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**POLITICAL CONSEQUENCES OF MASS-MIGRATION:
GERMANY, SINGAPORE AND JAPAN CONFRONTING THE
MIGRATION TRILEMMA**

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I hereby declare that I have compiled the paper independently and all works, important standpoints and data by other authors has been properly referenced and the same paper has not been previously presented for grading.

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ABSTRACT

The rise of nationalism in the world is resulting in a polarisation between liberals and nationalists. In particular, anti-immigration nationalism is gaining momentum in Western countries such as the US, Australia and those in Europe due to mass migration. There is a recurring argument that restricting immigration threatens democracy, while liberalisation of immigration threatens the nation-state. Japan has had few immigrants in the past, and there has been little discussion about immigration. However, due to the declining labour force caused by the falling birth rate and ageing society, the country has started to accept foreign workers and has enacted a revised law on immigration. Hence it is necessary to consider how immigration might affect Japanese society in the future. The purpose of this paper is to study the potential impact of mass migration to Japan on Japanese society in terms of democracy and nation-state. In this context, democracy is defined as the right of immigrants such as individual freedom, equality and dignity, while a nation-state is defined as the prevalence of a cultural and political national identity, social cohesion, national security and public order.

In order to investigate the relationship between mass migration, democracy and nation-states, the Migration Trilemma of Reisen (2018) is adapted and used to draw lessons for Japan, by making a comparative analysis with the German and Singaporean cases. The results show that both Singapore and Germany have been confronted with the migration trilemma. Japan will continue to prioritise the nation-state in its immigration policy even as immigration increases. This suggests that Japan should learn from Germany and Singapore and promote immigrant integration policies that avoid the migration trilemma, while balancing democracy and nation-state as the number of immigrants increases.

Keywords: Migration Trilemma, Mass-Migration, Democracy, Nation-State, Comparative Design; Germany, Singapore, Japan

INTRODUCTION

Immigration has raised tensions over whether to ride the liberal wave of democracy or the nationalistic wave that seeks to protect the nation-state. The number of immigrants currently living in Japan has doubled since 1990, from 1,075,317 in 1990 to 2,731,093 in 2019 (Ministry of Justice, 2019). While the number of immigrants thus is rapidly increasing, the number of Japanese citizens is rapidly decreasing. Due to the decline in the working-age population, the Japanese government has decided to take in up to 345,000 foreign workers by 2025 (ILO 2019, 58). The Immigration Control and Refugee Recognition Act (hereinafter referred to as the "Immigration Act") has been amended to promote the acceptance of foreign workers, and a "Special Skills" status of residence has been established. However, if the influx of immigrants continues at this rate, the proportion of immigrants in Japan's total population will increase and this has led to the intensification of the debate on immigration in Japan (Korekawa 2018).

The purpose of this paper is to study the potential impact of mass migration on Japanese society in terms of democracy and nation-state, based on lessons learned from the cases of Germany and Singapore. This paper will use Reisen's (2018) Migration Trilemma framework. Reisen argues that if a state accepts mass-migration, it must choose between democracy and the nation-state and that all three components cannot be achieved simultaneously (Reisen 2018). Thus leading to 3 possible constellations: Hyper-migration + Democracy - Nation state; Hyper-migration + Nation state – Democracy; and Democracy + Nation State – Hyper-migration. Hyper-migration in this paper will refer to mass-migration defined as "the movement of large numbers of people from one geographical area to another" (Pok 2012). These three possible constellations will then be applied to the German and Singaporean cases in order to draw lessons for Japan.

In order to investigate the consistency and practical relevance of Reisen's theory, this paper will use a comparative design to examine whether the migration trilemma manifests itself in Germany and Singapore, two countries with large immigrant populations. This will be examined to show whether decision-making in immigration policy in both countries prioritises democracy or the nation-state. Using the experience of these 2 cases, this paper will then proceed to examine if the

migration trilemma is likely to manifest itself in Japan as well. The paper will thus seek to answer the research question: Will mass migration likely pose a threat to Japanese democracy and / or to the Japanese nation-state?

This thesis consists of 5 chapters. Chapter 1 sets out the theoretical framework of the migration trilemma and explains the methodology for operationalising the research question. Chapter 2 discusses the primary migration status of the three countries. The comparative research in Chapters 3, 4, and 5 is structured around the three factors of the migration trilemma: mass-migration, democracy and nation-state. Chapter 3 studies the German case, and Chapter 4 studies the Singaporean case. Chapter 5 examines how mass-migration will likely affect Japanese society and draw potential lessons for Japan's migration policy.

1. THE MIGRATION TRILEMMA

The world is experiencing increasing flows of refugees and economic migrants. The number of refugees in the world is currently recorded at 68.5 million (UNHCR 2018, 2), and in sub-Saharan Africa, where population growth is a concern, 85% of the motivation for migration is economic (Francisco, Matthieu, Margaux, Montfort, & Mustafa 2018, 21). Immigration is predicted to accelerate the demographic transition of countries across the world in the coming decades (Gonzalez-Garcia, Hitaj, Mlachila, Viseth, & Yenice 2016, 8). In the context of accelerating global migration, Collier (2013) argues that the effects of immigration could be detrimental to the complex social models in countries due to the polarisation between proponents of the exclusion of immigrants and liberal movements that argue for the inclusion of immigrants and human rights. Hannah Arendt's 1943 essay had already pointed out the dilemma between mass-migration and human rights (Arendt 2008, 264-274). From this dilemma, Reisen (2018) constructs the relationship between mass-migration, democracy and the nation-state, as a Migration-Trilemma.

Reisen (2018) argues that it is impossible to implement the three components of mass-migration, democracy and the nation-state for decision making at the same time. Two of the components can be combined, but decision-makers can never have all three simultaneously. The Migration Trilemma is illustrated below:

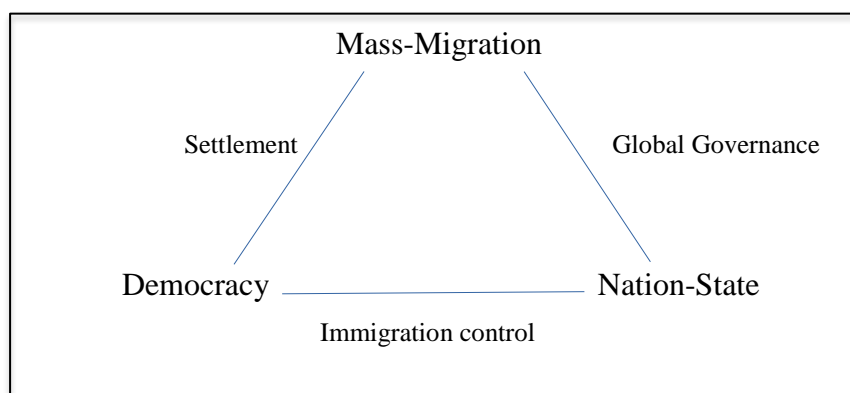


Figure 1. Migration Trilemma

Source: Reisen (2018)

According to the migration trilemma, when decision-makers welcome mass-migration, they must sacrifice either democracy or the nation-state. Reisen admits that this trade-off lacks rigour, however, it cannot be ignored. Reisen (2018) does not provide a precise articulation of criterion for mass-migration, democracy and nation-states. Therefore, it is necessary to discuss these three components in depth to clarify the migration trilemma.

First, as mentioned earlier, hyper-migration in this paper will be taken to refer to mass-migration as defined by Pok (2012). Mass-migration is "the movement of large numbers of people from one geographical area to another and can also refer to a vast number of people resulting in migration from an event or series of events that result in permanent settlement"(Pok 2012). Pok further distinguishes mass-migration from large-scale seasonal migration in that "the latter is characterised by its periodicity and repetition, whereas mass migration usually refers to an event or series of events that may take place over several years or even decades but is nevertheless bounded by time and usually results in permanent settlement" (Pok 2012). As a benchmark of mass-migration for the immigrant share in the population, this paper will use 12.0 per cent, the average of the migrant stock as a percentage of the total population in more developed regions in the United Nations Development Group's UN Migration Stock 2019. If the level of migration is higher than that, it is assumed that mass-migration has occurred.

Secondly, in this paper, democracy will be considered to have been preserved based on whether or not the three guiding principles that are common premises of liberal democracies, namely; individual freedom, equality and dignity (Nebhan Aydin 2019, 75), are also reflected in policy towards immigrants. In order to indicate that these principles are reflected in the immigrant population, the paper will use the three immigrant rights advocated for by Ruhs (2015, 96); economic rights, social rights, and the right to settlement and family reunion. Furthermore, the paper will use the right to freedom as a fourth indication. First, economic rights indicate whether immigrants and citizens are on a level playing field in the labour market, existence of equal pay, and the freedom of employment choice (Ruhs 2015, 97). Second, social rights indicate whether public services and welfare benefits are guaranteed to immigrants (Ruhs 2015, 98) and this will be used to examine the attitude of the host country toward refugees and asylum seekers. Third, the right to settlement and family reunion indicates whether access to the settlement (permanent residence and citizenship) is easy, and family reunion is allowed (Ruhs 2015, 99). Finally, freedom rights indicate whether immigrants are guaranteed freedom of speech, freedom of expression and freedom of association.

