

学術講演会

二つの北アメリカ国家

—カナダとアメリカの比較社会学—

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解説

1992年7月3日、社会学部学術講演会の講師として来学された現アメリカ社会学会会長セイモア M. リプセット博士は「二つの北アメリカ国家—カナダとアメリカの比較社会学」というテーマで講演された。そのテキストを英文のまま収録するに当たり若干の解説を加えておく。

民主主義（のため）の要件や社会主義に関して若い頃から強い興味を抱いていた政治社会学者リプセットは、マルクス主義の文献に現れる“American Exceptionalism”の謎解きに深い関心をもった。カナダにおける社会主義政党の展開を眼のあたりにした博士は、普通それほど差異がないと思われるカナダとアメリカの通俗的なイメージに疑問を感じ、アメリカにおいて社会主義（の運動や政党）が興隆しない理由を解き明かすためには、カナダとの精緻な比較社会学的分析が不可欠であると考えたのである。

カナダの社会主義運動については *Agrarian Socialism* (1950)、アメリカ社会の分析では *The First New Nation* (1963) を、さらに社会移動や民主主義の条件を考察した *Union Democracy* (1953)、*Political Man* (1960) を刊行し、その後さまざまな研究を重ねた結果、1990年にはこうした関心の集大成ともいべき *Continental Divide: The Values and Institutions of the United States and Canada* が完成する。今回の講演はそのエッセンスを紹介したもので、それは、一言でいえば、アメリカが〈革命〉の理念によって形成されたのに対してカナダは〈反革命〉の国として建設されたということである。封建的遺制のない新天地で〈革命〉の理念が花開くことによっていわば〈社会主義〉が先取されたのである。その具体的な内容については、私が「講演理解のためのメモ」として作成したカナダとアメリカの諸特徴を比較した表を参照していただきたい。

なお、リプセット博士は、アメリカ国内ではカリフォルニア大学（バークレー校）、ハーバード大学、スタンフォード大学（フーバー研究所主任研究員も兼務）で社会学や政治学の教授を歴任され、1990年からジョージメイソン大学へ移籍されたが、ポーランドのワルシャワ大学やベルリン自由大学などでも教鞭をとられ、1960年代初頭には京都夏期アメリカ研究セミナーの講師を務められた。（中野秀一郎）

	カナダ (1867—)	アメリカ (1776—)
アメリカ革命	反革命 王室、教会 エリート主義、貴族主義 保守主義 社会民主党的福祉国家	革命 個人主義、業績主義 民衆主義 自由主義
文学と神話	法と秩序 テレマコス (父親の探求) 敗北者	無法地帯 エディップス (父親の拒否) 勝利者
宗教	政教不分離 ローマカトリック 英国国教会	政教分離 組合教会主義 原理主義
法と逸脱	和平、秩序、良き政府 集团的権利 大きな政府、社会保障	自由、小さい国家 生命、自由、幸福の追求 個人的権利
成層構造	エリート主義、再分配主義 福祉国家	業績主義、犯罪、市場原理 競争的自由市場
モザイクと メルティングポット	個別主義、集団帰属 多文化主義 地方分権 人種、地方、原住民	普遍主義 アメリカ主義 中央集権

CANADA AND THE UNITED STATES COMPARED

SEYMOUR MARTIN LIPSET

Introduction

There is much to be gained, empirically and analytically, from a systematic comparative study of Canada and the United States. They share many ecological and demographic conditions, similar levels of economic development and social mobility, and have much in common culturally as well. However, there are consistent patterns of difference between the two.

The central argument of this essay is that Canada has been a more class aware, elitist, law-abiding, statist, collectivity-oriented, and particularistic (group-oriented) society than the United States, and that these fundamental distinctions stem in large part from the event which divided British North America, the American Revolution. The social effects of this division have subsequently been reflected in, and reinforced by variations in literature, religious traditions, political and legal institutions, and socio-economic structures between the two countries.

The Background

Given the contrasts between American and Canadian history, it is not surprising that the peoples of the two countries formed different self-conceptions. The American emphasis on individualism and achievement, crystallized in the Declaration of Independence, provided a basis for a populist format throughout subsequent American history. Canadians, having rejected the revolution, continued to define themselves by reference to what they are not-American—rather than in terms of their own national history and tradition. French-speaking Canada, largely under the leadership of Catholic clerics, isolated itself from the anti-clerical democratic values of the French Revolution.

