

Balancing Control and Protection: Migration Governance in Indonesia and China

Fransiska A. Susanto¹, Rika Kurniaty², Patricia Audrey³, Yasniar Rachmawati Madjid⁴, Ikaningtyas⁵, Fines Fatimah⁶

^{1,2,3,4,5} Faculty of Law, Universitas Brawijaya, Malang, Indonesia

⁶ University of Debrecen, Hungary

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Author E-mail

¹Correspondence:

fransiska.s@ub.ac.id

²rika_kurniaty@ub.ac.id

³patricia@ub.ac.id

⁴yasniar@ub.ac.id

⁵ninktyas@ub.ac.id

⁶finesfatimah@mailbox.unideb.hu

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Abstract

Migration governance in Asia is rapidly evolving in response to the dynamic socio-economic and geopolitical conditions. Indonesia and Peoples' Republic of China (China), as two prominent regional actors, provide instructive comparative models in term of their differing political systems and migration profiles. This article performs a comparative legal and policy analysis of migration governance in Indonesia and China, examining how each country regulates human mobility through dynamic legal and institutional frameworks. The analysis highlights Indonesia's shift toward a protection-oriented regime, particularly following the enactment of Law No. 18 of 2017 concerning the Protection of Indonesian Migrant Workers, which prioritising safe migration, gender-sensitive safeguards, and reintegration. In contrast, China adopts a centralised, development-focused approach, grounded in the Exit and Entry Administration Law of 2013 and the creation of the National Immigration Administration in 2018. The study utilises a normative and doctrinal comparative methodology, which reviews domestic legislation, policy documents, and international standards toward protection of Migrant. By contextualising both countries within broader Asian migration trends, especially ASEAN frameworks and the Belt and Road Initiative, the analysis contends that Indonesia and China are shaping state-led, rights-sensitive models of migration governance in Asia. This article lies in its identification of an emerging Asian model of migration governance in which decentralised protection and centralised administration, though institutionally different, converge in combining state control with increasing sensitivity to migrant rights.

1. INTRODUCTION

Migration governance encompasses a set of legislative and policy measures governing actions undertaken by both public and private entities.¹ It has become a key issue in current international and regional law. States across Asia have developed various legal and institutional responses to cross-

¹ Patrycja Matusz-Protasiewicz, "Cities Towards Migrants. Case Study of Local Integration Policies of Gdańsk and Wrocław," *Polish Political Science Review* 2, no. 8 (2020): 22.

border mobility, labour migration, and demographic changes.² Within this context, Indonesia and China are two particularly important states. Indonesia is one of the world's largest labour-sending countries, with millions working overseas, mainly in Asia and the Middle East.³ Meanwhile, China has shifted from a primarily emigration state to one managing large internal migration and growing inflows of foreign workers.⁴ Despite their different migration profiles and political systems, both countries have comprehensive regulatory frameworks that demonstrate a commitment to state-managed mobility.

The legal and policy frameworks in both countries have changed significantly in the past decade. In Indonesia, Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers (Law No. 18 of 2017) shifted the regulation from recruitment to protection, rights, and accountability.⁵ Subsequent regulations and a larger role for The Indonesian Migrant Workers Protection Agency or *Badan Perlindungan Pekerja Migran Indonesia* (BP2MI) further cemented this focus on protection. In China, the Exit and Entry Administration Law (2013) and the establishment of the National Immigration Administration in 2018 unified migration governance.⁶ These moves align with China's restructuring to improve coordination, modernise its economy, and enhance social stability.⁷

Recent regional trends have increased the complexity of migration governance. Despite the labour migration policy developed by Southeast Asian countries,⁸ the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017) has strengthened Southeast Asia's framework on labour mobility, though its terms are non-legally binding.⁹ The document recognises the sovereignty of ASEAN Member States in formulating migration policies concerning migrant workers. It also emphasises the responsibilities of all stakeholders throughout the migration process to comply with the laws, regulations, and policies of both sending and receiving

² United Nations Economic and Social Commission for Asia and the Pacific (UNESCAP), *Asia-Pacific Migration Report 2022: Transforming Challenges into Opportunities* (Bangkok: UNESCAP, 2022), 1-2.

³ Dina Eka Putri and Mega Nisfa Makhroja, "Trend Analysis of Indonesian Migrant Worker Profiles: Redirecting Strategy on Indonesia's Demographic Bonus." *Indonesian Journal of Peace and Security Studies* (IJPSS) 5, no. 1 (2023):60.

⁴ Tabitha Speelman, "Establishing the National Immigration Administration: Change and Continuity in China's Immigration Reforms," *China Perspectives* 2020, no. 2020/4 (2020): 7.

⁵ Law of the Republic of Indonesia No. 18 of 2017 on the Protection of Indonesia Migrant Workers, explanatory provisions.

⁶ Regulations of the People's Republic of China on Administration of the Entry and Exit of Foreigners 2013, Art. 1.

⁷ Ziyu Yang, "Overall Thinking of China's Eighth Institutional Reform under the Perspective of System Theory", *Open Journal of Social Sciences* 7, (2019): 251-252.

⁸ Mochammad Kevin Romadhona, Sri Endah Kinansih, Rachmad Dimas Oktafenanda, "Labour Migration Policy in ASEAN State," *International Law Discourse in Southeast Asia* 4, no. 1 (2025): 82-83.

⁹ Agusmidah et al, "ASEAN's Migrant Rights Policy Dilemma and Deadlock on Migrant Worker Protection," *Journal of Human Rights, Culture and Legal System* 5, no. 3 (2025): 719.

states.¹⁰ Furthermore, it stipulates that ASEAN Member States, in accordance with their respective national laws, regulations, and policies, are committed to a collaboration to enhance public awareness and disseminate accurate information regarding labour migration.¹¹ Another trend is that China's Belt and Road Initiative (BRI), adopted by the Chinese Government in March 2015,¹² has driven new regional mobility and cross-border labour. The BRI that connectivity projects with other countries will create demand and job opportunities and enhance people-to-people and cultural exchanges.¹³ These trends show the growing interplay among national laws, regional cooperation, and international standards in shaping migration governance in Asia.¹⁴¹⁵

From a comparative perspective, this article examines the conceptualisation and operation of migration governance made by these two states through law and policy. Employing a side-by-side analysis of Indonesia and China, this article investigates how their legal and institutional frameworks for migration differ and what these differences and similarities reveal about the relationship between state control, development objectives, and the protection of migrant rights in contemporary Asia. By specifically comparing the two countries, the article seeks to contribute to the under-explored area of comparative Asian migration law, addressing gaps left by the predominance of Western-centric international migration studies.

The argument presented in this article is that Indonesia and China, despite their distinct contexts, are developing state-led models of migration governance that increasingly converge. Although both prioritise economic and administrative rationales and gradually incorporate rights protection into their frameworks, Indonesia's reforms signal a shift toward aligning national law with international standards as Indonesia adopts democracy. Meanwhile, China's evolving administrative approach reinforces state-led development as China adopts the socialism concept. Neither country employs a purely control-based nor entirely protectionist strategy; instead, both illustrate pragmatic integration of mobility management with broader state goals, revealing a convergence in their approaches to migration governance in Asia.

Methodologically, this article adopts a normative comparative legal approach and historical approach that combining doctrinal analysis with policy examination under the focus on Migrants protection. The normative approach draws on domestic legislation, subordinate regulations, policy statements, and international instruments adopted between 2018 and 2025, complemented by secondary literature and institutional reports from the

¹⁰ Association of Southeast Asian Nations (ASEAN), ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers, Preamble.

¹¹ *Ibid.*, para. 49.

¹² Ministry of Foreign Affairs, and Ministry of Commerce of the People's Republic of China, Vision and Actions on Jointly Building Silk Road Economic Belt and 21st Century Maritime Silk Road, issued by the National Development and Reform Commission with State Council authorization, March 2015.

¹³ *Ibid.*, Section I. Introduction

¹⁴ Mi Hong, Li Yuan, and MA Qiyini. *"The Belt and Road" International Migration of Asia* (Routledge, 2021), 1-2.

¹⁵ International Organization for Migration (IOM) and UNESCAP. *Asia and The Pacific: Regional Strategy 2020-2024* (IOM, 2023), 21-22.

International Labour Organization (ILO), the International Organization for Migration (IOM), and the United Nations Economic and Social Commission for Asia and the Pacific (UNESCAP). The historical approach complements this normative analysis by tracing the development of migration governance over time. This approach provides a nuanced understanding of the legal structures, institutions, and governance logics of migration regulation in both countries.

Existing research on Indonesia and China's migration governance has developed in largely parallel scopes. For Indonesia, recent works concentrated on the post-Law No. 18 of 2017 regarding migrant-worker governance, especially the role of bilateral labour agreements in extending (and limiting) protection abroad, and the growing reliance on digitalisation and sub-national initiatives to improve recruitment oversight, gender-responsive protections, and welfare outcomes.¹⁶ For China, several research analysed internal migration governance through the *Hukou* household registration system and its reform trajectories, alongside newer studies of administrative consolidation and border-management capacity following the Exit and Entry Administration Law (2013) and the establishment of the National Immigration Administration (2018), including the regulation of foreign employment, irregular work, and the evolution of policy tools that prioritise administrative coherence and gradual inclusion.¹⁷ A third cluster maps broader East/Southeast Asian mobility dynamics, including ASEAN norm-setting on migrant-worker protection¹⁸ and the Belt and Road's connectivity effects. Yet, these studies typically overlook a doctrinal, side-by-side legal comparison that explains how distinct governance designs (decentralised protection governance versus centralised administrative integration) produce converging "state-led but rights-attentive" regulatory logics. It positions the Indonesia-China comparison as a corrective to the predominance of Western-centric frames in migration-law scholarship and uses a normative, comparative legal methodology. This methodology is to show not simply differences but an emerging convergence toward an Asian, context-specific, rights-sensitive model in which protection is pursued through state managerialism rather than through purely liberal-rights constitutionalism.

