

Why Europe's immigration policies are not converging



Are immigration policies in European countries converging? Or do some countries remain more open to immigrants than others? Drawing on a new study, [Erica Consterdine](#) and [James Hampshire](#) write that while it might be expected that globalisation would have encouraged European states to adopt similar immigration policies, there is little sign this has occurred. There is some evidence that policies reflect variations in capitalism across Europe, but the main driver of immigration policy continues to be domestic party politics and national debates in individual counties.

Immigration is at the top of the political agenda across Europe. Polls show it to be among the most salient issues for voters. Mainstream parties struggle to hold together their electoral coalitions around an issue that often divides their core vote, while the rise of populist parties has made it increasingly difficult to downplay immigration. From Brexit to Trump, to the electoral successes of anti-immigration parties in states such as Austria, Germany, Hungary, Sweden, and Switzerland, there is growing political pressure to restrict immigration in many countries.

At the same time, the structural dependence on migrant labour across advanced industrial economies creates countervailing imperatives to admit immigrants. Simply shutting the door is not a feasible policy option for most western states. Some claim that the increasingly similar market demands faced by advanced industrial states have led to convergent policies, others argue that demand for labour migrants and in turn immigration policies vary according to different national models of capitalism.

In a [recent study](#), we examined these competing accounts. Do structural demands or domestic political competition explain policy variation across countries, and also changes over time? We analysed immigration policies across five European countries between 1990 and 2016 using a new [immigration policy index](#) (ImPol) to examine three questions: first, have policies converged; second, do they map onto different varieties of capitalism; and third, to what extent are policies shaped by domestic politics?

Convergence, varieties of capitalism, or domestic politics?

A key debate in immigration policy research is whether policies are converging. According to the convergence hypothesis, similar economic pressures in the advanced economies have led to increasingly similar immigration policies.

Alternatively, some political economists argue that because advanced economies vary in their labour market structures and production strategies, immigration policies should reflect distinct patterns of employer demand. On this view, liberal market economies (LME), coordinated market economies (CME) and hybridised mixed market economies (MME) generate different patterns of demand for migrant labour, resulting in distinct policy regimes. LMEs should be relatively open towards both low and high-skilled migration; CMEs should be open to high-skilled but relatively closed to low-skilled labour migrants; while MMEs should be open to low-skilled, particularly agricultural, workers.

A third approach argues that on an issue as highly politicised as immigration has become, policy is less driven by labour market demand as by domestic politics, including party competition and the framing of immigration in public debates.

Convergence versus patterned variation

Our analysis provides little support for the convergence hypothesis. We found at best mixed evidence that the five countries – France, Germany, Italy, Spain, and the UK – have converged on more or less restrictive labour migration policies. There is considerable policy variation and the five countries have followed different trajectories over time: France and Germany have remained relatively stable, Spain has become much more open, while Italy and the UK have become more restrictive. This hardly supports the claim that the functional pressures of economic globalisation are sweeping countries in a more liberal direction or that advanced economies are converging.

We then assessed whether varieties of capitalism can explain the differences in immigration policies. Liberal market economies such as the UK should be open towards both high and low-skilled migrants. But since 2008, the UK has the most restrictive high-skilled migration policies of any of the five countries, and the most restrictive low-skilled immigration policy (though the latter is partly explained by the large number of EU workers entering under free movement provisions, thus outside of immigration controls).



Border between Austria and Switzerland, Credit: [Kecko \(CC BY 2.0\)](#)

Germany fits the expectation of a coordinated market economy much more closely. Since the 1990s, policy has been restrictive toward low-skilled migration. Yet Germany's high-skilled migration policy has been more volatile over time, with a highly restrictive policy until the early 2000s, then after 2004 one of the most liberal high-skilled migration policies of the five countries.

The expected patterns for high-skilled migration are less clear for mixed market economies, and indeed our results show diverse patterns across France, Italy, and Spain. We would expect these economies to have an open low-skilled immigration policy, and our results confirm this. One of the reasons southern European mixed market economies should have an open low-skill migration policy is the size of their agricultural sectors, which depend heavily on migrant labour, and our results broadly support this expectation.

Politics matters

If there is little evidence of policy convergence and only partial evidence to support the idea that varieties of capitalism explain patterns of migration policy, can cross national variation and changes over time be explained by political competition? We used three case studies to examine this possibility: the UK, Italy, and Germany. We found that party competition and the mobilisation of narratives about immigration, often drawing on national experiences, explained much of the variation and volatility in immigration policy over time.

Changes in UK immigration policy have been powerfully shaped by the dynamics of party competition: policy liberalisation under Tony Blair was followed by policy tightening under his successor Gordon Brown, as public debates about immigration soured, and then tightened further under the Coalition Government's net migration target, as the Conservatives sought to limit the electoral threat of UKIP.

In Italy, restrictive political rhetoric has often co-existed with tacit permissiveness towards irregular immigration, periodically addressed with large-scale regularisation programmes. Within this context, policy development since the 1990s has reflected the dynamics of party competition over immigration, especially the rise of the anti-immigrant Lega Nord party and its direct involvement in various coalition governments. A restrictive, but often volatile, policy dynamic has been driven by the rise of anti-immigrant actors within the context of fragmented coalition politics, where brokering and compromise are the norm.

In contrast, immigration policy in Germany has been relatively stable since the 1990s. Opponents of policy liberalisation in the CDU-CSU successfully mobilised the narrative that Germany is not a country of immigration and depicted the country's post-war experience with guestworkers as a 'failure'. The success of this narrative until very recently is crucial to understanding the relative stability of German policy through the 1990s and early 2000s. This narrative was overcome only once, in 2004, and then only for high-skilled migrants.

Conclusion

Immigration policies have not converged across the five European countries that we analysed, nor is there a consistent trend of liberalisation over time. We do find some evidence that immigration policies reflect patterns of capitalist diversity, but high-skilled immigration policies in particular do not fit what we'd expect, and the number and extent of policy changes over time raises doubts about whether immigration policies reflect stable institutional differences.

Instead, we would argue that immigration policy change can only be understood by paying attention to party politics and national debates in individual countries. Immigration policies move sometimes in a liberal, sometimes a restrictive direction, and their course is set by domestic political conflict. While national varieties of capitalism may set broad parameters for immigration regimes, both the direction and timing of policy change are shaped by political competition.

For more information, see the authors' accompanying paper in the [Journal of European Public Policy](#)

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Note: This article gives the views of the authors, not the position of EUROPP – European Politics and Policy or the London School of Economics.

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