The United States remained, through the nineteenth and early twentieth centuries, the extreme example of a classically liberal or Lockean society which rejected the alliance of throne and altar, ascriptive elitism, mercantilism, *noblesse oblige*, communitarianism. These values are precisely what Canadians sought to preserve by reacting against the liberal revolutions.

If early American history can be seen as a triumph of the more leftist Jeffersonian-Jacksonian tendencies, many Canadian historians and sociologists have emphasized the dominance of conservative forces north of the border until deep into the twentieth century. Canada was no more homogeneous politically than the United States, but its nineteenth century populist reform movements such as the Mackenzie and Papineau rebellions of the 1830s failed while equivalent groups or movements in the United States triumphed. The Founding Fathers who established the Dominion of Canada and drew up a constitution were pro-Empire Conservatives. As Frank Underhill summed up this Canadian history:

Our forefathers made the great refusal in 1776 when they declined to join the revolting American colonies. They made it again in 1812 when they repelled the American Invasion. They made it once again in 1837 when they . . . opted for a staid moderate respectable British Whiggism which they called "Responsible Government." They made it once more in 1867 when the separated British colonies joined to set up new nationality in order to pre-empt expansionism. . .

Patterns of emigration and immigration reinforced right-wing trends north of the border. Bourgeois, rationalist and Huguenot elements left Quebec after the British conquest, and conservative priests arrived from France in reaction adverse events there. In Anglophone Canada, most pro-

Revolution Congregational clergy moved to New England, and an estimated 50,000 Loyalists—including many Anglican priests—crossed the new border in the opposite direction.

Canada evolved gradually as an independent nation. The link with Britain inhibited the emergence of a distinctive Canadian identity. Until 1821 the constitution of the Canadian confederation was the British North America Act, written by Canadian leaders but enacted by the Parliament in London and proclaimed in 1867 by the Queen. Until the adoption of the Constitution Act of 1982, Canadians had to petition the British House of Commons for any amendment to their constitution. Before 1949, the ultimate court of appeals for Canada was the Privy Council of Great Britain. The 1978 Immigration Act gave Canadians a distinct citizenship for the first time, and not until 1980 did “O Canada” replace “God Save The Queen” as the national anthem. Toryism remained an enduring influence. As Reg Whitaker points out:

Toryism was not . . . an economic doctrine masquerading as a philosophy. . . . The emphasis on *control* of the processes of national development, the element of the collective will of the dominant class expressed through the public institutions of the state, . . . was crucially relevant to . . . a frontier colony struggling on the fringes of a growing economic and political power to the south.

Some of the scholars who see Canada as a more British or European-type conservative society stress that the values inherent in Tory conservatism give rise to support for social democratic redistributive and welfare policies. Gad Horowitz notes that “socialism has more in common with Toryism than with [classical] liberalism, for liberalism is possessive individualism, while socialism and Toryism are variants of collectivism.” A dominant *laissez-faire* Lockean tradition is antithetical to such programs.

Other analysts correctly point to the need to consider also the impact of variations in the ecology, demography, and geography of the two nations. Canada controls an area which, though larger than the United States, is much less hospitable in terms of climate and resources. Its greater size, smaller population base, and fear of an American takeover have reinforced a Tory statist tradition of direct

government involvement in the economy. South of the border, the anti-statist, classically liberal revolutionary ideology was not challenged by the need for state intervention to protect the nation's independence against a powerful neighbor.

A comparison of the frontier experiences of the two countries encapsulates the ways in which values and structural factors have interacted to produce different outcomes. Since Canada was on constant guard against American expansionism, it could not leave its frontier communities unprotected or autonomous. Law and order in the form of the centrally-controlled North West Mounted Police accompanied settlers into the Canadian frontier, which contributed to a deeper respect for the institutions of law and order on the Canadian frontier. South of the border, frontier lawlessness epitomized American individualism and disrespect for authority.

