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**Resurrecting taboo policies? Explaining
collective regularisations for unauthorised
immigrants during the Covid-19 pandemic in
Southern Europe**

Lorenzo Piccoli, Anna Kyriazi, and Mariana S. Mendes

European University Institute
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Abstract

Collective regularisation programmes providing legal status to unauthorised immigrants were frequently used by European countries until the late 2000s, when they fell out of fashion. In 2020, at the start of the Covid-19 pandemic, some European governments made use of collective regularisations again, breaking this “taboo”, while others did not. Why this variation in response? We compare policy-making in three Southern European countries that have frequently resorted to collective regularisations in the past, but which took divergent paths during the Covid-19 pandemic despite facing similar health and economic-related pressures: a collective regularisation in Portugal, a targeted regularisation in Italy, and no regularisation in Greece. Informed by a theoretical model that builds on existing explanatory frameworks on migration policy, we use expert interviews, legal and policy documents, parliamentary debates, and press coverage to explain variation in policy outputs. Our findings point to the importance of three conditions: (1) the balance of liberalising versus restrictionist pressures, (2) government ideology, and (3) the scope and implementation of pre-existing regularisation mechanisms. We show that the Covid-19 pandemic worked as a catalyst for the return of policies that were previously considered “taboo” only when policy changes were considered to be cost-free. We argue that, despite functional pressures and discursive opportunities created by the pandemic, the regulation of the status of unauthorised migrants is characterised by continuity and incremental change rather than by sudden ruptures.

Keywords

Public health; Immigration policy; Covid-19; Irregular migration; Southern Europe

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Introduction

Governments sometimes resort to collective regularisation programmes as a response to the presence of immigrants in an irregular situation¹, thereby extending some form of legal status to large groups of unauthorised immigrants in a country. These programmes, or schemes, can take many forms, ranging from temporary protection against removal to permanent residence rights (Levinson 2005; Song and Bloemraad 2021; Triandafyllidou and Spencer 2020). In Europe, collective regularisations were frequently used between the 1980s and the 2000s, when they fell out of fashion, mainly due to the growing opposition of some EU states to the large one-off regularisation programmes implemented disproportionately often in Southern Europe (Baldwin-Edwards and Kraler 2009; Kraler 2019).

The Covid-19 pandemic opened a window of opportunity for governments to implement such policies again based on a combination of principled considerations and functional imperatives arising from the crisis – including, but not limited to, the idea that migrants contribute to the economy as “essential” workers (Anderson, Poeschel, and Ruhs 2021) and the contention that “no-one is safe until everyone is safe” (United Nations High Commissioner for Refugees 2021). In this paper we explain why, during the Covid-19 pandemic, some European governments opted for collective regularisation again while others did not.

We compare domestic policy making in three Southern European countries that have frequently resorted to collective regularisations in the past: Greece, Italy, and Portugal. These countries have often been grouped together as part of the “Southern European model of immigration” (King and DeBono 2013). Yet, their governments took divergent paths during the pandemic, namely: a collective regularisation programme (Portugal), a targeted regularisation (Italy), no regularisation (Greece). Relying on press reports, legal and policy documents, parliamentary debates, and 23 interviews with key informants (listed in the Appendix) this comparison provides original insights to better understanding the conditions under which public emergencies function as catalysts for the return of “taboo” policies in the field of migration governance.

We begin by providing an overview of policies to regulate the status of irregular immigrants and we discuss how the public health emergency represented a window of opportunity for policy change, mapping the novel arguments and justifications for regularisations arising in such a situation. We find that despite broadly similar functional pressures and discursive opportunities created by the pandemic, certain contextual factors make some political environments more favourable than others for policy change. Building on the existing literature on immigration policy-making, we elaborate a comprehensive explanatory framework that posits the combined influence of (1) the presence and relative balance of liberalising versus restrictionist pressures exerted by advocacy coalitions and public opinion respectively, (2) government partisanship, and (3) the pre-existing institutional framework in terms of the existence and implementation of individual-based regularisation mechanisms.

The case-specific combinations of these factors, we argue, explain the divergent approaches taken by the Greek, Italian, and Portuguese governments during the pandemic in addressing the situation of unauthorised migrants. We consider this variation in response to be rooted in long-term divergences in these countries’ approach to migration and its regulation, thus questioning the enduring validity of a “Southern European model of immigration” (Ambrosini 2018; Baldwin-Edwards and Kraler 2009; King and DeBono 2013). More broadly, we show that the Covid-19 pandemic worked as a catalyst for the return of policies that were previously considered “taboo” only when policy changes were considered cost-free. We argue that despite functional pressures and discursive opportunities created by the pandemic, the regulation of the status of unauthorised migrants was characterised by continuity and incremental change rather than by sudden rupture.

¹ We refer to unauthorised or irregular immigrants as those individuals who live in a country without having the legal permit to do so.

Background

Policies to regulate the status of irregular immigrants

Recent estimates place the number of irregular immigrants in Europe between 2.9 and 3.8 million in 2017, corresponding to roughly 1% of the total population (Connor and Passel 2019; Clandestino Project 2009). Irregular immigrants are generally afforded few rights in receiving states, other than emergency medical care – even though specific groups of irregular immigrants, such as unaccompanied children, tend to be better protected (Spencer and Hughes 2015, 12). Their persistent exclusion from basic rights is often justified as a means to deter more irregular migration (Baldwin-Edwards and Kraler 2009, 131). Because of this, irregular immigrants are among the most vulnerable members of a society (Ellermann 2010; Fox-ruhs and Ruhs 2022; Joseph 2017), e.g., they face a higher risk of mortality than the general population (Piccoli and Wanner 2022; Vito et al. 2015).

Their lack of legal and social protection becomes particularly acute during public health emergencies. The Covid-19 pandemic and the lockdowns introduced by governments in Europe exacerbated the sanitary and social vulnerabilities of this segment of the population (Burton-Jeangros et al. 2020; European Centre for Disease Prevention 2021; Sanchez and Achilli 2020; Sanfelici 2021). Thus, the pandemic can be seen as an event that raised functional pressures on governments to address the condition of irregular immigrants.

The repertoire of available policies to regulate the status of irregular immigrants includes four options that can be hierarchically ordered based on the extent of protection that they provide: regularisation, extension of residence/work permits, expanded access to social welfare services, and inaction (Table 1). Governments have considerable leeway regarding which measures to implement. Indeed, during the Covid-19 pandemic, a combination of these were adopted by governments across the world. But while the expansion of specific social rights and the extension of permits have been widely applied across different contexts (OECD 2020), the same is not true for regularisations.

Table 1. Policy options to regulate the status of irregular immigrants

Measure	Definition	Rationale
Regularisation	Any procedure that creates a path for individuals staying irregularly to gain legal status	Restorative
Extension of residence/work permits	Temporary renewal of residence/work permits valid to remain the country	Preventive
Expanded access to social welfare services	Expansion of access to social welfare services beyond emergency care	Supplementary
Inaction	No measure taken	Neglect

Note: Authors' own elaboration.

