

LEGAL LABOUR AND CIRCULAR MIGRATION IN EU
An analysis of different initiatives in EU and the
case of the Mentor2 project between Italy,
Morocco and Tunisia

Executive summary

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The content of this document is the solely author's responsibility and does not reflect the position of the European Union or ICMPD. This document pertains to CeSPI's research activities within Mentor2. The project was co-founded by the European Union, contracted by the ICMPD through the Migration Partnership Facility.

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CeSPI research activity in Mentor2

Mentor2¹ (Mediterranean Network for Training Orientation to Regular migration) is an initiative of legal circular mobility through a **youth professional training scheme** between **Morocco, Tunisia and Italy**, involving a large international partnership² (under the coordination of the Municipality of Milan) including key stakeholders such as specialized employment agencies, public partners in the target countries, NGOs, a think tank, with the collaboration of the Italian Ministry of Labour and Social Policies.

As continuation of the previous pilot project **Mentor1**, **Mentor2** is co-funded under the *Migration Partnership Facility III* (MPF III) and managed by ICMPD (International Centre for Migration Policy Development). It contributes to the *Global Approach on Migration and Mobility* (GAMM), the overarching framework of the EU external migration and asylum policy and international cooperation, and to one of its four priorities, which is 'to better organize legal migration, and foster well-managed mobility'. The initiative is also in line with the objectives of the 2020 EU *New Pact on Migration and Asylum* which aims to develop legal pathways for third-country nationals to meet the needs of EU Member States labour markets. Mentor2 is also connected to the *Call to Local Action on Migration* launched by UCLG (United Cities and Local Governments) in 2019 to consolidate the role of local authorities in migration governance in the framework of the *Global Compact for Safe, Orderly and Regular Migration* (GCM).

Under the coordination of the think tank CeSPI, a **research activity** aiming at examining initiatives of legal/circular migration in EU was undertaken to identify and analyze **practices of legal labour mobility** between the EU and third countries. The [study](#) includes an **introductory chapter** on the EU legal migration framework, while a **second chapter** analyzes **eleven initiatives** - including Mentor2 (main characteristics, elements of strength and success, obstacles and challenges) to share good practices and lessons learned. At first, the study addressed EU initiatives similar to Mentor2 that could envisage direct participation and commitment of local authorities. The mapping exercise was later extended to other relevant labour migration and circular mobility schemes³, due to a lack of findings among EU municipalities⁴. Consequently, the study focused on **how outcomes of legal migration schemes and circular mobility** have been differently pursued, between the EU and third countries, highlighting their **constitutive elements, enabling factors and internal and external challenges**. The **methodology** included: a survey⁵ distributed within the *Eurocities network*⁶ and addressing EU cities involved or interested in labour mobility schemes, a desk review to identify legal migration initiatives between EU and third countries, interviews with key representatives of selected legal migration initiatives, a closed-door seminar to discuss and exchange lessons learned in legal migration⁷. Additionally, a **separate study** has been carried out among Italian companies involved in Mentor2 to analyze if/to what

¹ <https://mentor2.org/fr/>

² ANAPEC – Agence Nationale Marocaine de Promotion de l'Emploi et des Compétences, ANETI – Agence Nationale Tunisienne pour l'Emploi et le Travail Indépendant, the Eurocities network, APL, AFOL, ANOLF, Soletterre, Promos – Camera di Commercio di Milano, CeiPiemonte, the Municipality of Turin, the Region of Beni Mellal – Khenifra, the Municipality of Tanger, the Municipality of Tunis and the Municipality of Sfax, and CeSPI.

³ These initiatives have been selected according to a national representativeness criterium (German, Spanish, Belgian, Swiss, French case studies), and based on the existing literature review and on the indications of different experts.

⁴ An additional attempt to investigate the interest in circular/labour migration among some selected cities (Utrecht, Munich, Barcelona, Lione) has been carried out yet with little success.

⁵ Despite having been relaunched several times, the survey obtained no response (https://docs.google.com/forms/d/e/1FAIpQLScG9UnkS4mdst4kHEcXx8DmikIOW-w_35GP8lqmHTBkJyJRzg/viewform).

