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Temporary By Design: National Identity and Migration Policy in Japan and South Korea

In January 2026, Minh, a Vietnamese worker, made international headlines, not for arriving in Japan, but for refusing to leave. He had spent a decade sandblasting ships and welding steel under Japan's Technical Intern Training Program (TITP). He arrived in Japan heavily indebted from $7,500 in recruitment fees, but he had a simple plan. Minh's plan was to work for three years, repay his debt, and send money home. But when his visa expired and opportunities remained scarce in Vietnam, Minh overstayed and became undocumented in Japan. The system had never offered him another option. "Without foreign workers like us," he told reporters, "there is no way Japan's economy can function" (Osaki, 2026).

Six years earlier and across the Korea Strait, a Cambodian woman named Nuon Sokkheng had entered South Korea through the Employment Permit System (EPS), a state-managed labor migration framework that has been one of Asia's most orderly and transparent. She arrived in 2016 on an E-9 work visa, was placed on a vegetable farm in Pocheon, Gyeonggi Province, and worked there for nearly five years. In December 2020, she was found dead inside a vinyl greenhouse where she and four other migrant workers had been housed by their employer, in temperatures that had decreased to negative 18 degrees Celsius (*The Korea Times*, 2020). Even though she had a legal work permit, a registered employer, and a government-designed contract, she was still disposable. In January 2026, South Korea's Supreme Court upheld a verdict finding the government liable for failing to properly oversee her living

conditions, and the Ministry of Employment and Labor issued a formal apology to her family (*The Korea Times*, 2026).

These two lives illustrate a broader dilemma that this paper sets out to explain. Why have Japan and South Korea, facing nearly identical pressures of demographic collapse and acute labor shortage, built such divergent migration policy regimes? I argue that the answer lies not in interests or institutions alone, but in ideas. Although both countries face the same structural conditions of declining fertility rates, aging populations (World Bank, 2023), and persistent employer demand for migrant labor (Oishi, 2012; Seol, 2012), their differing national identity frameworks heavily shape how political elites interpret immigration, as either a permanent economic necessity or a temporary stopgap. In South Korea, a gradual reframing of national identity within a developmental-state logic allowed migration to be institutionalized as a necessary economic management tool, producing the centralized Employment Permit System (Seol, 2012; Chung et al., 2024). In Japan, a long-standing ideology of ethnic homogeneity prevented reframing entirely (Oguma, 2021; Liu-Farrer, 2020). Japanese elites could not publicly accept immigrants permanently, causing the institutions they built to reflect their denial, producing fragmented and deliberately temporary programs like the Technical Intern Training Program (TITP) and the Specified Skilled Worker (SSW) visa (Chung and Hosoki, 2017).

Theoretical Framework

To understand why Japan and South Korea diverge in their migration policy regimes, this paper uses the three I's framework: interests, institutions, and ideas. Economic interests alone are not enough to explain the divergence in migration policy between Japan and South Korea. This is because both countries face nearly identical structural pressures, including severe labor shortages

driven by aging populations and some of the lowest fertility rates in the world (World Bank, 2023). In Japan, many companies have long benefited from access to foreign labor through programs such as the Technical Intern Training Program, which provides flexible, low-cost workers without requiring long-term integration or rights expansion (Oishi, 2012). In South Korea, small and medium-sized enterprises also demand migrant workers to fill their constant vacancies in manufacturing and construction (Seol, 2012). Thus, if economic interests were the primary driver of policy outcomes, we would expect both countries to have converged on similar migration regimes, however they have not. Japan continues to rely on fragmented and temporary labor programs while South Korea has built a centralized, state-managed system (Chung and Hosoki, 2017). Moreover, even though Japan and South Korea have similar economic pressures, they have divergent migrant policy outcomes, revealing that interests do not determine policy on their own.