The diffusion of values through rapid transportation and almost instantaneous communication are promoting a common Western culture. National differences, however, continue. As journalist Richard Gwyn writes, Canadians have become “a quite distinct kind of North American. . . . utterly unlike [those in the United States] in their political cultures so that they are as distinct from each other as are the Germans from the French, say, even though both are European just as Canadians and Americans are both North Americans.”

The debate as to the sources and nature of the differences continues. The cultural (values) and structuralist approaches are not mutually exclusive frameworks. Harold Innis, Canada's leading economic historian, although emphasizing structural factors in his discussion of cross-national variations, also noted the importance of “the essentially counter-revolutionary traditions, represented by the United Empire Loyalists and by the Church in French Canada, which escaped the influences of the French Revolution.”

Literature and Myths

Northrop Frye has argued that “a culture founded on a revolutionary tradition, like that of the United States, is bound to show very different assumptions and imaginative patterns from those of a culture that rejects or distrusts revolution.”

Many literary critics have pursued the revolution-counterrevolution theme in their comparative analyses of North American literatures. Margaret Atwood has stressed the difference in the way the two societies look at authority. She points out that unlike Americans, Canadians do not see authority or government as an enemy. Rebels or revolutionists are not heroes in Canadian literature.

Literary critic Russell Brown agrees that the variations in national literatures stem from “crucial differences between American and Canadian societies. . . .” Thus, south of the border, novels emphasize rejection of the father by the sons, much as the Americans overthrew the British King, i. e., they are Oedipal. Canadian writing, on the other hand, reflects the story of Telemachus. Telemachus' problem is that “the King, his father, has departed, has left him to grow up fatherless in his mother's home for reasons he cannot fully grasp. . . .” Hence he sets out in the *Odyssey* to find his father. Brown cites various Canadian novels as reflecting the Telemachus syndrome, including Hugh MacLennan's *Each Man's Son*, Robert Kroetsch's *Badlands*, and Margaret Laurence's *Diviners*.

Mary Jean Green, an American student of Quebec literature, while pointing to the same content differences, suggests that the family tension myth north of the border reflects the stress of the mother-daughter relationship rather than the father-son one. The theme of many recent novels in both Anglophone and Francophone Canada has been the feminine one “of rejection and reconciliation,” resembling Canada's relationship to Britain, not the more masculine sharp break, found in American fiction, which corresponds to the American revolutionary overthrow of British rule. She suggests that one reason that women are much more prevalent among Canadian authors than among American writers is that Canadian fiction is more likely to involve feminine themes.

Canadian novelist Hugh MacLennan contends that Canadian literary culture reflects the fact that its three founding nationalities, the English, the French and the Scots, are defeated peoples: the English by the Americans, and the French and Jacobite Scots by the English. Atwood notes that the heroes of Canadian novels “survive, but just barely. They are born losers failing to do anything but keep

alive.”

A similar point has been made about English Canadian motion pictures. Robert Fothergill argues that film content points to a “sense of limitation and inadequacy experienced half-consciously by Canadians in their real lives, “to a “defeatist fantasy.” Geoff Pevere finds that Fothergill's thesis helps “to account for the losers roaming around Canadian film. “He also notes the “persistent proliferation of outsiders as heroes in Canadian movies. . . . And unlike the romantic American version of the outlaw. . . the Canadian outcast is defined by his being less and not greater than those communities that have rejected him.”

A. J. M. Smith and Ronald Sutherland call attention to the recent effects of a new nationalism north of the border which is producing more radical writing. But, ironically, as Sutherland points out, these changes are making Canada and its fiction more American, involving a greater emphasis on values such as pride in country, self-reliance, individualism, independence, and self-confidence. This new nationalism, often, linked among intellectuals to socialism and Toryism, seeks to resist American takeover of Canada's economy and increased cultural and media influence by the traditional Canadian remedy of state intervention.

Religion

Harold Innis wrote that a “counter-revolutionary tradition implies an emphasis on ecclesiasticism.” Historically, the majority of Canadians have adhered to the Roman Catholic or Anglican churches, both of which are hierarchically organized and, until recently, had a strong relationship to the state. As student of religion John Webster Grant notes,

Canada has never succeeded in drawing with any precision a line between areas in which the state has a legitimate interest and those that ought to be left to the voluntary activities of the churches. . . few Canadians find “the separation of Church and State” an acceptable description of their situation or of their ideal for it.