Thirdly, a nation-state in this paper will be defined as 'an exclusionary political space ruled by a single, supreme centre of decision-making which claims to represent a single political community or identity' (Burchill, Linklater, and Devetak 2013, 201: Theodorakis, 2014, 40). Ruhs (2015, 16) argues that a nation-state is based on six factors: economic efficiency, distribution, national identity and social cohesion, and national security and public order. In this paper, the four elements of national identity and social cohesion, and national security and public order will be used to indicate how mass-migration affects the nation-state. According to Ruth (2015, 69), immigrants generate a social and cultural impact on the host nations' national identity and social cohesion. In countries where immigrants have historically assimilated, national identity can be defined by cultural diversity, and immigration is tool that increases this diversity. In contrast, culturally homogeneous host nation may see immigrants from different cultural backgrounds as a threat if they perceive them as a dilution of their national identity who can cause fragmentation of the social cohesion in their nation (Ruth 2015, 70). The direct impact of migration on national security and public order is debatable, but when factors such as host country border controls, economic factors and policy initiatives are included, migration can threaten security and public order (Ruth 2015, 71-72).

According to Reisen (2018), the Migration Trilemma applies three possible constellations:

1. Mass-migration + Democracy - Nation state
2. Mass-migration + Nation state - Democracy
3. Democracy + Nation State – Mass-migration

The first constellation is to choose democratic actions and accept immigrants which results in a threat to the nation-state. In this case, the nation-state's four elements mentioned above might harm policy decisions taken under democratic values. In terms of national identity and social cohesion, the large number of immigrants may threaten the national identity of the host country, as they are given the opportunity to assert their rights, thereby, the conflict between opinions respecting the rights of immigrants and the nationals creates social division. Indeed, the 2005 and 2007 riots by French immigrants are examples of this. Discrimination against the immigrant population created discontent within the community leading to riots (Koff & Duprez 2009, 723). This was rather the restriction of immigrants' rights that led to the protests, not the granting of immigrants' rights that led to the protests of the nationals. It is, however, a case of migrants being able to express their resentment because they were given the right to freedom. Similarly, the dual effects of immigration and democracy increases the power of populists and can cause political divisions. Haidt (2013)

argues that moral judgments on specific issues by immigrants are dependent on their country of origin, hence, migrants with different values can cause social division. This is problematic because the immigrants' identity in ethics and morals reverts to the values of belonging rather than those of the host country (Haidt 2013). In national security and public order, the liberal acceptance of large numbers of immigrants can result in poor border control that may allow illegal immigration and terrorist (Ruhs 2015, 71-72). Furthermore, this acceptance of large numbers of immigrants may increase the crime rate due to factors, such as economic struggles and political initiative (Ruhs 2015, 71-72). The frustration caused by the above three factors can also lead to xenophobia and increased crimes against immigrants by the nationals.

The second constellation is to protect the nation-state by accepting large numbers of immigrants while discounting democracy. In this case, policy decisions are made with the aim of maximising the interests of the nation-state at the expense of the democratic rights of immigrants. Restricting the immigrants' freedom of speech and association and curtailing migrant's human rights by law prevents threats to the nation-state. However, this contradicts democracy, as it may lead to loss of the immigrants' freedom and identity (Collier 2013, 15).

Finally, the third constellation is to avoid mass-migration. In this case, it is a prerequisite that the country can maintain its production without relying on foreign workers. Reisen (2018) argues that Global governance of migration can be the way to avoid mass-migration. The Global Migration Compact (GMC), a first intergovernmental arrangement endorsed in Marrakesh 2018 by the UN member states except for the US is the closest the world has come to having a global migration framework (IOM, 2020). It aims to endorse international cooperation on the governance of migration by providing a menu of policy options to address issues related to international migration (IOM, 2020). However, the GMC draft in Section 7 states that the Compact “presents a non-legally binding, cooperative framework that builds on the commitments agreed upon by the Member States in the New York Declaration for Refugees and Migrants”. Thus, global governance is not effective in the Compact because it does not have legal force as it allows each country to make its own decisions. Therefore, at this stage, the GMC cannot be considered to avoid mass-migration as it is only possible to control the flow through domestic immigration laws. The effects of temporary mass-migration may be eliminated, but immigrants will have to be accepted if there is no productive capacity in the country when necessary. Therefore, it may not be feasible for some countries to eliminate mass-migration in the long term.

However, does mass migration necessarily result in a dilemma between democracy and the nation-state, i.e. does the granting of democratic rights necessarily undermine the nation-state? It would seem that migrants can be integrated into the host society adopting its norms and values, thus not threatening the national community and identity. According to Reisen (2018), in the past, Argentina, Australia, Brazil, and sparsely inhabited regions before colonisation, it was possible to create a melting pot by promoting the immigrants' assimilation. At first glance, this appears to dissolve the migration trilemma, but this was possible because they were sparsely inhabited regions and there was no nation-state in place. It is nearly impossible to achieve this in a country where nation-state formation is already in place. However, there may be limits to the integration of immigrants through such assimilation policies. Indeed, Brazil, France and the United States have also proven to have blatant integration deficiencies that would be intolerable in a socially homogeneous society (Reisen 2018).

1.1. Methodology

The purpose of this paper is to study the potential impact of mass migration on Japanese society in terms of democracy and nation-state. In order to usage whether and how the migration trilemma operates in practice, it will be necessary to select cases that have experienced mass migration. Choosing two countries with large-scale migration, Germany and Singapore as case studies, the paper uses a comparative design to test whether this trilemma holds in practice. The hypotheses are: 1. Germany's policy based on democratic values is a threat to the nation-state based on the first constellation; 2. Singapore severely restricts immigrants' rights to protect the nation-state based on the second constellation. Both countries share with Japan about the same economic level, low birth rates and an ageing population. Among the EU countries, Germany was chosen because of its remarkable and liberal mass refugee intake in 2015, which is used to examine the threat to the nation-state. Despite the high immigration rate, Singapore maintains a high level of security and public safety, so finding a link between this high level of security and democracy would help justify the migration trilemma. By considering the advantages and disadvantages, it is hoped that this comparative study will serve as an indicator for Japan's future immigration policy.

First, the paper investigates the immigration situation in each country by conducting both quantitative and qualitative research. Quantitatively, it looks at four items: (1) the total number of

immigrants and the percentage of immigrants in the total population; (2) the growth (or decline) rate of the national' population and the growth (or decline) rate of the immigrant population in each country; (3) the top five nationalities of immigrants; and (4) the number of refugees and asylum seekers accepted as well as the number of unskilled workers. These are calculated based on statistics published by national governments. The number of people and the migration rate are the indicators required to ensure that mass-migration criteria are met. Nationality of immigrants is directly related to a potential threat to a coherent national identity. The number of refugees can determine whether the country has democratic values that respect human rights, and the number of unskilled workers is used to determine the extent to which a country is dependent on foreign workers. The reason for focusing on low-skilled workers is that they are more vulnerable to restrictions on migrant rights than high-skilled workers. For examining nationals' attitudes towards migration, the World Values Survey (2014: 2020) is used.

Next, the paper examines whether Germany and Singapore fit into the migration trilemma case according to the criteria of the three components of the trilemma. In Germany, assuming that the structure of 1. Mass-Migration + Democracy - Nation-State is established, how are the rights of migrants in democracy guaranteed and how are the four elements of the nation-state (national identity, social cohesion, national security and public order) threatened? Conversely, in Singapore, assuming that Mass-Migration + Nation-State - Democracy is established, this paper examines how the two elements of the nation-state are protected and how the rights of migrants are sacrificed. In Japan's case, it considers the possibility of Japan experiencing mass-migration first, and the lessons from Germany and Singapore will be discussed. In the lessons from Germany and Singapore, the paper will address whether Japan faces the same problems as Germany as a consequence of mass-migration and whether it can and should follow Singapore's path if the Migration-Trilemma cannot be avoided.

2. COMPARATIVE DATA ON IMMIGRATION

In order to research the Migration Trilemma, it is necessary to examine data on migration for each country. First, it is necessary to define the concept of immigrants. Immigrants may be defined as residents with foreign nationality or may also include nationals with an immigration background (people with at least one non-native parent). Japan and Singapore do not allow dual nationality after age 22¹. However, in Germany, this is not the case. So, it is necessary to distinguish two categories of immigrants: when people with an immigrant background are counted as immigrants and not. This paper defines foreign migrants as "immigrants 1" and those with an immigrant background as "immigrants 2".

In Germany, an immigrant background is "a person who has a migration background and if he or she, or at least one of the parents, did not acquire German citizenship through birth" (Statistisches Bundesamt 2019, 4). At the end of 2019, the statistics for Immigrants 1 were 11,228,300, and 19,837,300 for Immigrant 2 (Statistisches Bundesamt, 2005-2019). The country's total population stood at 83,166,711 in 2019. Thus, immigrant 1 accounts for 13.5 % of the total German population and Immigrant 2 for 23.9 %. Both Immigrant 1 and Immigrant 2 have reached the mass-migration threshold.

Singapore's population can be broadly divided into two categories: residents, i.e, the sum of citizens and permanent residents (PR), and non-residents. Immigrants 1 is the sum of PRs and non-residents. In 2019, the number of PRs was 525,300, and the number of non-residents is 1,677,400. Immigrant 1 thus totals 2,202,700 (The Strategy Group in the Prime Minister's Office, 2008-2020). Considering the number of those with immigrant background, between 15,000 and 25,000 new citizenships per year are granted (Ministry of Home Affairs 2019, 16). According to Waipang (2014), naturalised citizens amounted to 64,000 in 2010. Before 2000, there was no active naturalisation in Singapore. Thus, this paper set the average number of naturalisations from 2011

¹ Japan: Nationality Act, Article 14, Section 1., Singapore: Singapore citizenship rules, Article 140, Section 4

to 2019 at 20,000, bringing the total to about 244,000. This is not a precise number because it does not consider the number of deaths and international children. In 2019, the total population was 5,703,569. Immigrant 1 accounts for 38.6 % of the total Singaporean population and Immigrant 2 for 42.9%. Singapore, like Germany, has reached mass-migration thresholds both.