⁶ <https://eurocities.eu/>

⁷ 12th of December 2024

extent the recruitment of third country nationals from abroad could represent a solution to skill and labour shortages.

The debated EU approach to legal labour and circular migration

While migration is still a controversial political issue due to pressure in electoral cycles at national and at EU level, with variations among Member States, it is both an asset for origin countries and an essential resource for the EU. The political and public opinion debate is highly instrumentalized, but also overall schizophrenic, simultaneously addressing concern for incoming migrant flows as well as for labor shortages that cannot be filled with national/EU citizens.

A level of criticism on legal/circular mobility schemes highlights a discrepancy between the importance on paper to reinforce labour migration channels, and the priority given to border controls and security, revealing a growing securitarian approach to migration at EU level. Evidence⁸ comes from the tendency and preference to concentrate on the externalization of migration management, border controls, and agreements with third countries to obtain collaboration for border controls, returns and readmissions⁹. Since the EU main priority is to curb down irregular migration and scale up security, defense and returns, labour mobility pathways are firstly inscribed under this framework rather than envisaged as a long-term strategy to pursue economic growth and cooperation (ETTG, 2/2024)¹⁰. Nevertheless, as clarified in the political guidelines for the EU Commission (2024-29)¹¹ by President von der Leyen, labour migration represents one of the solutions to support the good health of EU companies and economic competitiveness: “we will support Member States and companies with legal migration based on the skill needs of our economies and our regions. We will help match the skills of third country nationals with labour market gaps in Europe and we will make it easier to attract the right talent with harmonised rules on the recognition of qualifications”. Legal migration in EU as it is today is a selective and demand driven process that needs clear, just and viable rules, legitimately vigilant and rigorous to guarantee and safeguard all players involved within a human centered approach.

While EU Member States maintain their competence to manage national labour migration flows (determining the number of labour admissions of third-country nationals), the EU has increasingly committed to expanding legal channels (offering funding facilities like the MPF, Talent Partnerships, and other instruments such as the Single Permit or the Blue Card permit). Most of the existing and fragmented initiatives of circular/legal migration in EU are nevertheless constituted by **costly pilot projects** that hardly scaled up into larger

⁸ See the von der Leyen 2024 speech on the political guidelines for the EC commission. “More secure borders will also help us to manage migration in a more structured and fair way. The Migration and Asylum Pact is a huge step forward. (...) We need a common approach on returns, to make them more effective and dignified. And we need to develop our comprehensive partnerships, in particular across our Southern neighbourhood”.

⁹ The European Council for Refugees in Exile (ECRE) criticized migration partnerships (p. 3-4) for being “too weak and for promoting the EU’s interests (cooperation with third countries to stop irregular migration; mobility limited to high-skilled migration to meet labour shortages in Europe) without offering tangible integration prospects to third country nationals (...). The Migrant Rights Network (MRN) denounced it as a “law and order” strategy where cooperation with third countries served the purpose of creating stricter border controls and visa policies rather than the integration of migrants. Frequent reference to the ill-defined concept of “illegal migration”, combined with compulsory cooperation on readmission of irregular migrants by third countries in exchange for the mobility/visa procedures for some of their nationals, highlights “the flawed perspectives on which the EU states were basing their positions.” (<https://www.statewatch.org/media/documents/analyses/no-215-gamm-state-of-play.pdf>).

¹⁰ European Think Tanks Group, The EU-Africa migration agenda realizing a new partnership, <https://ettg.eu/wp-content/uploads/2024/09/Migrations-ETTG-Brief-September-2024.pdf>

¹¹ https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf

programmes and that did not resolve labour shortages. The low implementation of circular/legal mobility instruments is also due to their **scarce integration** into national labour and migration policies, with more policy coordination needed. Above all, the human rights' centrality has to be granted to all third country nationals, including those who use safe, regular, and orderly legal channels, asylum seekers and undocumented persons that are already in the EU. A remote risk exists that – due to the complexity and time length of administrative procedures, migrants that enter legally can find themselves in an irregular situation.