Among these, regularisations have a practical as well as symbolic significance as a membership mechanism that allows beneficiaries to assert, even if temporarily, a claim to full inclusion into society. Regularisations have been found to improving the quality of life of the concerned individuals, including their employment situation and access to basic services (Heylin and Triandafyllidou 2023). It should be made clear that collective regularisation programmes are not the same as *individual regularisation mechanisms*, which are “built into immigration law and applied to individuals who meet specified criteria” (Song and Bloemraad 2021, 1). While regularisation programmes are time-limited, seen as exceptional, and generally targeting a large group of applicants, mechanisms represent more open-ended and long-term policies, typically involving individual applications and

“earned” legalisation (e.g., by virtue of long-term residence or humanitarian considerations) (Baldwin-Edwards and Kraler 2009). Beyond these general characteristics, regularisation programmes vary significantly in terms of scope and eligibility criteria. One common trend in Europe has been the progressive marginalisation of regularisation programmes, viewed as a “taboo option” in a political context that has grown more adverse towards irregular migration – as we discuss in more detail below.

A short history of regularisation programmes in Europe

Regularisation programmes were frequently used in Europe between the 1980s and the 2000s. Between 1996-2007, there have been at least 43 regularisation programmes in 17 EU countries resulting in a total of 4.7 million applicants, of which about 3.2 million were granted legal status (Baldwin-Edwards and Kraler 2009). The geographical distribution of these programmes has been highly skewed towards Southern European countries: Italy, Spain, Greece, and Portugal account for as much as 2.9 million, or 90%, of immigrants with regularised status (Baldwin-Edwards and Kraler 2009; Triandafyllidou 2014; Finotelli and Arango 2011). In fact, collective regularisations have been among the defining features of the “Southern European approach to migration” until the early 2010s (Ambrosini 2018; Baldwin-Edwards and Kraler 2009; King and DeBono 2013). In the face of large-scale irregular migration and given the absence of regular entry channels, governments of these countries resorted to periodic “amnesties” for unauthorised migrants.

Western and Northern EU countries have been the most critical of regularisation schemes, viewing them as the result of policy failures and worrying that, once regularised, migrants would head to the EU’s richer member states. Despite having adopted regularisations in the past, France proposed a ban on large-scale regularisations when holding the EU’s rotating Presidency in 2008. The European Pact on Immigration and Asylum included a recommendation that Member States only carry out case-by-case regularisations “for humanitarian and economic reasons” (Council of the European Union 2008, 7). Since then, regularisation programs have been seldomly used. The last large-scale regularisations before the start of the Covid-19 pandemic were undertaken in Italy and Poland in 2012 (Delvino 2020, 80; Kraler 2019, 99).

The so-called migration crisis in 2015-2016 tipped the balance toward opposition to regularisation schemes, as European states, and the European Union itself enacted or reinforced measures to deter or return irregular migrants (Kraler 2019). This coincided with immigration becoming one of the most highly politicised issues throughout Europe, contributing to the growth of the populist radical right, and putting additional pressure on policy makers to adopt a “restrictionist” stance (Abou-Chadi et al. 2022; Ellermann and Goenaga 2019).

The Covid-19 pandemic as a window of opportunity for policy change

Public emergencies can function as windows of opportunity for policy change. New functional pressures can be used by resourceful actors to promote or advance certain policy agendas (e.g., Junk et al. 2021). Indeed, the pandemic “revamped the policy debate over the opportunity of formally including (certain) irregular migrants into European societies” (Mallet-Garcia and Delvino 2020), marking the return of regularisation programmes in Ireland (Buczkowska 2022), Italy (Campomori and Marchetti 2020; Sanfelici 2021), and Portugal (Gil 2021).

The use of regularisation programmes has been traditionally justified on various grounds, including labour-market-related considerations, i.e., to fight irregular employment and avoid unfair competition with domestic workers (Chauvin, Garcés-Mascareñas, and Kraler 2013; Greenway 2007; Levinson 2005). They have also been seen as a means of securing social security payments and increasing tax revenues (Greenway 2007), preventing illegal activities associated with irregular migration

(Baldwin-Edwards and Kraler 2009), providing authorities with information about the demographics and labour participation of the migrant population (Levinson 2005), and protecting the basic rights of immigrants, preventing their exploitation, and facilitating integration (Kraler 2019).

In the context of a global health emergency additional reasons for the expansion of rights of irregular migrants came to the fore. We summarise and divide these in four different categories, distinguishing between arguments based on principled and pragmatic reasons, as well as on considerations revolving around the protection of health and welfare and those revolving around the protection of the economy (Table 2).

Table 2. Four arguments for the expansion of rights of irregular migrants during a pandemic

	Health and welfare	Economy
Pragmatic	No-one is safe until everyone is safe	Avoid disruption of supply chains
Principled	Right to health and life irrespective of status	Migrants' contribution as "essential" workers

Note: Authors' own elaboration.

The first argument falls under the idea that "no-one is safe until everyone is safe". This is a particularly compelling argument in the context of a global pandemic, when health care assistance and social welfare measures for marginalised and vulnerable groups can help stop the circulation of the virus. Available evidence shows that during the early phase of the pandemic there was a lack of health care assistance for undocumented immigrants, which is one of the main reasons why they have been at higher risk of morbidity and mortality from the SARS-CoV-2 infection (European Centre for Disease Prevention 2021; Fabiani et al. 2021). As the lack of protection of disadvantaged groups can easily translate into mounting infection rates, there is a pragmatic argument to be made for the expansion of rights to irregular immigrants based on public health concerns. However, the expansion of rights for irregular immigrants during a public health crisis can also rest on the argument that all individuals should have the right to health and life irrespective of their status. Rather than prioritising the interest of society, this justification is based on principled considerations regarding universality of access to health care and a dignified life.

The pandemic also provided economy-based arguments for the expansion of rights available to irregular immigrants because of the role they play in supply chains. The growing awareness that immigrants represent a significant share of the workers that fulfil critical tasks on the frontline sparked discussions about policy measures to confront their condition (Anderson, Poeschel, and Ruhs 2021; Fasani and Mazza 2020; Gelatt 2020). In particular, the recognition that they fulfil certain labour market needs and the concern that restrictions on movement would create disruption in sectors where migrants are overrepresented created the opportunity to expand the rights available to them based on the pragmatic view that supply chains would be negatively impacted if (irregular) migrants were left unprotected.

