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Sequencing, People Movements and Mass Politicization in European and Trans-Tasman Single Markets

This article demonstrates the utility of comparative historical approaches and tools for temporal analysis in comparative regional integration. Over three decades Australian and New Zealand policymakers constructed a Trans-Tasman Single Economic Market that, like the Single European Market, creates supra-national authority and removes administrative barriers to free movement of goods, services capital and people. Like the Single European Market, the Trans-Tasman Single Economic Market regulates internal movements of people liberally. In Europe, some argue, liberal regulation of people movements has led to politicization of integration. In Australia and New Zealand integration has no mass political salience. This article compares European and trans-Tasman integration to explain these divergent outcomes. It shows how differing sequences of events can explain varying levels of mass mobilization around integration in the two cases. In Europe 'economic integration' preceded the liberalization of people movements. Trans-Tasman integration reversed this sequence.

There is no reason why, in this part of the world, we should fall short of the vision the Europeans have set themselves of a common European space. Although we have far more in common with each other than the numerous nations of Europe, we still face the same basic task of persuading ourselves that our distinct and separate national identities can continue to thrive in a supra-national framework. (New Zealand Prime Minister Geoffrey Palmer, draft letter to Australian Prime Minister Bob Hawke, April 1990)

IN 1983 THE AUSTRALIA–NEW ZEALAND CLOSER ECONOMIC RELATIONS TRADE Agreement (ANZCERTA) initiated a process that over three decades has led to construction of a Trans-Tasman Single Economic Market

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(TTSEM). Within the Trans-Tasman Single Economic Market goods, services, capital and people move with much the same freedom that is found inside the Single European Market (SEM). As with European member states in construction of the Single European Market, Australia and New Zealand relinquished national sovereignty to supra-national arrangements in constructing the Trans-Tasman Single Economic Market. Unlike in Europe, however, building a single market has not provoked public resistance to economic integration in Australia and New Zealand. Economic integration across the Tasman Sea continues to move forward as an elite-driven process to which publics pay little attention, much as European integration did before the 1990s.

At first glance, comparison of the Single European Market and the Trans-Tasman Single Economic Market seems unlikely. The former includes 27 countries, while the latter consists of two countries that share a language and a history as settler colonies. However, similar problems motivated integration in both places. The peculiar structure of Australian federalism creates no clear separation of powers in terms of market regulation between the Commonwealth, six state and two territorial governments (Painter 2001). As a result, regulatory segmentation between nine Australian jurisdictions and New Zealand prompted efforts to stimulate growth by 'integrating markets' in Australasia in much the same way (and at about the same time) that this process occurred in Europe. The Single European Market began with nine separate jurisdictions, while the Trans-Tasman Single Economic Market began with 10.

Similarly, Australasian policymakers understood the political challenges of economic integration as analogous to those faced by European policymakers. Although outside observers often fail to recognize it, Australians and New Zealanders have – increasingly – distinct national identities. Over the past four decades, in particular, their identities have diverged on core values such as multiculturalism and relations with Pacific Island communities. Geoffrey Palmer's uncertainties (in the quotation above) arise from concerns that Australians and New Zealanders could manage these differences in a common economic and social space. Such diverging developments raise questions about the relationship between identities and integration and whether it is the differences between values and communities or an ability to tolerate such differences that matter for 'deep' transnational policy coordination. It is in light of such questions – and of the

possibility for comparison – that the common experience of the Single European Market and the Trans-Tasman Single Economic Market with 'deep' and 'deepening' market integration across distinct national communities becomes interesting (Leslie and Elijah 2012a).

Australasian experience also provides a counterpoint to recent European developments. Arguably, its greatest advances have come from freeing up movement of people across the Tasman Sea and integrating the two countries' labour markets. By current estimates, over 650,000 people with New Zealand citizenship reside permanently in Australia – almost 3 per cent of Australia's population of 22 million (Australian Department of Immigration and Border Protection 2013). There are 65,000 Australian-born individuals who reside permanently in New Zealand – about 1.5 per cent of New Zealand's population of 4.3 million (APC NZPC 2012: 8). Australians and New Zealanders make up the largest group of non-citizens in the other's country and most of this movement has occurred over the past two decades. These observations are interesting because, although trans-Tasman integration has raised issues about people movements similar to those inside the EU, these issues have not (yet) provoked mass political resistance to integration. In Europe, by contrast, observers claim that by exploiting issues connected to people movements political entrepreneurs have pushed integration and sovereignty to centre-stage in electoral politics. Why have 'deep' economic integration and transnational regulation of people movements provoked mass resistance in Europe, but not in Australia and New Zealand?

Since the Maastricht Treaty scholars have observed and tried to explain growing resistance to and politicization of European integration. Arguably, Liesbet Hooghe and Gary Marks (2009) offer the most influential of these explanations – at least for events preceding Europe's 'sovereign debt crisis'. They posit that, since Maastricht, the political context surrounding European integration has transformed from 'permissive consensus', in which integration held little salience for mass publics, to 'constraining dissensus', in which mass politics limit elite-driven integration. Hooghe and Marks argue that this change reflects the incursion of transnational policy integration into issue areas – particularly movement of people, labour market access and citizenship – that touch on people's sense of identity. Transnational policies in these areas conflict with identities that are still defined in terms of *national* values and communities. Clashes between

transnational policies and national identities create 'demand' for appeals against integration, which political parties, interest groups and social movements 'supply'. These actors appeal to mass concerns about issues such as immigration and frame them as both a consequence of integration and a challenge to national values. By giving meaning to mass concerns, entrepreneurs bring themselves and masses into European decision-making processes. Hooghe and Marks use the label 'post-functionalist' to capture the penetration of mass influence into European integration. Furthermore, they generalize this 'post-functionalist' logic, stating that they 'see no compelling reason why the pattern of causality [they] detect in Europe is not valid for other parts of the world' (Hooghe and Marks 2009: 3, n. 6). If this is true, why have similar forms of integration not provoked popular resistance in Australia and New Zealand?

This article explains these divergent outcomes. It demonstrates that, despite similar socioeconomic development, political systems, forms of economic integration and levels of internal and external people movements, there is no societal 'demand' for appeals against integration linked to issues of people movements. Migration issues are electorally salient in both Australia and New Zealand, but, unlike in Europe, mobilizing agents have not connected them to trans-Tasman integration. The article argues that this is not because Australians and New Zealanders are so similar, but because they have accomplished something to which (some) Europeans aspire: they have embedded a preferential movement arrangement between the two countries not only in policies, but also in their citizens' values and identities. As Australians' and New Zealanders' identities have become increasingly distinct, they have (so far) maintained a special preference for each other. The article argues that these institutionally and culturally embedded preferences pre-empt appeals that link people movements and trans-Tasman integration and frame them as threats to national sovereignty and identity.

