

Bulgaria and Italy as Migration Gates to Europe: Comparative Analysis

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Abstract

The world is becoming increasingly uncertain, turbulent, and unpredictable due to dozens of factors such as global warming, military conflicts, the extraordinary health situation, the economic, financial, and social instability. All this insecurity has led to a temptation among people to flee their countries of origin in search of better living conditions, which in turn has caused unprecedented migration flows worldwide. What is more, the worsening situation in some regions in Africa and Asia, along with the Russian invasion of Ukraine, are a guarantee of even higher levels of migration. This article makes a comparison between some social, economic, and legal aspects of the asylum-seeker situation in Bulgaria and Italy, such as the most common nationality, number, gender, and age structure of asylum-seekers between 2012 and 2021, accommodation capacity, legislative framework, resource sources and provision, institutions responsible. The aim of this paper is to identify some of the existing gaps and to formulate and share recommendations. The main method used in this paper is comparative analysis. Documentary analysis, statistical

data analysis, and retrospection were also used as auxiliary methods.

Keywords: Refugees, asylum-seekers, Bulgaria, Italy, comparative analysis.

JEL: P00, P59

Introduction

During the last decade, the world faced an enormously sizeable rate of migration, caused by a large variety of disturbing factors such as military conflicts, violation, social inequalities, climate changes. This statement is proved by a number of international organizations that work in this field. For example, according to the International Organization for Migration (IOM), and more precisely their World Migration Report 2022, in 2020 there were around 281 million international migrants in the world, which equates 3.6 per cent of the global population (McAuliffe, M. and A. Triandafyllidou, 2021). What is more, a Mid-Year Trends report of the United Nations High Commissioner for Refugees (UNHCR) reveals that for the first half of 2021, there is a surge of 82.4 million people fleeing multiple ongoing conflicts around the world (Refugees, 2020).

At a regional level, the European Union (EU) is not an exception. In fact, according to the United Nations Department of Economic and Social Affairs (UN DESA), Europe is the

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largest destination for international migrants, with a total of 87 million (Nations, 2021). It should be mentioned that the relatively better weather, social and economic conditions in the EU and more precisely its geographical territory are among the reasons why it is often chosen by migrants as a final point. The last huge escalation was between 2014 – 2016, and the event that provoked that was the Syrian Civil War, which started in 2011 as part of wider Arab Spring protests. According to UNHCR, since 2010 more than 6.6 million Syrians have been forced to flee their country and another 6.7 million people remain internally displaced (“Syria Refugee Crisis Explained”, 2022), which resulted in nearly 1.3 million people seeking international protection in the EU only in 2015.

However, the upward trend that started a couple of years ago raises tensions again. Examples of events that stimulate this tendency for increasement are the Taliban takeover of Afghanistan, which started with the signing of the Doha agreement, also known as the Agreement for Bringing Peace to Afghanistan, between the United States of America (USA) and the Taliban on 29 February 2020 (Qazi, 2020), and the Russian invasion in Ukraine that started on 24 February 2022. As a result of these two unexpected scenarios, the EU faces a direct threat to its security, along with unprecedented refugee flows. According to UNHCR Operational Data Portal, more than 5.8 million people have fled Ukraine for the first two months of the war (“Situation Ukraine Refugee Situation”, 2022). Despite the fact that Bulgaria and Italy are not among the most affected countries, it should be noted that in a long term, if the war continues, there is a real chance for both of them to have to host a huge number of Ukrainian refugees, more likely for Bulgaria because of the relatively

shorter distance, the similarities between the languages and religion.

Another hot point is the Mediterranean Sea, which is a main route for refugees, both from Asia and Africa. Since the beginning of the 2014-2016 migration crisis in Europe, around 2.3 million people have crossed the sea in an attempt to reach the EU. However, far more worrying is the data related to the missing or dead people who tried to cross the sea. According to UNHCR, for the same period from 2014 to 2021 their number is almost 23 000. Another interesting fact that should be mentioned here relates to the breaking of the trend for a decrease in the number of individuals who have crossed the Mediterranean. In fact, from 2014 to 2020 a gradual decrease in this indicator is observed. Contrary to expectations, and despite all restriction measures for international travelling due to the COVID-19 pandemic, in 2021 there is a steep rise by 27 554, compared to the previous year (“Situation Mediterranean Situation”, 2022).

An additional element that makes the topic, related to the study of Bulgaria and Italy as migration gates to Europe, important is their strategic geographic location. According to the European Border and Coast Guard Agency (Frontex), there are 7 main migration routes to Europe, and both countries are located on three of them – the Eastern Land Route, the Black Sea Route, and the Central Mediterranean Route. As external EU borders and countries from which asylum-seekers enter the EU territory, the topic of comparing the conditions and the situation there becomes even more crucial. Having all this in mind, it is assumed that the two countries should be frequently included in such comparative studies by scholars and researchers, however, in fact, the availability of such is

quite limited. All that proves the relevance of the topic, which, in addition, can be safely said will become even more important given the ongoing conflict in Ukraine.

The current article presents the results of a comparative study between three main aspects of the asylum-seeker policy of Bulgaria and Italy – the legislative, economic, and social. It includes data, related to the asylum-seekers' most common nationality, number, gender, and age structure between 2012 and 2021, the accommodation capacity as part of the social policy, legislative framework, the responsible institutions, resource sources and provision as an economic aspect. In our opinion, these factors would help to clarify and better understand the situation in both countries. The aim of the study is to identify and outline some of the existing gaps in the above-mentioned aspects and to formulate recommendations to deal with them.

The main method used in this paper is the comparative analysis, which, in this paper, covers the above-mentioned issues. Documentary analysis, statistical data analysis, and retrospection were also used as auxiliary methods.

