

Discourse, Convergence, and National Traditions: Comparing Canada's and Germany's
Immigration and Integration Discourses

by

Benjamin Christoph Hoffmann
Bachelor of Arts, University of Hamburg, 2012

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Supervisory Committee

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Abstract

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This thesis aims to compare the political discourses of immigration and integration of political parties in Canada and Germany from 2008 to 2013. As some scholars have noted a convergence of immigration and integration policies in Western liberal democracies, this thesis seeks to identify whether a convergence of discourses took place in Canada and Germany, or whether the different national traditions of immigration and integration in Canada and Germany remain stronger in influence than forces of convergence, like international organization or treaties, on immigration and integration discourses. Coming from a critical constructivist perspective and applying a discourse analysis that builds on Lene Hansen and Roxanne Lynn Doty's work, this thesis found that no convergence of immigration and integration discourses in Canada and Germany took place. Different national traditions appear to remain more central for immigration and integration discourses in both Canada and Germany.

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Chapter one: Introduction

Immigration and integration policies in Canada and Germany are an often debated political issue today, both by elite politicians in parliament and in the wider society in general. Whereas many other hotly debated topics of the 20th century, such as socialist alternatives to capitalism, have largely come to an end, issues of immigration and integration are still as popular and divisive in politics today as in the early 20th century in both Canada and Germany (Triadafilopoulos, 2012, p. 1-5) as well as in many other liberal democracies in the 'West'. Immigration and integration raise questions of belonging and nationality, of who 'We' are in a world that seems to grow in complexity incessantly. It is not surprising that such an important issue generates the concerns of not only politicians and the media as prime transporter of politics (Hansen, 2006), but also inspires scholars of many disciplines in the social sciences and beyond to engage with these topics.

As problems and merits of immigration and integration are debated often in the media, in parliament, between and even in political parties, many actors shape what is often referred to as a discourse, sometimes loosely defined as a set of articulations (Diez, 1999). Discourses are central for politics as they contribute to constructing who belongs to a nation or a society, what is seen as feasible, good, bad or desirable in politics. When major discourses change, the policies of a country often do so as well. For instance, the immigration and integration discourse in the United Kingdom (UK) has shifted remarkably over the last years. Before 2005, the immigration and integration discourse was rather inclusive and multicultural, with a so-called race relation framework, a legal framework that helped to govern problems that arose from the interaction of different

ethnic groups in Britain, at its centre (Favell, 2001). However, especially after the terrorist bombings of 2005, a new immigration and integration discourse emerged that focused much more on forcefully integrating immigrants, with which the British culture and state should be defended against perceived cultural threats, like Islam (Somerville et al., 2009; Modood, 2005). This changed discourse led to an overhaul of immigration and integration policies, with the outcome that the UK's immigration and integration laws became more exclusionary and restrictive, as indicated by the Migration Integration Policy Index (MIPEX) of 2011. For example, provisions for family unification, naturalization, and permanent residency acquisition became much more restrictive (Huddleston et al., 2011).

This influence of immigration and integration discourses on debates in parliament and legislation is not seen as a one-way street in academia. Certain events and policies affect integration and immigration discourses, changing the direction of a discourse or altering the categories that are constructed in a discourse. A common example is the global economic crisis of 1929 and the following recession in the 1930s, which is said to have caused the growth of anti-immigrant and anti-minorities sentiments all around the world, especially in Germany. The contemporary economic crisis in the European Union (EU) is perceived to fuel anti-immigrant sentiments, too, with the far right 'Front National' in France having gained more and more ground in the last years (Erlanger, 2012), which is just one example of similar developments in other European states.

This thesis aims to contribute to debates on the relationship between discourse and policy by illustrating the topic of immigration and integration discourses and policies in a comparative perspective. The central part will consist of a discourse analysis, which

is further supplemented by an investigation of some factors that I perceive to be influential on the formation of immigration and integration discourses, like economic growth or recession, unemployment, and the wider history of policy changes in countries. I sum up these factors under the label of ‘policy contexts’. I select two countries for comparison, which are often claimed to be difficult to compare because of their very different traditions: Canada and Germany. However, they are also seen as very important cases for a comparison in immigration and integration research, as can be seen from a forthcoming special issue of the newly founded journal ‘Comparative Migration Studies’. This special issue focuses on comparing the many facets of immigration and integration in Canada and Germany (Bauder et al., 2013), precisely because of their different immigration histories, immigration models, and policy changes that are said by Triadafilopoulos (2012, p. 6-13) to be a sign of policy convergence. For example, he claims that both countries have shifted their citizenship regimes from exclusionary regimes based on ethnicity to more accessible regimes based on the principle of *ius soli*.¹ Triadafilopoulos attributes this change to international pressure to conform to international human right standards.

Explaining this alleged convergence is a puzzle, as Canada and Germany are so different with regard to immigration histories and models. Precisely this puzzle makes these two countries very interesting to compare. Canada is a classical receiving country of immigration, a settler country and today is frequently characterized as being quite open and friendly towards immigration (Triadafilopoulos, 2012, p. 2-4). Germany historically

¹ This Latin term, which can be translated as ‘right of the soil’, describes the automatic granting of citizenship to any person born on a nation’s territory, regardless of the citizenship of the parents. The opposing principle to this is the so-called *ius sanguinis* (right of blood), in which citizenship is granted on the basis of parents’ citizenship, regardless of where one is born.

has been a sending country as well as a receiving country. Unlike Canada however, Germany has not become a country that is friendly towards immigration, although it has been reluctantly open to immigration for some time during the 20th century. Germany is, or at least was until recently, restrictive, exclusionary and sometimes even hostile towards immigration (Sainsbury, 2006; Triadafilopoulos, 2012, p. 120-157). It was not until the early 2000s that Germany changed its paradigm of citizenship (from *ius sanguinis* to *ius soli* with qualifications) and other immigration and integration provisions, whereas Canada changed its immigration and citizenship regimes in the 1960s (Triadafilopoulos, 2012, p. 86-119). While Canada restricted immigration slightly in 2008, Germany opened the door for immigrants a little more (Kolb, 2013). Both Canada and Germany need immigration to sustain their demographic structure, as the populations in both countries are ageing quickly and fewer children are born every year.

Canada and Germany both are federations, in which the provinces or *Länder* have considerable competencies and autonomy, especially with regard to immigration or police (Hooghe et al., 2010). Further, both countries have different political institutions and voting systems, for example, the Westminster parliament in Canada is quite different from the parliament in Germany, which is based on proportional representation. Both countries are capitalist economies with a large service sector, although Canada is quite dependent on resource extraction whereas manufacturing plays a large role in the German economy. Lastly, Canada and Germany were affected by the 2008 economic recession, but, unlike other countries in the world, its impact in both countries was not severe. These differences and similarities make both cases very interesting for a comparison. These

similarities and differences also can be found in terms of language, as I will explain in the next paragraphs.

Two terms that are central to this work and need clarification: immigration and integration.² Immigration in Canada has a different meaning compared to the German translation. In English, immigration refers only to those humans that move permanently from one country to another, hence the individual immigrant is expected to stay permanently in Canada after migration. Temporary foreign workers in Canada are not considered immigrants. Although refugees enter Canada under a different entry category than other permanent immigrants, the fact that refugees gain a permanent residence permit allows me to group them into the immigrant category for this thesis (IRPA, 2014).

In Germany, it appears to me that the translation of immigration, *Zuwanderung* is used more broadly and encompasses all foreigners living in Germany, whether temporary or permanent is not further specified (Statistisches Bundesamt, 2013a). The reasons therefore might lie in the circumstance that immigrants in Germany were mostly temporary workers that became permanent after years of living in Germany almost accidentally; no policy that supported permanent immigration was in place until 2002 (Triadafilopoulos, 2012, p. 120-157). Today, most *Zuwanderung* is fuelled by European citizens, who enjoy freedom of movement, and do not have to commit to stay in Germany permanently to enjoy wide-ranging rights and freedoms. In order not to create confusion, I will use the word *Zuwanderung* whenever I talk about ‘immigration’ in the German context. I will describe the differences and similarities between Canada and Germany in more detail in chapter three.

² With regard to other important terms, policy contexts are noted above, and I will discuss the term discourse with regard to the literature in chapter two.

The meaning of 'integration' is even less clear, there is no consensus about what it entails, what 'successful integration' is, and what it means (Karuman, 2010). 'Integration' in the context of immigration is said to take place in the social sphere. Hartmut Esser describes it as the inclusion of migrants and humans of different ethnicities into societal interactions, for example by the granting of rights, the learning of languages, and the participation in the educational system (Esser, 2001, p. 98). Integration as a topic of scholarly interest developed in the context of the US in the 1960s, researchers then stressing the need of immigrants to assimilate into the host society, which had to culminate in a complete acceptance of and identification with the host society's values (Rauer & Schmidtke, 2001, p. 4-6). It appears that such an understanding of assimilation is today often replaced by notions of acculturation and integration, as many immigrants do not completely assimilate into their host societies, although they can be characterized as integrated with respect to other factors, like participation in the labour market or in the educational system.

Several interrelated but different dimensions of integration can be identified: the socio-economic, the legal-political, and the cultural dimensions. For instance, the legal-political dimension of integration focuses on citizenship, naturalization, or political and social rights, whilst the socio-economic dimension emphasises immigrants' participation in the labour market, or the influence that temporary worker regimes have on host countries and migrants. The cultural dimension of immigration is more complex, but is often said to entail immigrants' acceptance of the host societies' values (Entzinger & Biezeveld, 2002, p. 6-28). As integration is such a complex, contested concept it is not

surprising that different political actors stress different dimensions of integration in debates about immigration and integration policies.

Another important term for this thesis is ‘national tradition’. It is of course often highly contested what counts as a tradition or identity of a nation, or even whether such a thing as a ‘national tradition’ actually exists or whether it is only imagined. An often seen distinction in literature that deals with identity is one between civic nations and ethnic identities or traditions of nations. Countries of Western Europe, like France and England, as well as the US, are seen as nations in which civic or political concepts, like citizenship or political rights, were central for the formation of national identities as the state in these cases is said to have preceded the nation. These civic concepts are further said to be still important for national identities in these countries today. Ethnic nations however are said to largely base their identity on ethnic conceptions of nationhood, like common ancestry or language (Shulman, 2002, p. 2005). Germany and countries from Eastern Europe are often described in this way, as these nations existed as cultural entities before becoming nation states. According to Stephen Shulman, most scholars who employ this distinction argue that these civic and political concepts can be found in all nation states, but vary in importance for each specific national identity (Shulman, 2002, p. 555-557). Shulman further denies the accuracy of often-used academic distinctions between civic and ethnic nations as artificial constructions barely grounded in empirical knowledge today. In his view, nations in the West and Eastern Europe today witness an equal distribution of civil, cultural, and ethnic facets in their national identities, at least if the opinions of citizens on these issues are inquired.

Although Shulman and other scholars argue to stop the usage of national traditions to make conclusions about national identities, there are scholars that argue in favour of a usage of national tradition or national models in order to describe differences between nations that still exist.³ I will focus on national traditions in the sense of national models, and will not speak of national identities, as this concept, as pointed out by Rogers Brubaker and Frederick Cooper (2002), is today lacking any meaningful analytical value, as identity is used today in ubiquitous ways. I hence will not use national identities that talk about belonging and instead use the term national traditions in an almost institutional sense in order to describe the differences that still exist between countries. For this thesis, national traditions are persisting patterns of policies, like citizenship models, and persistently portrayed as a defining concept of a nation, like language. I thus hope to avoid the fuzzy term of national identity, although it might still be residually present. I further understand national traditions not as monolithic blocks that never change, but as entities that evolve over time through political and social practice, while nonetheless being shaped by its past.

What are then national traditions understood in this way in Canada and Germany? For Canada since the 1970s, many scholars point to the importance of multiculturalism for Canada's national tradition with regard to immigration policies. Elke Winter (2007) and Sarah Wayland (1997) point to the role Québec and the US had in the creation of Canada's persistent self-understanding as a multicultural nation, both for founding stories of Canada and as entities that Canada could distinguish itself from. Varun Uberoi (2009) seconds that multiculturalism has played a key role for leading government officials in

³ Some scholars that argue for the need of national models are for example: Etzioni, 2007; Jacobs & Rea, 2007; Dolezal et al., 2010. I deal with their arguments in more detail in chapter two.

their search to create a persistent national tradition for Canada. Will Kymlicka (2003) points out how politics of multiculturalism in Canada were in mutual reinforcing relationships with open immigration policies and citizenship policies based on *ius soli* and easy access. I presume that this persistent amalgam, described by Kymlicka (2003) as “three-legged stool”, makes up Canada’s distinct national tradition with regard to immigration and integration.

In Germany, some scholars argue that a persisting pattern in German immigration policies is the concept of *ius sanguinis* citizenship and a national tradition that is based on ethnicity, which stem from Germany’s tradition as a cultural and ethnic nation before becoming a political one (Brubaker, 1992, p. 1-6, 50-53). Others point to language and culture as important factors for Germans’ understanding of their nation (Shulman, 2002, p. 565-572). However, Peters (2002) argues that ethnicity has been largely discredited in Germany after World War II and the Shoa, and hence is vanishing or already has disappeared as a defining concept of a German national tradition for immigration and integration. Furthermore, German citizenship policy is today a combination of *ius soli* and *ius sanguinis* elements (Hailbronner 2012). Nonetheless, cultural conceptions around language and ethnic *ius sanguinis* conceptions appear to have not completely vanished yet, as can be seen from special status that ethnic Germans from Eastern Europe have in German immigration law (Joppke, 2001) or the emphasis of the German language in recent policy innovation to integrate immigrants (Joppke, 2007).

Methodological approach and method

Language has an important role in the shaping of these dimensions and understandings of immigration and integration. A discourse analysis is very useful to research integration and immigration. The particular approach to discourse analysis used in this thesis is largely inspired by Lene Hansen, but is also indebted to the work of Roxanne Lynn Doty. Hansen (2006) stresses the role language has for discourse analysis, as language is not seen as a neutral medium of interaction, but a highly social and political system. She develops an understanding of language that is grounded in Derrida's view of language as a system of signs, in which signs and language do not possess a meaning of their own. Signs gain meaning by linking or stating difference to other, often juxtaposed signs, in which one sign is usually valued higher than another sign, like 'man' and 'woman'. Although one sign is valued higher, the juxtaposition with the lower valued sign is essential for the complete constitution of the meaning of the higher valued sign. Meaning is formed by positive connections of signs, for example 'woman', to signs such as 'emotional' and 'motherly'. Further meaning is generated by negative differentiation of 'woman' from 'man', stressing the difference of the 'rational', 'intellectual' man and the 'emotional', 'motherly' woman. Although discourses strive towards the creation of stable meanings of signs, this process is highly unstable and in constant negotiation, which leaves room for human agency and points to the political nature of constructions of meaning via language. The category of 'women' was never constructed as entirely negative, and several components of what means to be a woman or a man have changed considerably over the last decades, especially due to feminist political movements (Hansen, 2006, p. 16-20).

Language is important for discourse analysis in political science as societies and politics are highly dependent on written and verbal language for communication. Identity construction and policy formation are processes where language is central, for example in briefing notes, public speeches, debates in parliament, or newspaper articles. In the political process, the distinction between Self and Other is central for identity constructions. However, this should not be reduced to black and white distinctions between the identity of a good Self and an inherently evil and radical Other. For Hansen Otherness has variable degrees and is differing in what the Otherness exactly means. These degrees and differences are then highly influential for policy formation. An extreme example from the time of colonization, when forms of Otherness were more radical than they are often today, can help us understand the mechanisms in which Otherness is created and has implications for policy formation. Most Spanish *conquistadores* gave the inhabitants of the Americas the identities of ‘savages’, but they differed in how exactly they described their identity to be like. One group saw ‘savages’ as non-human and beyond redemption, with no capability for change, hence advocated a policy of genocide. The other group regarded ‘savages’ as human and salvable, but as they were heathen, a policy of forceful conversion was needed to save these savages (Hansen, 2006, p. 34-39).⁴ Although creation of Otherness is not as extreme today, it still creates hierarchies and is influential on policy formation.

⁴ These degrees of Otherness and related policies are very important for a discourse analysis of immigration and integration, as immigrants today are often described by host societies in varying degrees of Otherness and hence other policies are needed. For example, while immigrants from Western countries are largely seen as unproblematic in most Western countries, Muslim immigrants are regarded as much more problematic in Western host societies, with perceived policy needs ranging from integration measures to counterterrorist measures.

Based on these varying identities, Hansen describes three subsets of identities that add to Self and Other constructions in discourses: Spatial, temporal, and ethical identities. Spatial identities involve the drawing of borders between geographic entities, like nation states or regions, and more abstract political categories, like savages, the opposition, and immigrant Others. Temporal identities invoke terms like development, progress, change or stasis. Often the Self is portrayed as progressive or developed, whereas the Other is seen as not developed or backward, as can be seen from the portrayal of Muslim immigrants in many European countries. As in the ‘savage example’, temporal identities also hint to whether the Other is seen as being able to change or not (Hansen, 2006, p. 41-44).

Ethical identities point to responsibilities and duties of political actors to act, or of political subjects to conform, like the responsibility of colonizing Spaniards to save the ‘savages’ by converting them, or the responsibility of immigrants to integrate into mainstream society. Invoking ethical identities, as in situations of genocide, or in order to protect the greater good of human rights, is a powerful move in Western political discourse, as human rights and the illegality of genocide is an essential theme in the identity construction of the Western Self. These identities are often intertwined, for example the ‘West’ is often portrayed as developed and democratic, and hence has the responsibility to help Other ‘underdeveloped’ countries to get them where ‘We’ in the ‘West’ already are (Hansen, 2006, p. 44-45). This emphasizes the importance of the Other in discourses of binary identity constructions, as it simply would not make sense to think of the Self as developed if the Other is not at the same time construed as underdeveloped.

In order to research discourses best, Hansen suggests uncovering smaller sub-discourses in a wider political discourse, with each sub-discourse articulating different spatial, temporal and ethical identities and different degrees of Otherness. Often one sub-discourse can be described as hegemonic, i.e. mostly invoked by powerful actors and widely spread, as opposed to oppositional discourses that challenge the hegemonic discourse. This conceptualization should help to show changes in discourses or the most contested points in debates. From these sub-discourses, the researcher could develop key representations of identities, like the ‘West’, which could consist of “geographical identities, historical analogies, striking metaphors, or political concepts” (Hansen 2006, p. 47). Each sub-discourse should also establish a link to a policy that is distinct from the policies advocated by other sub-discourses (Hansen, 2006, p. 46-48). The category of key representation will be important for my discourse analysis, as it will allow me to identify the sub-discourses of immigration and integration in Canada and Germany.

All these identities and sub-discourses can be researched with and within texts. Hansen sees texts as interconnected carriers of discourses, with reference to Julia Kristeva’s concept of intertextuality. All texts in a particular field of discourse make references, implicitly or explicitly, to other texts, thereby creating or strengthening meaning and their legitimacy. Even texts that do not explicitly talk about policies, like a general newspaper article on a topic or an autobiography, still frame and shape the debate in general, so they have to be considered as part of the larger discourse. Sometimes, non-policy texts can even constitute key contributions to sub-discourses (Hansen, 2006, p. 49-52), as can for instance be seen from the large debate about integration that surrounded

the publishing of a pseudo-scientific book of the ex-politician Thilo Sarrazin⁵ on immigration and integration in Germany in 2010.