These preferences reflect the different *sequence* of events by which trans-Tasman integration unfolded as well as the century-and-a-half *duration* of this process. Liberal regulation of movement and migration across the Tasman preceded construction of national communities in Australia and New Zealand. Further, Australian and New Zealand governments institutionalized these freedoms before they undertook policies to integrate goods, service and capital markets. As a consequence, movement and migration across the Tasman became

institutionally and culturally entrenched in both societies before a process labelled 'economic integration' began. This created entrenched preferences that have persisted despite growing divergence between national values, despite deepening market integration and despite mass migration of New Zealanders to Australia.

The analysis is important methodologically and conceptually. Methodologically, it demonstrates the utility of comparing the context and concrete outcomes of processes of 'deep' transnational economic integration. This comparison recognizes such integration as a process of large-scale social change that, like other such processes, is socially embedded and temporal. It also demonstrates that the tools comparativists have developed to understand the embedded and temporal nature of other large-scale social changes are useful for understanding 'deep' and 'deepening' economic integration. This methodological approach, in turn, illuminates a conceptual question that is important to explanations – and concrete programmes – of 'deep' economic integration. Specifically, it asks how different identities and tolerance of them relate in shaping popular attitudes towards integration's consequences.

The article proceeds in five sections. The first considers explanations for mass politicization of European integration. The second suggests how considering transnational integration as a concrete and path-dependent process of social change alters expectations about transferring explanations of mass politicization from Europe. The third section builds a 'method of similarity' comparison of European and trans-Tasman integration. The fourth section demonstrates how the different sequence of events and duration of integration processes pushed European and trans-Tasman societies along different trajectories towards mass politicization of people movements. It is followed by a concluding section.

EXPLANATIONS OF MASS POLITICIZATION IN EUROPEAN INTEGRATION

This section considers explanations of mass politicization of integration in Europe. As early attempts to understand recent developments in European integration, these accounts offer insights into causal mechanisms that elite-centred explanations of European integration cannot.

As decision-making in an increasing number of issue areas moved to the European level in the 1990s, scholars anticipated an increase

in attention and opposition to European institutions and policies among European publics (de Wilde and Zürn 2012). Scholars sought indicators of this mass politicization in protest actions, referendums and political party competition. Imig (2002: 931–2), for example, suggests that 'protesters are becoming attuned to European issues and are slowly building a repertoire of contentious action' focused on the European level that includes: 'trans-national cooperation against domestic actors', 'collective European protests' and 'domestication of European issues within national politics'. Other observers looked for evidence of mass mobilization in referendums on European issues. Szczerbiak and Taggart (2004), for example, ask whether and under what conditions voters in nationally organized referendums on accession in countries joining the EU in 2004 turned out to vote and cast their votes based on European-level, rather than national-level, criteria. Scholars have also investigated the impact of deepening European integration on political party competition. For example, de Vries and Edwards (2009: 22) find that recently emerging Euro-sceptic parties, on the extreme right and left, 'are a decisive force in swaying popular opinion against Europe by mobilizing the growing uncertainties about the future of European integration among the mass public'. Scholars find indications of the mass politicization of European integration in demonstrations, referendums and party competition.

Recent scholarship explains mass politicization of integration in Europe as a two-step process (Green-Pedersen 2012; Hooghe and Marks 2009: 13; de Vries and Edwards 2009; de Vries and Hobolt 2012). The first step explains the creation of 'demand' for politicization, or a potential for mass mobilization in European publics around integration issues. The second step describes the 'supply' of politicization, or how agents such as political parties, interest groups and social movements activate this potential – or do not – in mass protests, referendums and elections. The following considers these two elements of explanation in turn.

Demand for mass politicization of European integration grows from an emerging tension between transnational policies and national identities (Green-Pedersen 2012; Hooghe and Marks 2009; Kreisi 2009). In this regard, some observers view the effects of European integration as similar to tensions coming from the globalization and denationalization of policies (Hooghe and Marks 2009; Kreisi 2009). Mass politicization begins when policies reach beyond

national boundaries. Often the forces extending policies beyond borders are functional, arising from actors' desires to 'internalize externalities' (Mattli 1999: 13). Actors – policymakers, firms, families – seek policy coordination across borders to permit welfare-enhancing transactions that national boundaries would otherwise impede. Integration alone, however, does not provoke mass resistance.

Extension of certain policies beyond national borders has increased public attentiveness to European integration. This is because policy coordination has 'Europeanized' more rapidly than identities. Underlying this perspective is a view that identities are constructed and malleable, rather than essential and fixed. Thus some observers suggest that experiences of European integration, such as enhanced mobility and transnational social interactions, have driven the growth of European identity, but they also recognize that this process may take place more slowly than the Europeanization of policies and that it may take place at differing rates among social groups (Fligstein et al. 2012). Others posit that identities are not only constructed and malleable, but also complex. Rather than 'Europe' replacing national identities, 'European-ness' is becoming embedded in national identities. However, this process is also gradual, incomplete and proceeds differently across social groups (Risse 2005: 291). Ultimately, post-functionalist explanations focus on the possibility of lags developing between the Europeanization of policymaking and the Europeanization of identities and for the agenda of integration to rub many Europeans' – still *national* – sense of identity the wrong way. In doing so, they focus on a snapshot of the constellation of identities generating contemporary contestation of integration rather than the trajectory of underlying developments. These issues are raised again below.

Where gaps open between transnational policy coordination and national identities, they activate social divisions that can crosscut conventional left–right cleavages and potentially leave interests unrepresented. As Hooghe and Marks (2009: 2, 16) explain, citizens are concerned not only with 'who gets what', but they also 'care – passionately – about who exercises authority over them' and, therefore, 'who is one of us'. Where identities are concerned, people care about the boundaries of the political community, sovereignty and integration. Since the Maastricht Treaty, integration processes have begun to intersect issues such as immigration, asylum and citizenship as well as currency and monetary policy that were previously reserved

for member states. Moving these issues into EU decision-making arenas creates potential to motivate masses in defence of national identities and national sovereignty against European integration.

These clashes with national identities introduce two changes to processes of European integration. Firstly, identity issues attract a broader audience. The greater salience of identity issues can generate mass mobilization around integration and push policy-making into public and electoral arenas. Secondly, conflicts that involve identities are less amenable to compromise and more likely to become zero sum. These arguments conclude that an expanding agenda has made European integration salient to a wider audience and intensified conflicts surrounding it. As a consequence, some observers expect European integration to slow or reverse (Hooghe and Marks 2009: 21).

Rising 'demand' associated with clashes between supra-national integration and national identities explains mass politicization only partially. The second aspect of these arguments focuses on the 'supply' of mass mobilization and political entrepreneurs' role in framing issues and cueing voters in opposition to integration. While observers agree that developments have created potential to mobilize masses against integration, they disagree about whether new or incumbent political actors, especially mainstream parties, perform this role (Hooghe and Marks 2009; Kreisi 2009; de Vries and Edwards 2009). This article does not attempt to resolve this dispute. Rather, it recognizes the logic underlying these arguments: agency by main-stream parties, new entrants, interest groups or social movements is necessary to frame issues and cue an otherwise latent potential around integration.

