

# Comparative Analysis of Integration Policies in Switzerland, Germany, and Türkiye: Is Türkiye a Country of Immigration?

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**Abstract:** This article performs a comparative analysis to evaluate the importance of immigration policies by studying the experiences of Swiss, German, and Turkish immigration policies. As a relatively recent immigration destination, Türkiye faces challenges and the resultant struggles between regulating immigrants and public sentiments. The central objective of this exploration of past political dynamics aims to demonstrate the paths to be learned regarding policy-making for Türkiye, where Turkish experiences are not only new but are also marked by new legislation such as the 2013 Law on Foreigners and International Protection (YUKK). While YUKK regulates immigration, it does not offer integration policies. This analysis situates Türkiye's immigration experiences in a broader context by looking at the successes and shortcomings of Swiss and German immigration policies. More importantly the study presents crucial insights for Türkiye's policy framework, which views immigration as a temporary phenomenon. Nevertheless, the inception of the Syrian conflict in 2011 revealed Turkish society to have enacted significant public scrutiny regarding immigration. Turkish immigration experiences at this point in time overlook integrationist policies comparable to the past Swiss and German assumption that someday immigrants will return home. The analysis based on insulation theory shows that starting integration policies is the first step to Turks acknowledging their own country as an immigration country. The central question of the analysis is how Türkiye's immigration policies have evolved to address long-term integration challenges by drawing on comparative lessons from Swiss and German immigration experiences. One important finding from the analysis is that the Turkish government relies on short-term regulative legislation similar to the historical Swiss and German immigration policies. This approach renders Türkiye unable to accept itself as a permanent immigration country, thereby underlining the importance of adopting comprehensive social integration policies.

**Keywords:** immigration, integration, Switzerland, Germany, Türkiye, refugees

**Öz:** Bu makalede, İsviçre, Almanya ve Türkiye'nin göç politikalarını inceleyerek, göç politikalarının önemini değerlendirmek için karşılaştırmalı bir analiz gerçekleştirilmiştir. Nispeten yeni bir göç konumu olan Türkiye, göçmenleri düzenleme ve kamuoyu tepkileri arasında mücadele ederek zorluklarla karşı karşıyadır. Geçmiş siyasi dinamiklerin incelenmesinin temel amacı, Türkiye'nin politika oluşturma sürecine ilişkin öğrenilecek yolların olduğunu göstermektir; zira Türkiye'nin göç deneyimleri yalnızca yeni değil, aynı zamanda 2013 tarihli Yabancılar ve Uluslararası Koruma Kanunu (YUKK) gibi yeni mevzuatlarla da şekillenmiştir. YUKK göçü düzenlese de, uyum politikaları sunmamaktadır. Bu analiz, Türkiye'nin göç deneyimlerini İsviçre ve Almanya gibi ülkelerin göç politikada başarı ve eksikliklerine bakarak daha geniş bir bağlamda konumlandırmaktadır. Daha önemlisi, bu analiz, göçü geçici bir olgu olarak gören Türkiye'nin politika çerçevesi için önemli iç görüler sunmaktadır. Bununla birlikte, 2011'de Suriye çatışmasının başlaması, Türk toplumunun göç konusunda ki önemli eleştirisini ortaya çıkarmıştır. Bu noktada, Türkiye'nin göç deneyimleri, İsviçre ve Almanya'nın geçmişteki varsayımlarına benzer şekilde, göçmenlerin bir gün geri

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döneceği düşüncesiyle entegrasyon politikalarını göz ardı ettiğidir. İzolasyon teorisine dayalı bu analiz, entegrasyon politikalarına başlamanın, kendi ülkemizi bir göç ülkesi olarak kabul etmenin ilk adımı olduğunu göstermektedir. Analizin temel sorusu, Türkiye'nin göç politikalarının İsviçre ve Almanya göç deneyimlerinden alınan karşılaştırmalı dersler temelinde uzun vadeli entegrasyon zorluklarını ele almak üzere nasıl geliştiğidir. Analizin önemli bir bulgusu, Türk hükümetinin İsviçre ve Almanya göç tarihinin benzeri şekilde kısa vadeli, düzenleyici mevzuatlara güveniyor olmasıdır. Bu yaklaşım Türkiye'nin kendini kalıcı bir göç ülkesi olarak kabullenmesini engellediği için, kapsamlı sosyal entegrasyon politikaları benimsemesinin önemini vurgulamaktadır.

**Anahtar Kelimeler:** göç, uyum, İsviçre, Almanya, Türkiye, mülteciler

## Introduction

Prominent leaders such as Angela Merkel, David Cameron, and Nicolas Sarkozy, are known during their tenures in the past decades to have been publicly critical of failed social cohesion in their respective countries due to failed integration policies. While immigration is considered crucial for economic reasons, such nations have been seeking out ways to promote diversity instead of social fragmentation and tension. This sentiment has been echoed by newer leaders such as Emmanuel Macron in France, Giorgia Meloni in Italy, and Geert Wilders in the Netherlands who have called for stricter immigration controls and stronger national identity policies. Such criticisms may be indicative of a growing trend in the debate over national security, social harmony, and immigration policies. Immigration has also contributed to public unrest in Türkiye, for example, a public protest erupted on July 1, 2024 in the city of Kayseri following allegations that a Syrian immigrant had assaulted a young Syrian child in his shop (Kaya, 2024). This incident incited public tensions and has led to widespread unrest, demonstrating the fragile nature of Türkiye's immigration challenges. On a similar note, the former Minister of Foreign Affairs Mevlüt Çavuşoğlu suggested in 2018 that the Turkish state might consider normalizing relations with Bashar Al Assad (*Milligazete*, December 16, 2018), which provoked the Syrian Freedom Army to protest by taking down and burning Turkish flags in Northern Syria. The situation repeated itself when President Recep Tayyip Erdogan reiterated the intention to normalize relations with Assad recently on July 1, 2024, resulting again in Syrian Freedom Fighters burning Turkish flags (*Euronews*, June 28, 2024). During this time, the Turkish political arena has witnessed the emergence of new political parties, with the *Zafer Partisi* [Victory Party] standing out by capitalizing on public discontent with immigration.