Hansen establishes several research models to find and characterize appropriate texts for a discourse analysis. The first model focuses on the official discourse, i.e. speeches and policy documents. She sees these texts as crucial as they are starting points of a discourse analysis and help to structure further research around them. These texts by senior civil servants and elected politicians, like speeches and parliamentary debates rest on the official authority to speak on and shape policies. However, she sees these texts only as a first step for deeper research, as other texts have to be considered, in order to restructure the wider intertextual web that surrounds texts from the official discourse. Consequently, model two includes texts from the media, like editorials, and documents from oppositional parties and other public actors, like parliament speeches, in order to better understand the role of hegemonic and critical sub-discourses (Hansen, 2006, p. 53-55).

Model three focuses on texts from popular and higher culture that are only remotely connected to policies, but deal with a similar topic as the official policy discourse. Model three also includes texts from activist groups that operate and publish at the fringes of the official discourse. Examples would be television shows or theatre plays that are related to a political and/or social issue or texts published by small activist groups or NGOs. Both help to uncover the role of hegemonic and other sub-discourses in

⁵ Mr. Sarrazin, a member of the social democratic party 'Sozialdemokratische Partei Deutschlands' (SPD) and third-row politician, published a pseudo-scientific book '*Deutschland schafft sich ab*' (Germany Abolishes Itself) in 2010. Although full of pseudo-scientific 'proof' of the genetic inferiority of some immigrant groups, other xenophobic rhetoric, and a critique of an excessive political correctness in Germany that silences debates about 'real' problems, it received wide press coverage, became a best-seller, and stirred an intense debate about immigration and integration in Germany (Pflitsch, 2014).

constructing identities and hence shaping policies, as certain identities ostracise some policies, while enabling others. In an ideal discourse analysis, all these models should be included and intertwined, and are only separated for analytical reasons (Hansen, 2006, p. 55-57).

I will select my texts primarily according to Hansen's model one, as I cannot do more than provide a mere starting point in this work. Incorporating of all three models would increase the possible research material immensely, thus I draw only on official texts that defend the policies they propose and texts that argue against policies pursued by the government, mainly from opposition parties. Both kinds of official texts can easily be found in parliamentary debates. In order to get a good understanding of the latter category of texts, I will also add official texts that were published by opposition parties. Although they are technically not part of Hansen's model one, the main opposition party in Germany was part of the government for four year during my research period and the Liberals in Canada often supported the Conservative's minority government. Hence, the strict division developed by Hansen does not really fit this particular discourse analysis. I also intend to show that the immigration and integration discourses are quite contested, hence the inclusion of texts of oppositional parties in my discourse analysis, which are usually the first public contesters in societal debates.

A discourse analysis from a post-structuralist perspective and philosophy, with its close attention to language, texts, and power, is useful to conduct research on immigration and integration, as both areas are fundamentally shaped by language transported via texts. This emphasises my focus on parliamentary debates, by the analysis of which I will highlight how these debates shape the discourse of integration and

immigration in Canada and Germany. The power politicians hold in shaping immigration and integration discourses can also best be illustrated with such a discourse analysis. Language is closely related to power, favouring some political actors over others, even creating or denying the existence of other actors. In this process, language gives legitimacy to some or taking it from other actors, and thereby establishing power relations like hierarchies. Hence, I find that analysing texts as the prime carriers of language is highly insightful for my work. This underscores the importance of my approach to analyse parliamentary debate texts, texts that are probably one of the most powerful in democratic societies. My discourse analysis will further include three additional categories that fulfil a similar role to the ‘key representation’ mentioned above⁶ in order to describe the immigration and integration sub-discourses in Canada and Germany even better. Roxanne Lynn Doty has developed these categories for her discourse analysis. The first one, ‘presupposition’, draws attention to the role of background knowledge, which lingers in every factual statement. This presupposition is needed to make sense of the meaning of any statement and only with it a world with ‘true’ things can be established. ‘Predication’ in turn links subjects in the analysed texts with certain qualities and values them accordingly, similar to what Lene Hansen describes when she writes about identities. With predications, different capabilities and identities can be assigned to subjects in a text. ‘Subject positioning’ then tells us which subject in the text is positioned with regard to other subjects, on a superior/inferior, similar/different, or ally/friend axis. Again, these categories can only be separated for analytical reasons; in practice they all work together (Doty, 1993, p. 305-315). Hence, my

⁶ I draw the idea to use these two scholars from the unpublished BA thesis of 2011 of a fellow student of mine at University of Hamburg, Milan Röseler. A condensed version can be found in Röseler (2013).

discourse analysis will focus on immigration and integration discourses in Canada and Germany according to four categories: ‘key representations’, ‘presuppositions’, ‘predications’, and ‘subject positioning’.

With this tool box of four categories, I want to address the central research question of this thesis: **What similarities and differences can be found in Canada’s and Germany’s immigration and integration discourses and their policy contexts with regard to immigration and integration between 2008, the start of the global economic recession, and 2013?** I kept the research question deliberately broad in order to allow for research that could explore the topic of immigration and integration in Germany and Canada without too many presumptions.

To narrow the research question down and eventually answer it, I developed some expectations during the research project, which I will briefly explain here. Although both countries have different traditions and policy contexts, I was curious whether there were similarities between the discourses of immigration and integration in both countries. I was also curious whether the similarities were strong enough to possibly identify whether it is possible to speak of a convergence of discourses, as Joppke (2007) and Triadafilopoulos (2012) argue respectively for integration and immigration policies. Hence, one expectation I held was that the discourses may converge over the research period. However, perhaps the differences between Canada and Germany prevail, as suggested by the literature about the influence of national traditions on discourse (Banting & Kymlicka, 2010; Dolezal et al., 2010). As a consequence, I also expected, quite paradoxically, that national traditions are still most decisive in shaping the

immigration and integration discourses. I will elaborate on these two expectations in chapter three.

To address these questions and expectations in a critical constructivist research framework, I will firstly look at the literature in the subfield of immigration and integration research for a brief overview of approaches focusing on policy contexts and discourse in chapter two. In chapter three, I will explore on and compare the different policy contexts of Canada and Germany. In chapter four, I continue with the discourse analyses of Canada's and Germany's immigration and integration debates, which will rely on 22 parliamentary debates (twelve in Germany, ten in Canada) that were concerned with issues of immigration and integration. I will conclude by comparing Canada's and Germany's discourses and test whether my expectations outlined here briefly can be verified. I will lastly sum up my findings and points to different avenues research on discourses of immigration and integration could take in the future.

Chapter Two: Literature review

This chapter will introduce and discuss some of the important scholarship that highlights the interaction between discourses and policy outcomes. I will mostly focus on scholarship from the immigration and integration policy field, but will also include literature that is usually considered to be part of immigration and integration research but has nonetheless influenced my thinking about the contested nature of immigration and integration discourses and policies.

Policy contexts and policy formation

Approaches focussing on policy formation and on description of policies are useful for understanding policy contexts. Research here often compares immigration or integration policies with relation to nation-specific characteristics, the so-called national models of immigration and integration policies, as famously done by Rogers Brubaker (1992) for France and Germany. Myer Siemiatycki and Phil Triadafilopoulos (2010) compare immigrant service policies in Ontario and Canada with those in Australia, the United States, the United Kingdom and Germany in order to highlight possible policy innovations for the province of Ontario. Other scholars compare the policies of immigration tests and integration courses for immigrant integration and immigration (Etzioni, 2007). They find a considerable amount of divergence between nations, which seems to stem from older national traditions, institutional arrangements (Dolezal et al., 2010) or specifics of the national debate. In the view of these scholars, it is justified to use national models in research frameworks on policies of immigration and integration (Jacobs & Rea, 2007).

The coherence of national models, however, is questioned by several approaches.⁷

For example, the literature on policy convergence is applied to highlight movement away from coherent national models. Convergence can stem from, among others, elite networking in transnational, epistemic communities (Haas, 1992) that share similar ideas about problems and solutions, harmonization by an international organization like the EU, and emulation, where actors choose actively to copy another actor's approach to a perceived policy problem (Bennett, 1991). For example, Simon Green has found convergence of immigration and integration policies in the European context. He notes that the immigration policies of Britain and Germany are increasingly converging, especially with regard to asylum policies and integration demands. He identifies several exogenous and endogenous pressures for the convergence, like the increased numbers of asylum seekers, security concerns, skill shortages, and not quite successful integration outcomes (Green, 2007).

The concern politicians and the public have for integration has led to a convergence of integration policies in Western Europe. Many countries have established civic integration policies, which rely on integration tests and other measures to assess whether immigrants fit into Western European liberal and democratic societies. The EU

⁷ Another approach that questions the coherence of national models or the nation as the primary unit of analysis is research that focuses on regions and municipalities instead of the nation. The local and regional levels in many countries, especially in federal countries like Canada and Germany, have a considerable impact on policymaking with regard to immigration and integration. For example, the German region of North Rhine-Westphalia (NRW), as part of the EU's system of multilevel governance (Benz, 2011), took the lead in German integration policy long before the national government took up the field, making NRW a prime policy innovator and entrepreneur in Germany. In Canada, for example, Manitoba and Québec have more competences for integration and immigration policy making than other provinces. This leads to large intra-state varieties and complexities in policymaking on immigration and integration. Hence, the idea of coherent national models seems to be quite outdated (Schmidtke & Zaslove, 2013; Schmidtke, 2013a). This sensitivity to intra-national variances beyond national model simplifications appears to be useful to research the policy context of immigration and integration in Canada and Germany.

has had a considerable role in this harmonization, and there is also some evidence that Germany emulated some of the Dutch approaches (Joppke, 2007). This debate about convergence of integration policies takes its starting point with the increased public awareness of integration of immigrants, which is in part due to the arrival of more Muslim immigrants in many Western European countries. This religion, often framed as ‘essentially intolerant and backwards’ compared to the ‘liberal, progressive’ ‘West’ (Kumar, 2010), and people of Muslim faith now have to be integrated into the societies of Western Europe. This kind of integration is partly shaped by the existing church-state relations in each country, but also increasingly by transnational conceptions of citizenship and human rights (Koenig, 2005). This convergence of integration policies that are influenced by transnational factors like human rights regimes is highlighted by Phil Triadafilopoulos as well. In his view, Canada and Germany converged with respect to their immigration and citizenship policies due to, not exclusively though, international pressures that criticized the discriminatory policies in both countries (Triadafilopoulos, 2012, 5-7).

Although often criticized by scholars of convergence and other traditions described above, most scholars who research immigration and integration still point to the importance of national differences, which stem from distinct national factors⁸ in this debate. As both Canada and Germany are federations, a comparison of the specific national structures of federalism is helpful in order to determine how these nation-specific institutions shape immigration and integration policy contexts in these two

⁸ It seems that one of the better ways to research differences and similarities in policy contexts today is the usage of hybrid models, models that picture both a convergence, which still encompass divergent, older traditions (Kolb, 2013). This would be particularly useful if one seeks to highlight the policy contexts in Canada and Germany for immigration and integration, which seemed to have converged in the last decade, although many differences remain.

countries. Christian Joppke and F. Leslie Seidle undertake precisely this in their edited volume, with particular attention to rules of selection and admission, social and economic integration, and civic and political integration in seven federal OECD countries with considerable immigration, like the US and Belgium (Joppke & Seidle, 2012).⁹ With regard to Canada, Keith Banting describes how immigration and integration policies are shaped by the slow, incremental devolution of competencies in this matter from the federal level to the provinces. This created a highly asymmetrical situation in many policy fields. Social and economic integration remains primarily in the hands of the provinces, with the federal level only taking a secondary role, mostly in funding (Banting, 2012). Germany has seen a modestly different development, as Michael Bommers and Holger Kolb point out in their chapter and speak of ‘federal disorder’. Most civic and economic integration happens at the regional and especially the municipal level, while the federal state controls selection and admission. Authority on naturalization is shared between the federal and the regional level (Bommers & Kolb, 2012).

Lastly, legal analysis is central for researching the policy contexts of countries as well. It focuses on the analysis of legal structures and rights for immigrants in the receiving societies. Special attention is given to the legal texts themselves, to the role legal institutions have, or to the legal practice and principles that surround the seemingly neutral legal norms. In Germany for example, immigrant rights, also called foreigner rights, are rather well secured due to the strong role of the German Federal Constitutional Court (GFCC) (Kanstroom, 1993). Access to citizenship, however, is relatively exclusionary, especially for immigrants from outside the EU, albeit some liberalization

⁹ It has to be noted that although both Canada’s provinces and Germany’s *Länder* show a considerable amount of variation and complexity within the nations, the primary mode of comparison is still from country to country, and not from province to *Land*.

occurred in the last decade a highly exclusionary citizenship law from 1913 that was in effect until 1999 was reformed. This stands in contrast to the US, where legal rights of immigrants are not as well protected, but the way to citizenship and full legal protection is much more open than in Germany (Joppke, 2001; Hailbronner, 2012). In Canada, legal analysis can focus on the role legislation, like the Immigration and Refugee Protection Act (IRPA) or the Temporary Foreign Workers Program (TFWP) have for immigration into Canada (Dauvergne, 2003). A legal analysis approach is important if one plans to look at the policy context of immigration and integration in Germany and Canada, especially with regard to the recent, quite hidden, changes of Canada (Kolb, 2013).

The role of discourse

Many constructivist scholars, influenced by the work of Foucault, understand discourse as a “set of articulations” (Diez, 1999, p. 603). However, Foucault deliberately did not offer a more precise definition of discourse, as this would be contradictory to his philosophy, which stresses fluidity and would criticize strict definitions as a mode of exclusion in thinking (Foucault, 1971, p. 23-26). Hence, scholars’ understanding of what discourse means varies slightly and each stresses other parts of Foucault’s as well as other post-structuralist scholars’ work (Diez, 1999; Hansen, 2006; Doty, 1993). However, they argue that the international realm is able to partially shape national discourses. Some scholars in this area of research have dealt with the influence of norms of the international society on nation states. Concepts like norm diffusion that describe a process in which norms, like human rights norms, spread from inter- or transnational settings all around the world into most nation states were developed by constructivists

(Finnemore & Sikkink, 1998). Others could find a considerable impact of international norms on the very structure of nation states or immigrant human rights today by referring to the sociological institutionalism of the Stanford School (Meyer et al., 1997; Finnemore, 1996; Soysal, 2004), or by pointing to the importance of communicative action, like deliberation, in world politics for establishing a consensus on international norms such as human rights (Risse, 2000).

Recent research by Phil Triadafilopoulos has shown that the influence of international norms, which constructivists have claimed and often proven to be a cause for the spread of basic human rights around the world and the establishing of the International Criminal Court (Deitelhoff, 2009), is also influential for immigration and integration policies, at least with respect to Canada and Germany. Under the pressure inflicted by the international norms discourse of non-racism and the discourse of a liberal European society, both countries had to revise their exclusive, racist or nationalistic immigration laws, which Canada did in the late 1970s and Germany followed in the early 2000s (Triadafilopoulos, 2012, 5-7).

As political debates and discourses about immigration are highly contested, and even the meaning what 'good' integration or immigration actually means is far from clear, another approach of International Relations (IR) could be of particular use here. Integration and its meaning would be treated as a socially constructed norm that is seen as highly contested. This social construction is not pre-given, but its meaning develops in a norm generating and norm changing process, which Antje Wiener (2004) calls contestation. In general, a stable meaning can only exist for a certain period of time, after which contestation will continue and contingency returns. Contestation is especially

strong when norms and related policy concepts travel from one societal context, i.e. nation, to another. In this way, the stable societal context, which helps to give meaning to a term, goes missing. This enhances the contestation about the meaning of a concept (Wiener, 2007, 2008). As the meaning of integration has changed in the last decade all over the 'West' (Joppke 2007), this approach seems to be potentially fruitful to explore the changing integration discourses in the 'West'. In Canada, especially in English-speaking Canada and less in Québec with a French-speaking majority, which witnessed a debate about the (not multicultural) charter of Québec Values recently (Blad & Couton, 2009; Peritz, 2014), contestation of the meaning of integration and related policies is weak, centered on an idea of multiculturalism. In the different context of Germany, the meaning of integration is far more contested.

However, in order to understand the role of discourse in two states like Germany and Canada, an IR based approach has some problems. The focus of IR, on the inter- or transnational sphere, international organizations, and internationally operating elite politicians or non-governmental organizations (NGO), is quite different from the focus attempted in this thesis: national party elites and debates in national parliaments that create a more or less nationally distinct discourse in relation to a national policy context. Even more, scholars of comparative politics often note that IR scholars exaggerate the influence of the international level on immigration and integration. They see national factors, like public sentiment, party constellations, or national traditions and philosophies as much more decisive of what shapes immigration and integration policy formation (Joppke, 2001; Favell, 1998; Koopmans, 2013).

There is also literature that focuses on the role of the media on immigration and integration discourses. For example, Anna Korteweg (2008) looks at how the societal debate in Ontario about the introduction of Sharia, i.e. Islamic legal principles, alongside Jewish legal principles, in private arbitration procedures shapes the discourse of immigrant women's agency as constructed by the dominant national and provincial media outlets. Another contribution to this research is to explore how media actors in Germany usually construct the discourse of immigration with regard to economic criteria of immigrants, who are either depicted as potentially contributing to economic growth or as a financial burden to the welfare state (Bauder, 2008a).

Other research stresses the role non-media actors have for the construction of immigration and integration discourse. Some researchers include personal the contributions of key political actors or concerned citizens from the general population. For example, Dirk Halm (2013) focuses on the central role that Islam plays in the German integration discourse by both analysing media frames and interviewing second tier politicians and bureaucrats. Close scrutiny is also given to the word integration itself, highlighting the possible exclusionary undertone that a certain use of the term integration can create (Rauer & Schmidtke, 2001).

Some scholars use official policy and parliamentary documents to research the role these texts have on the creation of immigration and integration discourses, for example when trying to highlight the role of gender equality in integration discourses in several European countries (Yurdakul & Korteweg, 2011), or the impact that immigration had on the discourse surrounding German nationhood (Bauder & Semmelroggen 2009). Teun van Dijk in his critical discourse analysis stress the role societal elite actors, like the

media and politicians, have in shaping the discourse surrounding immigration. His work is important for a discourse analysis that focuses on parliamentary documents, which are, according to van Dijk, the prime texts where the alleged manipulation of the general public or reproduction of elite racism takes place (van Dijk, 1991, 2006). As discourse is further sustained by a variety of kinds of texts, like the already mentioned media, parliament, and policy documents (Hansen, 2006), one should not forget the role elite academic literature has in shaping immigration and integration discourses. Peter Li for example, stresses how academic writing on multiculturalism and integration influences the construction of Canadian immigration and integration discourses (Li, 2003).