For Japan, Immigrant 1 reached 2,933,137 in the 2019 statistics (Immigration Services Agency of Japan, 2006–2020). According to Korekawa (2018), the naturalised population was estimated to be 462,737, and there were 847,173 international children, in total 1,309,910 as of 2015. Using a similar method by Korekawa (2018, 1), one can estimate the naturalised population and international children by 2019. The naturalised population and international children for 2016–2019 are 32,580 and 74,504 respectively. Therefore, when added to the naturalised population and international children through 2015, the total is 1,416,994. However, the number of deaths and other factors is not considered, so there is some error. Since data for 2018 and 2019 have not yet been released, this paper took the average of 2016 and 2017 and extrapolated for international children. Considering this, it can be estimated that the number of Immigrants 2 is 4,350,131. In 2019, the total population is 126,167,000. Immigrant 1 accounts for 2.3 per cent of the total Japanese population. If immigrant two is included, they account for 3.4 per cent. The proportion of immigrants in Japan is low compared to the other two countries and does not meet the criteria for Hyper-migration. However, Japan may become a mass-migration country after the revised immigration law, as will be discussed in Chapter 5.

Table 1: Percentage of immigrants by country

	Immigrants 1	Immigrants 2
Japan	2.3 %	3.4%
Germany	13.5%	25.5%
Singapore	38.6 %	42.9%

Source: Statistisches Bundesamt 2005-2019; Strategy group 2019; Immigration Services Agency of Japan 2006–2020; author’s calculations.

Next, it is necessary to examine the share of immigrants in each country. Overall, the three countries have one thing in common: the share of Immigrant 1 continues to grow. Furthermore, in Germany and Japan, the trend is towards fewer citizens and more immigrants. However, in

Singapore and Japan, it is difficult to get the original number of nationals because their citizens include those with an immigrant background.

Table 2: Growth/ decrease rates of the population share from 2010 to 2019

	Nationals/ Citizens	Immigrant 1	Immigrant 2
Germany	-12%	+66.3%	+29.1%
Singapore	+8.4%	+19.3%	-
Japan	-1.49%	+37.4%	-

Source: Statistisches Bundesamt 2005-2019, Singapore Department of Statistics 1957–2020, Immigration Services Agency of Japan 2006–2020; author’s calculations.

As discussed previously, substantial immigrant communities from the same nationality may exhibit social and cultural norms different from those of the host society. Therefore, the cultural traits of the largest immigrant communities require examination.

In Germany, the top five countries by nationality account for 40.3 % of the total (Table 3) (Statistisches Bundesamt 2020a). This paper focuses here on Turkey and Syria, both of which have large Muslim populations. Immigrants from Turkey and Syria make up 20 per cent of the resident foreign population, and the number would be even higher if the number of Germans with Turkish backgrounds were included. Germany's Syrian population grew between 2015 and 2016: from 366,556 to 637,845 (Statistisches Bundesamt 2020a). Not all these people are Muslim, but they are culturally different from the other top 5 EU countries.

Singapore is a multi-ethnic country. No details of the country of origin or race are published, as differentiation according to ethnicity is considered a sensitive issue. While official statistics do not reveal the nationality of immigrants, the UN migrant stock 2019 identified the top five immigrant nationalities of Singaporean; Malaysia, China, Indonesia, India and Pakistan (United Nation 2019a). While Indonesia and Pakistan are ethnic minorities, the other three countries are the main constituent ethnic groups of Singaporeans.

In Japan, the top five countries account for 73.9% of the total (Table 3). In China and South Korea, which make up the top 1 and 2, anti-Japanese sentiments are widespread. Looking at trends by nationality, it is clear that Vietnam is making rapid progress. The majority of Vietnamese immigrants are technical interns and international students.

Table 3. The population and share of top 5 nationalities in Germany and Japan

Nationality	The number of foreign residents	The share on total number	Nationality	The number of foreign residents	The share on total number
Turkey	1,472,390	13.1%	China	813,675	27.7%
Poland	862,535	7.7%	Korea	446,364	15.2%
Syria	789,465	7.0%	Vietnam	411,968	14.0%
Romania	748,225	6.7%	Philippine	282,798	9.6%
Italy	646,460	5.8%	Brazil	211,677	7.2%
Total (194 countries + stateless)	11,228,300	40.3% (The share of 5 top countries)	Total (194 countries + stateless)	2,933,137	73.9% (The share of 5 top countries)

Source: Statistisches Bundesamt 2020a; Ministry of Justice 2019; author's calculations.

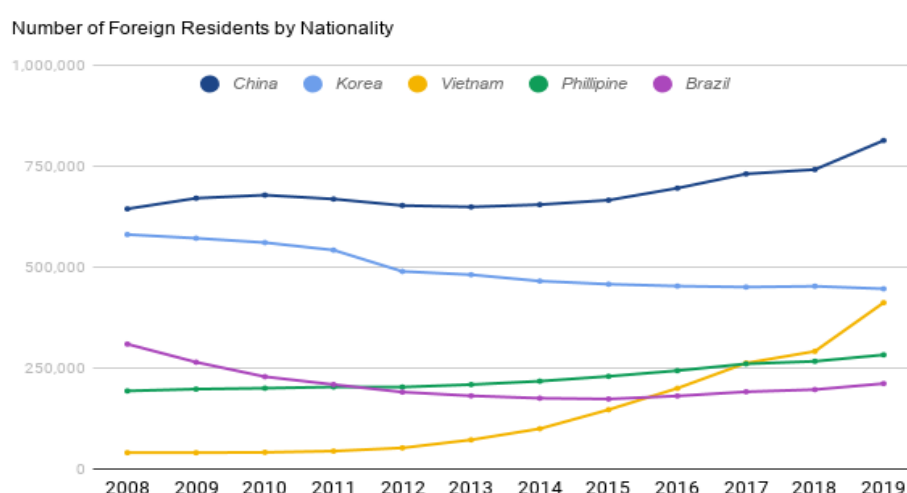


Figure 2. The trend of top 5 nationalities of foreign residents in Japan

Source: Ministry of Justice 2019

The number of refugees and unskilled foreign workers in each country needs to be sorted out because it is necessary for the discussion in the next chapter on whether the dignity of human rights based on democratic values exists and the degree of dependence on foreign workers.

Germany's total number of refugees was 1,146,685, and asylum-seekers was 309,262 in 2019 (UNHCR 2019, 72). The total number of applications was 165,938, refugees recognised was 47,245, with a recognition rate of 38.2% (Federal Office for Migration and Refugees, 2019). The German law² provides for unconditional work permits for people with refugee status. Asylum seekers can apply for a work permit after a three-month waiting period based on a labour market test and a priority review (OECD 2017, 23; Poptcheva & Stuchlik 2015, 15). For unskilled workers in Germany, according to the statistics on foreigners by the status of residence, the number of those who hold a status of residence for economic activities is 258,940 as of 2019, but the number cannot be ascertained because this includes highly qualified foreigners who are not classified as unskilled workers (Statistisches Bundesamt 2020c).

In Singapore, as of 2019, the total number of refugees is 128. In 2019, there were two recognised refugees and no asylum seekers, although the number of applicants has not been disclosed (UNHCR 2019, 75). Application and refugee status information has not been updated since 2014. Work Permits (WP) are considered for unskilled foreign workers. The total number of people holding WP in 2019 was 999,000, which is the highest percentage of non-residents (Ministry of Manpower 2020).

In Japan, the total number of refugees was 1465, and asylum-seekers amounted to 29,123 as of 2019 (UNHCR 2019, 73). In 2019, there were 10,375 applicants, which of them recognised as refugees were 44 and recognised as asylum-seekers was 37 (Ministry of Justice 2020a). Germany has accepted nearly 1073 times as many refugees and asylum seekers as Japan. The status of residence for unskilled workers is granted under the technical intern categories and newly established specific skills. Currently, the number of technical interns is 410,972 (14.0% of foreign residents), and specific skills are 1621 as of 2019 (Ministry of Justice, 2020b).

² Residency Act: section 4a

3. GERMANY: MASS MIGRATION AND DEMOCRACY AT THE COST OF THE NATION STATE

This chapter examines whether (hypothesis 1) Germany's immigration policy, which has experienced mass migration and respect for democratic norms, has indeed weakened the nation-state. Here, this paper illustrates a case study of Germany's prioritisation of democracy, referring to the rights of migrants mentioned in the criteria for democracy in chapter 1. This chapter will examine how the four elements of migrant rights have affected the nation-state.

3.1. Mass-migration

First, it is necessary to understand how mass-migration took place and what kind of immigrants are affecting Germany through mass-migration. It is mainly due to two periods of mass migration: the Gastarbeiter period from the 1950s to the 1970s, and the refugee crisis of 2015 when large numbers of refugees were accepted. During the Gastarbeiter era, joint employment agreements were signed with six countries, including ECC countries and Turkey. This led to a significant increase in the number of foreign workers, especially Turkish immigrants in Germany (Triadafilopoulos & Schönwälder 2006, 7-8). In 2015, Chancellor Merkel accepted a large number of refugees and asylum seekers on humanitarian grounds. However, the 2015 refugee influx was not a migration caused by similar to the Gastarbeiter era, but by the simple open-door policy. In the latter case we are dealing mainly with refugees; i.e. asylum seekers.

