Chapter 1
Introduction: Understanding Migration Controls in Europe

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1.1 From Models of Migration Control to Migration Control Regimes

Migration control has largely dominated the public and political debate on immigration since the beginning of the 1990s. In particular, the mismatch between the restrictionist goals and the expansionist outcomes of migration control policies has captured the attention of the public as well as academia (Cornelius et al., 1994; Joppke, 1999; Joppke & Guiraudon, 2001). The presence of a large number of politically unwanted migrants (in the form of asylum seekers and irregular migrants) in Western European states despite increasing barriers and controls certainly represented the most evident example of such a contradiction.

The research interest in the mechanisms of migration controls and their outcomes has led to two distinct types of literature. On the theoretical level, researchers have focused on the limits of what migration controls can achieve, addressing the power of liberal constraints (e.g. through the action of domestic institutions), international norms, organised interests and, more generally, the role played by different types of actors and venues in the field of migration policy (Hollifield, 1992; Soysal, 1994; Freeman, 1994; Jacobson, 1996; Joppke, 1998; Guiraudon, 2002; Lahav & Guiraudon, 2006; Castles, 2004a, b; Boswell, 2007). On the empirical level, the question of migration controls led to a large number of comparative studies in Europe and overseas, where researchers' attention focused on the similarities and differences of Western European countries' policy performance, and, in particular,

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on the question of whether some countries were more effective than others in controlling migration. Although a relevant strand of literature has focused on convergence trends between the two sides of the Atlantic (Hollifield et al., 2014; Widgren, 1994; Papademetriou & Sumption, 2011; Finotelli & Kolb, 2017), the large majority of studies have identified different models of immigration control; these models were considered the result of different types of migration histories, different political contexts and different levels of policy efficacy (Miles & Thränhardt, 1995; Freeman, 1995; Brochmann & Hammar, 1999; Martin & Miller, 2000; Boswell, 2003). In general, the empirical comparison of migration control in Western countries has been framed in terms of divergence, "efficacy gaps" (Czaika & de Haas 2013) and policy models.

Especially in Europe, these classifications have been defined by more or less developed asylum traditions, more or less exposed borders, or more or less experience in immigration when sorting countries of immigration in terms of state regulation capacity. In such a context, attention turned quickly to Southern European immigration countries, which had become new immigration countries and the new "guardians" of the European border in the space of a very short time (Baldwin-Edwards & Arango, 1999; King et al., 2000; González Enríquez & Triandafyllidou, 2009; Ambrosini & Triandafyllidou, 2011; Peixoto et al., 2012). They were considered latecomers that had to manage unexpected flows on the fly without a clear immigration model. They appeared to be both more exposed to and less able to deal with the challenge of unwanted migration flows than other European countries. In this context, the idea of a "Southern European model" of migration started to gain ground in the mid-1990s, driven by the conviction that the capacity to control migration was defined by a European divide on immigration between "strong" Northern and "weak" Southern countries in Europe (Freeman, 1995; Baldwin-Edwards, 1997). Since then, the North-South divide in immigration control policies has been a persisting feature of the migration debate, which has contributed to forge a "negative exceptionality" of the Southern European countries in comparison with the rest of Europe, and which still underpins the political and academic debate over immigration control.

The persisting relevance of the European North-South divide in migration studies points to a widespread understanding of migration control outcomes in Europe as simply the result of more or less effective state policies. Yet, are national models of immigration based on perceived national divides an adequate heuristic tool to grasp the complexity of migration control policies and their outcomes in Europe? And from a more empirical perspective, can we really understand migration control outcomes of European countries as the result of more or less effective policies? Even when so, by what rationales should we assess state effectiveness? The number of unplanned entries and irregular migrants as well the prevention of secondary movements or the ability to meet economic and social demands? More generally, can European countries, having different economies, institutional cultures and geopolitical positions, reasonably pursue shared policy goals in terms of migration controls – and adopt similar means to achieve them?

The goal of this book is to contribute to the current literature by showing that the understanding of migration controls and their outcomes requires going beyond the juxtaposition of more or less effective state policies and clear-cut national models. We intend to overcome the tendency to develop country-based typologies (Boucher & Gest, 2015) that over the last few decades have turned Europe's traditional destination countries into benchmarks against which other countries are compared, with the risk of grouping the outliers into a single cluster and subsequently framing dissimilarities as pitfalls, as has occurred in the case of Southern Europe (Ponzo, 2021). This does not imply denying differences among European countries. If anything, it implies the very opposite: we argue that structural differences in institutional and welfare cultures, economic dynamics and geopolitical positions play crucial roles in the way countries regulate and conceptualise immigration (Bommes & Geddes, 2000; Bommes & Thränhardt, 2012). From this perspective, it becomes clear that the policy goals and tools developed by European countries in the field of migration control cannot be understood and compared outside of this context. Migration controls are not regarded as the mere outcome of rational planning and, even less of state efficacy but rather as an imperative deeply embedded in a dynamic interplay of internal structural constraints, different geopolitical and economic interests, and ever-changing external context.[1]

Starting from this assumption, we employ the concept of regimes, which we regard as better able to grasp the complex reality of migration policy. Nation-states, according to the regime concept, are conceived as political organisations with different welfare cultures, institutional traditions and regulation frameworks that respond to a number of functional imperatives (e.g. security, equity, institutional legitimacy etc...) (Bommes, 1999; Boswell, 2007). They include different types of organisations, with different logics; these organisations such as state ministries and agencies interact with other social systems, such as the economy, but also other states. That is why the notion of a migration regime allows scholars to understand migration control policies not as the consequence of "bad" or "good" political wills but rather as embedded, negotiated outcomes of multiple actors and organisations with different interests and different functioning logics. Against this backdrop, the concept of regime