Institutional explanations also fall short of a complete justification. Japan's approach relies on a fragmented set of programs, including the TITP and the Specified Skilled Worker system, both of which are structured to limit long-term settlement and restrict pathways to permanent residency (Chung and Hosoki, 2017). In contrast, South Korea developed the Employment Permit System, a coordinated framework that centralizes foreign labor recruitment under state management (Seol, 2012; Chung et al., 2024). This highlights that institutions themselves are the product of political decisions and reflect the underlying preferences of the elites who designed them (Hwang, 2016). Thus, explaining why Japan and South Korea built such different institutions requires looking upstream, at the ideational context in which those decisions were made.

Ideas about national identity provide the most compelling explanation for the divergence between the two cases. National identity shapes how policymakers interpret demographic challenges and defines the boundaries of what solutions are politically conceivable. In Japan, national identity has historically been constructed around ethnic homogeneity and has been the framework which continues to constrain contemporary policy debates (Oguma, 2021; Liu-Farrer, 2020). Their self-conception has led policymakers to treat immigrants simply as a means to an end, rather than a long-term demographic solution. Migrants are incorporated as workers, but excluded from full social membership, preserving the perceived cultural integrity of the nation. Thus, this results in a policy architecture built to ensure that foreign labor does not become foreign settlement (Oishi, 2012).

In South Korea, ethnic nationalism has also been historically prominent, but it has shown greater flexibility in the face of economic and demographic pressure. Shin et al. (1999) notes that Korean nationalism, although rooted in ethnic identity, is not immutable. Political elites have progressively reframed migration as an essential component of economic development, integrating it into a broader developmental-state logic, instead of treating it as a threat to their national cohesion (Chung et al., 2024; Wong, 2004). This shift can be seen through the design of their Employment Permit System and in the rise of multicultural family discourse, both of which signal a managed expansion of national boundaries (Lim, 2013). South Korea has not abandoned its ethnic nationalist foundations so much as reinterpreted them in ways that accommodate labor migration and maintain social stability. This ideational flexibility is absent in Japan and that can directly explain why such similar interests and similar pressures produced such different institutional outcomes.

Methods

For this paper, I used a multi-method comparative case study design to examine why Japan and South Korea, despite facing nearly identical demographic and economic pressures, developed divergent migration policy regimes. My analysis uses three types of evidence: quantitative demographic and migration data, qualitative comparative case analysis, and a text analysis of elite political discourse in each country.

The quantitative component draws on data from the World Bank and the Organization for Economic Co-operation and Development (OECD) to establish the structural conditions shared by both countries. Fertility rate trends from 1960 to 2023 are sourced from the World Bank Development Indicators (World Bank, 2023), and foreign-born population share and annual migration inflow data are from the OECD International Migration Database (OECD, 2023). These indicators are used to demonstrate that structural pressures were virtually the same across both cases, establishing the argument for an idea-based explanation rather than interest-based.

The qualitative component consists of a comparative case analysis between Japan and South Korea. The two countries were selected because they represent the most-similar system design. As mentioned above, Japan and South Korea share comparable levels of demographic decline, economic development, regional position, and employer demand for migrant labor, yet produced different policy outcomes (Chung and Hosoki, 2017; Hwang, 2016). Therefore, this design allows for the controlled comparison of ideational and institutional variables, while holding structural conditions relatively constant. Evidence is drawn from secondary scholarly sources on migration policy, national identity, and developmental state theory, including peer-reviewed work by Oishi (2012), Seol (2012), Lim (2013), Oguma (2021), Liu-Farrer

(2020), and Chung et al. (2024), as well as government policy documents and relevant news articles.

