



UNIVERSITÀ DEGLI STUDI DI MACERATA

Department of Political Sciences, Communication, and International Relations

Ph.D. Course in
Global Studies. Justice, Rights, Politics

Cycle XXXIV

SIMILARITIES AND DIFFERENCES IN TWO MODELS OF POLITICAL ECONOMY

**Japanese migration policy transformations in a comparative
perspective with the Italian case**

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Academic Year
2022

Abstract

Italy and Japan share several demographic, political, economic, and social similarities (Beretta *et al.* 2014a; 2014b), including: low birth rate; rapidly ageing population; shrinking working-age population (OECD.Stat 2021); a similar political-industrial history (at least until the 1990s) (Itō, Suginozawa 2014); a large presence of small and medium-sized enterprises (SMEs) as the main national mechanisms of production; marked dualised labour market (Piore 1979); difficulties in finding native workforce willing to be employed at the lower tier of the segmented labour market; and weak welfare systems that are categorised as "familialist" (Ferrera 1996; Uzuhashi 2003; Estévez-Abe, Naldini 2016). These are only some of the most striking similarities. Of course, significant structural differences are present, too. For example, by adopting the Varieties of Capitalism (VoC) approach (Hall, Soskice 2001b) as the analytical reference, Italy and Japan belong to different political-economic systems. The first country is a Mixed Market Economy (MME) (Molina, Rhodes 2006; Hall, Gingerich 2009), while the second is a Coordinated Market Economy (CME) (Hall, Soskice 2001a), with distinct and alternative solutions for maintaining their respective comparative advantages, i.e. the peculiar characteristics of each type of market economies capable of resolving political-economic problems while being competitive in the globalised market. However, economic and demographic issues indicate a strong need, for both systems, to obtain a new workforce that can be both low-cost and highly flexible, to be able to cut production costs in order to compete with international markets.

If this kind of process already occurs structurally in Italy, for Japan it could be (not so much of) a novelty. In the course of its recent history (from the end of the Second World War to the present day), Japan has seen a scarce presence and economic contribution of foreign labour, turning out to be, in the course of the 1970s and 1980s, an alternative economic configuration with respect to Western ones. A so-called "negative case" (Bartram 2000) of labour migration. Despite being studied (and sometimes envied) up to the end of the 1980s (Nakamura 1993), even the Japanese system of industrial relations had to partially give up its atavistic resistance to the presence of migrant labour in its territory. The neo-liberal pressure brought about by globalisation, together with the demographic dynamics that had become structural to the archipelago (and in all OECD countries), forced an initial change in political attitude with the revision of the Immigration Control and Refugee Recognition Act (ICRRA) in 1989 (Brody 2002; Weiner 2003; Shipper 2008; Hamaguchi 2019a; Burgess 2020). However, this revision has been feeble compared to the real

needs of the domestic labour market as, despite the various economic crises that have followed (1992 bubble economy burst, following lost decades, 2008 financial crisis, 2011 Tōhoku earthquake, and now Covid-19 pandemic), it has never ceased to demand low-cost, flexible, and generally low-skilled labour. This is particularly pressing for the many SMEs that comprise the national production system (OECD 2020b; Toyonaga 2021): the economic entities most exposed to the difficulties set off by globalisation (Hamaguchi 2019a). This issue was again revived by yet another ICRRA amendment in late 2018, which, for the first time in Japan's contemporary history, opened a (legal) front door to medium- and low-skilled foreign workers, potentially altering the Tōkyō government's near-constant immobility on the matter and thus opening to a truly broader systemic transformative process (Hamaguchi 2019a).

The question is, at this point, whether the transformational trends underway are a sufficient trigger for the start (or continuation) of a convergent process towards other political-economic systems, with particular reference to the Italian system due to the structural similarities mentioned above. Although a real convergence is to be excluded, it is interesting to understand whether there is at least a transformative process, even in its embryonic phase, which can meet the needs of SMEs and the broad Japanese labour market, thus eradicating political immobility and veiled hostility to change.

Through a series of interviews conducted with Italian and Japanese industrial relation actors, it was possible to understand the current situation of their respective labour markets on issues related to systemic changes and the role of migrant workers. In particular, through the direct dialogue with privileged Japanese industrial relation actors, it is possible to understand the presence of a hypothetical transformative trend, potentially convergent with MME countries, especially on the topic of migration policies according to the needs of the domestic labour market.

The research results, contrary to initial expectations, have almost completely refuted the hypothesis of a forthcoming transformation within the Japanese labour market, without, however, denying the structural need for a new flexible, low-cost and low-skilled workforce. It is the scope and the (perceived) need for a further liberalising push in migration policies that are still limited. If a transformation, and eventual systemic convergence, is taking place, it is happening at an almost imperceptible speed, out of sight (and interest) of Japan's major institutional socio-economic actors.

Key words: Italy; Japan; migration policies; labour markets; Varieties of Capitalism; political-economic structural convergence

Acknowledgements

First of all, I would like to thank my supervisors. I wish to express my gratitude to Professor Emmanuele Pavolini and Professor Gianluca Busilacchi, who supervised my thesis from the first day of my Ph.D. Without them, I could not have written it. With their insightful comments on all stages of the research work, I was essentially able to improve the final version of this dissertation.

In addition to the people mentioned above, many other professors and friends have commented on parts of my work. Thanks to them, I have received valuable feedback during these three years. I would like to thank Prof. Attila Gergely and Prof. Nozomu Shibuya for their feedback and bibliography recommendations. Alberto, Rocco, Mirjam, Samantha for the numerous readings to my text.

I would like to thank all the professors and colleagues I met during the various conferences, who often provided excellent food for thought. The professors I met in Japan, and all the research interviewees who shared their knowledge and experiences. I would like to thank also to the Japan Foundation for the six months I spent in Japan before the pandemic started.

I would like to thank my colleagues, Andrea, Elisabetta and Giovanna, for the many rejuvenating chats over the past three years. In particular, my thanks go to Giovanna, for checking many times parts of the thesis and putting up with me during the most complex moments.

I thank my mother, who has always supported my life choices. Special thanks to Prof. Benedetta Barbisan, for believing in this Ph.D. course and for believing in me. It was not easy to return to the academic world, especially after many years outside it. This "interlude" has been precious and unrepeatably. In the hope that it will continue...

Abbreviations

3K	<i>Kitsui, Kitanai, Kiken</i> (Dirty, Dangerous, Demanding)
ALMPs	Active Labour Market Policies
ANSA	<i>Agenzia Nazionale Stampa Associata</i> (National Associated Press Agency)
CEFP	Council for Economic and Fiscal Policy
CEO	Chief Executive Officer
CGIA	<i>Confederazione Generale Italiana dell'Artigianato</i> (Italian General Confederation of Craftsmen)
CGIL	<i>Confederazione Generale Italiana del Lavoro</i> (Italian General Confederation of Labour)
CISAL	<i>Confederazione Italiana Sindacati Autonomi Lavoratori</i> (Italian Confederation of Autonomous Trade Unions)
CISL	<i>Confederazione Italiana Sindacati Lavoratori</i> (Italian Confederation of Trade Unions)
CME	Coordinated Market Economy
COBAS	<i>Confederazione dei Comitati di Base</i> (Confederation of Base Committees)
Confartigianato	<i>Confederazione generale dell'Artigianato</i> (General Confederation of Crafts)
Confindustria	<i>Confederazione generale dell'industria italiana</i> (General Confederation of Italian Industry)
DC	<i>Democrazia Cristiana</i> (Christian Democracy)
DEF	<i>Documento di Economia e Finanza</i> (Economic and Financial Document)
DMP	Diversified Mass Production
DPJ	Democratic Party of Japan
EPA	Economic Partnership Agreement
FIAT	<i>Fabbrica Italiana Automobili Torino</i> (Italian Automobiles Factory Turin)
FISTEL	<i>Federazione Informazione, Spettacolo e Telecomunicazioni</i> (Federation of Information, Entertainment and Telecommunications)
ISMU	<i>Iniziative e Studi sulla Multiethnicità</i> (Multiethnicity Initiatives and Studies)
FSM	Five Star Movement
FTA	Free Trade Agreement
GDP	Gross Domestic Product
HR	Human Resources
ICA	Immigration Control Act
ICRRA	Immigration Control and Refugee Recognition Act

ICT	Information and Communication Technologies
ILO	International Labour Organization
IMF	International Monetary Fund
INCA	<i>Istituto Nazionale Confederale di Assistenza</i> (National Confederal Welfare Institute)
IOM	International Organization for Migration
ISCO-88	International Standard Classification of Occupations-88
ISTAT	<i>Istituto Nazionale di Statistica</i> (National Statistical Institute)
JCCI	Japan Chamber of Commerce and Industry
JCP	Japanese Communist Party
JILPT	Japan Institute for Labour Policy and Training
JSP	Japan Socialist Party
Keidanren	<i>Nippon Keizai-dantai Rengōkai</i> (Japan Business Federation)
LDCs	Less Developed Countries
LDP	Liberal Democratic Party
LME	Liberal Market Economy
MEXT	Ministry of Education, Culture, Sports, Science and Technology
MHLW	Ministry of Health, Labour and Welfare
MME	Mixed Market Economy
MOF	Ministry of Finance
MOFA	Ministry of Foreign Affairs
MOJ	Ministry of Justice
MSI	<i>Movimento Sociale Italiano</i> (Italian Social Movement)
NGO	Non-Governmental Organisation
Nichibenren	<i>Nihon Bengoshi-kai</i> (Japan Federation of Bar Associations)
OECD	Organisation for Economic Co-operation and Development
OHCHR	Office of the High Commissioner for Human Rights
PCI	<i>Partito Comunista Italiano</i> (Italian Communist Party)
PNRR	<i>Piano Nazionale di Ripresa e Resilienza</i> (National Recovery and Resilience Plan)
PSI	<i>Partito Socialista Italiano</i> (Italian Socialist Party)
R&D	Research and Development
Rengō	<i>Nihon Rōdōkumiai Sōrengōkai</i> (Japanese Trade Union Confederation)
SBA	Small Business Act (for Europe)
SMEs	Small and Medium-sized Enterprises
Sōhyō	<i>Nihon Rōdōkumiai Sōhyōgikai</i> (General Council of Trade Unions of Japan)
TAS	Temporary Agency System
TAW	Temporary Agency Work

TITP	Technical Trainees and Interns Program
Tōzen Union	<i>Zenkoku Ippan Tōkyō General Union</i>
TPP	Trans-Pacific Partnership Agreement
TUC	Trade Union Confederation
UA Zensen	<i>Zenkoku Sen'i Kagaku Shokuhin Ryūtsyū Sābisu Ippan Rōdō Kumiai Dōmē</i> (Japanese Federation of Textile, Chemical, Commerce, Food and General Services Workers' Unions)
UGL	<i>Unione Generale del Lavoro</i> (General Union of Labour)
UIL	<i>Unione Italiana del Lavoro</i> (Italian Union of Labour)
UN	United Nations
UNHCR	United Nations High Commissioner for Human Rights
USI	<i>Unione Sindacale Italiana</i> (Italian Trade Union)
USR	<i>Unioni Sindacali Regionali</i> (Regional Trade Unions)
VET	Vocational Education and Training
VoC	Varieties of Capitalism
VoNeoliberalism	Varieties of Neoliberalism
WTO	World Trade Organization
Zenrōkyō	<i>Zenkoku Rōdōkumiai Renraku Kyōgi-kai</i> (National Trade Union Council)
Zenrōren	<i>Zenkoku Rōdōkumiai Sōrengō</i> (National Confederation of Trade Unions)

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Introduction

Italy and Japan are two advanced economy countries that have rarely been compared. During my doctoral period, I seldom found books, collective publications, and scholarly articles comparing the two countries based on the assumption of hypothetical structural or sectoral similarities which unexpectedly brought them closer together (e.g., Beretta *et al.* 2014b; Magara, Sacchi 2013). And even then, they were limited to comparing a single element at a time (e.g., the type of welfare regime (Migliavacca, Naldini 2018a; 2018b), liberalisation policies and labour market dualisation (Watanabe 2014; 2015b), growth issues (Schulz 2015), or historical dynamics over a given period of time).

Clearly, the first mechanism that brings the two countries together is negative demographic dynamics. However, delving a little deeper into the analysis, it is possible to find much more. The historical and political processes, at least until the 1990s, are strikingly similar. The defeat in the Second World War was only the beginning of an economic-industrial reconstruction path on comparable presumptions, although with alternate and sometimes different results. Politics was no less, with the dominance of a major political party for almost the entire second half of the last century and the simultaneous collapse in the 1990s. The liberalisation processes of that decade, the productive transformations, the change from industrial to service-based societies and the demographic difficulties have also determined a substantial net reduction of the working-age population, a common issue in all economically advanced societies. The domestic productive structure, is, in turn, in both cases dominated by small and medium-sized enterprises: the fundamental production engine and added value of (some areas of) the two countries. The presence of a large number of industrial districts in Italy is parallel to that in Japan, which is also characterised by the great importance of small firms in the national economy (Tolliday, Yonemitsu 2007: 29-30).¹ Moreover, they are defined by a common corporatist-"familialist" welfare structure, without a national minimum income scheme (it does exist in Japan but on a prefectural basis) and characterised by meagre social service systems.² As a consequence, both countries still belong to an

¹ Not only as subcontractors and suppliers in the classic hierarchical interaction between large and small Japanese firms. This feature will be explained later. For more on the evolution of small firms and industrial districts in Japan, see Dore (1986), Friedman (1988), Morris-Suzuki (1994) and Whittaker (1997).

² At the same time, Italy and Japan are two countries that are extremely age-biased in their welfare systems, i.e. in favour of generous pension provisions and health care, but structurally weak in anti-poverty measures for the working-age population (Estévez-Abe *et al.* 2016: 304).

actively gender-biased society, where women still play a central role in the provision of care for children and the elderly.

Even their migration dynamics, one of the topics of this research project, had an unexpectedly common history. Both countries, at least until the 1970s, were countries of emigration. Both have changed migration trends since the second half of the same decade, although at completely different speeds. From this point on, Italy and Japan began to differ substantially. Italy has had a much more direct and fluid approach to foreign labour, which became a key component of its productive mechanisms. Japan, on the other hand, has been a unique case within the OECD countries, basing its own economic "miracle" on strategies that exclude, sometimes only unofficially, the contribution of migrant workers. Certainly, Italy and Japan differ in belonging to distinct categories of market economies, characterised by different systems of industrial relations, vocational training, types of education, modes of corporate governance and inter-firm relations. Each of them, due to their political-economic characteristics and their peculiar institutional configuration, present their own comparative advantages, apparently immobile and divergent. However, the global transformations underway could call into question even this "certainty", potentially bringing these two countries, so diverse but at the same time characterised by unexpected similarities, progressively closer.

The analytical comparison between Italy and Japan and the search for a potential process of convergence, even if only limited to the context of Japanese migration policies aimed at meeting the needs of the domestic labour market, are at the heart of this thesis. To be precise, this is not a traditional comparison with a study equally divided between the two countries. It is, instead, a research work mainly addressed to the Japanese case from a comparative point of view with the Italian case, the latter seen as a potential "benchmark" for the hypothetical measurement of transformations and an ideal (or potential) point of arrival in the liberalisation of migration policies.

Central themes of the research and research questions

This thesis deals with an interdisciplinary comparative study between Italy and Japan, and it centres around several main themes:

- The Varieties of Capitalism (VoC) approach as a basis for analysing the similarities and differences in political-economic arrangements and the specific political choices made by differing institutional configurations;

- The comparison of the Welfare State and Welfare Production Regimes and the consequences they have on labour (native and foreign);
- The broader theme of migration, starting from the theory of migratory patterns, migrant workers' issues and the differing institutional configurations for the management of the phenomenon in the two countries;
- The presence of migrant labour in Italy and Japan and the migration policies related to it;
- Industrial relations in Italy and Japan, the actors involved and their role in determining and implementing migration policies with reference to the economic needs of the labour market;
- Hypotheses, related to systemic convergence and the transformation of Japanese migration policies aimed at meeting the needs of the domestic labour market, that are directed towards a model similar to Italy.

The last two points are studied in depth through a series of qualitative interviews presented in the last empirical chapter.

The main research questions that serve as a premise for the thesis are the following: is it possible to study such a complex phenomenon as the comparison of Italian and Japanese socio-political-economic systems by intertwining such different strands of literature? Does a comparison between Italy and Japan make sense at present? The more specific question is: given the similarities between the two countries, is it possible that Japan engages in a process of liberalisation of migration policies to meet the needs of the domestic labour market (and to cope with international economic pressure), adopting political-economic solutions similar to those present in Southern Europe, and in particular to those applied in Italy? Could there be a (limited) convergence between the two countries in this sense?

The hypotheses to the first two questions are affirmative, as will be demonstrated throughout the course of this work. As regards the final, more specific question, the answers are much more complex.

Varieties of Capitalism approach

Varieties of Capitalism (Hall, Soskice 2001b) is an approach to political economy studies that takes as its focal analysis the relationships, interests and strategies adopted by a wide range of (socio-) economic actors. The socio-economic actors and their political-economic actions may be diverse, but often the focus is on the events and relationships centred around governments (the state), firms

and employer associations (capital) and trade unions (labour). Although this approach is originally company-centred, it has evolved and become more complex, revealing other possibilities of analysis.

The Varieties of Capitalism approach is used as the main analytical framework for the entire dissertation. The motivations are to frame the peculiar characteristics of Italy and Japan through their respective economic institutions' configurations, productive competitive characteristics and comparative advantages in order to facilitate the comparison process. Once having these specificities defined and described how the two countries are embedded in their respective market economy clusters, including the various transformations that have taken place with respect to the original VoC typologies, it will also be possible to define the roles of the different socio-economic institutions related to individual issues, such as their policy choices and lobbying mechanisms in relation to domestic migration policies. The VoC approach has received a lot of criticism over time, e.g. for overemphasising differences in national industrial relations while underestimating the variety of sectoral industrial relations within countries (Bechter *et al.* 2012) or the insufficiency of analysis on political conflicts as a result of being too focussed on institutional complementarity and company-centred coordination (Watanabe 2014). However, the VoC approach is used here to understand the different labour market models of Italy and Japan, their similarities, differences and possibilities for convergence.

Although the Varieties of Capitalism theory assumes differing developments and results from the hypotheses of this research, its purpose is preparatory to arranging the entire analysis and evaluating theories that do not agree with its key principles. The idea that convergence is not possible (Thelen 2001) contrasts with other assumptions, for example the VoNeoliberalism approach (Cerny *et al.* 2005b), which does not exclude the possibility of convergence.

Welfare State and Welfare Production Regimes

The welfare state can be summarised as the set of social policies that protect citizens from risks and assist them in their needs related to living and social conditions, i.e. a socio-political-economic system in which the promotion of the social and economic security and well-being of citizens is assumed by the state as its responsibility. The original classification of welfare state regimes by Esping-Andersen, in which models were divided according to the analysis of the interactions and roles of the market, the family and the state in the provision of social assistance (Esping-Andersen

1990). Together with Korpi's theory of power resources, i.e. the interactions and power relations between trade unions and employers' associations in a given political-economic system (Korpi 1985), they are only the starting point of an ongoing process of categorising additional welfare combinations and schemes. The welfare state is used here as a further dimension of comparative analysis between Italy and Japan, so as to make the mechanisms linking the different dynamics addressed in the dissertation clear.

The market dynamics interactions between welfare state models and skill formation process are fundamental to understanding the mechanisms that determine the characteristics of different market economies. It is, in fact, with the introduction of the concept of welfare production regime (Estévez-Abe *et al.* 2001), i.e. the correlations between different economic institutions and labour market factors, that each country's competitive economic advantages are identified in the international market. This analysis is introductory to understanding how the different combinations of welfare regimes, labour market needs, socio-cultural configurations and production system characteristics determine not only the specificities of the two countries but also the choices of socio-economic actors in relation to more specific issues such as migration policies and the management of foreign labour.

Migration processes and migrant labour

Migration phenomena are an important socio-political-economic issue in the contemporary world. Migration is one of the most prominent analysis subject matters in numerous academic fields, e.g. sociology, economics, political science, etc., but also a fundamental element of everyday "realpolitik". It is not limited to the transnational mobility of people, but also of goods and services. It is, at the same time, a self-sustaining system determined by well-defined causal principles. There is no country, society or socio-economic context that is not affected by globalisation and, consequently, by migration mechanisms. At the same time, there are a series of structural dynamics within countries that interlace with international migratory movements. The implications for labour markets, too, are manifold, as domestic labour markets and market economy configurations go for migration processes.

From the second chapter on, the broader theme of migration, migratory processes and their consequences for the Italian and Japanese socio-economic systems will be introduced. The differing migration models are only the analytical background of another central theme of the dissertation,

namely migrant labour. The different numerical presence in the two countries is the reason for this comparison. The distinct presence (in some segments) of the strongly dualised Italian labour market (Piore 1979), compared to the scarce presence in the (dualised) Japanese one, laid the foundation for an initial reflection on the reasons for the persistence of this structural difference, despite the pre-existing similarities and the evolving socio-economic conditions. Geographical location, cultural differences and unique political-economic characteristics cannot individually explain this numerical imbalance. Nor can they predict how it will evolve in the future. A holistic view of all these elements, while keeping the role of migrant labour at its centre, is the objective of the whole theoretical and empirical analysis of this work.

Industrial relations and migration policies

Industrial relations (or labour relations) are a series of complex interrelationships between employers and employees, trade unions, employers' organisations and the state. This set of actors, especially employers' associations, trade unions and government, is decisive in so-called trilateral negotiations, in which the latter actor may have a greater or lesser degree of intervention (Cella, Treu 2009).

The issue of industrial relations and the role of the main socio-economic actors in tripartite consultation systems is central to understanding the processes that link national economic policy choices, migration phenomena and the consequences that capital and labour have in shaping the domestic socio-economic context. Labour migration and institutional actors are related by a number of features such as the type of market economy, production strategies, employer preferences, welfare system configurations, skill formation processes, the relative strength of trade unions, types of national migration management, etc. (Hall, Soskice 2001a; Toner, Woolley 2008; Menz 2009). Key actors in labour migration dynamics, with their relative power *vis-à-vis* their national governments (Menz 2009), play a crucial role in the whole political-economic process. While employer representation follows choices that are often standardised according to market needs, trade unions are faced with more complex "dilemmas" about the values to be pursued (Penninx, Roosblad 2000). The analysis in this thesis begins from the assumption that, in the Japanese case, these actors are instrumental in formulating (and maintaining) the *status quo*, which is at odds with specific labour market needs. At the same time, they are the only actors who can "unravel" this

immobility. The empirical analysis in this dissertation (chapter III) aims to understand the positions, policies and personal nuances that only direct interaction with these actors can provide.

Systemic convergence and migration policies shift

The last theme of the dissertation is that of the hypothesis of convergence, in particular of Japanese migration policies towards the Mediterranean models (the Italian model) according to domestic labour market needs and determined by the neoliberal economic pressure of globalisation. Although the concept of convergence is relatively "forced" into the research, it is an idea that serves to analyse the socio-economic processes at work within a context, such as the Japanese one, where the dynamics related to migration policies and migrants' conditions are considered controversial (Arudou 2015; Brody 2002; Shipper 2008). Japan, among the group of OECD countries, has been characterised by having an extremely low number of migrants and foreign workers in its domestic market system (Beretta *et al.* 2014a). What has often gone unnoticed, however, is the push, often hidden by "ethnic" or short-term policies, towards liberalisation not only of the labour market but also of migration policies to solve its endemic labour problems. This has materialised with the latest 2018 amendment to Japan's migration policy, due to strong pressure from SMEs and increasingly pressing negative demographic dynamics (Hamaguchi 2019a). Italy, a potential benchmark for the analysis, is a country that has always fascinated the Japanese, though at the same time is seen as a potential warning for the migration-related events that, as in other Western countries, have created "some kind of fear" due to the failed attempts at multiculturalism and social integration of migrants (Kashiwazaki 2016:10). Ultimately, the similarities between the two countries are the basis for hypothesising transformative processes in Japanese migration policies in the direction of more liberalised arrangements.

As this short introduction would like to show, the VoC approach and welfare production regimes are important contexts of analysis for this comparison, fundamental to understanding the role that migration processes and labour migration play in defining Italian and Japanese socio-economic realities. The actors of industrial relations are the crucial component in determining the past, present and future of political-economic actions in the two countries, and for possible convergence processes in Japanese migration policies on the way towards the Italian example. All these elements are interconnected, provide a better understanding of the general framework,

reinforce the basic idea of this research work and lay the foundations for future consideration and analyses on these topics.

Research design

Case selection

In this investigation, Italy and Japan were thoroughly compared. The choice of these two countries is dictated by their multilevel similarities despite their (other) conspicuous differences and geographical distance. In a nutshell, the strong similarities make Italy and Japan possibly suitable comparative cases. While in the first two chapters Italy and Japan have a roughly similar focus of examination, in the third chapter the empirical analysis is mainly on Japan, the real protagonist of the chapter. Japan turns out to be not only the focus of this examination and the potential object of hypothetical transformation underlying the thesis' research question but represents the broader framework that encompasses the dependent variables of the research project.

The assumption of this inquiry is that, at least to a defined extent, Italy and Japan are comparable. This is confirmed throughout the chapters and analytically reinforced by the literature cited. However, it should not be overlooked that the references, standards and filters of analysis are inevitably different for the two countries, and the same should be applied to the hypothesised "convergence" process. While Italy and Japan are both capitalist countries, they somewhat differ due to their socio-economic "essence", as briefly described in the previous introductory section. The inquiry of simple similarities is not enough, and it is necessary to go further, taking into consideration the intricate variables related to "culture" as well.

When it was decided to treat such a complex field of study, choices were inevitable. This exploration work does not aim to cover all aspects concerning the two countries, but only to consider certain social, political, economic and cultural aspects of comparison between them. The choices made reflect a partly personal assessment and perspective of what might be most useful and consistent in analysing the two countries based on the initial assumptions.

Actor selection

While a variety of areas of comparison are analysed throughout the first two theoretical chapters, the third chapter is based almost exclusively on the interviews and the results obtained from them. Together with the analysis of external empirical data and secondary sources, the interviews are the centre of the entire research project. The idea of using the qualitative interview methodology is aimed at adding value to a research study that, however broad and general in its overall construction, is intended to ascertain a larger process that requires further study and development analysis in the coming years. The interviews were directed to the actors of their respective domestic industrial relations, as privileged subjects involved in the mechanisms of their labour markets, workers' issues and the overall dynamics that allow the peculiar functioning of each of their political-economic systems. At another socio-political sub-level, they are the actors directly involved with the issues associated with migrant workers and potentially connected to the evaluation, creation and implementation of migration policies related to the needs of the national labour market.

The interviews conducted with Japanese actors (in Japan and online from Italy) are the focus of the third chapter, i.e., the ultimate analytical material for obtaining answers and results, however preliminary, useful for getting an idea of what is happening in Japan regarding the above-mentioned mechanisms. Keidanren was chosen as the main representative for the employer's position, while Rengō, UA Zensen, Tōzen Union and Zenrōren as privileged labour representatives. Lastly, Nichibenren as a symbolic representative of Japanese civil society involved in migrant workers' issues.

The interviews conducted within the Italian context followed the same logic as above, involving Confindustria for employer representation, and CGIL, CISL and UIL for labour portrayal. However, unlike the role that the interviews in Japan had owing to the complexity of the research, the interviews conducted in Italy (live or online) have the task of providing a better understanding of the overall context in which the comparison takes place and the potential results (and points of arrival) that the hypothetical political-economic transformations in Japan may have.

The number of interviews appears to be small. This observation is particularly true in the Japanese case, as they are essential for obtaining useful data to answer the research question. Regardless of how few they may be, the interviewed institutions are the main actors of industrial relations involved in the processes related to migrant workers, migration policies and the labour market. Their role from the socio-economic-political point of view lies basically within the framework of the overall domestic political-economic system. Ultimately, their small number does not diminish the value that direct interaction with them can have in capturing nuances, thoughts and

perspectives that can only be obtained with this kind of intercommunication. In the Italian case, since it was used as a variable for comparison and contextualisation, priority was given to the coverage of the main players involved in the topics addressed by the research project rather than their overall number.

Time frame

The time frame of this study, although very broad within its different chapters, mainly covers the last twenty years, while the empirical research material covers primarily the years 2019–2021.³ Especially in the case of the interviews, this thesis addresses an understanding of the present framework and a hypothetical formulation of future actions and political-economic transformations. Secondary sources, including those related to the actors interviewed (opinions, statements, guidelines, action policies, etc.), also have a broader time frame in order to capture the nuances that have characterised the position of unions and employer associations over recent decades.

Although the end-point of the analysis is the exact moment at which this thesis is written, the aspiration is to be able to continue this work further and which may be plausible for future years. The dynamism of events regarding migration policies and transnational processes, as well as economic fluctuations and changes in the labour market, are in turn further shaken by recent events related to the Covid-19 pandemic (Nakai 2020). Its advent has inevitably destabilised patterns already underway, without, however, affecting the structural dynamics already in place (especially demographic ones). *A fortiori*, due to the constant change in the socio-economic environment, it is necessary to evaluate this thesis as a work-in-progress study and analyse the events examined from the perspective of potential evolution.

Structure of the thesis

The thesis is comprised of three chapters, as well as this introduction and conclusions.

Chapter I introduces the theoretical framework, through an extensive literature review and a presentation of the preliminary notions related to the issues addressed in the research project. Specifically, the Varieties of Capitalism (VoC) approach is presented as the mainstay of the

³ The doctoral programme is structured over three years (October 2018-January 2022).

comparison between Italy and Japan. There are also other comparative areas, namely their welfare production regimes, the different strategies adopted by market economies and a first criticism related to the concept of systemic convergence. The chapter concludes with a brief introduction to the variable of migrant workers.

Chapter II remains within the field of theory but investigates and presents in greater depth the characteristics of Italy and Japan with a focus on migratory processes and migrant workers. The chapter is divided into three parts. The first part begins by presenting the main migration theories, the concepts related to labour migration, and an analysis of how different institutional configurations and industrial relations actors determine distinct migration flows and migration policies. It ends with an overview of the Italian and Japanese migration frameworks, presenting data on migrant workers and the political-migratory history of both countries. The second part describes the actors of industrial relations in the Italian and Japanese systems, their role within migration dynamics related to the labour market and how systemic peculiarities affect their political-economic choices. The third and final part returns to the concept of systemic convergence using the Varieties of Neoliberalism (VoNeoliberalism) approach, thus proposing hypotheses of potential systemic transformation towards other political-economic models differently from that which is theorised by the VoC approach.

Chapter III focusses on the fieldwork analysis conducted with Italian and Japanese industrial relations actors, which empirically presents hypotheses of potential systemic convergence of Japanese migration policies, according to the needs of its domestic labour market, towards a political-economic system closer to the Italian model. Throughout the chapter, descriptions of the interviews and subsequent considerations are reported extensively, with a greater concentration on the Japanese perspective. The chapter concludes with a series of inductive reflections drawn from the interviews aimed at a more detailed and in-depth understanding of the positions and political choices of capital and labour (especially Japanese). It also treats future possibilities (or expected potentialities) linked to a transformative process of national migration policies and, more generally, the country's political-economic system.

The conclusions combine theoretical analyses with inductive empirical evidence obtained from the interviews in order to make a synthesis of the main findings of this research study.

Methodology

This thesis is divided into two distinct parts: chapters I and II focus on the theoretical study of the general framework, while chapter III is based on empirical analysis, nevertheless resulting in more descriptive than analytical. This research project uses both primary and secondary sources. The first two chapters rely almost entirely on secondary sources: books, scholarly articles, and doctoral dissertations. The primary sources are based on data provided by ministries and civil society associations. The third chapter, however, relies chiefly on primary sources. Although interviews represent the core of the chapter, other sources such as national and international public statistical data, statements on the official websites of the interviewed actors, and newspaper articles are also present.

The methodology for the empirical section is based on a series of semi-structured questions, modified and adapted from time to time based on the interlocutor and the form of the person-to-person or online interview. The approach to the questionnaires, while seeking in-depth interviews with privileged subjects of domestic industrial relations, is qualitative and not standardised. The choice of utilising such a structure is dictated by the need to obtain not just a simple answer to each question, but to fully understand the different mental categories and to grasp the nuances within the dialogues (Corbetta 1999).

The search for contacts took place through the progressive use of a snowball-like technique, starting with personal knowledge at the local and provincial levels and then reaching the regional and national levels. The interviewees represent multi-level areas of different representation categories (capital and labour), even within the same organisation (local, regional and national). This differentiation guarantees some margin of "comparative potential" between the different institutional levels (Barbour 2007: 53). As regards structuring of the questions, the identification of contacts, and the way the interviews were conducted, Rubin and Rubin's approach of responsive interviews is primarily used. The objective of this research methodology is to obtain in-depth interviews that possess a certain degree of flexibility in design, providing the possibility of changing questions between and during interviews, and thus getting into the details and experiences of the ones that Rubin and Rubin call the "conversational partners". The desired outcome of this interview methodology is to ensure that the results are "fresh" and "real", conclusions "balanced", "thorough", "credible" and "accurate", and that the final report will be "rich" with ideas while trying to reflect the "world" of the interviewee as much as possible (Rubin, Rubin 2012).

The research project aims to display a comparative and interdisciplinary approach, all the while including disciplines such as political science, sociology, economics and history that investigate the commonalities and diversity of the Italian and Japanese political, economic and

migratory systems in a comparative perspective. The choice of adopting an interdisciplinary approach is necessitated by the overall complexity of the topics and subjects covered, thus seeking synthesis (and integration) in order to better understand "*the portion of the world modeled by that particular complex system*" (Newell 2001: 1-3). It is undeniable that the topics discussed, as well as the wider Italian and Japanese socio-political-economic realities, turn out to be complex systems characterised by several "*components actively connected through predominantly nonlinear relationships*", such as individuals, organisations, institutions, political parties, economic subjects, etc., which are active in their behaviours and interact in various ways among themselves (Holland 1995: 23-27; Newell 2001: 9). The use of interdisciplinarity is one of the possible synthesis solutions to achieve organicity within such complexity of the research framework.

Words of Japanese origin are transcribed using the Hepburn system, where vowels are pronounced in the same way as in Italian, while consonants follow the English reading: /ch/ coincides with /ch/ for *change*, /j/ with /g/ for *gist*, /g/ with /g/ for *gift*; finally, /h/ is always slightly aspirated and /z/ is pronounced softly. The long vowels /o/ and /u/ are transcribed with diacritical marks (ō and ū). Japanese proper names are given using the typically Japanese formula in which the family name precedes the personal name. In addition, specific terms and legislation, as well as institutions, associations and political parties are given in *kanji*⁴ (Japanese writing form) in the footnotes (or when deemed necessary directly in the text).

A final point to highlight is the role that the Covid-19 pandemic had on the objectives and methodology of this research project. The pandemic is inevitably affecting the present and future of all the issues discussed in this research. Indeed, it is impossible to imagine that it will not profoundly affect economic systems, societies and politics, now and in the years to come.

This dissertation was originally based on the principle of aiming for a certain degree of originality through empirical research based on a qualitative study and the use of in-depth interviews. However, as I found myself almost at the beginning of the dissertation in conjunction with the outbreak of the pandemic, I was unable to maintain the initial premise and the empirical share was reduced considerably. To compensate for this problem, the thesis underwent a major reorganisation in its internal proportion between theoretical research and fieldwork. These changes inevitably led to the need not only to modify the objectives and methodology of the research but also the questions to be answered. Lastly, the originality of the research also changed with the transformations undergone in the course of this work: since I no longer had the possibility to deeply

⁴ *Kanji* (漢字) are characters of Chinese origin used in Japanese writing. They are used in conjunction with the syllabic scripts *hiragana* (ひらがな) and *katakana* (カタカナ).

investigate the fieldwork, increase the number of interviews and possibly deal with participant observations, I tried to give originality to the theoretical component, intertwining the literature and reasoning critically on all the different topics covered within it.

Objectives of research

This thesis has three overarching aspirations. The first is to create a more systemic work of comparison between Italy and Japan, a theme generally little addressed in current (and past) literature, bringing the two countries closer socially, politically and economically while not limiting itself to a comparison of cultural diversity. The second is to use the filter of industrial relations to approach the main Italian and Japanese socio-economic institutional actors in order to understand in-depth political positions and ideological perspectives not directly covered by the literature, using the "pretext" of comparison to bring these two different sets of institutional actors into contact. The third is to understand how far political-economic and social transformations have come in Japan, as well as to explore how much the prospect of change is considered by the Japanese institutional actors and how far migration-related transformations are possible.

Chapter I: Preliminary notions, literature review, and introducing the migrant worker variable

1. Introduction

In the current literature, Italy and Japan are being considered as rather similar countries but, at the same time, different in many other features. This comparison is most often approached through a cross-regional perspective that takes as examples different classifications of economic and social policies (like the Varieties of Capitalism⁵ perspective and the social protection/welfare state models).

Taking their socio-structural factors as examples, Italy and Japan (as well as South-Korea) may be counted among the countries with the lowest birth rate⁶ of the Organisation for Economic Co-operation and Development (OECD) countries, while at the same time they both appear (along with Germany) at the top of the list of those with the most aged national population (OECD 2020a).⁷ A direct consequence of these two structural features is the net reduction of the working-age population (aged between 15 and 64 years),⁸ notably in sectors which have traditionally employed flexible, low-cost, low-skilled workers. Besides, due to the peculiarity of the Italian and Japanese industrial structure (i.e. formed by a plethora of small and medium enterprises, if not very small or of family business dimension), both labour markets have always had a strong need of such an unskilled and flexible workforce in order to reduce production costs and to counter the competitive pressure of neoliberal globalisation regimes. Furthermore, Italy and Japan are very

⁵ VoC from now on.

⁶ Migliavacca and Naldini call Italy and Japan "lowest-low" countries as regards fertility rate (Migliavacca, Naldini 2018a: 3).

⁷ The demographic projections for Italy and Japan are equally negative. In the Italian case, the expected resident population is estimated at 58.6 million in 2045 and 53.7 million in 2065 (under the median scenario). The loss with respect to 2016 (60.7 million) would be 2.1 million residents in 2045 and 7 million in 2065. Taking the variability associated with demographic events into account, the 2065 population estimate ranges from a low of 46.1 million to a high of 61.5. The probability of a population increase to 2065 is 7%, while the natural population balance draws partial relief from migration (ISTAT 2017). In the Japanese case, population in 2015 was 127.09 million, including non-Japanese residents. Through the results of the national medium-fertility projection, it is projected to reach 110.92 million by 2040, drop between 100 million to 99.24 million by 2053, and drop to 88.08 million by 2065.

⁸ Despite this similarity, the employment-population ratio between the working-age population of the two countries is very different. According to 2020 OECD data, Italy has a ratio of 58.1%, while Japan is well above, with a ratio of 77.3%. The OECD average is 66.3% (OECD.Stat 2021c).

similar owing to their very low worker replacement rates,⁹ due to their analogous employment protection policy (Estévez-Abe *et al.* 2001), and their very high public debts, among the highest in the world (International Monetary Found 2021).¹⁰

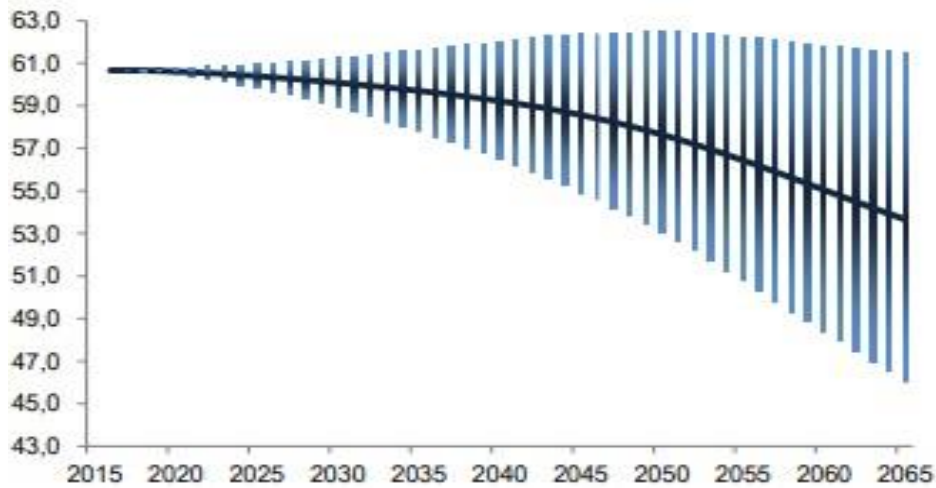


Figure 1.1. Italian resident population - median scenario and 90% confidence interval. Years 2016-2065, data in millions (ISTAT 2017: 1).

⁹ In 2006, it was predicted by the Japan Institute for Labour Policy and Training (JILPT) that if the worker participation ratio continues at the same declining rate as in 2006 (66.57 million workers), it will have lost 10.7 million workers by 2030 (55.84 million workers) (JILPT 2006, in Yamada 2010: 5).

¹⁰ Japan ranks first (256.9% of GDP), while Italy ranks sixth (154.8% of GDP), the second country in Europe after Greece (206.7% of GDP) (International Monetary Found 2021).

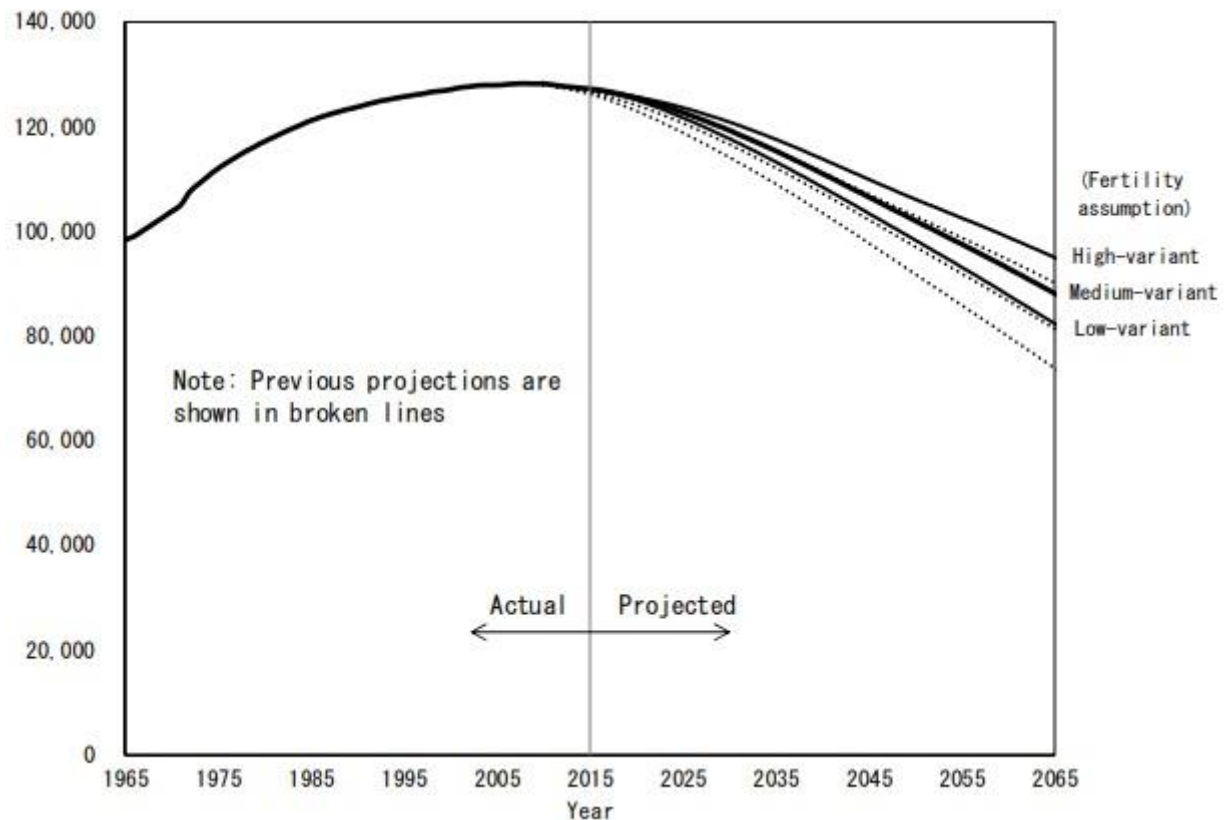


Figure 1.2. Actual and projected population of Japan: medium-, high-, and low-fertility (medium-mortality) projections. Population Projections for Japan (2017): 2016 to 2065 (National Institute of Population and Social Security Research 2017: 21).

Three labour market sectors are heavily suffering due to the shortage of flexible, low-cost and low-skilled (or unskilled) workers, and, at the same time, are facing all-encompassing challenges like globalisation, ageing society, neoliberal pressures and the transformation to a knowledge-based society, and these phenomena are transforming each society and market in their internal socio-organisational structures:

The first sector is that of manufacturing. This is a key production sector that was the major economic driver of modern and contemporary societies until the second half of the previous century. One of the main issues in the sector is the progressive process of over-education of the indigenous young population. It couples with problems of low economic growth, low competitiveness against global pressures (especially in the Italian case) and high production costs, even if both countries are slowly regaining a positive level of GDP (in an analysis prior to the Covid-19 pandemic). Moreover, the two countries are politically, economically and socially still dealing with the de-industrialisation process which has affected all advanced economies countries since the second half of the twentieth century, as well as with the advent of digitisation and smart working technologies, albeit in different ways and at a different pace.

The second sector is that of healthcare,¹¹ such as child care, elderly care, etc. As a consequence of the ageing of the Italian and Japanese populations and their corporatist-"familialist" welfare structures, the link between healthcare work and women's labour is still "indissoluble" (Uzuhashi 2003; Estévez-Abe, Naldini 2016; Migliavacca, Naldini 2018a; 2018b), even though it may seem somehow anachronistic. This sector is particularly interesting because it presents similar problems in both countries (as well as in most OECD countries), caused by the already mentioned demographic structural phenomena as well as by welfare systems strongly conditioned by monetary transfers and allowances to families, though meagre in their arrangements. In addition, care and domestic work sectors require a large number of low-skilled and low-cost workers to keep costs down: it is expected that such high demand for care workers will keep increasing, given trends for the ageing population, the rise in female participation in the labour force and the marked increase of recipients in retirement age (notably female) (Fellini, Fullin 2018: 322-323). However, due to cultural¹² peculiarities (Bartram 2000) and different political choices from the post-war period to the present time (caused by divergent political paths and dissimilar continuity of government history in the 90s), the care sector probably presents the greatest divergence when comparing the two countries.

The third sector considered in the current post-industrial socio-economic transition is the service sector. In particular, the most affected area is that of the consumption service sector (e.g. trade, catering and food services), based on various criteria such as different regulations of each labour market (e.g. the rise of new types of atypical jobs, etc.). The transformations that affect this market area are still in motion and evolving at a fast pace, thus, for this reason, they are the most fluid and complex to analyse.

Within the VoC perspective framework (Hall, Soskice 2001b), Italy represents the case of a typical MME (Mixed Market Economy, alongside, for instance, France and South Korea), where the state plays a prominent role in the economy, and government mediation is crucial within the industrial relations system (Hall, Gingerich 2009). On the other hand, Japan is often represented as a classical case of CME (Coordinated Market Economy, alongside, for example, Germany), where it is essential to have a high level of market regulation and strong industrial relation coordination between capital and labour. This differentiation, as will be explained in this chapter, is incomplete

¹¹ Healthcare is defined as a job that requires face-to-face interactions with children, the elderly, or people with complex health care needs. It is generally considered to be an under-skilled occupation whose wages are very low on average (England *et al.* 2002; Folbre 2012). Care work is often conceptualised within a transnational (or "global care chain") labour market. Migrant women from economically weaker countries tend to be employed in economically affluent countries, mostly on a temporary basis, in lower paying service jobs (Hochschild 2000; 2001).

¹² The concept and term "cultural" will be used as little as possible to avoid the "trap" of cultural determinism.

and inaccurate, especially in the Japanese case. Such inaccuracies, however, may also foster mutual similarity between the two countries.

At the same time, the distinctive institutional complementarities that are part of the determinants of market economies are increasingly weakened due to phenomena such as globalisation, neoliberal pressures and new production methods. Each government, since the nineties, in response to these transformations and external pressures has introduced a series of political and economic structural reforms towards deregulation of the labour market and liberalisation of services. These political and economic changes are driving a process of convergence of economic and social policies in many industrially developed countries, diverging from what has been presumed by the VoC theory (for instance, see Howell 2003; Cerny *et al.* 2005b; Pontusson 2005; Heyes *et al.* 2012; Watanabe 2014).

Other similar characteristics lie within the industrial fabric, as in both countries most enterprises are small and medium-sized (SMEs).¹³ Consequently, both countries have similar arrangements in labour market regulation, such as a solid regulation for core regular worker contractual protection, and they both present a heavily dualised labour market: Italian and Japanese labour markets are characterised by a clear separation of labour in an upper, more secure range for regular workers, and in a lower, less socio-economically protected level for non-regular workers. This labour market separation is very well described in the "dual labour market" theory (Piore 1979): the "segmentation" within the labour market is between a primary sector outlined by the socially protected, high-waged employees with secure, open-ended jobs, to which native workers generally belong; whereas there is a secondary sector, characterised by low wages, poor working conditions and low level of social protection, mainly made up of migrant workers (or other vulnerable groups such as women, the elderly and young workers).

The process of deregulation under neoliberal globalisation pressure has proved to be an important landmark. This transformative process has been the main driving force for the revolution of the labour market and industrial relations stakeholders, as well as the increased demand for labour flexibility and differentiated composition. According to political economy studies, one of the main problems prompted by globalisation concerns the stability of regulatory regimes and national institutions in the light of increased competitive pressure (Boyer, Drache 1996, in Hall, Soskice 2001a: 55). Paradoxically, considering that Italy belongs to the category of MMEs (Hall, Gingerich

¹³ To be more precise, in 2011 Italy had ten percent fewer establishments than Japan. Size growth in establishments has been faster in Japan than in Italy, especially in the second half of the last century. Again, in the distribution by size, Italy had fewer establishments than Japan, particularly in establishments with at least ten employees (5% versus 20%). The same value, albeit to a lesser extent, is also present in those with more than fifty employees (2.8% vs. 0.6%) (ISTAT 2011; Chiesi 2013; Dore 2013b).

2009) and Japan to that of CMEs, it would be expected that this pressure exerted by international production competition would be stronger in Italy. Instead, despite strong drives to deregulate the Italian labour market in recent years (for instance with the Monti government and the centre-left Renzi government), it seems that Japan is the country that has been moved more by this transformation (Watanabe 2015a; 2015b; 2018). The political events of the past three decades have shown a slow erosion of the strong Japanese system of labour protection granted to regular workers, and from the Koizumi governments (2001-2006) it has expanded the employment of temporary labour, non-regular workers and use of *haken*¹⁴ labour (workers employed by temporary agency work, or TAW). Distinct power resources models, which include different institutional complementarities, the power and role of labour unions and the partisan composition of national governments¹⁵ have been instrumental in creating this apparent paradox.

Lastly, the variable which may have been decisive for part of the differences between these two countries is the presence (or relative absence) of migrant workers. Although migratory phenomena and the presence (or absence) of migrants in the national labour market are generally overshadowed (or even ignored) by some political economy comparative studies (Freeman 2004), it is interesting to analyse how the presence of migrant workers may be an explanatory variable for the different types of capitalist institutions, level of involvement in industrial relations and government choices in economic policy (Afonso, Devitt 2016: 592). Moreover, this potential variable could help understand future institutional changes and transformations in a world which is now hyper-globalised.

In the Italian case, employment of migrant workers (from wide-ranging geographic areas)¹⁶ has been a common feature of the manufacturing sector and, recently, also in the care and service sectors (Afonso, Devitt 2016; Fellini, Fullin 2018). In Italy, as in the rest of Western European countries, migrants display a structural component of the entire employment system, representing more than 10% of the national workforce (Fellini, Fullin 2018: 293-294). Japan, on the other hand, has historically been insistently refractory to allowing workers to enter from abroad and, as a result, the percentages are extremely modest (in 2018 foreign workers in Japan were 1.4 million,

¹⁴ In Japanese 派遣.

¹⁵ Among the similarities, it should be remembered that since their common post-war history, government majorities in the two countries have been, at least until the early 1990s, dominated by the centre-right parties, with the Christian Democracy (DC) political party in Italy and the Liberal Democratic Party (LDP) in Japan (which, differently from Italy, has continued to rule Japan with brief and sporadic exceptions such as the government of the Democratic Party (DPJ) of Prime Minister Hatoyama from 2009 to 2012). Even the electoral system, from the beginning of the 1990s until the reform of the second Berlusconi government in Italy, was similar, consisting mainly of single-member districts.

¹⁶ Italy has a long history of labour migration not only from foreign countries, but also of internal migration, especially from the South to the North of the country.

accounting for 2.23% of the total workforce, whereas foreigners represented 1.99% of Japan's total population (OECD 2019b)). However, this trend is slowly changing even in Japan due to the pull potentialities of the 2018 Immigration Law amendment and to the political pressure of various national employers' associations (Hamaguchi 2019a),¹⁷ even if the migration policy reform does not seem to be able to provide the necessary numbers required by these economic sectors.

The partial objective of this thesis is to try to answer these key questions:

1 - why in Italy and Japan, despite very similar structural dynamics and socio-economic issues, is the difference in the presence and employment of migrant workers so evident and,

2 - will, in the (near) future, there be any kind of convergence process between the two countries?¹⁸

In particular, taking the Varieties of Capitalism framework into consideration, whether it is possible that a coordinated market economy like Japan can present trends of convergence towards a mixed market economy like Italy.¹⁹ In order to achieve these answers, it is interesting to adopt a cross-regional approach, by comparing Italy and Japan in different research areas and analysing various topics, from welfare regimes (Ferrera 1996; Uzuhashi 2003; Estévez-Abe, Naldini 2016; Migliavacca, Naldini 2018a; 2018b), labour market deregulation processes (Watanabe 2014; 2015b), skill formation arrangements, training regimes and social protection processes (Estévez-Abe *et al.* 2001; Estévez-Abe, Naldini 2016), to different national migration policies (Afonso, Devitt 2016).

There is also a growing research body in political science, sociology and economics addressing how immigration may reshape socio-economic institutions (welfare states, industrial relations and skill production processes), but this kind of literature rarely involves expressly with frameworks mapping diverse models of capitalism (Freeman 2004: 953; Afonso, Devitt 2016: 592). Besides, it is even more difficult to find specific comparative research between Italy and Japan on socio-economic topics, such as the labour market, welfare institutions and industrial relations dynamics (for some, rare examples, see Magara, Sacchi 2013; Beretta *et al.* 2014b; Watanabe 2014).

This project also aims at analysing changes in the labour market from different points of view, using a macro approach for general comparison and a more specific one for particular, micro

¹⁷ Caviedes hypothesizes that the willingness of employers, which is channelled into national or sectorial employers' associations, is the most important element in the creation of migration policies directly linked to the national labour market (Caviedes 2010).

¹⁸ This is the main objective of the first part of the dissertation. All the research questions set out in the main introduction will be addressed in the course of the dissertation.

¹⁹ These specific trends will be explained throughout the chapter.

dynamics. To do so, a series of interviews were conducted²⁰ with a certain proportion of the participants involved in Italian and Japanese industrial relations, specifically representatives of trade unions and employers' associations, as well as NGOs interested in migrant worker issues, various actors in these fields of expertise and workers. Questions focussed on differences in labour market dynamics, the role of political actors in the respective industrial relations regimes, labour market changes considering several ongoing processes, the future prospects on the different issues and the function of migrant workers in overall national systems. Finally, all the interviews and the empirical research were analysed using data provided by major international databases.

To conclude the introduction to this chapter, I refer to Frey's words to justify, hopefully also to enrich, the choice to compare from the point of view of capitalism models in two countries so distant, but at the same time so important in the world economic panorama: "*A more comparative stance that goes beyond the United States would be a useful check of how general the results are. Scholars should not forget that while the US is the dominant economy today, there are 195 nations in the world that offer many fascinating institutional variations, which are useful to take into account*" (Frey 2010: 65). This thesis is an attempt at developing an interdisciplinary piece of work, engaging political science, sociology, economics and history, with the aim of finding what brings these two countries closer (and what makes them move apart), all within a comparative perspective.

1.1. Theoretical notions and literature review

Before starting with the theoretical section of the thesis and the related literature review, it is to be noted that Italy and Japan are two well-defined and well-known countries in Varieties of Capitalism

²⁰ Regarding Japan, interviews were structured with a series of twelve questions, different for each socio-economic actor, primarily concerning the role of the specific institution in today's Japanese economy (for UA Zensen its sectors of reference), a question about their opinion on the process of liberalisation and deregulation of the Japanese labour market, a question regarding the rate of unionisation/involvement of its members, a question about the development and the future of the Japanese labour market in the light of the ongoing structural changes (low birth rate, ageing population, shrinking of working-age population), a question on the role of technology in their specific sectors (or concerning their members), a question on the temporary employment agency system and their overall role in the changes taking place in the Japanese labour market, a question on their views on the new immigration law that came into force last year and their active role in shaping the law, a question regarding their opinion on the role of migrant workers and the consequences of their presence (and increase) in the Japanese labour market, a question about their role in the Japanese tripartite system and, lastly, a final question on their relationship with the current (and previous) government. The questions varied according to the interlocutor, with changes in structure and content, but the common thread of the different interviews was the one just outlined.

studies.²¹ Italy and Japan have been analysed in depth over the years, while their political-economic and structural evolutions, paradoxes and transformations have been comprehensively studied. According to VoC theory, different combinations of institutional complementarities, such as welfare systems, financial markets, types (and quality) of relations between firms and corporations (level of coordination), educational systems, employment regulations, skill training regimes (and so on), form different types of economic capitalism with distinctive traits (Hall, Soskice 2001a). This means that different economic systems are characterised by different institutional complementarities too, which in turn have specific political-institutional concomitants and a degree of socio-economic stability. This stability is, vice versa, defined by consistent political-economic strategies and behavioural patterns (Hall, Soskice 2001a; Storz *et al.* 2013). This classification, which is adopted in distinct and sometimes fluid clusters of countries, is particularly relevant because it explains both the exact features of each type of economic capitalism (and their peculiar specialisations), as well as the different competitive advantages at every economic and institutional level (Boyer 2005).

To be more accurate, there are also opinions and theories that deny and criticise the VoC approach, for instance Crouch's analysis of the uniqueness of different countries. Crouch states that all nations, to a certain degree, present their peculiar and unique socio-economic configuration, and consequently cannot be limited and framed in ideal typical models (Crouch 2005; Crouch, Streeck 2006; Becker 2007). At the same time, there are critiques of the VoC principle in which differences between regimes are bound to remain (and increase) in light of the comparative advantages of each regime, denying any possibility of convergence despite the neoliberal pressure for globalisation (Howell 2003; Cerny *et al.* 2005b; Pontusson 2005; Heyes *et al.* 2012; Watanabe 2014).

The next sections review the theories and literature on the VoC approach in order to frame the specific socio-political-economic characteristics of Italy and Japan. The VoC approach is propaedeutic in facilitating the systemic comparison between these two countries.

1.1.1. Varieties of Capitalism approach

Hall and Soskice's VoC approach was originally developed in order to build a new theoretical framework that could be helpful to more completely and comprehensively understand the different

²¹ And their institutional comparative political economy agenda, defined as a "*diverse set of approaches and analytical frameworks (which) [...] compare how institutional diversity impacts economic performance outcomes across advanced industrial relations*" (Hall, Soskice 2001a: 6; Amable 2003; Deeg, Jackson 2007: 149-150, in Afonso, Devitt 2016: 593).

institutional similarities and differences among developed market economies. This kind of analysis, after all, is one of the basic purposes of comparative political economy (Hall, Soskice 2001a).

This approach aims at considering each political-economic system as a set of interrelations among rational economic actors that interact with each other in a logical and strategic way. These actors are manifold and include firms (capital), employers' associations, trade unions (labour), governments (state), various other types of socio-economic institutions, organisations and influence groups, all the way up to the (socio-economic) dimension of the individual.

Hall and Soskice identified firms as the focal subjects in political economy relations within the capitalist economy system. Firms have the central role of influencing all levels of economic performance (Hall, Soskice 2001a). Firms, in turn, have to solve many coordination problems, thus they have to consider several relationship patterns, called spheres: these circumscribed areas are, for example, industrial relations, corporate governance,²² corporate finance, internal relations within the firm (employer-employee relations), coordination with other firms (inter-firm relations), vocational training regime and the type of national education system. These kinds of interactions within a socio-economic national system create specific structural uniqueness that the authors initially identified in two emblematic distinctions, namely the "coordinated" market economies (CMEs) and the "liberal" market economies (LMEs). This labelling has determined the creation of two distinct ideal types, although over the years they have become only two exemplary models within a more varied spectrum of possible political-economic combinations. CMEs and LMEs are only two extremes in a variety of capitalisms, while in-between there are diverse systems that are functional to their unique socio-economic needs and (probably) more suitable to the peculiar characteristics of their national market economy (Hall, Soskice 2001a: 6-9).

To sum up, these two diametrically opposed institutional settings are based on the principle of comparative (and competitive) advantage. According to Hall and Soskice, the diversities of capitalism, in the face of the strong thrust of globalisation, are bound to strengthen and not be induced into any kind of convergence, due to the competitive advantages of each specific economic institutional (complementarity) arrangement. The role of capital and its representations, business associations, also prove central and functional to the categorisation of political-economic strategies across clusters (Hall, Soskice 2001a: 54-60; Ido 2013: 128).

The next section will illustrate the main differences between the two antithetical, but not solely, market economy systems that determine a country's type of capitalism: the aforementioned coordinated market economies (CMEs) and liberal market economies (LMEs).

²² Interpreted as a series of relationships between principal owners and acting managers in large corporations (joint stock companies) (Dore 2013b: 26).

1.1.2. Classic examples of the VoC approach: CMEs vs. LMEs

As stated above, major market economies can be summarised, at least preliminarily, by the categories of coordinated market economies (CMEs) and liberal market economies (LMEs). These two categories constitute the theoretical basis for the introduction of VoC theory and can provide the essential notions for the comparative analysis between Italy and Japan as well.

The first variety of capitalism described here is the coordinated market economy: its key feature is the strong dependence in non-market relations as its fulcrum for market coordination among all socio-economic actors, so that it encourages a series of strategic interactions that are indispensable in seeking competitive outcomes at the national and international level. In short, in a CME system subjects look for the ability to strategically and efficiently coordinate production mechanisms, which is deemed its main competitive advantage strategy (Schröder 2009).

Another characteristic of a CME is that investments are not only based on the simple purchase of new production-oriented machines and technologies, but on an overall social investment in personal skills and a keen approach to broader relational systems (intra-firm and inter-firm), thus creating several strategic interactions at different socio-economic levels. This degree of coordination is possible due to the presence of supportive institutional actors that facilitate these sorts of processes. Generally, incomes are more equal than in other types of market economies (at all labour market levels), and typically have longer working hours (with fewer attempts at instigating labour policies that aim to reduce them).

In Hall and Soskice's theoretical spheres, industrial relations and the role of trade unions in them are specifically meant to "counterbalance" the capital, embodied by employers' associations. Labour markets (and production systems) are structured to have and keep a great number of highly-skilled workers. Therefore, labourers could conceivably be able to have enough bargaining power and hence be capable of shifting the balance in labour relations by "selling" their skills elsewhere (the so-called "portability of skills").²³ Due to a high level of unionisation (at least higher than LME systems), regular workers' high contractual security and a general level of fairness in wages determined by a strategic division of competencies, in CMEs trade unions and employers' associations could smoothly do the whole bargaining process by themselves. In some cases, negotiations take place with the support of workers' representatives through works councils.

²³ However, "portability of skills" is supposed to be a feature more common to LME systems.

As previously stated, relationships within and outside the economic actors play a key role in coordinated market economies: for instance, corporate and financial governance are based primarily on corporate inter-relations, information networks and an adequate inter-company monitoring system often associated with mutual trust and transparency. These arrangements allow investors to carefully control a firm's economic performance. Differently from the purely economic competitive framework of LMEs, coordinated strategic arrangements afford companies to have the necessary capital to retain highly qualified workers in a long-term perspective.

Internal relations within the firm (employer-employee, but also employee-enterprise union) depend on each corporate governance system and industrial relations model. Indeed, in CMEs it is difficult for employers or company boards to make decisions without consulting or negotiating with workers and trade unions, thus requiring the implementation of the principles of mutual trust and a network of structured information. Inter-firm relations are the premise and the centre of CME relational processes: they are assisted by a supportive institutional context, alongside a large number of trade and industry associations, made up of public institutions devoted to the promulgation of economic investments and research for innovation.

Education, vocational training and skills formation are important areas of these market economies. Since a CME production system is strongly oriented towards investing in employees with high, specific skills, its labour market creates a demand for training policies that can meet firms' needs. Trade unions, employers' associations and business advance political pressure on governments to obtain definite training and vocational programs. In CMEs, it is possible to find a higher involvement of all actors in the definition of training processes and contents. Education and the labour market are intertwined, even though it is important to consider the political pressure of trade unions and workers' associations to protect their members.

The strategies adopted on the employer side differ considerably by type of market economy, and it is central to identifying the countries' comparative advantage of their institutional arrangements. This distinction is thus determined by the different national systems of corporate financing. CMEs are characterised by long-term strategies and a bank-based financing system (as in the Japanese case), while LMEs are characterised by short-term strategies and reliance on financing through stock-based market systems (Hall, Soskice 2001a: 17-21). The preferences of managers are also influenced by the type of political-economic regime. They are fundamental in understanding the different needs towards investing in high or generic skills, thus determining the degree of cooperation between labour and capital (and the overall quality of industrial relations).

Countries that typically belong to the CME category are Central and Northern European ones, like the Scandinavian countries (Sweden, Norway, Finland and Denmark) and Continental countries, i.e. the Netherlands, Belgium, Austria and, most importantly, Germany. Germany is generally reputed as an archetype of CMEs. The type of production that best suits this particular economic system is generally found in the manufacturing sector, such as in the production of factory equipment, machine tools, consumer durables and specialised transport equipment (Hall, Soskice 2001a: 19-21; 39-44).

The second variety of capitalism described here is the liberal market economy: in LMEs market relations are highly competitive, hierarchical, placed within specific market arrangements. Firms tend to have more confidence on liberal market mechanisms (Witt, Jackson 2016: 780-781), where the market is the regulatory framework for any process or relationship. In sum, market allocative efficiency is an LME's distinctive comparative advantage (Schröder 2009).

Analysing Hall and Soskice's theoretical spheres, an LME industrial relations system can be described as being characterised by a much lower overall cohesion, also due to an extremely low unionisation rate in which the bargaining power of trade unions is limited and (presumably) sector-related. The market itself requires a high rate of fluidity of goods, technologies and labour. Hence it is less important to have worker's protection guarantees through collective bargaining or with labour political participation through works councils (which are generally absent or not relevant).

Corporate and financial governance is also market-oriented, where the role of management is much more important: unlike in CMEs, networking between companies is irrelevant or at most limited. As a result, internal relations within the firms are smoother, sometimes even disconnected and heavily top-down. Even inter-firm relations are dominated by market dynamics, also thanks to an institutional framework largely oriented towards anti-trust regulations and a general easing of contractual rigidity.

The last theoretical sphere, education, is very far from the CME model: it entirely depends on the volatility of the labour market, while its generic skills demand determines their easy transportability from one company to another. Employment contracts' duration is generally shorter and vocational training is based on the development of general skills, which are better suited to the fluid and competitive dynamics of the liberal market. Specific skills are commonly obtained after entering into the labour market: the responsibility for their acquisition and development entirely depends on the individual and his or her individual interests. The entire education sector appears to be less specific and less coordinated, though its maintenance costs are lower. The scarcity and

weakness of LME industrial relations apparently do not create any sectorial obligations or any particular business interests.

Countries that represent this category are notoriously the Anglo-Saxon ones, including the USA, Great Britain, Australia, New Zealand, Canada and Ireland. In the case of LMEs, the USA is the most representative example of a liberal market economy. Its characteristic productions are microelectronics and biotechnology, but also corporate finance and the whole service sector (such as entertainment, commercials, etc.).

Industrial differences include another important point of differentiation between these two models, in particular in their institutional comparative advantage: CMEs are identified with incremental innovation models, whereas LMEs with radical innovation models. According to Hall and Soskice, firms within specific economic arrangements have greater competitive advantages in adopting distinct economic (and/or financial) activities and producing certain goods. Therefore, it also changes the institutional support they can obtain and, thus, their overall efficiency. Trade is another important variable in these national and international processes (Hall, Soskice 2001a: 38-44).

The innovation process is a further cornerstone of the Varieties of Capitalism approach. In the following section, the determining strategies of the main models of innovation, the incremental innovation and the radical innovation will be analysed.

1.1.3. Comparative advantages and competitive arrangements: Incremental Innovation vs. Radical Innovation

As mentioned in the previous section, market models and specific comparative advantages play a fundamental role in defining a firm's economic choices, and they determine national political-economy strategies. An important role is also performed by the type of innovation arrangements that frame a firm's actions. Innovation strategy, on the other hand, helps define internal market mechanisms in terms of comparative advantage and economic success. Among market economy systems two main types of innovation arrangements are at play, namely incremental innovation in coordinate market economies and radical innovation in liberal market economies. They constitute the archetypes of innovation strategies aimed at obtaining comparative advantages in the economic and productive peculiarities within the different varieties of capitalism.

One of these arrangements is incremental innovation: its main aim is to maintain the overall competitiveness in the production of goods and services. In order to achieve this result, it requires constant and protracted updating processes of workers' skills and a firm's technology assets and strategies, while maintaining its standard quality levels. At the same time, whoever applies this kind of innovation is constantly trying to limit production costs. This type of innovation is generally adopted in CMEs as this model of market economy tends to have a greater progressive economic and production constancy. It is more likely that in this arrangement employment and contractual safety is more protected, thus creating incentives for workers to stay in the same company or industry. This mechanism is a consequential behaviour in economic systems where skill formation processes are defined on the basis of production framework (mainly firm- or industry-specific).

Hall and Soskice identify greater feasibility of applying this sort of innovation model in corporatist systems, where workers have securer employment, greater working autonomy, a corporate governance system that precludes hostile economic dynamics (for instance companies' unfair worker-poaching strategies) and a higher degree of worker participation in company decisions (with the presence of cooperative arrangements like works councils and labour participation in decision-making processes). Corporatist countries' training system helps provide specific firm- or industry-based skills, while inter-firm collaborations facilitate customers and suppliers to expect incremental improvements. Lastly, these coordinated regimes tend to encourage production dynamics based on goods and service differentiation, in order to compete with the intense international economic competition (Hall, Soskice 2001a: 38-44).

The alternative innovation arrangement is radical innovation. It is based on completely different procedures other than incremental innovation and is usually placed within an opposite institutional framework. In fact, in LME systems, inter-firm (and worker) competition is the essence of its comparative advantage. This implies the presence of an extremely fluid labour market, where skill formation and training processes are structurally supported by a generalist type of education. The marketability of the worker is determined by his economic adaptability, and this particularity gives the responsibility of adapting to market economic needs to the individual. At the same time, employee participation in company choices is much lower (if not non-existent), while worker protection is very low (as well as the rate of union representation). Individuality, fluidity, adaptability are features that distinguish this economic framework, making the mobility from company to company a common market mechanism. As the term "radical" suggests, the production of goods (and services) can be entirely changed abruptly, thus requiring workers to acquire new sets of skills at every production change or economic fluctuation. Besides, in these economic

arrangements, corporate governance is generally not implemented and inter-firm relations are directed towards economic competition. Liberal market economies' legal barriers favour competition and the pursuit of profit, while corporate organisations' decision-making power is usually concentrated at the top management level of the company (Hall, Soskice 2001a: 38-44).

However, it is not only innovation arrangements that determine the differences in the various political-economic systems, but also other institutional characteristics that contribute to the formation of models that result in distinct clusters of countries.

1.1.4. Additional diversification patterns (and exceptions)

The VoC literature is no longer restricted to classification patterns that include only causal identifications to production mechanisms. For example, it is common to adopt Esping-Andersen's welfare state²⁴ regimes approach (and its successive modifications).²⁵ The integration and interaction between these two approaches allow a deeper understanding of inter-regional causal connections and a better comprehension of socio-economic diversification dynamics, also within a macro-historical perspective (Schröder 2009: 19-20).²⁶

Besides the fact that the VoC model focusses on the interactions of firms within different institutional frameworks, the Esping-Andersen classification model centres on the different welfare

²⁴ It is important to define what the welfare state is. Although a universally accepted definition of the welfare state does not exist, it is commonly defined as the set of social policies that protects citizens from risks and assists them in needs relating to living and social conditions. The term is also used in a broader sense to define an orientation of the state and/or social institutions to protect and promote the economic and social well-being of citizens, based on the principles of equal opportunity, fair distribution of wealth and public responsibility for the most vulnerable citizens (Encyclopaedia Britannica Online 2020b). In a relatively narrow sense, used in particular in the economic sphere, the term "welfare state" refers to the set of social policies, i.e., those public policies aimed at satisfying social needs (i.e., linked to living conditions, such as birth, maternity, education, housing, old age) and protecting citizens from risks (such as illness, disability, accidents). Social policies pursue the objective of producing welfare for citizens, based on values recognised by a given society, and reflected in rights, norms and standards identified in legislation. Social rights are often associated with obligations to contribute to the costs of policies (Ferrera 2012).

²⁵ The original model of division into welfare regime types is found in Esping-Andersen's best-known work, *The Three Worlds of Welfare Capitalism* (1990). It presented three distinct "ideal-type" welfare regime schemes, the social-democratic, the conservative/continental, and the liberal models. The division was based on an analysis of the interactions and roles of the market, the family, and the state in the provisioning of social care. Based on the different combinations, the schemes were categorised by the qualities of social rights guaranteed to residents, the welfare mix applied, and the degree of decommodification and stratification within the country (Fenger 2007; Aspalter 2011).

²⁶ Schröder (2009) justifies this type of approach using a classification derived from the combination of production system and welfare regime with the use of the following indicators: type of industrial relations (power of unions and employer associations, coverage and strength of collective bargaining); form of the welfare state (wage replacement rates, welfare expenditures); structure of labour markets (participation rates, specialisation of the labour force, rigidity of labour market regulations); income distributions attributes (the Gini coefficient, through a comparison of the richest ten per cent of the population to the poorest); financial system characteristics (protection of investors, importance of the stock market, importance of bank credit). He was able, for instance, through the isolation of four factors of analysis, to show that there is a strong correlation between a strong welfare state, organised industrial relations and fair income distribution. In addition to this, he confirmed that some countries are more similar to others to the point of considering the existence of "families" of nations on the basis of both VoC and welfare state divisions (Schröder 2009: 21-24).

regime models that identify the rights and duties of citizens. The other main difference between these two approaches is that the Esping-Andersen one is not based on functionalism, rather on a perspective rooted in class conflict (Schröder 2009: 20-21). Its classification is more concerned with explaining how the different national (and sectorial) working classes are determinants in shaping their country's welfare system. Quoting Esping-Andersen, the differences in welfare regimes are determined by "*what conditions the class divisions and social inequalities produced under capitalism can be undone by parliamentary democracy*" (Esping-Andersen 1990: 11; Schröder 2009: 20).

Further diversification and categorisation can be achieved by considering different institutional varieties, through the analysis of the economy, educational processes, industrial relations, welfare regimes, skill training regimes and employment systems. This additional partition is particularly relevant in the institutional configurations of the European area, where different countries, regions and sub-regions have been divided into four, defined welfare state categories (Devitt 2011: 585-586).

The first institutional category is the Continental-Conservative regime. Its most famous country representatives are Germany, Belgium, the Netherlands and Austria. In this regime, welfare services are oriented towards passive family policies that give priority to the central social role of the family (and in particular of women), thus meaning modest levels of public social service. The state, however, has the role of guarantor in labour standards and labour market regulation. This model recognises a high general level of education and a strong collaboration (or coordination) between government, industries, employers' associations and trade unions in vocational education and training. Educational and vocational orientation is centred on company- or industry-based training. In turn, the unionisation rate has from a medium to a high rate on average. Its typical welfare state regime is the conservative one, which presents a strong segmentation of welfare programmes on the basis of employment status. One of its main principles is a social security system not conditioned by the notion of employability.

The second category of institutional variety is the Nordic (or Scandinavian) regime. It is probably the regime considered the "most efficient" among all the others, in many different comparisons. In this archetypical configuration, the state has an extremely important coordinating role, equal to the labour-leading role of the unions. In fact, the unionisation rate is typically very high. Social partners are the main monitoring institutions of the overall quality of employment. Countries belonging to this regime are considered to be at the forefront of active labour market

policies (ALMPs),²⁷ in women's participation rate in the labour market, in the adoption of a comprehensive welfare model built on universal citizenship entitlement, on a very high level of average education rate, and on the coordination between vocational education organisations and labour market institutions. This welfare model is also known as a social democratic welfare regime, in which social programmes have a very wide coverage within the population and high homogeneity rates in regards to the level of social benefits. In the labour market area, the production of goods and services are top-notch. The countries that are part of this regime are Sweden, Norway, Finland and Denmark.

The third institutional variety category is the Liberal (or Anglo-Saxon) regime. This category is based on socio-economic strategies directly related to economic competition and free market principles. State and non-state coordination are very low and sluggish. Many social services, especially if compared to the two models described above, are considered weak. The educational system is usually oriented towards general education and continuous post-compulsory formation. The welfare state is also meagre and particularly favourable to private services. The European countries that embody this system are the United Kingdom and Ireland. The welfare state that characterises this typology is known as the liberal welfare regime. It presents the highest level of means-tested welfare programmes and the highest rate of private participation among all other regimes. Its levels of social assistance are low and are generally presented as an individual's last resort.

The fourth institutional variety model is the Southern-Statist (or Mediterranean) regime (Ferrera 1996). Italy, Spain and France are its most important representative countries, albeit each of them has different peculiarities (particularly in the French case). This model was added to the previous three during the nineties, due to harsh criticism directed at the lack of attention to gender dynamics in Esping-Andersen's earlier theoretical welfare state regime division.

The Southern-Statist regime is more similar to a conservative model than the other three regimes. It is most often made up of an industrial fabric built on a large variety of medium and small (often very small and family-based) companies, sometimes grouped into distinct industrial districts. Other features are the large presence of informal labour in manufacturing, agriculture and

²⁷ Active labour market policies (ALMPs) are government programmes that intervene in the labour market to help the unemployed find work (Bonoli 2010). The main goal of active labour market policies is to increase the employment opportunities for job seekers and to improve matching between jobs (vacancies) and workers (i.e. the unemployed) (European Commission 2016). The OECD defines ALMPs as follows: "*Active labour market programmes include all social expenditure (other than education) which is aimed at the improvement of the beneficiaries' prospect of finding gainful employment or to otherwise increase their earnings capacity. This category includes spending on public employment services and administration, labour market training, special programmes for youth when in transition from school to work, labour market programmes to provide or promote employment for unemployed and other persons (excluding young and disabled persons) and special programmes for the disabled.*" (OECD 2001).

care services, the low overall quality of general and specific education, weak coordination levels among vocational education, labour training and the labour market, and a very low level of unionisation. The role of trade unions is limited and the regulatory power and bargaining participation of the governments is quite strong. Unlike the other institutional varieties, the agricultural sector's economic value is generally still very important (Devitt 2011: 586). The welfare regime model of this socio-economic cluster is generally known as the Mediterranean one (or the "familialist" regime), the most recent among all the welfare models. Its distinctive features are a low level of welfare services (although it relies heavily on pensions), the presence of a high segmentation of rights and entry barriers to social services and assistance.²⁸

Apart from the classic categorisation that mainly concerns European countries, there are some "hybrids", such as Japan.²⁹ Japan is apparently a mixture of a liberal-residualist model and a conservative-corporatist model. It features the distinctive pursuit of full employment of the Scandinavian model, a modest public welfare expenditure as in the liberal model,³⁰ the social insurance sectors' division and the dominant presence of the male-breadwinner model peculiar to the conservative model (Tanaka 2019).³¹ Other features of this particular hybrid are an innovation process based on the integration of complex socio-economic arrangements, an intra-corporate financing system focussed on central bank services, employment stability, and the prominent role of public authorities to guide the expectations of private agents. However, these typical Japanese features are in a lengthy transformative process due to the comprehensive economic liberalisation and deregulation, which tend towards a more heterodox economic system (Boyer 2014).

The Japanese welfare regime can be (still) classified as a corporatist, "familialist" type, as the Mediterranean one (Uzuhashi 2003; Estévez-Abe, Naldini 2016; Migliavacca, Naldini 2018a; 2018b).³² Nonetheless, the above described hybrid is changing due to a number of transformative

²⁸ The "familialist" welfare regime is not only represented by Southern European countries, but also by many East Asian countries. These two areas share similar family values, due also to their late political and economic development (industrialisation) compared to the countries belonging to the other regimes (Miyamoto *et al.* 2003). It also developed in those democratic and economic systems that were not mature enough to build an efficient welfare state (Shinkawa 2013: 177) Expectations on families (especially on women) is much higher in these countries, especially for the (limited) public social expenses. One peculiarity of these regimes is the marked importance not only of the family structure in society, but also of firms (generally small and strongly connected to the territory), involved in peculiar organic/family industrial relations (Miyamoto *et al.* 2003: 303).

²⁹ Boyer has built a new category just to be able to identify Japan in the classifications of capitalist diversity, the Asian "meso-corporatist" variety (Boyer 2004). Later in the paragraph for the explanation of this classification.

³⁰ Japan, like the U.S., spends very little on the labour market and family social services, while the majority of spending is directed toward old age (especially Japan due to its rapidly ageing population) and health programmes (especially the U.S. due to its inefficient health insurance system) (Shinkawa 2013: 177-178).

³¹ However, they do not turn out to be equally generous (Shinkawa 2013: 177).

³² Or what Ochiai refers to as Japanese familialist welfare, one of the "varieties of familialism" that have been created in East Asia (Ochiai 2010). She does not see cultural factors in the predominance of familialist welfare in East Asia, but a form of compressed modernity (semi-compressed in Japan), or what Chang (2010: 24) defines as "*Compressed*

factors: the neoliberal pressure of globalisation, the structural demographic transformations (especially population ageing), the alterations of the labour market and its unique system of industrial relations (the progressive decrease of lifelong employment and seniority-based wage contracts), the changes of the traditional role of the family (especially of women, increasingly present in the labour market), and the less socially "shock-absorbing" capacity of firms (through enterprise welfare arrangements, notably in company-specific pension schemes). The traditional Japanese welfare state model based on the male breadwinner model, although still dominant, is slowly changing (Shinkawa 2013: 182-184). This reframing process towards a liberal regime through the retrenchment of the traditional Japanese welfare model, initiated notably by the structural reforms of the 1990s, cannot yet be said to be complete, leaving Japan in a situation that is still ambiguous in the categorisation of its welfare regime and the overall institutional variety model (Shinkawa 2013: 188-189).

In the next section, alternative classification models will be presented, differing from those provided by the VoC approach, so as to have a broader perspective for the cross-national comparative analysis between Italy and Japan.

1.1.5. Other political-economic approaches for the classification of economic varieties

The Varieties of Capitalism approach is not the only one adopted in classifying the different types of capitalism. There are alternative models of economic clusters classification that do not (strictly) follow the VoC approach, such as Amable's taxonomy (2003). It consists of a grouping process based on a quantitative assessment that exploits the main component and five other institutional domains, namely corporate governance and financial sector, product market competition, wage-labour nexus and labour market competition, social protection and welfare state regime, educational system. Unlike the VoC approach, Amable avoids clusters of countries on theoretical grounds. Instead, he utilises statistical analysis with an open outcome to define them. The added value of this analysis is the obtaining of a higher degree of precision in cluster diversification patterns. This

modernity is a social situation in which economic, political, social and/or cultural changes occur in an extremely condensed manner with respect to both time and space, and in which the dynamic coexistence of mutually disparate historical and social elements leads to the construction and reconstruction of a highly complex and fluid social system". In the Japanese case, the (anachronistic) familialist reforms of the 1980s to consolidate the hierarchical and gendered family structures of the 1960s (in an attempt to build a "Japanese-style welfare society"), subsequently resisting the demographic and economic transformations of the 1980s and 1990s, gave rise to the so-called "lost decade(s)". This has resulted in the persistent immobility of the Japanese welfare model (Ochiai 2011).

alternative approach is strongly correlated to quantitative analysis and it uses a large number of statistical indicators (Amable 2003, in Schröder 2009: 24-27).

Boyer's regulation theory (2004) is posed as an alternative to the VoC approach. It consists of a classification theory on the basis of different historical growth trajectories. Boyer's premise is that different countries' growth trajectories created distinct regulation regimes while relying on the assumption that capitalism is seen as an unstable process. The author also uses institutional domains for its classification procedure, i.e. state-economy relations, different forms of competition, wage-labour nexus, monetary regimes, and international trade embeddedness levels. Particular emphasis is placed on socio-political conflicts and endogenous factors of change.

His approach, through the analysis of these institutional domains, led him to create four ideal types: a social democratic regime, a market-based regime, a state-coordinated continental European form of capitalism regime and, lastly, an Asian "meso-corporatist" regime.

In the social-democratic regime, socio-economic actors are the main (socio-)economic agents, mainly negotiating the labour rules; in the market-based regime, economic principles are the major drivers for market and financial behaviour; in the state-coordinated (or statist) regime, public policies are the core of political-economic choices; in the meso-corporatist regime, differently, it is the principle of solidarity that is the gist of political-economic preferences, as it is usually placed in a productive environment dominated by large economic units, whereas it is different in outputs.

These four distinct patterns are the result of how states, struggling with the instability of capitalism and its possible socio-economic repercussions, utilise various other regulatory institutions (Boyer 2004, in Schröder 2009: 25-27).

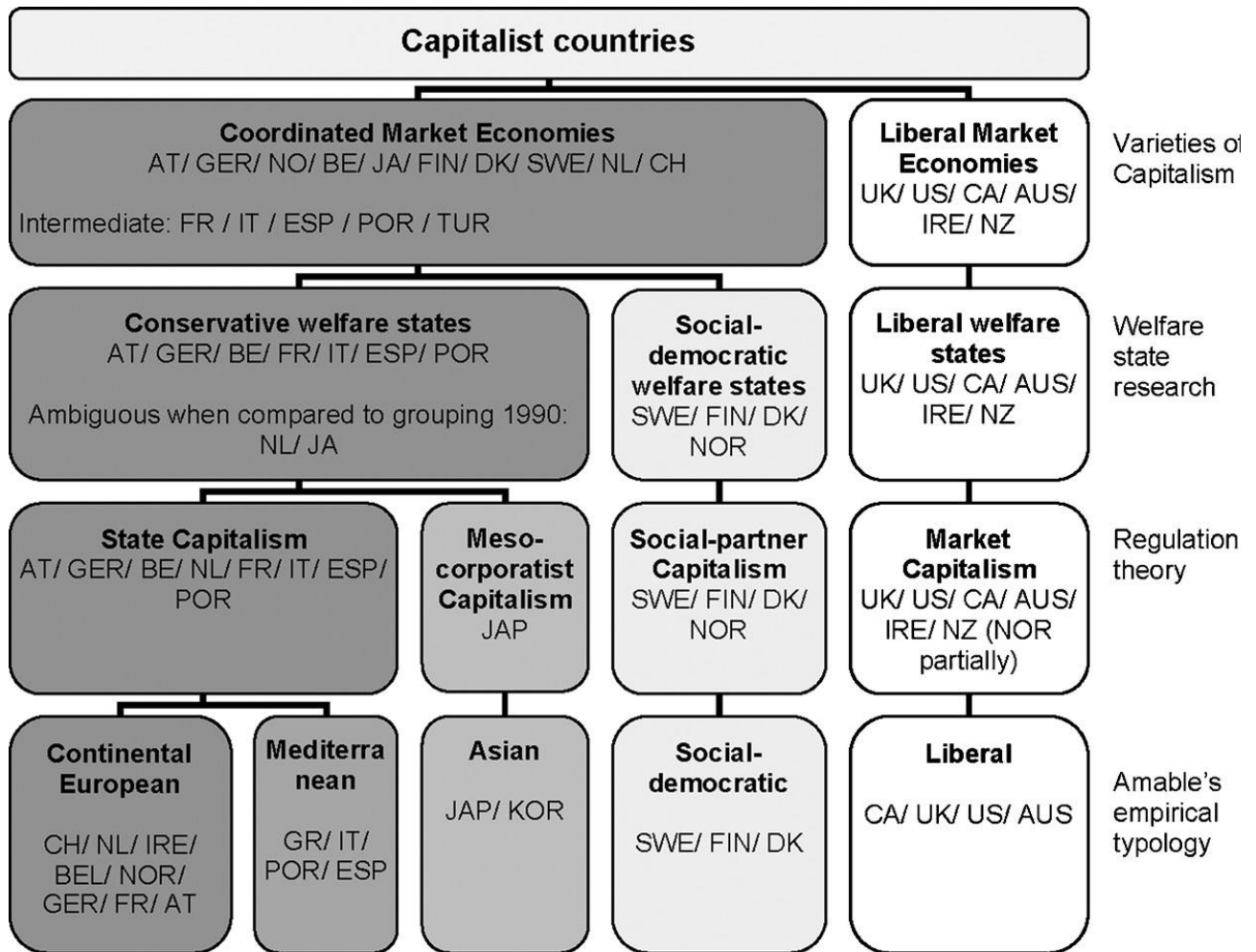


Figure 1.3. Some typologies and their congruence (Esping-Andersen 1999; Hall, Soskice 2001b; Amable 2003; Boyer 2004 in Schröder 2009: 27).

Whitley (1999), contrarily, created a division where he recognised six different varieties of capitalism clusters. He built his theory around the relations between innovation arrangements and firms' qualities within the context of national industrial fabric. These six economy varieties are: the coordinated industrial district, the fragmented one, the collaborative one, the compartmentalised one, the state organised one and the highly-coordinated one.

The coordinated industrial district typology, of which Italy is an example, is characterised by the presence of numerous industrial districts specialised in the production of a particular good (in different production phases). In this variety, the figure of the craftsman is the dominant one, and the economic fabric is mainly made up of small and medium enterprises whose survival is often determined by the ability to associate together and become part of a larger local (or regional) production system. The rate of entrepreneurial failure is relatively high. In Italy, a characteristic of this industrial subdivision is that if, on the one hand, small and medium-sized companies dominate

the Italian production system (with profound consequences in their international economic competitiveness), as well as being predominantly characterised by a family-type structure, on the other, large and medium-sized firms are also family-controlled, but through minority rights. This determines structural difficulties for external control and limited and nuanced transparency. Such a system results in an excess of intra-company dynamics closer to loyalty relationships than to the actual competence of the management (Bianchi *et al.* 2005).

The fragmented type also portrays a productive framework made up mainly of small and medium-sized enterprises, though, unlike the coordinated industrial district which needs individual skills to survive in the market (and with this arrangement create added value in its labour sector), in this type, companies do not try to change production sectors or worker skill sets. This economic behaviour results in the existence of highly opportunistic firms, with low value chain integration and particularly susceptible to market fluctuations.

In the cooperative economy variety (Germany is the most well-known example), the government tends to encourage long-lasting inter-company collaborations, as well as the creation of associations for socio-economic coordination. Workers too, through works councils, play an active role in the firm's decisions, while the most common type of company is the large firm. Large firms are prone to collaborate with similar-sized ones, but also with many other business partners.

The state-organised variety, of which South Korea represents its ideal type, depicts the dominant role of the state that directly (or indirectly) controls large firms. In the case of indirect control, the government oversees firms through subsidised credit by state-owned banks, or through interpersonal relationships between politicians and company executives.

The compartmentalised typology is similar to the state-organised one, though without the weight and tight control of the government. This variety, too, is dominated by a productive system consisting mainly of large companies and by an extensive level of bureaucratisation.

The last variety, the highly-coordinated one, represents the highest form of socio-economic collaboration, even more than the collaborative type. The most significant example in this sense is Japan. In fact, through the central government, which has an even stronger and more direct role in the coordination processes, companies, gathered mostly into a highly-hierarchical system, collaborate by forming solid socio-economic alliances. Enterprises integrate inter-firm and inter-industry activities due to a greater internal labour fluidity. The same process is applied among workplaces, in particular inside the same corporate family of firms.

Regardless of the approach used, classification results tend to be rather similar, close to the considerations (and categorisations) produced by Esping-Andersen's welfare state regimes.

According to Schröder (2009), these numerous similarities (and slight differences) discovered by the different classification approaches are metaphorically reminiscent of the Russian "matryoshka dolls" (Schröder 2009: 26).