I argue that an approach that is based more closely on Foucault has some merits in highlighting some aspects that other approaches cannot highlight equally well. For example, an approach like Lene Hansen's, who bases her work much more clearly on Foucault than for instance Dirk Halm, can help to stress power relations in discourse, by pointing out the discursive webs that shape societal power relations (Foucault, 1982, p.791). Societal power relations take on a life of their own and cannot be understood as to be established by an alleged politically neutral language (Diez, 1999). A discourse analysis based on Foucault can further highlight how power is applied by states and science to discursively create (their) subjects, in this case via citizenship or integration. According to him, subjects can be created by making them objects of science, by nudging humans into turning themselves into subjects, for example via education, and by so-called dividing practices (Foucault, 1982, p. 777-792). Dividing practices are very insightful to understand citizenship and immigration discourses. By dividing some humans, e.g. citizens or 'well integrated' immigrants, from other humans like non-citizens, denizens,

or immigrants with immigration deficits, categories like citizenship and ‘well integrated’ immigrant can be created and become meaningful. This power to divide allows states to construct national identities via discourses, especially legal and political discourses. These discourses, faced by transnational migration that is difficult to control do create unstable national identities, by for example drawing borders and internal ‘Self’/external ‘Other’ distinctions (Doty, 1996). As discourses give meaning to and can legitimize politics and policies as well as construct national identities and citizens, such an approach appears to be fruitful in order to analyze the discourse of immigration and integration in Canada and Germany.

Policy contexts and discourse

After having described some important research that was influential on my work, I will now explore research that treats policy contexts and discourses of immigration and integration as interconnected. Some scholarship combines aspects of comparisons with attention to the role fundamental normative issues play in discourse formation and how fundamental normative issues interact with policies. Attention to these normative issues is important, as immigration and integration policies often lead to very politicized public debates in societies affected by migration, which are inherently normatively charged, questioning identities and what the term integration should mean (Rauer & Schmidtke, 2001). For example, Adrian Favell (1997, 2001) works at this intersection of philosophical discussion and empirical, comparative work. For him, many immigration and integration policies, like citizenship and integration institutions, are highly influenced by a country’s philosophy of integration, which could also be understood as a dominant

discourse. For example, in the citizenship reform in France in the 1990s, normative ideas stemming from the philosophy of republicanism were highly influential in the debate about citizenship and belonging. Consequently, these philosophic principles shaped the cross party consensus that implemented a new, more integrationist citizenship reform. While this process is seen as contingent and not as an inevitable development out of a national tradition, this necessarily imperfect institutionalization of a philosophy will most likely lead to inconsistencies and problems. For example, the strong focus on integration into a national community seems quite out of tune with today's global world, especially in countries of the EU, where borders have been reduced significantly (Favell, 1997).¹⁰ Favell's research points to the interaction of nation-specific philosophical traditions and discourses with immigration and integration policies, which is central for this research project.

Will Kymlicka's work, like Favell's, is insightful for understanding the interaction of discourses deeply shaped by national tradition and policies. He advocates for and defends multiculturalism, an inherently normatively loaded and contested concept, as both a philosophy and a political project against an increasingly hostile public in Europe, as well as among some academic critics (Wimmer, 2008).¹¹ Working

¹⁰ Today, Favell addresses these problems of integrationist philosophies centered on a national community in Europe further by researching transnational elites in Europe. He notes that many immigrants in Europe today are urban, well-educated European citizens that do not plan to integrate via naturalization, but retain their national citizenship, even if they are living abroad for many years, thereby reducing many integration policies and discourses to absurdity (Favell, 2008, 2013). Rainer Bauböck (2002, 2008) shares Favell's attention to the transnational realities today and hence suggests a reformulation of citizenship policies around a stakeholder principle. This principle should be central to citizenship regimes in today's transnational world, alongside with the principles of birth or blood (Bauböck, 2007, 2009, 2010).

¹¹ An important critic of liberal multiculturalism as proposed by Kymlicka is Bhikhu Parekh, who however seems to propose an immigrant group focused version of multiculturalism. He, for example, criticizes a moral monism of liberal multiculturalism (Parekh, 2006) and too little attention to cultural diversity (Parekh, 1997).

comparatively with Keith Banting, they could uncover how the different national contexts and discourses about multiculturalism on both sides of the Atlantic translated into different public opinions about multiculturalism and policies (Banting & Kymlicka 2010). As the nature of multiculturalism is so normative and contested, they point out that the alleged backlash against multiculturalism in Western Europe is more due to a crude understanding of multiculturalism in the public debate, which focuses only on immigrants that are both ethnically and culturally different. If one chooses to criticize multicultural policies, one should better be aware of all the policies introduced to protect national minorities, which have not been restricted at all lately, as the Canadian example shows quite well (Kymlicka 2010, 2011, 2012). Kymlicka's work helps us to understand how different national traditions on both sides of the Atlantic and the discourses therein influence policies on immigration and integration.

Another area of scholarship, which focuses on debates about citizenship, multiculturalism and integration in both politics and academia has led philosophers and social scientists to uncover a peculiarly interesting convergence of policies in Western liberal democracies. Instead of introducing or keeping multicultural policies as the way to organize the interaction of immigrants and host societies, many liberal European states turned towards exclusive and illiberal policies with regard to immigration and integration around the turn of the century, some earlier, like Denmark and the Netherlands, some later, like Germany. Also important is a discourse that depicts newly arrived immigrants in Western states, often of Muslim faith, as inherently illiberal and thus a threat to the Western, liberal Self (Joppke 2007; Bauböck 2010). This discourse about the Otherness of Muslim immigrants is central for integration policies in Europe, as can be seen, for

instance, in the proliferation of civic integration courses. Hence, these courses and other measures, which are not quite consistent with (multicultural) liberal thought, are legitimated by the civic integrationist discourse, and are applied to liberalize newer and older immigrant cohorts and to coercively integrate them into the 'liberal, democratic Western' nation state.

This turn in the Netherlands, the UK, Germany, and other liberal, democratic European states in the early 2000s towards policies of forceful immigrant integration is sometimes referred to as 'liberal nationalism' by Adam Tebble (2006), as it aims to protect the liberal, multicultural nation by coercive nation building practices of integration. 'Schmittian liberalism' is another label given to these practices by Triadafilopoulos (2011), as the aggressive integration mechanisms are seen as a tool to distinguish between friend and foe. Here, the 'Schmittian liberal' discourse influences integration policies that are introduced to select and create a liberal, Western, democratic friend, the good immigrant that could be allowed in and integrated via citizenship test, against a non-liberal, barbaric, terrorist foe. In order to sustain the liberal national Self, the foe has to be scanned and selected by forceful integration policies, policies that in turn are legitimized with reference to the 'Schmittian liberal' discourse. This approach describes well the interaction of exclusionary discourses and integration policies.

Jane Jenson's (1989) notion of a universe of political discourse and societal paradigms in a society, and the way these two concepts shape policies, are potentially insightful. The universe of political discourse is a realm, in which actors with a variety of identities, like age, gender, or employment, struggle for recognition and representation of their identities in the public. These identities are not pre-given, but emerge in this

interaction of actors in the universe of political discourse. In this struggle, differing levels of power between actors lead to the outcome that some identities supported by higher levels of power have it easier to institutionalize their identities and stabilize the meaning attached to them. This institutionalization leads to what Jenson calls a social paradigm. She defines this social paradigm as a set of practices as well as a system of meaning with views of human nature and what counts as proper social interaction. These social paradigms often have tremendous influence on the formation of policies to address issues raised by them (Jenson, 1989, p. 237-240).

Jenson analyses how the wider discourses on gender in France and the US prior to World War I led to different societal paradigms on gender roles, which in turn had a strong impact on policies for women's work and women's political participation. The discourse in the US around identities of gender led to a dominant paradigm that ascribed women the role of mothers and citizens, while silencing the role of women as workers. Hence, policies in the US were focused on protecting women as mothers and enfranchising them, but no measures for the protection of female workers were introduced. Quite contrary, the dominant paradigm in France emphasized the role of women as workers and as 'citizen-producers', but silenced those voices that sought political rights. This led to good protection of women in the workplace and as mothers in families led by a man, but not to independent political rights (Jenson, 1989, p. 245-257). Jenson's work could help us to better understand the connection of discourses and policies and the influence national tradition or paradigms have on discourses.

The approach that will guide my research is the research framework developed by Lene Hansen in her book 'Security as Practice', as introduced in the introduction. She

bases her research on Derrida's view of language as a system of signs, that have no meaning in themselves, but gain meaning by linking or stating difference to other, often juxtaposed signs, with one sign usually being valued higher than another sign (e.g. 'man' and 'woman'). Although discourses try to stabilize meanings of signs, this endeavour is, according to Foucault, highly unstable and in constant negotiation. She also includes Kristeva's concept of intertextuality, which stresses the social, connected, and shared nature of language and texts. Hansen links discourse and policies via identities, which assists us well in ascertaining the interaction of policies and discourses. Discourses shape states' identities, which in turn then allow for some policies and preclude the establishment of other policies.

This chapter introduced and discussed some of the core literature that is important for exploring immigration and integration discourses with attention to policy contexts that shape the background of these discourses. For example, an important debate is taking place between scholars of convergence, like Triadafilopoulos (2012), and researchers that stress the importance of national traditions for immigration and integration policymaking, like Kymlicka and Banting (2010). Important research for this thesis include those scholars that explore discourses of immigration and integration, like Bauder (2013), those that try to establish a discourse analysis that is more closely based on Foucault and other post-structuralists, like Hansen (2006) and Doty (1993), and those that attempt to link policy contexts to discourses, for example Jenson (1989) or Favell (1998). The policy contexts of Canada and Germany will be illustrated in the next chapter.

Chapter Three: The policy contexts of immigration and integration

This chapter describes the recent history of immigration and integration and general trends till 2013 in the policy contexts of Canada and Germany in order to outline the background in which the discourses of immigration and integration are situated. I understand policy contexts of immigration and integration as a combination of factors that influence the formation of immigration and integration discourses, like economic growth, unemployment, and trends in immigration and integration policy making. For this, immigration laws and integration policies, immigration figures, a data set called MIPEX (Migration Integration Policy Index) that compares most Western countries on these policies (Huddleston et al., 2011), and some economic indicators, like GDP change and unemployment rates, will help me to describe the policy context of immigration and integration in Canada and Germany. I will show that the policy context in Canada, despite some similarities, is quite different from the German one. Both countries have different legal traditions and historical legacies of immigration and integration. Hence, I will start by comparing the legal provisions of immigration and integration in both countries.

The policy context in Canada

There are several laws that govern immigration into Canada. Central for immigration today is the ‘Immigration and Refugee Protection Act’ (IRPA) of 2002 (IRPA, 2014). It replaced the Immigration Act of 1978, which meant a major paradigm shift in Canadian immigration history, from an immigration regime that favoured European immigrants over Africans or Asians to a non-discriminatory one in terms of

country or region of origin, but which nonetheless still selects heavily on the basis of economic criteria. Other goals of the 1978 Immigration Act included the promotion of refugee protection and family reunification, as well as the facilitation of demographic and economic goals. It set up four central entry categories of ‘refugees’, ‘dependent family class’ (i.e. closer family, like children), ‘assisted relatives (like grandparents) and ‘independent immigrants’. Only for the latter group of immigrants the points system was used to determine their eligibility for immigration (Triadafilopoulos, 2012, p. 115-119). Some of these entry categories, like ‘refugees’ are still in use today, others were renamed. In addition to the points system, the Immigration Act selected independent immigrants also based on perceived labour market needs. However, the Immigration Act was criticized as not being able to attract the economic immigrants Canada needed (Bauder, 2008b, p. 291-293). This problem, among others, was addressed but not necessarily solved in the new 2002 Act. After several years of planning and consultation, the IRPA was legislated (Bauder, 2008b, p. 293-296).

Catherine Dauvergne describes this new law as an attempt to make Canada better suited to meet the challenges of globalization, although she does not claim that the IRPA caused a significant change of Canada’s immigration paradigm. For example, what was largely a bureaucratic practice before was made into law, for example with regard to refugee determination provisions and how a family can be defined. It is also said to have tried to reduce discretionary decision making of ministers or high-level bureaucrats, but not quite achieved this goal, as this topic remains a concern in immigration politics in Canada today (Dauvergne, 2003, p.727-733).

Others emphasise that the aim of the IRPA was to improve Canada's labour force and hence to strengthen the Canadian economy by shifting the emphasis away from refugees and family reunification towards economic immigration (Neborak, 2013, p. 4-8). This led to a novel treatment of economic immigrants in the IRPA. In the newly created 'Federal Skilled Worker Program' (FSWP), eligible economic immigrants are those whose skills and skilled labour experience fall under the 0, A, and B categories of the National Occupation Classification (NOC). A revised points system was used to determine immigrants' eligibility, but unlike before no further labour market concerns were taken into account as this latter aspect was deemed as backwards and state interventionist in times of quickly changing economic situations and free markets (Variyam, 2007, p. 472-474; CIC, 2010, p. 19-24).

All these changes were introduced in order to enable Canada to get the 'best and the brightest' immigrants to build a 'great' future for Canada (Bauder, 2008b, p. 291-296). According to the IPRA, entry into Canada is structured like this: individuals who seek entry to Canada today are characterized as either 'visitors', like 'international students', 'temporary foreign workers', or 'tourists'. Those who can stay permanently are put into the group of 'permanent immigrant classes', i.e. 'family sponsored immigrants', the so-called family class, 'refugees' or 'protected persons', and as described, 'economic immigrants' in the economic class. After being accepted, permanent immigrants are granted a permanent residence permit (IRPA 2014) and can apply for citizenship after having lived in Canada for at least three years consecutively, as long as they are able to speak English or French at an adequate level, and show adequate knowledge of Canada

as well as of the responsibilities and privileges that follow from being a Canadian citizen (Citizenship Act 2014).

As mentioned, in the 2002 version of the IRPA, potential immigrants were judged mainly on the points system, which was revised to include mostly so-called “human capital” measurements, as education and age, in order to judge the potential economic contributions of immigrants in the future and less so labour market concerns. The point system led to a large increase in applications and hence a massive backlog of applications (O’Shea, 2009, p. 12-17). As a consequence, the IRPA has been altered several times, most noteworthy with Bill C-50 of 2008, a fiercely debated budget implementation bill. Bill C-50 tightened the rules for applicants under the FSWP in order to remove the pressure on the system. Immigrants are again selected on the basis of occupations that are needed in Canada in a first step, as it was the case before 2002. Only after this step is passed, the points system is used to determine immigrants fit for Canada’s economy. By this, the government wanted to make sure that the newly arrived immigrants find jobs that match their skills¹² and hence contribute to Canada’s economic growth (O’Shea, 2009, p. 22-24; Ashkar, 2011, p. 154-158).

Other options for Canadian employers to get workers from abroad and to go around the backlog problem of the FSWP are the so-called ‘Temporary Foreign Worker Programs’ (TFWPs), like the ‘Seasonal Agricultural Worker Program’ (SAWP), the ‘Low Skill Pilot Program’ (LSPP), now called ‘Stream for Lower-Skilled Occupations’,

¹² This problem is often illustrated with reference to the alleged ‘taxi drivers in Toronto with a not recognized PhD’. However, the solution of the Bill C-50 might not work, as many occupations on this ‘occupations in demand list’ are occupations with high regulatory barriers, like engineers (Omidvar 2010). This was the problem that led so many PhD engineers before 2002 to end up as taxi drivers in the first place. Scholars often demand a solution, i.e. easier credential recognition. But this remains to be provincial legislation, not federal, hence quick solutions to this problem are not in sight (Banting 2012).

and the 'Live-in Caregiver Program' (LCP). These programs have become more important since 2002, and appear to be one way to circumvent the traditional immigration processes with huge backlogs and to quickly fill labour shortages to the benefit of Canadian companies. Not surprisingly, businesses are in favour of these temporary programs as for their higher flexibility and temporary nature. Some scholars criticize that the legal protection for humans working in these temporary worker programs is weaker than in the FSWP, making temporary foreign workers more prone to exploitation and abuse than is the case with the permanent residents admitted under the FSWP. Some of the TFWPs, like the LCP, provide an avenue for workers to apply for, or be eligible for, permanent immigration. Other programs, like SAWP, are criticized as they do not allow these temporary visiting workers to apply for permanent residency, even after years of working in Canada, thus creating a precarious class of permanently temporary workers (Hennebry, 2012, p. 4-22).

Another important component that fuels immigration to Canada is the so-called family class or family reunification. Immigrants arriving in the family class share of Canada's total immigration peaked at approximately 44 percent in 1993 and today is still responsible for 25 percent of all immigration to Canada (Statistics Canada, 2011d). Sponsoring relatives is seen as central component for immigrants' social integration into the Canadian society. Whereas the reunification of dependent children and spouses is mostly regarded as unproblematic, the sponsoring of immigrants' parents has become more controversial recently. As noted above, Canada today wants to attract mostly those immigrants that will benefit the country economically (Neborak, 2013, p. 4-8). However, the sponsoring of parents comes with alleged high costs for society, because many

parents are said to claim welfare benefits or social housing after the sponsor period ends. A massive backlog of application has developed in this class as well. Hence, the Canadian government wants to reduce the number of those eligible to apply for family reunification by raising the income requirements and sponsorship period for parents with its so-called 'Action plan for faster family reunification' (Citizenship and Immigration Canada, 2013a), thereby excluding poorer immigrants from family reunification.

The Provincial Nominee Program (PNP) has become more important for immigration to Canada since 2002 (O'Shea, 2009, p.18). Provinces that were usually not the prime targets for immigrants, like the Atlantic Provinces or Manitoba negotiated competences with the federal government, which allowed them to fast track certain types of immigrants they deem to be in high need for their provinces' economic well-being and of whom the provinces hoped they would stay. The PNP negotiations were inspired by the ability of Québec to negotiate wide-ranging competencies on this matter. In 1991, the federal government agreed to give way more autonomy for selecting economic immigrants to Québec compared to the other provinces (Banting, 2012, p. 86-88; Seidle, 2013, p. 4-6). As a consequence, the share of immigrants who moved to other provinces than Ontario and British Columbia has increased. Especially Manitoba is said to have profited from the PNP, whereas the outcome for the Atlantic Provinces is mixed. Since 1998, when the first nominee programs were introduced, many duplications between the federal and provincial level, differing minimum standards, as well as unclear responsibilities have emerged, which led the federal government to again take a greater role in the PNP development in the future (Seidle, 2013, p. 7-20).

As the PNP contributes to the maximum intake level of immigration to Canada as whole, the success of the PNP in attracting immigrants, through which today a quarter of all economic immigrants enter the country, goes at the expense of the numbers admitted via the FSWP, and thus most likely increases the backlog problem of the FSWP. This success, as well as some problems of fraud, has led the federal government to push for greater integrity and coherence in the models of the provinces. In order to make sure that the PNP does not circumvent the role of Ottawa in selecting immigrants even further, the federal government introduced basic language requirements to the PNP, which all provincial programs had to incorporate in 2009. Tensions over a cap for the PNP remain, as the government tries to leave the immigration targets of the PNP as they are, whereas the provinces want to raise the PNP level at the expense of other federal economic immigration programs (Seidle, 2013, p.1; Banting, 2012, p. 89-90).