Western countries, primarily liberal-democratic and post-industrial ones, have played a leading role in developing and evaluating immigration as well as integration policies. These nations' experiences in policy-making have over time allowed them invaluable insights that have improved governance regarding prioritizing integration policies. According to Antje Ellerman (2021, p. 47) once European countries accepted

having become permanent immigration countries, integration policies became real policies. Contrary to Swiss and German experiences, Turkish immigration policies may be labelled as regulatory ones ordained in the *Yabancılar ve Uluslararası Koruma Kanunu* [2013 Law on Foreigners and International Protection] (YUKK), which is considered to be the most modernized immigration law in Turkish history (Baykal & Yılmaz, 2020, p. 643). The definitional difference between European countries' policy experience on immigration and Türkiye's is how they prioritized areas of integration, whereas Türkiye's policies have revolved around the temporariness of immigration and thus are regulatory efforts. YUKK can be compared to the historical regulatory frameworks in Switzerland and Germany, which had similarly prioritized control and regulation of immigration in particular with no focus on integration. In Germany, the 1965 Aliens Act was devised to manage only the entry of guest workers, much like YUKK today, which regulates the stay and employment of foreigners while treating immigration as a temporary phenomenon. Switzerland's 1931 Federal Law on the Stay and Settlement of Foreigners also focused on controlling the labor market and the presence of foreign workers without addressing long-term integration.

In an era where immigration poses substantial political challenges, the formulation of effective policies is critical (Casarico et al., 2015, p. 673), as a lack of such policies not only determines the integration of immigrants but also affects national security, the health of labor markets, social cohesion, and the political landscape. Understanding the importance of policymaking not only for regulating immigration but also for drawing insights from diverse national experiences is essential for decision-making in critical multifaceted areas (Halla et al., 2012, p. 15). Western countries are currently experiencing a significant evolution in both aspects of policymaking, and policy frameworks for managing persistent migratory waves and the rise of extreme-right movements are important (Eatwell & Mudde, 2004, p. 1). These challenges demonstrate the urgency of developing effective policy frameworks, especially given projections of increasing immigration in the coming decades.

The development of immigration policies shows a variation in importance across different historical periods in Western countries, as the Industrial Revolution was a significant catalyst for human mobility driven by economic opportunities as people sought employment (Heifetz & Jaffe, 2023, p. 219). Most theories on immigration emphasize the economic dimension of migration policies, which have often been crafted in response to labor demands. Comparing the Turkish experience with that of Western countries reveals notable differences. Historically, Türkiye has been more of an emigration country, with Turkish citizens migrating to Western Europe, particularly during the mid-20th century, and contributing significantly to labor markets in such countries as Germany, the Netherlands, Belgium, and France (Kirişci,

2007, p. 16). However, Türkiye's role in global migration shifted dramatically post-2011 due to the Syrian civil war (Aksu et al., 2022, pp. 1–2).

Since 2011, Türkiye has become a major recipient of refugees, primarily from Syria, with official statistics indicating approximately 3.5-4 million Syrian refugees having been taken in under temporary protection (Directorate of Immigration Management, 2024), making Türkiye one of the largest refugee-hosting countries globally (Yavcan, 2016, p. 1). Unlike Western countries that have experienced immigration waves incrementally over extended periods, Türkiye faced the mass migration of millions from war-torn areas in a short burst of time. As a signatory to the UN Refugee Convention, Türkiye applies what is called a geographical limitation for accepting refugees from Europe only as eligible for full refugee status (Kır, 2017, p. 6). This stipulation means that Syrians and other non-European refugees in Türkiye are classified under temporary protection status rather than as conventional refugees (Rygiel et al., 2016, p. 316). Because the geographical limitation was a common practice during those days, Türkiye was also quite aware of the disadvantages of a probable mass migration from disadvantaged countries in the East (Parlak, Şahin, 2015, p. 70). This temporary status presents several challenges, as Syrian refugees in Türkiye cannot become asylum seekers under Turkish law, thus limiting their rights and long-term stability. These constraints create significant social, economic, and political issues within Turkish society, which has not developed the extensive support systems seen in many Western countries with more experience in integrating refugees and immigrants. It also shows Türkiye's approach to refugee management to focus more on short-term solutions rather than long-term integration, which is not without inherent dangers, as these challenges have become more and more visible in areas where Syrian refugees are more salient and exert pressure on Türkiye's economic resources (Uzun, 2015, p. 107) and social services. This has spurred debates about national identity, integration, and the limits of Turkish hospitality.

## Methodology

This article conducts a political-historical discourse analysis by employing insulation theory (Ellermann, 2021, p. 21) and using the comparative case study method. This study takes a broader approach by analyzing the existing immigration policies under the three different national contexts of Switzerland, Germany, and Türkiye and compares the policy trajectories across these different countries that have not combined various methodologies under a single system. Switzerland and Germany have been chosen as cases because they provide a valuable comparison for Türkiye due to their similar historical trajectories as non-traditional immigration countries. Unlike settler countries such as the United States of America, Canada, and the

United Kingdom, whose immigration policies were shaped by a foundational need for immigration to build their nation-states, Switzerland and Germany only later recognized themselves as immigration countries. Both countries initially approached immigration with reactive regulatory policies, expecting immigrants to return home, much like Türkiye today. Over time, however, Switzerland and Germany have transitioned toward more comprehensive integration policies, thus offering critical insights for Türkiye as it navigates its own challenges regarding migration and integration.