Literature and basic terms review

Logically, the beginning of the refugee related studies is set in a time when millions of people were forced to flee their countries of origin due to some disturbing circumstances such as the World Wars. An author from the 1930s who studied migration and refugee processes in Europe was Walter Adams, addressing issues such as settlement, conditions, and number of refugees, studied by country (Adams, 1939, pp. 37-44). The period around the Second World War provided an additional incentive for scholars and academic society as a whole

to work and conduct research on this topic. For example, in 1949, the Russian American sociologist Eugene Kulischer began to speak about displaced people in the modern world, referring to the evolution of refugee issues since the first half of the twentieth century (Kulischer, 1949, pp. 166-177).

Exactly the twentieth century is the age when most of the national and international organizations working with asylum-seekers and refugees were created, and key regulations and laws were issued. For example, one of the first scholars who examined the work of such an institution was Louis Holborn, who talked about the refugee problem and the work of the then active League of Nations on it (Holborn, 1939, pp. 124-135). In fact, the 1960s and 1970s were decades in which this institutional-legislative issue has continued to be the focus of scholars, as she mentions in a later study of hers (Holborn, 1975).

Serious efforts have been made since then, but one thing remains true – it is a topic that is of such a wide spectrum that, when researched, people from a large variety of fields should be included. Similar statements could be observed in other scientific papers. For example, Claudena Skran and Clara N. Daughtry say that “the scholarship on refugee studies involves a wide variety of academic disciplines, including international relations and international law, anthropology and sociology, economics, demography, geography, psychology, and history” (Skran and Daughtry, 2007).

In addition, the same thoughts are shared by Bulgarian researchers, including Albena Nakova and Yelis Erolova. In their article “*Integration by ‘Fencing’: The Case of Refugees in Bulgaria*”, they mention that „studies on migration movements are being conducted by historians, economists, sociologists,

ethnologists, folklorists, anthropologists, political scientists, and jurists" (Nakova and Erolova, 2019).

If it comes to the conduction of a comparative analysis in the field of refugees and asylum-seekers, a notable research is that of Liza Schuster, who explores similarities and differences between the asylum policy of several European governments (Schuster, 2000, pp. 118-132). On the other hand, an example of a study covering all Member States is the article of João Estevens in which he broaches Bulgaria as a country with „none or low explorational level in the field“. Moreover, Bulgaria is classified among other states that give little or no importance to migration issues in its national security and defense strategies, which lead to the conclusion that migration is probably less securitized. On the other hand, Italy is rated as a next leveler or as a medium explorer. According to the author, migration issues in Italy are „mostly explored per feedback effects as demographic changes, scarcity of natural resources, conflict or poverty can originate increasing migratory pressure“ (Estevens, 2018).

On the other hand, a valuable paper that has been published recently is that of Giuseppe (Pino) Pisicchio, a full professor at the University of International Studies of Rome, entitled *Legal Systems and Management of Migratory Flows* (Pisicchio, 2021). However, it is an example that proves the statement that Bulgaria is not among the countries of special interest to international researchers. To summarize everything said in this particular part of the article, it should be noted that the partial lack of interest confirms the importance of conducting such research.

However, today's uncertain and highly unpredictable world is a guarantee that this topic would become more and more popular

not only among scholars but authorities, non-governmental organizations (NGOs), local and international institutions. However, the work in such as specific field, in combination with the advancement of technology that allows information, some of which fake, to spread rapidly, requires good knowledge of the basic terms because as Dimitrov and Angelov announce in their article "politicians, media and state institutions very often interchange the terms, which leads to misunderstanding, tensions, and even abuses" (e.g. Dimitrov and Angelov at al., 2017).

In fact, probably the most accurate definition can be taken from international institutions working for a long time in the field. Following this logic, the UNHCR Master Glossary of Terms is worth viewing. According to it, a "migrant" is "any person who changes their country of usual residence" voluntarily, not because of any threat. Another definition important for such research is "asylum-seeker". According to the same source, an asylum-seeker is "someone who is seeking international protection but has not yet received a final decision on their claim". On the other hand, for the term "refugee", it is recommendable to check the 1951 Refugee Convention and its 1967 Protocol, which are key legal documents that form the basis of a large number of the state's legal framework around the world, including these of Bulgaria and Italy. According to them, refugees are "people who are afraid of being persecuted due to their race, religion, nationality, membership of a particular social group or political opinion, and cannot return to their country of origin".

The literature review highlighted that Bulgaria is often excluded, or at least poorly researched and rarely mentioned in comparative studies conducted by scholars. A probable reason for this is the relatively lower

number of asylum-seekers in the country than in other Member States, including Italy, which presumably does not attract the researchers. Nevertheless, on account of its strategic location as an external EU border, and as a Turkey neighbor, which provides the migrants the chance to enter both, by land and sea, the topic should not be underestimated. What is more, the misuse of terms in the mass media further exacerbates the problem, and these factors once again confirm the topicality of the topic. Once the gaps have been outlined, it's time to move on to the research itself.

Methodology

As it was noted in the very title of this paper, the main method used in this article is the comparative analysis. In its essence this method implies a choice of characteristics of given entities, collecting information about them and comparing these characteristics to one another. This analysis aims to distinguish similarities and differences between at least two entities, to outline their strengths and weaknesses and to support, when necessary, the decision-making process with some recommendations. In this case, two conditions must be met: a/ availability of information about at least two objects/cases/phenomena and b/ an attempt to explain the observed and registered state (Pickvance, 2005, p. 2).

The comparative method and its application, as well as its advantages and disadvantages, have been discussed in the context of different scientific disciplines by many authors during different times (e.g., Franz Boas, 1896, Arend Lijphart, 1971, David Collier, 1993, Hans Keman, 1993, Steven Totosy de Zepetnek, 1998, James Mahoney & Dietrich Rueschemeyer, 2003, Tim May, 2010, Reza Azarian, 2011, Mathew Lange, 2012).

Several classifications of comparative analysis, referring to the social sciences and especially political, exist. Two of the most cited ones are offered by Charles Tilly and Tom May. Tilly suggested four types of comparative analysis: individualizing – a limited number of cases is compared in order for the specifics of each case to be determined, universalizing – the comparison should identify the same rules, which are valid for certain phenomena, variation-finding – the carried out study should identify the variation in the characteristics and intensity of the phenomena based on systematic differences for each case and encompass – “places different instances at various locations within the same system, on the way to explaining their characteristics as a function of their varying relationships to the system as a whole” (Tilly, 1984, cited in Pickvance, 2005, p. 3). Tim May offered the following classification: import-mirror view, the difference view, the theory-development view and, finally, the prediction view (May 2001, pp. 249).

