

FAiR Working Paper

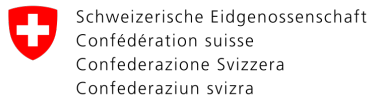
Extra-European return diplomacy: A conceptual and empirical investigation

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
INTRODUCTION.....	2
THEORETICAL BUILDING BLOCKS: LITERATURE ON REFUGEE EXTERNALIZATION, MIGRATION DIPLOMACY AND GOVERNANCE.....	4
AN ANALYTICAL FRAMEWORK FOR RETURN DIPLOMACY.....	6
Basic dimensions: Regulatory and organizational properties	6
The regulatory perspective: Typology of Intergovernmental Return Frameworks.....	8
The organizational perspective: Communicative approaches to return diplomacy	10
TRENDS AND PATTERNS IN EXTRA-EUROPEAN RETURN DIPLOMACY.....	12
Temporal patterns of extra-European return diplomacy.....	12
Spatial patterns of extra-European return diplomacy	14
REGULATORY PROPERTIES OF EXTRA-EUROPEAN RETURN DIPLOMACY	15
From formal to informal return frameworks	16
State preferences in linked policy fields	17
CASE STUDIES I: INTRA-GOVERNMENTAL COORDINATION IN RETURN DIPLOMACY	20
Italy: A flexible yet centralized cooperation structure.....	20
Poland: A sectoral approach with minimal horizontal coordination	21
Germany: A restrained whole-of-government approach.....	21
Switzerland: The shift towards a whole-of-government approach.....	22
Georgia: Fragmented responsibilities in return governance	23
Nigeria: Structured coordination, low political priority	23
CASE STUDIES II: INTER-GOVERNMENTAL COOPERATION IN RETURN DIPLOMACY	24
The Readmission Agreement between the EU and Georgia of 2010.....	24
The Implementation Protocol between Poland and Ukraine of 2017	26
A decade of EU-Nigeria negotiations over a Readmission Agreement	27
The Migration Partnership between Switzerland and Nigeria of 2011.....	29
CASE STUDY INSIGHTS AND DISCUSSION	30
CONCLUSIONS.....	33
REFERENCES.....	35
ANNEX	39
Overview expert interviews	39

EXTRA-EUROPEAN RETURN DIPLOMACY: A CONCEPTUAL AND EMPIRICAL INVESTIGATION

EXECUTIVE SUMMARY

This working paper offers a conceptual and empirical investigation of Intergovernmental Return Frameworks (IRFs) as a central instrument of *extra-European return diplomacy*. This refers to the strategic use of diplomatic actions and internal coordination by European states or the EU aimed at governing the return and readmission of people without valid residence permits to countries outside Europe. Drawing on original case studies, systematic inventories, and theoretical literature, this paper advances a novel analytical framework that distinguishes between the regulatory and organizational properties of return diplomacy.

With regard to the regulatory properties, we develop a typology that classifies IRFs according to their legal bindingness and policy scope, distinguishing four ideal types: *Readmission Arrangements*, *Readmission Agreements*, *Composite Arrangements*, and *Composite Agreements*. This typology draws from and specifies categories of practice while moving beyond existing dichotomies (e.g., formal/informal or standard/non-standard) from established categories of analysis by capturing the diversity and complexity of IRF instruments in practice.

Regarding the organizational properties, we conceptualize return diplomacy as shaped not only by inter-governmental dynamics but also by the intra-governmental structures and coordination within the participating states. We identify four ideal typical communicative approaches to return diplomacy—*Conditional Sectoral*, *Consensual Sectoral*, *Conditional Whole-of-Government*, and *Consensual Whole-of-Government Approach*—which capture variation in both intra-governmental coordination and negotiation style.

In the empirical part, we first map the regulatory properties of extra-European return diplomacy, drawing from the novel FAiR inventory of IRFs as well as existing data collections. By comparing European states, we identify a stark variation in the number of extra-European IRFs concluded. Generally, we can observe that return diplomacy by European states has become global in reach, spanning almost all world regions.

The working paper then zooms into the organizational properties of return diplomacy based on expert interviews in six FAiR focus countries: Germany, Italy, Poland, Switzerland, as well as Georgia and Nigeria. Thereby, we find substantial variation regarding the intra-governmental cooperation structure, varying from a sectoral approach with minimal horizontal coordination in Poland to a fully established whole-of-government approach in Switzerland.

Finally, we examine the inter-governmental coordination between the EU or EU+ states and non-EU+ states. Case studies cover four country pairs, each representing one of the four communicative approaches to return diplomacy: EU-Georgia, Poland-Ukraine, EU-Nigeria, and Switzerland-Nigeria. Our findings suggest that intra-governmental governance structures significantly shape inter-governmental negotiation outcomes. Ultimately, effective return diplomacy depends on the quality of the relationship between the negotiation partners.

Introduction

The ambition to increase the return of people without valid residence permits has spread widely across European governments. In response, we have witnessed an ever-denser network of Intergovernmental Return Frameworks (IRFs) through which European states seek to enforce the return of illegalized migrants. In the 1990s, European states concentrated on concluding agreements that narrowly focus on return and readmission with other European states. Particularly since the 2000s, we can observe a shift towards broader arrangements that span multiple policy fields with non-European states (Cassarino, n.d.). A case in point is the ‘Migration Partnership’ between Germany and Kenya of September 2024, which regulates readmission and return to Kenya, as well as legal pathways and labour opportunities in Germany (Bundesministerium des Innern, n.d.). These efforts at the national level have been complemented by the evolution of overlapping frameworks at the EU level, through which the EU has sought to institutionalize the norm to return and readmit (Lavenex & Rausis, forthcoming; Stutz, 2024).

Yet, in some cases, aspirations and bargaining do not transpose into legal frameworks. For example, the negotiations between the European Commission and the Nigerian government over an EU Readmission Agreement (EURA), which formally began in March 2016 (European Union, 2016), have still not been concluded after almost a decade. Overall, however, we can observe a proliferation and a pluralization of IRFs between European and non-European states, reflecting the emergence of what can be called *extra-European return diplomacy*. Focusing on the international cooperation on return and readmission between EU+ states or the EU with non-EU+ states, this working paper tackles the following questions: How can we conceptualize and categorize the different types of IRFs and approaches to return diplomacy that have emerged over the past few decades? Which trends and patterns in the evolution of IRFs between EU+ and non-EU+ states can we observe? What are the underlying conditions and negotiation dynamics shaping return diplomacy between EU+ states or the EU with non-EU+ states?

The concept of *return diplomacy* builds on a sub-category of what has been dubbed *migration diplomacy*, describing ‘the use of diplomatic tools, processes, and procedures to manage cross-border population management’ (Adamson & Tsourapas, 2019, pp. 116-117). Return diplomacy is a relatively novel concept that has recently been defined as ‘the strategic use of negotiations, bargaining between and a mix of diplomatic instruments to govern the return of migrants, particularly those considered irregular or unauthorized’ (Sahin-Mencutek et al., 2025, p. 3). In this working paper, we draw from these established concepts yet widen the analytical lens, suggesting that Extra-European return diplomacy refers to the strategic use of diplomatic actions and internal coordination by European states or the EU aimed at governing the return and readmission of people without valid residence permits to countries outside Europe.

This definition recognizes that return diplomacy cannot be reduced to negotiation and bargaining processes *between* negotiation partners. Instead, it also includes the strategic decisions that aim to influence negotiation dynamics or legal frameworks by organizing *intra*-governmental cooperation structures in a particular way. For example, moving from an isolated and sectoral governmental structure towards a whole-of-government approach can be a strategic decision to widen the policy areas in negotiation. In addition, the case studies presented in this working paper deviate from current research on migration diplomacy regarding the assumptions of the determinants of return diplomacy. While the current literature on migration and return diplomacy predominantly looks at states as

rational and strategic actors focused on national interest (but see e.g., Paasche et al., forthcoming), the case studies are informed by the insight that such negotiations are also shaped by perceptions of appropriateness. In doing so, these complement the realist perspective on migration diplomacy with social constructivist theorizing such as the literature on norm emergence (Finnemore & Sikkink, 1998) and norm contestation (Wiener, 2014).

This working paper presents both a conceptual and empirical investigation into extra-European return diplomacy. In the first part, a conceptual framework that distinguishes between the regulatory and the organizational properties of IRF governance—or, put simply, return diplomacy—is developed. While the regulatory properties set the legal institutional framework, the organizational properties frame the communicative space for participating actors. Based on this broad categorization, a typology is presented that allows us to systematize and assess the different types of IRFs that have emerged over the past few decades. The regulatory properties of IRF have two dimensions: the legal obligations and the policy scope. In other words, IRFs are classified based on whether they are legally binding or non-binding, as well as whether they include explicit issue-linkages or focus narrowly on readmission and return.

The organizational properties of IRF capture the communicative structures within which return diplomacy unfolds. It places approaches between more sectoral and isolated government structures or more integrated structures that follow a whole-of-government model regarding the dimension of intra-governmental coordination, and between more consensual and co-determined or more conditional and pre-determined negotiation styles between states for the dimension of inter-governmental coordination. This separate conceptualization of the regulatory and organizational properties of return diplomacy recognizes that different types of IRFs can be combined with different communicative approaches and negotiation strategies.

In the empirical part, this working paper first takes a broad view, tracing the trends and patterns in the evolution of the extra-European return diplomacy landscape, before zooming into the approaches to return diplomacy in four European states—Germany, Italy, Poland, and Switzerland—as well as two non-European states—Georgia and Nigeria. The comparative case studies related to states' organizational properties—the communicative aspect in return diplomacy—are mainly based on field work and expert interviews carried out by researchers of the FAiR consortium between June 2024 and July 2025.¹ Based on case studies in six countries and a particular focus on the EU-Georgia, Poland-Ukraine, EU-Nigeria, and Switzerland-Nigeria negotiations—each representing one ideal-typical approach in the communicative aspect of return diplomacy—we can gain three main insights. First, the normative convictions of negotiation partners shape return diplomacy as much as the strategic interests of both sides. This is because return diplomacy is deeply embedded in historical boundaries as well as the economic and political ties between partners. Second, the inter-governmental negotiation dynamics between states are heavily affected by the intra-governmental cooperation structures within states. In return, states that aim to change the cooperation dynamics between states must not only strive to change their negotiation style but also reform the organizational structure and communication within state administrations. Third, tentative evidence suggests that the effectiveness

¹ The Appendix provides a full, yet anonymized, list of the experts interviewed, as well as basic information regarding the interviews conducted for this working paper. While expert interviews in all focus countries have been conducted, negotiating access to state representatives who have been directly engaged in return diplomacy has generally proven to be highly challenging, and access granted to FAiR researchers has been handled in a rather restrictive way. While the empirical sections of the working paper foreground the information gained in the expert interviews, this information has been complemented and compared with that provided by official state sources, as well as with academic and grey literature on the cases and countries under investigation.

and perceived legitimacy are not determined by a specific selection of IRF type or communicative approach to return diplomacy. While a Consensual Whole-of-Government Approach appears to be the best path to establish legitimacy for both sides, even a Conditional Sectoral Approach can be perceived as fair—provided that the relationship between both partners has historically been relatively uncontentious and one partner has a strong interest in closer political ties.

This working paper broadens the perspective on extra-European return diplomacy but has several limitations. While it examines both negotiation processes between states and inter-departmental cooperation within states, it does not consider actors beyond states and international organizations. This reflects the reality that even though we have witnessed the emergence of an *European deportation regime*, which involves a large variety of state and non-state actors (Rausis et al., 2024), return diplomacy remains largely state-driven, with minimal involvement from civil society or NGOs. International organizations like UNHCR and IOM may facilitate inter-state dialogue or advise less experienced countries (UNHCR1-6; IOM1-2) but are only occasionally directly involved in negotiations.² Finally, although this paper offers conceptual and empirical insights, it does not systematically assess the factors influencing the success or failure of return diplomacy—topics to be addressed in a forthcoming FAiR working paper.

Theoretical building blocks: Literature on refugee externalization, migration diplomacy and governance

The conceptualization of return diplomacy presented in this working paper is primarily informed by three distinct strands of research: studies on the externalization of asylum, migration diplomacy, and governance theory. Research on refugee externalization policies provides crucial context for understanding the use of intergovernmental return frameworks within the broader landscape of migration policy and migration control. The literature on migration diplomacy, with its focus on cooperation between states, offers valuable insights for theorizing these frameworks as well as the negotiation dynamics. Finally, concepts developed within the governance literature contribute to a nuanced understanding of the various approaches to governance within states. Combining these different strands of research allows to contextualize the proliferation of IRFs over the past decades as well as to better understand how cooperation between and within states influences each other.

The proliferation of international cooperation frameworks on return by European states can be seen in the wider context of the illiberal turn in asylum governance and the rise of *externalization policies*. Refugee externalization policies refer to the process of shifting both refugee protection and migration control outside national territories and the legal responsibility of states (Lavenex, 2022; Refugee Law Initiative, 2022). A wide range of explicit or subtle instruments of control have been employed as part of these externalization policies, which aim to minimize or shift state responsibility in refugee protection. For example, researchers have pointed to the use of fences (Ferrer-Gallardo & Gabrielli, 2024), visa requirements (Czaika et al., 2018), safe country policies (Rausis, 2023), databases (Leese et al., 2022), information campaigns (Cham & Trauner, 2023), or the criminalization of saving migrant lives at sea (Graffin et al., 2025). Thereby, we have witnessed a shift from unilateral policies of non-admission

² However, this is not to say that there are no examples in which international organizations have been substantially involved into extra-European return diplomacy. In some cases, for example in the 2006 tripartite agreement between Switzerland, Afghanistan and UNHCR (Swiss federal authorities, 2006), international organizations are even among the main contractual partners.

to collaborative or delegated policies of non-arrival, and, finally, outsourced policies of non-departure over the past few decades of refugee externalization policies (Lavenex, 2022).