This theoretical division also affects causal determinants that are not immediately clear or particularly deepened by comparative studies literature, such as the role of different socio-economic regimes in shaping international labour migration processes or the determinants for the presence of specific categories of migrant workers (labour demand-side) in a national labour market (Devitt 2011). Comparative political economy has long studied how institutional factors determined by different institutional configurations of socio-economic organisations regulate both employment levels and the demand for migrant workers (Gallie 2007; Fellini, Fullin 2018: 296-297). For example, the Mediterranean regime, known for its low level of innovation, has led to strong demand for low-skilled and low-cost migrant workers in response to its structural and production needs.

In the final section on the theoretical identification of the varieties of capitalism, the welfare production regimes and their central role in countries' clusters classification will be introduced.

1.2. Welfare Production Regimes and different strategies for market economies

Summing up, a final determining feature for the definition and classification of clusters of countries in relation to market dynamics is the interaction between the welfare state model (and types of social protection) and skill formation processes. This interaction must take place within each socio-economic framework and national labour market, in order to manifest its peculiarities (Estévez-Abe *et al.* 2001). In other words, this combination, and the national institutional model, generate a competitive economic advantage in the international market. In addition to them, the specific socio-political choices aimed at social protection services should be evaluated, as well as the models of the economic and educational systems that privilege particular skill training options. As in the VoC approach, in this case, too, it is important to consider the correlation among other factors, such as the type of production and innovation arrangements, the educational system, the presence of low-cost workers (potentially migrants), the level of cross-class alliances between labour and capital, the degree of unionisation and the quality of industrial relations.

Estévez-Abe *et al.* (2001) have coined the expression "welfare production regime" to identify those institutions correlations while analysing the strategies of market production, employees' skill trajectories and the model of socio-political-economic institutions that support

them. Their analysis focussed on exploring how different kinds of product market strategies are suitable for workers with precise sets of professional characteristics, such as skill profiles identified in general, industry or firm-based skills. Conversely, different kinds of welfare state regimes influence investment choices in certain skill sets (Estévez-Abe *et al.* 2001: 146).

With regard to these three skill set profiles, systems with an abundance of general skills are identified as a type of generalist training profiles. General skills are widely used for generic production and do not require robust technical specificity, allowing for a high rate of portability of the worker's skill set. The high marketable value of labour skills is directly related to the vocational training arrangements, propaedeutic to this process. However, this makes the worker lose part of their marketability, economic power and self-valorisation, as generalist skills are easily found everywhere in the market and are held by a large portion of the working population (an example of this kind of skill environment is the Italian case). Industry-based skills still have a high degree of portability and are determined by a vocational training structure that is designed according to the needs of specific labour market sectors. The valorisation of these skill sets is the result of a vocational training system (state or private) that is well-embedded in national, regional or local production processes. Frequently, vocational training also takes place through apprenticeships and traineeships and allows workers to obtain certificates that attest to the retention of these skills. Firm-specific skills, typical of the traditional Japanese training system, are designed for a workforce that can remain stable within a single company (or within the company's corporate family). The employee is usually encouraged to be technically trained directly within the company itself. Generally, intra-company training grants the possibility to learn a large number of task competencies and a wide range of skills, though, at the same time, it conceals an absolute low degree of portability across the labour market.

In both company-specific and industry-specific skill-training systems, employers push to bear a high degree of direct participation in the vocational training programmes of future workers. In order to be effective, vocational training programmes have to be executed during the period of compulsory education. In these systems, employers are interested in ensuring the overall quality of vocational training to achieve an adequate and rapid transition from school to work (which is generally highly institutionalised). The more competitive the educational system is, the greater are the benefits to employers.

In a very simple division, labour markets with a large pool of workers with generalist skill sets will be more likely to have a comparative advantage in radical product innovation; while labour markets with an abundance of workers with company- and industry-specific skills will be extremely

prone to enhancing incremental innovation production systems. However, it is difficult to maintain this kind of definite, precise dichotomy, as in any labour market many types of skill sets are likely to coexist and different strategic and productive hybrids are present.³³ For instance, Japanese car production has traditionally used a system similar to the mass production of the American Fordist manufacturing industry, even though it has expanded this concept with diversifying processes of the working skills of Japanese labour. This type of production regime is alternatively known as "diversified mass production" (DMP) (Estévez-Abe *et al.* 2001: 148).

Since a certain type of production system promotes the presence of a specific type of workforce, and subsequent investment in individual training, workers must assess what is best for their future career (or for their survival in the labour market). There is always a certain degree of risk factors between personal investments and the fluctuations of labour markets. Workers have to evaluate costs, risks and possible benefits at all stages: in a system with high labour market volatility, such as in the USA, it is probably better to invest in general skills that can be used from time to time in different companies or industries; differently, in a system of wage growth based on employment continuity and seniority wage upgrade, such as the Japanese one, it seems to be much more convenient to invest in very specific skills. The risk, therefore, is mitigated by the forms of social protection that the national institutional structure (welfare state) puts in place for the workers to decide which kind of skill investments are most useful in the labour market.

Estévez-Abe *et al.* distinguish three types of social protections, specifically wage protection, employment protection and unemployment protection. The first form of protection tries to safeguard employees through institutional mechanisms which, despite not being directly part of the welfare system, attempt to control sectorial wage levels from market fluctuations. Wage protection is divided into protection for the unemployed and protection for the employed. In the case of unemployment, wage protection is identified as guarantees of maintaining wage levels upon returning to work (for example after a period of unemployment). In the case of employment protection, wage protection simply consists of ensuring that the wage level does not fall over time. Employment and unemployment protections pursue, respectively, maintaining employment guarantees (e.g. from the risk of dismissal) and maintaining wage level guarantees during unemployment phases. Although they may seem similar, they portray two opposite sides of social policy thinking about very different employment dynamics issues (Estévez-Abe *et al.* 2001: 150-155). Welfare production regimes like the Japanese one, in which workers should be tied to a single (large) firm, require a type of employment protection that guarantees permanence in the labour

³³ Germany is a classic example of a country that requires a mixture of industry-specific and company-specific skills for its workforce.

market and avoids dismissal (forms of employment protection), while in a highly fluid market system, low marketable skill bargaining power requires a totally different set of employment protection policies for times of absence of/from work (forms of unemployment protection).

Institutional assets based on employment protection are better suited to firm- and industry-specific skill bearers, while institutional regimes that adopt mostly unemployment protection guarantees have greater affinities with a workforce that possesses general skills. Systems with a predominance of firm-specific skills, in turn, require more assurance of protection than systems with more industry-specific skill bearers, since any high-skill professional worker movement within the labour market appears to be more difficult. Industry-specific skill sets offer some degree of portability within, at least, one industry (Estévez-Abe *et al.* 2001: 149-155).

Countries with a high rate of workers with firm-specific and industry-specific skills are more dependent on wage-bargaining systems than market behaviour, where general skills are dominant. Examples such as Japan and Germany, where workers and employers invest more in firm-specific skills and/or industry-specific skills, trade unions and works councils play a key role in protecting core regular workers, by also managing negotiations to maintain wage levels and to provide subsidies during periods of economic downturn. Trade unions and employers are generally bonded by a collaborative and sympathetic relationship with respect to market needs. In systems with a prevalence of general skills bearers, such labour-capital collaborations are unlikely and they would probably result in unwanted effects like widespread disincentive in skills investment. This happens in archetypical liberal countries like the USA and the United Kingdom, where employment and unemployment protection policies and benefits are scarce (Estévez-Abe *et al.* 2001: 160-162).

The cost-benefit analysis is part of the economic logic that workers, aware of these specific protection systems, *a priori* evaluate the quality and quantity of skills to invest in (when it is possible). At a lower level of employment protection, investment in general skills is a worthwhile choice. Though an institutional framework that offers greater employment protection and a labour market that requires the portrayal of general skills could become an overall negative competitive value, as there is a high risk of production and technological improvement stagnation (Estévez-Abe *et al.* 2001: 162-169).

The model built by Estévez-Abe *et al.* is based on the protection of workers by the combinations of different institutional frameworks and incentives to invest in certain skill patterns, and it can be summarised as follows: when there is a high level of unemployment protection and a low level of employment protection, as in the case of Denmark and its "flexicurity" model, the pattern is of incentives in the investment of industry-specific skills. This choice is encouraged also

by the fact that this particular socio-economic configuration occurs notably when the national industrial fabric is dominated by small firms, a low level of efficiency to adapt to business cycles and a small internal labour market. Consequently, employers are not conducive to expensive forms of employment protection; a low level of institutional protection for both employment and unemployment conditions determines investment in general skills, while firms tend instead to invest in technologies that require less skilled workers. It is highly probable that the educational and vocational systems are weak and the workers are discouraged from seeking autonomously a type of professional training different from the compulsory, general one; a high level of protection for both employment and unemployment conditions determines a favourable system for the investment of firm-specific and industry-specific skills, resulting in a lower labour market need for general skills. To achieve this situation, an efficiently organised cooperative framework and a high unionisation rate are required; the last combination is made of a high level of protection of employment and a low level of protection of unemployment, of which Japan is the archetype. In this case, investments focus almost entirely on firm-specific skills, due to professional paths traditionally centred on careers within the same company. Individual vocational training is entirely intended to be carried out within the same workplace. Though given that this system would require a huge resources investment by companies, in particular in the event of an economic recession, this institutional framework prefers the protection of workers in regular employed status, and it tries to avoid dealing as much as possible with unemployed conditions. This is particularly true in the Japanese case, as its industrial fabric is presently dominated by small and medium-sized enterprises, more subject to the difficulties related to economic fluctuations.

To sum up, the combination of employment and unemployment protection arrangements determine different labour skill profiles. The higher the employment protection level, the greater are the investment incentives in firm-specific skills. The higher the unemployment protection level, the greater the investment is in industry-specific skills. Their absence, on the other hand, encourages investments in portable, general skills (Estévez-Abe *et al.* 2001: 180-183).

		Employment protection	
		Low	High
Unemployment protection	High	Industry-specific skills Example: Denmark	Industry-specific, firm-specific skill mix Example: Germany
	Low	General skills Example: United States	Firm-specific skills Example: Japan

Figure 1.4. Social protection and predicted skills profiles (Estévez-Abe *et al.* 2001: 154).

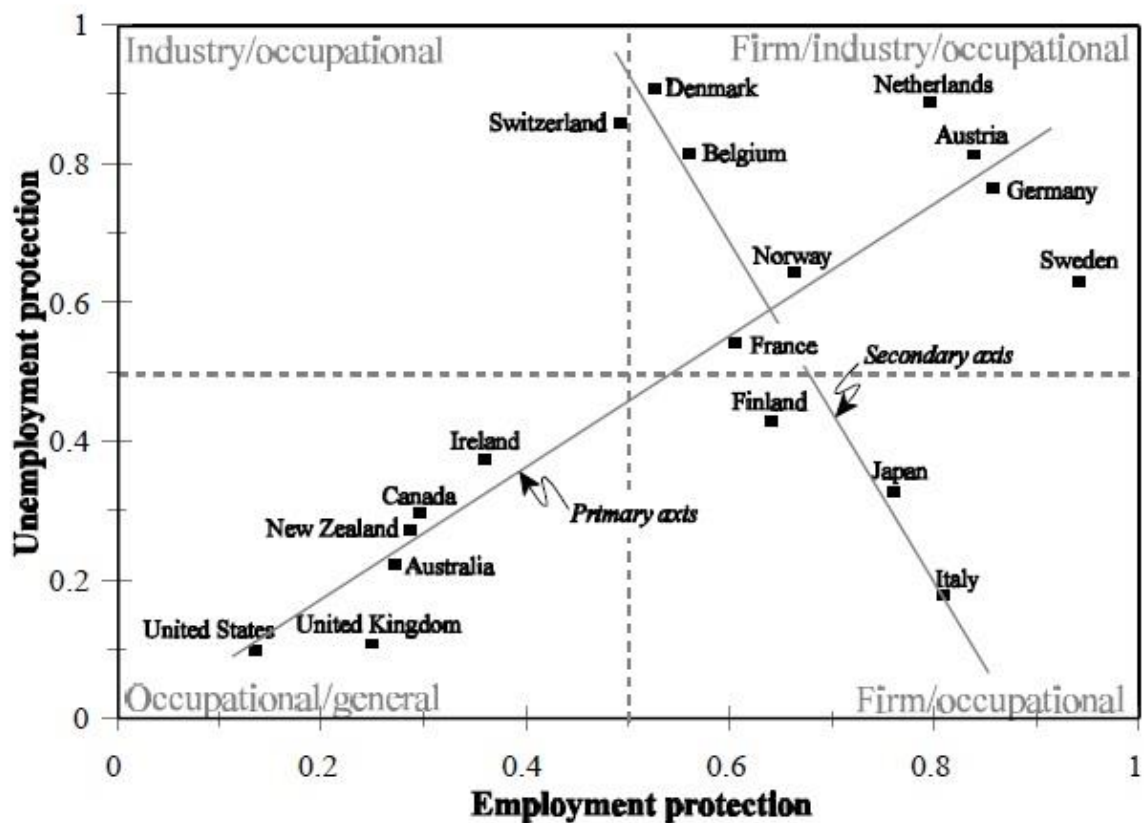


Figure 1.5. Social protection and skill profiles (Estévez-Abe *et al.* 2001: 173).

1.3. Italy and Japan in the Varieties of Capitalism approach: a preliminary comparative analysis

Italy and Japan have been extensively described in VoC theory. Both countries are located in a distinct typology of market economy, although the placement has not been rigid and has undergone some modifications over time. This, for example, has been the case in Italy. Below is a brief summary of the characteristics of Italy and Japan within the VoC approach.

The first of the two countries to be analysed is Italy. The Italian peninsula is classified as a market economy beyond the classic division between CMEs and LMEs, namely as a mixed market economy (MME), also known as Mediterranean market economy (Amable 2003; Hall, Gingerich 2009).³⁴ MMEs typically present low levels of social protection while they maintain high labour protection rates. These socio-political arrangements, in turn, decrease the market's need to invest in advanced industrial technologies. Other peculiar features of this system are the overall low competition caused by the high regulation of market production, the limitation of financial power due to strong state-protected bank-industry relations and, in the collective-bargaining area, the (still) dominant role of the government.³⁵ Lastly, central governments are in support of non-market coordination arrangements that, along with all of the above features, place MME variation exactly halfway between CMEs and LMEs. In such an environment, trade unions and employers' associations are unable to create an autonomous coordination space (Molina, Rhodes 2006: 11).³⁶ At the same time, the degree of institutional complementarities is low compared to a CME.³⁷

³⁴ It may be seen as a CME sub-variety type too (Wright 2012).

³⁵ More generally, and this also relates to Japan, the role of the state is a major coordinating device because the decisions of governments depend on regulatory framework designs (Amable 2003). However, in recent years this assumption has been questioned several times in political-economy literature and the role of the state replaced by that of the market (Storz *et al.* 2013).

³⁶ This is also based on the coordinating power of government and the organisational strength of the other stakeholders.

³⁷ Other distinctive features are the relative importance of agriculture, the economic fabric which is made up, for the most part, of SMEs, the presence of a large informal economy and a tradition of state-managed vocational education and training (VET), which is generally considered to be inadequate for the specific skills requirements of the labour market.

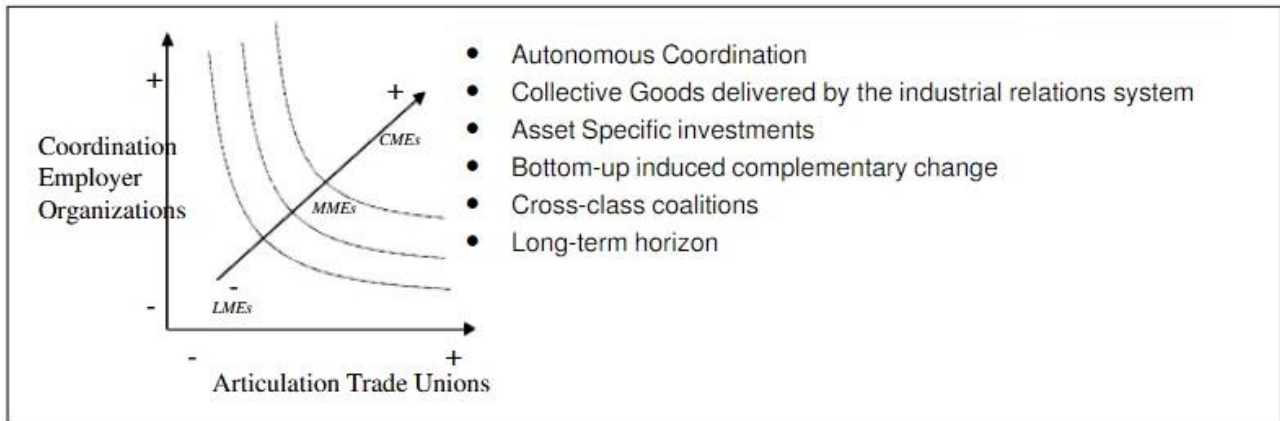


Figure 1.6. The organisational logic of complementarities in VoC (Molina, Rhodes 2006: 12).

The Italian case, together with countries such as South Korea, Spain and France, has been re-framed into MMEs, detaching from the first classic dichotomous division between CMEs and LMEs. The initial division made by Hall and Soskice was subject to criticism from many VoC scholars due to the apparent underestimation of the role given to the state within the coordination processes (Martin 2005; Pontusson 2005). As a result of these criticisms, the new mixed market economy category was introduced (Hanckè *et al.* 2007; Watanabe 2015b).

The problems that induced the reframing of the original dichotomous categorisation were: excessive interest in the role of firms at the expense, especially in the macro analysis area, of the power and role of politics; numerous difficulties in managing the various institutional misfits and their contradictions; too many concerns about possible institutional equilibrium and resilience. All these assumptions are meant to facilitate the analysis and classification of market economic systems, like countries with different performance-enhancing institutions and with well-established patterns of interaction and coordination among socio-economic actors. At the same time, this new approach to VoC studies helped to overcome the previous difficulties in the analysis of potential anomalous and deviant cases, which lacked reinforcing institutional complementarity patterns. These "unusual" cases belong to those market economies defined as "mid-spectrum" economies (Molina, Rhodes 2006: 11).

	CMEs	LMEs	MMEs
<i>Dominant form of coordination of micro-interactions</i>	Autonomous coordination	Market; arms-length interactions	Mixed (autonomous + market) with a higher impact of regulation and state mediation
<i>Source of complementarities</i>	Bottom-up induced	Market-induced coherence across policy arenas	State regulatory change aimed to correct coordination failures
<i>Re-enforcing mechanisms (mechanisms of stability)</i>	High permeability of political system to domestic coalitions	High penetration of policy-making by exogenous economic forces	Gate-keeping role of the state; veto power of domestic actors
<i>Time horizons</i>	Long-term	Short-term Employers: strong and well-organized in sectors	State regulation may perpetuate long-term inefficient equilibria
<i>Investment in specific assets</i>	High	Low	Medium-low
<i>Organizational characteristics of interest associations</i>	Employers: strong and well-organized in sectors Unions: politically strong and well-articulated organizations	Employers: fragmented Unions: strong firm-level, but fragmented and politically weak	Employers: fragmented Unions: politically strong but fragmented and weakly articulated
<i>Role of the state</i>	Enabling; protects collective goods	Minimum state: guarantees the effective functioning of the market	Pervasive state: direct production and regulation + correction of coordination failures
<i>Expected reform coalitions</i>	Cross-class	Producer groups, multinational industrial and financial groups	Class-conflict; fragmented cross-class coalitions (sectoral reform coalitions)

Figure 1.7. CMEs, LMEs, MMEs in Varieties of Capitalism (Molina, Rhodes 2006: 12).

This is the case of Italy, a country that fully falls into the MME category. If considered within the regional context to which it belongs, the Eurozone, Italy has been the slowest country in terms of economic growth since the beginning of the millennium. The preponderance of manufacturing companies has determined much of this sluggishness, as they are in an unfavourable position in global competition with respect to (the more competitive) emerging countries. Its residual and anachronistic production processes and corporate governance systems are an additional cause of lagging behind the other OECD countries.³⁸ Italy's almost atavistically low productivity level is, in turn, related to deficits in R&D (research and development) investments and low levels

³⁸ Chiesi (2013) summarises the imbalances of the Italian economy with: the huge disparity in the proportion of small companies compared to a limited number of large corporations, mostly concentrated in the domestic market; an insufficient number of medium-sized companies, unable, together with small and family-run ones to compete in the global market; a presence of companies poorly distributed in different production areas and economic roles (in particular a huge difference on a regional and local basis within the country, especially between northern and southern regions); a clear disproportion of efficiency between the public and private sectors, where the former results in a large productivity deficit (Chiesi 2013: 61-62).

of productive and technological innovation. The Italian competitive advantages, especially in times of high competition or economic crisis (as in the case of the global crisis of 2008), focus on high quality manufacturing sectors, such as luxury, fashion, jewellery, etc. At the same time, it is known for being weak in controlling production costs in all the remaining industrial sectors (in comparison to international competition) (Chiesi 2013: 61-62).

As far as production systems are concerned, Italy and Japan are quite different: the Italian production system appears to be dominated by a heterogeneous type of production, while the Japanese one is mainly export-oriented, especially in the field of products related to the automotive and electronics industries. Italy's production specificities have made it considered a variety of capitalism of "*small businesses and widespread entrepreneurship [...], [in which] the self-employed represent the majority of businesses*" (Chiesi 2013: 62).³⁹

The other country under analysis in this thesis is Japan. Japan is a typical CME country, that is based on non-market coordination mechanisms such as friendly industrial relations and organised labour market regulations (Thelen, Kume 1999a; 1999b; 2006). Japanese systemic coordination between labour, business, and the state is considered one of the distinctive features of Japanese-style capitalism, a peculiar political-economic configuration that has determined Japan's economic efficiency and considerable dynamism among highly advanced countries (Gilpin 2001: 156-168). Economic efficiency and social harmony are distinctive features in classic CME countries (Hall, Soskice 2001a), that are, in turn, well identified with the inherent "Japaneseness" of the archipelago's political-economic system. Japan can be also seen as a CME sub-variety, with more vertically integrated markets (Wright 2012).

Other common features of this type of regime are the greater presence of firm- and industrial-specific skill bearers in the labour market, institutional complementarities, such as industrial policies and long-term corporate strategies, that encourages incremental innovation arrangements, and a state-corporate system interested in safeguarding stakeholders' interests. In addition to these features, CMEs contain a high degree of indirect financing, extensive use of state capital for future investments and solid employment protection policies (Hall, Soskice 2001a; Amable 2003; Watanabe 2015b). However, according to Witt and Jackson's analysis (2016), the idea of Japan as a CME is widely criticised because, despite its several unique features, it has

³⁹ SMEs are the majority of businesses in all OECD countries. This value is even higher in Italy, representing the backbone of the entire national production system. They generate 66.9% of overall value added in the national "non-financial business economy", exceeding the EU average of 56.4%. The share of employment generated by SMEs is also greater, at 78.1%, compared to the EU average of 66.6%. Micro firms are particularly important, providing 44.9% of employment compared to the EU average of 29.7% (European Commission, SBA Fact Sheet Italy 2019). Furthermore, together with Greece, Italy has the smallest average firm size among European countries (Eurostat 2018).

characteristics closer to LME countries. Although without really being part of the LME cluster of countries, it partly resembles them. This criticism is, in turn, challenged as Japan continues to present, albeit to a lesser extent, socio-economic principles of stable employment typical of the Japanese-style manufacturing industry, the "micro-corporatist" arrangements for the protection of core regular workers and a low rate of labour turnover. Nevertheless, new characteristics, such as greater deregulation and liberalisation of the labour market, are typical of liberal institutions. Japan's compulsory educational system, too, is characterised by a generalist type of skill formation and vocational training processes, while shareholder's rights and labour's decisional participation within firms are typical of liberal corporate ownership systems (Witt, Jackson 2016: 794).

An important peculiarity of Japan's market economy, together with that of South Korea, is the fact that compared to other CMEs they are mainly designed as group-based coordination economies. Unlike the more traditional CME, industry-based coordinated economies (such as Germany), these two systems have evolved with the concept of corporate community at the centre, as if the firm was an extended part of the family. The difference is that, dissimilar to classic CMEs where the relations between trade unions and employers' associations create the market coordination environment while influencing the choices of corporate collaboration (industry-specific) by regulating wage systems, negotiating employment guidelines and shaping vocational training schemes (industry-specific skills), Japan and South Korea present a vertical business system. This top-down corporate configuration is usually made up of a series of company social interconnections built of different families of firms. Each of them can be found across many industrial sectors, whereas only one company of the business "family" is at the top of the hierarchical pyramid.⁴⁰

This business "family" configuration is called *keiretsu*,⁴¹ while this kind of business coordination is also known as *keiretsu*-led coordination (Hall, Soskice 2001a: 34-35).⁴² One

⁴⁰ The definition that Dore (2013b) gives of corporate governance, in particular, with reference to the Japanese model, turns out to be broader than the traditional one related to the simple relationship between owner principals and manager agents. Instead, it refers to companies that have passed through the stage of family enterprises or partnerships. The definition is as follows: "*that set of institutions (ranging from generally enforced legal prescriptions to social norms and conventions) that determine the distribution, among the various people (hereafter 'stakeholders') who have dealings with, or work in, a corporation, of the power (a) to determine what the corporation as a legal entity or its stakeholders individually actually do and who among the stakeholders profits to what degree from the value added by its activities.*" (Dore 2013b: 26)

⁴¹ In Japanese 系列, literally "group of companies/enterprises". They are also known as industrial or vertical *keiretsu*.

⁴² In South Korea the equivalent of the *keiretsu* are the *chaebols*, even if they do not fully replicate their Japanese counterparts. The term *chaebol* is the transliteration of the Japanese term *zaibatsu*, and like the latter especially in reference to their pre-war model, most of them are generally owned and controlled by one person or one family, which in turn is organised into a centralised participatory society. The major difference with Japanese groups, especially those operating in more sectors than *keiretsu*, is that *chaebols* have more often started their activities in a few related

particularity of the *keiretsu*-style corporation model is that these groups can be composed of a network of vertically integrated independent companies belonging even to a single industry. In this case, it consists of suppliers, manufacturers and distributors, comprised mainly of a large successful parent company and several vertically aligned subordinate companies, divided into different tiers.⁴³ This top-down alignment is characterised by several hierarchical relationships between companies. For example, hierarchy is manifested in the productive order and the status of the individual firm. In the lower tiers of the hierarchy, profit margins are reduced while risks of economic disruption are higher, but, at the same time, these firms hold fewer responsibilities towards the entire *keiretsu* group.⁴⁴ The word "independent" does not refer to the strict sense of the term, as also *keiretsu* families maintain and nurture formal relationships with other industrial groups. Through the shareholding of various financial institutions, two or more *keiretsu* can effectively create "supergroups", that are able to operate in several economic markets (Orrù *et al.* 1991).

In the Japanese business system, *keiretsu*-style corporate families represent the major national independent industrial and financial groups, though there are also the equally important *kigyō shūdan* groups,⁴⁵ a business configuration that operates in several markets and is characterised by a more horizontal corporate structure.⁴⁶ *Keiretsu* and *kigyō shūdan* are the two most important business configurations of Japanese industrial groups, as both are on the top of the national economic system.

Another interesting peculiarity of the *keiretsu* system concerns the skill training processes and technology transfers (Hall, Soskice 2001a: 34-35). In Japan, these processes are internal to the firm, due to a strong investment in firm- and/or group-specific skill sets that can be exploited not

industrial sectors, involving a narrower range of industrial and commercial activities, with a more irregular distribution of resources between the different sectors.

⁴³ Among the most famous and representative *keiretsu* are the Nissan, Toyota and Toshiba groups. Nissan, for example, maintains long-term relationships with certain subcontracting parties, many of which are adjacent or close to its production facilities, so that members of the independent groups form a geographical, as well as an economic and social community (Orrù, Biggart, Hamilton 1991).

⁴⁴ It is also true that these clusters of companies take the various social and hierarchical relationships seriously, and their internal organisation guarantees a mutual benefit for all parties involved. In fact, each company, even the smallest manufacturer in the lowest tier, considers itself directly as members of a community of companies with a distinct identity, knowing their exact position within the community and what economic role they are given (Orrù *et al.* 1991).

⁴⁵ In Japanese 企業集団, literally "horizontally diversified business groups".

⁴⁶ Actually, *kigyō shūdan* too are *keiretsu*, but in a different form. Their particularity, in addition to their horizontal structure, is that of having a bank as a centre for cross-shareholding relationships with the other companies that make up the group. Among the most famous are the Japanese "Big Six", namely Mitsubishi, Mitsui, Sumitomo, Sanwa, Fuyo and Dai-Ichi Kangyō. In the particular type of Japanese-style capitalism, Japanese firms are more dependent on the "patient capital" of their intra-corporate bank than on market capital. This banking system, as a result, is more dependent on low-interest rate deposits and central regulation by the Ministry of Finance (MOF) (as well as a series of unwritten rules and behaviours typical of Japanese inter- and intra-firm relations). This system is known as the Japanese "convoy system" (Suzuki M. 2013: 86).

only within the company but also throughout the whole *keiretsu* family to which it belongs. As a result, thanks to strong investments in skills relating to a specific firm (or its family group), *keiretsu* groups usually invest in lifetime labour. In addition, participation of the individual worker within the firm is relatively high, as a shareholder or in enrolment rate in the typical Japanese intra-firm union, the enterprise union (although this is true almost solely for large companies) (Gordon 1998).

A further characteristic of the Japanese industrial system is the general low predisposition to radical innovation arrangements, differently from the typical LME innovation systems, like the North-American one, that exploits its comparative institutional advantage through radical innovation arrangements. However, it is also different from CME systems like the German one: even if, like CME institutional variations, Japan relies on incremental innovation as a comparative institutional advantage, it remains dependent on sector-centred technology transfers. These are the reasons why the Japanese market economy system differs from the two original market economy archetypes, despite being closer to the parameters of CMEs. Other features of the Japanese-style market economy are that the production system is stimulated by the possibility of rapid organisational redeployment given by the particular worker's skill training and because of the ability to take advantage of cross-sector technology transfers due to *keiretsu*-style business corporations.⁴⁷ As a group-based system whose institutional comparative advantage is found in the large-scale production of consumer goods, innovative and flexible use of existing technology and the possibility of rapid and effective organisational change (such as with the *just-in-time* system), the Japanese-style market coordinate economy tries to compete with the global economic market while maintaining the typical principles of Japanese industrial relations. To sum up, the particular Japanese style of coordination, whose institutional structure supports the interactions among large groups of business "families", encourages firms to use specific corporate strategies thus creating their own comparative institutional advantage (Hall, Soskice 2001a: 34-35).

In contrast to what is theoretically envisioned in the VoC approach with regard to CME countries, Japanese business, particularly large global corporations, is pushing for increased deregulatory and (neo)liberalising processes in the labour market and the domestic economy (Ido 2013: 138-139). Not only do these pro-market transformations run counter to classical CME theory, but also to the peculiar Japanese model of industrial relations that will be described shortly.

1.3.1. Japanese-type capitalism paradox and contemporary transformations: a brief review

⁴⁷ Even if the *keiretsu* of the 1960-1990 type has been modified (weakened) in the last 20 years.

The Japanese market economy's classification in the CME category has turned out to be labile. Several socio-economic transformations have involved the archipelago, initiating a series of transformative processes that affect its economic, social and political spheres.

Paradoxically, Japan has had, differently from the typical VoC perspective, the highest number of deregulation processes and the highest rate in the labour market's flexibility policies among OECD countries. The well-known (and envied)⁴⁸ Japanese industrial relations' system, characterised by the so-called *three sacred treasures*, namely lifetime (or long-term) employment,⁴⁹ a wage system based on the length of service (seniority wage system or *nenkō*)⁵⁰ and an enterprise-based unions system,⁵¹ seems to have faltered allowing not only strong deregulations of the labour market and an overall worsening condition regarding non-regular workers but also affecting negatively core regular workers. Core regular workers with open-ended contracts were commonly the dominant type of workers in the Japanese labour market, especially in large companies, and the most protected by the labour system and employment policies (Nakamura 1993).

The paradox regarding the Japanese position in the VoC categorisation is also confirmed by Lechevalier's statement regarding "*Japan's achievement of a neo-liberal transition from 2006 to 2016*", due to the increased numbers of non-regular workers and the increased liberalisation processes (including financial ones). To these changes must be added political-economic measures

⁴⁸ At least until the early nineties when there was the burst of the so-called Japanese "bubble economy".

⁴⁹ Lifetime employment, the fundamental cornerstone of Japanese industrial relations practices, is characterised by three fundamental features: the general investment in employee's human capital is much higher than in Europe and especially North America, as a long-term employment relationship between employees and firms persists longer. As a consequence, more investments are made in on-the-job training and formal job-related training processes within firms; the longer average duration of employment relationships allows the development of multi-task skills through an almost constant process of job rotation. This peculiarity has activated an extremely flexible work system and is often suitable for "just-in-time" demand situations, consequently reducing job classifications within Japanese companies; the perception, real or fictitious, of the risk of job loss due to the introduction of new productivity-enhancing technologies is relatively low (Nakamura 1993).

⁵⁰ The length of service wage system rewards, known as *nenkō joretsu* (年功序列), is characterised by the fact that workers are assessed on the basis of their career path and consequently their entire professional career. Such a system implies an explicit incentive for the worker to remain within the same company. This system is regarded in Japan as extremely fair and with little chance of misjudging intra-company dynamics such as staff rotations and promotions, as it ensures that workers are assessed by numerous supervisors throughout the employee's long work cycle (Nakamura 1993).

⁵¹ Japan's unique enterprise union system involves three well-defined causal characteristics: as a consequence of the long working relationship between the employee and the company, the trade union within the company appears to have the power to ask for a fair share of firm profit; since the position within the trade union within the company is also part of the long process of training the worker, which can lead more easily to managerial positions, companies are more inclined to share information with the trade union itself; thanks to the trust generally established between the company and the enterprise union, demonstrated by the sharing of information related to company performance and the same common production objectives, the management, the union and the workers are more likely to accept rollbacks of bonus payments in difficult economic times for the company, with limited impact (or not affecting at all) overall product quality and production efficiency (Nakamura 1993).

such as the globalisation of corporate management and the deregulation of compulsory education (Lechevalier 2014).

Taking a step back, Japan, in addition to being included among the family of CME countries, has also been classified in a different, unique category. This category is the so-called Japanese-type capitalism introduced by Albert in 1991, known also as the *nihon-gata shihonshugi*.⁵² Even in this case, the distinguishing characteristics of the Japanese model are still in contrast with LME institutional configuration, in particular its lower level of marketisation, the greater importance of relational⁵³ transactions (as opposed to direct contractual market transactions), and the predisposition to long-term commitments (as opposed to the brevity and volatility typical of liberal capitalist systems). Albert again described the characteristics of Japanese capitalism by identifying them through the *three sacred treasures* of Japanese industrial relations, namely lifetime (or long-term) employment (with specific labour market socio-economic arrangements to support it), seniority wage system (bureaucratic pay and promotion system), and enterprise unions system (that includes a procedure of a regular annual bargaining round for pay-adjustment). To these features, he added the cross-cutting importance of insider management and a share ownership structure heavily involved with intra- and inter-corporate cross-holdings (Albert 1991; Gordon 1998).

Historically, the Japanese model of capitalism, as part of a commonly shared post-war economic model, was based on the concept of embedded liberalism (Ruggie 1982), a notion based on pre-war laissez-faire experiences mixed with theories of Keynesianism and multilateralism (Suzuki M. 2013: 87). Japan's peculiar system of that time, for its political regime known as the

⁵² In Japanese 日本型資本主義, literally "Japanese variety of capitalism".

⁵³ The term "relational" is, according to Dore (2013b), the core of the economic system that characterises the Japanese variety of capitalism and corporate governance structure. It is applied at multiple levels of the Japanese system, from within the corporation with the presence of "relational employment" and "relational shareholding," to its periphery with the presence of a system of "relational banking" (as opposed to the more common market banking system). Crucial also are the dynamics of "relational trade", i.e. long-term patterns of inter-firm cooperation that occur to address shocks and transformations in market conditions (relationships, at various levels, between firms, banks, suppliers and client firms; this allows providing benefits for all partners, and in the long run a fair distribution of rewards). Over a broader economic range, it is possible to consider a "relational competition" that indicates a balance between cooperation and competition between competitors in the same area or production sector. A final area is that of "relational regulation", which has the Japanese government as the main implementer aimed at achieving egalitarian distribution through the implementation of regulatory policies to protect, for example, small and medium-sized enterprises against the market and neoliberal processes (conflict resolution, different degrees of negotiation between labour and capital, *ad hoc* subsidies, etc.) (Dore 2013b: 32-34). This model has also been referred to as "crony capitalism," yet different than the Chinese (*guanshi*) or Indonesian Suharto-type models of trust relations. Unlike the latter two types based on ascribed characteristics of family ties, the Japanese model is based on performance evaluation and outcomes (Dore 2013b: 33).

"1955 system",⁵⁴ instead of just seeking a good balance between social stability and economic growth⁵⁵ with limited state intervention, applied extensive government intervention through industrial and distributional policies. The result was an economic enveloping and political decisional state presence that directly governed the Japanese labour market (Johnson 1982).

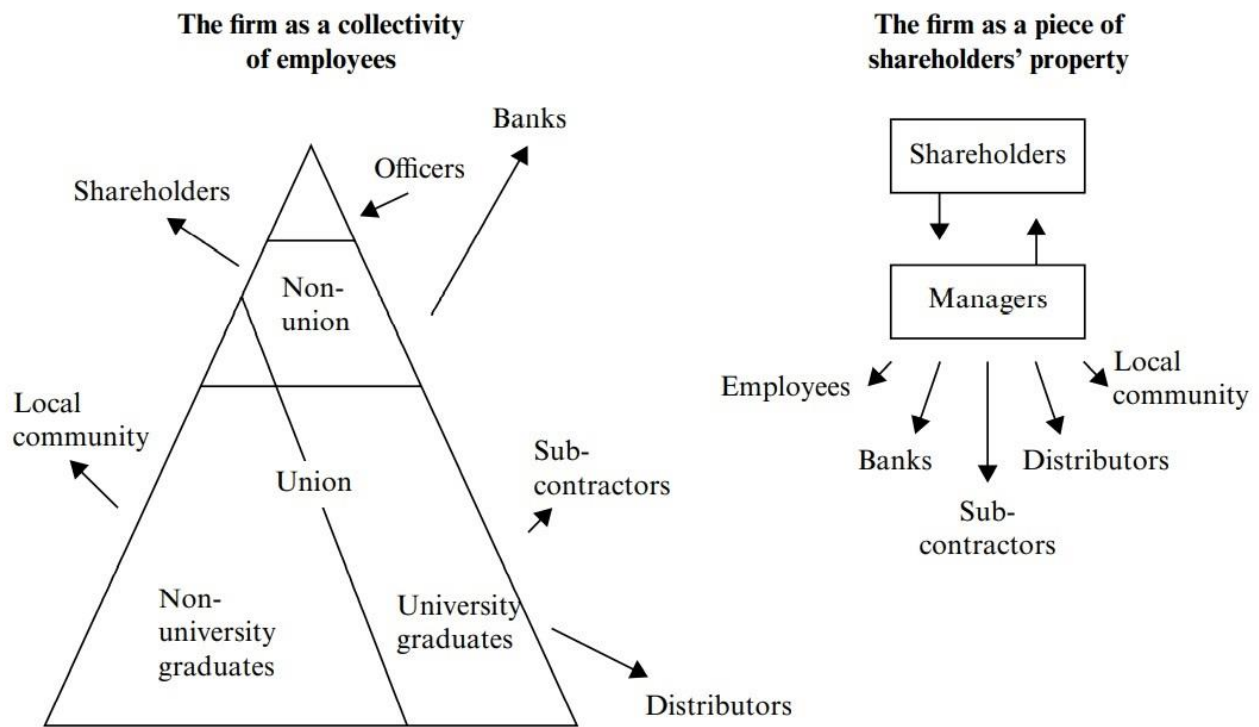


Figure 1.8. A comparison between a Japanese and an Anglo-Saxon firm (Dore 2013b: 32).

However, the post-war system, after significant economic successes until the early 1990s, had to give way to a series of structural economic reforms of the labour market, transforming the patterns of the Japanese market economy. This topic will be addressed again and in greater depth in the following chapter.

⁵⁴ The "1955 system" (1955-1993) is the model of Japanese capitalism that became relevant in the 1980s. This model was characterised by the near total political dominance of the LDP, from the foundation of the party until its first historic collapse in 1993, with its political defeat and the victory of a non-LDP coalition (Watanabe 2014: 56).

⁵⁵ The economic growth of the Japanese model was characterised by the so-called *kaizen* (改善, literally the term is made up of two words, *kai* (improvement) and *zen* (good), which can be translated as "continuous improvement"), that is the set of improvement activities that involve employees in all activities of the company (from management to production). This community-oriented and cooperative-growth perspective has determined the success and the good socio-economic balance of the "1995 system", especially due to the presence of centralised main banks and the peculiar system of stable shareholders and networks of cross-shareholdings of the *keiretsu* model. This system was particularly significant for moments of economic hardship (Dore 2000). This socio-economic structure, however, is slowly becoming weaker, especially the community-oriented side (Dore 2006). Indeed, the decision-making strength of main banks within *keiretsu* is weaker, the number of stable shareholdings and cross-shareholdings has decreased, along with the increased presence of general shareholders and foreign investors in the Japanese market (Ido 2013: 137-138).

Back to the comparison between Italy and Japan, it can be assessed that their labour markets are characterised by highly impactful processes and dynamics. These transformative processes have been underway for decades, but are gradually growing in importance and strength. Using the VoC perspective, it is critical to consider some of the main transformative mechanisms within the Italian and Japanese labour markets, in particular with the help of the dualisation process theory and the power resources perspective.

1.3.2. Italian and Japanese labour markets in transformation: dualisation process, power resources perspective and other aspects

Using the Varieties of Capitalism perspective is only the starting point for comparing Italy and Japan. This framework is made up of several dimensions and levels, but also of numerous social, political and economic influences. It is thus interesting to consider two other perspectives for the comparison of these two countries, as to confront political and economic dynamics that heavily influence their labour markets: the "dualism" (or "dualisation") of the labour market and the "power resources" perspective.

Dualisation theory consists essentially of the marked differentiation within the labour market between regular and non-regular workers. The labour market itself is divided into several segments, and this separation into different market areas can sometimes be nuanced. Regular workers are significantly more protected than their non-regular counterparts. In CMEs and MMEs,⁵⁶ this process usually results in a less (or limited) deregulation of the labour market and a greater limitation of the liberalisation processes (Thelen, Kume 1999a; 1999b; 2006; Emmenegger 2012; 2015; Watanabe 2018). In the Italian case, for instance, this dualism is twofold: the first dualism type, dating back to the seventies, created a unique and somewhat counter-intuitive internal division, i.e. between workers with open-ended contracts in large firms and those with open-ended contracts in small firms (whose numbers are of great importance); the second type of dualism is the standard (and more intuitive) one, i.e. between regular and non-regular workers, that can be tracked down with the neoliberal structural reforms of the late nineties and early 2000s (Sacchi 2013: 195-196).

Neoliberal processes entail the creation of one or more segmentation of the labour market. Usually, the labour market is divided into a primary labour market segment, where it is possible to find regular core workers (also referred to as "insiders"), well protected by law and generally

⁵⁶ LMEs are generally excluded in this process.

employed in large and economically solid companies, and a secondary (or peripheral) labour market, that is made up predominantly of non-regular workers (or "outsiders"). The non-regular workers in the second (or lower) segment of the labour market can be of various types (part-time, dispatched, fixed-term, etc.), they are endowed with less protection than regular workers and are generally employed in small and medium-sized enterprises (SMEs),⁵⁷ of which Italy and Japan present a truly significant number. Although these dynamics favour "cross-class alliance" arrangements between regular workers and employers in order to maximise productivity and employment security, globalisation and neoliberal economic policies are leading to a decrease in the number of core regular workers in all OECD countries.

Automation and digitisation in the production process, too, have helped an increased demand stimulus for high-skilled workers in the upper segment of the labour market, while in the peripheral one, low-skilled labour is still hugely required. All of these mechanisms generate a particular labour market configuration, a sort of hourglass-shaped figure. Within it a gradual decrease of medium-skilled jobs is taking place, replaced by technological progress achievements.

In summary, according to Emmenegger *et al.*: "*dualization is a process that is characterized by the differential treatment of insiders and outsiders and that can take the form of newly created institutional dualisms or the deepening of existing institutional dualisms*" (Emmenegger *et al.* 2012: 8).

Another theoretical perspective is that of "power resources". This perspective is based precisely on the balance of the resources' strength between workers and employers deployed in the political arena and class conflicts. More specifically, it is the interactions' power equilibrium that trade unions (labour) can create through their bargaining strength pressure *vis-à-vis* employers' associations (capital). Through trade union commitment to class solidarity and the possible "threat" of worker mobilisation, they can potentially shift socio-economic labour market stability and determine the degree of workers' employment protection. The variables that influence these interactions are, for example, the models of government or the party system (generally a government composed of a social-democratic majority is closer to labour's needs), union density, the type of trade unions (e.g. sectorial, industrial, enterprise, etc.), the concentration rate of trade unions or trade union confederations over the national and local territory (e.g. concentration or fragmentation of confederations), etc. (Korpi 2006; Watanabe 2018: 585).

⁵⁷ SME definition is not fully outlined or mutually agreed, as it is defined differently depending on national legislation and the relative size of each domestic economy. The OECD, for statistical reasons, defines SMEs as firms with no more than 249 employees. Specifically, SMEs are divided into medium (50-249), small (10-49) and micro (1-9) (OECD 2017a).

Analysing the Japanese case, while considering the power relationships from a macro perspective, it is clear that the labour market segmentation has been facilitated by some specific factors, such as the strong cooperation between state bureaucrats, conservative parties and Japanese business (in particular *keiretsu* business families), together with a marked political division of workers' representations between right and left ideologies (basically a very strong corporatist right wing and a relatively weak left wing). Japan's retrenchment of its already modest welfare system⁵⁸ since the 1980s is a further sign of labour's weakness in the face of the segmentation of the Japanese labour market, a manifestation of its inability to prevail in the power resources tension during collective bargaining agreement processes (Shinkawa 2005; Tanaka 2019).

Yet more evidence of both the dynamics of the Japanese labour market's dualisation and the persistent weakness of labour power resources compared to capital is the data on widening income and social disparity.⁵⁹ Although Japan's population decline is considered to be one of the country's major social problems, globalisation and neoliberal pressure have heavily affected the basis of the country's social balance without being countered by any effective socio-economic countermeasure.

A political-economic aspect not yet addressed, taking into consideration what has been presented so far, is the possibility of a convergence process concerning not only Italy and Japan but entire systems of market economies as well. Globalisation and neoliberal pressure have been (and still are) strong labour market transformative drivers, in particular through economic liberalisation and deregulation policies. This economic framework shift leads to predict a slow, but steady, mechanism of economic marketisation, pushing CMEs (and MMEs) towards political-economic configurations more and more similar to LMEs. However, the VoC perspective stands against this convergence hypothesis. In the following section, the VoC position on this issue will be briefly introduced. The entire concept will be addressed in more detail in the following chapter.

1.4. Against convergence: the VoC perspective

⁵⁸ It should be pointed out that there are differing opinions on this matter. For example, according to the theory of functional equivalents applied to the welfare system, the Japanese case presents alternatives to its meagre welfare expenditure, using "alternatives" to compensate for this lack. Specifically, through policies shared by the LDP and state bureaucrats, Japan has in the past focussed mainly on the employment system to compensate for the shortcomings of its welfare system. This was the case with state "developmentalism", which aimed at providing full employment through greater regulation and protection for low productivity labour market sectors, strongly linked to SMEs, self-employed workers and local agriculture. In this case, employment policies were used as functional equivalents of poor welfare policies. The combination of limited public welfare, the presence of corporate welfare in private companies, the protection of SMEs and the use of public works in regional areas (subsidies too) has contributed to equality and economic and social stability among citizens (Miyamoto *et al.* 2003, in Tanaka 2019; Estévez-Abe 2008).

⁵⁹ The other three, as mentioned above, are the combination of a rapidly ageing population, declining birth rate, and a huge deficit in public debt.

Convergence is a process directly related to globalisation dynamics and the neoliberal pressure to deregulate and liberalise labour markets. Yet, the VoC perspective seems to be extremely wary in considering that these international economic pressure factors can really modify the existing configurations of market economies for granted. Instead, VoC scholars expressly hypothesised the conservation of regime peculiarities as each of them has its own comparative advantages (Hall, Soskice 2001a: 62-66). Their economic systems' peculiar political-economic mechanisms are their shield against globalisation.

Recently, specifically, many questions have arisen as to whether convergence, an overall re-evaluation of domestic welfare systems and transformations of market economies is possible at a cross-national level. These questions are the result of several perspectives concerning severe periods of financial and economic instability, such as the 2008 global financial crisis (Coates 2005; Pontusson 2005; Ferdosi 2019). However, despite the lack of a medium- and long-term analysis, from a VoC perspective no convergence is taking place in the short term, not even under the political-economic stress imposed by the crisis.

Thelen (2001) has clearly expressed her opinion against the idea of a process of political-economic convergence. She, in turn, is at odds with the globalisation literature, that envisages a structural change in many countries. Countries that are characterised by strong labour are remoulding themselves into weak labour ones, a sort of regime conversion that has already been expressed in the corporatism theories. The main features of these alterations of pre-configured political-economic systems are the decentralisation of productions, the weakening of labour and its global representation, the deregulation of the markets, and several attempts to lower the cost of labour while implementing less restrictive employment policies (Thelen 2001).

A structural weakness of the convergence hypothesis derives from the fact that the convergence process is only predicted by theoretical arguments, but it is still at odds with empirical analysis. In particular, it is currently conflicting with international relations analysis at both the cross-national level and in collective bargaining studies. Since the increased presence of integrated global markets has incremented international competitive pressure, domestic solutions and economic strategies can be very different, while dependent on respective institutional configurations.

This issue will be addressed more fully in the following chapter, being compared with theories positive to the hypothesis of political-economic system convergence. In the final section of

this first chapter, the theoretically main topic of this comparative research will be presented, namely the independent variable of migrant workers.

1.5. The variable of migrant workers: a brief introductory outline of the characteristics of Italy and Japan

The most crucial element in this comparative thesis is the variable, in this case held as an independent variable, of migrant workers. Despite clear structural similarities between Italy and Japan, and the common deregulation and liberalisation policies that have increasingly applied in both market economies (even if at a different pace), the divergent numerical presence of migrant workers seems to suggest very different political-economic policy choices in addressing similar demographic dynamics and economic problems.

In order to better analyse this topic, the different types of welfare regimes must be taken into consideration, as well as the industrial fabric and the distinct political-economic regulation policies of the domestic labour markets.

Firstly, the case of Japan is considered in this analysis. Japan has historically never been considered a country of immigration. Indeed, Japan is notorious for its low migrant presence and the several difficulties for non-Japanese to integrate into its society (Brody 2002; Shipper 2008; Arudou 2015).

This is profoundly different for the case of Italy: in recent decades, the number of migrant workers who arrived in Mediterranean countries has reached, if not exceeded, those of the rest of Europe.⁶⁰ This phenomenon is important in light of the traditional socio-economic ties with Continental and Northern European countries, "typically" considered as receiving countries of migrant labour. Regional variations in the labour market and fresh political, economic and social transformations have underpinned the demand for migrant workers, while also changing the migration flow models.

This migration trend has also diversified the composition of migrant workers in Southern Europe: now they are younger and often are a first generation of migrants. In Italy, in particular, the majority of migrant workers are employed in low added-value productive activities such as in manufacturing, construction, agriculture and, most of all, in the domestic and personal care sectors.

⁶⁰ In the case of Italy during the 2008 global financial crisis as well (Fellini, Fullin 2018).

From a VoC perspective, the interactions between different types of institutional complementarities determine the structure of the labour market and the type of production systems. Consequently, they control the differentiated demand for labour different from core regular workers. Trade union arrangements, their political orientation (political party affiliation), and their policy strategy on the matter determine labour power *vis-à-vis* capital. The role of trade unions is fundamental to understanding the overall configuration of an economic and production system. To these features must be added the national labour regulations and labour laws, the type of political actions taken by capital (employers' associations), the coordinating role and the political configuration of the state (government and parties), the type of welfare regime, education and vocational system, skill production and training regimes, and technological innovation rates (Hall, Soskice 2001a; Amable 2003; Afonso, Devitt 2016; Fellini, Fullin 2018).

These institutional factors also govern the type and quality of employment in labour markets and influence, directly and indirectly, the demand (and the actual possibility of arrival) of migrant workers (Devitt 2011; Afonso, Devitt 2016; Fellini, Fullin 2018). Devitt analysed the variation in European socio-economic regimes both from the point of view of the supply-side (migrants) and demand-side (employers or state strategy). In this way, it was possible to explain theoretically the differentiation patterns and the numerical variation of migrant workers in Europe, through the study of each countries' labour market institutional arrangements. The overall number of native workers, their skill sets and, consequently, that of migrant workers, are shaped by the interactions of different socio-economic institutional features and configurations. These features are not only labour market institutions, but also, as mentioned before, the type of innovation processes, education, welfare state regimes and skill training processes. Devitt also points out that the care sector and the presence of migrant domestic care workers are greatly influenced by the different types of national welfare regimes and social services models (Devitt 2011).

The Italian framework can be explained by adopting the dualisation hypothesis advanced by Piore (1979). He tried to explain the high presence of migrant workers from a demand-side point of view, through the segmentation⁶¹ of the labour market (Piore 1979; Devitt 2011: 583-585). To be accurate, the presence of a strong dualised labour market is characteristic of both Italian⁶² and Japanese economic systems. The core regular workers (insiders), in both countries, are placed in the

⁶¹ Although the market is highly regulated, this has not limited the process of dualisation. On the contrary, it has further fuelled its polarisation, also thanks to the massive presence of an "informal" area in the low value-added part of the labour market. This is particularly the case in the contractual regulation/arrangements of small and family businesses and in the field of services through cooperatives (Fellini, Fullin 2018: 299).

⁶² The Italian labour market is considered two-tier in nature. The widening gap between its two socio-economic segments has increased since the structural labour market reforms of the mid-1990s (Cecchi 2013: 166-167).

primary segment of the labour market, while outsiders (non-regular workers) are in the secondary one, where the labour demand mainly consists of flexible, low-cost, low-skilled workers⁶³ who can be easily dismissed in the case of economic fluctuation.⁶⁴ Piore specifically mentions the "*distinction between migrant jobs and native jobs*" (Piore 1979: 39), as regards a parallel with the institutional distinctions that allow escaping from job-security arrangements. According to Castles and Kosack (1973), migration processes create wealth accumulation through low inflationary growth. This mechanism is only possible if migrant workers are positioned at the lower end of the labour market as cheaper supply of labour, unable to upgrade their employment position. Moreover, this should lead to a relaxation of migration policies (Castles, Kosack 1973: 5-14).

In recent years, the dualisation process in Italy has taken the form of employment downgrading (at least since the 2008 global financial and economic crisis),⁶⁵ while there is a strong connection between employment downgrading and the presence of a migrant workforce (Fellini, Fullin 2018: 312-321). It is an asymmetric segmentation process,⁶⁶ a polarisation mechanism towards the regular worker sphere with regard to the demand level for highly-skilled labour. In the Italian case, the growth of the low-skilled non-regular workers has supplanted the traditional type of asymmetric polarisation.

Former OECD Secretary-General Ángel Gurría statement (2017) suggesting that "*Italy is currently trapped in a low-skill equilibrium*" is particularly enlightening: it means that, as explained by Fellini and Fullin, Italian firms do not invest enough in technology-enhancing production processes and consequently do not require a highly qualified and high-skilled labour force (ANSA 2017; Fellini, Fullin 2018: 322).

In the VoC perspective, MME models commonly involve a considerable demand for a low-cost, low-skilled workforce. The same labour market demands are not found in any other schemes, not in the Nordic regime either, despite its universally more favourable and generous welfare state.⁶⁷ Irrespective of high MME unemployment rates, migrant workers tend to prefer destinations

⁶³ Engels' so-called "industrial reserve army" (Engels 1845).

⁶⁴ As "shock absorbers" (Piore 1979: 35-38).

⁶⁵ The processes were similar to those of other European nations in previous periods, i.e. upgrading in the 1990s and polarisation in the 2000s (Fellini, Fullin 2018: 312-321).

⁶⁶ In the period 1995-2015, according to OECD data, Italy and Greece were the only countries where the growth of highly skilled jobs did not exceed the percentage of low-skilled jobs. Generally, this process concerns immigrant women (OECD 2017b; Fellini, Fullin 2018: 312).

⁶⁷ It is important to note that in this case too, the paradox of the greater presence of migrant workers in areas covered by a welfare regime different from the universalistic one of the Nordic countries is that, from a functional logics point of view, laws related to migration regulation are less restrictive in countries where dualisation is more marked. Moreover, welfare expenditures for immigrants are much lower than pension expenditures (annual GDP less than 1%), and migrant workers act as net contributors to national social security schemes. Universalistic welfare systems, in addition, mean higher taxation, another factor that is not very appealing to low-skilled foreign workers. According to Borjas and his welfare-magnet thesis, the more generous welfare regimes attract more asylum seekers, but not labour migrants, unlike

such as Italy and Spain. This paradox is explained by the labour market's need to keep costs low and production flexible. At the same time, Mediterranean market economies have many difficulties in attracting native workers, who want to be employed in the higher segment of the dualised domestic labour market.

In order to understand migrant presence in Italy, it is also important to consider the particular structure of the Italian productive fabric, predominantly composed of SMEs. An industrial framework made up mostly of small and medium enterprises is more favourable to the employment of unskilled workers, in particular in small local and family businesses. This is even more marked when considered in conjunction with the lower coordination and regulation levels compared to the CMEs, and their general tendency towards a lower level of controls on labour and employment standards. Nonetheless, this framework appears congenial to (lower) socio-economic needs of migrant workers.

Japan, on the other hand, fully represents an ideal CME, even if it is very similar to Italy in many aspects.⁶⁸ Some of these similar dynamics are: low unionisation rate and strong presence of SMEs, generalist education unrelated to the real needs of the labour market (in Japan the process of skill formation takes place almost entirely within the companies),⁶⁹ welfare system considered meagre and cash transfers to families as the main economic remedy to social problems, strong dualisation of the labour market, high demand for cutting production costs and the constant need to make workers more flexible. Considering these characteristics, it may seem that Japan is an attractive destination country for South-East Asian workers. With its rigorous anti-immigration policies, however, due to different political-economic solutions for labour market needs and an important number of cultural peculiarities, Japan still seems to be an anti-immigrant stronghold.

The new partial amendment to the Immigration Control and Refugee Recognition Act (ICRRA, also known as Immigration Control Act or ICA) of 8th December 2018,⁷⁰ established new

the continental welfare regimes that attract both categories and liberal welfare regimes, which do not attract either of them (actively restricting entry to asylum seekers) (Borjas 1999; Afonso, Devitt 2016: 601-602).

⁶⁸ Although the transition from (direct) family ownership to dispersed joint-stock ownership and bureaucratic control occurred most strongly and radically in Japan rather than in Italy. Despite this, Japan is still characterised by a high number of family businesses within the founder family influence (Dore 2013b: 27).

⁶⁹ This particular type of skill formation was an element that allowed Japan to be included in the VoC archetype of CMEs. In particular, the long-term accumulation of specialised skills among workers has created the well-known competitive advantage in the mass production of high value-added products placed on the global market.

⁷⁰ This reform of the ICRRA has established two new types of residence status, namely the first called "Specified Skilled Type 1" (in Japanese *tokutei ginō ichi gō*/特定技能一号) and the second "Specified Skilled Type 2" (in Japanese *tokutei ginō ni gō*/特定技能二号). Basically, the reform greatly broadens the access to semi-skilled workers, who were previously unable to enter and work in Japan except through several "side-doors", such as the "Technical Intern Training Program" and its new versions. Another way to work in Japan was to be accepted as highly skilled and professional workers, according to a points system. Type 1 appears to affect workers involved in the Technical Intern

limited channels for residing in the country. Even if it imposes strict regulations regarding the presence of migrant workers in Japan, it seems to be a first step towards meeting the needs of the labour market and, in particular, of Japanese SMEs (Hamaguchi 2019a).

The comparison between skill formation processes of the two countries, too, is crucial to be able to understand this analytical variable. Japan's skill training process is internationally known for being entirely performed within companies, as well as for its generalist system of compulsory education. This configuration seems to provide the necessary number of skilled workers, fully domestically trained. Italy, with its numerous SMEs and its low trend towards innovation, needs a large number of low-skilled workers. They are more easily found outside its borders, despite the low-rate of vocational training coordination between industrial relations actors and the compulsory educational system. This framework also allows companies to invest less in skill production and thus cut general production costs (Ruhs, Anderson 2010; Afonso, Devitt 2016: 600-601). Taking complementarity levels into account, the lack of coordination between collective bargaining coverage, skill training processes and welfare institutions lead to the creation of a large low-wage and low-skill labour market segment, which is sought first and foremost by migrant workers (Afonso, Devitt 2016: 601).⁷¹

The migrant labour topic will be addressed again, in greater depth and detail, in the second and subsequent chapters. It is, in fact, the main theme of the next chapter and the independent variable that will aid a better understanding of the recent (and future) political and economic dynamics in the two socio-economic systems. In addition, it will become relevant in the analysis of the other research questions, in particular about the transformation of Japanese migration policies according to the needs of the domestic labour market.

Training Program, allowing them to stay at the end of the programme period, while Type 2 refers exclusively to highly skilled workers with a minimum supervisor role. This issue will be addressed in more detail in the following chapters.

⁷¹ Again, as in previous mentions to migrant workers, the reference is to the foreign labour force coming mainly from non-EU countries or from specific Eastern European countries.

Chapter II: Migrant workers in Italy and Japan. From labour migration models to industrial relations regimes

2. Introduction

Migration has become an extremely important component in contemporary advanced industrial societies and their labour markets. This is particularly noticeable in an international context strongly influenced by globalisation.⁷²

Migration and migrants enmesh different national social, economic and political spheres (Oesch 2013: 83). Indeed, since the 1990s, most contemporary electoral campaigns include crucial public debates about migrants and migration issues (Natter *et al.* 2020: 3). This kind of debate could regard problems related to economic migrants but also matters for asylum seekers and refugees, forced migration, or even environmental issues. Regulation and control of migration are topics that have become very important in recent years' public debates and governments' political agendas (Ambrosini 2020: 225).

Although not only a prerogative of political right-wingers, the contemporary rise of far-right populist parties has led to a highly heated political confrontation in which parties of the left and right⁷³ have often clashed to win votes (or to avoid alienation of their traditional constituents) by promising restrictions of migrant access to welfare services and a more general tightening of

⁷² It is useful to define at this point what globalisation is, a phenomenon that has multiple definitions and whose impact affects innumerable aspects of people's lives as well as socio-economic-political changes in nations (Bamber *et al.* 2004b: 2-3). Globalisation is often referred to as the set of changes in the international economy, in turn associated with increased trade in goods and services, greater foreign investment, the quantitative growth of international financial transactions, and various other levels of interconnectedness of international economic activities (Wade 1996, in Bamber *et al.* 2004b: 2-3). Isaac (2003), defines the phenomenon of globalisation as a process already present but described in refreshed words: "*At the end of the 19th Century, goods and services, money in the form of silver and gold, ideas, practices and people moved across state boundaries freely throughout most of the world. In recent years we have come something close to that world, except that the movement of people is now restricted, and that technology, especially in the speed of travel and communications, has created a completely new dimension to the economic, social and cultural integration of the modern world we now term 'globalisation'.*" (Isaac 2003: 1).

⁷³ But still differing in quantity and extent in their electoral promises (Natter *et al.* 2020: 3). It is important not to simplify the view of a political right against immigration, whereas a political left always being in favour of it, in an overall "by design" relation (Natter *et al.* 2020: 5). In fact, parties are historically internally divided on the issue, usually split between a more economic or a more socio-cultural tradition approach. For example, right-wing parties can be divided between those who are more oriented towards restrictive immigration policy reforms (cultural conservatism) and those who are more oriented towards liberal immigration policy reforms (market liberalism linked to forms of employers' lobbies); left-wing parties, in turn, can be more pro-immigration (international solidarity linked to liberal ethnic groups who tend to lobby for more open policies), or against it (market protectionism in accordance with the protectionist positions of trade unions in the safeguard of domestic regular workers and the general prevention of downward pressure on wages and working conditions) (Perlmutter 1996: 378).

national border controls (Davis 2012). The topic of migration has seen an overall increase in its politicisation and an increasing role of parties in the making of migration policy (Natter *et al.* 2020: 4).

At the same time, existing structural dynamics, such as population ageing, low birth rate and shrinking working-age population intertwine with issues related to economic and labour market policies. Both of these dynamics are in turn connected to and influenced by different migration factors. Socio-economic institutions, such as the welfare state and labour markets cannot exclude the variable of migrant workers. Neither do industrial relations, governments' economic policies nor skill-training structures. The triad of capitalist economic institutions consisting of state, business and labour interact with labour market institutions, welfare and education in a mutually compelling way of shaping economic and migration policies, in continuous influencing and causal processes.

Types of migration flows and the varieties of capitalism approach, which were introduced in Chapter I, mutually influence each other. There is a solid link between the type of national economic coordination and migration-related policies (Menz 2010). Migration flows, migrant workers' professional skills, educational levels, and pre-existing migration networks directly influence national (and trans-national) socio-economic institutions. In turn, migration and economic policies, labour market structure, unemployment rate, native population's education level, degree of technological and R&D productive innovation are determinant variables that influence the quantitative and qualitative demand for migrant workers. Briefly, the market demand for migrant workers shapes the type of migration flow pattern.

As just mentioned, economic factors are central in driving migration flows, in particular labour migration flows (McGovern 2007: 219). According to McGovern (2007: 218) "*immigration raises theoretically important questions for political economy as a whole, and the way immigration interacts with capitalist institutions can be captured with concepts used in other areas of the discipline*". These concepts, which in turn interact with each other, are the processes of liberalisation,⁷⁴ segmentation,⁷⁵ substitution and complementarity (McGovern 2007, in Afonso,

⁷⁴ The liberalisation process consists of the replacement of socio-economic institutions by pure market forces (Afonso, Devitt 2016: 593). In its interaction with immigration, liberalisation can "use" migration as a tool to divide and reduce the working class's capacity to contain and regulate market forces. In fact, migrants act as a break with traditional habits and social norms (a positive factor for economic innovation), but at the same time they can undermine the compactness of the working class by accepting lower working conditions and wages than native workers. (Afonso, Devitt 2016: 593-594).

⁷⁵ This is the idea that the market can be "*divided into separate submarkets or segments, distinguished by different characteristics and behavioural rules*" (Deakin 2013: iii, in Afonso, Devitt 2016: 593-594). The process of segmentation corresponds to Piore's dual labour market theory (1979), i.e. in the separation between a socially and economically superior sector (primary sector) and a sector inferior to it (secondary sector). In segmentation, the role of immigration is not necessarily negative in terms of quality of work and level of wages of the native workers, as there is no direct competition in the market (McGovern 2007; Afonso, Devitt 2016). Segmentation can act as a contrast to the

Devitt 2016: 593).⁷⁶ These processes are linked to national socio-economic institutions (also to various other actors), and to the migration flow patterns which act on complementary, non-competitive perspectives (Afonso, Devitt 2016: 593-596).

Figure 2.1 presents the degree of market embeddedness in advanced industrialised countries (OECD) derived from the relationship between the index of levels of political-economic coordination (CMEs and LMEs) and the number of incoming migrants per year divided by the national total population (Witt, Jackson 2016, in Afonso, Devitt 2016: 594).⁷⁷

process of globalisation, as the lower end of the labour market can be an alternative to exporting production processes to lower labour cost countries (Palier, Thelen 2010). It can also be a vehicle of greater flexibility as companies employing a large share of migrant workers tend to use less traditional contractual measures that "affect" them in particular (e.g. fixed-term, part-time contracts, etc.). Companies tend, at the same time, not to modify measures more related to the higher end of workers and to their contractual security or to types of flexibility within the company dynamics, such as overtime work (Raess, Burgoon 2013).

⁷⁶ The processes of substitution and complementarity are linked to those of immigration because, in both cases, migrants integrate and/or "fill" the gaps left by national socio-economic institutions. For example, the substitution process is what can happen between public institutions and private subjects when the former somehow "fail". According to Locke *et al.* (2013), "*private regulation may either substitute rules that the State does not enforce, or bolster public rules through some form of institutional isomorphism*" (Locke *et al.* 2013, in Afonso, Devitt 2016: 595). This may be the case of migration dynamics, which can create a process of "substitution" to the shortcomings of public institutions (such as the lack of skill training and/or compulsory education in its interactions with the labour market. Migrant workers simply respond to the demand for skilled labour created by the skill mismatch of the national education/skill training system). Far from being a definitive solution to a nation's skill deficits, it can be an excellent temporary solution, especially during specific periods of productive need. Important cases are that of the care sector in Southern-Mediterranean welfare countries and US labour market (Afonso, Devitt 2016). Another case of substitution may be that of migration according to policies that facilitate women's employment. For example, the arrival of migrant workers may be a replacement factor for the national female labour force, but it may also be an additional motivation not to undertake or strengthen public policies to support working mothers (such as childcare infrastructures) (Afonso, Devitt 2016; Devitt 2016). As far as the process of complementarity is concerned, immigration can act as a complement to the productive characteristics and the characteristics of pre-existing socio-economic institutions by mirroring the peculiar logic of functioning (Afonso, Devitt 2016). For example, a labour market that needs workers with certain technical characteristics can solve these specific needs with migrant workers coming from abroad. The principle, in this case, is to reinforce/strengthen existing institutional arrangements rather than any form of contrast/undermining through a substitution process (Afonso, Devitt 2016). Immigration control can also be considered a form of complementarity to national coordination, allowing trade unions and public authorities to maintain their bargaining power through labour supply management (Bucken-Knapp 2009).

⁷⁷ Index $r=-0.34$, indicating that this correlation is not very strong (Afonso, Devitt 2016: 596). However, it is clear from the figure that countries with LME-type economies tend to receive more migrants than CME-type economies.

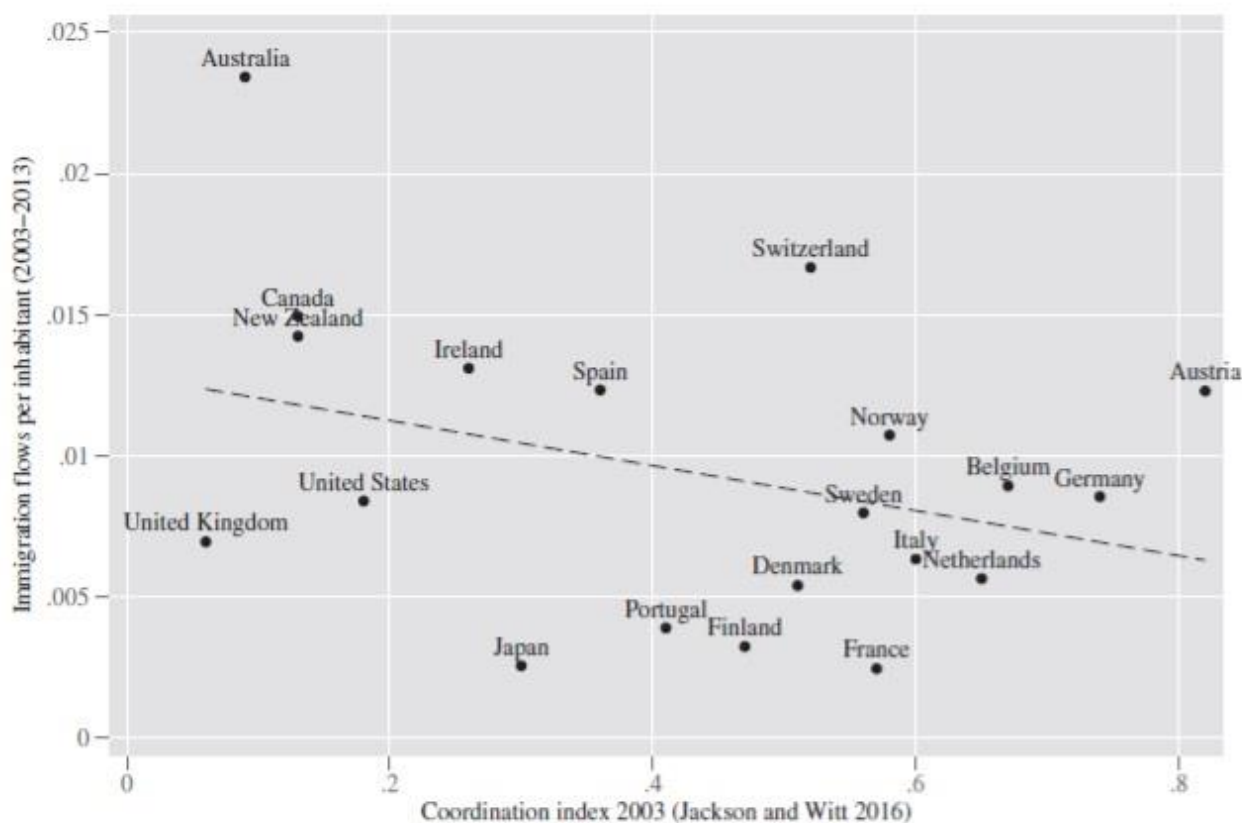


Figure 2.1. Degree of market embeddedness in advanced industrialised countries: coordination levels and immigration flows (Witt, Jackson 2016, OECD migration and population databases, in Afonso, Devitt 2016: 594).

Amid these processes, however, some variables are not just economic ones. Instead, social and cultural factors, which are apparently at odds with the logic of capitalist models, restrict economic and migration policy choices. An example is Japan, which, despite being entirely embedded in the above-mentioned mechanisms, has made different migration policy choices in comparison to most of the other highly developed countries. Japan is partially at odds with Italy's policy choices, especially in certain sectors of the labour market. Social and cultural factors seem to have played a decisive role in this antithetical decision-making direction (Beretta *et al.* 2014a: 3).

This chapter is divided into three main sections. The first part deals with a general description of migration patterns and the definition of labour migrants. Thus, a comparative perspective of the particularities of the Italian and Japanese cases are gradually introduced in the analysis. In this section, the role of migrants in both socio-economic systems is considered as well. Lastly, it presents the origin and a general categorisation of the migrants in the two countries.

The second part deals with the analysis of the role of the different socio-political-economic actors in the Italian and Japanese tripartite systems. Their role will be explored regarding the current

situation of migrant workers. This section will be a prelude to the analysis to be carried out in the subsequent chapter based on the results of the interviews done in the fieldwork for this thesis.

The final part of the chapter will speculate on the future of these two case studies, paying particular attention to the possibility of convergence in Japanese policy choices towards European (Mediterranean) models. Alternative theories that, unlike the VoC approach, assume systemic convergence paths across countries will also be explored.

Part 1.

2.1. Labour migration models

"Migration for employment is an important global issue, which now affects most countries in the world. Two major labour market forces are in operation today that result in increased migration for work – many people of working age either cannot find employment or cannot find employment adequate to support themselves and their families in their own countries, while some other countries have a shortage of workers to fill positions in various sectors of their economies. Other factors include demographic change, socio-economic and political crises, and widening wage gaps within, as well as between, developed and developing countries. There is consequently much movement across borders for employment, with women independently migrating for work in considerably greater numbers than in the past and now comprising about half of all migrant workers."

(ILO Multilateral Framework on Labour Migration. Non-binding principles and guidelines for a rights-based approach to labour migration. ILO 2006: 3)

Models of labour migration are plentiful. They aim to formalise the determinants that regulate migration processes, as well as their effects on the sending and receiving countries. These determinants are shaped by economic, social and/or cultural elements. Moreover, they result in being a mixture of endogenous factors (personal migration decisions based on subjective evaluations) and exogenous factors (interrelation between opportunities in the country of origin, benefits in the country of destination and overall migration costs). International mobility studies have evolved from studies in the American sociological tradition of adjustment in the country of destination, through the transnationalism studies of the 1990s driven by globalisation and the

revolution in communication methods and transportation (Liu-Farrer 2020: 10-13), to the more recent (and complex) paradigms based on the "mobility turn" or "new mobility paradigm" (Urry 2000; Urry 2007). These new patterns are based on the analysis of institutional frameworks, material infrastructures and social systems related to physical and virtual mobility, which have numerically increased and further blurred the categories of migrants (Urry 2000; Urry 2007; Liu-Farrer 2020: 10-13).

Ultimately, labour migration models want to provide an analytical framework to identify the different influencing factors that shape migration mechanisms, to schematise migration patterns and predict the possible impact of exogenous shocks on migration processes. Despite the different perspectives resulting from their inherent differences in propositions, assumptions and hypotheses, they are not necessarily mutually contradictory. Rather, each possesses a certain degree of global coherence based on different conditions of analysis (Massey *et al.* 1993; 1998).

Different disciplines adopt different determinants to identify the type of labour migration pattern: economic disciplines mainly use the exogenous economic determinants described above (with the help of statistical and quantitative methods), sociological studies tend to add non-economic variables that identify the rational choice of individual actors as the main driving force behind migration (with emphasis on the social processes of migration), while anthropological studies focus on ethnographic approaches including historical, cultural and political-economic variables. Theoretical approaches to international migration are also divided into two main categories, namely those related to the beginning of the migration process and those related to its perpetuation (Massey *et al.* 1993; 1998; Schoorl 1995).

Some of the most relevant labour migration theories and models, among the many that attempt to explain international economic migration processes are presented below.

2.1.1. World Systems Theory

The World Systems theory (or world-systems analysis/world-systems perspective) is a complex migration model created by Immanuel Wallerstein during the beginning of the 1970s, that involves different levels of interactions between individuals, economies, labour markets and the globalisation process.⁷⁸ It is an attempt to explain migration processes at a systemic/structural level. It also

⁷⁸ The definition of world-system given by Wallerstein in 1974 is as follows: "...a social system, one that has boundaries, structures, member groups, rules of legitimation, and coherence. Its life is made up of the conflicting forces which hold it together by tension and tear it apart as each group seeks eternally to remold it to its advantage. It has the

explains how interactions between different societies can be determinants of social change within the same societies.

Wallerstein, who developed the best-known approach to the world systems theory, divided the world into three different interdependent areas, the core,⁷⁹ the semi-periphery⁸⁰ and the periphery.⁸¹ In these three areas, there is a definite division of labour. It is further characterised by economic penetration dynamics from the core and semi-periphery countries to periphery ones (Wallerstein 2004).

Core countries are at the centre of the world's economic and production decisions, they focus on capital-intensive productive activities and rely on high-skilled labour. Periphery countries, on the other hand, are characterised by the presence of labour-intensive productive activities and low-skilled labour, as well as by economic areas which have raw material abundance and established mechanisms of raw material extraction (Lechner 2001). Semi-periphery countries are in an intermediary position, pursuing the main objective of becoming core countries. This classification is not permanent, and countries in one area may upgrade or downgrade their position over time, although core countries tend to constantly strengthen their economic dominance over other areas (Lechner 2001). Even trade relations between countries can lead to one's economic decline, thus creating a favourable situation for migration to countries with a higher demand for labour and a more solid economy (Jennissen 2007).

These dynamics are considered the main causes of the current labour migration flows (Sassen 1991; Massey 1999; Harris 1995).⁸² The introduction of capitalistic/industrial core practices modify local production processes, hence disrupting lifestyles and national economies. This transformation involves all the peripheral areas, which are gradually being incorporated into the global economy and thus starting a slow upgrade process towards the hierarchically "central" area. Such a change forces part of the periphery's population either to adapt to the new circumstances or to migrate to other countries, specifically to those belonging to the core areas. These dynamics go

characteristics of an organism, in that it has a life-span over which its characteristics change in some respects and remain stable in others. One can define its structures as being at different times strong or weak in terms of the internal logic of its functioning." (Wallerstein 1974).

⁷⁹ Core countries were originally the European colonial powers (e.g. Great Britain, France and the Netherlands), and then increased with the arrival of other world powers such as the United States, Canada, Australia, New Zealand, Japan and much of Western Europe (Chase-Dunn *et al.* 2000; Lechner 2001; Babones 2005). In fact, core countries can be traced back to before the 13th century, such as with the kingdoms of Mesopotamia, the Roman Empire, the Persian Empire, etc. In the course of human history, core countries have changed repeatedly.

⁸⁰ The most significant examples of semi-peripheral countries are Brazil, Argentina, Mexico, China, India, Indonesia, Poland, Greece, South Africa and Israel (Wallerstein 1974; 1976; Terlouw 1992; Chase-Dunn *et al.* 2000; Babones 2005). This classification is also variable and depends on the author.

⁸¹ All other countries, in particular most African and Asian countries.

⁸² The term "world systems" refers, in fact, to the subdivision of countries from the point of view of interregional and transnational division of labour.

beyond both the individual migrants' choice (or of his/her household's) and the characteristics of the economy of the departure and/or arrival countries (Brody 2002: 21-22).

A weak point of this theory is the difficulty in explaining the struggle of a national government in stopping migration flows or justifying the definitive allocation of migrants (even when the demand for labour from core countries has stopped). Basically, with this model, it is easier to explain pull factors rather than settlement factors (Brody 2002: 21-22). Other relevant criticisms are that the world systems theory is too tied to economic factors concerning cultural variables and that it is overly bound to the actions of the core countries, resulting in being too focussed on the central role of the states (Barfield 1998).

2.1.2. Push-Pull Theory

The Push-Pull theory⁸³ is probably the best-known migration model, deriving from concepts associated with one's individual economic decisions. It is part of neo-classical economic theory, which describes the phenomenon without necessarily binding itself to the analysis of international laws and national migration policies. It is a model in which individual "rational choices" (or "aggregates of individual decisions"), combined with a personal migration project's cost-benefits, has the upper hand over other possible variables (Brody 2002: 18-19).

Social, economic and political disparities between countries lay the very foundations of this model. The country of departure creates the "negative" push⁸⁴ circumstances for which the individual decides to migrate, while the "positive" economic, working and living conditions of the destination country represent the pull factors.⁸⁵ Fundamentally, the decision to migrate is a compromise to seek better standards of living, linked to the search for a better economic, social and political personal condition. To put it simply, large economic and wage disparities are the main cause of migration between different geographical areas (Jennissen 2007).⁸⁶

The decision to migrate may not only be closely associated with the individual's own will, but with the household or to a wider familial and/or community structure as well. In this case, such a dynamic is related to the new economic theories, which see the household as the main social

⁸³ This theory was first coined by the geographer Ernst Georg Ravenstein in the 19th century.

⁸⁴ The most well-known push factors (in labour migration) are lack of work, inadequate living conditions, few opportunities for personal fulfilment, etc., which can be added to other exogenous factors triggering migration processes, such as natural disasters, desertification, risk of death, persecution for social/political/religious reasons, etc.

⁸⁵ The most well-known pull factors are more job opportunities (also more high-wage jobs), better living conditions, skills training opportunities, education, social/economic/political security, etc.

⁸⁶ There are other factors like, for example, ethnic/racial, political, religious, environmental ones, which will not be explored here.

entity triggering the migration process (and not only an individual economic rational choice). Households "dispatch" family members to countries that can be a source of remittances to send back home so that they can not only help maintain their family but also partially stimulate their home country's economy through the circulation of money (Jennissen 2007).

Criticism of this model relates to the fact that the role of the state is almost completely ignored, often seen as just a passive subject. On the contrary, it is not unusual that governments initiate specific migration policies aimed at attracting labour migrants with specific skill sets or individual characteristics. These policies could include active recruitment practices on a transnational level (Brody 2002: 18-19).

Whether migrants make rational choices in their migration plan is an oft-recurring question. This approach is generally criticised as whoever undertakes determinant migratory choices is not just a computer and is far from being infallible. Besides, there is the possibility that the migrant can free himself/herself of push-pull factor constraints and can make different decisions. Critics of this model claim that what drives migration are exogenous factors such as a different set of opportunities, or indeterminate factors (psychic factors), which in turn are influenced by migration-related variables (feedbacks) (Böhning 1981: 36). A further criticism is the difficulty in explaining the reasons why, once the pull factor's attractiveness is concluded, migrants decide to settle in the arrival country and do not opt to return to the country of origin (Brody 2002: 18-19).

2.1.3. Dual Labour Market Theory

The Dual Labour Market Theory, already discussed in Chapter I, justifies transnational labour migration through the central role of national labour markets. It envisages a division of the labour market into two strata, with the first one demanding high-skilled workers and the second one characterised by intensive labour and by the need for low-skilled, low-cost workers (Piore 1979). Moreover, it predicts that the causes of migration are mainly due to a labour market's pull factors generated by industrially and economically advanced countries.

In addition to the analysis of a market's wage structures, dual labour market theory takes into account not only economic but also social factors (Piore 1979). Social status and hierarchy play a decisive role in the composition of the labour market design. In short, native workers chose not to be employed in socially low-status jobs, which results in a highly-rate of vacant positions. Migrant

workers are the labourers who, preferring a proportionally higher wage to a better social status,⁸⁷ take the place of native workers in the most demanding and socially despised occupations.

Depending on market economic situation and fluctuations, the labour market can increase or decrease its structural demand for low-cost workers with lower social demands, as "shock absorbers". The real magnet for low-skilled migrant workers is the secondary labour market segment (Piore 1979: 35-38). This model differs from the previous ones in that, according to neo-classical theory, the initial need for labour in the lower segments lead to an increase in those strata's wages, resulting in a higher migration incentive (Jennissen 2007). Native workers (as well as the associations representing them) oppose this increase in wages in the secondary labour market segment, because of the structural economic inflation problem (Piore 1979, in Brody 2002: 19-21).

Criticism of this theory is mainly focussed on the absence of any motivations that are not connected to labour markets, such as factors related to the family and national migration policies. Moreover, it is also criticised for the lack of explanation of the permanent nature of current international migration flows. On the contrary, this theory appears to be very solid in the explanation of the continuous demand for workers even in countries with a low unemployment rate (or where the unemployment rate is 0%, theoretically speaking) (Brody 2002: 19-21).

2.1.4. Globalisation Theory

The Globalisation theory was created by a group of scholars to respond to the criticisms made against the previous theories, i.e. the permanent settlement and the persistence of migration flows even when the demand for a specific workforce ends. In this theory, the role of the state is central, as is the demand for foreign labour. Moreover, this theory provides a model of labour migration based on the principles of globalisation processes on both markets and rights (Hollifield 1992; Kritz *et al.* 1992; Lim 1992; Sassen 1996, in Brody 2002: 22-24). Instead of individually assessing the variables of personal choice, labour market characteristics and the dynamics of capitalist penetration in peripheral countries, globalisation theory evaluates the combination of social factors (ethnic transnational networks) and political factors (state recruitment policies, liberal rights-based policies, etc.) with market factors (structural demand for labour, economic integration processes). This combination tends to create a "*highly conditioned and structured [phenomenon] embedded in complex economic, social, and ethnic networks*" type of migration (Sassen 1996: 163, in Brody

⁸⁷ This dynamic is sometimes called "migrant mentality" to describe the initial lack of interest in the social status or the social stigma of the job in favour of income (Tsuda 1998).

2002: 22). Economic globalisation, like the integration of national economies into highly interdependent supranational systems, is a fundamental determinant of migration mechanisms. These dynamics consist of the globalisation of markets that includes not only goods, services and capital, but also labour and skills (Hollifield 1992: 222).

Sassen's "globalisation thesis" (2001), too, connects migration processes to the dualised labour markets. In so-called "global cities" there is a demand for high-skilled foreign labour in the primary layer of the labour market, and for low-skilled foreign workers in the secondary one (Sassen, 2001: 321-323). According to Sassen (1999), governments have less power to regulate migration policies due to globalisation and all the phenomena connected to it (supranational regulatory institutions, common markets, international finance, etc.), leading to the fact that *"corporations, markets and free trade agreements are now in charge of 'governing' an increasing share of cross-border flows, including cross-border flows of specialised professional workers as part of the international trade and investment in services"* (Sassen 1999: 177).

To explain the phenomena of permanent settlement and the persistence of labour migration flows even in the absence of labour demand, this theory includes complex processes like factors of international and transnational relevance, such as changes in international relations and economic systems, in norms and procedures for the recognition of human rights, and the nature of national sovereignty. For example, changes in an international human rights regime (family reunification policies, education and housing rights, etc.) and the nature of sovereignty⁸⁸ can lead to permanent settlement processes⁸⁹ when they were previously only temporary, as was the case with guest workers (*gastarbeiter*) in Germany. Human values, social and civil rights are among these variables of social change (Brody 2002). However, Sassen's "globalisation thesis" has been criticised for its excessive reductionism (Hansen 2002: 263-264).

2.1.5. Osmosis Theory

A recent migration theory called the "Osmosis Theory of Human Migration", developed by Djelti (2017), is not limited only to spatial and temporal concepts of existing migration theories, but it also studies the evolution of the natural determinants of human migration history, which may provide a

⁸⁸ In a decentering process that, due to the convergence between economic globalisation and the increasing recognition of international human rights, causes a shift in the limits of a country's central power in the regulation of permanent settlement rules and in its migration policies (Sassen 1996).

⁸⁹ Also the creation of ethnic migratory networks and transnational communities that reduce the costs and risks of migration (Massey *et al.* 1993; 1998).

holistic view on the whole migratory phenomenon (Djelti 2017a; 2017b). The term "osmosis" refers to the analogy between migratory processes and the chemical osmotic phenomenon. The movement of labour migrants from a country with less migratory pressure to countries with greater migratory pressure recalls the passage of water (in this case migrants) through the edges of the semi-permanent membranes of organic cells (i.e. countries). The measurement of migration pressure from one country to another corresponds to the natural determinants of migration, as well as the osmotic pressure between cells. This theory divides migration processes into simple and complex ones, and the former ones are further divided into three periods called diffusion, stabilisation and concentration. In simple migrations, the determinants triggering migration processes are linked to simple factors such as population density, social security, climate change, etc. In complex migrations, the migratory choice focusses on complex structural factors, including wages, migration policies, unemployment rate and migration networks (Djelti 2017a; 2017b).

2.2. Migrants and labour migration: definition and historical perspective

Before a specific examination of the Italian and Japanese cases, it is necessary to clarify who is covered by the analytic variable of migrants. In particular, it is of importance to define who are the so-called "economic migrants" (or labour migrants). According to the Commission of the European Union, an economic migrant is defined as "*a person who leaves their country of origin purely for economic reasons that are not in any way related to the refugee definition, to seek material improvements in their livelihood*" (UNHCR 2022, European Commission website),⁹⁰ while the term economic/labour migrant is defined as "*a person who is to be engaged, is engaged or has been engaged in a remunerated activity in a state of which they are not nationals*" (Art. 2(1) of the UN Convention on the Protection of All Migrant Workers and Members of their Families, OHCHR 2022, European Commission website).⁹¹ Finally, the definition of labour migration is "*[the] movement of persons from one state to another, or within their own country of residence, for the purpose of employment*" (IOM Glossary on Migration, 2nd. edition, 2011, European Commission website).⁹²

⁹⁰ https://ec.europa.eu/home-affairs/pages/glossary/economic-migrant_en. According to surveys by Teitelbaum and Russel (1994), it is estimated that about half of the migrants live and/or work in the so-called developed countries, while the remaining half migrate within Third World countries.

⁹¹ https://ec.europa.eu/home-affairs/pages/glossary/migrant-worker_en.

⁹² https://ec.europa.eu/home-affairs/pages/glossary/labour-migration_en.

Although the term "economic migrant" has recently become quite popular, notably from the beginning of the "globalization era" (Brubaker 1992; Weiner 1995),⁹³ it is a phenomenon that had been existed for a long time (Brody 2002: 15). Mainly for economic reasons, in their modern history states have undertaken (cyclically) immigration and emigration policies.⁹⁴ Most of the time, the reason behind these policy choices was to deal with moments of labour shortages through the encouragement and promotion of foreign entries into the national labour market.⁹⁵ Some examples of these policies may be the opening (or relaxation) of national borders, recruitment programmes (within a country or from abroad) and sponsored migration networks.

The forced migration of the nearly eight million Africans into Europe and America since the 17th century can also be seen, albeit obliquely, as a kind of labour migration encouraged directly by state systems. In fact, in terms of numerical and economic importance, the slave trade only differs from contemporary labour migration because of minor coercive factors and due to the lack of systematic use of violence (even if it is not always absent) (Zolberg 1981).