In addition, regarding the fact that the comparative analysis works both with quantitative and qualitative data, makes it applicable in a wide variety of fields, one of which is refugee and asylum-seeker studies, as it was mentioned in the literature review. In fact, the method is frequently used by scholars around the world working in this sphere nowadays (e.g., Memişoğlu & Yavçan, 2022; Lutz & Portmann, 2022 et al.).

Different aspects of migrant-related and especially refugee-related issues could be in the focus of a comparative analysis. For instance, it could be based on statistical information related to the number of the refugees and asylum-seekers who arrived and were registered in the appropriate manner in the countries included in the analysis. These data are usually accompanied by additional

characteristics, such as age, sex, nationality, education.

On the other hand, the existing national system in both countries, which is responsible for the development and implementation of refugees and asylum-seekers-related policy, could also be an object of a comparative analysis. It must be underlined that this is a complex system. Many and different government bodies at national and local level, as well as other organizations (e.g., NGOs), are part of it. Under the existing legislative base, including international and national legal documents, the elements of the system have their functions and in close cooperation with each other they fulfil their duties related to refugees and asylum-seekers. That is why a general comparative analysis of the elements of the system and their functions will present the current organizational state, the existing differences and the similarities in the countries studied. This comparative analysis very often is accompanied by the analysis of the legal framework, which establishes the system and determines its functioning.

The system responsible for the development and implementation of refugees and asylum-seekers-related policy functions in close interaction with other national systems in the respective country – the healthcare system, economic system, educational system. The interaction between these systems is also a possible and very interesting aspect of study.

In addition, the good functioning of the above-mentioned refugee related system is based on the good regulation about responsibilities, coordination, and communication between its elements and the elements of other systems. It also depends on the good provision of resources. These are financial, material and above all human resources and their management, including

planning, maintenance, and use. Therefore, the study of the resource aspect could also be an object of study.

There are many more aspects, and each of them could be part of an independent research and analysis. However, the current paper is based mainly on a comparison between the number of the asylum-seekers registered in Bulgaria and Italy in the ten-year period 2012-2021, gender and age distribution, resource sources and provision, mainly in terms of finances, as well as accommodation capacity, legal framework, and some institutional responsibilities. In addition to the comparative analysis, documentary analysis, statistical data analysis, and retrospection are also applied as supplementary methods.

Concerning the quantitative data related to the number of the asylum-seekers in Italy and Bulgaria, the database of the European Statistical Office (Eurostat) was used. For the other of the above-mentioned purposes, official normative documents in the field, such as laws, directives, and decisions, adopted by both countries were explored.

The study has its limitations. Even though it is a very challenging task to distinguish people who escape from their countries not to be persecuted and tortured due to “race, religion, nationality, membership of a particular social group or political opinion” and people who leave for economic reasons, the focus of the study is only on those migrants who fall under the category of refugees and asylum-seekers. The authors of the paper have tried not to study the so-called economic migrants.

Overview of the asylum-seeker situation in Bulgaria and Italy

In order to get acquainted with the significance of the issue, it is a good idea to have a look at the data related to the number of

first-time asylum applicants, which represents the people who lodged an application for asylum for the first time in a given Member State and never applied for international

protection in the reporting country in the past ("Glossary, 2022"). These data for both countries for the ten-year period from 2012 to 2021 is presented in **Figure 1.** below.

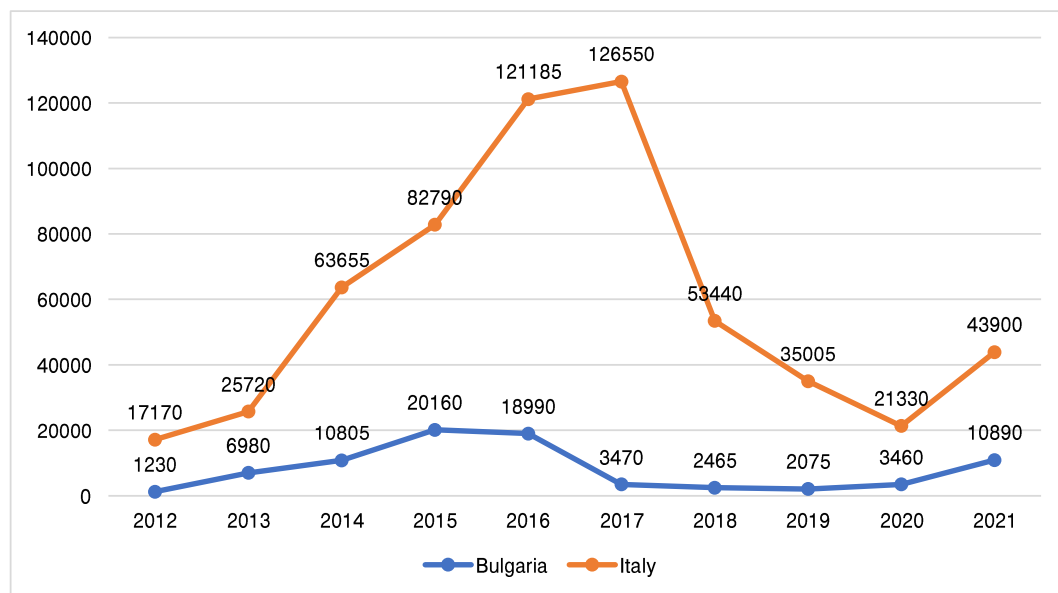


Figure 1. Number of first-time asylum applicants in Bulgaria and Italy from 2012 to 2021

Source: Eurostat

Despite the fact that the number of the applications in Bulgaria is much smaller than that in Italy, it should be stressed that the chart shows a relatively similar tendency. For the period from 2012 to 2015-2016 a huge rise in both countries could be observed. On the other hand, in the following few years, it can be stated that the number is gradually declining. The bottom of this indicator was reached in early 2020, probably due to the COVID-19 restrictions for international travel, adopted by many governments then in order to stop the spread of the disease. What is interesting, however, is the fact that in 2020-2021, the number of people seeking protection in both countries is much higher than that of the previous couple of years. A probable reason is the extraordinary situation in Afghanistan,

which was mentioned above. What is more, the unexpected Russian invasion at the end of February 2022 hides the possibility for an unprecedented crisis, when it is combined with the flows from Afghanistan.