¹⁶ See Sri Damayanti, Yudi Ferdiansyah, and Shafira Dita Sasmita, "Mapping Labor Migration Trends Indonesia-Malaysia: Implications for Labor Markets, Remittances, and Bilateral Policies," *Neo Journal of Economy and Social Humanities* 4, no. 2 (2025); Elfia Farida, "Empowering Indonesia Migrant Worker: Human Rights-Based Legal Protection Through Village Regulations and Bilateral Agreements," *Journal of Southeast Asian Human Rights* 9, no. 1 (2025); and Anis Hidayah, "Bilateral Labour Agreements and Migrant Protection in Indonesia," *Asian Journal of International Law* 13, no. 1 (2023).

¹⁷ See Chen Lu, et al, "How Urban Welfare Affects the Hukou Selection of Rural Migrants That Belong to Dual-Hukou Families in China," *Comparative Migration Studies* 13, no. 1 (2025); Zhihang Ruan, "Dualist Land Regime, the Hukou System and the Welfare of Migrant Workers in Chinese Cities," *The China Quarterly* 260, no. 1 (2024); and Anne-Christine Trémon, Cliff Chen, and Na Liu, "Citizenization or Talent Recruitment? The Development of China's Points-Based Hukou Channels," *Journal of Contemporary China* 34, no. 154 (2024).

¹⁸ See Agusmidah et al, *loc.cit* and Romadhona, Kinansih, and Oktafenanda, *loc.cit*.

The contribution of this article covers two aspects. First, it expands comparative legal enquiry into migration governance beyond Western jurisdictions, situating Asian legal experiences within the broader discourse on the international regulation of mobility. Second, it identifies the potential emergence of an “Asian rights-sensitive model” of migration governance, in which state control and rights protection coexist within context-specific frameworks of economic development.

The first part of the paper will comparatively describe the historical evolution of migration in Indonesia and China, tracing how socio-economic transformation and state ideology have distinctly shaped each country’s governance approaches. The second part will analyse, in a comparative framework, the legal and institutional structures currently in place, focusing on statutory design and inter-agency coordination in both states. The third part will examine parallel contemporary migration patterns and policy responses, including gendered migration and digitalisation. The fourth part will present a direct comparative discussion of the two systems, highlighting similarities, divergences, and regional implications. Finally, the conclusion identifies possible avenues for regional cooperation and the further development of a rights-sensitive governance framework in Asia, drawing on comparative findings on governance frameworks.

2. RESULT AND ANALYSIS

2.1. Historical Evolution of Migration Pattern

The historical trajectories of migration in Indonesia and China demonstrate how economic transformation, state ideology, and demographic policy have distinctly shaped each state's approach to migration governance. While both countries share histories of population mobility tied to labour, trade, and regional integration, their divergent political and economic systems have led to contrasting regulatory frameworks. This section outlines how principal legal and institutional milestones, from the mid-twentieth century to the contemporary times, have directly contributed to these distinct migration management models.

2.1.1. Indonesia

Migration in Indonesia has undergone significant evolution, marked notably by the Transmigration Programme initiated during the Suharto era in the late 1960s. This state-led initiative aimed to alleviate overpopulation and poverty in Java by relocating people to the outer islands. Between 1979 and 1988, about two million people moved under this programme, making it one of the largest of its kind worldwide.¹⁹ While intended to promote economic development, the programme frequently faced criticism for its ecological and social impact on indigenous communities, leading to tensions and conflicts.

¹⁹ Tushar Bharati, Adnan Fakir, and Wina Yoman, “Internal migration and labour market outcomes in Indonesia,” *Economic Development and Cultural Change* 72, no. 2 (2024): 1001.

Beyond internal migration, Indonesia has historically been a significant source of labour migration, particularly to Malaysia and the Gulf States.²⁰ The economic opportunities abroad, coupled with high demand for low-wage labour, prompted many Indonesians to seek employment overseas.²¹ This trend intensified in the late 20th century, particularly during Indonesia's economic crisis, which prompted even more individuals to seek better opportunities abroad.²² Labour migration from Indonesia has continued to grow, with millions of workers—known as Indonesian Workers or *Tenaga Kerja Indonesia* (TKI)—employed in various sectors, particularly domestic work and construction, across Southeast Asia and the Middle East.²³ However, prioritising remittance generation and labour export efficiency over protection, resulted in widespread reports of abuse and exploitation, particularly among female domestic workers.²⁴

Indonesia's migration governance framework has evolved through several legislative phases. Earlier regulation was centred on Law No. 39 of 2004 concerning the Placement and Protection of Indonesian Workers Abroad, which was later replaced by Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers. The 2017 law redefined the state's responsibility from a predominantly placement-based approach toward a more comprehensive protection regime covering pre-departure, placement, and post-return reintegration.²⁵ The law also decentralises certain functions to provincial and local governments, reflecting Indonesia's broader trend toward administrative decentralisation following the *reform* era.²⁶ Complementary measures, including bilateral labour agreements and the establishment of BP2MI, have further institutionalised the state's commitment to safeguarding the rights of migrant workers abroad.²⁷ This framework has since been adjusted through the Job Creation reform process, and more recent implementing regulations refer to Law No. 18 of 2017 as amended by Law No. 6 of 2023.²⁸

²⁰ Indonesia Business Council. *Expansion of Indonesia's Overseas Worker (PMI) Industry* (IBC, 2025), 15.

²¹ Reddy Anggara, Slamet Mulyana, Gati Gayatri, and Hanny Hafiar, "Understanding the Motivations of being Indonesia Migrant Workers," *Cogent Social Sciences* 10, no. 1 (2024): 2.

²² Olga K. Calendar, "On the Indonesian Labour Migration to Malaysia," *Southeast Asia Actual Problems of Development*, 56, no. 3 (2022): 103.

²³ Suyanto, "Job Shift of The Indonesian International Return Migrant in Central Java Province," *E3S Web of Conferences* (2020): 2. See also Sri Damayanti, Yudi Ferdiansyah, and Shafira Dita Sasmita, *op.cit.*, 226.

²⁴ Amnesty International. *Exploited and Abandoned: Migrant Workers in Indonesia's Recruitment System* (Amnesty International, 2020): 2.

²⁵ IOM, *Migration Governance Indicators: Indonesia* (Geneva: IOM, 2024): 12.

²⁶ Dennis Shoesmith, Nathan Franklin, and Rachmat Hidayat, "Decentralised Governance in Indonesia's Disadvantaged Regions: A Critique of the Underperforming Model of Local Governance in Eastern Indonesia," *Journal of Current Southeast Asian Affairs* 39, no. 3 (2020): 360.

²⁷ BP2MI, *Laporan Pelaksanaan Tugas KP2MI Tahun 2024* (Jakarta: BP2MI, 2024): 5.

²⁸ Under the Job Creation Law, Article 89A, introduced through the Job Creation reform, requires the meaning of SIP3MI in Law No. 18 of 2017 to be aligned with the new

Indonesia's migration governance framework was further operationalised in 2025 through several implementing regulations and inter-agency coordination measures. BP2MI regulation create the lincensing process for companies that place migrant rules about business permits, branch officers, supervision, reporting and how to handle security deposits. Ministry Regulation / BP2MI No. 23 of 2025 also made it easier for migrant worker to file complaints and get help with problems they had before departure, during employment, and after return. This regulatory regulatory developments were complemented institutionally by the 14 July 2025 MoU between the Ministry of the Protection of Indonesian Migrant Workers/BP2MI and the Ministry of Manpower on the synergy of tasks and functions in protecting Indonesian migrant workers, indicating continued efforts to reduce fragmentation and improve coordination in the post-restructuring framework.

Despite these advances, issues hampering implementation persist, particularly concerning recruitment oversight, irregular migration, and access to legal remedies in destination countries.²⁹ Thus, Indonesia's experience thus demonstrates the evolution of migration governance from state-managed population distribution to a rights-sensitive yet still economically motivated regulatory framework.

2.1.2. China

China's migration trends have been heavily influenced by its economic reforms initiated in the late 20th century. The *Hukou* system, introduced in the 1950s, regulated internal migration by restricting the movement of individuals between rural and urban areas.³⁰ Originally designed to support socialist planning and rural-urban segregation, the *Hukou* system became one of the most enduring features of Chinese governance.³¹ However, with the economic liberalization policies that began in the late 1970s, there was a massive wave of internal migration, as millions sought opportunities in burgeoning urban centers.³² This movement significantly altered the socio-economic landscape of China, with rural residents flocking to cities for better livelihoods.

In addition to internal migration, labour migration emerged as a significant trend for Chinese nationals seeking work abroad, particularly in regions such as Southeast Asia and the United States.³³ China has historically sent a large number of migrant workers to places like Malaysia and also accommodates internal migrants from neighboring countries seeking

perizinan berusaha regime. This shown that the omnibus reform did not displace the protective orientation of Law No. 18 of 2017, but modified parts of its administrative and licensing structure to conform to wider regulatory simplification.