The negotiation of IRF falls into the attempt of externalizing migration control through interventions in the diplomatic space (Rausis & Lavenex, 2024). However, in a narrower view, such frameworks or provisions could be interpreted as solely aimed at regulating the return of illegalized foreign nationals—and they are rarely listed as instruments in the toolbox of refugee externalization policies. Nonetheless, because of their *dual nature* IRFs are not only supposed to regulate the legal details of returning migrants but also to serve as a deterrent. States use IRFs to signal to people seeking protection that they could be sent to their country of origin or a third country. Therefore, IRFs present an example of “cooperative deterrence” (Hathaway & Gammeltoft-Hansen, 2014) and a central pillar in the “architecture of repulsion” (FitzGerald, 2019, p. 6).

Over the past decade, a growing body of literature has emerged using the concept of *migration diplomacy*, exploring how states use diplomatic tools to regulate the movement of people across borders (e.g., Tsourapas, 2017; Norman, 2019; İçduyugu & Üstübcici, 2014). A central focus within this field is *return diplomacy*, which centers the negotiations and bargaining between states aimed at controlling the return and readmission of people without valid residence permit to their country of origin or a third country (e.g., Mencütek et al., 2025; Vera-Larrucea & Luthman, 2024). A key question in this research concerns how power imbalances and diverging regime types between negotiating states influence the initiation and outcomes of IRFs (Stutz & Trauner, 2024). Furthermore, scholars have explored how return and migration policies are interconnected with other policy areas as a result of diplomatic negotiations through the concept of *explicit issue-linkages* (see Koremenos et al., 2001). Theoretical approaches in this area often adopt a rationalist perspective, emphasizing the divergent interests of states and power asymmetries between negotiating parties, drawing on realist theory in international relations (Adamson & Tsourapas, 2019). More recently, researchers have expanded their focus to the *geopolitics of return migration*, which considers the broader international landscape of actors and opportunity structures that shape return negotiations (Fakhoury & Mencütek, 2023).

Scholars have compared international cooperation on migration to a *suasion game*, marked by an asymmetry of interests and power, with strong ‘receiving states’ on one side and weaker ‘sending states’ on the other (Kainz & Betts, 2020). In such scenarios, powerful (often Western) states leverage their dominant position through mechanisms like issue-linkage to persuade or pressure weaker (often non-Western) states into accepting their terms (Betts, 2011).³ In addition to issue-linkage as a strategy for addressing power imbalances, many researchers have highlighted the growing trend toward the informalization of return agreements (Cassarino, 2007; Sahin-Mencütek & Triandafyllidou, 2024). The shift from narrow, legally binding EU Readmission Agreements (since 2004) to broader, non-binding migration partnerships (since 2016) serves as a prime example of this evolution.

The literature on migration and return diplomacy has provided valuable insights into state cooperation; however, the impact of internal state cooperation and its interaction with inter-state collaboration has received comparatively less attention. To distinguish these dynamics, we can draw from two prominent approaches in the governance literature: the whole-of-government approach and the sectoral

³ Challenging this oversimplified view, Cassarino (2007: 192) introduces the concept of *reverse conditionality* in negotiations between the EU (or EU member states) and Maghreb countries over return agreements. This reversal of power dynamics in migration and return negotiations has been further theorized and explored in various contexts (e.g., Tittel-Moser, 2018; Kefale et al., 2025). By strategically using migration flows, non-European states can pursue transactional relationships, turning return agreements into a means of securing concessions in other areas (Tittel-Moser, 2018; Kefale et al., 2025; Tsourapas et al., 2025).

approach (see e.g., Christensen and Lægreid, 2007). The sectoral approach to international cooperation is characterized by dominance by government leaders, with only the formally affected state department playing a central role, but limited inter-departmental coordination. This can result in a narrow scope for cooperation across diverse policy areas. In contrast, the whole-of-government approach emphasizes strong inter-departmental coordination, which can foster broader international cooperation, allowing for negotiation across multiple policy domains. The choice between these approaches not only influences the breadth of policy engagement and the effectiveness of cooperation but also shapes the *input legitimacy* in return diplomacy (Torres et al., 2024)

An analytical framework for return diplomacy

Basic dimensions: Regulatory and organizational properties

From a conceptual perspective on the governance of Intergovernmental Return Frameworks—or, put simply, return diplomacy—we can distinguish between the *regulatory* and the *organizational properties* as basic dimensions (Lavenex, 2004; Lavenex & Krizic, 2022). While the regulatory properties reflect the legal aspect of return diplomacy, the organizational properties describe its communicative aspect.

Research on return diplomacy has hitherto focused mainly on the regulatory properties of cooperation agreements. A frequent distinction is between formal/informal (sometimes referred to as binding/non-binding; standard/non-standard) agreements. This dimension of an arrangement's regulatory properties can be referred to as capturing the existence of *legal obligations* in commitments (Abbot et al., 2000). It thus distinguishes legally binding from legally non-binding frameworks. A second dimension of an arrangement's regulatory properties is the *policy scope*. It captures the narrowness or breadth of legal frameworks. Thereby, a key distinction for IRFs is whether they cover narrowly return and readmission or whether they have a broader scope based on explicit issue-linkages with other policy areas.

To focus on issue-linkage seems particularly relevant for the context of IRFs, as these are viewed to be a central negotiation strategy. It allows powerful states with such leverage to strike an agreement by persuading another state that otherwise has no incentive to cooperate on return and readmission. From a game theoretical perspective, this approach follows the logic of a *suasion game* that has been declared to represent most accurately the asymmetry of power and interests between Global North and South countries on migration (e.g., İçduygu & Üstübcici, 2014; Norman, 2020; Tsourapas, 2017). Thereby, issue-linkages can be seen as a way to overcome the suasion game logic by broadening the field of negotiation and opening other policy fields to negotiations in order to strengthen interests on both sides. While many scholars have pointed to the relevance of issue-linkage in intergovernmental agreements in general (e.g., Haas, 1980; Poast, 2012), migration scholars have foregrounded its relevance in the negotiation and implementation of migration-related agreements (e.g., Lavenex et al., 2023; Leerkes et al., 2022).

There are several ways to distinguish between types of issue linkages in international negotiations. For example, Tollison and Willett (1979) differentiate between *mutually beneficial* and *unilaterally advantageous* linkages, Haas (1980) distinguishes *tactical* from *substantive* issue linkages, and Oye (1993) contrasts *exchange linkages* with *extortion linkages*. In our framework, however, we define issue linkages based on two specific requirements. First, we focus only on *explicit linkages*, which refer

to the inclusion of multiple issue areas within the same written framework (see Koremenos et al., 2001). This focus does not preclude the possibility of implicit linkages, which may arise when separate agreements are negotiated simultaneously or in close temporal proximity and are understood to be connected. However, it sets a clear focus on the legal framework that is negotiated, at least when categorizing return diplomacy based on the regulatory properties. Second, we define issue-linkages as connections that extend a legal framework beyond the narrow policy field of return and readmission. These linkages may thus either involve other areas of migration policy that are not directly tied to readmission or reach into entirely different policy domains, such as trade, development, or security (see Hampshire, 2016; Lavenex & Lahav, 2012).

Organizational properties relate to the issues that underlie the questions of intra-governmental *coordination* and forms of inter-state *negotiations* in IRFs. In the governance literature, the form of intra-governmental coordination has been addressed via the whole-of-government approach that can be contrasted with a sectoral approach (see e.g., Christensen & Lægreid, 2007). The whole-of-government approach refers to an integrated and horizontal coordination *within* governments and departments, possibly with civil society consultation, in contrast to a predominantly isolated top-down governmental style that tends to primarily activate particular sectors and departments that are directly affected. Literature on migration diplomacy mostly describes the cooperation structures and styles *between* governments (e.g., Adamson & Tsourapas, 2019). Generally, we can distinguish inter-state negotiations invoking more conditional (or coercive) negotiation styles from more consensual (or cooperative) ways of negotiations in which both parties define jointly and to a similar extent the substance of agreements and the process of negotiations (Tsourapas, 2017).

This leaves us with a categorization of return diplomacy based on two dimensions with two sub-dimensions each (Table 1).

Table 1: Analytical dimensions of return diplomacy

dimension	sub-dimension	value	description
regulatory properties	legal obligations	high	legally binding
		low	legally non-binding
	policy scope	wide	with explicit issue-linkage
		narrow	without explicit issue-linkage
organizational properties	intra-governmental coordination	integrated	whole-of-government approach
		isolated	sectoral approach
	inter-governmental negotiation	pre-determined	conditional diplomacy
		co-determined	consensual diplomacy

Thereby, the subdimension of regulatory properties is defined in a dichotomous manner, while the organizational properties are better described as a continuum. A legal framework can be classified as either legally binding or non-binding. Additionally, such a framework may either include explicit issue-linkages or lack them altogether. In contrast, intra-governmental coordination is rarely characterized by a fully isolated sectoral approach, with no horizontal cooperation across departments or by a fully integrated whole-of-government model with substantial involvement of all branches of government. Similarly, inter-governmental negotiations are often neither entirely consensual, based on equal determination of process and substance, nor solely driven by conditional diplomacy that is completely pre-determined. In consequence, the conceptualization allows for a clear-cut categorization of IRFs based on their legal characteristics. By contrast, the approaches in return diplomacy that are shaped by the organizational properties within and across governments, instead allow for placing different approaches along a continuum.

However, while this framework provides a valuable tool for categorizing and analyzing intergovernmental return frameworks, its relevance extends beyond classification. The underlying dimensions also offer insights into how different configurations shape both the effectiveness and legitimacy of return cooperation, highlighting their broader implications for theoretical and practical understanding of migration governance.

The regulatory perspective: Typology of Intergovernmental Return Frameworks

Based on the two sub-dimensions of the regulatory properties—the *policy scope* of an IRF as well as its *legal obligations*—we can develop a 4x4 typology.

This typology of IRFs, reflecting the legal dimension of return diplomacy, helps to categorize the broad set of bi- and multilateral cooperation frameworks related to return and readmission that have been developed over time. Table 2 captures the four types of IRFs that can derive from this distinction: *Readmission Arrangement*, *Readmission Agreement*, *Composite Arrangement*, and *Composite Agreement*. We choose the term ‘arrangements’ to distinguish legally non-binding cooperation from legally binding ‘agreements’. And we choose the label ‘composite’ to denote package deals that go beyond readmission-specific cooperation.

Table 2: Typology of Intergovernmental Return Frameworks

		policy scope	
		without explicit issue-linkage	with explicit issue-linkage
legal obligations	legally non-binding	Readmission Arrangement	Composite Arrangement
	legally binding	Readmission Agreement	Composite Agreement

The proposed classification of IRFs offers an alternative to both the prevailing scientific orthodoxy and the proliferation of terms used in practices in the field of return diplomacy. Some researchers in this

area have either fully relied on categories and labels used by practitioners, often leading to an overwhelming number of terms used to label cooperation frameworks, including 'Migration Partnership', 'Statement', 'Compact', 'Memoranda of Understanding,' 'Exchanges of Letters,' or 'Joint Declarations'. Most researchers, however, have opted for a more streamlined approach, distinguishing between formal/informal (or standard/non-standard) frameworks, resulting in a categorization limited to just two types of cooperation frameworks. This binary conceptualization of IRFs arises from the implicit assumption that these are either legally binding readmission agreements or legally non-binding frameworks with explicit issue-linkages. However, this categorization overlooks cases where cooperation frameworks do not fit neatly into either of these categories—such as legally binding agreements that include issue-linkages or legally non-binding frameworks focused solely on return and readmission.

Against this backdrop, the suggested typology of IRFs presented in this working paper seeks to strike a balance between both current approaches by retaining some of the established terms while clearly limiting the number of terms used to describe legal frameworks. This approach aims to remain closely tied to the field of practice, using terminology such as 'Readmission Agreement' or 'Readmission Arrangements' that are also used by states, while avoiding the oversimplification of a binary categorization or the dilution of analytical clarity that can arise from the invention of new terms. However, in contrast to the use of these terms in practice, the conceptualization sets clear conditions for the use of terms and applies them consistently. By adopting a four-type classification, we also aim to put forward a classification that is both empirically exhaustive and conceptually exclusive.

In the following, we illustrate the four types of IRFs using the European FAiR focal countries of this working paper—Germany, Italy, Poland, and Switzerland—and EU frameworks related to return. To this end, we draw on the *FAiR inventory* of IRFs, which systematically documents the substance and characteristics of all publicly accessible IRFs between 11 EU+ states and non-EU+ states, as well as those concluded by the EU with third countries, spanning from 2008 to 2024 (see Conte et al., 2025).

Readmission Agreements are legally binding, and their scope is narrow, limited to the issue of return and readmission. At the EU level, the readmission agreement with Georgia, dating from 2011, is a prime example. The same applies to all other EU Readmission Agreements (EURAs) that have been concluded from 2004 onwards. At the bilateral level, the agreement between Poland and Kazakhstan, called the 'Agreement between the Government of the Republic of Poland and the Government of the Republic of Kazakhstan on the readmission of persons' (signed in 2016), is a case in point that narrowly focuses on readmission and is legally binding. These readmission agreements constitute the traditional way to regulate the return and readmission of people.