> brings to attention the effects of norms in contexts, rather than operating a simple review of juridical rules.…[A] country's migration regime is usually not the outcome of consistent planning. It is rather a mix of implicit conceptual frames, generations of turf wars among bureaucracies and waves after waves of "quick fix" to emergencies, triggered by changing

[1] A similar effort could be done in the field of migrant integration where the adoption of the concept of regime could produce equally fruitful results. Still, in this volume we have prioritised migration controls given that the contestation of the North-South divide and "national models" (eg. the French assimilationist, the British and Dutch multiculturalism, the German ethnocentrism) appears more advanced with regard to migrant integration where several scholars have looked at different types of actors, strategies and structural constraints conceiving of national models as mere discursive frameworks (Baldwin-Edwards, 2012; Bertossi, 2011; Cebolla-Boado & Finotelli, 2015; Favell, 2004; Fellini, 2018; Garcés-Mascareñas & Penninx, 2016; Giugni et al., 2005; Ponzo, 2021; Finotelli & Ponzo, 2018; Schain, 2009).

> constellations of actors. The notion of a migration regime allows room for gaps, ambiguities and outright strains: the life of a regime is the result of continuous repair work through practices. (Sciortino, 2004: 32–33)

The concept of regime makes it possible to understand migration policies not only in terms of goals and outcomes, as often conceived in the migration control literature, but also as a process "through which public and private bodies, as well as decision-makers and administrative agencies, can coordinate (or at least try to coordinate) their expectations and produce and carry out governing decisions" (Cvajner et al., 2018: 13). In such a process, national models lose their explanation function and are seen "as loose discursive frameworks actors may use to make sense of the problems at hand and to locate themselves in relation to others" (*ibid*.).

Taking this approach to study migration controls allows us to unravel the policy practices and organisational strategies of different components of migration regimes, thus enabling us to understand their actual functioning while going beyond national-based typologies. Specifically, the authors in this volume conceive of control outcomes as the intended (and unintended) results of strategies pursued by a wide range of public and private actors. Against this backdrop, states are just a few actors among many, and they have to deal with different interests, such as geopolitical or economic priorities, as well as with established routines, compelling public expectations, and a tangle of formal and informal rules.

Given that interests, public expectations and rules are not geographically blind, the differences between the North and South of Europe cannot be disregarded. Leaving aside the diverse history, we cannot consider geographical position as simply a minor inconvenience with no bearing on the issue at hand. Territorial location shapes migration regimes both directly, by producing different levels of exposure to different migration flows at different points in time, and indirectly, by shaping international relations, trade agreements, security priorities, etc. that in turn impact immigration policies. Hence, our aim is not to deny the existence of any difference between Northern and Southern European countries. Instead, we attempt to reframe those differences making sense of them instead of reducing them to Southern Europe's pitfalls or a lack of Europeanisation.

We intend that states' control imperatives are embedded in a complex interplay of varying geopolitical and economic interests, and internal and external constraints. More precisely, we focus on the imperative of border controls, internal checks, and residence regulations that we assume is present in all European countries. On the one hand, this common imperative might push states towards policy convergence; on the other hand, different geopolitical and economic priorities as well as different internal structures (e.g. welfare structures or institutional settings) might lead to the persistence or emergence of policy divergence among European countries. Consequently, it becomes impossible to draw clear-cut dividing lines across the continent.

This theoretical perspective brings about practical implications as well. Avoiding oversimplification and accurately framing those differences should prevent defining common policy goals and tools where there is no ground for them. At the same time,

this reframing allows us to highlight the fact that convergence among Western European countries might be more advanced than suggested by the ongoing European-level political disputes around migration and asylum: this book points out the blurring of boundaries of "national" migration regimes and shows how similarities in specific domains of immigration policy (e.g. labour migration, external controls, internal controls, asylum, etc.) among European states might prevail over internal consistency of individual countries' overall immigration regime.

Finally, this volume speaks to the Europeanisation debate. First, we take a different stance upon Europeanisation that, as the book chapters make clear, appears as a hybridisation of strategies, logics of action, and practices rather than either the top-down adoption of common regulations issued by EU-level entities or horizontal convergence among clear-cut national approaches. Second, we highlight how Southern European countries are taking on a new role in this process, turning from students to teachers. Policies of traditional immigration countries constituted the initial blueprint for EU legislation in this field (Boswell & Geddes, 2011; Post & Niemann, 2007; Zaun, 2017), whereas Southern European countries were generally portrayed as passive receivers and dysfunctional implementers of EU norms and standards. However, on the ground, the differences are less cut and dry, and we can observe a sort of "Southernisation" of models, where Southern European countries have to some extent inspired EU's more recent approaches, especially with regard to external controls and asylum.

The last finding is a picture of how Europe really works in the field of migration, exposing and countering a double myth: not only that of a North-South divide, but that of "national models" of migration control. In this vein, the book responds to the need to reassess and give nuance to the (mis)conception of a neatly divided and clustered Europe, thus contributing to a proper understanding of the migration panorama, and to adopting appropriate policy strategies.