Since the end of the Second World War, states supported a new system of labour migration. This mechanism created the so-called "guest worker" system, where migrants were considered a "commodity" (Weiner 1995: 25, in Brody 2002: 16). Following the post-war, economic reconstruction period, several Western European countries entered into a phase of economic boom. Those countries needed to import pools of low-cost and temporary workers to solve the labour shortage problem caused by the expansion of production and markets. Migrants were an actual safety valve for national economies in case of economic needs. The economic sectors most affected by the presence of this type of labour migrants were the low wage productive ones (Munz, Ulrich 1997: 79). The countries concerned with this system were mainly Germany, France, Belgium, the Netherlands, Switzerland and Belgium, while migrant workers came primarily from Southern and Eastern European countries (Salt 1981).

The concept of "temporariness" decreed the initial success of this form of controlled migration policy: migrant workers were expected to return to their country at the end of the

⁹³ It is complex and difficult to identify the beginning of the globalisation process. However, in the terms given here, its beginning is dated to the 19th century (industrial revolution, transport revolution, expansion of industrial trade, imperialism and colonialism), and then becoming increasingly advanced and "globally" widespread during the 20th and 21st centuries (O'Rourke, Williamson 2000).

⁹⁴ The ability to move across international borders depends on national migration policies, which in turn depend on a specific national policy regime. Migration policy regimes have not been immutable, and their present-day "cumbersomeness" is a very recent construct. Indeed, the transformation from a "free-entry" regime to one of control and regulation was triggered by the development and introduction of the concept of "citizenship" and its official and legal recognition. The concept of citizenship has been followed by an increasingly complex and heterogeneous regulatory and normative evolution of national migration policies (Klugman, Pereira 2009).

⁹⁵ In the case of emigration policies, for excess of workers which were difficult to absorb into their domestic productive fabric.

production cycle that had required their presence abroad. Moreover, the characteristics of the "guest worker" archetype were being male, young and thus eager to return to their country of origin (Brody 2002). However, when the "temporariness" came to an end due to the economic crises that started in the seventies, migrants started to not return to their home countries. This structural mutation radically transformed national labour programmes (Munz, Ulrich 1997). Migratory models transformed from a system composed of temporary guest workers to a new one where migrants could settle for a longer time (or even permanently)⁹⁶ while trying to reunify their families⁹⁶ in the new country (Munz, Ulrich 1997). During this new phase, women began to numerically increase as labour migrants, but at the same time the harshness of migration policies and entry restrictions increased proportionally.

Tighter border controls have also led to an increase in the number of irregular migrants. This dynamic, which particularly occurred in Europe after the economic and structural variation described above, has seen the increase of restrictive entrance policies (Sassen 1991; Sassen 1993). Although there are no reliable data due to the uncertain aspect that characterises undocumented migration, there seems to be an empirical correlation between rigid migration policies and increased rates of illegal transnational migrations (Sassen 1991; Sassen 1993).⁹⁷

In this thesis, migrant workers are the independent variable, while Italian and Japanese labour markets, their socio-economic institutions, and domestic migration policies are the dependent variables of analysis. The overarching theme is aimed at understanding whether these two countries, particularly Japan, despite belonging to different types of political economy coordination, tend to converge in migrant-related economic policies towards liberal systems. Besides, whether Japan tends to become more similar to the Mediterranean systems of mixed market economy, especially like the Italian one, due to similar structural dynamics. The presence (or not) of migrant workers is the deciding factor for this transformation that could indicate alternative political economy paths, as well as necessary solutions to cope with the globalisation pressure. Migrant workers could also be seen as a dependent variable since their current presence in the Italian labour market and partial absence in the Japanese one is determined by the specific social, political and economic configurations of the two countries. However, for the partial purpose of this thesis, i.e. the investigation of the possibility of systemic convergence, it will be maintained as an independent analytic variable.

⁹⁶ In the words of Rogers (1985), temporary migrants had "come to stay" (Rogers 1985, in Brody 2002: 17).

⁹⁷ In the case of migration of illegal and undocumented workers, it is generally the labour brokers (often crime-related) who replace the state and its labour policies as a mediator with the entry into the country and the joining of its labour market (Weiner 1995; Brody 2002: 17).

2.2.1. Migrant workers in Italy and Japan: a comparison

Migrant workers are a structural part of the Italian productive system, notably since the 1990s (Fellini, Fullin 2018: 294). As for Japan, although migrant labourers are apparently not structurally significant, over the last 30 years the Japanese government attempted several times to add them into its national labour market, each time with different politico-cultural causal spurs and ethnic-social filters (Hamaguchi 2019a). Even though Japan is neither a classic foreign worker destination country nor is immigration in the "national autobiography" (Liu-Farrer 2020: 16), the demands of the economy and the labour market have given transformative inputs to the rigid domestic migration policies.

As discussed in Chapter I, the different institutional configurations, such as the degree of direct state intervention, the presence and role of trade unions, the type of welfare system and the scale and nature of labour market regulation, are crucial in determining the efficiency of the labour market (Gallie 2007; Fellini, Fullin 2018: 296). This also affects the type and quality of employment, as well as the net demand for workers. At the same time, the direct and indirect need for a migrant labour force derives from these specific combinations of socio-economic institutional configurations (Devitt 2011; Afonso, Devitt 2016; Fellini, Fullin 2018). In short, the variation of socio-economic regimes is fundamental in determining the type of labour migration in a specific country (Devitt 2011).

Italy's case, as a Southern-Mediterranean regime, presents a lower innovation capacity and a stronger demand for low-skilled, flexible⁹⁸ and manual workers.⁹⁹ This system requires the migrant workforce's contribution, especially in low productivity and low added value economic sectors. Such demand is linked to the gradual process of substitution of native workers (Fellini, Fullin 2018:

⁹⁸ The structural reforms of the labour market that began in the 1990s were intended to hit the lowest and weakest segment of the dualised system of the Italian labour market, which includes the largest presence of migrant workers. The plan of increasing labour flexibility was designed to occur without severely affecting the upper labour market segment related to core regular workers (Checchi 2013: 153). Some of these reforms were: the reform in 1992 of the wage bargaining system with the cancellation of the indexation clause in force since 1951 (sliding scale, in Italian "*scala mobile*"), in 1993 the agreement on the social pact between the government, trade unions and Confindustria to freeze wages for one and a half years, in 1997 the partial liberalisation of entry wages at first hiring and the introduction of temporary work agencies, and then a steady increase of the liberalisation process of different types of employment contracts (Checchi 2013: 153-154), still continuing decades later (and starting to affect both segments of the labour market). The "*scala mobile*" was an economic mechanism that adjusts wages to inflation. It was aimed at automatically indexing wages according to increases in the prices of certain goods, in order to counteract the decrease in purchasing power due to the increase in the cost of living, as measured by a special consumer price index. In Italy it was abolished during the Amato government as it was considered a cause of inflation (Watanabe 2014: 57).

⁹⁹ Compared to other regimes in the VoC classification system.

296). In this respect, the Southern statist regimes are similar to the liberal ones, since both configurations have economic sectors with a high number of low-wage and low-skilled workers (Devitt 2011).

The above inference takes into account several international labour migration theories¹⁰⁰ that recognise different degrees of interaction between the supply side, generally migrant workers, and the demand side, employers or the state (Fellini *et al.* 2007; Devitt 2011: 583). From the demand side's point of view, Piore's explanations (1979) are still valid. He presents three possible complementary explanations: the "conventional" hypothesis, the social status maintenance hypothesis, and the "dual-labour market" hypothesis (Piore 1979, in Devitt 2011: 583-585).

The first one, the "conventional" hypothesis, is a well-known theory in which, due to the economic expansion of the market and the shift of native workers towards higher levels of salaries in the upper labour market strata, migrant workers "respond" to this need as labour substitutes. In short, they compensate for the labour shortage in the lower productive sectors.¹⁰¹

The second hypothesis is entirely related to the process of accumulation and preservation of the social status of native workers, which is not related to personal incomes. To remain in the socially better-recognised part of the employment hierarchy, low-skilled migrant workers with low social demands are employed as their substitutes.

The third hypothesis concerns, as explained in the first chapter, the creation of two different segments within the national labour market. These primary and secondary levels are known as "dualised" or "segmented" labour market layers. These visible division barriers place in the upper segment native workers (better-paid, higher-skilled labourers) and the lower segment migrant workers (low-paid and generally low-skilled labourers). The labour market itself, according to Piore, "sustains" this stratification and dualisation mechanism to the needs of "filling" the lower segment of the market, which was previously abandoned by native workers (Piore 1979, in Devitt 2011: 583-585).

Several authors explain the apparent paradox of the Southern-Mediterranean countries' strong demand for migrant workers with the concomitant presence of a high unemployment rate (Pugliese 2002; Watts 2002, in Devitt 2011: 584-585): following the hypothesis of Piore's dualisation, native workers gradually fill in the highest economic and social recognised strata of the

¹⁰⁰ The main purpose of these theories is to explain how international migratory movements originate and to justify their persistence over time (Massey *et al.* 1998, in Devitt 2011: 583).

¹⁰¹ Boeri added that to assess the role of labour shortage, it is important to evaluate the variables of economic growth, economic expansion and employment creation (Boeri 2006, in Devitt 2011: 584), although this conflicts in situations such as the Italian (and German) case, where there is already a large pool of underutilised low-skilled native workers (Boll rot 2002, in Devitt 2011: 584).

labour market. In parallel, with an overall decrease in migratory movements within states¹⁰² and a generalised increase in wages thanks to trade union intervention during the 1960s, production units were decentralised and then transformed into smaller ones, less unionised and with greater flexibility. In the meantime, educational, professional-vocational training mechanisms and concurrent entry into the labour market began to change, the former becoming longer and more time-consuming. The result was a delay in young workers' entry into the labour market. These smaller production units were economically and socially less attractive for the native workforce and destined to be appealing only to the "less exigent" migrant workers (Devitt 2011: 584-585).

Japan, similarly, experienced a slow process of market dualisation, but because of different kinds of political choices. Japan has experienced the same paradoxes in a less cogent way. Moreover, it has never "suffered" from high unemployment rates typical of the Southern-Mediterranean regimes. Structural economic growth's problems had different solutions also because of very different governmental migration policies (Watanabe 1990). An important diversity between the two countries is in the pull factors: the presence and size of low-wage and low-skill economic sectors. In Italy, they are decidedly more and larger than in Japan. This is determined by characteristics such as the notable presence of the informal labour market, a weak and underdeveloped compulsory educational/professional training system managed by the state, wide importance of the agriculture sector, a relatively weak system of trade union regulation and a substantially uninfluential industrial relation bargaining system.

Japan, similarly to a mixture of liberal and conservative regimes, presents a hybrid of pull factors. First of all, its national vocational training, despite being a generalist one like in the Southern-Mediterranean and liberal systems, has a unique and peculiar developing structure within companies. It starts after the active worker enters into the labour market, which has lower technical entry barriers than other labour systems. Despite the lack of active policies (as in Southern-Mediterranean regimes) and the meagre welfare system, unemployment is generally at very low levels and the welfare system's support is less necessary (Watanabe 1990). Japanese trade union structure, almost dominated by an enterprise-based system, does not help to make an easy comparison between the different models; although, due to its peculiarity, in the migrant workers matter it results similar in performance to the weak trade union systems of the Southern-Mediterranean regimes. The informal labour market, although existing and substantive, does not reach the Italian quantitative and qualitative importance. On the contrary, the composition of the productive industrial fabric is similar, with the prevalence of low innovative small and medium-

¹⁰² Internal migration from the rural countryside to the industrialised and economically developed cities.

sized firms, which are potentially a strong pull factor for the integration of low-wage and low-skills migrant workers.

This fragmentation of the productive fabric (together with the vast presence of an irregular flourishing economy) is indeed commonly the main factor of attraction and demand for migrant workers, as it turns out to be particularly in the Italian case (Reyneri 2003, in Fellini, Fullin 2018: 300-301).

The gradual transformation of economically developed countries from industrial-manufacturing societies into service-based ones¹⁰³ has exasperated these processes, as the low-wage and low-skills sectors have greatly expanded. Liberalisation and market deregulation have increased the demand for highly mobile and flexible workers (Watanabe 1990). A large number of low-wage and low-skilled sectors attract low-skilled workers, while at the same time it is increasingly difficult to attract native workers (Devitt 2011). This dynamic is particularly depictive of the service sector.

Italy, already set in this process of expanding its labour's base towards migrant workers, had a larger pool to draw from. Japan, on the other hand, has had to deal with these mechanisms at various times since the post-war period, with alternating results. Both countries, particularly Japan, have *de facto* attempted to promote attractive policies aimed at skilled foreign workers (similar to what happens, for example, in the Nordic countries). In Japan, as in Northern Europe, there is indeed a very low unemployment rate. However, their number is quantitatively insignificant compared to both the demand for a low-cost, low-skilled, flexible workforce and the actual numbers of skilled migrant workers who have settled in Japan (Ministry of Justice of Japan 2020).

As introduced above, the level of unemployment is another determining factor for labour migration flows. In Italy the rate is high, so it should be a disincentive for foreign workers to migrate. In Japan it is low, therefore an incentive to transnational labour flows. However, other factors are in open conflict with this logic, as indirect effects caused by various institution configurations such as the type of welfare regime, the type of national education, the type of training regime and the presence (and quality) of social services. Their combination creates barriers (or incentives) to the participation in the labour market of the "main substitutes" of migrant workers (Piore 1979, in Devitt 2011: 589-590). These alternatives are women (mainly housewives/mothers), young people, agricultural workers (Piore 1979: 87) and the elderly. Their presence in the national labour market is inversely proportional to the demand for foreign labour force. Italy, and more broadly Mediterranean countries, have low employment rates and low working participation of these social categories, corresponding to high demand for the migrant labour force.

¹⁰³ Quoting Wren (2013), "*in contemporary affluent societies, the service sector is the main employment driver*" (Wren 2013, in Fellini, Fullin 2018: 297).

There is often a relation between meagre welfare systems towards child-care services and mothers (as in Italy and Japan) and low participation of women in the labour market (Cournède 2006, in Devitt 2011: 589-590). On the topic of welfare service, Devitt argues that the lack and weakness of active-labour market policies (ALMPs) are also an important variable for the employment rate. Mediterranean countries are associated with underdeveloped ALMPs systems and more closely linked to passive services to support periods of unemployment, thus creating a disincentive to constant active participation in the labour market. These welfare systems, ultimately, discourage the presence of "main substitutes" in the labour market, increasing the demand for migrant workers (Devitt 2011: 590).

This factor is generally true for Italy (and the other Southern-statist regimes), but not exactly accurate for Japan. In the Japanese case, it does not depend on the demand for a "substitute" labour force but on the effective attempt to employ the substitutes through *ad hoc* labour policies.¹⁰⁴ Japan is adopting policies of internal labour supply mobilisation,¹⁰⁵ instead of resorting explicitly and massively to the contribution of migrant workers.

As mentioned beforehand, the role of education and the type of training regime are crucial in the demand for the foreign labour force. Crouch *et al.* (1999) highlight how a low degree of coordination between the state, education, training/vocational system and employers leads to difficulties for native workers to meet specific skill requirements. Consequently, these skills must be sought elsewhere. Mediterranean countries are this kind of example, in particular Italy. Japan, on the other hand, despite a low level of coordination between the state, employers and the generalist compulsory education system, compensates for this need through a peculiar training process within firms, thus avoiding the need to obtain these skill sets from an external workforce (Crouch *et al.* 1999, in Devitt 2011: 590-591).

The last point of comparative analysis, the quality and extensiveness of social services (employment-standard arrangements within a sector, the extent of child-/elder-care provisions, but also health and social services, education, public administration and community assistance), can create demand for migrant labour, too (Devitt 2011: 591). In this case, social services (and an ageing population) are an indirect attraction determinant for care providers, especially at a time when the sector is particularly unattractive to native workers due to low quality of working conditions and low wages. This pulls foreign workers who are more likely to "adapt" to these less favourable working conditions.

¹⁰⁴ Together with alternative labour force activation/involvement policies.

¹⁰⁵ Like in the the recent Abenomics economic policies.

The Italian case has shown that this situation, together with a lower quality (and length) of child-/health-care provisions, could be a strong magnet for foreign care "specialists". Japan, on the other hand, despite possessing structural dynamics similar to Italy concerning population ageing and low birth rates, has placed extremely restrictive entry barriers¹⁰⁶ and undermines this strong demand for the healthcare workforce. Japan presents the same Italian problems related to the lack of attractiveness of care sectors, as well as a system of child care that is not inclusive of the needs of mothers' working careers (together with an increase in female employment and low male participation in domestic work). However, the presence of strict entry barriers has placed different and more severe pressure on the political and economic management of the problem.

The VoC perspective relates to the labour market regulation field comprehensively. Both countries are strongly regulated. Both have a distinct dualised labour market and their tripartite relations are weak and underdeveloped in favour of the steady decision-making power of the central government. This aspect is directly linked to the production structure of the two countries. A productive system characterised by small and medium-sized companies needs greater contractual flexibility and, consequently, less trade union protection. Italy presents a diversity of protection and regulation based on the size of the firm. It also has a generally lower level of monitoring of labour and employment standards.¹⁰⁷ Japan, due to the peculiar nature of its union system, has a lower union presence in smaller companies. This leads to the greater interest of small-sized firms in employing less costly workers, while flexible in terms of working hours and geographical movements (Pugliese 2002, in Devitt 2011: 588). This logic is closer to Italy than Japan, mainly due to radically different migration policy choices.

The following section analyses the correlation between welfare state configuration, female labour participation and labour migration policies.

2.2.2. Welfare state regime, female labour participation and labour migration

Both Italy and Japan have a meagre, corporatist and familialist-type welfare system. In the Italian case, it is a typical Southern-Mediterranean welfare regime (Uzuhashi 2003; Estévez-Abe, Naldini 2016; Migliavacca, Naldini 2018a; 2018b). The Japanese welfare system, instead, is considered to

¹⁰⁶ For example with Japan's Economic Partnership Agreement (EPA) programme.

¹⁰⁷ Also in this case it is preferred by many migrant workers who have both lower expectations and greater "saleability" in the labour market, especially in the case of irregular workers. In the Southern-Mediterranean regimes, this leads to a generalised lowering of workers' standards, which is often aligned with very strict and rigid regulatory systems characterised by a high level of taxation and/or compulsory social contributions (Devitt 2011: 588-589).

be a small-scale, productivist welfare state, relying on the principles of shared growth and secure employment as its main functional equivalents (Chiavacci, Lechevalier 2017). Besides, the Japanese case is about a system focussed on gender roles and social community share dynamics. The "revolution"¹⁰⁸ occurred in female participation increase in the labour market, together with dynamics such as a longer life expectancy (especially of women), the decrease in net birth rate and the presence of new family role models (Migliavacca, Naldini 2018a: 2), are to be analysed in the light of each welfare system's peculiarity. The welfare regime, the abovementioned social transformative dynamics and the labour market together influence labour migration flow patterns.

Originally, both Italian and Japanese welfare systems have often been associated with the European Continental model, the conservative-corporatist one (Esping-Andersen 1990; 1998), though recently they have been considered within the peculiar Ferrera's familialist model (1996). This new typology is based on two axes of de-commodification¹⁰⁹ and de-familialisation¹¹⁰ (Shinkawa 2013: 171). Both systems have the same characteristics: a strong imprint of the male breadwinner model, limited presence of policies supporting the stable presence of women in the labour market (and their return to it upon childcare activities), weak childcare policies (parental leave entitlements and maternity leaves), narrow social services and care services, high pension expenditures that undermine other welfare services, preference towards cash transfers instead of direct services/active policies¹¹¹ and, above all, a central role of the family, especially of women's duty in the care of children and the elderly (Estévez-Abe, Naldini 2016; Saraceno 2016, in Migliavacca, Naldini 2018a: 12).¹¹² Both Italy and Japan have experienced various (and continuous) phases of welfare state retrenchment since the 1990s, and thus a progressive move towards the

¹⁰⁸ Or "incomplete/unfinished revolution", according to scholars such as Esping-Andersen (2009) and Gerson (2010), as the changes in the female employment rate is limited by the correspondingly low male participation in domestic work, by the social limitations involved in this revolution (especially in social groups belonging to the higher and better educated strata) and by the generalised difficulty of the organisational models of the labour market and of the various institutions to modify their assets in response to this change (Migliavacca, Naldini 2018a: 2).

¹⁰⁹ De-commodification can be described as the strength of social rights and the degree to which citizens are immunised from market dependence (Janoski *et al.* 2005). At the same time, it can be seen as a political response to commodification processes, i.e., from (capitalist) economic processes in which workers (and their labour capabilities) are exchanged as a commodity in the labour market (Shinkawa 2013: 173).

¹¹⁰ The process of de-familialisation is explained as "policies that lessen individuals' reliance on the family; that maximise individuals' command of economic resources independently of familial or conjugal reciprocities" (Esping-Andersen 1999: 45). This description can be summarised as a change in traditional social models (e.g., the male-breadwinner model) in favour of a more economically independent role for women and new family model configurations (Shinkawa 2013: 174).

¹¹¹ The lack of direct and active services corresponding to the choice to rely on monetary transfers to households is another indirect factor to labour demand for migrant workers (Da Roit *et al.* 2013, in Fellini, Fullin 2018: 300-301).

¹¹² Despite very generous welfare expenditure and welfare provisions in general (Migliavacca, Naldini 2018a: 12).

liberal model (or hybrid forms)¹¹³ (Scruggs, Allan 2006: 67).¹¹⁴ Japanese and Italian welfare regimes also show low levels of de-commodification and de-familialisation (Shinkawa 2013: 171).

		De-commodification	
		high	low
De-familialization	high	social democracy	liberalism
	low	conservatism	familialism

Figure 2.2. Welfare regimes classification based on de-commodification and de-familialisation (Shinkawa 2013: 175).

As highlighted by Migliavacca and Naldini, Italy and Japan have very low general standards as regards female participation in the labour market. Both countries are at a disadvantage in gender equality policies compared to other OECD countries. These two dimensions are intertwined with the fertility rate variable and the type of welfare regime in order to describe the reasons why a country has certain characteristics in employment patterns (Migliavacca, Naldini 2018a: 2). Consequently, all these elements combined determine the presence of peripheral actors in the labour market and describe the reasons for the existence of such a large number of foreign labourers in the market: they are the women and the elderly's natural market substitute.

¹¹³ It is extremely difficult to perfectly identify theoretically a welfare regime in a regime type, and potentially all welfare regimes can be categorised as hybrids (Bonoli, Shinkawa 2005; Shinkawa 2005).

¹¹⁴ For example, the Japanese labour market participation policies of the 1990s (and 2000s) to encourage women's participation occurred at a time of strong labour market deregulation. The consequence of the increase in equal opportunity laws was a greater participation of women in the labour market, but due to the context of strong deregulation they ended up in the marginal labour pool with almost exclusively part-time and non-regular contracts. Women's new presence in the labour market has emerged as yet another process of distancing the segments of the Japanese labour market already in progressive dualisation, in a gradual process of economic neoliberalisation. At the same time, there has not been an equal improvement of welfare system social services, putting the social cost onto the shoulders of women (Shinkawa 2013: 172).

In Mediterranean countries, and particularly in Italy, the weakness of personal and social service systems has led to the outsourcing of most services. State cash transfers are usually re-invested in the employment of "specialised" personal care workers (mostly of foreign origin). It is no coincidence that in Italy (and Spain) there is a large disproportion in the number of foreign workers employed in the personal service sector, whereas a considerable number is still employed in "classical" production sectors such as manufacturing, agriculture and construction (Fellini, Fullin 2018: 303-312). Specifically, Italian households prefer to use cash transfers to hire workers for care and domestic activities (e.g. cleaning, babysitting, elderly care, gardening, etc.), in place of public provision services (Da Roit *et al.* 2015, in Fellini, Fullin 2018: 308).

This disproportion is greater if considering undocumented and irregular workers. Ambrosini (2015) defines this alternative system as "hidden and invisible welfare". Foreign care workers tend to accept relatively lower wages and longer working hours. Often, they have to live in the same house as the assisted persons (the so-called "households-as-an-employer" system) (Ambrosini 2015, in Fellini, Fullin 2018: 309).¹¹⁵

The unexpected similarities between Italian and Japanese welfare regimes derive from common principles. Such similarities are somewhat "unexpected". The Italian case, as described earlier in chapter I, falls within the Southern European-Mediterranean classification and is characterised mainly by the central role of the family ("strong Mediterranean family" model) (Migliavacca 2008; Migliavacca, Naldini 2018a; 2018b). It originates from the distinct social and political influence of the Catholic Church (Naldini 2006). The Japanese one presents a rooted gender imbalance (Estévez-Abe, Naldini 2016, in Migliavacca, Naldini 2018: 5), determined in turn by the presence of Buddhist religious institutions and by various aspects of Confucian social paradigms, too (Hashimoto 1992; Esping-Andersen 1998, in Migliavacca, Naldini 2018a: 5). "Unexpectedly", the two systems have a religious root pattern that links them together.

Since 2000, there has been a significant increase in the participation rate of women in the labour market of both countries,¹¹⁶ although such a rate is still lower than many other OECD countries (Migliavacca, Naldini 2018a: 7). This change has had a heavy impact on these family-

¹¹⁵ This system contrasts with the Nordic and Continental European welfare models, as the service is offered by the state through various public institutions (and private institutions for liberal welfare models like in the UK), which often employ indigenous workers (Fellini, Fullin, 2018: 309). In these models, the welfare services themselves require higher qualifications, exposed by higher entry barriers. In fact, credentials are also required when they take place within households. This is not the case for Mediterranean countries (Simonazzi 2009, in Fellini, Fullin 2018: 310). This differentiation leads to a higher presence of migrant workers with a lower level of schooling in Southern European countries, together with a generally lower level of education of the native population, for example with the rest of the countries of the different European clusters (Fullin, Reyneri 2011, in Fellini, Fullin 2018: 312).

¹¹⁶ In particular in the service sector, a sector that has seen the highest growth rate in recent decades (Migliavacca, Naldini 2018a: 6-7).

centred welfare systems. In fact, despite the still low female participation rate, such a rise in the number of women in the labour market has undermined the foundations of a care and assistance structure focussed on women's domestic work and family care. Adequate child care policies of the state can help solve this problem, notably in the Japanese context, where women traditionally do not re-enter the labour market after childbirth (or to a very limited extent as part-time workers). This cultural behaviour, moreover, is deepened by persistent social gender differences.¹¹⁷

Welfare systems are determined by cultural models, too. The role of women in the labour market (and to a lesser extent that of the elderly) is heavily entrenched in cultural concepts that root a country's social and cultural foundations. In the case of Italy and Japan, these differences are part of their social and cultural fabric and are in turn socially and culturally "internalised" by women. The welfare system, consecutively, is shaped around these cultural needs.

As described so far, in the Italian case the difficulties of women in entering and remaining in the labour market are a distinctive and perpetual feature of the socio-economic system, thus forcing the search for the labour force outside its domestic borders. Although the premise is the same for Japan, the migrant workers' numbers are much lower and the barriers to entry and staying are much more complex.

2.2.3. Varieties of capitalism and migratory phenomena

An area that is still underdeveloped in the research arena is the one that links varieties of capitalism studies to the interactions with migratory phenomena, both demand and supply side. Specifically, more consideration is usually given to the supply side, i.e. the set of determinants related to the motivations that drive people to migrate, while less attention is given to the demand side, i.e. the explanations behind the different presence and demand by countries for foreign workers (Devitt 2011: 579). Instead, labour migration and socio-economic regime variations are linked in the stabilisation and determination of economic migration flows (Devitt 2011: 580).

In the original VoC studies, the focus has been on the enterprise and its characteristics. Immigration, on the other hand, has been a marginal element of it at best. The same can be said in comparative studies of political economy. However, the VoC literature does not rely solely on firms, but also on policies and agreements between parties, sustaining the creation of political and

¹¹⁷ For example, in the so-called "glass ceiling" present in the possibilities of women reaching important professional positions (Migliavacca, Naldini 2018a: 8).

economic alliances, often of a clientelist nature. Incentives to innovation are, in turn, linked to institutional configurations that are considered functional and "winners".

In the Italian and Japanese cases, the type of immigration and migratory processes are complementary to their socio-economic systems. It is therefore important to understand whether the regulation of economic migration in the two countries creates complementarity or, otherwise, causes short circuits. In the latter case, it is necessary to identify whether forms of non-complementarity have developed between institutions that apparently and concretely do not "work".

One hypothesis is that the persistence of tensions on this issue risks creating an overabundance of loud policy movements (similar to the case of the Syrians during the Merkel government in Germany). Here, as in the incipit above, the concept of coalitions and alliances that are formed in the interaction between institutions, the market and migration flows is crucial.

In the following sections, the general dynamics that regulate the types of migratory flows and migration policies based on the different institutional configurations and the interaction between the actors of domestic industrial relations will be presented. The first section will be on the current state-of-the-art regarding this topic, while the following sections will more closely explore the cases of Italy and Japan.

2.3. How the different institutional configurations and industrial relations actors determine types of migratory flows and migration policies

Different socio-economic configurations in the VoC perspective present different migratory push-pull factors. While migration flows can determine the internal socio-economic dynamics of a country, such as labour market, economic policies and political campaign manifestos, the national socio-economic institutions and their different configurations¹¹⁸ determine a country's migration policies. Such migration policies regulate the degree of immigration control, the country's labour market choices, and labour-related or production-related needs of business (Freeman 2004: 953-958; Devitt 2011; Afonso, Devitt 2016: 601-606). State, trade unions and employers' associations are as relevant in shaping migration policies like the national socio-economic configuration.

Different socio-economic configurations correspond to distinct types of migration flows. Devitt (2011) showed that before the 2008 economic crisis, countries which belonged to the Nordic

¹¹⁸ The institutional configuration that determines the specific characteristics of a labour market is more decisive than simple market parameters (unemployment, wage differentials and economic growth) (Ruhs, Anderson 2010; Devitt 2011; Afonso, Devitt 2016: 601).

model, specifically Sweden, received fewer migrant workers than liberal model countries. This process ran counterintuitively to the well-known structural characteristics of the Nordic labour market (higher wages, higher social security, etc.). In Continental countries like Germany, and even more in liberal ones like the UK and in Southern-Mediterranean ones like Italy, which are characterised by lower wages, low-skill sectors and less social security than those belonging to the Nordic model, the demand for migrant workers was much higher. This is due to specific labour market characteristics that determine distinct labour needs. In particular, the Nordic model attracts more high-skilled workers, while the Southern-Mediterranean archetype appeals to more low-skilled workers to be flexibly employed in low-wage sectors. Even though Nordic countries' welfare systems are among the most generous ones (Devitt 2011), they create higher general taxation compared to Mediterranean countries, which results in a negative stimulus towards migrant workers' pull incentives (Afonso, Devitt 2016: 601-602).¹¹⁹

In this perspective, the first differentiation category in migration policies is between CME and LME systems. CMEs are marked by centralised and regulated forms of coordination between the various economic institutions. This kind of configuration is generally less oriented towards the entry of foreign workers than LMEs. CME markets are ideally inclined to safeguard the wages and safety levels of workers already present within that particular labour market. CMEs are associated with incremental innovation, which does not facilitate the arrival of new skill-bearers from outside the country. However, from an antithetical point of view, migrant workers can fill the gaps left by the CMEs' peculiar skill-training system which is more oriented towards the development of incremental skills. LMEs, instead, are related to production systems characterised by radical innovation, where the skills acquisition comes directly from the labour force present in the market. LMEs establish more specific entry filters based on the technical/skill characteristics of the desired workers, built upon the previous search on specific skill holders and labour market analysis.¹²⁰

¹¹⁹ This concept is often openly contrasted by the general idea that a more generous welfare system leads to stronger incentives for immigration into that country. According to research conducted in sixteen countries between 1985 and 2002, Schulzek (2012) has shown that larger welfare regimes attract asylum seekers more than migrant workers. This is the case with Nordic welfare systems. In liberal regimes, neither category is incentivised to migrate, while in continental regimes both are attracted (however, it was not possible to use the analysis variable of the different types of migration policy) (Schulzek 2012, in Afonso, Devitt 2016: 602). On the other hand, Van Hooren (2012) found that in cases of very weak welfare regimes, such as the Italian one, migrant workers can act as a functional substitute (as private service providers) to the deficiencies of the public welfare system. In this case the meagre welfare serves as an important pull factor. In fact, migrant workers are both welfare recipients and welfare providers, as in the case of female migrant workers in the Italian care sector (often in an informal way) (Van Hooren 2012, in Afonso, Devitt 2016: 602).

¹²⁰ Peters (2015) theorised that, with regard to the relationship between migration and trade policy, there is a correlation that consists in the fact that the more open trade policies adopted the greater the restrictions on migration policies (and vice versa), in a substitution relationship. The explanation is that if there are difficulties related to the import of cheaper goods due to trade restrictions, the business world will put pressure on the government to allow more low-cost, low-skilled migrant workers to enter the country. Conversely, in a situation of greater trade liberalisation and less rigid

The first group among the tripartite national actors, usually more inclined for an easing of migration policies, are national employers' associations. According to Caviedes (2010), it subtends greater differences between the different productive sectors within a country than between different countries' labour market sectors. The determinant variables for an employer's preferences within a productive sector are the possibility of increasing the temporal flexibility of labour, the number of workers to be employed and their wage levels.¹²¹ In reality, there is a distinction between employers' associations that safeguard large firms (such as Confindustria in Italy and Keidanren in Japan) and associations that support small and medium-sized enterprises (such as the Chambers of Commerce). Generally, the latter has a more favourable stance to the entry of migrant workers to keep production costs low, while the former tend to create cross-class coalition dynamics with the most important trade unions. In this case, the choice usually depends on the peculiar structure of the national productive fabric (Interview with Keidanren 2020).

The level of unionisation and the general power of unions is inversely proportional to the restrictiveness of the national migration policies.¹²² The stronger the unions, the greater the restrictions. Unions tend to defend their core members and representatives, who are generally traditional workers employed in the manufacturing sector (male and "white", at least for Western standards). This protection is of a political and economic nature, as an increase in the entry number of low-cost and low-skill migrants into the country's labour market could lead to a lowering of natives' general wage rates and worsening working conditions (Watts 2002). Moreover, organising migrant workers may be quite complex due to the temporary nature of their legal status (Krings 2010). It may also be that, instead, trade unions are open to the presence of more migrant workers as the improvement of employment standards is more effective in this way than regulating the labour market through adjustments of migration policies (Watts 2002: 73). This could potentially counter the informal labour market which, due to highly restrictive migration policies, tends to expand.

customs taxes, there will be less necessity (and internal pressure) for the arrival of low-cost, low-skilled migrant workers (Peters 2015, in Afonso, Devitt 2016: 603).

¹²¹ For example, low-productivity sectors such as agriculture and services see pressure on the segmentation of the labour force and the status of migrant workers compared to indigenous workers. This is due to the fact that maintaining policies that differentiate status helps keep wages down (Caviedes 2010). The same is true for all those labour-intensive sectors with low added-value production.

¹²² In these cases, trade unions seek other ways to solve the problems and needs of the market. For example, in the Swedish case, an approach was chosen in the 1960s to facilitate the entry into the labour market and the employment of women (Bucken-Knapp 2009). In the case of numerically weaker trade unions with less political influence, such as the British trade unions, there was a greater propensity for the entry of migrant workers and a more general loosening of entry policies. In fact, British trade unions have been more interested in organising migrant workers rather than regulating entry into the country for work purposes (Haus 2002).

The concluding player is the state, which is composed of a national government, different institutions and various political parties. Within industrial relations and labour market dynamics, it seems to be the one with the lowest interest involved in these topics. However, in its ideological and political divisions, the different components act to the extent necessary to channel public opinion into votes, thus moulding their electoral campaigns.¹²³ The main tensions are the electoral pressure and the strain created by interest groups. Electoral pressures come from public opinion and are about migration policies and migrants. If the voters of a given political party are mostly high-skilled workers, this specific party will consequently be in favour of restrictive measures on migration policies. This is due to labour market competition dynamics (Cerna 2009: 149). However, this is not quite accurate. There is rarely a real opposition to the entry of high-skilled migrant workers, as they are seen as an element of complementarity rather than competition (Hainmueller, Hiscox 2010).

The influence of interest groups, such as the role of public opinion, can be decisive in creating pressure on governments to open their policies to the entry of migrant workers. The type of political institutions and electoral systems might also influence migration policies. In fact, in multiparty and corporatist electoral systems there is a general propensity to ease electoral pressures for migration policy restrictions, while in majority electoral systems the tendency is to advance harsher and more restrictive migration policies (Breunig, Luedtke 2008, in Afonso, Devitt 2016: 605-606).¹²⁴

2.4. Migration in both the Italian and Japanese contexts: an overview

2.4.1. The Italian case: structural and institutional factors

Italy, more than any other European country (including the other Southern European cluster countries), has specific pull-push factors towards migrant workers. These characteristics became more evident during the 2008 global economic crisis. From 1995 to 2015, Italy, compared to other Western European countries, underwent a strong process of "asymmetrical polarization" (OECD

¹²³ The reference is to the conceptual and ideological division between centre-right and centre-left political parties. In particular, during periods of political competition, the different political parties take a peculiar stance on the subject. Far-right parties often base much of their election campaign on security issues related to immigration, even in contradiction of the possible productive needs of employers (Schain 2006).

¹²⁴ In this case the restrictive migration policies are determined by a stronger link between the preferences of the median voter and the above-mentioned policies (Devitt 2012, in Afonso, Devitt 2016: 605).

2017b, in Fellini, Fullin 2018: 312), in which it presented an unusual growth of the lower (secondary) strata of labour market segmentation.¹²⁵ Even if a general process of polarisation has been common in most OECD countries, Italy has also had a growth of both high and low labour market segments (as has broadly happened in other economic-productive systems), but with a clear disproportion towards the growth of jobs belonging to the lower level's segmentation. The most surprising factor, in addition to the unusual disproportionate growth of low-skilled jobs compared to high-skilled ones,¹²⁶ is that this was evident during the period of economic crisis. On the other hand, low-skilled job growth contributed to the sharp decrease in the proportion of middle-skilled jobs (Fellini, Fullin 2018: 312).

For four years of this prolonged economic crisis (2012-2015), Italy showed a "reverse polarization" pattern, contrary to the usual polarisation process that involves a higher growth of high-skilled jobs compared to the growth of low-skilled jobs.¹²⁷ This reverse polarisation has seen labour migrants playing a greater role in the economic market with respect to native workers, fuelling a process of replacement mostly done by women. In fact, during the crisis, there has been a job loss process that has involved more low-skilled workers in the industry and construction sectors, while numerous positions were opened in the service sectors, especially in personal care, which attracted mostly foreign women (Fellini, Fullin 2018: 312-321).¹²⁸

The lack of national welfare responses to structural problems has led to a greater demand for workers to be employed in the personal-care sector known as "households-as-an-employer", which in 2008-2010 involved more than a half of the total increase in the number of workers from the entire low-skilled working pool (Fellini, Fullin 2018: 312-321).

The high demand for low-skilled migrant workers derives from several well-defined structural factors in the Italian socio-economic dynamic. First, the national productive system sees the prevalence of medium, small and very small (family-run) companies. In these cases, migrant workers are the most convenient employable unskilled labour resource, because of their flexibility and mobility characteristics. Moreover, the low level of productive and technological innovation of the Italian production system avoids the need for having a great number of high-skilled workers and

¹²⁵ The only other exception was Greece (Fellini, Fullin 2018: 312).

¹²⁶ According to the International Standard Classification of Occupations (ISCO-88). Highly specialised jobs are divided into three macro-groups (legislators/senior officials/executives, professionals, technicians/associated professionals), medium-specialised jobs are divided into three macro-groups (clerks, craftsmen and similar, plant and machine operators and assemblers), while low-specialised jobs are divided into two macro-groups (service workers and sales workers in shops and markets, elementary occupations). Professions in agriculture, mining and fishing industries are not included (Elias 1997; OECD 2017b, in Fellini, Fullin 2018: 312).

¹²⁷ The growth in the number of migrant workers in low-skilled jobs has doubled since 2005 (Fellini, Fullin 2018: 321).

¹²⁸ This replacement process has been stronger for foreign women than for foreign men, who were already in the labour sectors hit hardest during the crisis.

in turn stimulates the demand for a large presence of low-skilled workers. In turn, the vast structural presence of a large pool of low-skilled reserve workers (migrants and natives), perpetuates this system by not stimulating technological and innovative investments in production processes. Generally, Italian production is characterised by a labour-intensive workforce and low value-added production systems.

The low level of Italian labour regulation also contributes to the formation of a greater labour market polarisation, creating a distinctive division in regular and irregular economic sectors. The latter, by its very nature, attracts irregular and undocumented workers who are more prone to find jobs under unfavourable conditions. These workers are for the most part migrants. The over-education processes that have involved all OECD countries¹²⁹ leave more room for the employment of low-skilled workers in the lower level of the labour market segmentation (despite the already large presence of Italian low-skilled workers). Also in this case, the workers usually involved in this segmented relocation are migrants.

These structural factors contribute to the strong presence of migrant workers in Italy, as well as to the strong process of substitution of native workers. This polarisation of the labour market that has been taking place for years has the peculiarity of growing much more rapidly in its lower level compared to the higher one. Moreover, immigrant workers, along with women, tend to be a proxy for the allocation of marginal workers in the second tier of the labour market, especially in non-qualified, flexible jobs (Checchi 2013: 166-167).

The distinctive Italian welfare system, which is based on cash transfers rather than on active social/personal services, is one of the main institutional determinants of the strong presence of migrant workers, especially women. Italy's cultural dynamics, typical of familialist societies where the role of family and women assumes an important social connotation, is another relevant determinant (which now results in partial crisis). The economic reinvestment of households in care workers (usually women) employed in their own homes, with direct worker-employer contracts for care and domestic jobs, considerably increases the number of low-skilled women workers in the Italian labour market.

As already mentioned, the prevalence of SMEs in the Italian productive fabric is decisive for the presence of low-skilled foreign workers. The importance of SMEs in Italy is so great that, within the European Union SMEs employ on average a higher number of workers than any other country.¹³⁰ The role of small and medium enterprises as a "non-financial business economy" and

¹²⁹ The Italian educational and skill formation background is already in a lower position than most Western countries (Fellini, Fullin 2018: 312).

¹³⁰ At the same time there is a lower number of large companies.

their average added-value generated are also higher than the rest of European countries (EU Commission, SBA Fact Sheet 2018).

The main problem of the Italian SMEs system is that their high number, in addition to the fact that they are characterised by a low level of coordination between the different administrative levels (local-central) and by high average taxation, makes it complex to invest in Information and Communication Technologies (ICT) and consequently lowers the general competitiveness in the global market, in particular concerning emerging economies (Filippini 2014: 239-240). The problems of Italian low growth rates, low productivity growth and near economic stagnation over the last twenty years are also linked to the massive presence of SMEs. This productive system determines the difficulties in the growth and expansion of small firms, which, due to employers' investment choices or lack of true economic possibilities, are forced not to innovate or make technological investments. Another negative factor is within Italian legislation, which encourages firms not to exceed certain thresholds to avoid increases in taxation (direct and indirect ones). This static nature characterises a large part of Italian SMEs, which is dominated by a system in which the owner(s) act individualistically, preferring continuity to innovation (Filippini 2014: 240).

These attributes of the Italian production system, i.e. the fragmentation into a multitude of SMEs and the consequently limited propensity to innovation, turn out to be propaedeutic to the needs of keeping production costs low by employing low-cost, low-skilled foreign workers, in a process of continuous labour market segmentation and substitution of the native (low-skilled) workforce (Fellini, Fullin 2018).

2.4.2. The Japanese case: populist right-winger "dream"

Japan's case is in several aspects unique within the group of advanced industrialised countries. In fact, unlike the economic and industrial policy choices made by other (Western) powers, it has opted to considerably limit the number of low-cost, low-skilled migrant workers into the archipelago. This was particularly the case during the years of high economic growth and expansion in the global market (roughly up to the 1990s), but it still seems to be a valid principle for today's Japanese economic and migration policies, albeit with some relevant variations. Japan has even been considered a "negative case" for labour migration, i.e. as an economy that unlike other advanced industrialised countries has had a non-significant inflow of labour force from abroad,

especially in the light of the overall dramatic increase in international labour migration flows in recent years (Bartram 2000).

Japan has even been used as an opposite example to the United States migration policies. For example, in 1993 Muller stated that:

"Japan is the prime example of a technologically advanced nation that depends on its own population for nearly all of its workers...Japan's ability to maintain a high living standard with virtually no dependence on immigrant labor reflects some distinctive aspects of Japanese culture, religious philosophy, and nationalism" (Muller 1993: 287-288, in Douglass, Roberts 2003: 19)

Muller takes into account many social and cultural aspects, which involve different dimensions of Japanese society.

In reality, Japanese structural dynamics and labour market needs have been the same as in other industrialised countries. For decades a significant part of the Japanese productive system has been pushing towards opening up to low-cost, low-skilled immigration. Japanese business sees the introduction of this type of differentiated, foreign labour force as a possible solution to part of the national production problems, i.e. its shrinking working-age population, high production costs (especially in the small and medium manufacturing enterprises) and global market competition /neoliberal pressure. As mentioned, this necessity affects more the small and medium-sized production apparatuses, which are more subject to the pressure of global competition and overall costs.

One of the most hotly debated issues in Japanese political debates in recent years has been the endemic labour shortage problem and how to respond to it. The various governments (mostly with an LDP majority), which have characterised Japan's political history since the end of WWII, have never been in favour of opening up to immigration, especially not to low-skilled labour migration. Nevertheless, the challenging national labour shortage has forced a nonstop discussion around the introduction of new migration policies to accept an increasing number of foreign workers, mainly to help SMEs¹³¹ struggling with production costs (Hamaguchi 2019a).

The specific characteristics of Japanese SMEs are crucial to understanding the current production environment. Given their smaller and less organised structure, they are more susceptible to external shocks, partly because large companies are routinely devolving the burden of those shocks onto the SME sectors. Indeed, several economic problems in recent years, in particular Japan's economic stagnation from the '90s and the global economic crisis of 2008, have hit SMEs

¹³¹ In Japan, as in Italy, SMEs are numerically predominant in the domestic production system, representing an essential economic component. In fact, in 2014, 99.7% of companies were SMEs (3.5 million), for a total of 34 million individuals employed in them (equal to about 70.1% of the private sector labour force) (OECD 2020b; Toyonaga 2021).

harder than large companies. Although they may be more efficient than other economic entities of the same type (such as the Italian case, where SMEs are less organised and coordinated between local and central administrative levels and suffer from much higher taxation burden), they are not exempt from the need for technological innovation and lower production costs (Filippini 2014).

While until the late 1980s the Japanese economic structure had managed to remain independent of the need for migrant workers, the labour shortage problem began to hit hard from the mid 1990s. Japanese labour shortage can be summarised as follows: structural-demographic issues, i.e. ageing population and low birth rate, have led to a decrease in the absolute number of the economically active labour force (Mori 1997: 65) and an increase in the dependency ratio (Mori 1997: 65).¹³² At the same time, the increase in the overall educational level of young Japanese has contributed to both an improvement in their educational degrees and their pre-employment technical skills, leading to a shortage of labour for the lower (and low-skill) sectors of the labour market segmentation, known in Japan as the *3K* jobs (*kitsui*, *kitanai* and *kiken*) (Fujiyasu 1991; Mori 1997).¹³³ This upgrading of young Japanese workers' preferences has mostly affected the manufacturing and construction sectors (Watanabe 1990).

In the meantime, there has also been a shift within the Japanese labour market, which it started increasingly to challenge for added value, low-energy and low-resource productions (Mori 1997: 44). SMEs, unlike big Japanese corporations, did not have the economic and organisational capacity to cope with these structural changes. Large corporations could either increase wages or relocate production to Asia, whereas SMEs were unable to adopt such solutions (Watanabe 1990; Spencer 1992). All these processes have created a structural demand for labour in the secondary sector of the Japanese economy, as outlined in dual labour market theories (Piore 1979). Ultimately, the demand for a foreign labour force is still strong, but nothing structural has been done to meet this need.

Within the archipelago's labour market, the socio-economic segmentation between Japanese and foreign workers reflects not only a broader national and international labour division but also the gender division among migrant workers. This separation follows similar patterns to the gender division among Japanese workers. Just as Japanese women find themselves in a subordinate position in the labour market, occupying mostly part-time, low-wage and non-stable jobs, migrant women often are employed in the entertainment and sex industries. Migrant men, on the other hand,

¹³² This is the ratio of people over sixty-five years old compared to the population between fifteen and sixty-four years old.

¹³³ In order 汚い, 危険, きつい, meaning dirty, dangerous and demanding, a concept also known as the 3Ds in the US. Jobs that fall under the *3Ks* are generally associated with "blue-collars" and migrant workers.

are mostly employed as low-level industrial workers, in a process of substitution for native workers (Douglass 2003).

Gender is a socially constructed concept, as cultural institutions and social divisions of power determine the types of mobility¹³⁴ that diversify men and women (Guest 1993). In turn, it is socio-cultural relations that determine gender differences in migration (Sassen 1993).¹³⁵ However, the Japanese case had a particularity compared to other advanced industrial countries: women not only were a migrant vanguard in Japan in the period between 1945 and the end of the 1980s (especially from other Asian countries) but also because their recruitment, legal or illegal, is mostly related to the sexual service sector as hostesses, erotic dancers and prostitutes.¹³⁶ The number of male migrants began to equate with the number of female migrants only later, occupying jobs related to exporting-manufacturing and domestic-market services (Douglass 2003; Shipper 2008). This division is the result of a process of differentiated acceptance. Low-skilled labour migration hostility policies are directed towards male workers who are considered a danger to Japanese social and cultural equilibrium, while women in the "entertainment" industry are generally tolerated (Douglass 2003).¹³⁷

2.4.3. Why has Japan so far opposed low-skilled migration, even though it needs it? A cultural hypothesis

The Japanese government treats the issue of migrant workers primarily on values of "control" and "security". On several occasions during the country's recent history, the LDP government has implemented policies to select and filter carefully chosen foreign workers, based on the demand of the Japanese labour market and specific business/labour institutions and job sector requests (Shipper 2008: 25). However, these needs have proven to be dire, and government policies have often proved insufficient in meeting industry needs.

¹³⁴ In addition to other factors such as rewards and values in the society to which they belong (Guest 1993).

¹³⁵ There are other determining factors such as conditions like cultural acceptance, recruitment networks, information channels and the role of states, political systems, etc. (Douglass 2003).

¹³⁶ Generally, their entry visa is related to the "entertainment" sector.

¹³⁷ The hypothesised reasons for this differentiation are many, including social issues such as specific social divisions, gender inequalities and patriarchal relations based upon the peculiar Japanese Confucian culture (Lebra 1984). Furthermore, the role of the *yakuza* seems to be instrumental in bridging the gap between the demand for this kind of service and the illegal nature of migration in the sex industry. *Yakuza* also aid the process of isolation between women employed in this industry and public opinion (Tiglao-Torres 1993). Finally, the lack of migrant women in sectors where they are usually employed in other countries, such as labour-intensive light manufacturing, is due to the process of offshore relocation of production processes, particularly in East and South-East Asia (Douglass 2003).

Despite the increasing numbers of foreign workers, Japan is still reluctant to consider itself an immigration country (Brody 2002).¹³⁸ Confirming this, even the new partial amendment of the immigration law has seen former Prime Minister Abe's denial that it is about a real new immigration policy (Sugiyama 2018), but only an aid to the labour shortage problem for the Japanese SMEs (Hamaguchi 2019a). His words in October 2018 were: "*We are not considering adopting a so-called immigration policy*" and, "*To cope with the labour shortage, we will expand the current system to accept foreign workers in special fields. We will accept foreign human resources that are skilled and work-ready, but only for a limited time*" (Abe 2018, in Kaveevivitchai 2019). However, previously during other National Diet sessions (October 2014-January 2016), Abe had reiterated the same phrase "*we are not adopting so-called 'immigration policies'*" (Liu-Farrer 2020; Roberts 2018).¹³⁹

So, despite these structural needs, what are the reasons for the Japanese government's persistence in maintaining a negative attitude to the entry of low-skilled foreign workers?

There are several reasons why Japan has so far opposed low-skilled migration. Ethno-nationalist discourse is one of the principal reasons for the reluctance towards immigration (Liu-Farrer 2020: 6). First of all, there is a "cultural" factor, or supposedly so. The main factor in this motivation is the so-called "cultural homogeneity" and the idea of its unique "Japaneseness" (Lie 2003; Burgess 2010).¹⁴⁰ During the late 1980s,¹⁴¹ several political debates on the introduction of foreign labour to meet the needs of the manufacturing industry took place. One of the most recurring themes was the notion that Japan is composed of a mono-ethnic society and the "absence" of ethnic minorities was often echoed by conservative politicians and the media. The identification between state, nation, ethnicity, culture and class made Japan be considered, by the Japanese themselves, as a largely homogeneous country and society (Lie 2003; Kashiwazaki 2013).¹⁴²

The notions of "Japaneseness" and cultural homogeneity are closely interconnected concepts. There would be no homogeneity without being ethnically Japanese, free of external

¹³⁸ Liu-Farrer (2020) defines the term "immigration country" with any country that provides foreign nationals with multiple legal channels to enter and legal pathways and institutional frameworks for permanent settlement. Japan, though based on an ethno-nationalist society, due to the globalisation process has transformed its social structure allowing for a survival of both cultural closure concepts and new migration patterns (Liu-Farrer 2020: 6-8).

¹³⁹ Actually, Japan's migration policy exists, but it has a peculiarity. According to Roberts (2013), Japanese "immigration" policy is referred to by "any other name" that excludes the word beginning with "i" (Roberts 2013).

¹⁴⁰ The issue of "Japaneseness" falls within the sphere of national identity theory. It is present in the literature concerning the uniqueness of a nation and what identifies its people, culture and society from the others. In Japan, this literature is known as *Nihonjiron* or *Nihon bunkaron* (Lie 2003).

¹⁴¹ At the height of the Japanese economic boom.

¹⁴² These considerations turn out to be incorrect, however, as Japan also has ethnic minorities such as the Ainu, Okinawans and *burakumin*. *Burakumin* (in Japanese 部落民, literally "villagers/village people") are descendants of outcast communities, segregated from the rest of Japanese social order (Shipper 2008: 34; Neary 2009).

"contamination". There would be no homogeneity without the absence of class divisions, considered by the advocates of the "Japaneseness" paradigm an exclusiveness of Japanese culture and society. The Japanese have for decades considered themselves a universal middle-class society¹⁴³ and a relatively affluent, egalitarian mass society with no class divisions (Lie 2003).¹⁴⁴ These considerations create frictions for the presence of those who are seen as carrying potential vectors of inequality due to less overall education and lower social status, namely foreigners. They are potentially seen as carriers of social shocks that are extremely dangerous for the socio-economic balance of this middle-strata society.¹⁴⁵

The cultural factor has been used as a deterrent to the entry policies for low-skilled foreign workers: their eventual access into the archipelago would lead to problems of social instability both in the labour market and in everyday life. This belief is amplified by the idea that the Japanese are little or not at all prepared for the inclusion of such diversity in their cultural environment. Moreover, this specific difficulty is justified by the fact that Japan, being an island nation, is characterised by historical-geographical isolation that keeps its characteristics distinct from other populations (Eisenstadt 1996) and therefore unable to absorb and integrate migrant workers and alien cultures (Kanji 1990; Tezuka 1992). Conservative politicians, the first to consider Japanese economic success as the result of the natural harmony created by its national homogeneity, have always been concerned about the possible consequences of opening up the archipelago to low-skilled migration, fearing a process of social disharmony (Brody 2002: 3). Their main concern is that the entry of unskilled labour will lead to the formation of a permanent foreign underclass by further segmenting the labour market (Kanji 1990; Tezuka 1992) and a consequent general decline of the nation's living standards (Kanji 1990). Moreover, many components of Japanese society still

¹⁴³ The social perception of belonging to a single, homogeneous middle class reached its highest peak in the late 1970s, when 90% of Japanese perceived this to be the case (Chiavacci 2008). Contrary to this belief, in recent decades the Japanese media has increasingly covered the topic of the growth of *shakai kakusa* (社会格差, literally social disparity), i.e. the staggering increase in inequality and poverty (Dore 2013b: 52-53). Popular perceptions have also worsened, particularly after Prime Minister Koizumi's neoliberal structural reforms (Yamaguchi 2008). Income inequality has increased rapidly since the mid-1980s, in proportion to the decline in household incomes (OECD 2008). In fact, Japan has been below the average of OECD countries for more than a decade in terms of poverty rate (ratio of the number of people (in a given age group) whose income falls below the poverty line; taken as half the median household income of the total population) (OECD 2021b).

¹⁴⁴ A "class-free society with the narrowest income gaps between the rich and the poor among industrial nations" (Suzuki 2013: 94).

¹⁴⁵ In fact, Japan is repeatedly described as a highly vertical society (in Japanese *tate shakai* or 縦社会), characterised by "vertical stratification by institution or group of institutions" (Nakane 1970: 87), and as an essentially hierarchical society (Greenbie 1988: 12). It has also been regarded as a class-stratified society (Steven 1983: 319). Some relevant examples of inequality and hierarchy are the school system, not only in universities (where verticality is well-known with Tōkyō University at the top), but also in primary and secondary schools which demarcate a clear social separation between those who attend good schools and those who do not (Ehara 1984: 265-266). This hierarchisation also occurs, consequently, in occupations and incomes (Ishida 1998: 307).

contain residual post-colonialist socio-cultural behavioural patterns, deriving from thoughts and ideologies born in the imperial era and surviving until today. One example is the strong influence of the intellectual Fukuzawa Yūkichi, who with his work "Bunmei-ron no Gairyaku" (An Outline of a Theory of Civilization, 1875), laid the foundations of modern Japan,¹⁴⁶ including the ambiguous (and often xenophobic) approach towards foreigners (Russell 2009; Arudou 2015).¹⁴⁷

The separation between the "inside" (*uchi*/内 in Japanese) and the "outside" (*soto*/外 in Japanese), i.e. what divides those who are Japanese from those who are not (Doi 1986; Reischauer, Marius 1995), seems to be the reason for the country's egalitarian social structure (Kanji 1990; Tezuka 1992) and its subsequent economic success (Muller 1993), as well as its low crime rate (Kanji 1990). These arguments were primarily debated during the second half of the 1980s between proponents of maintaining the country's closure to low-skilled immigration (*sakoku*/鎖国) and those who supported the thesis of the need for opening the country to foreign workers (*kaikoku*/開国) (Brody 2002: 37-40).¹⁴⁸ The closure argument has been central in LDP policy against migrant workers in recent decades.

These "myths", however, clashed with the reality of the country's internationalisation process (*kokusaika*/国際化 in Japanese), which began in the mid-1980s thanks to the slow but steady influx of foreign migrant workers into Japan (Machimura 2000). The new 2018 ICRA amendment discussed in Chapter I is tangible proof of this. Internal market pressures have inevitably led to a reassessment of what has been described so far. To sum up these recent changes, in December 2018, Japan amended its National Immigration Law to officially allow the entry of medium and low skill foreign labour. Unlike the various "backdoors" opened during the economic boom of the late 1980s, this was the first time the Japanese government officially accepted the entry of low skilled foreign workers. The amendment established two new types of status for foreign workers: the

¹⁴⁶ His figure is even featured on the 10,000-yen banknote.

¹⁴⁷ Fukuzawa, through the influence of Western eugenics studies of the time, constructed a racial hierarchy based on the political needs of the time and functional to colonial control. In particular, he associated social behaviour with skin colour, thus creating a hierarchy in which Westerners were at the top ("persons of white skin", the pinnacle of "civilisation"), Asians in the middle ("semi-civilised" or in Japanese *hankai* (半開), with Japan at the top of this group), while Africans and Aborigines at the bottom ("people of dark skin", identified as "barbarians" or in Japanese *yaban* (野蠻)) (Russell 2009; Arudou 2015). This Eurocentric approach allowed Japan to shift its cultural identity towards Western models, particularly the Anglo-Saxon one (Mitchell 2019: 3-7).

¹⁴⁸ This debate led in 1989 to the amendment of the Immigration Control Act and the subsequent creation in 1990 of the Immigration and Refugee Recognition Act (Brody 2002: 40-43).

Tokutei Ginō 1 Gō and the *Tokutei Ginō 2 Gō*. The first is aimed at foreign workers with a predetermined minimum skill set. In contrast, the second is aimed at highly skilled foreign workers. The first type of visa, which lasts five years, does not allow them to be accompanied by their families, while the second has no limits on the renewal of residence permits and allows the presence of family members, taking on the characteristics of a true migration law (Hamaguchi 2019a).

This dichotomy is a sign of how, despite strenuous political opposition to such change, structural and market forces are so strong that they can change a peculiar, established structure that is openly hostile to foreign labour.

2.4.4. Why is it not possible for Japanese society to accept foreign workers, even if they are an indispensable labour force? Socio-legal and economic viewpoints

The global crisis of 2008 brought to light dynamics that Japan had thought it could avoid, freeing itself from direct Western influences, especially from the USA. Between October and November of 2008, the case of the *haken giri*,¹⁴⁹ or layoffs of employees sent to large manufacturing companies by temporary staffing agencies, hit the headlines. The group most affected by this phenomenon were migrant workers, and specifically the *nikkeijin*,¹⁵⁰ the only social group not (completely) Japanese qualified to be employed in the unskilled sectors (3Ks) (Tanno 2010: 109). This selective process further marked the dualistic nature of the Japanese labour market (and no longer "meritocratic" and "homogeneous" as it was indigenously considered), reinforcing internal divisions between Japanese and non-Japanese, even within the same job and level of labour qualification. This differentiating process was thus highlighted in the field of labour and social rights as well (Tanno 2010: 109).

What would be the cause of this peculiar differentiation inside the Japanese socio-economic system, in light of the structural need for a low-cost and, above all, flexible workforce, determined even more by the particular situation linked to the 2008 economic crisis?

¹⁴⁹ In Japanese 派遣切り.

¹⁵⁰ In Japanese 日系人 or 日系 (*nikkei*). Japanese emigrants and their descendants, who are part of the Japanese diaspora started at the beginning of the 20th century, especially to Brazil and other South American countries. They were "summoned at home" during the economic boom of the eighties as "ethnically" privileged subjects to replace Japanese citizens in the areas of the labour market belonging to the so-called 3Ks (*kitanai, kiken, kitsui*) (Brody 2002: 3; Shipper 2008: 44). Despite its broader meaning, that will be explained later in this Chapter, the term is usually applied to (mainly) Brazilian citizens of Japanese origin.

The answer seems to lie in the socio-legal system in Japanese civil society, which turns foreign workers of Japanese origin (and also foreign trainees)¹⁵¹ into second-class citizens simply because they are foreigners, not by incorporating them into the broader logic of civil society. The incorporation of foreigners into the logic of civil society in Japan is extremely different from, for example, what happens in the West (Tanno 2010: 123-124). Consequently, it is difficult to change the dynamics of acceptance of foreign workers, despite the continuous demand for their presence in order to lower production costs and face the competition accentuated by globalisation.

Returning to an example of the initial question, workers may be considered as targets of the flexibilisation necessitated by the crisis of 2008, and also as part of redundancy in the labour market (easier layoffs in case of surpluses in the just-in-time system, determined by the shrinking of demand during the economic crisis) (Tanno 2010: 110-112).

In fact, it is the Japanese just-in-time system that has created the basis for a systematic reduction in the workforce required for production, especially in areas such as the automotive industry. Fundamentally, this production system involves synchronisation of production activities, while efficiently and effectively managing the exact number of orders through a widespread process of information sharing that starts with the parent company and ends with the smaller sister companies at the end of the production chain. Such an organisation must take full advantage of labour flexibility, based on market fluctuations, in order to survive. In this case, migrant workers are the employers' favourite choice of labour, as the costs are lower than for native workers, which does not always correspond to an equal rate and overall quality of productivity.

Having a production linked to the exact quantity of orders in turn requires keeping a certain number of components in stock (averaging three or four days in the production cycle). This organisational behaviour has seen a conspicuous increase with the expansion of the sector in 2002. With the advent of the economic crisis of 2008, these surpluses became a difficult problem to dispose of, affecting first and foremost foreign workers, those most closely linked to the fluctuation of job flexibility. In this new economic reality, however, the arrivals of new *nikkeijin* in Japan did not stop, as the inherent flexibility of these workers and the combination with the need to cut production costs led to a preferential process of turnover among foreign workers rather than between non-Japanese and Japanese (Tanno 2010: 110-111).

Thus, the combination of an unfavourable socio-legal system and an economic system that favours a race to the bottom as well as "ethnic" turnover in low-productivity sectors has not helped the development of a generally positive environment for the foreign presence in the Japanese labour

¹⁵¹ They will be introduced in the next section.

market, let alone the liberalisation of migration policies. Despite the drastic drop in the number of *nikkeijin* after the burst of the bubble economy in the nineties, *nikkeijin* workers, along with foreign trainees, have continued to be one of the pivots for low-skill work in the ailing economic sectors, limiting other possibilities of solving problems from outside the country. In fact, if the presence of unskilled foreign labour¹⁵² (or simple labour)¹⁵³ seems to be a paradox with respect to Japan's rigid migratory structure, the demand of the labour market and SMEs is appeased in part by international students, another source of cheap labour (Liu-Farrer 2009), and by several categories of low-skilled foreigners, namely "trainees" and "technical interns" (Liu-Farrer 2020). The next section will briefly introduce these figures.

2.4.5. History of Japanese migration policies: a brief overview

Summarising the most recent events that led from total opposition to almost any form of entry migration policy to the selective opening of 2018 is not an easy task, as it would be necessary to delve into a multitude of facets of Japanese society from its modern era to the present. The following is a summary of the events of the last sixty years.

During the 1960s and 1970s, at the height of its economic growth, the Japanese government repeatedly passed decisions against the entry of foreign nationals. With the onset of the bubble economy during the 1980s and the consequent need for more cheap labour at the request of employers, the policy debate gained new vigour and importance. In 1988, the then Ministry of Labour¹⁵⁴ proposed an employment permit system linked to employers obtaining the necessary authorisation to hire workers while they were still residing in their country of origin. The Ministry of Justice, the main institution in charge of immigration issues and the main historical detractor of the relaxation of Japanese migration policies, derailed this proposal (Hamaguchi 2019a: 2).

The compromise reached between the various ministries and the capital was in the 1989 amendment of the Immigration Control and Refugee Recognition Act (ICRRA) and the opening of the first migration "side door". This allowed *nikkeijin* of Japanese origin, mainly South Americans (especially Brazilians), to enter the archipelago up to the third generation, obtaining the status of permanent residents and having no work restrictions. This solution sought to satisfy the demand for

¹⁵² In Japanese 未熟練 (*mijukuren*).

¹⁵³ In Japanese 単純労働者 (*tanjun rōdōsha*).

¹⁵⁴ Now Ministry of Health, Labour and Welfare (MHLW).

a low-cost workforce, while at the same time maintaining the cultural and ethnic continuity demanded by the more conservative side of Japanese politics. This amendment has also introduced the term "trainee", originally resulting from a series of international agreements to bring foreign apprentices to Japan (Hamaguchi 2019a: 2).

In 1993, the Technical Intern Training Program (TITP) was introduced, extending the period spent as a "trainee" and adding the "technical intern" role. The former was not considered a worker, while the latter was. The duration of the programme was initially two years, later becoming three years in which study and on-the-job training were supposed to alternate. However, this division was often unclear and it was generally a type of work disguised as training. In 2009, the status of "technical intern" was recognised for residency status, but without solving the problems and criticism of TITP (Hamaguchi 2019a: 2).

In 2016, the government established a new act concerning the Proper Implementation of the Technical Internship of Foreigners and Protection of Technical Interns (Technical Internship Act), in which the possibility to reside in Japan for technical interns was further extended. This Act stipulated that at the end of the three-year internship it was possible to renew the project for a further two years, subject to return to the country of origin before its renewal. The duration of the programme was set at five years, including more and stricter regulation, but with strong limitations due to the impossibility of changing firm during the entire project period. This rigidity led to an increase in the phenomenon of technical interns leaving the internship programme to enter the Japanese illegal labour market as irregular migrant workers (Hamaguchi 2019a: 3).

At the same time, as in all advanced economies, Japan had implemented several policies to attract high-skilled workers. In 2012, the Japanese government introduced a score-based system for highly skilled foreign professionals, similar to the US Green Card system. In 2017, the period required to apply for permanent residence was shortened to three years or one depending on the score obtained in the assessment system. The selectivity of Japanese migration policies is a common feature in the race for advanced human resources that all advanced economy countries are competing for (Hamaguchi 2019a: 3).

Finally, as mentioned at several points in the text, on 8th December 2018 yet another amendment to the ICRRA was passed, introducing two new types of residency status, namely Specified Skilled Type 1 and Specified Skilled Type 2 (*tokutei ginō 1 gō* and *tokutei ginō 2 gō*), allowing the official entry of foreign semi-skilled workers into the archipelago for the first time in Japanese history. This was a political response to requests from SMEs to counter the endemic demand for low-cost, low-skilled labour caused by the national labour shortage. Type 1 covers

workers who already have a certain level of skills, and is a natural continuation of TITP as it would allow those who have completed the five-year programme to continue working in Japan. Type 2, on the other hand, is again aimed at highly skilled foreign workers capable of performing advanced professional or technical tasks. While the former type of workers cannot bring their families to Japan and the renewal of the residence permit is limited to another five-year cycle, in the latter case it is possible to bring the worker's family members to the archipelago and to have no restrictions on the renewal of the residence permit, thus being more reminiscent of a real immigration policy (Hamaguchi 2019a: 3-5).

These have been the most recent developments in Japanese migration policies. However, due to the COVID-19 pandemic, the results of this new migration policy are not yet visible and are momentarily put in jeopardy. This summary of Japanese migration policies will be taken up and expanded upon in the following section on data on the foreign population inside Japan, in order to provide a clearer picture of the reasons for the presence of some specific categories of foreign workers in the archipelago.

2.4.6. Section recap: why do markets need migrant workers?

In general, it is the labour market of the contemporary economy that creates a constant demand for migrant labour. Basically, since the industrial revolution, migrants have been accepted and demanded to fill the shortage of native labour. This perspective is functionalist, aimed at filling the structural difficulties of national markets (Ambrosini 2020: 72).

Italy, like the other Mediterranean countries, has had a "harsher" version of this mechanism. In the so-called "Mediterranean" model (Pugliese 2002), neoliberal processes of transformation towards market deregulation and liberalisation¹⁵⁵ intertwined with a pre-existing traditional system.

¹⁵⁵ Initially, the Italian labour market was highly regulated. Fixed-term contracts were regulated in 1962, but only in limited cases or if they were authorised through collective agreements or administrative authorisation. Part-time work was only allowed in 1984. The Treu law of 1997 began to regulate TAW, while legislative decrees 61 of 2000 and 368 of 2001 allowed for the bypassing of the constraints imposed by the 1962 law on fixed-term contracts, adapting to EU directives on part-time work and fixed-term work. From here onwards the process of deregulation began to take hold with greater force and speed: the Biagi law of 2003 modified the range of labour relationships, then in 2007 and 2008 several examples of increasing deregulation in non-regular contracts resulted (Sacchi 2013: 195); in 2012 the top-down Fornero labour reform partially changed the Workers' Statute to make individual dismissals for economic reasons easier and de-segmenting the labour market (Sacchi 2013: 203); the most recent Jobs Act of the Renzi government (2016), a labour law reform in which the open-ended contract with "growing protections" and the possibility by the employer to dismiss an employee without just cause was introduced. It is interesting how neoliberal deregulation initially affected the lower part of the Italian dualised labour market, and then gradually hit the upper strata, made up of full-time, regular workers.

These economic structures, characterised by a large presence of SMEs and self-employment, an important role for agriculture, construction, tertiary and hotel services, and the vast presence of the informal economy, have led to particular conditions of entry and employment (Ambrosini 2020: 72).

Moreover, the Italian case presents the peculiarity of being differentiated according to the various local contexts. These territorial imbalances have led to substantial differences in demand within the peninsula (Ambrosini 2020: 78). The factors that determine the demand for migrant labour in the Italian case can be summarised as the particular industrial fabric (the economic crisis of 2008 hit SMEs more violently, increasing their need for lower production costs as they were structurally unable to implement other forms of counteracting the problem); the seasonality and discontinuity of sectors such as construction, tourism and agriculture; the characteristics of (especially urban) services, which are increasingly in demand and also necessary for the functioning of urban society (but which present extremely insecure and underpaid working conditions); the need, which is also structural, for labour in the domestic and family care sector, due to Italian welfare system characteristics (Ambrosini 2020: 77-78).

Since the Japanese case, in several aspects, presents similar structural attributes, the political opposition to immigration may seem "striking". The biggest difference would seem to be the issue in the domestic and welfare sector, as Japan has been slower than the Mediterranean countries in moving away from the gender differentiation and the change in women's role from educator mother (*kyōiku mama*)¹⁵⁶ and welfare pillar in the family context (Chiavacci, Lechevalier 2017). This transformation in traditional gender roles, which only started during the Japanese economic crisis of the 1990s, affected the social contract that saw a perfect balance of roles in society (the so-called "Japanese way of life") (Chiavacci 2007).¹⁵⁷ This setback has delayed not only the crisis of Japanese identity (and the difficulty of managing the problem because of its meagre welfare

¹⁵⁶ In Japanese 教育ママ, literally "education mother".

¹⁵⁷ The "Japanese way of life" is the social contract stipulated between the Japanese population and elites that determined the success of Japanese economic policy until the early 1990s, but was also the determinant for its subsequent crisis. This concept can be summarised in the search for stability and security as a priority, through high educational attainments that would result in stable employments and security in internal career advancement. This is also determined by the clear differentiation of gender roles, where men take on the role of main breadwinner through life-long employment as clerks (the so-called *sararīman* or サラリーマン), while women take on the role of educating mothers whose aim revolves around the family and the scholastic success of their children (*kyōiku mama*). The "Japanese way of life" has been an example of successful economic growth, or rather, from the Japanese point of view, shared growth. Despite the structural changes and diversification processes that took place during the 1990s, which created a de-standardisation of employment, this system has not disappeared completely, but has undergone significant erosion (Chiavacci, Lechevalier 2017). This contamination and progressive destruction of the "Japanese way of life" has resulted in creating increasing social division and growing inequalities in a society hitherto considered fair and meritocratic, creating high levels of social anxiety and societal pessimism linked to the crisis of the Japanese economic policy model during the 1990s and the subsequent economic stagnation (Hommerich 2016).

provisions) but also the political discussion on new solutions to the problem of care in the nation with the most rapidly ageing population in the world. Despite these (and other) factors, Japan has steadfastly resisted radical changes in its migration policy, until a slight shift in 2018.

2.5. Data on the presence of foreign population in Italy and Japan

2.5.1. Who are the migrants in Italy?

In Italy, until 1st January 2021, most of the foreign population came from Romania (1,137.728), Albania (410.087), Morocco (408.179), China (288.679) and Ukraine (227.587), for a total of 5,013.215 foreign citizens residing in the peninsula. The first three nationalities alone account for almost 39.3% of the total migratory phenomenon, while in total the first ten reach 63.5% (we must therefore add Filipinos, Indians, Bangladeshis, Egyptians and Pakistanis) (Fondazione ISMU 2021). As of 1st January 2021, Italian residents totalled 59 million 258 thousand, 384 thousand less year-over-year to mark the steady decline in population.¹⁵⁸ The migration balance is positive, with 79 thousand more units (or 1.3 per thousand population), half of 2019; this data shows that migration flows with foreign countries have slowed down due to the Covid-19 pandemic (ISTAT 2021).

¹⁵⁸ In 2020 the natural population balance was largely negative (344 thousand births versus 737 thousand deaths), as well as the net migration balance with foreign countries (47 thousand registrations against 96 thousand cancellations). The balance due to adjustments of a registry-related nature was negative too (minus 37 thousand), while, as partial compensation for these decreases, there is only the aspect of acquisitions of Italian citizenship (about plus 100.000 units) (ISTAT 2021).

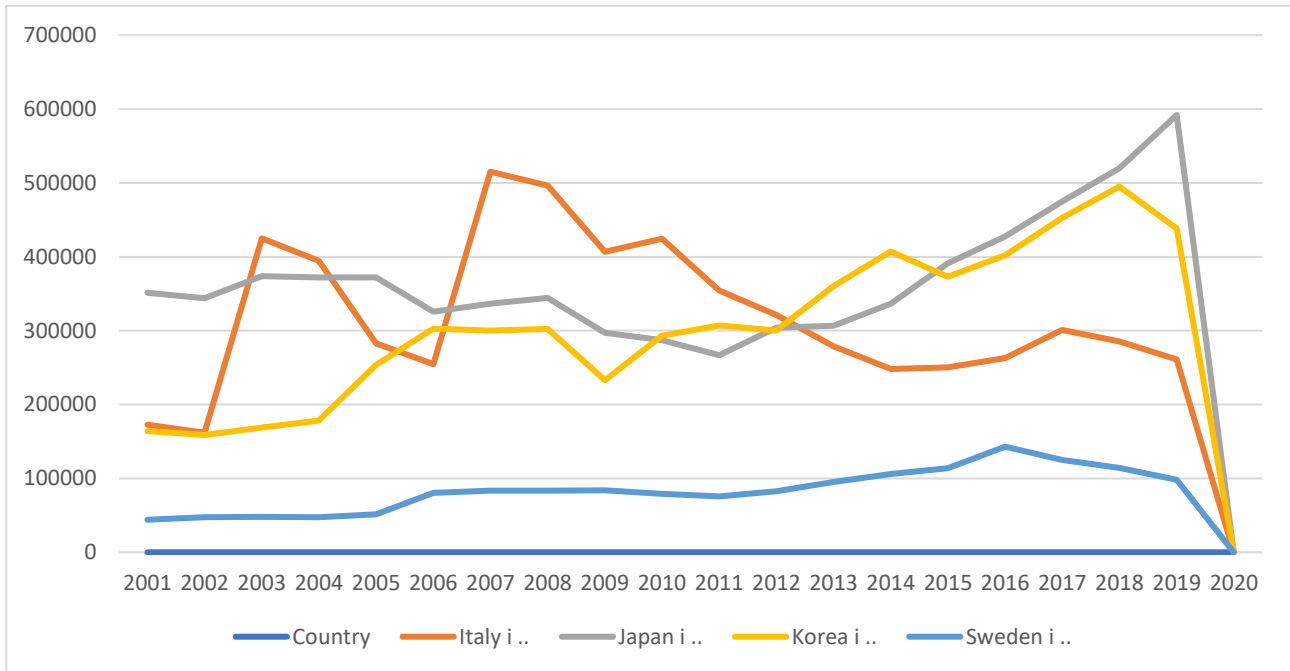


Figure 2.3. Migration in Italy, Japan, South Korea and Sweden (2001-2019) (OECD 2021c, International Migration Database).

Historically, Italy was a country of emigration for much of the 20th century. In the 1970s the net migration rate reversed from negative to positive, thus marking a reversal of the trend. In those years, Italy ceased to be a country of emigration but had not yet become one of immigration. It would have become one from the end of the 1970s and the beginning of the 1980s, thanks to better working conditions and higher wages (that were slightly lower than in France), especially in the north-western Italian regions (Strozza, Venturini 2002; Menz 2009).

Migration flows to Italy have been characterised by different cyclicalities. The historical moment, the countries of origin, migration laws and regularisation procedures, known as *sanatoria*,¹⁵⁹ have changed over time and have determined an important variety of migration dynamics and migrants' characteristics. There are "old" and "new" migrants. The former mainly come from Africa and Asia, having arrived in Italy with the migration flows of the 1990s. The countries interested in this early phenomenon were mainly Morocco, Tunisia, Senegal, Ghana, Egypt for Africa, the Philippines and China for Asia, but also interested Eastern European countries (e.g. Romania), countries of the former Yugoslavia as well as South American ones (e.g. Peru) (Strozza, Venturini 2002).

¹⁵⁹ *Sanatoria* is an institution of Italian administrative law. With it, the public administration rectifies an administrative act that is unlawful because it lacks the essential requirements laid down by law. In this case it is used with the meaning of "regularisation procedures".

A peculiar characteristic of immigration into Italy is the large number of undocumented migrants. This peculiarity is typically present in Mediterranean countries. Most undocumented migrants come from less developed countries (LDCs) (Carchedi 1999). They are often employed in the lowest strata of labour market segmentation, not infrequently in the informal economy. Far from being a unique case, the shadow economy¹⁶⁰ is an increasingly important component in advanced and growing economic systems (Ambrosini 2020: 85), even though in Italy it seems to have had a stronger presence. In Italy, the shadow economy has deeper and more endemic roots. Lack of controls, a combination of "old" and "new" production styles in the economic system, rigidity in entry policies and the needs of the market (a mix of employers' general weakness and their economic convenience), create the perfect context for the development of this type of economy (Ambrosini 2020: 85-86).

Since 2020, the year of the global pandemic, migration data in Italy have undergone changes. In fact, although migration has been the most dynamic demographic component in the last twenty years, in 2020 it has been "limited". This phenomenon, which has affected most countries, is mainly due to the barriers of entry to national territories and the limitations to internal movement, making it *de facto* impossible to move regardless of the reasons. In Italy, registrations in the registry for residence transfer (from abroad to Italy) have therefore reduced by 34% compared to 2019 (from 333 thousand to 221 thousand), cancellations from it by 21% (from 180 thousand to 142 thousand). The net migration balance with foreign countries stops at 1.3 per thousand inhabitants, exactly half of that detected in 2019. The reduction affects all areas of the country, but mainly Central (from 3.6 to 1.9 per thousand), North (from 3.2 to 1.6 per thousand), more than South (from 1.1 to 0.6 per thousand) Italy (ISTAT 2021).

¹⁶⁰ In Italian "*economia sommersa*".

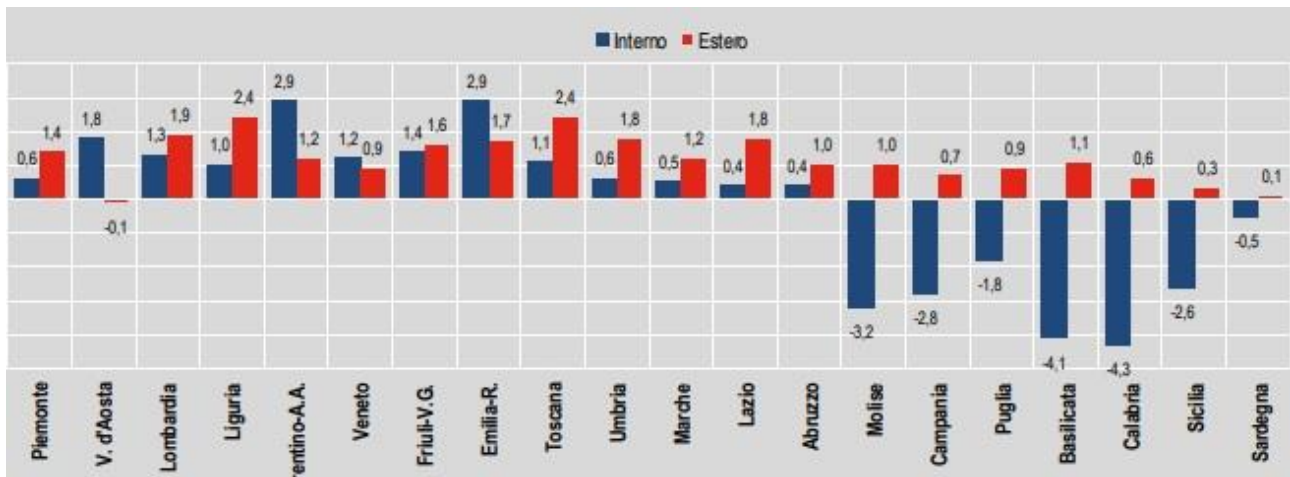


Figure 2.4. Internal/external migration balance, divided by region (2020, per thousand residents) (ISTAT 2021: 7).

Finally, foreigners residing in the country showed a decrease of about 4 thousand units (-0.8 per thousand) compared to 2019. In the calculation, contribute the balance of 128 thousand more units due to migration with foreign countries (of which 174 thousand registrations and 46 thousand cancellations), 51 thousand units more due to the natural dynamics (60 thousand foreign births against 9 thousand deaths), 84 thousand units less due to the effect of registry revisions and about 100 thousand units less due to the acquisition of Italian citizenship. These data show a trend towards stabilisation (or relative stagnation) of the foreign population,¹⁶¹ a phenomenon that has happened before (2015-2016), but in this case exacerbated by Covid-19 (ISTAT 2021).

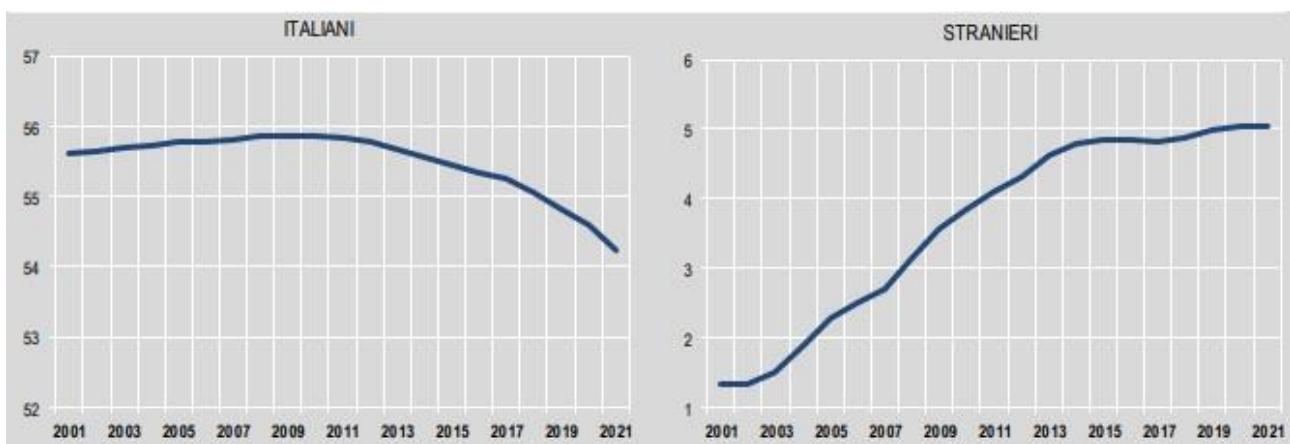


Figure 2.5. Resident population in Italy (2020-2021, data in millions). Istat, Population reconstruction (2001-2018), Census of the population (2019-2020), and provisional data (2021) (ISTAT 2021: 8).

¹⁶¹ Despite an increase in 2020 of the landings from the Mediterranean (plus 34 thousand), after two years of decrease (23 thousand in 2018 and 11 thousand in 2019) (Fondazione ISMU 2021).

In the Italian labour market (2019), non-Italian employed people exceeded 2.5 million, out of a working-age population of over 4 million. Foreign workers represented 10.4% of the working-age population, 11.2% of the labour force, 10.7% of the employed and as much as 15.6% of the total unemployed. In 2019, the foreigner employment rate was 61% and has then declined slightly, partly due to the negative trend in the female employment rate. The unemployment rate was 13.8% (compared to 9.5% of Italians), with higher peaks among the female component (16.3%) and non-EU youth (24%). Confirming the unemployment figures (and despite improvements in school attendance rate), more than 9 out of 10 young non-EU workers perform low-skill, low-paid work. This causes a double negative phenomenon: the first involves young people, denoting a structural disadvantage of young first and second generation immigrants that involves all European countries; the second concerns women, especially young foreign women, due to their early involvement in the work of caring for their families. In fact, 23.1% of non-EU women under 24 years of age state that they have to take care of their children or other family members, as opposed to 4.1% of Italian women. Since 2020, after the outbreak of the global pandemic, the participation of the foreign workforce among key workers (production of essential services, especially during the health crisis) has been evident, namely in the agri-food sector, family care, health care and logistics. The wage gap between native and foreign workers, a common trait in all OECD countries, in Italy turns out to be more pronounced (at least with regards to the EU average), where the risk of poverty or social exclusion of the adult population (Italian and foreign) is high. For Italians, the risk is assessed at 26.3 per cent, more than 5 points higher than the EU28 average (21 per cent), while it stands at 53.8 per cent for non-EU foreigners and 42.3 per cent for EU foreigners (Di Pasquale *et al.* 2019). For foreign-only households, relative poverty stands at 34.5 per cent and absolute poverty at 29.2 per cent, compared to Italian households, which stand at 12.3 per cent and 6.9 per cent, respectively (ISTAT 2018).

Former OECD Secretary-General Ángel Gurría's statement "*Italy is currently trapped in a low-skill equilibrium*" (ANSA 2017; Fellini, Fullin 2018: 322), is particularly marked by the data on foreign labour: migrant workers are consistently positioned in the secondary tier of the Italian labour market, especially in some sectors characterised by low skills, low pay, low protection, and low social and professional mobility (collective and personal services (36%), agriculture (18.3%), catering and hotels (17.7%), construction (17.6%), Covid-19 pre-pandemic data).¹⁶² This strong segmentation occurs despite the fact that Italy, even during recent economic crises, has a higher

¹⁶² However, foreign employment remains extremely low in other sectors, such as public administration (0.2%) or in financial and insurance activities (1%) (Marinelli 2019: 674; Direzione Generale dell'Immigrazione e delle Politiche di Integrazione 2020).

employment rate of foreign workers than the Italian labour force (Marinelli 2019: 674; Direzione Generale dell'Immigrazione e delle Politiche di Integrazione 2020).

Legal-administrative aspects must also be considered, since the recent regularisation thanks to the Bilanci Decree (2020) has led to a total of 207,542 applications for legal emersion, of which 176,848 for domestic work and personal care and 30,694 for work in the primary sector (agriculture and fishing). However, despite the structural needs of the labour market, Covid-19 further highlighted the precariousness and vulnerability of migrant workers in Italy, reinforcing these negative aspects with respect to the past. The regularisation itself, i.e. the new *sanatoria* 2020 made by the Minister of the Interior Lamorgese, has once again brought out the Italian economic grey area, i.e. the distance between the law and the reality of the labour market (Fondazione ISMU 2021), again placing migrant workers into the lowest layer of the highly segmented domestic labour market.

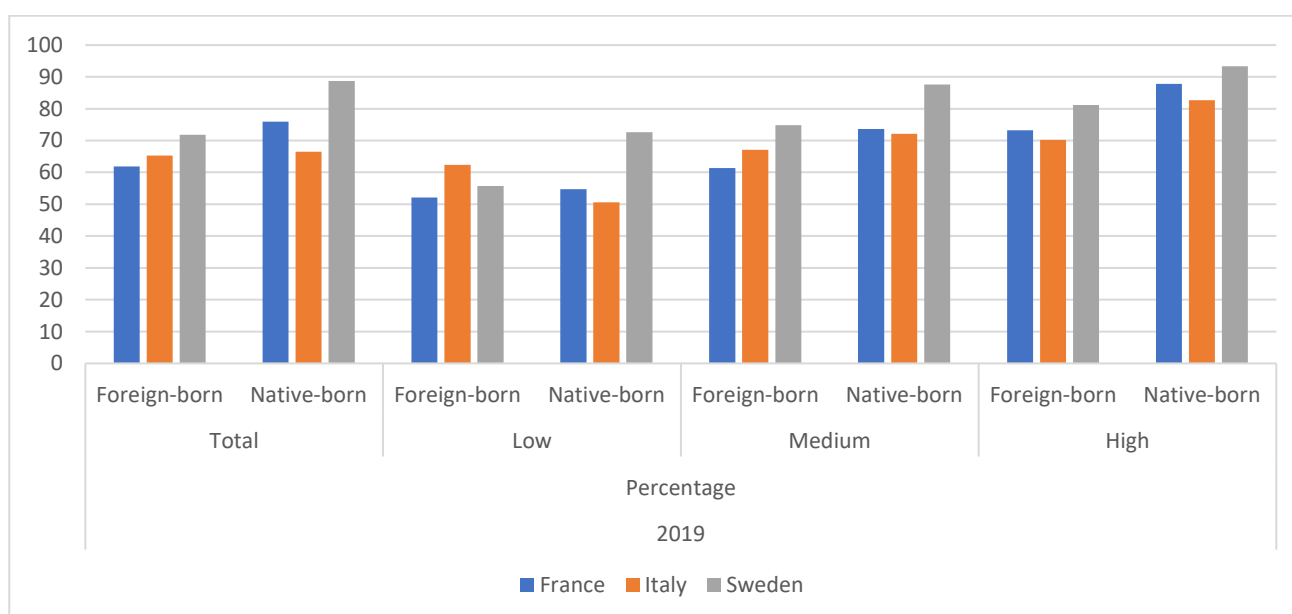


Figure 2.6. Employment rates by place of birth and educational attainment (25-64) in France, Italy and Sweden (2019) (OECD.Stat 2021b).