Readmission Arrangements are cooperation frameworks that narrowly focus on readmission but are legally non-binding. The EU-Gambia framework, termed 'Good Practices Procedures on Identification and Return' (signed in 2018), serves as an example at the EU level. At the bilateral level, the 'Cooperation Agreement' between Italy and the Côte d'Ivoire (signed in 2023) is a case in point of such an arrangement, as it is legally non-binding but narrowly focuses on readmission, touching only on the issue of human trafficking in relation to this matter.⁴

⁴ The absence of explicit issue-linkages does not imply that negotiations over this IRF have not covered broader topics or interests. For example, the conclusion of this Readmission Arrangement coincides with the signature of an agreement on border control stations (Gouvernement de Cote d'Ivoire, 2023) and the investment of \$10 billion by an Italian company in the development of infrastructure to produce gas and oil (CNBC Africa, 2023).

A *Composite Arrangement* represents a type of international cooperation related to return and readmission that is both broad and non-binding. The EU-Afghanistan cooperation, ‘Joint Way Forward on migration issues between Afghanistan and the EU’ (signed in 2016), is one example of this type. At the bilateral level, the cooperation between Switzerland and Nigeria, specifically the ‘Memorandum of Understanding between the Swiss Federal Council and the government of the Federal Republic of Nigeria on the establishment of a migration partnership’ (signed in 2011), serves as an example where the categories of practice and analysis are identical. Migration partnerships have become the new standard for regulating return and readmission between EU+ states and non-EU+ states, as well as between the EU and third countries.

A *Composite Agreement*, finally, is characterized by being legally binding but covering more than just the narrow issue of return and readmission, or related aspects of migration policies. The framework between the EU and Kosovo, ‘Stabilisation and Association Agreement between the European Union and the European Atomic Energy Community, of the one part, and Kosovo, of the other part’ (signed in 2016), is a prime example of this type. Among the FAiR focal countries, the framework between Germany and Guinea, ‘Abkommen zwischen der Bundesrepublik Deutschland und der Regierung Guinea über die Zusammenarbeit im Bereich legaler und illegaler Migration’ (signed in 2019), presents an example of a legal framework that is not limited to readmission but is simultaneously legally binding.

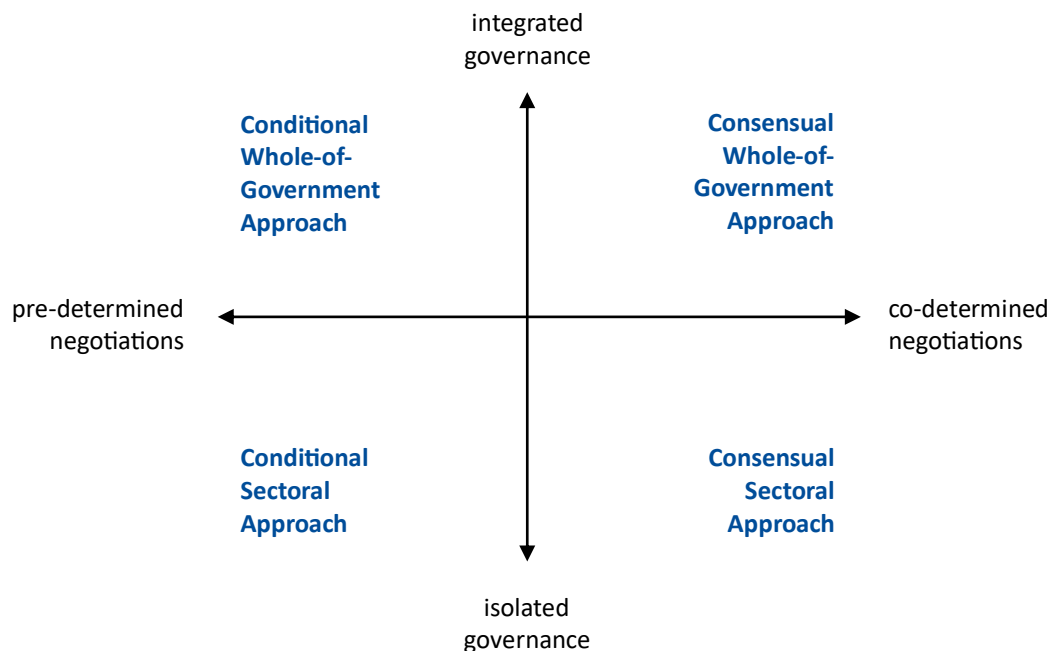
The organizational perspective: Communicative approaches to return diplomacy

The organizational properties relate to the social and communicative aspects of IRF governance. Thereby, both dimensions—intra- and inter-governmental cooperation—are not conceptualized as dichotomous categories but as a continuum. Hence, a government is not classified as either having fully established a whole-of-governance approach or fully relying on a sectoral approach and on pursuing either a consensual or a conditional approach in international cooperation. Instead, governments are perceived to have a certain degree of inter-state cooperation and international cooperation and classified as more or less consensual or conditional.

The relative positioning on both dimensions can be interpreted as the overall approach of a state to return diplomacy. This conceptualization is based on the insight that international cooperation is not only grounded in specific negotiation strategies vis-à-vis another state but also shaped by the organizational structure of both negotiating partners. It builds on but also expands current conceptualizations that mostly focus on the particular communication strategy and style between polities (see e.g., Tsourapas 2017).

Figure 1 illustrates the four ideal-typical communicative approaches in return diplomacy that can be identified based on this conceptualization: *Conditional Whole-of-Government Approach*; *Consensual Whole-of-Government Approach*, *Conditional Sectoral Approach*, *Consensual Sectoral Approach*.

Figure 1: Communicative approaches to return diplomacy



States can combine a very limited extent of inter-departmental cooperation that can be described as ‘isolated governance’ with a conditional style of migration diplomacy. In this way, the inter-governmental cooperation is mostly based on a top-down cooperation with governments activating particular departments based on their function and operating as silos for particular issues. When a government then mostly relies on politics of conditionality, the approach can be described as *Conditional Sectoral Approach*. In such an approach, one of the parties tries to impose specific pre-determined demands regarding both the substance and the process of international cooperation on return and readmission, deciding upon those conditions within a very limited set of actors within a government or polity. Typically, such an approach is possible when there are strong power asymmetries between both negotiation partners.

Alternatively, governments can try to concentrate mostly on establishing an open dialogue between the negotiation partners. Thereby, the aim is to develop jointly a cooperation framework that best suits the interests of both partners without setting any condition at the beginning and concentrating on a result that is perceived to be legitimate by both states. When this exchange is limited to particular branches of government, it can be dubbed a *Consensual Sectoral Approach*.

Moreover, a state can decide to combine a high level of intra-governmental coordination with an attempt to impose the conditions that have been gathered by a large inclusion of actors within the government on the other state. This approach in return diplomacy can be coined a *Conditional Whole-of-Government Approach*. In this approach, governments believe in the use of inputs from many branches of government to work out the best possible solution for the government, but then presume to be in the position to impose these positions on the other party.

Finally, a government can also decide to strengthen cooperation within a government to enable a widening of the cooperation areas and ensure a broad involvement of all actors. In addition, rather than presuming to impose the conditions for cooperation on the other party, they could try to engage in a more co-determined dialogue with a more open outcome of negotiations. Such an approach to

return diplomacy can be dubbed *Consensual Whole-of-Government Approach*. Such an approach may be more common when both parties have more symmetric distributions of power, and one party cannot impose its requests.

At least theoretically, the four ideal-typical approaches in return diplomacy can be combined with the four different types of IRFs.

Trends and patterns in Extra-European return diplomacy

To contextualize the particular characteristics of these six countries, we first provide a broader overview regarding the trends and patterns in extra-European return diplomacy. To this end, this section draws on two key sources: The *inventory of the bilateral agreements linked to readmission* (Cassarino n.d.) and the *FAiR inventory* (Conte et al., 2025).

The inventory by Jean-Pierre Cassarino is a comprehensive collection of return and readmission frameworks between European states and their partners, spanning from the 1950s to the present. It allows users to gain a broad overview of the landscape of IRFs readmission by the EU as well as by all European states, and some non-European countries. Specifically, it lists the existence and signature date of agreements between partner countries and categorizes each framework into two overarching types (standard/non-standard agreements) and multiple subtypes (e.g., Joint Way Forward, Exchange of Letters, etc.). However, it does not offer any insights regarding the substance of these cooperation frameworks.

The *FAiR inventory* (Conte et al. 2025), by contrast, allows users to zoom in as it offers systematic information on the substance of IRFs that have been closed between the EU and or eleven EU+ states with non-EU+ states, covering frameworks signed between 2008 and 2023. Hence, it offers an in-depth look at the evolving legal landscape of return diplomacy with non-EU+ states. In doing so, it tackles an important research gap, representing, to our knowledge, the first systematic data collection that provides nuanced insights into the very substance and the characteristics of IRFs.

To gain a broad overview of the temporal and geographical patterns of return diplomacy with non-EU+ states, we therefore first use the inventory by Cassarino (n.d.) before we zoom into the case studies using the FAiR inventory (Conte et al., 2025).

Temporal patterns of extra-European return diplomacy

Since the 1980s, we have witnessed the emergence and proliferation of IRFs between EU+ states and non-EU+ states. Until today, this has not only developed into a dense web of IRFs but also accounts for an actual globalization of European return diplomacy.

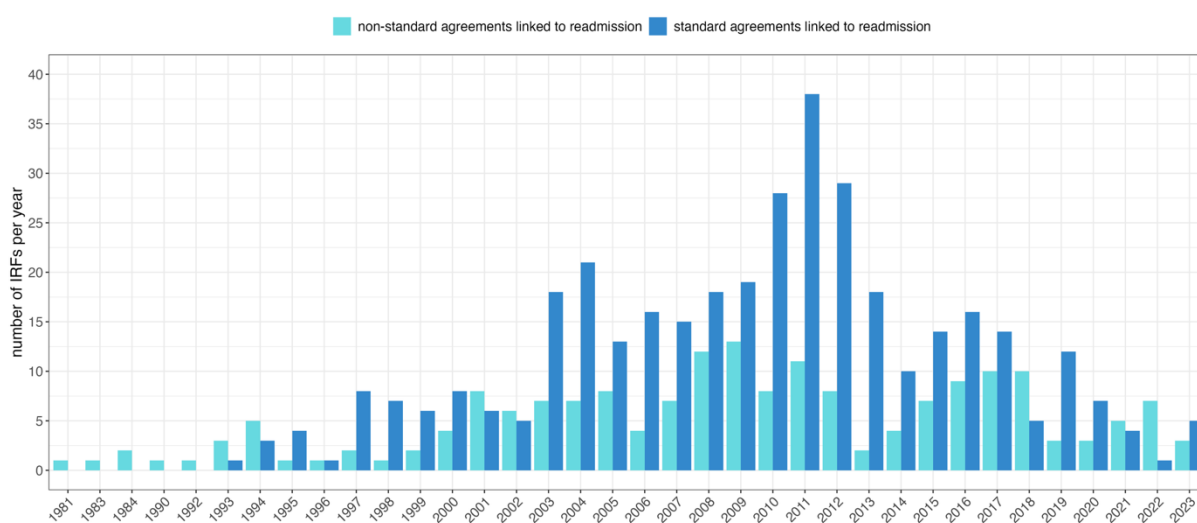
Introducing the *inventory of the bilateral agreements linked to readmission*, Cassarino (n.d.) differentiates between two main types of frameworks: Standard and non-standard agreements linked to readmission. Standard agreements are described as formalized frameworks that narrowly focus on readmission, including bi-/or multilateral readmission agreements, implementation protocols, or EU readmission agreements (Cassarino, n.d.). Non-standard agreements are characterized as ‘agreement or arrangement without necessarily formalizing their cooperation’ as they integrate readmission into broader cooperation frameworks (e.g., Police Cooperation Agreements or Partnership Agreements)

that may include readmission clauses or frameworks that manage readmission ‘through other channels’ such as Exchanges of Letters or Memoranda of Understanding (ibid.).

While what Cassarino describes as ‘standard agreements linked to readmission’ generally aligns with what we categorize as Readmission Agreements, most agreements labelled as ‘non-standard’ might fall under the category of Composite Arrangements. However, this may not always be accurate. For instance, Cassarino (n.d.) also includes ‘Police Cooperation Agreements’ as non-standard agreements, but these may not necessarily be classified as Composite Arrangements, describing legally non-binding agreements with wide policy scope. Furthermore, such a classification would not allow us to identify frameworks that, while focusing specifically on return and readmission and potentially be termed ‘agreements’, are legally non-binding. Categorizing frameworks into four types would require detailed knowledge of their content or assumptions about their legal nature and policy scope, which is only available when they are made publicly accessible and might therefore not accurately reflect the temporal evolution and representations of the four types of IRFs. Therefore, where we outline broader spatial patterns for temporal developments of the case study countries, we retain Cassarino’s terminology.

Figure 2 presents an overview of the temporal evolution of IRFs, detailing agreements signed by all EU+ states (including all EU and EFTA states as well as UK) with non-EU+ states from 1980 to 2023.⁵

Figure 2: Temporal evolution of formal and informal return and readmission frameworks for all EU+ states with non-EU+ states (1980-2023)



data source: Inventory of the bilateral agreements linked to readmission (Cassarino, n.d.)