The word cloud text analysis is used to examine the language of official government documents, institutional policy texts, and elite political discourse related to migration policy in both countries. The Japanese corpus consists of five documents covering the period 2018 to 2026, including a 2018 Mainichi Shimbun report on Prime Minister Abe's Diet statements on immigration reform, a 2026 policy analysis of Japan's foreign worker framework, a 2026 Japan Times report on undocumented foreign workers, and two official government program descriptions from the Immigration Services Agency of Japan and the Japan International Trainee and Skilled Worker Cooperation Organization (JITCO). The South Korean corpus consists of five documents covering the period 2003 to 2025, including the Act on the Employment of Foreign Workers from the Korea Legislation Research Institute, an overview of the Employment Permit System, a Global Skill Partnerships EPS policy summary, an International Labor Organization assessment of the EPS, and a 2025 ministerial address by the Minister of Employment and Labor delivered at the Seoul Foreign Correspondents Club. My analysis focused on the frequency and prominence of terms including "temporary," "trainee," "intern," and "foreign" in the Japanese corpus, and "employment," "permit," "employer," "business," and "rights" for South Korea.

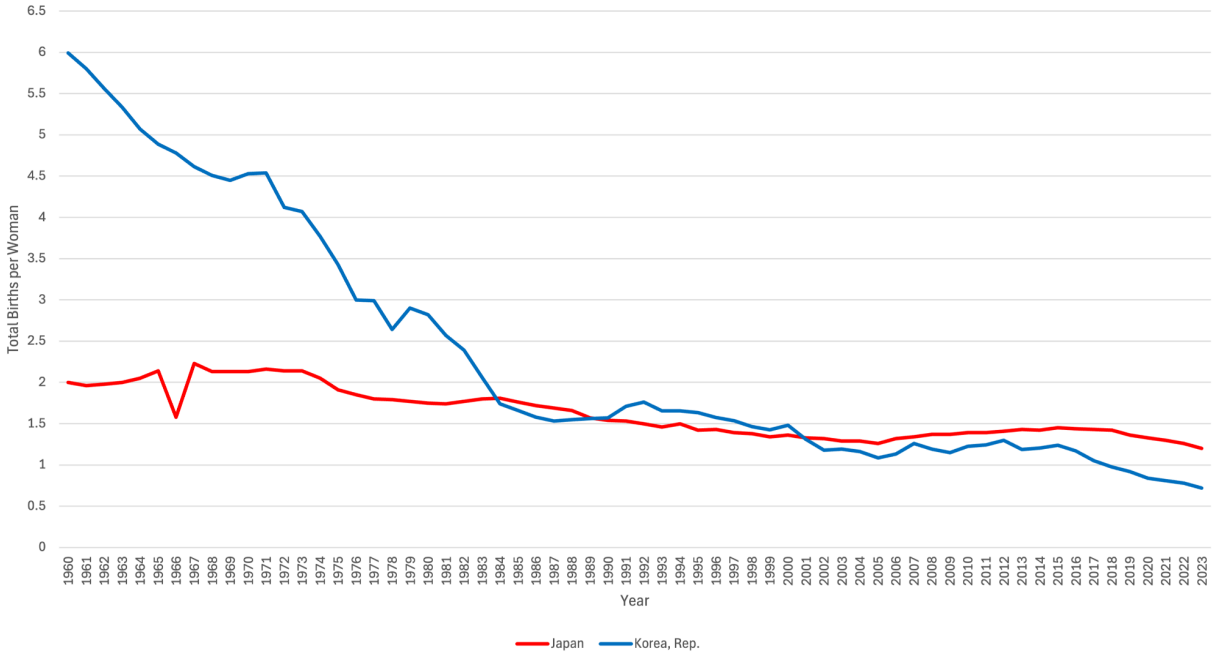
Quantitative Evidence

Before examining how national identity shaped migration policy in Japan and South Korea, it is necessary to establish that both countries faced similar structural pressures. The quantitative evidence presented in this section uses World Bank fertility data and OECD

migration statistics to demonstrate that demographic decline and labor demand were very similar between the two cases.