3.2. The threat to the German nation-state

3.2.1. The threat to German national identity

This section will argue that the respect for democratic values rights, to settlement and family reunion led to the revision of the nationality law, causing a threat to national identity and social cohesion. It explains how the revision of the nationality law made complication the German nation-

state through the relationship between democracy and foreign workers' mass immigration. Despite the economic downturn and joblessness caused by the global oil crisis, the Gastarbeiter did not choose to return home but settled in Germany with their families (Jacoby 2003, 1586-1588; Nordbruch 2011, 3). The German government had hoped that migrants without jobs would return to their home countries, but the reality turned out to be different (Gesley 2017, 1; Hailbronner 1987, 335). Under these circumstances, more than half of all foreigners stayed in Germany for more than ten years (Farahat and Hailbronner 2020, 3), and the number of their offspring increased through marriage and childbirth. Due to the nationality laws of the time, which were based on *jus sanguinis*, many descendants of immigrants could not acquire German citizenship. Subsequently, the German government decided that it was in the public interest to naturalise foreigners permanently residing in Germany. According to Howard (2008, 44-45), this was due to a combination of the emphasis on European democratic norms, pressure from the international community that the non-integration of migrants into Germany was akin to Nazi-era racism and a growing view that traditional German law was inhumane. Hailbronner, therefore, argued (2006, 36) that the only approach to bridging the contradiction that had arisen between the descendants of migrants and democratic participation was to change the Nationality Act so that German nationality could be conferred on permanent foreign residents based on place of birth, making them subject to German sovereignty in the same way as German citizens. Following these debates, an amendment to the German Citizenship Act in 2000 changed *jus sanguinis* to *jus soli* (Will 2019, 540), which allowed for the acceptance of dual nationality and greatly facilitated naturalisation (Farahat & Hailbronner 2020, 1). The number of German nationals with an immigrant background has thus increased to the present day: the amendment of the Nationality Act in 2000 had a significant impact on the German nation-state on national identity.

The German people's identity, which has changed significantly as a result of this change in the nationality law, is their religious beliefs. As mentioned above, many of those with a German migrant background have Turkish roots. As the number of Turkish immigrants increased, the increase in mosques, Turkish kebab shops and other visible changes to the German Socio-culture. In other words, Turkish Germans have brought a new Muslim culture to Germany. According to the study by Nordbruch (2011, 6) as of 2010, the overwhelming majority of the Muslim population in Germany is of immigrant origin, of which about 45% hold German citizenship. In other words, the transformation of nationality law has accelerated the change of the German demographics. There had initially been no Muslim values in Germany, as the CDU says that Jewish and Christian traditions form Germany's central cultural identity (Scherr 2013, 6). However, the introduction of

interfaith values by immigrants did not pose a threat to German identity. As the evidence, comparing the ISSP 1995 and 2013 national identity surveys, the percentage of respondents who said that religious beliefs are essential to their German identity remains low at 28% and 21% (ISSP 1998: 2015). However, the influence of the power of minority religious views on state policy can be a threat to the nation-state.

It is immigrant organisations that have the most significant power to influence state policy. Immigrant organisations have played an essential role in strengthening the respective communities' national identity, thereby posing an obstacle to their assimilation and their acceptance of German identity. This was made possible by the amendment of the Nationality Law by rights to settlement described above, which broadened the scope of immigrants' right to freedom and blurred the differentiation between immigrants and citizens. For the migrants' right to freedom, the German constitution guarantees basic civil rights such as personal freedom (Art 2), equality before the law (Art 3) and freedom of expression (Art 5) applies to every person residing in Germany, and does not discriminate based on the holder's nationality (Rubio-Marín 2000, 187). However, Freedom of assembly and association (Article 8) is limited to German citizenship. This is where the differentiation between immigrants and citizens became apparent, but the nationality reform enabled Germans with an immigrant background, who had previously been treated as immigrants, to acquire German nationality and participate in the politics of immigrant organisations. The two most influential organisations are the Islamische Gemeinschaft Milli Görüs (IGMG) as the most prominent Turkish-Sunni organisation and the Turkish Islamic Union for Religious Affairs (DITIB) established by the Turkish government (Amelina & Faist 2008, 98; Wunn 2007, 30). IGMG's central goal is to re-establish an Islamic-based Turkish social order in Germany (Amelina & Faist 2008, 98), and their most significant political engagement is the annual Mass gathering (Amelina & Faist 2008, 98-99). This is where the identity and cohesion of the Turkish immigrants can be strengthened.

In contrast to IGMG, DITIB is Germany's largest Muslim umbrella organisation and an immigrant organisation that has influenced German society religiously with its involvement with 870 mosque associations (Amelina & Faist 2008, 95). The organisation was created to prevent Turkish immigrants from losing their loyalty to Turkey (Oner 2014, 82; Wang and Wang 2016, 108). The work done by these immigrant organisations is reflected not only in the growing number of Islamic societies and mosques but also in the many debates about how to integrate Islamic religious practices and beliefs into formal institutional settings such as schools, workplaces and general government (Nordbruch 2011, 6). What both migrant organisations have in common is that they

want to ensure that Turkish Islam's culture and identity are not lost through German assimilation. For this reason, the German government warned that the Muslim education provided by the IGMG was a threat to German democracy as it interfered with its assimilation policy (Wang and Wang 2016, 111; Yükleven & Yurdakul 2011, 73) it views IGMG as an organisation with an extremist ideology (Federal Ministry of the Interior, Building and Community 2018, 26). The DITIB has also expressed concern that the integration promoted by the government is, in effect, an aspect of the government's attempt to culturally assimilate migrants into German society and has called for a different kind of integration (Sekino 2016, 11). Therefore, it is feared that the growing power of the Turkish Germans and their opponents would lead to an increasing social division in Germany. This can be a possible threat to the German national identity.

3.2.2. The threat to German national security and public order

This section will illustrate how threats to Germany's national security and public order have been caused by the impact of social and economic rights as indicators of migrants' rights. The mass-migration element added here is the second phase of mass migration, the refugee influx of 2015. Germany's open-border policy is in line with democratic liberal values. This open-border policy adheres to the democratic values of individual liberty, equality and dignity. According to World Value Survey (2020), 86.5% of Germans said they favoured providing asylum to refugees, the highest percentage of any country surveyed. According to democratic values, welfare benefits and public services were also provided to migrants, and it can be said that the social rights of migrants were also applied to refugees. The rights of refugees and asylum seekers are fully covered by Article 16a Basic Law, the Asylum Procedure Acceleration Act, the Residence Act, the Asylum Act and the Asylum-seekers' Benefits Act (Poptcheva & Stuchlik 2015, 15). Refugees are granted a work permit and a three-year residence permit, which is renewable for a further three years, followed by an unrestricted residence permit and, after seven years, a permanent residence permit (Article 26 of the Residence Act). Asylum seekers receive financial support and housing, including food and medical expenses as basic needs, and financial support of €135 per month is given in the reception centres, and €354 outside of the centres (Article 3 of Asylum Benefits Act) (Poptcheva & Stuchlik 2015, 16). This is only about 70 euros different from the average social security recipient (Dhawan 2018, 5). Providing this substantial support to a large number of refugees has a significant impact on Germany's finances. Social welfare spending on asylum seekers alone totaled €5.3 billion in 2015 (Statistisches Bundesamt 2016) and €4.4 billion in 2016 (Funk and Scheffer 2017). €21.7 billion on refugees-related in 2016 represent more than 6.8% of the annual budget of €316.9 billion (Federal Ministry of Finance 2016). Compared to the US in 2016, which spent about

\$1.8 billion (0.05% of the annual budget \$3,268 billion) (O'Brien & Raley 2018: U.S. Government publishing office, 2015), Germany spends a relatively large sum on refugees.

Despite the protection of social rights for refugees and asylum seekers, there was a differentiation between citizens and migrants concerning economic rights. This made it challenging to integrate refugees and asylum seekers into the labour market, which impacted Germany's national security and public order. Although Refugees and some asylum seekers, except people from safe countries of origin (Konle-Seidl 2017, 5), are granted work permits under the law (after a three-month waiting period for asylum seekers), they face strict labour market regulations (Giesing, Battisti, & Laurentsyeva 2018, 4). After a priority review, which investigates whether there is a preference for the job among Germans and EU citizens, and a labour market survey, which tests whether the employment of foreigners will harm the market, those who are granted permission are given a job (Poptcheva & Stuchlik 2015, 15). Freedman, Owens, and Bohn (2018, 135) found that a limited labour market affects immigrants' behaviour so as to increase crimes. Does Freeman et al. (2018)'s argument apply to the German situation? In 2015, the year of the massive influx of refugees, there were 911,864 non-German suspects, an increase of 47.7 per cent over the previous year and accounting for 38.5 per cent of the total number of suspects (Federal Criminal Police Office 2016, 7). The increase in the number of refugees and asylum seekers in 2015 and 2016 resulted in the average unemployment rate for non-Germans rising from 13.95 per cent in 2013 to 18.22 per cent in 2016 (Gehrsitz & Ungerer 2016, 18). The unemployment rate of non-German immigrants in 2019 was reduced to 12.9 per cent when immigrants' crime rate fell in parallel to 6.22 per cent (Koptyug 2020). This shows that the crime rate of immigrants is similarly linked to their unemployment rate. Priority reviews only apply to asylum seekers for 15 months (Poptcheva & Stuchlik 2015, 15); it can be argued that this is because a large number of refugees and asylum seekers who arrived in 2015 and 2016 had easier access to the labour market as the period of application of the priority review expired, resulting in lower unemployment and lower crime rates. The study of Gehrsitz & Unger (2016, 19) finds that there is a relationship between the mass migration and the number of non-German suspects, suggesting that a one standard deviation increase in refugee quotas led to an increase in the number of incidents involving non-German suspects of around 71 in 2016, which they argue is a significant increase. This was the peak at this time, and by 2019 it has decreased to 6.22 per cent. Thus, the crime rate due to immigrants increased at the beginning of accepting mass refugees.

It found it difficult to argue that the threat to the nation-state from the point of view of national security and public order was fully established by the migration trilemma, because migrants were not given sufficient economic rights. However, policies that adhere to mass migration's liberal democratic values have had consequences for national security and public order.

