averaging the directions of all core sentences by country and sub-issue ranging between -1 (restrictive attitudes against immigrants and cultural heterogeneity) and +1 (generous positions in favor of immigrants and cultural heterogeneity).

Figure 1: National actors' positions by country (means)
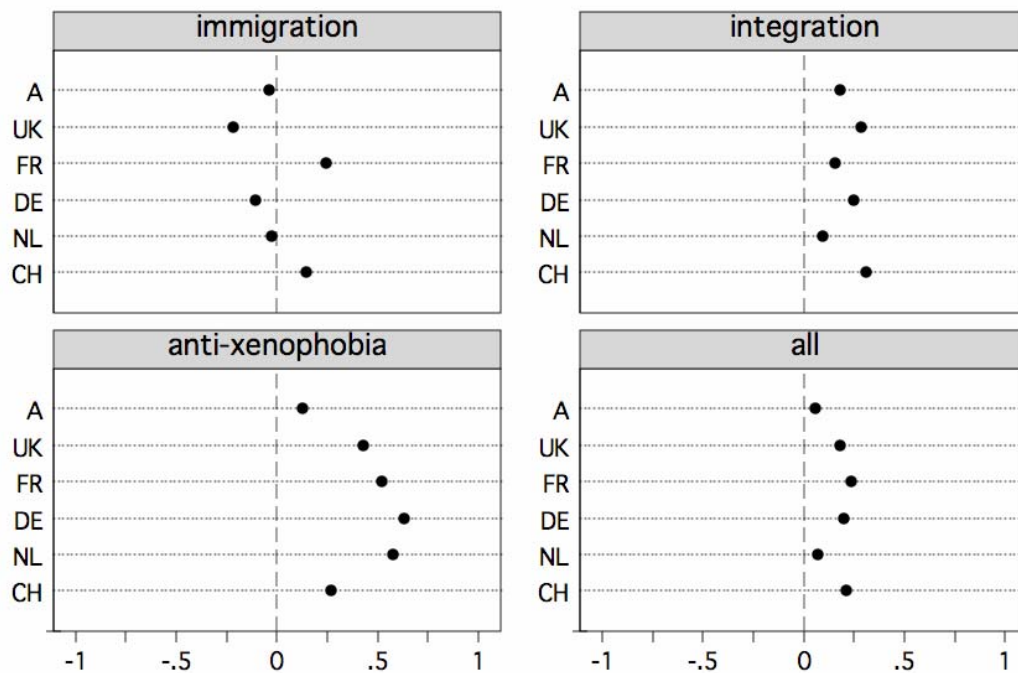
If we look at the overall results in Figure 1 we notice that there are hardly any differences across countries—all countries are (slightly) on the supporting side and therefore rather take positions in favor of immigrants. When integration questions are at stake we again observe almost the same positions in all six countries. We get a slightly different picture when we look at immigration issues: Attitudes are more critical—especially in the United Kingdom. There is, however, no recognizable pattern; and especially no pattern that could be explained with national citizenship models. The average positions are most restrictive in the United Kingdom with a civic-multicultural citizenship model and most generous in France and Switzerland that traditionally represent two different integration regimes.

Anti-xenophobia issues, finally, are the least controversial—positions are very much in favor of measurements against xenophobia in all six countries. This can be explained by the fact that besides right-wing populists hardly any political actors defend xenophobic arguments (Helbling 2010). We observe, however, some important differences between the six cases: The less-generous positions in Austria and Switzerland could be explained by their ethnic citizenship model. In Germany, however, the third case in this group, positions are most in favor of measures against xenophobia of all six cases under investigation.

While positions are very similar across countries when we include all national actors in the analysis, it might be that we recognize patterns that reflect citizenship models when we account only for the statements of domestic state actors. As it turns out in Figure 2, this is not the case. While there is slightly more variance especially in the sub-debates, the various patterns cannot be explained by citizenship models. A look at the overall means shows that positions are virtually the same in all countries—only the domestic state actors in Switzerland are more in favor of immigrants. When immigration questions are at stake, we observe the most favorable positions in Austria and Switzerland, two countries with a traditionally restrictive citizenship model.