Finally, there are also principled arguments in this regard. For example, with the recognition of agricultural workers, delivery workers, health workers, and social care workers as "essential" (Garcés-Mascreñas 2021), the Covid-19 pandemic represented an opportunity to regularise their status as means of appreciating their contribution to fighting the pandemic. This recognition is especially important as immigrants – and irregular immigrants especially – generally fall on the bottom of hierarchies of deservingness (van Oorschot 2006) and civic stratification (Morris 2003), which tends to justify their exclusion from institutionalised solidarity.

Having mapped out the available policy options to regulate the status of irregular migrants (Table 1) and the arguments that could be mobilised to expand the protections available to them during the pandemic (Table 2), we now turn to the drivers behind cross-country variation in the adoption of regularisation programmes.

Explaining policy change and policy inaction towards irregular immigrants during the Covid-19 pandemic

Country cases

We compare domestic policy-making processes in three countries that are part of the so-called Southern European model of migration: Italy, Greece, and Portugal. These countries went from being predominantly migrant sending to migrant receiving states around the 1980s, owing to increasing levels of prosperity but also as an outcome of historical events (e.g., the collapse of state socialism). Indicatively, while the international migrant “stock” as a percentage of the total population in 1990 was 6.1% in Greece, 4.4% in Portugal and 2.5% in Italy, by 2015 it had reached 11.3%, 8%, and 9.7%, respectively (World Bank 2022).

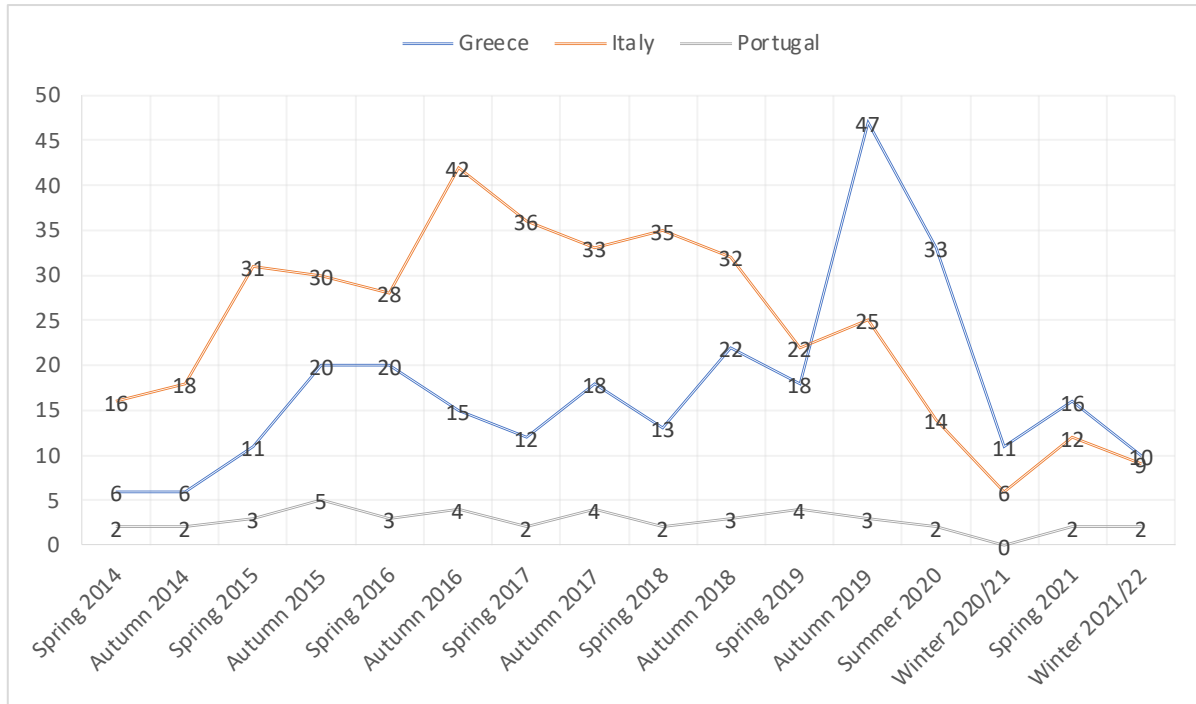
Today, the share of people born abroad among their total population is very similar for the three countries, while the share of non-nationals is slightly lower for Portugal (something that reflects, at least in part, the higher naturalisation rates in the country). Migration flows to Southern Europe have been very diverse, except in Greece, where most immigrants are citizens of neighbouring Albania. In Italy, the main country of citizenship and birth of its foreign population is Romania (21%) while in Portugal it is Brazil (28%) (Eurostat 2021). Recent estimates suggest that undocumented immigrants make up approximately 1% of the total resident population in Greece, Italy, and Portugal (Clandestino Project 2009; Eurostat 2021; ISMU 2021; Kapsalis et al. 2021).

Despite broadly comparable contextual conditions, the three countries adopted different policies towards irregular migrants during the pandemic. To explain these differences, we draw on and expand the scholarship on migration policy making (Abou-Chadi 2016; Howard 2006). We highlight the relevance of (1) restrictionist versus liberalising pressures, (2) the ideological predisposition of governments, and (3) pre-existing framework of regularisation mechanisms against which change occurs.

The presence of restrictionist versus liberalising pressures

An important set of factors shaping immigration policy relate to the salience of immigration among people’s concerns, and, relatedly, the relative insulation of policy makers from restrictionist public pressures. Knowing that a substantial share of the electorate is critical of immigration and that anti-immigration voters feel stronger about the issue than those who are pro-immigration (Dennison and Geddes 2019; Kustov 2021), we expect policy makers to be more cautious in settings where immigration is a salient issue. We provide a visual representation of the evolution of the salience of immigration in Greece, Italy, and Portugal in Figure 1 below.

Figure 1. Salience of immigration in Greece, Italy, and Portugal (2014-2022)



Source: Authors' elaboration based on Standard Eurobarometer (waves 81 to 96). "What do you think are the two most important issues facing (OUR COUNTRY) at the moment?" (%)

Issue salience is a predictor of the restrictiveness of national immigration laws (Givens and Luedtke 2005) and this is especially true in settings with relatively strong far right parties, who mobilise or "activate" anti-immigration sentiment (Howard 2010). Conversely, where immigration is a low salience issue and policy making can take place behind closed doors, there is less pressure to produce a policy the public endorses (Givens and Luedtke 2005). A similar argument is made by Ellerman (2021) who highlights the importance of "political insulation" in accounting for the capacity of policy makers to turn their immigration preferences into policy. Relatedly, Abou-Chadi (2016) shows that the extent to which parties are conditioned by public opinion salience depends on the degree of political competition (or, to use Ellerman's terms, how insulated from political competition they are).