2.5.2. Italian migration policy: a brief overview

Summarising the history of Italian migration policies is not an easy task, especially owing to their precarious structural nature and the fact that, until recent years, Italy was considered a country of emigration. In fact, between 1876 and 1976, about 24 million Italians emigrated abroad, thus

constituting one of the most relevant emigration phenomena within the global context. This phenomenon, although of a considerably reduced entity, has not yet stopped. Only in the sixties, with the beginning of Italian economic prosperity, did the first migration flows towards Italy begin. Italian migration policy, caught unawares by this phenomenon, elaborated itself in more structural form only 20 years later as a first response to the lack of legislation on the topic (until 1986 the *Testo Unico*¹⁶³ relating to Public Security Laws of 1931 was in force, in addition to a series of ministerial circulars and the consistent use of *sanatorie*,¹⁶⁴ later accompanied by the circular of the Minister of Labour on the employment of foreign workers of 1964 and the ratification, in 1981, of the ILO Convention on the promotion of equality and treatment of migrant workers of 1975). In 1986, the Foschi law was introduced (Law No. 943 of 1986), which attempted to regulate the migration phenomenon in advance, introducing regulation on family reunification and promoting equality between Italian and non-Italian workers. The results, however, were weak, and a *sanatoria* was resorted to in that case as well (Casella 2016). This is also the origin of the concept of the migration "quota", an attempt to manage migration based on perceived functional and sector needs and countries of origin. It is a system of "reward" and "punish" that rewards (or punishes) the countries of departure based on their collaboration on issues such as joint migration control, border enforcement, and deportation within bilateral treaty frameworks (Basso, Perocco 2000).

The first legislative effort that attempted to give organic quality to the phenomenon was the Martelli Law of 1990 (Law No. 39 of 1990), which, however, followed the emergency basis that has characterised the entire legislation up to the present day and which was mainly based on public order and collective security. It created a mechanism for the quantitative programming of immigrant entry flows, especially economic migrants, i.e. the establishment of a residence permit issued by the *Questura*¹⁶⁵ or by a competent Commissioner. A system of expulsion of socially dangerous foreigners and irregular immigrants was also implemented. Together with another *sanatoria*, the Martelli Law began the process of convergence with the migration policies in force in other European countries. Its shortcomings, however, led to the constant searching to resolve its legislative loopholes, such as the Mancino Law (1993) in the matter of xenophobia and discrimination, the Conso Decree (1993) that modified expulsion procedures and the Puglia Law (Law No. 563 of 1995), the current basis of the Italian reception system that originally decreed the

¹⁶³ Under Italian law, it is a collection of rules governing a particular matter, abbreviated to TU.

¹⁶⁴ Plural of *sanatoria* and translatable as "regularising processes".

¹⁶⁵ Translated as "Police Headquarters". The *Questura*, in Italy, is an office of the Department of Public Security with provincial competence, under the Ministry of the Interior.

opening of *ad hoc* centres along the coast of Apulia in response to migratory flows from Albania (Casella 2016).

In 1998, the first text on the discipline of immigration and the condition of the foreigner in a systematic and general form was introduced, the Turco-Napolitano Law (Law No. 40 of 1998). It introduced the procedures of labour regulation and those of social integration, saw greater planning of migratory flows and made Italian legislation on the subject more streamlined and orderly for the first time. It also created the centres of temporary stay and assistance for the identification and eventual expulsion of immigrants (Casella 2016).

In 2002, Italian migration policies saw a restrictive turn and a tightening of overall procedures with the Bossi-Fini Law (Law No. 189 of 2002), due in particular to an aggravation of the public debate on the topic and the concerns dictated by the opening of the borders to new European states. Despite being accompanied by an impressive *sanatoria*, the law determined a general increase in controls, decreasing the duration of residence permits from 3 to 2 years. It introduced the obligation to provide fingerprints by non-Italian citizens and added the crime of illegal stay. Finally, the Bossi-Fini Law created the contract of stay, a tool that made it more difficult for foreign workers to enter Italy (Casella 2016).

After the failed attempt of the Amato-Ferrero Bill (2007), aimed at limiting the harshness of the Bossi-Fini Law, began the season of harmonisation of EU migration policies through a series of European directives. A further process of the tightening of Italian migration policies occurred with the security decree wanted by the Minister of Interior Maroni (Law No. 125 of 2008), which introduced new criminal offences for illegal migrants, for those who facilitate their illegal stay and also the criminal aggravation of clandestinity. It was followed by Law No. 160 of 2008, which restricted the possibility of family reunification and by Law No. 94 of 2009, which introduced the crime of illegal entry and stay, as well as changing the temporary stay and assistance centres into Identification and Expulsion Centres. However, the rigidity of the security packages was limited by European directives (Casella 2016).

Despite a less stringent Law No. 46 of 2017, in which international protection procedures were accelerated, the continuous changes of government have seen a constant oscillation in migration policies, as was subsequently the case with the security decrees of Interior Minister Salvini (Decree-Law No. 113 of 4th October 2018). These decrees saw the temporary abolition of humanitarian protection, as well as another set of procedures aimed at an even more restrictive turn of Italian migration policies. More recently, i.e. at the end of 2020, the Senate "dismantled" the Salvini security decrees, reintroducing, for example, humanitarian protection for asylum seekers

and relaxing legislation on the matter. To date, the only forms of migration policy implemented after the outbreak of the global pandemic, have been the 2020 *sanatoria* designed to help those sectors of the labour market in difficulty due to Covid-19, namely agriculture, domestic work and personal care.

This paragraph concludes the section on migrant presence within Italy. The next section introduces Japan and its particular migratory dynamics.

Year, Decree	Number of foreigners regularised	Government
1982, Di Giesi Law	5.000	Spadolini I
1986, Foschi Law	105.000	Craxi II
1990, Martelli Law	222.000	Andreotti VI
1995, Dini Decree	246.000	Dini
1998, Turco-Napolitano Law	217.000	Prodi I
2002, Bossi-Fini Law	647.000	Berlusconi II
2006, Flows Decree	170.000	Berlusconi III
2006, Flows Decree	350.000	Prodi II
2007, EU Enlargement	444.000	Prodi II
2009, Measures Regarding Public Safety	300.000	Berlusconi IV
2012, Legislative Decree	99.000	Monti
Total	2,805.000	

Table 2.1. Number of foreigners regularised through *sanatorie* and other legislative instruments, 1982-2012 (migrantitorino.it 2018).

2.5.3. Who are the migrants in Japan?

The data from the Ministry of Internal Affairs and Communications revealed that in 2017 foreigners in Japan were mainly from China (730.890), South Korea (450.663), Vietnam (262.405), Philippines (260.553) and Brazil (191.362) making a total of 2,561.848 foreign nationals living in the archipelago (Statistics Bureau, Ministry of Internal Affairs and Communications of Japan 2019). Prior to the pandemic, the number of foreign national residents gradually increased, albeit slowly.

In 2018, there were 2,731,093 foreign national residents (764,720 Chinese, 449,634 South Koreans, 330,835 Vietnamese, 271,289 Filipinos, and 201,865 Brazilians); whereas, in 2019, the total number of foreign nationals reached a record 2,933,137 (813,675 Chinese, 446,364 South Koreans, 411,968 Vietnamese, 282,798 Filipinos, and 211,677 Brazilians) (Statistics Bureau, Ministry of Internal Affairs and Communications of Japan 2021). In light of a general increase in entries, in 2019 the greatest increases regarded citizens of Chinese and Vietnamese origin, while citizens of South Korean origin, the historic foreign group present in Japan, experienced an albeit slight decline.¹⁶⁶ Lastly, according to the available data on foreign residents as of June 2020, the latest provided by the Immigration Services Agency of Japan, the number of foreign nationals was 2,885,904, a decrease of 47,233 units (1.6%) from the previous year (2,933,137 in December 2019), out of a total of 196 nationalities present in the archipelago. Of these, 2,576,622 were mid to long-term residents and 309,282 were special permanent residents. Men numbered 1,425,043 (49.4%), while women numbered 1,460,861 (50.4%), both declining. Of the top ten nationalities, the only increase was for the Vietnamese, who increased by 8,447 people (2.1%), while the other nine nationalities all decreased. Permanent residents reached a record high of 800,872, or plus 7,708 people (1.0%). Foreign nationals with a Technical Intern Training status, the second largest residence status, decreased by 8,550 people (2.1%), reaching 402,422 units. This residence status was followed by Engineer/Specialist in Humanities/International Services status with 288,995 units, an increase of 16,996 (6.2%). Finally, Special Permanent Resident status also declined by 3,219 (1%), for a total of 309,282. Tōkyō is the city with the highest number of foreign residents (568,665 people, 19.7% of the national total, down 4.2%) (Immigration Services Agency, Ministry of Justice of Japan 2020).

¹⁶⁶ For the chart of the main nationalities and purposes of residence in Japan, see at the end of the chapter. For more on this topic: 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

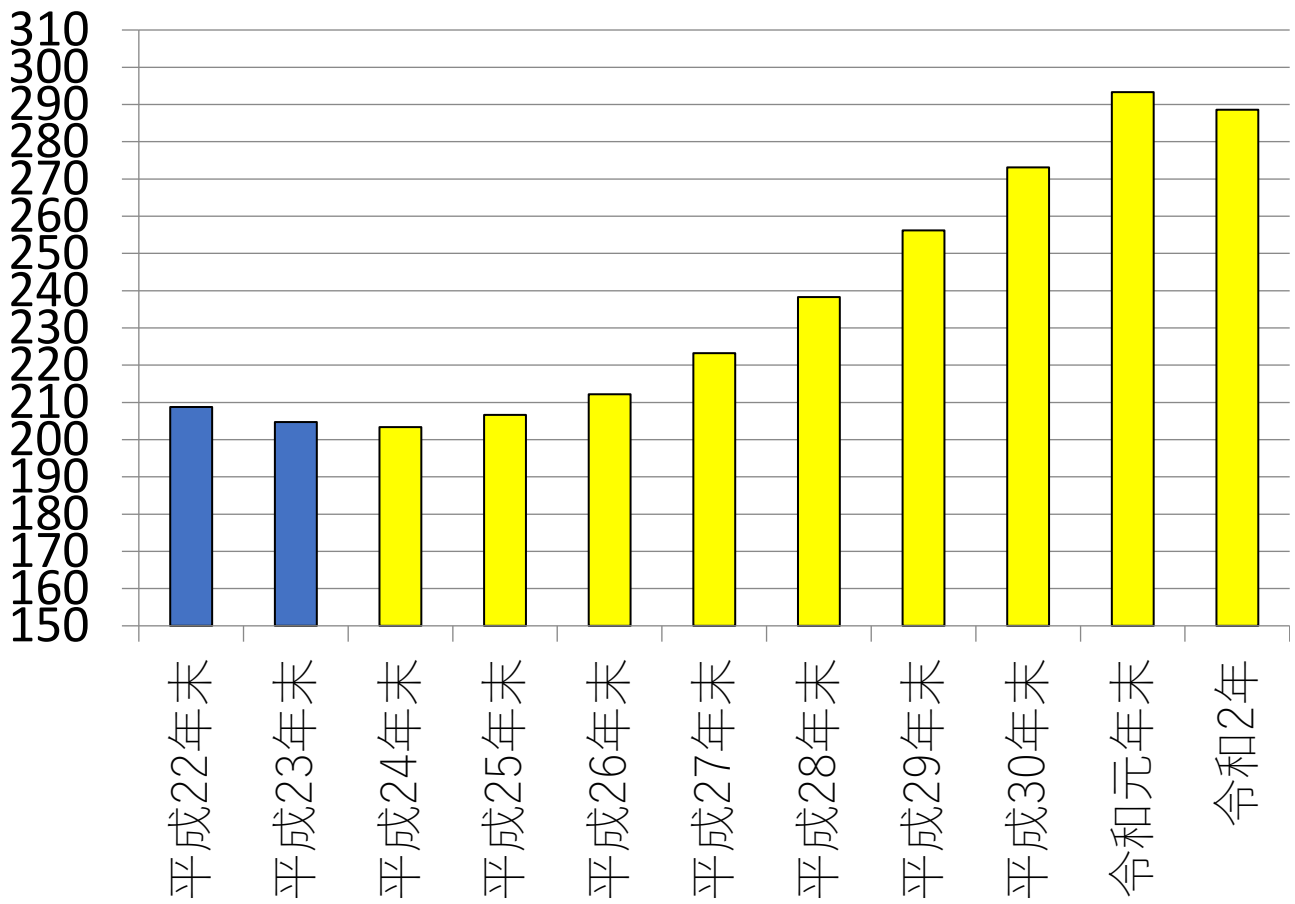


Figure 2.7. Changes in the number of foreign residents from 2010 to 2020 (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

▲Time	Number of in-migrants [person] ⓘ
2014	2,405,223
2015	2,502,780
2016	2,460,346
2017	2,505,064
2018	2,535,601
2019	2,568,086

Figure 2.8. Number of in-migrants in Japan (2014-2019). Time Series Tables (Statistics Bureau, Ministry of Internal Affairs and Communications of Japan 2021).

People's Republic of China	786,830 residents	(27.3%)	(-3.3%)
Republic of Korea	435,459 residents	(15.1%)	(-2.4%)
Socialist Republic of Vietnam	420,415 residents	(14.6%)	(+2.1%)
Republic of the Philippines	282,023 residents	(9.8%)	(-0.3%)
Federative Republic of Brazil	211,178 residents	(7.3%)	(-0.2%)
Federal Democratic Republic of Nepal	95,367 residents	(3.3%)	(-1.5%)
Republic of Indonesia	66,084 residents	(2.3%)	(-1.2%)
Republic of China (Taiwan)	59,934 residents	(2.1%)	(-7.5%)
United States of America	57,214 residents	(2.0%)	(-3.3%)
Kingdom of Thailand	53,344 residents	(1.8%)	(-2.7%)

Figure 2.9. Foreign residents in Japan in June 2020 (top ten nationalities) (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

Permanent Resident	800,872 residents	(27.8%)	(+1.0%)
Technical Intern Training	402,422 residents	(13.9%)	(-2.1%)
Special Permanent Resident	309,282 residents	(10.7%)	(-1.0%)
Engineer/Specialist in Humanities/International Services	288,995 residents	(10.0%)	(+6.2%)
Student	280,273 residents	(9.7%)	(-18.9%)

Figure 2.10. Main residence status in Japan in June 2020 (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

As can be seen from the data, the majority of migrants come from the Asian geographical area, except for Brazil due to the introduction of preferential channels for entry for *nikkeijin* of Japanese origin in 1990. China and South Korea are countries historically, economically and culturally linked to Japan. A proportion of the foreign population is still made up of Korean, Chinese and Taiwanese *zainichi*¹⁶⁷ and their descendants. Japan, like Italy, during the previous century was historically classified as a country of emigration, at least until the early seventies. In 1973, in fact, the government's discontinuity of the sponsored emigration projects to Brazil initiated in the 1920s was officially declared (Yamanaka 2003; 2010).

From a social division point of view, literature has suggested the reality of a racialised hierarchy of foreigners living in Japan. This division is based on criteria related to employment and social, civil and political rights. This categorisation appears to have been constructed in a top-down manner by Ministry of Justice officials. In a hierarchy of the "quality" of rights, the pyramid includes *zainichi*, *nikkeijin*, foreign students and English language teachers, regular Asian workers and undocumented Asian workers. Above them, all are highly skilled workers, regardless of their nationality (Shipper 2008).

The phenomenon of irregular migrant workers, although lower in numbers than the Italian case, is present in Japan, too. In 2019, there were an estimated 12,816 irregular foreign workers (66.1%) from fifty-five nations, most of which were from neighbouring Asian countries. According to the estimates made by the Ministry of Justice, the highest number of irregular workers are Vietnamese (4.941, 38.6%), followed by Chinese (3.155, 24.6%), Thai (2.047, 16.0%), Indonesian

¹⁶⁷ In Japanese 在日 (literally "Japan resident"). Citizens of Korean or Chinese origin permanently resident in Japan. The term refers mainly to citizens who have migrated from colonial territories during the period of Japanese domination of Korea, Taiwan and part of China (Japanese colonial empire, 1895-1945), and to their descendants. Most *zainichi* are of Korean origin.

(1,014, 7.9%), and Filipino (764, 6%). These five nationalities constitute 93% of the total estimated undocumented workers. As in all cases where undocumented foreign workers are present, their working conditions are among the worst in the domestic workforce, both in placement within the dualised labour market and in the parameters of pay and job conditions, like their contractual and social security (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020). Their public presence is almost nonexistent, invisible to the population and the media, and severely limited by Japan's restrictive police controls (Liu-Farrer 2020: 19).

Nationality/Region	Year	2015	2016	2017	2018	2019
	Total		7,973	9,003	9,134	10,086
	Male	5,167	6,093	6,120	6,754	8,903
	Female	2,806	2,910	3,014	3,332	3,913
Viet Nam		1,160	1,638	2,152	3,035	4,941
	Male	873	1,246	1,657	2,259	3,766
	Female	287	392	495	776	1,175
China		3,266	3,080	2,915	3,112	3,155
	Male	2,166	2,130	1,982	2,170	2,188
	Female	1,100	950	933	942	967
Thailand		1,215	1,536	1,855	1,868	2,047
	Male	699	850	966	903	1,035
	Female	516	686	889	965	1,012
Indonesia		396	819	588	594	1,014
	Male	338	699	514	498	827
	Female	58	120	74	96	187
the Philippines		756	830	711	660	764
	Male	341	426	366	369	398
	Female	415	404	345	291	366
R.O. Korea		435	359	239	169	163
	Male	167	167	118	69	76
	Female	268	192	121	100	87
Nepal		68	95	77	71	111
	Male	51	76	52	52	92
	Female	17	19	25	19	19
Mongolia		81	133	146	117	91
	Male	51	90	95	70	61
	Female	30	43	51	47	30
Sri Lanka		57	68	53	42	87
	Male	54	67	48	41	81
	Female	3	1	5	1	6
Uzbekistan		5	11	7	35	65
	Male	5	11	7	34	64
	Female	—	—	—	1	1
Others		534	434	391	383	378
	Male	422	331	315	289	315
	Female	112	103	76	94	63

Figure 2.11. Changes in the number of cases of illegal work by nationality. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

Job Categories	Year	2015	2016	2017	2018	2019
	Total		7,973	9,003	9,134	10,086
	Male	5,167	6,093	6,120	6,754	8,903
	Female	2,806	2,910	3,014	3,332	3,913
Agricultural worker		1,744	2,215	2,501	2,504	2,904
	Male	1,113	1,438	1,585	1,480	1,646
	Female	631	777	916	1,024	1,258
Construction worker		1,638	1,713	1,548	1,835	2,569
	Male	1,622	1,697	1,529	1,818	2,550
	Female	16	16	19	17	19
Factory worker		1,342	1,410	1,411	1,875	2,454
	Male	857	1,008	942	1,236	1,686
	Female	485	402	469	639	768
Other labor worker		686	1,076	1,059	998	1,380
	Male	543	837	811	794	1,089
	Female	143	239	248	204	291
Worker in other service industry		425	453	495	589	647
	Male	118	127	152	213	268
	Female	307	326	343	376	379
Cook		218	182	182	205	299
	Male	140	124	115	162	202
	Female	78	58	67	43	97
Others		1,920	1,954	1,938	2,080	2,563
	Male	774	862	986	1,051	1,462
	Female	1,146	1,092	952	1,029	1,101

Figure 2.12. Changes in the number of cases of illegal work by type of work. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

Unlike the Italian case, foreign workers cannot officially occupy the lowest segmentation of the domestic labour market because, formally, there is no migration directed at low-skilled workers.¹⁶⁸ To explain this situation and give greater clarity to the terms used so far, a brief explanation of the history of Japanese migration policies is necessary. This section will also describe more in depth the topic of the new migration law introduced in Japan in 2018.

2.5.4. Japanese migration processes and policies: a brief historical outline

¹⁶⁸ With a few exceptions, like the *nikkeijin*, trainees, technical interns and foreign students (Yamada 2010).

The history of Japanese migration and migration policies can basically be divided into two parts, the first phase prior to World War II and the second phase from the period immediately following the end of the second world conflict to the present day.

In relation to immigration dynamics, before the Second World War we may distinguish between three distinct phases: from 1859 to 1899, in which the presence of foreigners in the Japanese archipelago was limited and controlled by the *shogunate*¹⁶⁹ authorities and later by the Meiji government; from 1899 to 1939, in which the areas exclusively designated for foreigners were abolished (during this period Westerners obtained permission to live and work on Japanese territory); from 1939 to 1945, when the Japanese government actively encouraged the recruitment, through the mediation of large *zaibatsu*,¹⁷⁰ of Chinese (Taiwan) and Korean labour from the imperial colonies (from 1941, workers from northern China were also included, thus not limiting recruitment to areas near the archipelago) (Yamawaki 2003).

More articulated and relevant are the events concerning Japanese migration policies since the end of the Second World War. First, it is necessary to mention the category of Korean and Chinese *zainichi*. *Zainichi* are generally citizens of Korean and Chinese descent (including their Japanese-born descendants) who decided not to be naturalised after the fall of the Japanese Empire. More precisely, they are part of that group of Korean and Chinese citizens who, after the annexation of Formosa Island (Taiwan) to the Japanese Empire in 1895, the Kingdom of Korea in 1910, and later parts of North China, migrated to Japan as workers voluntarily (or forcibly), and remained even in the subsequent period (Lie 2008: ix-xiv; Shipper 2008: 27). These former colonial subjects (particularly Koreans), constituted the numerically largest group of foreign residents in Japan until 2007 (Shiobara 2020: 25). The peculiarity of these ethnic groups is that with the signing of the San Francisco Peace Treaty in 1951,¹⁷¹ they saw the transformation of their status from fully fledged Japanese citizens to mere foreign nationals (Fielding 2016: 197).¹⁷² In fact, from that moment they

¹⁶⁹ The shogunate, in Japanese *bakufu* (幕府), denotes the rule of the *shōgun* (将軍), or hereditary military dictator, of Japan from 1192 to 1867. Legally, the *shogunate* was under the control of the emperor, and the *shōgun*'s authority was limited to control of the country's military forces. However, the increasingly feudal nature of Japanese society created a situation in which control of the military became equivalent to the entire country's control, and the emperor remained in his palace in Kyōto primarily as a symbol of sovereignty (Encyclopaedia Britannica 2020a).

¹⁷⁰ *Zaibatsu* (in Japanese 財閥) were vertically integrated business conglomerates during the Japanese imperial period (1868-1947). They were dissolved at the end of World War II by the Allied occupation forces, only to be reconstituted as *keiretsu*.

¹⁷¹ The signing took place on 8th September, 1951, while the Treaty actually entered into force on 28th April, 1952.

¹⁷² In fact, the process of transforming their status began in 1947, when the Alien Registration Act was established. This law formalised the transition of former colonial subjects from subordinates of Japanese imperial rule to fully fledged foreign citizens, and actually came into effect in 1952 with the San Francisco Peace Treaty.

were forced to submit to the Immigration Control Order of 1951¹⁷³ and the subsequent Immigration Act of 1952¹⁷⁴ (Koudela 2019: 94), which forced them to choose between naturalisation through an "informal" practice, i.e. adopting a first and last name written in Japanese characters (effectively giving up their own name altogether), or whether to remain in Japan with a different status than that of natives.¹⁷⁵ As a result of the particularity of their presence in Japan, which created a short-circuit in the social composition of the country, they were granted "permanent residency status" in 1965 following the entry into force of a bilateral agreement between Japan and South Korea, which was modified in 1991 into "special permanent residency status" (Kashiwazaki 2013). However, this differentiation is still present today, making Japan the only developed industrial country where problems related to fourth-generation "immigrants" occur (Chung 2010).

Returning back to the history of immigration in Japan, from a legislative standpoint there were no major changes from 1945 until the early 1980s. In fact, despite rapid economic and industrial growth in the early postwar years (Burgess 2020), and a manufacturing transformation described as "miraculous" from the 1970s, unlike most economically advanced countries Japan had not made use of foreign workers (Burgess 2020). From this perspective, according to Bartram (2000: 15), Japan is a "negative case" or a "significant anomaly" compared to other highly industrialised countries, while Vogt (2013) called it an "outlier," an anomaly in the international landscape.¹⁷⁶ In support of this viewpoint, throughout the 1960s and 1970s, Japan's Cabinet¹⁷⁷ had repeatedly passed resolutions against the entry of foreign workers (Hamaguchi 2019a: 2), denoting a clear political hostility towards bringing in labour from outside the country.

The one exception had been the handling of the crisis of the "Boat People," Indochinese asylum seekers who arrived in the archipelago in 1975 (Kawakami *et al* 2009: 13-16). This fact prompted the Tōkyō government to reformulate its refugee policy in order to accept exiles from Vietnam, Laos, and Cambodia. In 1981, the Japanese government signed the 1951 Refugee Convention and the 1967 Refugee Protocol, thus revising its domestic legislation on the issue and

¹⁷³ The future Immigration Control and Refugee Recognition Act, or ICRAA.

¹⁷⁴ Act No. 125 of 1952, Alien Registration Act.

¹⁷⁵ This practice remained in place until 1985 (Chung 2014: 414-415).

¹⁷⁶ In this regard, Muller (1993) stated that "*Japan is the prime example of a technologically advanced nation that depends on its own population for nearly all of its workers...Japan's ability to maintain a high living standard with virtually no dependence on immigrant labor reflects some distinctive aspects of Japanese culture, religious philosophy, and nationalism*" (Muller 1993: 287-288, in Douglas, Roberts 2003: 19).

¹⁷⁷ In Japanese *Naikaku* (内閣).

resulting in at the beginning of the first political debate and public discussion on the issue of immigration (Akimoto 2021).¹⁷⁸

From this moment, however, began a slow, unprecedented phase that saw the emergence of new migratory flows to the Japanese archipelago. The first was that of Asian "entertainers" (especially of Filipino origin). This particular migration flow, which began at the end of the seventies and stabilised in 1996, was characterised by an increase in the number of *de facto* workers in the Japanese sex industry, however without creating a great stir in public debate. Their numbers began to be substantial, especially after the 1990 ICRRA amendment (Brody 2002; Douglass 2003; Weiner 2003; Shipper 2008). The second migratory flow, on the other hand, although not relevant from a quantitative point of view, was relevant in terms of symbolic importance. It was, in fact, a process that began in the mid-1980s, composed mainly of irregular workers (men) from various South and Southeast Asian countries, such as South Korea and China, and some Middle Eastern countries such as Iran, Pakistan and Bangladesh (Sellek 1996). Their arrival took place through a "back door", an anomaly to the entry system of the country, either through the use of tourist visas (and subsequent stay beyond the limits granted by it), or through illegal channels managed by the domestic criminal underworld, the *yakuza*, and the international one (Brody 2002).

The difference, with respect to the case of "entertainers", was that the second migratory flow was more "visible" as these workers used to meet in public spaces such as large urban parks. Moreover, according to Lie (2001), the social visibility of such racially diverse workers represented a potential threat (albeit largely symbolic) to the prevailing notions of Japan as an ethnically homogeneous society (Lie 2001, in Burgess 2020). It was in these years¹⁷⁹ that the structural dynamics that still identify Japan today began to emerge: an ageing population, an extremely low birth rate, a growing labour shortage linked to the shrinking of the indigenous labour pool, young people no longer willing to work in fields considered humble and consequently not very prestigious, an industrial system dominated by small and medium-sized companies with the constant need to cut labour costs, and, lastly, significant changes in lifestyles, family patterns and working styles (especially for women). The arrival of this second group of foreign workers was the first response to these needs, which had become structural, and developed as a consequence of a certain passivity on the part of the government in dealing with these problems.

¹⁷⁸ However, Japan is notorious for its low annual rate of refugee status recognition. For example, in 2018 only 44 applicants were granted status, while in 2019 42 applicants were granted status (out of a total of over 10,000 applications in these two years). The recognition rate has been less than 1% since 2012 (Ministry of Justice of Japan 2019; Japan Association for Refugees 2021).

¹⁷⁹ These are the years of the so-called Heisei boom (1986-1990), an important moment of economic growth, following and of equal magnitude to the Izanagi boom (1965-1970). During the Izanagi boom, Japan became the world's second largest economic power (1968).

The turning point in Japanese migration policies came in the late 1980s, in particular with the 1989-1990 revision of the Immigration Control and Refugee Act. The context was that of the bubble economy, the period of incredible economic growth that Japan experienced from 1986 to 1991. As mentioned in the first chapter, the lack of manpower to meet the needs of certain sectors, particularly manufacturing and construction, had become a pressing political and economic issue at the time.¹⁸⁰ There was a particular need for flexible, low-cost, low-skilled workers that could no longer be found among Japan's young graduates (Brody 2002). The ensuing debate pitted proponents of international openness (or *kaikoku*)¹⁸¹ and conservatives for closure (or *sakoku*)¹⁸² against each other (Brody 2002: 37-40).

After the failure in 1988 of a proposal by the Ministry of Labour (now the Ministry of Health, Labour and Welfare, MHLW) for a pre-employment work permit system, policy debate led to the 1989 revision of ICRRA¹⁸³ by the Ministry of Justice, providing second- and third-generation descendants of Japanese citizens who had emigrated to Brazil, Peru and other South American countries (the so-called *nikkeijin*) with residency status as "permanent residents",¹⁸⁴ without any restrictions on their right to work. This created a *de facto* "side door" that made cheap, low-skilled foreign labour available to economically struggling companies, especially those in industries belonging to the 3Ks (Hamaguchi 2019a: 2). Moreover, this solution was the necessary compromise in order to preserve the ethnic and cultural homogeneity that only the *nikkeijin* possessed through their direct blood ties to Japanese ancestors (Sellek 1996: 202; Koudela 2019: 5).

Finally, the revision of ICRRA allowed for the creation of an additional "side door" through the introduction of "trainee" status. Then, in 1993, the Technical Trainees and Interns Program

¹⁸⁰ This was particularly evident in labour market areas belonging to the so-called 3Ks (*kitanai*/汚い, *kiken*/危険, *kitsui*/きつい, corresponding to the American 3Ds, "dirty," "dangerous," and "demanding") (Brody 2002: 3; Shipper 2008: 44). Jobs that fall under the 3Ks are generally associated with "blue collars" and foreign workers.

¹⁸¹ In Japanese 外国, literally "opening up the country." This view was particularly supported by the Ministry of Foreign Affairs (MEXT).

¹⁸² In Japanese 鎖国, literally "closing the country". It is a policy directed at closing domestic borders that has been practiced several times throughout Japan's history. The Ministry of Justice (MOJ) was its biggest proponent.

¹⁸³ Officially went into effect in 1990 (Burgess 2020).

¹⁸⁴ In Japanese *teijūsha* (定住者), long-term but not permanent residency status. The *nikkeijin* could also bring their family members (Endoh 2019: 327). Moreover, the purpose of granting this specific status was to differentiate and counterbalance the special permanent resident status attributed to Korean and Chinese *zainichi*: the Japanese government opted to highlight this specific difference by emphasising that the formers were "almost" Japanese due to their descent, while the latter represented a category of "special" foreigners (Shipper 2008: 37).

(TITP)¹⁸⁵ was established to help transfer and then acquire technical skills for specific developing countries in Asia. The programme saw an extension of the period of stay as a "trainee" and added the figure of the "technical intern". The former was not considered a real worker, while the latter was. The duration of the programme was initially two years, later to become three in which there was an alternation of study and direct on-the-job training. However, this division was often unclear, as it was actually work disguised as vocational training. In 2009, the status of "technical intern" was recognised as residency status but failed to address the problems and criticisms directed at TITP up to that point (Hamaguchi 2019a: 2-3). Thus, contrary to initial intentions, the programme turned out to be a fully fledged guest worker system (similar to the German *gastarbeiter* model), repeatedly criticised nationally and internationally for being plagued by numerous structural deficiencies and a conspicuous number of human rights violations (Burgess 2020).

In 2016, the government passed a new law regarding the proper implementation of this programme and more adequate protection for technical interns (Technical Internship Act), increasing the scope for residency in Japan and the number of work sectors involved in it (including, for example, nursing and care). In fact, the law stipulates that at the end of the three-year internship it is possible to renew the project for a further two years, however with the obligation of return to the country of origin before renewal. The duration of the programme has been fixed at five years, with greater and more rigid regulations, but with the persistence of strong limitations due to the impossibility of changing the firm during the entire period of the project. This rigidity led to an increase in the phenomenon of technical interns leaving the programme to enter the labour market as undocumented workers (Hamaguchi 2019a: 3).

Ultimately, the combination of these "side" and "back" doors allowed the Tōkyō government to procure an inexpensive and flexible foreign labour force while avoiding the creation of a true immigration policy (Endoh 2019: 327). Despite this solution, these various initiatives proved insufficient to solve the structural problems of the Japanese labour market: *nikkeijin* were "unsuccessful" from the perspective of social and ethnic integration, as they were too different from the Japanese and considered difficult to assimilate into society. Therefore, the "*nikkeijin* project" could actually be considered a failure (Koudela 2019: 95), as their identity is still almost solely tied to South American culture (Tsuda 1998), and even the fourth generation present in Japan often only speak the language of their parents and still experience serious problems from the perspective of employment and education (Chitose 2009: 22; Chapple 2014); the trainee and technical intern

¹⁸⁵ In Japanese *Ginō Jisshū Seido* (技能実習制度), also internationally known as the Technical Intern Training System (テクニカルインターントレーニングシステム).

system, though it has seen an expansion in both duration and areas of work, has never been able to extricate itself from national and international criticism regarding labour exploitation and human rights violations that have characterised it over the decades, as well as being a mere means of importing cheap labour for menial jobs, with little actual technical knowledge passed on to the worker. There have also been numerous documented cases of trainees being paid below minimum wage and working long hours and in unsafe conditions (Green 2017). These two groups of workers, moreover, were the first to be unemployed during times of recession and economic crisis, such as during the 2008 economic crisis,¹⁸⁶ the Tōhoku earthquake (and subsequent Fukushima nuclear disaster) of 2011 (Endoh 2019: 327-328), as well as the current Covid-19 pandemic crisis.

2.5.5. The 2018 amendment to the Immigration Control and Refugee Recognition Act: substantive changes and resilience of differentiating social dynamics

In 2012, the Japanese government introduced a points system for highly qualified foreign professionals, similar to the U.S. Green Card model. Under this principle, those who pass a certain score based on academic qualifications, professional experience, and other similar factors can receive preferential residency status. In 2017, the period of residence required for permanent residency was reduced to three years for applicants scoring 70 points or more and one year for applicants scoring 80 points or more (Hamaguchi 2019a: 3).

These fast lanes are the starting point of Japan's differentiating migration policies. They do not actually turn out to be anything new. In fact, they are part of that race to obtain highly skilled workers with advanced technical skills in a broader context dominated by global competition for advanced human resources (Hamaguchi 2019a: 3). Thus, the clear preference for this specific type of worker and the pro-active efforts to obtain them should come as no surprise. Between 2003 and 2018, thanks to these favourable conditions, the presence of high-skilled workers in Japan nearly doubled (Endoh 2019: 329).

What was instead surprising was the (historic) revision of the ICRRRA that took place on 8th December 2018, which introduced an absolute novelty into the Japanese migration framework: for the first time in contemporary Japanese history, blue-collar workers are allowed to enter the archipelago (with the subsequent activation of two new residency statuses linked to it). This amendment brought about a major shift in the policies of the Tōkyō government, officially

¹⁸⁶ A pay-to-go scheme was even implemented between 2009 and 2010 in which the government offered cash payments to incentivise *nikkeijin* to leave Japan (Green 2017).

accepting not only highly skilled workers, but also low- and medium-skilled workers (Shiobara 2020: 22-23). This time not through the opening of side or back entrances as was the case with the *nikkeijin* in the 1990s or for the TITP system,¹⁸⁷ but a true official corridor for the entry, and partial stay, of foreign labour force that is not (only) highly skilled.

However, the process that led to the approval of the revision of the ICRRA was long and tortuous. Summing up what happened in 2018, in February Prime Minister Abe Shinzō proposed, during a meeting of the Council for Economic and Fiscal Policy (CEFP), Japan's highest economic advisory committee, an amendment to the ICRRA aimed at changing the structure of the entry of foreign workers. The proposal concerned the possibility of accepting medium-skilled workers in specific labour market sectors, diversifying (while maintaining strong limitations) residency statuses and basically prohibiting the possibility of being accompanied by family members. This proposal was in response to the structural needs of medium and small (as well as micro) businesses, challenged by the constant problem of the lack of low-cost, low-skilled labour. Following a June 2018 deliberation by a Japan Cabinet task force which was created *ad hoc* to address this issue, and which proposed a structural change as part of the government's "Basic Policy on Economic Management, Taxation, and Reforms", in November a new bill was submitted to effectively amend the ICRRA (Hamaguchi 2019a: 3). Finally, the revision was enacted at 4 a.m. on 8th December during the 197th National Diet (Law No. 102, Heisei 30), not without controversy from the opposition,¹⁸⁸ to actually take effect in April 2019 (Burgess 2020). With it, the National Immigration Control Agency, Japan's Immigration Bureau, was also reformed, granting it greater jurisdiction than its conventional task of simply controlling the immigration process and residence status of foreigners (Endoh 2019: 325).

The government's chief secretary and main architect of the new immigration policy, Suga Yoshihide (former Prime Minister of Japan after Abe), directed all phases of this legislative amendment for the selective acceptance "*of foreign workers with skills needed for industrial areas with difficulties in securing labour and manpower*", namely "the Law to Amend a Part of the Immigration Control Law, Recognition of Refugee Status, and Establishment of the Ministry of Justice" (Kubo *et al.* 2018).

¹⁸⁷ Foreign students, who may work up to twenty-eight hours per week, should also be added to the group of low-wage, low-skill workers employed in the 3K sectors (Burgess 2020).

¹⁸⁸ For example, the review has been called a "*carte blanche*" (Urano *et al.* 2018; Burgess 2020). There has also been no shortage of controversy within the majority party, the Liberal Democratic Party (LDP), which is internally divided on the issue (Jiji.com 2018). Finally, it has also aroused criticism for the timing of the deliberation of the revision, less than thirty-eight hours between the Upper and Lower Houses (Endoh 2019: 330-331).

Essentially, the new version of the law establishes two new residency statuses, *Tokutei Ginō Ichi Gō* (Specified Skilled Type 1) and *Tokutei Ginō Ni Gō* (Specified Skilled Type 2). The former refers to individuals who possess a predetermined level of skills so that they can be placed immediately into specific job areas without having to obtain further *ad hoc* training. The assessment of these skills must take place through the supervision of the relevant ministry about the precise industry. This status actually turns out to be an almost mechanical continuation of the TITP, as technical interns who have completed the second phase of their internship project are exempt from this examination (Hamaguchi 2019a: 4). The difference between this and TITP is that type 1 status, which provides coverage of more job sectors,¹⁸⁹ will see workers hired directly by employers, even allowing them to change jobs. Fundamentally, rather than an actual new migration law, the *Tokutei Ginō Ichi Gō* turns out to be a further extension of TITP and a further formalisation of this system of guest working disguised as a period of vocational training (Burgess 2020). The stay limit for this visa is five years, with no possibility of having family members coming with the worker.¹⁹⁰ The labour market sectors involved are mostly labour-intensive (eleven out of fourteen), already currently supported by trainees and students (Endoh 2019: 331).

The question regarding status type 2 is different. Here, too, the binary differentiating process typical of the Japanese context comes into play. Indeed, this new status is targeted at highly skilled foreign workers,¹⁹¹ specifically those who are able to pursue advanced professional or technical tasks through their own judgment or who are able to supervise and successfully complete tasks as supervisors. They have no limits on renewing their period of residency and can bring their family with them. This typology seems to possess more of the quality of a true new migration policy (Hamaguchi 2019a: 4).

However, in the face of criticism that it was actually a migration law, the government partially did a U-turn by tightening the initial conditions and limiting the number of labour market sectors, stressing that visa renewals would not be automatic and subject to periodic checks and reviews. This clarification makes status type 2 certainly more similar to a new migratory scheme, but very close to what happened in the case of *nikkeijin* in terms of job (in)security and the possibility of permanence in the archipelago. In short, it turns out to be another "side door" for low-

¹⁸⁹ Fourteen in total, namely nursing, housing, food services, building cleaning, food production, fishing, agriculture, construction, shipbuilding, auto maintenance, aviation, forging technology, industrial machinery, and electronics (the first three started in April 2019, the others at the end of March 2020) (Immigration Services Agency of Japan, Ministry of Justice of Japan 2019). For more on this topic: 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

¹⁹⁰ If added to the TITP period, this time spent in Japan adds up to a total of ten years of being in the country without the possibility of reuniting with the worker's family (Hamaguchi 2019a: 4).

¹⁹¹ There are only two expected labour market sectors for this status, construction and shipbuilding (Immigration Services Agency of Japan, Ministry of Justice of Japan 2019).

/medium-skilled workers, without the limitation of ethnic connotation (Burgess 2020). Moreover, it is still in a stalemate, as no company seems to be interested in pro-actively looking for this category of workers (Endoh 2019: 332).

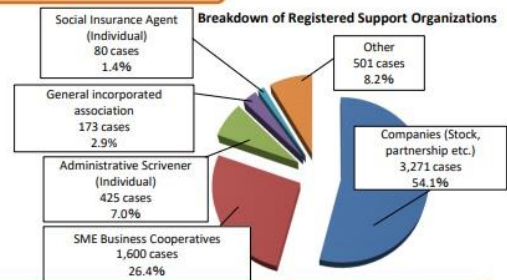
In fact, due in part to the Covid-19 pandemic, the results of the 2018 ICRRRA amendment are currently weak and uncertain, as well as difficult to assess. The goal of the now former Prime Minister Abe was to reach the number of 345,150 foreign workers from nine Asian nations within five years from April 2019, the month that the ICRRRA amendment was activated. Japan's Immigration Services Agency reported that the number of status type 1s active at the end of March 2021 was 22,567, 5.6 times higher than in 2020, but still below government expectations. Moreover, the majority of them came from TITP (19,092, or 84.6% of the total), demonstrating continuity with it (The Yomiuri Shimbun 2021). As for type 2 status, on the other hand, it does not yet appear to be active.

Ultimately, as much as the changes introduced by the latest ICRRRA amendment might have been a turning point with respect to Japan's continued recalcitrance to migration policies that address the structural needs of the Japanese labour market, the expected results are still stuck in limbo, exacerbated by the current economic and health crisis.

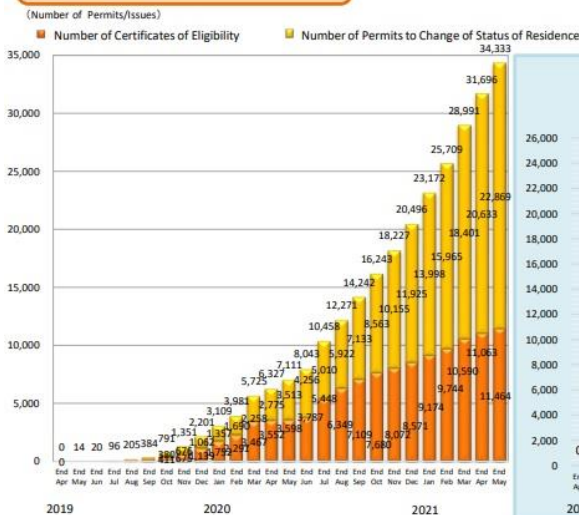


Status of Specified Skilled Worker Permits (as of the end of May 2021; preliminary)

- ① Issue of Certificate of Eligibility **11,464 cases**
- ② Permission to Change of Status of Residence **22,869 cases**
- ③ Registration of Registered Support Organization **6,005 cases**



Breakdown of Permitted Cases



Number of Specified Skilled Workers Residing in Japan (as of the end of May 2021; preliminary)

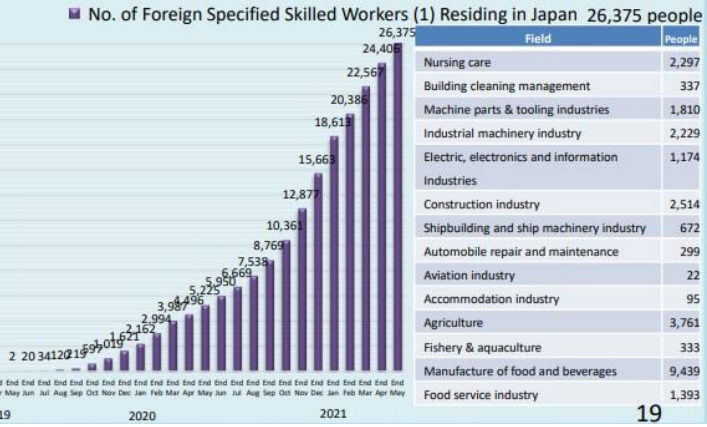


Figure 2.13. Operation Status of Specified Skilled Worker System and Breakdown of Permitted Cases (Immigration Services Agency of Japan, Ministry of Justice of Japan 2021).

Part 2.

2.6. Industrial Relations and the Role of the Tripartite System in the Current Migrant Workers Situation: *concertazione*¹⁹² vs. advisory councils

The role of national industrial relations actors in determining national migration conditions can differ widely shaped by various factors. The same applies to current migration policies. Within the same national system and its labour market, the state, trade unions and employers' associations¹⁹³ have different interests and represent distinct jurisdictions.

¹⁹² In Italy, *concertazione* refers to a government practice that tends to make economic choices through prior consultation with the social partners, mainly trade unions but also trade associations or those belonging to the third sector. It can be translated as "public consultation".

¹⁹³ These three parties, known as "social partners" in some Western countries, are the representatives of three sets of actors, respectively the state (representing itself), workers and employers. The relationships linking these three parties are determined by three environmental contexts, namely market forces, technology, and the relative power and status of

First of all, industrial relations are defined as "*the set of relations, mainly contractual but not solely, in which trade unions and employers' associations are involved as actors, but also as representative bodies*" (Cella, Treu, 2009: 11).¹⁹⁴ They are joined by the state through trilateral negotiations, in which the latter may have a greater or lesser degree of intervention (Cella, Treu 2009).

Industrial relations, also identified as employment relations (i.e. they may contain both industrial relations and human resource management processes), go beyond labour regulation alone, although this is one of its fundamental features. They take a broader spectrum of economic and social influences on the balance of power between labour and capital into account, as well as interactions between the state, individual workers, trade unions, employers, employers' associations and broader confederations representing parts or whole industrial sectors (Bamber *et al.* 2004b: 1). Such a complex relational network has, over the years, required the application of a multidisciplinary approach involving different academic fields, including economics, political science, sociology, psychology, law, history, etc., to better understand its complexity and analyse it properly (Bamber *et al.* 2004b: 1).¹⁹⁵

Regarding the specificities of the countries under consideration, in Italy trade unions are represented mainly by industrial unions, as in many other continental European countries (Rebick 2005: 13; 23). They focussed precisely on "industry", or "trade". Class solidarity is another distinctive feature of Italian industrial relations, despite the internal ideological division into three major trade union confederations.

Differently, because the clear majority of labour¹⁹⁶ unions in Japan are enterprise unions, Japanese industrial relations and enterprise union functions are largely dedicated to decision-making and coordination processes within the company (Gordon 1998). This denotes a system very similar to the German *Betriebsrat*, i.e. works councils, delimiting a participatory orientation of Japanese collective labour relations. The characteristics of this type of labour-management relation are the coexistence of the "organisation" and "participation" on the part of the trade unions, similar to the Swedish model (Hamaguchi 2021a: 13-14). However, this definition of the Japanese model is only partly true. It can only be valid at the macro level in the major enterprises (thanks also to the typical characteristics of cooperative labour-management relations), whereas in SMEs and micro-

the parties. The output of this system is determined by the network of rules that governs pay and conditions in the workplace. This conceptual framework is known as Dunlop's (1958) "industrial relations system". Although not without criticism and attempts at refinement, it is considered an accepted general theory (Bamber *et al.* 2004b: 8-9).

¹⁹⁴ Author's own translation.

¹⁹⁵ Industrial relations have been defined as "*both an interdisciplinary field and a separate discipline in its own right*" (Adams 1988, in Bamber *et al.* 2004b: 1)

¹⁹⁶ For the Japanese case, usually "labour union" is used as an English language term (instead of "trade union").

enterprises such processes are almost non-existent, characterised instead by a market-oriented individual labour relations model close to that of the United States (Hamaguchi 2021a: 14; Brown *et al.* 1997). This reality puts the confederal organisation of trade unions and employers' associations into a weak position in the field of industrial relations, limiting its general scope and emphasising bargaining mainly within the individual enterprise.

The industrial relations systems of Italy and Japan differ fundamentally in their policy-making structure. Although it has been transformed over time, it was made up of different premises determined by the different union system, its history, the different interaction between labour, management and government, the different political configurations of government and, above all, the different power relations (e.g. the tension between the power resources of the institutional actors (Korpi 2006), cross-class coalition systems or the Japanese micro-corporatism system (Goldthorpe 1984: 340)).

To sum up, the Italian system of labour policymaking is characterised by tripartite public consultation ("*concertazione*"), an institution that has seen alternating phases linked to the strength of the trade unions and the positions of the government, and which is slowly becoming weaker and weaker. The Japanese labour policymaking system, on the other hand, revolves around the weakness and fragmentation of the labour union arrangement, relegating most of the decisions to deliberations within the advisory councils¹⁹⁷ of the Ministry of Labour (Watanabe 2014: 8). This was particularly true from the 1980s, until the slow but inexorable decision-making limitation of the labour side from policy-making processes in the following decades.¹⁹⁸

¹⁹⁷ In Japanese *shingikai* (審議会).

¹⁹⁸ The traditional Japanese policy-making process of the 1980s, and the distribution of power between employers and labour, was based on the presence of advisory councils within each ministry. Labour policy-making referred to the advisory council of the Ministry of Labour. These councils were composed of members of the political representation (LDP), bureaucrats (public representatives) and interest groups, including employer representation, sector representation, trade unions, social actors or other forms of association, constituting the so-called "iron triangle" of Japanese policy-making process (and industrial relations). This process was primarily based on tripartite policy deliberation. Bureaucrats generally prepared drafts, then engaged in dialogue with the other members, and finally the LDP, once they had reviewed the drafts, brought them before the Diet. The role of the bureaucrats was also to guide negotiations between representatives of labour, capital and government. Although advisory councils had been a bulwark against neoliberal pressures and one of the most important forms of labour consultation, they changed shape in the mid-1990s through the neoliberal transformation imposed by Prime Minister Koizumi's government. Policy-making had transformed from a bottom-up consensus-based form to a top-down and adversarial form, in which the consultative part was weaker. After the introduction of the Deregulation Committee in the same years, which bypassed advisory councils and was composed of employers, labour scholars, lawyers and economists, the labour side was stripped of almost all of its representative powers (Ido 2013: 140-145; Watanabe 2014 8-9; 48). Labour permanently lost its representativeness in advisory councils in 2001, losing its veto power: the Cabinet Order mandated that only the presence of two-thirds of members was required to hold a meeting, *de facto* bypassing the need for labour representatives to be present in order to deliberate (Watanabe 2014: 68). Finally, again in 2001, the Koizumi government introduced the Council for Regulatory Reform, the *Sōgō Kisei Kaikaku Kaigi* (総合規制改革会議), totally excluding labour unions from the policy-making process, even from the Deregulation Committee (Watanabe 2014: 75).

Concerning migration, trade unions are often the first institution close to migrant workers, who may be placed in social environments and labour markets that can be alien and even hostile to them. The state, in turn, is the institution that regulates the entry of foreigners into the country through its legislative and regulatory functions. It can also act as a filter, deciding, at least partially, who is wanted and who is not. Employers' associations respond to other inputs, associated with the needs of the business/capital and the production needs of their representatives. These processes and needs may vary over time, according to a multiplicity of variables.

2.6.1. State and governments

Regarding migrant workers and the labour market, one of the roles of the state is to regulate national migration policies. The Italian and Japanese states also have distinctive roles in economic regulation and policy-making. The state can be seen simultaneously as a provider of the employment relations' national framework, but also as an actual employer. Finally, it has a leading role in tripartite relations with unions and employers' associations in agreement- (and policy-)making.

In the Italian case, the state has traditionally had a broad involvement in the areas just described, as well as a deep-rooted tradition of direct intervention (Chiesi 2013: 68). Despite a history in the second half of the last century full of political corruption scandals, especially linked to the long presence on the political scene of the Democrazia Cristiana (The Christian Democratic Party, or simply DC) and of a more general clientelistic system constituted by patronage and different spheres of influence and support, state involvement in the field of employment relations and tripartite relations is still important. The different government formations and political orientations have also determined their role in absolute and relative weight with trade unions and employers' associations.

The relationship between state, trade unions and employers' associations, although cyclically conflictual, have often had a cooperative orientation. Although state and management have more often maintained close relations (especially in the form of Confindustria), the Italian state has been a supporter of tripartism, seeking to limit political and industrial conflict and often pursuing approval from labour and capital before the legislation stage (Negrelli, Sheldon 2004). Its role remains that of appeasing conflictual tendencies in bargaining levels and scope shifts, especially

during economic and political crises, through social pacts and the use of centralised bargaining power (Negrelli, Sheldon 2004: 171-172).

In Japan, the state has traditionally taken a central role in managing the national economy since the beginning of the Meiji era (1868). During the economic reconstruction following World War II, the state, formed by several Liberal Democratic Party (LDP)¹⁹⁹ governments and various government bureaucracies, with the help of Japanese business, began a process of rapid industrialisation through trade protection practices and export-led growth (Gilpin 2001). However, the Japanese governmental system is characterised by a strong power fragmentation of its bureaucracy,²⁰⁰ with each bureaucracy's office being independent of the others.²⁰¹ This independence has led bureaucratic representations having very different positions on the same issues. The lack of a strong central executive to regulate disputes has created numerous coordination problems. Nonetheless, the Japanese government also plays a leading role in industrial policy, particularly in its quest for egalitarian distribution of policies and resources to protect small and medium-sized companies from market and neoliberal pressure. This is especially true in its role as a mediator and regulator between labour and capital, as a facilitator in conflict resolution, and in its "clientelist" strategic aid to specific sectors and companies through the application of selective subsidies (Dore 2013a; 2013b: 33-34).²⁰²

As described in Chapter I, the entire Japanese-style model of capitalism, with the adoption in 1955 of a political-economic stance that was part of the embedded liberalism model and the foundation of the Liberal Democratic Party,²⁰³ was based on the heavy presence of the state in the market through the adoption of comprehensive industrial and distributional policies (Ruggie 1982). These were features with much earlier historical roots, established in the 1940s. The consequences today are of a strong direct presence of the government in the market (even if to a lesser extent with

¹⁹⁹ In Japanese, Jiyū-Minshutō (自由民主党), abbreviated to Jimintō (自民党).

²⁰⁰ The so-called "bureau-pluralism" (or the "bureaucracy-mediated, pluralistic bargain state") (Aoki 2000: 156; 2010: 108).

²⁰¹ The political historical model (concept) of Japanese-style capitalism, the "1955 system", resulted in a clear division between politicians and bureaucrats: politicians, mostly members of the LDP, needed precise knowledge of constituent preferences and the socioeconomic context in which they were to act, while the (elite) bureaucracy necessarily had to manage national industrial policy with competence and consistency (Suzuki 2013: 87). This system has also managed to thrive due to the fact that the main opposition party, the Japan Socialist Party, has never emerged as a dangerous opponent to the LDP's long rule (Ido 2013: 131).

²⁰² However, the state has traditionally collaborated with the public sector in distribution policies, creating an interdependent public-private nexus (the "bureau-pluralism" mentioned above) (Aoki 2000: 156; 2010: 108). It is based on the presence of ministerial subunits that regulate the aforementioned industries in a decentralised process. Social stability in the Japanese system tended to be ensured by the redistribution of profits of competitive sectors towards interest groups and non-competitive sectors, while ensuring overall economic efficiency (Suzuki 2013: 87-88).

²⁰³ Known also as the political history concept of the "1955 system" (Ruggie 1982).

the structural neoliberal-oriented reforms begun in the late 1980s-early 1990s). This system, thus, translates still today into the enveloping governmental presence in multiple areas of policy.

Business, in turn, which is vested with this community accepted responsibility for collective well-being, has consistently collaborated with the state. At the same time, big business conglomerates have repeatedly taken on public responsibility, such as social welfare practices. State and business have proved to be interdependent in the pursuit of economic growth and social stability (Gilpin 2001). *Keiretsu* have enjoyed benefits such as trade protection and generous subsidies, especially in specific sectors such as the high-tech industry. The state, through low-cost financing and "administrative guidance" from bureaucrats, has emerged as a key regulatory player in the Japanese economy (Johnson 1982).

Japanese bureaucracy has encouraged and sometimes pressured investment in certain productive sectors, imposing high value-added standards in key productive sectors. The state has also imposed its policies in shaping certain social characteristics, such as the formation of a highly educated, industrious labour force (Garon 1994; 1997). The device of "administrative guidance" seems to have been one of the major factors in the success of Japanese industrial policies during its astonishing economic growth (Johnson 1982).

Concerning migration policies, the Japanese government has always been particularly reluctant to open up its borders. However, as in the Italian case, governments must inevitably be part of a tripartite consultation system that gives weight to the voice and interests of unions and employers. The cyclical alternation in Italy of governments with different political orientations has created phases of a different distribution of power resources of trade unions *vis-à-vis* capital, due to a more pronounced partisan effect (Watanabe 2014: 31-33; 127-128).²⁰⁴ In Japan this has been less evident because, unlike the Italian case, there has been greater continuity of government (even after the scandals that co-involved the LDP during the early 1990s). Thus, unlike the Italian case in which trade unions retain relatively strong political power and collective bargaining institutions such as concerted action (or social dialogue), the power resources of Japanese labour unions and their institutionalised access to policy-making is much weaker (Watanabe 2014: 29-31; 124-127).

2.6.1.1. Continuity of governments and their role in migration policies

²⁰⁴ This, however, has not always followed pre-determined political logic and ideological divisions, as for example during the centre-left Renzi government (2014-2016) with its conflictual relationship with the three main trade union confederations and its labour reformism (Jobs Act) (Interview with CGIL Veneto 2021).

Italy and Japan are also peculiarly similar in their political developments from the end of World War II at least until the 1990s. This is reflected in some historical traits of both countries, dominated by virtually comparable political processes and ways of governing. In fact, Italy and Japan have been defined as two "uncommon democracies", i.e. democratic systems in which, also due to the weak presence of dominant political forces of the (centre)-left, alternating governments have been extremely rare (Pempel 1990).²⁰⁵ The starting point is a similar historical context determined by the defeat in the war and thus becoming part of the US sphere of influence.

The main feature that united Italy and Japan in this period and their subsequent shared political development was the establishment, in both countries, of a system with a single conservative party at their head, the Liberal Democratic Party in Japan and the Christian Democrats in Italy (Itō, Suginochara 2014: 137-138).²⁰⁶ Despite this reality and the strong pro-US component, both countries had ideologically polarised opposition forces: the Italian Socialist Party (PSI) and the Italian Communist Party (PCI) (as well as a far-right party led by the Italian Social Movement (MSI)), while Japan had the Japanese Socialist Party (JSP) and the Japanese Communist Party (JCP). In those years, the DC and the LDP managed to consolidate their power by building a solid clientelist network that constituted their social and electoral base (Itō, Suginochara 2014: 141-145).

Both parties survived the economic shocks of the 1970s, albeit with different solutions to the problems. Even if the two parties were structurally similar, they were different in that the DC was a well-organised party and a party-based vote-gathering machine, while the LDP was an individual-based and flexible vote-gathering machine (Itō, Suginochara 2014: 146-149). This common path lasted at least until the early 1990s. However, after a period of divergence during the 1990s, they came closer again in the new millennium.

The divergence in the 1990s was caused by similar crises related to the corruption of the aforementioned parties: in Italy with a series of political scandals linked to the mafia (the most infamous being the "Mani Pulite" investigation), several anti-corruption and organised crime movements within the DC (e.g. the "Network" in Sicily), and a simultaneous collapse of the national economy after the growth of the 1980s; in Japan, several political scandals (e.g. the Recruit

²⁰⁵ The weakness of the Italian and Japanese leftist parties is built on the assumptions related to the particular industrial structure of the two countries, which is limiting for the generalised national organisation of collective actions. As discussed in the first chapter, the Italian case consists of a majority of small and medium-sized, if not family-owned, companies. The Japanese production structure also sees a prevalence of small and medium-sized firms, but with the difference of having strong hierarchical subcontracting relationships between them and large firms (Amable *et al.* 2012). The organisational weakness of these forms of corporate and industrial structures has consequently weakened leftist parties due to the inherent weakness of their traditional key allies (Magara 2013: 5).

²⁰⁶ The LDP and DC were also deemed to be "twin parties" (Sartori 1976).

scandal²⁰⁷ in 1988 and the 1992 corruption scandal "*Tōkyō Sagawakyūbin jiken*")²⁰⁸ led to the break-up of the party and its formal split (Itō, Suginozara 2014: 150-152).

These political earthquakes led to the dissolution of the DC in 1994 and the loss of power by the LDP in 1993. Thus, the Second Republic was born in Italy from the ashes of the First Republic, characterised by the division into two majority political blocs, the centre-right and the centre-left, and by programmatic electoral competition.

The big difference, however, is that the DC never managed to reform again, while the LDP returned to power shortly afterwards, just eight months later due to the collapse of the coalition that had replaced it in government (Itō, Suginozara 2014: 150). This distance remained until the 2000s, when a new, albeit tenuous, process of reconvergence started up again. The clientelist system has readjusted itself in both countries as pork-barrel politics, as well as strategies of the electoral programmatic competition, which are indispensable for electoral victory (Itō, Suginozara 2014: 153-156).

In terms of continuity of government, Italy and Japan were similar (though not identical) until the early 1990s. After that, Japan returned to LDP dominance, although not as overwhelming as it had done in the past, while Italy experienced a constant process of changing governments and oscillating political majority parties and coalitions. In the present state of Italy and Japan's political context, in the Italian case it is clear that maintaining constant policy orientations and continuity is difficult. Japan, on the other hand, is not faced with such changes thanks to the lasting predominance of the LDP. This constant alternative partisan effect could also be one of the explanations for a large difference in the management of migration policies and related market changes.

It is also true that the Mediterranean area as a region is different from that of North-East Asia, especially when compared to what has happened in recent years concerning migratory flows from sub-Saharan Africa. However, these migratory flows are loosely linked to labour migration and pull factors. The political management of the phenomenon can therefore hardly be compared regardless of political orientation or governmental continuity. Both governments have pressure from different components of tripartite relations regarding national migration policies, with a particular push from employers to obtain a reduction of labour costs and increased flexibility. However, different contexts determined by diversification of political orientations (especially since the

²⁰⁷ In Japanese *Rikurūto jiken* (リクルート事件).

²⁰⁸ In Japanese 東京佐川急便事件.

1990s), different economic policies and different power resources of trade unions and employers' associations have made the role of the state on the issue markedly dissimilar.

2.6.2. Trade unions

Migration processes are of fundamental relevance for trade unions. The very presence of foreign workers can influence various aspects of trade union structure, actions and strategies (e.g. strikes), especially at the nation-state level (Hyman 2001; Jonker-Hoffrén 2012; Alho 2015).

Concerning representativeness, trade unions have had as their ideal type worker a "white", male industrial worker (Hyman 2001: 30-31), who

"When most people think of 'working class' the image that comes to mind is the white industrial worker...By large margin, the American working class now predominantly consists of women and racial minorities."

(Wright 1997: 69, in Alho 2015: 18)

However, through globalisation processes production systems, labour market structures and the need for labour representation have changed. Indeed, especially in sectors that have been trade unions' representation core, such as heavy industry and manufacturing, they have seen a progressive decrease in the absolute number of members and a slow decline in union concertative importance. In recent decades, transformations have put all unions into a difficult position, as they have proved slow or unable to adapt to the new structural changes. This situation could translate into a real crisis of the union representation system (Korpi 1998; Beck 2000; Standing 2009; Milkman 2010; Alho 2015).

Societies and labour markets have also changed. Globalisation is only one factor that has led to the transformation of today's societies into post-industrial ones, in which the central role is played by the service sector and the knowledge sphere (Alho 2015). At the same time, the value of industrial manufacturing has decreased, changing production methods to become faster, leaner and more flexible, ready for diversified market demands and changes in competition assets. Great value is placed on innovation, profit maximisation and competitiveness (Perrons 2004). Trade unions, as mentioned earlier, have had considerable difficulties in adapting to these changes.

Trade unions have found themselves under financial and productive globalisation pressure that has brought about neoliberal drives and measures in the markets, resulting in a shift of power

away from labour. This transformation, albeit to different degrees, took place in both LMEs and CMEs (and clearly in MMEs) (Campbell, Pedersen 2001; Streeck 2009; Peters 2011). On the other hand, trade unions have also had to adapt to neoliberalisation mechanisms and international competitive pressure. For example, trade unions today are no longer solely concerned with the protection of workers, but with the efficiency of their services (Interview with the UIL Vicenza Provincial Secretary 2021). This transformative act makes unions yet another competitive institution in the already increasingly deregulated service industry.

From a VoC perspective, the processes of labour market dualisation and segmentation have led to an erosion in the base of core workers, albeit to a lesser extent than at the lower end of the labour market. In Japan, a firm's constant and numerous investments in the specific skills of its core workers have slowed down redundancies and changes in the upper end of the market (Thelen, Kume 1999a; 1999b; 2006).

However, following a power resources perspective, labour has found itself at a distinct disadvantage *vis-à-vis* employers, and consequently their representatives. The crisis in many low productivity sectors, the advantageous position of core workers, the decrease in union density²⁰⁹ and the importance of sector unions, the fragmentation of trade unions (or relative lack of confederative networks in Japan), and the increasing distance between trade unions and left-wing parties have created a relevant disparity in power resources between the capitalist class and labour (Korpi 1983; 2006; Esping-Andersen 1990; 1998).

2.6.2.1. Trade union's inclusion and exclusion strategies for migrant workers

Trade unions can find themselves in the situation of adopting two distinct strategies towards migrant workers: inclusion or exclusion. A trade union strategy of inclusion indicates a willingness to strive to ensure that the rights and benefits of migrant workers are the same as those of native workers, as well as an improvement of their general living and working conditions. Exclusionary strategies, on the other hand, aim at the differentiation of rights and benefits between migrant and native workers, thus creating a situation of social closure that benefits the latter (Weber 1978; Alho 2015: 25).

²⁰⁹ The decline in union density in Italy began in the second half of the 1970s. The consequences have been a decrease in the labour share, a decrease in the unemployment rate and an increase in wage differentials between different sectors and between different professional qualifications. The combination of these transformations, and the decline in the overall power of trade unions, determined a sharp increase of inequalities in wages and earnings differentials (Checchi 2013: 160-161).

Trade unions decide which strategy to adopt concerning migrant workers (or their native members) based on various considerations. One inclusion strategy may be to create channels of entry to the union that are also user-friendly for migrant workers. They can also improve migrant participation in society (Milkman 2010). However, the main reason for trade unions to adopt inclusive strategies is the need to combat declining membership and union density by refreshing their membership. To increase their frame of representation, it is inevitable to rely on those who had been historically underrepresented, namely migrant workers (Bengtsson 2013). Finally, unions may adopt inclusive strategies simply because of ethical issues and the defence of workers and human rights, regardless of the worker's origin or legal status (Watts 2002; Alho 2015).

Conversely, an exclusionary strategy may be adopted when migrant workers are seen as a potential threat to their represented core workers, such as creating a sphere of downward competition in wages and working conditions (Penninx, Roosblad 2000; Briggs 2001; Frank 2012). They can create pressure on the government to obtain migration policies that are unfavourable to migrants, by trying to dictate who can be admitted to certain market sectors (through a requirement filter) or to create pressure for the necessity of obtaining a residency permit (Gächter 2000; Briones 2009). They may simply decide to create barriers to the entry of migrant workers into the union. Ultimately, trade unions can become labour market gatekeepers (Alho 2015: 26).

In Italy, the strategy of the trade unions, particularly the confederations, is generally inclusivist, even if it has several ambiguities within it. Even though the official vision of the main trade union confederations is one of welcome and inclusion, it shows potential friction with the union's historical membership base.

The paradox is as follows: the defence and involvement of migrant workers in their activities often clash with the political vision of the Italian worker at the lower end of the labour market segmentation, in turn creating an ideological conflict in union strategies. This dynamic, which is particularly evident in Italian areas where the right-wing is more deeply rooted,²¹⁰ can create problems of representation and political action.

In Japan, trade union strategy is similar to the international one, with the particularity that, with the prevalence of the enterprise union system, there is a greater diversity of ideas related to each firm (or group in the form of *keiretsu*), while confederalism is much weaker. Collective bargaining in Japan is conducted in work union units and local labour unions rather than in federations.

²¹⁰ For example, with some extremely industrially developed regions (e.g. Lombardy and Veneto).

A similarity concerning the history of the two countries is that the ideological divisions between the various trade union confederations discouraged potential collective bargaining with employers and their representatives, and drastically reduced the political influence of organised labour (Tolliday, Zeitlin 1991a: 279).

2.6.2.2. Italian and Japanese unions: an overview

The Italian and Japanese industrial relations systems present an important point of difference between the two countries. As highlighted in other studies, first and foremost Watanabe's work on Italian and Japanese labour market deregulation policies, the power distribution between labour and employers is decisive in the different degrees of deregulation of the respective labour markets. Although neoliberal pressure driven by globalisation has deregulated both labour markets, the difference in the extent of deregulation policies is explained by the different strength of trade unions, according to the power resources model (Korpi 2006). This difference in power distribution also affects labour policy-making structures (Watanabe 2014). In short, the difference in the structure, relevance and strength of trade unions is decisive in the implementation of policies that are of extreme importance for certain categories (in the case of labour market deregulation policies they affect all categories of workers, but particularly non-regular workers), because in countries that are similar in many respects, they turn out to be particularly incisive in the differentiation of policy output.

The next sub-section will briefly review the Italian and Japanese systems of industrial relations concerning trade unions. This section is an introductory part before going into the details of Italian and Japanese trade union positions on the migration phenomena and the integration of the interviews carried out with the industrial relations actors involved in the study.

2.6.2.3. Italy

As mentioned several times in the present text, Italian trade unions are industry-based, resulting in the *de facto* industry- or trade-based unions. A characteristic of the Italian trade union system is that it has had a strong tradition of class representation rather than merely providing services to its members. Despite general political recognition, the class-representative essence of some Italian

trade unions has seen the emergence of antithetical phenomena such as workers joining only for one action (or service) and quickly leaving later, undermining the overall representative power of these institutions (Baccaro *et al.* 2003a). Another issue is the disproportionate number of members within the different confederations. In particular, the number of pensioners within the same trade union confederation is generally high, exacerbating the difficulties encountered in the Italian trade unions in reaching new and younger members and undermining the elasticity of the representation structure (Interview with CGIL Veneto 2021).

The Italian system is mainly composed of three trade union confederations, CGIL, CISL and UIL, each of them with a different history and a strong historical component of political affiliation. The majority of workers who are members of a trade union belong to one of them. The structure of these confederations is based around local branches of different industrial unions and local bodies called chambers of labour ("*camere del lavoro*"). Generally, confederations have within them industrial federations representing the same sector (Negrelli, Sheldon 2004: 156-157).

However, there is much more variety in terms of numbers (and political positioning) in the overall sphere of Italian trade union representation, in some cases even disconnected from traditional trade union structures. This is the case of confederations such as UGL (*Unione Generale del Lavoro*, oriented towards the political right), CISAL (*Confederazione Italiana Sindacati Autonomi Lavoratori*, with a strong presence in the public sector) and USI (*Unione Sindacale Italiana*, of a more anarcho-syndicalist orientation). Other confederations, untethered from the traditional trade union hierarchical structural principles, have arisen around rank-and-file committees, as in the case of COBAS (*Confederazione dei Comitanti di Base*). They arose as expressions of dissent from the compromises adopted in previous decades by the major confederations, resembling an earlier anarchist unionism style. Autonomous unions are often small, sector-oriented, sometimes employer-oriented organisations (Negrelli, Sheldon 2004: 159-160). This fragmentation has over the years, however, undermined broader class solidarity and a certain degree of unity in Italian trade union representation, limiting compactness in some phases of national collective bargaining.

CGIL, the largest of the three confederations, was politically and ideologically linked to the Italian Communist Party (PCI),²¹¹ CISL to the anti-communist area of the Christian Democrats (DC) and UIL to the Italian Socialist Party (PSI).²¹² This original ideological affiliation led CGIL to be more associated with the idea of working class solidarity and therefore more inclined to the representation of labour in its entirety, while CISL was oriented towards the representation of the

²¹¹ In Italian *Partito Comunista Italiano*.

²¹² In Italian *Partito Socialista Italiano*.

interests of their member unions, resulting in an associational union confederation; UIL, despite often taking a more collaborative role close to CISL's, was a union confederation force in the middle, resulting in flexibility and sometimes a deterrent to some CGIL stances. Besides, the socialist minority fringe of CGIL acted as a "control valve" to avoid some radical stances of the confederation, thanks also to a shift of part of its members to UIL (Watanabe 2014: 49-50). Despite the differences, class solidarity is a constant feature of the Italian confederal system, at least concerning the near-total absence of this value compared to the Japanese case. Currently, although the division of ideological affiliation can be traced back to the one just described, ideological barriers have gradually relaxed.

Another important topic is the rate of unionisation. In Italy, the number of union members is between 12 and 15 million, although with a clear disproportion in the representation of pensioners (43% of total members in the three main confederations in 2018). The unionisation rate in 2018 was 34.4%,²¹³ while the gender division is roughly in the middle (presence of female members: 48.1% CGIL, 48.7% CISL, 42.0% UIL) (Fulton, Sechi 2019).

After a steady growth rate until 2010, the federations of pensioners started to decline numerically, compared to an increase in the same period of the other active labour federations (CGIL between 2010 and 2017 increased by 4.2%; CISL between 2010 and 2019 increased by 4.2%; UIL between 2010 and 2018 increased by 7.6%. CGIL, CISL, UIL data).

2.6.2.4. Japan

The Japanese industrial relations system is known to be enterprise-centred and to consist mainly of enterprise unions. The centrality of the enterprise system is reflected in a lack of class solidarity, in favour of prioritising the protection of workers in each enterprise, individual business performance and collaborative relationships between labour and management.

Also in Japan, similar to Italy, there are three major trade union confederations, even though there are a total of more than a hundred industry confederations. Rengō was born from the merger of Minkan Rengō and Sōhyō, the latter representing the public sector and tending towards the political left. The other two confederations are Zenrōren, linked to the Japan Communist Party

²¹³ For the most recent figures of CGIL, CISL and UIL members, see respectively <https://www.cgil.it/i-tesserati-2014/> for CGIL, <https://www.cisl.it/notizie/primo-piano/sindacato-cisl-crescono-nel-2019-gli-iscritti-piu-29-000-aumentano-i-lavoratori-attivi-di-oltre-40-000-associati-il-44-88-degli-associati-sono-donne/> for CISL, and https://www.uil.it/tesseramento_cat.asp. for UIL.

(JCP), and Zenrōkyō, affiliated to the Japan Socialist Party (JSP), both left-wing and born out of the desire for individual unions to counter the hegemony of Rengō in the late 1980s. There are also other influential sector confederations, such as JC-Metal, an industrial federation of automotive and electronic industry federations. The main purpose of these confederations is to coordinate the actions of the individual enterprise unions, to address issues concerning their industries, to help members in disputes and to create pressure through political lobbying (Gordon 1998; Kuwahara 2004). However, only Rengō has gained relevance in Japanese industrial relations and power in bargaining with employer representation and the government, being the main national centre for most Japanese industrial confederations.

Due to the prevalence of enterprise unions, the number of individual trade unions is particularly high. Most of the union members work in companies with more than 100 employees. Some of these unions originated from company and factory-based wartime production committees. Individual enterprise unions within an industry generally join an industrial federation. However, this type of union is not the only one, and industrial, craft and general unions are also present, although they are a minority (Kuwahara 2004: 284). By comparing effective resources and power, enterprise unions have greater flexibility, decision-making and financial autonomy, and can more effectively pursue the interests of their members, whereas confederations only have an important coordinating role. Moreover, since wages and working conditions are closely linked to the success of the company and its competitiveness, enterprise unions promote labour-management cooperation, which in turn fosters identification and closeness between employees and employers, regardless of the formers' position in the firm.²¹⁴ On the other side of the coin, this system does not allow for broader class identification but is limited to encouraging identification only at the enterprise level. At the same time, Japanese enterprise unionism suffers from a type of membership almost exclusively limited to core regular workers, most often excluding *de facto* representation of non-regular, temporary, part-time (especially women) and migrant workers (Kuwahara 2004: 286).

One of the most important differences in the original approaches to industrial relations in Italy and Japan is that, while in Italy the dominant party during the second part of the last century (until the 1990s), the DC, was affiliated with the CISL, the LDP had no direct affiliation with any trade union.²¹⁵ Also, Rengō officially preferred cooperative labour-management relations, in the typical spirit of Japanese industrial relations and enterprise unionism.

²¹⁴ In Japan the wage differential between blue-collar workers, white-collar workers and management is not as high as in Western countries, thus reinforcing the sense of belonging and identification in the firm (Kuwahara 2004: 285).

²¹⁵ Although ideologically closer to the Social Democratic Party, SDP.

The unionisation rate in Japan is declining. Since the enactment of the Labour Union Act in 1945, an overall unionisation rate of 55.8% was achieved in 1949. Since then it started a slow and gradual decline, reaching 30.8% in 1980, 21.5% in 2000 and 17.1% in 2020.²¹⁶ This process is even more pronounced considering the differentials between the different sizes of enterprises. In large enterprises (one thousand workers and more), slightly less than half of the employees are still union members. In medium-sized enterprises (between 999 and 100 workers), the unionisation rate has gone from 30% to 10%. In smaller enterprises (fewer than 100 workers), it has gone from 2% 25 years ago to 1% today. Although this shows that the decline in the unionisation rate in Japan is generalised at all levels of the enterprise, small enterprises are indicative of the great disparity within the representativeness of Japanese organised labour (Hamaguchi 2021b: 23).

2.6.2.5. Trade unionisation of migrants in Italy and Japan

In Italy, the unionisation of migrants is numerically significant. The figure is not easy to determine, but the trade unions themselves are almost unanimously in favour of expanding this number (Interview with CISL 2021). However, what is complex is the increase of migrants into active and participating roles within the union, unrelated to the simple request for temporary help and protection (Ambrosini 2020: 265). Despite the operational potential of a higher degree of migrant participation in the union structure, such as direct connection with foreign workers and greater sensitivity to specific issues related to migrant workers (Mottura 2002), their underrepresentation in cadres invalidates this possibility (Ambrosini *et al.* 2016).

A fortiori, migrant workers are underrepresented in the Japanese trade union system, especially due to their low presence in historically unionised sectors. UA Zensen estimates higher participation of migrant workers in the service sector while admitting the difficulties associated with this possibility (Interview with UA Zensen 2020).

2.6.3. Employers' associations

Employers' associations, and consequently firm and company conglomerates, are complex institutions, just like the state and trade unions. Their decisions are influenced by internal political

²¹⁶ There was indeed a slight increase from 16.7% in 2019 to 17.1% in 2020. This is actually due to the decrease in the total number of workers due to the COVID-19 pandemic (Hamaguchi 2021b: 23).

processes, but also by external pressures. Potentially, employers' associations and firms are to be regarded as autonomous historical actors, whose choices and positions reflect the economic-political environment in which they find themselves and simultaneously modify it (Tolliday, Zeitlin 1991b: 2).

International variations in national models of labour management, employer organisation and collective action have already been compared in the literature. The different employer labour policies, whether of an individual in-house or collective nature, vary to an important extent according to geographical, temporal and structural variables. The different patterns are in turn determined by several variables, such as the relationship between cultural factors, the type of institutions and the various strategies applied (Tolliday, Zeitlin 1991a: 238).

In the VoC approach, the entrepreneurial side is assumed constant and immutable, in line with its market economy model. However, this assumption proved to be inaccurate, especially in the case of CMEs. The changes that occurred in CMEs in the financial market were stronger than those that occurred in LMEs, and consequently business behaviours and preferences were remodelled (Ido 2013: 129). In both Italy and Japan, employers have changed their interests in tandem with the changing national (structural reforms) and international (globalisation push) economic structure, demonstrating that they are not immobile subjects. The process seems to be an increasingly pronounced transformation towards neoliberal principles, altering employer strategies as well as the legal framework.²¹⁷

In Italy, as in Japan, employer labour policies are conditioned by their relationship with the state, the political system, and their relationship with and strategies of trade unions (Contini 1991: 194). In Italy, employers' organisations are often considered weak and less cohesive than in other models, such as the German or British ones (Tolliday, Zeitlin 1991a: 267-268). Nevertheless, the Italian employment relations system has been highly volatile for more than a century (as have politics and economics), a common feature in Mediterranean systems (Sapelli 1995). The Italian model is characterised by a national bargaining centre with trade union confederations and the state, and a sub-federal level that mixes elements of sector and territorial representation (Tolliday, Zeitlin 1991a: 269).

²¹⁷ In the Japanese case, the Worker Dispatching Law of 1985 (amended in 1999 and 2003) is emblematic. Initially regulating practices and protecting core workers, it liberalised temporary work agencies first to 13 categories of high-skilled dispatched workers, then to 26 (1999), replacing lists of permitted types with negative lists (i.e., which jobs could not be included), and finally fully liberalising the employment of temporary workers in the manufacturing sector (2003) (Ido 2013: 131-132). This reform changed both the traditional forms of regular work (and the respective increase in non-regular workers), and the employers' attitude towards the employment of core, regular workers.

In Japan, on the other hand, despite the presence of influential collective forms of employer representation, the prevalence of bargaining remains within the firm. Indeed, except for the public sector, and the annual *shuntō*,²¹⁸ disputes, collective agreements and most interactions are regulated internally between company management and the enterprise union. Consequently, Japanese confederal enterprise representation seems to have a simple formal role (Tolliday, Zeitlin 1991: 274-276).

The interactions between these actors determine strategies and attitudes towards the market, entrepreneurs and labour, including migrant workers.

2.6.3.1. Italy and Japan

Employers' associations support their members first and foremost. They represent the national industry and business, and there is a clear division between associations representing large firms and those representing SMEs. In Italy, for example, Confindustria is the main association representing manufacturing and service enterprises (Confindustria 2021b), while Confartigianato Imprese is the largest European network representing the interests of artisans and small enterprises. Italy holds the record in Europe for the largest number of craft enterprises (Confartigianato Imprese 2021). Overall, the Italian business framework presents a multitude of confederal organisations, determined by different sector identities, political orientations and size of the firms represented. Trade and retailing are mainly represented by Confcommercio and Confesercenti, while agriculture is represented by Confagricoltura, Confcoltivari and Coldiretti. In addition to Confartigianato, Confapi also represents small and medium-sized enterprises (Negrelli, Sheldon 2004: 154). But the list of representative organisations could go on.

Confindustria, in the vast sphere of Italian employer representation, is the most important, encompassing the key sectors of manufacturing, construction and building, and increasingly the service sector. As the main representative of organised capital and the main interlocutor in tripartite economic policy-making, Confindustria is involved in other areas such as policy development,

²¹⁸ In Japanese 春闘. *Shuntō*, literally "spring wages offensive", are a series of annual wage negotiations between enterprise unions and companies. They are mainly coordinated jointly by the general and industrial union confederations, which help the basic unit of negotiation (the enterprise unions) in collective bargaining by industry. The *shuntō* period is between February and May (Ogino 2021: 18). This system favoured the leading companies on the negotiation of higher wages, as small and medium-sized companies are involved at a later stage (Watanabe 2014: 56). The three factors that determine the magnitude of the annual *shuntō* are consumer price levels, labour market demand and supply conditions, and overall company performance.

lobbying and propaganda (through communication and dissemination of perspectives and policies in the media, including the "Gruppo 24 ORE" publishing group, of which it owns the majority of shares). Despite its configuration linked to the representation of big business, most of Confindustria's affiliates are small and medium-sized enterprises, especially at the local level (Interview with Confindustria Vicenza 2021). This has produced a strong historical internal division between factions belonging to large enterprises and SMEs (Negrelli, Sheldon 2004: 155).

Historically, Italian management representation has been and still is associated with relational ambivalence between trade unions and governments. Trade union strategies, their internal and confederal differences, the different governmental stances and the overall Italian political system are the main reasons in shaping the attitude of employer representation in labour policies. The relations with other industrial actors that led the employer associations were more often successful, starting as early as the 1920s (Contini 1991).

This theme of relations and internal divisions has also characterised Confindustria, which in the different phases of its history has had to come to terms with the complexity of Italian industrial relations,²¹⁹ but also of the different currents and thoughts within it (or on the periphery), for example in its relationship with FIAT.²²⁰ Notwithstanding this, and despite the constant changes it has had to face,²²¹ it has always managed to maintain its leading role in employer representation in Italian industrial relations (Contini 1991).

In Japan, the Keidanren is the main representative of the business community, while the Japan Chamber of Commerce and Industry (JCCI) is more representative of Japanese SMEs. Keidanren, despite playing a central role in representing the business sphere in industrial relations, does not play a direct part in collective bargaining. Rather, it sets guidelines for employers and influences the management of labour issues.²²² In a context where employment relations are still focussed on enterprise unionism, Keidanren takes on the role of coordinator (and publiciser) of employers' views on employment relations, as well as in the selection of representatives for

²¹⁹ Following the Second World War, the state gradually played an increasingly important and influential role in the management of the economy and economic policies. During the domination of the Christian Democrats, Confindustria had a strong political influence. In fact, with the shift to the left of the DC at the end of the 1950s, Confindustria was able to limit changes thanks to its political weight, counteracting the consolidation of a power bloc of the public sector (which later managed to obtain its own vast political and economic power) (Contini 1991: 184-186).

²²⁰ FIAT (acronym for "*Fabbrica Italiana Automobili Torino*", literally "Italian Automobiles Factory Turin") is a historic Italian car manufacturer. In the 1960s it was FIAT, together with public sector companies, that moved to the left and approached the Socialist Party, breaking away from the political positions of Confindustria, maintaining its own and often more aggressive stances (Contini 1991: 186-188).

²²¹ As, for example, in the internal struggles of the 1970s for control of its leadership (between FIAT and Montedison), particularly at a time of intense industrial conflict with labour (Contini 1991: 188-190).

²²² Keidanren also represents Japanese entrepreneurs in the International Labour Organization (ILO) (International Labour Organization 2021).

government commissions/councils and the International Labour Organization (ILO) (Suzuki *et al.* 2016). Other functions are to give advice and services to its members on issues related to labour conditions and employment practices (Kuwahara 2004: 287).

Even more important is the role Keidanren assumes during *shuntō*, the "labour spring offensive" that characterises Japanese collective bargaining once a year between February and May. As Rengō does for enterprise unions, Keidanren dictates the guidelines for employers to follow during bargaining with unions (Kuwahara 2004: 287). Comparing the power relationship between trade unions and workers and that between employers' associations and employers, a clear disparity has emerged over the years. While trade unions have seen a sharp decline in participation and representation, weakening their already meek performance, employer representation has become increasingly stronger, leading to an imbalance of power between capital and labour (Kuwahara 2004: 290-292).

Even though it is still the main point of reference for Japanese management representation, as the representative of all large companies, employer lobby and conservative national business, it too has had to adapt to the processes of deregulation of the labour market by taking on new facets of representation and undertaking new atypical positions concerning peculiar Japanese industrial and employment relations.²²³

2.6.3.2. Why do entrepreneurs need migrant workers?

Employers are an important component in the demand and employment of migrant workers. According to Blauw, "*the role of employers in supporting labour migration should not be underestimated*", and concerning human resource management strategies, after an initial screening in the local labour market, "*when confronted with labour shortages and affected by high ambitions concerning cost reductions or maximum utilisation of labour an orientation towards a foreign labour market becomes in sight*" (Blauw 2002: 13-14). After all, at least in the European case,

²²³ A recent example of these changes in Keidanren (2019) is the announcement of a phasing out of *shūkatsu* (*shūshoku katsudō*), a staple of the Japanese human resource management system since the 1990s. This practice consists in the search for young workers to enter the labour market recruited by companies immediately on completion of their studies. It is an annual job hunting practice that binds the new graduate (or recent graduate) in the peculiar Japanese system of the life contract (especially for salarymen). Recruitment generally takes place in the spring months, and the job offer is made in October. Other features are a lockstep promotion during the first decade of employment, a type of salary linked to the size of the company and the absence of careers built on the basis of the worker. *Shūkatsu* became notorious for being a highly standardised process, creating a continuous recruiting mechanism (resulting in a low percentage of youth unemployment) that at the same time limited forms of individuality among workers. The loss of this practice represents the end of a key part of Japanese employment relations (Schaede 2020).

employer preferences for migrant labour have been considered central in determining a circular causal relationship between labour migration and market segmentation degree. Capital's choices are constantly determined by their will to minimise labour costs (Castles, Miller 2009; Ciupijus 2011; McCollum, Findlay 2015).

So, what are the reasons why employers should prefer migrant workers over native workers? In contrast to native workers, migrant workers are preferred for their high degree of flexibility, notably in sectors such as agriculture, construction and the food processing industry. They are seen as more adaptable to the variable demands of market fluctuations, long working hours, overtime, employment on weekends and public holidays, and in different jobs. Employers can dispose of and utilise migrant workers according to the variations and fluctuations (even daily) of the market that determines the success, or survival, of an industry (Taylor, Bursch 2004; Dench *et al.* 2006). The employment of undocumented workers is a further process to lower costs, especially in countries like Italy where this grey area is particularly developed due to the strong segmentation of the market, the fragmentation of the economic fabric and the low innovativeness of SMEs, or due to the strong demand for caregiver employment (Reyneri 2003; Arango *et al.* 2009; Fellini, Fullin 2018).

Low-skill and low-wage jobs have created a gap between the domestic workforce, both in terms of wages and conditions and the social undesirability of the job. Quite simply, it is often the case that employers do not receive applications from native workers. In lower-skilled jobs, the labour shortage is more problematic than the lack of skills, and migrant workers are more likely to agree to lower wages (Dench *et al.* 2006). The characteristics offered by migrant workers can be advantageous for employers.

Part 3.

2.7. What will the future be like? A hypothesis of economic convergence based on the employment of the migrant workforce

This thesis aims to understand the extent to which political and economic convergence is possible as regards Italy and Japan. In particular, whether Japan can move towards a mixed market economy system especially in fulfilling labour market needs through new migration policies. A kind of harmonisation of national practices (Gilpin 2001: 183-184). Conversely, convergence (or divergence) processes are among the most useful conceptual tools for assessing the impact of

globalisation on different national patterns (Bamber *et al.* 2004b: 12), including the structures of industrial relations, migration and economic policies. In "industrial" (employment) relations, for example, the convergence thesis is justified to the extent that given the presence of a global trend towards the use of certain technologies and the persistence of market forces linked to industrialisation and post-industrialisation, employment systems are driven by parallel forces towards convergence or uniformity. The logic behind this principle was originally built around the idea of "industrialism",²²⁴ as more and more societies adopt industrial forms of production and work for an organisation, "common features and imperatives" are created across societies by embodying the "principles of pluralistic industrialism" (Kerr *et al.* 1960: 384-392).²²⁵ In this case, the main causal factor in the process is technology, and the process of convergence stems from it (although the persistence of social, cultural, ideological and political variables will never allow absolute convergence) (Kerr *et al.* 1960).

In the Italian and Japanese cases, structural similarities have been taken into account, including demographic, political and historical dynamics. However, there is no lack of diversity, especially in the light of a VoC perspective. Scholars with a VoC perspective are the first to exclude the possibility of convergence, not only between countries like Italy and Japan but between different capitalist systems in general. According to them, the peculiarities that characterise a particular political-economic system are its strength to overcome difficulties. The VoC approach argues that different national institutions determine the market strategies of firms and how states develop adjustment strategies, adapting through their peculiarities (comparative advantages and disadvantages) to the problems caused by phenomena such as globalisation (Devore 2015).

Globalisation, in its common components of deregulation, high unemployment and increased capital mobility, leads firms to choose and use the best strategies, adopting the best labour regime for them. This situation leads intuitively to a convergence of strong labour countries towards dynamics similar to weak labour countries (Thelen, van Wijnbergen 2001). In short, it would suggest a process of convergence.

From this point of view, however, the VoC literature is contrary to this hypothesis. Where there may be convergence, e.g. in deregulation, the speed of the process is different from case to case. The same can be applied to the case of decentralisation (or centralisation) processes (Perez

²²⁴ This thesis has been widely contested over the years, as it was considered to have no factual basis or explanatory value. Kerr later modified this thesis by stating that convergence is a tendency, which is unlikely to lead to two precisely identical systems as well as recognising an important difference in the assessment of convergence between macro and micro systems (Kerr 1983). For further criticism of this theory, see Bamber, Lansbury, Wailers 2004.

²²⁵ For further analysis, see generally the works of Rostow W. W., and particularly "The Stages of Economic Growth: A Non-Communist Manifesto" (Rostow 1960).