This article has also chosen Switzerland and Germany as case studies because both countries have developed distinctly different approaches to policymaking regarding immigration. They also both represent unique aspects as well as commonalities, such as embracing being immigration countries, thus making them ideal case studies. None of the three countries have been considered traditional immigration countries, and all three have expected immigrants to return while facing harsh public scrutiny. All three countries are known to have started their initial policies as reactive and regulative policies, but Swiss and German policymakers have recently turned to more permanent integration policies. Switzerland has constructed a common public memory as early as the 1850s, and this has led to long dealings in experimenting with political decision-making. The Swiss attempts to address public sentiments go back and forth between integration versus assimilation. Antje Ellerman's observations that Western countries' experiences are generally built on periods of denial of being an immigration country and that this has been an obstacle to moving forward in the direction of integration policies are important to note. Ideally, a second period commences later that embraces having become an immigration country. The initial period of immigration for both countries was associated with the belief that immigration was temporary and that the immigrants at some point will return to their home countries. This period parallels the lack of integration policies. In the cases of both Germany and Switzerland, the moment they embraced being an immigrant country was also the starting point for their integration policies.

This research uses insulation theory for its framework, because unlike other immigration theories predicting policy-making efforts, insulation theory provides a matrix that delineates three distinct pressures (i.e., popular, interest group, and diplomatic) that act upon four key arenas (i.e., executive, legislative, judicial, and electoral). The theory is based on the premise that immigration theories are inadequate for explaining why and how immigration policies come into existence. Built on the theoretical framework of Ellen Immergut (2010), insulation theory emphasizes that institutions, arenas and vetoing are all connected by inherent rules and representations. This theory can be used to explain the evolutionary trajectory

of immigration policies in different democratic countries such as Switzerland, Germany, and Türkiye.

As Türkiye continues to navigate in the perilous waters of immigration policymaking, lessons from Western experiences can provide valuable insights for Türkiye's dire need to develop and execute integration policies. Given the complexity of immigration policy in democratic regimes, insulation theory stands out as one of the most novel and comprehensive frameworks of the last decade for addressing the theoretical gaps in immigration studies and offering a grounded explanation for policymaking. The discipline of immigration studies is widely acknowledged to have struggled with a lack of theoretical models capable of capturing the full scope of policymaking processes. Insulation theory has responded to this critique by providing a multidimensional framework that reflects the dynamic nature of immigration policies, thus making it relevant for analyzing policymaking under diverse democratic regimes. The theory highlights how various factors ranging from public opinion to interest group lobbying and diplomatic negotiations have impacted policy outcomes. This allows for a deeper understanding of how countries such as Switzerland, Germany, and Türkiye have approached immigration and integration over time, thus providing a more complex and layered analysis than traditional theories allow.

### Early Theories: Ravenstein's Insights Into Migration Mechanics

One of the earliest scientific accounts on migration was conducted by Ernst Georg Ravenstein, who examined migration patterns within England (Gurieva & Dzhioev, 2015, p. 101). His research revealed that a significant proportion of migrants, approximately 75%, typically moved to nearby locations, provided there were compelling reasons for doing so. Ravenstein posited that migration was predominantly motivated by economic factors, with individuals seeking enhanced living conditions and employment opportunities (Ravenstein, 1889, p. 302). This often entailed short-distance relocations. He observed that migrants progressively moved from one settlement to another as they found work, while 25% of migrants embarked on longer journeys, often to industrial port cities. These urban areas, characterized by their economic opportunities, attracted a continuous flow of new immigrants, creating what Ravenstein termed a counter-current. He also noted a lower propensity for migration among urban dwellers compared to their rural counterparts. Ravenstein concluded that, within national contexts, women migrated more frequently than men, while international migration was predominantly undertaken by individuals rather than families. Ravenstein argued immigration rather than internal population dynamics such as birth rates to primarily drive urban growth. Ravenstein's accounts of

immigration focused on domestic immigration and did not account for international immigration or the need for politics to design policies.

Karl Marx's views can be referenced for another early account. While Marx did not study immigration, his views offered a different perspective, grounding immigration strongly again in economic factors, particularly the rise of the capitalist mode of production. Marx asserted that the shift from the feudal to capitalist systems had precipitated significant rural-to-urban migration. He linked this transition to colonialism and slavery, which he viewed as catalysts for forced migrations. Marx's theory was built on the concepts of surplus value and the reserve army of labor, suggesting that in capitalist economies, workers receive less than the full value for their labor, leading to impoverishment and suppressed wages (O'Laughlin, 2021, p. 156). This economic deprivation drives workers to migrate in search of better conditions and higher pay, predominantly from rural areas to urban centers. Marx's analysis was particularly effective at explaining migrations during the historical shift from feudalism to capitalism. However, it fell short in addressing migrations driven by non-economic factors such as political oppression, warfare, and natural disasters, or the modern perceptions of the need for policymaking. His theory's focus on singular economic causation did not account for the multifaceted nature of migration, which is influenced by a combination of economic, social, cultural, and political dimensions.

Hein de Haas' (2021) influential work "A Theory of Migration: The Aspirations-Capabilities Framework" critiques the recent stagnation in migration theory. De Haas argued that contemporary studies often lack a cohesive theoretical framework and instead lean toward qualitative descriptions that fail to systematically address the associations between macrostructural factors and individual migration experiences. He emphasized the need for an integrative approach that reconciles both structural influences and individual agency in order to provide a more comprehensive understanding of migration (p. 9). De Haas also critiqued several classical migration theories for their limited scope. Meanwhile, Zelinsky's (1971, pp. 221–222) hypothesis on demographic and economic transitions acknowledged the dynamic nature of migration but insufficiently addressed socioeconomic forces. Similarly, models focused solely on economic differentials or segmented labor markets, (e.g., Piore, 1983) lack a holistic view of the structural and institutional contexts influencing migration. De Haas has advocated for a more nuanced framework that combines insights from both qualitative and quantitative research, thus bridging the disciplinary divides that have historically fragmented migration studies.