Moreover, despite some exceptions, measures to fill EU shortages have been focusing more on attracting missing skills and workers to fill gaps (i.e. nurses or medical doctors), than on building stable recruitment and mobility channels with third countries (i.e. for nurses or other professions from a specific country). While the initiatives of labour mobility have demonstrated no significant impact in terms of volume of workforce mobilized, they still result in a preferable scheme (especially addressing highly skilled workers) to long-term migration due to the general anti-immigration sentiment in many EU Member States (UNU-Crisis, 2021)¹². An additional aspect to be further discussed attains to the definition of what a highly skilled worker or a talent is in different countries and contexts.

Moving away from the project/pilot approach (which is still good and necessary to understand enabling factors, challenges and good replicable practices and methods), fair and clear mechanisms and rules at EU/Member States level are needed. Human labour mobility to reduce existing/forecasted shortages has to happen without hindering economic and youth employment growth in third countries and without causing a drainage of key competences (either low, medium or high). To respond to these challenges, **the Global Skill Partnership**¹³ model is increasingly promoted for its assumed capacity to address imbalances, avoid brain drain and support the development of origin countries. This approach can link migration labour selective policies with international cooperation and development policies, giving centrality to the country-of-origin negotiation capacity to avoid brain drain consequences. Different legal mobility initiatives are currently inspired by this model centered on skill shortages, youth training and employability, but implementation challenges exist (matching needs, sectors, profiles, titles, competences, trainings among different countries and contexts).

Nevertheless, developing and offering programmes and mechanisms that promote legal migration (as with the incoming initiatives of the Talent Partnerships, Talent Pool, Thamm Plus etc) does not lead to a consequent increase in legal migration (as demonstrated by obstacles in terms of bureaucratic and administrative burdens or complexity in existing procedures).

As the need to increase and improve the availability of feasible legal migration channels and labour entry schemes has become imperative in the EU, a certain change in the dialogue between EU/Member States and third- countries over the years can be observed. Initially focused solely on preventing irregular migration and facilitating readmissions, partnerships today see many origin countries negotiate labour mobility agreements taking into greater consideration diasporas' contributions, nationals' skills and qualifications development and workers' rights protection, in addition to their sustained interest in remittance flows.

Mobility scheme negotiations have to be based on: sound labour market assessments in an agreed balance between skills and competences needed and offered; selective, technical and life-skills pre-departure

¹² <https://cris.unu.edu/sites/cris.unu.edu/files/WP21.03%20-%20Rahim%20Rayp%20and%20Ruysen.pdf>

¹³ Based on a pre-migration agreement, it engages governments and private-sector players. The agreement is demand-driven by the employers in the destination country. The partners identify common key economic sectors affected by skill shortage; the training of skilled professionals is supposed to employ these workers in both destination and origin country (<https://gsp.cgdev.org/>)

trainings; decent and fair regular working conditions and integration support in the destination country/territories; safeguarding migrant workers' rights; back-and-forth movements and reintegration (including investments, entrepreneurship, certified qualifications and acquired competences). Many origin countries also started addressing welfare policy aspects (and developing or providing services) related to social protection, insurance, pensions.

EU countries are now competing with other players and countries (on the demand side) on the global recruitment market, and the negotiation can be more favorable for countries on the manpower offer side. At the same time, a long-term perspective and regional EU strategy responding to internal collective and national shortages (of skills, labour and population) is required as a political responsibility although this may be challenged and confronted by a securitarian approach to migration. A need for institutional cooperation is essential as migration management requires national and European political competences and coherent decisions involving different Ministries (Social affairs, Employment and Inclusion, Interior and Foreign Affairs). Initiatives such as Mentor2 are an institutional test to concretely verify the feasibility of a norm for legal mobility and the feasibility of multi-stakeholder and multi-country governance for recruiting, matching and training foreign workers. Mentor2 offers clear evidence of the need to further develop policy instruments, removing obstacles and offering fair, respectful and inclusive options feasible on paper and in practice.