2000; Thelen, van Wijnbergen 2001). Only the crisis of unions and collective bargaining seem to be common factors (Thelen, van Wijnbergen 2001). But again, as in the case of Germany, the weakened role of labour in industrial relations can be attributed more to the lack of employer solidarity (Thelen 2001; Thelen, van Wijnbergen 2001: 74-78).

After all, it is exactly the aim of VoC literature to provide an explanation as to why, despite neoliberal pressure and globalisation, institutional convergence of the different capitalist political economies has not yet taken place (Bucken-Knapp 2007). The lack of homogenisation in the expected direction, i.e. a global convergence of institutions towards liberal capitalism, has also been explained by Hall and Soskice by analysing the functional relationships between the institutions of national economies, thus dividing countries into the categories of LMEs and CMEs (Hall, Soskice 2001a).

Concerning convergence processes, Dore has contributed enormously to the debate. With his famous work comparing Japan and Britain (1973), he hypothesised a tendency of convergence of the latter more towards Japan than the US, placing less emphasis on technology (compared to Kerr) and giving more importance to the emergence of giant corporations and the spread of democratic ideals of egalitarianism. Returning to the topic of industrial relations, Dore identified the "late-comer" effect, i.e. Japan started its industrialisation process relatively late compared to Britain, therefore it was able to exploit this delay by learning from countries that had already gone through this process.²²⁶ In this way, the late-comer countries were able to adopt better organisational forms and institutional structures for the industrialisation process, bridging the gap between the former countries more quickly. Dore hypothesised that convergence was more likely to be towards a Japanese model than towards other Western models, i.e. towards the so-called "Japanese management practices" (Dore 1973).²²⁷

But what would convergence be? According to neoclassical theory, the economic interdependence that connects in various ways the plethora of countries will inevitably lead to convergence in economic performance. For example, productivity levels, economic growth and national incomes will become increasingly similar. It has even been suggested that globalisation is the cause of a process of disappearance of national differences through a convergence of economic structural peculiarities and private economic practices. Globalisation, characterised by a dramatic

²²⁶ Japan is also considered a quintessential example of state-driven late development (Kasza 2018:146). For more on late development theories, see Veblen T. (1915) and the works of Gerschenkron A., particularly "Economic Backwardness in Historical Perspective: A Book of Essays" (Gerschenkron 1962) and "Continuity in History and Other Essays" (Gerschenkron 1968). For the same idea applied more recently to Japan, see Dore (1973).

²²⁷ Again, there was no shortage of criticism. Moreover, Dore's theory has been found to be inaccurate in that differences have persisted due to variations reflecting different strategies adopted, power among the parties involved, diverse institutional configurations, cultural, traditional and value factors (Bamber *et al.* 2004b: 16-18).

increase in global economic competition, an expansion of foreign direct investment, and the role of international trade, has triggered adjustment processes to close international disparities. These disparities can be bridged by economic and technological adjustments. The role of the market is central. Thus, to adapt to these changes, different countries need to adopt similar economic practices and establish (or adapt) similar domestic institutions. The economic practices to be adopted are also precisely described by neoclassical theory, such as economic openness and non-interventionism (Gilpin 2001: 184).

This process of generalised convergence of economic performance between countries has not taken place, at least not homogeneously. Only cases of some East Asian countries, thanks to the presence of adequate social and political infrastructure, have managed to catch up. The same applies to the convergence of economic institutions and business practices (Berger, Dore 1996; Gilpin 2001). One example is Japan, which, despite a constant movement towards deregulation, has always resisted a transformation of its economic and productive peculiarities by imitating the American model. The greatest concern has been that of seeing the collapse of "social peace" and balance in society, putting Western individualism to the fore at the expense of the social bond typical of Japanese culture and society (Gilpin 2001: 191-192).

Ultimately, the most important factor for the assessment of possible convergence or divergence phenomena is the choice of the dependent variable of analysis. A dependent variable, such as a measure of wage inequality, can more easily point to convergence processes between countries. Other variables, on the other hand, may lead to opposite processes of total divergence and maintenance of national peculiarities (Bamber *et al.* 2004b: 26).

To justify a possible convergence (or non-convergence) process, especially on the Japanese side towards political and managerial structures similar to those of the Italian matrix, several factors may be taken into consideration: structural dynamics that help convergence, cultural (but also technological) characteristics that undermine its implementation, and the role of state policies and institutional interventions on this perspective.

In this sense, a different approach to the issue, identified by the Varieties of Neoliberalism (VoNeoliberalism) in contrast to the Varieties of Capitalism (VoC), could help. This issue will be introduced and discussed in the section below.

2.8. Comparison between Italy and Japan. Why? VoNeoliberalism vs. VoC approach

In Chapter I and in some of Chapter II it was explained why we should compare two countries such as Italy and Japan using the VoC approach as an analytical frame.

The initial thesis of this work concerned a possible convergence between the economic policy systems of Italy and Japan due to the pressure of globalisation and the increasing presence of neoliberal policies (deregulation of the labour market and liberalisation of services, in addition to a series of paradigms linked to the different institutional components of contemporary capitalist societies), especially in certain sectors most affected by structural demographic processes and social dynamics (ageing population, low birth rate, etc.) that have hit both countries hard.

Italy and Japan, despite important differences,²²⁸ including, first and foremost, belonging to an MME and a CME respectively (Hanckè *et al.* 2007; Molina, Rhodes 2006), have numerous similarities. Some of these are the aforementioned structural dynamics, including the fact of belonging to countries with the most rapidly ageing population and the lowest birth rates among OECD countries, but also similarities of a historical, economic, political and cultural nature. For example, the defeat in the Second World War, the following urgency for economic reconstruction and (economic) support from the United States, the almost constant presence from the fifties to the nineties of centre-right governments very similar in their "relational" dynamics and ideological positions (both dominated by strong internal divisions and belonging to distinct spheres of influence), the presence of left-wing oppositions which, at the time of the Cold War, never substantially took part in the government, the presence of strong underworld networks within the society (mafia and *yakuza* respectively, often compared to each other). It is possible to continue by assessing the similar characteristics of the national productive fabric and the vast presence of SMEs, the strong dualisation of the labour market, the general upgrade in the expectations of young people regarding their first job and career, and a preminent transformation of the two societies from predominantly manufacturing systems to service-oriented societies. Finally, in Dore's words, it is interesting that they are both "late developing countries" whose modern history can be defined by the latter part of the nineteenth century (Watanabe 2014: xv).

²²⁸ Among all of these, it is worth mentioning the great socio-economic differentiation between the various Italian regions, a factor present but not so marked in the Japanese archipelago; the different weight of government bureaucracy, strong in Japan, weak and considered less competent in Italy; the decisive separation in the 1990s of the parallel political paths begun during the 1950s, in which various political scandals led to the dissolution of the DC in Italy and the (momentary) loss of power of the LDP in Japan, the latter being able to return as a protagonist of the political scene shortly thereafter (Watanabe 2014: xv). As far as this study is concerned, the different type of industrial relations between the two countries (a union system composed mainly of industrial unions in Italy and enterprise unions in Japan) and, above all, the different numerical and "qualitative" presence of migrant workers are decisive. Also of interest for the purposes of an evaluation of general education systems is the clear difference in the population with tertiary education: Italy and Japan are, in fact, at the antipodes among OECD countries, with the first country almost at the bottom and the second among the countries with the highest percentage, well above the OECD average (OECD 2019a).

However, the VoC approach turns out to be largely opposed to a possible convergence between systems of political economies belonging to different market coordination categories (LME, CME, MME). The VoC perspective, on the other hand, predicts that the diversity among different regimes will remain, or even increase, due to the rational choice of coordination mechanisms based on the comparative institutional advantages of each system. Therefore, the VoC prediction for the future is that globalisation push incentivises the survival of capitalist diversity in light of the firms' rational behaviour in each institutional context (Hall, Soskice 2001a: 62-66). Otherwise, structural similarities within the same coordination categories are expected to increase. The neoliberal pressure brought about by globalisation is seen only as accelerating this overall process (Howell 2003).

This approach has also been criticised for not being able to fully explain dynamics of differentiation within the same regime type, such as increasing similarities between different categories of market economies, for example in labour markets processes and economic deregulation policies (Watanabe 2014: 36). Among the main criticisms of the VoC approach is the lack of sufficient attention to political factors, such as power distribution and class conflict between labour and management, and to policy-making structures (Howell 2003).²²⁹ The focus of scholars with a VoC perspective is on institutional complementarities and the resulting coordination mechanisms that create comparative advantages, leaving out the political dynamics that create certain policy choices and specific economic institutions (Watanabe 2014: 37), or the role of the state seen more as an apolitical embodiment of the will of employers rather than an active player with its own interest agenda and internal divisions (Howell 2003). The immobility of the VoC approach, especially its weakness in predicting changes in a state's trajectory,²³⁰ remains its greatest weakness (Meardi 2018: 633).

On the contrary, the VoNeoliberalism approach foresees a process of convergence between the different regimes of economic capitalism. The different capitalist economies under the pressure of globalisation, which contain forms of embedded neoliberalism principles in their transformation process, are slowly restructuring their policies and institutions, including the labour market and the welfare state, increasingly resembling forms of institutional complementarities that characterise LMEs. States' focus is to enhance market mechanisms to cope with international competition, in particular by introducing policies of deregulation and liberalisation (Cerny 1997; Crouch, Streeck

²²⁹ In fact, there are many criticisms, such as institutional determinism, the difficulty in explaining institutional changes, the lack of attention to the service sector due to excessive attention to skills analysis in a context of manufacturing bias, de-industrialisation and expansion of non-regular employment (Watanabe 2014; Gordon 2017).

²³⁰ The term "trajectory" implicitly refers to the process of convergence. It relates not only to institutional forms, but potentially also to institutional functioning (Baccaro, Howell 2017: 15-16).

1997; Cerny *et al.* 2005b; Coates 2005; Pontusson 2005). Globalisation is a key concept, as well as a political construct driven in turn by neoliberalism (Overbeek 2003: 13-14).

Potentially, this transformation is the starting point for the transformation of the Japanese labour market. The progressively strong need in different areas of the market (manufacturing, services, care) to apply neoliberal economic policies, in a context of almost twenty years of economic stagnation and rampant demographic difficulties, is a determining factor in the strong demand for migrant workers in the national productive system. This process has all the potential to bring Italy and Japan closer to similar structural needs from the point of view of the presence of migrant workers in key market sectors affected by this neoliberal dynamic.

In addition to a purely historical-geographical evaluation by assessing migrants' different channels/countries of origin, this process must also be assessed from the point of view of governments' partisan effectiveness with regard to the policies of arrival and residence of migrant workers, and how these effects may no longer be sufficient in "holding back" the position of the Japanese government on this issue. Although it is sometimes difficult to identify a precise political-ideological division between left- and right-wing governments, as in the various orientations of economic and migration policies (Watanabe 2014: 127), the marked differentiation from the common political path in the 1990s may be a determining element in the diversity of the quantitative (and "qualitative") presence of migrant workers in the two countries. The continuous alternation of government in Italy and the almost constant presence of centre-right governments in Japan since the 1990s could be an element in explaining this difference, in particular the clear opposition of the LDP to accepting (unskilled) migrant labour. An opposition that in recent years, partly due to the pressure of globalisation, certain categories of labour representation and internal market dynamics, has slowly begun to break down (Hamaguchi 2019a; 2019b).

2.9. VoNeoliberalism and convergence

Being directly related to globalisation, some political processes seem to be oriented towards parallel trends. Or rather, more precisely, to a process of diversity within convergence (Cerny *et al.* 2005a: 2). Unlike the VoC approach, the VoNeoliberalism approach does not exclude convergence in favour of a system's divergence, but considers both plausible, in concomitant development (Hülsemeyer 2003). This is attributed to the constantly transforming nature of neoliberalism, no longer solely tied to the rigidity of market orthodoxy of the 1980s, but depicted through new forms

and new balances, in which the simple economic dimension is necessary but not a sufficient condition for change (Cerny *et al.* 2005a: 2-3).

At the centre of the change are political institutions, but also other processes and actors at multiple levels within national systems, which are conditioned by neoliberal economic policies. At the same time, there are similar and well-known consequences within markets, such as their progressive deregulation and liberalisation, greater privatisation of services, outsourcing/flexibilisation of labour, and a general retrenchment of welfare and the power of organised labour. To these transformations must be added the political fight against inflation and a more general economic reasoning of "the market", like cost cutting and productive efficiency, in a perspective of global competitiveness.

The State, however, does not assume a marginal role as it would seem. Despite its increasing departure from direct redistributive forms of welfare, from policy models that support labour, employment, regulation of employment and redistribution of resources and welfare, to the liberalisation of public companies and their privatisation, a decrease in direct support for private companies and less involvement in the management of incentives for the realisation of public works, it is not possible to consider stepping backwards for the State with regard to economic processes. This "new" public approach is more favourable to marketisation, the commodification of services and the investment of foreign capital, unthinkable until a few decades ago. Rather, it is a new alternative form of participation, closer to and similar to the competitive nature of globalisation (Cerny *et al.* 2005a: 3-4).

These processes are apparently common in all countries involved in a given degree of globalisation dynamics, in their institutions, political actors, political, economic and social processes, and business and labour representativeness. Similarly, national peculiarities (at multiple levels), political orientations, and pre-existing competitive advantages drive the divergences already present in the VoC perspective, creating tension between structural and resource constraints (but also political will). Converging drives certain types of inevitable results. As much as these differences remain (and will remain) in operation, a slow process of closure to globalising models and processes is considered inevitable. It is, in fact, implausible to think of national systems totally unrelated to the contemporary global economic and social context, despite the peculiarities of each individual national political-economic system. On the other hand, it is interesting to understand how certain systems, such as the Italian and Japanese ones, can approach certain trend specificities dictated by particular current socio-economic needs.

2.10. What kind of convergence?

This analysis that takes into account the VoNeoliberalism approach in combination with the VoC approach is an alternative to an evaluation that sees the persistence of a well-defined variety of clusters of countries with particular political-economic affinities. The main objective is not to criticise the latter approach. It is also not intended to criticise the classical subdivision into CMEs, LMEs and MMEs, nor their founding institutional characteristics, arrangements and complementarities. The attempt to use the VoNeoliberalism approach is to give a further point of view to the possibility that, even if not thoroughly and potentially limited to some particular processes, there are convergent movements in areas related to (the variable) of globalisation and the prevalence of policies and actions related to broader neoliberal ideas (e.g. the formation of new and more important transnational networks, new economic and political networks, new systems of trade, search for competitiveness, unexpected political coalitions in relation to global and regional economic change, etc.).

The efforts to adapt to globalisation and international neoliberal policies are an expression of the extent to which governments, although belonging to distinct political-economic areas and with their own characteristics of competitive advantages, are in some way and different measures going through a process of convergence. There are also efforts of opposing tendency, of resistance to the neoliberal globalising force, of mixed systems with great importance given to the social components, as well as incomplete and not entirely successful processes of adaptation, but they are, more often than not, unripe, weak or unsuccessful. An example discussed here is that of Japan, emblematic for having been considered in the second half of the last century a possible alternative to the US neoliberal model and at the same time belonging to the CME area; now it seems destined to pursue processes of deregulation and liberalisation too, something unthinkable previously (Cerny *et al.* 2005b; Watanabe 2015b).²³¹ The Italian case, instead, is different but complementary. Being part of the MME area should prefigure a greater push for true deregulatory processes more so than in Japan, but as much as the neoliberal push has fully manifested itself over the past thirty years in both the labour market and the welfare state, it is now less impactful than in the Japanese case (Watanabe 2015b; 2018). Whatever the case may be, it is not a simple imposition (or

²³¹ This analysis can also be applied to other "strongholds" of coordinated markets and neocorporatism, such as Sweden and Germany, where neoliberal rhetoric and policies have led to a radical reconfiguration of economic, financial, and monetary policies, as well as in the field of the labour market (however with the maintenance of their welfare state model) (Cerny *et al.* 2005a: 19-20).

transformation) of LME arrangements on CMEs by neoliberal economic forces, a process strongly rejected by VoC scholars (Pontusson 2005). As already mentioned, the VoC approach categorically excludes any process of convergence between models or clusters of political-economic systems due to globalisation or any other economic phenomenon (e.g. external shocks),²³² maintaining their distinctive logics even in the face of far-reaching economic changes.²³³

There are concrete examples of how CMEs have faced trends of adopting dynamics peculiar to LMEs, or how some deregulatory processes occur at a greater speed in CMEs than in LMEs. This is the case in the skill formation processes framework addressed by Estévez-Abe *et al.* (2001). Basically, the systems of vocational training and coordination between education and the labour market function differently according to the political-economic system to which they belong, fulfilling different needs of the labour market and providing different tools to workers in order to be included and continue their permanence in it. The welfare state, in the specific form of worker protection against dismissal (or restriction of employers' power to dismiss, also known as employment protection) and economic support for workers excluded from the labour market (unemployment compensation), adapts to the specific productive needs of each system.

In summary, CMEs rely on investment by the firm and the worker in training and development of specific, enterprise-based or industry-based, skills. This implies greater risk on the part of the enterprise and the worker in the event of unemployment, having invested time and resources in skills that are difficult to switch to other industries or even different firms, and thus requiring greater employment protection and social protection guarantees. It is also in the interest of the employer, since the presence of incremental innovation is dominant in CMEs, to maintain stability in the presence of its pool of workers and thus have advanced social protection systems. In the case of LMEs, the skill patterns are focussed on general skills, so the interest in employment protection-oriented welfare systems is less. Employers in LMEs, interested in a greater turnover of workers with varieties of skills, and a productive system oriented to radical innovation, do not help the presence of some degrees of rigidity of forms of employment protection. The gist is CME cross-class alliances that have developed between employers and skilled workers for the development, in

²³² The most common ones that can explain institutional and policy changes are globalisation, intensified international competition, and the application of new technologies.

²³³ Soskice's arguments against potential convergence (2001: 125-132), in response to possible "*external shocks emanating from a world economy in which technologies, products, and tastes change continuously*" (Soskice 2001: 62-64), are divided into three arguments in relation to the dynamics of institutional change: the orientation to institutional recreation of comparative advantage occurs at both the national and company levels (in the case of CMEs, interest groups, producers, and voters will push for the maintenance or reactivation of pre-existing institutions); strategic interaction through the use of "common knowledge" leads to asymmetry between different political-economic systems, where there are no constraints on deregulation of CMEs to become more similar to LMEs; institutional complementarities discourage radical change, while at the same time increasing the chances that any institutional reform involving one area will impact on others (snowball style) (Pontusson 2005).

functionalist terms,²³⁴ of social protection systems in their respective welfare states (Estévez-Abe *et al.* 2001).

However, this structural rigidity in the divisions of social protection across clusters seems to be fading. Although the broader division between CMEs and LMEs (in which CMEs welfare systems are more "protection inclined") still holds true, this is not the case across all categories of workers. Regular workers are clearly more protected than temporary and non-regular workers, further increasing existing disparities and dualism. This risk is also affecting, in the medium and long term, regular workers within the same deregulation processes area. A similar analysis can be made in the field of unemployment compensation, in which, despite the fact that here CMEs are less affected than LMEs (even if this is not always true, as in the period 1985-1999 in Europe) as well, in both coordination types the main pattern has been of diminishing social protection institutions. On the contrary, the trend of retrenchment of unemployment compensation schemes has been more rapid in the more generous welfare state systems than in the less generous ones, showing a common political path regardless of the cluster to which the country belongs, antithetically to what has been predicted by the VoC approach (Pontusson 2005).

The same analysis can be conducted for the processes of wage inequalities, whose trends seem to confirm, albeit at different speeds and despite the fact that the dynamics of labour market inequality are quite different between CMEs (more egalitarian) and LMEs (less egalitarian), a slow but steady convergence (Pontusson 2005). The factor that seems undeniable is the presence of similar dynamics that, even in different political-economic areas (not immediately referable to each other), involves transformations and comparable paths. This seems even more true if the variables of globalisation, technological changes and the transformation of industrial societies into service ones are taken into consideration (Pontusson 2005: 185). Thus, this analysis could be turned to other political and socio-economic junctures, such as migration policies connected to the structural needs of different national labour markets.

Welfare states, too, have several points of convergence. Many countries with advanced economies show signs of convergence in health, education, and social work ("care work"). Especially in care work, there is an increase in the employment of migrant women (not necessarily low-skilled) and a common process of commodification of care services. Williams (2012: 365) stated that "*the effect is an infinite diversity of migrant care work that seems to render*

²³⁴ CME industrial relations must prevent (or at least discourage) the poaching of skilled workers by firms, while at the same time encouraging cooperation between capital and labour (Hall, Soskice 2001a: 24-25). Functionalism consists of the avoidance of perceived risks versus the supply of skills through the help of strong institutions (employment and social protections) (Heyes *et al.* 2012: 232).

generalisation and cross-national comparisons difficult". Although this process is more evident among regional care economies than among global welfare regimes (Hay 2004), neoliberal policies have brought social democratic and liberal regimes closer together in the provision of child care (Mahon *et al.* 2012). The "care convergence" involves all welfare regimes, especially low wage, low status work in care performed by migrant women (Lightman 2018). As with the other areas of analysis, globalisation is the driver of this change.

A final convergence may be on the level of industrial relations dynamics (Baccaro, Howell 2017), especially because of the weakness of the state in dealing with neoliberalism and multinational corporations (Crouch 2011). States (and politics), in the VoC approach, are often excluded from the analysis or considered less influential than market institutions or the overall role of firms (Meardi 2018: 632). However, in this case, scientific evidence seems to be complementary to a more complex trajectory of change rather than a true system convergence (Meardi 2018: 633). Industrial relations seem to possess a greater degree of autonomy from convergence phenomena, both in the economic and political dimensions (Meardi 2018: 636).

A recent, concrete example that sums up these processes of confluence has been the policies and structural reforms adopted by different governments to face the economic crisis of 2008, independently of the political-economic area to which they belong. Although the responses to the crisis have been partially different, in pace, intensity and degree, the trends (and inspiration) have been extremely similar. The search for deregulation, *de facto* weakening labour against capital both in terms of employment protection and a more general cut in resources dedicated to welfare,²³⁵ has been common to all existing varieties of capitalism.²³⁶ This resulted in a general weakening, in a non-homogeneous manner, of social protections in CMEs, MMEs and LMEs, even if less strong in the first type. Again, the crisis of 2008 did not result in a true convergence into a single system of capitalism, as the distinctive differences of the various political-economic clusters persisted and made their own peculiarities a unique means of "facing" the pressure of globalisation and the

²³⁵ In Italy, the 2008 crisis has given more weight to the bipartite agencies formed by employers and trade unions (in Italian "*enti bilaterali*"). These are joint bodies, associations between non-profit business organisations and trade unions. There are several areas of intervention of the bilateral body: from training and professional updating for workers and entrepreneurs, to the development of employment, to social protection (CISL 2015). CISL, among all three main Italian trade union confederations, was their main proponent). One of their (new) purposes during the crisis, was to favour corporatist social provision, strongly desired by the Berlusconi government in 2009-10, in order to de-nationalise the social services of the welfare state. In this way, state intervention was made subordinate to an initial intervention of corporatist subjects (Sacchi 2013: 199), to some extent lightening and de-empowering the social protection role of the state.

²³⁶ It is interesting how governments have acted against the economic crisis in two different ways and in two distinct phases: in the first phase, a massive injection of fiscal stimulus was sought, through an increase in government spending and a cut in taxation; the second phase, on the other hand, was characterised by fiscal austerity, leading to a cut in government spending and a consequent increase in unemployment and decrease in employment and social protections (and unemployment benefits) (Heyes *et al.* 2012: 229-230).

neoliberal push (Heyes *et al.* 2012: 235-236). However, no matter how different the speed of adaptation and policy content, the transformative trends during the economic crisis proved to be in line with what has been hypothesised above.

It is now necessary to explain deeper two terms found several times during this research work, but that were never fully explained and contextualised: the concepts of globalisation and neoliberalism.

2.11. Globalisation and its effects on national political-economic systems

The concept of globalisation has already been mentioned in the first part of this study. In addition, an in-depth description has already been presented in the previous chapter. To recapitulate, it is the set of interactions of an economic, political and social nature that takes place across national borders, impacting national systems in many complex ways. However, it is also more than that. The interactions are not only from outside to inside across porous national physical boundaries, but also from the inside to the outside of them. Globalisation-related processes are in turn remodelled by national, domestic, and regional policies, and the (unique) particularities of each economic and political area involved (Cerny *et al.* 2005a: 4-6).

Using a more orthodox definition, globalisation can be defined as a phenomenon caused by the intensification of economic-commercial exchanges and international investments on a global scale which, in the decades between the 20th and 21st centuries, have grown faster than the world economy as a whole. The further consequence is a tendency towards an ever-increasing interdependence of national economies, which has also led to social, cultural, political, technological and health interdependencies whose positive and negative effects have planetary relevance, like uniting trades, cultures, customs, thoughts and cultural assets (Le Garzantine 2011). With the help of a famous metaphor, it is possible to say that globalisation sees the world as a single social, economic and political space, while societies are moving towards a "borderless world" (Ohmae 1990). According to this view, the State is hypothesised to be destined to gradually lose its ability to manage and adapt to economic situations (Cerny *et al.* 2005a: 4-6).

The influencing power of globalisation is found at multiple levels: politics is effected in the way public policies are produced and in how parties and coalitions are formed and constantly changed; capital and its representatives, whether they are formed by large firms or small and medium-sized companies, must adapt to changes in production and business styles; labour has to

face transformations in employment, work styles, and wage structures; its representatives have to adapt new bargaining structures; consumers see changes in their purchasing power and their choices about what and how to buy (Cerny *et al.* 2005a: 1). Globalisation is also seen as a "deterritorialisation" process: territorial forms of government and politics are in constant tension with economic, political, and social activities, which in turn have lost their traditional territorial ties (Scholte 2000).

Globalisation, as considered here, is, however, something more complex and multidimensional. It can be seen as the set of interactions over time between a wide range of political, social and economic dynamics, together with internationalisation processes²³⁷ and transnationalisation mechanisms²³⁸ interacting with national realities to varying degrees.

Globalisation is thus a process that unites national and international, facilitating common paths, governance and policies of various kinds, coming to "shape" people's behaviour on multiple levels. The nuances between international, transnational, national, domestic and local are increasingly uncertain, rarefied and their dimensions more interdependent. It connects and links not only political and economic areas horizontally, but also socio-economic systems and people vertically. The approach is not only "outside-in" and "top-down", but is also partly "inside-out" and "bottom-up", in a process of internalising globalising factors in order to exploit competitive advantages, favourable practices, political goals and economic means to achieve them (e.g. with production processes, the introduction of new technologies, financing of markets, etc.). The same dynamics are applied to socio-economic institutions, which together with political processes, exploit the modifying power of globalisation through politics to gain benefits and maintain their credibility and competitive advantages.

Contemporary political and economic systems, particularly advanced industrial economies, are undergoing another important effect caused by globalisation: a trade-off between the level of employment and the level of inequality.²³⁹ Generally, the association is between generous employment protection and/or unemployment benefits legislation (strong institutions) with lower rates of inequalities (but also sometimes higher rates of unemployment), while conversely lower employment protection is associated with higher rates of inequalities (application of neoliberal

²³⁷ It is basically a series of formal and informal mechanisms of integration and cooperation between states, such as through international institutions, treaties, etc. (Cerny *et al.* 2005a: 5-6).

²³⁸ It is a series of formal and informal processes and structures among those who are considered "behind-the-border actors". These actors range from economic and market institutions (firms, trade unions, employers' associations, etc.) to socio-political associations and organisations (NGOs, pressure groups, etc.) or national and international socio-cultural linkages (Cerny *et al.* 2005a: 5-6).

²³⁹ Unlike the traditional trade-off between unemployment and inflation, as assumed in the Phillipps curve in the 1970s (Boix 1998).

policies) (Magara 2013: 13). In the Italian and Japanese cases, in the midst of the neoliberal trend and in order to contain their high public deficits, several neoliberal welfare policies have been implemented since the 1990s, including reforms on social security, pensions, health insurance systems and deregulation of the labour market, with often unsatisfactory results. These political-economic dynamics have led, albeit in a differentiated manner but in line with other advanced industrial countries, to an increase in rates of inequality in almost all areas of social segmentation (OECD 2021b).

2.12. Neoliberalism: definition and origins

Another notion often mentioned in this study is what is known as the concept of neoliberalism. Before providing a definition of it, it is useful to explain what has preceded it, i.e. liberalism. Liberalism, which later "evolved" into neoliberalism, does not have a single and shared definition. Instead, it encompasses different contents and definitions in relation to different historical and geographical contexts. Although the focus always circles around the centrality of the individual and the concept of freedom, liberalism fluctuates from anti-state values close to the capitalist right as in the European case to a more moderate and centre-left concept in the U.S. case (Cerny *et al.* 2005a: 9-10). Liberalism and neoliberalism can be united by the legacy built by Woodrow Wilson and the League of Nations, namely the formation and relevance of international and intergovernmental institutions that, through the tradition of liberal internationalism, strive for collective security and the expansion of common rules embedded in international law. The system of international economic institutions established at Bretton Woods (1944-1971) is an obvious example of economic liberalism, encapsulating within it several different styles and policies (from German neocorporatism to U.S. domestic liberalism, to Keynesian macroeconomic policies, etc.). Another one of the most important examples of this international common sharing is the United Nations Universal Declaration of Human Rights (Cerny *et al.* 2005a: 9-10). However, neoliberalism stands in contrast to, for example, state interventionism as in the case of the Bretton Woods Agreements.

Neoliberalism is more likely to be traced back to the classical concept of liberalism, the continental European notion of the 19th century. In this sense, the focus is still on the market, the fundamental institution of modern capitalist society. The main institutions are those market-led and market-based, but also more general deregulation and liberalisation of the labour market, greater privatisation of services and public enterprises, less dependence on welfare systems and a more

pronounced individualism with market-oriented behaviour at the centre (Cerny *et al.* 2005a: 10). The main practices adopted by national governments and international institutions focus on market-oriented processes, in the context of relaxing barriers to international trade and the flow of capital and people, in the constant search for economic and productive efficiency. The market must be global, as it has the greatest number of market actors (Cerny *et al.* 2005a: 11). In addition, other core drivers, particularly linked to free trade, are financial liberalisation and the internationalisation of production, with a pronounced tendency towards increasingly facilitating the international flow of capital, goods and services (but not always people).

The evolution and concretisation during the 1970s and 1980s of the conservative neoliberal policies of Thatcher and Reagan further stiffened these practices, causing a number of severe social disruptions in some key economic areas (in particular, financial and economic crises in developing countries and democratic transition ones), without, however, developing an effective counter-trend to this dominant model. Neoliberal governments, as conceived here, forcibly departed from their post-war vision of full employment, favourable tax systems and welfare state central to the redistribution of wealth and the central role of the industrialisation process and economic growth. Conservative neoliberal governments have moved away from the concept of forced state regulation, particularly in the direct (also indirect) management of economic sectors or the provision of many social services. This transformation has also led to an increase in the outsourcing of public services (or the creation of public and private partnerships) (Cerny *et al.* 2005a: 11-13). Neoliberalism dominance during the nineties is explained by the definitive shift of power balance between capital and labour, due to the new transnational configuration determined by globalisation. Among the determinants of this political-economic decade are the crisis and collapse of socialism (1989-1991), the creation of the "Washington consensus", and the establishment of the World Trade Organization (WTO) in 1995 (Meardi 2018: 634).

Back to the definition of neoliberalism, it is commonly described as a political project that involves the state (Jessop 2002) and aims to "achieve a market order" (Baccaro, Howell 2017: 16). This goal is implemented by restoring the power of elites through the expropriation of the lower classes (Harvey 2005), thus promoting market competition and limiting the influence of the state (Schmidt, Thatcher 2013). A peculiar process constantly sought by all neoliberal governments is to contrast and possibly control inflation through the use of monetary and fiscal policies, such as private and corporate taxation. In addition, the efficiency of the standards of economic institutions, state agencies and bureaucracy are sought in order to converge towards the quality of the private business system. This series of changes can be summarised by the idea of embedded financial

orthodoxy of the neoliberal state (Cerny *et al.* 2005a: 14-15). Regardless of how it is defined, there is no single interpretation or notion of neoliberalism, and many of these versions adapt to the specifics required by states or different new social needs (as in the case of social neoliberalism).²⁴⁰

Another interpretation of the term neoliberalism, more related to the concept of financialisation²⁴¹ and the growing importance of finance in capitalist economies, stems from the direct application of policies designed to solve the economic international problems of the 1970s, which continued throughout the latter part of the century. In this case, Harvey (2010: 10) described neoliberalism as a "*class project that coalesced in the crisis of the 1970s*" and with it came "*legitimised draconian policies designed to restore and consolidate capitalist class power*", whose main objective is to exploit state power to gain advantages and protection for financial interests. Gamble (2009: 78), also defined neoliberalism in a manner close to Harvey, stating that "*neoliberalism gives priority to capital as money and therefore to the financial circuit of capital rather than to the production circuit*" (Heyes *et al.* 2012: 224).

Consequently, the position of labour also becomes subordinate to that of finance and capital. Financial capital, in order to gain the best competitive advantages and seek maximum profitability, must be accompanied by precise internal mechanisms in the labour market, including deregulation and flexibilisation of the market, retrenchment of the welfare state, and weakening of the power of labour representation and collective wage bargaining (with a considerable increase in risk for workers in order to maintain the level of general consumption) (Heyes *et al.* 2012: 225-227).

In Italy and Japan,²⁴² the neoliberal transformative process (and the pursuit of neoliberal economic reforms) can also be seen as a possible reshaping for new forms of a dominant social alliance under globalisation. This implies a deeper and more complex analysis than a simple reaction to exogenous economic factors brought about by the processes of globalisation (Amable *et al.* 2011). Neoliberalism is all-encompassing and it has also "hit" the potential bulwark of worker protection. In fact, the focus of Italian unions is no longer solely on protecting workers, but also on

²⁴⁰ Social neoliberalism is a version of neoliberalism characterised by the promotion of competitiveness also for SMEs, forms of environmental and labour standards in trade, new welfare reforms, new discourses of global governance, accountable international rules and procedures, the increase of public legal internationalism, transnational neocorporatism through collaboration with business to promote social goals in a kind of transnational neocorporatism (e.g. Kofi Annan's Global Compact), etc. (Cerny *et al.* 2005a: 17-18).

²⁴¹ The term financialisation incorporates a variety of interpretations. Some interpretative examples are: the merger of industrial capital and banking, clearly favouring the interests of finance; a greater overall autonomy of finance; and the extension of finance to encompass a greater number of actors by inserting them directly into the financial market through the use of new financial means and products (Callinicos 2010 in Heyes *et al.* 2012: 224).

²⁴² Due to its particular nature, the Japanese-style political historical capitalism model, the so-called "1955 system", has proven to be more vulnerable to neoliberal push than other CME countries. The greater strength of labour in CME systems is due to the greater political strength of labour and legislations designed to institutionally protect workers. This arrangement has proven to be a good barrier against neoliberal pressure and changes in financial market structures (Ido 2013: 143). Japan, due to its inherent labour side weakness, has not positioned similarly effective defences.

providing services to workers (and non-workers). The efficiency of these services is as important as the safeguard of labour (Interview with the UIL Vicenza Provincial Secretary 2021). This shift in priorities suggests that the neoliberal pressure also impacts on the side of labour representation, placing it fully into the competitive system of the liberalised services sector.

This section concludes the chapter. Below are the conclusions and a brief recap of the methodology used for the interviews featured in the later chapter.

2.13. Conclusion

This chapter has explored the topic of migrant workers and their specificities in the Italian and Japanese economic systems. An overview of the role of the actors in the respective industrial relations was presented according to the presence (or absence) of foreign workers in the respective national productive fabric. As outlined above, trade unions, employers and the state are at the core of a country's economic reality, and their relationships are often the determinant of the labour market and foreign labour policy choices.

Although a clear contrast has been drawn between the two national structures, which is necessary in order to understand the peculiarities that characterise these two political economy arrangements, it has presented only a theoretical and almost "inelastic" vision of the overall framework, lacking the nuances that trade unions, employers, their representative associations, and the state see and foresee for the present and future of their labour markets.

In the third part of the chapter the comparison between the VoNeoliberalism approach was presented as opposed to the VoC perspective, in order to evaluate a different prospect on a hypothetical process of convergence between different political-economic regimes. While this analysis is still premature from an analytical standpoint, it offers a different perspective than the VoC one on the future of varieties of market economies and the current socio-economic transformations.

In the next chapter, how specific actors in the two economic regimes deal with these issues and how they influence migration and labour policies will be discussed in more depth. This will be done through a series of interviews carried out during the present research project, both in Italy and Japan. The main theme will be an assessment of the future of the Italian and Japanese labour markets, with that of the possibility of convergence dynamics linked to the foreign labour variable.

2.14. Interview methodology

The methodology for the empirical part of the thesis will follow a non-standardised approach of qualitative, in-depth interviews with representatives of the respective institutional socio-economic elites. The interviews are part of a paradigm that tries to address the problems qualitatively, as an in-depth understanding of the actors involved, i.e. trade unions, employers' associations and the state. The questions will be semi-structured and implementation takes place during the three years of Ph.D. studies. The subjects will vary from national representation associations to institutions with regional and provincial representation, to identify differences dictated by the various perceptions of the problems and by different contexts. This type of sampling was decided to guarantee a certain margin of "comparative potential" (Barbour 2007: 53).

The choice of using semi-structured interviews is to give as much margin of response as possible to the interviewees while maintaining a similar structural scheme for all of them. The main intention is not only to obtain answers to the questions but also to fully understand mental categories and nuances within the dialogues (Corbetta 1999).

Concerning the specific method adopted in structuring questions, identifying contacts and conducting interviews, the approach adopted is that of responsive interviews as described in Rubin and Rubin (2012). This specific choice, as well as the use of a semi-structured format in questionnaires and interviews, is dictated by the need to obtain in-depth interviews that have a certain degree of flexibility in design, providing the possibility to change the questions between and during the interviews, and thus entering into the details and experiences of the interlocutor (in Rubin and Rubin's case known as "conversational partner"). The purpose of this particular interviewing approach is to ensure that the results will be "fresh" and "real", conclusions "balanced", "thorough", "credible" and "accurate", and that the final report will be "rich" with ideas while trying to reflect the "world" of the interviewee as much as possible (Rubin, Rubin 2012).

Chapter III: Institutional actors' preferences, strategies and future predictions on labour migration. Interview analysis and considerations

3. Introduction

An important topic present in the Varieties of Capitalism literature and more generally in the political comparative economy studies is that of how different modes of market regulation shape migration policy preferences. This research area is found specifically in the regulatory modalities of market institutions, that is, how they influence the political choices of central governments on issues such as labour shortages, labour demands and consequent choices of migration policy to respond to these market dynamics. Different market economies of each OECD country, according to their preferences and competitive advantages, have relied on two instruments in order to meet the structural economic demands of their domestic labour market: training and skills development, thus forming different training regimes and levels of vocational coordination, and immigration, making different choices of migration policies (Toner, Woolley 2008: 48).²⁴³ It is macroeconomic conditions that arrange political-economic choices, including migration policies. Expansionary economic environments produce a greater demand for labour and a greater need for liberalised migration policies, while recessionary economic environments produce an excess of labour and a tightening of entry policies (Massey 1999: 310). Financial markets, too, determine national-level labour supply decisions, and thus migration policy choices. Short-term dividend interests on the part of shareholders, typical in LMEs, push for quick market arrangements and have less interest in training investments, so as to have easier access to the stock market for capital. CMEs, on the other hand, have longer-lasting relationships with banks, allowing for lengthy-term investments based on company value and increased market share (Hall, Soskice 2001a: 22-23). LMEs, being less interested in intra-firm skill formation due to a more rapid need for profit, will be more reliant on liberalised migration policies, unlike CMEs. The latter will be less dependent on migration policies.

Different national production strategies, too, influence national migration management. The demand (qualitative and quantitative) for labour depends on employers' preference (and to some extent union), and the type of market economy shapes these choices (Hall, Soskice 2001a; Statham, Geddes 2006; Menz 2009). It can be summarised that the set of production strategies of firms (or

²⁴³ Or to external mechanisms such as poaching workers from other firms, especially in LMEs (Hall, Gingerich 2009: 460).

corporations), the sectoral composition of the economy and the regulation of the labour market are different according to the specific market economy system, which in turn influences migration policy strategies according to the market's demands (Menz 2009). CMEs, such as Japan, are expected to prefer highly skilled foreign labour, MMEs such as Italy, on the other hand, require more diverse labour to compensate for the needs of the highly segmented labour market (albeit to a lesser extent than LMEs). This mechanism is particularly stressed in the lower strata of the labour market.

MME systems deserve additional consideration. Governments in MMEs adopt migration policy measures reminiscent of those in CMEs and LMEs, albeit in a differentiated or fragmented manner. Labour migration policies in MME countries aim to differentiate recruitment between high and low-skilled foreign workers in order to meet the needs of the highly segmented labour market at both ends of the skill curve (Piore 1979). While high-skilled foreign workers are sought in the upper area of the labour market, making MME countries international competitors for this kind of human resources, low-skilled workers, including undocumented migrant workers, proliferate in the lower area (Menz 2009). Inside the MME cluster, especially in Southern European countries, there are marked sub-variants with important specificities. Specific sectors of the labour market have the presence of high value added high-skills "islands" in manufacturing, production agglomerations that closely resemble CME productive features. Another characteristic is the high relevance still held by agriculture, accompanied by the importance of the service sector and manufacturing. The role of the state is more of a coordinating and enabling rather than a dominant and *étatiste* one (Schmidt 2002; Amable 2003). In the Italian case, the picture is completed by the imposing grey area of the labour market dominated by informal, irregular and often foreign-born labour (Baldwin-Edwards 2002).

In recent years, political tendency has been on the rise (and electoral fortune) in populist and far-right political formations (Minkenberg 2000) and a more pronounced counter-movement to the acceptance of migrant workers, a mechanism accentuated now during the global pandemic of Covid-19. At the same time, the regulation of labour migration policies is one of the most relevant (and disputed) public policy issues in almost all OECD countries (Ruhs, Anderson 2010: 1). However, especially from the second half of the 1990s to the end of the 2000s many countries with advanced economies have had, albeit to varying degrees and durations, a common convergence in the preference for the use of migrant workers over training policies and some degree of convergence towards migration policies commonly found in LMEs. These migration policies have been characterised by employment-related choices. Although this trend was most evident in the

LMEs, a slightly more liberalising transformation force was perceived in MMEs and CMEs, too (Wright 2012).

Japan, like Italy, had seen a decade of transformation of its immigration policies since the second half of the 1980s to the beginning of the 2000s. Japan, in response to pressure from firms and the labour market, made a historic amendment to its immigration law (1990), allowing people to come in through the side and back doors. This was the case of the *nikkeijin*, trainees and technical interns. In Italy, migration policies saw alternating phases, but the same period was a moment of legal adjustment and creation of a more organic and regulatory legislative body, responding (partially, also through *sanatorie*) to the needs of the labour market. In a context of particularly worsening demographic dynamics, Japan and Italy are, in the same way, maintaining a harsher stance on migration policies, at least compared to LME countries that make liberalisation of the labour market their competitive and comparative advantage (Wright 2012). Japan and Italy's migration policy choices can be explained from the VoC perspective, where different characteristics of market regulation can determine migration policy preferences.

It is interesting to understand how market institutions shape political decisions on migration policy while considering the role of all stakeholders in market regulation central. This is, ultimately, the purpose of the elite interviews conducted in Japan and Italy, so as to have a better and potentially different insight into how the representatives of capital and labour are linked by socio-political relationships and act together within a context of "varieties of capitalism" that is not always stagnant nor is it defined completely. Moreover, although it cannot be defined as exhaustive, it can provide some insights into future trends and the feasibility (or desirability) of a convergent transformation of the Japanese system towards a system that most closely resembles a mixed market economy, in particular on the issue of migration policies addressed to meeting the economic demands of the labour market.

3.1. Labour migration and institutional actors

Labour (im)migration is one component of a series of internal transformations within (and between) countries. Economic actors are affected in different ways, and in turn, push to influence migration and economic policies for different purposes. The most common strategy is political lobbying, to shape migration policy outputs (Haus 2002; Watts 2002). Governments experience a political-economic tension over opposing values, on the one hand neoliberal pressure aiming at greater

market liberalisation and deregulation, on the other hand neo-mercantilist protectionist processes (sometimes with a more restrictive populist approach). This combination, summarised in the concept of the "competition state", aims at the creation of an environment conducive to economic prosperity, especially for business. Capital, composed of employers and the associations that represent them, use migrant workers as a contrast to the difficulties found in the domestic workforce, such as skill set deficits in the national labour or workers no longer interested in being employed in the lower segments of the labour market. The approach of the employers' associations is pragmatic, functional to business needs, often calling for more "open" migration policies to ensure economic competitiveness. If the labour and skill sets they need are not present in the domestic labour force, they require (more) foreign labour. They look for them elsewhere, in labour markets that have produced those specific skill sets (Ruhs, Anderson 2010:15-17). Nevertheless, it is also important to consider the framework in which employers operate, i.e. the labour market. Each labour market has its own specificities, and each of its components (production fabric, size of firms, presence of industrial districts, number and type of sectors, degree of segmentation) has its own peculiarities, probably different from those of other countries (Peck 1996). These differentiations are critical to understanding the determinants of the decisions employers make. Labour, on the other hand, has undergone the most radical changes, having to (to varying degrees) abandon its historical recalcitrance towards low-skill migrant workers, considered a potential risk of worsening the general working conditions of native workers, to also embracing a sort of tension between protection of represented workers and broader, all-encompassing protection of labour *tout court*, including foreign workers. Unions have often shifted from strongly protectionist positions towards the domestic workforce to a broader search for better working conditions and wages on equal (minimum) standards for all (Menz 2009).

Labour migration's key actors with their relative power *vis-à-vis* their domestic governments (Menz 2009) play a fundamental role in the entire political-economic process. Employers' associations (Castles, Kosack 1973) and trade unions (Castles, Kosack 1973; Haus 2002; Watts 2002) are ultimately the two most relevant non-state actors in the drives for change and political pressure on migration policies. Moreover, the simple dichotomy between capital and labour in the stance towards immigration is often anachronistic and almost never antagonistic (Menz 2009). As major (non-state) economic institutions and actors, they have different preferences and interests, for instance in the presence (or absence) of migrant workers, in setting national and/or sectoral entry barriers, in their social and market integration, in compensating for domestic labour difficulties (labour shortages or skill shortages) and in answering to labour market needs. While their interests

derive from the peculiarities of the national labour market and the comparative advantages of the market economy system, their ability to do so depends on their organisational characteristics and often their channels of access to government policy (for labour to resist employer initiatives, too). Their degree of access, instead, in addition to their internal organisational characteristics, is based on the institutional framework of the state-society nexus. This latter factor refers to institutionalised forms of dialogue between governmental and non-governmental actors, that are located along the pluralism-neocorporativism continuum (Menz 2009). Italy is a country where this kind of dialogue is possible because of neocorporatist patterns and institutions of interest intermediation, where capital and labour are potentially more involved in migration policymaking (Penninx, Roosblad 2000). In the Italian case, both unions and employers have considerable influence in official (and less visible) forms of trilateral consultation and even co-decision, particularly regarding entry quotas and labour market sectors affected by the potential arrival of migrant workers. Lobbying is therefore a fundamental feature of Italian industrial relations, a process facilitated by the presence of a well-developed (but sometimes conflicting) network link between the different actors. It is no coincidence that employer representation and the main Italian confederations are considered influential players in shaping the design and modification of migration policies (especially quotas), and are often invited to comment on draft legislation by the government and received periodically for consultation meetings ("*consultazione tra le parti sociali*") (Menz 2009). They represent the privileged actors the government needs as they possess detailed specialist knowledge on the labour issues and are at the forefront of the labour market.

This form of institutionalised dialogue in Italian industrial relations has, however, come to an end over the last decade, coinciding with the loss of "power" of the social partners (especially trade unions) *vis-à-vis* the various governments (including left-wing ones). It could be inferred that the neocorporatist model has gone backwards, with a process of progressive exclusion of trade union decision-making even with potentially "politically-friendly" governments. While the models described above were respected by the centre-left Prodi II government (2006-2008) and the subsequent centre-right Berlusconi IV government (2008-2011), the former with an extensive involvement of the social partners while the latter with a strong unilateral decision-making component, since the centre-left Renzi government (2014-2016) the trade unions have played an almost conflictual role with the government (Ambra, Carrieri 2017). This process of institutional weakening continued at least until the "yellow-red" Conte II government (2019-2021),²⁴⁴ to further improve with the current Draghi government (2021-present), at least in the recognition of the role of

²⁴⁴ More form than substance.

the confederal trade unions (interview with Mr. Galossi, INCA CGIL 2022). The decision-making approach of the Renzi government has led to open conflict with the confederal trade unions, especially with CGIL and UIL (e.g. with the labour market reform, the so-called "Jobs Act"),²⁴⁵ as well as through a generalised disavowal of the role and importance of "intermediate bodies" (trade unions, trade associations, parties, etc.).²⁴⁶ Actually, even if during the centre-left Letta government (2013-2014), state, trade unions and employers' organisations there was a show of balance between state, trade unions and employers' organisations, already since the previous technical Monti government (2012-2013), which is mostly identified with the introduction of austerity measures, government and trade unions are involved in a highly turbulent phase. One example is with the Fornero pension reform (Law No. 92/2012). Basically, due to the economic crisis and the resulting problems in the labour market, the unilateral political decisions of various governments (regardless of whether they are oriented towards the political right or left), the separate agreements between governments and only some union confederations, has resulted in the general weakening of the Italian union structure and its neocorporatist practices, as well as unions' political influence on migration policies (Della Puppa 2018).

Unions, especially after the transformations since the 1970s, have generally moved towards broader values such as equal rights, anti-discrimination and integration of migrant workers, rather than on the management of entry channels (Krings 2010). In Italy, the reaching out attempts to organise them are much more structured and consolidated (Watts 2002) than in Japanese unions. Although the backbone is still made up of enterprise unions, sectoral federations and national confederations are forced to confront the transformations of both the labour market (new sectors, new jobs, new contracts) and labour. The "cost" of new values such as equal rights has been the distancing from the traditional role of simply regulating and monitoring labour entries, also via opposition to the recruitment of new labour migrants (Penninx, Roosblad 2000).

What determines capital and labour preferences? First of all, one must consider the characteristics of the labour market. In highly dualised economic contexts, employer representation and unions have less influence in the lower tiers, even though the latter possess greater (growing) interests. Their strength is limited in the representation of these sectors because regulation is more

²⁴⁵ The reform was divided into two measures: Decree-Law No. 34 of 2014 (also known as the "Poletti decree") and Law No. 183 of 2014. The reform was completed in 2016.

²⁴⁶ The term "intermediate bodies" (in Italian "*corpi intermedi*") refers to social formations along an ideal line from the citizen to the institutions, i.e. organisations legitimately entitled to assert the interests of citizens in the name of and on behalf of their communities.

fragmented and often bypassed by informal dynamics.²⁴⁷ In the lowest stratum, where many undocumented foreign workers are present,²⁴⁸ unions can act in an even more limited way, without being able to politically advocate for undocumented work or irregular migration (Menz 2009). National migration management, within the VoC framework, depends on institutional differences, production strategies and overall combinations that determine the characteristics of market economies. Societal transformations play an important role, particularly the declining role of manufacturing and agriculture and the rising importance of the service sector (Menz 2009).

The choices and preferences of capital and labour must therefore be distinguished. Employer preferences can be summarised as follows: in a first VoC approach, LME employers will need migrant workers with general and transferable skills that can be easily incorporated into flexible business strategies, CME employers will be more interested in migrant workers with specific (sectoral and firm-based) skills, while MME employers will implement attempts to imitate LME or CME employers' strategies based on their structural needs. The LME generalist education system is conducive to the arrival of both high-skilled and low-skilled workers, while the CME system, which is more developed on the vocational front, has a greater need for high-skilled workers to be included in high value-added production patterns.²⁴⁹ The MME case, and consequently the preferences of employers, must be evaluated on the basis of the specifics of each country's political-economic system. According to a similar type of approach, employers consider the relative size of each labour market tier, thereby determining the characteristics sought in the foreign labour. Generally, in LMEs, employers are more interested in "filling" the void left by the native workforce in the service sector, while in CMEs, in addition to the same need as LMEs in the service sector, they also need labour in the secondary sector. Where agriculture is still an important economic feature, employers will press for a general liberalisation of migration policies in the agricultural sector as well (Hall, Soskice 2001a; Thelen 2004; Menz 2009).

Unions have to get to grips with yet other considerations: the decline in unionisation rates, together with the transformation of the labour market into a more segmented structure and progressive privatisation of public sector enterprises, one of the union's historic pool of members, have led to an attempt to approach the foreign workforce in a more inclusive way. The need for new

²⁴⁷ Exacerbating the union position is the system of subcontracting chains that have further fragmented contracts and workers' rights (Menz 2009). In particular, this is generally more present in the service, transport and agricultural sectors.

²⁴⁸ The Italian case is emblematic for the high percentage of irregular workers. The value of irregular work in Italy is estimated to be around 77.8 billion euro, for an approximate 3.3 million undocumented workers (CGIA, Confederazione Generale Italiana dell'Artigianato 2020).

²⁴⁹ However, this ideal division is susceptible to economic change. In fact, even CMEs are increasingly inclined to rely on skills built abroad, especially in terms of labour flexibility (in recruitment, contractual and in-country stay) (Menz 2009).

labour to strengthen its ranks has yielded to the need for protectionism towards native workers, at least for a simple quantitative consideration. The development of values aimed at equal rights (employment rights, equal pay, working conditions, anti-discrimination laws, values mainly present in the labour market but not limited to it), has determined a clear opposition of the unions to the economic instrumentalisation of migrant workers. For example, labour representation generally opposes the inclusion of foreign labour in the lowest strata of the labour market, in order to avoid a race to the bottom with native workers (Penninx, Roosblad 2000).

In light of a more neutral position²⁵⁰ on the part of Italian employer representation (Confindustria),²⁵¹ generally favourable to coordination with labour on the issue of labour migration management as they are less involved in representing SMEs (the main employers of migrant workers), for labour the issue is potentially more complex. The main Italian union confederations (CGIL, CISL, UIL), more accustomed than the Japanese unions to the influx and presence of foreign workers in the domestic labour market, has historically had an immigration-friendly stance (Watts 2002). Since foreign workers are an integral part of the union organisation as core clientele and also as employees (though not in decision-making roles, where they are generally underrepresented (Basso 2004)), Italian unions have always been politically active in their favour, often becoming vocal advocates for immigrants' rights (Jacobson, Geron 2011; Connolly *et al.* 2014; Marino *et al.* 2017). Although the focus of unions is primarily on legal labour migration, they generally also take a position on protecting migrant workers as a whole and pushing for regularisation of undocumented migrants (Menz 2009), in particular with a monitoring function to ensure that they are not used to apply downward pressure on wages and general working conditions (Watts 2002: 73-79). However, criticism has been levelled at the confederal trade unions in relation to these positions. Especially since the economic crisis of 2008, trade unions have reduced their protection activity with respect to the migrant component, becoming instead mere service centres

²⁵⁰ Over the years, Confindustria's stance has changed, but it has always remained neutral and functional to business. For example, during a recent video conference (20/04/2021) between Confindustria President Carlo Bonomi and Prime Minister Mario Draghi, the topics of the macroeconomic framework proposed by the Economic and Financial Document (DEF) were discussed, the most urgent measures for businesses and the National Recovery and Resilience Plan (PNRR). Bonomi added that "*at the end of the DEF there is a chapter that outlines the risks for GDP and social security accounts if the frightening demographic curve that afflicts us, and the need for regular flows of immigrants that we need, are not addressed with radical long-term measures*" (Confindustria 2021a, author's own translation).

²⁵¹ Equally important for Confindustria is being able to modify the lists of out-of-quota occupations as needed, as well as encouraging the entry of workers with high qualifications. In addition, Confindustria hopes for the implementation of openness and reception policies that must have a measure that follows social and economic sustainability, without renouncing the effective control of the borders and the territory or renouncing the setting of entry quotas (through a medium-term planning of three or five years, calculated on the basis of demographic trends to be adjusted annually *ex-post* on the basis of the actual evolution of the explicit demand) (Confindustria Centro Studi 2016).

for their members (Mometti, Ricciardi 2011; Della Puppa 2018),²⁵² in a more general process of commodification of trade union representation.

Summarising what has been analysed so far, the role of employers' associations and trade unions is often important in shaping migration policies, especially strategies for recruiting a foreign workforce. Through lobbying actions, they can modify and shape migration policies with reference to the needs of capital and labour, and they can also partly manage foreign flows and labour within the national territory. Employers opt to create political pressure for the presence of migrant workers to complement the needs of the different sectors of the domestic labour market, thereby strengthening pre-existing economic structures through distinct labour recruitment strategies. Migrant labour is mostly a counterbalance to native labour shortages or labour market skill shortages. This is addressed at all levels of the segmented labour market (both high and low skill), albeit with appreciable variation by market configuration.²⁵³ Trade unions are generally sympathetic to the positions and (economic) demands of capital, specifically preferring economic migration that is coordinated between the social partners and possibly regular managed migration. In fact, irregular migration is seen as a potential instrument of disintegration of labour market structures and conflict within labour (Menz 2009). One more issue that unions, both Italian and Japanese (but generally of any nationality) face is that of internal divisions and potential tensions with their representatives. Internally, especially at the confederal level, the divisions are both organisational and ideological, thus forced to coexist and mediate between different in-house ideological currents (between federations, sectors, regional and local branches), sometimes highlighting a poor internal cohesion. Tensions at the grassroots level, on the other hand, also present intra- and inter-federal diversities (Cillo, Perocco 2014). This is the paradox of the perception of the migrant workers as a potential obstacle and downward equaliser of wages and working conditions, as well as a dangerous competitor in areas of the labour market affected by economic depression, uncertainty and unemployment. In particularly diverse regional areas, such as in the case of north-eastern Italy, where the working-class proletariat is particularly politically unbalanced towards right-wing (populist) movements such as the League,²⁵⁴ trade unions find themselves in a potentially conflictual situation between its inclusive core (according to principles of equality, international

²⁵² For fiscal and administrative services (Della Puppa 2018).

²⁵³ In addition, employers tend to prefer foreign workers who are more likely to be employed in sectors in the second tier of the labour market (Piore 1979), as they are less demanding, more productive, more flexible, and more easily disposable than native workers (Menz 2009).

²⁵⁴ The League is an Italian alternative right populist political party. Among its main political objectives are the defence of national sovereignty against the European Union (EU) and the inequalities caused by immigration and multiculturalism. The values on which the League bases its political discourse fall under security and conformity, framed in an authoritarian-populist rhetoric (Norris, Inglehart 2019; Miglietta, Loera 2021: 1).

solidarity and anti-racism) and its implicit protectionism towards its native members. After all, in a (persistent) historical moment of unionisation crisis, it is fundamental for unions to reach out to foreign workers (including second and third generations, in some cases also undocumented workers), in order to numerically compensate the deficits of recent decades (Menz 2009). Eventually, many of these choices may vary based on the national political-economic environment, competitive strategies, and the type of firm production (Hall, Soskice 2001a).

Comparing Italy and Japan, the former has undoubtedly embarked on a form of migration model similar to LMEs, albeit in alternating phases. In addition to the constant search for high-skilled workers for the higher segments of the labour market, Italy has sought and placed low-skilled migrant workers in all main sectors of the labour market (Menz 2009). Japan, in typical CME fashion, has placed greater emphasis on actively seeking high-skilled foreign workers, only recently (2018) yielding to the needs of capital (especially SMEs) towards medium- and low-skilled foreign labour in predetermined labour market sectors (Hamaguchi 2019a). This would suggest the beginning of a transformative movement even in a country as historically static in migration policies as Japan, where not only high-skilled foreign workers are no longer sufficient, but also non-Japanese labour seems to be needed to counter neoliberal economic pressure.

The next section deals with the comparative analysis on the theme of the relationship between trade unions and migrant workers, their preferences and strategies.

3.2. Trade union "dilemmas": inclusion and representation of foreign workers

The topic of relations between trade unions and migrant workers has been extensively dealt with in the past, in particular in Penninx and Roosblad's (2000) book "Trade Unions, Immigration, and Immigrants in Europe, 1960-1993".²⁵⁵ It laid the groundwork for this topic, becoming a classic point of reference. However, the transformations that have occurred over recent decades have led to the need for its theoretical restructuring (Marino *et al.* 2015: 2).

Penninx and Roosblad's book originally included three "dilemmas" and four sets of explanatory factors in its analytical framework. The dilemmas were about decisions to be made by unions with respect to employer choices, i.e., whether to resist or cooperate with them in recruitment mechanisms; the second dilemma was about union inclusion or exclusion policies towards migrant workers, i.e., whether to provide them with active participation or exclude them

²⁵⁵ For further discussion on this topic, see Castles and Kosack (1973), Vranken (1990), Penninx and Roosblad (2000).

from union participation to avoid potential class conflict with native workers; the third dilemma, equal versus special treatment, was about whether native workers and foreign workers should be considered and treated equally, or whether the latter should take a different path to protect their interests. The first dilemma could lead to a decline in union bargaining power in the case of cooperation, but also a slowdown in economic growth in the case of resistance. The second dilemma also risked a general loss of bargaining power on the part of unions in the case of exclusion of migrant workers, but in the case of inclusion the risk was to create contrasts with the native workforce and a race to the bottom in overall labour conditions. Finally, the third dilemma contrasted the risk of social injustice to the foreign labour force in the case of adopting non-differentiating strategies, but also the potential risk of their alienation in the case of adopting differentiating strategies (Marino *et al.* 2015: 2-3).

The four sets of explanatory factors for determining union choices are: the overall strength of unions, both in decision-making and within society; economic and labour market conditions of the time; social trends; the (perceived) characteristics of migrant workers. The first set of factors is crucial to the interaction between labour, capital and the state (Penninx, Roosblad 2000: 13-14). The greater the union strength, the better the results in concerted actions. The second set of factors is determined by the economic situation. In times of labour shortages, unions will be more favourable to the liberalisation of migration policies, while in times of large presence of native (unemployed) labour they will oppose such policies. The third set of factors implies that unions are not actors disconnected from the social framework, and they are fully influenced by it. From legislation to the position of political and social actors, the socio-political context contributes to determining union strategies. The fourth set of factors relates to the different characteristics of migrant workers, from the country of origin to the (often assumed) ethnic characteristics functional to the labour market (Marino *et al.* 2015: 3). This can also be determined by cases of ethnic contiguity and consequent preference for the social and productive fabric of the country, as was the case for the *nikkeijin* in Japan. An additional set of factors must also be considered, which relates to the political nature of each union and its internal dynamics. Each confederation, federation or autonomous union possesses its own identity and degree of internal cohesion. A political left-wing oriented confederation such as the CGIL, which defines itself as a "general" union that promotes not only workers' rights (in full, not just members' rights) but a wider range of social-political issues, will have a stance closer to the problems of migrant workers (Marino 2012). A union such as UA Zensen that is politically oriented to the right, despite a necessary all-inclusive stance because of its sectoral focus (services), will have a less accommodating stance towards foreign workers.

Penninx and Roosblad's analysis could be summarised in the "simple" observation that the strategies and actions of trade unions with respect to migrant workers were mainly determined by the specific national context, like the type of legislation, the position of institutional actors, the weight of public opinion on the issues, etc. (Penninx, Roosblad 2000: 206; Marino *et al.* 2015: 4). Marino, Penninx, and Roosblad (2015) identify a number of structural transformations to the above-described characteristics that have occurred over the past two decades. Specifically, the transformations can be identified in migration patterns, policies, labour markets, and industrial relations. For example, migration phenomena have had changes in size and patterns, departure and arrival countries, while entry and participation regulations have changed. The phenomenon of feminisation of migratory flows is particularly relevant, as it has led to a shift of interest on the part of trade unions towards sectors of the labour market with a prevalence of foreign female labour and hitherto not particularly involved in the traditional union sphere of interest (care, nursing, domestic service, etc.). Labour markets, too, have undergone radical changes, especially due to economic and financial globalisation, neoliberal pressure and the increasing influence of supranational developments (such as the financial crisis of 2008). They have not only affected national economies and regulatory frameworks, but also the trade union internal structures, which have been severely touched by these transformations and have limited possibilities to counteract them (Marino *et al.* 2015: 4-7).

The importance of the different employment sectors has changed, with a major shift of workers from the historic sectors of union representation (manufacturing) to services. Unions have historically been the primary source of representation and protection for core, native workers, and less likely to care about non-regular workers. As change has occurred in recent years in all advanced economy societies, unions have also had to adapt to the new economic environment and, with varying attempts and results, have initiated internal expansion policies to cover these sectors and precarious workers. Ultimately, unionisation rates have generally declined, leaving unions in the "dilemma" of either expanding their grassroots membership elsewhere or acting in an environment where their bargaining strength is weakened (Marino *et al.* 2015: 4-7). The strength of unions is based on factors such as the rate of unionisation, their level of organisation, their access to government channels and their level of relations with political parties, and their level of centralisation and internal unity (Marino *et al.* 2015: 10-11). An overall weakness in these factors, including the degree of institutional embeddedness, leads unions to seek alternative avenues of strength, thereby involving and organising marginalised groups such as migrant workers. In fact, the lower the degree of institutional embeddedness and of institutional power resources, the greater the

need to seek bargaining strength from migrant workers and a more favourable application of inclusive attitudes towards them (Baccaro *et al.* 2003).

The new question posed by Marino, Penninx, and Roosblad as regards the contemporary role of unions is whether they, as political and social actors, should seek to influence migration policies and migrant workers' access to labour markets by opposing or supporting government policies on immigration and integration (Marino *et al.* 2015: 8). In the Italian case, the stance is that of a general search for international solidarity and equality among all workers, so as to improve working conditions and wages for all labour (Watts 2002). In the Japanese case, however, the stance is one of partial inclusion, at least rhetorically, due to a substantial fear of a general worsening in the working conditions and wages of Japanese workers (interview with Rengō 2020). If in the Italian case the inclusion of migrant workers, at the expense of potential conflicts with the native rank and file, has become a matter of quantitative importance and an explicit approach to international solidarity values, in the Japanese case organising foreign workers does not turn out to be a priority. The numbers are too small to have the political clout like in other OECD countries, and consequently the interest is lower. In Italy, as in Japan, organising non-regular workers seems to be the new priority over organising migrant workers. However, in Japan this feeling is stronger, partly due to cultural variables. Not least a sort of "late-comer" effect linked to principles of inclusivity and exclusivity (*uchi* vs. *soto* and "Japaneseness"), but also to more imperceptible residual post-colonialist socio-cultural practices.²⁵⁶

The next section begins with the empirical part of the thesis focussing on the interviews conducted with Italian and Japanese industrial relations actors and their subsequent analysis.

3.3. Interview premise

As outlined in the introductory chapter, this research work makes use of both primary and secondary data. The first two chapters are based almost entirely on secondary sources, from the great classics of the literature of economic and political sociology to the growing literature of the last thirty years on migration policies (particularly Japanese, written by both Japanese and non-Japanese authors) (Liu-Farrer 2020: 218). Books, scholarly articles, and other doctoral dissertations are present, too. The main purpose of the secondary data was to create sufficient context for analysis in order to understand ideas and nuances about potential Japanese transformative processes

²⁵⁶ Reference to these socio-cultural behavioural patterns can again be traced all the way back to the works of the imperial-era intellectual Fukuzawa Yūkichi, especially his "Bunmei-ron no Gairyaku" (Russell 2009; Arudou 2015).

through the analysis of a wide range of different existing bodies of research. This chapter, on the other hand, relies chiefly on primary sources. The interviews are the backbone of the primary data, but other sources such as national and international public statistical data, statements on the official websites of the interviewed actors, and newspaper articles are also present to enrich the content of the text.²⁵⁷

During this three-year-long research (2018-2021), I collected a series of in-depth qualitative interviews. Indeed, the fieldwork was performed from Autumn 2020 to the end of 2021. The recruitment of respondents was based on different strategies. In Italy, I used a snowball technique that started from personal knowledge at the local and provincial level, up to the national level (from the provincial offices of Vicenza to the regional offices of Veneto, and so on). In Japan, it was possible to conduct the fieldwork until March 2020, at a pre-pandemic period when travelling and residing in the country was still manageable. Through sponsorship by the Japan Foundation, I was able to stay in Japan and move freely in order to schedule appointments. By means of a progressive, snowball-like method, I also had access to unions in Japan that would otherwise be difficult to reach. This was due to the help of acquaintance with university professors in Kyōto, Ōsaka and Tōkyō. A total of eleven semi-structured interviews, of between one and two hours, were conducted with Italian and Japanese leading experts and institutional representatives from trade unions, employer associations and migrant associations. Additional background interviews with academic experts provided additional insights. The choice of elite interviewing was dictated by maintaining a macro approach to the research question. Interviews took an average of two hours, were entirely handwritten, and were not recorded. The decision not to record the interviews was dictated by the need to keep their form constant, as during the first interviews in Japan I did not have the opportunity to use any recording equipment. For the interviews in Italy the language was solely Italian,²⁵⁸ while for the interviews in Japan the language was a mixture of English and Japanese.

The scope of the questions was to better understand how the institutions of national industrial relations behave in a rapidly changing context determined by internal factors and, above all, the effect of external phenomena/shocks such as economic crisis and globalisation. Having access to privileged actors, who are (partly) the protagonists of these dynamics, can potentially be a gateway to further interpretations of the literature and a preferential channel to understanding not only the facts here studied but also future predictions of change. Among these institutions, both Italian and Japanese, the focus has been on the prominent domestic trade unions (not only confederations), and the most important national employers' associations. The interviews targeted

²⁵⁷ Questions and additional basic data on the interviewees are included in the appendix.

²⁵⁸ When direct quotes from interviewees are given, English translations are by the author.

speakers at different structural levels, i.e., national, regional, provincial, and local, thus creating greater nuance in perceptions of the mechanisms under analysis. In the Italian case, it is essential to understand that the different levels of representation, vertical (national vs. local) and horizontal (representation in different areas of the country), are bearers of different values, demands and needs, sometimes even conflicting with each other. In these interviews, the horizontal variant has not been taken into consideration.

The initial design of the fieldwork consisted of a series of fifteen to twenty qualitative questions to be proposed to each selected subject. The outline was not rigid, and the interlocutor was given complete freedom to decide what to answer and how much time to spend answering each question. However, due to the global pandemic, the questions were significantly modified, along with the areas of analysis and the ultimate purpose of the interviews. Unfortunately, a number of complications arose, limiting the purpose and effectiveness of using this form of interview, primarily due to difficulties in intercepting the interviewees and the disruption of obtaining responses from them. To remedy these complications, the number of questions was lessened and the research object was redefined, focussing on how industrial relations in Italy and Japan can influence migration policies as a function of the labour market by evaluating extremely similar structural dynamics in partially different contexts. Given the small number of interviews, my data were not aimed at lending accuracy to inferential statistical analysis, and this research project was not aimed at that purpose.

In terms of the positions of the different key actors, all follow what is outlined based on their historical structure. The positions of labour and employers' representation follow typical institutional archetypes, whether it be inter-relational issues in industrial relations topics, in the management of the most recent problems related, for example, to the Covid-19 pandemic, or in the issue related to the presence of foreign workers in the domestic labour markets (and future prospects on this topic). Their positions are consistent with the history of these institutions over the last seventy years, with classic labour/capital contrast, but also with several commonalities pertinent to the protection of specific areas of the labour market and sector interests. Moreover, the national specificities of Italian and Japanese industrial relations, though never truly static and somewhat fluid to varying degrees according to historical and economic stages, are constantly reproduced. Often the positions taken by workers' and employers' representatives follow the specificities that have marked the institutional advantages in the more classic systems of capitalism to which Italy and Japan belong.

In different stances are, for example, the small, sectoral trade unions. Despite the fact that they, too, are within a system of industrial relations and bargaining mechanisms typical of the domestic political-economic reality to which they belong, each with peculiar limits and different lobbying possibilities, they often correspond to positions on the opposite side of the main national (con)federation's structure. Potentially, they are at odds with the predefined dynamics in the "power games" of political-economic bargaining, centralised or not. However, in their particular stance, with respect to the position of the larger institutional representations, they too fall within what "would be expected" from their institutional history and political position in the historical, economic and cultural context in which they are present.

In this thesis's set of interviews, there are also testimonies from individual actors who, though representatives of the specific institution (in this case a union), are an interesting voice outside the predefined organisation channel. In this case, specific nuances on the topic can be evinced, although limited by personal ideas of the subject interviewed and "unofficial" with respect to the official position of the specific trade union. Notwithstanding this, it depicts an internal mechanism present at a lower level than the national dynamics.

3.4. Interviews

3.4.1. Japan

During my stay in Japan (October 2019-March 2020), I conducted a series of interviews in Tōkyō, with some of the most important political-economic institutions in the Japanese labour market. The first set of interviews was done in February 2020, at the offices of the different institutions. Interviews in Japan were held with: Mr. Tanaka Tsuneyuki, deputy director of the Office of Labour Legislation of Keidanren (日本経済団体連合会, *Nippon Keizai-dantai Rengōkai*) or Japan Business Federation, a comprehensive economic organisation with a membership comprised of 1.412 representative companies of Japan, 109 nationwide industrial associations and 47 regional economic organisations (07/02/2020); Mr. Katayama Takahito, director of the International Policy Division of the International Policy Department of Rengō (日本労働組合総連合会, *Nihon Rōdōkumiai Sōrengōkai*) or Japanese Trade Union Confederation, the largest national trade union

centre in Japan with a membership of 7 million workers (10/02/2020); Ms. Miyajima Yoshiko, assistant director of the Policy Support Center, Ms. Namai Motoko, assistant director of the International Affairs Office, Mr. Takanori Namigishi, assistant secretary of the Trade Division, and Mr. Yoshiki Katsura, member of the Trade Union Committee of the Commercial Division of UA Zensen (全国繊維化学食品流通サービス一般労働組合同盟, *Zenkoku Sen'i Kagaku Shokuhin Ryūtsyū Sābisu Ippan Rōdō Kumiai Dōmē*) or Japanese Federation of Textile, Chemical, Food, Commercial, Service and General Workers' Unions, the largest industrial union in Japan which represents 1.79 million members from 2.333 affiliates (13/02/2020). UA Zensen represents various industries, such as textile, garment, pharmaceutical, cosmetic, chemical, energy, ceramic, building material, food, commerce, printing, leisure, service, restaurant, welfare, medical, as well as temporary agency and contract work. Politically it can be placed on the right.

Keidanren and Rengō are the two main entities that are part of the Japanese tripartite system of industrial relations along with the government and, consequently, the political-economic institutions most representative of the dynamics of the Japanese labour market (along with, in addition, other economic institutions such as the Chamber of Commerce for Small and Medium Enterprises, etc.). UA Zensen's choice was determined by the fact that I wanted to hear from those representing the sectors most sensitive to contemporary labour market dynamics and transformations, i.e., service sectors, so that it could be possible to hear the opinion of those closest to non-regular (potentially non-Japanese) workers.

The interviews were structured initially with a series of twelve questions, different for each institution, concerning first of all the role of the specific institution in today's Japanese economy (or reference sectors as in the case of UA Zensen), a question about their opinion on the process of liberalisation and deregulation of the Japanese labour market, a question about the rate of unionisation/involvement of their members in the union's activities, a question about the development and future of the Japanese labour market in light of the structural changes underway (low birth rate, ageing population, reduction of the working age population), a question on the role of technology in their specific sectors, a question on the system of temporary employment agencies and their overall role in the ongoing transformations in the Japanese labour market, a question on their opinion on the new immigration law that came into force last year and their active role in shaping the law, a question about their opinion on the role of migrant workers and the consequences of their presence (and increase) in the Japanese labour market, a question about their role in the Japanese tripartite system, and finally, a closing question on their relationship with the current (and

previous) government. The questions varied depending on the interviewer, with changes in structure and content, but the common thread of the different interviews was the one just described.

The research attempt at this point has been to infer from these questions any chance of transformative potential from the current policies, especially in the area of migration policies and Japan's political-economic convergence to mixed market economy systems. Or, at least, to a progressive abandonment of Japanese typicality in migration policies and in the consequent management of the labour market.

In a second set of interviews (March 2020), also conducted in Tōkyō, it was opted to go deeper into dynamics more related to migrant workers. In fact, I conducted an interview with Mr. Hikawa Masaichi, an attorney at law who practices in Kawagoe city in Saitama of Nichibenren (日本弁護士会, *Nihon Bengoshi-kai*), or Japan Federation of Bar Associations. Founded in 1949, it is Japan's leading federation of bar associations. Its stated objective is about the "*protection of fundamental human rights and of realization of social justice (Article 2, Articles of Association of JFBA) to maintain the roll of attorneys (Article 8, Attorney Act), and in view of the purpose and duties of attorneys, to govern matters relating to the guidance, liaison and supervision of all attorneys and bar associations in order to maintain their dignity and improve and advance the work of attorneys (Paragraph 2, Article 45, Attorney Act)*" (Japan Federation of Bar Associations 2021). Mr. Hikawa is an expert on issues related to migrant workers. This interview, unlike the first ones, was done in a location outside the institution's headquarters; it took place precisely in Urawa, Saitama Prefecture (14/03/2020).

Once back in Italy, another series of interviews (three in total) took place with Ms. Okunuki Hifumi, executive president, and Mr. Carlet Louis, chief finance officer of Tōzen Union (全国一般東京ゼネラルユニオン, *Zenkoku Ippan Tōkyō General Union*) (10/02/2021). It is the first amalgamated union (*gōdō rōsō*) in Japan to be led by foreigners. Although Tōzen is not tied to a specific sector or industry, its members are mainly from the publishing, banking, university and foreign language teaching industries. Many members are foreign workers and it can be considered a multinational union. Interviews were conducted via online platforms. Politically it can be placed on the left. UA Zensen and Tōzen are both members of Rengō.

The last interview was with Mr. Fuse Keisuke, deputy secretary general of Zenrōren (全国労働組合総連合, *Zenkoku Rōdōkumiai Sōrengō*), or National Confederation of Trade Unions, the second-largest union confederation in Japan (04/11/2021). Founded on 21st November 1989, in response to the establishment of Rengō, Zenrōren can be described as a distinctly more left-wing, militant, and progressive confederation. Although not officially affiliated with any political party, Zenrōren has historically been linked to the Japan Communist Party (JCP, 日本共産党, or *Nihon Kyōsan-tō*) (Watanabe 2014: 20). It currently represents about 1.2 million workers and is composed of twenty-one industry federations and forty-seven prefectural federations (out of forty-seven prefectures in Japan) (Zenrōren 2021). Its basic goals, as presented in the "common policy agenda" of the leftist coalition formed for the House of Representatives elections in November 2021, are the achievement of international labour standards, the establishment of a nationwide minimum wage system,²⁵⁹ opposition to military expansion and militaristic reform of the Constitution,²⁶⁰ gender equality, elimination of all forms of discrimination, abolition of the U.S.-Japan Security Treaty, etc. (Kurosawa 2021b). Although Zenrōren is the second-largest union confederation in Japan, it is excluded from tripartite bargaining and lacks (sufficient) access to various forms of government policy-making, a role attributed solely to Rengō (Watanabe 2014: 20).

With these two institutions, the research objective was to understand from within the mechanisms closest to migrant workers, potentially gaining feedback from non-economic institutions and a personal perspective on transformative factors inside Japanese society, government migration policies, and its labour markets, while exploring the possibilities of systemic convergence to other political-economic realities.

The next section will summarise the February 2020 experience in Tōkyō and interviews with the Japanese capital and labour front. Part 2 will summarise interviews with Nichibenren, Tōzen Union and Zenrōren. Although the topics are broader than the focus of this thesis, their discussion can help contextualise the orientation and positions of these actors in the Japanese political-economic framework.

²⁵⁹ Currently in Japan there is a minimum wage system that varies by prefecture. However, there are considerable differences between the various prefectures: Tōkyō has the highest minimum wage (1.041 yen), while the lowest are set at 820 yen. Zenrōren proposes raising the minimum wage to 1.500 yen in all prefectures (Kurosawa 2021a).

²⁶⁰ The LDP government has been trying to overhaul Japan's "pacifist" Constitution for many years, with the goal of spending 2% of domestic GDP on military spending, until now stabilised at around 1% of total GDP (Reuters 2021).

3.4.2. Interview description and preliminary considerations

3.4.2.1. Keidanren

The first interview in Japan was with Keidanren. From what it was possible to gather from the interview, Keidanren represents the archetype of a strong, solidly structured employers' association that can fully represent Japanese business. Keidanren's current chairman, Tokura Masakazu, is the president of Sumitomo Chemical.²⁶¹ In addition, Keidanren contributes to many key government advisory boards, representing the Japanese business and capital interests. As expected, Keidanren is strongly in favour of deregulation and liberalisation of the Japanese labour market, having actively participated in policy-making directed to this end (such as, for example, the expansion of employment sectors for TAS). It is eager to develop central economic strategies to contrast the strong pressure created by neighbouring countries through enhancing the competitiveness of the Japanese industrial sectors. With regards to Keidanren's ability to reach out to new entrepreneurs, despite a slight improvement in recent times, it has been stated that they have considerable difficulties in approaching new types of business, still relegating their association's core to employers in manufacturing.

Keidanren is strongly oriented towards expanding women's and older workers' employment (even retired people) to solve Japan's demographic and economic structural problems while promoting digital transformations (for instance by actively promoting digitisation processes, education and training among its members). This is one of their plans to increase stagnant Japanese production, as well as broaden the scope of TAS to create a greater degree of competitiveness and flexibility, thus filling skill gaps and labour shortages within Japanese firms.

On the migration policies issue, despite being a leading player in lobbying the government to open its doors to a low-cost, low-skilled foreign labour force, Keidanren ideologically follows the government's political orientation by preferring the entry of high-skilled migrant workers and limiting the arrival of manual labour. Accordingly, Keidanren is opposed to the Japanese Chamber of Commerce's stance which, on the other hand, is favourable to wider access of foreign workers in the labour market in order to cope with the demands of small and medium firms. In fact, SMEs are the first subjects that need to reduce production costs to be able to remain competitive in the

²⁶¹ At the time of the interview, Keidanren's executive chairman was Nakanishi Hiroaki (May 2018-June 2021), Hitachi's chairman and CEO (until his death in June 2021). During the interview, it was emphasized that his persona represented a trait of strength and authority for Keidanren.

economic market. However, Keidanren remains doubtful about a possible negative consequence of an increased presence of migrant workers in the Japanese labour market, as they are convinced of the (urgent) need to fill the gaps in the domestic (dualised) sectors, especially those not wanted by Japanese labour (3K sectors). It was interesting that Keidanren responded that its own relationship with the government is optimal, while it had stark political contrasts with the 2009-2012 DPJ majority government (the only recent non-LDP majority government), unlike Rengō. Keidanren also currently rates its own relationship with Rengō as very positive, finding no major political or ideological divergences in tripartite relations.

3.4.2.2. Rengō

In the second interview, Rengō was vaguer in the overall "quality" of answers, but very firm on certain concepts. First of all, Rengō shows that they want to protect mainly (and probably only) their own core workers, who represent the standard model of "Japanese traditional labour", i.e. a male regular worker generally employed in large manufacturing companies, with a contract that binds him to the firm for life and based on the Japanese seniority pay system. Rengō does not deny its awareness of being in trouble in reaching those who are not part of this specific pool of labour, i.e. women, non-regular, part-time and migrant workers, who usually are employed by small and medium-sized enterprises. Although there has been a partial increase in the unionisation rate of non-regular workers, Rengō's goal is to increase the organisation's membership number of non-regular and part-time workers in order to deal more efficiently with the government. On the topic of employment inequalities created by Japan's highly dualised labour system, where the divide between first-tier core workers and non-regular workers employed in the lower end of the labour market is continuously increasing, according to Rengō the solution is the new April 2020 law on equal pay. This law is aimed at equalising part-time workers' contracts with those of full-time core workers.

Rengō is also adamantly opposed to the entry of new foreign workers into Japan, explaining this idea with the difficulties in labour market integration which are due to language barriers. This linguistic (and cultural) hurdle is considered a sufficient justification for their stark opposition to (not high-skilled) migration, as it can create social risks that are too difficult to manage. Rengō, like Keidanren, also suggests the employment practice, already initiated by previous governments and boosted during the Abe administration, of increasing the entry of women and retired workers into

the labour market, while raising the retirement age from 65 to 67. In addition, regarding the structural demographic problems of Japanese society and the consequent need for new labour in the care sector, unlike the Italian case, they strongly suggest an increase in care sector workers' real wages to incentivise the presence of new domestic labour, as well as redirecting part of taxes (e.g. the consumption tax that in October 2019 increased by 8%) to the care economy. At the same time, they are in favour of increasing the use of technology in target industries, thus being able to increase productivity and solve the Japanese labour shortage problems.

Finally, on the question of Rengō's role in the tripartite system, they complained about their current lack of political power compared to the other parties, stating that even in 2009, despite the potentially greater political affinity with DPJ, they were unable to achieve appreciable results. Overall, however, they consider the current social protection and wages of Japanese core workers to be sufficient. The problem with today's labour market is solely on the part of non-regular workers. On the Japanese GIG economy, their perspective on the current situation is extremely difficult because, similar to many cases in other countries, regulation is still immature (if not non-existent). Given the low productivity of the sector and the relative (low) value of the labour employed in GIG jobs, they do not find this type of worker interesting, yet.

3.4.2.3. UA Zensen

The third interview was with UA Zensen. UA Zensen is Japan's largest federation covering the service sector (in addition to other ones) and is directly associated with Rengō. As a result of being just a federation, it is not directly involved in Japan's tripartite system of industrial relations. However, even within Rengō, it plays an important role due to its large membership in sectors that are difficult to represent. It is a federation that is politically oriented to the right, and thus very close to the economic and labour market policy ideas of the Japanese LDP government. First of all, UA Zensen is concerned about its target workers, non-regular, part-time and dispatched workers. In fact, their first concern in this regard is the adjustment of non-regular labour salaries and contracts to full-time workers' ones (in their opinion the April amendment of the labour law should partially solve the disparity gap problem). At the same time, they have a cautious approach, as they are aware that around 60% of those working in these sectors are housewives who prefer to maintain a flexible working style for domestic work requirements. As is often the case in Italy, working part-

time is not always an option. The remaining 40%, according to UA Zensen, actively wants to increase their salary, thus being against the government's deregulation policies.

In terms of Japanese economic structural issues, UA Zensen thinks that the biggest problem is low wages. In the care sector, small and medium-sized suburban and rural cities face the greatest difficulties and have begun to create centralised services and community centres to share the burden and the cost of services. The employment of foreign workers, especially from neighbouring Asian countries, has proven to be a failure, especially because of Japan's lack of attractiveness in terms of salaries and growth rates (thus limiting a real increase in salaries over time). In addition, another difficulty was represented by the Japanese precondition of long working hours. UA Zensen's position on TAS policies is identical to that of Rengō, as they are both favourable only to the protection of their membership and they have little interest in the possible socio-economic consequences of any further liberalisation.

According to UA Zensen, the role of trade unions in Japan is actually changing. They are moving from a predominance of the enterprise union system to non-traditional labour dynamics, giving more importance to SMEs and part-time workers. UA Zensen considers itself the only federation in Japan capable of managing and organising part-time workers. At the same time, the total membership represents 10% of the whole domestic industry.²⁶² On the question of unionisation rate, since UA Zensen focusses on part of the workforce that has historically been difficult to reach, especially part-time workers (not only from SMEs but also from large companies), they realise that there is still a long way to go (they currently represent 8.6% of unionised workers in Japan, out of a total of 16.9%). Their current goal is to reach four million members. The same problem is found for the GIG economy, as it is managed by its own office dedicated to part-time workers. The biggest problem is that they find it difficult to reach this kind of labour, whereas most GIG economy workers refer directly to Rengō for all types of problems.

With regard to migrant workers, UA Zensen considers their presence numerically insignificant, concentrated more in the trade and food processing sectors. When asked about the 2018 migration law, UA Zensen's approach was very negative, similar to Rengō's position. In fact, UA Zensen's main purpose is the protection of their members, typically Japanese, non-regular workers. They also added that the presence of foreign labour should be even more limited and controlled under certain conditions.

In a subsequent interview with Prof. Honda Kazunari of Kokugakuin University (Tōkyō), who works closely with UA Zensen and studies both part-time and dispatched workers, the system

²⁶² I also had a chance to ask regarding the situation in the tourism sector, but the sector manager was absent that day.

of Japanese food chain stores and restaurants, and the role of Japanese trade unions in organising non-regular workers, he confirmed liberalisation trends of various labour categories, as well as the high presence of women and students in these sectors. His overall view on the situation of these areas of the Japanese labour market is partially negative and he does not see a real incidence of foreign workers, not even in the immediate future. In addition, according to him, the organisation of non-regular workers is still far from being considered relevant, as trade unions are still too oriented towards traditional structures of the Japanese labour market, while the domestic gender gap and labour dualisation are still excessively marked.

3.4.2.4. Nichibenren

The main topics covered during the interview with Nichibenren included issues related to migrant workers and the role of civil society and trade unions in protecting them. From the interview, it is possible to infer a partially negative situation with regard to the overall situation of foreign workers, relegated to issues already discussed in the literature. Discrimination and "social pyramiding" on a national basis were confirmed. Only civil society, and not the unions, seem to have a decisive role in this issue. On the topic of the future increase of migrant workers due to domestic labour shortage, Nichibenren remains in a sceptical position, due to the small scale of attractiveness that the current Japanese labour market seems to have for foreign labour.

3.4.2.5. Tōzen Union

The interviews with Tōzen Union (especially the second one in February 2021) came closest to the focus of this thesis. First, it was possible to infer a negative critique of the Japanese federal and confederal union system towards migrant workers. Migrant workers, and foreigners more generally, can never be totally part of Japanese society, socio-economically limited and discriminated in a national and phenotypic sub-distinction. In particular, the unitary vision of the Japanese trade union, especially in the macro representative area of Rengō, is challenged by more sectoral and less conventional realities such as Tōzen Union. Mainly, it is Rengō's non-antagonism against management that makes organisations like Tōzen Union more marginalised but at the same time more dangerous for mainstream labour representation. Even stronger is the criticism of UA Zensen,

which is considered anti-union. UA Zensen, being the largest federation within Rengō, inevitably skews its ideology to the right. According to Tōzen Union, Japan is afflicted by "double" gender discrimination. Having repeatedly received international criticism for being very low in the rankings on gender discrimination, the Abe government has tried to encourage female participation in the labour market, especially in Special Economic Zones (in jobs such as housekeeping). This has seen greater participation of female migrants in these specific areas of the labour market, but at the same time has created a further dualisation of the market with the presence of weaker and more marginalised groups.

On the topic of migrant workers and the transformation of Japanese migration policies, Tōzen Union showed, albeit with different meanings, the same scepticism already found in the other interviews. Despite the fact that some sectors of the labour market continue to function thanks to the foreign labour force, the lack of union support and the almost total absence of policymaking on the part of the labour actors (especially Rengō) on this subject do not bode well for improvements or significant changes. Fundamentally, there is a lack of "grand design", which includes the 2018 Migration Law Amendment. Other labour entities, such as Zenrōkyō and Zenrōren, demonstrate a more involved general stance on the issue, but they do not have the political strength of Rengō. Public opinion, including young people, has no interest in these dynamics.

Lastly, Tōzen Union, like Nichibenren, is also sceptical of a structural transformation, primarily because of the impossibility of the presence of a larger foreign labour force in Japan. The main reason for this idea is the loss of attractiveness of the Japanese labour market, which is now outclassed by more attractive markets for foreign labour such as Malaysia, Singapore, etc. According to Tōzen Union, Japan is still a very good country to live and work in, with good infrastructure, a good standard of living and security, but it will be necessary to counteract the strong populist movement present in Japanese politics and in its society, as well as the heavy barriers imposed by the language difficulties encountered upon arrival in the country. Convergence is possible and it is happening, even if at a very slow pace, but it is opposed on all fronts (political, social, cultural) for fear of a transformation into the "negative reality" of migrant workers in the USA and European societies.