Insulation theory posits that policymakers develop strategies to shield themselves from various pressures in four distinct policy arenas: executive, legislative, electoral,

and judicial. These arenas provide different degrees of insulation from public demands and organized interest groups (Ellermann, 2021, pp. 21–22). For instance, in the executive arena, national governments and senior bureaucrats may craft policies insulated from public scrutiny, whereas in the legislative arena, the formulation of immigration policies is more exposed to public opinion and lobbying efforts. Interest group insulation occurs when policymakers distance themselves from the influences of organized groups advocating for more liberal immigration policies. This is particularly relevant in neo-corporatist systems, where business interests exert significant pressure due to their financial and organizational advantages. Diplomatic insulation involves managing the conflicting demands from both migrant-sending and receiving countries through diplomatic channels to minimize external pressures on immigration policy. In the electoral arena, public opinion exerts considerable influence, especially in democracies where anti-immigration sentiments driven by economic and cultural concerns are prevalent. Conversely, the judicial arena offers a degree of insulation, with courts capable of overturning policies deemed unconstitutional, as has been the case in Switzerland and Germany. However, the degree of insulation provided by these arenas varies across different political contexts, thus affecting how immigration policies are shaped and implemented. One important aspect not encountered in early theories is immigration as a security threat. The fact that a shift in perception has occurred under the influence of issues such as rising nationalism, terrorist attacks, economic concerns, integration challenges, and political manipulation must be taken into account. The securitization of immigration is known to lead to restrictive policies, increased surveillance, social division, and economic impacts.

### **Securitization of Immigration**

One counter-conceptualization over the last two decades involves the emergence of the securitization of migration having become an existential threat within the scope of urgent and extraordinary policies. Externalization of migration controls (Muftuler-Bac, 2022, p. 293) in its most general sense includes cross-border state actions aimed at preventing migration. With the construction of migration as a threat and its transfer to the security area, measures put forward in migrant-sending and transit third countries have been used in an attempt to solve the issue at its source by preventing it before immigrants reach the recipient borders. This enables extraordinary measures to be handled outside the boundaries of referencing a threat through the use of force when necessary, making tragic consequences more likely in terms of the humanitarian dimension of migration.

Türkiye declared on March 20, 2016 that it will take back migrants who have illegally entered EU borders through Türkiye in accordance with the EU-Türkiye



Readmission Agreement, which had been enacted in 2013 (Aka & Özkural, 2015, pp. 256–260). This agreement was created on the basis of preventing irregular migrants from trying to cross to Greece through Türkiye. Since March 20, 2016, all irregular migrants who've reached the Aegean islands by means of Türkiye and who had not applied for international protection or who had applied but were rejected are to be returned to Türkiye. Under the one-to-one formula, for every Syrian returned to Türkiye, one Syrian from Türkiye will be resettled in the EU (Turkish Ministry of Foreign Affairs, 2016). One of the main reasons why the Turkish government made the deal was the provision of visa liberalization for its own Turkish citizens into the EU to be accelerated, provided that the issues in the visa liberalization criteria were met (Heck & Hess, 2017, p. 44). From the EU's point of view, irregular crossings from Türkiye's borders to Greece needed to be minimized, and from Türkiye's point of view, financial aid worth 6 billion Euros was to be realized for Syrians under temporary protection, as well as travelling facilities for Turkish citizens. The financial support for Syrian refugees under protection was to be spent on areas such as health, education, and nutrition, with no mention of any integration programs. While Türkiye's success was largely limited to obtaining financial resources, no gain was achieved regarding the rights of Turkish citizens to travel without a visa in EU countries.

## **Approaches to Immigration Policies in Switzerland**

Switzerland's approach to immigration transitioned from open borders in the 19th century to more controlled and rotational policies in the 20th century. This shift was driven by the challenges of preventing permanent settlement and not having to integrate large numbers of foreign workers into Swiss society. One notable policy was the rotational model, which allowed immigrants to work in Switzerland for a fixed period, typically three years, before requiring them to return to their countries of origin (Yeung, 2016, p. 723). The rotational labor policy had been developed in response to labor immigrants during industrialization in the 1850s and was aimed at managing foreign workers' contributions to the economy without allowing them to settle permanently. The aim of this approach was to prevent "overforeignization," namely the excessive influence of foreign elements on national identity (Skenderovic, 1945, p. 210).

In the 1940s and 1950s, the rotational labor policy effectively prevented the permanent settlement of foreign workers, despite the high costs for employers associated with workforce turnover (Ellermann, 2021, p. 29). In the 1960s and 1970s, Switzerland's immigration policy faced challenges due to increased competition for labor within Europe and domestic political pressures. The government responded by expanding rights for Italian workers while restricting the admission of new foreign

workers. In response to rising public concern over the impact of immigration, the Swiss government initiated an investigation into what was termed the “Foreignization Danger” (Hoffmann-Nowotny, 1995, p. 303).

In 1964, Italy’s successful pressure on Switzerland led to the Federal Council announcing revisions to the Swiss-Italian agreement on migrant workers, which sparked significant public debate (Mayer, 1965). Anti-immigrant movements such as the Zurich-based *Schweizerische Volksbewegung gegen die Überfremdung*<sup>1</sup> emerged, portraying the Federal Council as overly accommodating to Italian demands and warning of the dangers posed by excessive foreignization (Fagetti, 2016, p. 9). To prevent a potential referendum against the revised agreement, the Federal Council pledged to reduce the number of worker admissions and tighten border controls.

To further address public concerns, the government implemented the double ceiling system in 1965. This system limited the total number of foreign workers employed by any single company and reduced the permanent foreign workforce by 5% while also decreasing new admissions by 40,000. In 1965, the Zurich-based Democratic Party, a small nationalist faction, gathered 60,000 signatures for the Overforeignization Initiative, which called for reducing the foreign population to 10% of the total population. Responding to both growing employer opposition to the double ceiling system and the threat of public initiatives, the Federal Council announced a further 5% reduction in the foreign workforce in 1966. Despite diminishing support from influential interest groups and the public, the government continued to enforce restrictive numerical controls to address societal demands. To stabilize the situation, the Federal Council proposed a general quota system, which differed from previous limitations by capping new migrant admissions annually based on expected departures. While cantons and employers opposed this system, trade unions supported it, and the government assured the public it would provide stability.