Figure 2: Positions of domestic state actors by country (means)
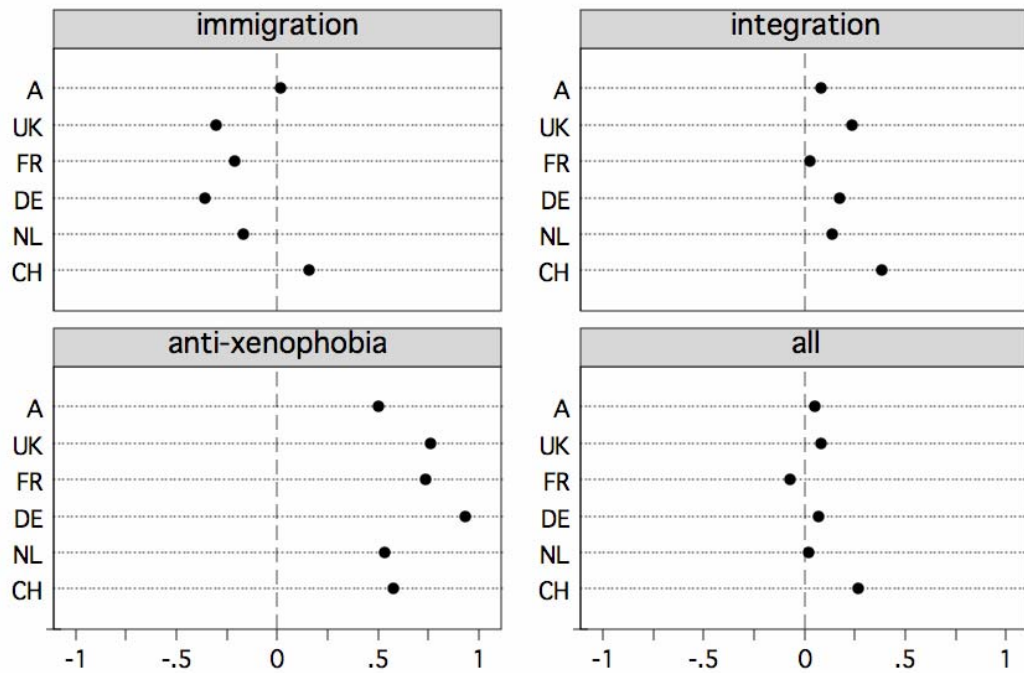
In the appendix some additional analyses are provided that correlate the positions in public debates with the detailed indicators that have been constructed by Howard (2009), Koopmans et al. (2005; 2010) and others. These analyses did, however, not reveal different findings (see Table A1). All this leaves us with some kind of a paradox: Although there are no direct influences from outside the six countries, national actors position themselves in a similar way in all six countries or at least not along the lines we would expect if citizenship models were reflected in public debates. It might therefore be that influences from outside nation-states are rather indirect. To test this argument let us look at Tables 6 to 8. Tables 6 and 7 show to what extent national political actors address international and foreign state actors in their statements. We get a similar picture as in Tables 4 and 5: Political actors outside the nation-state play a negligible role in public debates. Their positions, needs and arguments are hardly accounted for by national actors.

Table 6: Salience of addressed actors per country

	all	A	D	CH	F	UK	NL
international actors	2.1	5.6	1.0	1.9	0.5	0.0	2.6
foreign state actors	3.2	3.3	3.4	5.2	9.5	0.4	2.1
national actors	94.7	91.1	95.6	93.0	90.0	99.6	95.3
total percentage	100	100	100	100	100	100	100
N	2,600	572	597	270	200	534	427

Notes: country weights applied.

Table 7: Salience of addressed actors per issue

	all	*integration*	*immigration*	*anti-xenophobia*
international actors	2.1	1.8	2.5	2.2
foreign state actors	3.3	4.0	4.8	0.5
national actors	94.5	94.2	92.7	97.4
total percentage	100	100	100	100
N	8,130	3,365	3,743	1,022

Notes: country weights applied.

What about international liberal norms? Table 8 displays which arguments are employed by national political actors to justify their positions. In order not to lose the overall view we first need to define what integration and immigration debates are about. There are aspects others than cultural ones that can directly be related to citizenship models and are mobilized to back generous or restrictive positions: economic, social, security and political issues might also play a role in these debates. More detailed analyses have, however, shown that cultural arguments are by far most often employed. While they make up between 40 and 45 per cent in Austria and the United Kingdom, in the other four countries of my study more than 60 per cent of all frames are cultural in nature.

The question is now whether actors rather defend nationalistic arguments in Austria, Germany, France and Switzerland and multicultural ones in the Netherlands and the United Kingdom, which would be a sign that national citizenship models play a role in public debates. Or might it be that moral-universalist arguments are dominant in all countries? This would show us how important indirect forms of transnationalism are. We see in the first part of Table 8 that, overall, nationalistic and multicultural arguments are employed in about 37 percent and moral-universalist frames in over 60 percent of all cultural statements. This shows us that liberal norms from outside particular nation-states are more important than country-specific arguments. While moral-universalist frames make up slightly more than 50 percent in France and the Netherlands, they reach a share of almost 60 percent in Switzerland and more than 70 percent in Austria, Germany and the United Kingdom.