Observers of protest actions, referendums and party mobilization around Europe have all argued that low voter competence on EU issues gives political agents considerable latitude in framing integration as a threat to national sovereignty and/or values (Hobolt 2007; Hooghe and Marks 2009; Szczerbiak and Taggart 2004; de Vries and Edwards 2009). Some voters, for example, may require entrepreneurs to link people movements, integration and identity threats. Low voter competence may also permit entrepreneurs to link people movements that are only indirectly or even unrelated to integration policies as threats to identity arising from integration. In portraying people movements as a threat to national communities, entrepreneurs on Western Europe's far right often blur distinctions between

mechanisms that permit 'immigrants' to enter their countries. This point is interesting because, while EU policies ask European citizens to discriminate between EU 'immigrants' and non-EU 'immigrants', far right politicians often effectively ignore this distinction. They may also label Schengen arrangements as an 'open backdoor', even where there are relatively few arrivals by such mechanisms. As will be made clear below, a different situation exists between Australia and New Zealand.

Observers also recognize that context – particularly income gaps – shapes how political actors 'supply' appeals against integration (de Vries and Edwards 2009). Hooghe and Marks (2009: 17–18) show that, in wealthier Western European member states, people movements and integration create opportunities for mobilization against integration as a threat to national identities. These appeals are likely to crosscut conventional left–right divisions and come from far right parties. In the relatively poor Southern and Central and Eastern European member states, on the other hand, appeals against integration often reinforce conventional cleavages. Left parties, for example, may denounce integration's constraint of sovereignty and national authorities' capacity to affect distribution of resources (Hooghe and Marks 2009: 17–18). These observations are useful because an economic division also separates Australia and New Zealand. Australian incomes are considerably higher and this draws people across the Tasman as well as from poorer countries in the Pacific, through New Zealand. This situation parallels dynamics inside the EU and creates expectations about what kind of appeals should arise where in the trans-Tasman case.

Post-functionalist explanations also allow that institutional differences may affect 'supply' by constraining opportunities for new entrants. For example, laws prescribing or permitting referendums open greater opportunities for new entrants than those that proscribe them. Pluralitarian and majoritarian electoral systems as well as thresholds in proportional systems raise hurdles to new entrants.

In summary, post-functionalist accounts offer two potential explanations for the absence of mass politicization of integration. First, there is no 'demand' for appeals against integration. Integration has not touched issues such as immigration that affect people's identities. Second, political agents do not 'supply' appeals against integration. If mass politicization has not taken place around sovereignty/integration, it is because either 'demand' or 'supply' is absent. Comparison of the

trans-Tasman and European cases raises a problem for this perspective. The absence of mass politicization of trans-Tasman integration reflects a lack of 'demand', not of 'supply'. This lack of 'demand' exists despite close integration of labour markets and liberal trans-national regulation of people movements. Why did similar forms of integration create different levels of 'demand' for politicization in Europe and Australasia?

'COMPARATIVE HISTORICAL' APPROACHES AND COMPARING INTEGRATION

Understanding these different levels of 'demand' requires comparison of European and trans-Tasman integration processes. Unfortunately, scholars have not applied all of the tools offered by contemporary political analysis to comparing integration processes. Two of these in particular seem useful for 'comparative regionalism'.

First, contemporary comparativists offer an approach to comparison that can assist in resolving the so-called 'n = 1' problem in 'comparative regionalism'. Two decades of scholars have tried to compare processes by making 'region' or 'regional integration' the dependent variable for a generalized set of forces that either push integration forward or hinder it. Hameiri (2013) points out that this has led to a benchmarking approach in which empirical 'regions' are said to be more or less institutionalized or to display greater or lesser degrees of 'regionness' or 'actorness' (Doidge 2007; Genna and de Lombaerde 2010; Hettne 2005, de Lombaerde et al. 2009; Wunderlich 2012). Such benchmarking feeds an ongoing debate about whether the European experience and other cases of integration are comparable. Within this debate, perspectives alternate between the polarized views that Europe is the epitome of integration, on the one hand, and that it is unrelated to integration processes elsewhere, on the other. This so-called 'n = 1' problem is symptomatic of the limitations of the benchmarking approach to comparing integration processes (de Lombaerde et al. 2009; Sbragia 2008).

The comparative historical analysis approach offered by scholars of comparative political economy provides a solution to the 'n = 1' problem. Since the mid-1970s some comparativists have eschewed the grand theoretic ambitions of Marxists, structural functionalists and behaviouralists or pluralists (Berger 1981: 4ff; Granovetter 1985; Mahoney and Rueschemeyer 2003: 8–9; Thelen and Steinmo 1992: 1).

While they seek causal explanations for important questions, these 'middle range' approaches do not aim to produce 'universally applicable knowledge' immediately (Mahoney and Rueschemeyer 2003: 13). Rather, they seek to explain important outcomes, usually in a small number of cases, by recognizing that processes of large-scale social change are embedded within specific historical contexts (Mahoney and Rueschemeyer 2003: 13). This approach permits observers to transcend the 'n = 1' problem by distinguishing between those forces that are idiosyncratic to the context of a specific case of integration and those that are more general to processes of integration. Recognizing the embeddedness of change processes also has the advantage of permitting investigators to move easily between history and theory to develop new concepts and explanations or to refine old ones (Mahoney and Rueschemeyer 2003: 13). Because comparing transnational integration is a new field of inquiry that rests on a small number of diverse empirical cases, it can gain more from approaches suited to concept development than those designed to test general theories of integration.

Tools of temporal analysis developed by comparativists, particularly Paul Pierson (2004), explain how variance in context can drive similar integration processes toward differing outcomes. Pierson (1996, 2004) demonstrates how sequence, positive feedback mechanisms and duration shape large-scale social and political changes into path-dependent processes. The sequence by which changes unfold is important because earlier events often have greater causal weight than later ones. One reason for this is that positive feedback mechanisms reinforce the circumstances that led to initial conditions or decisions. For example, a decision to liberalize trade restrictions can lead to further liberalization by reinforcing interests that sought – and penalizing interests that opposed – liberalization initially (Baldwin 2009). Duration is important because some change processes may proceed more quickly than others. So, for example, policies and material interests may change relatively quickly, while processes of institutional, value and identity change may be 'big, slow moving and … invisible' (Pierson 2003: 177). The longer feedback mechanisms operate, therefore, the more policies, interests, institutions and identities may become aligned and mutually reinforcing, rendering a course reversal increasingly unlikely. Path dependence means that similar processes of economic integration may follow trajectories that vary in important ways. These observations help

explain how similar European and trans-Tasman integration processes produced different outcomes in terms of mass politicization.

A TRANS-TASMAN COMPARATOR FOR EUROPEAN INTEGRATION?