Another thing worth mentioning is the nationality of the arrivals in both countries for the same period. In fact most of the applicants for international protection in Bulgaria in 2021 came from Afghanistan, Syria, Iraq, Morocco, and Pakistan ("Actual Information, State Agency for Refugees," 2022). Oppositely, in Italy, the highest is the number of the arrivals from Tunisia, Egypt, Bangladesh, Iran, and the Ivory Coast (e.g. Varrella at al., 2021).

Another indicator that is worth reviewing is the age of the asylum-seekers in both

countries. These data are shown in the following two charts below.

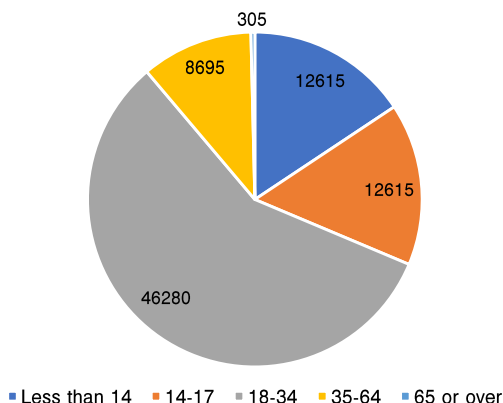


Figure 2. Number of first-time asylum applicants in Bulgaria by age groups from 2012 to 2021

Source: Eurostat

Once the data for Bulgaria was presented, the same indicator for Italy is depicted in **Figure 3.** as follows:

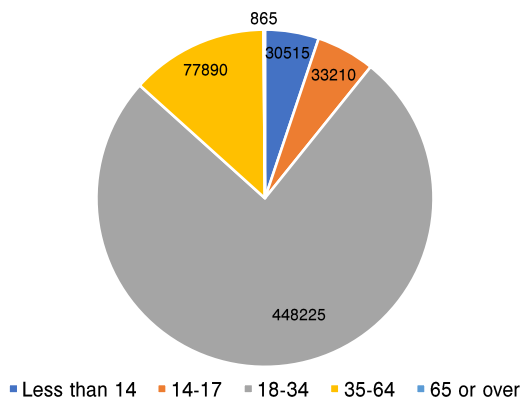


Figure 3. Number of first-time asylum applicants in Italy by age groups from 2012 to 2021

Source: Eurostat

In general, the trends observed in **Figure 2** and **Figure 3** above are quite similar. What is clearly visible is that the number of the asylum applicants between the age of 18 and 34 is far larger than the other age groups included.

What is alarming is the fact that the number of the children under the age of 14 in Bulgaria is significant. It is the second largest group, in contrast to Italy where the people between 35 and 64 are in the second place.

It is interesting to have a look at the gender of the asylum-seekers in both countries. According to Eurostat, the total number of the women from 2012 to 2020 in Bulgaria is 15 760, and 91 460 in Italy. On the other hand, the number of men for the same period is respectively 55 560 for Bulgaria, and 483 125 for Italy.

Another essential element when working on such a topic is the accommodation capacity of the countries that are included in the analysis. In Italy, for example, most of the camps are in its Southern part, because, as it was mentioned above, the Mediterranean Sea is a key gate for migrants coming from Asia and Africa. Nevertheless, as it is mentioned in the official website of the Asylum Information Database (AIDA), which is managed by the European Council on Refugees and Exiles (ECRE), as of June 2021 there are no available comprehensive statistics on the capacity and occupancy of the entire reception system, given the different types of accommodation facilities existing in Italy ("Types of accommodation," 2021).

The contemporary Italian refugee and asylum-seeker system is based on three important decrees – Minniti-Orland (2017), Salvini (2018), and Lamorgese (2020). It is structured at two levels: a/ "Hotspots" and Centers for first reception, and b/ the so-called System for Reception and Integration. For instance, foreign citizens who have entered Italy illegally are housed in centers where they can seek international protection. Such places are defined as "Hotspots" by art. 10 of the Legislative Decree no. 286/98. These

Hotspots are usually located close to a landing place in which, in the shortest time possible, the arrivals can undergo medical examination, receive first assistance and information on immigration and asylum legislation. Examples of currently active hotspots are these at Lampedusa (AG), Pozzallo (RG), Messina, and Taranto. Once the procedures have been completed, the migrants who have expressed desire to seek asylum in Italy are transferred to the first-level reception facilities, which are located at Bari, Toasts, Capo Rizzuto Island (KR), Gradisca d'Isonzo (GO), Udine, Manfredonia (FG), Caltanissetta, Messina. In contrast, foreigners arriving illegally in Italy who do not apply for international protection or do not meet the requirements are detained in the Retention Centers for Repatriation. Such centers exist in Bari, Toasts, Caltanissetta, Gradisca d' Isonzo (GO), Macomer (NU), Palazzo San Gervasio (PZ), Rome, Turin, Trapani. Last but not least, it has to be noted that, currently, the structures of such type that are active in Italy are more than 5 000, with a capacity of more than 80 000 seats ("Centri per l'immigrazione," 2020).

With regard to the present research, Campo Nomadi Muratella was visited in February 2022, which is located on the outskirts of Rome. According to the information on the Internet, it is a refugee camp but the data on it are quite limited. The visit showed that a predominant part of the people living there are representatives of minorities, coming from ex-Yugoslav republics, such as Bosnia and Herzegovina and Montenegro. Precisely because this group is not comparable with the refugees and asylum-seekers in Bulgaria, the results of that field trip are not included in this paper.