Immigration patterns

The changing immigration provisions in Canada have shaped the patterns of immigration to Canada. For example, according to Statistics Canada, from the six years between 2001 and 2006, roughly 1.1 million immigrants came into the country, an increase of ca. 20 percent compared to the six years before. Including earlier immigration cohorts, in 2006 6.1 million humans born outside Canada lived permanently in Canada, leading to an immigrant share of almost 20 percent (Statistics Canada, 2009a). Most immigrants came from Asia with 2.6 million (especially from China with Hong Kong, India, and the Philippines) and Europe with 2.3 million people (Statistics Canada, 2011a). More than half of these 6.1 millions moved to and lived in Ontario in 2006. Altogether,

almost 3.4 million immigrants live in Ontario and alone 580 000 moved there between 2001 and 2006 (Statistics Canada 2009b). From the 1.1 million immigrants between 2001 and 2006, 830 000 were visible minorities, i.e. of non-white origin. Including earlier immigrant cohorts and established Canadians, the number of visible minorities in Canada totals at five million or almost a sixth of the overall population (Statistics Canada, 2011b).

The census in 2011 demonstrated an increase in immigration to Canada. Another 1.1 million immigrants came between 2007 and 2011 in just five years, making Canada the home of 6.8 million humans not born in Canada. Hence, the immigration population saw a net growth of approximately 700 000 since 2006. By 2013, Canada had the second largest share of foreign-born humans in the OECD with 20 percent, trailing only Australia, and being significantly higher than Germany with 13 percent. Asia remains the single largest sending region, with almost 60 percent of the immigrants between 2007-2011 coming from there. This has led to an increase of visible minorities to now 19 percent of the overall population (Statistics Canada, 2013a).

Integration

To recall, integration usually includes facets like the granting of rights to immigrants, immigrants learning the host country's language, and the participation of immigrants in the educational system (Esser, 2001, p. 98). The federal government mostly sets the legal framework and funds the projects of its partners that operate on the provincial and local levels.¹³ In intergovernmental negotiations with Ottawa, Québec

¹³ For 2012-2013, the federal government has announced \$600 million for integration programs, the so-called settlement services in Canada (Citizenship and Immigration Canada, 2013b).

received the farthest-reaching autonomy for settlement services in the 1991 Canada-Québec immigration agreement. The most important settlement services that are used for immigrant integration in Canada are language courses and job search help programs. In British Columbia and Manitoba, the autonomy is high as well, giving these two provinces the prime responsibilities for the delivery of settlement services in their territories. In Ontario, a tri-level model was negotiated in 2005, in which the federal government, the provincial government and the City of Toronto, the biggest immigrant-receiving city in Canada, cooperate on a joint steering committee for settlement services. However, the federal government has the final decision making power in and is directly responsible for the delivery of settlement services through its regional offices in Ontario, and does not seem willing at the moment to devolve more responsibilities to the provincial government. Outside Québec, the federal government also often works directly with third parties, like immigrant service provider organizations and ethnic groups (Banting 2012, p. 89-93).

As already noted in the discussion of integration in the introduction, integration is harder to measure numerically, as it is such a complex, contested, multidimensional social construct. It can encompass indicators as the varying ability of an immigrant to speak the host country's language, income and employment disparities between immigrants and non-immigrants (Frenette & Morissette, 2005), or the adherence of immigrants to the social norms and way of lives of the host society (Entzinger & Biezeveld, 2002, p. 6-28). In order to give the reader at least some understanding of integration in Canada, I will take a look at naturalization rates as indicators for integration, as acquiring the citizenship of a country is seen as an important step for

integrating into Canadian society. Out of the 6.1 million foreign-born immigrants who lived in Canada in 2006, 4.7 millions already had acquired Canadian citizenship, sometimes with cases of dual citizenship (Statistics Canada, 2011c). In 2011, out of 6.8 million foreign born immigrants, six million were eligible for naturalization and 5.1 million did so, leading to a naturalization rate of 85 percent. This number is highest in the Western world, with Australian immigrants naturalizing at a rate of 74 percent and US immigrants at 42 percent, which Irene Bloomraad traces back to greater state involvement in the promotion of naturalization of immigrants in Canada (Bloomraad 2002, p. 194-196). Only 14 percent of those who naturalized had dual citizenship (Statistics Canada, 2013b).

Many facets of the immigration and integration policy context in Canada are summarized in the MIPEx, which is a data set comparing immigration and integration policies in many OECD countries. It gives countries scores from 0 (no immigration facilitating policies) to 100 percent (ideal best practices) for certain specific policy categories of migration and integration policies in general.¹⁴ In the 2007 version of MIPEx, Canada altogether scored the fifth highest with 67 percent. Canada did very well at integrating immigrants into the labour market (80 percent) and family reunion policies (76 percent), both with great legal protection and comparable lax eligibility requirements as a means to improve immigrant integration. It also had comparably easy access to naturalization (67 percent) and embraces dual nationality, and the anti-discrimination policies (85 percent) to improve immigrant integration were far-ranging application and

¹⁴ The MIPEx says nothing about how well integration actually works in these countries. For example, Sweden scores first with its mainstreaming approach to immigration and integration, but it has some issues with parallel societies, social segregation, and discrimination of immigrants (Brown, 2013, Hobson/Hellgren, 2008).

strong equality policies. The political integration of immigrants outside naturalization remained quite low however, with only 32 percent of what could have been possible, as Canada, for example, does not grant voting rights to their non-citizen immigrants (Niessen et al., 2007, p. 32-37).

In 2011, Canada's place in the MIPeX rating improved slightly, especially as data on the influence of educational policies on immigrant integration was added, and hence scored third behind Sweden and Portugal with 72 percent. Most immigration and integration policy categories stayed the same, but labour market integration increased slightly (to 81 percent), as the recognition of credentials was made slightly easier. The largest increase of Canada in the ranking of the MIPeX stems from education policies (71 percent), which were not measured before, a category where Canada does exceptionally well, second only to Sweden. Canada's provinces have intercultural learning classes for all students, additional high-level language acquisition if needed, and easy access to primary and secondary education for all students, regardless of status. Canada's excellent ranking in the MIPeX shows how immigrant friendly the country is compared to other countries in the 'West', as the average score in the MIPeX is around 50 percent of the ideal best practice (Huddleston et al., 2011, p. 11, 44-49).

Lastly, Canada's economy has a role in shaping the immigration policy contexts, as immigration and public sentiment about immigration are often said to be related to unemployment or economic performance. While the possible ways of influence are numerous, I will look at economic growth and unemployment from the 2008 recession until 2013 to outline the economic situation in Canada. At the end of 2008 and at the beginning of 2009 the country experienced a severe dip in GDP, as the country's

economy contracted at a rate of 1-2 percent per quarter, from 1.480 billion dollar to 1.420 billion dollar. This collapse hit all major industries in Canada, including the oil and mining industry. However, the latter recovered quickly, over the following years, unlike manufacturing, which has not really recovered yet. During the following years, annual growth was around 1-3 percent, totalling to a GDP of 1.600 billion dollar in 2013. Unemployment rose to roughly 8.5 percent after the 2008 shock, and slowly declined back to 7 percent in 2013 (Statistics Canada 2012, 2013c, 2014a, 2014b). Overall, the economic conditions in Canada have been quite similar in Germany since 2008, which will be described in the next section.

The manufacturing industry's share of Canada's GDP continued to decrease from 18 percent in 2000 to 12 percent in 2011, which can be seen as an effect of the 2008 financial crisis, but also as an outcome of a long, ongoing trend in many OECD countries (Baldwin & Macdonald, 2009, p. 17). Employment in manufacturing did decline as well, down to 10 percent in 2011 from 15 percent in 2000 (OECD, 2012, p. 4-5), whereas the service sector was and still is the largest employer in Canada. The loss of employment in manufacturing can be related to a higher productivity in this sector on the one hand (Baldwin & Macdonald, 2009, p. 11-24) and the resource extraction boom on the other: more people are today employed in this sector than in manufacturing. Alberta, the prime resource extracting province, increased its relative share of newly arrived immigrants and its share in Canada's overall GDP, leading to the outcome that Alberta is now the richest province in Canada. Ontario, Canada's heart of the manufacturing industry, saw its share of newly arrived immigrants and of Canada's GDP decrease (OECD, 2012, p. 4-5; Seidle, 2013, p. 7).

The policy context in Germany

Several laws govern *Zuwanderung* and integration in Germany. Central for *Zuwanderung* is the *Zuwanderungsgesetz* (Immigration Act) of 2004, which was introduced after a long fight between the centre-left government and centre-right opposition in which even the GFCC was evoked (Triadafilopoulos, 2011). This *Zuwanderungsgesetz* introduced many changes to law governing *Zuwanderung*, for example created the Residence Act (*Aufenthaltsgesetz*), the law that mainly governs how foreigners are treated in Germany. It stressed language requirements for permanent residence status and introduced integration courses. Although it was planned to be a major shift to liberalize German *Zuwanderung* policies, the intense conflict that emerged between pro-*Zuwanderung* centre-left and contra-*Zuwanderung* centre-right preceding this law led to the outcome that only few measures that furthered and facilitated *Zuwanderung* were introduced. For humans moving to Germany from other EU countries, the 2004 *Zuwanderungsgesetz* introduced a Freedom of Movement Law (*Freizügigkeitsgesetz*), that guaranteed free movement and work permits for most citizens of the EU (ZuwandG, 2004; Hailbronner, 2012). The praxis of family reunification and of hiring temporary foreign workers, for example in agriculture, was left mostly unchanged.

Refugees are dealt with in another law, the Asylum Procedure Act (*Asylverfahrensgesetz*), which was amended for example in 2007 with EU-led harmonization of refugee policies. A specialty in the German *Zuwanderungsgesetz* is the entry category of *Spätaussiedler*, which are individuals who have German ancestry, but have lived outside Germany for several decades or even centuries. The Federal Law on

Refugees and Exile (*Bundesvertriebenengesetz*) governs this entry category. Many immigrants in this group came to Germany from Eastern Europe after the end of the Cold War. They were entitled to language courses and almost immediate naturalization (Kanstroom, 1993). In recent years, these rules have been tightened, making this entry category now more similar to ‘normal’ immigrants, although *Spätaussiedler* still enjoy more rights, for example funding for moving to Germany (BVFG, 2013).

The Green Card program of 2000 that allowed for labour recruitment in several business branches like the IT industry, but remained rather unsuccessful in attracting immigrants, further facilitated *Zuwanderung* into Germany. Germany introduced another *Zuwanderung* program in 2009, the Blue Card, which was another EU initiative, with similar aims as the Green Card program (Kolb, 2013). All these policies, especially the Blue Card, meant a liberalization of *Zuwanderung* policies into Germany, mostly introduced in order for Germany to take part in the worldwide race for the smartest and most successful workers, in which the Anglo-Saxon nations were seen as leading. Although it is too early to judge the overall success of this program, it has to be noted that until December 2013, the Blue Card program was only able to attract roughly 3000 highly skilled workers from non-EU countries (Sauer, 2014).

Immigration patterns

Despite these comparably restrictive legal provisions, *Zuwanderung* rates into Germany were quite high in the last years compared to Canada in absolute numbers. According to the Federal Statistical Office (*Statistisches Bundesamt*), from 2000 to 2006, 660 000 to 870 000 humans settled in Germany annually, totalling to roughly 5.5 millions

for these seven years (Statista, 2014a). However, many emigrated the country as well, as for example temporary workers in agriculture, leaving Germany with a net-*Zuwanderung* of 985 000 for 2000-2006 (Statista, 2014b). As a consequence, the percentage of foreigners largely stayed the same from 2000-2006, ranging from 8.1 to 8.9 percent of the total population (Statistisches Bundesamt, 2013b).¹⁵

In the next six years *Zuwanderung* grew slightly from 680 000 in 2007 to 1.1 million in 2012, totalling to 4.3 million (Statista, 2014a). As 2008 and 2009 even saw a net-emigration, net-*Zuwanderung* totalled to 752 000 in this time period (Statista, 2014b), almost similar to Canada net-*Zuwanderung* in absolute numbers. EU member states and other European countries, Turkey included, mostly fuel *Zuwanderung* to Germany, a pattern that did not change in these years as well. Other regions only had minor contributions to the overall shape of *Zuwanderung*, with Africa, America and Asia amounting to 1.5 million immigrants, compared to 6 millions from Europe (Statistisches Bundesamt, 2014a). Most immigrants settled in the three most populated and economically most important *Länder* Bavaria, NRW, and Baden Württemberg. The number of immigrants in NRW and Baden Württemberg rose by 150 000 to 1.96 and 1.32 millions respectively in these years. Bavaria saw the largest increase in absolute numbers, 220 000 since 2006 to 1.3 millions (Statistisches Bundesamt, 2014b). The share of immigrants of the total population did not change until 2011, from 8.8 percent to 7.8 percent, when a new census was conducted and methods of collecting data changed. It rose slightly to 8.6 in 2013 (Statistisches Bundesamt, 2013).

¹⁵ The numbers of the Federal Statistical Office vary considerably from the numbers of the OECD as mentioned in section 3.1, which calculated 13 percent foreigners to Germany's overall population, as the OECD's category is wider than the category of the Federal Statistical Office.

An important category of *Zuwanderung* statistics in Germany is the category of ‘migration background’ (*Migrationshintergrund*). This term is coined to include immigrants, even after naturalization, their children and grandchildren (second and third generation) born in Germany, who did not experience migration themselves, and individuals, who have at least one parent with migration experience. In 2012, this group made up 20 percent of the population, tending upwards, as this group is especially strong amongst the younger population. Not surprisingly, this group is strongest in the immigrant rich NRW, Baden-Württemberg, and city-states like Berlin, and considerably smaller in East Germany (Statistisches Bundesamt, 2012).

As mentioned in section 3.1, measuring integration numerically is not an easy task, as integration has so many dimensions. To understand integration in Germany, one can look at its naturalization rate. The rate is very small compared to Canada: Only 1-2 percent of the total immigrant population of 7.5 million chose to naturalize between 2002 and 2011, peaking in 2000 with 2.6 percent (Hailbronner, 2012; Statistisches Bundesamt, 2014c). These numbers look a little better for the individuals with migration background. Out of the 15-16 million people in this group, approximately nine million had German citizenship (Mediendienst Integration, 2014). Of this group, 8.6 percent already had dual citizenship, especially when one of the parents came from an EU country (Statistisches Bundesamt, 2014c), as EU directives on citizenship demand this. This shows clearly that Germany tolerated dual citizenship longer than publicly announced by centre right parties.

Integration

As mentioned, integration is also partly governed by the *Zuwanderungsgesetz* and Residence Act of 2004, for instance with regard to the requirements of non-EU immigrants to take integration courses. This was specified in a special Integration Course Legal Ordinance (*Integrationskursverordnung*) in 2004, where all the demands and support to integrate were collected (IntV, 2013). So far it appears that the only contribution to integration on the federal level are the integration courses. Several *Länder* and cities have started integration policies and programs of their own, as for example North Rhine-Westphalia (NRW) or Berlin. Their laws try to enable participation of immigrants and establish frameworks for on-the-ground help centers in a far more precise and sophisticated way than the federal laws (Participation and Integration Act, 2012). Especially the almost complete control of the *Länder* over the education system gives them a central role in integration legislation (Bommes & Kolb, 2012). In 2007, the federal government pledged to fund integration services annually with € 750 million (FAZ, 2007), however in the 2013 budget for the federal level, only roughly € 275 million seemed to have been assigned for integration in 2012 and even less, € 250 million, in 2013 (Bundeshaushaltsplan, 2013), which could lead the reader to the conclusion that integration measures were, despite lip service, not high on the government's agenda.

The most significant change with regard to integration law took place with the introduction of a new Citizenship Act (*Staatsangehörigkeitsgesetz*) in 2001 (StAG, 2013). It is often said to mark a paradigm shift from *ius sanguinis* to *ius soli*. Moreover, the StAG refers to naturalization of foreigners as to be in the national interest, which was

not the case under the old law of 1913 (Hailbronner, 2012). Especially after the 2013 federal election, which brought a grand coalition into power that committed to a quasi-tolerance of dual citizenship for second-generation immigrants (Zacharakis, 2014), Germany came a long way from the old exclusionary nationality law, which was based on ethnicity only.

The MIPEX reflects the policy context of immigration and integration in Germany described so far. To recall, this data set of several OECD countries gives them scores from 0 (no immigration friendly policies) to 100 percent (ideal best practices) for certain specific policy categories of migration and integration policies in general. In 2007, Germany scored exactly at the European average with 53 out of 100 percent for its integration policies, ranking 14th together with Ireland. Political participation and family reunion policies stood out with 66 and 61 respectively. Immigrants in Germany have many political liberties, like the right to join a party or lobby organisation, but were not allowed to vote or get elected. Altogether in this respect Germany was quite similar to Canada. However, unlike in Canada, consultative bodies of immigrants in Germany were often funded and also consulted by local, regional, and *Land* actors, which also engaged in campaigns to inform immigrants about their rights. Scores for family unification, especially the security of status and the rights for family members, once unification is granted, which is a longer and more difficult process than in Canada, are high in Germany. Access to naturalization was still restrictive (38 percent), as dual nationality was only possible in exceptional cases and the requirements for naturalization were still hard to meet. In the category called labour market access, Germany shows a more restrictive side compared to Canada as well. Germany only scores 50 percent in this

category. While all immigrant workers can join unions in Germany, it is difficult for some workers to change their employer and eligibility for work permits is restricted as well (Niessen et al., 2007, p. 74-79).

In 2011, Germany raised above the EU average of 52, scoring 57 percent altogether. Labour market mobility, political participation, and anti-discrimination policies, however, did not change significantly. Major improvement came from the liberalization of naturalization policies (59 percent), increasing the security of status for applicants and clearer acquisition conditions, including a toleration of dual nationality for EU citizens. A decrease came from family reunion policies, now at 60 percent as acquisition conditions were hardened by language tests for spouses, even from abroad. Unlike Canada, Germany's education system is hardly prepared to manage integration well, scoring only 43 percent. Whereas Germany does better than the EU standards in this category, as for example intercultural education is a regular part of school curriculum, it does not meet the higher standards, for example for language courses, of other major immigrant receiving societies, like Canada. The basic structure of the highly segregating school system in Germany aggravates the problems of some immigrants from working class backgrounds (Huddleston et al., 2011, p. 86-91).

As the economic situation can influence immigration policy contexts, I will lastly look at Germany's economic record for the period of 2008 to 2013. In 2009, a short but considerable recession hit the country, as the GDP contracted by 5.1 percent in a year from US\$ 3.6 billion to US\$ 3.3 billion. In the following two years the GDP recovered between three and four percent annually. In 2012 and 2013, the GDP growth slowed down to less than one percent per year, totalling at US\$ 3.6 billion, almost as high as

before the recession of 2008 (Countryeconomy.com, 2014). The unemployment rate lowered significantly from roughly 8.5 percent in 2008 to five percent in 2013. Even in the recession year of 2009, unemployment only grew briefly (Tradingeconomics.com, 2014).