Nonetheless, if public opinion overall is invariably taken as a *restrictionist* type of pressure, there are usually *liberalising* sources of pressure too. This is most notably the case of interest groups or advocacy coalitions, including social partners (employers' associations and trade unions) and advocacy groups (migrants' associations, faith-based organisations, human rights groups). These entities have traditionally supported regularisations (Ambrosini and van der Leun 2015; Laubenthal 2011). Their room for influence is generally greater in contexts where immigration is not a highly politicised issue and more a matter of "client politics" (Ellermann 2021). Though the political clout of advocacy coalitions tends to be small – and thus dependent on the willingness of policy makers to listen to them –, they can nonetheless play an important role in agenda setting, especially if they are able to adapt their claims in times of crisis (Junk et al. 2021).

The ideological predisposition of governments

Though regularisation programmes have sometimes been implemented by right-wing governments (Ambrosini 2018; King and DeBono 2013), recent studies show that partisanship has become more important in accounting for the direction of immigration policy change (Akkerman 2012; Abou-Chadi 2016), even if its effects are limited to certain policy areas (Natter et al. 2020). While there seems to be no significant partisan effect on entry policies, left-wing dominated governments and parliaments are more liberal in granting post-entry rights, including to undocumented immigrants (Natter et al. 2020). The underlying logic is that values such as respecting human rights and international solidarity contrast with the more conservative and nationalist stances of right-wing parties (Helbling 2014). This picture is complicated by their traditional positions on market protectionism vs. liberalism (which could make the left more wary of the impact of immigration on native workers and the right more receptive to the pressure of business interests that seek poorly paid immigrant labourers). Nonetheless, this concern applies more to *entry* rather than *post-entry rights* (notably because granting socio-economic rights to unauthorised immigrants is seen as means to prevent unfair labour market competition).

The existence and functioning of regularisation mechanisms

Policy change must be evaluated against the pre-existing policy framework, in line with approaches that emphasise the path-dependent nature of policy choices and institutions more broadly. In the context of regularisation programmes, it is particularly important not only to take into consideration the prior existence of such programmes but also the specific institutional setup regarding individual-based mechanisms. In this respect, it could be expected that the more inclusive individual-based mechanisms are, the less likely it is for collective regularisations to be adopted. The reason is that there should be no need for exceptional measures if the existing legal framework provides sufficient avenues for the regularisation of undocumented migrants. In practice, however, no framework is generous enough for this to be true. Nevertheless, there are substantial cross-country differences in this regard and these matter in understanding the adoption of collective regularisation programmes for two reasons: (1) on the one hand, liberal changes can be expected in settings with more liberal frameworks, where these will not be seen as a “radical break” with past patterns; (2) on the other hand, the (mal)functioning of existing individual-based regularisation mechanisms creates functional pressures for additional measures in an emergency setting, as the Portuguese case will show.

To be sure, all three countries included in our analysis have individual mechanisms based on humanitarian grounds that sometimes work as “tacit regularisation mechanisms” (Heylin and Triandafyllidou 2023: 8). These are residual forms of protection available to those who are not eligible for refugee status but cannot be removed from the national territory because of objective and serious personal situations. Other than humanitarian circumstances, Greece, Italy, and Portugal vary significantly as far as individual-based regularisation mechanisms are concerned.

In Italy, regularisation is possible via the “dual use” of slots that were initially intended for the admission of new labour migrants (its “quota system” is first and foremost meant for foreigners living abroad, not for those already present in the territory). In practice, these are used by few people and it is difficult to obtain such regular status after falling into irregularity (Interview: I-7).

In Portugal, individual regularisation mechanisms have been expanded over time. Under current rules, migrants present in the territory can obtain a residence permit if holding a work contract or simply an offer of employment letter. Although initially this was only allowed under the condition that entry in the territory was done via legal means (thus already covering those who enter on a tourist visa), an amendment in 2019 established that entry in the territory was presumed legal whenever the applicant had his/her situation regularised before social security services in the last 12 months (Gil 2021). Due to a growing number of applications and lack of administrative capacity to process them, administrative delays have resulted in a large number of pending applications.

In Greece, according to the law on immigration and social integration (Law 4251/2014), the main avenue for regularisation is documented presence in the country lasting at least seven consecutive years. Other avenues to regularisation also exist, e.g., for third country citizens who originally came to the Greece to study. Similar to Portugal, the Greek system is also mired by delays and backlogs (Interview G-5). While in Greece there are no labour-market related mechanisms for regularisation, there is a special circumstance that deserves mention. An amendment to the law 4384/2016 on agricultural cooperatives added a new article to the Law 4251/2014 allowing employers to request to employ 'citizens of third countries lacking a residence permit in the country' but only in exceptional circumstances and if the work needs could not be met through existing legal channels. This 'para-legal' status offers very limited, temporary access to the labour market in specific sectors (agriculture, animal husbandry and domestic work) and geographic areas for those whose removal order is in this way postponed (Kapsalis 2018). The New Democracy government abolished this possibility in 2021, but because of widespread complaints of labour shortages it re-introduced a more limited version by way of derogation.

Empirical analysis: Government measures for irregular immigrants during the pandemic

On 31 January 2020, Italy was the first EU member state to declare a state of emergency in response to the Covid-19 pandemic. Greece did the same on February 20 and Portugal followed on 18 March 2020. The three countries experienced large and persistent outbreaks in 2020 and 2021, adopting similar restrictions on mobility: e.g., closure of the borders, curfews and controls, and closure of all commercial and retail activities except those deemed essential (Piccoli et al. 2020). These restrictions had a disproportionately negative effect on unauthorised immigrants, either because of the labour-market repercussions of such measures or because they feared that police-enforced curfews may result in their detection and expulsion (Sanfelici 2021).

Portugal

Portugal received much praise in the initial stages of the pandemic for acting swiftly to protect irregular immigrants (Euronews 2020). Order 3863-b/2020, issued on 27 March 2020, granted temporary residence rights to all immigrants and asylum seekers who had pending applications at the Aliens and Borders Service (SEF). Those who had submitted their requests up until 18 March 2020 were temporarily considered legal residents. Follow-up orders, in November 2020 and April 2021, extended this provision to new candidates who submitted their requests after the pandemic's onset (the latest of which covered applications made until 30 April 2021).² Status-based obstacles in the access to public services and to welfare state entitlements were therefore eliminated. This includes obstacles in the access to the public health care system: under normal circumstances, undocumented immigrants can be charged full price for non-emergency medical care. The regularisation also allowed beneficiaries to sign lease contracts and open bank accounts. In addition, the Portuguese government implemented an order meant to "simplify procedures for processing residence permit applications" (Despacho nº 5793-A/2020). Among other things, the order established that the documents submitted at the time of application were valid, regardless of whether they had later expired. This was important for the protection of immigrants who had meanwhile lost their job, a non-negligible scenario considering the pandemic's impact in economic sectors with a substantial representation of foreigners (e.g., tourism and restaurant sector).

² Though Order 3863-b/2020 established a date in which the regularisation effects would cease, a follow-up Order (4473-A/2021 [30 April 2021]) did not, foreseeing that all those covered would be considered legal residents until receiving a final decision on their application.