The 1970 referendum, which became a pivotal moment in Switzerland’s post-war history, saw record voter turnout with 74% participation (Ellerman, 2021, p. 97). 54% of voters rejected the proposal to reduce the foreign population to 10%, leading to the general quota system being adopted and ending market-driven labor recruitment. This satisfied trade unions and the public by effectively limiting immigration. Despite the politically challenging nature of implementing the general quota system, which significantly impacted employer associations (Switzerland’s strongest interest

1 Swiss People’s Movement Against Over-Foreignization. This organization was a political movement established in 1971 with the sole focus on limiting immigration, especially from non-European countries. The political movement does not exist anymore but has become an ideological foundation for new extreme-right parties in Switzerland.

group within its liberal corporatist framework), notable changes had occurred by 1975. The number of issued permits decreased from 70,000-50,000. The oil crisis further reduced the number of seasonal and annual workers, as authorities ceased issuing and renewing permits. This marked the first decline in Switzerland's foreign population since the early 1950s.

By the late 1980s, the general quota system faced scrutiny as European integration accelerated (Christin & Trechsel, 2002, p. 416). Switzerland, along with other European Free Trade Association (EFTA) members, was invited to join the European Economic Area (EEA), which advocated for the free movement of goods, people, services, and capital. Swiss authorities recognized that its quota systems were incompatible with the EEA's fundamental principles of free movement. During negotiations, EU countries with significant labor exports such as Portugal and Spain rejected Switzerland's low legal status for seasonal workers (Fischer et al., 2002, p. 168). Consequently, Switzerland had to consider discontinuing its seasonal worker program in order to align with European integration. Faced with the European Commission's ultimatum of all-or-nothing membership, the Swiss People's Party (SVP) initiated a counter-movement, sparking debates on cultural proximity. Switzerland's strategic approach aimed to merge the right to free movement with the concept of cultural proximity, gaining public support through a referendum. The implementation of the Three Circles Policy in 1991 and the subsequent Two Circles Policy in 2008 reflected Switzerland's attempts to align its immigration policies with European integration while addressing domestic concerns about immigration (Gross, 2006, p. 21).

The First Circle included citizens from the European Union (EU) and the European Free Trade Association (EFTA); these people were granted the privilege of free movement and employment opportunities in Switzerland, thus reflecting the country's economic and cultural ties to Europe (Barker-Ruchti et al., 2015, pp. 1217-1225). The Second Circle comprised nationals from countries perceived to uphold strong human rights protections, such as Yugoslavia, the USA, Canada, Australia, and New Zealand. Individuals from these countries were admitted under more restrictive conditions compared to the First Circle but were still considered favorably. The Third Circle consisted of nationals from all other countries, who were largely excluded from entering Switzerland except under refugee status (Barker-Ruchti et al., 2015, p. 1217). This exclusion reflected a clear ethnic and cultural dimension, distinguishing between groups based on perceived cultural distance and compatibility with Swiss society.

Despite implementing an annual cap, the Three Circles Policy did not halt the growth of immigration, which had reached 18.4% (Ellermann, 2021, p. 98). By

1998, the Federal Council officially abandoned the Three Circles model in favor of the Two Circles Policy, which prioritized the admission of individuals based on their professional qualifications rather than their cultural or geographic origin. In devising the Three Circles Policy, the Federal Council had appeared to prioritize populist demands over the interests of the business sector. The subsequent Two Circles Policy explicitly favored highly skilled labor, thus aligning more closely with economic needs. This policy shift marked a departure from the quota system that had been in place since the 1950s, liberalizing entry procedures for EU workers while initiating a targeted search for highly qualified professionals. Between 1996-2006, the proportion of economic migrants among primary immigrants increased from 19% to 37%, and the proportion of highly skilled individuals within this group doubled. The long-term viability of this new policy depended on the assumption that both flows of immigrants would remain modest, thus appeasing public concerns about immigration while aligning with the trend towards prioritizing highly skilled European workers. The 2008 legislation repealed the 1931 law, formalizing the prioritization of European workers and the exclusionary stance toward non-EU countries (Hotzy et al., 2019, p. 74). Between 2006-2015, immigration surged by 50%, driven by the influx of Germans and other Europeans, as well as the rise of populism (Ellermann, 2021, p. 123). In 2014, Switzerland faced a critical referendum on halting immigration from EU countries.

**Table 1<sup>2</sup>**

*Analysis of Switzerland Based on Antje Ellerman’s Theoretical Framework*

	<b>Popular Insulation</b>	<b>Interest Group Insulation</b>	<b>Diplomatic Insulation</b>
<b>Executive arena</b>	Low	Low	Low
<b>Legislative arena</b>	Low	Low	High
<b>Electoral arena</b>	Low	Medium	High
<b>Judicial arena</b>	Medium	Medium	High

In the legislative arena in Table 1, while popular and interest group insulation is low, a high degree of diplomatic insulation is observed, where relations with Italy and the EU played a crucial role in shaping immigration policy outcomes. By displaying a

2 The tables presented in this article analyze immigration policies using a categorization of low, medium, and high across four key pressure points. This categorization follows the framework used by Antje Ellermann (2021), which allows for a structured comparison of immigration policy dynamics. The analysis traces the historical and political pressures that have influenced immigration policy trajectories.

low level of popular insulation due to direct democracy (referenda), a medium level of interest group insulation, and a high level of diplomatic insulation, the electoral arena indicates that both domestic political dynamics and international factors have impacted immigration policies greatly.

## **Approaches to Immigration Policies in Germany**

In contrast to Switzerland, Germany's historical trajectory has profoundly been shaped by the legacy of the Holocaust. This influence has impacted its immigration policies and responses. During the post-World War II period, German politicians, in need of industrial workers engaged in competition with other industrialized nations to attract European and non-European guest workers (Martin, 2002, p. 17). Unlike Switzerland, however, Germany did not adopt rotational policies for non-Western immigrants. The German authorities initially believed that state interests would take precedence over individual rights, allowing them to send immigrants back when deemed necessary (Ellermann, 2021, pp. 239–240). However, the rule of law in a democratic context made the forced repatriation of immigrants unfeasible (Kalicki, 2020, p. 712).