Both the Roman Catholic Church and the Church of England, traditional state churches, endorsed established political and social orders up to the post World War II era. Hence one found mutually

reinforcing conservative forces at the summits of the class, church and political structures. The Anglican Church has declined greatly in modern times, with the ecumenical United Church, formed from a union of Methodists, Congregationalists and Presbyterians, emerging as the largest Protestant denomination.

On the other hand, American tradition and law emphasize separation of church and state. A large majority of Americans belong to "non-conformist" Protestant sects which opposed the established state church in England. These groups have a congregational structure, and promote the concept of a personal relationship with God. Tocqueville pointed out that all American denominations are minorities, and hence have an interest in liberty and a weak state.

Just as religious practices and institutions can reinforce general value orientations prevalent in a national community, so too can the latter influence the former, as is demonstrated in a comparative study of the Catholic Church in North America. Sociologist Kenneth Westhues suggests that there has been an "acceptance by the American Church of the role of voluntary association. . ." Thus, the Catholic Church in the United States has taken over many of the characteristics of Protestantism, including a strong emphasis on individual moralism. As a result, the Vatican has frowned somewhat on the American Church and has, in fact, not treated it as well as the Canadian affiliate in terms of honors, e. g., number of cardinals and saints.

Religion in both countries has become more secularized in tandem with increased urbanism and education. Canadian Catholicism in Quebec had modified the nature of its corporatist commitment from a link to agrarian and elitist anti-industrial values to a tie to leftist socialist beliefs. Public opinion research suggests that Francophone Catholics have given up much of their commitment to Jansenist puritanical values, especially as they affect sexual behavior and family size. Similar trends as observable within the other two major Canadian denominations, the Anglican and the United Church. Secularizing trends, although generally observable in both countries, have been less noticeable in the United States, particularly among evangelical Protestants, who are very much stronger south of the border than in the north.

Americans, according to data from sample surveys, are more likely to attend church regularly than Canadians, and to adhere to fundamentalist beliefs. There is a consistent pattern in these data: Americans far outnumber Canadians generally in giving expression to such sentiments, with Anglophones more likely to hold such views than Francophones. Congruent with the variation in religious practice and belief, Americans appears to be more puritanical than Canadians, with Francophones the most tolerant with respect to sexual behavior.

Law and Deviance

The concern of Canada's Founding Fathers with "Peace, Order, and Good Government" in their preamble to the 1867 Constitution implies control of and protection for the society. The parallel stress by America's Founding Fathers on "Life, Liberty, and the Pursuit of Happiness" suggests upholding the rights of the individual. The American commitment to personal rights, including those of political dissidents and people accused of crime, is inherent in the "due process" model, involving various constitutional inhibitions on the power of the police and prosecutors. The "crime control" model, more dominant in Canada and Europe, emphasizes the maintenance of law and order, and is less protective of the rights of the accused and of individuals generally.

The lesser respect and deference accorded to the law in the United States are inherent in a system which values egalitarianism and lacks diffuse elitism. The greater lawlessness and corruption in America may also be attributed in part to a greater emphasis on achievement. As Robert Merton has noted, achievement orientation means that " (t) he moral mandate to achieve success thus exerts pressure to succeed, by fair means if possible and by foul means if necessary."

Americans are more prone than Canadians to commit violent offenses like murder, robbery, and rape and to be arrested for the use of illegal drugs such as opiates and cocaine. For example, in 1987, the murder rate for Canada was 2.5 per 100,000 population, in the United States it was 8.3. The United States not only has a much higher rate of homicide than Canada, it also has a considerably higher level of political violence.

The lower rates of crime and violence in Canada are accompanied by a greater respect for police and a higher level of support for gun control legislation. In the United States, gun ownership has been regarded as a “right” linked to a constitutional guarantee established to protect citizens against the state. Canadian policy is based on the belief that “ownership of offensive weapons or guns is a privilege, not a right,” and the latter possesses far fewer arms than the former.