3.4.2.6. Zenrōren

The last interview, which took place in November 2021, was with Zenrōren. Like Tōzen Union, the interview was more centred on the themes and research questions of this thesis. Firstly, Zenrōren specifies their differences from Rengō. While Zenrōren primarily represents SMEs, Rengō represents large multinational enterprises and the public sector. Although both have their strengths, Zenrōren distinguishes itself by being more militant and progressive, while Rengō is more cooperative with management. However, Zenrōren is almost totally excluded from the domestic tripartite system (except in cases such as the minimum wage council at the central government level), whose only labour representative is Rengō. Basically, Zenrōren calls for more real proportional representation from the LDP government, to "reflect the voice of the workers". On international issues, for example, Zenrōren is opposed to the Trans-Pacific Partnership Agreement (TPP), while Rengō is in favour, demonstrating a sort of antagonistic bias to labour and more closeness to capital. The transformations of Japanese society have forced a shift in the interests of federal unions. With manufacturing workers in decline and their rise in the service sector, Zenrōren and Rengō both seek to organise labour in these sectors (service, medical, child care, etc.), while Zenrōren competes with the most representative service union, UA Zensen. While Zenrōren is stronger in the medical sector, UA Zensen is stronger in the representation of supermarket workers. The problem with these sectors is that they are poorly organised and characterised by low wages. In an ageing society that needs more care workers, it is essential to organise this type of labour.

On the topic of Japanese migration policies and migrant workers, Zenrōren specifies that it is not only the care sector and those belonging to the 3Ks in manufacturing and services that are in great difficulty because of the ageing society, but also agriculture. The need to open up to foreign labour is clear, but the Japanese labour market has traditionally been extremely conservative. Throughout Japan's contemporary history, a number of problems related to foreign workers have occurred, such as in the case of *zainichi*, *nikkeijin*, and trainees. The latter, in particular, have been in a system very similar to slavery rather than real technical training. Zenrōren, therefore, is for the abolition of this scheme. The ICRRA 2018 amendment is merely an improvement to their plight, but it is not enough. The same can be said for refugees and asylum seekers in Japan. Emblematic is the case of closing the borders to foreign residents during Covid-19, a unique fact within OECD countries. Zenrōren is very active towards migrant workers, especially with community-based unions within its affiliates. Its position as a confederation is one of openness to migrant workers, while according to them, Rengō's position on the issue has depended entirely on its affiliates' position.

On the topic of socio-economic transformations and system convergence, Japanese society and the labour market are changing, especially in the economic pressure on the domestic welfare system. This is even more aggravated and accelerated by the Covid-19 pandemic. The number of doctors and medical personnel per person is among the lowest of OECD countries and is heavily affected by the neoliberal public policies imposed by the LDP government. Japan's future regarding opening (or closing) to migrant workers is experienced with a kind of tension in Zenrōren. The basic assumption is that policy and the labour market should open up to migrant labour, but this should be done with strong regulations. Using the example of South Korea, Zenrōren says that it is currently more attractive than Japan. First of all, they have abolished the trainee system. Then, despite the fact that Japanese Labour Law does not provide for any kind of discrimination between Japanese and non-Japanese workers, it often occurs and the latter are not protected (also due to the lack of union participation in this problem). Convergence, on the other hand, especially on future government migration policies, is neither perceived nor expected. According to Zenrōren, everything depends on business demand, but it is not sufficient for structural change. Although Zenrōren is in favour of greater openness for the domestic labour shortage, and therefore expecting a transformation of the Japanese economic system, the example of the Economic Partnership Agreement (EPA) accords²⁶³ to import care workers has been a failure. In this case, too, the language barrier was decisive, signifying the need for a more controlled migration pattern. This scheme should also be applied to agriculture, which suffers from the same problems. Ultimately, Zenrōren's opinion is that Japanese society and the labour market are not changing, as highlighted by the results of the 2021 elections of the House of Representatives. However, Zenrōren is positive in the hope that the younger generation can be more active and that perhaps a little later than in other countries, it is possible to structurally change Japan.

The interviews conducted with Italian employer representatives and trade unions, while interesting, are not likely to answer the research question of this thesis. On the contrary, their purpose is to contextualise in a more definite way not only the variable of comparison with Japan, namely Italy, but also to give a more complete and structured idea of the systemic transformations that are taking place in the complex global political-economic systems. Japan and Italy are similar in many respects but very different in others. Comparing each factor of similarity and

²⁶³ These are bilateral agreements (Free Trade Agreement (FTA)/Economic Partnership Agreement (EPA)) with Indonesia (2008), the Philippines (2009), and Vietnam (2009) to allow specialised nurses, caretakers, and masseuses to enter and work in Japan (Shipper 2008: 27). This labour scheme was characterised, among many other problems, by the huge difficulty of its language proficiency requirements and language examination (Villog *et al.* 2020).

differentiation is not the aim of this analysis. However, they have served to create a broader and more precise general picture of an extremely complex context.

In this section, the interviews with Italian institutional economic actors will be presented and a general description and preliminary considerations will be made about what has been analysed from them.

3.4.3. Italy

Interviews were conducted differently in Italy, both in purpose and content. The institutions chosen were different, equal and diverse structural levels and sectors, sometimes this was due to difficulties in reaching the national levels to get answers to the macro questions I asked them. After an initial series of meetings at the local level in the province of Vicenza, some interviews have moved up to regional and national levels.

At the local level (Vicenza), representatives of various institutions were interviewed: Mr. Camporese Riccardo, secretary of USR (Unioni Sindacali Regionali), CISL Veneto and previously secretary of FISTEL CISL Vicenza (the federation of CISL representing workers in graphics, paper, papermaking, telecommunications, publishing, information and entertainment), with delegation, among others, to the policies of immigration, integration and citizenship (08/02/2021); Mr. Bianchi Enrico, secretary and coordinator of UIL Vicenza (07/09/2021); for employer representation, Mr. Crisci Andrea, head of the work, welfare and education area of Confindustria Vicenza (30/04/2021). At the regional level (Veneto), Ms. Fanelli Silvana, a confederal secretariat member of the CGIL of Venice, with delegation, among many others, to immigration policies (01/06/2021). Subsequently, still at the local level (Vicenza), Mr. Maffi Emanuel was interviewed, a trade unionist of CGIL Vicenza who has been working for many years for the rights of migrant workers (07/07/2021). Lastly, I had a brief telephone conversation with Mr. Cuccello Andrea, national Confederal Secretary of CISL with numerous remits (including Immigration Policies) (27/10/2021),²⁶⁴ and a final interview, close to the conclusion of the dissertation, with Mr. Galossi Emanuele, head of Coordination Migration and International Mobility Area INCA National, CGIL (17/01/2022).

3.4.4. Interview description and preliminary considerations

²⁶⁴ Afterwards (11/22/2021), I received written responses to four questions previously sent to him on the topic of CISL and migration.

3.4.4.1. CISL

The first interview took place at the CISL of Vicenza, within the federation of FISTEL, which associates the workers of information (paper, press, publishing, television) entertainment (cinema, audio-visual, music, theatre) and telecommunications.

Following a brief introduction on the decisive role of SMEs in Italy and how the representation of CISL is numerically divided (in descending order: private tertiary sector, public employment and school, metalworkers, food, chemical, textile and finally pensioners), we moved on to the theme of migrant workers. Specifically, within the region of Veneto the presence of migrant workers is low, around 10-12%, with higher peaks in specific sectors (high in tanning, construction 30%, metalworkers 10%, lower in commerce; in private care, i.e. "*badanti*",²⁶⁵ there are almost 100% female foreign workers). CISL strategy towards foreign workers was to raise the number of foreign union workers, wondering if the organisation was in this way inclusive. However, despite the absence of barriers to entry, the results are not clear. There is difficulty in moving beyond their role as mere delegates, whether they are Eastern European or African. Even worse is the situation involving other nationalities, such as Indians and Bengalis. Present above all in the tanning sector and agriculture, they are simply members but do not participate in union life. In southern Italy, more foreign workers are union members than in the rest of the country.

Inclusion is not considered an obstacle, but, for example, within CISL there are few foreign workers. This is evident from the lack of migrant workers at the secretariat level, thus denoting a problem of organisational "permeability". This is particularly true at the national level. The paradox between trade unions and migrant workers, especially in regions politically dominated by the League such as Veneto, is very much felt. The members are often aligned with the voters, with a strong adherence of the electoral base to those represented in CISL since the 1990s. Although there are conflicts in the factory with heated discussions, CISL has not aligned itself, for example, with restrictive migration and control policies such as the Bossi-Fini law of 2002. CISL is partially "saved" from these dynamics thanks to national bargaining and by representing a broad social force,

²⁶⁵ A "*badante*" is defined as "*a person, without special qualifications, who looks after the elderly, sick or dependent persons*" (Treccani 2022a, author's own translation). This professional figure falls within the categories of the domestic employment relationship, i.e. the employment relationship that is carried out exclusively for the needs of the employer's family life. The term often has a negative meaning, reinforced by the stereotype of the migrant woman-*badante* combination.

being now less politicised. CISL stands against "*caporalato*"²⁶⁶ and seeks dignity for all, obtaining a positive general response from all workers.

CISL, like the other confederations, is in favour of entry quotas that regulate the number of foreign workers who can access the domestic labour market, finding labour shortage problems in some Italian economic sectors, too. The quota system is considered the "least bad" of all solutions. Like the other confederations, the migration issue is not carried out primarily between national institutes, but between civil society associations, planning with their actions and lobbying.

The second interview with CISL took place more recently, moving on from the local to the national level. The topic of the interview, in this case, was solely that of migration policies and migrant workers. After an initial telephone conversation, I received four written answers (out of a total of five questions).

The first topic addressed was, for the second time, CISL's inclusion policies. The response focussed more on the issue of the inclusion of migrant workers in Italian society. Solutions begin from work, regular and dignified, to the need for a reform of the law on citizenship for the promotion of integration and inclusion policies, to the need for widespread policies of emersion of irregular work relationships and regularisation. These issues, together with the depopulation problem of inland areas and the role that migrant families have in the social and productive development of many territories in economic and demographic difficulty, are related to the "*opportunities for growth and development, both individual and collective, for the territory and the population*". The issue of the Covid-19 pandemic and its effects on integration and inclusion processes was also addressed. It "*has created greater job insecurity and a general worsening of the living conditions of many immigrants (working mainly in the service sector, construction, domestic sector and personal care)*", in addition to the fact that "*the pandemic has given us a profoundly changed world of work with new criticalities and fragilities. New poverty, new unemployment, dispersion of professionalism, rethinking of one's life and work paths. All this requires real and robust active policies that support and sustain these processes of transformation with orientation services and accompaniment to work and continuing education*".

Concerning CISL's position within the national political discussion on the issue of migrant workers, CISL participates in all of them, in particular in those on the production sectors where the presence of migrant workers is greater (as well as prevention and contrast to undeclared work, the

²⁶⁶ The "*caporalato*" is defined as an "*illegal form of recruitment and organisation of labour, especially agricultural labour, through intermediaries (caporali) who hire, on behalf of the entrepreneur and in return for a bribe, daily workers, outside the normal placement channels and without respecting the contractual rates on minimum wages*" (Treccani 2022b, author's own translation).

phenomenon of *caporalato*, exploitation of migrants in agriculture, health and safety in the workplace, rights, protections and dignity of workers). On the position of CISL on the issue of entry, participation and protection of immigrant workers, the confederation stands "*for the promotion of legal channels of entry*" (for example, through "humanitarian corridors"), thanks to a "*programming of legal entries for reasons of work (seasonal and skilled work) through a comparison with all interested and involved parties (Institutions, business world and trade unions)*" and in conjunction with the need of "*a European policy on migratory flows, respectful of individual rights and shared between Member States (Dublin Treaty Reform), and the implementation of cooperation agreements on social security and social and health policies*".

Finally, addressing again the issue of potential problems that may arise between native and foreign labour, even at the national level it is reiterated that "*there is no conflict, but contiguity*", as in the Confederation there are no differences between the rights of Italians and migrants, but CISL is based on universal principles such as "*regular and decent work, for the respect of contracts, against exploitation and caporalato*".

3.4.4.2. Confindustria

The second interview was with local employer representation, namely Confindustria Vicenza. The relationship between the local and national components of the organisation was discussed. Given the relevance of manufacturing in Confindustria, optimising the relationships with stakeholders has been tried from the national to the local level on all the tables of discussion with the social parties that would like development and innovation. As regards relations with the government, Confindustria asks to be consulted as much as possible. If Confindustria is not consulted, especially on issues related to the manufacturing sector, or its requests are not perceived, a systemic crisis would occur that would impact the collective social welfare and create a socio-economic crisis. Confindustria criticises the amount and the difficulty of agreeing on the themes dealt with by the intermediate bodies, which create sluggishness of decision-making. The presence of Confindustria is primarily for the protection of its associates, and in the macro-economic aspects is present in government discussions. However, since it "*does not vote in Parliament*", it is unable to put the brakes on certain choices that are considered negative. During economic crises, Confindustria does not just show up when called upon by the government, but makes its own evaluations and presents its own projects.

According to Confindustria, we are now in a new industrial revolution, accelerated by exogenous variations such as the Covid-19 pandemic. The old productive structures need to react, including manufacturing. Digitisation and innovation determine needs that are not momentary, changing part of the labour system. This latest external shock implies an inability to return to previous production systems. What is needed is a new system of professional training, including transversal worker skills, new soft skills, and greater investment in continuing formation. Criticism is made against the Italian educational system that, although on the whole it is not considered bad especially in its initial (compulsory) stage, in the concluding one it is too disconnected from the needs of the labour market or from the formation of skills for unforeseen situations. To overcome this problem, it is necessary to invest heavily in training, copying examples such as the German dual apprenticeship, which is still not very widespread within the Italian context. Firms complain about a lack of worker skills, but they should be creating more skills training designs themselves. This would allow workers to create identity mechanisms with the company, as well as real economic gains. Corporate welfare services and the possibility of the idea of being able to enable personal growth are also important. Firms need to become areas of "academic" development. It is also important to homologate the entire country to the same productive standards. The country runs at two speeds. This is a strategic issue, and it is a responsibility of the central government. To solve this problem, it is necessary to remove regional control where it is inefficient and nationalise it. In a productive fabric such as the Italian one dominated by SMEs, long-term investments are needed. SMEs do not have the overall capacity of large firms, so they need external help such as Confindustria. Confindustria has the task of guiding them towards change.

The topic of immigration was also discussed. Since Confindustria follows more "high end" labour, i.e. high-level human resources and strategic figures, it has had less to do with traditional reservoirs of low-skilled foreign labour ("mass worker"). Confindustria's role is to act as a filter against irregularities, while companies have the role of streamlining the integration processes. Characteristics such as faith or language are not considered, but only skills. However, Confindustria is absolutely opposed to an indiscriminate opening up to migrant labour. It is important to create "stabilisation" systems, such as the UK system for evaluating the soft skills of the migrant workers. The focus, however, remains on medium-high skills, whereas not solving the problem of the labour shortage of low-skill sectors. To resolve this problem, Confindustria seeks a process of reconversion of workers who are unemployed, reinvesting mainly in Italian labour. In fact, there will not be the influx of migrant numbers of twenty years ago anymore, since firms are mainly looking for high-skilled workers.

Today's migration is purely a social phenomenon, while the real investment should be made in the second generations, thus avoiding future dangerous areas of social differentiation. The productive fabric is both an opportunity and a set of values. Therefore, in order not to undermine this model, it is necessary not only to seek profit but also to invest in other social values.

3.4.4.3. CGIL

The third interview was with CGIL, this time no longer at the local level but at the regional level (Veneto). Differently from the local framework, the regional level has a closer connection with the central structure of the national level, and a broader and more "political" perspective on the issues discussed. In fact, although the regional trade unions are directly concerned with their geographical area and one of their main aims is the coordination of the various local branches, regional level issues such as immigration and migrant workers' rights are closer to the like of national management, in a "higher" politicised fashion.

First of all, an overview was given of the situation of CGIL, on the total number of members and the sectors of major reference. CGIL now has more members in the trade and tertiary sector, comprised of 50% active members and 50% of pensioners. The tensions that CGIL experiences internally are linked to the budget, especially in moments of economic crisis. After years of public opinion attacks on intermediate bodies, CGIL remains anchored to the principle of protection of all workers, including non-members. However, the critical issues are between collective solidarity and the logic of economic survival. According to CGIL, the role of the trade union is still absolutely central in Italian industrial relations, even if the lack of a "distribution belt" limits the bargaining power of the social partners in ministerial meetings. This is also determined by who is the "speaker" of the moment, i.e., who is in government. If all three major confederations move in the same direction, the results are better overall. The issue of confederal rapprochement is important for good political results, and crises have potentially brought CGIL and CISL closer together. However, if the categories have dealt purely with the dynamics of the economic crises, it is the federations of pensioners that have carried inter-confederal collaborations forwards.

The same tensions can be found with regard to the migrant issue. In the CGIL there is a union "soul" and a political "soul" that clash. The paradox is the same as in other unions, i.e., being oriented towards the left (especially in the case of CGIL) but with many politically right-wing workers, as in the case of Veneto. The CGIL tries to counteract this reality by positioning itself as a

labour protector rather than seeking politically oriented members, creating a less dichotomous stance than other confederations. Labour and collective protection remain the main priorities of CGIL. However, CGIL does not feel that it has an impact on migration policies but can work with other civil society actors and migrant associations. The CGIL is in favour of the return of "sensible" flow decrees, with numbers that can finally cover economic needs (such as seasonal workers). Veneto is seen as a paradigm of collective and individual inconsistency, where populist and right-wing anti-immigrant slogans are strong, but it turns out to be a region economically dependent on the migrant workforce (in sectors such as care, services, tourism and agriculture), without which it could not move forward. Anti-immigrant rhetoric thus clashes with market needs. Migrant workers are an increasingly decisive variable, despite the current political rhetoric. The defence of non-regular workers, on the other hand, has seen positive results in CGIL, but there are inter-category conflicts. Immigrants do not have any kind of *ad hoc* federation, but they are part of the basic categories. The main idea is to avoid political instrumentalisation, even if recently some territories in Veneto have asked to take into account diversity and special needs.

The care sector, as is well known, has a very high percentage of migrant workers, in Veneto as in the rest of the country. Even if the numbers are lower, this is also true in the restaurant and hotel sectors, while in manufacturing there are highly differentiated situations, with a high number of subcontracts to foreigners. The care sector came to a particular juncture during the Covid-19 pandemic, while agriculture is experiencing difficulties linked to restrictions and the phenomenon of *caporalato* (which, however, is not only limited to agriculture, but also logistics and the subcontracting of services). Irregular work in the field of care is determined by the lack of public support due to a deficient welfare system (unsustainable costs), by the ageing of the population, and by family structures (increase in female labour and lack of a mechanism of work-family balance).

On the subject of systemic convergence, CGIL has hypothesised that Japan will perhaps regulate itself, while Italy remains immobile and the price to be paid is dumped on labour. The "blame" lies with capital and thirty years of industrial economic policies without precise guidelines. Governments have also been guilty of "wild" privatisation, ceding important territorial productive sectors abroad. Politics has shown little foresight, preferring, as in the case of Veneto, to strongly support the entrepreneurial class, especially for electoral needs.

The fourth interview returned to the local level, this time delving even deeper into the issues of migration and the rights of migrant workers in Italy. It took place with Mr. Maffi of CGIL Vicenza. He has been working in CGIL since 2003 and has always worked with migrant workers. He has also seen a political phase of CGIL where there was talk of "unions of foreigners" (in 2006

there were 500,000 immigrants out of 6 million total but with a low representation rate). He reiterated how CGIL is different from CISL and UIL on the protection of all workers and not just members. CGIL on the issue of migrants is closer to a street union, and CGIL commitment to these themes is considered the pride for the entire confederation.

CGIL is doing a lot for migrant worker integration, for example with the proposal of the EU card for immigration. Greater collaboration at the supranational level between European trade unions is needed. CGIL, on the stance of inclusion and exclusion of migrant workers within the confederation, had decided since 2012 to dismantle their immigration offices, which remained only in a few places. The motivation, wished for by former Secretary General Camusso, was not to differentiate between Italian and non-Italian workers, so as not to discriminate against the latter with respect to the native population. It was aimed at the differentiated services offered by the union, as a potential diversification factor. The issue that arose from this decision was a greater difficulty on the part of the categories to reach foreign workers, no longer able to use their specificities to involve them in union activities. CGIL also has contacts with many migrant associations, although this varies with changes at the top of the confederation. The critical considerations are already seen at the regional level between universalist and economic logics also reappear in services for migrant workers. If the immigration desks helped foreigners directly, now the "*patronati*"²⁶⁷ act more on a logic of paid services, thus creating a sort of detachment with migrant workers.

The third interview with CGIL, the last of the second set of interviews and performed close to the conclusion of the dissertation, was with Mr. Galossi, head of Coordination Migration and International Mobility Area, INCA National. Even in this case, the process of moving conceptually from the local (or regional) level to the national one was followed. As with the last interview with CISL, the topics focussed solely on the role of CGIL in migration policies and migrant workers' issues, this time with additional considerations on the socio-economic transformations of the Italian economic system and some reflections on the Covid-19 issue. Like most of the previous interviews, this one too was conducted online.

The first topic dealt with was union inclusiveness. As at previous institutional levels, the inclusive nature of CGIL was confirmed, in particular the organisational value towards universal protection of workers, regardless of their national origin. Despite the differences between the three main confederations (in the past CGIL had self-identified as a "pluri-ethnic" union in which

²⁶⁷ A "*patronato*" is an institution in Italy that provides assistance and protection to workers, pensioners and all citizens in the territory of the State. It is a direct emanation of a trade union, employers' association or other types of organisations.

services to foreign workers were fully incorporated into its categories, while CISL has ANOLF²⁶⁸ as an association that acts promoted by the confederation), all of them are characterised by the principle of inclusiveness. Collective bargaining, unions' core value, is by definition inclusive. CGIL's position on migration policies and migrant workers' issues is one of active action, seeking, through political struggles, to combat discrimination and the social dumping of foreign workers. The Italian legislation, which is considered to be insufficiently attentive to rights, does not help the foreign population enough, which suffers great inequality in wages and working conditions. There are serious risks of generalised social dumping and blackmail by employers.

On the other hand, Italian small and medium-sized enterprises (as well as Confindustria) are primarily responsible for the demand for low-cost, low-skill foreign labour, especially from the late 1980s and early 1990s, coinciding with the tertiarisation of Italian society and overall market liberalisation. These necessities caused the growth in the presence of foreigners in Italy, particularly between 2000 and 2007 (the year of the onset of the global financial crisis), and the consequent updating of migration policy regulations in a restrictive measure (particularly with the 2002 Bossi-Fini law). The financial crisis created a high percentage of unemployment and the first to pay the consequences were the weakest groups in the highly segmented Italian labour market, i.e. foreign workers and women. Trade unions have worked to protect these weaker sections of society, though with mixed results. What is CGIL's role in all these phenomena? It is to bring to light the experiences of exploitation in areas of the labour market with a high rate of foreign labour participation (agriculture, construction, etc.), where there are high percentages of "black" and "grey" labour (illegal labour). The aim of CGIL is to counteract employment and social segregation, both horizontally (possibility of changing jobs) and vertically (possibility of career improvement), thus avoiding conflicts with Italian workers. CGIL, in the dialogue between the social partners, works to solve these problems directly in the workplace (factories), at local institutional tables (local bargaining), and national level with the government and employers' associations.

CGIL's power in national-level policy-making, specifically in the technical tables with the Ministry of Labour and the Ministry of the Interior, is divided into two levels: a first technical level, where concrete issues are discussed, and a second political level. On the first level, CGIL is still perceived as an important actor, having good feedback on its ability to analyse and act to improve various socio-economic dynamics. Sometimes the ministries request direct confederal involvement and help. At the political level, however, it all depends on the timing and who is governing. Although the political orientations of the government may be adjacent to those of the union, they

²⁶⁸ In Italian "*Associazione Nazionale Oltre le Frontiere*" (National Association Beyond Borders).

are not automatically a sign of good relations. This was the example of the centre-left Renzi government (2014-2016), or the Conte I government (2018-2019) which, despite the majority presence of the Five Star Movement (FSM, a popular participation national political movement), the unions were punctually ignored on migration issues,²⁶⁹ since the topic was considered too divisive from an electoral point of view. It is only with the current Draghi government that concerted debate (local and national) seems to have been revitalised, especially in terms of competencies.

The participation of migrant workers in the CGIL internal structure is a hot topic at the confederal level. Despite percentage variations by category and/or geographical area, foreign members in the CGIL represent a very large part of its grassroots members. Foreigners see the union as an answer to their problems, vice versa the union offers itself as a "home", or an important component of emancipation. The issue of the presence of foreigners in CGIL leadership areas is still a topic of work in progress. The problem of potential "short-circuits" between Italian politically oriented grassroots members and the universalistic principle of protection of all workers came out of this reasoning. CGIL has only one line of thought and ideological principle, namely that of the universality of rights. When does this "short circuit" occur? When situations are conflictual between the daily trade union activity and the adoption of the principle of universality of rights, in particular at the local level. It is the task of local trade unionists to get this message across to all the workers. In addition, CGIL pushes the concept that membership of the confederation means embracing certain ideals, thus avoiding the dichotomy between workers.

Very interesting is the point of view on the transformation of the Italian political-economic system and the possible economic evolution of the country. While during the 1970s and partially during the 1980s Italian small and medium-sized enterprises remained competitive due to their peculiarities, know-how and the presence of well-organised industrial districts, with the confrontation with the EU market and globalisation dynamics the Italian economic system found itself in serious difficulties. Italian industrial policies are divided into an upper and a lower "path". The former is based on export and production quality, while the latter is based on keeping production costs low. Italian companies have preferred the second path, cost-cutting and precariousness. At the same time, Italy has followed migration policies (such as the Bossi-Fini law) that helped the precarisation process, in a mechanism of contraction of workers' rights and wages. This development triggered a race to the bottom, internally (different domestic geographical areas) and with other countries. Growth has been set aside in favour of the contraction of rights and wages,

²⁶⁹ Two popular initiative issues set forward by CGIL, *ius soli* and the administrative vote of foreign citizens, were ignored despite the high number of citizens' signatures obtained.

but in this way the Italian economic system has no future in global competition. The only solution is a structural change in industrial policies in order to seek an overall qualitative improvement of labour standards. Italy cannot cope with hyper globalisation and liberalisation. It needs the upper path (e.g. in tourism). The Italian productive system and foreign labour have been "feeding off " each other, continuing to carry on this system. How can this problem be solved? By targeting state investment in specific sectors and enterprises, such as in the care sector: with the fast ageing of the Italian population, it is necessary to activate quality training circuits to maximise and improve the *badanti* system.

Lastly, the issue of Covid-19 was briefly analysed. In Mr. Galossi's opinion, the pandemic has affected (and is affecting) weaker sectors of the labour market the most. It is hitting hardest those who generally are employed in the lower strata of the labour market such as young people, foreign workers and women (especially in non-regular and fixed-term jobs). They are the first to pay for the crisis, as was the case in 2008. As today's data show, the current pandemic phase can be ideally overlapped with the 2008 financial crisis, potentially leading to the same disruptive socio-economic consequences.

3.4.4.4. UIL

The fifth and final interview of the first series of interviews was with the UIL of Vicenza. The findings of the interview are in slight contrast to those obtained in the interviews with CISL and CGIL. UIL, first of all, does not see a crisis in union representation, which has affected only the CGIL (the only crisis glimpsed is now with those opposed to vaccines). The union is therefore still representative of Italian labour. UIL is considered, unlike CGIL, the most politically neutral confederation, having never had a political address of reference, and now suffers less from declines in membership. The lack of ideology is also found in examples such as Veneto, where the regional government led by Zaia and the League was based on the quality and concreteness of government. The same is true for UIL, no longer politicised, but efficient on services and protection of rights. The issue of, particularly, non-regular personal care and assistance, is opposed by UIL, which has pressed for contractualisation and assistance to *badanti*. In Italy, there is a greater awareness of foreign labour so that the labour market can remain competitive. The same is true for schools, where there is a general reduction of native students, while second and third generations of migrants are present. UIL is at the forefront of the search for fairness solutions among workers, including

gender equality (albeit with difficulty) and birth extraction. The struggles, especially in the south of the country, are for compliance with regulations for all. On the future of the presence of foreign workers in Italy, UIL assumes that there will be yet others, and the union must adapt accordingly. In the local area (for example Arzignano (VI), an area historically with a great number of migrant workers), the UIL relationship with them is the same as that of Italian workers, because they have the same rights.

Regarding the tension between an area such as Veneto, with a majority of League voters, and trade unions, UIL believes that there are no longer the so-called "hard and pure *leghisti*",²⁷⁰ and the populist anti-immigrant vision of the League ("let's help them at home") is now outdated. Integration into the social fabric is primarily determined by well-being, and therefore higher collective well-being is sought by all. As long as the labour market guarantees work for all, there is no risk of social conflict. In the UIL, there is no difference between the representation of Italian or non-Italian workers, but there are only workers and rights.

On the policies of inclusion and exclusion of migrants by the union, UIL does not make any distinction and has never applied any kind of exclusionary policy. Regulation is a task of the state, while in the private sector it is doubtful that it has ever come about. UIL is also close to employers without any contractual distinction, having to guarantee the same rules for all.

3.5. Analysis of interviews and Japanese migration policy transformations: a convergence hypothesis?

Answering the research question of this thesis was not an easy task at the beginning of this project. Now, after this series of interviews, the situation has not much changed. The interviews, initially, were not solely focussed on understanding the possible systemic transformations in Japanese political-economic choices, its migration policies, labour market economic shifts and the behaviour of Japanese industrial relations actors on the topic of migration. The questions aimed at creating a broader contextual knowledge, necessary to understand complex and still obscure dynamics and mechanisms. The Covid-19 pandemic and the inability to return to Japan, as well as the socio-economic difficulties it entailed, made the search for an answer even more difficult.

This being said, the expected results were different. Initially, the outlook was for a systemic political-economic convergence. Independent of the predictions of the VoC approach, which were

²⁷⁰ The League political militant.

against a convergence of countries belonging to different market economies (Hall, Soskice 2001a), the 2018 ICRRA amendment (Hamaguchi 2019a) and the demands of the Japanese labour market of low-cost foreign labour leaned towards a different hypothesis, characterised by a generalised transformation and change in migration policies according to the market economy needs. However, Japanese capital and labour were very close in their considerations around this issue.

This section covers a more in-depth analysis of the interviews conducted with the Japanese actors. Interviews with Italian subjects are excluded from this segment as they are not useful in gaining a focussed understanding of the research question. In fact, as specified throughout the text, they were preparatory to a better insight of Italy as a country of comparison due to the structural similarities with Japan and as a possible marker of convergence in migration policies and labour market structure.

3.5.1. Japanese Business Representation

3.5.1.1. Keidanren

Keidanren,²⁷¹ the first actor to be interviewed, followed the archetypes of business representation. This organisation is also very close to the LDP government, since it is for its own line of thinking. The domestic economic needs, although primarily on the part of SMEs, are to have a sufficient workforce and flexibility. However, once the pool of available Japanese workers is exhausted, the employers' association and the government are forced to look around. This is even more true in a climate of high competitiveness and global neoliberal pressure.

Keidanren's choices, aware of the demands of the Japanese labour market, are based on increasing the intake of high-skilled foreign workers, effectively limiting the entry of any kind of manual low-skilled labour. The current presence of alternatives to the arrival of new foreign workers, namely technical inter trainees, foreign students and other forms of non-Japanese (precarious) labour, like the case of *nikkeijin*, are sufficient for the interests of capital. A greater and "indiscriminate" intake, as we have repeatedly heard in Western political contexts, would be a serious problem. The labour shortage that has plagued the Japanese labour market since the 1990s,

²⁷¹ For an in-depth look at Keidanren's stance on accepting foreign workers just prior to the ICRRA 2018 amendment, see Keidanren (2018), *Basic Views on Accepting Foreign Workers* (https://www.keidanren.or.jp/en/policy/2018/086_outline.pdf).

on the other hand, needs to be resolved with other solutions, including those just mentioned and greater inclusion in the labour market of women and the elderly²⁷² and the implementation of policies that promote the use of new technologies.

The pressure to have a low-skilled migrant workforce (for "cheap" jobs) comes from another side of the business, i.e. those representing small and medium-sized businesses, such as the Japan Chamber of Commerce. However, Keidanren and the government have the same views on the matter: both are not ready for a greater presence of migrant workers in the Japanese labour market (as well as in Japanese society), especially at a "drastically" rapid pace. Speed is considered the key variable, and a proper assessment of it is what separates successful (limited) change from catastrophe. This approach is consequently leading to slow management on the issue, which is tending towards near immobility (Burgess 2020).

Although migrant workers go to fill those gaps in workplaces that Japanese workers do not want to join, and thus there is uncertainty as to whether the balance in the labour market will yield and eventually be "destroyed" by them, cultural barriers are considered too great an obstacle to solve, especially language barriers. The variable of language learning difficulty, unexpectedly, was shared by all interviewed stakeholders, both on the capital or the labour bench. What is clear from Keidanren is that immigration is not simply an issue related to accepting foreign labour because of the domestic labour shortage. Japan needs to increase the diversity of its workforce and their skill sets to become more globally competitive in the industry and improve its R&D capabilities. Language is a difficult barrier to overcome, as Japanese is basically spoken only by Japanese people (in addition to the fact that not many foreign languages are spoken in Japan), making cross-cultural communication difficult. However, the social costs of accepting people from different cultural and social backgrounds must also be considered. According to the former executive chairman Nakanishi, he believed that "*Prime Minister Abe's real intention is to make it easier for more people from overseas to visit and work in Japan, rather than dwelling on migrant status*" (Nakanishi 2018).

Fundamentally, Keidanren follows what was prospected from literature. Japan being a CME, its business requires high-skilled workers to be placed in high value-added production patterns. The Japanese workforce, thanks to professional training generally internal to firms, has everything that is generally needed for production and innovation. However, what it lacks within native labour can be sought outside the national borders (Ruhs, Anderson 2010), as long as it is high-skilled (Hall,

²⁷² The Japanese Employment Measures Act (in Japanese 雇用対策法, or *Koyō taisaku-hō*), in relation to the entry of unskilled foreign workers, suggests that the participation of Japanese youth, women, elderly, and disabled people should be obtained first before resorting to foreign workers on temporary contracts (Yamada 2010: 6). Keidanren basically follows this governmental policy.

Soskice 2001a; Thelen 2004; Menz 2009). Change on this aspect of business is unlikely, and that can only come from the pressure of small and medium-sized firms and socio-demographic assessments. After all, the LDP government has been adamant in rejecting migration policies that could help that part of the firm, until the "historic" easing with the 2018 ICRRA amendment (Hamaguchi 2019a).

Basically, Keidanren is not aprioristically opposed to new migration in Japan. Already since 2009, it has been possible to find migration policy recommendations addressed to the government on this matter (Keidanren 2009).²⁷³ The recurring theme is to develop and retain talented international human resources. Rather than the labour shortage or demographic issues, employer representation is focussed on countering global economic competition, even if it means changing the labour market ecosystem internally. What Keidanren has been asking the government for years is the development of labour diversity in its economic society by incorporating new know-how and values (Roberts 2013: 213-214).

For Japanese employer associations, at least the ones representing Japan's large firms and corporations, no systemic transformations are expected. Just a defence of traditional values and behaviour, that are always based on the needs of domestic capital. And this is basically a mirror of the political thinking of the LDP government. The Japanese government's policy of accepting (limited) foreign workers meets the challenges of securing human resources to support the country's social life and industrial infrastructure, as well as overcoming SME labour shortage problems. Basically, the government is already doing everything necessary on this issue and Keidanren shares the same stance (Keidanren 2018). If what has been described could have been expected by employer representatives, what has been achieved by Japanese unions may seem less obvious.

3.5.2. Japanese Labour Representation

3.5.2.1. Rengō

The Japanese unions interviewed were three, all at different levels within Japanese labour and diverse by overall sizes: a national confederation (Rengō), a national federation (UA Zensen), and

²⁷³ Among Keidanren's various proposals were a Basic Act on the Acceptance of Foreign Workers, a Foreign Workers Employment Act, a Minister of State for Special Missions, and an Agency for Foreign Residents (Keidanren 2009; Yamada 2010: 15).

an amalgamated union led by foreigners (Tōzen Union). Their political orientations, like their positions on the issues discussed, were different and not without paradoxes. While Rengō may be a left-oriented confederation protecting traditional Japanese labour, UA Zensen is a politically right-wing oriented federation that nevertheless covers labour market areas typically close to non-regular and historically less organised workers. Tōzen Union, which calls itself a fighting union, is a more classic left-wing union that has developed its own areas of specialisation and whose almost total membership is made up of foreign nationals.

Rengō, the second labour market actor interviewed, is arguably Japan's most famous union confederation and labour representative of the country's political-economic system. Although Rengō is not *a priori* opposed to migrant workers, it does not really follow the transformations of union systems towards an active search for equal conditions and wages for all workers (Menz 2009), but it is still anchored to the principles of protectionism towards its own grassroots membership, represented especially by manufacturing workers. Like Keidanren and the LDP government, Rengō follows HR perspectives typical of CMEs (Hall, Soskice 2001a), valuing only the arrival of high-skilled migrant workers as a positive way to fill the gaps and needs of the upper end of the dualised labour market (Piore 1979). Rengō's general stance is of firm opposition to opening up the domestic labour market to foreign workers, despite the decades of labour shortage problems in some (manufacturing) sectors, the ultra-low birth rate and the rapid ageing of the Japanese population.²⁷⁴ The solutions to these issues, at least to the problems of labour shortages and the request to cut production costs of SMEs, are to be found internally, in the elderly (raising the retirement age to over 70 years) and in the increased participation of women in the labour market (still too low).²⁷⁵ Foreign labour is considered a potential source of social unrest because, as already stated by Keidanren, the language is too difficult a barrier to overcome and without speaking Japanese it is impossible to stay in the country.²⁷⁶ Furthermore, the positive situation of

²⁷⁴ Although "guaranteeing the rights of all foreign workers" is one of Rengō's most recent guidelines on the issue of accepting migrant workers since the 2018 ICRRRA amendment (Rengō 2018a, author's own translation).

²⁷⁵ "*Besides improving the treatment of irregular workers*". Also, on the topic of transparency and setting cross-industry standards, Rengō stated that "*transparency should be ensured before discussing whether the industry is truly understaffed, whether it is using domestic means of securing human resources, and whether it will affect the working conditions of domestic workers*". (Rengō 2018a, author's own translation).

²⁷⁶ These perceptions are also confirmed by a survey performed by Rengō in 2018 on attitudes towards acceptance of foreign workers. The survey had been done to get information about Japanese workers' positions on the issue of migrant labour just prior to the 2018 ICRRRA amendment. In the survey, as regards the topic on "Japanese language skills required for foreign workers", it is reported that "32.4% answered that they can understand Japanese at the level of work, 35.2% answered that they can understand Japanese at the level of daily conversation, and 67.6% answered that they need to understand Japanese at the level of daily conversation. On the other hand, 16.3% of respondents said they could understand Japanese at the level of simple daily conversation, 4.5% said they could train after entering the country even if they could not speak Japanese at the time of acceptance, and 1.0% said they could not speak Japanese at all". (Rengō 2018b, author's own translation).

the Japanese economy (at the time of the interview) may only be a momentary phase, but at the moment of a negative economic downturn they would be the first to lose their jobs, creating potential situations of social friction (as has already occurred with the *nikkeijin* after the bubble economy period). The issue of technical interns, on the other hand, is actively addressed by Rengō, which demands respect for human rights, that they are not unfairly treated in terms of working conditions and that they not be treated simply as low-wage workers. The precondition is that there should be harmony with the domestic workforce (Rengō 2017; Rengō 2018a).

An important consideration was made for the Japanese care service. Rengō, admitting the important role of this specific sector for the problems of the rapidly ageing population and comparing this dynamic to Europe, thinks that it is impossible to use foreign labour to the same extent since it would be too difficult to manage adequate training and deal with the language tests, as demonstrated by the (partial) failures of the EPA accords.²⁷⁷ Although this reasoning was later refuted with the 2018 ICRRA amendment, which opened up the possibility of more mid-skill migrant care workers and the language barrier, but more generally the cultural barrier, stands as a crucial obstacle.²⁷⁸ The care sector problem, again, should be solved internally. Since care insurance was introduced twenty years earlier and a meagre welfare system are not enough, the solution would be to raise the salaries of native professional care workers to make this profession attractive throughout the country. Rengō, at the time of the interview, was active with the government in discussing this issue.

Rengō then consistently criticised the ICRRA 2018 amendment.²⁷⁹ In a statement by former Secretary General Aihara Yasunobu (12/18/2018), he criticised the pace with which the bill was passed, as well as the lack of sufficient debate on it (Aihara 2018; Rengō 2018a; Burgess 2020).²⁸⁰ In a broader critique of the technical intern system, the new law risks being merely a reiteration of what it has seen so far in the Japanese labour market. Especially the *Tokutei Ginō Ichi Gō* (type 1), which turned out to be a further extension of the technical intern system and a formalisation of this system of guest working disguised as a period of professional training (Aihara 2018; Burgess 2020).

²⁷⁷ Rengō had criticised the EPA agreements as early as 2010, stating that "[Japan should be careful that] these partnerships do not lead to overly easy acceptance of foreign workers" (Rengō 2010, in Yamada 2010).

²⁷⁸ On this topic, Rengō stated that "Regarding Japanese language proficiency, 'N4' or higher is required when entering the country. In addition, nursing care should be considered as a standard that exceeds the Japanese language proficiency standard in technical internship ('N3') one year after entering Japan". (Rengō 2018a, author's own translation).

²⁷⁹ However, Rengō has never hidden its refractoriness to the relaxation of Japanese migration policies. In his 2016-2017 Action Policies, it was stated that "with regard to foreign workers, RENGO will urge the government not to relax eligibility requirements and to easily provide residential status and work qualification to foreign workers" (Rengō 2016). This theme appeared several times throughout the interview.

²⁸⁰ Due to the quick and short deliberation, and the lack of sufficient detail, the amendment has even been called a "carte blanche" law by opposition parties (Burgess 2020).

In fact, despite being allowed to change jobs (unlike the technical intern system), *"the transition to the other job is difficult because of the difficulties of when they find the new job and housing so there is a fear that foreign workers will be held in precarious conditions"* (Aihara 2018). Despite this, Rengō reiterated that regardless of the doubts about the amendment and the presence of more (not high-skilled) migrant workers, *"All workers' rights to work in Japan should be protected no matter where they are from. Foreign workers are ordinary citizens who live in local areas at the same time. Government should secure efficient budget and take responsibility to adopt co-living policies like Japanese-language education, public service and multi-culture understanding. JTUC-RENGO will undertake not only supporting foreign workers through consultation and organisation but realisation of environment which all workers in Japan can work and live with security together with affiliates and locals."* (Aihara 2018).

Despite its prominent position in national labour industrial relations representation, Rengō shows that it suffers from Japan's traditional system of enterprise unions' predominance, which is focussed on the protection of firm-specific workers only. Rengō, having to virtually protect all labour in Japan, finds itself in a position of relative weakness, or at least lacking sufficient political power for this task. While this power is sufficient to protect regular workers, it is not enough to protect non-regular workers and, consequently, migrant workers. This leads to an overall weakness in lobbying the government on migration policies as a function of the labour market. It is clear that Rengō is not projected towards systemic change and a shift in the domestic political-economic regime, or at least not in favour of it.²⁸¹

3.5.2.2. UA Zensen

UA Zensen is a more interesting case concerning the paradoxes of dualised labour market sectors and migrant workers. It is a very large union (the largest industrial union in Japan and the largest within Rengō), with 1.79 million members from 2,326 affiliates, specialising in distinct sectors of the labour market. Politically, it is oriented to the right. At the same time, its main sectors (textile, garment, pharmaceutical, cosmetic, chemical, energy, ceramic, building material, food, commerce, printing, leisure, service, restaurant, welfare, medical, as well as temporary agency and contract work) have the highest number of non-regular, part-time and dispatched workers. Consequently, as

²⁸¹ For more on Rengō's views on the topic of migrant workers, see "Union's view on the policy of accepting foreign workers" (Rengō 2017) and "Efforts for the Establishment of a New Status of Residence for the Acceptance of Foreign Human Resources" (Rengō 2018a) (in Japanese).

in all labour markets of advanced economies, also the highest number of foreign workers. Generally, UA Zensen's positions are the same as Rengō's, and therefore of the LDP government.

One of the first themes addressed was that of the care sector. The issue is even more evident in a union like UA Zensen. Similar to Rengō, the problem of low wages is acutely recognised. The solution of foreign workers as cheap labour for the shortages of this sector, already tried in previous decades, was considered a failure and no longer adoptable. New legal regulations, especially for migration flows from neighbouring Asian countries, have tightened, and according to UA Zensen, Japan's low wages and not-so-high growing rate have made migration to the archipelago less attractive. Not least, it is the Japanese labour system, which does not give foreign workers any confidence in the possibility of employment integration and to rise socially, that is a major deterrent to migration. The long working hours typical of Japanese work culture are another crucial obstacle. The solutions, according to UA Zensen, at least for the care sector, are to follow the example undertaken in some middle-sized cities by their local governments, that is to centralise their care structures in a community way, thus creating compacting services and *de facto* limiting the dependence on cheap foreign labour.

On the topic of migrant workers, an interesting note was made of the strong diversity in the sectors of employment compared to the Italian case. In fact, in Japan they are little present in tourism (few in hotels) but can be found almost exclusively in commerce and food processing. During this interview, as with Keidanren and Rengō, the linguistic problem immediately arose. In this case, language is by far the biggest problem. Without adequate knowledge of Japanese, it is impossible to understand the work rules. This is the case, for example, in supermarkets, where foreign workers do not understand contracts, making it impossible for them to work in those environments. This problem has the consequence that employers, thinking that they do not know Japanese, do not want to hire them (although it has been reported that for customers there is no great difference). These are cultural barriers in the workplace, resulting in other kinds of "short circuits". While it is natural for Japanese employees to clean a supermarket before and after working hours, for foreign workers who follow the schedules in their contracts, it is more difficult to internalise.

One principle that UA Zensen prides itself on, like Rengō, is not discriminating against non-Japanese workers as far as Japanese workers are concerned. The principle is equal pay for equal work, regardless of nationality. However, like Rengō, UA Zensen's stance is not to open up the Japanese labour market to new migrant workers. UA Zensen focusses on its members, regardless of nationality, but has no universalistic purpose. However, as an industry union, they think that

cooperation between firms, unions, and migrant workers is essential and therefore foreign workers should be accepted. Of course, the mechanism must be reciprocal, and they must accept the rules imposed by the Japanese labour market and society. A different issue is that of technical interns, whose system should be limited because it is detrimental to them and the entire labour market. UA Zensen deviates from this government programme, not wanting to get too involved in it.

A fundamental problem perceived by UA Zensen is its lack of political power, especially within Rengō. This deficit limits its decision-making potential and relative weight in tripartite bargaining. Problems range from its differing political orientation (UA Zensen as a right-wing oriented union vs. Rengō as a left-leaning union) to UA Zensen being viewed as limited in its ability to organise workers. The trade sector, of which UA Zensen is the strongest representative of Japanese labour, has a different position from Rengō's. The latter, covering mainly the classic sectors of the Japanese labour market (manufacturing, automobile, etc.), is considered a bit too capitalistic-oriented and less close to the now extremely important sectors of domestic labour. Therefore, UA Zensen's power of policy-making is limited, making it necessary to think about the creation of a different industrial federation that can bypass the classic actors of Japanese industrial relations (government, Keidanren, Rengō). From this line of reasoning, it is clear that, due to a non-automatically negative stance towards migrant workers (at least those who are already present within the labour market), UA Zensen does not have much room for manoeuvre on this issue. What it would like to do, and what it foresees for the future, is an adjustment of all workers to core regular labour standards, also through the contribution of new technologies which Japan is a vanguard of (which would serve not only to increase productivity but also to transform part-time jobs into full-time ones, thus having a positive impact on all employment positions). However, such thinking leaves no room for economic systemic changes, let alone a transformation of the Japanese market economy through a broader liberalisation of migration policies. The solutions to the problems of SMEs and market sectors occupied predominantly by non-regular labour are to be sought internally, in the adjustment of contracts (part-time, dispatched, etc.) and wages to those of core regular workers.

3.5.2.3. Tōzen Union

The interview with Tōzen Union, this time from Italy via an online platform, definitely went deeper into the research topic. As Tōzen Union is a union composed mainly of foreigners, the focus was inevitably on the dynamics regarding migrant workers in Japan.

The interview started from an internal critique of the Japanese labour representation structure: the lack of a general vision of the three main confederations to organise workers (all of them). From this starting point, they moved on to the issues of Japan and foreigners. Basically, Japanese society revolves around a clear incompatibility between the *uchi* - i.e., internal, Japanese - and what is *soto* - i.e., outsider, alien, foreign (Doi 1986; Reischauer, Marius 1995). The distinction between Japanese and non-Japanese is a basic assumption division of Japanese society. This is aggravated by the fact that in Japan, foreigners are often (but not always) visible at the phenotypic level, a factor that creates sub distinctions by skin colour and nationality among migrants (the so-called "social pyramid" of foreigners (Shipper 2008)). The "stubbornness" in the search for ethnic and cultural contiguity and social homogeneity, as well as the hostility to consider other forms of solutions to Japanese structural problems, has only fuelled the dichotomous differentiation of the "othering" processes towards what is foreign/diverse/external (Arudou 2015). This is all part of what Arudou (2015) refers to as the "embedded racism" of Japanese society (Arudou 2015), a differentiating and excluding process between those who, precisely, are part of the *uchi* and those who are excluded from it, falling into the *soto* camp.

Like UA Zensen, Tōzen Union also suffers from the same issue of lack of political power in Rengō, in its case for the reason of being too small. Even on the migrant worker topic, while it could potentially have a greater voice than other issues, it remains limited by its overall size. Rengō actively sought out Tōzen Union, but according to them in order to be able to "boast" of having "talking negroes" within it, i.e., a representation of a (numerically limited) diversity that could give Rengō a semblance of representation diversification. Tōzen Union, despite having a Japanese president, is seen as a foreign union, unique in the panorama of Japanese unions, and therefore suitable for the role attributed to it by Rengō. Since the Japanese confederal system is extremely hierarchical, as is its society, being within Rengō is seen as a chance to overturn this type of extremely rigid structure from within. Especially considering that Rengō is no longer as strong as it was in the past (the decline in strength can be attributed to the economic transformations of the 1980s and the general labour movement weakening wished for by Prime Minister Nakasone). The absence of antagonism with management is another weakness of Rengō, making it immobile and lacking in strength to protect the interests of labour.

The contrasts between Rengō and UA Zensen, the latter seen as exponentially right-wing, anti-union and connected to the pro-military position and eager to change the anti-militarist Japanese constitution (an objective of part of the LDP for many years), creates a deep schism between the two organisations. Rengō's decision-making area, not so much leaning to the right, sees itself as weak in the face of UA Zensen's increasing power. These positions also erode their overall view on the phenomenon of migrant workers. The foreign labour force is seen by them as dangerous and detrimental to the harmony of Japanese society and its labour market, while the problems of labour shortages, especially of SMEs, are to be solved with under-employed domestic workers, especially women. Former Prime Minister Abe's policies of increasing women's participation in the labour market are in line with the thinking of Japan's major labour unions. The aim of creating a new domestic workforce and removing the international low-ranking status of Japan on gender discrimination has created the possibility of a win-win situation and the creation of a new pool of cheap domestic labour. Despite a slight opening up to the entry of foreign female labour, in particular in housekeeping and care, they remain the weakest workers in the Japanese labour market. Not knowing the language (but this is seen positively in some sectors, as it is possible to exploit this characteristic) and their contractual volatility make them perfect flexible workers, like now in the case of the Covid-19 pandemic and the economic downturn.

Overall, Tōzen Union does not see any Japanese "grand design" for accepting new migrant labour, even with the 2018 ICRRA amendment. In fact, former Prime Minister Abe repeatedly reiterated the fact that this was not a new migration law (although it is a *de facto* migration law since some sectors of the labour market survive with it).²⁸² One major change was the 2008 recognition of the technical interns as fully fledged workers, but this did not solve the problems that plague this system, such as the lack of enforcement of labour laws on minimum wage, working hours, or employer seizures of passports from foreign workers.

Even from the perspective of labour, especially from Rengō, policy-making on the migrant worker issue is almost non-existent. ICRRA's 2018 amendment demonstrated only a strong alignment between business and labour benches, where the latter pushed harder for opening Japan up to new foreign workers (even Keidanren, which does not directly represent SMEs). Rengō, in fact, has shown caution about the risk of downward pressure on wages and contract terms that cheap foreign labour might bring to their members, turning a potentially supportive stance into one of hostility to change. With the declining rate of Japanese wages, the fear of higher taxes for

²⁸² Indeed, former Prime Minister Abe agreed to the 2018 ICRRA amendment on the condition that it was not an immigration policy and that workers were not considered as such. His words were "移民でわないうなら/*imin dewa nai nara*", meaning that "they were not immigrants" (Yomiuri Shimbun Dec. 11 2018, in Burgess 2020).

welfare spending (exacerbated by Japan's ageing population), the need for capital to have more cheap flexible labour, and Rengō general pro-management stance, the LDP government has been playing the "divide and conquer" game with all stakeholders.

The other trade union confederations play too limited a role. Zenrōkyō has a general stance close to migrant workers and its political pressures are primarily to fight against discrimination. However, it is also the smallest of the three. Zenrōren, on the other hand, shows less awareness of this issue. Rengō basically does not want to "get its hands dirty" on the issue of migrant workers so as not to undermine the support of its grassroots members, leaving small unions like Tōzen Union the role of giving the impression of interest and diversity of representation within the confederation.

More caustic is the view of Japan's future concerning the possibility of greater openness to migrant labour. Against a backdrop of declining wages, a steadily worsening economy since the late 1980s, and pessimism among the native population about the country's future, the issue shifts not to whether new foreign workers can enter, but whether they are willing to come to work in Japan. The language barrier, a recurring theme in the interviews, returns here as well. Japanese society's rigidity to foreign linguistic permeability has made Japan the worst among Asian countries for English usage, and therefore less attractive than neighbouring countries in this respect as well. With this finding, Tōzen Union does not deny an increase in the presence of foreign workers in the country, potentially with greater knowledge of Japanese prior to their entry. The country's good level of infrastructure, overall security, and good average standard of living still make it an economically attractive country to migrate to. The government will likely open up for more (or different forms) of permanent residency, while also considering the positive contribution that new foreign residents can make to taxes and the current negative demographic dynamics. At the same time, strong political populism and extreme forms of nationalism, especially in the countryside, are reasons for difficulties in implementing these changes.

As to the explicit question of a possible systemic convergence between the Japanese model and the mixed market economy model on the topic of migration policies as a function of the labour market, Tōzen Union gave a clear-cut answer. Japanese society and the LDP government do not feel the urgency of this change. On the contrary, the comparisons made by the Japanese media with the migratory phenomena in the United States and Europe have created a sense of fear and a strongly negative image of the figure of migrant workers. However, this transformative political-economic movement is taking place, even if very slowly, like many other dynamics within Japanese society and the Japanese labour market.

3.5.2.4. Zenrōren

The last interview with Japanese labour representation was also the last one conducted, almost at the end of the doctoral programme (November 2021). It was with the second-largest confederation by membership and importance in Japan, Zenrōren. In this case too, as with Tōzen Union, the interview took place from Italy through an online communication platform and was also more focussed on the research themes and the search for an answer to the research question of the thesis.

The confederation is associated with the Japan Communist Party, and this is evident both from the confederation's guidelines and throughout the interview. It is unequivocal, as with the CGIL in Italy, that Zenrōren is for more universalist protection of workers than the classical Japanese trade unionist system. The safeguard of the *three sacred treasures* typical of Japanese industrial relations, namely lifetime (or long-term) employment, the *nenkō* (seniority wage system) and the enterprise-based union system (Nakamura 1993) are not the backbone of the organisation, as it is for Rengō. In fact, during the course of the interview, a clear differentiation between the two organisations was repeatedly stressed, for example how Rengō is rooted in traditional standards of labour representation (large enterprises, public sector, energy sector, automotive, etc.) and its collaboration with management, while Zenrōren represents structurally weaker labour but fundamental to the Japanese productive system (SMEs, construction, transport, care, metalworkers, part of the public sector, etc.), being more progressive and militant in its nature. The problem, in all the issues discussed, is the exclusion (almost total) of Zenrōren in the tripartite system of consultation in the ministerial commissions (advisory councils), whose only actors are the government, Keidanren and Rengō, *de facto* excluding a relatively large section of labour. As a result, many universalist values are often excluded from ministerial negotiations, including migrant worker issues. Moreover, as was reiterated during the interview, the Japanese labour market is traditionally extremely conservative. Although Zenrōren's main topics of interest are the minimum wage, workers' rights, the abolition of nuclear energy, the protection of the "pacifist" Japanese Constitution and the revision of the welfare system by expanding public health, the issue of migrant workers is an active part of the confederation's principles.

The Japanese labour market is as conservative as its migration policies. Japanese migration history since the end of World War II has been emblematic in this sense. First with the *zainichi* at the end of WWII, then with the *nikkeijin* since the 1990s, and finally with the trainees, the Japanese labour market has created a barrier of hostility for the presence of foreign workers in Japan. In all

these cases there have been different issues and many forms of discrimination. None of them has the right to vote,²⁸³ symptomatic of how Japanese society on a systemic, cultural and labour level does not accept them.

In the case of the *nikkeijin*, the so-called ethnic contiguity has failed due to multiple problems (linguistic, cultural, social), while for the trainees, despite numerous reforms to the law that regulates their presence and possibility to work, the problem of exploitation and lack of regularity in their employment has never been completely resolved. In another labour scheme, more limited in terms of numbers, such as the EPA accords, have in turn failed due to a series of structural rigidities inherent in the mechanisms of access to the Japanese labour market and its society, from language to the transposition of work practices. Zenrōren, like Rengō and UA Zensen, sees the overall weakness of the TITP. Like Tōzen Union, it glimpses the lack of a positive environment for non-Japanese workers. Like all the actors interviewed, it sees an underlying division and impossibility to a full acceptance of the foreign worker in Japanese society and the labour market. Language returns as an impeding paradigm, the first physical (and non-physical) barrier to entering the country and being able to work in it. Criticism of the technical intern system is present in all the interviews, but it is more pronounced with Tōzen Union and Zenrōren, defined by the latter as a system of "modern slavery", also due to the system requirements that interns cannot choose companies to accept or move to other firms (Zenrōren 2018). Moreover, Zenrōren specifies that it is not only the traditional sectors that are affected by the labour shortage, especially the *3Ks*, or the newer ones with low added value such as services but also agriculture. The agricultural sector experiences the same dynamics described above, but with less relevance in the public discourse. Zenrōren's action to protect and defend migrant workers is active, especially through its community-based affiliates. Not being in the tripartite system, its actions at the central level are through lobbying to parliamentary members, especially regarding whether or not to raise the issue on migration, on the problem of abuse of asylum seekers and the abolition of the TITP (or at least for its revision allowing greater inter-firm mobility and less control by the TAS).

Zenrōren's strategies are mainly twofold: to work on migrant workers' issues with the community unions (their affiliates) based on individual needs, and to involve migrant workers directly in union participation. The overall strategy is to have migrant specific unions and community-based unions opened up to the general public. It is also important to have, especially in

²⁸³ In classical migration sociology, the right to vote, and thus migrants' political incorporation, turns out to be the culmination of the assimilation process (Gordon 1964). In the case of Japan, despite the fact that permanent foreign residents have almost the same rights as Japanese citizens, the former do not possess the right to vote and take government positions (Chung 2010). They are considered "denizens" or "quasi-citizens", e.g. long-term or permanent residents who are not further interested in becoming citizens of the host country (Hammar 1990).

large migrant populated areas (e.g. Hamamatsu in Shizuoka Prefecture and Toyohashi in Aichi Prefecture), assistance and information in Japanese, English and Spanish (or other languages). It is the union system that has to adapt to the different situations. On inclusion/exclusion policies, Japan experiences different socio-economic realities. Some unions are very active (even "aggressive") in the representation of foreign labour, while many enterprise unions are often totally uninterested. Generally, unions do not have a specific policy on this matter. According to Zenrōren, it depends on the specific company, but some big enterprise unions it seems that they are not interested so much in organising migrant workers.

A large part of Zenrōren's policy action regarding migrant workers was devoted to the 2018 ICRRA amendment. After an initial critique of the amendment's approval, which was considered too fast (Zenrōren 2018; Burgess 2020), objections were focussed on the technical intern system, which has been criticised at home and abroad for violating Labour Law, Immigration Law, and human rights, too. Zenrōren actively opposed the policy of expanding the acceptance of foreign workers, despite the labour shortages affecting Japanese SMEs. The reasons for this stance are numerous, and Zenrōren points out that its claims are not based on an anti-foreigner principle, but on putting pressure on the government to create an *"environment that enables coexistence between foreign workers and Japanese living in Japan"*. For Zenrōren, the first priority is the creation of a society (and a labour market) that allows full international mobility, without any economic constraint. A society free of discrimination and irregularities is therefore necessary, strengthening services that can help with the difficulties encountered by migrant workers (e.g. language barrier, etc.). It is necessary to examine the impact on the domestic labour market and the local community while improving poor working conditions, regardless of the nationality of the worker. Although the input for new migration policies is the domestic labour shortage, migrant workers should not be considered disposable labour. Therefore, a new system of eligibility for residence must be created, without the human rights restrictions on foreign workers of the 2018 ICRRA amendment (for example by not being able to enter and live in Japan with one's family), as well as a limitation on current racist and xenophobic political movements. Fundamentally, Zenrōren bitterly opposed the 2018 ICRRA amendment, but not for the protection of core regular workers as per Rengō, but for a structural need for Japanese society to change its grassroots limitations and weaknesses, granting foreign workers the same rights as Japanese workers and improving policies necessary to build a society where foreign workers and their families can live comfortably and coexist with Japanese citizens (Zenrōren 2018).

The topic of Japan's socio-economic transformation and possible systemic convergence was treated by Zenrōren in light of the current situation of the welfare system. In particular, the critical socio-economic issues aggravated by the Covid-19 pandemic. Internal transformations, due to the ageing society, are inevitably linked to the current (meagre) Japanese welfare state and the lack of doctors and care workers. As stated above, Japan's number of doctors and medical staff per capita is below the OECD average (OECD 2021a), and the welfare system is under pressure from previous decades' neoliberal reforms. Thus, it is first of all necessary to change the austerity policy on welfare, particularly on the medical and aged care system. The aged care sector, in particular, has pretty low wage standards and exploitative working conditions, so the government needs to put more money into these sectors.

To solve some of these problems they need to open up to foreign labour. However, it must not be an unregulated opening up, as problems already present in Japanese society and the Japanese labour market must be first considered and systematised. One of these is the problem of the prefectural differentiated minimum wage, which creates some areas where the minimum wage is below that of South Korea. This situation is detrimental to the pull factors for migrant labour of the Japanese labour market, with migrant workers preferring other Asian countries as destinations (such as South Korea, which abolished its equivalent of the TITP and organised a migration policy based on a controlled system). Although even in South Korea migrant workers suffer from low wages and in terms of job and social security, standards are better than in Japan.²⁸⁴ It is interesting that in spite of what has just been described, the Labour Law, like the Japanese Constitution, does not discriminate in any way against migrant workers compared with Japanese workers in the labour market and working standards. However, foreign workers are often subjected to various forms of discrimination by employers, demonstrating limited (if any) protection of their rights. This is one of the current limitations of Japanese unions on this issue.

The last topic covered is that of potential convergence and on the future policies of the Japanese government. Zenrōren is sceptical about the possibility of change in the LDP government's economic and migration policies. On migration policies, they may be slightly open in some specific areas or sectors of the labour market, but it depends solely on the demands of capital

²⁸⁴ South Korea and Japan are close regarding the uniqueness and homogeneity of their population. In fact, the Korean *Hangukiron* (한국인론, the discourse that places a relationship between the purity of the Korean race/nation/culture (*minjok*) and that country's high level of economic success) turns out to be the equivalent of the Japanese *Nihonjiron* (日本人論, "theories about the Japanese/discourses of Japaneseness", a genre of texts that focusses on issues of Japanese national and cultural identity, their peculiar social formation, cultural practices and national mentality) (Befu 1993), presenting a number of striking similarities (Hurt 2014: 26-27). However, the Korean disruption from this ethno-nationalist narrative can be traced back to 1997, followed over the years by a substantial number of progressive national policies aimed at multiculturalism (Burgess 2020).

and business. Zenrōren, on the other hand, aware of the problem of the rapidly ageing population and labour shortage (especially for SMEs), is in favour of opening up to the entry of migrant workers, but this must follow certain rules and ensure the protection of migrant workers themselves. In the care sector, where there is already a pretty small labour scheme to invite care workers (the EPA accords) from the Philippines, Indonesia and Vietnam, there are still obstacles that are too great and which determine its failure. The language barrier, a recurring theme throughout the interviews, lack of control and lack of transparency to society and business. More openness is possible, but in critical sectors such as healthcare, agriculture and construction, a controlled acceptance system is needed. It is, therefore, necessary to have a mechanism based on a tripartite control scheme, in which employers, unions and workers all join together. Ultimately, a stronger controlled labour scheme coordinated between all social partners is needed to be more open to migrant workers.

When asked about systemic transformations in the labour market, migration policies, and Japanese society, Zenrōren expresses much scepticism. In particular, Zenrōren has a strong impression, due to the recent general election result, that Japanese society is not changing. This is also the message that the country is sending to the international community. What gives hope for a future change are the younger generations, bearers of greater potential for activism and awareness of social issues. The change of Japanese society starts from issues that interest young people more closely, such as gender equality or climate crisis issues, and also the nuclear weapons abolition issues. Greater activism, equal to that of young Europeans or North Americans, make Zenrōren "*very hopeful*" that younger Japanese generations can change their society (even if they are less active than their European or North American counterparts). Conclusively, although at this historical phase political inertia determines immobility in the socio-economic change processes (and thus convergence towards other systems), Zenrōren predicts that "*maybe a little bit later than other countries*", Japan, too, can move towards socio-economic systemic variations. Consequently, an albeit slow process of labour market transformation through structural changes in Japan's approach to migration policies is inevitable.

3.5.3. Civil Society

3.5.3.1. Nichibenren

The interview with the Japan Federation of Bar Associations was helpful in gaining a perspective from a non-state actor not directly related to the Japanese labour market or its economy. Japanese civil society is quite active in protecting the rights of migrant workers (Brody 2002; Shipper 2008) and is well known for being a point of reference for a still relatively small foreign population. Although it was not possible to discuss the issue of systemic transformation of the Japanese labour market or the convergence of migration policies for economic purposes, it was possible to find interesting views on the current situation and future prospects of foreign workers in Japan.

Labour shortage is perceived in all economic areas in Japan, especially in the more traditional sectors of the Japanese labour market (3K sectors such as manufacturing, construction, etc.) due to the lack of low-skilled native workers willing to work in them (Watanabe 1990). These labour market sectors are also the most concerned about international migration patterns. At the same time, there is criticism of the Japanese trade union system, which is considered unsuitable for the protection and organisation of migrant workers, except in particular cases (e.g. Zentōitsu Union,²⁸⁵ which is particularly focussed on the problem of trainees). The only levee for their protection is the NGO and civil society. Even the Japan Federation of Bar Associations, basically, is more involved in cases concerning trainees, a category hit hardest by the paradoxes of the absence of proper migration law for low-skilled workers and instead of being a *de facto* system of guest working beset with human rights issues (Burgess 2020).

Ultimately, despite the fact that the Japan Federation of Bar Associations has foreseen a steady increase in the presence of migrant workers in the country, the lack of economic attraction already described by Japanese labour representation is considered the main variable of incentive loss to come and work in Japan. While current wages are still high, they are expected to decline in the future. According to these perspectives, transformative processes, in progress (but at a very slow pace), have been underway for some time, lacking sufficient structural solidity and socio-economic prospect to initiate a systemic conversion of Japanese migration policy, basically because of the scarcity of strong pull factors for migrant workers (Piore 1979; Brody 2002; Jennissen 2007). This opinion, however, remains a socio-political view related more to the personal decision of the migrant (workers) rather than the economic needs-filtered reasoning of SMEs and the domestic labour market (Hollifield 1992; Sassen 1996; Brody 2002; Jennissen 2007).

²⁸⁵ For more information on Zentōitsu Union (全統一労働組合), see <http://www.zwu.or.jp/>.

3.6. Italy and Japan: similarities and differences between economic actors within and between the two countries

Following this description and analysis of the interviews, how can the empirical experience be synthesised with the theory addressed in this thesis? Despite the fact that the partial answer to the research question is to be found within the Japanese contribution of the interviews, observations and implications that can be grasped from the relations between and within economic actors, should not be overlooked both within the same country (Italy or Japan) and between the two countries (Italy and Japan). In particular, the similarities and differences between the behaviour and political-economic policies encouraged by the institutional (socio)-economic actors, both in the more traditional forms described in the literature as well as in more unexpected patterns, may be of interest. This section is a synthesis of what has just been outlined, with the aim of trying to complete the theoretical framework formulated during the three chapters of the thesis as well as trying to introduce the conclusion of this last empirical section.

The behaviour of the employers' representatives is exactly as described in the literature. The two actors interviewed, Confindustria and Keidanren, pursue exactly what is detailed as the essential needs of capital. Their actions are for the support of the firms they protect, while at the same time they are concerned about broader economic interests of the labour market and the domestic production system. The interaction with the other economic actors, state and trade unions, corresponds to the different employers' needs with respect to the particular national political-economic framework. Clearly, Confindustria and Keidanren have differences between them, but they basically pursue the same objectives and hold a similar position in domestic industrial relations. They react to production needs and market difficulties: if employers need a specific type of labour, they will lobby centrally to achieve that result; if the necessary labour force is not provided by the domestic education channels, they will lobby to liberalise new entrants from abroad. Their collaboration with the trade unions varies, even if it is roughly similar: if in Italy it is stronger and more structured (at least in some phases of the social dialogue), in Japan it is, overall, weaker at the national level (within large companies this problem does not exist as bargaining is coordinated internally). Confindustria and Keidanren interact with their closest interlocutors, marginalising where possible the others (while CGIL is more difficult to exclude, in Japan the main, if not only, representative for labour is always Rengō). Migration policies are no exception: both Confindustria and Keidanren move in the same direction pursuing the same goals, even using the same rhetoric. Individual initiatives, as in the case of Confindustria with the 2016 protocols between

Confindustria and the Ministry of the Interior (Confindustria Centro Studi 2016),²⁸⁶ or specific stances on the topic (Keidanren 2018), do not change the fundamental ideological structure of employer representation, which is linked to traditional patterns of capital's behaviour towards migrant workers and migration policies.

The trade union position is more complex, structured and differentiated not only on the basis of differences in the political-economic characteristics of the two countries and the peculiarities of their respective market economies but also on other social components. Trade unions power resources in the two countries vary in the interactions between economic actors (quantitatively and qualitatively), in the forms of institutionalised access to policy-making, in the types of consultation between the social partners (the "*concertazione* vs. advisory councils" already mentioned in the previous chapter), in the relations between different confederations, categories (between confederations and within a single confederation) and individual unions, and finally in the socio-political-economic role recognised to them in their respective societies. This last point is fundamental. The perception of the role of trade unions in Italy is greater than in Japan, as are their actual political competences and social roles in industrial relations. The very nature of the Italian trade union differs in forms of "combativeness" that are much more pronounced than in Japan, for example in the ability to mobilise workers to strike (Watanabe 2014: 125), with specific exceptions that are extremely sector specific or specialised (as in the Tōzen Union example). As a result, the political power in the two contexts turns out to be as different as are other economic and social factors. The internal conflicts and paradoxes of the trade unions are more evident than ever on the issue of migrant workers and migration policies. The political and ideological differentiation underlying Italian and Japanese trade unions,²⁸⁷ although less strong than in the past, is not enough to avoid the "short circuits" between a defined political orientation on the issue and a need to avoid conflict with their grassroots members (Della Puppa 2018). If these potential conflicts in Italy are mitigated by the choice to belong to a specific trade union (interview with CGIL Veneto 2020 and INCA CGIL 2022),²⁸⁸ in Japan the issue is less relevant (in addition to the fact that the enterprise

²⁸⁶ They have not been implemented, yet.

²⁸⁷ The political orientation of CGIL, CISL and UIL can therefore be said to be well defined, and consequently the grassroots militancy can also be politically close to their positions (although this is weaker than in the past); Rengō, Zenrōren and Zenrōkyō are also strongly politically oriented (pro-business, close to the Japan Communist Party and the Japan - former - Socialist Party respectively). The major difference is that while the three main Italian confederations have relatively wide access to forms of regulated dialogue and political-economic bargaining with the state, the Japanese confederations, with the exception of Rengō, have almost no institutionalised mechanisms of access to labour policy-making (Watanabe 2014: 20).

²⁸⁸ This mechanism, too, depends on many factors, such as geographical area, personal political orientation (e.g. CGIL members in Veneto and League political militants), labour category, etc.

unions system limits this kind of decision), and therefore less definitional for the worker to belong to a specific trade union.

These frictional problems are also determined by the fact that Italy has large differences in regional economic and labour market performance, with an economically efficient North and part of the Centre and a still productively weak South. These differentiations have led to a diversified stance by regional (and local) trade unions and the relations with their grassroots membership. However, the strong centralisation of the major confederations limited this idiosyncratic mechanism, especially in policy decision-making. Regional differences are present in Japan too, especially since the late 1980s (Watanabe 2014: 10-12), though unions do not have the centralised features of the Italian system and therefore do not have to "fight" in the same way to counter the same internal conflict dynamics.

The state, although not present as an interviewed subject in the empirical part of the thesis, sets the framework for relations between the other socio-economic actors. Again, if the political similarities were strongly comparable until the 1990s, the distinct transformations that both countries experienced in those years resulted in two very different socio-political realities. The continuous turnover of Italian governments between majority political parties with different positions towards labour created alternate moments of beneficial interactions (even if not always a tendentially left-wing majority government proved complacent with labour and trade unions demands). The almost total immobility of Japanese politics, which has been constantly oriented towards conservative pro-capital positions, has determined an impressive political-economic continuity, as well as constituted an immovable relational context and often tended towards primarily the needs of employers and big business. It is precisely these needs, in terms of migration policies, that have influenced changes considered unlikely during the country's contemporary history. If from this point of view, Italy cannot be compared to Japan, being in a totally different geographical area and characterised by distinct migratory flows, it is Japan that is featuring a transformative top-down process, desired by politics and business alike. Apart from the slowdown caused by Covid-19, Japan's political and economic transformations are part of what the country has stubbornly opposed to becoming for decades. These changes did not start in the last few years, as they had already been taking place since at least the 1990s,²⁸⁹ though only now have they become substantially visible.

²⁸⁹ For example, with the 1989 ICRRRA amendment (Brody 2002; Douglass 2003; Weiner 2003; Shipper 2008), labour market liberalisations and deregulations (Watanabe 2014; 2015a; 2015b; 2018), privatisations of public enterprises (Tamamura 2002), etc.

Globalisation is another variable that, although not explicitly mentioned during the interviews (at least not in depth), permeates the actions and choices of all the economic actors examined. Globalisation not only underlies the political-economic mechanisms operating in the two countries but also determines their transformative potential, be it political, economic or social. Migration policies, in the light of the needs of the labour market, are no less important as they are a direct consequence of the processes already in motion. Although the focus of the interviews was mainly on Japan, the transformative potential involving Italy should not be underestimated. The structural and economic needs are similar, as are the broader transformative dynamics. The competitiveness of SMEs in both countries is being put to the test, and economic policy choices are crucial to meeting the challenges of globalisation and international economic competition. Transformations are thus taking place also in Italy and, although not addressed in the course of the dissertation, are recognised by the institutional socio-economic actors interviewed (interview with INCA CGIL 2022). In a continuously changing framework, also due to powerful external shocks (first the financial crisis of 2008 and now the Covid-19 pandemic), the risk is of a downward transformative dynamic, which if not addressed systematically, e.g. with effective and efficient domestic industrial policies, can further exacerbate the segmentation of the labour market and lower the conditions of all workers in the lower strata, Italians and non-Italians alike.

The approach to the issue of migration is the most interesting one for this study. Basically, as already mentioned, capital aims at its own political-economic interests. Confindustria and Keidanren both have a good affinity with their governments, especially the latter. The need to lower production costs is sought in different ways, according to the particular market structure and institutional configuration of both countries. If in the Italian productive system the presence of flexible, low cost and low skills migrant labour force is structural in some specific sectors, in the Japanese case it is not yet, though the political dynamics of recent years indicate a slow shift to this political-economic feature. Japan can no longer make up for its structural economic problems with the help of its under-utilised workforce, namely women and the elderly. The neoliberal dynamics are the inevitable trigger to the need to go beyond the defined canons of the Japanese labour market and its classical employment relations system. What Confindustria and Keidanren are doing in this regard is essentially the same, i.e. acting for the benefit of the firms they represent (especially large firms), without forgetting the general necessities of the national labour market. Their relationship with the government goes hand in hand, in a well-defined lobbying activity with precise objectives. Their relationship with labour, in particular with the trade union confederations, varies substantially according to the interlocutor, even if its choice varies according to the situation or the position of

strength of the latter. While in Italy these relations may be more conflictual (although not with all the confederations, especially the CISL), in Japan the problem is hardly posed as the only recognised trade union representation in the trilateral dialogue is Rengō, which is notoriously pro-business.

Trade unions in Italy and Japan, on the other hand, are similar in their demands for workers. The "mission" for universal labour protection is present in both countries, but it is clearly more developed in Italy than in Japan. Although Zenrōren may be close to the ideology of CGIL, its historicity and political weight do not place it at the same level of socio-political importance. It is therefore not surprising that there is a marked distance between the situation and the possibilities of trade union action between the two countries. What does stand out, however, is their different orientation towards the protection of native workers and a veiled hostility to the liberalisation of migration policies. Japan, through Rengō, shows an almost obsolete behaviour compared to western trade union movements, including the Italian one. The defence of the domestic workers clearly has the upper hand over universalist protection of labour, at least as far as the main trade union actor in Japanese industrial relations is concerned. Moreover, despite the fact that Italian and Japanese trade union confederations are, overall, comparable and the same high presence of SMEs in their domestic production fabric presents the same criticalities, the still prevailing structure of Japanese enterprise unions hinders the possibility of a united movement and equal strength demonstrative actions compared to those in Italy. This is also reflected in migration policies. In Italy, although dependent on the political positions of the various governments, trade unions have been usually involved in the political dialogue concerning migration policies according to the needs of the labour market. In Japan, even though this can be done through Rengō, its general positions and the exclusion of other trade union actors leaves little room for political discussion. However, since the Japanese economic needs are now similar to the Italian ones, at least in some specific areas of the labour market, even the socio-economic arrangements between the government (LDP), Keidanren and Rengō aim at the controlled liberalisation of migration policies, not unlike the "quotas" negotiated in Italy.

The state, on the other hand, presents an important difference: it is almost unchanged in its political orientation in Japan, while in Italy it is quite variable. Even in this case, however, economic needs are decisive for the formulation and implementation of well-defined migration policy choices. In this sense, the Japanese case is emblematic of how, in spite of the atavistic recalcitrance to the liberalisation of migration policies, in spite of semi-hidden policy actions in

favour of opening up to specific categories of workers since the early 1990s, it has "bent" to domestic market logics and international economic pressures.

The analytical synthesis can be outlined as follows: although Italy and Japan belong to different market economies, their political and economic choices are not so dissimilar. In particular, the industrial relations actors face the same economic (and demographic) difficulties and must safeguard the same interests. The pre-existing structural framework and institutional configuration diversify their mechanisms and outcomes, but the different socio-economic dynamics are becoming increasingly comparable. In both countries, the economic-productive needs are to cut production costs in order to meet the challenges of the globalised economy. If one of the characteristics of the Italian labour market to keep costs down is the employment of low-cost and low-skill foreign workers, Japan is, in its own peculiar way, transforming its ethno-exclusive principles into a greater openness to the entry of a migrant labour force. The segmentation of the two labour markets has the same potential and needs. In particular, the lower levels need more labour flexibility and reduced production costs. Japanese education, although different to that of Italy, can no longer provide such resources to be employed in the low added value manufacturing sectors. The 2018 ICRA amendment, clearly, moves to partially solve all these issues. The amendment itself and its consequences, although approached differently by business and labour, are seen as a necessary field of urgent discussion because the issues discussed so far are considered real and serious by all domestic socio-economic actors.

Based on the interviews, is it possible to define whether it makes sense to compare Italy and Japan on these issues? Are structural and all other similarities sufficient to go further and evaluate possible systemic transformative processes? Does it make sense to assess the broader migration context of the two countries and the political and economic decisions on this issue? The answer to these questions is not simple and probably not obtainable from this work. However, it is possible to focus on some of these questions by further summarising the observations on what has been analysed so far, also from a more personal perspective.

3.7. Conclusion

Throughout its contemporary history, Japan has shown a distinct resistance to migration. Nonetheless, over the last three decades, Japan has opened its door "wider and wider" (Liu-Farrer 2020: 2-4), and this trend does not seem to be stopping. Just as it is not expected to curb the

demographic issues plaguing the country, as well as the resulting labour shortage in the domestic labour market.

However, at the same time, the Covid-19 pandemic has been an "immobility multiplier" to migration flows in Japan. Not only has it created new barriers and the potential for double internal (and external) differentiation between Japanese and non-Japanese, but it has also halted the (slight) ongoing transformations related to migration policies according to the needs of the domestic labour market. The Covid-19 pandemic limited the effectiveness of *Tokutei Ginō Ichi Gō* (Specified Skilled Type 1) and totally halted the activation of the *Tokutei Ginō Ni Gō* (Specified Skilled Type 2) visa programmes. While the first two years of the *Tokutei Ginō* visa programme had a steady, albeit slow, increase in the presence of medium- and low-skilled foreign workers, the pandemic undoubtedly limited their growth in numbers. An official of Japan's Immigration Services Agency said that "*the program is steadily taking root, but the pandemic has caused an unexpected halt to international travel, which has impacted the number of foreign workers accepted*" (The Yomiuri Shimbun 2021). The impact of Covid-19 did not only affect the number of acceptances regarding the two new residency statuses, but the overall number of foreign residents present in Japan dropped for the first time in eight years (Immigration Services Agency, Ministry of Justice of Japan 2021; Nippon.com 2021). There is no doubt that the severe global health emergency, coupled with the particularly restrictive measures related to border restrictions in the Japanese archipelago,²⁹⁰ has not helped as regards better development of the innovations introduced with the 2018 ICRR revision, just as they have not allowed a continuation of the processes of transformation of migration policies and the labour market. What Vogt (2009) had identified as "an invisible policy shift" in reference to the EPA accords for internationalisation of healthcare migration (Vogt 2009), apparently possible also in a broader transformation of domestic migration policies as a function (and parallel mechanism) of the entire labour market, no longer seems to be possible.

The Japanese economy is going through one of the worst times in its recent history. After the 2008 global financial crisis and the 2011 Great East Japan Earthquake, Japan's current economic phase finds itself in a negative downturn due to Covid-19. The Ministry of Health, Labour and Welfare (MHLW) stated in its March 2020 report that "*The Japanese economy is in a severe situation, extremely depressed by the Novel Coronavirus*", and then in April it added that "*The Japanese economy is getting worse rapidly in an extremely severe situation, due to the Novel Coronavirus*" (MHLW 2020). However, the Covid-19 pandemic can simply be seen as a phase, which although it may have extremely relevant implications for the economic, social and political

²⁹⁰ For more on the issue of Japanese border restrictions and Covid-19, see Costalunga 2021.

future of the country (and all countries), has only slowed down a process that was already underway. Furthermore, contrary to the common assessment based on economic competitiveness in comparison to its Asian neighbours (found in several interviews), Japan still appears to be a desirable destination, offering numerous job and career opportunities, educational options, as well as personal economic (and standard of living) upgrades, in a particularly safe social environment (Liu-Farrer 2020: 24-25). Not to mention that the archipelago commands intrinsic regional importance that is still quite relevant. Despite no longer being the world's second-largest economy since 2010, Japan remains a political and economic point of reference for the entire Asian macro-region.²⁹¹ Indeed, migration processes are cumulative (Liu-Farrer 2020: 38). Japanese business investment involves the entire Asian region. As a result, there are numerous channels and social networks that facilitate transnational movement (Massey *et al.* 1993), in this case directed towards Japan. By the presence of such a pre-existing context, these processes underlie today's migration mechanisms and economic pull factors of the Japanese labour market.

Japan seems to have an ongoing ambivalence, if not open hostility, towards change. This is accentuated on the issue of increasing the presence of foreign workers in its labour market. The general anxiety that they will alter, or even destroy, Japanese social harmony is in line with apprehension present in all societies towards the risk of loss of national cultural identity and disruption of the domestic social order due to migration (Sniderman *et al.* 2004; Sides, Citrin 2007; Card *et al.* 2012). The language barrier, a recurring theme in almost every interview, reinforces the perception of this social danger by creating an almost impenetrable cultural barrier between the *uchi* and *soto* (even for highly skilled workers).²⁹² The Japanese language is considered by Japanese people a difficult language to learn, complex to assimilate linguistically and culturally. This difficulty is an additional divisive element, a variable considered, and accentuated, by Japanese and non-Japanese alike (Liu-Farrer 2020: 201). However, as much as the hostility, which is seemingly deep-rooted in Japanese society, and politics towards the liberalisation of foreign labour (and change in general), these socio-cultural complexities have not put a stop to the presence and arrival of new foreign workers. Nor have the demands of the labour market, inevitable for domestic economic sustainability (Liu-Farrer 2020: 203), or the creation of new residency statuses (Hamaguchi 2019a).

²⁹¹ Japanese appears to be a widely taught language in East Asia. This is due to both the political and economic importance of the country, but also the colonial legacies that bind Japan to the other countries in this geographical area (China, South Korea, Taiwan, etc.) (Liu-Farrer 2020: 38).

²⁹² This element should be considered in addition to the low use (and knowledge) of English in Japan (Liu-Farrer 2020: 201).

What is clear from these interviews is that Japan has slowed down its transformative process. At this point in time, it has almost stalled though the structural demographic and economic dynamics have not stopped and continue in their process of change. Japan's industrial relations actors are fully aware of this transition, despite approaching the problem from different (ideological) angles. Italian transformative processes are also underway, but they do not have the revolutionary force of what is happening in Japan. It is, in fact, Japan which, after decades of (not always) winning economic peculiarities, is chasing different political-economic systems and the structural trends bring this country closer to Mediterranean countries, particularly Italy. According to the interviews, Japan is not transforming itself into an MME, nor is it considering a radical political change in migration policies in relation to labour market demands. At the same time, "silently" and hardly noticed, it is continuing along a path initially traced out as early as the end of the 1980s, that is a translational mechanism towards more liberalised economic systems, from its labour market and industrial relations principles to the admission of new foreign labour. It remains to be seen whether this will be just an act destined to stall or will result in an, albeit slow, systemic political-economic transformation of the country. These analyses lead to the conclusions of this research, which will be developed in the subsequent section of the dissertation.

4. Conclusions

The overall purpose of this doctoral thesis has been precisely to answer the question about the possibilities of convergence between Italy and Japan, in particular about the dynamics concerning Japanese migration policies according to the needs of domestic and international labour markets. However, this was not the only goal. This research project, carried out over the last three years, has focussed on a broader exploration of the political, social and economic systems of Italy and Japan, on the possibility of comparing the two countries and on the prospects that such a comparison could offer. There were numerous discussions with various professors who were experts in the different areas covered by this work (as well as various institutions, such as trade unions and associations). At the end of each conversation, usually the main question was always whether this comparison really made sense or not. The responses were varied, but none denied the possibility of (some sort) of comparison, albeit at different analytical levels. This last question stems from the doubt whether it would be possible to study these diversified phenomena, which are extremely complex when taken individually, by intertwining different strands of literature that are greatly different and sometimes very distant from each other. This question was conceived posthumously to the formulation of the other two, which was determined, almost as a structural necessity in the course of the research work, by the limitations posed by the Covid-19 pandemic.

To argue my study proposal and achieve my research goals, I articulated the dissertation into three main chapters: the first two are focussed on the theoretical analysis of the various topics covered in it, whereas the third is a more empirically oriented chapter. While these three chapters were initially intended to possess a quantitative and formal balance between the parts, the problems dictated by the impossibility of travelling abroad (or even within Italy) and conducting much of the empirical investigation, necessitated a major reorganisation of the internal proportions of the dissertation. As this was originally a research project designed with the aim of proposing empirical research consisting of a series of qualitative in-depth interviews, the outbreak of the pandemic almost at the beginning of the work led to the necessity to give greater importance to the theoretical parts, interweaving the literature in a potentially innovative way and focusing more on critical reasoning. This choice also shifted the centre of gravity of the originality of this thesis, from field research on issues that had been little addressed up to this point (particularly in the choice of countries of comparison), to the search for comparison on areas of the literature that have so far been little confronted and critically intertwined with each other. The focus, in the end, remained on

Italy and Japan, although the comparison is not a classic 50/50 analysis between the two subjects of study. Japan has been analysed through a comparative perspective with the Italian case, the latter being seen as a *de facto* "benchmark" for potential transformations.

In the first chapter of the dissertation, preliminary notions of the topics covered in the thesis are presented, together with an extensive literature review of the research main themes. First of all, an attempt is made to justify the reasons for comparing Italy and Japan, their principal similarities and the most evident differences. The central focus of the first part of the chapter is the introduction of the VoC perspective, the fulcrum of this comparative analysis. This chapter also introduces a first descriptive analysis of the social, political and economic characteristics of the two countries, a depiction of the features of their welfare states and welfare production regimes, the concept of convergence and the variable of migrant labour. Although this is a purposely introductory chapter, it lays the groundwork for comparative analysis and introduces issues rarely intertwined in the different areas of literature.

The second chapter is conceptually divided into three parts, distinct from each other but causally linked in the overall thread of the analysis. The first part deals with the topics of migration and migrant workers. After a brief introduction of the main migration patterns and concepts revolving around the term "migrant", the VoC approach is used to describe how the different institutional configurations and industrial relations actors determine types of migratory flows and peculiar migration policies. The first part continues with a more in-depth analysis of the Italian and Japanese contexts, their specificities and the distinctive solutions adopted with respect to these issues. The section concludes with data on migrants in Italy and Japan and a brief overview of the history of migration policies in the two countries. The second part of the chapter deals with industrial relations and the role of the main institutional socio-economic actors in relation to the issue of migrant workers and national migration policies. The role of government, trade unions and employers' associations regarding the specificities of the two countries is then presented. The third part deepens the theme of the convergence hypothesis, comparing the VoC approach with the VoNeoliberalism perspective, as well as exploring the concepts of globalisation and neoliberalism. The conclusion of the chapter methodologically introduces the next one.

The third and last chapter of the dissertation is instead more empirically designed, as it contains the interviews conducted in Italy and Japan. The first part presents an initial analysis of the relationship between labour migration and institutional socio-economic actors, while the central part of the chapter provides a description of the interviews, the different points discussed during them and information about the institutional actors involved. The chapter concludes with an in-depth

analysis of the results obtained from the interviews, especially those concerning Japan as the real core of the analysis concerning the research questions. The final section deals with the similarities and differences between institutional socio-economic actors within and between the two countries.

The VoC perspective helped the whole analysis and at the same time served as its analytical framework by setting the limits of comparison and transformative assumptions. The thesis tried to find answers to the research questions through the examination of the existing literature and the analysis of the empirical study involving the main Italian and Japanese industrial relations actors. The former helped to create the analytical and comparative context, the latter to achieve part of the research objectives. While initially the assumptions were, almost simplistically, towards an inevitable structural convergence (as envisaged, for example, by the VoNeoliberalism approach), in the course of the research the predictions were almost completely reversed (as featured by the VoC perspective). Ultimately, the main empirical findings are closer to the latter hypothesis. Japan, however, has to confront the inevitable transformative drives and issues induced by globalisation and overall neoliberalist inputs, as it is not entirely restricted by the limits of its domestic market demands. Thus, although the processes of transformation are slow and almost imperceptible, and despite Japan being bound by an exclusionary socio-cultural system that is reluctant to engage in a more generalised structural change, the various economic drives (internal and external ones) are gradually bringing to the surface a transformative mechanism that was barely hinted at in previous decades. This dynamic is increasingly evident in migration-related political choices of recent years, the latest of which is the 2018 ICRRA amendment.

In a broader sense, the research results, contrary to initial expectations, have almost completely refuted the hypothesis of a forthcoming transformation within the Japanese labour market, without, however, denying the structural necessity for a new flexible, low-cost and low-skilled workforce. It is the scope and the (perceived) need for a further liberalising push in migration policies that are still limited. If a transformation, and eventual systemic convergence, is taking place, it is happening at an almost imperceptible speed, out of sight (and interest) of Japan's major institutional socio-economic actors.