²⁹ Elfira Farida, *op.cit.*,126.

³⁰ Kam Wing Chan and Li Zhang, "The Hukou System and Rural-Urban Migration in China: Processes and Changes," *The China Quarterly* 160, (1999): 821.

³¹ Fei-Ling Wang, *Organizing through Division and Exclusion: China's Hukou System* (Stanford: Stanford University Press, 2005): 1.

³² Randall Hansen. *Where We Live III: War, Work, and Want: How the OPEC Oil Crisis Caused Mass Migration and Revolution* (Exford Academic, 2023), 251-253.

³³ Eric Fong and Kumiko Shibuya, "Migration Patterns in East and Southeast Asia: Causes and Consequences," *Annual Review of Sociology* 46, no. 1 (2020): 512.

work.³⁴ The onset of economic reforms in the late 1970s and the introduction of the Open Door Policy, internal migration surged as millions of rural workers moved to coastal cities and special economic zones in search of employment.³⁵ Although these movements were initially informal, subsequent policy adjustments gradually legalized and regulated temporary migration through permits and residence cards. The resulting “floating population” (*liudong renkou*) became a defining feature of China’s industrial growth, while also exposing migrants to disparities in welfare access and labour rights.³⁶

China’s approach to international migration has similarly evolved. Historically a country of emigration, China began to experience increasing inflows of foreign workers, students, and investors in the 1990s and 2000s.³⁷ The enactment of the Exit and Entry Administration Law (2013) consolidated previous statutes and introduced a unified system for the regulation of both Chinese citizens and foreign nationals.³⁸ In 2018, the establishment of the National Immigration Administration (NIA) under the Ministry of Public Security further integrated migration control, visa policy, and border management within a single institutional framework.³⁹ These reforms indicate a shift toward a more coordinated, administratively coherent approach to migration governance, consistent with the broader modernization of China’s legal-administrative apparatus.⁴⁰

Internal migration remains a central concern for Chinese policymakers, particularly as the government seeks to balance urbanization with social equity. Recent reforms, such as the 2022 Opinions on Further Promoting Urbanization Reform, aim to relax *Hukou* restrictions in small and medium-sized cities while maintaining selective controls in megacities like Beijing and Shanghai.⁴¹ These measures reflect an incremental rather than revolutionary

³⁴ Pui Kwan Man and Eric Fong, “Momentum of Chinese migration scholarship in East and Southeast Asia,” *Asian Population Studies* 17 (2021): 117-120.

³⁵ Ruan, *op.cit.*, 1027.

³⁶ *Ibid.*, 1026. See also Chris King-Chi Chan and Elaine Sio-Ieng Hui, “Pension Systems and Labour Resistance in Post-Socialist China and Vietnam: A Welfare Regime Analysis,” *Journal of Contemporary Asia* 53, no. 2 (2022): 237.

³⁷ Heidi Østbø, “China’s Rapid Development Has Transformed Its Migration Trends,” migrationpolicy.org, Accessed on 8 August 2025, <https://www.migrationpolicy.org/article/china-development-transformed-migration>. Again, for webpage citations, Authors to please follow this example: “About the IFRC,” International Federation of Red Cross, accessed October 17, 2025, <https://www.ifrc.org/who-we-are/about-ifrc>. Also, why does the link include chatgpt.com? See also Frank N Pieke, “Immigration in China: A Typology and Trends,” *East Asian Policy* 17, no. 01 (2025): 143.

³⁸ Guofu Liu, “Legislation, Impacts and Deficiencies of the Law of Exit and Entry Administration of China 2013,” *International Journal of Public Law and Policy* 4, no. 4 (2014): 382.

³⁹ Tabitha Speelman, “Establishing the National Immigration Administration: Change and Continuity in China’s Immigration Reforms,” *China Perspectives* 2020, no. 2020/4 (2020): 7.

⁴⁰ Franziska Plümmer, “Contested Administrative Capacity in Border Management: China and the Greater Mekong Subregion,” *China Information* 36, no. 3 (2022): 413.

⁴¹ Trémon, Chen, and Liu, *op.cit.*, 633.

approach to reform—one that prioritizes stability and administrative manageability.⁴²

In the context of external migration, China's BRI policy has expanded its engagement with cross-border labour flows.⁴³ The BRI has generated new forms of outward mobility for Chinese workers and professionals, as well as inward mobility through foreign labour associated with infrastructure projects.⁴⁴ Although China has not yet adopted a comprehensive refugee or asylum law, its regulatory framework provides administrative mechanisms for temporary residence, humanitarian relief, and international cooperation, reflecting a managed and policy-oriented approach to migration.⁴⁵

2.2. Legal and Institutional Framework

2.2.1 Indonesia

Indonesia's legal framework regarding migration was constructed under several national laws and international agreements. Legally, the country regulates both domestic and international migration through various policies, including labour migration agreements and frameworks that protect migrant workers from exploitation.⁴⁶ However, Indonesia's lack of formal refugee law and its non-participation in the 1951 Geneva Convention complicate its response to refugee issues. Although the Government of Indonesia has enacted a presidential regulation for handling of refugees in 2016,⁴⁷ its provisions have not significantly changed to the situation of refugees in Indonesia. Consequently, refugees often find themselves in legal limbo, without adequate protections under domestic law.⁴⁸

Indonesia's migration governance framework is primarily based on Law No. 18 of 2017, which replaced Law No. 39 of 2004. The 2017 law expanded the state's responsibility for migrant protection, emphasising not only pre-departure processes but also placement and post-return reintegration.⁴⁹ The law's preamble reflects Indonesia's constitutional commitment to protecting its citizens abroad and to the principles of human dignity enshrined in international law.⁵⁰ Several provisions of Law No. 18 of 2017 were subsequently amended by the Job Creation Law, including Article 89A, which aligns the definition of SIP3MI with new business licensing regulations.

⁴² Plümmer, *op.cit.*, 408.

⁴³ Hong, Yuan, and Oivini, *op.cit.*, 70.

⁴⁴ A. K. M. Ahsan Ullah, "Connectivity and Mobility: The Transformative Impact of BRI on Migration Dynamics in the MENA," *Politics & Policy* 53, no. 3 (2025): 4.

⁴⁵ Lili Song, "China and the International Refugee Protection Regime: Past, Present, and Potentials," *Refugee Survey Quarterly* 37, no. 2 (2018): 140.

⁴⁶ Aqnisyah, Devara Izzatun and Dian Azmawati, "Evaluating the effectiveness of Indonesia-IOM cooperation in the governance of human trafficking and illegal labour migration," *UMYGRACE* 1, no. 3 (2023): 199. See also Karina, K and Maidah Purwanti, "Indonesia's national policy on international migration," *Journal of Law and Border Protection* 3, no. 1 (2021): 118.

⁴⁷ Presidential Regulation No. 125 of 2016 concerning the Treatment of Refugees

⁴⁸ Fransiska A. Susanto, "The UK-Rwanda Migration and Economic Development Partnership Based on International Refugees Law," *Padjadjaran Jurnal Ilmu Hukum* 12, no. 1 (2025): 93.

⁴⁹ IOM, *op.cit.*, 14.

⁵⁰ Constitution of the Republic of Indonesia (1945), Art. 28I.

Presidential Regulation No. 130 of 2024 concerning the Strengthening of Governance for the Placement and Protection of Indonesian Migrant Workers reflects the State's effort to optimise placement and protection as part of guaranteeing the constitutional right to work and to a dignified livelihood. Subsequently, Presidential Regulation No. 165 of 2024 concerning the Ministry of Protection of Indonesian Migrant Workers established a new ministerial structure for migrant worker affairs. BP2MI remains the primary implementing body, responsible for service delivery, training, and documentation.⁵¹ Meanwhile, the Ministry of Manpower retains authority over labour placement and policy coordination, while provincial and local governments contribute to registration and reintegration programmes.⁵² This multi-level governance structure reflects Indonesia's post-Reform decentralisation migration management more participatory and responsive to local needs.⁵³ Further, several ministerial regulations operationalise the 2017 law, including provisions on electronic registration,⁵⁴ skill certification,⁵⁵ and dispute resolution.⁵⁶ More recently, Regulation of the Minister of Protection of Indonesian Migrant Workers/BP2MI No. 23 of 2025 concerning Complaint Services and the Handling of Problems for Prospective Indonesian Migrant Workers or Indonesian Migrant Workers added a more detailed procedural framework for addressing complaints and problems arising before, during, and after employment. Together, these developments indicate that Indonesia's migration governance continues to combine protection-oriented legal commitments with administrative restructuring, regulatory streamlining, and stronger institutional coordination.

A significant innovation is the digitalisation of migration documentation through integrated databases that link recruitment agencies, consular offices, and labour attachés.⁵⁷ These technological reforms align with Indonesia's political commitments under the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017), which encourages member states to enhance transparency and portability of migrant data.⁵⁸

⁵¹ BP2MI, *Annual Report on the Protection of Indonesian Migrant Workers* (Jakarta: BP2MI, 2024): 5.

⁵² Government Regulation of the Republic of Indonesia No. 59 of 2021 on the Implementation of Protection Indonesian Migrant Workers, Art. 3; President Regulation No. 130 of 2024 on Strengthening the Regulation, Placement and Protection of Indonesia Migrant Workers, Art. 2.