The adoption of temporary regularisation measures was justified both on pragmatic and principled grounds. On the one hand, the ministerial orders referred to “the need to reduce public health risks associated with customer service, both for SEF employees and for the users of these public services”. A similar pragmatic argument was made by the Minister of Interior, who said that “in a state of emergency, the priority is the defence of collective health and security” (Henriques 2020). On the other hand, the abovementioned ministerial orders also spoke of the need to “unequivocally guarantee the rights of all foreign citizens with pending cases”. The framing of these measures in a principled manner is particularly evident in the declarations of political representatives – in an interview, the Secretary of State for Health stated that “we strongly believe that health is a human right and that all should be able to access quality health care” (Silva 2020). The Minister of Interior took this further and did not restrict himself only to the right to health, stating that “It is in moments like these that it becomes even more important to guarantee the rights of the most fragile, as is the case of migrants. Ensuring migrant citizens’ access to health, social security, a job and housing stability is a duty of a solidary society in times of crisis” (Henriques 2020). Similarly, the Secretary of State for Integration and Migration stressed that the measure was part of the government’s concern in “assisting all those who are in a more vulnerable situation (...) so that they can access all the support they are entitled to”, specifying that it aimed to protect immigrants “who worked mainly in restaurants and who have now been dismissed” (Lusa 2021). These declarations shed light on the fact that, rather than being motivated by public health concerns only, regularisation measures were also a means to widen the social safety net in anticipation of the economic impact of the crisis.

These measures were approved by the executive, and signed by four different ministers³, with no discussion of its contents in parliament or any other non-executive setting. It was not until their approval that the media reported on them (and, even then, with only a few news pieces). This is to say that the government was largely insulated from public pressure, something that is also true for the follow-up measures given the utter absence of any type of media or public discussion. In Portugal, migration is an extremely low salience issue in general – both in party competition as well as in public opinion (Carvalho and Duarte 2020). This, in turn, must be understood in a context where, due to its peripheral geographical and economic position, Portugal has remained relatively isolated from the effects of the so-called European migration crisis of 2015-16, being the country in Western Europe with the lowest number of asylum applications (Mendes and Dennison 2021).

The absence of “negative” sources of pressure contrasts with the presence of “positive” ones, setting the agenda. If the government was aware of the need to protect the rights of migrants – and specifically the ones who had pending processes and were at risk of unemployment –, it is at least in part because civil society associations had already raised this issue multiple times. One week before the first ministerial order was approved, a group of about 20 different associations wrote a letter to the Secretary of State for Integration and Migration expressing a series of concerns related to the impact of the pandemic – and its economic repercussions – on the welfare of migrants. These concerns were reproduced in one of the main national newspapers, *Público* (Henriques 2020). Authors and signatories of the letter highlight it was well received by the Secretary of State (Interviews P-1 and P-2). They also confirm that access to welfare protection by migrants at risk of unemployment was their main concern when writing the said letter, which is consistent with the abovementioned declarations of the Secretary of the State (Interviews P-1 and P-2). Furthermore, they also recognise that, even though the actions of civil society groups were important, there was “political will” on the part of the government: “there was a political concern to think about this group [immigrants]; the political discourse was important, as it placed migrants as subjects of rights” (Interview P-1).

Indeed, the preferences of the Portuguese left-wing executive lean towards a liberal approach to immigration. This is clear both in the policy steps it has taken in the past – as the regularisation possibilities foreseen in the Portuguese Immigration Law have been gradually expanded (Gil 2021) –, and in political discourse. Whereas the most significant legislative changes have taken place under

³ Minister of State and Presidency, Minister of Interior, Minister of Labour, Solidary and Social Security, and Minister of Health.

centre-left governments, there has been a substantial degree of agreement between the centre-left and centre-right on the issue of immigration (Carvalho and Duarte 2020). Although there is little talk of migration in general, when there is, representatives do not shy away from framing it in a positive light. As an example, when disclosing the number of migrants covered by one of the ministerial orders, the Minister of Interior stressed that he considers the growth of the foreign population to be something positive (Lusa 2021). This is in line with the general stance of the governing party (the centre-left *Partido Socialista*). In its 2022 electoral manifesto, it takes pride in the “fundamental role” it has played in “the creation of conditions for the regularisation of undocumented immigrants”, proposing to further enlarge the formal channels for regular migration. It says furthermore that “it will always be on the side of refugees and immigrants in situations of deprivation” and that such policies are “an expression of a country that is tolerant, diverse, and open to the world” (Socialista 2019). This is consistent with the impressions of pro-migrant associations that have pointed out that, despite serious issues in translating policy into practice, the government is keen on promoting the image of a “non-racist and welcoming country” (Interview P-1).

In terms of policy outcomes, even though data is sparse and unsystematic, the Aliens and Borders Service (SEF) has said that the two orders issued in 2020 have benefited more than 350,000 migrants (Lusa 2021). This number is strikingly high when considering that it is the equivalent of 3,4% of the Portuguese total population and that it represents about half of the total foreign population (this might be because there is either double counting of beneficiaries or that SEF is including here also those who had their permits renewed or extended). In either case, this confirms the large number of pending procedures and the administrative backlogs at SEF that had been denounced by multiple entities before (including the Ombudsman and migrants’ associations) (Henriques 2019). Members of the government were aware of this and had already recognised before the pandemic’s onset that the simplification of regularisation processes was needed (JN 2019). This was in a context where migration to Portugal was growing considerably, but administrative capacity was not: in 2019, the number of foreign residences holding a residence permit increased by 23% relative to the previous year and in 2020 another 12.2% (Reis, Sousa, and Machado 2020). Therefore, another policy outcome – and an additional driver of the measures approved – was to (at least temporarily) alleviate the administrative pressure that SEF had been under. Yet, as it is usually the case with regularisation programmes, these only provide “quick fix” solutions that are neither universal (as irregular immigrants who had not submitted residency requests were not considered) nor a means to produce structural changes.

Italy

The Italian government introduced a regularisation programme as part of the Relaunch Decree, or Law-Decree n. 34 of 19/05/2020, which included several measures to support the Italian economy in the context of the Covid-19 pandemic. Art. 103 of the decree aims to “ensure adequate levels of individual and collective health protection” and to “provide a pathway for irregular employment relationships to come to the surface”. It created a temporary programme to regularise the status of unauthorised immigrants employed in three sectors of the economy: agriculture, livestock, animal husbandry, fisheries, aquaculture, and related activities; social care; and domestic work. The programme included two tracks. In the first track, employers could apply for a residence permit for work reasons for their unauthorised employees. In the second track, unauthorised individuals who had recently worked in one of the sectors listed above could apply for a six-month residence permit to look for a new job, provided they previously had a valid residence permit, which had expired after 31 October 2019. Candidates had to prove that they had been in Italy before 8 March 2020, which is when the first national lockdown was imposed. Applications for the regularisation programme were open between 1 June and 15 July 2020, with the deadline subsequently extended to 15 August 2020.