If we look at the nationalistic and multicultural frames we observe some variance across countries, but that only partly reflects citizenship models. The salience of nationalistic frames is relatively high in the Netherlands, Switzerland and especially in France - three cases that represent three different models of integration. On the other hand, the use of multicultural arguments does hardly vary across our six cases. In all countries such frames are employed in roughly 20 percent of all statements. Additional correlation tests have, however, revealed that there is an interrelationship between formal indicators and the use of multicultural frames (see Appendix, Table A1).

Table 8: Cultural frames per country

	all	A	D	CH	F	UK	NL
all national actors							
nationalistic	17.8	13.0	8.3	22.2	29.8	7.6	21.7
multicultural	19.6	16.4	18.6	18.7	17.9	19.9	25.2
moral-universalist	62.6	70.6	73.0	59.1	52.4	72.5	53.2
total percentages	100	100	100	100	100	100	100
N	2,753	180	207	985	689	175	517
domestic state actors							
nationalistic	23.6	15.4	22.4	19.2	43.5	18.9	19.9
multicultural	16.5	30.8	17.1	16.9	12.3	5.4	21.0
moral-universalist	59.8	53.9	60.5	63.9	44.2	75.7	59.1
total percentages	100	100	100	100	100	100	100
N	696	14	76	234	138	37	176

Notes: country weights applied.

When we look at domestic state actors separately in the lower part of Table 7 we see that nationalistic arguments get more important. The French case stands out again: almost half of all frames of state actors are nationalistic in nature. The main result, however, is again that besides France around 60 per cent of all justifications of domestic state actors are moral-universalist in nature.

7. Conclusion

We observed no pattern across countries in terms of positions and frames that could be explained by citizenship models. On the contrary, there is a great deal of similarity across the six cases presented in this paper. Citizenship models, which seem to be quite consistent over time and not to converge as Koopmans et al. (2010) have shown, cannot be observed beyond legal regulations and thus do not constitute broader social phenomena.

There is not much direct transnationalism either. International and foreign political actors play a negligible role in national debates. Nor is there a lot of indirect transnationalism regarding foreign and international state actors that are addressed in national debates. It turned out, however, that moral-universalist norms play a very important role in every country irrespective of the ascribed citizenship models. We thus observe weak indirect forms of transnationalism when we account for the arguments that are employed in national debates.

In line with previous studies on national identities of ordinary citizens (Hjerm 1998a; 1998b; Janmaat 2006; Svallfors 1996: 133-134; Jones and Smith 2001) citizenship models do not constitute a broader societal phenomenon. The question is now why there is such a gap between integration and citizenship laws, on the one hand, and public debates, on the other hand. Might it be that public debates have reflected citizenship models in the past, but have in the meantime evolved in another direction?

If this is true, why are these new public considerations not taken into account when laws are formulated? It might be argued that it takes some time for new ideas that become dominant in public debates to have an influence on legislation. Public debates constitute an open space where new ideas easily enter and that are most sensitive to new developments. The bureaucratic structures, on the other hand, are inert and legally regulated, changes in society are not immediately reflected in public policy. Analyses across time would allow us to show not only to what extent formal regulations change—as Howard (2009) and Koopmans et al. (2005; 2010) have shown—but also how public debates evolve and to what extent both developments influence each other.

Appendix

Here I present some additional quantitative analyses to test my hypotheses. Given the low number of cases (six countries) the possibilities of quantitative analyses are very limited. In Table A1 I present correlations between, on the one hand, positions and the use of frames in public debates and, on the other hand, various citizenship and integration indicators provided by Howard (2009), Koopmans et al. (2010), Banting and Kymlicka (2006) and the Migration Policy Group (MIPEX, MPG (2006)). Since I use data on public debates for the period 1999 – 2006 I included the Koopmans et al. indicators for the years 2002 and 2008.

Table A1 displays correlation coefficients as well as the corresponding p-values. Small-N correlation analyses lead to big standard errors. Since the interdependence of variables is highly uncertain when we have only a limited number of cases, a large standard error ensures that we do not jump to conclusions, since we need much more data to reap significant results (Goldberger 1991: 248-250). Thus, if the p-values are high, we might too quickly accept the null hypothesis. Conversely, if the number of observations is small and we still obtain statistically significant results, we can be sure that we have confirmed our hypotheses.