On the contrary, in Bulgaria, the state capacity is much smaller than the number of

people seeking protection. In fact there are five Registration Reception Camps for refugees of which three are in the capital city – Sofia, respectively in the neighborhoods Ovcha kupel, Voenna Rampa, and Vrazhdebna. The rest of them are in the village of Banya and the town of Harmanli. The last one is the biggest in the country and it is located around 40 kilometers away from the Bulgarian-Turkish border. The centers of this type are engaged in activities such as registration and accommodation of foreigners who have applied for international protection, medical examination and psychological assistance, and certification of documents. In addition, it should be noted that there is one Transit center in the village of Pastrogor, which is a territorial division of the State Agency for Refugees with the Council of Ministers (SAR) that helps the work of the country with registration, accommodation, and medical examination ("Organizational chart | State Agency for Refugees," 2022). The overall capacity of the institutions mentioned above is around 5 160 of which only 1 032 have been occupied, as of December 2020 ("Conditions in reception facilities," 2022)

In conclusion, it should be mentioned that, as of 1 January 2020, the number of the citizens of a non-EU countries living in Bulgaria is around 94,4 thousand people, which represents 1,4 % of the population, and 3 564,2 thousand in Italy, which is 6 % of the population there ("Non-national population by group of citizenship," 2020). In addition, it is worth bearing in mind that all the information that has been shared in this part of the article is just a brief representation of the situation in Bulgaria and Italy related to the asylum-seekers, and more precisely their number, nationality, age, sex, as well the capacity of both states to accommodate the flows.

However, such an issue needs a great deal of resources in order to function properly. The next section is devoted to clarifying this.

Resource dimensions

Large immigration flows of third-country nationals often cause tension and dissatisfaction among the local population in EU countries due to high costs associated with the stay of the newcomers, as well as their integration. In fact, these grievances are not entirely unfounded because the stay of a refugee or a person granted international protection in a country involves many costs, such as accommodation, food, and medical care. All that money could be spent in other directions like infrastructural improvement or innovations in education, for example.

However, calculating the exact amount needed for this purpose is a difficult task, simply because the cost of living, which represents the amount of money needed to cover basic expenses such as housing, food, and healthcare, in a certain place and time period varies from one EU country to another. In addition, except these basic needs, the process of integration involves further costs such as participation of the newcomers in language courses, work with professionals for overcoming emotional and mental trauma that refugees and asylum seekers are expected to have.

Nevertheless, according to a paper, published by the Organization for Economic Co-operation and Development (OECD), the cost for processing and accommodating an asylum-seeker is around €10 000 for the first year but could be significantly higher if integration support is provided during the asylum phase ("Who bears the cost of integrating refugees? Migration Policy Debates and Data Briefs - OECD," 2017). It is important to note that, nowadays, this amount is likely to be higher due to inflation.

This high cost cannot be borne entirely on a national basis, which is why the EU is intervening through various funds or aids. At the EU level, a main tool for funding such issues is the Asylum, Migration, and Integration Fund (AMIF). Its 2014-2020 budget, according to the European Commission, is €3.137 billion ("Asylum, Migration and Integration fund (2014-2020)," 2014). The fund is part of the so-called Heading 3 of EU funding programs, and then it was placed in the part related to Security and Citizenship. It is focused on people flows and the integrated management of migration by supporting legal migration, integration and returning irregularly staying non-EU nationals ("Heading 3, Security and Citizenship", 2014). Nevertheless, when comparing Bulgaria and Italy, it is interesting to have a look at the share of both countries, which is presented in **Table 1** below.

Table 1. Distribution of AMIF 2014-2020 budget per country

Country	Share of the AMIF 2014-2020 budget per country in million euros	Percentage share of AMIF 2014-2020 budget per country	Percentage share of first-time asylum-seekers compared to their total number in the EU between 2014-2020	Allocator at the national level
Bulgaria	66.6	2,12%	1,19%	Ministry of Interior of the Republic of Bulgaria
Italy	394	12,56%	9,79%	Department for Civil Liberties and Immigration of the Ministry of the Interior of Italy

Source: European Commission and Eurostat

The first thing that should be stressed here is that the percentage of asylum-seekers per country compared to their number at the EU level, on the one hand, and the percentage of the financial share of a country to the total budget of AMIF, on the other, for the period between 2014-2020 is nearly similar, which is a sign of a good distribution of funds at the European level. Another similarity between the two countries is that at the national level, equivalent structures are responsible for the distribution of AMIF, which is also a sign that the EU countries standardize their work processes.

However, the AMIF budget turned out to be extremely insufficient because of the unexpected 2014-2016 migration crisis in the EU. The then emergency prompted the Member States' authorities to find a rapid solution, as the initial policy of open borders and unrestricted admission of immigrants, promoted mainly by Germany, did not work well, or at least not as expected. This was the beginning of a negotiation process between the EU and Turkey, which ended with a decision, taken by the negotiation process between the EU and Turkey, which ended with a decision, taken by the European Council on March 18, 2016, for a bilateral agreement. Some of the action points that both sides agreed on then were aimed at the restriction of irregular migration by returning irregular migrants crossing from Turkey into the Greek islands, taking measures to prevent new sea or land routes for illegal migration from Turkey to the EU, or cooperating with neighboring states. ("EU-Turkey statement, 2016,").

Logically, this "helping hand" was not for free. Another €6 billion from the EU budget has been spent on Facility for Refugees in Turkey. It is worth stressing that the Facility combines

€3 billion of the EU budget and €3 billion of the EU Member States contributions. A first tranche of €3 billion was mobilized in 2016-2017 and a second one in 2018-2019. What is more, given the continued need for support to refugees in Turkey, the EU announced in July 2020 an additional €485 million ("EU signs contracts of the Facility for Refugees in Turkey," 2020). Nevertheless, the EU's generosity seems to have had a stimulating effect on the country, as the number of refugees in Turkey has been steadily rising since then. According to UNHCR, Turkey is the country that hosts the largest number of refugees, which increases from 1.7 million in 2014 to around 4 million in 2021.