Main findings from the study

The [study undertaken](#) offers an analytical overview of how different projects and programmes have been designed and carried out while addressing **two problems**: *labour and skill shortages in EU countries* (to be possibly reduced by considering extra-EU recruitment pools), and *irregular flows* from third-countries. While these two issues might seem to be interconnected, with labour migration pathways representing a possible response to limit irregular flows and to solve labour shortages with third country partners (according to larger MoU and agreements signed), the current analysis shows that **no universal good practice exists, and all schemes and mechanisms are differently challenged by bureaucracy, cultural constraints, private sector's mistrust or public sector's rigidity**.

The study highlights the complexity in turning pilot initiatives into orderly, regular and sustainable bilateral mechanisms. Finally, the analysis illustrates different initiatives focused either on ***circular mobility schemes*** (mainly postgraduate temporary training/return to the origin country to boost local labour force), or on ***medium-long term migration schemes*** (to compensate EU national labour shortages from a labour recruitment perspective¹⁴).

Circular (short term/back and forth) mobility schemes and labour (medium-long term) migration mechanisms are **responses to different problems** and produce diverse outcomes. ***Circular labour mobility mechanisms*** undoubtedly reinforce and increase employment opportunities especially for third country youth, both in the country of origin and on the international labour market, reducing unemployment risks, migration pressure and amplifying entrepreneurship prospects (avoiding direct brain drain risks). Additionally, ***circular mobility*** potentially helps improve positive perceptions, potential interest and exchanges between companies in EU and in third countries. At the same time (medium-long term) ***labour migration schemes*** seem to provide a more adequate response to skill shortages in EU labour markets requiring a comprehensive integration perspective. Among the main discrepancies are whether return to the origin country is mandatory or not,

¹⁴ That do not even necessarily mention the "circularity" component, being mainly interested in a long term/permanent recruitment and labour migration.

whether the temporary permit to stay can be easily transformed into a different work permit, and whether companies and foreign workers respond to each reciprocal needs and motivations.

The mobility schemes analyzed tend to positively involve large and diversified sets of stakeholders (public, private, and third sector). The potentials of a territorial multi-stakeholder approach and a multi-level governance are largely recognized by Mentor2 partners, but implementation challenges and complexities exist and they can hinder the success of such initiatives. In the mapped initiatives a direct engagement of **local authorities** (a distinctive feature of Mentor2) in EU appears today still limited and jeopardized¹⁵. An occasional interest from Regional or Municipal administrative bodies has been recorded. Additionally, the target areas of projects' intervention¹⁶ rarely refer to the city dimension, more easily addressing national and regional levels. While local administrations are key actors, especially committed to promoting the integration process in the EU, their contribution to designing and implementing labour mobility schemes and to mainstreaming migration into prominent local development sectors is still partial and in fact beyond their mandate. Their commitment should be encouraged by improving exchanges with public authorities at national level along a medium-long term perspective and multilevel governance, by developing national policy frameworks clarifying their migration mandate and responsibility, and by reinforcing horizontal dialogue and discussion with their extra-EU counterparts.

Regardless of the institutional and administrative diversity among EU Member States and between them and third countries, stable and practicable national **policy frameworks** are needed within medium-long term negotiated **partnership** agreements including: clear normative national/regional/local **regulations** (granting quota provisions and timely procedures), an improved **private sector** selection and direct involvement ensuring the practical feasibility of mobility measures, the contribution of **education/training institutions** and national **employment agencies** in the origin country, that should not be merely recruitment pools, but hubs for quality human capital formation. Other public/private sector stakeholders (local authorities, no-profit and diaspora organizations, private sector collective representatives) are crucial key intermediators to ensure human and workers' rights enforcement, migration-integration successful outcomes, and local win-win effects (forecasting and avoiding negative brain drain and social dumping consequences). A flexible multi-level governance is the outcome of all these ingredients and the required dimension for any project or policy implementation.