This collective regularisation programme came as a surprise to international observers (Reidy 2020). The 2020 Italian government comprised a diverse party coalition between *Movimento Cinque Stelle*, *Partito Democratico* (centre-left), *ItaliaViva* (centre), *Forza Italia* (centre-right), and *Lega Nord* (right). Due to this heterogeneous composition, the government had steered clear from legislating on the controversial issue of migration, a highly salient topic in the Italian public debate throughout the period from 2015 to 2019 (Dennison and Geddes 2019). However, with the start of the pandemic, the salience of migration in public debates significantly decreased (Figure 1), as other topics gained renewed importance (Cubbe 2021).

Chief among these was the protection of critical supply chains. In March 2020, shortly after the introduction of the national lock-down, *Coldiretti*, the National Confederation of Agricultural Producers, warned about the disruption of agricultural supplies. This was based on the observation that many seasonal migrants traditionally employed in the fields were unable to travel to the country due to border closures: “with the suspension of international mobility, more than ¼ of the Made in Italy on our tables is at risk, because this is normally collected by foreign hands, with 370,000 regular workers arriving from abroad every year” (Coldiretti 2020). The call made the headlines, with newspapers highlighting that “if something is not done to make up for the shortage of seasonal workers, 40% of uncollected fruit and vegetables will rot in the fields, bringing Italian agriculture to its knees” (Gaita 2020). The National Observatory of one of the main agricultural trade unions, *Flai-Cgil*, proposed a simplified regularisation programme to meet these needs (Interview I-4). Thirteen associations that were already campaigning for the creation of regular channels of migration as part of the campaign “Ero Straniero” (first launched in 2017) used this situation as an opportunity to promote a collective regularisation programme to reduce irregularity (Interview I-7). These associations framed their proposal as a self-evident solution to the problems raised by *Coldiretti* (Ero Straniero 2020).

These calls were picked up by the Minister of Agriculture, Teresa Bellanova, of *ItaliaViva*. The Minister had a long career in trade unions, with previous personal contacts with many of the individuals working for the associations campaigning for the expansion of the rights of irregular immigrants (I-7). The regularisation programme was presented by the Minister as a pragmatic measure aimed at addressing the economic repercussions of the pandemic – chiefly, the interruption of critical supply of goods and services. On 14 April 2020, the Minister published an op-ed in a national newspaper explaining that the government was planning a regularisation programme for 600,000 irregular immigrants “to restart the economy” (Bellanova 2020). The next day, speaking before Parliament, she presented a regularisation programme targeted at immigrants working in the agricultural sector and which was “aimed at guaranteeing health and social security to the person, together with the safeguarding of the agricultural system, which, even in this moment of crisis, represents a fundamental resource of the country” (Ministero delle politiche agricole alimentari e forestali 2020). Following contacts with the Ministry of Interior, led by the independent Luciana Lamorgese, and by the Ministry of the South, led by Giuseppe Provenzano of *Partito Democratico*, the government then expanded the scope of the regularisation programme to two other sectors with high rates of informal employment of foreign workers and which faced the risk of labour shortages: social and domestic care (Interview I-3).

The measure was extensively debated and gained large visibility in the national media (Casadio 2022). Opposition came from two parties in government: the *Movimento Cinque Stelle*, which argued the regularisation programme would only further legitimise labour exploitation instead of reducing it; and the *Lega Nord*, which warned against negative consequences for the economy and for the country’s social cohesion. Outside of the government, the far right *Fratelli d’Italia* opposed the measure on the same grounds: economy and social cohesion. After lengthy negotiations, in early May 2020 the Minister of Agriculture publicly threatened to resign if the measure was not approved (Custodero 2021). Eventually, a compromise was found: the regularisation programme was included in the Relaunch Decree with stringent conditions imposed by the conservative parties in government.

These conditions included: a particularly short timeframe for applications (the programme was approved at the end of May 2020 and the initial deadline for applications was 15 July 2020), limitation to specific sectors of employment (agriculture, social care, and domestic work), the obligation for the employer to fill in the application, and requirement of documentary proof that the candidate had been in Italy before 8 March 2020 (Interview I-3).

As a result of these stringent conditions, the adopted programme led to long waiting times and to a relatively small number of successful applications. By 2 March 2022, 207,870 individuals applied for the regularisation programme (far below the number of 600,000 initially set by the government) and only 60% of these applications had been processed (Ministero degli Affari Interni 2022). Thus, this regularisation programme had a limited impact.

Greece

The first wave of the pandemic in Europe coincided with a heated dispute between the Turkish government and the EU, with President Erdogan complaining about the EU-Turkey deal, and announcing his decision to open Turkey's border to migrants and asylum-seekers to reach Greece (Boffey 2020). The episode significantly increased the salience of migration in the country (Figure 1), limiting the already weak possibility to liberalise the existing policy framework in Greece (Interview G-1).

While earlier regularisation programmes were implemented by both left and right-wing governments, the current New Democracy's government ideology and its positioning on migration made the adoption of a collective regularisation programme during the pandemic unlikely. New Democracy was elected in the summer of 2019 promising to overhaul the country's migration policy, especially as it relates to "illegal" migration (Kyriazi 2019), which since 2015 has been closely associated with the presence of asylum seekers in the country. It is worth noting that the moderate/centrist wing of New Democracy, led by Prime Minister Mitsotakis, coexists with a more explicitly nationalist current, originating from the Greek far right, including the Health Minister, Thanos Plevris and other high-ranking officials. Indeed, since coming to power, the Greek government has proposed or introduced restrictive policies on various fronts, not only in relation to regularisation, but also naturalisation and international protection, coupled with strict border controls.

Nevertheless, the New Democracy government introduced some preventive and complementary measures to regulate the status of immigrants during the pandemic (see: Table 1). Given the closures of public services, a series of ministerial decisions automatically renewed the validity of residence cards, residence permit application certificates (blue certificates), cards of international protection and other special legal residence certificates (see, e.g., Generation 0.2 2022). The government did not take any measures facilitating first-time applications for regularisation.

In parallel, some steps were taken to expand irregular migrants' access to healthcare, with a particular focus on their participation in the country's vaccination campaign, rolled out in the Spring of 2021. To schedule a vaccination appointment and for the issuance of a vaccination certificate (green pass) one needed to possess a social security registration number known as AMKA. Issuing this number requires valid identification documents and is therefore tied to legal residence in the country. The primary focus of the government and administration became making sure that irregular migrants who did not possess an AMKA could get one. The related legislation was adopted over nine months, including three joint ministerial decisions and three laws passed in parliament. There was little public debate on these measures, except from the rules regarding deportability. Health Minister Thanos Plevris appeared in Greek media to confirm that irregular immigrants or people against whom an expulsion or return decision had been issued were not subject to compulsory removal measures

during their participation in the vaccination programme. At the same time, he went into pains to clarify that “deportation measures would be lifted at the time of their [i.e., undocumented migrants] arrival at a vaccination centre, and did not amount to generally lifting their deportation measures if they choose to be vaccinated” (Ethnos 2021). This is indicative of the unwillingness of the Greek government to address irregularity by any means other than restriction.