Figure 1

Declining Fertility Rate in Japan and South Korea from 1960 to 2023



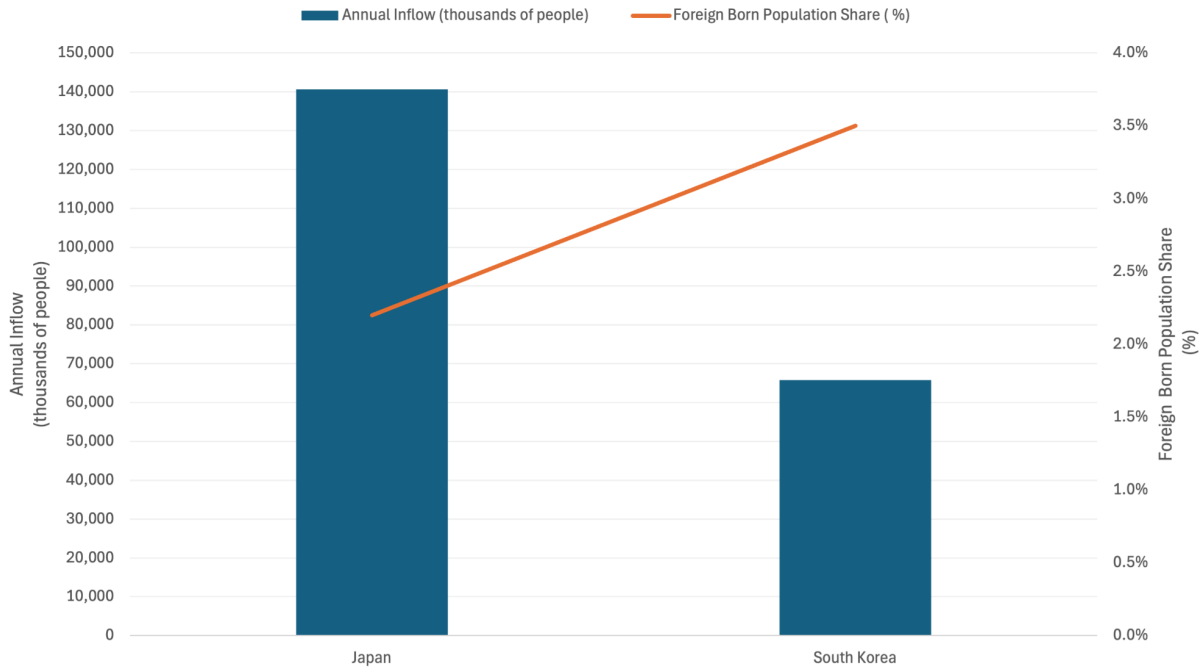
Note. This figure shows the total fertility rates (births per woman) for Japan and South Korea from 1960 to 2023. Data sourced from the World Bank Development Indicators (World Bank, 2023).

Figure 1 presents total fertility rates for Japan and South Korea from 1960 to 2023. In 1960, Japan recorded a fertility rate of 2.00 births per woman while South Korea recorded 5.99. By the mid-1980s the two countries had converged, with Japan at 1.76 and South Korea at 1.66 in 1985. From that point forward both countries' fertility rates were very close and declined together, falling below the replacement threshold of 2.1. By 2023, Japan's fertility rate had reached 1.20 and South Korea's had fallen to 0.72, which is the lowest recorded fertility rate of any country in the world (World Bank, 2023). The convergence of these trajectories after 1985 is

important because it means that for the past four decades, both countries have faced nearly identical demographic pressures, making fertility decline an unlikely explanation for their divergent policy responses.

Figure 2

Migration Inflow and Foreign-Born Population Share in Japan and South Korea



Note. This figure shows the annual migration inflow (number of people) and foreign-born population share (percentage) for Japan and South Korea as of 2022. Annual inflow and foreign-born population share data sourced from the OECD International Migration Database (OECD, 2023).