3.2.3. The threat to German social cohesion

Finally, this section will explain how the threat to Germany's national identity and national security and public order have led to growing public concern and threats to social cohesion. The change of German identity by the Muslim community and the backlash against the harmful effects of the liberal refugee policy accelerated nationalism. In particular, those with an immigrant background have challenged interfaith prejudice, discrimination and social inequality (Moffitt & Juang 2019, 657; Scherr 2014, 5-10). There is a growing division between liberal and nationalist views within German society, which is reflected in the election results. The study of Mader, Pesthy, and Schoen (2020, 3) argued that Germans with a strong national identity are positively associated with right-wing parties and negatively associated with left-wing parties, while those with a liberal identity have precisely the opposite result. This explains the rise of the *Alternative für Deutschland* (AfD) as an increasing group of German nationalism. The AfD, which was founded in late 2012 and advocated EU scepticism and nationalism, had gained much support in Germany since 2015 when it spoke out about the threat to Germany from mass immigration and Islam's impact on Germany (Lees 2018, 305). Besides, two serious migrant crime incidents in 2015 and 2016 accelerated Germans' fear of migrants – a sexual assault on New Year's Eve and an attack by a truck on a Christmas market in Berlin – caused great anxiety among the public. In the 2017 parliamentary elections, the AfD won 12.6% of the vote, making it the third most powerful political force in parliament (Lees 2018, 295). This is the first time a far-right party has won a seat in parliament since the post-war German party was deposed in the 1950s (Lees 2018, 295). As well as the growing power of the new right-wing extreme parties, massive dissatisfaction with Germany's refugee policy has led to demands that German Chancellor Merkel resign (Arlt, Schumann, & Wolling 2020, 2).

There are apparent regional differences in opposition to mass migration. The AfD won more votes (21.9%) in the territory of the former German Democratic Republic (GDR) than the FRG (10.7%) (Weisskircher 2020, 614). This suggests that East Germany's tendency towards economic and cultural homogeneity is reflected in its anti-immigration stance (Weisskircher 2020, 619). In

addition to the low level of AfD support in West Germany, the fact that the areas with a large number of Germans with an immigrant background, Baden-Württemberg, Bayern and Nordrhein-Westfalen, were under the jurisdiction of Western Germany, can explain the liberal tendencies of West Germany by the regional variable as well (Statistisches Bundesamt 2020b). The 2017 election results showed that Turkish Germans voted more left leaning, with 35%, 16% and 13% for the SPD, the Left and the Greens (Goerres, Spies, & Mayer 2018, 1). Therefore, it can be said that the threat of social cohesion in Germany was caused by prioritising democratic values to mass migration.

In sum, the German case illustrates the impact of mass-migration on the nation-state in three ways. Firstly, due to the mass-migration, public opinion in favour of immigrants' rights increased, the amendment of the nationality law (contributing to the right to settlement) introduced Muslim values of Turkish immigrants into German society, and citizenship widened the scope of the right to freedom. As a result, immigrant organisations can intervene politically, hindering Germany's assimilation policy and affecting national identity. Secondly, liberal democratic values have allowed a massive influx of refugees, which has resulted in a rise in the crime rate and a deterioration of public safety in Germany. Furthermore, the growing anxiety about these threats has led to a social divide between nationalists and liberals in Germany. Therefore, hypothesis 1: the preference for democratic values in mass migration Germany leads to a threat to the nation-state, is valid.

4. SINGAPORE: MASS MIGRATION AND DEFENCE OF THE NATION-STATE AT THE COST OF DEMOCRACY

Singapore chose the opposite direction of Germany. It responded to mass immigration by curtailing democracy through introducing an immigration policy that prioritises the defensive aspects of Nation-States. The case of Singapore will be examined to see whether the sacrifice of democracy was necessary to protect the nation-state.

4.1. Mass-migration

Singapore has historically relied heavily on foreign migrant workers for high-skilled and low-skilled jobs since the Lee Kuan Yew regime (Morita 2016, 3). As a result of such policies, immigrants' share in the total population is estimated at over 38.6% for Immigrant 1 alone and over 42.9% if Immigrant 2 is included. This is considerably higher than the ratio in Germany. Therefore, the criteria for mass-migration are met.

4.2. Defence of the Singaporean nation-state

4.2.1. Defence of Singaporean national identity and social cohesion

First, this section looks at the extent to which Singapore's democracy and democratic values are reflected in society. Singapore is one of the most enduring electoral dictatorships in Southeast Asia, ruled by the People's Action Party (PAP) (Ng 2018, 4). The PAP maintains a one-party dictatorship through electoral control and occupies a parliamentary supermajority that prevents the opposition from gaining more than a few seats (Tan 2013, 633-635). According to Freedom House (2020), Singapore is partly free, with a 50/100 mark for freedom. The reason for a non-democratic regime in Singapore is related to the historical experience of heightened tensions between the Chinese and Malay communities when Singapore had independence. The issue of ethnicity was

one of the factors that led to the secession from Malaysia, as the stabilisation of an ethnically harmonious society was one of Singapore's top priorities in nation-building alongside economic independence (Ichioka 2016, 35). Singapore has had a history of ethnic conflict even before its independence. A strictly disciplined dictatorship was established to stabilise the multicultural nation, made up of several ethnic groups (Vasu et al. 2014, 95). Therefore, the Singapore government emphasised the lack of national identity to justify the PAP's dictatorship (Brown 2003, 91). As an alternative to Singapore's national identity, the government firmly created a Singaporean society (Ortmann 2009, 23). Hong and Lugg's (2016, 27) argue that Singapore's most vital national identity is its success record in various fields, including economic development. This success has been made possible by Singapore's two principles of multiculturalism and meritocracy (Hong and Lugg's 2016, 31). Singapore is a multicultural country where people of different ethnicities: Chinese, Malays, Indians and others coexist. In order to achieve multicultural coexistence, a meritocratic society has been formed to avoid ethnic privilege (Hong and Lugg's 2016, 31). To achieve multiculturalism and meritocracy, which are the core elements of Singapore's national identity, Singapore needed substantial government control. Full multi-party democracy was considered incompatible with that. Against this background, Singapore has tried to maintain its multicultural identity by strictly regulating and restricting the freedom of immigration to ensure that multiculturalism is not hindered by the growing assertiveness of immigrants with different identities.

Article 14 of the Republic of Singapore's Constitution guarantees to Singaporean citizens the rights to freedom of speech and expression, peaceful assembly without arms, and association. Although presented in the constitution, there are restrictions on where they can be expressed, and the only place where Singaporeans can hold public meetings without government permission is at Speakers' Corner in the park (Human Rights Watch 2017, 4). Art 14 of the Constitution refers to "Singapore citizens", and not immigrants (SMU Apolitical 2016, 31). Restrictions on civil liberties are set in place, and even stricter restrictions on immigrants' liberties are set in place. Furthermore, the terrorist attacks in Europe led to further tightening of the rules at Speakers' Corner in 2016 (Human Rights Watch 2017, 4). Under the new rules, foreign observers are considered participants even if they observe a protest, and are at risk of criminal prosecution, as are rally organisers (Human Rights Watch 2017, 4). The number of people protesting against the government under these strict rules is not zero. However, foreigners who break the rules are forced to return home. In 2012, 29 Chinese bus drivers were arrested by Singapore authorities and deported to China after they went

on a strike to protest discriminatory pay (China Daily Information Co, 2012). The tendency to protect National identity has been also reflected in immigrant organisations and these are only perceived as cultural positions. Even though political intervention by immigrant minorities is not possible, Singapore's respect for multiculturalism makes it tolerant of religious and cultural rituals and festivals. Individuals also enjoy the freedom to uphold interfaith and intercultural values (Act 15 of the Constitution of Singapore).

Therefore, it is evident that the restriction of immigrants' freedom rights protects multiculturalism, which is the core of Singapore's identity. It is believed that immigrants with different identities, who are not part of Singapore's diversity, risk threatening Singapore's national identity when they speak out. By excluding the right to freedom for immigrants, Singapore has maintained its diversity as a national identity, even in a country with a high immigration rate of 40%.

4.2.2. Defence of Singaporean public order

Singapore is known to be a safe and secure country. According to "Countries/Areas with Highest Law and Order Index Scores" survey by Gallup (2019), Singapore ranked first out of 147 countries. The survey is based on interviews with the public about their trust in the police and the country's security. The results indicate that Singapore's is secure. The crime rate by immigrants in Singapore was an average of 4,190 crimes per year, according to data from 2011-2018 (Ministry of Home Affairs, 2020). Crimes committed by permanent residents are indistinguishable as they are counted together with Singapore citizens. However, the crime rate is infinitesimally low, averaging 0.26% when considering the number of crimes committed by non-residents as a percentage of the total number of non-residents (Figure 3). Compared to the immigrants' crime rate in Germany, immigrants' crime rate in Singapore is by far lower. The low crime rate in Singapore as a whole, and not just crime committed by immigrants, is mostly due to the Miscellaneous Offences Act and the Sedition Act's restrictions. The Miscellaneous Act contains detailed rules of conduct in Singapore and fines for offenders. Offences such as dog control (Act 8.9) and spitting on the roadside (Act 13), which would not be criminal offences outside Singapore, are criminal offences and fines can be imposed. The Sedition Act prohibits, within the scope of the law, the incitement of grievances (Act 3 (1) (d)) and the promotion of ill will or hostility between different races or classes (e) among citizens or residents of Singapore. However, some argue that this infringes on freedom of speech (Neo 2011, 352). A powerful tool for reinforcing public morality, Singapore employs a successful approach to preventing crime before it happens (Reynolds 2017, 31). The

Singapore government justifies the regulation of freedom by arguing that individual rights and freedoms are only meaningful in a stable social order and that the absence of crime means more freedom for all (Human Rights Watch 2017, 30). Therefore, Singapore's strict controls and undemocratic decisions are a deterrent that helps explain the low crime rate.