1.2 The North-South Divide as the Undying European Cleavage

Europe's North-South divide in migration policies has appeared as the analytical opposition *par excellence* in the European migration panorama. The rhetoric of the North-South divide has been present in a good deal of the recent European migration history. Until the 1980s, it referred to the existence of two different migration realities, i.e. emigration countries in Southern Europe, and traditional destination countries for labour migrants in Central and Northern Europe (Castles & Kosack, 1973; Miller, 1981).

In the 1990s, the suppression of internal borders after the enforcement of the Schengen Agreement and the creation of a common external border marked a turning point in the definition of the North-South divide. Since then, countries in Southern Europe have been the target of endless pressure to reinforce their borders

(which had become European borders) as well as of repeated accusations of not being up to the task.

With the first European migration crisis, triggered by the breakdown of the Soviet Union, the idea of a North-South divide also began to be applied to the control of intra-EU movements, especially of asylum seekers, and Southern European countries started to be accused of promoting the transit of unwanted secondary flows to Northern migration countries. The argument was that asylum seekers who had arrived in Southern Europe decided to move towards Northern European Member States, where they expected more generous welfare benefits and fairer asylum procedures (Efionayi-Mäder et al., 2001; Thränhardt, 2003).

The Southern European countries' reputation as shrewd transit countries went along with the one of incubators of irregular migration, with a tolerant civic culture towards law breaking, plenty of opportunities offered in the informal economy, and frequent regularisation processes. Such a contrast with the Northern European "asylum magnets" triggered the perception of asymmetric migration regimes in Europe. While Northern European countries were seen as traditional destinations for asylum seekers, Southern European countries were considered the main destinations for economic migrants, whose irregular employment was facilitated by a large informal sector of the economy and weak internal controls (Santel, 1995; Finotelli, 2009; Echeverría, 2020).

With the 2008 Great Recession, the idea of the North-South divide was extended to intra-EU mobility. It revived the perception of Southern European states as sources of emigrants, often regarded as welfare scroungers. Concerned by the substantial increase of inflows from the disrupted economies of Southern Europe, some Northern European countries restricted access to social rights of EU citizens in an effort to promote the return of those EU foreign citizens without employment who were dependent on welfare (Lafleur & Stanek, 2017).

The refugee crisis of 2015 reinvigorated the image of Southern European countries as ports of entry to Europe. Media images of obsolete and overcrowded reception structures in Italy and Greece suggested that Southern European countries were still ill-prepared to face the new migration challenge. On the other hand, the crisis refuelled the political resentment of Southern European Member States for having been turned into the "guardians" of the common European border, receiving only some economic and technical support from the European Union and their Northern European counterparts without any real responsibility-sharing.

The crisis of 2015 showed that the perception of the North-South divide in immigration was still alive and kicking in Europe, where Southern European countries appeared as Europe's soft underbelly in contrast not only to Northern Europe, but even to Eastern Europe, an area often described as merciless. Indeed, the tough approach of new Member States has further fostered the idea that migration control does not depend on experience in the field, but rather on political will – which is lacking in Southern Europe. Therefore, if the tough migration policies of the Eastern countries had prevented an East-West divide to rise to prominence in the scientific

and public debate on immigration control for third-country nationals,[2] they might have exacerbated the North-South divide and further increased the blame on the Southern countries.

Finally, in the face of the coronavirus pandemic, the urgency to ensure a migrant labour supply entered the public debate at the very first stage of the health crisis. The European Commission tried to ensure common guidelines through the adoption of a common list of "critical workers" that had to be granted freedom of movement across EU internal borders and the opening of "green lanes" for agricultural workers within the European Union. In general, Member States' responses somewhat converged. However, there were exceptions that, even if not framed as such in the public debate, essentially corresponded to the North-South divide. For example, three countries in Europe dealt with the pandemic by adopting large-scale regularisation or by clearing out huge backlogs of individual regularisation applications through mass positive resolutions: Italy, Portugal and Greece (OECD, 2021).

Similarly, the refugees fleeing from Ukraine seem to have stimulated a similar reaction in terms of migration controls among Member States, also thanks to the application of the Temporary Protection Directive. Actually, a deeper look suggests that a North-South divide might soon re-emerge, although not in the form of Southern toleration and Northern rigour in border controls. Indeed, Northern European countries, such as Germany, have taken the opportunity to actively attract and recruit Ukrainians who are regarded as a much-needed skilled labour force – as happened with Syrians during the 2015 refugee crisis. Instead, Southern European countries like Italy, although hosting a larger Ukraine diaspora, are not actively taking advantage of this asset and the current contingency to fill the relevant labour shortages.[3]

This brief excursus suffices to show that rethinking the North-South divide is necessary not only for the theoretical reasons explained in the previous section, but also because successive major crises – the Great Recession, the European refugee crisis, the pandemic, and the Ukraine war – have impacted European immigration policies in the new millennium and the diverse responses to these crises require a correction to the usual frames of interpretation.

[2] In fact, though Eastern European countries are new Member States and recent immigration countries, the East-West divide and the North-South divide represented two different "axes of contention" (Hampshire, 2016). While the North-South controversy mostly concerned unwanted migrants from third countries (Freeman, 1995; Baldwin-Edwards, 1997), the East-West dispute essentially addressed the question of free movement, particularly the challenge of Eastern European "free movers" for Western European labour markets (Hampshire, 2016; Favell, 2008).