LESSONS LEARNED: ELEMENTS OF SUCCESS AND CHALLENGES FROM ELEVEN LABOUR MOBILITY INITIATIVES FOR LIKELY REPLICABILITY

Within the research activity undertaken by CeSPI, eleven initiatives of legal labour and circular mobility in EU were analysed (desk research interviews, a seminar to exchange good practices). Lessons learned were identified and are here presented to offer inspiration for future initiatives or to review existing ones. In general terms, the contexts and conditions of implementation can be very different and might not always be replicable (for instance country differences exist in terms of wages offered, language skills required, integration and cultural aspects, private sector response etc.). While all initiatives have been successful in some areas, no initiative presented only positive results, facing challenges of different nature.

¹⁵ Despite the Spanish MOVE GREEN project with the involvement of Andalusian Municipalities Fund (FAMSI).

¹⁶ In terms of placement on the labour market/professional training/recruitment/companies' engagement.

1. Build legal mobility frameworks and obtain governance and institutional engagement of EU-Member States (granting the timely feasibility of administrative arrangements and procedures and identifying risk and feasibility factors that might require some flexibility).
2. Negotiate and obtain the country-of-origin Government's commitment. A result-oriented institutional engagement in the EU and in the origin-country shall be ensured in all phases. In addition to the Governments' involvement, close cooperation is needed with universities, vocational training centres and companies and business associations in the key sectors.
3. Raise awareness and involve different stakeholders in both origin and destination countries, including diaspora for its capacity to support newcomers in destination countries. Invest in committing and training all stakeholders, in origin and destination countries, on all labour migration aspects
4. Define key sectors, professions and profiles and manage the reintegration process (that can take place in short-medium or long term – including social security rights' portability). An in-depth context specificity analysis is crucial as it may affect results sustainability, including countermeasures and remedial actions.
5. Properly identify recruitment pools and involve training/education centres
6. Face the challenges of bureaucracy and timely address title recognition/certification issues, find ways to speed up and ease procedures
7. Carefully manage pre-departure activities, candidates' expectations and integration issues (language knowledge is crucial as well as cultural awareness)
8. Engage the private sector in the destination country (clearly facilitating the demand-labour matching, and addressing multi-cultural and language aspects as well as housing issues)
9. Stimulate and reinforce local authorities' involvement to increase the sustainability and impact of migration, employment and integration. EU local authorities' role has to be clearly defined according to their direct competences on migration management, available capacities and resources, existing relationships with third-country peers and with local labour market stakeholders.

More and detailed information is available in the online CeSPI's document "[Labour Mobility Initiatives between the EU and Third Countries](#)", A. Ferro, 2024

Mentor2: a circular labour mobility initiative between Italy, Morocco and Tunisia

MENTOR2 AND THE ITALIAN "ARTICLE No. 27" FOR PROFESSIONAL TRAINING OF THIRD-COUNTRY NATIONALS: FROM POLICY TO PRACTICE

Mentor2 is a circular mobility initiative funded under the EU MPF III (Migration Partnership Facility III) targeting 41 young highly qualified persons from Tunisia and Morocco to accomplish 6 months of professional training in two Italian Regions - Lombardy (Milan) and Piedmont (Turin). The return option was not mandatory.

Italy currently promotes several policy measures of active employment; traineeships are an active policy measure, aimed at creating direct contact between employers and trainees. In Italy, internships are a tool for school-work transition and an employment measure with the intermediation of specialized registered agencies. The Regional administrative level is the main reference to manage professional trainings.

Within the Italian Immigration Act (*Testo Unico*), **Article 27** (D.Lgs. 286/1998, art. 27, co.1, lett. F) offers **professional training opportunities in Italy for non-EU citizens**¹⁷. Within this mobility scheme, 7.500 entries for courses to get a certification or a degree and 7.500 entries for professional training/internships under the regional guidelines have been planned (2023/2025). In the previous three-year period, this measure had been under-used with only 3.219 persons admitted compared to the 15.000 quotas forecasted. Permits to stay for study/training reasons can now be converted into work permits, out of national work quotas¹⁸.

Each Region differently regulates specific aspects of Article 27: for example, the Lombardy Region (DGR No. 4732, 22nd of January 2016) applies only to newly graduated students (within one year from their graduation in the third country) and requires companies with at least 6 employees (with permanent contract). The Piedmont Region has no similar limitations.