Before exploring the immigration and integration discourses in Canada and Germany in chapter four, I will briefly compare Canada's and Germany's policy contexts. There were some similarities, but the differences seem to remain stronger. Both countries are destinations for many immigrants from all around the world, but whereas Canada has experienced a positive net immigration over the whole research period, Germany's net migration was volatile, with some years of larger numbers of emigration than immigration and some years even surpassing Canada's immigration numbers. As Canada has a smaller overall population than Germany, the relative percentage of immigrants received each year was higher in Canada than in Germany for the whole research period. According to the OECD, this leads to the outcome that Canada has the second highest percentage of foreign-born population (20 percent), whereas Germany has a share of foreign-born humans of 13 percent in 2011. The naturalization rate of immigrants in Germany is very small, whereas more than eight out of ten immigrants in Canada naturalize.

Although Germany liberalized its immigration laws, Canada's immigration laws are still more open and accessible for a larger number of humans. It is more difficult to judge integration, but it seems that Canada's integration record is better than Germany's, probably stemming from Canada's focus of recruiting mostly highly skilled immigrants. The MIPEX gives Canada considerably more points, for example 82 compared to 52

points in 2012, and many more immigrants naturalize in Canada than in Germany. Although the economic situation was similar in both countries during the economic shocks of 2008 and 2009, Germany recovered more quickly than Canada, which led to a higher annual GDP growth and a lower unemployment rate in Germany than in Canada soon after the peak of the crisis. However, immigrants' unemployment rates are similarly high in both countries and it is difficult for immigrants to have their degrees earned abroad recognized in both Canada and Germany, leading to the outcome that immigrants in both countries have to work in jobs that are under their level of qualification. Still, it appears that the differences between the policy contexts remain stronger than the similarities.

After this comparison, it should be clear that there are some similarities and differences between Canada's and Germany's policy contexts of immigration and integration. The immigration and integration discourses take place with these similarities and differences in the background. What similarities and differences in the discourses in Canada and Germany can be found? Is there even a convergence of discourses, or do the different national traditions prevail? With regard to convergence of discourses, I expect, as outlined in the introduction, a convergence of immigration and integration discourses in Canada and Germany as described by some scholars for other immigration and integration provisions. Joppke (2007) describes a convergence of integration policies in several Western European countries that appears to stem from a so-called emulation process, in which political actors in one country take inspiration of another country's policy approach to a certain issue (Bennet, 1991, p. 220-223). For instance policy makers in some states, like Germany, took inspirations and ideas from other states, like the

Netherlands in order to craft new integration policies. Other scholars point to a convergence of immigration policies in Canada and Germany that are said to be influenced by transnational values like refugee protection and human rights as embodied in the UN Convention on the Status of Refugees or human right treaties, like the UN Charter of Human Rights (Triadafilopoulos, 2012, p, 52, 103, 115). Simon Green points to a EU-led harmonization (Bennet 1991, p. 225-227) and strong role of transnational factors for a convergence of both immigration and integration policies (Green, 2007).

It appears that these factors have an impact on immigration and integration policymaking and can lead to a convergence. As discourses are related to policy making, as described by Hansen (2006) or Jenson (1989) and as already described in chapter two, it seems possible that these policies have an impact on integration and immigration discourses as well. Harmonization is unlikely to cause convergence in the case of a comparison of Canada and Germany, as there is no governing body that could further harmonization as the EU in Europe can (Bennet, 1991, p. 220-225). Hence, I will focus on the role emulation, transnational values, and international treaties have for the convergence of immigration and integration discourses in Canada and Germany. I expect to find these ideas and references to treaties, like the UN Convention on the Status of Refugees or the UN Charter of Human Rights, in the speeches of politicians in the 22 parliamentary debates I will analyse. Emulation should be found by politicians talking about Canada or Germany respectively as a role model and hence they should argue in a similar way and propose similar policies.

I also hold the opposite expectation that the differences between Canada and Germany are still more pronounced, as suggested by the literature about the influence of

national traditions on discourse (e.g. Banting & Kymlicka 2010). Some scholars stress how different national traditions of state-church relations shape integration debates in Europe. An almost complete legal integration of Islam in Austria, which has been in place since 1912 and still largely is today, led to the outcome that the debates in Austrian newspapers about issues of integration tend to revolve more around pragmatic problems, like integrating Muslim customs, and less around issues of morality or identity. Quite contrary is the situation in Switzerland, where more debates in newspapers are concerned with issues of morality and identity, which corresponds with an almost complete legal neglect of Islam (Dolezal et al., 2010, p. 173-186).

Which national traditions do I expect to be influential on discourses of immigration and integration? In Canada, I expect persistent policies and understandings of multiculturalism, of being country of immigration, and of unquestioned concepts of *ius soli* citizenship, something Will Kymlicka referred to as a “three-legged stool” (Kymlicka, 2003, p. 202-204). Germany’s national tradition of immigration and integration is said to have developed around persistent conceptions of the German language, persistent concepts of German ethnicity, as well as persisting policy concepts of *ius sanguinis* citizenship (Brubaker, 1992; Joppke, 2001).

I expect to find these influential national traditions in the 22 parliamentary debates, where these national traditions of multiculturalism or other traditions of nationhood are used to sustain claims as well as defend or attack policy proposals with authority. I will see which of these expectations can be sustained by the discourse analysis to be conducted in the next chapter.

Chapter Four: Discourse analysis

In my discourse analysis, I will draw on the concepts and models outlined in the introduction. I will start with a wider reading of many texts in the immigration and integration discourse in Germany and Canada, even from national newspapers like ‘The Globe and Mail’ in Canada or the German weekly newspaper *Die Zeit*, in order to get a basic understanding of dominant and minor voices in the discourses. Secondly, I will continue with closer, repeated readings of ten parliamentary debates from Canada and twelve from Germany, mostly debates that ensue after official policy proposals are presented in parliament. I set the time frame for these texts from 2008, when the economic crisis hit until 2013, when a new government was elected in Germany. The debates of the German parliament are accessed via the German parliament’s webpage, www.bundestag.de, while the Canadian debates are not downloaded from www.hansard.ca, but taken from the webpage www.openparliament.ca, as this webpage is more accessible. Both groups of text are seen by Hansen as important for discourse in various ways: they clearly articulate the identities they seek to convey, they mostly get wide attention from media and other political actors, and they boast formal authority, as the speakers have the legitimacy to actually change the policies they argue about (Hansen, 2006).

I will analyze these texts according to the categories predications, presuppositions, subject positioning, and key representations. Key representations will allow me to identify the four most important sub-discourses in Canada and Germany and the three former categories will help me to describe those four sub-discourses closer. These steps will help me elucidate the similarities and differences of the discourses in

Canada and Germany. Although they surely have impact in political debates, I will leave the contribution of radically alternative sub-discourses, like right-wing populist or immigrant advocate group discourses out, as especially the latter do not possess significant legal power to shape the policy formation in Canada and Germany.

In order to clarify the use of these categories of my analysis, I will give an example. The Member of Parliament (MP) Olivia Chow (New Democratic Party, NDP) gave a speech in the Canadian House of Commons on April 27th 2010 on the Bill C-11, which the Canadian government named ‘Balanced Refugee Reform Act’. It was brought to parliament after two ships with mostly Tamil alleged refugees arrived on Vancouver Island in 2009 and 2010:

As we go into this debate, on this refugee reform bill, Bill C-11, perhaps what we should do is remember that history [of the Komagata Maru] and that reputation for generosity and for sharing what we have, versus a government that was obsessed with narrow self-interest. At that time there was also an obsession with elections. We could see these people coming to our shores, either as people seeking new opportunities or as queue-jumpers or people who want to scam our system. (openparliament, 2014a)

The terms ‘history’, ‘generosity’, ‘opportunity’ and ‘proud’ are here analyzed as key representations in this text. They give the text a general meaning, which allows to distinguish between or compare with other texts in order to establish sub-discourses, in this case I will call this sub-discourse ‘humanitarian nation building sub-discourse’.¹⁶ A

¹⁶ The labels I assign to the sub-discourses in this chapter should become clear after reading the related sections. The labels consist of two facets that I find to be most conclusive of the characteristics of each sub-discourse while still allowing me to compare them with each other. For example, the ‘exclusionary integration sub-discourse’ in Germany is comparable to the ‘exclusionary economic utility sub-discourse’ in Canada because of their tendency to exclude unwanted immigrants. The former stresses the importance of the integration of immigrants the

presupposition can be found in the notion that Canada experienced both times that Canadians can be proud of and other times of which Canadians cannot be proud of. This entails the implicit assumption that Canadians, and especially the government, should learn from the bad deeds committed by Canada in its history. In this context, the reference of national self-interest is a presupposition that narrow national self-interest is the cause for these tragic past events, whereas generosity and sharing led to events, which Canadians today can be proud of.

Predications can be found as well. The government is ‘obsessed with self-interest’ and Canada has a ‘reputation for generosity’ as well as for ‘sharing what we have’. These people (i.e. the alleged refugees) are characterized as to be either ‘queue jumpers’ or ‘opportunity’ seekers. Not surprising for a parliamentary debate, the central categories of subject positioning, the described actors or subjects, are, on the one hand, the opposition, ‘good’ Canadian Self, as well as the ‘We’, understood here in a positive, sharing, and generous way. The government Other is portrayed as negative and focused on ‘narrow national self-interest’. To recall, not all othering leads to a radically different Other, it rather happens through various degrees of otherness. The government in this case is not a radical Other that has to be annihilated or deterred, but rather should be non-violently combated in parliament and politics in a well-mannered, non-violent way. In addition, there is also a temporal Other ‘the dark page of Canadian history’, which compared to a better status quo today, one that is challenged by the Government Other.

most, whereas the latter stresses and demands economic contributions of immigrants the most. Because of the importance of these facets, the sub-discourses are labelled in this way. The same rational is used for labelling the ‘humanitarian nation building’ and ‘humanitarian anti-discrimination sub-discourse’.

The discourses in Canada

Two topics were central in the Canadian immigration and integration discourse during my research period. One were the debates about the allegedly broken immigration system, an issue that the conservative government repeatedly brought up in order to reform the immigration system in the way they deemed necessary. The other central topic that stirred debate focused on the arrival of the aforementioned boats of Tamil refugees, in the following referred to as ‘Sun Sea problem’, illegal migration, and less on concerns with immigrants and refugees in general. Frequently, the oppositional parties argued against these changes and tried, sometimes successfully, to stop them. In this section, I will firstly describe and sum up the two discourses involved in these debates and how they evolve over time. Secondly, I will point out similarities and differences in Canada’s immigration and integration sub-discourses.

In the debates that surrounded the repeated attempts by the government to reform the immigration system, the differences in the debates are less obvious in the beginning and grow more obvious in the end, coinciding with the growth of the Conservative Party’s power over the years. In the debates about the ‘Sun Sea problem’ the party divide was always clear. Key representations in this sub-discourse are terms like ‘broken system’, ‘integrity’, ‘crooked’, ‘fraud’, ‘illegal’, ‘criminal’, ‘fair’, and ‘queue jumping’. All these terms were central to the ‘exclusionary economic utility sub-discourse’, as almost all of these terms appeared in every text that could be related to this sub-discourse, which I called the ‘exclusionary economic utility sub-discourse’.

Several presuppositions appeared often in the ‘exclusionary economic utility sub-discourse’. Politicians who employed, consciously or not, this sub-discourse were fully

convinced that Canada has the best immigration system in the world, and that Canada is the best country a refugee could flee to. At the same time, Canada is seen as highly depended on immigration both economically and as a centrepiece for Canada's view of being a country of immigration. As a consequence, politicians who adhere to this the 'exclusionary economic utility sub-discourse' presume that Canada as a nation is threatened if Canada's immigration system has significant problems. These politicians were also convinced that they knew exactly what Canadians or Canadian taxpayers want. In this case they knew that Canadians wanted tougher laws to punish and exclude criminals, to fix the immigration and refugee systems. Politicians utilizing this sub-discourse were also afraid of lingering support of Canadians for, possibly even outright xenophobia against, the heavily needed immigration if the assumed illegal and fraudulent immigration continues.

Often when politicians resorted to the 'exclusionary economic utility sub-discourse', they were convinced that the Canadian government could 'fix' the immigration system by excluding unwanted, i.e. not economically useful, immigrants and illegally arriving refugees, not by increasing the resources for the immigration and border services agencies. They were also sure, at least superficially, that the Canadian government can crackdown on 'crooked immigration consultants' overseas. In order to 'fix' the immigration system, politicians utilizing the 'exclusionary economic utility sub-discourse' supposed that illegal immigrants and bogus refugees can be deterred from coming to Canada by cutting incentives, like overly generous health care. Politicians using this sub-discourse premised that criminals can be deterred by severe sentences and that it is quite easy and straightforward to determine who is a bogus and who is a bona-

fide refuge. As an example, Rob Clarke, MP of the Conservative party argued in the debate about Bill C-49 on October 28th 2010:

Are these measures tough? Yes, undoubtedly. However, in order to make human smugglers and fraudsters think twice, they have to be. They are also fair to those who legitimately and legally wait or have waited in line for a better life in Canada and they are fair for all Canadians who rightly expect that our borders and shores are protected and secure and our generous system protected from abuse. (openparliament, 2014b)

Predications in this sub-discourse were often related to Canada and the central categories, like refugees, in this debate. Canada was described as having a great, open, humanitarian and generous immigration tradition in general, and especially with regard to the protection of refugees. Canada is further depicted as a country, which future is dependent on immigration that addresses Canada's labour market needs, and it is also in fierce competition with other major immigration countries like Australia and the UK. As a consequence, Canada's immigration program is depicted as to have not enough space for too many immigrants, especially those from family unification and those which bring little economic benefit to the country. Minister of Citizenship Jason Kenny states in the debate on Bill C-566 on March 9th 2011:

We have the largest immigration program in the world, yet there are all sorts of competing demands for the scarce amount of spaces there. [...] How do we select who those 265,000 people are going to be? After all we have a managed immigration program. We want to choose the right mix of people who will fuel our economic growth, pay taxes and help to manage unfunded future liabilities for health care, social programs and public pensions. (openparliament, 2014c)

Politicians utilizing this sub-discourse picture Canadians as to be generous and as to possess a strong sense of fairness. These politicians describe it as justified when Canadians are worried that criminals are abusing their ‘great’ immigration and refugee protection system, which is a clear violation the “fair play” Canadians are said to believe in, as claimed by Minister Jason Kenney in 2012 (openparliament 2014d). Hence, Canadians get assigned the legitimacy to demand change from politicians by politicians using the ‘exclusionary economic utility sub-discourse’. Immigrants take the role of suffering from a high unemployment after landing compared to Canadians. Refugees are pictured as victims of illegal trafficking rings or crooked consultants. Bogus refugees are said to cause an enormous backlog in the refugee system, and hence lower the protection of bona fide refugees. The immigration system is delineated as broken, which leads to enormous backlogs and can further lead to security problems for Canada, as terrorists and criminals could enter the country more or less unrestricted.

There are three major subject positionings in the ‘exclusionary economic utility sub-discourse’, a government/opposition distinction (again hardly surprising in parliamentary debates), a today/history distinction, and a good immigrant/bad immigrant distinction. Politicians who exert this sub-discourse describe the government positively and as an institution that ‘does what has to be done’, like fighting criminals who exploit immigrants, although it is very difficult to do. Politicians using this sub-discourse claim that this struggle protects the law, refugees and the immigration system. Minister Jason Kenney on September 19th 2011:

What this bill [C-4] seeks to do is maintain Canada’s commitment to our domestic and international legal obligations with respect to refugee protection and to respect our humanitarian obligation to protect bona

fide refugees fleeing persecution while at the same time changing the business model of the criminal smuggling syndicates. (openparliament 2014i)

This noble endeavour is said to be countered by the oppositional parties, which are portrayed almost exclusively in a negative way. The NDP is depicted as a user of shameful political tactics, like scaremongering and the Liberals are blamed for the massive backlog in a broken immigration system they left behind. Both opposition parties are described as backwards, accused of defending the status quo and shying away from the necessary changes, which have to occur in order to make Canada more competitive in attracting the best and brightest immigrants.

An important, crucial distinction for the ‘exclusionary economic utility sub-discourse’ is drawn between good immigrants and bad immigrants. There are good immigrants, who contribute to the economic prosperity and future of Canada. Bad immigrants are seen as a social burden for Canada because of their likely unemployment or high repatriation costs, which is too much to bear for the Canadian taxpayer. Related to that is the distinction that is drawn between bona-fide refugees and bogus refugees, the former deserving Canada’s protection and a new life in Canada, while the latter clog Canada’s refugee protection system, abuse Canada’s generosity and hence have to be quickly removed. Lastly, the aforementioned temporal Other are ‘bad’ events in Canada’s history, which often manifest themselves in the retelling of the story of the Jewish refugee ship SS St. Louis from 1939 that was turned away by anti-Semitic Canadian authorities. On April 26th 2010, Minister Jason Kenney remarked:

[T]here have been moments of when we turned our backs on those most urgently in need of our help. We think, of course, of the example of the European Jewish refugees during the Second World War who

Canada refused to accept, detailed in the great historical work *None is Too Many* by Harold Troper and Irving Arbella. (openparliament 2014a)

The ship had to return to Germany, and hence most passengers on this ship died later in concentration and death camps. This is contrasted with a ‘good’ open, generous and welcoming Canadian Self of today. Table 1 sums up a selection of the important properties of the Canadian sub-discourses.

Sub-discourse	Key re-presentations	Presuppositions	Predications	Subject positioning
Exclusionary economic utility	Integrity fraud illegal queue jumping	Canada: dependent on immigration Criminals can be deterred by higher sentences	Canada: in competition for immigrants Bona fide refugees: victims of criminals	Immigrants that contribute to the economy vs. immigrants that drain the country
Humanitarian nation building	Humanitarian protection generous fair	Canada: country of immigration with great reputation for openness Immigrants: New Canadians	Canada: generous, multicultural and benefits from immigration Immigrants: hard working, great contributions	Good immigrants vs. criminal immigration consultants

Table 1: Sub-discourses in Canada

The ‘humanitarian nation building sub-discourse’ in the debates about the ‘Sun Sea problem’ and the immigration law reforms has different foci than the ‘exclusionary economic utility sub-discourse’ at its heart, like an emphasis on human rights as well as on protection of refugees and immigrants. Key representations in this discourse in this sub-discourse are ‘humanitarian’, ‘generous’, ‘compassionate’, ‘fair’, ‘protection’, and ‘vulnerable’. To recall, key representations are central to the ‘humanitarian nation building sub-discourse’, as almost all of these terms appeared prominently in every text

that could be related to this sub-discourse.

There are several presuppositions in the ‘humanitarian nation building sub-discourse’: a very important one is the notion that Canada is a country of immigration¹⁷. Immigration is further constructed as an integral part of Canada’s future, for demographic, economic as well as ideational reasons. Politicians utilizing this sub-discourse state that Canada’s immigration policies reflect on Canada’s identity as a humanitarian and generous nation, and that policies and identity have to go together. On September 28th 2010, Justin Trudeau argues against Bill C-49:

That is not typical of Canada. That is not typical of Canadians. We are a country that has consistently stood open to immigration, to refugees, and to drawing from around the world people, who wish to come here, build a safe and secure life free from persecution.