[3] According to Eurostat, there were around 83,000 Ukrainians with a valid residence permit in Germany and over 230,000 in Italy at the end of 2021 (https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Ukrainian_citizens_in_the_EU). Almost one year later, there was an apparent reversal of the distribution of recorded Ukrainian refugees between these two countries: according to the UNHCR, there were over one million in Germany and around 170,000 in Italy at the end of November 2022 (see https://data.unhcr.org/en/situations/ukraine).

1.3 *E Pluribus Unum*: Bringing Like-Minded Scholars Together

This volume builds on the work of a wide range of scholars who have investigated the logics and routines of action in the field of immigration control in recent decades with the aim of bringing their valuable, yet still unconnected, work within a single and innovative theoretical framework on migration controls in Europe. Specifically, the authors use the framework of a migration regime to focus on organisational strategies, structural features, logics and practices, rather than on legal frameworks, to reframe some persisting differences between European migration regimes, and show where the boundaries of these regimes have started to blur.

In addressing the North-South divide, this book takes Italy and Spain as the reference countries of the South, and Germany and the Netherlands as those of the North. While the first two countries have been regarded as latecomers in developing effective immigration policies, and as the main sources of uncontrolled secondary movements towards other Member States because of their relaxed immigration policies and frequent amnesties, the second pair of countries have been viewed as key shapers of EU migration and asylum legislation and "champions" of migration controls. Moreover, three other countries have been added in individual sections because of their relevance in the specific policy domains addressed there. One chapter on Portugal examines internal controls, since the country has adopted a wide range of strategies to regularise undocumented migrants, thus displaying the entire variety of options implemented by Southern European countries: general amnesties, amnesties based on conditionality (economic conditions and bilateral agreements), case-by-case regularisation and even "emergency regularisation" to cope with the pandemic. The analysis of the welfare-migration nexus, which highlights the connection between welfare chauvinism and intra-EU freedom-of-movement policies, includes a chapter on the UK since it is the most evident case of welfare chauvinism against mobile EU citizens (including Southern Europeans) and its impact on immigration policies; this ultimately contributed to the drastic decision to leave the EU and rid itself of the EU's internal free movement rules. Finally, the case study of Greece is scrutinised with regard to asylum policies, given that the country was indeed at the forefront during the so-called European refugee crisis together with Italy and Germany; moreover, it has served as an inspirational model provider for the New Pact on Migration and Asylum proposed by the European Commission in September 2020, especially with regard to the option of asylum applications processing at the border.

The book is divided in six thematic sections, where two or three chapters contrast Northern and Southern European countries in a given policy domain. These are Visa Policy and External Controls, the Externalisation of Control, Internal Controls, Labour Migration Policy, the Welfare-Migration Nexus, and Asylum Policy. The chapters presented in these six sections use a variety of methods ranging from the analysis of statistical data and official documents to interviews with stakeholders and migrants and, in one case ethnographic research.

The section on External Controls focuses on visa policy, which appears as a key tool of common external controls and is widely acknowledged as a rather successful example of legislative harmonisation in the European Union. Nonetheless, the book's chapters go beyond the legal framework to investigate visa implementation, suggesting a slow blurring of the divides between Southern and Northern European control logics.

In the first chapter, Irene Landini and Giuseppe Sciortino suggest that migration control policies in Western European states should be considered as an interdependent, yet politically segmented, system. They test this view by analysing two migration policy fields widely different in terms of history and development, i.e., visa and return policy, and comparing the relative figures across Member States. With regard to visa policies, their results show that, over time, the original Northern model of visa controls has become the widely accepted normative model across all European states today, while policy harmonization and cooperation in return policies and practices have always remained low. The authors do not observe, however, evidence of a North-South cleavage in either of the policy fields. Instead, with regard to return policies they observe a process of the facto convergence, since all EU states have shown to be largely ineffective in removing unauthorised TCNs from their territories.

The second chapter by Federica Infantino uses the case of Italy, one of the countries that has issued the highest numbers of Schengen visas, to shed light on how and why day-to-day implementation practices challenge "national models" as well as the assertion of a divide between Northern and Southern European countries. Her analysis focuses on the entanglements of logics on paper, policy narratives and organisational practices in a context of continuities and innovations. Infantino notes that the logics and practices governing Italy's visa policy are historically distant from the EU model since the "Schengen model" reflected the interests and needs of the Northern countries that initiated and designed it. Nevertheless, that distance dissipates at the stage of the implementation, so that national boundaries of organisational action are blurred on the ground, while dynamics of policy change are triggered from below.

The section on the Externalisation of Controls unravels the delegation of control responsibilities to third countries, which has become a key instrument to control unwanted flows to the European Union. Such tasks were often considered to be a priority of Southern European Member States, which tried to "pass the buck" to third countries after having been turned into the guards at the external border of the EU. The two chapters show how Southern European countries were indeed pioneers in this field and have since been enthusiastically followed by Northern Europe and the EU as a whole.

The chapter by Lorena Gazzotti, Mercedes Jiménez Álvarez and Keina Espiñeira challenges the assertion of the very existence of a structured European externalisation front, demonstrating that the implementation of a specific border externalisation programme is reactive and inconsistent in nature, driven by dynamics of *ad hoc* reaction to sudden punctual crises. The authors, focusing on Morocco, show how third countries' "migration diplomacy" changed the long-lasting European

North-South divide with respect to externalisation strategies by increasingly involving Northern European countries. In such a context, they stress the tendency of Member States' border agencies to behave like NGOs as they become the actors implementing EU development funding. Against this backdrop, the boundaries between the strategies of Northern and Southern European states blur into the technicalities of delegated cooperation, whereby the agency of a given Member State seems to submit to the functioning of the EU, driven by a clear, yet contradictory, objective to advance securitisation policies.