Such instances of a high-ranking government official speaking about undocumented migrants’ access to healthcare in the pandemic were few and far between, with the preferred strategy being one of de-politicisation, instead. A broader public debate about the problems facing undocumented migrants in accessing healthcare, let alone their contribution to the Greek economy and society, was absent. In parliament, government officials justified the legislative instruments as necessary to protect collective public health.

During the pandemic, several associations active in the field of migration in Greece advocated for immigrants’ improved access to healthcare and highlighted the problems they faced (e.g., PICUM 2021). Dissatisfied with the slow progress of the legislation, in July 2021 the civil society initiative “Vaccines for all” was launched by a group of NGOs. The campaign’s discourse blended humanitarian and health frames, by calling attention to the plight of people without papers arguing that: [...] public health is protected when all people have access to the good called health. [...] Everyone has the right to a vaccination!” The main associations were also formally included in working groups set up across the relevant ministries (Interviews G-3, G-9, G-11) and were consulted on the design of government policies.

This said, the overwhelming emphasis has been on taking care of migrants’ basic healthcare needs as opposed to regularisation of status. Indeed, when civil society organisations perceive that certain options are off the table – i.e., that the political opportunity structure is closed –, they may avoid putting forward claims perceived as unrealistic, focusing on more modest ones instead. Another difference, especially with the case of Italy, is the composition of the migrant-rights advocacy coalition and most notably the absence of the social partners and especially the Greek labour unions from any major initiatives. Even though unions are generally sympathetic to migrant workers, including undocumented ones, they have limited influence due to their ideological and organisational weakness (Kapsalis, Levanti, and Vlassopoulos 2021). As a result, even though migrant rights associations coordinated closely with each other during the pandemic, they cooperated only occasionally and in an ad hoc manner with labour unions, mainly because of lack of capacity rather than lack of intent (Interview G-11). Hence, a diverse and broad advocacy coalition that could potentially take up the issue of collective regularisations was not present in Greece.

This is despite the fact that, like in Italy, in Greece too the vulnerabilities of the agricultural sector became a significant concern in the pandemic. In April 2020 employers’ organisations warned that border closures would lead to a shortage of migrant agricultural workers who normally arrive to Greece every year for the Spring harvest, predominantly from neighbouring Albania (Documento 2020). As a response, in early May 2020 a decree allowed third country nationals to enter the country to work in the fields (Capital.gr 2020), which was prolonged at least until September 2022. A significant mobilisation for regularisation also took place in Manolada, an area which is home to strawberry fields, tended to by migrant workers, most of them undocumented and living in very poor conditions. In November 2021 an assembly of 300 migrant agricultural workers, mainly from Bangladesh, elected a committee that put forth demands related to the protection of their health (issuance of AMKA, urgent vaccinations against Covid-19) but also improved working conditions and regularisation of status (in.gr 2021). The matter was taken up by the Communist Party secretary Dimitris Koutsoumpas in an intervention in the Greek parliament, who warned of the public health hazard posed by the substandard working and living conditions in the fields (Hellenic Parliament 2021, 2416). Additionally, a small group of NGOs and individuals highly knowledgeable about the situation of undocumented people in Greece approached the General Secretariat of Immigration

Policy with a proposal for the regularisation of agricultural workers in the summer of 2021 (Ζώτου 2021). The initiative was revealed only later in a press conference held in November the same year (Ibid.). Neither the proposal nor the action of the migrant workers elicited a direct response from the political leadership.

Even though the Greek government did not consider a collective regularisation, it did take steps to address labour shortages, reversing in that way the situation of irregularity of some migrants. In early 2022, it stroke an agreement with Bangladesh, a major state of origin of irregular workers coming to Greece, which allows granting of work permits for nine months a year to 15,000 Bangladeshi migrants for a transitional period and then the granting of 4,000 seasonal work permits per year for a period of five years (Κατσαρός 2022). In practice, this means that a large portion of Bangladeshi irregular workers in Greece would be able to obtain permits (Interview G-7), but in an extremely restrictive manner, i.e., without a right for family unification or permanent residence. In turn, Bangladesh is obliged to accept the returns of its citizens apprehended in Greece. The idea to sign similar memoranda with Pakistan and India was also floated. Furthermore, in a move that drew widespread criticism (from NGOs, the main opposition party, Syriza, and employers' organisations), the government decided to abolish the possibility to employ irregular migrants in the agricultural sector in exceptional circumstances – only to re-introduce a temporary, more limited version of this provision in a law extending the pandemic measures (Agro24 2022; Syriza 2022). In sum, the COVID-19 crisis put some pressure on New Democracy to balance its programmatic commitment to crack down on “illegal immigration” with the need to address labour shortages in specific economic sectors amidst the pandemic, but it did not lead to a major change in the overall direction of the government's immigration policy, including regularisations.

Comparative analysis and conclusions

The Covid-19 pandemic opened a window of opportunity to “break taboos” concerning the regularisation of unauthorised immigrants. The health emergency created functional pressures to expand the limited set of rights available to this group of the population, as it exposed their vulnerability to the health and socio-economic consequences of the pandemic, as well as the reliance of supply chains on their work.

Yet, only a few governments that had previously relied on collective regularisations as a corrective device turned to this policy instrument again; and even those that did, adopted relatively stringent programmes. In Greece a collective regularisation programme was never on the table. Government measures revolved around the practicalities of irregular migrants' access to basic health services, especially vaccinations and subsequently agreements with third countries to create regular labour migration channels. In Italy, Art. 103 of Law-Decree n. 34 of 19 May 2020 created a temporary programme to regularise the status of unauthorised immigrants employed in three sectors of the economy only. In Portugal, Order 3863-b/2020, issued on 27 March 2020, granted temporary residence rights to all migrants and asylum seekers who had pending applications at the Aliens and Borders Service. Follow-up orders, in November 2020 and April 2021, extended this provision to new migrants.

In this paper, we explained variation in the adoption of such programmes, taking into account two levels of analysis: (1) *the framing* of policies, or the arguments provided by policymakers and, by extension, the most immediate reasons why they took (or not) certain steps; (2) and *drivers of policies*, or the most important contextual/explanatory factors that account for why the political environment is more permissive in some countries than others.