Now we are busy encouraging that persecution and hyping up the tensions between Canadians and potentially new Canadians.
(openparliament 2014b)

Related to the idea of Canada’s generosity is the idea that Canada’s character shows itself in the treatment of the weakest in society, i.e. immigrants and refugees. Another presupposition often applied by politicians of the ‘humanitarian nation building sub-discourse’ is the automatic labeling of all immigrants as ‘New Canadians’. Again, as in the ‘exclusionary economic utility sub-discourse’, politicians assume to know what the average Canadian and the Canadian taxpayer want, only in this case that is more humanitarianism and protection of the weakest. Canada’s reputation as a great, open, and welcoming nation is implied to be under threat by the reforms of the government.

¹⁷ First Nations and other groups like Métis and Inuit, were almost never presented as integral parts of Canada in the debates about immigration and integration. Canada’s history as a colonizing power is omitted very often as well.

However, the politicians who resort to the ‘humanitarian nation building sub-discourse’ postulated a strong ability to protect Canada’s ‘proud’ traditions of being an open and generous nation.

Politicians employing the ‘humanitarian nation building sub-discourse’ are convinced that a division and emphasis on difference in the debates about immigration is disadvantageous for Canada, and instead postulate that ‘we’ have to stand together for an unspecified ‘good’ future. They further presume that good immigration policy leads to a strong country and a successful economy, whereas bad immigration policy leads to a divided country, suffering of the weakest members of society, like refugees, and raising resentments towards immigrants in Canada’s general population. These politicians further assume that the refugee system works and that it does not need to be reformed, just better funded. In a similarly functionalistic fashion, these politicians suppose that integration happens quasi-automatically via the granting of permanent residency, good and hard work, and naturalization.

Several predications often appeared in texts of the ‘humanitarian nation building sub-discourse’. Canada is almost always characterized as great, compassionate, wealthy, open, welcoming, or stable. It is described by politicians utilizing this sub-discourse as to be built on principles of human rights, Trudeau’s Charter of Rights, and, of course, immigration. It is further assigned to have a ‘proud’ tradition of refugee protection as well as a humanitarian one. Canada’s national identity is often depicted by politicians utilizing the ‘humanitarian nation building sub-discourse’ as to be based on common values, like compassion, hard work, the rule of law, and democracy, not on a single race or religion. Politicians using this sub-discourse describe Canada as strong precisely

because of its diversity and multiculturalism. These politicians also depict Canadians as proud of this. Lastly, Canada is pictured by them as to be obliged to fulfil the obligation for human rights and refugee protection that stem from the Charter of Rights and several international conventions, like the United Nations refugee protection convention.

Politicians characterize both Canada and immigrants as beneficiaries of immigration. Immigrants (i.e. New Canadians) are often described as highly skilled and individuals, not just economic units. A high importance by politicians using the ‘humanitarian nation building sub-discourse’ is given to immigration via family unification, as this is said to assist immigrants in establishing roots in Canada, which is seen as central for their integration. Hence, family unification is described as central for Canada’s immigration system. All immigrants, not just the economic class ones, are said to contribute strongly to Canada. Permanent immigrants are depicted as engaging in hard, difficult jobs and create businesses. Temporary foreign workers are usually used as an anathema to the ‘good’ immigrants. They are pictured as bad for Canada by politicians that use the ‘humanitarian nation building sub-discourse’, because these workers cannot properly integrate into the country and build Canada due to their temporary nature and their inability to bring their family. In this context, MP Olivia Chow claims in the debate about Bill C-50 on April 17th 2008: “Immigration policy that does not integrate immigrants into Canadian society, into our cities, our schools and our economy, undoubtedly leads to divisions in our society” (openparliament 2014e). Temporary foreign workers are also pitied as they are depicted as to be only brought to Canada for economic exploitation. In the same debate on Bill C-50, MP Olivia Chow argues:

[The] solution [of the Government is to] bring in temporary foreign cheap labour for their friends, especially in the oil sands. [...] What

Canada are we building if we are encouraging the growth of a program that brings [in] temporary workers with no rights, no families, and no future here in Canada? (openparliament 2014e)

Refugees are presented as vulnerable victims that flee from oppression and/or persecution, with no time for planning and considering where to go. Because of the conditions that go together with fleeing, like threats to ones life, refugees cannot be deterred by tougher refugee provision, as this would require time to rationally deliberate where to run away to. Because of refugees' vulnerability, politicians who make use of the 'humanitarian nation building sub-discourse' often characterize refugees as the most vulnerable parts in Canadian society after arriving and hence they have to be protected the most. Integration into Canada is presented as difficult for refugees. Because of the cultural shock and language problems, refugees are in need of Canada's help to start a new, 'good' life in Canada. Detention after landing in Canada is depicted as severely damaging for refugees, making their proper integration more difficult. Detention is further pictured as unnecessary, as the determination of the status of refugees is conceived as largely strait-forward and unproblematic. Lastly, according to the politicians of the 'humanitarian nation building sub-discourse', refugees and immigrants should not be confused with criminals and terrorists, as the former are depicted as dangerous people that have to be tried in Canada, not just deported, while the latter pose no danger and have to be protected. Justin Trudeau MP of the Liberal Party states in the debate about Bill C-49 on October 28th 2010:

This legislation actually does very little to go after the evildoers, and far from protecting the vulnerable, actually goes after and punishes asylum seekers. [...] [W]ell before the second boatload arrived, the public safety minister was already warning the Canadian public that

the boat was filled with terrorists and criminals [...]. (openparliament, 2014b)

This opposition between real refugees and good immigrants on the one hand, and criminals and terrorists on the other, is one of the important subject positionings in this sub-discourse. Especially the criminal immigration consultants are depicted as a quite radical 'Other' who has to be fought with all legally possible means, to protect real refugees and good immigrants from exploitation and victimization. The other important subject positioning is again the opposition/government one. While the oppositional parties, who almost exclusively utilized this sub-discourse, portrayed themselves as positive, the government 'Other' is described almost exclusively in a negative light. The parties of the opposition are pictured positively because they are the ones that protect Canada's great open and generous immigration and refugee traditions and they are the ones that uphold the principles of the Charter of Rights. They would further be the right ones who allow for increased and 'better' immigration, especially for refugees and family unification. Other politicians of the opposition shed light on the great accomplishments they achieved in the past.

The Harper government is constructed by politicians who utilize the 'humanitarian nation building sub-discourse' as an actor that plans to destroy Canada's great humanitarian tradition, its refugee protection, and the immigration system in general, without respect for Canada's values. Hence, the Harper government is said to threaten Canada's reputation in the world as the best, most open and welcoming nation. More graphically, politicians utilizing the 'humanitarian nation building sub-discourse' picture the Conservative party as planning to 'shut the door' and to 'roll the clock back to Reform Party isolationism'. The government is seen as undemocratic, because of its

many omnibus bills and certain planned or already attempted power abuses. It is lastly accused of playing with Canadians' fears, of fuelling anti-immigrant sentiments in the Canadian population, and of being 'cruel' to refugees.¹⁸

Despite considerably different subject positionings, there are some similarities between the 'exclusionary economic utility' and 'humanitarian nation building sub-discourse'. Both sub-discourses construct Canada as a great nation, a nation that one can be legitimately proud of, with a great history, of generosity, humanitarianism, and openness for immigrants and refugees, though in varying degrees. This aspect is stressed much more by the 'humanitarian nation building sub-discourse' than by the 'exclusionary economic utility sub-discourse'. Both see Canada in a strong competition with Australia, the US, and the UK for the best and the brightest immigrants, amplified by the always presupposed 'globalization' and its necessities. In both sub-discourses, integration is assumed to happen quasi-automatically for those who work and live in Canada for a longer period of time. In both sub-discourses a strong sense for protecting immigrants from crooked consultants and other exploitation is present. Lastly, politicians utilizing both sub-discourses are convinced that Canada's future depends strongly on the 'good' kind of immigration, with only the 'good' varying considerably.

This 'good' immigration is one of the major differences between both sub-discourses. Whereas it is much more common in the 'exclusionary economic utility sub-discourse' to construct 'good' immigrants as those who contribute to Canada's economic growth by filling labour shortages, including temporary foreign workers, in the

¹⁸ In the centre-left sub-discourse, history is used differently than in the centre-right sub-discourse. Politicians here employ historic events, like the turned-away immigrant ships SS St. Louis and Komagata Maru, or the Chinese head tax, mainly to draw comparison to today's plans of the government 'Other'. By this, they want to point out that racial discrimination and other exclusionary policies of the past are, according to their view, in danger of being repeated today.

‘humanitarian nation building sub-discourse’ ‘good’ immigrants contribute to the building of Canada as a nation, especially permanent economic immigrants, family class immigrants, and refugees. Whereas politicians employing the ‘exclusionary economic utility sub-discourse’ are convinced that the immigration and refugee systems of Canada are ‘broken’ and need urgent ‘fixing’, by excluding unwanted immigrants and bogus refugees, the other sub-discourse is far less certain about the state of the system. While not convinced that everything is fine as well, politicians of the ‘humanitarian nation building sub-discourse’ favour more resources for the system and are opposed to ‘arbitrary’ exclusion.

Politicians resorting to the ‘exclusionary economic utility sub-discourse’ fear the possibility of wavering consent of Canadians to immigration and refugee protection, if the system is not reformed towards more exclusionary policies. Especially Canadians’ and Canada’s generosity in general are often claimed to be under threat by, and hence has to be protected from, illegal immigration and criminals. For the ‘humanitarian nation building sub-discourse’ generosity is a core Canadian value. Immigration policies have to comply with this core value in order to be considered legitimate by the Canadian public. This makes the introduction of exclusionary policies more difficult. Securitization of immigration is strong in the ‘exclusionary economic utility sub-discourse’, whereas the other discourse avoids and stands in opposition to attempts to link questions of immigration to questions of security, like terrorism. Unlike politicians of the ‘exclusionary economic utility sub-discourse’, the ‘humanitarian nation building sub-discourse’ holds the central presupposition that there are no save countries of origins for refugees and that refugees are not ‘jumping’ any ‘queue’.

There are more differences than similarities between the ‘exclusionary economic utility sub-discourse’ and the ‘humanitarian nation building sub-discourse’. The ‘exclusionary economic utility sub-discourse’ asks for many qualifications for immigrants and refugees, which they have to meet in order to immigrate. The foremost role of immigrants is to strengthen Canada economically, other possible contributions of immigrants are only acknowledged superficially and often neglected. This kind of sub-discourse is often described as a neoliberal one (Bauder, 2008a; Leach, 2013). I suggest that the ‘humanitarian nation building sub-discourse’ is more generous and humanitarian towards immigrants and refugees than its counterpart. Less qualifications are demanded from immigrants before they are considered as ‘good’ immigrants by this sub-discourse. For example, refugees are seen as refugees that need Canada’s protection and are not met with scepticism about their trustworthiness or as potential bogus refugees who have to be detained. This lack of demand for immigrants’ qualifications can also be found in this sub-discourse’s emphasis on the non-economic contributions that immigrants, who came to Canada via family unification, bring to Canada, rather than focussing only on the economic contribution of immigrants, although economic arguments are sometimes brought up as well. On March 9th 2011, MP Don Davies (NDP) notes:

[Bill C-566] would provide no burden on the taxpayers of Canada [...]. The main benefit, of course, is family reunification. This is a policy and a bill that treats immigrants as people, not as economic units. Family class immigrants are regarded as the most successful class of immigrants. This is not surprising as they are people who are coming in to establish family units with social, economic and cultural supports. (openparliament 2014c)

Interesting is that the ‘exclusionary economic utility sub-discourse’ becomes more exclusionary over the research period, coinciding with growing power of the conservative party, while the ‘humanitarian nation building sub-discourse’ stays largely inclusive towards immigrants. Minister of Immigration and Citizenship Jason Kenney gave balanced, careful speeches that switched between both sub-discourses in times of the Conservative minority government. In 2012 however, in which the Conservative party won a majority government, the discursive shift was considerable. For example, the right of permanent residents to family unification is no longer seen as a right by Mr. Kenney, but as privilege that can be revoked (openparliament, 2014d).

The discourses in Germany

The debates about integration and *Zuwanderung* in Germany were much more pronounced during the time period of this study than they were in Canada. These debates revolved around *Zuwanderung* liberalization bills and citizenship reform proposals in favour of dual citizenship. This section will demonstrate that the problem of integrating immigrants was much more important in the German *Zuwanderung* and integration discourse than it was the case in Canada. Hence, the term ‘integration’ was more often used and of high importance for the sub-discourses in Germany. Immigrants as the central objects of *Zuwanderung* were generally referred to as teenagers, women, seniors or citizens with ‘migration background’ (*Migrationshintergrund*). In the following, I will describe the two central sub-discourses in Germany’s *Zuwanderung* and integration debate and point out similarities and differences thereafter.

The ‘exclusionary integration sub-discourse’, which politicians often utilized to oppose citizenship reforms, showed several key representations: ‘Parallel societies’ (*Parallelgesellschaften*), ‘country of integration’ (*Integrationsland*), ‘multiculturalist romanticism’ (*Multikultiromantik*), ‘Facilitating and demanding’ (*Fördern und Fordern*), ‘forced marriage’ (*Zwangsheirat*), ‘integration deficits’ (*Integrationsdefizite*), and ‘culture of welcoming’ (*Willkommenskultur*). To recall, key representations help to distinguish between several sub-discourses, as almost all of these terms appeared in every text that could be related to the ‘exclusionary integration sub-discourse’.

Many presuppositions of the ‘exclusionary integration sub-discourse’ could be found. Often politicians utilizing this sub-discourse assumed that Germany does well compared to other European countries with regard to integration. The prime vehicle of this allegedly successful integration, the state-led integration courses that teach immigrants German values and lessons to survive the day-to-day life in a new country, are assumed to be able to integrate immigrants into German society, and are further assumed to have the potential of empowering immigrant women. Politicians exerting the ‘exclusionary integration sub-discourse’ presume that learning the German language is the cornerstone for successful integration. The special language courses for spouses from some non-European countries that had to be fulfilled before family unification can take place are expected to further integration and even to stop forced marriages. All this underlies the presupposition that the state can protect immigrant women from harm that could or will happen to them in their immigrant communities. As integration is presumed to need the contact of immigrants with the host society and Germany is believed to be open for the contact with immigrants already, the faults for the alleged integration deficits

are assumed to be on the immigrants' side. It is further assumed that immigrants cannot just move to a new territory and then live on as they did before migration, but that they have to integrate themselves into the already existing culture of the host society.

Politicians using the 'exclusionary integration sub-discourse' see immigrants who stick to their old culture as dangerous for Germany, as especially Islam with its Sharia regulations does not yet accept some central values of Germany, like freedom of expression or equality of men and women. To overcome these existing integration deficits of immigrants, a dialogue between Islam and Germany is presumed to be in high need for the successful integration of Muslim immigrants. With regard to integration of different cultures, these politicians further assume that *Multikulti*, a derogatory German term for multiculturalism or multicultural provisions, has failed.¹⁹ *Multikulti* is seen as bad for integration as it is expected to lead to segregation and parallel societies. Too much *Zuwanderung* is presumed to lead to more xenophobia in Germany, which is why politicians exerting the 'exclusionary integration sub-discourse' assume that *Zuwanderung*, and especially 'illegal migration', has to be kept in check in order to maintain the open or neutral attitude Germans have towards 'good' *Zuwanderung*.

This 'good' *Zuwanderung* is central for predications in the 'exclusionary integration sub-discourse' as well. For politicians of the 'exclusionary integration sub-discourse' 'good' *Zuwanderung* brings Germany the qualified immigrants it needs, like engineers, highly skilled tradespeople or carers for the elderly. In order to achieve this goal, 'good' *Zuwanderung* has to be managed and should mostly focus on economic aims. On May 16th 2013, MP Hartfried Wolff (FDP) argues: "The oppositional parties

¹⁹ The statement that *Multikulti* has failed is in itself another presupposition as Germany never practiced multiculturalism or introduced multicultural policies in a way Canada did.

use any given procedure of *Zuwanderungspolitik* in order to speak in favour of an unmanaged *Zuwanderung*. For this goal, they reckless accept growing burdens for the welfare state and growing xenophobia [author's translation]²⁰ (Deutscher Bundestag, 2013b, p. 30340). 'Illegal migration' and family unification to some extent are depicted as not beneficial for Germany. Politicians of this sub-discourse represent Germany as an already modern, welcoming, European state. Ole Schröder, of the Christian Democratic Union (CDU) and Parliamentary State Secretary of the Ministry of the Interior claims on June 5th 2013: "We are a cosmopolitan country. We have a culture of welcoming" [author's translation]²¹ (Deutscher Bundestag, 2013a, p. 30953). Germany is also described as a country of integration, for example by Minister of State, Maria Böhmer, CDU, who states in a debate about German integration politics initiated by the Green party on February 22nd 2008: "We are a country of integration" [author's translation]²² (Deutscher Bundestag, 2008a, p. 15439). Germany is described as to have a history, culture, and values, which are often not closer defined. In order to become 'good' immigrants, immigrants have to speak the German language, accept the German values and engage with German history. On February 22th 2008, MP Hartfried Wolff stresses that "commanding the German language, accepting our legal system without restrictions as well as the values that underpin it, and engaging with the German history and culture are requirements for being accepted as native here" [author's translation]²³ (Deutscher

²⁰ In German: "Die Oppositionsparteien verwenden jeden beliebigen Vorgang aus der Zuwanderungspolitik um einer ungesteuerten Zuwanderung das Wort zu reden. Wachsende Belastungen für die sozialen Sicherungssysteme und ansteigende Ausländerfeindlichkeit nehmen sie dafür billigend in Kauf."

²¹ In German: "Wir sind weltoffenes Land. Wir haben ein Willkommenskultur."

²² In German: "Wir sind ein Integrationsland."

²³ In German: "Das Beherrschen der deutschen Sprache, die uneingeschränkte Akzeptanz unserer Rechtsordnung und der zugrunde liegenden Wertvorstellungen sowie Auseinandersetzung mit der

Bundestag, 2008a, p. 15446). ‘Good’ immigrants are further displayed as to embrace German citizenship and the indivisible loyalty to Germany that comes with it. Politicians of this discourse portray dual citizenship as highly problematic, as it is claimed that dual citizenship leads to legal problems, loyalty conflicts for immigrants and privileges of immigrants towards Germans, which is both described as bad for Germany and immigrants themselves.

Politicians resorting to the ‘exclusionary integration sub-discourse’ further picture dual citizenship as not beneficial for proper integration. ‘Good’ integration rests furthermore on immigrants’ learning the German language, but not just that. Politicians of the ‘exclusionary integration sub-discourse’ characterize integration also as an internal process of the mind and the heart, in which the immigrant aligns him- or herself with the culture of the receiving country and accepts the values of the hosting German society. In this process, immigrants have to accept Germany as their home (*Heimat*). Immigrants are described as to have many integration deficits, like being potentially disloyal, especially when they carry dual citizenship, are unemployed, or live in parallel societies with stronger gender inequality than in non-migration background Germany. Immigrants are pictured as being reactive to an integration strategy of ‘facilitating and demanding’ (*Fordern und Fördern*), i.e. incentives of the state in order to further immigrants’ integration and sanctions for those immigrants who refuse to integrate. In this process, a prime responsibility for integration is put on immigrant parents, which have to further their children’s integration.

deutschen Geschichte und Kultur sind Voraussetzungen dafür, hierzulande als Inländer angesehen zu werden.”