On the other hand, the current AMIF (2021-2027) budget is even bigger - €9.9 billion. Among the objectives that are set to be achieved during this period are strengthening and developing a common European asylum system, supporting legal migration and integration of third-country nationals, countering irregular migration and ensuring effectiveness of return and readmission in third countries, enhancing solidarity and responsibility ("Asylum, Migration and Integration Fund (2021-2027)," 2021). According to the same source, beneficiaries of the Fund can be state and federal authorities, local public bodies, non-governmental organizations, humanitarian organizations, private and public law companies, education, and research organizations.

It should be noted that the budget of both countries for the period mentioned above was not available at the moment of writing. A probable reason about that is the fact that the EU is facing other, more urgent crises right now, such as COVID-19 and an unprecedented health situation, tensions between NATO and

Russia and the recently started Russian invasion in Ukraine, which directly affects all EU Member States, bringing instability. Due to the relatively higher budget in the new period, it can be concluded that the financial support for both countries would probably be similar or even bigger.

Another EU fund with a straight relation to migration, asylum-seekers, refugees, and their management is the Integrated Border Management Fund (IBMF), which consists of two components: the Border Management and Visa Instrument (BMVI), and the Customs Control Equipment Instrument (CCEI). IBMF is set up for the period 2021-2027 with a total of €7.37 billion, most of which is reserved for BMVI - €6.38 billion for the same period. Among the actions under BMVI are: improving border control, investing in IT systems, infrastructure, equipment, systems and services, training, and innovative solutions ("Integrated Border Management Fund – Border Management and Visa Instrument (2021-27)", 2021). What is worth stressing again is the fact that there are no data available for the Bulgarian and Italian shares so far. Despite the fact that other crises exist, this topic should not be belittled.

Regarding the Russian invasion of Ukraine and the subsequent waves of refugees to Europe after February 24, 2022, the European Commission decided to distribute €3.5 billion to Member States in order to help them manage the arrival of people fleeing the war on their territory, of which €148 million is intended for Bulgaria and €452 million for Italy ("Ukraine," 2022). However, the countries' attitude towards Ukrainian refugees is far better than that towards Afghans or Syrians, for example, which hides

potential risks for future internal conflicts. In Bulgaria, for instance, most of the people coming from Ukraine were accommodated in hotels ("Nearly 60,000 Ukrainian refugees are staying in Bulgarian hotels," 2022), many of which located in sea resorts in which the living conditions are incomparable with those in the refugee reception centers. That division and privilege for some might trigger hatred among immigrants and such practices must be eliminated.

There are other funds, which are not directly but indirectly connected with the topic, such as the European Social Fund, Erasmus+, Fund for European Aid to the most Deprived, just to name a few. However, the scope of this article covers only the main funding opportunities and economic dimensions of the issue. This refers to the next essential part - the regulatory aspects.

Regulation framework overview

Another essential part of the equation is the package of regulations and laws that Italy and Bulgaria issued and adopted in the field of refugees and asylum-seekers. It should be mentioned that the role of the legislation is probably the most important one as it dictates the way in which the state is dealing with the issue. What is worth indicating here is the year of ratification of the 1951 Refugee Convention and its 1967 Protocol in both countries, documents, which are fundamental to almost all national legislations. In fact, Italy's ratification was far earlier than that of Bulgaria. According to a list of State Parties of UNHCR, Italy became part of the Convention on 15 November 1954, and the Protocol on 26 January 1972. On the other hand, for Bulgaria, the date is 12 May 1993 for both. It

is good to note that a probable reason for the late adaptation of Bulgaria to the world norm is precisely its “eastern” orientation, being a Soviet ally until 1989, rather than towards the so-called “western”, democratic, and liberal world.

In Bulgaria, the institution that is responsible for that function is the Parliament of the Republic of Bulgaria or also known as the National Assembly. It has three basic functions - to legislate, to exercise parliamentary control, and a constitutive function. The legislative function is usually performed by adopting, amending, and rescinding laws. The control function of the National Assembly is to supervise the executive. Its constitutive function is to elect the members of the Council of Ministers, as well as the heads of other institutions established by a law. (How does the National Assembly work, n.d.)

A key event that turned the Bulgarian legislation upside down is the country's application for EU-membership that started in 1995 and its acceptance twelve years later. During that period, Bulgaria had to harmonize its national laws with those of the Union, a requirement, which was mandatory. As a full EU member since 2007, Bulgaria has become part of the Common European Asylum System, which is a key tool for the management of migration processes in the EU. Other documents at the European level that influenced Bulgarian legislation are the Lisbon Treaty, and the European Pact on Immigration and Asylum.

The supreme law of the Republic of Bulgaria is the Constitution. Even in it, issues related to asylum-seekers are addressed. For example, in Art. 27 it is mentioned that foreigners residing legally in the country shall not be expelled or

extradited to another state against their will, except in accordance with the provisions and the procedures established by law. The article adds that the Republic of Bulgaria must grant asylum to foreigners persecuted for their opinions or activity in the defence of internationally recognized rights and freedoms. Moreover, in Art. 27 it is mentioned that the conditions and mechanism for granting such status should be established by law. (CONSTITUTION OF THE REPUBLIC OF BULGARIA, 1991).

In the case of Bulgaria, this law is the Asylum and Refugees Act (ARA) (Asylum and Refugees Act, 2002), which has been in force since 2002. According to Art. 1 of ARA, the protection that the Republic of Bulgaria shall provide to foreigners includes asylum, international protection, and temporary protection. The types of protection are described in Art. 1a. For example, international protection includes refugee status and humanitarian status and shall be granted under the 1951 Geneva Convention, and the 1967 Protocol, as well as the International Human Rights laws. On the other hand, temporary protection is granted in cases of a mass influx of aliens who are forced to leave their country of origin due to military conflict, civil war, foreign aggression, or violation of human rights on the territory of the relevant country or in a part of it, and who for these reasons cannot return there. Usually, the period of this protection is determined by a resolution of the Council of the EU.