Regarding the first level of analysis, the most noteworthy finding is that the economic consequences of the health crisis – rather than public health concerns alone – were at the forefront of policymakers’ concerns in both Italy and in Portugal. The exact rationale was, however, quite distinct. Although both pragmatic and principled justifications were advanced, the overall framing was principled in Portugal and almost exclusively pragmatic in Italy. Whereas in Portugal a rights-based perspective was dominant – comprising not only immigrants’ right to health but to welfare protection more generally –, in Italy the main concern was the protection of supply chains. The Greek case, on the other hand, shows that pragmatic concerns related to the public health threat could be addressed through means other than a regularisation programme.

In turn, such differences in framing reflect the distinct political and institutional environments in which political actors operate. We provide an overview of these factors for our cases in Table 3 below.

Table 3. Assessment of explanatory factors by country

		Portugal	Italy	Greece
Government ideology		Left-wing government	Coalition government with left, centre, and right-wing parties	Centre right-wing government
Liberalising versus restrictionist pressures	Salience of immigration/restrictionist pressures	No restrictionist pressures: immigration is a non-salient issue	Immigration highly salient issue, with a significant drop at the start of the pandemic	Immigration relatively salient issue, with a spike right before the start of the pandemic
	Advocacy coalition/liberalising pressures	CSOs coalition pushing for the protection of migrants	Coalition of CSOs and social partners, including employers associations, pushing for regularisations	Coalition of mainly pro-migrant CSOs pushing for the protection of migrants
Institutional framework	Pre-existing individual regularisation mechanisms	Liberal individual-based regularisation system, but marred by backlogs	Individual-based regularisation possible through humanitarian permits and dual-use of slots intended for the admission of new labour migrants	Individual-based regularisation mechanisms exist with relatively strict criteria and exceptions for certain categories

Source: Authors’ own elaboration.

Because in Portugal immigration is still largely a matter of “quiet politics”, the Portuguese government is greatly insulated from restrictionist pressures. It is worth noting that, at the time of the regularisation’s approval, the far-right party Chega had only 1,3% of the vote. The left-wing government could thus afford to, on the one hand, follow up on its programmatic commitments and, on the other, listen to the claims of advocacy groups. This is in a context where the government was aware of the serious administrative shortcomings in the processing of residency applications. If the pandemic did accentuate the pressure to protect migrants, it also provided the government with an opportunity to find a (temporary) “quick fix” to administrative backlogs.

Italy and Greece have, compared to Portugal, a political environment that is less conducive to liberalising migration policies, considering the high salience of the immigration issue. However, while Greece has a government with an explicit restrictionist position, the composition of the Italian government during the Covid-19 pandemic was mixed. In such a setting, framing regularisation as a strategic measure to manage the Covid-19 and its repercussions was the most pragmatic means of achieving a regularisation outcome. The fact that such a coalition included organisations that were vocal about Italy's labour market needs is an important difference in this case. In Greece, on the other hand, the presence of an unfavourable government was combined with an advocacy coalition that perceived the political opportunity structure to be closed and did not engage in a broad regularisation campaign, focusing primarily on health concerns. When demands for regularisation of status were made this was in relation to a narrow group, i.e., agricultural workers. Even in the face of severe labour shortages, the Greek government used targeted tools (executive orders, memoranda with third countries) or inaction, in line with its political ideology and electoral pledges.

The pre-existing regularisation mechanisms also represented an important factor, though not always in the way anticipated. While it is likely the case that Italy would not need a collective regularisation programme if its legal framework allowed for functioning regularisation mechanisms, the Portuguese case shows that shortcomings in the implementation of existing regularisation mechanisms can work as drivers for the implementation of regularisation programmes. Furthermore, Portugal had the most liberal regularisation approach to begin with, so the measures taken during the pandemic did not constitute a rupture with past approaches (an additional reason why the policy steps taken were relatively "cost-free" in Portugal and would be less likely in more restrictionist contexts). In this sense, one can legitimately question to what extent these measures really broke with existing taboos.

More broadly, the significant differences across our three cases cast doubt on the enduring relevance of speaking of a Southern European model of migration, echoing earlier reservations regarding its heuristic value (Baldwin-Edwards 2012). This is not only because of the different steps taken during the Covid-19 pandemic, but also because these divergences are rooted in different approaches to migration and its regulation that developed over the last two decades. At the same time, even in cases where collective regularisation policies were implemented, these were limited in scope, temporary, "quick fix" measures. Overall, the comparative analysis of how Greece, Italy, and Portugal have regulated the status of irregular migrants during the Covid-19 pandemic suggests that the public health emergency was not a focusing event catalysing rupture or radical change. Instead, it was characterised by substantial patterns of policy continuity.

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Appendix

A1. List of interviews

Code	Interviewee (organisation)	Country	Date
I-1	Doctor in public clinics working with irregular immigrants in Florence	Italy	18.10.2021
I-2	Journalist at La Repubblica	Italy	1.12.2021
I-3	Coordinates the Dipartimento Politiche Migratorie della Unione Italiana del Lavoro (UIL)	Italy	1.12.2021
I-4	Researcher at the European Federation of Good, Agriculture and Tourism Trade Unions	Italy	17.12.2021
I-5	Local coordinator Associazione Studi Giuridici sull'Immigrazione (ASGI) Tuscany	Italy	27.1.2022
I-6	National coordinator Associazione Studi Giuridici sull'Immigrazione (ASGI) Communication Unit	Italy	3.2.2022
I-7	Promoter of the campaign "Ero Straniero" for the adoption of a new law on immigration	Italy	8.2.2022
I-8	Coordinator of the national observatory of Flai-Cgil	Italy	8.2.2022
G-1	Director, Greek Council for Refugees	Greece	10.1.2022
G-2	Executive director, Intersos	Greece	13.1.2022
G-3	Officer, Ministry of Health	Greece	17.1.2022
G-4	Gen2red Founder & Managing Director	Greece	1.2.2022
G-5	Gen2red Advocacy & Legal Coordinator	Greece	1.2.2022
G-6	Officer, NGO Metadras	Greece	7.2.2022
G-7	Researcher, Scientific collaborator at Labour Institute GSEE	Greece	21.2.2022
G-8	Researcher, Hellenic Confederation of Professionals, Craftsmen, and Merchants, Small Business Institute	Greece	24.2.2022
G-9	Officer, Ministry of Migration and Asylum	Greece	24.2.2022
G-10	Officer, Ministry of Migration and Asylum	Greece	19.3.2022
G-11	Office director, Greek Forum of Migrants	Greece	30.3.2022
O-1	Communication Officer at the Platform for International Cooperation on Undocumented Migrants (PICUM)	Other – Belgium	25.1.2022
O-2	Coordinates the study on access to vaccinations for the Platform for International Cooperation on Undocumented Migrants (PICUM)	Other – Belgium	3.2.2022
P-1	President Casa do Brasil	Portugal	9.3.2022
P-2	President Associação Olho Vivo	Portugal	30.11.2022

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