Canada has been involved during the 1980s in a process of changing its fundamental rules. The adoption of a comprehensive Charter of Rights and Freedoms in the new Constitution of 1982 was designed to create a basis, absent from the British North America Act, for judicial intervention to protect individual rights and civil liberties, one which Canadian courts have actively begun to practice. The Charter, however, is not the American Bill of Rights. While placing many comparable restrictions on government action, it still is not as protective of individuals accused of crime. For example, as sociologist Edgar Friedenberg has noted:

The American Bill of Rights provides no person shall “for the same offense be twice put in jeopardy of his life or limb.” A similar provision under Section 10 (h) of the Canadian Charter of Rights and Freedoms is made ineffective in preventing. . . “double jeopardy” by the [provision that] the process is not considered final till the Crown has exhausted its rights to appeal [an acquittal]

Canadian law under the Charter still retains some of the traditional Canadian emphasis in favor of collective (group) rights. The 1867 Constitution had provisions protecting specific linguistic and religious minorities. The Charter protects many individual rights, but “the collective rights of minorities. . .” continue to enjoy pre-eminence. These include aboriginal rights to sexual equality. The Charter also explicitly authorizes affirmative action programs. Although the Constitution permits individual rights to be overridden by Parliament or provincial legislatures, group rights may not.

Not surprisingly, analyses of variations between the Canadian and American economies can be distinguished based on whether they stress structural or cultural factors. The structural ex-

planation of North American affluence emphasizes the advantages possessed by settlers occupying a continent open to development, with enormous agricultural, animal, and mineral resources. Within this shared context, the greater size of the American market has given business in the United States a considerable advantage compared to that in Canada.

The cultural interpretation, by contrast, points to the congruence noted by Max Weber between the Protestant sectarian and the capitalist ethos, reflected in the presence of a more hardworking capital-maximizing population south of the border. Canada, as noted earlier, has been less Protestant sectarian than American and, consistent with Weber's thesis, has developed more slowly. The Weberian logic also suggests that Quebec and the American South were economically less advanced because of Catholicism in Quebec and slavery in the American South, and their residues in values and structures. Friedrich Engels, recording his impressions of a brief visit to North America in 1888, emphasized the sharp variation between the “spirit of the Americans” and that of the Canadians. He noted that north of the border,

one imagines that one is in Europe again, and then one thinks that one is in a positively retrogressing and decaying country. Here one sees how necessary the *feverish speculative spirit* of the Americans is for the rapid development of a new country.

and pointed to the “economic necessity for an infusion of Yankee blood” for Canada to grow.

The nature of Canadian society has affected the way her citizens have done business. Historical and recent survey evidence indicates Canadian entrepreneurs have been less aggressive, less innovating, and less risk taking than American. The Science Council of Canada, assessing impediments to innovation, emphasized the “prudence” of Canadian as a major obstacle. Data drawn from opinion polls reinforce observations about Canadian economic prudence. They suggest that Americans are more likely than Canadians to express attitudes reflecting greater absorption of the values of the business industrial system. Canadians are somewhat more hostile than Americans to private enterprise.

Canadians have been much more disposed than

Americans to call on the state to handle economic and other matters. The Tory orientation and the smaller population relative to land mass north of the border have meant a larger role for the state in the Canadian economy since Confederation. As of 1987, the proportion of Canadian GDP in government hands was 47 percent, compared to 37 percent in the United States. Moreover, while there is some government ownership of industry in both countries, it has been much more common in Canada. According to John Meece and Michael Goldberg, in Canada, "of 400 top industrial firms, 25 were controlled by the federal or provincial government. . . (F) or financial institution 9 out of the top 25 were federally or provincially owned or controlled. . ." While below the norm for OECD countries, Canadian subsidies to business and employment in public enterprise were five times the level of those in the United States during the seventies.

Similar variations occur with respect to welfare policies. Robert Kudrle and Theodore Marmor conclude that specific welfare policies were adopted earlier in Canada than in America, and tend to be "more advanced in terms of program development, coverage and benefits." Seeking to account for these variations, they stress ideological differences: "In every policy area it appears that general public as well as elite opinion. . . [has been] more supportive of state action in Canada than in the United States."