Figure 2 presents the annual migration inflow and foreign-born population share for Japan and South Korea as of 2022. Japan recorded an annual inflow of 140,579 migrants and a foreign-born population share of 2.2%. South Korea recorded an annual inflow of 65,731 migrants and a foreign-born population share of 3.5%. This shows that Japan admits more than twice as many migrants annually as South Korea, yet retains a lower foreign-born population

share. This gap is not just the result of differences in population size. It reflects the structural logic of each country's migration regime. Japan's programs are deliberately designed to prevent long-term settlement for their migrant workers. They cycle migrant workers in and out without allowing them to accumulate residency or contribute to a permanent foreign-born population. On the other hand, South Korea's Employment Permit System, although it is also temporary by design, has produced a higher foreign-born population share because of its standardized contracts and bilateral government agreements, which creates a more stable and visible pathway for workers to remain (Seol, 2012; Chung et al., 2024). Together, Figures 1 and 2 establish the empirical foundation of the paper's most-similar systems design. Both countries face the same demographic crisis. Both admit high amounts of migrant workers. Yet one country has built a regime that quietly absorbs foreign labor into its population while the other has built a regime that just expels it.

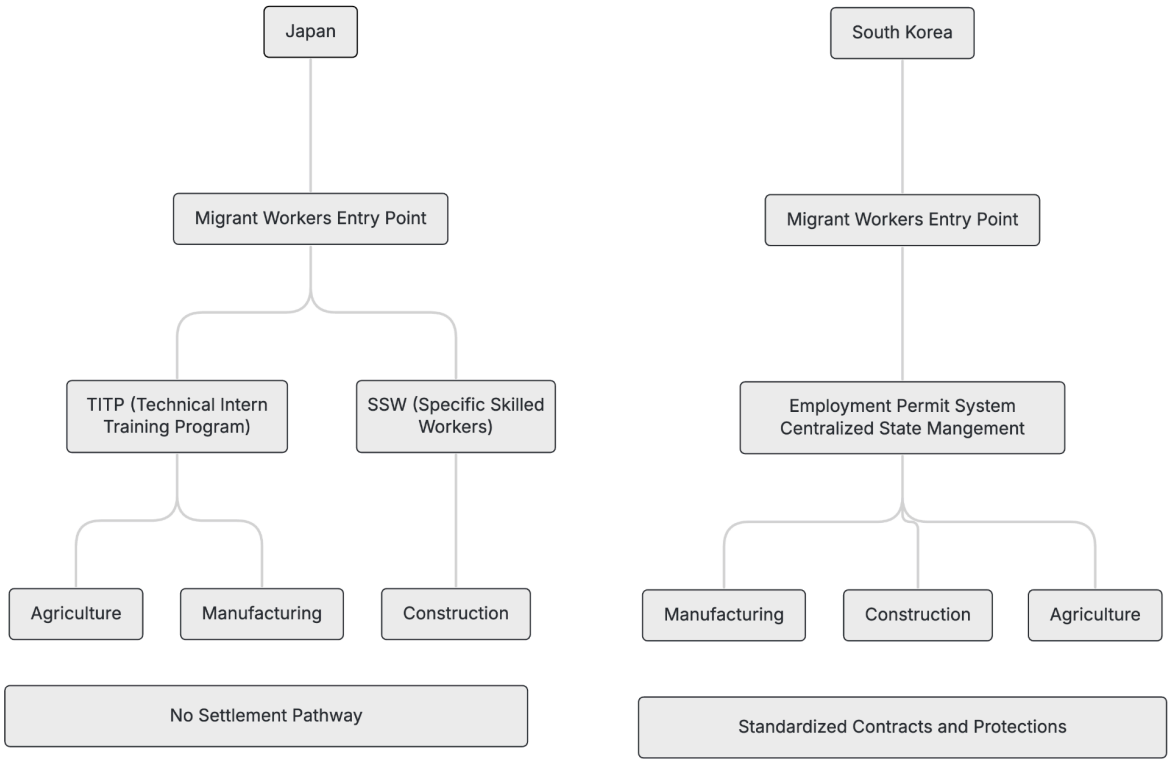
Qualitative Evidence

Japan and South Korea represent most-similar cases in terms of economic development, regional position, and demographic pressure. This allows for isolating the role of ideas in shaping migration policy. The quantitative evidence in the preceding section established that structural conditions were nearly identical across both cases. What differed between cases was the ideational lens in which those conditions were interpreted, and therefore the institutional forms that have resulted.