The major subject positioning in the ‘exclusionary integration sub-discourse’ is, again hardly surprising, the division between the government parties and the opposition parties. Politicians utilizing the ‘exclusionary integration sub-discourse’ delineate the government parties, as protectors of German citizenship’s value and as instrumental for integration, as they are responsible, rational, firm in principles and successful and not driven by a *Multikulti* ideology. Quite unlike the opposition parties, the Other, which is depicted as wanting to squander German citizenship on the *Multikulti-Basar*, and, because of their *Multikulti* ideology, create parallel societies and allow uncontrolled *Zuwanderung*.

Another important subject positioning was a division between the Jewish-Christian-occidental, Western European world against an Islamic, backwards Other. Germany is characterized as part of the Jewish-Christian world and the European Union, with which it shares important values like gender equality, freedom of expression, and other unspecified values that create an imagined community (*Wertegemeinschaft*). Islam is depicted as backward, because of Sharia regulations as well as various cultural and religious practices, such as forced marriages. However, unlike right-wing radicals, this othering is not a radical one, as the politicians exerting the ‘exclusionary integration sub-discourse’ picture Muslims and Islam in Germany to gain access to “[...] the Christian-occidental tradition, its culture and the enlightenment”²⁴ (Deutscher Bundestag, 2010, p, 6803) by integration measures, like language and integration courses. Related to the Islam Other, Turkey, and especially the Prime Minister Recep Tayyip Erdoğan are depicted as an undemocratic, disruptive Other.

²⁴ In German: “[...] christlich-abendländische Tradition, ihre Kultur und die Aufklärung.” Excerpt from a speech given by Prime Minister of the *Land* Hessen Volker Bouffier, CDU

Sub-discourse	Key representations	Presuppositions	Predications	Subject positioning
Exclusionary integration	Country of integration, parallel societies, integration deficits	<i>Multikulti</i> has failed, immigrants: many integration deficits	<i>Zuwanderung</i> : highly skilled only Integration: via language, mind and heart	Government defends German citizenship vs. <i>Multikulti</i> opposition
Humanitarian anti-discrimination	<i>Einwanderungsland</i> , appreciation, equal opportunity, discrimination	Germany: discrimination hinders integration, ‘We’-feeling beyond ethnic identities	Integration: reciprocal process between immigrants and Germany <i>Zuwanderung</i> : humanitarian reasons stressed	Opposition avant-garde of integration vs. backwards Government

Table 2: Sub-discourses in Germany

This Other threatens Germany’s sovereignty and integration policies by maintaining a strong influence on Turkish-Germans and their identities in Germany, thereby hindering successful integration. MP Reinhard Grindel (CDU) states on June 5th 2013: “Naturalization must not be a tool of Turkish politics to gain influence on German politics. Rather, naturalization is the apex of successful integration. The head of government for these fellow citizens is Angela Merkel and not Mr Erdoğan” [author’s translation]²⁵ (Deutscher Bundestag, 2013a, p. 30600). Table 2 sums up some important topics of the sub-discourses in Germany.

Politicians often used the ‘humanitarian anti-discrimination sub-discourse’ to argue for dual citizenship provisions. Several key representations could be uncovered: ‘appreciation’ (*Wertschätzung*), ‘discrimination’, ‘country of integration’

²⁵ In German: “Die Einbürgerung darf kein Instrument türkischer Politik sein, Einfluss in Deutschland zu gewinnen. Vielmehr ist die Einbürgerung der Schlussstein eines gelungen Integrationsprozesses. Die Regierungschefin für diese Mitbürger ist Angela Merkel, nicht Herr Erdoğan.”

(*Einwanderungsland*), ‘fair participation’ (*faire Teilhabe*), and ‘equal opportunity’ (*Chancengleichheit*) were central terms of this sub-discourse. There were also a number of presuppositions in the ‘humanitarian anti-discrimination sub-discourse’. Politicians of this sub-discourse assumed that Germany needs a new ‘We’-feeling, a collective spirit for a new German society, not based on an identity of German ethnicity, but a collective identity beyond ethnicity. MP Memet Kiliç (Green Party) insists on October 7th 2010: “We must develop a We-feeling. This is our land; we immigrants and our children love our country Germany” [authors translation]²⁶ (Deutscher Bundestag, 2010a, p. 6801). In this process of creating a non-ethnic identity, dual citizenship is expected to lead immigrants to identify with Germany and enable a collective identity with multiple identities beyond ethnicity. This new diversity is further presumed to strengthen Germany and its economy for the future.

These politicians presuppose that the existing integration deficits are mostly not the fault of immigrants, but the errors of an uninterested, latently xenophobic German society. Hence, it is believed that less discrimination will further integration, which together with working and learning the German language is central for a successful integration. However, politicians using this sub-discourse understand that German is best learnt in Germany and not abroad, as a family unification requirement for spouses to learn German before coming to Germany requires it. This is assumed to be very difficult for immigrants, and not as open and welcoming. Although politicians using the ‘humanitarian anti-discrimination sub-discourse’ presumed that these language courses abroad do not stop forced marriages, they were still convinced that the German state can

²⁶ In German: “Wir müssen ein Wirgefühl entwickeln. Dies ist unser Land; wir Einwanderer und unsere Nachkommen lieben unser Land Deutschland.”

protect young immigrant women from forced marriages and empowering them by participation in integration courses after arriving in Germany.

The ‘humanitarian anti-discrimination sub-discourse’ comprised many predications as well. Proper integration was described by politicians of the ‘humanitarian anti-discrimination sub-discourse’ as a reciprocal process between immigrants and the German host society, which entailed less discrimination of immigrants by and immigrants’ participation in the German society. Central for integration are equal opportunities for immigrants to work, as this shows them their dignity and respect of Germany, which would, assisted by better education for the youngest, dual citizenship and multiple identities, further integration. On November 25th 2012, MP Memet Kiliç points out:

The participation in the working life is of central importance for social participation; in employment, one connects and socializes, as well as experiences appreciation. This is how integration works in the everyday life. Yet, humans with migration background suffer tremendously from discrimination on the labour market [author’s translation].²⁷ (Deutscher Bundestag, 2012a, p. 24372)

Immigrants in this sub-discourse are characterized as great, able individuals who contribute considerably to Germany’s economic success and overcame many obstacles that they had to face in Germany, which has to be acknowledged. They are pictured as deserving Germany’s appreciation for these achievements. As a token of gratitude, poor, old, working class immigrants that build the country are portrayed as deserving special access to citizenship because of their contributions to Germany although they might not

²⁷ In German: “Die Beteiligung am Arbeitsleben hat eine zentrale Bedeutung für die soziale Teilhabe; denn am Arbeitsplatz knüpft man Kontakte und erfährt Wertschätzung. So findet Integration im Alltag statt. Jedoch werden Menschen mit Migrationshintergrund am Arbeitsmarkt in hohem Maße diskriminiert.”

meet some requirements of normal naturalization. Family unification and refugee protection are illustrated as important humanitarian facets of the German nation, and should not be restricted. Taken together, Germany is characterized as an *Einwanderungsland*, which is not yet a fully modern, i.e. open and welcoming towards immigrants, European state, as discrimination and other exclusionary *Zuwanderung* provisions still persist, despite considerable progress made in the last years.

The subject positioning around party camps is again central for the ‘humanitarian anti-discrimination sub-discourse’, here between the oppositional parties and the ruling parties. Politicians of the oppositional parties described themselves positively, as those that started the necessary changes in Germany’s *Zuwanderung*, citizenship, and integration provisions and those who are at the height of today’s modern, European *Zeitgeist*²⁸. The Other, the governmental parties are depicted by politicians utilizing the ‘humanitarian anti-discrimination sub-discourse’ as being years too late and backwards, as the governmental parties still oppose dual citizenship, although it is already a widely tolerated practice in Germany. The governmental parties are further described as to do nothing new for integration, but to only cater to their constituents by agitating against immigrants, blaming these for Germany’s and the government’s own failures. All these shortcomings and the fact that the governmental parties force immigrants to choose between the citizenship of their parents and German citizenship leads politicians employing the ‘humanitarian anti-discrimination sub-discourse’ to the conclusion that the governmental Other is hindering integration. In the words of MP Memet Kiliç:

²⁸ Although often blamed by the government parties of having ‘Multikulti’ ideology, none of the main oppositional parties advocated for a distinct multicultural immigrant inclusion as it is practiced in Canada, neither was multiculturalism seen as part of the modern, European *Zeitgeist*.

The obligation to choose exposes those concerned to a considerable and unnecessary pressure to decide. The obligation to choose says: You are Germans with reservation. – This is a fatal message. There must not be first and second-class German citizens [author’s translation].²⁹ (Deutscher Bundestag, 2013a, p. 30603)

Related to the critique by politicians of the ‘humanitarian anti-discrimination sub-discourse’ that the governmental parties are too late and backwards is a subject positioning along temporal lines. In those ‘bad’ times, a temporal Other, as described by Hansen (2006), the governmental parties are depicted by politicians utilizing the ‘humanitarian anti-discrimination sub-discourse’ as to have committed anti-immigrant politics (*Das-Boot-ist-voll-Politik*, ‘the boat is full’ politics) and as to have done nothing for the integration of immigrants for years, which led to some attacks on immigrants by German nationalists. Against this temporal Other, politicians exerting the ‘humanitarian anti-discrimination sub-discourse’ posit an allegedly much more open, tolerant and integrative ‘today’.

Some similarities between the two sub-discourses became apparent. The presupposition that globalization and developments in today’s economy lead to a competition for the best and the brightest immigrants was central in both sub-discourses. It was also often presumed that *Zuwanderung* is necessary in order to grapple with the problems that are occurring because of the problematic demographic trend (*demografische Entwicklung*) in Germany, like a skill shortage (*Fachkräftemangel*). To compete better with classic immigration countries like Canada, Germany is said to be in need to become more attractive for immigrants, for example with an unspecified culture

²⁹ In German: “Der Optionszwang setzt die Betroffenen einem erheblichen und unnötigen Entscheidungsdruck aus. Der Optionszwang besagt: Ihr seid lediglich Deutsche unter Vorbehalt. – Das ist ein fatales Signal. Es darf keine Deutschen erster und zweiter Klasse geben.”

of welcoming (*Willkommenskultur*), or less discrimination to attract and keep more immigrants. As already mentioned, almost all politicians involved in these debates assumed that learning the German language is very important for integration of immigrants, very close in importance to other presuppositions concerning integration, like working in Germany and contributing to Germany's economic success. Both sub-discourses included a predication that described immigrant women in need of the German's state protection from forced marriages and gendered violence. This predication was more pronounced in the 'exclusionary integration sub-discourse', and in this sub-discourse included a blaming of immigrant communities as the most common causes for immigrant women's suffering.

The differences in the sub-discourses in Germany were quite large, for example with regard to who is seen as the culprit who causes integration deficits of immigrants in Germany. Politicians utilizing the 'exclusionary integration sub-discourse' blame immigrants for their integration deficits, as they are said to have inferior German language skills, invest too little in their children's education, are more often unemployed than Germans although the economy is growing, and engage in backward practices like forced marriages that violate the important German value of gender equality. In the 'humanitarian anti-discrimination sub-discourse', it is Germany's discrimination of immigrants in the labour market, the education system as well as exclusionary, discriminatory public debates that hinder integration in Germany. Hence, immigrants are either described as to have few positive and many deficits by the 'exclusionary integration sub-discourse', or as victims of Germany with a few qualities, like bringing diversity to Germany. This sub-discourse construes Germany as an *Einwanderungsland*,

whereas the ‘exclusionary integration sub-discourse’ gives Germany the label country of integration (*Integrationsland*³⁰). Although it is an *Einwanderungsland* for politicians of the ‘humanitarian anti-discrimination sub-discourse’, Germany is still painted as not to be a modern, open, and welcoming European country yet, unlike other modern European immigration countries. The other sub-discourse describes this country of integration as already modern, open and welcoming, a truly European country.

The way integration and citizenship interact is another reason for the difference between the sub-discourses. Whilst politicians of the ‘exclusionary integration sub-discourse’ are convinced that integration has to come first, and only afterwards as a reward for ‘good’ integration can German citizenship be granted. The ‘humanitarian anti-discrimination sub-discourse’ contains the understanding that citizenship can further integration and hence should be granted somewhere along the unspecified road of successful integration. This understanding leads to an important difference of how identity is seen in the sub-discourses. The ‘humanitarian anti-discrimination sub-discourse’ conceives multiple identities, like German and Turkish, as possible and even desirable, whereas the other sub-discourse sees the odds of multiple identities unfavourably and prefer immigrants aligning with a German identity. German ethnicity still seems to play a role in the ‘exclusionary integration sub-discourse’ that can be seen in this sub-discourse’s understanding of *Spätaussiedler* as a special group that is hardly comparable to other immigrants from Turkey or Italy. This notion is hardly present in the other sub-discourse, where politicians treat *Spätaussiedler* as normal immigrants.

³⁰ This concept of *Integrationsland* is still largely undefined, and is most likely used by politicians of using the ‘exclusionary integration sub-discourse’ as part of a political strategy in order to stress that integration of the already present immigrants and not letting more immigrants in, is the primary problem that Germany has to face.

From the discourse analysis undertaken in this chapter, it appears that the immigration and integration sub-discourses in Canada share some core ideas of, like multiculturalism or of being a country built by immigrants, and differ mostly on policy proposals of how to deal with refugees or how much to favour economic immigrants. In Germany, the sub-discourses agreed on far less, for example on the necessity of new immigrants to learn German for a successful integration process. However, there was no agreement between the two major sub-discourses about whether Germany could be considered an *Einwanderungsland* or not. The extent to which the German state should enforce integration remained contested as well.

Findings and conclusions

My central research question guiding this study was: What similarities and differences can be found in Canada's and Germany's immigration and integration discourses between 2008 and 2013? I will now return to this question. I will do so by comparing the four major sub-discourses of Canada and Germany, and point to similarities and differences between the discourses, and whether one can speak of a convergence of discourses or whether different national traditions remain stronger in shaping the immigration and integration discourses. Afterwards, I will address shortcomings, potential avenues for further research, and a brief outlook of immigration and integration discourses in Canada and Germany in my concluding remarks.

The only topic all four sub-discourses in Canada and Germany share is the presupposition that both countries are in a tough competition for the best and brightest immigrants with other important immigrant destination countries, like Australia. All other similarities could only be located between the two 'exclusionary sub-discourses' of Canada and Germany on the one hand and the two 'humanitarian sub-discourses' of both countries on the other.

The 'exclusionary economic utility sub-discourse' in Canada and the 'exclusionary integration sub-discourse' in Germany share some similarities. Both sub-discourses show a tendency to blame shortcomings of integration and problems of immigration on immigrants. When these sub-discourses describe immigrants positively, they mostly focus on the economic contributions older immigrant cohorts brought to the country. Immigrants, especially when they arrive in assumed overly large numbers or are of wrong 'quality', i.e. low skilled and hence potentially unemployed, are blamed for

potentially increasing the dissatisfaction of Canadians and Germans with their immigration system or even for outright xenophobia that develops as a consequence of this immigration.

This favouring of the national Self appears in another way, too. In both sub-discourses, Canada and Germany are characterized as already great, open, and welcoming, with no need for radical changes in order to improve immigration (in Canada) and integration (in Germany). Politicians operating in both sub-discourses are convinced that they are able to protect certain facets of Canada and Germany, like the value of German or Canadian citizenship or the integrity of Canada's immigration system from an alleged threat by the 'wrong' kind of immigrants. Lastly, both sub-discourses are extremely bothered by illegal migration, as it is not manageable and undermines attempts to let only the 'good', i.e. productive and employable immigrants in.³¹

The 'humanitarian nation building sub-discourse' in Canada and the 'humanitarian anti-discrimination sub-discourse' in Germany share some similarities as well. Politicians of both 'humanitarian' sub-discourses delineate their respective country as a country of immigration and as greatly shaped by immigration. Both emphasize fair treatment of immigrants in the host societies and stress the humanitarian side of immigration, like family reunification and refugee protection, over an understanding that only values and justifies immigration in economic terms. Immigrants in both sub-discourses are characterized as contributing to the culture of each country by expanding diversity. The benefits in this sub-discourse are described as mutual for both immigrants and the country itself. In both 'humanitarian' sub-discourses, politicians show their

³¹ Although it was not the major focus of my research, I had the impression that the 'exclusionary' sub-discourses in Canada and Germany tend to securitize immigration and integration issues, like refugees or Islam, in order to combat illegal immigration and Islamic terrorism.

gratitude and appreciation for immigrants' labour, which is described as being hard and difficult, but also as having contributed to building the country. It is presumed that problems with immigration and integration are not the fault of immigrants: instead both humanitarian sub-discourses blame their respective country for the problems. In Canada problems are assumed to result from bad immigration policy, whilst in Germany bad integration outcomes stem from Germany discriminating and neglecting immigrants.

Politicians utilizing the 'humanitarian nation building sub-discourse' and 'humanitarian anti-discrimination sub-discourse' expect that their respective states can protect immigrants, who are depicted as vulnerable regarding the problems that they encounter in their new country of residence, mostly exploitation in Canada and discrimination in Germany. Both sub-discourses share the presupposition about the need of a 'We' feeling of both immigrants and host society, implying that communities that share and live together are better than divided communities conjured by a rhetoric of difference. Lastly, both sub-discourses construe the possibility of multiple, non-ethnic identities and see dual citizenship as unproblematic, or even as assisting immigrants on their way to integration.

Many differences between the four sub-discourses in the two countries remain. A central one is that both sub-discourses in Canada take integration almost for granted and see it as a process that does not need specific attention of parliamentary debates, but which can be left to well-funded settlement services in the provinces. When Canadian politicians who use both sub-discourses speak about integration, they usually focus on the legal-political and socio-economic dimensions of integration (Entzinger & Biezeveld, 2003, p. 10-25). In Germany, the debate in the research period is in contrast to a large

extent focused on integration, for example on how to integrate Muslims into the German state church relation law (*Staatskirchenrecht*) or how to improve immigrants performance on the labour market. Especially the ‘exclusionary integration sub-discourse’ with its verdict of Germany as a country of integration (*Deutschland ist Integrationsland*), which stresses integration instead of notions of Germany being an *Einwanderungsland*, pushes debates on integration issues. The ‘exclusionary integration sub-discourse’ is unique in this study as it is the only sub-discourse to stress the cultural dimension of integration over the socio-economic and legal-political dimensions, whereas the ‘humanitarian anti-discrimination sub-discourse’ is more careful in emphasizing the cultural side of integration, but rather focuses on the socio-economic and legal-political dimensions. Still, in the German sub-discourses, learning German is pictured as central for successful integration, whereas in the Canadian sub-discourse learning the language of the host country is brought up less often in political debates, probably because good language skills are a basic immigration requirement and thus taken for almost granted. Moreover, Canada as a multicultural, multinational (i.e. English Canada, Québec, and First Nations) country has two official languages and hence does not define its nationality along one official national language only, as it is the case in Germany with the German language.³²

In Canada, immigration is an important tool of nation building and central for the multicultural society many Canadians are proud of. This role of immigration is considerably different to the situation in Germany. Germany so far, although it is heavily contested, did not break completely with an understanding of Germany as the nation of

³² The province Québec is a special case in Canada, which, like Germany, defines its national character with strong reference to the French language. Nonetheless, Canada (consisting of English-speaking, French-speaking, and First Nations groups) taken together appears to me as to have a multicultural, multinational tradition that is quite different from Germany.