The chapter by Lorenzo Gabrielli examines the genealogy of practices, logics and organisational strategies within the multilevel policy framework that fostered the development of the Spanish migration regime's external dimension. His analysis focuses on the changing relations between Spain and the EU associated with the policymaking on border externalisation, showing that Spain shifted from a passive receiver of European norms and standards to an active player in European policymaking, fostering changes and new developments in the EU immigration regime. Ultimately, Spain became a model and inspiration for migration policies implemented at the EU level in the 2010s.

Internal Controls represent another major group of control instruments aimed at preventing unwanted settlement, especially in countries where external controls are traditionally weak, such as in Southern Europe. The goal of this section is to analyse different types of internal control logics in the European context, with special attention to regularisations that, more than other migration regulation tools, scholars have used to highlight the "effectiveness gap" existing between Northern and Southern European control regimes, and which have been the object of several confrontations among EU Member States. The chapters of this section show how different European states have to deal with both economic pressure coming from different labour markets as well as with social demands and expectations towards the state. Hence, different strategies, practices and outcomes of internal controls cannot be understood in terms of *laissez-faire* versus strong public policies, and instead have to be explained by mobilising the diversity of social and economic demands.

The chapter by João Peixoto and Jorge Malheiros highlights the fact that the most frequent strategy towards irregular immigration in Southern European migration regimes until the mid-2000s had been the enactment of extraordinary regularisation processes. Afterwards, some countries adopted an ongoing, case-by-case regularisation model. They use Portugal as a reference to develop a comparative analysis and position it at the European level to evaluate the convergence or divergence hypothesis and the blurring of migration regimes' boundaries. The authors conclude that the Southern European migration regime is less homogeneous and exceptional than it is generally presented, and that irregular migration levels depend on economic cycles and the type of economic demand, rather than on the implementation of policy mechanisms facilitating regularisation.

The chapter by Claudia Finotelli addresses the use of regularisations and *ex-post* regulation measures as instruments to produce knowledge on social problems. Using Italy and Germany as comparative examples, the author argues that the function of regularisations should be assessed beyond the dichotomic distinction

between "weak" and "strong" migration control regimes in Southern and Northern Europe. Instead, regularisations and *ex-post* regulation strategies should be seen as an instrument to overcome weak internal controls as well as to gain knowledge about the presence of irregular migrants and stabilise the precarious immigrant population.

Gabriel Echeverría investigates two other countries that have often been portrayed as opposite examples when it comes to internal controls: the Netherlands and Spain, with the former as "top of the class" in strict control enforcement and effective migration deterrence, and the latter as an example of weak control measures and inconsistent results. The author challenges the Manichean hypothesis of "good guys" and "bad guys" in migration controls, by showing that countries display very dynamic conduct that may at times converge or diverge with others, depending on the configuration of societies as a whole and the relationships between their subsystems (culture, politics, economics, welfare, etc.). This analysis shows an ambiguous reality – with similarities and differences, degrees of convergence and the persistence of variance – that is complex enough to elude a clear-cut description of diametric opposites.

The fourth section deals with Labour Migration, a field that has remained the least harmonised in the EU. Labour migration policies have remained relatively distinct within the EU, shaped by the diverse needs of Member States' national labour markets. Insofar as Northern European labour markets are traditionally associated with demand for high-skilled workers, it is generally assumed that in Southern Europe, the demand for low-skilled workers predominates. This section highlights how the logics driving their labour migration regimes in Northern and Southern European countries have begun to overlap, both by balancing restrictions and openings, and by mixing skills-based and low-threshold pathways, albeit to a different extent.

In their chapter, Jan Schneider and Holger Kolb address Germany's slow but steady return to ethnic selectivity and particularistic features in the area of labour migration policy after a decade in which German labour migration policy had moved towards a universalistic regime that applied similar conditions to most third-country nationals applying for admission to the labour market. The authors argue that although human capital remains at the heart of the regulations and institutional settings that govern the process of selecting labour migrants, the factor of the respective country of origin of applicants, which had been regarded as a peculiar trait of Southern European countries' policies, has regained importance in Germany in recent years. These observations run counter to the proverbial North-South divide, suggesting instead unexpected convergence in this area.

The chapter by Camilla Devitt turns to labour migration policies in Southern European countries. Her contribution challenges the common perspective of the North-South divide, typified by Southern European countries exhibiting a distinct approach to the admission of migrants. By exploring Italian labour immigration policy, the author finds that the similarities with Northern European regimes have increased since the Great Recession of 2008, with, for example, a more restrictive approach to inflows of non-seasonal workers from third countries and a stronger

reliance on the free movement of workers from Eastern Europe and non-economic forms of migration for low-medium skilled labour needs. This convergence among allegedly different European migration regimes is explained by the stage of migration, European integration and the impact of the economic crisis.

Finally, the chapter by Jeroen Doomernik, Blanca Garcés-Mascareñas and Berta Güell revisits the debate on the South-North divide on migration regimes by comparing the cases of Spain and the Netherlands with regard to migrant seasonal workers in agriculture, paying particular attention to their situation before and during the COVID-19 pandemic. The authors conclude that differences between the two countries are not that relevant. In both cases, seasonal labour demands were initially covered by newly arrived immigrants, followed by immigrants already in the country; recently, this has been complemented by Central and Eastern European workers who can go back and forth without the constraints imposed by international borders. Moreover, in both countries, the authors see convergence towards major deregulation of the sector, particularly due to the increasing use of temporary agencies.