Are European and trans-Tasman experiences of integration sufficiently similar to permit meaningful comparison (Skocpol and Pierson 2002)? The outcome under investigation is the mass politicization of integration – in the form of protests, referendums and/or party competition – rather than integration itself. The utility of a comparison rests on whether similarities between cases permit observers to hold alternative causes of mass politicization constant and assess the impact of a study variable. Here it is important to introduce a qualification. 'Post-functionalist' approaches focus on 'demand' for and 'supply' of appeals against integration based around people movements to explain mass politicization of European integration. However, currency union also aroused European publics. Policymakers in Australia and New Zealand, on the other hand, have considered, but never implemented, currency union. This means that, if mobilization around currency union is necessary to explain the politicization of European integration, then the absence of currency union in the trans-Tasman case, not differing sequences of integration, might explain the divergent outcomes. If, however, integration of people-movement policies is sufficient to explain mass politicization of European integration, and conditions in each case are sufficiently similar on this issue, then sequencing remains a viable explanation. Unfortunately, a decision about the relative importance of monetary union must wait until Australia and New Zealand undertake currency union and/or policymakers outside both Europe and Australasia undertake similar efforts at deep economic integration.

With the preceding qualification in mind, the analysis proceeds from the assumption that Europeanization of people-movement policies is sufficient to explain mass politicization of European integration and asks whether 'supply' and 'demand' conditions in this issue area are similar enough in Australia and New Zealand to permit meaningful comparison. Starting with 'supply', one finds appeals similar to those political actors used to mobilize Europeans against integration in Australia and New Zealand, but only at the margins of politics. On the 'demand' side, social and political conditions inside Australia and New Zealand resemble those inside EU member states.

The level and scope of trans-Tasman economic integration are also similar to those found in the Single European Market. This section demonstrates that, with regard to people-movement issues, conditions in the two cases are very similar.

From a 'post-functionalist' perspective two conditions must prevail to create 'demand' for appeals against integration. Firstly, identity issues must be politically salient to masses of individuals. Secondly, the *scope* and *level* of integration must raise issues that can be framed to arouse concerns about values and identities (Hooghe and Marks 2009: 13). From this perspective, 'demand' for politicization rests on the existence of particular social divisions and transnational integration of movement-of-people policies. Both conditions exist in Australia and New Zealand.

Social structure in Australia and New Zealand is similar to that in European member states, especially the EU-15. Firstly, they have a similar GDP per capita. The OECD estimates per capita GDP (PPP) in Australia (2012) at US$ 45,016 – in fifth place, above all EU-15 countries except Luxembourg. By the same measure, New Zealand ranks twentieth, with an estimated per capita GDP of US$ 32,163 – below the OECD average (US$ 36,931), at about the level of Spain and Italy, but behind all other EU-15 countries except Portugal and Greece.

Australia and New Zealand also resemble European member states in terms of social values. On the World Values Survey of Traditional/Secular-rational and Survival/Self-expression values, Australia and New Zealand score 0.21/1.75 and 0.00/1.86, respectively (Inglehart n.d.). This locates them closer to countries of (northern) Catholic Europe (Belgium, France and Luxembourg) and Protestant Europe (Finland, Iceland, the Netherlands, Switzerland) than some of the other English-speaking democracies (Ireland, Northern Ireland, the US) (Inglehart and Welzel n.d.). They are closest to each other, Great Britain (0.06/1.68) and Canada (−0.26/1.91). In terms of incomes and certain values, Australia and New Zealand are similar to EU member states.

Identity issues are as politically salient in Australian and New Zealand as they are in Europe. In mid-2012, as the annual intake of immigrants and refugees approached a post-war record, 51 per cent of Australians supported a stop to all immigration (Wright and Masanauskas 2012). In New Zealand, identity and sovereignty politics feature significantly in parliamentary elections. In the 2005 general election the National Party campaign focused on identity divisions

between Maori and 'European' New Zealanders to considerable effect (Stephens and Leslie 2011). Since 1996 New Zealand voters have returned the anti-(Asian) immigration New Zealand First Party in five of six parliamentary elections. Finally, strong support for the anti-nuclear policy that prevents US warships from entering New Zealand ports demonstrates the electoral salience of sovereignty (Capie 2007). Australian and New Zealand electorates are no more or less receptive to identity and sovereignty politics than electorates in EU member states.

The level and scope of trans-Tasman integration are also similar to those found in Europe and, therefore, cannot explain differences in 'demand' for mass politicization (Börzel 2005). First, Börzel (2005) uses level to indicate whether state actors have relocated policy-making authority to supra-national arrangements. Australia and New Zealand have transferred significant dispute-settlement and legislative authority to transnational arrangements (Leslie and Elijah 2012b). The structure of these arrangements differs from the EU. Like arrangements in the EU, trans-Tasman supra-nationality takes two forms (Best 2005: 8–9; Moravcsik 1998: 67–8). First, a few autonomous transnational agencies – Joint Accreditation System Australia–New Zealand (JASANZ), Food Standards Australia and New Zealand (FSANZ) and the Australia–New Zealand Therapeutic Products Agency (ANZTPA, operational in 2014) – exercise dispute resolution, legislative and even some executive authority in specific issue areas. These agencies supplement a broader array of supra-national arrangements within the Council of Australian Governments (COAG) ministerial councils and officials' meetings. In Council of Australian Governments structures, supra-nationality takes form as 'pooled sovereignty', resembling supra-nationality in the European Council and Council of Ministers. New Zealand representatives sit alongside counterparts from governments of the Australian Commonwealth, states and territories and each government casts one vote in majoritarian decision-making procedures. The Council of Australian Governments' supra-national arrangements are issue specific and, until a July 2011 reform, New Zealand participated in approximately 40 Council of Australian Governments ministerial councils and hundreds of officials' meetings. The difference between trans-Tasman and EU supra-national arrangements exists in the relative mix of international agencies and pooled sovereignty arrangements as well as the breadth of their issue competencies.

This difference notwithstanding, similar levels of integration exist in each case.

European and trans-Tasman integration also resemble one another in scope. Börzel (2005) uses 'scope' to refer to the breadth of issue areas in which member states move policy-making authority to supra-national arrangements. As in the EU, supra-national policy coordination between Australian and New Zealand jurisdictions occurs mainly in market regulation, while distributive, foreign and security policies remain under national sovereignty – although significant coordination of these policies also takes place in both cases. Across three decades, Australian and New Zealand policymakers transformed the Australia–New Zealand Closer Economic Relations Trade Agreement into a trans-Tasman 'single market' that resembles the Single European Market. As noted above, trans-Tasman economic integration does not include currency, or customs union, but it has advanced free movement of goods, services, capital and people in a manner resembling – and inspired by – the Single European Market (APC NZPC 2012; Leslie and Elijah 2012a).