Case Study 1: Japan

Policy Structure

Figure 3
Comparative Institutional Structure of Migrant Worker Entry Programs in Japan and South Korea



Note. The diagram above illustrates the entry pathways, program structures, and settlement outcomes for migrant workers in Japan and South Korea. Japan's system operates through the Technical Intern Training Program (TITP) and Specified Skilled Worker (SSW) visa with no settlement pathway. South Korea's system operates through the centralized Employment Permit System (EPS) with standardized contracts and worker protections. Adapted from Chung and Hosoki (2017) and Seol (2012).Japan's migration regime is organized around two primary programs: the Technical Intern Training Program (TITP) and the Specified Skilled Worker (SSW) visa system.

As Figure 3 illustrates, both programs channel migrants into agriculture, manufacturing, and construction without providing meaningful pathways to permanent residency or long-term settlement. The TITP, established in 1993, classifies foreign nationals as trainees acquiring skills for transfer to their home countries rather than as workers filling structural labor gaps (Chung and Hosoki, 2017). The SSW visa, introduced in 2019, created a formal category for skilled foreign labor, but capped stays at five years for SSW(i) holders and restricted family reunification (Chung and Hosoki, 2017). Japan's migration policies have consistently focused on temporary labor without long-term settlement (Oishi, 2012), and this orientation has remained across decades of demographic decline and labor shortage.

Elite Discourse

Figure 4

Word Cloud: Japanese Migration Policy Corpus

Note. This word cloud was generated using Voyant Tools from a collection of five Japanese government documents and elite discourse sources from 2018 to 2026. The corpus includes

official program descriptions from the Immigration Services Agency of Japan and the Japan International Trainee and Skilled Worker Cooperation Organization, and media coverage of Diet debates. The word size in the word cloud reflects term frequency across the corpus.

The language in which Japanese political elites have framed migration is as revealing as the policies themselves. During the 2018 Diet debates over the revision of the Immigration Control Act, Prime Minister Abe's administration explicitly stated that the new system did not constitute an immigration policy (The Mainichi, 2018; Nippon.com, 2026), drawing a firm boundary between labor recruitment and permanent demographic change. The framework of admitting workers while categorically denying that immigration was occurring, reflects a pattern that the Japan corpus word cloud makes visible. In Figure 4, the most prominent terms across Japanese government documents and elite discourse on migrant workers and policy is "technical," "training," "intern," "supervising," and "foreign." The dominance of the words “trainee” and “training” reflects a deliberate strategy that classifies migrants by their temporary function rather than their social presence. Migrants are incorporated as workers but not as members of society (Liu-Farrer, 2020), and the idea of Japan as a homogeneous nation remains deeply embedded in how policymakers define the boundaries of legitimate membership (Oguma, 2021). Japan's commitment in maintaining a temporary migration model despite consistent demographic decline demonstrates that structural pressures alone do not determine policy outcomes. Rather, they are filtered through deeply embedded ideas about national identity. Japanese elites do not view labor shortages as a justification for immigration-led demographic change, but instead as a problem to be managed without fundamentally altering the composition of the nation. Even when policy expands, as with the SSW system, institutional design continues to restrict settlement and family reunification, indicating that reform occurs within ideational

limits Japan's migration regime is structured to align with an enduring belief in ethnic homogeneity, demonstrating how ideas actively constrain the range of politically acceptable solutions even in the face of labor demand.