⁵³ IOM, *op.cit.*, 45.

⁵⁴ Regulation Minister of Manpower of the Republic of Indonesia No. 9 of 2019 on Procedures for Placement and Protection of Migrant Workers Abroad, Art. 4.

⁵⁵ *Ibid.*, Art. 9.

⁵⁶ Minister of Manpower Regulation of the Republic of Indonesia No. 9 of 2024 on Strengthening The Role Of Employment Agencies, Empowering Indonesian Migrant Workers And Their Families, Guidance For Institutions Involved In The Placement And Protection Of Indonesian Migrant Workers, Community Involvement In Labour Supervision, And Requirements For Business Partners, Art. 3.

⁵⁷ ILO, *Digitalization of Labour Migration Services in ASEAN* (Jakarta: ILO, 2019): 3. See also ASEAN Secretariat, "ASEAN Migration Outlook," (Jakarta: ASEAN, 2022): 96 <https://asean.org/wp-content/uploads/2022/08/ASEAN-Migration-Outlook-Final.pdf>

⁵⁸ ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers, Chapter 5.

Despite this progress, institutional fragmentation remains a recurring challenge. The coexistence of central and local authorities sometimes results in overlapping mandates and inconsistent enforcement, particularly in remote regions.⁵⁹ Moreover, Indonesia's reliance on bilateral labour agreements limits the extraterritorial enforcement of rights protections, as many destination countries have yet to fully integrate these agreements into their domestic frameworks. Nonetheless, Indonesia's evolving legal regime reflects a gradual but clear shift toward a rights-sensitive model of migration governance, consistent with its broader engagement with international labour standards.⁶⁰

2.2.2 China

On the other hand, China's migration governance system is characterised by administrative centralisation and a policy orientation that integrates migration management into national development planning. The foundational statute is the Exit and Entry Administration Law 2013, which replaced earlier legislation from 1985 and 1994.⁶¹ This law provides a unified framework for regulating the movement of both Chinese citizens and foreign nationals, addressing entry, residence, employment, and exit procedures.⁶²

The law is complemented by the Regulations on the Administration of the Employment of Foreigners in China and related implementing rules issued by the Ministry of Human Resources and Social Security and the Ministry of Public Security.⁶³ Together, these instruments define visa categories, work authorisation procedures, and penalties for irregular status.⁶⁴ They also establish the administrative basis for data collection and inter-agency coordination.

Moreover, NIA⁶⁵ establishment marked a significant institutional innovation, centralising migration-related responsibilities that were previously dispersed across multiple agencies. The NIA's activities include facilitating legal migration, ensuring public order, and promoting cooperation with international organisations such as the IOM and the United Nations High Commissioner for Refugees (UNHCR).⁶⁶

⁵⁹ Shoesmith, Franklin, and Hidayat, *op.cit.*, 374.

⁶⁰ UN, "Migration Governance for Sustainable Development in Indonesia National & Sub-National Levels Central Java Safe Migration and Economic Empowerment Training in East Lombok | ©UN Women 2023 55% MIGRATION GOVERNANCE for SUSTAINABLE DEVELOPMENT in INDONESIA" (UN, 2024): 4, https://indonesia.un.org/sites/default/files/2024-01/Migration%20-%20December%20%28EN%29_0.pdf

⁶¹ Law of The People's Republic of China 2013 on the *Exit and Entry Administration*, Art. 93.

⁶² Liu, *op.cit.*, 383.

⁶³ Wenfang Wu and Xuan Luo, "Legal Framework for the Protection of Foreign Employees in China," *Employee Relations: The International Journal* 44, no. 5 (2022): 1144.

⁶⁴ Heidi Østbø Haugen and Bingyu Wang. *Handbook on Migration to China* (Edward Elgar Publishing, 2025, 24.

⁶⁵ "610 Million Exit-Entry Trips Recorded in 2024, Marking a 43.9% YoY Increase," National Immigration Administration, accessed August 15, 2025, <https://en.nia.gov.cn/n147413/c179666/content.html>

⁶⁶ UNHCR, "Fact Sheet : People's Republic of China" (UNHCR, 2020):1-4, <https://webarchive.archive.unhcr.org/+/https://reporting.unhcr.org/sites/default/files/UHCR%20China%20Factsheet%20September%202020.pdf>

China's legal and policy instruments emphasise administrative clarity and procedural regulation rather than rights-based terminology. However, this approach aligns with the country's broader legal modernisation framework, which prioritises predictability, administrative order, and gradual reform. Recent initiatives have sought to simplify residence and work permit procedures, improve visa transparency, and strengthen local-level coordination among public security and labour authorities. These measures reflect an evolving effort to manage mobility in a manner consistent with both domestic planning and global engagement.

It is important to note that China's migration governance remains dynamic. Reforms to the *Hukou* household registration system have gradually expanded access to urban residency and social services, particularly in small and medium-sized cities.⁶⁷ Simultaneously, the state's engagement with BRI partner countries has increased the complexity of its migration governance, requiring new regulatory responses to cross-border labour flows.⁶⁸

2.3 Contemporary Patterns and Policy Responses

Migration patterns in Indonesia and China today are shaped by global and regional economic dynamics, domestic labour markets, and the evolving regulatory frameworks of both states. While Indonesia continues to experience large-scale cross-border labour migration, China manages both internal and external mobility within a comprehensive system of administrative governance. This section examines key contemporary developments, including the feminisation of migration, irregular migration management, the integration of digital technologies, and the adaptive policy measures implemented in response to recent global challenges.

2.3.1 Indonesia

The most notable characteristic of Indonesia's migration profile in recent decades is the feminisation of labour migration. As of 2024, women constitute approximately 60 per cent of all officially deployed migrant workers, primarily employed in the domestic and care sectors in Malaysia, Singapore, Hong Kong, and the Middle East.⁶⁹ This demographic pattern reflects global care economy trends, while also exposing Indonesian women to structural vulnerabilities, including informal recruitment, debt bondage, and limited legal protection abroad.⁷⁰

⁶⁷ Ruan, *op.cit.*, 1029-1030.

⁶⁸ Shaleen Khanal and Hongzhou Zhang, "Ten years of China's Belt and Road Initiative: A bibliometric review." *Journal of Chinese Political Science* 29, no. 2 (2024): 362,

⁶⁹ Afriansyah Noor et al, "The Dynamics of Indonesian Migrant Worker Placement in 2024: Challenges and Competence Enhancement Strategies in the Global Labour Market," *E-Bangi Journal of Social Science and Humanities* 22, no. 2 (2025): 305-306, <https://doi.org/10.17576/ebangi.2025.2202.25>

⁷⁰ IOM, "IOM International Organization for Migration Labour Migration from Indonesia", (2010), 7 https://www.iom.int/sites/g/files/tmzbd1486/files/jahia/webdav/shared/shared/mainsite/published_docs/Final-LM-Report-English.pdf

Indonesia's policy response has focused on strengthening pre-departure and post-placement protection mechanisms. Law No. 18 of 2017 mandates the provision of standardised training, insurance, and accessible complaint mechanisms through one-stop service centres.⁷¹ The BP2MI has also developed digital platforms, including the *SIAPkerja Migran* portal and *Sistem Komputerisasi Perlindungan Pekerja Migran Indonesia* (SISKOP2MI),⁷² to facilitate electronic registration and monitoring of migrant worker placements.⁷³ These initiatives aim to enhance transparency and reduce dependence on informal brokers,⁷⁴ who have historically dominated recruitment.⁷⁵

Moreover, Indonesia has expanded bilateral cooperation to improve the legal status of its workers abroad. Recent agreements with Malaysia (2022)⁷⁶ and Saudi Arabia (2025)⁷⁷ include commitments on wage protection, rest days, and repatriation assistance.⁷⁸ Yet, challenges persist in ensuring compliance, as many destination countries continue to regulate domestic work under private law, outside formal labour frameworks.⁷⁹ To address reintegration, Indonesia has established local-level reintegration programmes focusing on financial literacy, entrepreneurship, and psychosocial support for returning migrants.⁸⁰ These programmes are implemented in collaboration

⁷¹ Law of the Republic of Indonesia No. 18 of 2017 on the Protection of Indonesian Migrant Workers, Art. 38.

⁷² SISKOP2MI (Indonesian Migrant Worker Protection Computerised System) and SIAPkerja Migran are two integrated systems, with SISKOP2MI serving as the main BP2MI system for data processing, document fulfilment, and biometrics (at BP3MI), while SIAPkerja serves as the initial registration portal and agreement signing platform at the LTSA (One-Stop Integrated Service) offices in districts/cities, with data from SIAPkerja subsequently synchronised with SISKOP2MI for further processing. The main difference lies in their functional focus: SIAPkerja is for initial registration and agreements, then the data flows to SISKOP2MI for further stages such as verification and biometric data collection.

⁷³ BP2MI, "Laporan Tahunan BP2MI Tahun 2023," (2023): 22-23 https://kp2mi.go.id/uploads/publikasi/images/data_03-10-2024_Laporan_Tahunan_BP2MI_Tahun_2023.pdf

⁷⁴ Informal broker known as "*calo, petugas lapang*" – who recruit migrant worker directly in village or other underdeveloped area that are sent to destinations country. See Jhon Lindquist, "Reassembling Indonesia Migration: Biometric Technology and the Licensing of Informal Labour Brokers," *ETHNOS* 83, no. 5 (2018): 832.