The German immigration experience has diverged fundamentally from that of Switzerland, as Swiss policies were significantly influenced by the country's direct democracy and a deep-seated fear of cultural dilution. In contrast, Germany's approach was driven by the need to address and correct the historical stigma associated with the Holocaust (Feindt, 2017, p. 556). German politicians were initially overly confident in their ability to halt immigration altogether, and this led to a delay in the implementation of social and cultural integration policies. This need became increasingly evident during the 1980s. The establishment of the Ministry of Immigration in 1986 marked a pivotal moment when Germany officially acknowledged its status as an immigration country (Bauer et al., 2004). This recognition underscored the need to addressing the cultural and linguistic needs of economic immigrants and prompted the question of what integration would mean for minority groups residing in Germany.

The post-war economic boom (*Wirtschaftswunder*) in the 1950s necessitated additional labor, leading the Adenauer government to establish a recruitment agreement with Italy in 1955 to strengthen economic ties and address worker shortages (Borkert & Bosswick, 2011, p. 96). However, the construction of the Berlin Wall in 1961 halted the flow of East German labor. To compensate, Germany signed labor agreements with Spain (1960), Türkiye (1961), Portugal (1964), and Yugoslavia (1968; see Borkert & Bosswick, 2011, p. 96). These agreements were primarily driven

by the Christian Democratic Union Party (CDU), while the Social Democratic Party (SPD) and trade unions initially viewed immigrants as competitors for jobs. The worker recruitment programs initiated by Minister of Labor Blank, aimed not only to boost West German industry but also to strengthen European integration and reshape global perceptions of Germany (Rothberg, 2014, p. 123).

During the peak of labor migration in 1973, 2.6 million *Gastarbeiter* (guest workers) were perceived as foreigners despite their permanent resident status. The German government has faced ongoing challenges in integrating non-ethnic Germans and highly skilled workers, moving away from traditional concepts of citizenship. The period between 1945-1949 saw approximately 12 million refugees relocate to West Germany, primarily from East Germany as a result of the economic revival and their ethnic backgrounds. This facilitated relatively smooth integration. Additional migration occurred between 1949-1961, with about 3.8 million Germans moving from East to West Germany. Even after the construction of the Berlin Wall, another 400,000 Germans moved westward. Between 1950-1987, about 1.4 million more migrated to West Germany. Following the fall of the Iron Curtain, over 1 million ethnic Germans emigrated from the former Soviet Union, Poland, and Romania between 1988-2003 (Ellermann, 2021, p. 359).

These policies, however, did not facilitate the acceptance of non-European workers as permanent residents. The agreement with Türkiye included a worker rotation clause, which was unique and not applied to the treaties with Italy, Spain, or Greece. The business community quickly rejected the rotation idea due to the costs associated with repatriating workers, which Switzerland had experienced. Also, the costs of recruiting and training new workers made permanent immigration more feasible. Before 1978, local authorities had the discretion to grant residency to immigrants. The 1965 law centralized this authority, transferring it to federal states to prevent discriminatory practices. The economic recession and the 1973 oil crisis intensified scrutiny of social migration. Unemployment surged from 105,743 in August 1966 to 673,572 in February 1967 (Nagle, 1970, p. 50). This economic downturn, combined with the ideological consolidation under the SPD and CDU's grand coalition, enabled the National Democratic Party (NPD) to gain traction in Hesse and Bavaria, advocating for the prioritization of the German workforce over immigrants. By the 1970s, the Turkish community had become the largest immigrant group in Germany, surpassing Italians and Yugoslavs. The recession of 1973 significantly impacted the export-oriented economy, resulting in half a million unemployed Germans. This social and economic complexity compelled the government to halt foreign worker recruitment (*Anwerbestopp*) in November 1973 (Davy, 2005, p. 123). Contrary to popular belief,

this decision was driven by the realization that the guest worker program was not cost-effective rather than directly by the 1973 Arab oil embargo.

By the end of 1971, Italy, Spain, Greece, Türkiye, and Yugoslavia accounted for almost 1.8 million migrants in Germany concentrated in North Rhine-Westphalia, Baden-Württemberg, and Bavaria. Studies indicated that 28% of these immigrants had resided in the Federal Republic for at least seven years, and many were living with their families, which strained the social infrastructure. The Ministry of Labor set a deadline (*Stichtag*) of November 13, 1974 to limit the future issuance of work permits to children of foreigners (Spicka, 2013, p. 346). Furthermore, childcare compensation for foreigners was reduced, and neighborhoods with high foreigner populations were declared off-limits to new non-German settlers. These measures were categorized under labor policies and reflected West Germany’s reluctance to see itself as an immigration country (Green, 2013, p. 24). Despite these policies, flexibility in family reunification was allowed to address social aspects. By the late 1970s, integration became the government’s primary strategy, transitioning from a business-oriented to a socially inclusive approach (Schmidt, 1987). Social science research was promoted in order to better understand the social dimensions of the guest worker program. During the mid-1970s, all major political parties began advocating for integration. While supporting cultural preservation, the CDU aimed for a temporary integration that would eventually lead to migrants returning to their countries of origin. Advocating equal rights and protections, the FDP took a nuanced stance, while the SPD viewed integration as a bilateral process that required both foreigners and Germans to adapt to one another. According to Kohlmeier et al. (2006), the 2005 Policy Analysis Report on Migration and Asylum indicated the 2005 Skilled Immigration Act to have marked a significant development facilitating the entry of skilled workers from outside the EU.

**Table 2**

*Analysis of Germany Based on Antje Ellerman’s Theoretical Framework*

	<b>Popular Insulation</b>	<b>Interest Group Insulation</b>	<b>Diplomatic Insulation</b>
<b>Executive arena</b>	High	Low	Low
<b>Legislative arena</b>	High	Medium	Low
<b>Electoral arena</b>	Medium	Medium	High
<b>Judicial arena</b>	Medium	High	Medium

Germany's executive arena is characterized by high popular insulation, low interest group insulation, and low diplomatic insulation, where policy decisions are influenced by public opinion rather than by interest groups or international pressures. As with the Swiss situation, the corporatist nature of the country has allowed the corporate world great influence on the executive arena. In the legislative arena, popular insulation is high, interest group insulation is medium, and diplomatic insulation is low, meaning that public opinion is the most important. The electoral arena displays medium levels of popular and interest group insulation and high diplomatic insulation, showing that both domestic political dynamics and international factors impact immigration policies.