The comparison between Italy and Japan was fairly optimal for assessing possible transformative trajectories, as the initial assumptions about the similarities between the two countries proved to be very strong. Despite the lack of knowledge of the socio-economic actors interviewed on the subject, the similarities were evident to all. The real challenge was to make sense of the analysis in the light of the equally obvious differences. The comparability of demographic dynamics turned out to be only the tip of the iceberg compared to a series of more or less

"accidental" similarities that bring Italian and Japanese social, political and economic areas and events closer together. If the starting point of these analogies is the defeat in the Second World War and the disastrous economic-productive situation of the time, industrial reconstruction led to different solutions in an extremely similar political context. The history of the DC and the LDP, until at least the 1990s, was parallel to the development of a social system with potentially comparable values, as well as the similar social dynamics of family, employment and (consequently) welfare structure. The social role of the family, particularly of women, brings Japan to recall the Southern European social patterns system. Nonetheless is the productive fabric of the two countries, which, despite differences in production styles and manufacturing focus, has revolved around the importance of SMEs, industrial districts and regional differentiation as their productive and competitive arrangements at the national and international level. The added value was their productive dynamism and flexibility, though it was sought in different ways.

In fact, the most interesting differentiation is how productive and economic development was antithetically achieved in the two countries. In particular, Japan, unlike most of the other OECD countries, chose the practical ideology of utilising only its indigenous labour force, while Italy made great use of foreign labour. In light of the strong segmentation of both labour markets, the Japanese decision was considered particularly bold by international observers. However, even this peculiarity clashed with an economic reality framed by the neo-liberal pressures of the international markets, which, especially since the 1990s, made the Tōkyō government look for a series of "ethnic-political" solutions that would act as a compromise between the economic needs of the market and the political orientation in the name of the preservation of the "Japaneseness". While this attempt to diverge from the political-economic solutions adopted by the other advanced economy countries held up for a few decades, it came to a recent (official) halt in 2018. Therefore, this could have been the starting point (or a further sign) of convergence towards a potentially comparable system such as the Italian (or the Mediterranean) one, which is similar in many structural (and other) features.

What differentiates Japan the most from other countries, however, is the awareness of change. While institutional socio-economic actors such as trade union confederations are the first to be involved in broader policy-making mechanisms related to the labour market and the social interests of workers, in Japan seems that the main labour representatives are not fully aware of (or interested in) more wide-ranging (international) transformations affecting domestic socio-economic dynamics. This is the case of migrant labour. The significance of the issue of the presence of migrant workers and the awareness of this phenomenon is different in the two countries. In Italy,

particularly since the 2000s, the EU enlargements have created a shift in trade union power resources, where transnational mobility and permanent (or temporary) international labour has further altered the long-term socio-economic framework. This transformation did not happen in Japan, except partially and in an almost unnoticeable way with the first official opening to the *nikkeijin*, even without having a crucial impact on national concerted political mechanisms. The Italian strategies of capital and labour have changed through time, especially union confederations that have had to cope with an increasing crisis of representation, adapting no longer to the protection of native workers' interests only but also involving migrant labour at different organisational levels. Japanese unions have not changed, except for greater awareness of these issues in unions and confederations that are not directly involved in the national tripartite dialogue. Rengō has never modified his pro-government and Keidanren-friendly stance, while the three main Italian confederations have had to (and had the possibility to) give different interpretations to the migration and economic phenomena, with an overall stronger involvement in domestic policy-making.

The lack of awareness (or alleged lack of awareness) of the Japanese labour side is therefore not generalised but is weak where it counts. Is this fact destined to remain unchanged? If from the interviews it would seem so, it is not to be excluded that the possible transformation of the socio-economic fabric, in accordance with a greater presence of foreign labour within the archipelago, could lead to a different social consciousness and redirect unions to new political strategies more focussed on the needs of Japanese and non-Japanese labour alike. Instead, the government and capital seem to be moving towards a precise course of action, i.e. of constant "controlled" liberalisation, as happens in other advanced economy countries (and in Italy, too). The latest changes at the top of the Japanese government (from Abe to Suga, and now to Kishida), clearly do not change in any way the LDP's political stance on these issues, except for possible political recalibrations forced by the Covid-19 pandemic.

The interviews, too, helped as a research strategy to understand how the socio-economic actors interviewed, operating in different institutional contexts but with similar political aptitude, implemented different strategies and acted dissimilarly (or similarly) to common problems. This analysis demonstrated how all the actors involved do not have passive roles in the issues examined, but interact with each other at different institutional levels and look after common interests. Each of them, in their strategic planning and on behalf of their representative interests, adopts the political and lobbying strategies deemed most appropriate, trying to move and operate in the environment most congenial to them (or politically granted from above). However, from an analytical point of

view, these considerations suffer from the limited number of actors interviewed. The interviewees' pool could be wider, and it is not excluded that further nuances might have come to light. The research material is limited in scope compared to a potentially more elaborate general framework and does not allow definitive conclusions to be drawn either on the strategies of the actors or their real "shaping" power in the face of the structural transformations taking place. Even though it was made clear in the course of the interviews what were their aims and strategies for each issue discussed, it is still partially unclear whether they were deeply structured plans or sporadic actions dictated by the urgency of the issue or the moment.

What is interesting, however, are the results obtained from the study of the different phenomena addressed throughout the three chapters. Given their complexity, it was decided to intertwine very different strands of literature. The two countries compared, Italy and Japan, are a potential novelty for comparative research, as they are generally kept separate or analysed only on a narrow basis. The VoC approach, first of all, puts Italy in the MME cluster and Japan in the CME one, determining a first theoretical division. The political-economic solutions to obtain their comparative advantages are different, as are their socio-economic contexts. However, by cross-referencing welfare systems, their labour market characteristics and necessities (SMEs' demands, market segmentation, educational system, etc.), demographic trends and socio-cultural structures (low birth rate, ageing population, shrinking working-age population, the role of the family and women, etc.), it was possible to include in the analysis also the theme of labour migration. To obtain a more articulated picture, it was necessary to use industrial relations theory in order to understand how socio-economic institutional actors operate within each political-economic framework in relation to migration policies and foreign labour issues. By analysing and interweaving all these topics it was possible to comprehend how Italy and Japan differed on the presence of migrant workers, as well as to understand what prevented Japan from making other kinds of political-economic choices despite similar economic needs and comparable external frames (globalisation, neo-liberal pressure). It was thus possible to understand how Italy and Japan maintained their different comparative and competitive advantages despite similar productive necessities and structural dynamics, while at the same time it was possible to catch a glimpse of why Japan required, in the end, to change its "granitic" stance on labour migration policy.

Within the Japanese side of the discussion, other considerations are equally interesting. Despite the fact that in recent years foreign residents have exceeded 2% of Japan's total population, and since their number is destined to increase further in light of the structural problems already explained, the LDP has continued to maintain a negative attitude toward migration policies, limited

to recognising migrants as a temporary workforce or, at most, as mere tourists. The distinctions made among migrants have been purely skill-based, without a deeper evaluation of the no longer transitory essence of migrations and of the needs of the domestic labour market that have become structural. This has been further amplified by Covid-19 and the border policies implemented by the Tōkyō government, including the very strict "Japan Entry Ban" that has repeatedly denied entry to tourists, foreign students and also foreign residents (even permanent ones) (Costalunga 2021; Penn 2022). This created a further obstacle to change, which is unavoidable due to the economic needs of the country, and provided a further variable of differentiation and friction related to the *uchi* and *soto* cultural factors. The consequences of these political choices, far from being able to bend the current economic dynamics, may however be affecting negatively a legacy that Japan has just started to build and which is crucial to avoid those problems that, in the opinion of the Japanese socio-economic actors interviewed, would lead to the social backlash experienced by Western countries on migration issues.

Ultimately, many considerations can be made at the end of this work. Can Italy and Japan be compared? To this question I think the answer is yes, they can be compared. Despite the differences, the elements of similarity offer possibilities for criticism and analysis that go beyond mere geographical distance, obvious cultural differences or the fact of belonging to different political-economic configurations. There is plenty of food for thought. It is only necessary to avoid being limited by the initial analytical difficulties that arise almost spontaneously by the presence of profound differences or the scarce literature on the subject. Does it, therefore, make sense to study complex phenomena affecting different social, political, economic and cultural areas of Italian and Japanese societies by intertwining strands of such different literature? Again, the answer remains affirmative. Not only it is possible to compare different areas of these two countries, as per the initial hypothesis, but through an interdisciplinary approach such a comparison has extremely interesting potential. It should not be underestimated how the VoC approach can interact with the welfare regime models, labour migration theory and even cultural studies. In the Japanese case, they have provided a unique, causal and not obvious framework. It is surprising, in my personal view, how little interest has so far been paid to the incredible similarities between Italy and Japan, as well as how little comparative analysis has been undertaken from different strands of literature. However, it is not enough to stop at the initial astonishment that interlocutors offer when faced with the unexpected similarities between Italy and Japan. It is necessary to continue the research systematically, even risking running into "dead ends" and ideas that may indeed prove to be fallacious.

To the question about the possibility of convergence of Japanese migration policies towards a political-economic system more similar to the Italian one with respect to labour market needs, the answer is, as already expressed during the conclusion to chapter three, probably not. At least not in an evident way and not in the immediate future. The significance of this finding is definitely interesting, at least for the present of the Japanese migration framework. The socio-economic institutional actors involved in the domestic political discussion, in particular those actively participating in political-economic policy-making, do not see this possibility. Those in a broader institutional "orbit" foresee it but do not assess it as imminent. They probably perceive it as inevitable, but not in the short term. Those who enthusiastically see a wider structural convergence, or at least an opening of Japan towards a liberalisation (also) of migration policies and a consequent standardisation of the socio-economic situation of migrant workers (but also of every foreign citizen), will necessarily have to wait further. What is Italy's role in all this? Can it be a "benchmark" for Japan and show potential guidelines for change, dictating, through its history, political events and the political-economic management of the labour market, an idea of what could be? Probably also in this case the answer is negative, as there is not (sufficient) interest on both sides to explore events and solutions that go beyond the autarchic barrier of their sphere of competence and influence. It is therefore not a question of assessing the present, but possibly of waiting and slowly observing as socio-political-economic changes take their course based on the unique features that characterise each political, economic and even cultural system. It should not be overlooked that the Italian socio-economic framework is changing, too. Not least because of the external shock caused by the Covid-19 pandemic. This makes it complex to foresee whether the internal transformations in Italy may in turn be a further convergence mechanism or yet another highlighting of the comparative advantages of both countries in dealing with economic difficulties.

Italy, too, faces similar dynamics to Japan, albeit in a different geographical (Southern Europe, Schengen area) and legal (European Union) context. The need for low- and medium-skilled workers is perceived to be urgent also in Italy, despite its chronic high unemployment rate. The economic pressures of the labour market are subjected to and diverted by weak management of the phenomenon, in which governments (which change rapidly) and the demands of capital are poorly coordinated. So the state, which coordinates tripartite relations with labour and capital, *"abdicates its role as a natural regulator of the encounter between supply and demand for foreign labour, to the advantage of criminal organisations, ready, in times of prohibitionism, to provide a remunerative replacement; exacerbating social conflict, because irregular arrivals fuel illegal work, exploitation, social dumping, degradation in the areas where irregular immigrants settle and*

the creation of reserve pockets for crime; impoverishing itself and the Italian taxpayers, who are called to finance costly policies to fight illegal immigration and to 'incapacitate' those irregular migrants who would also be necessary; resigning itself to an inexorable demographic and welfare system decline, difficult to contain without labour immigration" (Savino 2022: 4-5).²⁹³ Basically, Italy experiences similar paradoxes to those in Japan, where demographic issues and the economic needs of the labour market, and more specifically of employers, do not reflect the real political actions of governments. This political-economic reality creates a mismatch, in both countries, between labour demand and the possibility of entering the (foreign) labour force, which is strongly conditioned by governments that are extremely variable (Italy) or consistently conservative (Japan).

At this point, all that remains is to express my hypothesis for what might happen. In particular, what can be deduced about Japan's future concerning greater liberalisation of migration policies? It seems redundant to specify that these migration policies are aimed at the needs of the labour market as the Tōkyō government has never changed its view of foreigners just as a useful "tool" for the productive needs of the country. There is no alternative to this principle at the moment. The real change could probably come from below, from a detachment of public opinion from the way the issue is presented and addressed by conservative (dominant) parties and major socio-economic institutional actors, who are politically akin to the former. Japan, after all, is not considered a country particularly sympathetic to migrant issues, just as it is not on the human rights topic. The 2020 report of Human Rights Watch stated that "*Japan has no law prohibiting racial, ethnic, or religious discrimination, or discrimination based on sexual orientation or gender identity. It accepts an extremely small number of refugees each year, mostly from Asia. Japan has no national human rights institutions"* (Human Rights Watch 2020). Almost nothing has changed in this year's report, despite Japan hosting the Tōkyō 2020 Olympic and Paralympic Games (Human Rights Watch 2022).

The 2018 ICRRRA amendment was merely a limited top-down expression of this potential change, without however possessing any kind of authentic shift potential from the utilitarian logic applied by the LDP government so far. Added to this situation was the serious problem of Covid-19. While in the first two years of the enactment of the *tokutei ginō* there was a steady, albeit slow, increase in the presence of medium and low-skilled foreign workers, the pandemic undoubtedly limited their quantitative growth. In the words of an agency head of the Japan Immigration Services Agency, "*The programme is taking root steadily, but the pandemic has caused an unexpected halt in international travel, which has had an impact on the number of foreign workers accepted"* (The

²⁹³ Author's own translation.

Yomiuri Shimbun 2021). The impact of Covid-19 not only affected the number of acceptances of the two new residency statuses, but the overall number of foreign residents in Japan dropped for the first time in eight years (Nippon.com 2021). There is no doubt that the severe global health emergency, coupled with the particularly restrictive measures related to border restrictions in the Japanese archipelago, did not help in the direction of better developing the innovations introduced with the 2018 ICRRA revision.

The novelties introduced in the 2018 ICRRA amendment are substantially overshadowed by the Japanese persistence in rejecting any changes within the migration perspective. Fragile changes such as the introduction of the two *tokutei ginō* do not help overcome the sharp division present between natives and immigrants in contemporary Japan, nor do the typical Japanese isolationist tendencies (Vogt 2013). And, while not dealing with absolute immobility, it seems singular how Japan faces the possibility of change with a unique slowness, unlike what is happening in countries such as South Korea, similar from many social and cultural points of view, though extremely distant in terms of multiculturalism and migration policies (Hurt 2014; Burgess 2020). Another interesting topic, not addressed in this dissertation, is the difficulty of political evolution in the country. The dominance of the LDP since the end of the Second World War (despite the continuous change of prime ministers) has led to an almost uninterrupted continuation of nationalist and conservative positions, which does not help a different approach to the migration issue. The left-wing parties, natural opposition to the LDP and political representative of universalist values, which are present in trade unions and union confederations that are not present in nationally recognised institutional dialogues, have not been able for decades, apart from the DPJ interlude of 2009-2012, to have any prominence in national politics. Japan's constant political conservatism and looking back to the past, however, are issues that would be interesting to discuss elsewhere.

So, ultimately, change, as reiterated by several interviewed socio-economic actors, is possible and probably is happening right now, though it also needs support from below. Top-down dynamics are not enough to be able to cope with such a relevant socio-cultural shift, whereas Japan has been almost dominated by a nationalist and conservative political imagination for the last seventy years. Just as a simple revision of the national migration law cannot erase the deep-rooted dynamics of differentiation and division between those who are members of the *uchi*, i.e. the Japanese, and those who are part of the *soto*, the non-Japanese. In all this, Italy is not maybe an example to directly follow, but even in this case, an organized dialogue between the main Italian and Japanese institutional actors could lead to unexpected implications and solutions, also for the structural, demographic and socio-economic problems that afflict both countries.

4.1. Epilogue

During the three years I have been working on this doctoral thesis, the global situation has drastically changed. Not only from a political-economic point of view, the mechanisms of which are often structurally variable due to internal and external shocks, but also from a broader perspective. Indeed, Covid-19 has disrupted the work of many researchers, including Ph.D. students just starting with their research work. The pandemic crisis also changed (in a negative way) my entire Ph.D. experience. The pandemic broke out at the beginning of my second year of doctoral studies, affecting my empirical work experience in Japan and forcing me to return to Italy. Since then, also due to the political choices of the Japanese government (from Abe to Suga, and now with Kishida), I have not been able to return to Japan to complete my research projects, including interviews and material collection. Contacts and interviews through digital communication platforms, which had been enhanced during the pandemic, did not prove up to the standard of qualitative research as originally conceived. As a result, the entire apparatus of the thesis slowly changed, seeking solutions to a situation that was at least complex in its dynamics. In Italy, unfortunately, things have not gone much better. The crisis has led to a generalised difficulty in communications and complications in social interaction, online and live, dictated by the transformation of the everyday life of the whole society. These problems have affected fundamental points in my entire work, from the research objects to the methodology applied for the dissertation. This determined the overall reorganisation of the structure of the chapters and the kind of originality sought by this research work.

Political and economic dynamics have also changed, as a natural consequence of the difficulties caused by the pandemic crisis. Huge setbacks to the various advanced (and not) economies, as well as strongly altered migration policies and migratory processes. This was the case in Italy, as it was even more evident in Japan. If Italy followed the example of the other European countries, closing itself off and limiting inter-regional movement with the other members of the European Community (as well as intra-national ones), Japan has even completely closed its borders to foreign citizens residing in the archipelago. This extremely severe (and internationally criticised) decision has prevented, on several levels, my return to Japan and the continuation of the fieldwork.

Generally, at the end of a long doctoral experience it is possible to make a synthesis of progressing work, while in my case (and I think of many other colleagues), I had to face a stop, a

series of slowdowns and jolts in the planning and finalisation of the work. In this specific case, Japan stopped the implementation of new migration policies, due to a changed socio-economic framework, banished to a "previous" political-economic step. This research project suffered the same fate. Nevertheless, the results obtained and the originality achieved in comparing two countries that have hardly been compared and intertwining together very different strands of literature to study equally complex phenomena should not be underestimated. All the more so if these strands and phenomena have rarely been interwoven before. The idea of a comparison between Italy and Japan was born before the proposal of the Ph.D. project, and it has undergone a series of significant changes. Thus, there are still many points that are potentially developable and that would be interesting to explore in the future. The topic of comparison between these two countries remains, in my opinion, still of extreme interest, and probably hides potentialities that have not yet been identified. My hope, with the improvement of the global situation related to the pandemic and a (re-)normalisation of research mechanisms, is that this work can continue, reaching the objectives initially set and, in the future, go even further.

References

- Adams, Roy J. (1988). Desperately seeking industrial relations theory. *International Journal of Comparative Labour Law and Industrial Relations* 4(1), 1-10.
- Afonso, Alexandre, Devitt, Camilla (2016). Comparative political economy and international migration. *Socio-Economic Review* 14(3), 591-613. <https://doi.org/10.1093/ser/mww026>.
- Aihara, Yasunobu (18 December, 2018). *Statement on approval of Immigration Control and Refugees Act amendment*. <http://www.jtuc-rengo.org/updates/index.cgi?mode=view&no=388&dir=2018/12>. (30/10/2021).
- Akimoto, Daisuke (12 March, 2021). *Japan's Changing Immigration and Refugee Policy*. The Diplomat. <https://thediplomat.com/2021/03/japans-changing-immigration-and-refugee-policy/>. (04/07/2021).
- Albert, Michel (1991). *Capitalisme contre capitalisme*. Paris: Éditions du Seuil.
- Alho, Rolle Julius (2015). Inclusion or Exclusion? Trade Union Strategies and Labor Migration. *Ph.D. thesis*. Institute of Migration, Turku.
- Amable, Bruno (2003). *The Diversity of Modern Capitalism*. Oxford: Oxford University Press. <https://doi.org/10.1093/019926113X.001.0001>.
- Amable, Bruno, Guillaud, Elvire, Palombarini, Stefano (2011). The political economy of neo-liberalism in Italy and France. *Documents de Travail du Centre d'Economie de la Sorbonne*. fhalshs-00639450.
- Amable, Bruno, Guillard, Elvire, Palombarini, Stefano (2012). *L'Économie Politique du Néolibéralisme: Le cas de la France et de l'Italie*. Paris: Editions Rue d'Ulm.
- Ambra, Maria Concetta, Carrieri, Domenico (2017). Welfare e Relazioni Industriali: un nuovo matrimonio? *Welfare aziendale tra dimensione organizzativa e cura della persona. Analisi di un percorso per creare un nuovo patto tra l'impresa e le persone* (ed. Maino, Franca). Milano: Este, 11-27.
- Ambrosini, Maurizio (2015). Irregular but Tolerated: Unauthorized Immigration, Elderly Care Recipients, and Invisible Welfare. *Migration Studies* 3(2), 199-216. <https://doi.org/10.1093/migration/mnu042>.
- Ambrosini, Maurizio (2020). *Sociologia delle migrazioni*. Bologna: Il Mulino (3rd edition).

- Ambrosini, Maurizio, De Luca, Deborah, Pozzi, Sonia (2016). *Sindacati multietnici. I diversi volti di un cammino in divenire*. Bergamo: Edizioni Junior.
- ANSA (5 October, 2017). *Italy trapped in low-skill equilibrium-OECD's Gurria*. ANSA.it. https://www.ansa.it/english/news/2017/10/05/italy-trapped-in-low-skill-equilibrium-oecds-gurria-2_4095e0ba-526c-4e64-9a26-6ea25694f803.html. (26/11/2021).
- Aoki, Masahiko (2000). *Information, Corporate Governance, and Institutional Diversity*. Oxford: Oxford University Press.
- Aoki, Masahiko (2010). *Corporations in Evolving Diversity: Cognition, Governance, and Institutional Rules*. Oxford: Oxford University Press. <http://dx.doi.org/10.1093/acprof:oso/9780199218530.001.0001>.
- Arango, Joaquin, Bonifazi, Corrado, Finotelli, Claudia, Peixoto, Joao Paulo, Sabino, Catarina, Strozza, Salvatore, Triandafyllidou, Anna (2009). The Making of an Immigration Model: Inflows, Impacts and Policies in Southern Europe, *IDEA Working Papers* 9.
- Arase, David (2010). Japan in 2009: A Historic Election Year. *Asian Survey* 50(1), 40-55. <https://doi.org/10.1525/as.2010.50.1.40>.
- Arudou Debito (2015). *Embedded Racism. Japan's Visible Minorities and Racial Discrimination*. London: Lexington Books.
- Aspalter, Christian (2011). The development of ideal-typical welfare regime theory. *International Social Work* 54(6), 735-750. <https://doi.org/10.1177/0020872810393765>.
- Babones, Salvatore J. (2005). The Country-Level Income Structure of the World-Economy. *Journal of World-Systems Research* 11(1), 29-55. <https://doi.org/10.5195/jwsr.2005.392>.
- Baccaro, Lucio, Carrieri, Mimmo, Damiano, Cesare (2003). The resurgence of the Italian confederal unions: Will it last? *European Journal of Industrial Relations* 9(1), 43-59. <https://doi.org/10.1177/0959680103009001450>.
- Baccaro, Lucio, Hamann, Kerstin, Turner, Lowell (2003). The politics of labour movement revitalization: The need for a revitalized perspective. *European Journal of Industrial Relations* 9(1), 119-133. <https://doi.org/10.1177/0959680103009001455>.
- Baccaro, Lucio, Howell, Chris (2017). *Trajectories of Neoliberal Transformation: European Industrial Relations Since the 1970s*. Cambridge: Cambridge University Press. <https://doi.org/10.1017/9781139088381>.
- Baldwin-Edwards, Martin (2002). Southern European Labour Markets and Immigration: A Structural and Functional Analysis. *Mediterranean Migration Observatory. MMO Working Paper No. 5*. Athens: MMO.

- Bamber, Greg J., Lansbury, Russell D., Wailes, Nick (2004). (eds.) *International and Comparative Employment Relations: Globalisation and the Developed Market Economies*. Crows Nest, NSW: Allen & Unwin (4th edition).
- Bamber, Greg J., Lansbury, Russell D., Wailes, Nick (2004). Introduction. *International and Comparative Employment Relations: Globalisation and the Developed Market Economies*. (eds. Bamber, Greg J., Lansbury, Russell D., Wailes, Nick) London: Sage, 1-35 (4th edition).
- Barbour, Rosaline (2007). *Introducing Qualitative Research. A Student's Guide to the Craft of Doing Qualitative Research*. Crows Nest, NSW: Allen & Unwin (4th edition).
- Barfield, Thomas (1998). *The Dictionary of Anthropology*. Maiden, MA: Wiley-Blackwell.
- Bartram, David (2000). Japan and Labor Migration: Theoretical and Methodological Implications of Negative Cases. *International Migration Review* 34(1), 5-32. <https://doi.org/10.1177/019791830003400101>.
- Basso, Pietro (2004). Sul rapporto tra immigrati e sindacati. *Diversity management e società multiculturale* (eds. Mauri, Luigi, Visconti, Luca). Milano: Franco Angeli, 113-131.
- Basso, Pietro, Perocco, Fabio (2000). (eds.) *Immigrazione e Trasformazione della Società*. Milan: Franco Angeli.
- Bechter, Barbara, Brandl, Bernd, Meardi, Guglielmo (2012). "Sectors or Countries? Typologies and Levels of Analysis in Comparative Industrial Relations". *European Journal of Industrial Relations* 18(3), 185-202. <https://doi.org/10.1177/0959680112452691>.
- Beck, Ulrich (2000). *What Is Globalization?* Cambridge: Polity Press.
- Becker, Uwe (2007). Open systemness and contested reference frames and change: a reformulation of the varieties of capitalism theory. *Socio-Economic Review* 5(2), 261-286. <https://doi.org/10.1093/ser/mwl025>.
- Befu, Harumi (1993). (ed. Befu, Harumi) *Nationalism and Nihonjinron*. In *Cultural Nationalism in East Asia: Representation and Identity*. Berkeley: University of California Press, 107–135.
- Bengtsson, Erik (2013). Swedish Trade Unions and European Union Migrant Workers. *Journal of Industrial Relations* 55(2), 174-189. <https://doi.org/10.1177/0022185612473211>.
- Beretta, Silvio, Berkofsky, Axel, Rugge, Fabio (2014). Introduction. *Italy and Japan: How Similar Are They? A Comparative Analysis of Politics, Economics, and International Relations*. (eds. Beretta, Silvio, Berkofsky, Axel, Rugge, Fabio) Milan: Springer-Verlag, 1-10. https://doi.org/10.1007/978-88-470-2568-4_1.

- Beretta, Silvio, Berkofsky, Axel, Rugge, Fabio (2014). (eds.) *Italy and Japan: How Similar Are They? A Comparative Analysis of Politics, Economics, and International Relations*. Milan: Springer-Verlag. <https://doi.org/10.1007/978-88-470-2568-4>.
- Berger, Suzanne, Dore, Ronald Philip (1996). (eds.) *National Diversity and Global Capitalism*. Ithaca, NY; London: Cornell University Press.
- Bernstein, Jeffrey R. (1997). Japanese Capitalism. *Creating Modern Capitalism: How Entrepreneurs, Companies, and Countries Triumphed in Three Industrial Revolutions* (ed. Thomas K. McCraw). Cambridge: Harvard University Press, 439-492.
- Bianchi, Marcello, Bianco, Magda, Giacomelli, Silvia, Paccès, Alessio M., Trento, Sandro (2005). *Proprietà e controllo delle imprese in Italia*. Bologna: Il Mulino. <https://doi.org/10.978.8815/142498>.
- Blauw, Wim P. (2002). Recruitment strategies and labour mobility: Background paper. *The Political Economy of Migration in an Integrating Europe (PEMINT)*. Working Paper 4/2002.
- Boeri, Tito (2006). Behind the job miracle. Paris: Centre de Conférences Internationales. *La Réévaluation de la Stratégie de l'OCDE pour l'Emploi: Diagnostic, Limites et Enseignements pour la France*. 16-17 November.
- Böhning, Wolf Rüdiger (1981). Elements of a Theory of International Economic Migration to Industrial National States. *Global trends in migration: theory and research on international population movements* (eds. Kritiz, Mary M., Keely, Charles B., Tomasi, Silvano M.). New York: Center for Migration Studies, 28-43.
- Boix, Carles (1998). *Political Parties, Growth and Equality: Conservative and Social Democratic Economic Strategies in the World Economy*. Cambridge: Cambridge University Press.
- Bollérot, Patrick (2002). Labour shortages and employability: a European and international approach. *International Social Security Review* 55(3), 19-38. <https://doi.org/10.1111/1468-246X.00130>.
- Bonoli, Giuliano (2010). The political economy of active labour-market policy. *Politics & Society* 38(4), 435-457. <https://doi.org/10.1177/0032329210381235>.
- Bonoli, Giuliano, Shinkawa, Toshimitsu (2005). Population ageing and the logics of pension reform in Western Europe, East Asia and North America. *Ageing and Pension Reform Around the World* (eds. Bonoli, Giuliano, Shinkawa, Toshimitsu). Cheltenham: UK; Northampton, MA, USA: Edward Elgar, 1-23.

- Borjas, George J. (1999). Immigration and Welfare Magnets. *Journal of Labor Economics* 17(4), 607-637. <https://doi.org/10.1086/209933>.
- Boyer, Robert (2004). How and why capitalisms differ. *Economy and Society* 34(4), 509-557. <https://doi.org/10.1080/03085140500277070>.
- Boyer, Robert (2005). Coherence, Diversity, and the Evolution of Capitalisms-the Institutional Complementarity Hypothesis. *Evolutionary and Institutional Economics Review* 2(1), 43-80. <https://doi.org/10.14441/eier.2.43>.
- Boyer, Robert (2010). Conversations. *European Economics at a Crossroads* (eds. Barkley, Rosser J., Holt, Richard P. F., Colander, David). Cheltenham: Edward Elgar Publishing Limited. <https://doi.org/10.4337/9781849805544>.
- Boyer, Robert (2014). From "Japanophilia" to indifference? Three decades of research on contemporary Japan. *The Great Transformation of Japanese Capitalism* (ed. Lechevalier, Sébastien). Abingdon: Routledge, xiii-xxxv.
- Boyer, Robert (2019). How Scientific Breakthroughs and Social Innovations Shape the Evolution of the Healthcare Sector. *Innovation Beyond Technology: Science for Society and Interdisciplinary Approaches* (ed. Lechevalier, Sébastien). Singapore: Springer, 89-120. https://doi.org/10.1007/978-981-13-9053-1_5.
- Boyer, Robert, Drache, Daniel (2016). (eds.) *States against Markets: The Limits of Globalization*. London: Routledge.
- Breunig, Christian, Luedtke, Adam (2008). What Motivates the Gatekeepers? Explaining Governing Party Preferences on Immigration. *Governance* 21(1), 123-146. <https://doi.org/10.1111/j.1468-0491.2007.00388.x>.
- Briggs, Vernon M. Jr. (2001). *Immigration and American Unionism*. Ithaca, NY: Cornell University Press.
- Briones, Leah (2009). *Empowering Migrant Women: Why Agency and Rights Are Not Enough*. Farnham: Ashgate.
- Britannica, The Editors of Encyclopaedia Britannica (2020). *Shogunate*. Encyclopedia Britannica. <https://www.britannica.com/topic/shogunate>. (11/10/2021).
- Britannica, The Editors of Encyclopaedia Britannica (2020). *Welfare state*. Encyclopedia Britannica. <https://www.britannica.com/topic/welfare-state>. (15/09/2021).
- Brody, Betsy Teresa (2002). *Opening The Door. Immigration, Ethnicity, and Globalization in Japan*. Oxon: Routledge.

- Brown, Clair, Reich, Michael, Nakata, Yoshifumi, Ulman, Lloyd (1997). *Work and Pay in the United States and Japan*. New York: Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780195115215.001.0001>.
- Brubaker, Rogers. (1992). *Citizenship and Nationhood in France and Germany*. Cambridge, MA: Harvard University Press.
- Bucken-Knapp, Gregg (2007). Varieties of capitalism and labour migration policy. *University West Discussion Paper*. <http://www2.bibliotek.htu.se/publ/prerapp200701.pdf>.
- Bucken-Knapp, Gregg (2009). *Defending the Swedish Model: Social Democrats, Trade Unions, and Labor Migration Policy Reform*. Lanham: Rowman & Littlefield.
- Burgess, Christopher James (2010). The 'Illusion' of Homogeneous Japan and National Character: Discourse as a Tool to Transcend the 'Myth' vs. 'Reality' Binary. *Asia-Pacific Journal—Japan Focus* 8(9), 1-24.
- Burgess, Christopher James (2020). Keeping the Door Closed: The 2018 Revisions to the 'Immigration' Control Act as a Continuation of Japan's 'No-Immigration' Principle. *Electronic Journal of Contemporary Japanese Studies* 20/1.
- Callinicos, Alex (2010). *Bonfire of Illusions: The Twin Crises of the Liberal World*. Cambridge: Polity Press.
- Campbell, John L., Pedersen, Ove K. (2001). (eds.) *The Rise of Neoliberalism and Institutional Analysis*. Princeton: Princeton University Press.
- Carchedi, Francesco (1999). (ed.) *La risorsa inaspettata: lavoro e formazione degli immigrati nell'Europa mediterranea*. Roma: Ediesse.
- Card, David, Dustmann, Christian, Preston, Ian (2012). Immigration, Wages, and Compositional Amenities. *Journal of the European Economic Association* 10(1), 78-119.
- Cardano, Mario (2011). *La ricerca qualitativa*. Bologna: il Mulino.
- Casella, Francesco (2016). *La Legislazione Nazionale in Materia di Immigrazione*. Avviso Pubblico. <https://www.avvisopubblico.it/home/home/cosa-facciamo/informare/documenti-tematici/immigrazione/la-legislazione-nazionale-materia-immigrazione/>. (12/10/2021).
- Castles, Stephen, Kosack, Godula (1973). *Immigrant Workers and Class Structure in Western Europe*. Oxford: Oxford University Press.
- Castles, Stephen, Miller, Mark J. (2009). *The Age of Migration: International Population Movements in the Modern World*. Basingstoke: Palgrave Macmillian (4th edition).
- Caviedes, Alexander A. (2010). *Prying Open Fortress Europe: The Turn to Sectoral Labor Migration*. Lanham: Lexington Books.

- Cella, Gian Primo, Treu, Tiziano (2009). *Relazioni industriali e contrattazione collettiva*. Bologna: Il Mulino.
- Cerna, Lucie (2009). The Varieties of High-Skilled Immigration Policies: Coalitions and Policy Outputs in Advanced Industrial Countries. *Journal of European Public Policy* 16(1), 144-161. <https://doi.org/10.1080/13501760802453148>.
- Cerny, Phillip G. (1997). Paradoxes of the Competition State: The Dynamics of Political Globalization. *Government and Opposition* 32(2), 251-274. <https://doi.org/10.1111/j.1477-7053.1997.tb00161.x>.
- Cerny, Phillip G., Menz, Georg, Soederberg, Susanne (2005). Different Roads to Globalization: Neoliberalism, the Competition State, and Politics in a More Open World. *Internalizing Globalization: The Rise of Neoliberalism and the Decline of National Varieties of Capitalism* (eds. Soederberg, Susanne, Menz, Georg, Cerny, Phillip G.). Basingstoke, UK: Palgrave Macmillan, 1-30. https://doi.org/10.1057/9780230524439_1.
- Cerny, Phillip G., Menz, Georg, Soederberg, Susanne (2005). (eds.) *Internalizing Globalization: The Rise of Neoliberalism and the Decline of National Varieties of Capitalism*. Basingstoke, UK: Palgrave Macmillan. <https://doi.org/10.1057/9780230524439>.
- Chang, Kyung-Sup (2010). Individualization without Individualism: Compressed Modernity and Obfuscated Family Crisis in East Asia. *Journal of Intimate and Public Spheres* 0, 23-39.
- Chapple, Julian (2014). Japan's immigration intimation and their neglected language policy requisites. *Asian and Pacific Migration Journal* 23(3), 345-360. <https://doi.org/10.1177/011719681402300305>.
- Chase-Dunn, Christopher, Kawano, Yukio, Brewer, Benjamin D. (2000). Trade Globalization since 1795: Waves of Integration in the World-System. *American Sociological Review* 65(1), 77-95. <https://doi.org/10.2307/2657290>.
- Checchi, Daniele (2013). Labour market and inequality trends in Italy. *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan* (eds. Magara, Hideko, Sacchi, Stefano). Cheltenham: Edward Elgar Publishing Ltd., 148-170. <https://doi.org/10.4337/9780857932938.00012>.
- Chiavacci, David (2007). The Social Basis of Developmental Capitalism in Japan: From Post-war Mobilization to Current Stress Symptoms and Future Disintegration. *Asian Business & Management* 6(1), 35-55. <https://doi.org/10.1057/palgrave.abm.9200207>.

- Chiavacci, David (2008). From Class Struggle to General Middle-Class Society to Divided Society: Societal Models of Inequality in Postwar Japan. *Social Science Japan Journal* 11(1), 5-27. <https://doi.org/10.1093/ssjj/jyn022>.
- Chiavacci, David, Lechevalier, Sébastien (2017). Japanese political economy revisited: diverse corporate change, institutional transformation, and Abenomics. *Japan Forum* 29(3), 299-311. <https://doi.org/10.1080/09555803.2017.1284147>.
- Chiesi, Antonio M. (2013). Corporate governance and firm ownership in Italy. *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan* (eds. Magara, Hideko, Sacchi, Stefano). Cheltenham: Edward Elgar Publishing Ltd., 61-83. <https://doi.org/10.4337/9780857932938.00008>.
- Chitose, Yoshimi (2009). The impact of long-distance family migration on married women's employment status in Japan. *Journal of Population Problems* 65(3), 21-39.
- Chung, Erin Aeran (2010). *Immigration and Citizenship in Japan*. New York: Cambridge University Press.
- Chung, Erin Aeran (2014). Japan and South Korea. Immigration Control and Immigrant Incorporation. *Controlling Immigration, A Global Perspective* (eds. Hollifield, James F., Martin, Philip L., Orrenius, Pia M.). Stanford: Stanford University Press, 414-415.
- Cillo, Rossana, Perocco, Fabio (2014). Crisi e immigrazione in Europa. *Immigrazione e sindacato* (eds. Carrera, Francesca, Galossi, Emanuele). Roma: Ediesse, 353-376.
- CISL (2 November, 2015). *Cos'è un ente bilaterale?*. [https://www.cisl.it/notizie/notizie-partecipazione/notizie-partecipazione-bilateralita/cos-e-un-ente-bilaterale/#:~:text=Cos%E2%80%99%C3%A8%20un%20ente%20bilaterale%3F%20L%E2%80%99Ente%20bilaterale%20C3%A8%20un,e%20imprenditori%2C%20allo%20sviluppo%20dell%E2%80%99occupazione%2C%20alla%20tutela%20sociale.\(16/11/2021\)](https://www.cisl.it/notizie/notizie-partecipazione/notizie-partecipazione-bilateralita/cos-e-un-ente-bilaterale/#:~:text=Cos%E2%80%99%C3%A8%20un%20ente%20bilaterale%3F%20L%E2%80%99Ente%20bilaterale%20C3%A8%20un,e%20imprenditori%2C%20allo%20sviluppo%20dell%E2%80%99occupazione%2C%20alla%20tutela%20sociale.(16/11/2021)).
- Ciupijus, Zinovijus (2011). Mobile central eastern Europeans in Britain: successful European Union citizens and disadvantaged labour migrants? *Work, Employment and Society* 25(3), 540-550. <https://doi.org/10.1177/0950017011407962>.
- Coates, David (2005). *Varieties of capitalism, varieties of approaches*. Basingtoke: Palgrave Macmillan.
- Confartigianato Imprese (2021). *Chi siamo*. <https://www.confartigianato.it/noi/>. (18/07/2021).
- Confederazione Generale Italiana dell'Artigianato (26 September, 2020). *Causa Covid, rischiamo un boom di lavoratori in nero. In Italia sono attualmente 3,3 milioni*.

- <http://www.cgiamestre.com/wp-content/uploads/2019/11/Italia-disocc-lavoro-nero-26.09.2020.pdf>. (19/10/2021).
- Confindustria (20 April, 2021). *Carlo Bonomi incontra il Presidente del Consiglio Mario Draghi*. <https://www.confindustria.it/notizie/dettaglio-notizie/carlo-bonomi-incontra-il-presidente-del-consiglio-mario-draghi>. (19/10/2021).
 - Confindustria (2021). *Chi siamo. Valori e identità*. <https://www.confindustria.it/home/chi-siamo/valori-e-identita>. (18/07/2021).
 - Confindustria Centro Studi (June, 2016). Immigrati: da emergenza a opportunità. Dimensione, effetti economici, politiche. *Scenari Economici* 26.
 - Connolly, Heather, Marino, Stefania, Martinez Lucio, Miguel (2017). "Justice for Janitors" goes Dutch. The limits and possibilities of unions' adoption of organizing in a context of regulated social partnership. *Work, Employment and Society* 31(2), 319-335. <https://doi.org/10.1177/0950017016677943>.
 - Contini, Giovanni (1991). Enterprise management and employer organization in Italy: Fiat, public enterprise and Confindustria 1922–1990. *The Power to Manage?: Employers and Industrial Relations in Comparative-Historical Perspective* (eds. Tolliday, Steven, Zeitlin, Jonathan). London: Routledge, 178-198.
 - Corbetta, Piergiorgio (1999). *Metodologia e tecniche della ricerca sociale*. Bologna: Il Mulino.
 - Costalunga, Nicola (2021). Entry Denied: Japan's Border Restrictions in the Time of the COVID-19 Emergency. *Dve Domovini • Two Homelands* 54, 77-88. <https://doi.org/10.3986/dd.2021.2.0>.
 - Cournède, Boris (2006) Removing Obstacles to Employment for Women in Ireland. *OECD Economics Department Working Papers* No. 511. OECD Publishing. <https://doi.org/10.1787/431167074033>.
 - Crouch, Colin (2005). *Capitalist Diversity and Change: Recombinant Governance and Institutional Entrepreneurs*. Oxford: Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780199286652.001.0001>.
 - Crouch, Colin (2011). *The Strange Non-Death of Neo-Liberalism*. Oxford: Polity.
 - Crouch, Colin, Finegold, David, Sako, Mari (1999). *Are Skills the Answer?: The Political Economy of Skill Creation in Advanced Industrial Countries*. Oxford: Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780198294382.001.0001>.

- Crouch, Colin, Streeck, Wolfgang (1997). (eds.) *Political Economy of Modern Capitalism: Mapping Convergence and Diversity*. London: Sage Publications. <http://dx.doi.org/10.4135/9781446217849>.
- Crouch, Colin, Streeck, Wolfgang (2006). (eds.) *The Diversity of Democracy Corporatism, Social Order and Political Conflict*. Cheltenham: Edward Elgar.
- Da Roit, Barbara, González-Ferrer, Amparo G., Moreno-Fuentes, Francisco J. (2013). The Southern European Migrant-Based Care Model. Long-Term Care and Employment Trajectories in Italy and Spain. *European Societies* 15(4), 577-596. <https://doi.org/10.1080/14616696.2013.836405>.
- Da Roit, Barbara, Hoogenboom, Marcel, Weicht, Bernhard (2015). The Gender Informal Care Gap. *European Societies* 17(2), 1-20. <https://doi.org/10.1080/14616696.2015.1007153>.
- Davis, Amber Jane (2012). The Impact of Anti-Immigration Parties on Mainstream Parties' Immigration Positions in the Netherlands, Flanders and the UK 1987–2010: Divided Electorates, Left-Right Politics and the Pull Towards Restrictionism. *Ph.D. thesis*. EUI, Florence. <https://doi.org/10.2870/4016>.
- Deakin, Simon (2013). Addressing Labour Market Segmentation: The Role of Labour Law. *Working Paper* No. 446. ILO.
- Della Puppa, Francesco (2018). Sindacato, lavoratori immigrati e discriminazioni razziali nell'Italia della crisi. *Mondi Migranti* 2, 117-147. <https://doi.org/10.3280/MM2018-002007>.
- DEMIG (2015). *DEMIG (2015) DEMIG POLICY, version 1.3, Online Edition*. Oxford: International Migration Institute, University of Oxford. www.migrationdeterminants.eu. (16/11/2021).
- Dench, Sally, Hurstfield, Jennifer, Hill, Darcy, Akroyd, Karen (2006). Employers' Use of Migrant Labour: Main Report. *Home Office Online Report* 03/06.
- Devitt, Camilla (2011). Varieties of Capitalism, Variation in Labour Immigration. *Journal of Ethnic and Migration Studies* 37(4), 579-596. <https://doi.org/10.1080/1369183X.2011.545273>.
- Devitt, Camilla (2012). Labour migration governance in contemporary Europe. The UK case. *Working papers*. FIERI.
- Devore, Marc R. (2015). Defying Convergence: Globalisation and Varieties of Defence-Industrial Capitalism. *New Political Economy* 20(4), 569-593. <https://doi.org/10.1080/13563467.2014.951612>.

- Di Pasquale, Enrico, Stuppini, Andrea, Tronchin, Chiara (21 May, 2019). *Risposte sbagliate: il welfare separato per immigrati*. lavoce.info. <https://www.lavoce.info/archives/59211/risposte-sbagliate-il-welfare-separato-per-immigrati-2/>. (12/10/2021).
- Direzione Generale dell'Immigrazione e delle Politiche di Integrazione (2020). *Gli stranieri nel mercato del lavoro in Italia. Sintesi delle principali evidenze e prospettiva internazionale - X Rapporto annuale*. Ministero del Lavoro e delle Politiche Sociali. <https://www.lavoro.gov.it/documenti-e-norme/studi-e-statistiche/Documents/Decimo%20Rapporto%20Annuale%20-%20Gli%20stranieri%20nel%20mercato%20del%20lavoro%20in%20Italia%202020/X-Rapporto-Annuale-stranieri-nel-mercato-del-lavoro-in-Italia.pdf>. (26/11/2021).
- Djelti, Samir (2017). Osmosis: the Unifying Theory of Human Migration. *Revue Algérienne d'Economie et du Management* 8(2), 48-59.
- Djelti, Samir (2017). The Evolution of the Human Migration Determinants. *Draft paper*. International conference on "Crossing Boundaries: Youth, Migration, and Development". Alakhawayn University, Ifran, Morocco (2-4 March).
- Doi, Takeo (1986). *The Anatomy of Self: The Individual Versus Society*. Tōkyō: Kodansha International.
- Dore, Ronald Philip (1973). *British Factory, Japanese Factory: The Origins of National Diversity in Industrial Relations*. Berkeley: University of California Press.
- Dore, Ronald Philip (1986). *Flexible Rigidities: Industrial Policy and Structural Adjustment in the Japanese Economy, 1970-80*. London: Athlone.
- Dore, Ronald Philip (2000). *Stock Market Capitalism: Welfare Capitalism Japan and Germany versus the Anglo-Saxons*. New York: Oxford University Press.
- Dore, Ronald Philip (2006). *Dare no tame no kaisha ni suruka*. Tōkyō: Iwanami Shoten.
- Dore, Ronald Philip (2013). *British Factory Japanese Factory: The Origins of National Diversity in Industrial Relations*. London: Routledge.
- Dore, Ronald Philip (2013). The residual Japaneseness of Japanese corporate governance. *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan* (eds. Magara, Hideko, Sacchi, Stefano). Cheltenham: Edward Elgar Publishing Ltd., 25-60. <https://doi.org/10.4337/9780857932938.00007>.
- Douglass, Mike (2003). The Singularities of International Migration of Women to Japan: Past, Present, and Future. *Japan and Global Migration: Foreign Workers and the Advent of*

- a Multicultural Society*. (eds. Douglass, Mike, Roberts, Glenda Susan). Honolulu: University of Hawaii Press, 91-119.
- Douglass, Mike, Roberts, Glenda Susan (2003). Japan in a Global Age of Migration. *Japan and Global Migration: Foreign Workers and the Advent of a Multicultural Society*. (eds. Douglass, Mike, Roberts, Glenda Susan). Honolulu: University of Hawaii Press, 3-37.
 - Dunlop, John T. (1958). *Industrial Relations Systems*. New York: Holt, Rinehart & Winston.
 - Ehara, Takekazu (1984). *Gendai Kōtō Kyōiku no Kōzō*. Tōkyō: Tōkyō Daigaku Shuppankai.
 - Eisenstadt, Shmuel Noah (1996). *Japanese Civilization: A Comparative View*. Chicago: University of Chicago Press.
 - Elias, Peter (1997). Occupational Classification (ISCO-88): Concepts, Methods, Reliability, Validity and Cross-National Comparability. *OECD Labour Market and Social Policy Occasional Papers* 20, 1-22. <https://doi.org/10.1787/304441717388>.
 - Emmenegger, Patrick (2015). The politics of job security regulations in Western Europe: from drift to layering, *Politics and Society* 43(1), 89-118. <https://doi.org/10.1177/0032329214555099>.
 - Emmenegger, Patrick, Häusermann, Silja, Palier, Bruno, Seeleib-Kaiser, Martin (2012). How we grow unequal. *The Age of Dualization: The Changing Face of Inequality in Deindustrializing Societies* (eds. Emmenegger, Patrick, Häusermann, Silja, Palier, Bruno, Seeleib-Kaiser, Martin). Oxford: Oxford University Press, 3-26. <https://doi.org/10.1093/acprof:oso/9780199797899.001.0001>.
 - Endoh, Toake (2019). The politics of Japan's immigration and alien residence control. *Asian and Pacific Migration Journal* 28(3), 324-352. <https://doi.org/10.1177/0117196819873733>.
 - Engels, Friedrich (1845). *Die Lage der arbeitenden Klasse in England (The Condition of the Working Class in England)*. Germany.
 - England, Paula, Budig, Michelle, Folbre, Nancy (2002). Wages of virtue: The relative pay of care work. *Social Problems* 49(4), 455-473. <https://doi.org/10.1525/sp.2002.49.4.455>.
 - Esping-Andersen, Gøsta (1990). *The Three Worlds of Welfare Capitalism*. New York: Princeton University Press.
 - Esping-Andersen, Gøsta (1997). Hybrid or Unique?: the Japanese Welfare State Between Europe and America. *Journal of European Social Policy* 7(3), 179-189. <https://doi.org/10.1177/095892879700700301>.

- Esping-Andersen, Gøsta (1998). The Three Political Economies of the Welfare State. *Power Resources Theory and the Welfare State: A Critical Approach* (eds. O'Connor Julia S., Olsen, Gregg M.). Toronto: University of Toronto Press, 123-153.
- Esping-Andersen, Gøsta (1999). *Social Foundations of Postindustrial Economies*. New York: Oxford University Press. <https://doi.org/10.1093/0198742002.001.0001>.
- Esping-Andersen, Gøsta (2009). *The Incomplete Revolution: Adapting to Women's New Roles*. Cambridge: Policy Press.
- Estévez-Abe, Margarita (2008). *Welfare and Capitalism in Postwar Japan*. New York: Cambridge University Press. <https://doi.org/10.1017/CBO9780511510069>.
- Estévez-Abe, Margarita (2013). An International Comparison of Gender Equality: Why Is the Japanese Gender Gap So Persistent? *Japan Labor Review* 10(2), 82-100.
- Estévez-Abe, Margarita (2015). The Outsourcing of House Cleaning and Low Skill Immigrant Workers. *Social Politics* 22(2), 147-169. <https://doi.org/10.1093/sp/jxv007>.
- Estévez-Abe, Margarita, Iversen, Torben, Soskice, David (2001). Social Protection and the Formation of Skills: A Reinterpretation of the Welfare State. *Varieties of Capitalism: The Institutional Foundations of Comparative Advantage* (eds. Hall, Peter A., Soskice, David). Oxford: Oxford University Press, 145-183.
- Estévez-Abe, Margarita, Kim, Yeong-Soon (2014). Presidents, Prime Ministers and Politics of Care – Why Korea Expanded Childcare Much More than Japan. *Social Policy and Administration* 48(6), 666-685. <https://doi.org/10.1111/spol.12090>.
- Estévez-Abe, Margarita, Naldini, Manuela (2016). Politics of defamilialization: A comparison of Italy, Japan, Korea and Spain. *Journal of European Social Policy* 26(4). 327-343. <https://doi.org/10.1177/0958928716657276>.
- Estévez-Abe, Margarita, Yang, Jae-jin, Choi, Young Jun (2016). Beyond familialism: Recalibrating family, state and market in Southern Europe and East Asia. *Journal of European Social Policy* 26(4), 301-313. <https://doi.org/10.1177/0958928716657274>.
- European Commission (11 November, 2016). *European Semester Thematic Factsheet. Active Labour Market Policies*. https://ec.europa.eu/info/sites/default/files/european-semester_thematic-factsheet_active-labour-market-policies_en.pdf. (15/11/2021).
- European Commission (2018). *2018 SBA Fact Sheet — Italy*. <https://ec.europa.eu/docsroom/documents/32581/attachments/16/translations/en/renditions/native>. (15/11/2021).

- European Commission (2019). *SBA Fact Sheet Italy 2019*. <https://ec.europa.eu/docsroom/documents/38662/attachments/16/translations/en/renditions/native>. (15/11/2021).
- Eurostat (2018). *Statistics on small and medium-sized enterprises*. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Statistics_on_small_and_medium-sized_enterprises#Country_by_country_analysis. (15/11/2021).
- Fellini, Ivana, Fullin, Giovanna (2008). Employment change, institutions and migrant labour: the Italian case in comparative perspective. *Stato e Mercato* 113(2), 293-330. <https://doi.org/10.1425/90963>.
- Fenger, Menno H. J. (2007). Welfare regimes in Central and Eastern Europe: Incorporating post-communist countries in a welfare regime typology. *Contemporary Issues and Ideas in Social Sciences* 3(2), 1-30.
- Ferdosi, Mohammed (2019). Post-crisis labour market outcomes in worlds of welfare and varieties of capitalism, *Transfer: European Review of Labour and Research* 25(4), 407-420. <https://doi.org/10.1177/1024258919862491>.
- Ferrera, Maurizio (1996). The "Southern Model" of Welfare in Social Europe. *Journal of European Social Policy*. 6(1), 17-37. <https://doi.org/10.1177/095892879600600102>.
- Ferrera, Maurizio (2012). *Le politiche sociali. L'Italia in prospettiva comparata*. Bologna: Il Mulino.
- Fielding, Tony (2016). *Asian Migration: Social and geographical mobilities in Southeast, East, and Northeast Asia*. Oxon: Routledge.
- Filippini, Carlo (2014). Small and Medium-Sized Enterprises (SMEs) in Italy and Japan. *Italy and Japan: How Similar Are They? A Comparative Analysis of Politics, Economics, and International Relations* (eds. Beretta, Silvio, Berkofsky, Axel, Rugge, Fabio). Milan: Springer-Verlag, 235-243. https://doi.org/10.1007/978-88-470-2568-4_13.
- Folbre, Nancy (2012). The Political Economy of Human Capital. *Review of Radical Political Economics* 44(3), 281-292. <https://doi.org/10.1177/0486613412440240>.
- Fondazione ISMU (23 February, 2021). *XXVI Rapporto ISMU sulle migrazioni 2020*. <https://www.ismu.org/xxvi-rapporto-ismu-sulle-migrazioni-2020-comunicato-stampa-23-2-2021/>. (11/10/2021).

- Frank, Denis (2012). State Union and Unauthorized Migrants: A Case Study of Deportation Policy in Sweden. *Nordic Journal of Migration Research* 2(4), 298–307. <https://doi.org/10.2478/v10202-011-0050-9>.
- Freeman, Gary P. (2004), Immigrant Incorporation in Western Democracies. *International Migration Review* 38(3), 945-969. <https://doi.org/10.1111/j.1747-7379.2004.tb00225.x>.
- Frey, Bruno S. (2010). Superb Posner - but can we go further? *Journal of Institutional Economics* 6(1), 65-69. <https://doi.org/10.1017/S1744137409990166>.
- Friedman, David (1988). *The Misunderstood Miracle: Industrial Development and Political Change in Japan*. Ithaca, NY: Cornell University Press.
- Fujiyasu, Minako (February, 1991). *Japan Pressed to Open Doors to More Foreign Workers*. Business Today, 40-42.
- Fullin, Giovanna, Reyneri, Emilio (2011). Low Unemployment and Bad Jobs for New Immigrants in Italy. *International Migration* 49(1), 118-147. <https://doi.org/10.1111/j.1468-2435.2009.00594.x>.
- Fulton, Lionel, Sechi, Cinzia (2019). *ETUC Annual Gender Equality Survey 2019. 12th edition*. European Trade Union Institute (ETUI). https://www.etuc.org/sites/default/files/circular/file/2019-05/ETUC_Annual_Equality_Survey%202019_FINAL_EN.pdf. (16/11/2021).
- Gächter, August (2000). Austria: Protecting Indigenous Workers from Immigrants. *Trade Unions, Immigration, and Immigrants in Europe, 1960–1993: A Comparative Study of the Attitudes and Actions of Trade Unions in Seven West European Countries* (eds. Penninx, Rinus, Roosblad, Judith). Oxford: Berghahn Books, 65-89.
- Gallie, Duncan (2007). Production Regimes, Employment Regimes and the Quality of Work. *Employment Regimes and Quality of Work* (ed. Gallie, Duncan). Oxford: Oxford University Press, 1-34. <https://doi.org/10.1093/acprof:oso/9780199230105.003.0001>.
- Gamble, Andrew (2009). *The Spectre at the Feast: Capitalist Crisis and the Politics of Recession*. Basingstoke: Palgrave Macmillan.
- Garon, Sheldon (1994). Re-thinking Modernization and Modernity in Japanese History: A Focus on State Society Relations. *Journal of Asian Studies* 53(2), 346-366. <https://doi.org/10.2307/2059838>.
- Garon, Sheldon (1997). *Molding Japanese Minds: The State in Everyday Life*. Princeton: Princeton University Press.

- Gerschenkron, Alexander (1962). *Economic Backwardness in Historical Perspective: A Book of Essays*. Cambridge, MA: Harvard University Press.
- Gerschenkron, Alexander (1968). *Continuity in History and Other Essays*. Cambridge, MA: Harvard University Press.
- Gerson, Kathleen (2010). *The Unfinished Revolution: Coming of Age in a New Era of Gender, Work, and Family*. New York: Oxford University Press.
- Gilpin, Robert G. (2001). *Global Political Economy: Understanding the International Economic Order*. Princeton, New Jersey: Princeton University Press.
- Goldthorpe, John H. (1984). The End of Convergence: Corporatist and Dualist Tendencies in Modern Western Societies. *Order and Conflict in Contemporary Capitalism* (ed. Goldthorpe, John H.). Oxford: Clarendon Press, 315-334.
- Gordon, Andrew (1998). *The Wages of Affluence. Labor and Management in Postwar Japan*. Cambridge, Massachusetts: Harvard University Press.
- Gordon, Andrew (2017). New and Enduring Dual Structures of Employment in Japan: The Rise of Non-Regular Labor, 1980s-2010s. *Social Science Japan Journal* 20(1), 9-36. <https://doi.org/10.1093/ssjj/jyw042>.
- Gordon, Milton M. (1964). *Assimilation in American Life: The Role of Race, Religion and National Origins*. New York: Oxford University Press.
- Green, David (28 March, 2017). *As Its Population Ages, Japan Quietly Turns to Immigration*. Migration Policy Institute. <https://www.migrationpolicy.org/article/its-population-ages-japan-quietly-turns-immigration>. (01/07/2021).
- Greenbie, Barrie B. (1988). *Space and Spirit in Modern Japan*. New Haven, Conn.: Yale University Press.
- Guest, P. (1993). Gender and Migration in Southeast Asia. *Proceedings from the International Colloquium "Migration, Development and Gender in the ASEAN Region"* (ed. Ariffin, Jamilah). Kuala Lumpur: University of Malaysia, 1-24.
- Hainmueller, Jens, Hiscox, Michael J. (2010). Attitudes Toward Highly Skilled and Low-Skilled Immigration: Evidence from a Survey Experiment. *American Political Science Review* 104(1), 61-84. <https://doi.org/doi:10.1017/S0003055409990372>.
- Hall, Peter A., Gingerich, Daniel W. (2009). Varieties of Capitalism and Institutional Complementarities in the Macroeconomy: An Empirical Analysis. *British Journal of Political Science* 39(3), 449-482. <https://doi.org/10.1017/S0007123409000672>.

- Hall, Peter A., Soskice, David (2001). An Introduction to Varieties of Capitalism. *Varieties of Capitalism: The Institutional Foundations of Comparative Advantage* (eds. Hall, Peter A., Soskice, David). Oxford: Oxford University Press. <https://doi.org/10.1093/0199247757.003.0001>.
- Hall, Peter A., Soskice, David (2001). (eds.) *Varieties of Capitalism: The Institutional Foundations of Comparative Advantage*. Oxford: Oxford University Press. <https://doi.org/10.1093/0199247757.001.0001>.
- Hamaguchi, Keiichiro (2019). How Have Japanese Policies Changed in Accepting Foreign Workers? *Japan Labor Issues* 3(14), 2-7.
- Hamaguchi, Keiichiro (2019). Japanese Policy regarding Employment-like Working Styles. *Japan Labor Issues* 3(18), 7-9.
- Hamaguchi, Keiichiro (2020). Spread of the Novel Coronavirus and the Future of Japanese Labor Policy. *Japan Labor Issues* 4(24), 2-8.
- Hamaguchi, Keiichiro (2021). Labor-management Relations in Japan Part I: Characteristics of the Collective Labor Relations System. *Japan Labor Issues* 5(30), 11-14.
- Hamaguchi, Keiichiro (2021). Labor-management Relations in Japan Part II: Trends and Current State of Collective Labor Relations. *Japan Labor Issues* 5(31), 23-28.
- Hammar, Tomas (1990). *Democracy and the Nation State: Aliens, Denizens and Citizens in a World of International Migration*. Aldershot, England: Avebury.
- Hancké, Bob, Rhodes, Martin, Thatcher, Mark (2007). Introduction: Beyond Varieties of Capitalism. *Beyond Varieties of Capitalism: Conflict, Contradictions, and Complementarities in the European Economy* (eds. Hancké Bob, Rhodes, Martin, Thatcher, Mark). Oxford: Oxford University Press, 3-38. <https://doi.org/10.1093/acprof:oso/9780199206483.001.0001>.
- Hansen, Randall (2002). Globalization, Embedded Realism, and Path Dependence: The Other Immigrants to Europe. *Comparative Political Studies* 35(3), 259-283. <https://doi.org/10.1177/0010414002035003001>.
- Harris, Nigel (1995). *The New Untouchables: Immigration and the New World Worker*. New York: I.B. Tauris Publishers.
- Harvey, David (2005). *A Brief History of Neoliberalism*. Oxford: Oxford University Press.
- Harvey, David (2010). *The Enigma of Capital and the Crises of Capitalism*. London: Profile Books.

- Hashimoto, Akiko (1992). Ageing in Japan. *Ageing in East and South-East Asia* (ed. Phillips, David R.). London; Melbourne: Edward Arnold, 36-44.
- Haus, Leah (2002). *Unions, Immigration, and Internationalization: New Challenges and Changing Coalitions in the United States and France*. New York, NY: Palgrave Macmillan.
- Hay, Colin (2004). Common trajectories, variable paces, divergent outcomes? Models of European capitalism under conditions of complex economic interdependence. *Review of International Political Economy* 11(2), 231-262. <https://doi.org/10.1080/09692290420001672796>.
- Heyes, Jason, Lewis, Paul, Clark, Ian (2012). Varieties of Capitalism, Neoliberalism and the Economic Crisis of 2008-? *Industrial Relations Journal*. 43(3), 222-241. <https://doi.org/10.1111/j.1468-2338.2012.00669.x>.
- Hochschild, Arlie Russell (2000). Global Care Chains and Emotional Surplus Value. *On the Edge: Globalization and the New Millennium* (eds. Giddens, Tony, Hutton, Will). London: Sage Publishers, 130-146.
- Hochschild, Arlie Russell (2001). Global Chains of Care. *Review of Women's Studies* 11(1-2), 197-209.
- Holland, John H. (1995). *Hidden order: How adaptation builds complexity*. Cambridge, MA: Helix Books.
- Hollifield, James F. (1992). Migration and international relations: cooperation and control in the European Community. *International Migration Review* 26(2): 568-595. <https://doi.org/10.1177/019791839202600220>.
- Hommerich, Carola (2016). The gap as threat: status anxiety in the "middle". *Social inequality in post-growth Japan: transformation during economic and demographic stagnation* (eds. Chiavacci, David, Hommerich, Carola). London: Routledge, 37-53.
- Honda, Kazunari (2007). Shift of Part-time Workers to the Mainstream Workforce and Union Organizing Activities of Labor Unions in Japan. *Japan Labor Review* 4(1), 41-67.
- Hosokawa, Ryo (2019). Employers' Obligation to Consider the Needs of Employees Returning from Childcare Leave. *Japan Labor Issues* 3(15), 13-17.
- Howell, Chris (2003). Varieties of Capitalism: And Then There Was One? *Comparative Politics* 36(1), 103-124. <https://doi.org/10.2307/4150162>.
- Hülsemeyer, Axel (2003). *Globalization in the 21st Century: Convergence and Divergence*. London: Palgrave Macmillan.

- Human Rights Watch (2020). *World Report 2020. Japan. Events of 2019*. <https://www.hrw.org/world-report/2020/country-chapters/japan#>. (15/01/2022).
- Human Rights Watch (2022). *World Report 2022. Japan. Events of 2021*. <https://www.hrw.org/world-report/2022/country-chapters/japan#319bbe>. (15/01/2022).
- Hurt, Michael William. (2014). *Hangukinron: The Shape of Korean National Ideology*. Berkeley: University of California.
- Hyman, Richard (2001). *Understanding European Trade Unionism: Between Market, Class & Society*. London: Sage Publications. <http://dx.doi.org/10.4135/9781446217139>.
- Ido, Masanobu, (2013). Party politics and the changing labour market in Japan. *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan* (eds. Magara, Hideko, Sacchi, Stefano). Cheltenham: Edward Elgar Publishing Ltd., 126-147. <https://doi.org/10.4337/9780857932938.00011>.
- Immigration Services Agency of Japan. Ministry of Justice of Japan (09 October, 2020). *Number of foreign residents as of June 2020 (Reiwa 2)*. <https://www.moj.go.jp/isa/content/930006222.pdf>. (12/10/2021).
- Immigration Services Agency of Japan. Ministry of Justice of Japan (2021). *Initiatives to Accept New Foreign Nationals and for the Realization of Society of Harmonious Coexistence*. <https://www.moj.go.jp/isa/content/930004452.pdf>. (12/10/2021).
- International Labour Organization (2016). *ILO Multilateral Framework on Labour Migration Non-binding principles and guidelines for a rights-based approach to labour migration*. ILO. International Migration Programme. https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_178672.pdf. (12/10/2021).
- International Labour Organization (07 April, 2020). *ILO: COVID-19 causes devastating losses in working hours and employment*. https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_740893/lang--en/index.htm. (15/11/2021).
- International Labour Organization (2021). *National Labour Law Profile: Japan*. https://www.ilo.org/ifpdial/information-resources/national-labour-law-profiles/WCMS_158904/lang--en/index.htm. (18/07/2021).
- International Monetary Fund (2021). *General government gross debt. Percent of GDP*. https://www.imf.org/external/datamapper/GGXWDG_NGDP@WEO/OEMDC/ADVEC/EOWORLD/VEN. (19/11/2021).

- IOM Glossary on Migration (2011). *Labour migration*. European Commission. Migration and Home Affairs (2nd edition). https://ec.europa.eu/home-affairs/pages/glossary/labour-migration_en. (26/01/2022).
- Isaac, Joseph E. (2003). Inter-Cultural and other Forces in the Transfer of Human Resource Management and Industrial Relations Practices under Globalisation. *WIFO Working Paper 202*, WIFO.
- Ishida, Hiroshi (1998). Educational Credentials and Labour-Market Entry Outcomes in Japan. *From School to Work: A Comparative Study of Educational Qualifications and Occupational Destinations* (eds. Shavit, Yossi, Muller, Walter). Oxford: Clarendon Press, 287-309.
- ISTAT. *Immigrati.Stat, dati e indicatori su immigrati e nuovi cittadini*. <http://stra-dati.istat.it>. (15/11/2021).
- ISTAT (2011). *Struttura e dimensione delle imprese*. Statistiche Report, Italian Central Statistical Office, June, Rome.
- ISTAT (26 April, 2017). *Il Futuro Demografico del Paese. Previsioni regionali della popolazione residente al 2065*. <https://www.istat.it/it/files/2017/04/previsioni-demografiche.pdf>. (14/10/2021).
- ISTAT (26 June, 2018). *La povertà in Italia*. <https://www.istat.it/it/archivio/217650>. (12/10/2021).
- ISTAT (03 May, 2021). *Indicatori Demografici. Anno 2020*. https://www.istat.it/it/files/2021/05/REPORT_INDICATORI-DEMOGRAFICI-2020.pdf. (11/10/2021).
- Itō, Takeshi, Suginozawa, Masako (2014). Flocking Together? The Breakdown and Revival of Political Clientelism in Italy and Japan. *Italy and Japan: How Similar Are They? A Comparative Analysis of Politics, Economics, and International Relations* (eds. Beretta, Silvio, Berkofsky, Axel, Ruge, Fabio). Milan: Springer-Verlag, 137-160. https://doi.org/10.1007/978-88-470-2568-4_9.
- Jacobson, Robin, Geron, Kim (2011). Unions and the politics of immigration. *Socialism and Democracy* 22(3), 105-122. <https://doi.org/10.1080/08854300802361620>.
- Janoski, Thomas, Alford, Robert, Hicks, Alexander, Schwartz, Mildred A. (2005). (eds.) *The Handbook of Political Sociology: States, Civil Societies, and Globalization*. Cambridge: Cambridge University Press.
- Japan Association for Refugees. <https://www.refugee.or.jp/en/refugee/>. (30/06/2021).

- Japan Federation of Bar Associations. *What is the JFBA?* <https://www.nichibenren.or.jp/en/about/us/profile.html>. (20/12/2021).
- Japan Institute for Labour Policy and Training (2019). *Databook of International Labour Statistics*.
- Jennissen, Roel (2007). Causality Chains in the International Migration Systems Approach. *Population Research and Policy Review* 26(4), 411-436. <https://doi.org/10.1007/s11113-007-9039-4>.
- Jessop, Robert (2002). *The Future of the Capitalist State*. Cambridge: Polity Press.
- Jiji.com (23 October, 2018). *Jimin, shinzairyū shikaku ni hantairon zokushutsu*. <https://www.jiji.-com/jc/article?k¼2018102200656&g=soc>. (11/10/2021).
- JILPT Statistical Information (November 29, 2019). *Main Labor Economic Indicators*.
- Johnson, Akilah, Buford, Talia (03 April, 2020). *Early Data Shows African Americans Have Contracted and Died of Coronavirus at an Alarming Rate*. ProPublica. https://www.propublica.org/article/early-data-shows-african-americans-have-contracted-and-died-of-coronavirus-at-an-alarming-rate?utm_source=pardot&utm_medium=email&utm_campaign=majorinvestigations. (15/11/2021).
- Johnson, Chalmers (1982). *MITI and the Japanese Miracle: The Growth of Industrial Policy, 1925–1975*. Stanford: Stanford University Press.
- Jonker-Hoffrén, Paul (2012). The Finnish Paper Workers' Union at a Crossroads: Labor Union Representativeness in a Changing Environment, 1980–2008. *Ph.D. thesis*. University of Turku, Turku.
- Kanji, Nishio (1990) The Danger of an Open Door Policy. *Japan Echo* 17(1), 51-56.
- Kanki, Chikako (2019). Legal Regulation of Unreasonable Treatment of Non-regular Employees in Japan. *Japan Labor Issues* 3(4), 3-14.
- Kashiwazaki, Chikako (2013). Incorporating Immigrants as Foreigners: Multicultural Politics in Japan. *Citizenship Studies* 17(1), 31-47. <https://doi.org/10.1080/13621025.2013.764216>.
- Kashiwazaki, Chikako (2016). Multicultural Discourse and Policies in Japan: An Assessment of Tabunka Kyōsei. *The Gakushuin Journal of International Studies* 3, 1-15.
- Kasza, Gregory J. (2018). Gerschenkron, Amsden, and Japan: The State in Late Development. *Japanese Journal of Political Science* 19(2), 146-172. <https://doi.org/10.1017/S1468109918000038>.

- Kaveevivitchai, Nithi (11 February, 2019). *Japan's new foreign worker policy faces challenges*. Bangkok Post. <https://www.bangkokpost.com/business/1627310/japans-new-foreign-worker-policy-faces-challenges>. (10/11/2021).
- Kawakami, Ikuo, Koizumi, Koichi, Robinson, Courtland, Sato, Yasunobu, Takizawa, Saburo, Yamagami, Susumu, Yamamoto, Satoshi (2009). *A Report on the Local Integration of Indo-Chinese Refugees and Displaced Persons in Japan*. Tōkyō: UNHCR.
- Keidanren (2009). 競争力人材の育成と確保に向けて . <http://www.keidanren.or.jp/japanese/policy/2009/036/index.html>. (10/11/2021).
- Keidanren (2018). *Basic Views on Accepting Foreign Workers*. https://www.keidanren.or.jp/en/policy/2018/086_outline.pdf. (29/10/2021).
- Kerr, Clark (1983) *The Future of Industrial Societies: Convergence or Continuing Diversity?* Cambridge, MA: Harvard University Press.
- Kerr, Clark, Dunlop, John T., Harbison, Frederick H., Myers, Charles A. (1960). *Industrialism and Industrial Man: The Problems of Labor and Management in Economic Growth*. Cambridge: Harvard University Press.
- Korpi, Walter (1983). *The Democratic Class Struggle*. London: Routledge & Kegan Paul.
- Korpi, Walter (1998). Power Resources Approach vs. Action and Conflict: On Causal and Intentional Explanations in the Study of Power. *Power Resource Theory and the Welfare State: A Critical Approach* (eds. O'Connor, Julia S., Olsen, Gregg M.). Toronto: University of Toronto Press, 37-65.
- Korpi, Walter (2006). Power resources and employer-centered approaches in explanations of welfare states and varieties of capitalism: protagonists, consenters, and antagonists. *World Politics* 58(2), 167-206. <https://doi.org/10.1353/wp.2006.0026>.
- Koudela, Pál (2019). Robots Instead of Immigrants: The Positive Feedback of Japanese Migration Policy on Social Isolation and Communication Problems. *Asia-Pacific Social Science Review* 19(1), 90-104.
- Krings, Torben (2010). Trade Unions and Migrant Labour in the "Global Age": New Alliances or Old Antagonisms? *Labour Migration in Europe. Migration, Minorities and Citizenship* (eds. Menz, Georg, Caviedes, Alexander A.). London: Palgrave Macmillan, 101-123. https://doi.org/10.1057/9780230292536_5.
- Kritz Mary M., Lim Lin Lean, Zlotnik Hania (1992). (eds.) *International Migration Systems: A Global Approach*. Oxford: Clarendon Press.

- Kubo Satoshi, Naito Hisashi, Takahashi Mina (14 August, 2018). *Imin wa damedaga—saichō gonen no zairyū shikaku*. Asahi Shimbun.
- Kurosawa, Koichi (01 October, 2021). *Statement on revision of the minimum wage*. http://www.zenroren.gr.jp/jp/english/2021/10/english211007_01.html. (05/11/2021).
- Kurosawa, Koichi (14 October, 2021). *Statement. Let us go to the polls to change politics to end neoliberal policies. On the occasion of the dissolution of the House of Representatives*. http://www.zenroren.gr.jp/jp/english/2021/10/english211015_01.html. (05/11/2021).
- Kuwahara, Yasuho (2004). Employment relations in Japan. *International and Comparative Employment Relations. Globalisation and the Developed Market Economies* (eds. Bamber, Greg J., Lansbury, Russell D., Wailes, Nick). Crows Nest, NSW: Allen & Unwin, 277-305 (4th edition).
- Le Garzantine (2011). *Economia*. Milano: Garzanti.
- Lebra, Takie Sugiyama (1984). *Japanese Women. Constraint and Fulfillment*. Honolulu: University of Hawaii Press.
- Lechevalier, Sébastien (2014). *The Great Transformation of Japanese Capitalism*. New York: Routledge.
- Lechner, Frank J. (2001). *Globalization theories: World-System Theory*. <https://web.archive.org/web/20130429010208/http://www.sociology.emory.edu/globalization/theories01.html>. (16/11/2021).
- Lie, John (2001). *Multiethnic Japan*. Cambridge, Mass: Harvard University Press.
- Lie, John (2003). The discourse of Japaneseness. *Japan and Global Migration: Foreign Workers and the Advent of a Multicultural Society* (eds. Douglass, Mike, Roberts, Glenda Susan). Honolulu: University of Hawaii Press, 70-90.
- Lie, John (2008). *Zainichi (Koreans in Japan): Diasporic Nationalism and Postcolonial Identity*. Berkeley: University of California Press.
- Lightman, Naomi (2018). A Care Convergence? Quantifying Wage Disparities for Migrant Care Workers Across Three Welfare Regimes. *LIS Working Paper Series No. 742*. <http://hdl.handle.net/10419/203028>.
- Lim, Lin Lean (1992). International Labour Movements: A Perspective on Economic Exchanges and Flows. *International Migration Systems: A Global Approach* (eds. Kritz Mary M., Lim Lin Lean, Zlotnik Hania). Oxford: Clarendon Press, 133-149.

- Liu-Farrer, Gracia (2009). Educationally Channeled International Labor Mobility: Contemporary Student Migration from China to Japan. *International Migration Review* 43(1), 178-204. <https://doi.org/10.1111/j.1747-7379.2008.01152.x>.
- Liu-Farrer, Gracia (2020). *Immigrant Japan: Mobility and Belonging in an Ethno-nationalist Society*. Ithaca, NY: Cornell University Press.
- Locke, Richard M., Rissing, Ben A., Pal, Timea (2013). Complements Or Substitutes? Private Codes, State Regulation and the Enforcement of Labour Standards in Global Supply Chains. *British Journal of Industrial Relations* 51(3), 519-552. <https://doi.org/10.1111/bjir.12003>.
- Machimura, Takashi (2000). Local Settlement Patterns of Foreign Workers in Greater Tokyo: Growing Diversity and Consequences. *Japan and Global Migration: Foreign Workers and the Advent of a Multicultural Society* (eds. Douglass, Mike, Roberts, Glenda Susan). Honolulu: University of Hawaii Press, 176-195.
- Magara, Hideko (2013). Introduction: two decades of structural reform and political change in Italy and Japan. *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan* (eds. Magara, Hideko, Sacchi, Stefano). Cheltenham: Edward Elgar Publishing Ltd., 1-24. <https://doi.org/10.4337/9780857932938.00006>.
- Magara, Hideko, Sacchi, Stefano (2013). (eds.) *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan*. Cheltenham: Edward Elgar Publishing Ltd. <https://doi.org/10.4337/9780857932938>.
- Mahon, Rianne, Anttonen, Anneli, Bergqvist, Christina, Brennan, Deborah, Hobson, Barbara (2012). Convergent care regimes? childcare arrangements in Australia, Canada, Finland and Sweden. *Journal of European Social Policy* 22(4), 419-431. <https://doi.org/10.1177/0958928712449776>.
- Marinelli, Francesca (2019). Attività sindacale e identità etnica: riflessioni sui possibili scenari futuri. *Giornale di diritto del lavoro e di relazioni industriali* 164(4), 673-694. <https://doi.org/10.3280/GDL2019-164004>.
- Marino, Stefania (2012). Trade union inclusion of migrant and ethnic minority workers: Comparing Italy and the Netherlands. *European Journal of Industrial Relations* 18(1), 5-20. <https://doi.org/10.1177/0959680111429755>.
- Marino, Stefania, Penninx, Rinus, Roosblad, Judith (2015). Trade unions, immigration and immigrants in Europe revisited: Unions' attitudes and actions under new conditions. *Comparative Migration Studies* 3(1), 1-16. <https://doi.org/10.1007/s40878-015-0003-x>.

- Marino, Stefania, Roosblad, Judith, Penninx, Rinus (2017). (eds.) *Trade unions and migrant workers: New contexts and challenges in Europe*. Geneva: ILERA Series; Cheltenham: Edward Elgar. <https://doi.org/10.4337/9781788114080>.
- Martin, Cathie Jo (2005). Beyond Bone Structure: Historical Institutionalism and the Style of Economic Growth. *Varieties of Capitalism, Varieties of Approaches* (ed. Coates, David). Basingtoke: Palgrave Macmillan, 47-62. https://doi.org/10.1057/9780230522725_3.
- Massey, Douglas S. (1999). International Migration at the Dawn of the Twenty-First Century: The Role of the State. *Population and Development Review* 25(2), 303-322. <https://doi.org/10.1111/j.1728-4457.1999.00303.x>.
- Massey, Douglas S., Arango, Joaquin, Hugo, Graeme, Kouaouci, Ali, Pellegrino, Adela, Taylor, Edward J. (1993). Theories of international migration: A review and appraisal. *Population and Development Review* 19(3), 431-466. <https://doi.org/10.2307/2938462>.
- Massey, Douglas S., Arango, Joaquin, Hugo, Graeme, Kouaouci, Ali, Pellegrino, Adela, Taylor, Edward J. (1998). *Worlds in motion: Understanding international migration at the end of the millennium*. Oxford, England: Clarendon Press.
- McCollum, David, Findlay, Allan (2015). 'Flexible' workers for 'flexible' jobs? The labour market function of A8 migrant labour in the UK. *Work, Employment and Society* 29(3), 427-443. <https://doi.org/10.1177/0950017014568137>.
- McGovern, Patrick (2007). Immigration, Labour Markets and Employment Relations: Problems and Prospects. *British Journal of Industrial Relations* 45(2), 217-235. <https://doi.org/10.1111/j.1467-8543.2007.00612.x>.
- Meardi, Guglielmo (2018). Economic Integration and State Responses: Change in European Industrial Relations since Maastricht. *British Journal of Industrial Relations*. 56(3) 631-655. <https://doi.org/10.1111/bjir.12307>.
- Menz, Georg (2009). *The Political Economy of Managed Migration: Nonstate Actors, Europeanization, and the Politics of Designing Migration Policies*. New York: Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780199533886.001.0001>.
- Menz, Georg (2010). Employers, Trade Unions, Varieties of Capitalism, and Labour Migration Policies. *Labour Migration in Europe. Migration, Minorities and Citizenship* (eds. Menz, Georg, Caviedes, Alexander A.). London: Palgrave Macmillan, 25-53. https://doi.org/10.1057/9780230292536_2.

- Migliavacca, Mauro, Naldini, Manuela (2018). Gender and Work-Family Balance in Familialist and Liberal Welfare Regimes: differences and Communality between the US, Australia, Japan and Italy. *Assumptions and Translation of Work and Family Research*, WFRN Conference Work and Family Researchers Network, June 21-23, Capital Hilton Washington, D.C.
- Migliavacca, Mauro, Naldini, Manuela (2018). Tra famiglia e lavoro, quattro sistemi a confronto. I casi di Stati Uniti, Australia, Italia e Giappone. *Italian Journal of Social Policy* 1, 23-47.
- Miglietta, Anna, Loera, Barbara (2021). Modern Forms of Populism and Social Policies: Personal Values, Populist Attitudes, and Ingroup Definitions in Support of Left-Wing and Right-Wing Welfare Policies in Italy. *Genealogy* 5(3): 60, 1-15. <https://doi.org/10.3390/genealogy5030060>.
- Migrantitorino.it (05 September, 2018). *Irregolari, sanatorie e rimpatri: qualche numero di sfondo*. <http://www.migrantitorino.it/?p=46795>. (20/10/2021).
- Milkman, Ruth, Bloom, Joshua, Narro, Victor (2010). (eds) *Working for Justice: The L.A. Model of Organizing and Advocacy*. Ithaca, NY: Cornell University Press.
- Ministry of Foreign Affairs of Japan (2021). <https://www.mofa.go.jp/index.html>. (11/10/2021).
- Ministry of Health, Labour and Welfare of Japan (2021). <https://www.mhlw.go.jp/>. (15/11/2021).
- Ministry of Internal Affairs and Communications of Japan (2021). <https://www.soumu.go.jp/>. (15/11/2021).
- Ministry of Justice of Japan (2019). *Heisei 30 nen ni okeru Nanmin Nintei Shasū nado ni tsuite*. http://www.moj.go.jp/nyuukokukanri/kouhou/nyuukokukanri03_00139.html. (10/11/2021).
- Ministry of Justice of Japan (2021). <http://www.moj.go.jp/isa/index.html>. (11/10/2021).
- Minkenberg, Michael (2000). The Renewal of the Radical Right: Between Modernity and Anti-Modernity. *Government and Opposition* 35(2), 170-188. <https://doi.org/10.1111/1477-7053.00022>.
- Mitchell, Jasmine (2019). Racism, Prejudice, and Democratization: The Westernization of Japan Under U.S. Occupation, 1945-52. *Discussion Paper*, Africana Studies Student Research Conference 3.

- Miyamoto, Tarō, Peng, Ito, Uzuhashi, Takafumi (2003). Nihongata Fukushi Kokka no Ichi to Dotai (The position and dynamics of the Japanese-style welfare state). *Tenkanki no Fukushi Kokka (The Japanese Version of Welfare States in Transition)* (ed. Esping-Andersen, Gøsta). Tōkyō: Waseda University Press, 295-340.
- Molina, Oscar, Rhodes, Martin (2006). Mixed Market Economies. *European Politics & Society* 5(1), 11-15.
- Mometti, Felice, Ricciardi, Maurizio (2011). *La normale eccezione. Lotte migranti in Italia*. Roma: Alegre.
- Mori, Hiromi (1997). *Immigration Policy and Foreign Workers in Japan*. New York: St. Martin's Press.
- Morris-Suzuki, Tessa (1994). *The Technological Transformation of Japan: From the Seventeenth to the 21st-century*. New York: Cambridge University Press.
- Mottura, Giovanni (2002). *Non solo braccia. Condizioni di lavoro e percorsi di inserimento sociale in un'area a economia diffusa*. Materiali di discussione 416. Dipartimento di Economia Politica: Università di Modena e Reggio Emilia.
- Muller, Thomas (1993). *Immigrants and the American City*. New York: New York University Press.
- Munz, Rainer, Ulrich, Ralf (1997). Changing Patterns of Immigration to Germany, 1943-1993. *Migration Past, Migration Future* (eds. Bade, Klaus J., Weiner, Myron). Providence, ME: Berghahn Books, 40-65.
- Nakai, Masayuki (2020). Employment Trends and Employment/Labor Measures of Japan Affected by Spread of COVID-19. *Japan Labor Issues* 4(24), 15-23.
- Nakamura, Masao (1993). Japanese Industrial Relations and International Business Environment. *North American Journal of Economics & Finance* 4(2), 225-251. [https://doi.org/10.1016/1062-9408\(93\)90018-Z](https://doi.org/10.1016/1062-9408(93)90018-Z).
- Nakane, Chie (1970). *Japanese Society*. Berkeley: University of California Press.
- Nakanishi, Hiroaki (2018). *Chairman Nakanishi's Statements and Comments at His Press Conference*. <https://www.keidanren.or.jp/en/speech/kaiken/2018/0611.html>. (05/11/2021).
- National Institute of Population and Social Security Research (2017). *Population Projections for Japan (2017): 2016 to 2065*. http://www.ipss.go.jp/pp-zenkoku/e/zenkoku_e2017/pp29_summary.pdf. (14/10/2021).

- Natter, Katharina, Czaika, Mathias, de Haas, Hein (2020). Political party ideology and immigration policy reform: an empirical enquiry. *Political Research Exchange* 2(1). <https://doi.org/10.1080/2474736X.2020.1735255>.
- Neary, Ian (2009). Burakumin in contemporary Japan. *Japan's Minorities: The Illusion of Homogeneity* (ed. Michael Weiner). London; New York: Routledge, 59-82.
- Negrelli, Serafino, Sheldon, Peter (2004). Employment Relations in Italy. *International and Comparative Employment Relations. Globalisation and the Developed Market Economies* (eds. Bamber, Greg J., Lansbury, Russell D., Wailes, Nick). Crows Nest, NSW: Allen & Unwin, 146-175 (4th edition).
- Newell, William H. (2001). A Theory of Interdisciplinary Studies. *Issues in Integrative Studies* 19(1), 1-25.
- Nippon.com (31 March, 2021). *Foreign Residents in Japan Decrease for 1st Time in 8 Yrs.* <https://www.nippon.com/en/news/yjj2021033101127/foreign-residents-in-japan-decrease-for-1st-time-in-8-yrs.html>. (03/07/2021).
- Norris, Pippa, Inglehart, Ronald (2019). *Cultural Backlash: Trump, Brexit, and Authoritarian Populism*. Cambridge: Cambridge University Press.
- Ochiai, Emiko (2010). Care regimes in Asia: varieties of familialism in six East and Southeast Asian societies. Presented at Max Planck Institute for Demographic Research.
- Ochiai, Emiko (2011). Unsustainable societies: the failure of familialism in East Asia's compressed modernity. *Historical Social Research* 36(2), 219-245. <https://doi.org/10.12759/hsr.36.2011.2.219-245>.
- OECD (2001). *An Interpretative Guide to the OECD Social Expenditure Database (SOCX)*, <https://stats.oecd.org/glossary/detail.asp?ID=28>. (15/11/2021).
- OECD (2008). *Growing Unequal?: Income Distribution and Poverty in OECD Countries. Country note: Japan.* <http://www.oecd.org/dataoecd/45/57/41527303.pdf>. (14/10/2021).
- OECD (2017). *Enhancing the Contributions of SMEs in a Global and Digitalised Economy.* <https://www.oecd.org/industry/C-MIN-2017-8-EN.pdf#:~:text=It%20should%20be%20noted%20that%20a%20standard%20international,countries%2C%20noting%20that%20some%20countries%20use%20different%20conventions>. (15/11/2021).
- OECD (2017). *OECD Employment Outlook 2017*. Paris: OECD Publishing. https://doi.org/10.1787/empl_outlook-2017-en. (16/07/2021).

- OECD (2017). *International Migration Outlook*. Paris: Oecd Publishing. https://doi.org/10.1787/migr_outlook-2017-en. (16/07/2021).
- OECD (2019). *Population with tertiary education (indicator)*. <https://data.oecd.org/eduatt/population-with-tertiary-education.htm>. <https://doi.org/10.1787/0b8f90e9-en>. (24/01/2022).
- OECD (2019). *Society at a Glance 2019: OECD Social Indicators*. OECD Publishing, Paris. https://doi.org/10.1787/soc_glance-2019-en. (14/10/2021).
- OECD (2020). *Elderly population (indicator)*. <https://data.oecd.org/pop/elderly-population.htm#indicator-chart>. (08/12/2021).
- OECD (2020). *Financing SMEs and Entrepreneurs 2020. An OECD Scoreboard. Japan*. <https://www.oecd-ilibrary.org/sites/5989eb3a-en/index.html?itemId=/content/component/5989eb3a-en>. <https://doi.org/10.1787/061fe03d-en>. (18/11/2021).
- OECD (2021). *Doctors (indicator)*. <https://data.oecd.org/healthres/doctors.htm>. <https://doi.org/10.1787/4355e1ec-en>. (05/11/2021).
- OECD (2021). *Income inequality (indicator)*. https://www.oecd-ilibrary.org/social-issues-migration-health/income-inequality/indicator/english_459aa7f1-en. <https://doi.org/10.1787/459aa7f1-en>. (31/08/2021).
- OECD (2021). *International Migration Database*. <https://stats.oecd.org/Index.aspx?DataSetCode=MIG>. (31/08/2021).
- OECD (2021). *Poverty rate (indicator)*. <https://data.oecd.org/inequality/poverty-rate.htm>. <https://doi.org/10.1787/0fe1315d-en>. (02/09/2021).
- OECD.Stat (2021). <https://stats.oecd.org/>. (18/11/2021).
- OECD.Stat (2021). *Employment rates by place of birth and educational attainment (25-64)*. https://stats.oecd.org/Index.aspx?DataSetCode=MIG_EMP_EDUCATION. (15/11/2021).
- OECD.Stat (2021). *LFS by sex and age - indicators: Employment-population ratios*. <https://stats.oecd.org/index.aspx?queryid=64196#>. (15/11/2021).
- Oesch, Daniel (2013). *Occupational Change in Europe: How Technology and Education Transform the Job Structure*. Oxford: Oxford University Press.
- Ogino, Noboru (2021). What Is Shunto? *Japan Labor Issues* 5(28), 18-21.
- OHCHR (2022). *Migrant worker*. European Commission. Migration and Home Affairs. https://ec.europa.eu/home-affairs/pages/glossary/migrant-worker_en. (26/01/2022).