Most importantly, from the perspective of post-functionalist explanations of politicization, trans-Tasman regulation of labour markets and people movements is as, or more, liberal than Europe's (Messerlin 2011). Under the Trans-Tasman Travel Arrangement (TTTA) citizens of each country are free to travel to, reside and work in the other country. Under the Trans-Tasman Mutual Recognition Arrangement (TTMRA) individuals registered in an occupation in one jurisdiction may practise that occupation in any jurisdiction. In sum, trans-Tasman integration is similar in level to European integration and its scope encompasses precisely those issues that post-functionalist explanations claim are most important for mass politicization of European integration. Thus, although 'demand' for politicization differs in Europe and Australasia, the background conditions for it are similar.

What about 'supply'? Different constraints on the behaviour of mainstream political parties and/or new entrants might explain the lack of politicization of trans-Tasman integration. Firstly, institutional constraints might inhibit 'supply'. Secondly, political actors might fail to supply appeals against integration. Again, however, constraints within Australia's and New Zealand's political systems appear similar to those in Western EU member states.

Australia's democratic institutions are neither more nor less constraining on 'supply' than those in West European democracies.

Arend Lijphart (1999) suggests that Australians have 'adapted' majoritarian Westminster institutions in two ways. First, they replaced Westminster's 'unitary' state structure with a federal structure and a second chamber (Senate) that integrates senators from states and territories into legislation. Second, voters elect senators directly, but according to a single transferable vote (STV) system that is more proportional than the alternative vote system used for elections to the House of Representatives. These adaptations make Australian institutions more consensual than other Westminster systems, but they remain majoritarian (Lijphart 1999: 318). The implications of these alterations for politicization of trans-Tasman integration are ambiguous. On the one hand, majoritarian House elections impose a two-party logic over that chamber and cabinet construction that should limit uncertainties around coalition formation and reduce calculations about the effects of politicizing integration to an estimation of its impact on voter behaviour (Green-Pedersen 2012). Will politicization help the electoral prospects of either Labor or the Liberal–National coalition?[1] In this sense, the Australian context resembles Great Britain, where the Conservative Party chose to politicize European integration. However, the proportional logic of the single transferable vote leads to multipartism in the Senate and a need for legislative coalitions with smaller parties. Proportionality in Senate elections, elections in federal units and formal or de facto factionalization in the Labor and Coalition Parties complicate coalitional calculations, but lower barriers to entry for new actors. Australia's political institutions create conditions neither more nor less conducive to politicization than those found in European member states.

Australian parties have also mobilized voters by linking identity issues to movements of people – if not to movements of people across the Tasman. In the 1980s, John Howard, as leader of the opposition Liberal Party, advocated a 'One Australia' policy and restriction of Asian immigration. As prime minister from 1996 to 2007, he campaigned on issues of border control and limited access for those seeking political asylum. In government from 2007 to September 2013, the Australian Labor Party did not change course. Yet, while the number of New Zealanders (20.2 per cent of total settlers) arriving (July 2010–June 2011) to reside in Australia is almost twice as large as the next group by country of origin (China including Taiwan at 11.5 per cent of total settlers), New Zealand

migration remains outside official immigration statistics and out-side electoral politics (Australian Department of Immigration and Citizenship n.d.).

Only on the fringes of the political system do appeals arise against migration from or through New Zealand. Based on the European experience, one would expect Australian entrepreneurs to frame people movements and integration as threats to national values and identity. New Zealanders themselves could be targeted. Or Australian entrepreneurs could frame New Zealand's liberal immigration/naturalization arrangements with several Pacific island countries as an unsecured 'back door' for unwanted immigrants. While some Australian policymakers have expressed their concerns about this situation (McMillan 2012), only a single backbench Labor MP has publicly opposed immigration from or through New Zealand (Espiner 2009). Even on the far right, parties such as Pauline Hanson's One Nation Party – which campaigns against immigration and multi-culturalism – have not presented trans-Tasman integration as a threat to national sovereignty or values. Only the tiny Australian Stable Population Party (founded in 2010) advocates restricting New Zealand immigration and abolishing the Trans-Tasman Travel Arrangement. Immigration from or through New Zealand is not an electoral issue at either regional or federal level. Political actors have articulated appeals against trans-Tasman integration based on immigration, but these appeals remain marginal.

The 'supply' situation in New Zealand is similar: actors articulate appeals against integration, but they remain outside mass politics. New Zealand's democratic institutions do not impede politicization of integration. Since 1996, New Zealand has elected members to its unicameral parliament according to a mixed member proportional (MMP) electoral system with a 5 per cent threshold. Predictably, transition from first-past-the-post to a mixed member proportional system caused a proliferation of small parties across the political spectrum. Also, since 1996 all New Zealand governments have been coalition or minority governments. As in many EU member states, New Zealand's multipartism creates coalitional uncertainties for mainstream parties around politicization of new issues. However, the mixed member proportional system also lowers barriers to new entrants. Also, since the early 1990s New Zealanders have held referendums on several issues, including at least one – the legality of parents' use of corporal punishment on their children – that was

calculated to activate value/identity cleavages. New Zealand's democratic institutions create no special constraints on politicization of integration.

Political actors in New Zealand have also articulated appeals framing integration as a threat to national sovereignty, but these appeals have remained separate from the trans-Tasman relationship and/or mass politics. Following post-functionalist explanations of politicization in Europe, one would expect such appeals within New Zealand – as the poorer society and source of migration – to come from the left, binding the maintenance of sovereignty with distributional and identity issues. Indeed, concerns have been raised that trans-Tasman migration is causing a 'brain drain' or 'hollowing out' of New Zealand's economy (APC NZPC 2012). However, such appeals have never come close to electoral politics or policy. This stands in stark contrast to negotiations for a Trans-Pacific Partnership (TPP) Agreement. In particular, the Trans-Pacific Partnership has raised public concerns about US intellectual property rights regulations restricting sovereignty and the government's ability to ensure New Zealanders' access to low-cost prescription medicines. Remarkably, this controversy erupted after the New Zealand government had already ceded much of its sovereignty on these issues to a joint Australia–New Zealand Therapeutic Products Agency – a development that received no public attention after 2008. Further, while New Zealand politicians do not seek electoral advantage by asserting sovereignty vis-à-vis Australia, the New Zealand-owned Kiwi and ASB banks have both used their 'independence' from Australian banks in successful advertising campaigns. Appeals based on national sovereignty are present, but they have not been linked to trans-Tasman integration in mass politics.

Conditions for the 'supply' of and 'demand' for politicization of integration in Australia and New Zealand appear similar to those found inside the EU. Despite these similarities, no 'demand' for such appeals has arisen in either country. How can we explain that sovereignty and movement of people became linked politically to integration in Europe but not in the trans-Tasman relationship? The next section compares the historical development of free movement of people and integration in both places. It demonstrates how temporal mechanisms such as sequence, positive feedback and duration moved developments in each place along a different path.