The figure illustrates a continuous and sharp increase in standard agreements since the early 1990s. After two decades of steady growth, however, 2011 marks a turning point, with the number of standard agreements beginning to decline steadily, interrupted only by a brief uptick from 2015 to 2017. Non-standard agreements between EU+ states and non-EU+ states date back to the 1980s, but they were overshadowed by standard agreements from the mid-1990s, despite a modest increase in the 2000s

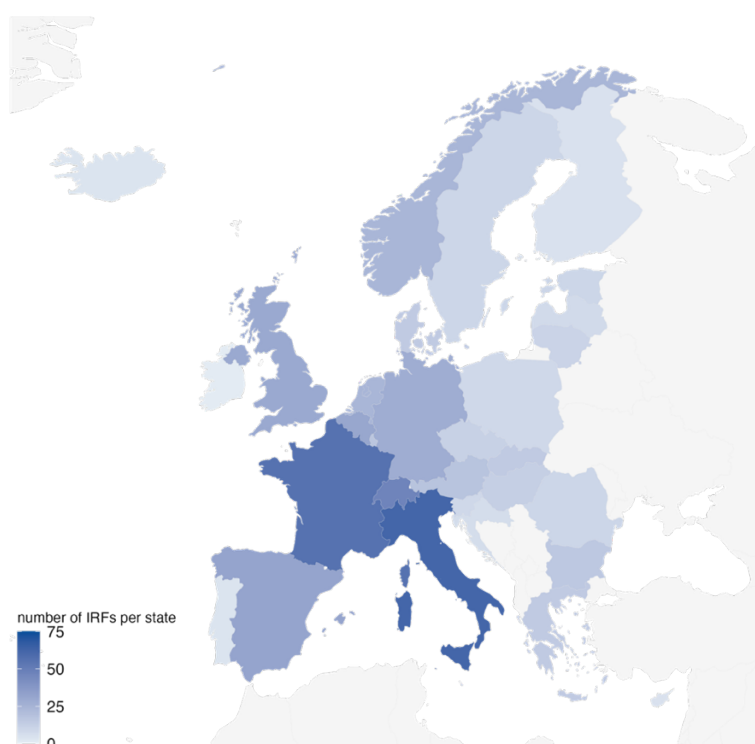
⁵ The temporal and spatial patterns laid out in this section include some intra-European return diplomacy such as the IRFs between EU+ states and European states that are neither EU nor EFTA members, particularly those of EU+ states with states from the Balkan region. However, since the FAiR project concentrates on EU and EFTA states as initiators of IRFs, including them to this group would blur the analytical lens focus and excluding them as partner states would downplay the extent of diplomatic activity by EU+ states in return and readmission.

and 2010s. In 2018, however, a significant shift occurred: non-standard agreements surpassed standard agreements for the first time in over two decades, and they have continued to outnumber them in most subsequent years. While conventional wisdom in migration studies suggests a *turn* towards informalization, the data from the inventory by Cassarino suggest not a dramatic shift from formal to informal cooperation. Instead, it shows a more gradual change—but by the substantial decline in standard agreements and not driven by a steep increase of informal frameworks.

Spatial patterns of extra-European return diplomacy

The temporal patterns identify the evolution of the landscape of return diplomacy with non-EU+ states. However, it does not reveal whether this was driven by a collective engagement of EU+ states or primarily by the activity of only a few European states. Figure 3, in contrast, sheds light on the spatial patterns as it reveals the driving forces behind extra-European return diplomacy.

Figure 3: Geographical patterns of Intergovernmental Return Frameworks by EU+ states with non-EU+ states (as of 2023)



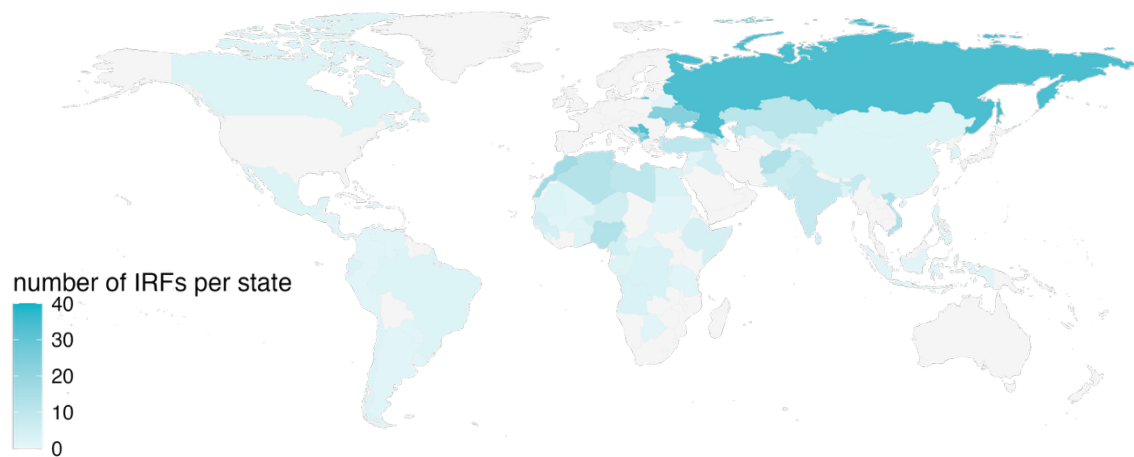
data source: Inventory of the bilateral agreements linked to readmission (Cassarino, n.d.)

The figure reveals a stark variation in the quantity of IRFs across EU+ states. The listed number represents the total frameworks between EU+ states and non-EU+ states. Thereby, each IRF with a non-EU+ state is counted individually, meaning that a country has multiple frameworks with the same non-EU+ state, each one is counted separately.

Italy (63 IRFs) and France (56 IRFs) stand out as states with the highest numbers of IRFs with non-EU+ countries. They are followed by Switzerland (47 IRFs) and Spain (32 IRFs), representing further countries with a relatively high number of IRFs with non-EU+ states. Notably, states at the Eastern EU external border are among those with the smallest number of IRFs: Greece has closed only 15 IRFs, Hungary has 13, Poland has 9, and Finland has secured IRFs with only 5 non-EU+ states. Given its strong political and economic position in Europe, Germany (28 IRFs) also has a comparably modest number of IRFs.

When focusing on the target countries of extra-European return diplomacy, we find that European states have closed IRFs with almost all states. Figure 3 provides an overview of the target countries and regions of return diplomacy with non-EU+ states.

Figure 4: Geographical patterns target countries of Intergovernmental Return Frameworks with EU+ states (as of 2023)



data source: Inventory of the bilateral agreements linked to readmission (Cassarino, n.d.)

The map illustrates the result of a vivid and truly global European return diplomacy. EU+ states have closed IRFs with countries of origin and transit in almost all world regions. Thereby, three areas stand out as main regions: the Balkans, North Africa, and the Caucasus.

Russia represents the state that is most deeply intertwined with EU+ states on return and readmission, with 34 IRFs being the partner country with the most IRFs with EU+ states. It is closely followed by Serbia, which has signed 33 IRFs with EU+ states. Further countries with an elevated number of IRFs include Bosnia and Herzegovina (29), Moldova (28), North Macedonia (27), Albania (22), Armenia (21), Montenegro (21), Georgia (18), Kosovo (19), Morocco (17) as well as Afghanistan, Algeria, Kazakhstan, Tunisia, and Vietnam (all 13).

The broad variations regarding the target countries of European return diplomacy reveal not only a geographical expansion of migration diplomacy. In addition, it reveals that European states have engaged not only with other democracies but also with a substantial number of autocratic states (see Stutz & Trauner, 2025).

Regulatory properties of extra-European return diplomacy

In this section, we focus on the ways in which the six focus countries of this working paper—Germany, Italy, Poland, and Switzerland, as well as Georgia and Nigeria—have engaged in extra-European return diplomacy. Put differently, we compare the number of IRFs concluded as well as the extent to which these states favor standard or non-standard frameworks and what policy areas they tend to connect in IRFs, if at all. Both the legally (non-)bindingness, which is connected with the standard/non-standard dichotomy, and the (non-)existence of explicit issue-linkages are the key dimensions of the regulatory properties of IRFs.

From formal to informal return frameworks

Figure 3 in this working paper has already revealed the large variation in the application of IRFs across EU+ states. Based on the inventory by Cassarino (n.d.) at the end of 2023, Italy (63 IRFs) is the European country with the largest number of IRFs, while Switzerland (47 IRFs) is ranked third, Germany (28 IRFs) is in the middle field and Poland (9 IRFs) is one of the countries with the fewest IRFs with non-EU+ states. For the same period, Nigeria is listed to have concluded 9 IRFs with EU+ states, and Georgia has signed 14 IRFs.

Figure 5 presents the distinct approaches of the six case study countries. The figure begins in 1994, as none of these six states entered into such a framework with (non-)EU+ states prior to that year. It illustrates the number and types of frameworks concluded by these states since then, differentiating standard from non-standard agreements on which the Cassarino inventory is based. While this categorization does not offer a perfect insight into the extent to which states favor legally binding or legally non-binding IRFs, it nevertheless allows us to draw some tentative conclusions: While standard readmission agreements are generally legally binding, non-standard agreements are often legally non-binding.⁶

Figure 5: Temporal evolution of formal and informal return and readmission frameworks for Germany, Italy, Poland, Switzerland, Georgia and Nigeria (1994-2023)



data source: Inventory of the bilateral agreements linked to readmission (Cassarino, n.d.)

⁶ However, what complicates this categorization is that the inventory of Cassarino also lists agreements such as 'Implementation Protocols' as non-standard agreements and generally is not based on the actual text of the IRFs, which would be required to undoubtedly classify a framework as legally binding or legally non-binding. The FAIR inventory, by contrast, would allow for such a classification of all IRFs but depends on the public availability of these IRFs by states and would therefore is better suited for a qualitative exploration, not for drawing broader and representative patterns.

Figure 5 illustrates the varying approaches and the different salience of return diplomacy for the six states under analysis. Germany has predominantly relied on formal, usually legally binding agreements. Only in recent years has the country broadened its repertoire to include non-standard agreements. Poland represents the only one of the four European countries that has exclusively signed standard agreements with non-EU+ states, and it has concluded the fewest agreements overall.

Italy stands out not only as the state with the highest number of IRFs but also as having embraced a strong focus on informal agreements from early on. Italy's proactive approach in prioritizing such agreements has positioned it as a trailblazer for other European states. This robust engagement can likely be attributed to Italy's role as a key EU external border country and a major European destination for migrants. Switzerland, while also highly active in return diplomacy, has historically concentrated more on standard agreements, although it has expanded its approach since 2011.

Georgia and Nigeria both exhibit limited enthusiasm for entering into IRFs with EU+ states. However, they represent two fundamentally different approaches. Georgia has exclusively signed standard agreements, reflecting a clear preference for legally binding frameworks or a willingness to accept the preferences of their counterparts. This inclination may be understood in the context of Georgia's aspirations for EU membership or closer cooperation with the Union. In contrast, Nigeria has predominantly signed non-standard agreements, showing little appetite for legally binding commitments on return and readmission.

Overall, we can thus categorize Italy as a trailblazer country that has focused on non-standard agreements from an early stage, a path followed by Switzerland and, very recently, Germany. Poland stands out with a limited number of IRFs and its unique reliance on formal agreement. The European focus countries thus present not only different levels of engagement in return diplomacy but also different approaches. The trend goes in the direction of more informal agreements, which are usually legally non-binding. On the other end, the different approaches by Nigeria and Georgia may also reflect their different position towards the EU+ states. While Georgia is an EU neighbouring country, and since 2023 officially a candidate country that has greater interests in well-regulated relations with EU+ states, Nigeria has no such interests and greater leverage and resistance when negotiating IRFs.

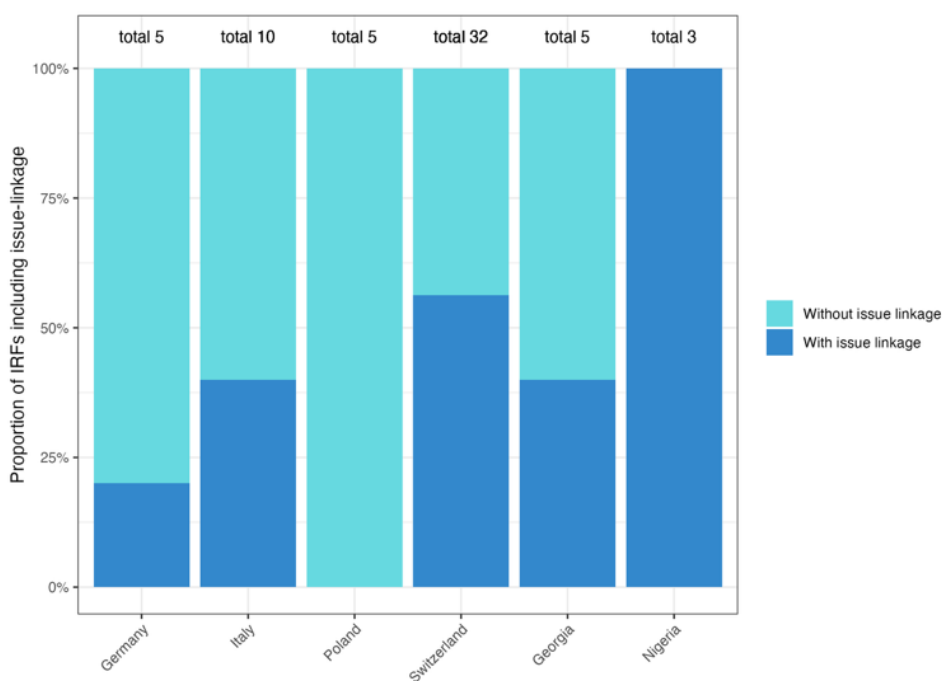
State preferences in linked policy fields

The (non-)existence of explicit issue-linkages of IRFs represents the second dimension of the regulatory properties. Using the *FAiR inventory* (Conte et al. 2025), we can explore the extent to which different types of agreements employ issue-linkages and examine the policy areas connected in return diplomacy.