### **Does YUKK Embrace Integration Policies?**

YUKK was enacted in Türkiye in 2013 and represents a significant development in the country's approach to managing the status and rights of foreigners and refugees. This legislation aligns Türkiye more closely with international asylum standards and in particular reflects the influences from the EU's legal framework. However, YUKK also reveals unique adaptations that reflect Türkiye's specific geopolitical and socioeconomic context (Göksel, 2015, p. 76). YUKK delineates three categories of international protection: refugee status, conditional refugee status, and subsidiary protection. These classifications are crucial in understanding how Türkiye navigates its obligations under the 1951 UN Refugee Convention while maintaining its geographical limitation to European refugees. Due to this geographical limitation, one holdover from the original terms of the 1951 Convention means that Türkiye does not grant full refugee status to those fleeing conflicts or persecution outside Europe.

This geographical limitation is a critical point of divergence from the UN Refugee Convention, which broadly defines refugees without regard to their country of origin (Glynn, 2012, p. 142). By maintaining this exception, Türkiye strategically positions itself to manage the immense traffic of refugees from neighboring non-European regions without committing to the same integration and resettlement responsibilities it would bear for European refugees. The introduction of the temporary protection regime under YUKK primarily addresses the Syrian refugee crisis (Yavuzekinci & Gursoy, 2022, p. 4). This framework provides immediate, albeit limited, relief to millions of displaced Syrians, offering them temporary residence and access to basic services such as healthcare and education. However, the term "temporary" fundamentally limits the long-term prospects for these individuals. Unlike traditional refugee status that can lead to permanent residency or citizenship, temporary protection is inherently provisional. This status results in a precarious existence, one where refugees are constantly facing potential repatriation and are often excluded from fully integrating into the host society.



Temporary protection holders in Türkiye have restricted access to the formal labor market, a policy that curtails their economic self-sufficiency and long-term stability. They often find themselves working in the informal sector, where they are vulnerable to exploitation and lack legal protections (Long, 2013, p. 15). This not only affects their personal economic opportunities but also hinders their ability to contribute formally to the Turkish economy. In contrast, the UN Refugee Convention promotes a more permanent and integrated approach to refugee protection. It encourages host countries to offer refugees the possibility of long-term settlement and integration into the socioeconomic fabric of society. Bound by the Convention without geographical limitations, many Western nations have developed robust systems to facilitate the integration of refugees, including comprehensive support services, language training, and access to the labor market. The temporary nature of the protection offered to most non-European refugees does not encourage a long-term investment in integration efforts by either the government or the refugees themselves. This policy creates a societal divide where refugees remain on the periphery of Turkish society, thus affecting their quality of life and limiting their potential contributions (Memişoğlu & Yavçan, 2022, p. 5).

The establishment of the Directorate General of Migration Management (DGMM) under YUKK signifies Türkiye's commitment to a more organized and centralized management of migration issues (Göksel, 2015, p. 76). This institutional development is a positive step toward improving the administrative aspects of refugee and migration management. However, the DGMM's role is predominantly regulatory and administrative rather than integrative. The societal implications of YUKK are profound. Türkiye's decision to emphasize temporary protection over permanent integration reflects broader sociopolitical considerations. The country faces significant economic pressures, political challenges, and social tensions stemming from hosting a large refugee population. Furthermore, the temporary status and limited integration opportunities exacerbate social tensions and hinder cultural assimilation. Refugees under temporary protection are often seen as a burden rather than as potential contributors to society. This perception can lead to increased xenophobia and social unrest, making refugees' ability to integrate and the host society's ability to accept them more challenging.

YUKK represents a pragmatic approach to an overwhelming refugee crisis. While it does provide immediate relief to millions of displaced individuals, it falls short of offering a path to long-term stability and integration for non-European refugees. By maintaining a policy of temporary protection, Türkiye has managed to address the urgent needs of refugees without fully committing to their permanent settlement. However, this approach comes at a cost, both for the refugees who

remain in a state of uncertainty as well as for Turkish society, which misses out on the potential benefits of fully integrating these new members. When comparing Türkiye’s approach under YUKK to the principles of the UN Refugee Convention and Western integration practices, while Türkiye has made strides in providing for refugees, significant gaps evidently remain in terms of promoting their long-term integration into society. Moving forward, a balanced policy that addresses both immediate humanitarian needs as well as facilitates long-term integration would be beneficial for both refugees and Turkish society as a whole.

**Table 3**

*Analysis of Türkiye Based on Antje Ellerman’s Theoretical Framework*

	<b>Popular Insulation</b>	<b>Interest Group Insulation</b>	<b>Diplomatic Insulation</b>
<b>Executive arena</b>	High	Medium	High
<b>Legislative arena</b>	High	High	High
<b>Electoral arena</b>	Medium	High	High
<b>Judicial arena</b>	High	High	High

Türkiye’s executive arena is characterized by high popular, medium interest group, and high diplomatic insulation, suggesting that policy decisions are insulated from public opinion and international pressures but moderately influenced by interest groups. The 2023 Presidential elections demonstrated that the highly agitated public debates on immigrants and the new rise of the populist Victory Party were nowhere near sufficient to influence the outcome of the Presidential elections. In the legislative arena, high levels of popular, interest group, and diplomatic insulation indicate that policy outcomes are insulated from public opinion, interest groups, and international factors. The electoral arena, with medium popular insulation, high interest group insulation, and high diplomatic insulation, shows that domestic political dynamics are moderately insulated while international and interest group influences are strong. With high levels of popular, interest group, and diplomatic insulation, the judicial arena suggests that legal decisions are heavily insulated from all external pressures. The complex interplay of these insulation factors determines the openness or restrictiveness of immigration policies.