TIME, MOVEMENT OF PEOPLE AND TRANS-TASMAN INTEGRATION

This section demonstrates the utility of a contextualized comparison of efforts to integrate markets deeply across national borders. It argues that context and timing offer an alternative explanation for the different European and trans-Tasman experiences with regard to the mass politicization of integration around people movements. This argument stands in contrast to the position that Australians and New Zealanders are, and always have been, so similar that they do not notice each other's presence, while differences between Europeans have led to mass politicization. Instead, it suggests that integration followed a path that shaped values about people movements differently in each case. In Europe, movement-of-people issues came onto the agenda of integration a generation *after* Europeans began coordinating national economic policies. Australians and New Zealanders, on the other hand, institutionalized free movement of people across the Tasman generations *before* goods-market integration began with the Australia–New Zealand Closer Economic Relations Trade Agreement (1983). Over more than a century, free movement across the Tasman became entrenched both institutionally and culturally. Differing sequences of integration produced diverging sets of values, which in turn created differing opportunities for mobilizing masses around people movements and integration. The following briefly outlines the development of the freedom of movement of people in the European Union. Then it demonstrates how long-term maintenance of free movement across the Tasman has left fewer opportunities for the politicization of integration around people movements in Australia and New Zealand.

Although enshrined in the Treaty of Rome (1958), free movement of people only became politically salient in the 1990s after changes introduced in the Single European Act (1987), Maastricht (1993), Amsterdam (1999), Nice (2001) and Lisbon (2009) Treaties. The Treaty of Rome provided for free movement as one of the 'four freedoms' (Art. 18) and elaborated this freedom in the context of work (old Art. 48), self-employment (old Art. 52) and service provision (old Art. 59). Regulation 1612/68 (1968) codified full freedom of movement for workers subject to member states' public policy, security and health concerns (Lavenex 2007: 35). Despite a relatively liberal movement regime, and substantial pay differentials between member states, intra-European mobility remained low until the 2004

Central and Eastern European countries enlargement (Shah and Long 2004). With the Single European Act, however, freedom of movement extended beyond workers to family members, placing free movement of people and European integration into the realm of social policy. The Maastricht Treaty, creation of European political union and Pillar Three placed immigration, citizenship and asylum on the agenda of European integration. The Amsterdam, Nice and Lisbon Treaties drew these issues increasingly into supra-national EU policymaking processes.

The sequence of events is important. Between the Rome Treaties and the Single European Act substantial economic integration took place about which most Europeans had, at least, superficial awareness. As a result, the Single European Act, Maastricht, Amsterdam, Nice and Lisbon Treaties increased EU-level coordination of people-movement issues within a context that citizens identified as 'European integration'. The accession of Central and Eastern European countries further increased citizens' identification of the EU with people-movement issues. Post-functionalist explanations suggest that EU-level coordination of people-movement policies within this context created opportunities for mass mobilization against European integration. They also provide considerable evidence to support this explanation. The problem is that this sequence of events – goods-market integration followed by expanded regulation of people movement – is particular to Europe and not general to processes of integration.

Trans-Tasman integration reversed this sequence of events. Regulation of people movements *preceded* the coordination of other economic policies between Australia and New Zealand. To the present, few citizens in either country associate free movement of people with integration policies. This situation reflects the impact of events unfolding across more than a century and a half. Free movement of people across the Tasman Sea began in colonial times and survived developments that increased distinctions between Australian and New Zealand societies. The following does not explain the construction of Australian and New Zealand nation states and identities or the causes of trans-Tasman economic integration. Rather, it describes the effects of long-term stable regulation of trans-Tasman people movements in a changing context.

The most obvious element of this context is geography. Two thousand kilometres of water separate the two countries. For over a century, the Tasman Sea was largely an impediment to people

movements and an impetus for separate Australian and New Zealand political developments. However, it was also an avenue for communication that expanded, rapidly, as technology reduced transport costs.

Geography was central to the development of Australia and New Zealand as distinct nation states. Political developments in the two countries began to diverge at the end of the nineteenth century, when the logic of nation state organization brought contending views about how to reconfigure existing colonial structures. New Zealand's connection to Australia was ambiguous. From 1840 New Zealand had an independent colonial administration. Prior to this, New Zealand was part of New South Wales. During the 1890s New Zealand political leaders participated in meetings to prepare Australia's 1901 Constitution. However, while the Constitution's preamble recognizes New Zealand as a potential state, New Zealand's leaders cited geographic distance as a reason for independence.

Over the following century, decolonization and nation-building led to the construction of separate national communities in Australia and New Zealand that, with time, have become increasingly distinct. Economic, climatic and geographic features explain some of these differences. Perhaps the most important difference, however, arises from the history of European settlers' relations with resident, non-European populations in each country. In New Zealand, a history of violent conflicts between European settlers and Maori has evolved into domestic bi-(multi-)culturalism institutionalized in, among other things, the quasi-constitutional Treaty of Waitangi. Externally, these developments contributed to an orientation toward the Pacific island countries that includes preferential terms for immigration and naturalization of their citizens. Australia's equally violent history of settler–resident relations resulted in neither institutionalized multiculturalism nor an external Pacific orientation. While these differences were muted for much of the twentieth century, they produced clear ethnic, cultural, religious and linguistic divergence between the two national communities from the 1970s.

Interestingly, growing differences in the two national communities paralleled rapid growth in the number of New Zealanders resident in Australia. As with ethnic minorities in other developed countries, first Maori and then Pasifika New Zealanders asserted their position in the economy, society and political system from the 1970s. In public awareness, these developments transformed New Zealand into New Zealand Aotearoa. As this was happening, New Zealanders – and

disproportionately Maori and Pasifika New Zealanders – began moving to Australia in unprecedented numbers. Their presence grew to over 600,000 from the approximately 50,000 in Australia in the mid-1960s (Conway et al. 2013: 23, Figure 23). So, even as their identities became more distinct, Australians and New Zealanders increasingly came into contact with one another.

Geography has also shaped the regulation of these people movements. While state- and nation-building processes divided the societies, prohibitive transport costs limited movement and incentives for emerging Australian and New Zealand states to regulate it. Only security concerns arising during the First World War prompted Australia and New Zealand to record and restrict trans-Tasman people movements (Mein Smith and Hempenstall 2008: 62). In 1920 the two countries removed wartime restrictions and formalized the right of 'white' British subjects and Maori New Zealanders to move between, reside and work in either society (Mein Smith and Hempenstall 2008: 62–3). Relatively liberal regulation has persisted since.

Since the 1960s two processes changed the context around the regulation of people movements. First, technology reduced transport costs. When transport costs declined, a liberal movement regime was already in place and the numbers using it grew rapidly. Statistics for short-term visits as well as long-term and permanent migration in both directions reflect the declining cost of air travel. Each country is the leading destination for residents from the other, and in 2012–13 a million residents of each country visited the other (Statistics New Zealand 2013; Tourism Australia 2013).

A second process – 'regionalism' – also changed the context around people movements, although its consequences for free movement are ambiguous. UK applications to join the European Economic Community refocused Australian and New Zealand policymakers' attention on one another. A tentative trans-Tasman re-engagement began with a decade of managed trade under the New Zealand–Australia Free Trade Agreement (NAFTA, 1965) (Bollard and Mayes 1992). In 1973, a decade before the trade liberalization of the Australia–New Zealand Closer Economic Relations Trade Agreement, Labo(u)r governments in the two countries introduced the Trans-Tasman Travel Arrangement.