- Ohmae, Kenichi (1990). *The Borderless World: Power and Strategy in the Interlinked Economy*. New York: Harper Business.
- O'Rourke, Kevin H., Williamson, Jeffrey G. (2000). When Did Globalization Begin? *Working Paper* No. 7632. National Bureau of Economic Research. <https://doi.org/10.3386/w7632>.
- Orrù, Marco, Biggart, Nicole W., Hamilton, Gary G. (1991). Isomorfismo organizzativo in Asia Orientale. *Il neoistituzionalismo nell'analisi organizzativa* (eds. Powell, Walter W., DiMaggio, Paul J.). Chicago: The University of Chicago Press, 483-519.
- Overbeek, Henk W. (2003). (ed.) *The political economy of European employment: European integration and the transnationalization of the (un)employment question*. London: Routledge.
- Palier, Bruno, Thelen, Kathleen (2010). Institutionalizing Dualism: Complementarities and Change in France and Germany. *Politics and Society* 38(1), 119-148. <https://doi.org/10.1177/0032329209357888>.
- Pascucci, Paolo (2015). *Breve storia del movimento sindacale nel secondo dopoguerra (1943-1995)*.
- Peck, Jamie (1996). *Work-Place: The Social Regulation of Labor Market*. New York: Guilford Press.
- Pedersini, Roberto (2007). *Industrial relations in the EU, Japan, US and other global economies, 2005–2006*. European Foundation for the Improvement of Living and Working Conditions.
- Pempel, T.J. (1990). (ed.) *Uncommon Democracies: The One-party Dominant Regimes*. Ithaca, NY: Cornell University Press.
- Penn, Michael (05 January, 2022). *The Decline of the Soft Power Nation*. Shingetsu News Agency. <https://shingetsunewsagency.com/2022/01/05/the-decline-of-the-soft-power-nation/>. (05/01/2022).
- Penninx, Rinus, Roosblad, Judith (2000). (eds) *Trade Unions, Immigration, and Immigrants in Europe, 1960–1993*. New York: Berghahn Books.
- Perez, Sofia (2000). From Decentralization to Reorganization: Explaining the Return to National Bargaining in Italy and Spain. *Comparative Politics* 32(4), 437-458.
- Perlmutter, Ted (1996). Bringing Parties Back In: Comments on 'Modes of Immigration Politics in Liberal Democratic Societies'. *International Migration Review* 30(1): 375-388. <https://doi.org/10.1177/019791839603000141>.

- Perrons, Diane (2004). Equity and Representation in the New Economy. *Union Organization and Activity* (eds. Kelly, John, Willman, Paul). London: Routledge, 51-72.
- Peters, John (2011). The Rise of Finance and the Decline of Organised Labour in the Advanced Capitalist Countries. *New Political Economy* 16(1), 73-99. <https://doi.org/10.1080/13563461003789746>.
- Peters, Margaret E. (2015). Open Trade, Closed Borders Immigration in the Era of Globalization. *World Politics* 67(1), 114-154. <https://doi.org/10.1017/S0043887114000331>.
- Piore, Michael Joseph (1979). *Birds of Passage: Migrant Labor and Industrial Societies*, New York: Cambridge University Press.
- Pontusson, Jonas (2005). Varieties and Commonalities of Capitalism. *Varieties of Capitalism, Varieties of Approaches* (ed. Coates, David). Basingstoke: Palgrave Macmillan, 163-188. https://doi.org/10.1057/9780230522725_9.
- Pugliese, Enrico (2002) *L'Italia tra Migrazioni Internazionali e Migrazioni Interne*. Bologna: Il Mulino.
- Raess, Damian, Burgoon, Brian (2015). Flexible Work and Immigration in Europe. *British Journal of Industrial Relations* 53(1), 94-111. <https://doi.org/10.1111/bjir.12022>.
- Raikhola, Pushkar Singh, Kuroki, Yasuhiro (2010). Aging and Elderly Care Practice in Japan: Main Issues, Policy and Program Perspective; What Lessons can be Learned from Japanese Experiences. *Dhaulagiri Journal of Sociology and Anthropology* 3, 41-82. <https://doi.org/10.3126/dsaj.v3i0.2781>.
- Ranci, Costanzo, Pavolini, Emmanuele (2015). *Le politiche di welfare*, Bologna: Il Mulino.
- Rebeck, Marcus (2005). *The Japanese Employment System: Adapting to a New Economic Environment*. Oxford, NY: Oxford University Press.
- Reischauer, Edwin O., Marius, Jansen B. (1999). *The Japanese Today: Change and Continuity*. Cambridge, MA; London, UK: Belknap Press.
- Rengō (2010). *JTUC-RENGO'S Priority Policies for FY2011*.
- Rengō (2016). *2016-2017 Action Policies*. http://www.jtuc-rengo.org/about/data/RENGO_Action_Policies_2016-2017.pdf. (20/11/2021).
- Rengō (2017). 外国人労働者の受入れ政策に関する連合の考え方. <https://www.jtuc-rengo.or.jp/activity/roudou/data/20170119.pdf?7063>. (30/10/2021).

- Rengō (2018). 「外国人材の受入れに関する新たな在留資格の創設」 に対する当面の取り組み . https://www.jtuc-rengo.or.jp/activity/roudou/data/zairyushikaku_torikumi.pdf?7063. (30/10/2021).
- Rengō (2018). 外国人労働者の受入れに関する意識調査 2018. <https://www.jtuc-rengo.or.jp/info/chousa/data/20181018-02.pdf?40>. (30/10/2021).
- Reuters (15 October, 2021). *Japanese coalition partner raises doubt about higher defense spending*. The Japan Times. <https://www.japantimes.co.jp/news/2021/10/15/national/ldp-komeito-defense/>. (05/11/2021).
- Reyneri, Emilio (2003). Immigration and the Underground Economy in New Receiving South European Countries: Manifold Negative Effects, Manifold Deep-Rooted Causes. *International Review of Sociology* 13(1), 117-143. <https://doi.org/10.1080/0390670032000087023>.
- Roberts, Glenda Susan (2013). Vocalizing the ‘I’ Word: Proposals and Initiatives on Immigration to Japan from the LDP and Beyond. *Journal of Asia-Pacifc Studies* 19, 201-219.
- Roberts, Glenda Susan (2018). An Immigration Policy by Any Other Name: Semantics of Immigration to Japan. *Social Science Japan Journal* 21(1), 89-102. <https://doi.org/10.1093/ssjj/jyx033>.
- Rogers, Rosemarie (1985). (ed.) *Guests Come to Stay*. Boulder, CO: Westview Press.
- Rostow, Walt Whitman (1960). *The Stages of Economic Growth: A Non-Communist Manifesto*. London: Cambridge University Press.
- Rubin, Herbert J., Rubin, Irene (2012). *Qualitative Interviewing: The Art of Hearing Data*. London: Sage (3rd edition).
- Ruggie, John Gerard (1982). International regimes, transactions and change: embedded liberalism in the postwar economic order. *International Organization* 36(2), 379-415. <https://doi.org/10.1017/S0020818300018993>.
- Ruhs, Martin, Anderson, Bridget (2010). *Who Needs Migrant Workers? Labour Shortages, Immigration, and Public Policy*. Oxford: Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780199580590.001.0001>.
- Russell, John G. (2009). *The Other Other: The Black Presence in the Japanese Experience*. Japan’s Minorities: The Illusion of Homogeneity (ed. Weiner, Michael). Sheffield: Routledge, 84-115 (2nd edition).

- Sacchi, Stefano (2013). Italy's labour policy and policy making in the crisis: from distributive coalitions to the shadow of hierarchy. *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan* (eds. Magara, Hideko, Sacchi, Stefano). Cheltenham: Edward Elgar Publishing Ltd., 192-214. <https://doi.org/10.4337/9780857932938.00014>.
- Salt, John (1981). International Labor Migration in Western Europe: A Geographical Review. *International Migration Systems: A Global Approach* (eds. Kritz, Mary M., Keely, Charles B., Tomasi, Silvano M.). New York: Center for Migration Studies, 133-157.
- Sapelli, Giulio (1995). *Southern Europe Since 1945: Tradition and Modernity in Portugal, Spain, Italy, Greece and Turkey*. London: Longman.
- Saraceno, Chiara (2016). Varieties of Familialism: Comparing Four Southern European and East Asian Welfare Regimes. *Journal of European Social Policy* 26(4), 314-326. <https://doi.org/10.1177/0958928716657275>.
- Sartori, Giovanni (1976). *Parties and Party Systems: A Framework of Analysis*. New York: Cambridge University Press.
- Sassen, Saskia (1991). *The Global City: New York, London, Tokyo*. Princeton, New Jersey: Princeton University Press.
- Sassen, Saskia (1993). Economic Internationalization: The New Migration in Japan and the United States. *International Migration* 31(1), 73-102. <https://doi.org/10.1111/j.1468-2435.1993.tb00719.x>.
- Sassen, Saskia (1996). *Losing control: sovereignty in an age of globalization*. New York: Columbia University Press.
- Sassen, Saskia (1999). Beyond Sovereignty: De-facto Transnationalism in Immigration Policy. *European Journal of Migration and Law* 1(2), 177-198. <https://doi.org/10.1163/15718169920958513>.
- Sassen, Saskia (2001). *The Global City: New York, London, Tokyo*. Princeton: Princeton University Press.
- Savino, Mario (January, 2022). *Tornare a Tampere? L'urgenza di un dibattito sui canali regolari di ingresso*. ADiM Blog. Editorial. http://www.adimblog.com/wp-content/uploads/2022/02/SodaPDF-processed-Savino-ADiM-Blog-Editoriale_Gennaio-2022_3.2.pdf. (07/02/2022).

- Schaeede, Ulrike (2020). *The Business Reinvention of Japan. How to Make Sense of the New Japan and Why It Matters*. Stanford University Press. <https://doi.org/10.1515/9781503612365-001>.
- Schain, Martin A. (2006). The extreme-right and immigration policy-making: Measuring direct and indirect. *West European Politics* 29(2), 270-289. <https://doi.org/10.1080/01402380500512619>.
- Schmidt, Vivien A. (2002). *The Futures of European Capitalism*. Oxford/New York: Oxford University Press. <https://doi.org/10.1093/0199253684.001.0001>.
- Schmidt, Vivien A., Thatcher, Mark (2013). Theorizing ideational continuity: The resilience of neo-liberal ideas in Europe. *Resilient Liberalism in Europe's Political Economy* (eds. Schmidt, Vivien A., Thatcher, Mark). Cambridge: Cambridge University Press, 1-50. <https://doi.org/10.1017/CBO9781139857086.002>.
- Scholte, Jan Aart (2000). *Globalization: A Critical Introduction*. London: Macmillan.
- Schoorl, Jeanette (1995). Determinants of international migration: Theoretical approaches and implications for survey research. *Causes of international migration* (eds. Van der Erf, Rob, Heering, Liesbeth). Luxemburg: Office for Official Publications of the European Communities, 3-14.
- Schröder, Martin (2009). Integrating Welfare and Production Typologies: How Refinements of the Varieties of Capitalism Approach Call for a Combination of Welfare Typologies. *Journal of Social Policy* 38(1), 19-43. <https://doi.org/10.1017/S0047279408002535>.
- Schulz, Martin (2015). Debt and Growth Crises in Ageing Societies: Japan and Italy. Fujitsu Research Institute Economic Research Institute (*Fujitsu sōken keizaikenkyūsho*), *Research Report* 423(1), 3-31.
- Schulzek, Nina (2012) The impact of welfare systems on immigration: An analysis of welfare magnets as a pull-factor for asylum seekers and labour migrants. *Working Papers* No. 2012/02. LSE Migration Studies Unit.
- Scruggs, Lyle, Allan, James (2006). Welfare-state decommodification in 18 OECD countries: a replication and revision. *Journal of European Social Policy* 16(1), 55-72. <https://doi.org/10.1177/0958928706059833>.
- Sellek, Yoko (1996). Female Foreign Migrant Workers in Japan: working for the Yen. *Japan Forum* 8(2), 159-175. <https://doi.org/10.1080/09555809608721567>.

- Shalal, Andrea, Lawder, David (23 March, 2020). *IMF sees pandemic causing global recession in 2020, recovery in 2021*. Reuters. <https://www.reuters.com/article/us-health-coronavirus-imf/imf-sees-pandemic-causing-global-recession-in-2020-recovery-in-2021-idUSKBN21A33O>. (15/11/2021).
- Shinkawa, Toshimitsu (2005). *Nihongata Fukushi Rejimu no Hatten to Henyo (The Development and Transformation of the Japanese-style Welfare Regime)*. Kyōto: Minerva Shobo.
- Shinkawa, Toshimitsu (2013). Beyond familialism? Welfare regime transformation in Japan. *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan* (eds. Magara, Hideko, Sacchi, Stefano). Cheltenham: Edward Elgar Publishing Ltd., 171-191. <https://doi.org/10.4337/9780857932938.00013>.
- Shiobara, Yoshikazu (2020). Genealogy of tabunka kyōsei: A Critical Analysis of the Reformation of the Multicultural Co-living Discourse in Japan. *International Journal of Japanese Sociology* 29(1), 22-38. <https://doi.org/10.1111/ijjs.12109>.
- Shipper, Apichai Wongsod (2008). *Fighting for Foreigners: Immigration and Its Impact on Japanese Democracy*. Ithaca, NY: Cornell University Press.
- Sides, John, Citrin, Jack (2007). European Opinion about Immigration: The Role of Identities, Interests and Information. *British Journal of Political Science* 37(3), 477-504. <https://doi.org/10.1017/s0007123407000257>.
- Simonazzi, Annamaria (2009). Care Regimes and National Employment Models. *Cambridge Journal of Economics* 33(2), 211-232. <https://doi.org/10.1093/cje/ben043>.
- Sniderman, Paul M., Hagendoorn, Louk, Prior, Markus (2004). Predisposing Factors and Situational Triggers: Exclusionary Reactions to Immigrant Minorities. *American Political Science Review* 98(1), 35-49. <https://doi.org/10.1017/s000305540400>.
- Spencer, Steven A. (1992). Illegal Migrant Laborers in Japan. *International Migration Review* 26(3), 754-786. <https://doi.org/10.1177/019791839202600302>.
- Standing, Guy (2009). *Work After Globalization: Building Occupational Citizenship*. Cheltenham: Edward Elgar.
- Statham, Paul, Geddes, Andrew (2006). Elites and the 'Organised Public': Who Drives British Immigration Politics and in Which Direction? *West European Politics* 29(2), 248-269.

- Statistics Bureau. Ministry of Internal Affairs and Communications of Japan (2019). *Japan Statistical Yearbook 2019*. <https://www.stat.go.jp/english/data/nenkan/68nenkan/index.html>. (12/10/2021).
- Statistics Bureau. Ministry of Internal Affairs and Communications of Japan (2021). *Japan Statistical Yearbook 2021*. <http://www.stat.go.jp/english/data/nenkan/70nenkan/index.html>. (12/10/2021).
- Statistics of Japan (2021). 在留外国人統計（旧登録外国人統計）. <https://www.e-stat.go.jp/stat-search/files?page=1&layout=datalist&toukei=00250012&tstat=000001018034&cycle=1&year=20200&month=12040606&tclass1=000001060399&tclass2val=0>. (12/10/2021).
- Steven, Rob (1983). *Classes in Contemporary Japan*. New York: Cambridge University Press.
- Storz, Cornelia, Amable, Bruno, Casper, Steven and Lechevalier, Sébastien (2013). Bringing Asia into the comparative capitalism perspective. *Socio-Economic Review* 11(2), 217-232. <https://doi.org/10.1093/ser/mwt004>.
- Streeck, Wolfgang (2009). *Re-Forming Capitalism: Institutional Change in the German Political Economy*. Oxford: Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780199573981.001.0001>.
- Strozza, Salvatore, Venturini, Alessandra (2002). Italy is No Longer a Country of Emigration: Foreigners in Italy, How Many, Where They Come From and What They Do. *Migration Policy and the Economy: International Experiences* (eds. Rotte, Ralph, Stein, Peter). Munich: Hanns-Seidel-Stiftung, 263-280. <http://hdl.handle.net/11588/176320>.
- Sugiyama, Satoshi (31 December, 2018). *Japan's denial of immigration reality echoes Germany's experience with 'guest workers'*. The Japan Times. <https://www.japantimes.co.jp/news/2018/12/31/national/japans-denial-immigration-reality-echoes-germanys-experience-guest-workers/>. (16/11/2021).
- Suzuki, Hiromasa (2013). *Japanese Industrial Relations from an International Perspective*.
- Suzuki, Hiromasa, Kubo, Katsuyuki, Ogura, Kazuya (2016). Employment relations in Japan. *International and Comparative Employment Relations. National Regulations, Global Changes* (eds. Bamber, Greg J., Lansbury, Russell D., Wailes, Nick, Wright, Chris F.). London: Routledge (6th edition). <https://doi.org/10.4324/9781003116158-10>.

- Suzuki, Motoshi (2013). Japan's structural reform in the age of economic globalization: the politics of coordination and miscoordination. *The Politics of Structural Reforms: Social and Industrial Policy Change in Italy and Japan* (eds. Magara, Hideko, Sacchi, Stefano). Cheltenham: Edward Elgar Publishing Ltd., 84-102. <https://doi.org/10.4337/9780857932938.00009>.
- Tamamura, Hiromi (2002). The Actual State and Effect of Privatization in Japan. *East Asia Competition Policy Forum*, 1-14.
- Tanaka, Takuji (2019). Japanese Welfare State in Comparative Perspective: An Overview. *Hitotsubashi Bulletin of Social Sciences* 11, 17-31. <https://doi.org/10.15057/30351>.
- Tanno, Kiyoto (2020). The Economic Crisis and Foreign Workers in Japan: Why Does Japan Treat Migrant Workers as Second Class Citizens? *Japan Labor Review* 7(3), 109-126.
- Taylor, K., Bursch, N. (2004) English for Non-English speakers in the Food Manufacturing sector. *East Midlands Development Agency*. Unpublished.
- Teitelbaum, Michael S., Russell Sharon S. (1994). International Migration, Fertility, and Development. *Population and Development: Old Debates, New Conclusions* (ed. Robert Cassen). New Brunswick: Transaction Publishers, 229-252.
- Terlouw, Cornelis Peter (1992). *The regional geography of the world-system: external arena, periphery, semiperiphery, core*. Utrecht: KNAG.
- Tezuka, Kazuaki (1992). The Foreign Worker Problem in Japan. *Japanese Economic Studies* 21(1), 3-38. <https://doi.org/10.2753/jes1097-203x21013>.
- The Yomiuri Shimbun (28 March, 2021). *Number of "specified skilled" foreign workers up modestly*.
- Thelen, Kathleen (2001). Varieties of Labor Politics in the Developed Democracies. *Varieties of Capitalism: The Institutional Foundations of Comparative Advantage* (eds. Hall, Peter A., Soskice, David). Oxford: Oxford University Press, 71-103. <https://doi.org/10.1093/0199247757.003.0002>.
- Thelen, Kathleen (2004). *How Institutions Evolve: The Political Economy of Skills in Germany, Britain, the United States and Japan*. Cambridge: Cambridge University Press.
- Thelen, Kathleen, Kume, Ikue (1999). The Effects of Globalization on Labor Revisited: Lessons from Germany and Japan. *Politics & Society* 27(4), 477-505. <https://doi.org/10.1177/0032329299027004002>.

- Thelen, Kathleen, Kume, Ikue (1999). The Rise of Nonmarket Training Regimes: Germany and Japan Compared. *The Journal of Japanese Studies* 25(1), 33-64. <https://doi.org/10.2307/133353>.
- Thelen, Kathleen, Kume, Ikue (2006). Coordination as a Political Problem in Coordinatet Market Economies. *Governance* 19(1), 11-42. <http://dx.doi.org/10.1111/j.1468-0491.2006.00302.x>.
- Thelen, Kathleen, van Wijnbergen, Christa (2001). *The Paradox of Globalization: Turning the Tables on Labor and Capital in German Industrial Relations*. Evanston, Ill.: Northwestern University.
- Tiglao-Torres, Amaryllis (1993). Features of the Migration of Men and Women in the Philippines. *Proceedings from the International Colloquium "Migration, Development and Gender in the ASEAN Region"* (ed. Ariffin, Jamilah). Kuala Lumpur: University of Malaysia, 67-114.
- Tolliday, Steven, Yonemitsu, Yasushi (2007). Microfirms and Industrial Districts in Japan: The Dynamics of the Arita Ceramic-Ware Industry in the Twentieth Century. *The Journal of Japanese Studies* 33(1), 29-66. <https://doi.org/10.1353/jjs.2007.0036>.
- Tolliday, Steven, Zeitlin, Jonathan (1991). Conclusion. National models and international variations in labour management and employer organization. *The Power to Manage?: Employers and Industrial Relations in Comparative-Historical Perspective* (eds. Tolliday, Steven, Zeitlin, Jonathan). New York: Routledge, 238-299.
- Tolliday, Steven, Zeitlin, Jonathan (1991). Introduction Employers and industrial relations between theory and history. *The Power to Manage?: Employers and Industrial Relations in Comparative-Historical Perspective* (eds. Tolliday, Steven, Zeitlin, Jonathan). New York: Routledge, 1-27.
- Tolliday, Steven, Zeitlin, Jonathan (1991). (eds.) *The Power to Manage?: Employers and Industrial Relations in Comparative-Historical Perspective*. New York: Routledge.
- Toner, Phillip, Woolley, Richard (2008). Temporary Migration and Skills Formation in the Trades: A Provisional Assessment. *People and Place* 16(3), 47-57.
- Toyonaga, Atsushi (2021). *About us. Message from Chairman / CEO*. SME SUPPORT JAPAN. <https://www.smrj.go.jp/english/about/>. (18/11/2021).
- Treccani. Istituto della Enciclopedia Italiana (2022). *Badante*. <https://www.treccani.it/vocabolario/badante/>. (22/01/2022).

- Treccani. Istituto della Enciclopedia Italiana (2022). *Caporalato*. <https://www.treccani.it/vocabolario/caporalato/>. (22/01/2022).
- Tsuda, Takeyuki (1998). The Stigma of Ethnic Difference: The Structure of Prejudice and 'Discrimination' toward Japan's New Immigrant Minority. *The Journal of Japanese Studies* 24(2), 317-359. <https://doi.org/10.2307/133237>.
- UNHCR Master Glossary of Terms (2022). *Economic migrant*. European Commission. Migration and Home Affairs. https://ec.europa.eu/home-affairs/pages/glossary/economic-migrant_en. (26/01/2022).
- Urano N., Sasakawa S., Nakazaki T. (28 November, 2018). *Kūso na tōben, gōin tsūka*. Asahi Shimbun.
- Urry, John (2000). *Sociology beyond Societies: Mobilities for the Twenty-First Century*. New York: Routledge.
- Urry, John (2007). *Mobilities*. Cambridge: Polity Press.
- USA Social Security Administration (2018). *Social Security Program Programs Throughout the World: Asia and the Pacific*. <https://www.ssa.gov/policy/docs/progdesc/ssptw/>. (15/11/2021).
- Uscher-Pines, Lori, Duggan, Patrick S., Garron, Joshua P., Karron, Ruth A., Faden, Ruth F. (2007). Planning for an Influenza Pandemic: Social Justice and Disadvantaged Groups. *The Hastings Center Report* 37(4), 32-39. <https://doi.org/10.1353/hcr.2007.0064>.
- Utomi, Awele (2020). Global health equity. COVID-19 highlights a need for ethical improvements. *Voices in Bioethics* 6. <https://doi.org/10.7916/vib.v6i.6358>.
- Uzuhashi, Takafumi (2003). Japanese Model of Welfare State: How it was changed throughout "the lost decade" of the 1990's?. *The Japanese Journal of Social Security Policy* 2(2), 1-14.
- Van Hooren, Franca J. (2012). Varieties of Migrant Care Work: Comparing Patterns of Migrant Labour in Social Care. *Journal of European Social Policy* 22(2), 133-147. <https://doi.org/10.1177/0958928711433654>.
- Veblen, Thorsten (1915). The Opportunity of Japan. *The Journal of Race Development* 6(1), 23-38.
- Vilog, Ron Bridget T., Arroyo, Ma. Keren Happuch D., Raquinio, Tezla Gael G. (2020). Empowerment issues in Japan's care industry: Narratives of Filipino nurses and care workers under the Economic Partnership Agreement (EPA) labour scheme. *International Journal of Asia Pacific Studies* 16(1), 39-69. <https://doi.org/10.21315/ijaps2020.16.1.2>.

- Vogt, Gabriele (2009): An Invisible Policy Shift: International Health-Care Migration to Japan. *APSA 2009 Toronto Meeting Paper*.
- Vogt, Gabriele (2013). When the Leading Goose Gets Lost: Japan's Demographic Change and the Non-Reform of its Migration Policy. *Asian Studies: Journal of Critical Perspectives on Asia* 49(2), 14-44.
- Vranken, Jan (1990). Industrial Rights. *The Political Rights of Migrant Workers in Western Europe* (ed. Layton-Henry, Zig). London: Sage, 47-73.
- Wade, Robert (1996). Globalisation and Its Limits: Reports of the Death of the National Economy Are Greatly Exaggerated. *National Diversity and Global Capitalism* (eds. Berger, Suzanne, Dore, Ronald Philip). Ithaca, NY: Cornell University Press, 29-59.
- Wallerstein, Immanuel (1974). *The Modern World-System: Capitalist Agriculture and the Origins of the European World-Economy in the Sixteenth Century*. New York, Academic Press.
- Wallerstein, Immanuel (1976). Semi-Peripheral Countries and The Contemporary World Crisis. *Theory and Society* 3(4), 461-483.
- Wallerstein, Immanuel (2004). *World-systems Analysis. World System History* (ed. Modelski, George). Encyclopedia of Life Support Systems (EOLSS), Developed under the Auspices of the UNESCO, Oxford, UK: Eolss Publishers. <http://www.eolss.net/ebooks/Sample%20Chapters/C04/E6-94-01.pdf>. (16/11/2021).
- Watanabe, Hiroaki Richards (2014). *Labour Market Deregulation in Japan and Italy. Worker Protection under Neoliberal Globalisation*. London: Routledge. <https://doi.org/10.4324/9781315776163>.
- Watanabe, Hiroaki Richards (2015). Labour Market Dualism and Diversification in Japan. *British Journal of Industrial Relations* 56(3), 579-602. <https://doi.org/10.1111/bjir.12258>
- Watanabe, Hiroaki Richard (2015). Neoliberal reform for greater competitiveness: labour market deregulation in Japan and Italy. *Industrial Relations Journal* 46(1), 54–76. <https://doi.org/10.1111/irj.12084>.
- Watanabe, Hiroaki Richard (2018). Labour Market Dualism and Diversification in Japan. *British Journal of Industrial Relations* 56(3), 579-602. <https://doi.org/10.1111/bjir.12258>.
- Watanabe, Toshio (1990). A Flawed Approach to Foreign Labour. *Japan Echo* 17(1), 45-50.
- Watts, Julie R. (2002). *Immigration Policy and the Challenge of Globalization: Unions and Employers in Unlikely Alliance*. Ithaca, NY: Cornell University Press.
- Weber, Max (1978). *Economy and Society*. Berkeley: University of California Press.

- Weiner, Michael (2003). Japan in the Age of Migration. *Japan and Global Migration: Foreign Workers and the Advent of a Multicultural Society* (eds. Douglass, Mike, Roberts, Glenda Susan). Honolulu: University of Hawaii Press, 52-59.
- Weiner, Myron (1995). *The Global Migration Crisis: Challenge to States and to Human Rights*. New York: Harper Collins.
- Whitley, Richard (1999). *Divergent Capitalisms. The Social Structuring and Change of Business Systems*. Oxford: Oxford University Press.
- Whittaker, Hugh D. (1997). *Small Firms in the Japanese Economy*. New York: Cambridge University Press.
- Williams, Fiona (2012). Converging variations in migrant care work in Europe. *Journal of European Social Policy* 22(4), 363-376. <https://doi.org/10.1177/0958928712449771>.
- Witt, Michael A., Jackson, Gregory (2016). Varieties of Capitalism and institutional comparative advantage: A test and reinterpretation. *Journal of International Business Studies* 47, 778-806. <https://doi.org/10.1057/s41267-016-0001-8>.
- World Health Organization (01 June, 2020). *Coronavirus disease (COVID-19). Situation Report – 133*. https://www.who.int/docs/default-source/coronaviruse/situation-reports/20200601-covid-19-sitrep-133.pdf?sfvrsn=9a56f2ac_4. (15/11/2021).
- Wren, Anne (2013). *The Political Economy of the Service Transition*. Oxford: Oxford University Press.
- Wright, Chris F. (2012). Immigration policy and market institutions in liberal market economies. *Industrial Relations Journal* 43(2), 110-136. <https://doi.org/10.1111/j.1468-2338.2012.00664.x>.
- Wright, Erik Olin (1997). *Class Counts: Comparative Studies in Class Analysis*. Cambridge: Cambridge University Press.
- Yamada, Masahiko (2010). The Current Issues on Foreign Workers in Japan. *Japan Labor Review* 7(3), 5-18.
- Yamaguchi, Jiro (2008), Kakusa Shakai no Genjo to Min (The status of the unequal society and public opinion). *Globalization and Governance Project Working Paper Series J-02*, Hokkaidō University.
- Yamanaka, Keiko (2003). "I'll Go Home, but When?": Labor Migration and Circular Diaspora Formation by Japanese Brazilians in Japan. *Japan and Global Migration: Foreign Workers and the Advent of a Multicultural Society* (eds. Douglass, Mike, Roberts, Glenda Susan). Honolulu: University of Hawaii Press, 123-152.

- Yamanaka, Keiko (2010). Civil Society and Social Movements for Immigrant Rights in Japan and South Korea: Convergence and Divergence in Unskilled Immigration Policy. *Korea Observer* 41(4), 615-647.
- Yamashita, Mitsuru (2019). The Corporate Community and Changes in the Japanese-style Employment System. *Japan Labor Issues* 3(2), 5-18.
- Yamawaki, Keizō (2003). Foreign workers in Japan, A historical perspective. *Japan and Global Migration: Foreign Workers and the Advent of a Multicultural Society* (eds. Douglass, Mike, Roberts, Glenda Susan). Honolulu: University of Hawaii Press, 38-51.
- Zenrōren (2018). 外国人労働者の受け入れ拡大政策に対する全労連としての要求と方針. http://www.zenroren.gr.jp/jp/opinion/2018/opinion181113_01.html. (05/11/2021).
- Zenrōren (2021). *This is Zenroren*. http://www.zenroren.gr.jp/jp/english/about/english101029_03.html. (05/11/2021).
- Zhou, Yanfei (2020). A Look at Japanese Households Facing Risk of Livelihood Collapse Due to COVID-19. *Japan Labor Issues* 4(24), 9-14.
- Zolberg, Aristide R. (1981). International Migrations in Political Perspective. *Global trends in migration: theory and research on international population movements* (eds. Kritz, Mary M., Keely, Charles B., Tomasi, Silvano M.). New York: Center for Migration Studies, 3-27.

Appendix Chapter II

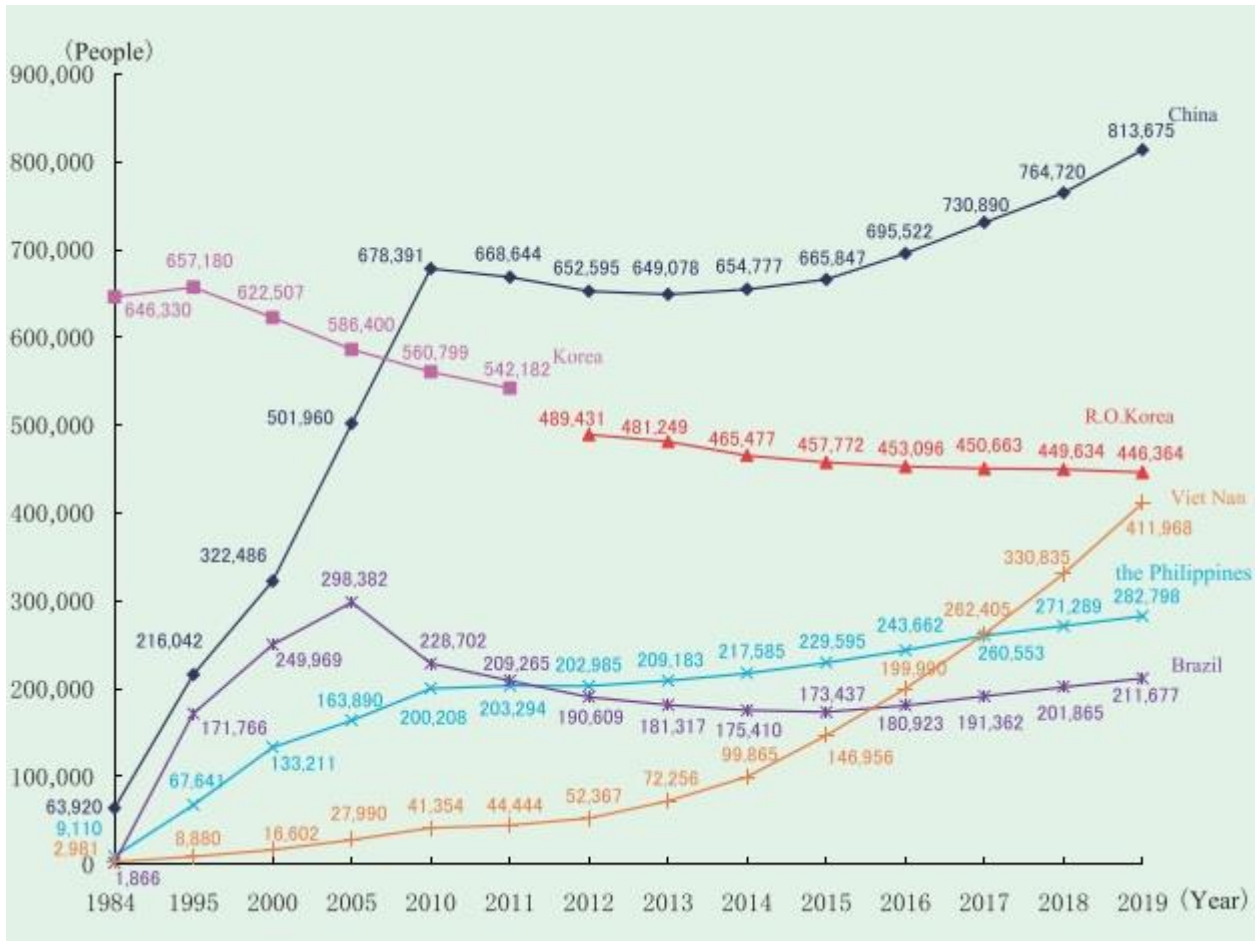


Figure A2.1. Changes in the number of foreign residents by major nationality in Japan. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

Status	Year	2015	2016	2017	2018	2019
Total		2,232,189	2,382,822	2,561,848	2,731,093	2,933,137
Mid to long-term resident	Professor	7,651	7,463	7,403	7,360	7,354
	Artist	433	438	426	461	489
	Religious Activities	4,397	4,428	4,402	4,299	4,285
	Journalist	231	246	236	215	220
	Highly-Skilled Professional (i)-(a)	297	731	1,194	1,576	1,884
	Highly-Skilled Professional (i)-(b)	1,144	2,813	6,046	8,774	11,886
	Highly-Skilled Professional (i)-(c)	51	132	257	395	570
	Highly-Skilled Professional (ii)	16	63	171	316	584
	Business Manager	18,109	21,877	24,033	25,670	27,249
	Legal/Accounting Services	142	148	147	147	145
	Medical Services	1,015	1,342	1,653	1,936	2,269
	Researcher	1,644	1,609	1,596	1,528	1,480
	Instructor	10,670	11,159	11,524	12,462	13,331
	Engineer/Specialist in Humanities/International Services	137,706	161,124	189,273	225,724	271,999
	Intra-company Transferee	15,465	15,772	16,486	17,328	18,193
	Nursing Care			18	185	592
	Entertainer	1,869	2,187	2,094	2,389	2,508
	Skilled Labor	37,202	39,756	39,177	39,915	41,692
	Specified Skilled Labor (i)					1,621
	Specified Skilled Labor (ii)					—
	Technical Intern Training (i)-(a)	4,815	4,943	5,971	5,128	4,975
	Technical Intern Training (i)-(b)	87,070	97,642	118,101	138,249	164,408
	Technical Intern Training (ii)-(a)	2,684	3,207	3,424	3,712	4,268
	Technical Intern Training (ii)-(b)	98,086	122,796	146,729	173,873	210,965
	Technical Intern Training (iii)-(a)			—	220	605
	Technical Intern Training (iii)-(b)			8	7,178	25,751
	Cultural Activities	2,582	2,704	2,859	2,825	3,013
	Student	246,679	277,331	311,505	337,000	345,791
	Trainee	1,521	1,379	1,460	1,443	1,177
	Dependent	133,589	149,303	166,561	182,452	201,423
	Designated Activities	37,175	47,039	64,776	62,956	65,187
	Permanent Resident	700,500	727,111	749,191	771,568	793,164
Spouse or Child of Japanese National	140,349	139,327	140,839	142,381	145,254	
Spouse or Child of Permanent Resident	28,939	30,972	34,632	37,998	41,517	
Long-Term Resident	161,532	168,830	179,834	192,014	204,787	
Special Permanent Resident	348,626	338,950	329,822	321,416	312,501	

Figure A2.2. Changes in the number of foreign residents in Japan by status. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

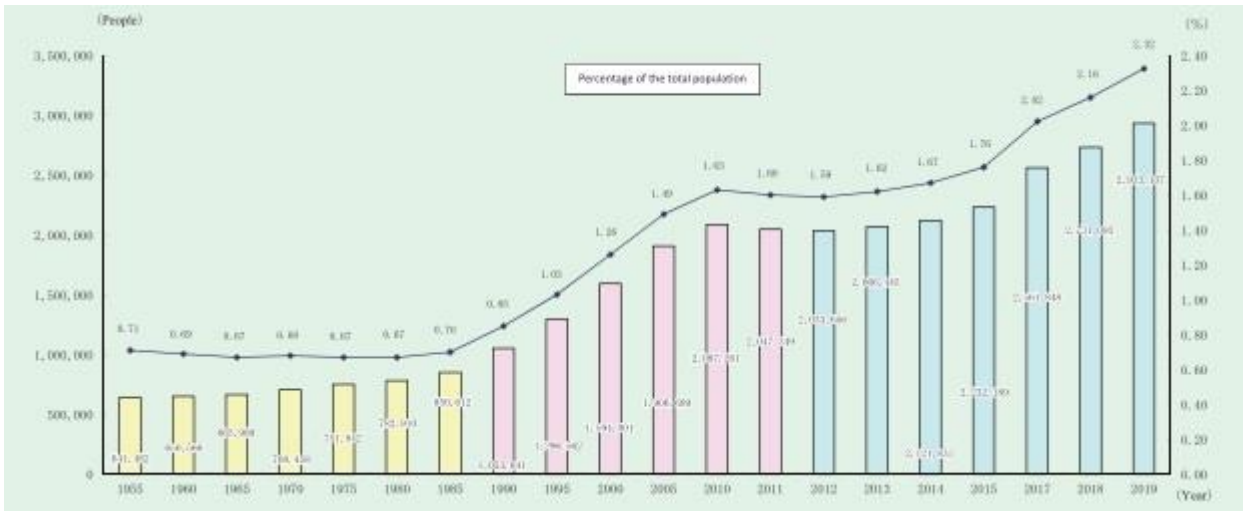


Figure A2.3. Changes in the number of foreign residents, and changes in the number of foreign residents as a percentage of the total population of Japan. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

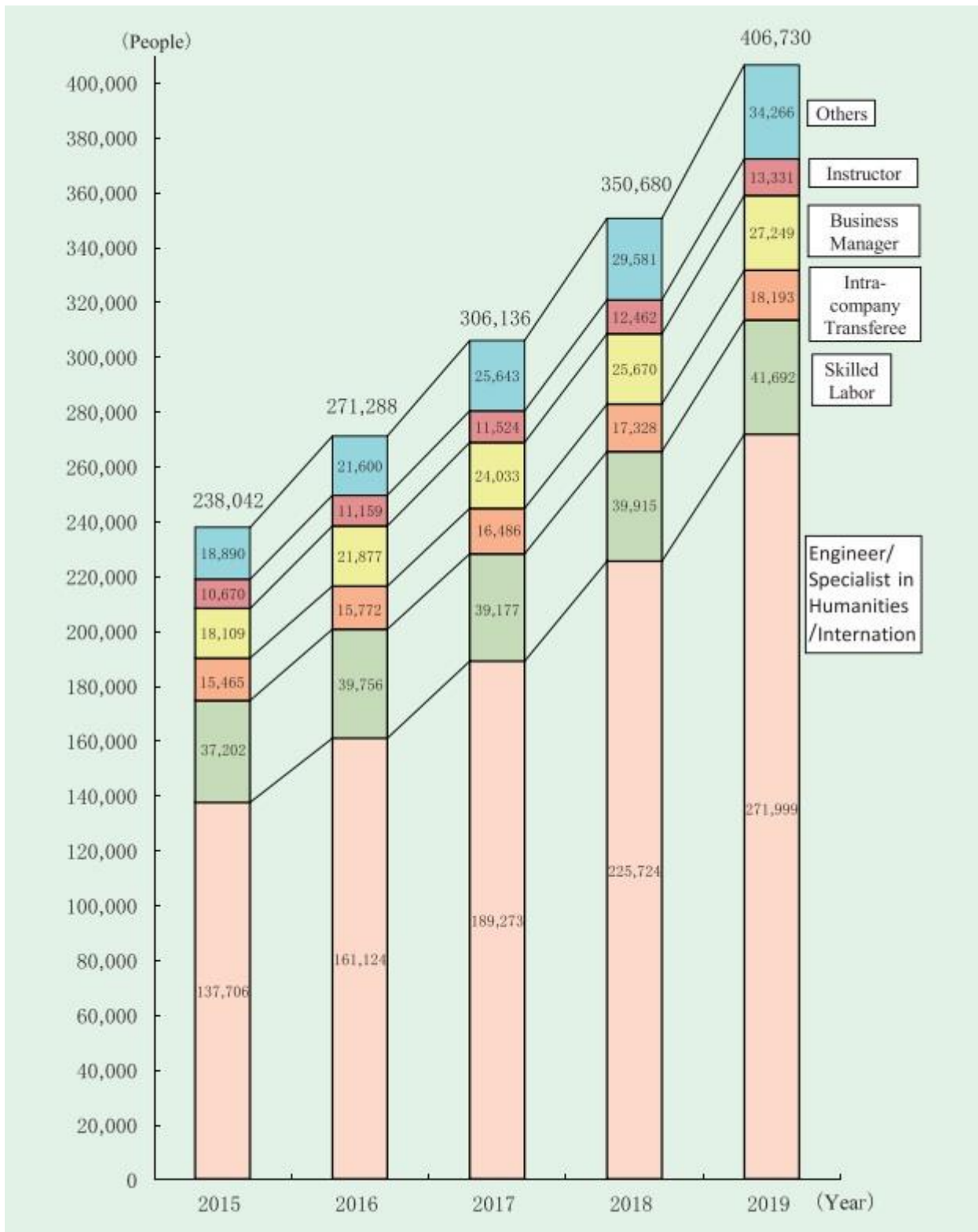


Figure A2.4. Changes in the number of mid- to long-term residents by status of residence for employment in professional or technical fields in Japan. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

Status of Residence \ Year	2015	2016	2017	2018	2019
Total	17,796,147	21,092,975	25,092,020	27,574,232	28,402,509
Diplomat	9,526	9,267	9,092	9,072	12,206
Official	25,788	28,282	29,684	33,217	42,934
Professor	3,140	3,172	3,166	3,194	3,185
Artist	360	387	394	435	474
Religious Activities	1,030	1,019	924	872	949
Journalist	81	111	88	43	69
Highly-Skilled Professional (i)-(a)	11	32	16	26	37
Highly-Skilled Professional (i)-(b)	107	166	250	432	624
Highly-Skilled Professional (i)-(c)	18	31	36	73	118
Business Manager	1,352	2,091	1,660	1,790	2,237
Legal/Accounting Services	—	4	2	4	5
Medical Services	29	34	63	55	58
Researcher	356	358	380	368	364
Instructor	3,020	3,042	2,992	3,432	3,463
Engineer/Specialist in Humanities/International Services	17,690	20,940	25,063	34,182	43,880
Intra-company Transferee	7,202	7,652	8,665	9,478	9,964
Nursing Care			1	1	4
Entertainer	37,155	39,057	39,929	42,703	45,486
Skilled Labor	6,421	6,404	3,692	3,551	4,355
Specified Skilled Worker (i)					563
Specified Skilled Worker (ii)					—
Technical Intern Training (i)-(a)	6,680	6,665	7,492	6,222	6,300
Technical Intern Training (i)-(b)	90,307	99,453	120,179	137,973	167,405
Technical Intern Training (ii)-(a)	1	2	—	12	8
Technical Intern Training (ii)-(b)	16	11	9	242	183
Technical Intern Training (iii)-(a)			—	64	226
Technical Intern Training (iii)-(b)			8	5,648	14,750
Cultural Activities	3,467	3,531	3,377	3,539	3,793
Temporary Visitor	17,404,987	20,665,390	24,617,024	27,054,549	27,810,548
Student	99,556	108,146	123,232	124,269	121,637
Trainee	15,702	15,740	16,393	13,389	12,985
Dependent	23,118	26,594	27,288	27,952	31,788
Designed Activities	14,980	18,210	22,444	27,752	31,712
Spouse or Child of Japanese National	9,591	10,188	9,998	10,466	10,694
Spouse or Child of Permanent Resident	2,007	1,959	2,170	2,081	1,990
Long-Term Resident	12,449	15,037	16,309	17,146	17,515

Figure A2.5. Changes in the number of foreign nationals newly entering Japan by status of residence. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

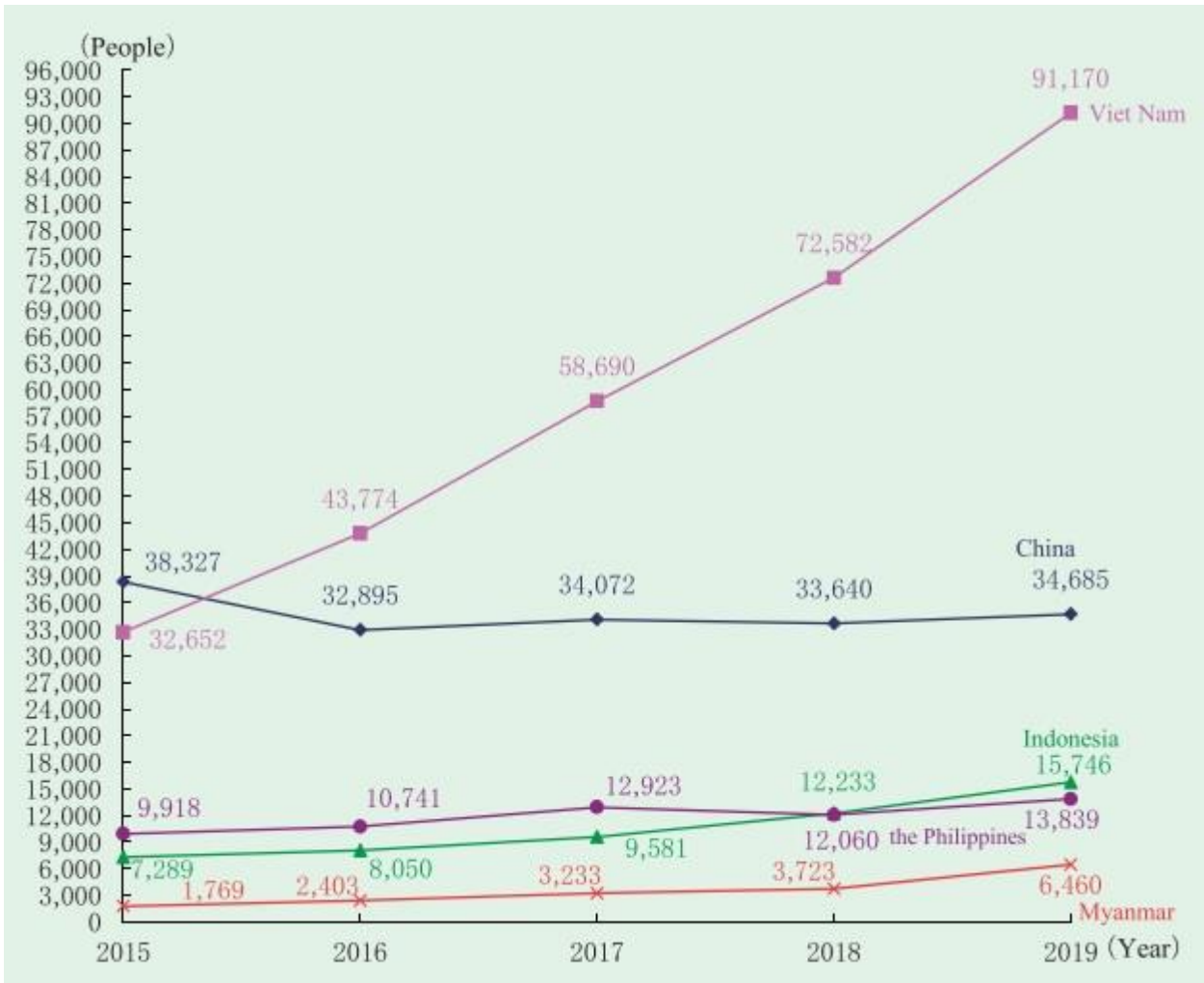


Figure A2.6. Changes in the number of foreign nationals newly entering Japan with the status of residence of Technical Intern Training by major nationality. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

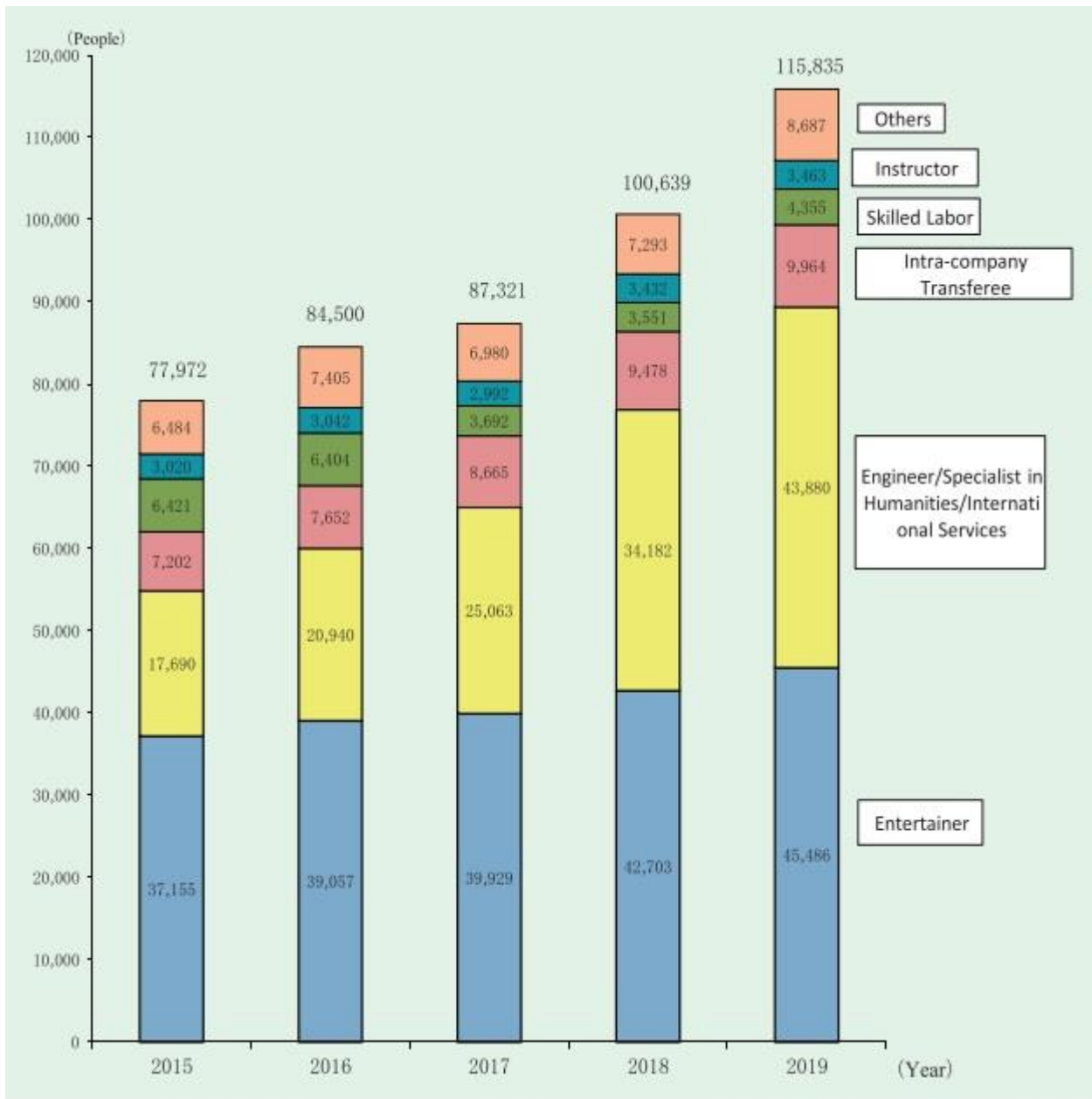


Figure A2.7. Changes in the number of foreign nationals newly entering Japan by status of residence for employment in professional or technical fields. 2020 Immigration Control and Residency Management (Immigration Services Agency of Japan, Ministry of Justice of Japan 2020).

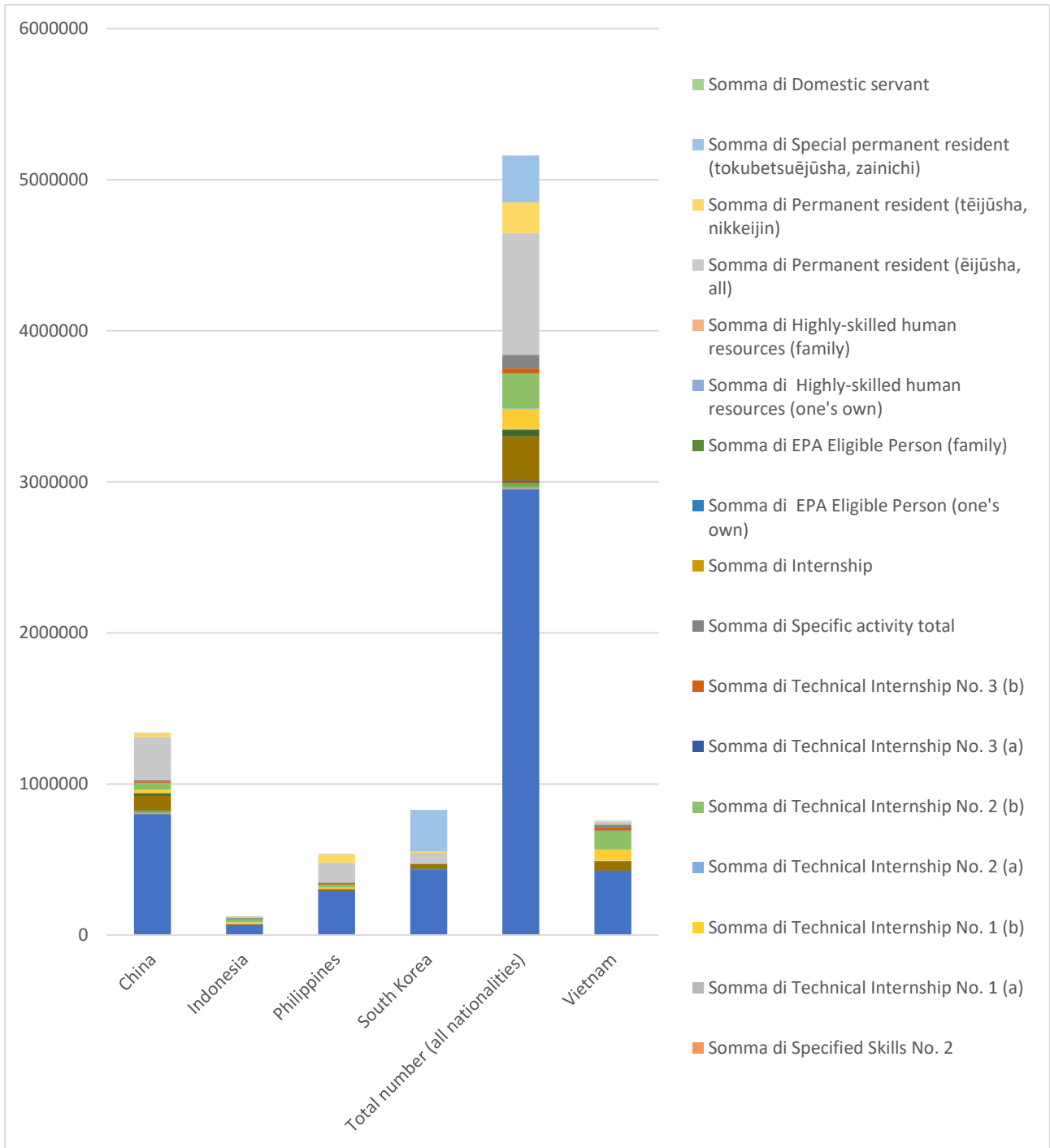


Figure A2.8. Total foreign residents by nationality (China, Indonesia, the Philippines, South Korea and Vietnam) and purpose of residence (Statistics Bureau, Ministry of Internal Affairs and Communications of Japan 2021).

Appendix Chapter III

List of interviewees in Japan

Tanaka Tsuneyuki. Deputy Director, Labour Legislation Office, Keidanren. Tōkyō, 7 February 2020.

Katayama Takahito. Director. International Policy Division of the International Policy Department, Rengō. Tōkyō, 10 February 2020.

Miyajima Yoshiko, Assistant Director, Policy Support Center; Namai Motoko, Assistant Director, International Affairs Office; Takanori Namigishi, Assistant Secretary, Trade Division; Yoshiki Katsura, member of Trade Union Committee of the Commercial Division, UA Zensen. Tōkyō, 13 February 2020.

Hikawa Masaichi, Attorney at Law, Nichibenren. Urawa, 14 March 2020.

Okunuki Hifumi, Executive President; Carlet Louis, Chief Finance Officer, Tōzen Union. Sarcedo (Italy), 10 February 2021.

Fuse Keisuke, Deputy Secretary General, Zenrōren. Sarcedo (Italy), 4 November 2021.

List of interviewees in Italy

Camporese Riccardo, Secretary of USR, CISL Veneto. Macerata, 8 February 2021.

Bianchi Enrico, Provincial Secretary and Coordinator, UIL Vicenza. Vicenza, 7 September 2021.

Crisci Andrea, Head of the Work, Welfare and Education area, Confindustria Vicenza. Sarcedo, 30 March 2021.

Fanelli Silvana, Confederal Secretariat member, CGIL Veneto. Mestre, 1 June 2021.

Maffi Emanuel, trade unionist, CGIL Vicenza. Macerata, 7 July 2021.

Cuccello Andrea, National Confederal Secretary, CISL Rome. Sarcedo (Italy), 27 October/22 November 2021.

Galossi, Emanuele, Head of Coordination Migration and International Mobility Area INCA National, CGIL Rome. Sarcedo (Italy), 17 January 2022.

Full interviews in Japan (Questionnaires. Italics added by the author during the interviews)

07/02/2020 Tōkyō

Keidanren (Japan Business Federation)

1. Can you summarise the current Keidanren role in the Japanese economy?

Keidanren has united the voice of member companies, mainly big business, in order to reflect the idea of business sectors since its establishment (1946). Nowadays, Keidanren chairman joins some important government advisory boards (*committees*) and sends the messages from business side (*tax/policy*).

2. What do you think about the deregulation and liberalisation processes that are evolving/going on in the Japanese labour market and in its economy (similar to all industrialised countries)? Are you in favour of these processes? And if so, why?

Keidanren is supporting the direction of the deregulation and liberalisation of labour market in general, because it is directing to promote flexible labour market. They say that Japanese external labour market is so underdeveloped that the flow of labour forces is limited, compared with other developed countries. *Keidanren is asking for more flexible workers in advisory committees, but they have frictions with labour.*

3. How do you assess the rate of involvement of Japanese entrepreneurs in your federation? Do you encounter any difficulties in reaching employers? Are you able to intercept "new" entrepreneurs in a labour market that is slowly changing?

Keidanren is open to new entrepreneurs. Actually, a lot of newly established companies join Keidanren for a few years. Keidanren has some committees for start-up business to absorb their ideas. *In the last 3 years Keidanren also deals with small and medium enterprises. The "older economies" continue to have a different priority with respect to the new ones. Most of Keidanren's efforts are still within the manufacturing sector. The main problem with new companies is that, although Keidanren tries to engage them actively, it is they (the new companies) who are not interested in being part of Keidanren.*

4. How do you think the Japanese labour market can evolve in the light of the structural changes in Japanese society (low birth-rate, ageing population, shrinking working-age population)?

We think that more opportunities should be given to female workers, elderly people and other people (*also handicapped*) who are not given enough chances to show their performance in workplaces. The conditions like nursing care, child-care and physical support should be arranged

for them. *Keidanren proposes to new companies entering the Federation these possibilities and thinks that there is as an absolute need to deal with these conditions.*

5. Can you describe Keidanren's opinion regarding the role of technology in the future of the Japanese economy?

Keidanren advocates the promotion of digital transformation, which encourages our member companies to develop digitisation. Education and training of employees in information technology is indispensable measures to embody digitised society. It will make our society more convenient. *The message they want to instill to companies towards digitisation is to invest in education training. This will hopefully increase productivity and facilitate also the work of employees. However, some employers, especially older employers, are opposed to this type of investment. In fact, employers do not follow Keidanren's call for education training (companies with younger employers are more receptive).*

6. What do you think about the temporary agency work system in Japan? Is it really useful to the Japanese economy?

Temporary workers are useful because they supplement lack of skills within a company. Also, there are workers who want to choose temporary style because they want their own free time. *With reference to the structural problems of Japanese economy and society, Keidanren says that if you can choose, it is preferable to be regular workers. According to the Federation, being regular workers in Japan is not so difficult.*

7. Do you think the new immigration law for the Japanese labour market could be effective? As the main and most important business federation in Japan, do you also act in some ways with this kind of phenomenon?

It is true that the new immigration opened the door to various kind of foreign workers for Japanese labour market. Japanese government says that highly skilled foreign workers are welcome, and the entry of manual workers should be limited (*Keidanren shares the same position of the government. The Chamber of Commerce, instead, is more favorable to a liberalization of the entries because, representing the small and medium-size enterprises, they have greater necessity of this kind of workers*). However, there are many de-facto manual workers in Japanese labour market such as technical intern trainees, foreign students and so on. A lot of companies that are suffering from labour shortage make full use of such workers. It is a profoundly serious problem. *There is strong pressure from the business side, especially to have more low-skilled workers and cheaper jobs available.*

8. How have you dealt with the phenomenon of immigrant workers in recent years? Is Keidanren in favor of their increase in the Japanese labour market? Or do you think they may be dangerous for the balance of the market itself?

Both Japanese government and business side are not ready for increasing foreign workers at drastically rapid pace. It is difficult for many foreign workers to learn Japanese language in a short term. On the other hand, we are not sure whether the balance of the market will be destroyed by foreign workers, because they usually work in workplaces which Japanese workers are not likely to join. *Therefore, Keidanren sees positively the fact that they enter as cheap workers in the labour market. Speed is an important factor. This must be done in conjunction with the promotion of the use of technology, especially to make it easier for women and the elderly to enter in the labour market.*

9. In the Japanese tripartite system, what is your role? What is your room for maneuver in the discussion of labour market policies?

Keidanren constitutes part of Japanese tripartite system (Keidanren, Rengō (labour union) and government). Keidanren joins Government's tripartite advisory committees to reflect the voice from business side. The themes taken up at them cover all the matters concerning labour issues, especially labour laws. Keidanren regularly have dialogues with Rengō twice a year (*in autumn and winter, top level dialogues outside of meetings with government representatives*) to share their opinions. Until now, Japanese tripartite system functions very well.

10. How do you assess your relationship with Japanese government? And with the current government?

Recently, the relationship between Keidanren and the government is very good. Keidanren supports the policies of the government and the government pay attention to Keidanren's voice. Current Keidanren's chairman, Mr. Hiroaki Nakanishi, is the chairman of Hitachi Corporation, which is the biggest electronic manufacturing company in Japan. Hitachi has strong influence in Japanese industry. Therefore, Keidanren's power is magnified now, thanks to Hitachi. *In 2009, Keidanren had a bad relationship with the DPJ government. Traditionally it has good relations with the LDP.*

11. How do you assess the role of Japanese trade unions, in particular Federations, in the past and present? Do you think their role is useful in maintaining a fruitful dialogue in the Japanese labour market? What is your relationship with them?

Japanese labour unions were once very radical, until early 1960s. However, thanks to highly economic growth during 1960s, their movement became calm and the situation continues until now. Following that, adversarial relationship between labour and management shifted to sound as one.

As mentioned before, Keidanren and Rengō have good relations now. The unionization rate of Japanese labour unions is almost 16% now. The smaller the company size, the lower the unionized rate. Especially, service sectors and non-regular workers are not united. Whether it can be improved or not is up to the efforts of labour union. *In addition, there are no relationships with other unions. The relationships are only with Rengō, if not in secretariat level with other industrial unions.*

12. Do you have any relations with the Italian business world?

Keidanren has a Japan-EU committee. It dispatches delegations to EU and receives them from EU. However, Keidanren does not have a committee directly connecting with Italian Business society. *This is because it is not relevant to have one. In fact, Keidanren has no committees with individual European countries, but only Japanese-US and Japanese-Chinese committees.*

10/02/2020 Tōkyō

Rengō (Japanese Trade Union Confederation)

- Can you summarise Rengō current role in the service, care and manufacturing sectors?

Rengō sees the manufacturing sector as the most important for the Japanese economy. Currently it is shrinking due to outsourcing production processes abroad, so the possible solutions are a greater use of technology. Technology serves to help and support workers and productivity in the current lack of the working force. The government is supporting the use of technology.

Japanese service sector is the one in which now the greater part of the people is working, though it turns out to be extremely low in the productivity. With regard to the GIG economy there are the same problems: it is really easy to find a job, but there is no protection within the law. Rengō presses on the fact that these workers must be recognized as normal employees and it is actively discussing with the government to have a law regulation (that in this moment does not exist).

The care service system is very important to the problem of a rapidly aging population. The problems are the same as in Europe, but unlike European countries, Japan cannot use foreign workers because of the language barrier that makes the training process and the language test too much difficult (*it is required for being able to work and reside in Japan*).

In the care sector, a care insurance system for the elderly was introduced 20 years ago, though care workers continue to earn low wages. Rengō and the government are discussing this problem, while proposing a "direct support": the solution to the low-wage problem could be an increase in the salary of professional care workers, rising the consumption tax to 8%-10% (2% must be used for care economy; proposal of October 2019). Rengō is pushing the government in this direction.

- Do you also perceive a climate of strong deregulation and liberalisation that is affecting workers' guarantees? (in various sectors)

Yes, and it is a problem for our members.

- How do you assess the unionization rate in Japan today? Do you encounter the same dynamics and difficulties as the other industrialized countries? Are you able to intercept "new" workers in a labour market that is slowly changing? In this climate of strong change in the labour market, how does Rengō deal with these changes and how does it try and intercept the "new" workers?

The main problem of organising workers is: Rengō cannot reach them, especially in enterprises (which already have their unions), non-regular workers and women. For ten years Rengō has focussed on traditional workers. Now they are managing to organise most of the non-regular workers, while the number of regular workers is constantly decreasing (both in total numbers and in its members).

Rengō discusses with the government to increase the number of traditional regular workers again and calling for more protection for this category, but without giving up the organization of non-regular workers.

- How do you think the Japanese labour market can evolve in the light of the structural changes in Japanese society (low birth-rate, ageing population, shrinking working-age population)?
- How does the temporary agency work system work in Japan? Is it really useful to the Japanese economy? What about workers' rights? What is the incidence of foreign workers in this system?
- How is Rengō facing the expansion of this system (temporary agency work system)? Do you share the need of industrialists and entrepreneurs to have an increasingly flexible and deregulated labour market?

As for TAS, ten years ago dispatched workers in companies were a problem (they were not organised, and some companies were simply bad in workers management). However, now they are organised, and Rengō actively discusses with their associations.

In April 2020 will be (*in the meantime has been*) introduced a new law for non-regular workers concerning equal pay between regular and non-regular workers. Rengō considers this new law as a possible solution to the problems of non-regular workers.

- How do you see the current situation in care-work sector? Do you think it can be sustainable in the current Japanese welfare system? Do you find that extending the system to foreign workers can change the situation?

- How do you assess the role of Japanese trade unions, in particular Federations, in the past and present? Do you think they are competitive in a system historically dominated by enterprise unions?

Enterprise unions protect their workers, so it is very difficult for Rengō to protect all categories of workers. Rengō has serious difficulties due to lack of political power.

- Do you think the new immigration law for the Japanese labour market could be effective? As the biggest trade union confederation in Japan, do you also act to protect and coordinate this kind of phenomenon?

- How have you dealt with the phenomenon of immigrant workers in recent years? Is Rengō in favor of their increase in the Japanese labour market? Or do you think they may be dangerous for the balance of Japanese workers?

Rengō is absolutely against the entry of foreign workers. In fact, its main objective is the protection of Japanese workers (in particular those within the historical categories of the Federation, first of all manufacturing).

- In the Japanese tripartite system, what is your role? Do you have room for maneuver in the discussion of labour market policies?

In the Japanese tripartite system Rengō lacks political power. Also in 2009 with the DPJ government the situation was not better, the lack of power was the same. Ultimately, regular workers have enough social protection and enough salary, while the non-regular workers need both.

13/02/2020 Tōkyō

UA Zensen (Japanese Federation of Textile, Chemical, Food, Commercial, Service and General Workers' Unions)

1. What can you tell me about the Japanese service industry? The Italian service sector suffers from a strong component of worker uncertainty, contract volatility and job uncertainty. The contracts themselves are often insecure and fixed-term contracts. Are there the same problems in Japan?

2. Do you also perceive a climate of strong deregulation and liberalization that is affecting workers' guarantees? (in various sectors)

After the explosion of the bubble economy (1998), there was an increase in fixed-term employment contracts. In the last twenty years the fixed-term contracts increase of 38.5%.

The various sectors, in the previous economic stages, demanded simple tasks for part-time jobs, instead now there has been an advancement in the skills demands (a greater number of skills are demanded for almost all jobs).

Part-time and fixed-term jobs play more important roles in Japanese labour market, though the wage gap with regular workers is still large (thus creating a big difference in wages).

According to UA Zensen, with the amendment of the part-time law planned for April and created to equalize in a proportional way the salaries of the different types of contracts, the problem could be solved at least in part. It should be a first step to solve the disparity wage gap. UA Zensen is pressing the government to solve this wage gap problem.

On the other hand, about 60% of Japanese housewives do not want to work long hours in order to not pay too much tax. In this Japan differs from Italy, where the decision to do a part-time job is often not a choice, while Japan offers more decision-making room. The remaining 40% want to increase their salary, while they meet the opposition of the government.

3. How do you think the Japanese service sector can evolve in the light of the structural changes in Japanese society? (low birth-rate, ageing population, shrinking working-age population) Because of these problems, the care sector is growing (and it will continue to grow). The main problem in the sector are low wages. In medium-sized cities, local governments (e.g. Toyama and others) are trying to centralize care services, thereby creating more compact services. In smaller cities, however, governments are trying to work together to solve the problem.

In the past years Japan had similar problems and tried to use foreign workers as cheap labour. However, in recent years regulations have tightened (*their arrival from Asian countries*). According to UA Zensen, Japanese labour market is now less attractive to foreign workers because of overall low wages.

This trend (*low wages*) is a matter of growing rate (which is not so high compared to the other neighboring Asian countries). In addition to this, there is the problem of the general lack of trust in the Japanese labour system: foreign workers have little faith in the possibility of real working integration and career advancement. In addition, there is the problem of the long working hours, which in the Japanese labour system is a precondition and creates adaptive difficulties for workers coming from abroad.

4. Can you give me an overview of the Japanese tourism industry? What is the incidence of foreign workers in the sector?

According to UA Zensen, their number is not relevant for the Japanese tourism industry.

They work mostly in the commerce and the food sector. Few of them are working in hotels, more in commerce (in particular in food processing). The biggest problems are language barrier and working standards. Even in supermarkets, they do not understand the content of the contracts and cannot work there. Employers may think that they do not have the ability to speak Japanese, so they do not want to hire them. Customers, on the other hand, do not feel much difference compared to Japanese employees.

Sometimes it is a problem of overall job perception. Generally, workers tend to work the hours required by their contract of employment, though not for Japanese workers. For example, workers are required to clean before and after regular work hours.

5. How does the temporary agency work system work in Japan? Is it really useful to the Japanese economy? What about workers' rights? What is the incidence of foreign workers in this system?

The regulation of the TAS is restrictive, even if with each reform of the TAS regulatory law the categories of jobs that fall within it increase. It can be expanded, however the TAS are restricted in the working categories and strictly regulated. A worker with this kind of contract, after three years of employment has the mandatory right to be regularized (see attachment A).

6. How is UA • Zensen union facing the expansion of this system? Do you share the need of industrialists and entrepreneurs to have an increasingly flexible and deregulated labour market?

UA Zensen's position is the same as Rengō's (though more favorable for part-time workers).

7. How do you assess the role of Japanese trade unions, in particular Federations, in the past and present? Do you think they are competitive in a system historically dominated by enterprise unions?

Japanese trade union system is enterprise based. This system was much stronger in the past. UA Zensen is promoting to organize part-time workers and is currently the only union in Japan that is doing so. It is the only union in Japan with this goal because in the past labour unions were only based on and within companies (especially large ones). Now they focus more on SMEs and local companies.

8. Do you think that the coverage of trade unions, in particular UA • Zensen, in the service sector and with irregular workers is sufficient?

Currently the coverage is only 10% (also due to market divisions).

9. Are you experiencing or perceiving a crisis in the union system in Japan? How do you assess the rate of unionization in Japan?

The total unionization rate is 16.9%, 10% in trade and 8.6% for part-time work. The main task of UA Zensen is to increase the percentage of the last figure, and the primary target are non-regular workers. Regardless of this, UA Zensen's goal remains to organize all those who are employed in the Japanese labour market, under any type of contract.

The current opinion of the union on the results of these goals are that they may not be enough, even if they are focusing on maximizing these results (the goal is to reach one million members). Currently this is a partial success. UA Zensen is also being considering to reach large companies, as it is essential to organize all types of workers in any kind of company (large ones and SMEs).

10. Are you able to intercept new workers in the sector in a labour market that is slowly changing?

The internal Part-time Workers Bureau is working on this issue. In the past, some workers have approached voluntarily Rengō and UA Zensen, asking help for consultation processes. In the past, UA Zensen has tried to help them and accept their requests (so there is already an history). Now UA Zensen is trying to let the general public know that they can help these types of workers (however this is not enough).

Recently, a union has been founded for uber and just eat's workers and it has just affiliated with Rengō. UA Zensen is considering whether to dedicate a specific division in the future.

11. Do you think the new immigration law for the Japanese labour market could be effective? As an industrial union, do you also act to protect and coordinate this kind of phenomenon? (see the newsletter for members regarding the immigration law reform)

The objectives of UA Zensen are to have an equal pay for equal work, regardless of whether it is a Japanese or a foreign worker.

On the request to give an evaluation on the new law for the entry of foreign workers with low qualifications (positive, negative, other), the answer was:

The stance of UA Zensen is not to open the market freely so as to protect its members. However, as an industry union, we believe that foreign workers must be accepted, and that companies, trade unions and foreign workers must cooperate. Foreign workers also must work to accept the rules. In addition, trainees must be limited in numbers, while UA Zensen is not too involved in the program (*of the trainee's system*).

12. In the Japanese tripartite system, what is your role? Do you have room for maneuver in the discussion of labour market policies?

Inside of Rengō, UA Zensen puts more money than all the other unions, but Rengō thinks UA Zensen is only capable of organizing workers. The reason is simply because UA Zensen is the only union that covers those specific labour areas.

Within Rengō, the trade sector does not reflect the position of UA Zensen, which is much more right-wing oriented. In the secretariat of Rengō (policy division), there is only one representative of the commerce sector, although there are 30 people in total. In the organizing division there are three representatives of UA Zensen. This means that the ideas and positions of UA Zensen in the policy making processes cannot be reflected (the cause seems mostly to be the fact that UA Zensen is sectoral, but it is actually a political issue). Rengō has too much capitalistic behaviors (it covers sectors such as manufacturing, automotive, etc.). UA Zensen dreams of creating an industrial sector federation of its own.

In the tripartite system only Rengō, Keidanren and the government are relevant. UA Zensen wants to become more powerful in political decision-making processes as its sectors grow in importance and worker's numbers. The key to the solution is more political activity (two members of the UA Zensen are in the government), having direct policy making effects and bypassing the leadership of Rengō.

13. Role of technology in the current labour market.

The government and the industry are trying to use more technology. It can be used to solve the need to increase productivity. For example, in industries productivity can be increased through the use of AI (for instance with automatic cashiers, etc.).

When asked whether the technology could only be useful to increase productivity and not for the benefit of workers, the answer was:

In this sector, technology can help the transformation from part-time to full-time work, but it has already had negative impacts in the past. New technology used in banks, on the other hand, can have the biggest (and most positive) impact.

Ultimately, UA Zensen is positive in the use of technology in the Japanese labour market and its sectors of interest.

14/03/2020 Urawa

Mr. Hikawa (Lawyer) - Japan Federation of Bar Associations

1. What can you tell me about the current situation of foreign workers in Japan? Can you give me a brief summary of your work with/for them.

Mr. Hikawa has worked for six years as a lawyer in divorce, bankruptcy and criminal cases involving foreigners in Japan, as a public defender. Regarding criminal cases, most of them are petty crimes committed by foreigners.

2. How long have you been working on these issues? Have you seen significant changes in the amount and type of problems over the years?

I have been working on these issues for six years. Now most of the cases involve trainees who have defected from their workplace and ask for help because they cannot renew their residence permit, thus becoming overstayers.

3. Can you divide, by frequency, the nationalities that request your services/help? Could you also make a gender and age division?

The first group, by nationality, is Vietnamese, as it has connections with the Catholic Church.

Men to a greater extent than women; many more young people than the elderly (see attachment).

4. I have read a lot about a division by nationality (gender and age) of immigrant workers in Japan, a sort of "social pyramid". Do you confirm this definition? Or is it an exaggeration?

Yes, it is real. Mainly the police are discriminating against immigrant workers.

5. Have you seen a (greater) interest from politics and the media in these issues over the years? Can lawyers, and associations in general, in Japan raise awareness in society?

On the lawyers' side this is very difficult. They do not have enough visibility to reach public opinion. Thanks to the new immigration law there is much more attention on the subject, especially on the government side.

6. In Italy there are many institutions and organizations that deal with these issues. Including trade unions. What about Japan?

Trade unions are not good for protecting and organizing foreign workers. There are some trade unions directly related to immigrant workers, such as Zentōitsu, especially on the issue of trainees. In this specific case there is also a strong connection with some NGOs, such as SMJ (Solidarity Network with Migrants Japan), which in turn have ties with some congressmen. Ultimately, I do not believe in the work of trade unions in this area.

7. How do you see the political situation in relation to the migration phenomenon in Japan? And in relation to the types of jobs and the demands of the labour market?

I confirm that there is a shortage of unskilled workers in many traditional sectors of the Japanese labour market (manufacturing, etc.).

8. Can you give me a prediction on how you feel the situation might evolve in the near future?

Immigrant workers are increasing, but it is expected that in the future there will be less economic attraction and incentives to work in Japan. Although wages are still high, they are expected to fall in the future.

Interview questions in Italy (Japanese interviewees)

10/02/2021 Sarcedo (VI)

Tōzen Union

In this case, was initially given the general discussion topic and the respondents were allowed to discuss freely. Subsequent questions were consequential and asked in the moment.

04/11/2021 Sarcedo (VI)

Zenrōren (National Confederation of Trade Unions)

I part: about Zenrōren

1. Can you summarise what Zenrōren is, its history, and who it currently represents at the national level? (Who primarily represents, and if possible, map out representation)
2. What is Zenrōren's role in the Japanese tripartite system of national industrial relations. Do you have enough power in the discussion of domestic labour market policies? Current interaction with the government, other trade union confederations (Rengō, Zenrōkyō), and management (Keidanren).
3. Current problems of reaching workers in a (global) era of crisis in union representation. How do you assess the role of Japanese unions, particularly the confederations, in the past and present? Do you think they are competitive in a system historically dominated by enterprise unions?
4. Incidence of Zenrōren in current labour market policies. Considerations on the current situation of the Japanese labour market and future prospects.
5. Considerations about the phenomena of transformation of the labour market caused by globalization and homologation to European/other world economic systems. How Zenrōren fits into this transformation.
6. What is Zenrōren's role in the care sector and opinion on the particular dynamics of care work in Japan.
7. Do you think that Zenrōren's role as an institutional actor is still central and what plans does it have with respect to market transformations (deregulation, liberalization, competitiveness due to

globalization)? How much decision-making power does Zenrōren have and what is the perception of the current state policies?

II part: Japanese migration policies and migrant workers

1. Considerations on the current situation regarding migrant workers in the domestic labour market, their access, participation and employment position with respect to the problems concerning their presence.
2. Incidence of Zenrōren in current migration policies regarding the labour market and Zenrōren's position with respect to the issue of migrant workers and their inclusion in the Japanese productive system. How have you dealt with the phenomenon of migrant workers in recent years? Does Zenrōren support their increase in the Japanese labour market? Or do you think they can be dangerous to Japanese labour?
3. What is Zenrōren's position in the national political discussion tables on the issue of migrant workers?
4. What is Zenrōren's position regarding the issue of entry (sectoral/specific rates/etc.), participation and protection of migrant workers? What are the forecasts regarding the future?
5. How has Zenrōren positioned itself with respect to inclusion/"exclusion" policies towards migrant workers? (membership)
6. How does Zenrōren deal with the problems which can arise between Japanese workers and migrant workers in the different economic phases (economic growth, stagnation, economic crisis, etc.)? How does Zenrōren handle possible problems between its traditional role of worker protection in the pivotal sectors of the Japanese labour market (manufacturing) and the presence of migrant workers?
7. Do you think the 2018 immigration amendment for Japan's labour market can be somewhat effective? As one of the largest labour confederations in Japan, do you also act to coordinate this kind of policy?

III part: socio-economic transformations and convergence

1. How do you think the Japanese labour market can evolve in light of the structural changes in Japanese society (low birth rate, ageing population, shrinking working age population)? Do you think it can be sustainable under the current Japanese welfare system? Do you think extending the system to foreign workers will change the situation?

2. What is your opinion on the future of Japan on the issue of opening/closing to foreign labour?
3. Do you see a transformation in Japan's labour market-driven migration policies? If yes, at what speed? Do you think that this could lead Japan to a transformation of its migration system and economic policy in a way more similar to the European one, especially given the demographic similarities with Italy (and the Mediterranean countries)? Can we hypothesize some kind of systemic convergence?
4. Opinion on different/opposite systems (Japan-Italy, if known) and possibility of convergence of policies/systems.

Interview questions in Italy (Italian interviewees)

08/02/2021 Macerata

CISL (Confederazione Italiana Sindacati Lavoratori) Vicenza

1. Role of CISL in the tripartite system of national industrial relations.
2. Historicity of national representation by CISL.
3. Who it primarily represents.
4. Role in the integration of immigrant workers in the labour market.
5. Incidence in policies concerning the labour market.
6. Incidence in migration policies related to the labour market.
7. Considerations on the current situation of the national labour market.
8. Considerations on the current situation regarding immigrant workers in the national labour market.
9. Considerations by sector: manufacturing, services, care.
10. Problems encountered (informal work, undeclared work, illegal hiring, etc.).
11. Hypotheses of transformation in the near future of the market and incidence of immigrant workers.
12. Market transformation as a function of deregulation and liberalization. Consequences of these processes and role of workers.
13. Considerations about phenomena of labour market transformation caused by globalization and homologation to other European/world systems.
14. Role of other institutions and problems related to interactions with them.

15. Opinion on different/opposite systems (Italy-Japan, if known) and possibility of convergence of policies/systems.
16. Evaluation of the representation of immigrant workers in Italy in the various sectors. Management in sectors sensitive to this dynamic (manufacturing, care, services).
17. Evaluation of a greater presence of immigrant workers in Japan. Presence in the care and services sector (if known).
18. Do you think the role of trade unions as institutional actors is still central?

07/09/2021 Vicenza

UIL (Unione Italiana del Lavoro) Vicenza

General questions:

1. Role of UIL in the tripartite system of national industrial relations. Current interaction with the State party, other union confederations, management party.
2. Historicity of national representation by UIL. Current problems of reaching workers in an era of crisis in union representation.
3. Who primarily represents (if possible map out representation).
4. Incidence of UIL in current policies regarding the labour market.
5. Incidence of UIL in the current migration policies related to the labour market and UIL position with respect to the theme of immigrant workers and their insertion in the Italian productive system.
6. Considerations on the current situation of the national labour market and perspectives.
7. Considerations on the current situation regarding immigrant workers in the national labour market, their insertion, participation and position with respect to the problems concerning their presence.
8. Considerations by sector: manufacturing, services, care (a look at how UIL fits into these sectors).
9. Various problems encountered (informal work, black labour, *caporalato*, etc.), in which UIL acts.
10. Hypotheses of transformation in the near future of the market and incidence of immigrant workers.
11. Transformation of the market as a function of deregulation and liberalization. Consequences of such processes and UIL's position with respect to such changes (how favourable and political considerations).

12. Considerations about phenomena of transformation of the labour market caused by globalization and homologation to other European/world systems. How UIL positions itself in this transformation.
13. Role of other institutions and problems linked to interactions with them. Interaction with the State, other trade union confederations, and management.
14. Opinion on different/opposite systems (Italy-Japan, if known) and possibility of convergence of policies/systems.
15. Role of UIL in the care sector and opinion on particular Italian dynamics.
16. Do you think that UIL's role as an institutional actor is still central, and what plans does it have with respect to market transformations (deregulation, liberalization, competitiveness due to globalization)? How much decisional margin does the UIL possess and what is the perception with respect to state policies?
17. Do you have relations with the institutions of Japanese trade union representation (TUC)?

UPDATE (immigration issue):

1. How has UIL stood towards inclusion/"exclusion" policies towards immigrant workers?
2. What is UIL's position in national political discussion tables on the issue of immigrant workers?
3. What is UIL's position on the issue of entry (sectoral/specific rates/etc.), participation and protection of immigrant workers? What are the forecasts regarding the future?
4. How does UIL deal with the problems that may arise between native workers and immigrant workers in the different economic phases? How does UIL manage possible "short circuits" between the traditional role of worker protection in key sectors of the Italian labour market and the presence of immigrant workers?

30/04/2021 Sarcedo

Confindustria Vicenza

1. Role of Confindustria in the tripartite system of national industrial relations. Current interaction with the State and trade unions.
2. Historicity of national representation by Confindustria. Current problems in reaching entrepreneurs in the era of tertiarization.
3. Who primarily represents (if possible map out representation).
4. Incidence of Confindustria in current policies concerning the labour market.

5. Incidence of Confindustria in the current migration policies regarding the labour market and Confindustria's position regarding the theme of immigrant workers and their insertion in the Italian productive system.
6. Considerations on the current situation of the national labour market and prospects.
7. Considerations on the current situation regarding immigrant workers in the national labour market, their insertion, participation and position with respect to the problems concerning their presence.
8. Considerations by sector: manufacturing, services, care (a look at how Confindustria fits into these sectors and the situation of company membership).
9. Various problems encountered (informal work, black market, *caporalato*, etc.), in which Confindustria acts.
10. Hypotheses of transformation in the near future of the market and incidence of immigrant workers in the new entrepreneurial structures.
11. Market transformation as a function of deregulation and liberalization. Consequences of these processes and Confindustria's position with respect to these changes (how favourable and political considerations).
12. Considerations regarding phenomena of labour market transformation caused by globalization and homologation to other European/world systems. How Confindustria positions itself in this transformation for its own representatives.
13. Role of other institutions and problems linked to interactions with them. Interaction with the State and trade unions.
14. Opinion on different/opposite systems (Italy-Japan, if known) and possibility of convergence of policies/systems.
15. Role of Confindustria in companies related to care and opinion on particular Italian dynamics.
16. Do you believe that the role of Confindustria as an institutional actor is still central and what projects does it have with respect to market transformations (deregulation, liberalization, competitiveness due to globalization)? How much decision-making leeway does Confindustria have and what is its perception of state policies?
17. Do you have relations with the institutions of Japanese entrepreneurial representation?

01/06/2021 Mestre

CGIL (Confederazione Generale Italiana del Lavoro) Veneto

1. Role of CGIL in the tripartite system of national industrial relations. Current interaction with the State party, other trade union confederations, management party.
2. Historicity of national representation by CGIL. Current problems of reaching workers in an era of crisis of union representation.
3. Who primarily represents (if possible map out representation).
4. Incidence of CGIL in current policies regarding the labour market.
5. Incidence of CGIL in the current migration policies concerning the labour market and CGIL's position with respect to the theme of immigrant workers and their insertion in the Italian productive system.
6. Considerations on the current situation of the national labour market and perspectives.
7. Considerations on the current situation regarding immigrant workers in the national labour market, their insertion, participation and position with respect to the problems that concern their presence.
8. Considerations by sector: manufacturing, services, care (a look at how CGIL fits into these sectors).
9. Various problems encountered (informal work, black labour, *caporalato*, etc.), in which CGIL is acting.
10. Hypotheses of transformation in the near future of the market and incidence of immigrant workers.
11. Transformation of the market as a function of deregulation and liberalization. Consequences of these processes and CGIL's position with respect to these changes (how favourable and political considerations).
12. Considerations about phenomena of transformation of the labour market caused by globalization and homologation to other European/world systems. How CGIL positions itself in this transformation.
13. Role of other institutions and problems linked to interactions with them. Interaction with the State, other trade union confederations, management party.
14. Opinion on different/opposite systems (Italy-Japan, if known) and possibility of convergence of policies/systems.
15. Role of CGIL in the care sector and opinion on particular Italian dynamics.
16. Do you think that the role of CGIL as an institutional actor is still central, and what projects does it have with respect to market transformations (deregulation, liberalization, competitiveness

due to globalization)? How much of a decisional margin does the CGIL possess and what is the perception with respect to state policies?

17. Do you have relations with the institutions of Japanese trade union representation (TUC)?

07/07/2021 Macerata

Mr. Maffi, CGIL Vicenza

1. CGIL 's role in immigration issues: position, presence and initiatives.
2. Overview of the presence of immigrant workers (numbers, origin, sectors in which there is greater employment).
3. Problems found for workers.
4. Problems encountered for the union (reaching workers, political difficulties, etc.).
5. Relationship of CGIL with other confederations on this issue.
6. CGIL 's relationship with the state and employers' associations on this issue.
7. Why come to Italy?
8. Why work in those specific sectors?
9. Europe as the only possible destination or also others? (e.g. Asia).
10. Future predictions and how the situation of immigrant workers may change.
11. Predictions of how the state (policies) and the labour market may change.
12. Predictions of how CGIL may be relevant in the future on this issue.

22/11/2021 Vicenza

CISL (Confederazione Italiana Sindacati Lavoratori)

1. How has CISL positioned itself with regard to the policies of inclusion/"exclusion" of immigrant workers?
2. What is CISL's position in the national political discussion tables on the theme of immigrant workers?
3. What is the position of CISL with regard to the issue of entry (sectoral/specific rates/etc.), participation and protection of immigrant workers? What are the forecasts for the future?
4. How does CISL deal with the problems that can arise between native workers and immigrant workers in the various economic phases? How does CISL manage possible "short circuits" between the traditional role of worker protection in key sectors of the Italian labour market and the presence of immigrant workers?

5. Opinions on the transformations of the Italian political-economic system and possible global neo-liberal convergence.

17/01/2022 Sarcedo

INCA (Istituto Nazionale Confederale di Assistenza) CGIL (Confederazione Generale Italiana del Lavoro)

1. How has the CGIL dealt with inclusion/"exclusion" policies towards immigrant workers?
2. What is CGIL's position in national political discussion tables on the subject of immigrant workers and migration policies?
3. What is CGIL's position on the issue of entry (sectoral/specific rates/etc.), participation and protection of immigrant workers? What are the forecasts for the future?
4. How does the CGIL deal with the problems that can arise between native workers and immigrant workers in different economic phases? How does CGIL handle possible "short circuits" between the traditional role of worker protection in key sectors of the Italian labour market and the presence of immigrant workers? (topic of protection of the native grassroots membership vs. universalistic protection of workers).
5. Opinions on the transformations of the Italian political-economic system and possible global neo-liberal convergence.

Opinions on the transformations of the Italian political-economic system and possible global neo-liberal convergence.

6. Opinion on Covid's impact on these issues.