The section on intra-EU mobility deals with the nexus between immigration and the sustainability of welfare programmes. This has been an object of increasing research interest since the end of the 1970s and has mainly examined the movement of irregular migrants and asylum seekers from Southern European countries to the more generous welfare states of Northern Europe. Yet, this section shows that welfare chauvinism and welfare restrictions are nonetheless not limited to Northern European countries and to traditionally "unwelcome" migrant categories such as asylum seekers or irregular migrants.

The chapter by Alessio D'Angelo critically examines the last few decades of policy and political debates around intra-European migration in the United Kingdom, the key trends that led to the (not so) unpredictable Brexit referendum, and the scenarios that have since then been set in motion with the UK-EU Agreement of 2020. In spite of the strong sense of British exceptionalism that informed debate in the UK, D'Angelo shows that some of the fundamentals underpinning this process have a great deal in common with what we are witnessing elsewhere in Europe, with the stratification of (welfare) rights for different categories of migrants being used as a pragmatic – if not cynical – mechanism to regulate entry and settlement. In fact, what at a political and institutional level currently appears as a major rupture within the European framework may end up revealing itself to be part of a wider trend among both Northern and Southern European regimes: the restrictionist reconfiguration of the welfare-migration nexus.

Claudia Finotelli reverses the North-South perspective on intra-EU mobility and welfare by shifting attention from the intra-EU mobility of young Eastern and Southern Europeans in Northern Europe to the non-labour-motivated mobility of Northern European citizens in Southern Europe. Using Spain as a reference case, her chapter explores to what extent the generally welcome presence of intra-EU retirees from Northern European countries in Southern Europe had an impact on the welfare provisions to inactive EU citizens. As she argues, the increasing demand for healthcare services by elderly European migrants has triggered unexpected forms of welfare chauvinism in Spain and raised the issue of the healthcare costs related to

the presence of intra-EU retirees. This has lead to restricted access to public health care for EU citizens without full residency in Spain, and confirms that the restrictionist turn in the regulation of welfare access to EU citizens has not been limited to Southern European labour migrants in Northern Europe, but can be easily extended to the intra-EU non-labour-motivated mobility in Southern Europe.

The sixth and last section of the book deals with Asylum Policy. Despite the establishment of the Common European Asylum System after the European Council of Tampere in 1999, the North-South divide has been on full display in the field of asylum over the last two decades, with Southern countries accused of failing to fingerprint people crossing the border irregularly, fostering secondary movements of asylum seekers to other Member States, and providing inadequate reception facilities. Against this backdrop, the section contrasts three countries that have been at the forefront of the European refugee crisis – Germany, Italy and Greece – highlighting, on the one hand, significant differences in the degree of institutionalisation of their national asylum regimes, and, on the other, some convergence in the logics of action they have adopted to respond to the increasing arrivals.

The first chapter by Dietrich Thränhardt challenges the widespread idea of Germany as having an "efficient asylum machinery" by contrasting the "culture of welcomeness [*Willkommenskultur*]" in Germany's complex asylum regime with its bureaucratic ambiguity. Thränhardt shows that during the asylum crisis in 2014–17, the Federal Office for Migration and Refugees (BAMF) was unable to process all the asylum requests, leading to a large backlog of applications. This notwithstanding, the author argues that slow asylum processing does not seem to have jeopardised Germany's inclusive potential. The courts correct a high percentage of BAMF decisions, with lawyers and volunteers assisting rejected asylum seekers, while the government provides integration courses supported by employers, churches and many volunteers. In the end, most refugees find work, learn the language, and become part of the social fabric, demonstrating that inclusive elements can prevail despite an incoherent, complex and somewhat dysfunctional bureaucratic apparatus.

Using a biological metaphor of infancy to adulthood, the chapter by Irene Ponzo illustrates how Italy's frames, strategies and practices concerning asylum have changed over the last three decades. For a long time, Italy perceived itself as a transit country and, as a consequence, allowed and even fostered secondary movements of asylum seekers towards other countries and kept its asylum system underdeveloped. Since 2011, the sharp increase of unplanned inflows and the modifications in the institutional settings where negotiations among Member States occur (the full inclusion of Italy into the Schengen Area and the CEAS) led to the failure of those solutions. The result was that the Italian asylum regime came of age: the country of Italy adopted a new policy frame by acknowledging itself as a destination country for asylum seekers, overcame ad hoc emergency solutions, and joined the Northern European countries' call for more responsibility-sharing. In contrast, the country's weak political-institutional capacity has slowed down the consolidation of the new practices.

The third and final chapter of this section, by Angeliki Dimitriadi, deals with the Greek asylum system. She argues that since 2015, Greece has undergone a gradual transformation that has reinforced its role as an external border guard of the European Union, but which has also provided a fertile ground rich in data regarding the policies in place on asylum processing and the reception of irregular arrivals. On the one hand, the European refugee crisis of 2015 resulted in a newly formed reception system, with non-state actors taking on an unprecedented role in offering reception services. Here, Greece has continued in its role as a "student", seeking to provide reception conditions similar to most of its European partners. On the other hand, a differentiated asylum system emerged between land and sea borders, making Greece the only country with two parallel asylum processes. The chapter shows that some of the practices on border controls found their way into the New Pact on Migration and Asylum. This suggests that in this case, Greece has functioned as an inspirational model provider for Europe.