(ethnic) Germans, something that the reality of *Zuwanderung* did not change during my research period between 2008 and 2013. The high annual intake of immigrants in Canada is hardly contested politically by Canadian politicians, whereas German politicians sometimes question the necessity of increased *Zuwanderung*. Both sub-discourses in Canada postulate the pride Canadians take in multicultural Canada as an open, generous, welcoming, and diverse country as well as the pride Canadians show towards their welcoming, generous history, being a country built by immigration. Germany does not take pride in diversity and generosity, at least not in parliamentary debates.

Lastly, the ‘humanitarian anti-discrimination sub-discourse’ does not use the word ‘pride’ at all, especially not with regard to German history, whereas the ‘exclusionary integration sub-discourse’ uses the term pride solely with regard to older ‘German’ achievements, like the literature of Goethe, which stem from times when Germany was seen as a nation based on ethnicity and hence immigrants are seen as to not have contributed to this ‘proud’ nation in a meaningful way (yet).

Which expectations regarding the immigration and integration discourses in these countries that I developed in the introduction and in chapter three can stand, and which have to be discarded as unfounded? The expectation that discourses converged under the influence of international human rights standards, as deducted from Triadafilopoulos (2012) and others, could not be verified. Although there is an overarching consensus in Canada and Germany about the need to compete with other immigration countries, and some similarities between the ‘exclusionary’ and the ‘humanitarian’ sub-discourses exist, this is not enough to deduct convergence of the immigration and integration discourses in

Canada and Germany from my discourse analysis.³³ The immigration and integration discourses in both countries make reference to international norms such as the UN Convention on the Status of Refugees, the UN Charter of Human Rights, or other international values. For example, on September 20th 2011, MP Anne Minh-Thu Quach (NDP) stated that Bill C-4 “violates [...] the Convention relating to the Status of Refugees, which prohibits States from imposing sanctions on refugees because of their illegal entry” (openparliament, 2014b). However, the immigration and integration discourse in Germany refers to these international standards less often, instead references European values and norms like EU regulations or standards of the European Charter of Human Rights, and compares Germany with other European states more frequently. For instance, on May 20th 2010, MP Reinhard Grindel (CDU) defended language requirements for family reunification by claiming, that “this provision is in accordance with European Union law, as the [EU] directive concerning family reunification explicitly allows EU member states to make reunification dependent on the fulfilment of integration requirements” [author’s translation]³⁴ (Deutscher Bundestag, 2010, p. 4373).

Convergence seems even less likely as emulation did not seem to happen. Canada’s success is brought up in Germany from time to time, but only in contexts with other major immigration countries and not in a way that led to a convergence. Some politicians ridicule multiculturalism in the German discourse, whereas in Canada it is a

³³ I suggest that the similarities probably stem from ideas, like the value associated with labour, which are specific to each party family, like the social-democratic party family. These are ideas which can be found in many parties of the same family in many Western countries, which are further partly independent from any particular national context (Mair & Mudde, 1998, p. 211-214).

³⁴ In German: “[D]ie Regelung [zur Familienzusammenführung ist] auch mit dem Europarecht vereinbar, weil die Richtlinie über die Familienzusammenführung die EU-Mitgliedstaaten ausdrücklich ermächtigt, den Nachzug der Betroffenen von der Erfüllung von Integrationsanforderungen abhängig zu machen.”

central concept for national identity and immigrant integration. Even more, no Canadian politician in the speeches I analysed considered comparing Canada to and taking lessons from a country like Germany that does not exactly have the reputation of being a role model country of immigration. It appears that no convergence through emulation took place (Bennett, 1991, p. 220-223).

I suggest that my expectation, based on scholars like Kymlicka (Banting & Kymlicka, 2010) and others (Dolezal et al., 2010), according to which the different traditions in Canada and Germany shape the discourses in those countries most decisively, can be considered as right. As outlined above, my discourse analysis found some similarities. However, after having compared the discourses of immigration and integration in both countries, it appears that the differences between these discourses, which are influenced by their respective national traditions, remain strong. I identified Canada's national tradition with regard to immigration and integration something that Will Kymlicka calls a 'three-legged stool': A mutual reinforcing relationship of persistent policies of and self-understanding based on multiculturalism, a self-understanding as a country of immigration, as well as the role citizenship plays for Canada are central for Canada's national tradition. All three concepts are important and influential for Canada's immigration and integration discourse, as they repeatedly appear in both sub-discourses in the Canadian Parliament.

The picture with regard to my expectations about German national traditions was mixed. I suggested persistent perception of German language, of German ethnicity, and persistent policies of *ius sanguinis* as central for a German national tradition with regard to immigration and integration. Germany's national traditions here are much more

contested than it is the case in Canada. Although *ius sanguinis* (an ethnic conception of citizenship) still plays a role for citizenship policies, it is to a large extent rejected in the ‘humanitarian anti-discrimination sub-discourse’. An emphasis on the German language was present in both sub-discourses; hence it can be argued that this aspect of German national tradition of immigration and integration was influential on the German immigration and integration discourse. It appears that ethnic conceptions of German national tradition have been largely replaced by cultural aspects, like language, although they are not completely gone yet, as can be seen from the preferential treatment the ‘exclusionary integration sub-discourse’ gives to *Aussiedler* and the way this sub-discourse still defends German *ius sanguinis* citizenship. Ethnicity was considerably less important for the German immigration and integration sub-discourse than expected, hence I argue that ethnicity is no longer a driving concept of German national traditions with regard to immigration and integration. Nonetheless, Germany’s contested national tradition combined with a, not yet completely lost, ethnic heritage still casts its shadow over the German discourses of immigration and integration, rendering it more exclusionary compared to its Canadian counterpart.

Many other findings appeared during my research for this thesis, which, however, could not be addressed sufficiently given the limitations of a MA thesis. I will point out a few of them in the following paragraphs. As mentioned in the introduction, I was interested in the relation of immigration and integration discourses and economic crisis, which led me to look for traces of possible connections of immigration and integration discourses and policy contexts. All ideas I bring up here are researched only briefly and hence should be understood as speculations that need further research in order to find

whether they are appropriate or not. For example, it appears from my research that only one specific discourse, the discourse that constructed a competition between nations for ‘the best and the brightest immigrants’ in times of globalization, often framed as neoliberal discourse, was similar in all countries and highly influential on politics. It led to the introduction of policies that favoured economic immigrants in Canada, like the Bill C-50 of 2008, or policies that made it easier for immigrants, who were selected in order to fill labour shortages, to come to Germany, as could be seen from the introduction of the Blue card immigration mechanism. This preliminary finding could be expanded in future research.

Other preliminary ideas about possible interaction of discourses and policy contexts include: A liberalization of immigration laws is not necessarily accompanied by more inclusive immigration and integration discourses, instead it appears that politicians can either use another discourse, like the globalization discourse, to justify liberalization or even push it through without any accompanying societal debate. Moreover and contrary to the often heard argument, the economic crisis of 2008 did not lead to more exclusionary discourses in Canada and Germany, maybe because it was not long and severe enough, but, based on my discourse analysis, it appears that the emergence of exclusionary immigration and integration discourses depends to a large extent on politicians to introduce exclusionary discourses that blame immigrants for the economic shortcomings. It hence appears that there is no necessary mechanism that leads from an economic recession to more exclusionary discourses.³⁵

³⁵ Another example here would be Portugal. This small, comparably poor country maintained an open and welcoming immigration climate despite a much more severe economic crisis after 2008. Other factors have to be taken into account as well, like the discursive construction of immigrants as poor victims of the recession and in this equal to ordinary Portuguese citizens and not as

In a similar vein, just high numbers of immigrants do not matter as much taken alone, but the way in which the figure of the immigrant is constructed in debates is crucial for the emergence of exclusionary immigration and integration discourses. Although some politicians argued that larger immigration numbers could stir public opinion negatively towards immigration, my research points into a different direction. For instance, the Canadian politicians utilizing the ‘exclusionary economic utility sub-discourse’ did not argue for restrictions because of the high quantity of immigrants, but rather because of the qualities and predications they assigned to certain immigrants, like ‘illegal’ or ‘queue jumper’. These were central for the restrictions passed on refugee laws. In Germany, certain integration laws could only be passed because some immigrants were framed as possessing certain, clearly negative, qualities, like higher unemployment or insufficient language skills. It appears that predication of qualities in discourses have a strong impact on policy contexts: the worse the discursively constructed quality, the more exclusive the laws for ‘these’ people. There appears to be no automatism that leads us from higher immigration numbers to more exclusionary discourses or policies, but it strongly depends on how politicians construct immigration in the public. Many scholars have pointed to this, described for example as the “construction of target population” by Anne Schneider and Helen Ingram (1993).

As high immigration numbers do not lead directly to higher xenophobia or exclusionary discourses, it is more the qualities, like ‘illegal’ or ‘unemployed’ that politicians assign to some groups of immigrants that are central for the construction of exclusionary discourses. This influence of politicians on discourse, as mediators between

culprits who take away Portuguese people’s jobs (Huddleston et al., 2011, p. 158). Surely, this case needs more research in order to sustain my preliminary finding.

policy contexts and discourses, leads me to another unexpected observation. Foucault and Derrida, on whose *œuvre* this work is partly built, are opposed to liberal individualism and hence often do not stress individual agency, and hence rather focus on the non-personal character of laws or networks of power (Diez, 1999). However, it appears from my research that politicians still have many possibilities to act, and consequently a lot of responsibility, for example for xenophobic reactions to immigration that result from an increased utilization of exclusionary strategies in discourses.

There are many possible ways to conceptualize links of discourses and policy contexts. I suggest that it is helpful to look at the policy implications that come together with each sub-discourse to elucidate the interaction between discourses and policy contexts, which, of course, need more research and are only briefly sketched out here. Loosely related the work of David Snow and Robert Benford (1988, 2000) on frame analysis, some policy implications that emerge from these different traditions and from the similarities that seem to stem from party family topics can be outlined briefly, which is summed up in Table 3. Politicians utilizing the ‘exclusionary economic utility sub-discourse’ diagnose that bogus refugees take advantage of Canada’s system of generous refugee protection. This reveals an uneven state/immigrant power relation that gives the former the subject position (Diez, 1999, p. 602-604) of the protector of Canada’s integrity and the latter the role of a fraudster that has to be combated. The policy proposal that stems from these descriptions leads politicians to conclude that refugee assistance has to be reduced in order to deter fraudulent behaviour, exemplarily done in Bill C-11 (openparliament, 2014a).

Sub-discourse	Diagnose	State/immigrant relation	Policy implications
Exclusionary economic utility	Bogus refugees plunder Canada's generous immigration system	Protector/fraudster	Cut refugee funding to deter fraud
	'Good' immigrants built and build Canada	Benefiter/contributor	Increase 'good' immigration
Humanitarian nation building	Refugees need Canada's protection	Protector/victim	Do not change refugee policies
	'Good' immigrants built and build Canada	Benefiter/contributor	Increase 'good' immigration
Exclusionary integration	Immigrants in Germany have integration deficits	Entity and facilitator of integration/target of integration	Integrate immigrants into German society, even with sanction
	'Good' integration involves learning German		Teach immigrants German
Humanitarian anti-discrimination	Germany discriminates immigrants	Discriminator/victim	Stop discrimination
	'Good' integration involves learning German	Entity and facilitator of integration/target of integration	Teach immigrants German

Table 3: Sub-discourses and policy implications

Quite dissimilar, politicians exerting the 'humanitarian nation-building sub-discourse' do not diagnose bogus refugees as problematic, but as victims who have to be protected by Canada, leading to a power relation of Canada as a protector of refugees and refugees as victims who have to be protected. Consequently, these politicians oppose Bill C-11. The uncontested identity of Canada as a country of immigration, however, led politicians of both sub-discourses diagnose that immigrants built and still do build Canada, construing a relation of Canada as benefiter and immigrants as contributor. Hence, more 'good' immigration was favoured, with varying definition of what 'good' actually means, as it happened in the debate about Bill C-50 (openparliament, 2014e).

In the ‘exclusionary integration sub-discourse’ immigrants are diagnosed with having many integration deficits. This leads to a power relation in which the German nation state becomes the facilitator of immigrants’ integration. At the same time, the German *nation* state becomes the entity into which immigrants have to be integrated into, who are also the targets of integration policies. Hence, Germany’s policy towards immigrants suggests a state-led integration that even makes use of sanctions to force immigrants who are ‘unwilling’ to take part in integration measures, as can be seen by the prominence of ‘facilitate and demand’ policies (*Fordern und Fördern*) in German integration policies (Deutscher Bundestag, 2008a, p. 15430-15462). The relation that gives the German *nation* state the position as being both the facilitator and the goal of integration as well as that immigrants have to be targeted for successful integration is also present when politicians, who apply the ‘exclusionary integration sub-discourse’, talk about language and integration. Here, the diagnosis is that ‘good’ integration involves learning the German language, which leads to policy proposals of language course introduction and expansion (Deutscher Bundestag, 2010a, p. 6792-6813). This policy implication, power relation, and diagnosis can also be found in the ‘humanitarian anti-discrimination sub-discourse’. This sub-discourse also stipulates that immigrants are discriminated by the German state, implying a power relation of Germany as discriminator and immigrants as victims of this discrimination. Hence, the policy implication here suggests fighting discrimination of the German state in order to further integration (Deutscher Bundestag, 2012a, p. 24367-24373). Of course, these preliminary findings from my research on possible connections of policy and discourses need to be

sustained by further research, but the combination of discourse analysis and framing I used in the last paragraphs could be one way forward.

There are more aspects that could be researched in order to better understand the interactions of policy contexts and discourses with regard to immigration and integration. For example, as indicated in this thesis, competitive party politics and party families appear to shape immigration and integration politics and discourses (Bale, 2008, p. 316-322). One could, for example, identify in which ways party families shape discourses about immigration and integration across several nations. A researcher could furthermore look at politicians' political strategies as politicians have such an impact on the formation of policies and the shifting of discourses. He or she could ask how politicians mobilize certain discursive practices to legitimize their policy formation, or which strategies of power politicians use to get their policy proposal into practice or get elected in the first place. It could even be researched how politicians and other societal elite actors, like the media, manipulate humans via a selective use of knowledge. In this case, the research would include elements of social psychology, and would go beyond the disciplinary boundaries of political science (Van Dijk, 2006) and also return to Foucault's understanding of power and knowledge as deeply intertwined (Foucault, 1984). The idea of Foucault that power does not exclusively reside at the top but pervades any society and shows itself best when resisted, brings in another avenue of potential research (Foucault, 1982, 794-795). Hence, instead of focusing on elites of countries, an interested scholar could research how power works at the lower levels of society, for example, by looking at how immigrants resist state power that enforces neoliberal, i.e. driven by economic considerations, exploitative, temporary foreign worker programs (Leach, 2013).

Expanding Lene Hansen's (2006) approach, the researcher could unravel the immigration and integration discourses into more than just two sub-discourses per country. Instead of the two rather broad ones that aggregate separate topics, he or she could separate the discourses strictly thematically into for instance a humanitarian, a party political, an economic utility, a globalization, or an integration-focused sub-discourse. This would allow for a more detailed description of sub-discourses and hence a different comparison, which could lead to different interactions with policies. Immigration and integration sub-discourses could also be examined by including more research material from different sources, like media publications, contributions from literature, like the non-fictional book of Thilo Sarrazin that shaped the discourse in Germany considerably, or texts published by radical activist groups from either the right or the left wing (Perlmutter, 1996, p, 378). Hansen describes these sources as research models two and three. Even Internet blogs, twitter or facebook comments on issues of immigration and integration could be taken into account in order to describe the discourses of immigration and integration that pervade a society.

To get a deeper understanding of similarities and differences in discourses and policy contexts, a scholar could include more or different countries into the comparison. Interesting countries for me would be the UK, the Netherlands, France, and Portugal. All four countries witnessed critical changes of immigration and integration laws, which were accompanied by discursive shifts. For example, instead of Germany, one could compare both Canada and the UK, as both countries share similar political systems and institutions, as well as a common imperial history. Instead of Canada, the researcher

could contrast Germany, France, and the Netherlands as all three countries witnessed a similar temporary, which became a permanent, labour immigration after World War II.

I suggest several prospects for the further developments of the immigration and integration discourses and policy contexts in Canada and Germany. Debates about these issues will continue to be fought with intensity and will remain contested in both societies, more so in Germany than in Canada. As the German discourse of *Zuwanderung* and integration is changing quite frequently, it could move towards more liberalization and more inclusion. However, at the moment I believe that Germany is more likely to witness a discursive and policy shift that is more similar to what many other Northern European countries, like the UK, the Netherlands, Norway, and Denmark have experienced. The newly emerged right wing populist party *Alternative für Deutschland* (Alternative for Germany, AfD) could continue to grow in strength, similar to what happened in other European countries, thereby increasing the exclusionary component in the German *Zuwanderung* and integration discourse. As it seems likely that *Zuwanderung* from Southern Europe will continue, and more and more refugees will arrive from Syria or Iraq, I suggest that the German public opinion, the discourse of *Zuwanderung* and integration as well as policies will turn towards more exclusion. At the moment, the picture is mixed. While the German government is planning to restrict refugee provisions and broaden the safe country list, it also increases the range of persons who are allowed to carry dual citizenship.

Although immigration issues in Canada are contested, the discourse in Canada appears to change only little, with a less intense and controversial debate than in Germany. The Conservative Party, in order to gain the important immigrant vote, a

strategy that is essential to remain in power in Canada today, does not seem to attempt to change the status quo of immigration and multiculturalism. However, I suggest that the ruling Conservatives, with many leading figures having roots in the anti-immigration Reform Party, might attempt further restrictions of immigration and integration policies, while still paying lip service to Canada's 'great' multiculturalism. Although the Canadian immigration discourse has shifted only little, politicians like Jason Kenney did show in the past that they are willing to change it, eventually even shaping Canada's multicultural immigration discourse more forthrightly and thus perhaps introducing more exclusionary measures with regard to refugees. As one sign for this conclusion could stand the planned citizenship reform Bill C-24 of the new Minister of Citizenship, Keith Alexander, in which the government states that it wants to protect the value of Canadian citizenship by restricting eligibilities (openparliament 2014f), quite similar in tone to the protection of German citizenship that could be seen from the centre-right parties in Germany as well.

To be clear, these are only possibilities, as contingency plays such a central role in politics. Immigration and integration discourses and policies depend on verbal fights and debates in politics, and on which majorities come to power. If the Conservative government does not get re-elected in 2015, the immigration and integration related national tradition of Canada, as a country of multicultural immigration could remain unaltered. In case the Conservative government gets elected as a majority government again, Canada's nation identity could be challenged more dramatically. Regardless how politicians will decide, immigration and integration policies and discourses are likely to remain central in democratic and societal debates in the future and will require an ongoing scrutiny of the societies in general and political scientist in particular.

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