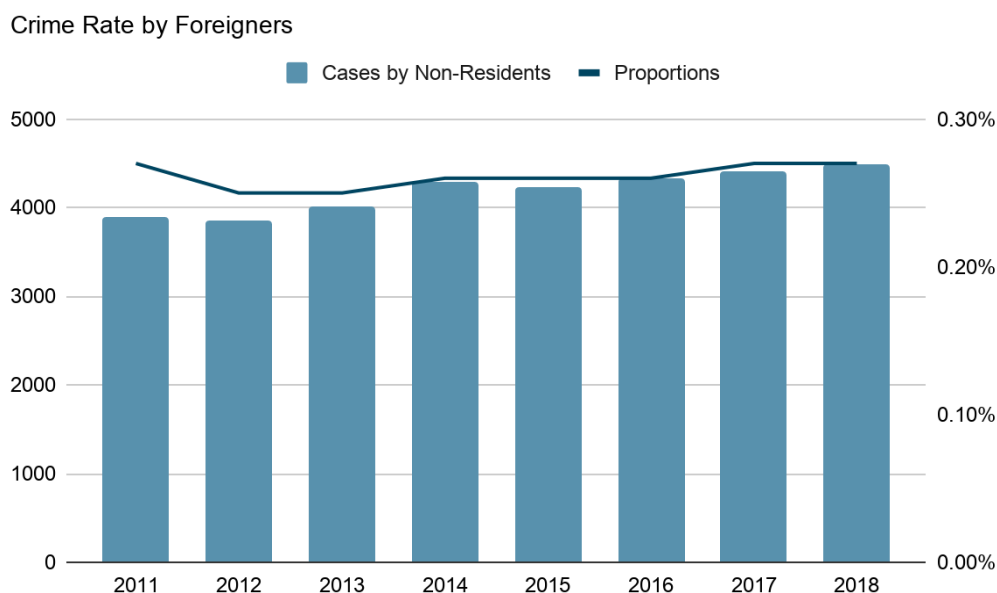


Figure 3. Crime Rates by Foreigners in Singapore

Source: Ministry of Home Affairs 2020

4.2.3. Defence of Singaporean national security

Finally, it is examined how Singapore's human rights-violating domestic foreign workers' treatment ultimately affects Singapore's nation-state. It is found that there is an element of defence of national security. Similarly, since Singapore's attitude towards accepting refugees has been to avoid the risk of national security, this section will discuss how the rights of immigrants have had to be sacrificed to protect national security.

Domestic workers, who are regarded as the lowest level of foreign workers, are not covered by the Employment of Foreign Manpower Act (EFMA). The EFMA only provides guidelines on rest and well-being for domestic workers, and employers are not subject to penalties for violating the Employment Act for domestic workers (Ministry of Manpower Singapore, 2012). The unprotected nature of this legislation is a cause of human rights abuses by domestic workers. According to a study by the Ecosoc Rights Institute, at least two Indonesian domestic workers a day are fleeing

their employers and seeking assistance from Indonesian government shelters. Furthermore, between 1999 and 2005, at least 147 labour migrants, 122 of whom were Indonesian citizens, died due to falling or jumping from their employers' apartments (Human Rights Watch 2005, 38). This includes both workplace accidents due to unsafe window cleaning and suicides due to inhumane working conditions. Many people suffer depression and other psychological damage in harsh working conditions (Laursen 2010, 55). More than half (54.4%) of domestic workers work more than 16 hours a day, and 11.5% work more than 19 hours a day (Laursen 2010, 56).

Furthermore, government restrictions are also implicated in individual life choices. Foreign workers need government permission to marry a Singaporean (Ministry of Foreign Affairs, n.d.), and if a foreign worker becomes pregnant, she cannot give birth in Singapore and must either have an abortion or leave Singapore (Laursen 2010, 54). This harsh treatment of domestic foreign workers occurs because the Singapore's government considers them to be a criminal risk. The state-run newspaper, *The Straits Times*, reports how foreign domestic workers are at high risk of extremism (Bei Yi 2017; Lai 2019; Tai 2019). It can be said that the country of origin of foreign domestic workers has a significant impact. Most foreign domestic workers from Indonesia and the Philippines (Wessels 2015, 6) are active in Islamic extremism.

Furthermore, the Ministry of Home Affairs and the Ministry of Manpower have drawn up recommendations to warn employers of foreign domestic workers and how to recognise extremism (*The Straits Times* 2017). In this case, it can be said that there is a perceived threat of Islamic extremism from foreign domestic workers, and they are constructed as potential criminals. By making the risk of criminalisation of domestic workers, who make up a large proportion of the foreign workforce, a self-imposed responsibility between employer and worker, the policy is designed to ensure that the risk is not reflected in Singapore's national interest.

A similar example of sacrificing the rights of immigrants for the risk of national security is Singapore's attitude to refugees and asylum seekers. It is clear from chapter 2, that Singapore has not been proactive in accepting refugees. Singapore's refugee intake numbers are meagre: only two asylum applications were accepted in 2019, bringing the total number of refugees and asylum seekers together to just 128 (UNHCR 2019, 73: 81). This closed-door refugee policy results from the bitter experiences of the Indochinese refugees (Lewis 2015). Singapore has provided a stopover for refugees awaiting recognition in the past but has experienced strong resistance to repatriation by refugees denied recognition, leading to refugee suicides and hunger strike protests (Lewis

2015). As a result, Singapore has announced that refugees will no longer be allowed to enter the country, even if a third country promises to take them back (Lewis 2015). In other words, the experience can be interpreted to mean that Singapore is more concerned not to run the risk of immigrants, causing a deterioration in domestic security than humanitarian values.

In the case of Singapore, it was found that there were justified reasons to limit immigrants' freedom and rights to maintain the four elements of the nation-state. Even in an environment of high immigration and interculturalism, restrictions on freedoms have helped to create a unified identity, and strict rules have helped to keep crime rates low. The defence of national security understands the risks posed by mass immigration and imposes restrictions on migrants' rights to minimise them. Therefore, hypothesis 2 is reasonable, i.e. Singapore's preference for a nation-state in a state of mass-migration has led to a lack of democracy.

5. LESSON FOR JAPAN

Chapter 3 showed that mass-migration in the German context had created a threat to the nation-state, while it was argued in chapter 4 that to prevent this outcome, Singapore, also characterised by mass-migration, decided to curtail democratic rights. This chapter enquires whether these two cases hold any lessons for the future direction of immigration policy in Japan. As the number of immigrants is set to increase substantially, will this also necessarily provoke a threat to the nation-state, as in Germany, and if so, would that suggest the need for a curtailment of democratic rights of immigrants?

5.1. Mass-migration

The first point to consider is whether Japan is likely to be confronted with mass-migration. At present, Japan's share of immigrants in the population is 3.4%, far lower than that of the other two countries. Thus, it needs to consider whether mass-migration is likely to occur in Japanese society. But what will the effects of the new immigration law be? The immigration Act's main change is the creation of a new residency status, "specific skills," which allows foreigners with certain skills to work in non-specialised fields. The amendment is similar to the German *Gastarbeiter* period in its policy of accepting low-skilled migrants when needed. The 1990 amendment to the Immigration Act, which eased permanent visas for *Nikkei* (descendants of Japanese nationals), began to increase foreign low-skilled labourers working in Japan. However, the central turning point is the acceptance of foreign low-skilled workers without Japanese ancestry. Specific skill can be divided into Specific Skill 1 (SS1) and Specific Skill 2 (SS2). In the case of SS1, those who have passed their skill level and Japanese language test (At least N4 level) will be granted a work permit for a total of up to five years. However, those who have completed three years of technical internships are exempt from this test. There is a route for technical interns to extend the duration of their stay, so the specific skills system is also a system that encompasses the technical intern program (Mochizuki 2019, 197). Three restrictions characterise the SS1: only 14 industries can be

established as host institutions, and within these, the maximum number of people accepted is set by the industry.

The total number of prospective applicants is 345,000 over five years (Ministry of Justice 2019). This number represents 11% of Immigrant 1, and calculations show that this is a long-term plan with an expected increase of 2% per year. SS1 holders are not allowed to be accompanied by family members, so the rise is unlikely to spread from there. However, these restrictions are relaxed for those with SS2 status, who can bring their families and extend their stay. Details of the transition from SS1 to SS2 have yet to be finalised, as the pilot for SS2 will begin in 2021.

Furthermore, there are currently only two areas of SS2 that are covered: construction and shipbuilding/marine industry. Therefore, the route to SS2 may be a narrow one. In principle, the conditions for obtaining permanent residence in Japan are that the person must have been in the country for at least ten years and must have worked for at least five years, but the law does not cover five years of technical training and five years of Special Skills 1. At the moment, restrictions on low-skilled workers are strictly enforced. Key points include limits on the number of people accepted, the types of work they can do and their stay. This is different from the German immigration policy. Doing so appears to be an excellent way to prevent immigrants from staying for long periods in Japan. Hence, it is too early to classify Japanese as a case of mass-migration, as in Germany and Singapore, because the new immigration law recognises that foreign workers are supposed to return home.