In this context, *issue-linkages* refer exclusively to *explicit* linkages—identifying frameworks that mention policy areas beyond return and readmission, without assessing whether these agreements coincide temporally with the closure of frameworks in other policy fields, which may account for the use of implicit issue-linkages. Furthermore, the FAiR inventory only includes frameworks concluded by the EU and 11 EU+ states with non-EU+ states between 2008 and 2023, and only those agreements that are publicly accessible. As a result, the number of agreements listed and analyzed is particularly limited for countries that do not publish such frameworks. While this exploration thus offers valuable insights into explicit issue-linkages, it should not be generalized, as the published frameworks may either over-represent or under-represent those with explicit linkages and generally be complemented with other sources, such as expert interviews.

Figure 6 illustrates the extent to which the six states under analysis utilize issue-linkages and provides the total number of IRFs available for analysis. It should be noted that one IRF can include several issue-linkages. The figure also highlights a major limitation of the analysis: the relatively small number of IRFs that are publicly available and open to public and academic scrutiny. Specifically, it shows the number of IRFs that Germany, Italy, Poland, and Switzerland have concluded with non-EU+ states after 2008, which were publicly available and could be included in the FAiR inventory. For example, thirty-two of Switzerland’s IRFs with non-EU+ states were publicly available at the time of coding, while ten such IRFs were available for Italy, and five each for Germany and Poland. Since the FAiR inventory focuses on IRFs concluded by eleven European states and the EU, the five IRFs listed for Georgia and three for Nigeria refer only to those concluded with these states or the EU.

Figure 6: Total and proportional agreements of return agreements with and without explicit issue-linkage for Germany, Italy, Poland, Switzerland as well as Georgia and Nigeria (2008-2023)

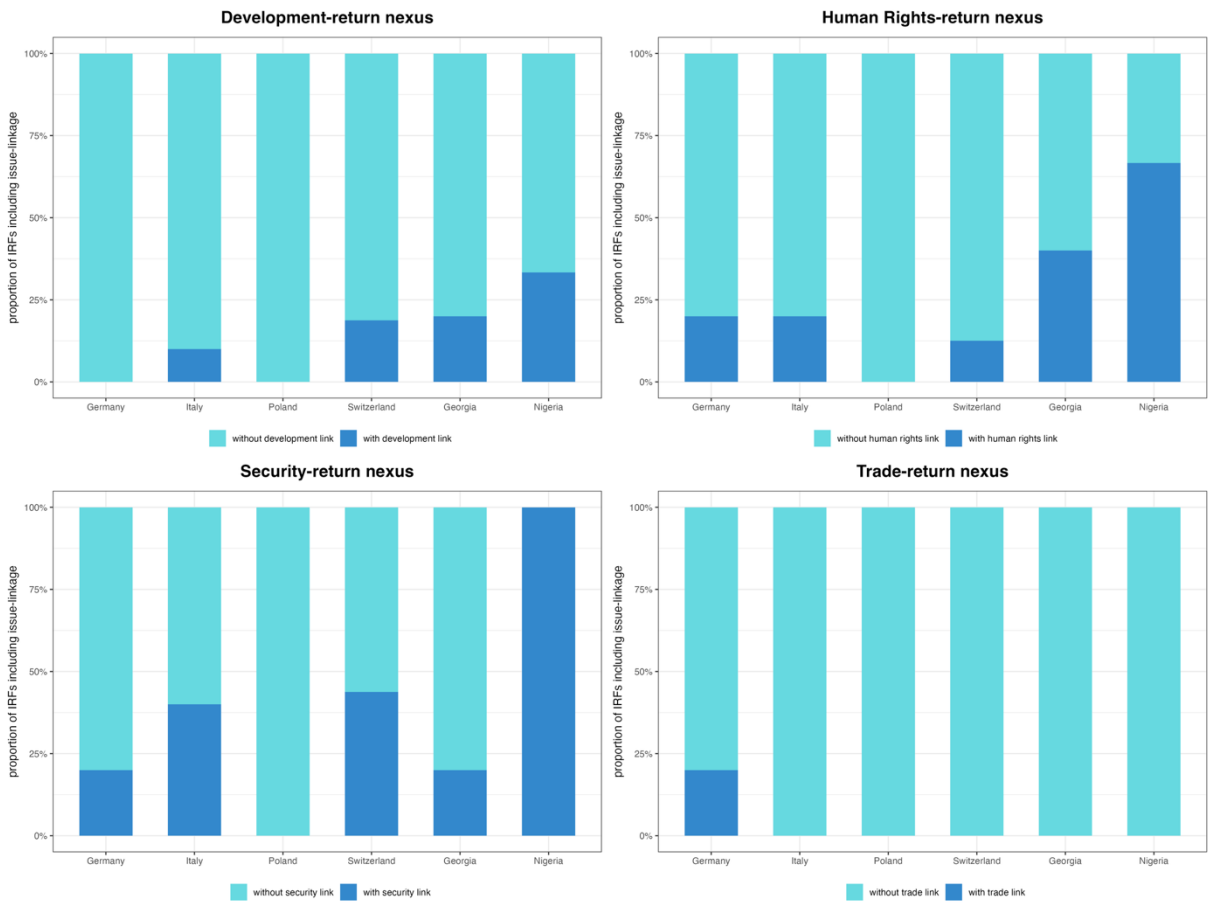


data source: FAiR inventory (Conte et al., 2025)

At one extreme, Poland appears to exclusively conclude IRFs without any issue-linkages, while Nigeria, at the other end of the spectrum, seems to have only signed (publicly available) frameworks that include issue-linkages. Among the EU+ states with issue-linkages, Germany, with less than one-fourth of published IRFs including linkages, contrasts with Switzerland, which stands out as the European country with the largest proportion of IRFs that feature explicit issue-linkages in this country sample. Given that Switzerland has published the majority of its IRFs, the findings presented here also reflect a broader pattern for the country.

Figure 7 offers a detailed breakdown of the policy areas linked to return, distinguishing between the development, human rights, security, and trade-return nexus.

Figure 7: Total and proportional agreements of return agreements with and without development, human rights, security, and trade-return-nexus for Germany, Italy, Poland, Switzerland, Georgia and Nigeria (2008-2023)



data source: FAiR inventory (Conte et al., 2025)

Figure 7 illustrates that human rights and security—arguably the two most contrasting policy areas—are most frequently linked implicitly to the issue of return and readmission. Only a few states directly link development aid with return, and Germany is the sole state that ties trade agreements to return frameworks. However, this does not imply that trade is absent from return diplomacy, as trade deals are often negotiated in parallel. In fact, research has shown that trade agreements frequently include migration and return provisions, a diplomatic practice sometimes referred to as *quiet politics* (Hoffmeyer-Zlotnik, 2024; Lavenex et al., 2023). Notably, non-European states such as Nigeria—and, to a lesser extent, Georgia—are more insistent on including human rights provisions, indirectly signalling their policy priorities and potentially expressing reluctance to negotiate narrow agreements that focus solely on return while sidelining human rights concerns.

Case studies I: Intra-governmental coordination in return diplomacy

The FAiR project investigates return diplomacy in Germany, Switzerland, Italy, Poland, as well as Georgia and Nigeria. Based on the insight that intra-governmental cooperation is shaping inter-governmental cooperation, we first describe the structure and communication within the six case study countries. Intra-governmental cooperation on return and readmission describes the extent to which horizontal coordination takes place between departments. However, besides the level of coordination, it is also affected by which actors are in the lead of the negotiations and what priority the issue of return and readmission has within an administration, as well as the public and political discourse more generally.

Italy: A flexible yet centralized cooperation structure

Since the 1990s, concluding agreements on return and readmission has been a top priority for Italy. This high level of prioritization is largely due to Italy's geographical position as a first-arrival country for people seeking protection crossing the Mediterranean. This role has been further reinforced by the Dublin Regulation, which, in many cases, assigns legal responsibility for examining asylum applications and providing protection to EU member states located at the external border. The fact that Italy is the European country that has the highest number of IRFs with non-EU+ states clearly reflects the importance of return diplomacy for the Italian government.

The Central Directorate for Immigration and Border Police, which falls under the Ministry of the Interior, plays a leading role in Italian return diplomacy (IT1). The Central Directorate for Immigration and Border Policy oversees all immigration offices within police headquarters across the national territory, as well as border police offices. Its operational expertise in these areas enables it to name the issues and provisions that should be incorporated into IRFs. In inter-state negotiations, its role is oriented on the content of IRFs. Thereby, the Border Police identifies priorities but also responds to the demands of partner countries (IT1). As a central entity within the Department of Public Security, the Border Police is formally involved in extra-European return diplomacy through the department's Secretariat. The Secretariat, in turn, interacts with the Minister of the Interior's Cabinet, particularly the International Affairs Office. Requests for consultation and feedback on agreement texts typically follow this structured communication pathway. Notably, non-governmental actors are entirely excluded from this process, reinforcing a rather security- and control-driven approach to negotiations that is also reflected in the issue linkages of IRFs by Italy with non-EU+ states.

Within the continuum between a sectoral approach on the one end and a fully established whole-of-government on the other end, in which departments are not only formally consulted but substantially heavily involved, the Italian case can most likely be placed within these two extremes. While the Italian approach ensures a formal involvement of various departments, it is strongly coordinated at a central level by the Central Directorate for Immigration and Border Police, arguably with less substantial involvement of other departments. However, the activated government structure also depends on the type of IRF that is negotiated. A formal Readmission Agreement, for example, is coordinated and signed at a higher political level. In such negotiations, only directly affected ministries and departments are involved, without any consultation of not directly affected branches of government (IT1). A memorandum of understanding, in contrast, is negotiated at the technical level and not signed at the government level, but, for example, by the chief of police (ibid.).

Poland: A sectoral approach with minimal horizontal coordination

In comparison with other states of this country sample, Poland has evolved relatively recently from a country of emigration and transit to a country of immigration. This may also be one of the main reasons why Poland represents the country with the smallest number of IRFs with non-EU+ states among the European FAiR focus countries. Thereby, most of Poland's IRFs have been closed with states in neighboring regions, with the exception of a framework concluded with Vietnam in 2005. In its negotiations, Poland generally focuses narrowly on the issue of return and readmission, striving to convince partner countries of the benefits of such frameworks (PL4). In consequence of the exclusion of issue linkages, there is no need for extensive inter-departmental coordination, and the approach can be best described as a sectoral approach.

The international cooperation for IRFs is mostly in the hands of the Border Guard, which operates under the supervision of the Ministry of the Interior and Administration (PL1; PL2; PL3; PL4). The Border Guards' role is to negotiate IRFs and drafting of frameworks that strive to reconcile the interests and legal systems of both partner states. To this end, the Border Guard must first obtain the consent and mandate with precise instructions over the mandate for negotiations by the Council of Ministers. This is the formally authorized body to conduct negotiations that set out the scope of negotiations, provide consent for negotiations, and ultimately to sign an IRF (PL4). The role of the Ministry of Foreign Affairs is overall described rather as peripheral. While some claim that the Ministry of Foreign Affairs is not involved at all and only has very limited communication with the Border Guard (PL2), others point out that it is engaged in a procedural way to negotiate cooperation frameworks or instruct negotiations by the Polish Border Guard (PL3).

While the negotiation mandate of the Border Guard is strictly limited to the issue of return and readmission, the Polish authorities do not categorically rule out the possibility of issue-linkage, if the negotiation partner demands entering parallel negotiations over other issues, in the future. In such a case, the Polish state, not the delegation of the Border Guard, has the possibility to link negotiations over IRFs to other policy fields such as visa facilitation (PL4). However, the ability to link return and readmission with visa facilitation is also constrained by the EU's responsibility in this field. At the time of writing, Poland appears to have stepped up its engagement in return diplomacy, being in negotiations with several non-EU+ states over IRFs (PL3). Consequently, Poland may not only extend its web of IRFs with non-EU+ states beyond its geographical neighborhood but also turn towards negotiations that span across a broader set of policy fields. Such a development would also imply widening the negotiation delegation and shifting from a sectoral approach to an approach that involves stronger communication across currently not involved government departments.

Germany: A restrained whole-of-government approach

In 2023, Germany established the position of the Special Commissioner for Migration Agreements (*Sonderbeauftragter*) within the Federal Ministry of the Interior and Community (BMI). The role of the *Sonderbeauftragter* is to consolidate and coordinate migration-related policies rather than act as a dedicated return commissioner. The creation of this new position marked an increasing political focus on migration policy, particularly the reduction of irregular migration and the promotion of regular migration pathways. The coalition government of chancellor Scholz (2021–2025) explicitly committed to restructuring migration policy through a more coordinated, long-term approach, integrating return policies with labor migration and development cooperation. However, despite these ambitions, intra-

governmental coordination has proven to be complex and, at times, constrained by bureaucratic inefficiencies and overlapping responsibilities.

There are diverging views on the extent of intra-governmental cooperation in Germany. Some interviewees (DE1) stress that Germany applies a whole-of-government approach to migration cooperation, pointing to an inter-ministerial working group that brings together nine federal departments, including the Ministry of the Interior, the Ministry of Finance, the Ministry of Labour, and the Ministry for Economic Cooperation and Development, alongside the Federal Chancellery. Other interviewees (DE2), however, find that intra-German coordination is nevertheless weak and foreground that agencies such as the Ministry of Labour are free to set their own priorities and target countries with only formal supervision by other ministries and offices, and the potential involvement of German embassies and country desks in Foreign Affairs Departments.

While the aim to establish a whole-of-government approach is intended to ensure a comprehensive strategy, it has also led to challenges in streamlining decision-making and defining clear mandates. The sheer number of involved actors has often resulted in slow progress, administrative bottlenecks, and conflicting priorities between ministries. Additionally, intra-governmental cooperation extends beyond the federal level, requiring coordination with the *Länder*, particularly in return operations where this sub-national level holds responsibility. The Federal Employment Agency also plays a role in facilitating skilled migration, but its efforts must align with multiple ministries and federal authorities. While Germany has increasingly engaged in return diplomacy, internal governance challenges persist, raising questions about the efficiency and coherence of its approach.