However, it should be noted that the immigrants for which it was mentioned above must comply with all laws and regulations of the country, because Art. 5 of ARA unequivocally mentions that aliens who are

seeking or have been granted protection in the Republic of Bulgaria have similar rights and obligations, and bear civil, administrative penal and criminal liability under the terms and procedures applicable to Bulgarian nationals.

Another crucial thing that both the Constitution and ARA include is the role of the authorities in the work with refugees and asylum-seekers. For example, the President of the Republic of Bulgaria shall grant asylum within his/her powers in the cases under Art. 27, paragraph 2 of the Constitution, as well as when the state interests or exceptional circumstances require so. In addition to granting asylum, the President of the Republic of Bulgaria may revoke it when he considers that the circumstances for its provision have changed or no longer exist, according to Art. 18 of ARA. The Council of Ministers is another institution that should grant temporary protection under Art. 1a, paragraph 3, as introduced under a resolution of the Council of the European Union. Last but not least, the Chairperson of the State Agency for Refugees may also grant international protection.

If it comes to the Italian legislation, it should be noted that it is quite similar to this in Bulgaria. However, the main difference between the Italian legislative body – the Parliament, and the Bulgarian one, is that the Italian is bicameral, it is composed of the Chamber of Deputies and Senate of the Republic, according to Art. 55 of the Italian constitution (The Constitution of the Italian Republic, 1947). However, exactly as it is in Bulgaria, the main prerogative of the Italian Parliament is to enact laws.

Another similarity is that the Constitution is the supreme law of both states. Nonetheless, if the parts of them, which are related to

asylum-seekers, foreigners and refugees are compared, it would be clear that both documents contain quite similar texts, which should not be a surprise, as both countries are EU members, and their laws are in line with the framework set by the Union. For example, special attention to the issues related to this topic is paid in Art. 10, entitled International Law, where it is written that “foreigners to whom the actual exercise of the democratic freedoms guaranteed by the Italian Constitution is denied in their own country, shall be entitled to the right of asylum within the territory of the Republic, under conditions laid down by law and their extradition for political offences shall not be permitted”. Art. 10 adds that Italy’s legal system shall conform with the generally recognized principles of international law and the legal status of foreigners shall be regulated by law in conformity with international rules and treaties.

The development of the migrants and refugees-related legislation in Italy follows the migration trends in the country. Italy was an emigration country till the 1970s. At the end of the 19th and at the beginning of the 20th century many Italians settled in North America (during the so-called “Great Emigration”) and North Africa. Since the beginning of the 1980s, trends have changed and the country became an attractive destination for citizens from other countries, initially non-European ones, who had the intention of settling permanently there. The first immigrants were students and political dissidents escaping from dictatorship and persecution in Africa, the Middle East, Latin America, and Asia. Economic immigration flows became significant in the early 1980s (e.g. Zincone and Caponio, at al. 2005). All this provoked the Italian government

to undertake adequate measures, including the adoption of appropriate legislation.

The beginning of the legislative initiatives in the immigration sphere was set in the mid-1980s. Law No. 943 of 1986 “Regulations concerning the Placement and Treatment of Immigrant Extra-Community Workers and Against Clandestine Immigration” was the first adopted law dedicated to migration issues in general. The Law aimed to regulate the civil and social status of foreign workers, legal residents in the country and to protect the local work force. In addition, it provides for penalties for those who hire extra-community workers under illicit conditions.

In the 1990s, in parallel with the migration flows from Eastern-European countries after the end of the Cold war and in conditions of a growing number of illegal residents, the Italian migration legislation was enhanced. In this period two new laws were adopted – Law No. 39 of 1990 “Urgent rules on political asylum, entry and residence of non-EU citizens and the regularization of non-EU and stateless citizens already present in the territory of the State. Provisions on asylum.” (so-called the Martelli Law), which was based on Decree-Law No. 416 of 1989 and Law No. 40 of 1998 “Discipline of immigration and rules on the condition of the foreigner.” (so-called the Turco-Napolitano Law). The Martelli Law abolished the geographical restrictions to the 1951 Geneva Convention, a passage that limited the recognition of status to refugees from Europe. It contained norms that only

partially regulated asylum issues. The Turco-Napolitano Law replaced the Martelli Law with numerous changes in terms of immigration rules in Italy but did not make substantial changes to asylum-related issues. The Turco-Napolitano Law was followed by adoption of Decree-Law no. 286/1998 “Consolidated Act on provisions concerning immigration regulations and rules on the condition of the foreigner”. Italy revised its immigration legislation in 2002 when Law No. 189 (the so-called Bossi-Fini Law) was adopted. Each subsequent law was based on the previous one, supplementing it in various aspects.

The Italian legislation about refugees and asylum-seekers issues was brought in line with the EU norms in this sphere. For example, COUNCIL DIRECTIVE 2003/9/EC of 27 January 2003 laying down minimum standards for the reception of asylum-seekers, COUNCIL DIRECTIVE 2004/83/EC of 29 April 2004 setting minimum standards for the qualification and status of third country nationals or stateless persons as refugees or people who need international protection, as well as the content of the protection granted, and COUNCIL DIRECTIVE 2005/85/EC of 1 December 2005, which is related to minimum standards on procedures in Member States for granting and withdrawing refugee status.

For further clarity, an overview of the regulatory framework is presented in **Table 2**, reflecting the regulations adopted since the 1990s in both countries.