However, in the longer term, things may develop differently. In particular, the demand for labour arising from Small and Medium-sized Enterprises (SMEs) requires low-skilled workers. With the projected population decline, dependence on foreign labour will be increasing every year. While foreign workers accounted for one in 97 of all workers in 2010, one in 41 was a foreign worker in 2019.³ Therefore, although immigrants currently make up a much smaller proportion of Japan's population than in Germany or Singapore, the decline in the Japanese working-age population, implies an increasing need for reliance on foreign labour. Future projections of Japan's population based on mid-life birth estimate that the working-age population (15-65 years) is expected to fall below 50 million 45.29 million in 2065 (National Institute of Population and Social Security Research 2017). Besides, according to Korekawa's (2018, 23-24) study, the Immigrant 2

³ Dependence on foreign workers was calculated using the number of foreign workers in the foreign employment situation (Ministry of Health, Labour and Welfare, 2010:2020b) and the number of all workers, including foreigners, in the Labour Force Survey (Ministry of Internal Affairs and Communications Statistics Bureau, 2010-2019).

population is expected to increase to 10.76 million in 2065, accounting for 12.2% of the total population. When the number of foreign nationals entering Japan, the age structure of foreign nationals, Japanese nationals entering Japan, and children born to foreign nationals are all taken into account, the outcome is similar to the current percentage of immigrants in Germany. In the long term, the probability of Japan becoming a mass-migration country hence is high.

5.2. Lessons from Germany and Singapore

Chapter 3 argued that as a result of mass-migration and respect for immigrants' rights, the four elements of the German nation-state – national identity, social cohesion, national security and public order – are threatened. This section examines whether Japan's future mass-migration may pose a threat to the nation-state's four elements in the same way as in Germany. Moreover, if there is a potential threat, it will be examined whether there is a need to sacrifice the rights of immigrants as a defence against threats to the nation-state, as in the case of Singapore.

5.2.1. National identity

Japanese identity firmly rests on the myth of ethnic homogeneity and uniqueness (Takenoshita, 2016, 95). This is manifested i.g. in the standard labelling of naturalised citizens as *zainichi* (在日) – (foreigners living in Japan) rather than as – Japanese, such as Turkish Germans or Chinese Singaporeans (Takahashi 2018, 564). This shows that Japanese people are reluctant to refer to people with foreign roots as Japanese. These phenomena are consistent with Befu's (2001) assertion that Japanese national identity is based on *ius sanguinis*. Takahashi's (2018, 581) employing the methods of Heath & Tilly (2005) demonstrated Japanese identity to be defined in ethnocultural terms and not as a civic identity. In other words, this means Japaneseness is not created by language, culture or political knowledge, but by ethnicity. The WVS data (2020) also proves that the Japanese have a strong sense of homogeneous values. In terms of trust in other nationalities, 44.6% of the Japanese responded that they did not trust them, while only 15.9% responded that they trusted them. It can hence be inferred that the Japanese are prone to creating a distance between them and foreigners. Japanese identity thus differs from German national identity. In other words, even if an immigrant (with an immigrant background) has mastered the Japanese language to the level of fluency, or has acquired knowledge of Japanese culture and politics, it is difficult to be recognised as Japanese if one does not have Japanese ancestry. Even second- and third-generation immigrants, who were born and raised in Japan and know the

Japanese language and culture, often use Japanese names to hide their Korean roots to avoid discrimination and prejudice (Aoki 2012, 385-386; Lee 1999, 51). The author's own childhood experience of seeing classmates who had Japanese names and were treated as Japanese become targets of discrimination when it became known that they had Korean roots. This shows that Japanese roots have a significant impact on Japanese identity.

Two of the most prominent policies protecting Japan's ethnic identity are the Nationality Law and the Special Permanent Resident. Unlike Germany, which changed its nationality law from *jus sanguinis* to *jus soli*, Japan has maintained its adoption of the *jus sanguinis* nationality law to make it difficult for the descendants of immigrants to acquire a nationality. Instead, they grant special permanent residents to immigrants. Under colonial rule, *zainichi* lost their Japanese nationality and were given a new special permanent resident status, classifying them as foreigners (Kalicki, Murakami, & Fraser 2013, 211). When the San Francisco Peace Treaty came into force, foreigners who had been recognised as Japanese in the former Japanese Empire were reclassified as mere aliens with no connection to that country (Kalicki et al. 2013, 217). As a result, nationality became a large part of the boundary between Japanese citizens and other ethnic groups (Kashiwazaki 2013, 42).

Furthermore, those with special permanent resident status and their descendants are similar to Turkish immigrants in Germany before, as they were born and raised in Japan but were recognised as foreigners. Compared to Germany at that time, Japan is less subject to international criticism because it has a strong national identity and does not belong to a union of democratic values like the EU. Another factor may be that the Japanese have less remorse for the colonial period than the Germans for the Nazi era, which was based on the ideas of the German racial superiority and uniqueness. Therefore, it can be argued that Japan's naturalisation policy is also aimed at protecting national identity based on a discourse that equates nationality with ethnicity (Tai 2009, 613).

Since the identity of the Japanese is defined important in terms of the bloodline, it becomes impossible for immigrants to assimilate into Japanese society. Therefore, the adoption of a nationality law based on *jus soli* would pose a threat to Japanese identity if there is a massive influx of immigrants. It will be suggested that the right to settlement as one of the migrant rights cannot escape being sacrificed to protect against threats to Japanese identity.

5.2.2. Social cohesion

The study found that it was the presence of immigrant organisations that had a threatening impact on German national identity. Therefore, it needs to be examined how Japanese immigrant organisations influence Japanese society and whether they can be a threat. Japan also has immigrant organisations that are as powerful as in Germany. Korean immigrants have formed two immigrant associations: *Minindan* (Groups with Korean roots in Japan) and *Chongryon* (Groups with North Korean roots in Japan). The former Mindan has been extraordinarily active in advocating suffrage for special permanent residents (Sharpe 2014, 136; Shipper 2010, 57). Among their main activities, they have been active in submitting parliamentary opinions, organising large demonstrations and supporting politicians favouring foreign political participation (Mindan 2019, 5: 14). In addition to domestic actions, Mindan has also acted in the international arena. As a result of Mindan's call for permanent foreign residents to vote in local elections, the UN human rights body has recommended to the Japanese government that foreigners be allowed to participate in shaping public opinion (Mindan 2019, 18-19). However, article 15 of the Japanese constitution requires Japanese citizenship to participate in elections and clearly states that foreigners living in Japan do not have the right to vote in mayoral, gubernatorial, local or national elections (Kalicki 2008, 274). Although the constitution's scope is debatable, granting immigrants the right to vote would also raise the issue of constitutional reform.

What are the possible threats if the demands of immigrant organisations are accepted, and special permanent residents are granted suffrage? A survey of political parties on the issue of immigration conducted by the Solidarity Network for Migrants in Japan (SMJ) (Table 4) shows that the main opposition parties are more likely to argue that the rights of migrants should be prioritised, while the Liberal Democratic Party (LDP) is consistently conservative in its responses. Formed three months before the elections, the *Reiwa Shinsengumi* (*Reiwa*) is a populist (but left-wing populist) group that has an increasing impact on Japanese society. Its liberal policies have been so successful that it had won 4.6% of the total vote within three months of its formation and two seats in the Upper House. On the other hand, the anti-immigration, far-right Japan First Party, still has no members in the Diet (The House of Representative n.d) and received 2.92% of the vote when it ran for Governor of Tokyo, considerably lower than the 10.72% of support for the *Reiwa* (Tokyo Metropolitan Government Election Commission 2020). At present, the power of the anti-immigration opposition parties is not as strong as in Germany. Although the conservative LDP is currently in power, the presence of significant numbers of immigrants and their different identities

from the Japanese could affect the election outcome. The German finding that those with immigrant backgrounds tend to be more liberal and vote for left-leaning parties may also apply to Japan. Therefore, it could be argued that as left-wing parties gain strength, right-wing parties could rise, and in doing so could become a threat to social cohesion but so far there are no signs of social division as in Germany.

Table 4. Political party survey on immigration policy.

	Family member of Special Skill 1	Abolition of the Technical Intern Program	Local voting rights for permanent foreigners	Laws against racial discrimination	Enactment of Basic immigration law	Ratification of the convention on the rights of migrant workers
LDP	×	×	×	×	×	×
CDP	△	○	△	○	△	○
DPFP	△	△	△	△	△	△
JCP	○	○	○	○	○	○
SDP	○	○	○	○	○	○
Reiwa	○/×	○	○	○	○/×	○

LDP: Liberal Democratic Party, CDP: The Constitutional Democratic Party of Japan, DPFP: Democratic Party For the People, JCP: Japanese Communist Party, SDP: Social Democratic Party, Reiwa: Reiwa Shinsengumi

Source: SMJ 2019

5.2.3. National security

The activities of immigrant organisations in Japan could also pose a threat to national security. This is due to the nature of the relationship between Japan and the original countries of migrants. In Germany, the citizens with immigrant backgrounds are predominantly of Turkish origin, and foreigners with the right to vote for local government are EU citizens, whereas in Japan they come from China and Korea. The two countries are neighbours and have a tense relationship. Immigrant organisations have strong links with the motherland, and evidence can be found on the website of

the *Mindanao* that its operating costs are subsidised by the Korean government (Mindanao-Osaka, n.d.). In this context, the *Nippon Kaigi* (Japan Conference)⁴ Concerned that the right of permanent foreign residents to vote could be used by foreign governments and poses a national security risk (Higuchi 2011, 68). In response to the theory that foreign suffrage poses a security risk, Kowata (2010, 19) argues that the security issue is unrealistic because descendants have an attachment to their place of birth and grow up (Nakahara 2003, 86-87), and that needlessly antagonising foreigners is a violation of human rights. However, in the study of possible threats to national identity, migrants cannot be assimilated into Japanese society, but have their own identity. This means that even if they are born and raised in Japan, they may still have links to immigrant communities that could influence their identity and be manipulated to suit foreign governments' wishes.