Case Study 2: South Korea

Policy Structure

South Korea's migration regime is organized around a single, centralized framework: the Employment Permit System (EPS). It was introduced in 2004 and administered by the Ministry of Employment and Labor (Seol, 2012). As Figure 3 illustrates, the EPS channels foreign workers into manufacturing, construction, and agriculture through bilateral government-to-government agreements with sixteen sending countries, providing standardized employment contracts and extending South Korean labor protections to migrant workers (Ministry of the Interior and Safety, Republic of Korea, n.d.; International Labour Organization, 2015). The EPS represents a state-led system to manage foreign labor inflows in a manner that is transparent, regulated, and integrated into broader economic planning (Seol, 2012). Unlike Japan's fragmented programs, the EPS consolidates recruitment, placement, and oversight under a single institutional framework, which is a fundamentally different understanding of what migration is and what it is used for.

Elite Discourse

Figure 5
Word Cloud: South Korean Migration Policy Corpus

Note. This word cloud was generated using Voyant Tools from a collection of five South Korean government documents, institutional policy texts, and elite political discourse sources from 2003 to 2025. The corpus includes the Act on the Employment of Foreign Workers, the official Employment Permit System overview, and a 2025 ministerial address by the Minister of Employment and Labor. The word size in the word cloud reflects term frequency across the corpus.

South Korean political elites have consistently framed migration as an economic necessity rather than a cultural threat. The South Korean state incorporated labor migration into its developmental strategy as a tool for sustaining growth in labor-intensive industries (Chung et al., 2024), and this framing is reflected in how the EPS was designed and justified. States adapt institutions to sustain economic growth (Wong, 2004), and South Korea's approach exemplifies this logic because the EPS was presented as a rational management tool for addressing specific sectoral shortages. The South Korea corpus word cloud, presented in Figure 5, reflects this

framing clearly. The dominant terms in the word cloud "employment," "permit," "employer," "business," "worker," "policy," and "rights" signal a discourse organized around labor management, economic function, and legal protection, not cultural exclusion or temporary presence. The words "insurance," "health," and "rights" also further reinforces that South Korean elite discourse constructs migrants as workers with recognized legal standing, a framing absent in Japan. Beyond labor management, South Korean elites have also introduced a multicultural framing that marks a meaningful, but managed, expansion of national identity. South Korea has begun to redefine itself as a multicultural society (Lim, 2013), and the emergence of multicultural family discourse in official policy signals that the boundaries of national membership have been selectively widened to accommodate migration-adjacent social realities. This reframing does not eliminate ethnic nationalism, but transforms its policy implications, allowing the state to expand labor migration while maintaining a degree of social boundary control. South Korea's case demonstrates that ideas are not static constraints, and they can be strategically adapted, enabling institutional change in response to structural pressures in ways that Japan's more rigid ideational framework does not permit.

Comparative Assessment

Through the aforementioned, it is evident that interests and institutions alone cannot explain the divergence in migration policy between Japan and South Korea. Both countries faced the same demographic pressures, both had employers demanding migrant labor, and both built institutional responses to those demands. What differed was the ideational context in which those responses were constructed. Japan's ideology of ethnic homogeneity prevented the possibility of publicly acknowledging immigration as a long-term solution, producing a policy architecture

built around the manufactured narrative of a temporary means to an end. However, South Korea's more flexible national identity framework, reinterpreted through developmental-state logic, allowed policymakers to name migration as exactly what it is, an economic necessity, and build institutions to manage it. The word clouds presented in Figures 4 and 5 make this ideational divergence visible. Japan's corpus is dominated by the words training, internship, and supervision. While South Korea's corpus highlights the words employment, rights, and business. These are not just different words for the same thing. They reflect the broader, fundamental different conceptions of what a foreign worker is in each respective country, and whether their presence in the nation is something to be managed or something to be denied.

Counterarguments

One potential explanation for the divergence in migration policy between Japan and South Korea is that the existing institutional structure drives policy outcomes. One might argue that the difference in institutional design between Japan's fragmented system of temporary labor programs compared to South Korea's centralized Employment Permit System (Chung and Hosoki, 2017), is the explanation itself for divergent migration outcomes. However, this argument is ultimately circular. Institutions do not emerge independently of the political choices that created them. The divergence in institutional design reflects how political elites in each country interpreted the demographic decline in the first place. In Japan, elites framed migration as a temporary labor supply problem, producing fragmented programs designed to prevent settlement. In South Korea, elites framed migration as a necessary economic management tool, producing a centralized system designed for orderly labor recruitment and oversight (Hwang, 2016). Moreover, institutions are outcomes of prior ideational choices rather than independent

explanatory variables. Treating them as the cause instead of the consequence simply restates the paradox in different terms.