Table 2. Key legislative acts related to asylum-seekers adopted in Bulgaria and Italy since the 1990s

	Bulgaria	Italy
Title	The Constitution of the Republic of Bulgaria, e.g., Art. 27	The Constitution of the Italian Republic, e.g., Art. 10
	Decree No. 208 / 4 October 1994 for Granting and Regulating the Status of Refugees, adopted by the Council of Ministers	Law No. 39 of 1990 "Urgent rules on political asylum, entry and residence of non-EU citizens and the regularization of non-EU and stateless citizens already present on the territory of the State. Provisions on asylum." (the so-called the Martelli Law)
	Law on Refugees, 1999	Law No. 40 of 1998 "Discipline of immigration and rules on the condition of the foreigner." (the so-called the Turco-Napolitano Law)
	Law on Aliens in the Republic of Bulgaria, 1999	Decree-Law no. 286/1998 "Consolidated Act on provisions concerning immigration regulations and rules on the condition of the foreigner"
	Asylum and Refugees Act, also known as the Law on Asylum and Refugees, 2002	Law No. 189/2002 (the so-called Bossi-Fini Law)
	Some Ordinances, for example Ordinance № I-13 of 29 January 2004 related to the aliens' temporary accommodation, Ordinance № 332 of 28 December 2008, and Ordinance № 208 of 12 August 2016	Some Directives and Laws, adopting the Italian regulatory framework to the EU norms, e.g., Directive 2003/9/EC, Directive 2004/83/EC, Directive 2005/85/EC, Legislative Decree no. 251/2007, related to the implementation of Directive 2004/83/EC, Legislative Decree no. 25/2008, related to the implementation of Directive 2005/85/EC, Law no. 238 /2021

What becomes clear from the text and data in the table above is the fact that the legislative approach of the two countries differs significantly. In Bulgaria, for example, the ARA of 2002 is still in force, and changes and adaptations to European legislation are carried out in the form of changes and updates to the Law itself. In Italy, on the other hand, this takes the form of the adoption of new decrees and acts.

What is interesting to note, however, is that the legal framework of Italy does not have a special law, intended for refugees and asylum-seekers, but numerous decrees and regulations. ("Overview of the legal framework," 2022). However, an example of a good practice is the initiative of the Ministry of Interior of Italy, which implemented a Practical Guide for Asylum Seekers in Italy. The document contains information connected with frequently asked questions, such as what

international protection is, where and how to apply for it, what are the duties and rights of the asylum-seekers in Italy, or reception conditions issues. All of these issues are described as simply as possible, in order to be easy to understand ("PRACTICAL GUIDE FOR ASYLUM SEEKERS IN ITALY," 2019). Despite the fact that the regulation in Bulgaria looks better suited at first sight, the implementation of a similar guide could be very useful, both for authorities and aliens.

In order to summarize all the things mentioned in this part of the article, it should be noted that the documents listed above cover the legal framework of both countries very briefly. However, it could be pointed out that the observation of such a topic is a subject of a whole new research and that is why this paper focuses only on a superficial overview.

Conclusion remarks and recommendations

The lack of security that the world faces nowadays due to numerous harming events such as the COVID-19 pandemic, conflicts as this in Ukraine, global warming and related natural disasters, or shortage of basic provisions are a perfect stimulus for an increase in migration rates. The data included in this article prove that the EU and more precisely both countries studied are not an exception, but exactly the opposite – Italy has more than 480,000 and Bulgaria around 80,000 asylum applicants only for the ten-year period between 2012 and 2021, which makes them one of the most affected countries in the EU.

However, the study shows many omissions in the social, economic, and legal aspects of the issue, both in Bulgaria and Italy. Legislators, busy with legislative amendments, often leave their implementation more on paper than in practice. More often than not, the mass media and the non-governmental sector show much more initiative through a wide spectrum of activities such as rising public awareness and giving asylum-seekers a helping hand. However, that is the state authorities' obligation, and that should not be the case.

In addition, the literature review shows that the scientific society does not pay the necessary attention, especially when it comes to Bulgaria. The country is often excluded, or at least rarely mentioned in comparative studies, probably because of the relatively smaller number of people who seek international protection in the country. However, Bulgaria as an EU external border is located on one of the main routes for refugees to Europe and as a country bordering Turkey, it should be in the

focus of the scholars because of its strategic geographic position.

What is more, the economic dimensions clearly show that huge sums were spent but the results are not satisfactory as the access to social services such as education, labor market, and healthcare, is still limited in both states ("Access to education," 2022) ("Access to the labour market," 2022) ("Healthcare," 2022) ("Access to education for refugee and migrant children in Europe", 2019). What is more, in the second half of the 2010s the EU granted Turkey billions of euros in order to keep migrants on its territory, however, there are many cases in which Turkey used this as an advantage. In our viewpoint, a far better decision would be the investment in more sophisticated border policing, a stronger Frontex, an active fight against smuggling schemes, education, and healthcare initiatives. The counteraction of irregular migration, in addition, would reduce the chances of asylum-seekers getting into risky situations, which in some cases lead to a fatal outcome. On the other hand, the reduction of the latter would affect the so-called smugglers, as some of them may use the money earned in other criminal activities, which in turn would probably lower the crime rate.

Given the conclusions drawn, the following recommendations could be formulated:

- The relatively low interest of scholars in conducting such comparative studies shows that additional incentives for their motivation are needed.
- Given the favorable fact that most asylum-seekers registered in Bulgaria and Italy between 2012 and 2021 are in their working age, additional efforts are needed to integrate them into the working and economic life. This applies particularly

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strongly to Bulgaria, regarding the deepening demographic crisis in the country.

- The accommodation capacity of both countries must be increased as the number of asylum-seekers is significantly higher than the seats available. That requires some of them to be accommodated in other state bases or even private hotels, as in the case of Ukrainian refugees, which creates a certain inequality between different nationalities and might trigger internal conflicts.
- A prioritization of the problem related to refugees and asylum-seekers is needed and accordingly allocation of more funds, as well as better monitoring and transparency of their spending at the national level, as in most cases, the financial support is insufficient.
- The EU legislation should be standardized and unified, which in Bulgaria and Italy is not the case. Good legal practices such as the Practical Guide for Asylum-Seekers in Italy should be adopted.

In conclusion it should be stressed that joint efforts, international cooperation of institutions, authorities, non-governmental organizations, private sector, and academic society, transparency and systematic and constant monitoring of funds spending, application of the rule of law are among the mandatory steps to the successful solution of this sophisticated problem.

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