⁷⁵ Amnesty International. *Exploited for Profit, failed by Governments: Indonesia Migrant Domestic Workers Trafficked to Hongkong* (Amnesty International, 2013), 6.

⁷⁶ Memorandum of Understanding between The Government of Republic of Indonesia and the Federation of Malaysia on the Placement and Protection of Indonesia Migrant Workers (PMI) in the Domestic Sector, (2020).

⁷⁷ Memorandum of Understanding between The Government of Republic of Indonesia and The Kingdom of Saudi Arabia on Migrant Worker Placement and Protection, (2025)

⁷⁸ Ministry of Manpower of the Republic of Indonesia, *Bilateral Labour Agreement between Indonesia and Malaysia* (Kuala Lumpur: 2022), Arts. 4-9.

⁷⁹ Human Rights Watch. "*As If I Am Not Human*": *Abuses against Asian Domestic Workers in Saudi Arabia* (HRW, 2021), 25.

⁸⁰ "Strengthening Return and Reintegration Supports for Victims of Trafficking and Vulnerable Migrants," IOM, accessed August 15, 2025, <https://indonesia.iom.int/news/strengthening-return-and-reintegration-supports-victims-trafficking-and-vulnerable-migrants>. See also: Ali Maksum, "Indonesia Post-Migrant Workers:

with local governments and civil society, reflecting the decentralised nature of Indonesia's migration governance.⁸¹

The COVID-19 pandemic further tested Indonesia's capacity to manage returning migration. Between 2020 and 2022, over 300,000 migrant workers were repatriated, prompting the government to strengthen health screening, quarantine management, and digital verification systems.⁸² This period accelerated the digital transformation of migration services, with the state emphasizing resilience and coordination among ministries, local governments, and embassies.⁸³ Overall, Indonesia's policy trajectory illustrates a shift toward rights-based governance that seeks to integrate protection, empowerment, and national development.

2.3.2. China

In contrast, China's migration dynamics are dominated by internal movement. As of 2023, internal migrants—defined as citizens living outside their registered *Hukou* locality—numbered 95 million, representing one of the largest mobile populations worldwide.⁸⁴ This internal mobility has supported industrialisation and urbanisation, contributing significantly to national economic growth.⁸⁵ However, disparities persist in access to urban welfare benefits, as the *Hukou* system continues to condition entitlements on residence status.⁸⁶

Recent policy reforms have sought to moderate these disparities. The 2022 Opinions on Further Promoting Urbanization Reform introduced measures to ease *Hukou* restrictions in small and medium-sized cities, thereby facilitating legal settlement for millions of rural migrants.⁸⁷ Parallel reforms in labour and social security law have enhanced protection for migrant workers, including access to minimum-wage guarantees, social insurance, and dispute-resolution mechanisms.⁸⁸ These initiatives reflect a gradual evolution toward inclusive governance, even as administrative oversight remains central to migration management.

A Challenging Problem for Human Security,” *Social Sciences & Humanities Open* 4, no. 1 (2021): 5-6.

⁸¹ *Ibid.*

⁸² IOM, “Memperkuat Kapasitas Desa untuk Pelindungan dan Pemberdayaan Pekerja Migran: Praktik Terbaik selama Pandemi COVID-19,” IOM, (2021): 1; See Also: Muhammad Salahudin Al Ayyubi et al, “Migrant Workers and Labor Market Recovery during the COVID-19 Pandemic in Indonesia,” *Social Sciences & Humanities Open* 12 (2025): 5.

⁸³ Elfia Farida et al, “Digitisation in the Protection of Indonesian Migrant Workers: Improving Safety and Welfare in the Era of Globalisation,” *OIDA International Journal of Sustainable Development* 18, no. 12 (2025): 513.

⁸⁴ Mengyao Cheng and Chengrong Duan, “The Changing Trends of Internal Migration and Urbanization in China: New Evidence from the Seventh National Population Census,” *China Population and Development Studies* 5, no. 3 (2021): 288.

⁸⁵ Trémon, Chen and Liu, *op.cit.*, 630.

⁸⁶ Lu et al, *op.cit.*, 2.

⁸⁷ Speelman, *op.cit.*, 28.

⁸⁸ Giuseppe Casale and Changyou Zhu. *Labour Administration Reforms in China* (International Labour Office, 2013): 9-13.

China has also emerged as a destination country for foreign workers and students.⁸⁹ Most foreign migrants in China are concentrated in manufacturing and service industries in coastal provinces, or in the education and investment sectors in metropolitan areas such as Beijing, Shanghai, and Guangzhou.⁹⁰ Although China's foreign population remains relatively small—estimated at around 1 million—it represents a growing dimension of its migration landscape.⁹¹

The government's policy responses emphasise administrative efficiency, data integration, and public security. Since 2018, the NIA has implemented nationwide visa management systems, biometric registration, and online service platforms to streamline legal migration procedures. During the COVID-19 pandemic, China adopted temporary entry restrictions while introducing electronic visa extensions and health monitoring protocols for foreign residents.⁹² The combination of preventive measures and digitalization reflects the state's adaptive approach to migration management within broader public health and security considerations.

At the same time, China's engagement with migration under the BRI has expanded.⁹³ The movement of Chinese professionals abroad and the entry of foreign workers associated with BRI projects have required enhanced administrative coordination and international cooperation.⁹⁴ In response, China has increasingly participated in regional dialogues on migration, including within the China-ASEAN Human Resources Cooperation Framework and through technical exchanges with the IOM.⁹⁵ These developments indicate a pragmatic approach focused on regulated mobility, mutual benefit, and policy learning rather than ideological convergence.

2.4 Divergent Governance Logics: Decentralization and Centralization

The comparative analysis of Indonesia and China reveals the capacity of distinct political and legal systems to produce functionally comparable outcomes in migration governance. As two distinct yet functionally comparable governance logics, shaped by broader constitutional and administrative traditions,⁹⁶ both states rely on strong administrative coordination and state-centered regulation to manage mobility in ways that reflect their respective constitutional frameworks, development priorities, and

⁸⁹ Pieke, *op.cit.*, 141.

⁹⁰ Cheng, *op.cit.*, 288.

⁹¹ "Hello China or Goodbye China?" DirectHR, accessed August 10, 2025: 6, <https://www.hkdca.com/wp-content/uploads/2025/03/hello-china-or-goodbye-china-directhr.pdf>

⁹² “在华外国人高度评价中国国家移民管理局在防疫抗疫期间提供多种移民管理服务 (Foreigners in China Highly Praised the NIA of China for Providing a Variety of Immigration Management Services During the Pandemic),” Nia.gov.cn, accessed August 15, 2025, <https://www.nia.gov.cn/n794014/n1050176/n1051040/c1238290/content.html>

⁹³ Khanal, *op.cit.*, 384.

⁹⁴ Ran Hu, "Assembling China's Belt and Road Initiative: Discourse, Institution, and Materials," *International Political Sociology* 18, no. 1 (2024): 7.

⁹⁵ *Ibid.*, 9. See also: NIA. "Over 25.24 Million Trips: Travel Volume Between China and ASEAN Continues Surging". <https://en.nia.gov.cn/n147413/c184877/content.html>

⁹⁶ Eric Fong, & Kumiko Shibuya., *op.cit.*, 512.

international engagement. While Indonesia's approach is grounded in participatory protection and decentralisation, China's model emphasises administrative integration, policy coherence, and gradual reform. Neither system is static, as both are characterised by continuing adaptation to global, regional, and domestic pressures.

Indonesia's migration governance reflects its post-reform constitutional commitment to decentralisation and participatory governance.⁹⁷ The Law No. 18 of 2017 exemplifies this orientation by allocating responsibilities across central, provincial, and local institutions while reinforcing the state's duty to protect its citizens abroad.⁹⁸ The inclusion of provisions on pre-departure education, digital registration, and reintegration programmes demonstrates an explicit concern for migrant welfare.⁹⁹ On the other hand, China's governance logic differs in ways consistent with its administrative tradition. The Exit and Entry Administration Law (2013), together with the establishment of the NIA in 2018, illustrates the country's effort to unify and streamline migration governance under a single institutional framework. This approach promotes predictability and administrative efficiency, ensuring consistency across regions and agencies.¹⁰⁰ It also reflects the state's gradual process of legal modernisation, balancing openness with coordination.

The contrast between decentralisation and centralization becomes particularly visible in enforcement. Indonesia's decentralised governance allows local governments to play an active role in monitoring recruitment practices and supporting returning migrants, while also producing uneven implementation and coordination challenges across regions.¹⁰¹ China's centralised system, by contrast, prioritises uniform enforcement and integrated data management, enabling authorities to monitor migration status and employment compliance with greater consistency.¹⁰² This approach reflects a governance preference for order and stability, while also minimising regulatory fragmentation in a highly mobile society.¹⁰³

These differing governance logics also influence how each country engages beyond its borders. Indonesia's rights-oriented and participatory framework aligns closely with ASEAN's normative agenda on migrant-worker protection, positioning Indonesia as an active contributor to regional standard-setting.¹⁰⁴ China's engagement follows a different path, emphasising bilateral cooperation and technical coordination, particularly within the context of BRI.¹⁰⁵ Although these modes of engagement differ, both states treat migration as an integral component of broader development strategies rather than as an isolated policy field.