To avoid the threat to social cohesion and national security, Singapore's policy decision was to sacrifice the rights of migrants to eliminate the risk. Therefore, Japan's way to avoid the possibility of a threat, as Singapore did, would be to restrict the right to settlement and freedom of immigration. Although Germany did not grant freedom of assembly and association to migrants, the amendment of the Nationality Act gave migrants (those with an immigrant background) freedom of assembly and association, which posed a threat to German society. In other words, restrictions on the right to settlement for migrants, an amendment to the Nationality Act, will be inevitable to counter the threat. The debate is complicated by the fact that Japan denies migrants the right to participate in national and local government, while at the same time allowing them freedom of speech, expression, assembly and association. The freedom of assembly, association, and expression enshrined in Article 21 of Japan's Constitution applies to all citizens and does not specify the need for Japanese nationality. Differentiating between Japanese citizens and immigrants here would help reduce immigrants' claims to suffrage and avoid the risk of threats to social cohesion. It would have been possible to avoid Singapore's threat if restrictions on the freedom of assembly and association had been imposed on special permanent residents when they renounced their Japanese nationality. However, this is not practically possible in modern Japanese society, where there are already several immigrant organisations. Thus, the theory of migration

⁴ The Nippon Kaigi was founded in 1997 and is a very influential group in Japanese politics, with Prime Minister Shinzo Abe and 80% of his cabinet members and a large number of conservative Diet members (Toyoda & Chapman 2019 2).

trilemma concludes that the right to the settlement must be sacrificed to counter the threat posed by migrant organisations.

This would then lead to a debate on the amendment of the Nationality Act, which, as mentioned above, is unlikely to lead to change in the rights of immigrants. However, the granting of the right of suffrage to foreigners is incidental to constitutional reform. The question of immigrant suffrage is, therefore, likely to be the subject of further debate.

5.2.4. Public order

In Germany, there was a trend towards a deterioration of public order due to foreigners' crimes, while this was not the case in Singapore. To what extent is Japan likely to be confronted with the German problem? In 2015, foreigners' crime rate (excluding permanent residents and special permanent residents) was 1% and remained very low in 2019 at 1.15% (National Police Agency, 2020 82). However, the number of crimes committed by the Vietnamese is increasing every year. Looking at the number of arrests by residence status, technical interns, short-term visitors, and students account for more than 50% of the total (National Police Agency 2020, 87). Therefore, the focus will be on the increase of crimes committed by technical interns, mostly Vietnamese which is expected to increase in the future. In Germany, this paper speculated that the failure to integrate refugees and asylum seekers into the labour market might have led to increased crime rates. However, unlike Germany's acceptance of refugees, Japan's acceptance of immigrants to fill the shortage of human resources through foreign workers guarantees the integration of foreigners into the labour market. Evidence of this is that the effective job offer ratio in Japan is 1.55 in 2019 (Ministry of Health, Labour and Welfare 2020c), which means that immigrants are unlikely to contribute to increased crime rates for the same reasons as in Germany. Another difference is the influx of low-skilled workers with some preparation (language and skills) for employment in Japan, unlike the German refugees many of whom arrived without employment skills.

So, what is the reason for the increase in crime among Vietnamese? It could be argued that this is due to economic pressure deriving from the pre-departure costs. The majority of Vietnamese migrant workers come to Japan with a large amount of debt but they expect to be able to settle their debts because salaries in Japan are higher than in Vietnam (Ishizuka 2013, 14). However, the reality of employment in Japan was contrary to the expectations of the trainees. Ministry of Health,

Labour and Welfare (2018) reported that 71.9% of the workplaces inspected were found to be below the minimum wage, non-payment of overtime, and in violation of labour regulations such as health and safety rules, as well as reports of sexual abuse and occupational deaths. The Justice Ministry said 171 trainees died between 2012 and 2017 due to unsafe working condition and overwork (*karoshi*), and 17 of them by suicide (Human Right Watch, 2020). The ratio of work-related fatalities per 100,000 foreign trainees is twice that of Japanese trainees, suggesting how bad the environment is for foreign trainees (Kyodo 2018). One factor that encourages crime among technical trainees is that they are not allowed freedom of movement.

Meanwhile, they are unable to change their employers, so they escape from poor working conditions and engage in illegal work and crime to pay their debts and living expenses (Sa Hoang 2013, 22). As one of the solutions to protect trainees, the Technical Trainees Law and the Organisation for the Training of Technical Trainees (OTIT) were established in 2017 to provide supervision and guidance to employers who report violations of the law (Technical Trainees Law, 2017), but the current situation is not functioning well as supervision and guidance cannot keep up with the increase in the number of technical trainees. Besides, the current system still maintains an unbalanced power relationship between employers and technical interns (Takenoshita 2016, 104).

Unlike Germany and Singapore, this could be addressed by guaranteeing the rights of migrants, which would help solve the increasing crime rate of migrants in Japan. The new specific skills qualification allows for freedom of movement of labour. However, because of the encompassing relationship between specific skills and technical training, as mentioned above, an argument for the right to freedom for technical trainees will be inevitable. Thus, the threat to the nation-state regarding public order in Japan was caused by restricting the rights of migrants. Instead, the threat to the nation-states may be averted by granting freedom of labour movement, and the migration trilemma is not valid in this context.

Another issue is the threat to public order posed by the admission of refugees and asylum seekers. The total number of refugees in Japan in 2019 is 1465 (UNHCR 2019 73), which is minuscule compare to Germany. In Germany's case, the increase in crime rates by migrants was most likely due to their lack of integration into the labour market. This phenomenon suggests that the possibilities for refugees coming to Japan to integrate into the labour market are also tricky and may increase the crime rates.

The negative impact of the refugee crisis in Europe has been depicted in Japanese media as a threat (Horiuchi and Ono 2018, 7:22), and polls have shown that many Japanese people perceived refugees as a threat. In public opinion polls, with 24.0% of respondents saying that Japan should actively accept refugees, 15.8% saying that the current situation is acceptable, and 56.9% saying that Japan should accept refugees cautiously, indicating that Japanese people tend to be wary of the risks posed by refugees (Japanese Cabinet Office 2003). In the WVS (2020) survey, when asked whether Japan should grant asylum to political refugees, disagree (10.3%), and a half (60.3%) said it was "difficult to say". These results show that the Japanese are wary of accepting refugees.

Like Singapore, Japan is sensitive to threats and takes a stance to eliminate potential threat elements. Therefore, it can be said that here Japan limits itself to the democratic value of personal dignity for refugees. Instead, the Japanese government contributed US\$114,370,310 to UNHCR in 2019, making it the fifth-largest contributor in the world (United Nation 2019b, 15). Japan has a policy of financially supporting international organisations (Yamagata 2017, 1), demonstrating to the world that Japan has democratic values. Restrictions on refugees' admission to avoid the risk of refugee threats are therefore likely to continue in the future.

Japan's immigration reform law will undoubtedly increase the number of immigrants, but it does not currently meet the criteria for mass-migration in terms of the proportion of immigrants. In a comparison with Germany and Singapore, the potential for future threats to Japan and whether the potential threats require restrictions on the rights of migrants was discussed. In Japan, where mass-migration has not yet occurred, the threat of migration to the nation-state is possible, but has not yet materialised. Therefore, the migration trilemma's third constellation is applicable, and the migration trilemma theory is valid. Furthermore, excluding the example of crime by immigrants, national identity, social cohesion, national security and public order by accepting refugees are threats according to the theory of migration trilemma when mass-migration and democracy are introduced.

Nevertheless, it should be borne in mind that these results must be interpreted with caution. A limitation is that mass-migration is not yet occurred in Japan. The criteria for mass-migration are set at 12.0%, but it is not clear at what level of immigration rate the German nation-state could

have avoided the threat. In the case of Japan, the study states that the criteria will be reached in 2065, but it is not clear what level of rates of immigration will lead to a threat, so it may become a threat before the criteria are reached, or it may not become a threat even if the criteria are reached. Therefore, it would be necessary to conduct a more detailed study focusing on the degree of mass-migration that could threaten the nation-state and determine an accurate baseline.

CONCLUSION

This study aimed to clarify the potential impact of mass-migration on Japanese society in terms of democracy and the nation-state. Based on a comparative study of Germany and Singapore, the thesis examined the possible consequences of mass migration. As a result, this study has shed light on the relationship between democracy and the nation-state in Japan. The study revealed that mass-migration could threaten national identity, social cohesion and national security, as it did in Germany. In order to counter this threat, it is necessary to restrict the rights of migrants, especially the right to settlement, following the Singaporean way. Except for crimes committed by technical interns of public order, it was found that restrictions on liberty were more likely to pose a threat to public order. Therefore, the migration trilemma was exceptionally not applicable in this case. Overall, it can be concluded that the trilemma theory of migration applies to all three countries. Both Germany and Singapore have experienced mass migration, with Germany prioritising democratic values resulting in a threat to its nation-state. Germany's policy decision has resulted in a threat to Germany's national identity through the amendment of its nationality law and a threat to social cohesion, national security and public order through the intake of large numbers of refugees. Singapore has been successful in protecting against threats to the nation-state by restricting immigrants' rights, particularly the right to freedom. Japan is currently not experiencing mass-immigration, so the nation-state and democracy are compatible, but a future influx of mass-migration could pose a threat to the nation-state, which would have to be countered by sacrificing immigrants' rights.

However, the primary limitation of this study is that the extent of mass-migration is not yet occurred in Japan. Hence, there is uncertainty about mass-migration in Japan, and it is not clear how many immigrants could pose a threat to the Japanese nation-state. In order to reinforce the validity of these results, future research should cover more countries, examine the relationship between mass-migration, democracy and the nation-state with more extensive micro-level data, and study whether the migration trilemma holds in different countries and whether there are

limitations. With the revision of Japan's immigration law, immigration will become more prominent in Japanese society in the future. According to the migration trilemma theory, defending against the threat to the nation-state posed by mass-migration in Japan's future will require the sacrifice of democracy. It is hoped that Japan will become a country that understands the relationship between mass-migration, democracy and the nation-state, and avoid the migration trilemma while accepting immigrants.

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