Switzerland: The shift towards a whole-of-government approach

The year 2011 marked a turning point in the evolution of Swiss migration diplomacy. Until then, migration had been a relatively peripheral issue in Swiss foreign policy and entangled in a complex governmental structure under the lead of the Department of Foreign Affairs (CH2). However, 2011 saw the adoption of a more comprehensive, whole-of-government approach headed by the then-Federal Office for Migration (FOM, later State Secretariat for Migration SEM). A significant step in this transformation was the creation of a Special Ambassador for International Cooperation on Migration Issues in 2009, further strengthening Switzerland's migration diplomacy. Additionally, the establishment of the 'Plenum of the Interdepartmental Working Group on Migration' (IAM Plenum) streamlined interdepartmental cooperation, giving the Federal Department of Justice and Police, to which the FOM and SEM are associated, a more prominent role while the Federal Department of Foreign Affairs remained a co-chair (CH1; CH2).

These reforms were the result of a broader evaluation process, tracing back to the establishment of the Interdepartmental Working Group on Foreign Policy and Migration and Return (IDAG Migration) in 2004. The shift was driven by the realization that migration and return policies had limited effectiveness and that return migration issues were gaining importance (CH2). The Swiss government also recognized that a narrow focus on formal readmission agreements did not meet the needs and interests of third countries, which had demands in other policy areas (CH3). This understanding led to the need for better coordination on the Swiss side. In consequence, it led to the prioritization of Migration Partnerships as key instrument in Swiss migration and return diplomacy (CH1; CH2).

While these changes restructured Swiss migration governance, they also aligned with Switzerland's long-standing tradition and development towards intergovernmental cooperation at both bilateral and

multilateral levels across departments (CH3). The country benefits from networks and partnerships established through initiatives such as the Berne Initiative (2001–2003), its involvement in the UN High-Level Dialogue on International Migration and Development (UNHLD), and participation in the Global Forum for Migration and Development (GFMD). Key federal actors included the then-Federal Office for Migration (later SEM), the Federal Department of Foreign Affairs, the Swiss Agency for Development and Cooperation, the State Secretariat for Economic Affairs, and the Federal Office of Police. These institutions played a vital role in ensuring effective coordination in multilateral migration dialogues, reinforcing Switzerland’s commitment to international migration cooperation.

Georgia: Fragmented responsibilities in return governance

Interdepartmental coordination in Georgia’s return diplomacy has been characterized by a selective and security-driven approach. The Ministry of Foreign Affairs (MFA) generally plays the central role in negotiations, with support from the Ministry of Internal Affairs (MIA) and the State Commission on Migration Issues (SCMI). The MIA is directly involved in negotiations and contributed to drafting agreements, reinforcing its role in return policymaking (GE1; GE5). However, the Ministry of Labour, Health, and Social Affairs (MoHLSA) has generally been absent from this process, largely due to its limited responsibilities. This exclusion indicates that return negotiations have prioritized legal and security concerns over reintegration and social aspects.

The process of interdepartmental coordination suggests a sectoral rather than an integrated, whole-of-government approach. While the MFA and MIA were the primary actors, MoHLSA’s exclusion, despite its relevance to reintegration, points to a functional gap in Georgia’s migration governance. Although international organizations such as IOM, UNHCR, and ICMPD may have played a role (GE4), their exact contributions have not been formalized. The limited involvement of external actors suggests that international expertise was not systematically incorporated, reducing the scope for a more comprehensive return and reintegration framework.

Georgia’s preference for formal IRFs instead of informal ones also reflects its cooperation pattern. The exclusion of other ministries reinforces the focus on security and legal aspects in comparison to other policy fields. The overall structure of Georgia’s migration diplomacy remains primarily driven by state security concerns, with limited cross-sectoral cooperation and little emphasis on long-term reintegration strategies.

Nigeria: Structured coordination, low political priority

Interdepartmental coordination in Nigeria’s return diplomacy follows a structured but low-priority approach, with the Ministry of Foreign Affairs (MFA) leading negotiations with external partners. Other agencies, such as the National Commission for Refugees, Migrants, and Internally Displaced Persons (NCFRMI), the National Agency for the Prohibition of Trafficking in Persons (NAPTIP), the Ministry of Labour (MoL), and the Ministry of Justice (MoJ), are involved to varying degrees (NG2). The MoJ plays a key role in assessing the legal conformity of agreements, while the MoL primarily focuses on bilateral labour agreements (NG3). However, despite being part of the process, the NCFRMI reports limited familiarity with negotiations over return and readmission (NG6), suggesting that return migration is not a major priority within Nigeria’s broader migration governance.

Although Nigeria’s institutional framework allows for a structured interdepartmental exchange, return and readmission policies do not appear to be a strategic focus. IRFs are circulated for comments among

agencies, but the extent to which these agencies actively shape negotiations remains unclear. Moreover, data collection did not establish significant involvement of extra-governmental actors, such as civil society or international organizations, in shaping return agreements with European or bilateral partners. Reports from both state and non-state actors suggest that engagement on return issues is minimal (NG4; NG5), reinforcing the perception that return migration is not a high-priority topic for the Nigerian government. This lack of emphasis on return policies contrasts with Nigeria's more active engagement in areas such as labour migration and anti-trafficking efforts, where institutions like MoL and NAPTIP take on more prominent roles.

While the Nigerian government, through the Ministry of Foreign Affairs and other relevant agencies, leads the negotiations on readmission agreements, the country does not exhibit a strong strategic approach to shaping IRFs. The EU Delegation saw this limited coordination in Nigeria as a key factor affecting the process (EU3), while the Swiss delegation reports a smoother coordination process, indicating a contrasting perception of Nigeria's approach to interdepartmental cooperation (CH4). Overall, Nigeria's approach to return diplomacy is characterized by formal ministerial involvement but a lack of strong political prioritization or cross-sectoral engagement.

Case studies II: Inter-governmental cooperation in return diplomacy

In this section, we shed light on four examples of international cooperation between EU+ states (or the EU) with non-EU+ states. We select four different cases of international cooperation that resemble one of the four ideal-typical approaches in return diplomacy: the Readmission Agreement between the EU and Georgia of 2010 (Conditional Sectoral Approach), the Implementation Protocol between Poland and Ukraine of 2017 (Consensual Sectoral Approach), the negotiations between the European Commission and Nigeria over an EU Readmission Agreement, which began in 2016 but are still ongoing (Conditional Whole-of-Government Approach), and the Migration Partnership between Switzerland and Nigeria that was established in 2011 (Consensual Whole-of-Government Approach). Thereby, the distinction between a sectoral approach and a whole-of-government approach is primarily based on the analysis of intra-governmental cooperation within the European partner. However, generally, intra-governmental coordination across negotiation partners tends to influence or mirror each other, at least to some extent.

The Readmission Agreement between the EU and Georgia of 2010

In 2010, the EU and Georgia signed the 'Agreement between the European Commission and the Democratic Republic of Georgia on the readmission of persons residing without authorisation'. The conclusion of this EU Readmission Agreement took place within the broader political context of Georgia's aspirations for closer integration with the EU. Its signing coincided with the launch of the EU's *Eastern Partnership* initiative, established in 2009 to strengthen relations with Eastern European and South Caucasus countries. However, the foundations for this cooperation were laid earlier, through the *EU-Georgia Action Plan* (2004–2009), which articulated the strategic objectives of bilateral engagement. The Action Plan identified migration management—including readmission, visa policy, and asylum—as a key priority under the rubric of 'Enhance cooperation in the field of justice, freedom and security, including the field of border management' (EEAS, n.d.). It explicitly anticipated that cooperation in these areas could culminate in a readmission agreement (ibid.). Despite these early steps, Georgia's path toward EU membership remained protracted; it was only in 2023, amid shifting

geopolitical dynamics following Russia's war against Ukraine, that Georgia was formally granted EU candidate status.

The EU-Georgia Readmission Agreement of 2010 largely adheres to the established template of the EURAs, which shaped eighteen such agreements concluded between 2002 and 2020. It legally codifies obligations for the readmission of their own nationals, third-country nationals, and stateless persons for both contracting parties. The implementation, regulated through an implementation protocol, is overseen by a Joint Readmission Committee. While its decisions are legally binding (European Commission, 2010), their practical impact is limited (EU1). During the process of negotiation, various Georgian ministries and departments were formally consulted and provided comments on the draft agreement (GE1). The agreement is characterized by a high degree of pre-determination, largely reflecting the EU's interests and preferences in its relations with Georgia on return and readmission. The final outcome follows the established EU standard agreement to such an extent that it appears to be less the product of a genuine *consensus*—where the positions and interests of both parties are equally reflected—and more a *conditional* imposition by the EU. This dynamic is underscored by the fact that signing the readmission agreement was made an explicit precondition for advancing Georgia's visa liberalization process and progress in the EU accession procedure (GE1; GE4).

During the negotiations with the EU, the Georgian Ministry of Foreign Affairs (MFA) served as the lead agency (GE1). It was seconded by the Ministry of Internal Affairs (MIA), which includes the Migration Department, which also substantially contributed to the drafting process. Other departments played seemingly only a minor role, via formal consultation (ibid.). Potentially relevant ministries for broader negotiations across policy fields, such as the Ministry of Health, Labour and Social Affairs (MoHLSA), were not involved at all (GE4). The seemingly limited communication and coordination across the Georgian ministries during the negotiation process, the lead by the core agency for foreign affairs and the directly affected ministry, suggests a sectoral approach in EU-Georgian negotiations on return and readmission. This sectoral dynamic seems to have been shaped not only by power asymmetries between the negotiating partners but also by broader trends in negotiations over return and readmission, particularly at the time the agreement was signed in 2010.

On the EU side, the negotiations were led by the European Commission, which was mandated to negotiate on behalf of the European Council (EU1). The process was primarily conducted from the Commission's headquarters in Brussels, while the EU Delegation in Georgia played a more supportive role, facilitating contacts and handling organizational matters. The relatively limited role of the Delegation reflects its lack of formal authority over the substance of the agreement, as the negotiation mandate and final terms required coordination between the Commission and the European Council. Once concluded, the agreement was subsequently ratified by all EU member states.

Despite being rather shaped by power asymmetries with the EU leveraging its politics of conditionality and the agreement rather resembling a *conditional* than a genuine *consensual* approach, the agreement is perceived by both sides as positive and uncontentious (GE1; EU1; GE4). The EU regards cooperation with Georgia as a model for readmission policy (EU1). The Georgian side, which does not voice any substantial concerns about the agreement's content or implementation (GE1), maintains a cooperative stance, as evidenced by a relatively high return rate (EU1). Importantly, Georgia remains committed to the belief that cooperation on readmission will advance its EU accession ambitions, avoiding the use of non-cooperation as leverage. In this sense, the *carrot* of visa liberalization and

potential EU membership also functions as a latent *stick*, as any withdrawal from cooperation could jeopardize these gains.

Beyond the institutional dynamics, other structural factors may also underpin Georgia's cooperative posture. Demographic trends—particularly concerns about emigration in the context of a shrinking population—may encourage the government to manage outward mobility more carefully (DE3). Moreover, economic incentives such as the Deep and Comprehensive Free Trade Area (DCFTA), viewed by Georgian respondents as a powerful instrument of integration and a significant *carrot* for compliance with EU demands, further reinforce Georgia's alignment with the EU on readmission and related matters (ibid.). To date, what may be seen as a *conditional sectoral approach* on the issue of return and readmission, rooted in the EU's exercise of power, appears to leave both sides equally satisfied.

The Implementation Protocol between Poland and Ukraine of 2017

In 1994, Poland and Ukraine signed their first standard readmission agreements (Cassarino, n.d.). This bilateral cooperation was complemented in June 2007 with the EU Readmission Agreement with Ukraine, which also applies to Polish-Ukrainian practice. A decade later, in April 2017, both countries signed the 'Implementation Protocol between the Government of the Republic of Poland and the Cabinet of Ministers of Ukraine to the Agreement between the European Community and Ukraine on Readmission' in Warsaw. Notably, Ukraine initiated the negotiation of the implementation protocol, seemingly following strong opposition to the idea circulating in the European Commission and Ukrainian think tanks suggesting Ukraine could become a containment country for people without a valid residence permit in Europe (PL1, 3).

The cooperation on return and readmission that culminated in the 2017 Implementation Protocol was grounded in long-standing, trusted relations between Poland and Ukraine—especially at the technical level between their respective Border Guards (PL1). Both sides had a strong interest in establishing effective cooperation and concluding an agreement. For Ukraine, key motivations included preventing a containment country for people without a valid residence permit in Europe, but also the ambition of deepening ties with Europe in line with its broader geopolitical orientation (ibid.). Ukraine also sought to ensure the agreement served its own interests, advancing technical issues related to border and migration management. For Poland, Ukraine's role as a large neighbouring country made functional cooperation on return and readmission a particular priority (PL2).

The negotiations on the implementation protocol were marked by a relatively consensual style and a comparatively high degree of co-determination. However, some challenges arose, largely related to internal communication and procedural formalities. While cooperation between the Polish and Ukrainian Border Guards was well established and trusted, the division of responsibilities—where only the 'accelerated procedure' was handled by the Border Guards, while the 'regular procedure' fell under the Ministry of Interior of Ukraine—caused some difficulties (PL2). The involvement of the Ukrainian Ministry of Interior, demanding particular communication channels for handling readmission requests, temporarily led to a 'clash of bureaucracies' (PL1). Nevertheless, the negotiations were widely regarded as a genuine good-faith dialogue, in which both sides were able to voice their interests and concerns. This consensual negotiation style by the Polish authorities is based on direct meetings held over several days, which shall enable careful analysis and clarification of positions (PL4).