A second counterargument is that employer interests and labor market demands are the primary drivers of migration policy. South Korea's adoption of the Employment Permit System could be interpreted as a straightforward response to the pressures from small and medium-sized enterprises facing consistent labor shortages. However, this explanation fails because it does not account for cross-national variation. Japanese firms have similarly relied on migrant labor through the Technical Intern Training Program, gaining access to low-cost workers without requiring long-term integration or rights expansion (Oishi, 2012). Thus, if economic interests were the primary driver of policy outcomes, we would expect both countries to have converged on migration regimes. However, the persistence of Japan's deliberately temporary and restrictive system despite labor demand that is structurally similar to South Korea's demonstrates that interests alone do not determine the institutional form a migration regime takes (Chung and Hosoki, 2017; Hwang, 2016). As the quantitative evidence in this paper establishes, nearly identical pressures produced divergent outcomes, which is what an interest-based explanation cannot resolve.

Conclusion

Demographic collapse does not automatically mean open borders. Japan and South Korea have spent decades watching their populations age and their domestic workforces shrink, and both have turned to migrant labor to fill the gap. But the systems they built to do so look almost nothing alike, and that is because of their ideological differences.

In Japan, the narrative of ethnic homogeneity has largely shaped policy choices. Policymakers have admitted hundreds of thousands of foreign workers while simultaneously

insisting, in legislative language and in Diet speeches, that none of it constitutes immigration (The Mainichi, 2018; Nippon.com, 2026). This has resulted in a policy regime which labels migrant workers as trainees and specified skilled workers, then sets their visas to expire and restricts their families from joining them, all in an effort to maintain a homogeneous nation (Chung and Hosoki, 2017). In South Korea, elites have made a different choice. They reframed migration not as a cultural threat but as a necessary economic instrument, embedding it within the developmental-state logic that had already proven capable of transforming the country's economy (Chung et al., 2024; Wong, 2004). The Employment Permit System was the institutional result of their ideological reframing in which foreign workers are workers with rights and contracts and legal standing (Seol, 2012).

Policymakers and international organizations often treat labor migration as the rational response to a shrinking workforce, thinking that enough economic pressure will eventually call for liberalization. Japan's case is a direct challenge to that assumption. A country can sustain four decades of below-replacement fertility rates (World Bank, 2023) and still build a migration system explicitly designed to prevent permanent settlement (Oishi, 2012), as long as its national identity framework makes that the only viable option. Moreover, when structural pressures rise, what governments do with it depends entirely on the ideas in which they consider possible. Thus, ideological change is a prerequisite for institutional change. South Korea did not build the Employment Permit System and then gradually come to accept migration as an economic necessity. They reframed migration as an economic necessity first, and then the EPS followed from that reframing (Chung et al., 2024). Scholars and advocates pushing for more migrant rights and sustainable migration governance in countries like Japan, must look beyond policy and target the national ideology in which those institutions exist.

Reforming policy by proposing new visa categories or expanding worker quotas without addressing the underlying ideology is unlikely to produce long-lasting change. Lasting reform requires a shift in how migration is publicly framed. NGOs and civil society organizations working on migrant labor rights in Japan could use South Korea as an example for legitimizing the idea that foreign workers belong as a necessity. Until policymakers, media, and the public in Japan are willing to explicitly name it as immigration, the institutions built to manage it will continue to be designed around denial rather than governance. For international organizations and bilateral partners, this means that sustained engagement with how national identity is narrated in public discourse, in education, and in political speech, is how meaningful migration reform can actually happen.

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