⁹⁷ IOM, *op.cit.*, 16.

⁹⁸ Law of the Republic of Indonesia No. 18 of 2017 on the Protection of Indonesian Migrant Workers, Art. 33.

⁹⁹ IOM, *op.cit.*, 26.

¹⁰⁰ NIA, *loc.cit.*

¹⁰¹ Elfia Farida, *op.cit.*, 135.

¹⁰² Mimi Zou, "Regulating Illegal Work in China," *SSRN Electronic Journal* (2016): 9.

¹⁰³ Ruan, *op.cit.*, 1036.

¹⁰⁴ ASEAN, *op.cit.*, Chapter 5.

¹⁰⁵ Ran Hu, *op.cit.*, 2.

Overall, the comparison shows that Indonesia and China should not be understood as representing opposing ends of a spectrum between protection and control. Instead, they illustrate different ways in which states seek to govern mobility responsibly within their own legal and political contexts. Indonesia advances protection through decentralised, rights-based governance, while China relies on centralised administrative coordination to deliver regulatory predictability and inclusion. Despite these differences, both approaches share an effort to balance migration management with evolving concerns for migrant welfare, suggesting an emerging convergence in state-led migration governance across Asia.

2.4.1 Protection and Policy Innovation

Indonesia's reforms have been guided by the principle of protection, aligning with international labour standards and the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017). The incorporation of gender-sensitive provisions and digital service delivery represents innovative steps in the regional context.¹⁰⁶ However, the fragmented nature of Indonesia's decentralised bureaucracy sometimes limits uniform enforcement. Bilateral labour agreements remain the main vehicle for ensuring protection abroad, yet their effectiveness depends heavily on cooperation with destination states.¹⁰⁷

In China, protection mechanisms are structured differently but are evolving in tandem with administrative innovation. The government's focus on simplifying residence and work permit procedures, improving access to social insurance, and expanding *Hukou* reforms in smaller cities illustrates a gradual move toward inclusive governance.¹⁰⁸ While the framework emphasises procedural regulation rather than explicit rights discourse, it contributes substantively to the protection of lawful migrants through stability, regularisation, and predictability.

China's cooperation with international organisations—such as the IOM and the UNHCR¹⁰⁹—also represents an openness to engaging with global migration norms. These partnerships have supported technical exchanges on migration data, public administration, and humanitarian protection.¹¹⁰ Therefore, the Chinese approach may therefore be described as “administratively protective”, emphasising order and managed inclusivity within its legal-administrative tradition.

¹⁰⁶ ILO. *Panduan Teknis Penyelenggaraan Layanan Dan Pelindungan Pekerja Migran Indonesia Yang Responsif Gender (Implementasi Undang-Undang Pelindungan Pekerja Migran Indonesia Nomor 18 Tahun 2017)* (ILO, 2022), 122.

¹⁰⁷ Pipit Saraswati, Rahtami Susanti, and Bayu Setiawan, “Protection of Indonesian Migrant Workers (Pekerja Migran Indonesia, PMI) in Problems Abroad,” *UMPurwokerto Law Review* 2, no. 2 (2021): 102-104.

¹⁰⁸ Trémon Chen and Na, *op.cit.*, 630.

¹⁰⁹ “China to Cooperate with IOM on Global Migration Governance: Qin Gang”, CGN, Accessed 10 December 2025, <https://news.cgtn.com/news/2023-04-03/China-to-cooperate-with-IOM-on-global-migration-governance-Qin-Gang-1i11Adtr1K/index.html>

¹¹⁰ Song, *op.cit.*, 150.

2.4.2 Managing Irregularity and Vulnerability

Both Indonesia and China face challenges associated with irregular migration and their protection, albeit in different contexts. For Indonesia, irregular migration often involves undocumented workers abroad and unregulated recruitment practices.¹¹¹ In response, Indonesia has strengthened oversight through licensing requirements for recruitment agencies, the criminalisation of illegal placement, and digital monitoring of recruitment processes. These measures are complemented by public awareness campaigns and intergovernmental coordination aimed at preventing trafficking and exploitation.¹¹²

China's irregular migration concerns are primarily inward-facing, relating to unauthorised stay or employment by foreign nationals.¹¹³ The Exit and Entry Administration Law provides for administrative sanctions, detention, and deportation in cases of irregularity, while also ensuring due process through appeal and review procedures.¹¹⁴ Enforcement is combined with outreach measures, such as public information campaigns and voluntary departure mechanisms, to encourage regularisation. This combination of firmness and procedural regularity reflects a policy of calibrated control, consistent with China's focus on maintaining social order while managing an increasingly diverse population.

Both countries' approaches underscore the tension between control and protection—a defining feature of migration governance globally. Yet their policies also show a shared commitment to institutional adaptation, legal refinement, and administrative learning.

2.4.3 Regional Engagement and Emerging Convergence

At the regional level, Indonesia and China are increasingly engaged in cooperative frameworks that blur traditional distinctions between sending and receiving states. Indonesia's participation in ASEAN's migration agenda positions it as a leading advocate for the promotion of migrant rights and regional standard-setting. China's engagement, though not within ASEAN per se, occurs through the BRI and related human resources and labour dialogues.

These interactions reveal emerging points of convergence. Both states emphasise safe, orderly, and well-managed migration, in line with the Global Compact for Safe, Orderly and Regular Migration.¹¹⁵ Both also view migration

¹¹¹ Arthur Josias and Ridwan Arifin, "New Patterns and Trends of Migration: Hybrid-Crimes among Indonesian Migrant Workers in Southeast Asia," *Regional Science Policy & Practice* 17 (June 1, 2025): 2.

¹¹² IOM and Ministry of Women Empowerment and Children Protection, "Technical Guidelines for Effective Anti-Trafficking Task Forces" (Jakarta: IOM, 2019): 31.

¹¹³ Mimi Zou, *op.cit.*, 10

¹¹⁴ People's Republic of China, *Exit and Entry Administration Law* (2013), Art. 59-64 and 70.

¹¹⁵ Those non-binding international framework is sets out shared principles and objectivities for managing migration in cooperative and predictable manner. It emphasizes reducing risks faced by migrants, promoting regular migration pathways, and improving coordination among states, while fully respecting national sovereignty. Rather than imposing

as part of broader development cooperation—Indonesia through remittance-led local empowerment, and China through infrastructure-driven economic integration. This convergence indicates the gradual emergence of Asian models of migration governance, characterised by pragmatism, incrementalism, and regional interdependence.

2.4.4 Toward Rights-Sensitive Governance in Asia

The comparative analysis of Indonesia and China suggests that migration governance in Asia is not a dichotomy between control and rights but a process of contextual balancing. Indonesia's framework emphasises the rights of citizens abroad, while China's system prioritises administrative inclusivity and stability within its borders. Both trajectories reflect evolving understandings of state responsibility in regulating human mobility. Thus, a rights-sensitive approach for the region would not require uniformity but mutual reinforcement.

The characterisation of China's migration governance as a "rights-sensitive" model, however, requires careful qualification. Unlike Indonesia, whose legal framework increasingly adopts the language of protection, welfare, and migrant rights, China's approach remains predominantly rooted in administrative coordination, social stability, and development management. The Exit and Entry Administration Law of 2013, the establishment of the National Immigration Administration in 2018, and ongoing Hukou reforms demonstrate efforts to improve regulatory coherence, procedural clarity, and controlled inclusion for both internal and external migrants. These measures may generate protective effects, such as clearer legal status, improved access to certain services, and more predictable administrative procedures. Nevertheless, such effects should not be overstated as evidence of a fully rights-based migration regime. In the Chinese context, sensitivity to migrant welfare is better understood as emerging through administratively managed inclusion rather than through explicit recognition of migrants as rights-bearing subjects. Therefore, while China may reflect a limited form of protection-oriented governance, any claim that it is shaping a "rights-sensitive" migration model must be framed cautiously and supported by a nuanced distinction between administrative protection and rights-based legal commitment.

Strengthening inter-agency coordination in Indonesia, enhancing procedural safeguards in China, and promoting regional cooperation between ASEAN and China could collectively advance more coherent and humane migration governance. These developments demonstrate that Asian states, through diverse institutional pathways, are actively shaping a new normative landscape of migration law—one that reconciles development imperatives with the protection of human dignity.

legal obligations, the Compact serves as a common reference point for states seeking to improve migration governance through dialogue and practical cooperation. "Global Compact Safe, Orderly and Regular Migration", Muse Mohammed (IOM), accessed on January 12, 2026, <https://www.iom.int/global-compact-migration>.

3. CONCLUSION

Indonesia and China's approaches to migration governance have distinct yet converging frameworks that reflect their respective political and institutional traditions. Both countries balance state control with increasing attention to migrant welfare, revealing a shared understanding of migration as an instrument of development and governance rather than solely a human rights issue. Indonesia's Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers establishes a decentralised, protection-oriented model that prioritises the recognition of rights, local participation, and gender-sensitive protections. China's Exit and Entry Administration Law (2013) and the institutional role of the National Immigration Administration's institutional role demonstrate a centralised, administratively coherent approach that emphasizes order, procedural transparency, and gradual inclusion. Together, these frameworks illustrate the emergence of Asian models of migration governance that adapt international norms to domestic priorities. Both states show that effective migration regulation can integrate economic pragmatism with evolving rights awareness. Future developments in regional cooperation, particularly through ASEAN mechanisms and Belt and Road labour frameworks, may further shape a rights-sensitive, regionally grounded approach to migration law in Asia. Nevertheless, this article has certain limitations. Its primary focus is on laws, policies, and institutions, and it does not comprehensively evaluate the practical implementation of these rules or their effectiveness in protecting migrants. Caution is also necessary when making comparisons, particularly regarding China, where protection is primarily achieved through administrative management rather than an explicit rights-based framework. Therefore, future research should integrate normative legal analysis with empirical studies of enforcement and migrant experiences.