The Polish approach to return and readmission can be seen as largely sectoral, with limited horizontal coordination across government departments. This qualifies the Poland-Ukrainian agreement as a case of *Consensual Sectoral Approach*. The Border Guard leads on the issue of readmission, formally operating under the authority of the Ministry of Interior and Administration (PL1; PL2; PL3; PL4). The Ministry of Foreign Affairs is formally in charge of international cooperation and diplomatic outreach, but otherwise not involved in return and readmission (ibid.). As in other negotiations, the Polish Ministry of Foreign Affairs faced the dilemma of whether to prioritize diplomatic personnel, who were skilled negotiators but less familiar with operational details, or to rely on Border Guards and liaison officers, who knew the protocol's practicalities but lacked negotiating experience (PL1). The agreement's content, focused primarily on the Polish and Ukrainian Border Guards, with only limited reference to migration services, and its narrow focus on readmission reflects its sectoral character. Given the mutual interest in effective cooperation, and with Ukraine itself initiating the negotiations, there was little perceived need to expand the negotiation framework across other policy areas as it is done by Poland in other negotiations (PL3). Formally, the protocol was signed at the political level, on behalf of the Polish President and the Cabinet of Ministers of Ukraine, as it is foreseen by the national legislation (PL4).

Although the exact impact of the 2007 EU-Ukraine Readmission Agreement (EURA) remained somewhat unclear to both sides—whether it duplicated, facilitated, or complicated bilateral cooperation on readmission (PL1; PL2)—codifying their bilateral relationship was ultimately viewed as a positive step by both states. In addition to the strong trust between the respective Border Guard services, which preferred to manage readmission cases themselves rather than defer to more centralized national authorities, two other factors likely shaped the cooperative tone on the Ukrainian side. First, the stakes in these negotiations were relatively low for Ukraine, as the number of readmission requests has traditionally been modest (PL1). Second, Ukraine saw the agreement as an opportunity to present itself as a reliable and responsible partner to the EU and its member states. At the time of negotiations with both the EU and Poland, the broader goal of deepening ties with the EU, whether through membership, an association agreement, or at least securing and maintaining visa facilitation (see also Bolkvadze, 2000), clearly played an important role. Reflecting this broader positioning, Ukraine actively showcased the implementation of the EU-Ukraine readmission agreement as one of its 'most effective' on its official website (Ukraine, 2019). In doing so, it positioned itself as a strong adherent to EU demands and a key enabler of effective migration management.

A decade of EU-Nigeria negotiations over a Readmission Agreement

For more than two decades, Nigeria has been one of the EU's priority countries for closer diplomatic relations on migration and mobility. Already in 2004, under the Irish Presidency, the EU called for closer diplomatic relations and political dialogue. In 2009, the EU and Nigeria formally strengthened their relations by adopting the 'Nigerian-EU Joint Way Forward' (EEAS, n.d.). This framework is based on the aims and principles of the revised 'Cotonou Partnership Agreement' between the EU and the African, Caribbean, and Pacific Group of States, signed in 2000. However, the 'Joint Way Forward' does not address the issue of return or readmission and refers only vaguely to migration. In 2012, the EU and Nigeria signed a Frontex working arrangement, with the formal objectives of countering irregular migration as well as improving cooperation on border management and cross-border crime (Frontex, 2012). The agreement mentions the possibility of joint return operations on a case-by-case basis. In 2015, the EU and Nigeria shifted their focus exclusively to human mobility with the signing of the

'Common Agenda on Migration and Mobility'. Yet neither of these frameworks contains binding provisions on return and readmission. Consequently, in March 2016, the EU and Nigeria formally launched negotiations for an EU-Nigeria Readmission Agreement (European Union, 2016). These talks, which have been interrupted several times and have gone through more than a dozen negotiation rounds (Ike et al., 2023), remain inconclusive at the time of writing.

Cooperation between the EU and Nigeria on return and readmission is shaped by a fundamental asymmetry of interests. From the EU's perspective, Nigeria remains a high-priority partner for a readmission agreement, as only a small proportion of Nigerians arriving in Europe are granted protection. Conversely, for Nigeria, return migration does not feature prominently in domestic political or public discourse and is often seen as contrary to national interests. Concerns include the potential disruption of remittance flows from the Nigerian diaspora and the political costs associated with large-scale deportations (NG1). As a result, the negotiations lack meaningful incentives for the Nigerian government to commit to a binding framework for returning its nationals or third-country nationals. In an effort to address this imbalance, the EU has sought to frame the talks within the context of a broader political partnership, signalling a willingness to engage across multiple policy domains—including development cooperation, security, visa facilitation, trade, agriculture, investment, environmental cooperation, and education—in pursuit of a tailored agreement (European Commission, 2022). The wide scope of this negotiation agenda, combined with the involvement of numerous institutional actors on both sides (NG1, NG3), suggests that the ongoing—and thus far inconclusive—negotiations between the EU and Nigeria more closely resemble a whole-of-governance approach rather than a narrowly sectoral one.

Officially, the negotiation process is often framed by the EU as a consensual 'dialogue', one that should be pursued and deepened. While this framing suggests a symmetry among negotiation partners as well as openness and flexibility in negotiations, there are nevertheless clear limits embedded within any prospective EU-Nigeria Readmission Agreement, as such an agreement could only deviate to a limited degree from other EU Readmission Agreements. EURAs typically also provide for the possibility of forced returns—an issue viewed as highly contentious by Nigerian counterparts (NG1, NG2, NG5). Moreover, the stakes for the Nigerian government in these negotiations are considerable, as any agreement would apply to all EU member states and thus potentially affect a large number of individuals who will be returned to Nigeria. The 'dialogue' is therefore more open in peripheral areas of negotiation than in the core issue of return and readmission. Therefore, it appears more accurate to characterise the process as a—thus far failed—attempt to impose *conditionality* on concluding a return and readmission framework – qualifying these negotiations as a case of *Conditional Whole-of-Governance Approach*.

That said, negotiations have also addressed more technical issues, including possible forms of economic compensation for returns (NG1; NG2). However, the positions and preferences of both sides have diverged significantly on a range of issues, for example, regarding channels and modes of communication, the extent of information-sharing, and perceptions regarding an appropriate financial remuneration for returnees (NG2). In addition, negotiations that extend over such a long period and involve high stakes are inevitably shaped by shifting political priorities as well as diplomatic delegations. From the EU's perspective, Nigeria has demonstrated limited willingness to compromise and insisted on what are viewed as unrealistic demands (DE4). From Nigeria's perspective, however, the EU has simply not offered enough—for example, in terms of financial compensation or legal pathways—in negotiations that carry very high stakes (NG1; NG2; NG3).

Beyond the asymmetry of interests, the EU-Nigeria negotiation process also reflects a deeper normative conflict surrounding return and readmission. On the EU side, return is framed as a legal obligation rooted in international law (EU1; EU2). In recent years, political contestation over migration within the EU has further heightened the salience of return enforcement and the perceived need to address non-compliance with return obligations. In Nigeria, by contrast, international migration—and return migration in particular—remains largely absent from public and political discourse (DE4; NG3). The Nigerian government's primary responsibility is understood to lie in safeguarding the interests and well-being of its own citizens (NG3; NG5). Against this backdrop, the EU's strong emphasis on return is thus met with scepticism and, at times, irritation by Nigerian counterparts (NG1; NG3; DE4). Moreover, European efforts to deport Nigerian nationals are frequently viewed through the lens of colonial legacies, which further complicates the political acceptability of such measures (NG5). In contrast to readmission agreements with neighbouring countries, where longstanding cooperation and shared practical interests have provided a more stable foundation, the absence of such ties with Nigeria brings normative differences and public sensitivities to the fore.

Overall, given the profound asymmetry of interests and the conflicting normative perspectives on return, it is unsurprising that negotiations over an EU-Nigeria Readmission Agreement have stalled for many years. The fact that overcoming these differences would require not only mutual interest but also the forging of common normative ground—under conditions of particularly high stakes for the Nigerian side—raises serious doubts as to whether such an agreement can ultimately be concluded.

The Migration Partnership between Switzerland and Nigeria of 2011

In January 2003, Swiss and Nigerian authorities signed what was officially labelled an 'Agreement on Immigration Matters between the Swiss Federal Council and the Government of the Federal Republic of Nigeria'. Given the colonial associations of such language, the Nigerian authorities specifically requested that the agreement not be termed a readmission agreement (Schweizer Bundesbehörden, 2003). Nonetheless, the Swiss government considered its substance equivalent to that of a formal readmission agreement (ibid.).

Seven years later, the Swiss-Nigerian relations concerning migration and return reached a low point. In March 2010, a rejected asylum seeker had died shortly prior to a deportation flight from Zurich to Lagos (Swiss State Secretariat for Migration, 2010). Only one month later, the then-head of what is now the Swiss State Secretariat for Migration publicly claimed that most Nigerian asylum seekers in Switzerland were not coming to Switzerland to seek protection but for the purpose of drug trafficking (Swissinfo, 2010). These events caused a complete breakdown in Swiss-Nigerian cooperation on return and readmission. However, following internal restructuring within the Swiss administration and subsequent diplomatic efforts to repair relations, both countries signed a 'Memorandum of Understanding between the Government of the Swiss Confederation and the Government of the Federal Republic of Nigeria on the Establishment of a Migration Partnership' in 2011. Although the 'Migration Partnership' is legally non-binding, it explicitly addresses the process of return and readmission, as well as financial and social support for returnees.

Intergovernmental cooperation between Switzerland and Nigeria on the Migration Partnership has been strongly shaped by Switzerland's commitment to a whole-of-governance approach. The breakdown of Swiss-Nigerian cooperation on return and readmission coincided with an internal reorganization of Switzerland's international cooperation on migration. For many years, the Ministry of Foreign Affairs led this work, with migration playing only a minor role. From 2011 onward, however,

the Swiss State Secretariat assumed a stronger role, and horizontal coordination across departments was significantly enhanced (CH2). This shift was also supported by the creation of a Special Ambassador for International Cooperation on Migration in 2009. Against the backdrop of stagnation in international diplomatic efforts on migration, Swiss authorities could engage in repair work not only based on their well-established personal relations but also on a horizontally integrated administrative structure. The restructuring not only led to greater engagement across different branches of the Swiss government but also prompted Swiss negotiators to request an equally broad delegation from the Nigerian side (ibid.). The Nigerian government, which typically involves a wide range of authorities in international cooperation (CH4; NG3), responded accordingly.

The negotiation process between Switzerland and Nigeria was marked by a high degree of co-determination and a consensual negotiation style (CH2; CH4; NG2). Thus, the negotiations qualify as a case of *Consensual Whole-of-Governance Approach*. While the Swiss side prepared the initial draft of the memorandum on which the Migration Partnership is based, the Nigerian Foreign Ministry subsequently convened all key stakeholders to review each section of the draft and develop a collective position, which was then communicated back to the Swiss counterparts (NG2; CH4). Both sides were able to articulate their respective interests and demands through this process. The cooperation extended beyond return and readmission, encompassing joint initiatives such as Nigerian police officers accompanying Swiss police in Swiss cities and collaborative projects with major Swiss enterprises (CH2).

A central aim of the partnership was to foster stable and enduring personal relationships. To this end, both parties agreed to hold in-person meetings every six months, alternating between Switzerland and Nigeria (CH2). These close working relationships contributed to the unexpectedly swift conclusion of the readmission component of the agreement—despite the prior diplomatic tensions stemming from the deportation-related death and the controversial statements by the former head of the Swiss State Secretariat for Migration. One key reason for this outcome was that the stakes were perceived to be relatively low for Nigeria, as the number of potential returnees was limited (NG1). Furthermore, the Swiss authorities reassured their Nigerian counterparts that the number of forced returns would remain minimal (CH2), with an emphasis instead placed on voluntary returns and relatively generous financial support for returnees.

The Swiss-Nigerian partnership demonstrates how intra-governmental dynamics—such as Switzerland's shift to a more horizontally coordinated governance structure—can influence intergovernmental cooperation. It also highlights the increasing challenge, in a globalized media environment, of addressing domestic audiences without repercussions in bilateral relations—an issue that has only intensified in the age of social media. Finally, the case underscores the value of building long-standing personal relationships, which in this instance proved more consequential than the legal bindingness of the agreement itself. Indeed, both Swiss and Nigerian officials view the cooperation on return and readmission as largely successful, despite its foundation in a non-binding memorandum.

Case study insights and discussion

This section highlights key insights derived from the case studies, presented in a comparative perspective. First, it examines the relationship between the types of IRFs and the various communicative approaches in the organizational properties of return diplomacy. Second, it explores

how inter-governmental cooperation is influenced by intra-governmental dynamics. Third, it investigates the intersection of IRFs and return diplomacy approaches with issues of legitimacy. Finally, it highlights the communicative challenges of return diplomacy, particularly the difficulty of tailoring messages to domestic audiences without triggering unintended repercussions in the partner country.

The theoretical section of this paper identifies the *regulatory* and *organizational* properties of return diplomacy as its two core dimensions and develops a separate analytical framework for each. From an empirical perspective, the issue arises of how these dimensions are connected. More specifically, it is important to assess whether the selection of different types of IRFs tends to align with particular communicative approaches in return diplomacy. While the case studies presented here do not allow for a systematic evaluation—this would require full public access to the content of all IRFs as well as comprehensive case studies of each negotiation—small-n studies can still offer valuable insights. For example, they can help identify instances where the relationship between IRF types and negotiation styles is fully aligned, such as when similar IRFs are combined with divergent communicative approaches. In addition, they can also point to tentative patterns in which certain IRFs are more likely to be associated with specific diplomatic approaches and negotiation styles.