Differences related to party affiliation in both countries also emphasize the cross-national variations. Canada has an electorally viable social democratic party, the New Democratic Party (NDP), reflecting in part the strength of the Tory-statist tradition and the stronger collectivity orientation north of the border. Summarizing surveys of high level civil servants and federal, state and provincial legislators, Canadian political scientist Robert Presthus shows that during the 1970s, Canadian Liberal legislators scored much higher than American Democrats on economic liberalism, and Canadian Conservatives were much higher than Republicans. Conservatives and Republicans in each country were lower in economic liberalism than liberals and Democrats, but Canadian Conservatives were higher than American Democrats.

Stratification

Much of the comparative discussion of North America refers implicitly, if not explicitly, to variations in stratification, patterns of class sentiments, hierarchy, and inequality. Goldberg and Mercer conclude that "Canadians are much more tolerant of ruling elites and oligarchs than Americans." In a study of two communities situated on different sides of the border, sociologists Craig Crawford and James Curtis report that Americans are lower than Canadians on an elite orientation scale, and higher on achievement orientation. Neil Guppy, another Canadian sociologist, has studied the degree of consensus across the social hierarchy with respect to the prestige rankings given to different occupations by cross-national samples. He concludes that the evidence supports the argument that "in the United States less emphasis is placed on hierarchical patterns of deference."

Cross-national polls conducted over the last 15 years point to strong and continuing difference between Americans and Canadians on support for meritocracy in contrast to equality of result. Therefore, it is not surprising that Americans being more achievement oriented, have placed more emphasis than Canadians on education as the primary mechanism for social mobility, whereas the northern country has been more engaged in redistributive policies. The differences between the Tory/social democratic elitist tradition and the classically liberal, laissez-faire populist one are reflected in the greater emphasis on state supported welfare and group equality in the north. Canada has been much less divided than the United States on a parliamentary level over efforts to foster government health care or affirmative action policies for minorities and women.

Canada resembles Britain in recruiting her business and political administrative elites disproportionately from those without a professional or technical education. Studies of business leaders reveal that the Canadians not only have less specialized education than the Americans, but also that the former are much more likely to have an elitist social background. As of the mid seventies, 61 percent of the Canadian top executives were of upper class origin compared to 36 percent of the

Americans. Similar results were reported for top civil servants in studies done during the late sixties and the seventies.

These findings on stratification and elite behavior are relevant to the cross-national variation in trade union strength and the presence or absence of electorally viable socialist or social democratic parties. While Canada falls behind Europe on both items, its trade union movement has encompassed a significantly larger proportion of the non-agricultural labor force than has the American one for most of the years from 1918 to the present (35 to 17 percent as of the end of the eighties). Canadian labor officials moreover, repeatedly endorsed the principle of independent labor political action from the turn of the century on, and were much more favorable to state intervention than the American union leaders. Although the great majority of Canadian and American trade unionists once belonged to the same international unions, and 40 percent of the northerners still do, the affiliates in the two countries have varied ideologically in ways which reflect the diverse national traditions.

The American social structure and values foster a free market and competitive individualism, an orientation which is not congruent with class consciousness, support for socialist or social democratic parties, or a strong trade union movement. The country changed during the Great Depression, which introduced a "social democratic tinge" into American party politics in the form of New Deal welfare and planning policies. But evidence from election results (seven Republican victories in the ten Presidential elections held from 1952 on) and the findings of opinion polls suggest that the post-war economic prosperity has given Americans renewed faith in their country as an open meritocratic society. Support for statism, nationalization of various industries, and socialism have declined. Trade union membership has also fallen from 1955 to the present, down from one-third of the employed non-agricultural labor force to a sixth, as of 1990.

In contrast to the American experience, the post-war economic boom did not precipitate a return to the values of classical liberalism in Canada because they have never constituted the national tradition north of the border. All Canadian political parties, including the now-governing Tories, remain committed to an activist welfare

state. Prime Minister Brian Mulroney has referred to it as "our sacred trust." In spite of improved economic conditions, Canadian socialism has held its own nationally, generally obtaining between a fifth and a quarter of the vote in English Canada, and securing 43 seats in the House of Commons in the 1988 elections, the highest yet. Social democracy gained a new bastion in French Canada with the rise of the *Parti Quebecois*, which has been the government or main opposition party since the 1970s.