The Trans-Tasman Travel Arrangement was a critical moment in the trans-Tasman relationship. On one level it simply updated practices institutionalized in 1920, permitting citizens and permanent

residents of both countries – regardless of race – to visit, reside and work in either country without a passport or visa (Mein Smith and Hempenstall 2008: 64). In doing so it complemented earlier trans-Tasman agreements that facilitated movement by easing migrants' access to naturalized citizenship and certain social benefits. Also, like many arrangements underlying trans-Tasman integration, the Trans-Tasman Travel Arrangement is not legally binding. However, legalization is less important than the fact that the Trans-Tasman Travel Arrangement has become deeply entrenched in both countries' policies and commitments to one another as well as their citizens' expectations. The importance of the Trans-Tasman Travel Arrangement is that it cemented a liberal movement regime between the two countries precisely as other socioeconomic developments were increasing the distinctiveness of Australian and New Zealand identities and facilitating mass migration of New Zealanders to Australia.

Somewhat later, deepening economic integration also began to push liberalized labour market access. By the end of the 1970s, domestic and international economic turbulence as well as frustration with the limitations of the New Zealand–Australia Free Trade Agreement drove officials in both countries to negotiate the Australia–New Zealand Closer Economic Relations Trade Agreement. A five-year review of the agreement in 1988 led to service market integration and agreements on technical barriers to trade (Leslie and Elijah 2012a). These developments, in turn, prompted negotiation of the Trans-Tasman Mutual Recognition Arrangement. The Trans-Tasman Mutual Recognition Arrangement creates a mutual recognition regime not only for goods standards, but also for registered occupations. After 1998, individuals working in a registered occupation could practise their trade or profession legally in any jurisdiction in Australia and New Zealand. Together the Trans-Tasman Travel Arrangement, Trans-Tasman Mutual Recognition Arrangement and intergovernmental agreements to make healthcare and pension benefits portable have prompted unparalleled integration of labour markets.

Trans-Tasman regionalism also imposed restrictions on people movements, however. Even before the Australia–New Zealand Closer Economic Relations Trade Agreement, security concerns – terrorism and drug trafficking – led the Australian government to reintroduce passport and visa requirements for movement between the countries in 1981 (Mein Smith and Hempenstall 2008: 64).[2] More dramatically, in 2001 Australia's federal government rescinded some advantages

that New Zealanders residing in Australia enjoyed under the Trans-Tasman Travel Arrangement. Resident New Zealanders retained unrestricted entry and access to labour markets, but lost title to subsidized loans for tertiary education, and some other social benefits. They also no longer acquired automatic permanent resident status or special access to naturalized citizenship. Even so, New Zealanders retain special status and are not counted with other 'immigrants'. Australians resident in New Zealand, on the other hand, have retained all the rights granted under the Trans-Tasman Travel Arrangement. The Australian government's actions resulted from negotiations with New Zealand over the budgetary impact of migration rather than in response to popular reaction against it. New Zealand policymakers accepted this asymmetry to protect the Trans-Tasman Travel Arrangement and the two countries' preferential relationship (McMillan 2012). Despite these developments, an overwhelming majority of citizens remain unaware of the policies underpinning their ability to live and work in each other's country (APC NZPC 2012).

Although the regulation of trans-Tasman people movements has moved towards restriction as well as liberalization, three observations should be taken from this development. Firstly, while regulations put in place by the Trans-Tasman Travel Arrangement, Trans-Tasman Mutual Recognition Arrangement and other arrangements make the movement regime one of the most liberal in the world, it is also governed, in part, by supra-national institutional arrangements in the Council of Australian Governments. Secondly, the liberal regulation of trans-Tasman people movements preceded (for example, the Trans-Tasman Travel Arrangement) or coincided with (for example, the Trans-Tasman Mutual Recognition Arrangement) integration of goods, services and capital markets. Thirdly, despite deep integration of labour markets and mass migration of New Zealanders to Australia, neither country has experienced mass political mobilization against integration. Trans-Tasman 'regionalism', unlike European integration, remains an elite-driven process that attracts little public attention.

A sequence of events different from the pattern of European integration offers an interesting explanation of this outcome. Freedom of movement and migration across the Tasman preceded not only integration of goods, services and capital markets but also construction of national identities and nation states. Maintenance of a liberal

regime for people movements during processes of nation-building meant that, when transport costs declined, few administrative measures impeded mass movements and mass migration between the two societies. On the contrary, in 1973, when some European governments were restricting foreign workers' access to their labour markets, policy-makers in Australia and New Zealand institutionalized their citizens' rights to work and reside in the other's country. Since the 1970s two generations of Australians and New Zealanders have travelled and migrated back and forth across the Tasman. Even as the two national communities became increasingly distinct, institutions reinforced pre-ferences for citizens of the other country. Most citizens have grown to accept this movement and the mass presence of residents from the other country in their society as 'normal'.

The relationship between difference and tolerance is important for investigations of integration. Unfortunately, observers have collected little data measuring how citizens of Australia and New Zealand perceive one another. One can point only to anecdotes and indirect indicators of their mutual tolerance and its effects. On the one hand, differences between Australians and New Zealanders are becoming increasingly visible. Each can recognize the other's accent as easily as Americans (or Germans) can recognize Anglophone Canadian (or Austrian) accents. Similarly, ethnic, cultural and religious differ-ences are becoming more visible. So, for example, during the 2013 Australian election campaign a Maori New Zealander resident in Perth announced plans to construct a marae (Maori ceremonial building) near his Australian home (Radio New Zealand News 2013).

Even as these differences become more visible, each community has developed – and institutionalized – a distinct preference for citizens of the other. This preferential status shows up in policies, such as the Trans-Tasman Travel Arrangement and the exclusion of Australian and New Zealand citizens from each other's immigration statistics. These preferences also appear in 'softer', but – perhaps – deeper forms of expression such as language. Politicians across the political spectrum in both countries use similar terms to describe the unique nature of the trans-Tasman relationship. At a 2012 meeting, New Zealand's National Party Prime Minister John Key described the relationship as 'like no other', while his counterpart from the Australian Labor Party, Julia Gillard, described it as 'family' (APC NZPC 2012: 3). During the 2013 parliamentary election campaign, Pauline Hanson of the far right Australian One Nation Party claimed, 'We have opened our

borders and our hearts to people from all over the world offering them the opportunity to become Australian citizens, but not to our closest neighbours, our allies and our Anzac mates' (Ansley 2013). Explicit preferences for each other's citizens are repeated regularly, publicly and without contradiction across all levels in both societies. This popular framing of the relationship in 'familial' terms reflects both a recognition and tolerance of differences. It is the institutional and cultural entrenchment of these preferences that has so far limited 'demand' for appeals that would mobilize people against trans-Tasman integration as a threat to national sovereignty and identity.