In the concluding chapter we will illustrate the main findings drawn from the comparative reading of the book chapters. Connecting the book contributions, we will show to what extent the combination of practices and organisation logics in different national contexts blurs the North-South divide into a far more complex and overlapping migration reality. On the one hand, we will explain how the book chapters reveal patterns of policy convergence highlighting the key drivers of similarities between Southern and Northern European countries. On the other hand, we will argue that analyses presented in the chapters confirm the persistence of divergence driven by different types of imperatives and internal constraints.

References

Ambrosini, M., & Triandafyllidou, A. (2011). Irregular immigration control in Italy and Greece: Strong fencing and weak gate-keeping serving the labour market. *European Journal of Migration and Law, 13*, 251–273.

Baldwin-Edwards, M. (1997). The emerging European migration regime: Some reflections on implications for southern Europe. *Journal of Common Market Studies, 35*(4), 497–519.

Baldwin-Edwards, M., & Arango, J. (Eds.). (1999). *Immigrants and the informal economy in southern Europe*. Routledge.

Baldwin-Edwards, M. (2012). The southern European "model of immigration". A skeptical view. In M. Okolski (Ed.), *European immigrations – Trends, structures and policy implications* (pp. 149–158). Amsterdam University Press.

Bertossi, C. (2011). National Models of integration in Europe: A comparative and critical analysis. *American Behavioral Scientist, 55*(12), 1561–1580.

Bommes, M. (1999). *Migration und nationaler Wohlfahrtsstaat*. Ein differenzierungstheoretischer Entwurf.

Bommes, M. (2012). Illegal migration in modern society: Consequences and problems of national European migration policies. In C. Boswell & G. D'Amato (Eds.), *Immigration and social systems: Collected essays of Michael Bommes* (pp. 157–176). Amsterdam University Press.

Bommes, M., & Geddes, A. (Eds.). (2000). *Immigration and welfare. Challenging the borders of the welfare state*. Routledge.

Bommes, M., & Thränhardt, D. (2012). National paradigms of migration research. In C. Boswell & G. D'Amato (Eds.), *Immigration and social systems: Collected essays of Michael Bommes* (pp. 201–232). Amsterdam University Press.

Boswell, C. (2003). *European migration policies in flux: Changing patterns of inclusion and exclusion*. Blackwell.

Boswell, C. (2007). Theorizing migration policy: Is there a third way? *International Migration Review, 41*(1), 75–100.

Boswell, C., & Geddes, A. (2011). Migration and mobility in the European Union. *Journal of Ethnic and Migration Studies, 39*(6).

Boucher, A., & Gest, J. (2015). Migration studies at a crossroads: A critique of immigration regime typologies. *Migration Studies, 3*(2), 182–198.

Brochmann, G., & Hammar, T. (Eds.). (1999). *Mechanisms of immigration control a comparative analysis of European regulation policies*. Roudtledge.

Castles, S. (2004a). Why migration policy fail. *Ethnic and Racial Studies, 27*(2), 205–227.

Castles, S. (2004b). The factors that make and unmake migration policies. *International Migration Review, 38*(3), 852–884.

Castles, S., & Kosack, G. (1973). *Immigrant workers and class structure in Western Europe*. Oxford University Press.

Cebolla-Boado, H., & Finotelli, C. (2015). Is there a north-south divide in integration outcomes? A comparison of the integration outcomes of immigrants in southern and northern Europe. *European Journal of Population, 31*(1), 77–102.

Cornelius, W., Martin, P. L., & Hollifield, J. F. (1994). *Controlling immigration. A global perspective*. Stanford University Press.

Cvajner, M., Echeverría, G., & Sciortino, G. (2018). What do we talk when we talk about migration regimes? The diverse theoretical roots of an increasingly popular concept. In A. Pott, C. Rass, & F. Wolff (Eds.), *Was ist ein Migrationsregime? What is a migration regime?* (pp. 65–80). Baden.

Czaika, M., & de Haas, H. (2013). The effectiveness of immigration policies. *Population and Development Review, 39*(3), 487–508.

Echeverría, G. (2020). *Towards a systemic theory of irregular migration: Explaining Ecuadorian irregular migration to Amsterdam and Madrid*. IMISCOE Research/Springer.

Efionayi-Mäder, D., Chimienti, M., Dahinden, J., & Piguet, E. (2001). *Asyldestination Europa*. Eine Geographie der Asylbewegungen.

Favell, A. (2004). Integration nations: The nation-state and research on immigrant in Western Europe. In M. Bommes & E. Morawska (Eds.), *International migration research. Constructions, omissions and the promises of interdisciplinary* (pp. 41–67). Ashgate.

Favell, A. (2008). The new face of east–west migration in Europe. *Journal of Ethnic and Migration Studies, 38*(5), 701–716.

Fellini, I. (2018). Immigrants' labour market outcomes in Italy and Spain: Has the Southern European Model Disrupted during the Crisis? *Migration Studies, 6*(1), 53–78.

Finotelli, C. (2009). The north-south myth revised: A comparison of the Italian and German migration regimes. *West European Politics, 32*(5), 886–903.