BIBLIOGRAPHY

Book

- Hansen, Randall. *War, Work, and Want: How the OPEC Oil Crisis Caused Mass Migration and Revolution*. New York: Oxford Academic, 2023.
<https://doi.org/10.1093/oso/9780197657690.002.0010>
- Haugen, Heidi Østbø, and Bingyu Wang. *Handbook on Migration to China*. Edward Elgar Publishing, 2025.
<https://doi.org/10.4337/9781035332700>
- Hong, Mi, Li Yuan and MA Qiyini. *The Belt and Road" International Migration of Asia*. New York: Routledge, 2021.
<https://doi.org/10.4324/9781003189473>
- Wang, Fei-Ling. *Organizing through Division and Exclusion: China's Hukou System*. Stanford: Stanford University Press, 2005.
<https://doi.org/10.1515/9780804767484>

Journal Article

- Agusmidah et al. "ASEAN's Migrant Rights Policy Dilemma and Deadlock on Migrant Worker Protection." *Journal of Human Rights, Culture and Legal System* 5, no. 3 (2025): 714-748. <https://doi.org/10.53955/jhcls.v5i3.581>
- Al Ayyubi, Muhammad Salahudin et al. "Migrant Workers and Labor Market Recovery during the COVID-19 Pandemic in Indonesia." *Social Sciences & Humanities Open* 12 (2025): 1-14. <https://doi.org/10.1016/j.ssaho.2025.101715>
- Anggara, Reddy, Slamet Mulyana, Gati Gayatri, and Hanny Hafiar. "Understanding the Motivations of being Indonesia Migrant Workers." *Cogent Social Sciences* 10, no. 1, (2024): 1-13. <https://doi.org/10.1080/23311886.2024.2333968>
- Aqnisyah, Devara Izzatun and Dian Azmawati. "Evaluating the effectiveness of indonesia-iom cooperation in the governance of human trafficking and illegal labor migration." *UMYGRACE* 1, no. 3 (2023): 194-205. <https://doi.org/10.18196/umygrace.v3i1.548>
- Bharati, Tushar, Adnan Fakir, and Wina Yoman. "Internal migration and labor market outcomes in indonesia." *Economic Development and Cultural Change* 72, no. 2 (2024): 997-1040. <https://doi.org/10.1086/721684>
- Calendar, Olga K. "On the Indonesian Labour Migration to Malaysia." *South East Asia Actual Problems of Development* 56, no. 3 (2022): 99-112. <https://sea.ivran.ru/en-articles?artid=211509>
- Chan, Chris King-Chi and Elaine Sio-Ieng Hui. "Pension Systems and Labour Resistance in Post-Socialist China and Vietnam: A Welfare Regime Analysis." *Journal of Contemporary Asia* 53, no. 2 (2022): 1-20. <https://doi.org/10.1080/00472336.2021.2016246>
- Chan, Kam Wing and Li Zhang. "The Hukou System and Rural-Urban Migration in China: Processes and Changes." *The China Quarterly* 160 (1999): 818-855. <https://doi.org/10.1017/S0305741000001351>
- Cheng, Mengyao and Chengrong Duan. "The Changing Trends of Internal Migration and Urbanization in China: New Evidence from the Seventh National Population Census." *China Population and Development Studies* 5, no. 3 (2021): 275-95. <https://doi.org/10.1007/s42379-021-00093-7>
- Damayanti, Sri, Yudi Ferdiansyah, and Shafira Dita Sasmita. "Mapping Labor Migration Trends Indonesia-Malaysia: Implications for Labor Markets, Remittances, and Bilateral Policies." *Neo Journal of Economy and Social Humanities* 4, no. 2 (2025): 225-240. <https://doi.org/10.56403/nejesh.v4i2.262>
- Farida, Elfia et al. "Digitisation in the Protection of Indonesian Migrant Workers: Improving Safety and Welfare in the Era of Globalisation." *OIDA International Journal of Sustainable Development* 18, no. 12 (2025): 501-516. <https://ssrn.com/abstract=5792843>
- Farida, Elfia. "Empowering Indonesia Migrant Worker: Human Rights-Based Legal Protection Through Village Regulations and Bilateral Agreements." *Journal of Southeast Asian Human Rights* 9, no. 1 (2025): 122-146. <https://doi.org/10.19184/jseahr.v9i1.53034>

- Fong, Eric, and Kumiko Shibuya. "Migration patterns in East and Southeast Asia: Causes and consequences." *Annual Review of Sociology* 46, no. 1 (2020): 511-531. <https://doi.org/10.1146/annurev-soc-121919-054644>
- Hidayah, Anis. "Bilateral Labour Agreements and Migrant Protection in Indonesia." *Asian Journal of International Law* 13, no. 1 (2023): 67-90. <https://doi.org/10.1017/S2044251322000349>
- Hu, Ran. "Assembling China's Belt and Road Initiative: Discourse, Institution, and Materials." *International Political Sociology* 18, no. 1 (2024):1-25. <https://doi.org/10.1093/ips/olae002>
- Josias, Arthur, and Ridwan Arifin. "New Patterns and Trends of Migration: Hybrid-Crimes among Indonesian Migrant Workers in Southeast Asia." *Regional Science Policy & Practice* 17, no. 10 (2025): 1-12. <https://doi.org/10.1016/j.rspp.2025.100215>
- Karina, K. and Maidah Purwanti. "Indonesia's national policy on international migration." *Journal of Law and Border Protection* 1, no. 3 (2021): 115-123. <https://doi.org/10.52617/jlbp.v3i1.213>
- Khanal, Shaleen, and Hongzhou Zhang. "Ten years of China's Belt and Road Initiative: A bibliometric review." *Journal of Chinese Political Science* 29, no. 2 (2024): 361-395. <https://doi.org/10.1007/s11366-023-09873-z>
- Lindquist, Jhon. "Reassembling Indonesia Migration: Biometric Technology and the Licensing of Informal Labour Brokers." *ETHNOS* 83, no. 5 (2018): 832-849. <https://doi.org/10.1080/00141844.2017.1364780>
- Liu, Guofu. "Legislation, Impacts and Deficiencies of the Law of Exit and Entry Administration of China 2013." *International Journal of Public Law and Policy* 4, no. 4 (2014): 381-392. <https://doi.org/10.1504/ijplap.2014.065212>
- Lu, Chen et al. "How Urban Welfare Affects the Hukou Selection of Rural Migrants That Belong to Dual-Hukou Families in China." *Comparative Migration Studies* 13, no. 1 (2025): 1-27. <https://doi.org/10.1186/s40878-025-00422-6>
- Maksum, Ali. "Indonesia Post-Migrant Workers: A Challenging Problem for Human Security." *Social Sciences & Humanities Open* 4, no. 1 (2021): 5-6. <https://doi.org/10.1016/j.ssaho.2021.100223>
- Man, Pui Kwan and E. Fong. "Momentum of Chinese migration scholarship in East and Southeast Asia." *Asian Population Studies* 17, no. 2 (2021): 117-120. <https://doi.org/10.1080/17441730.2020.1858570>
- Matusz-Protasiewicz, Patrycja. "Cities Towards Migrants. Case Study of Local Integration Policies of Gdańsk and Wrocław." *Polish Political Science Review* 2, no. 8 (2020): 22-36. <https://doi.org/10.2478/ppsr-2020-0013>
- Noor, Afriansyah et al. "The Dynamics of Indonesian Migrant Worker Placement in 2024: Challenges and Competence Enhancement Strategies in the Global Labour Market." *E-Bangi Journal of Social Science and Humanities* 22, no. 2 (2025): 299-311. <https://doi.org/10.17576/ebangi.2025.2202.25>