A final set of observations demonstrates how these preferences shape the electoral politics of people movements in each country. Because they stand apart from 'immigrants' in official statistics and public perceptions, Australian politicians also afford New Zealanders privileged status in electoral campaigns. This is visible in the run up to the 2013 Australian parliamentary election. In polls preceding the election, the Labor-led government trailed the opposition by historic margins. In the final parliamentary session before the election the government introduced reforms to employer-sponsored, temporary '457' visas for foreign workers. Internal Labor Party polling suggested such reforms addressed voter concerns in marginal seats about foreign workers competing for jobs (Howe 2013). In a heated debate, opposition politicians labelled government rhetoric on '457' temporary work visas as 'racist', 'xenophobic' and 'similar to Pauline Hanson's agenda'. It is noteworthy that no one mentioned the larger number of New Zealanders working in Australia under the Trans-Tasman Travel Arrangement (Howe 2013). This silence held, despite a parallel campaign by social organizations to make Australians aware of resident New Zealanders' hardships resulting from the 2001 Trans-Tasman Travel Arrangement restrictions. Indeed, this sympathy campaign is what prompted Pauline Hanson to describe the Trans-Tasman Travel Arrangement restrictions as 'unreasonable and discriminatory'. Across the political spectrum, Australian politicians accord New Zealanders special status and cannot or will not equate them with other 'immigrants'.

An equally revealing development has taken place around the politics of trans-Tasman people movements in New Zealand. Political oppositions – whether from the Labour or National Party – have used mass migration of New Zealanders to Australia to indict the incumbent government for mismanaging the economy. In the late 1990s,

Labour Prime Minister Helen Clark used migration statistics to criticize her predecessors from the National Party for permitting an earnings gap to open between the two countries (New Zealand Parliament 2008). In the 2008 election that unseated Clark's government, leader of the National Party opposition John Key asked what it said about the 'Government's management of the economy when, after 9 years of Labour, 46,000 people went to live permanently in Australia last year and only 13,000 came back' (New Zealand Parliament 2008). In the same election the National Party launched its billboard campaign with a hoarding outside Wellington Airport that depicted jets departing while exhorting New Zealanders to 'Wave goodbye to higher taxes. Not your loved ones' (National Party of New Zealand 2008). Days before the 2011 election, the leader of the opposition Labour Party, Phil Goff, seized on the release of another Statistics New Zealand migration report to claim that 'John Key has been given a resounding vote of no confidence with one hundred Kiwis leaving New Zealand for a "brighter future" in Australia each day' (Goff 2011). Trans-Tasman migration is electorally salient in New Zealand and increasingly so in Australia. In neither country, however, have entrepreneurs – despite opportunities to do so – connected migration to trans-Tasman integration as a threat to national sovereignty and/or identity. Preferences embedded in Australian and New Zealand policies and identities pre-empt the demand for such appeals.

CONCLUSION

Comparison across time shows that trans-Tasman and European integration followed different sequences. Unlike European migration, the liberalization of trans-Tasman people movements preceded not only the opening of goods and other markets, but also the construction of national identities. When declining transport costs permitted mass movement across the Tasman from the 1970s, policymakers institutionalized customary trans-Tasman people movements in the Trans-Tasman Travel Arrangement rather than impeding them. Now, Australians and New Zealanders represent, by wide margins, the largest group of non-citizens resident in each country. In contrast to the European experience, political actors have not used movements across the Tasman to mobilize people against trans-Tasman integration.

Free movement and the presence of Australians and New Zealanders in each other's societies through the processes of nation-building and economic integration have resulted in a popular tolerance of the other's differences and acceptance of the relationship as 'familial'. This tolerance leaves little 'demand' for appeals that present people movements and migration related to trans-Tasman integration as a threat to identity or sovereignty. So far, political actors have used neither migration, nor any other issue, to make trans-Tasman integration politically salient to masses of people. These observations lead to some concluding remarks.

The first is disciplinary and methodological. Comparativists can contribute much to understanding processes of 'deep' economic integration. A comparative historical approach that undertakes causal analysis of particular outcomes in their historical context would appear well suited to the problems faced by the relatively new field of comparative regionalism. Contextualized comparisons have proven useful for concept development in other fields and might help those interested in how 'comparing regions' overcome difficulties that arise under the 'n = 1' problem.

A second contribution comparativists can make is the introduction of tools for temporal analysis. As processes of large-scale social change, efforts to integrate societies are 'embedded' and they unfold over time. While comparative historical analysis spotlights context and embeddedness, comparativists also provide tools that demonstrate why the context within which integration efforts are embedded is so important. Positive feedback mechanisms, sequence and duration all shape how integration processes unfold. Indeed, comparing European and trans-Tasman integration across time has raised here interesting questions about the concept of identity, how identities might change and the ways different identities might relate to one another. These are precisely the kind of conceptual issues comparative historical analysis has illuminated in other contexts.

One must also recognize the limitations of the argument in this article and of post-functionalist explanations of European integration. First, evidence presented here of the affinity of Australians and New Zealanders for one another is circumstantial and indirect. The absence of political mobilization against trans-Tasman migration is not prima facie evidence that Australians and New Zealanders give special tolerance to each other's presence and national values or identities. It is possible, though unlikely, that they do not notice each other's presence. This article supports its circumstantial argument

with indirect evidence such as rhetorical action from politicians across the political spectrum describing the relationship as special or 'familial'. It also demonstrates that these preferences for each other's presence have persisted as other important values in each national community – such as attitudes towards multiculturalism and relations with Pacific island societies – have diverged. These are an inadequate substitute for standardized surveys collected at regular intervals that measure Australians' and New Zealanders' attitudes towards one another and integration. These data should be collected in a format that is comparable with data collected in other regions such as the EU. Only such data can suggest whether and how integration processes shape the construction and evolution of identities.

A second limitation of the preceding analysis and post-functionalist explanations of European experience is their focus on the link between transnational people movements and politicization. The article shows that this mix of issues is less volatile politically in Australia and New Zealand than in Europe. But the argument says little about the potential for other issues to provoke resistance to integration in either place. In particular, it does not address whether the highly contentious issue of currency union was a necessary condition for the politicization of European integration proposed by post-functionalist explanations. This vexes the comparison with trans-Tasman integration, because New Zealand politicians, in particular, have avoided discussion of currency union with Australia. The preceding analysis cannot anticipate which other issues might create potential for contestation of integration. Nonetheless, it indicates clearly that we cannot understand such processes – and separate what is general from what is idiosyncratic – unless we compare integration processes. Because approaches to comparison in this field are still developing, one promising strategy is a comparison of integration processes in the concrete and temporal contexts in which they take place.

NOTES

[1] The Liberal Party, the National Party, the Liberal National Party of Queensland and the Country Liberal Party engage in a more or less permanent coalition and, for the purposes of this analysis, are treated as a single party.

[2] New Zealanders received a visa automatically that most were never aware of having.

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