Finotelli, C., & Kolb, H. (2017). "The good, the bad and the ugly" reconsidered: A comparison of German, Canadian and Spanish labour migration policies. *Journal of Comparative Policy Analysis, 19*(1), 72–86.

Finotelli, C., & Ponzo, I. (2018). Integration in times of economic decline. Migrant inclusion in Southern European societies: Trends and theoretical implications. *Journal of Ethnic and Migration Studies, 44*(14), 2303–2319.

Freeman, G. (1994). Can Liberal states control unwanted migration? *The Annals of the American Academy of Political and Social Science, 534*(1), 17–30.

Freeman, G. (1995). Modes of immigration politics in Liberal democratic states. *International Migration Review, 29*(4), 881–902.

Garcés-Mascareñas, B., & Penninx, R. (Eds.). (2016). *Integration processes and policies in Europe: Contexts, levels and actors*. Springer.

Giugni, M., Koopmans, R., Passy, F., & Statham, P. (2005). Institutional and discursive opportunities for extreme-right mobilization in five countries. *Mobilization, an International Quarterly, 10*(1), 145–162.

González Enríquez, C., & Triandafyllidou, A. (2009). Introduction: Comparing the new hosts of southern Europe. *European Journal of Migration and Law, 11*(2), 139–158.

Guiraudon, V. (2002). The Marshallian triptych reordered: The role of courts and bureaucracies in furthering migrants' social rights. In M. Bommes & A. Geddes (Eds.), *Immigration and welfare: Challenging the Borders of the welfare state* (pp. 72–89). Routledge.

Hampshire, J. (2016). European migration governance since the Lisbon treaty: Introduction to the special issue. *Journal of Ethnic and Migration Studies, 42*(4), 537–553.

Hollifield, J. (1992). *Immigrants, markets and states: The political economy of postwar Europe*. Cambridge University Press.

Hollifield, J. F., Martin, P. L., & Orrenius, P. M. (Eds.). (2014). *Controlling immigration. A global perspective*, Third Edition. Stanford University Press.

Jacobson, D. (1996). *Rights across Borders. Immigration and the decline of citizenship*. The John Hopkins University Press.

Joppke, C. (1998). Why Liberal states accept unwanted immigration. *World Politics, 50*(2), 266–293.

Joppke, C. (1999). *Immigration and the nation-state: The United States, Germany, and Great Britain*. Oxford University Press.

Joppke, C., & Guiraudon, V. (2001). *Controlling a new migration world*. Routledge.

King, R., Lazaridis, G., & Tsardanidis, C. (Eds.). (2000). *Eldorado or fortress? Migration in southern Europe*. Macmillan.

Lafleur, J. M., & Stanek, M. (Eds.). (2017). *South-north migration of EU citizens in times of crisis*. Springer.

Lahav, G., & Guiraudon, V. (2006). Actors and venues in immigration control: Closing the gap between political demands and policy outcomes. *West European Politics, 29*(2), 201–223.

Martin, P., & Miller M. (2000). *Employer sanctions: French, German and US experiences*. International migration papers 36.

Miles, R., & Thränhardt, D. (1995). *Migration and European integration: The dynamics of inclusion and exclusion*. Pinter Publishers & Fairleigh Dickinson University Press.

Miller, M. (1981). *Foreign workers in Western Europe. An emerging political force*. Prager.

OECD. (2021). *International migration outlook 2021*. OECD Publishing. https://doi.org/10.1787/29f23e9d-en

Papademetriou, D., & Sumption M. (2011). *Rethinking points systems and employer-selected immigration*. Migration Policy Institute, Retrieved on 4 April 2022 from https://www.migrationpolicy.org/pubs/rethinkingpointssystem.pdf

Peixoto, J., Arango, J., Bonifazi, C., Finotelli, C., Sabino, C., Strozza, S., & Triandafyllidou, A. (2012). Immigrants, markets and policies in southern Europe: The making of an immigration model? In M. Okólski (Ed.), *European immigrations: Trends, structures and policy implications* (pp. 107–146). Amsterdam university press.

Ponzo, I. (2021). The great recession as a 'stress test' of migrant incorporation in Europe. Are southern European countries really lame ducks? *Migration Studies, 9*(3), 1096–1115.

Post, D., & Niemann, A. (2007, May 17–19). *The Europeanisation of German asylum policy and the "Germanization" of European asylum policy: The case of the "safe third country" Concept'*. Paper presented at the European Union studies association biennial conference.

Santel, B. (1995). Migrationen in un nach Europa. Erfahrungen, Strukturen, Politik. Leske + Budrich.

Schain, M. (2009). *The politics of immigration in France, Britain and the United States: A comparative study*. Palgrave.

Sciortino, G. (2004). Between phantoms and necessary evils. Some critical points in the study of irregular migrations to Western Europe. *IMIS-Beiträge, 24*, 17–43.

Soysal, Y. (1994). *Limits of citizenship: Migrants and Postnational membership in Europe*. University of Chicago Press.
Thränhardt, D. (2003). Where and why? Comparative perspectives on asylum in the OECD world. In J. Doormenik & H. Knippenberg (Eds.), *Immigration and immigrants: Between policy and reality* (pp. 18–41).
Widgren, J. (1994). The key to Europe: A comparative analysis of entry and asylum policies in western countries. *Migration News*. 2/1, https://migration.ucdavis.edu/mn/more.php?id=551.
Zaun, N. (2017). *EU Asylum Policies. The Power of Strong Regulating States*. Palgrave.