In other words, if we find significant correlations we can be sure that two variables are strongly related to each other. On the other hand, we should not too quickly dismiss a hypothesis if the coefficients are not significant, especially if they are relatively strong and display consistent patterns. For example, if a specific public debate indicator correlates highly not only with one but with all of the formal indicators provided by other scholars we can consider this as a sign of a strong interrelationship.

If formal citizenship models can be found in public debates I expect strong positive correlations between all citizenship indicators and positions. In other words, we should see that liberal citizenship rights and conceptions of cultural pluralism should lead to tolerant and generous positions. As of the use of frames, I would mainly expect that the Koopmans et al. indicators on cultural diversity correlated positively with the use of multicultural frames and negatively with the employment of nationalistic frames.

Looking at Table A1, overall, we see only a few strong and almost no significant correlations. In bold I indicated the correlations that are relatively strong (>0.50). Looking at this group of correlations we first see that multicultural politics (CD-indicators) leads to negative positions in public debates when immigration issues in the narrow sense are debated or when all issues are taken together. All other indicators do however not correlate (neither positively nor negatively) with these two indicators. We also see that Howard's CPI, Koopmans et al's IE and the MIPEX indicators are relatively highly correlated with positions on anti-xenophobia issues. The indicators measuring multicultural politics do, however, display very low coefficients.

Table A1: Correlations between model-indicators and positions and frames, correlation coefficients and p-values.

	positions			frames		
	all issues	integration	immi-gration	xenophobia	nationa-listic	multicultural
CPI_08	0.44	-0.11	0.46	**0.60**	0.35	**0.51**
	p=0.38	p=0.84	p=0.36	**p=0.21**	p=0.49	**p=0.30**
IE_02	0.02	-0.22	0.05	**0.58**	-0.00	**0.74**
	p=0.96	p=0.67	p=0.92	**p=0.22**	p=0.99	**p=0.09**
IE_08	0.20	-0.07	0.09	**0.56**	0.09	**0.70**
	p=0.70	p=0.90	p=0.86	**p=0.24**	p=0.86	**p=0.12**
CD_02	**-0.75**	-0.38	**-0.55**	0.10	-0.49	**0.61**
	p=0.09	p=0.46	**p=0.26**	p=0.86	p=0.32	**p=0.20**
CD_08	**-0.65**	-0.40	-0.44	0.21	-0.43	**0.66**
	p=0.16	p=0.43	p=0.39	p=0.68	p=0.39	**p=0.16**
MIPEX	0.07	-0.32	0.016	**0.72**	0.09	**0.86**
	p=0.89	p=0.66	p=0.98	**p=0.11**	p=0.86	**p=0.03**
MCP	-0.15	-0.22	-0.06	0.34	-0.03	**0.73**
	p=0.78	p=0.67	p=0.91	p=0.50	p=0.95	**p=0.10**

Significance: *** p<0.001, ** p<0.01, * p<0.05
Notes: CPI is Howard's (2009) Citizenship Policy Indicator and IE and CD Koopmans et al.'s (2005; 2010) individual equality and cultural difference indicators. MIPEX is the Migrant Integration Policy Index 2006 (MPG 2006) and MCP the Multicultural Policy Index (Banting and Kymlicka 2006)

The only consistent pattern of high coefficients can be observed regarding the indicator measuring the use of multicultural frames that is highly correlated with all formal indicators. It seems that not only politics of cultural diversity, but also generous citizenship rights are reflected in public debates by the use of such arguments. This is a confirmation of the argument that formal models are reflected in public debates. Regarding all the other indicators this hypothesis needs, however, to be rejected.

An alternative test is to disaggregate the country indicators and to look at the positions of individual actors towards the issues we have coded. We can then study to what extent positions of and the use of frames by political actors can be explained by country indicators. I run a regression in which I included dummy variables for each country. I then run likelihood ratio tests, which allow us to estimate the contribution of individual or sets of variables to the goodness-of-fit of a model (Long 1997).

In Table A2 we see that the country variables have hardly any impact on positions and the employment of nationalistic and multicultural frames. To contrast these results, Table A2 also displays the coefficients that indicate the influence political actors have on positions and frames. It appears that they have a much bigger impact. It thus is much more important *who* takes positions and uses frames than *where* it is done.

Table A2: Impact of country variables on positions and use of frames, likelihood ratio tests

Positions	*all*	*immigration*	*integration*	*anti-xenophobia*
Countries	2.17	1.85	14.08*	5.32
Political actors	78.73***	82.06***	77.95***	75.08***
Frames		*nationalistic*	*multicultural*	*moral-universalist*
Countries		11.09*	1.23	6.66
Political actors		24.34**	12.98	35.07***

Significance: *** p<0.001, ** p<0.01, * p<0.05

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