Mosaic and Melting Pot: Center and Periphery

Canada's particularism, emphasizing group affiliations, as opposed to American universalism, is reflected in (a) the Canadian concept of the "mosaic" applied to the right to cultural survival of ethnic groups, as compared to the American notion of the "melting pot"; (b) the more frequent recurrence and survival of strong regionally based third parties in Canada than in the United States; and (c) the greater strength of provinces within the Canadian union, compared to the relative weakness of the states and the nationalization of parties, i. e., the decline of regionalism, in America.

The greater support for the perpetuation of minority cultures in Canada, derivative from the founding commitment to guarantee the rights of the Francophones and Catholics, has affected groups as diverse as the native populations, Jews, and Mennonites. The 1982 Charter of Rights and Freedoms explicitly singles out "the Indian, Inuit and Metis peoples of Canada" for special protection and guarantees aboriginal treaty rights. The Canadian aboriginal communities, larger in size and supported by the values implicit in multiculturalism, have done better than their American counterparts.

The Canadian Jews are much better organized than their American co-religionists. A single national organization, the Canadian Jewish Congress, represents all Jews in Canada, there is no comparable group in the United States. The small size of the Jewish community in Canada should have led to greater assimilation, but the emphasis on particularistic group organization subsumed in the mosaic seemingly helps to perpetuate a more solidaristic Canadian Jewish community.

The two North American countries are more disparate than before with respect to the importance of the federal and state and provincial governments; the power of the latter have steadily declined in the United States, but have increased in Canada. An American political scientist, Samuel Beer, has asserted that political and economic modernization inherently lead to a growth in authority at the center and a reduction in state and provincial power, and cites the United States as an example of this process. But in Canada, as Donald Smiley points out, "modernization had not led to centralization in the... federal system but rather to the power, assertiveness, and the competence of the provinces. Furthermore, the provinces where modernization has proceeded most rapidly are the most insistent about preserving and extending their autonomy."

The differences between the two countries in this respect show up strikingly in government revenue. While American federal authorities control most of the funds raised and spent by state and local governments, in fiscal terms Canada is a highly decentralized federation: the provinces and municipalities exceed the federal government in total spending and tax revenue. As of 1985, the federal share of total Canadian tax revenue, not including social security funds, was 47.6 percent; the equivalent figure for the United States was 56.3 percent.

Canadian provinces have also been more disposed than American states to challenge the power of the federal government. Movements advocating secession have recurred in this century not only in Quebec, but in part of the Maritimes, the Prairies, and British Columbia as well. Public sentiment in Canada remains much more territorial than in the United States.

The discrepancy between the experience of the two countries has led social scientists to ask what has accounted for these contradictory developments. Two variables appear to be most important. One is the role of the French Canadians. Smaller Anglophone provinces, seeking to protect their autonomy, have been able to do so because Quebec has always been in the forefront of the struggle for greater provincial power. The other is the effect of the difference between the American Presidential-Congressional system and the British Parliamentary model. The greater propensity of

Canadian provinces to engage in recurrent struggles with the federal government and to generate third parties may be explained by the fact that regional interests are much less well protected in Parliament than in Congress. Given the different consequences between the national party discipline imposed by a parliamentary as compared with the American divided powers presidential system (which permits members of Congress to vote against their party leaders, including the President), Canadians are forced to find a way of expressing their special regional or other group needs outside of the House of Commons. The Canadian solution has frequently been to support different on a provincial level from those which they back nationally, so that provincial governments may carry out the regional representation tasks which in the United States are fulfilled by cross-party Congressional interest blocs.

Conclusion

There can be little doubt that, regardless of how much emphasis is placed on structural or cultural factors in accounting for variations, Canada and the United States continue to differ considerably. Since World War II, substantial changes in economic productivity, in urbanization, in education and in rates of upward social mobility have indeed reduced the structural gap. But there has been no consistent decline in the pattern of differences in behavior and values. Significant dissimilarities remain across the border with respect to a broad range of societal conditions. These variations in values and behavior can be linked to different reactions to the American Revolution.

The United States and Canada remain two nations formed around different organizing principles. Although some will disagree, there can be no argument. As Margaret Atwood concludes: "Americans and Canadians are not the same, they are products of two very different histories, two very different situations."

Further Reading

Keith G. Banting, ed., *State and Society: Canada in Comparative Perspective* (Toronto: University of Toronto Press, 1986).

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