Overall, the findings suggest that although there are affinities between the regulatory properties, i.e. the type of IRF selected and the organizational approach to return diplomacy, the relationship is *non-deterministic*. For example, negotiations over Readmission Agreements often coincide with a sectoral approach, whereas Composite Arrangements tend to require a whole-of-governance strategy. However, the cases of EU–Georgia and Poland–Ukraine illustrate that even when using the same IRF type, negotiation styles can differ significantly. The EU–Georgia negotiations followed a more conditional and predetermined logic, whereas the Polish–Ukrainian process was more co-determined and consensual. Moreover, the combination of IRF type and diplomatic approach is not always straightforward. In the Italian case, for instance, memoranda of understanding—typically involving issue-linkages—are concluded at a technical level within the Border Police as the main coordinating actor, and with limited involvement from political leadership and inputs from other branches of government.

The strategic decision to prioritize specific types of legal frameworks—such as Readmission Agreements or Composite Arrangements—can necessitate a reconfiguration of intra-governmental cooperation structures. These domestic structures, in turn, not only shape the dynamics of international negotiations but can also influence institutional arrangements in partner countries. The case of Switzerland, and its negotiations with Nigeria over a Migration Partnership, illustrates this dynamic particularly well. In Switzerland, the shift from narrow, legally binding Readmission Agreements to broader, non-binding Migration Partnerships was preceded by a transformation of its administrative architecture. The adoption of a whole-of-government approach was a prerequisite for advancing Swiss return diplomacy and for extending its geographic scope beyond Europe. The Migration Partnership with Nigeria stands out as a key example. Thereby, the Swiss delegation explicitly insisted on engaging with multiple departments on the Nigerian side, prompting broader institutional involvement from their counterparts. As this case shows, the structure of intra-governmental coordination in one country can actively shape that of the other country.

As the case studies presented in this working paper show, return diplomacy is shaped not only by states' interests but also by the normative convictions of both parties. From a theoretical perspective, the perceived fairness of return and readmission negotiations hinges on what has been termed *input*

legitimacy, which refers to the inclusion of relevant actors in the negotiation process and their ability to influence outcomes (Torres et al., 2024). Drawing on the literature on international governance, it can be assumed that organizational properties—particularly the adoption of a whole-of-government approach—enhance the perceived legitimacy of cooperation frameworks (Lavenex & Križić, 2022). This approach can lend legitimacy as it ensures the involvement and close coordination of multiple stakeholders, in contrast to organizational forms that lack inter-departmental coherence. Intra-governmental coordination ensures that the substantive priorities of different departments are represented in the arrangement, while a flexible intergovernmental negotiation style enables process-oriented governance and the adaptive implementation of joint agreements. However, such coordination can be resource-intensive, as aligning efforts across governmental actors may demand significant time and administrative investment. As a result, the effectiveness of a whole-of-government approach is less likely to be realized in the short term and more likely to yield benefits over the medium to long term.

The case studies, however, add nuance to assumptions about the legitimacy and effectiveness of communicative approaches in return diplomacy. The Swiss–Nigerian negotiations suggest that a more consensual and co-determined negotiation style, combined with an integrated government structure characteristic of a Whole-of-Governance Dialogue, can enhance the perceived fairness of cooperation. This effect is particularly evident because such an approach increases input legitimacy by involving a broader range of actors in the negotiation process (see de Torres et al. 2024). In contrast, the Polish–Ukrainian negotiations demonstrate that wider intra-governmental involvement can also generate frictions, and that perceived legitimacy may derive instead from long-standing, trusted forms of Sector Dialogue. Finally, the EU–Georgian negotiations indicate that even a highly predetermined and conditional approach can be perceived as fair by both parties. This is particularly the case when strong power asymmetries are present and one side has compelling incentives to pursue closer cooperation, as with Georgia in its role as an EU candidate country.

Negotiations over return are shaped not only by national interests and shared histories but also by divergent discourses on return and readmission (Leerkes et al., 2024; Majidi et al., 2024). As the empirical analysis shows, these differences reflect not just contrasting perspectives but also varying national priorities. In many European countries, return is a high-ranking policy objective, while in states like Nigeria, it remains a peripheral issue (NG2; NG5). The early phase of the Swiss–Nigerian Migration Partnership illustrates the sensitivity of the issue when return becomes politicized in non-European contexts. Following the tragic death of a Nigerian national during deportation—exacerbated by insensitive remarks from the then-head of the Swiss State Secretariat for Migration—cooperation broke down. Return procedures only resumed after extensive diplomatic repair work, aided by trusted pre-existing bilateral ties.

This case highlights not only the political sensitivity of return diplomacy but also the growing communicative challenges posed by global and social media. A further example is the September 2024 announcement of a Migration Partnership between Germany and Kenya. In the German press (Tagesspiegel, 2024), the agreement was framed as part of efforts to reduce immigration, reinforcing former Chancellor Olaf Scholz’s promise to increase the return of rejected asylum seekers (Der Spiegel, 2023). Kenyan President William Ruto, by contrast, framed the deal as a labour agreement, highlighting the opportunity for 250,000 young Kenyans to work in Europe’s largest economy (Kenyans, 2024). Both governments later had to revise their messaging. This example underscores two key insights that also emerge across the case studies. First, the same IRF—especially those involving issue-linkages—can be

interpreted and framed in radically different ways: European governments may emphasize return, while their non-European counterparts highlight mobility or labour cooperation. Second, in an era of transnational media and digital communication, messaging can no longer be contained within national boundaries. Governments face a fundamental dilemma: while they seek to demonstrate policy success to domestic audiences, their communications are instantly exposed to international scrutiny, making controlled, audience-specific framing increasingly untenable.

Conclusions

This working paper offers a conceptual and empirical investigation of the evolving landscape of extra-European return diplomacy, which has increasingly taken on a global dimension. It introduces an analytical framework to identify the core features of return diplomacy and applies this framework to a set of case studies. The framework distinguishes between two key dimensions of return diplomacy: regulatory properties (the legal dimension) and organizational properties (the communicative dimension). This distinction rests on the insight that return governance is shaped not only by the legal frameworks produced through international cooperation on return and readmission, but also by the modes of communication within and between governments. Accordingly, the paper develops a typology of IRFs based on their regulatory characteristics and outlines different diplomatic approaches grounded in intra- and inter-governmental cooperation. The empirical analysis, drawing on six country case studies, explores how these two dimensions interact in practice and offers reflections on the patterns and variation in return diplomacy.

While the empirical analysis highlights the global reach of extra-European return diplomacy, it also reveals significant variation in the degree of international engagement among EU+ states. On one end of the spectrum, countries like Italy have, since the 1990s, established a dense international network focused on return and readmission, primarily through informal frameworks. On the other end, states such as Poland have concluded only a small number of formal agreements, most of them within their immediate neighbourhood. Part of this variation may be attributed to differing migration histories—as some European states have only recently transitioned from countries of emigration to countries of immigration. However, the limited international engagement of certain states—particularly those known for restrictive asylum policies—suggests that domestic policy preferences do not necessarily translate into active diplomatic efforts on return, even when goals align. While much scholarly attention has focused on divergences in national asylum policies, this analysis indicates that variation in international engagement may be even more pronounced.

Upcoming research in the FAiR project will systematically examine the conditions that contribute to the success or failure of return diplomacy, including the role of public discourse in both negotiating states. Nonetheless, the present empirical analysis already reveals important insights, for example, regarding the underlying conditions of return diplomacy. As one Italian state representative aptly remarked: ‘No memoranda or agreement is negotiated out of thin air’ (IT1). Return diplomacy is shaped not only by political will and negotiation strategies, but also by long-standing political, historical, and economic ties—some of which extend back decades or centuries.

Yet, the case studies also shed light on a previously underexplored dimension of return diplomacy: the central role of intra-governmental coordination in enabling effective inter-governmental cooperation. This is especially evident when EU+ states engage in negotiations beyond their immediate geographic

neighbourhood, where fewer shared norms and interests exist. In such contexts, governments often seek to broaden the negotiation agenda by linking otherwise unrelated policy areas. However, meaningful issue-linkages require a well-functioning internal coordination structure. States aiming to strengthen international cooperation on migration are therefore well advised not only to look outward, but also inward—to ensure that interdepartmental alignment supports external diplomatic efforts.

In sum, the empirical case studies underscore the complexity and fragility of extra-European return diplomacy. They show that sustainable cooperation cannot be built on loud announcements or a *carrot and stick* approach, but requires attentive listening, mutual understanding, and strong personal ties. Rather than scaling up return efforts through ever more assertive rhetoric, governments would do better to invest in the quieter work of relationship-building and institutional trust. In return diplomacy, it is often not those who speak the loudest, but those who listen most carefully, who make progress—typically away from the spotlight.

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Annex

Overview expert interviews

The list below lists the experts interviewed, structured according to state or organization, indicating the position of the interviewee as well as the date, duration, format, and place of the interview plus the institution of the interviewer.

<i>Interview</i>	<i>State/institution</i>	<i>Department/expertise</i>	<i>Date</i>	<i>Duration</i>	<i>Format</i>	<i>Interviewer</i>
DE1	Germany	Federal Ministry of the Interior and Community	September 2024	Ca. 60 min	Face-to-face in Berlin	UNIGE
DE2	Germany	Federal Employment Agency	September 2024	Ca. 60 min	Face-to-face in Berlin	UNIGE
DE3	Germany	German Embassy Georgia	October 2024	Ca. 60 min	Face-to-face in Tbilisi	ICMPD
DE4	Germany	German Embassy Nigeria	July 2024	Ca. 60 min	Face-to-face in Abuja	ICMPD
IT1	Italy	Central Directorate of Immigration and Border Police	October 2024	Ca. 60 min	Virtual	UNMIL
PL1	Poland	Migration expert	November 2024	Ca. 60 min	Face-to-face in Warsaw	INP PAN
PL2	Poland	Office for Foreigners	January 2025	Ca. 60 min	Face-to-face in Warsaw	INP PAN
PL3	Poland	Ministry of Interior and Administration	March 2025	Ca. 45 min	Face-to-face in Warsaw	INP PAN
PL4	Poland	Border Guard	May 2025	-	Written answers	INP PAN
CH1	Switzerland	State Secretariat for Migration	October 2024	Ca. 60 min	Face-to-face in Lausanne	UNIGE
CH2	Switzerland	State Secretariat for Migration / Ministry of Foreign Affairs	October 2024	Ca. 90 min	Face-to-face in Bern	UNIGE
CH3	Switzerland	State Secretariat for Migration	July 2025	Ca. 60 min	Face-to-face in Bern	UNIGE
CH4	Switzerland	State Secretariat for Migration	July 2024	Ca. 60 min	Face-to-face in Abuja	ICMPD
GE1	Georgia	Governmental representative	September 2024	Ca. 60 min	Face-to-face in Tbilisi	ICMPD
GE2	Georgia	Governmental representative	September 2024	Ca. 60 min	Face-to-face in Tbilisi	ICMPD
GE3	Georgia	Governmental representative	September 2024	Ca. 60 min	Face-to-face in Tbilisi	ICMPD
GE4	Georgia	Ministry of Health, Labor and Social Affairs	September 2024	Ca. 60 min	Face-to-face in Tbilisi	ICMPD

NG1	Nigeria	ICMPD Nigeria	July 2024	Ca. 60 min	Face-to-face in Abuja	ICMPD
NG2	Nigeria	Ministry of Foreign Affairs	July 2024	Ca. 60 min	Face-to-face in Abuja	ICMPD
NG3	Nigeria	Ministry of Labor	July 2024	Ca. 60 min	Face-to-face in Abuja	ICMPD
NG4	Nigeria	Civil Society Network on Migration and Development	July 2024	Ca. 60 min	Face-to-face in Abuja	ICMPD
NG5	Nigeria	Migration expert	July 2024	Ca. 60 min	Face-to-face in Abuja	ICMPD
IOM1	IOM	IOM HQ	November 2024	Ca. 60 min	Virtual	UNIGE
IOM2	IOM	IOM HQ	December 2024	Ca. 60 min	Face-to-face in Geneva	UNIGE
IOM3	IOM	IOM Georgia	September 2024	Ca. 60 min	Face-to-face in Tbilisi	ICMPD
IOM4	IOM	IOM Georgia	September 2024	Ca. 60 min	Face-to-face in Tbilisi	ICMPD
IOM5	IOM	IOM Georgia	September 2024	Ca. 60 min	Face-to-face in Tbilisi	ICMPD
UNHCR1	UNHCR	UNHCR Switzerland	October 2024	Ca. 60 min	Face-to-face in Bern	UNIGE
UNHCR2	UNHCR	UNHCR HQ	November 2024	Ca. 60 min	Face-to-face in Geneva	UNIGE
UNHCR3	UNHCR	UNHCR HQ	November 2024	Ca. 60 min	Face-to-face in Geneva	UNIGE
UNHCR4	UNHCR	UNHCR HQ	November 2024	Ca. 60 min	Face-to-face in Geneva	UNIGE
UNHCR5	UNHCR	UNHCR HQ	November 2024	Ca. 60 min	Face-to-face in Geneva	UNIGE
UNHCR6	UNHCR	UNHCR HQ	November 2024	Ca. 60 min	Face-to-face in Geneva	UNIGE
EU1	EU	EU Delegation in Georgia	September 2024	Ca. 50 min	Face-to-face in Tbilisi	ICMPD
EU2	EU	DG Home	November 2024	Ca. 60 min	Virtual	ICMPD
EU3	EU	European Commission	November 2024	Ca. 60 min	Virtual	ICMPD