- Pieke, Frank N. "Immigration in China: A Typology and Trends." *East Asian Policy* 17, no. 1 (2025): 140-57. <https://doi.org/10.1142/s179393052500008x>
- Plümmer, Franziska. "Contested Administrative Capacity in Border Management: China and the Greater Mekong Subregion." *China Information* 36, no. 3 (2022): 407-429. <https://doi.org/10.1177/0920203x221103053>
- Putri, Dina Eka, and Mega Nisfa Makhroja. "Trend Analysis of Indonesian Migrant Worker Profiles: Redirecting Strategy on Indonesia's Demographic Bonus." *Indonesian Journal of Peace and Security Studies (IJPSS)* 5, no. 1 (2023): 56-76. <https://doi.org/10.29303/ijpss.v5i1.125>
- Romadhona, Mochammad Kevin, Sri Endah Kinansih, Rachmad Dimas Oktafenanda. "Labour Migration Policy in ASEAN State." *International Law Discourse in Southeast Asia* 4, no. 1 (2025): 81-128. <https://doi.org/10.15294/ildisea.v4i1.23485>
- Ruan, Zhihang. "Dualist Land Regime, the *Hukou* System and the Welfare of Migrant Workers in Chinese Cities." *The China Quarterly* 260, no. 1 (2024): 1024-1039. <https://doi.org/10.1017/s0305741024000304>
- Saraswati, Pipit, Rahtami Susanti, and Bayu Setiawan. "Protection of Indonesian Migrant Workers (Pekerja Migran Indonesia, PMI) in Problems Abroad." *UMPurwokerto Law Review* 2, no. 2 (2021): 98-107. <https://doi.org/10.30595/umplr.v2i2.8677>
- Shoemith, Dennis, Nathan Franklin, and Rachmat Hidayat. "Decentralised Governance in Indonesia's Disadvantaged Regions: A Critique of the Underperforming Model of Local Governance in Eastern Indonesia." *Journal of Current Southeast Asian Affairs* 39, no. 3 (2020): 359-380. <https://doi.org/10.1177/1868103420963140>
- Song, Lili. "China and the International Refugee Protection Regime: Past, Present, and Potentials." *Refugee Survey Quarterly* 37, no. 2 (2018): 139-161. <https://doi.org/10.1093/rsq/hdy003>
- Speelman, Tabitha. "Establishing the National Immigration Administration: Change and Continuity in China's Immigration Reforms." *China Perspectives* 2020, no. 2020/4 (2020): 7-16. <https://doi.org/10.4000/chinaperspectives.11103>
- Susanto, Fransiska A. "The UK-Rwanda Migration and Economic Development Partnership Based on International Refugees Law." *Padjadjaran Jurnal Ilmu Hukum* 12, no. 1 (2025): 90-112. <https://doi.org/10.22304/pjih.v12n1.a5>
- Suyanto. "Job Shift of The Indonesian International Return Migrant in Central Java Province." *E3S Web of Conferences* 202, no. 07036 (2020) : 1-9. <https://doi.org/10.1051/e3sconf/202020207036>
- Trémon, Anne-Christine, Cliff Chen, and Na Liu. "Citizenization or Talent Recruitment? The Development of China's Points-Based *Hukou* Channels." *Journal of Contemporary China* 34, no. 154 (2024): 1-17. <https://doi.org/10.1080/10670564.2024.2360058>
- Ullah, A. K. M. Ahsan. "Connectivity and Mobility: The Transformative Impact of BRI on Migration Dynamics in the MENA." *Politics & Policy* 53, no. 3 (2025): 1-13. <https://doi.org/10.1111/polp.70048>

- Wu, Wenfang, and Xuan Luo. "Legal Framework for the Protection of Foreign Employees in China." *Employee Relations: The International Journal* 44, no. 5 (2022): 1142–56. <https://doi.org/10.1108/er-07-2021-0335>
- Yang, Ziyu. "Overall Thinking of China's Eighth Institutional Reform under the Perspective of System Theory." *Open Journal of Social Sciences* 7, no. 5 (2019): 246-258. <https://doi.org/10.4236/jss.2019.75022>
<https://doi.org/10.1080/15562948.2025.2529483>
- Zou, Mimi. "Regulating Illegal Work in China." *SSRN Electronic Journal*, (2016): 1-12. <https://doi.org/10.2139/ssrn.2811301>

Legal Documents

- Association of Southeast Asian Nations (ASEAN). ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers.
- People's Republic of China. Exit and Entry Administration Law (2013)
- People's Republic of China. State Council of China, Institutional Reform Plan (Beijing: 2018).
- Republic of Indonesia. The 1945 Constitution of the Republic of Indonesia
- Republic of Indonesia. Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers.
- Republic of Indonesia. Law No. 6 of 2023 on Job Creation
- Republic of Indonesia. Government Regulation No. 59 of 2021 on the Implementation of Protection Indonesian Migrant Workers
- Republic of Indonesia. Presidential Regulation No. 125 of 2016 concerning the Treatment of Refugees
- Republic of Indonesia. Presidential Regulation No.130 of 2024 concerning Strengthening Governance for the Placement and Protection of Indonesian Migrant Workers.
- Republic of Indonesia. Presidential Regulation No. 165 of 2024 concerning the Ministry of Protection of Indonesian Migrant Workers
- Republic of Indonesia. Regulation of Minister of Manpower No. 9 of 2019 on Procedures for Placement and Protection of Migrant Workers Abroad.
- Republic of Indonesia. Regulation of the Minister of Protection of Indonesian Migrant Workers/Indonesian Migrant Workers Protection Agency No. 23 of 2025 concerning Complaints Services and Handling of Problems for Prospective Indonesian Migrant Workers or Indonesian Migrant Workers
- Republic of Indonesia and the Federation of Malaysia. Memorandum of Understanding between The Government of Republic of Indonesia and the Federation of Malaysia on the Placement and Protection of Indonesia Migrant Workers (PMI) in the Domestic Sector, (2020).
- Republic of Indonesia. Ministry of Manpower Bilateral Labor Agreement between Indonesia and Malaysia.

Other Document

- Amnesty International. Amnesty International, *Exploited for Profit, failed by Governments: Indonesia Migrant Domestic Workers Trafficked to Hongkong*, (London: Amnesty International, 2013)

- ASEAN Secretariat. "Outlook," (Jakarta: ASEAN, 2022) <https://asean.org/wp-content/uploads/2022/08/ASEAN-Migration-Outlook-Final.pdf>
- BP2MI. *Annual Report on the Protection of Indonesian Migrant Workers* (Jakarta: BP2MI, 2024).
- Giuseppe Casale and Changyou Zhu. *Labour Administration Reforms in China* (International Labor Office, 2013)
- Human Rights Watch. "As If I Am Not Human": *Abuses against Asian Domestic Workers in Saudi Arabia* (New York: HRW, 2021)
- Indonesia Business Council, *Expansion of Indonesia's Overseas Worker (PMI) Industry*, (Jakarta: IBC, 2025)
- International Labour Organization. *Panduan Teknis Penyelenggaraan Layanan dan Pelindungan Pekerja Migran Indonesia Yang Responsif Gender (Implementasi Undang-Undang Pelindungan Pekerja Migran Indonesia Nomor 18 Tahun 2017)*. Jakarta: ILO, 2022.
- International Labour Organization. *Digitalization of Labour Migration Services in ASEAN*. Jakarta: ILO, 2019.
- International Organization for Migration. "Labour Migration From Indonesia," (Jakarta: IOM, 2010) https://www.iom.int/sites/g/files/tmzbd1486/files/jahia/webdav/shared/shared/mainsite/published_docs/Final-LM-Report-English.pdf
- International Organization for Migration. "Memperkuat Kapasitas Desa untuk Pelindungan dan Pemberdayaan Pekerja Migran: Praktik Terbaik selama Pandemi Covid-19," (Jakarta: IOM, 2021).
- International Organization for Migration. *Migration Governance Indicators: Indonesia*. Jakarta: IOM, 2024.
- International Organization for Migration. and Ministry of Women Empowerment and Children Protection of the Republic of Indonesia. *Technical Guidelines for Effective Anti-Trafficking Task Forces*. Jakarta: IOM, 2019.
- International Organization for Migration and UNESCAP. *Asia and The Pacific: Regional Strategy 2020-2024*, (Bangkok: IOM, 2023)
- United Nations Economic and Social Commission for Asia and the Pacific (UNESCAP). *Asia-Pacific Migration Report 2022: Transforming Challenges into Opportunities* (Bangkok: UNESCAP, 2022)

Webpage

- DirectHR. "Hello China or Goodbye China?" Accessed August 10, 2025, <https://www.hkdca.com/wp-content/uploads/2025/03/hello-china-or-goodbye-china-directhr.pdf>
- International Organization for Migration. "Strengthening Return and Reintegration Supports for Victims of Trafficking and Vulnerable Migrants." Accessed August 15, 2025. <https://indonesia.iom.int/news/strengthening-return-and-reintegration-supports-victims-trafficking-and-vulnerable-migrants>
- Mohammed, Muse (IOM). "Global Compact Safe, Orderly and Regular Migration." Accessed January 12, 2026. <https://www.iom.int/global-compact-migration>

- National Immigration Administration. “610 Million Exit-Entry Trips Recorded in 2024, Marking a 43.9% YoY Increase.” Accessed August 15, 2025. <https://en.nia.gov.cn/n147413/c179666/content.html>.
- . “在华外国人高度评价中国国家移民管理局在防疫抗疫期间提供多种移民管理服务。” Accessed August 15, 2025. https://www.nia.gov.cn/n794014/n1050176/n1051040/c1238290/content.html?utm_source
- Østbø, Heidi and Tabitha Speelman. “China’s Rapid Development Has Transformed Its Migration Trends.” Accessed August 15, 2025. https://www.migrationpolicy.org/article/china-development-transformed-migration?utm_source
- United Nations High Commission for Refugees. “Fact Sheet : People’s Republic of China.” UNHCR, 2020. <https://webarchive.archive.unhcr.org/+https://reporting.unhcr.org/sites/default/files/UNHCR%20China%20Factsheet%20September%202020.pdf>
- United Nations Indonesia. “Migration Governance for Sustainable Development in Indonesia National & Sub-National Levels Central Java Safe Migration and Economic Empowerment Training in East Lombok | ©UN Women 2023 55% MIGRATION GOVERNANCE for SUSTAINABLE DEVELOPMENT in INDONESIA.” UN, 2024. https://indonesia.un.org/sites/default/files/2024-01/Migration%20-%20December%20%28EN%29_0.pdf