**Table 4**

*Comparative Overview of Insulation Levels Across Switzerland, Germany, and Türkiye*

<b>Arena</b>	<b>Switzerland</b>	<b>Germany</b>	<b>Türkiye</b>
Executive Arena	Low (Popular, Interest, Diplomatic)	High (Popular), Low (Interest, Diplomatic)	High (Popular, Interest, Diplomatic)
Legislative Arena	Low (Popular, Interest), High (Diplomatic)	High (Popular), Medium (Interest), Low (Diplomatic)	High (Popular, Interest, Diplomatic)
Electoral Arena	Low (Popular), Medium (Interest), High (Diplomatic)	Medium (Popular, Interest), High (Diplomatic)	Medium (Popular), High (Interest, Diplomatic)
Judicial Arena	Medium (Popular, Interest), High (Diplomatic)	Medium (Popular), High (Interest), Medium (Diplomatic)	High (Popular, Interest, Diplomatic)

Switzerland shows generally low insulation in most arenas, with a higher level of diplomatic insulation, especially in the legislative, electoral, and judicial arenas. This suggests a governance model that prioritizes consensus-building and stability over direct public engagement. As indicated in the above paragraphs, this situation directly correlates with the fact that Switzerland recognizes referenda and thus direct public involvement. The Swiss model emphasizes direct democracy through referenda, which may account for the limited influence of interest groups, as policy decisions are made through popular votes rather than negotiations. The country relies on expert-driven policy formulation rather than direct public involvement.

Germany has high popular insulation, particularly in the executive and legislative arenas, and lower diplomatic insulation compared to Switzerland. The low interest and diplomatic influence suggest a potential disconnect between political elites and interest groups, leading to a scenario where popular sentiment may not always translate into policy action. This could reflect a structural rigidity in the German political system, where established parties dominate the legislative process, often side-lining emerging interest groups. Even though German integration policies are federal, the content and execution of policies take place on local governance levels. Interest group insulation for both countries is medium to high in most arenas.

Türkiye demonstrates a high level of insulation across all categories and arenas, indicating a more isolated political environment regarding the popular, interest group,

and diplomatic factors. The Turkish political regime shows medium popular influence alongside high diplomatic engagement, which creates an electoral landscape distinct from the German federal system and moving beyond the direct referenda model seen in Switzerland. While Germany and Switzerland have adopted immigration models that prioritize skilled individuals and intensive integration programs, Türkiye's experience has been shaped by the mass migration of Syrian civilians compelled to flee their homeland due to civil war. However, Türkiye still lacks a comprehensive integration policy for addressing the societal challenges arising from this forced mass migration.

## Conclusion

In conclusion, while the nature of immigration waves to Switzerland, Germany and Türkiye varies, the fact that the essence of immigrant psychology (i.e., seeking safety in economic, political, and social milieus) remains consistent is important to note. While immigration to Switzerland and Germany is often economically motivated, immigrants to Türkiye primarily come from war-torn areas, making integrationist policies equally necessary. The above analysis has shown the influence of the four arenas (i.e., executive, legislative, electoral, judicial) in Switzerland, Germany, and Türkiye. The use of insulation theory has demonstrated the high influence of executive pressure in Türkiye compared to the other two countries, with legislative influence varying and electoral factors having a moderate role in shaping public opinion.

Insulation theory has demonstrated its ability to explain whether a country with immigration experiences may evolve into having open or closed immigration policies. Still, the theory does not account for when a country posits the need to construct immigration and integration policies. The theory allows the study and construction of a historical analysis of immigration policies in order to reveal the critical importance of recognizing and adapting the realities of immigration countries. The analysis shows that both Switzerland as well as Germany have come to realize the need for skilled immigrants. Meanwhile neither country was able to avoid public sentiments regarding the effects of immigration. This means that both countries have had to strike a balance between economic need and public dissatisfaction. Switzerland's federal system and Germany's responses to labor demands and historical legacies have demonstrated how integration policies and governance models can construct social cohesion as well as economic prosperity.

The analyses demonstrate how the Turkish state has yet to fully embrace its evolving status as a major destination for immigrants, primarily refugees from conflict zones. Switzerland and Germany have long histories of immigration and

integration policies, while Türkiye's approach has been more reactive and short-term, particularly in the context of the Syrian crisis. The temporary protection status granted to Syrian refugees has led to fragile social, economic, and political challenges, limiting the refugees' rights and stability and creating tensions within Turkish society. If Türkiye continues to resist its identity as an immigration country and fails to implement immediate integration policies while ignoring electoral scrutiny, the consequences could be dire. The analyses show the importance of electoral sensitivity to long-term integration strategies for avoiding social divisions, economic strain, and threats to national identity. Without comprehensive policies that support both Turkish citizens and Syrian refugees, the real risk exists for societal fragmentation and increased polarization.

Moreover, signs of the rising extreme-right political movements are already present. These factions appear to exploit the immigration issue for electoral gains, thus exacerbating xenophobia and deepening societal divides. The emergence of such political leadership could destabilize Türkiye's democratic foundations and erode the principles of inclusivity and human rights. Türkiye's future stability and prosperity hinge on its ability to adapt and integrate the realities of immigration into its national framework. It has the opportunity to embrace its role as a country of immigration and develop inclusive sustainable policies. By learning from the examples of Switzerland and Germany, Türkiye can develop a proactive balanced approach to immigration. Establishing a Ministry of Integration would be a crucial step in this direction. This ministry would be tasked with policy-making and focus on creating inclusive, sustainable, and effective integration strategies that address the needs of both immigrants and the native population across the country. Such an institution could facilitate the development of policies that promote social cohesion, economic integration, and cultural understanding. Similar policies in Switzerland and Germany include long-term language courses implemented all across the country that offer a diverse set of language skills to support integration. These courses not only focus on language but also include discussions and debates on the norms and values of each country, such as democratic inclusiveness, equality, freedom, and adherence to laws and regulations. In such integration programs, individuals are encouraged to commit themselves to furthering their education and to consider their social, cultural, and economic contributions to society.

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