Mentor2 applied **Article 27** as a circular labour mobility scheme between Morocco, Tunisia and Italy (Milan and Turin). The candidate profiles were identified in different areas in **Morocco** (Béni Mellal–Khénifra, Tanger) and in **Tunisia** (Tunis and Sfax) with the support of two Italian NGOs operating there (Soletterre and Anolf) and the commitment of the national public employment agencies (ANETI and ANAPEC). On the Italian side, the candidate hosting enterprises applied to a public call with the support of Promos (agency of the Chamber of Commerce in Milan) and CeiPiemonte (that offers services in the field of internalization and diversity management). Two employment agencies in Italy (AFOL and APL) were involved in the matching and training monitoring phases. The joint **matching process** between candidate profiles and hosting companies tried to take into consideration the **economic vocation of each territory**, making value of the professional profiles. Nevertheless, because Mentor2 was not designed with a focus on specific occupations or sectors, training opportunities offered by the Italian companies participating in the project basically determined the selection process. 100% of the trainees prove **highly educated**.

In Turin, the automotive industry – also flourishing in Tangeri-Tétouan-Al Hoceima, absorbed most of its traineeships' positions. In Milan, with its service oriented urban economy, the trainees were hosted in a variety of businesses (for instance, in a social enterprise, a municipal company, IT and automotive companies, communications etc.). Some territories in Morocco and Tunisia branded by an agricultural vocation could not find perfect correspondence with the two Italian city economies and labour markets.

Overall: **38 companies** were involved (19 in Milan and 17 in Turin) and **41** young boys and girls were trained. At the end of the project, **29 trainees** remained in Italy (October 2024). As for the post training phase, most trainees received a financial support to start entrepreneurship projects (11 persons) and to improve their employability (28 persons). Despite the different outcomes and personal trajectories, trainees gained a significant life and work experience through their professional internship, they improved Italian language knowledge as well as soft skills (that in many cases represented an obstacle during their stage – highlighting the importance of pre-departure preparation, including both language and life skills).

Despite the abundant **administrative challenges** faced (length of the procedures for title recognition and visa/permit to stay entitlement, compliance with the rigid regional requirements), the project positively managed the trainings. The project established **direct relations and dialogue** with the national employment agencies in Morocco and Tunisia, highlighting the important effort to build a multi-country and multi-stakeholder governance and network, despite some asymmetries between peers. In some cases,

¹⁷ Some recent changes were introduced based on the so-called *Decreto Cutro* - DL 20 of March, n. 23 turned into law the 5th of May 2023, n. 50 (<https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legge:2023-03-10;20!vig=2023-06-23>).

¹⁸ <https://integrazionemigranti.gov.it/it-it/Ricerca-news/Dettaglio-news/id/3301/Conversione-del-permesso-di-soggiorno-da-studio-a-lavoro-Cosa-e-cambiato-con-il-decreto-Cutro>

organizational asymmetries emerged (between national and local scales). While the project **improved awareness** about Article 27 especially among the Italian private sector, Article 27 as a **channel of legal labour migration** and/or as a tool to **reduce skill/labour shortage** in Italy underlined existing difficulties and obstacles. In terms of policy recommendations, Mentor2 registers that **improved harmonization and simplification** are needed, due to the administrative and bureaucratic burdens, heterogeneity in regional regulations and complexity of title recognition procedures. Due to its **administrative complexity** and time requirements, the **private sector** is not able to autonomously apply Article 27. A time discrepancy exists between companies' decisions and labour needs and the length of administrative processes. If attracting talents is the objective of legal mobility schemes and policies, the reality-check contradicts the expected outcomes.

Nevertheless, the potential of Article 27 and the higher win-win manifestation of circular labour migration can be particularly identified in **certain company profiles**: import-export companies, or companies with subsidiary branches abroad, or companies with commercial partners or strategies abroad. The business nature of these companies between Italy and Morocco/Tunisia requires workers who can link and connect the two national contexts with back-and-forth movements. The test with highly skilled workers (that improved their CV, life and professional experience, gained different competences that can be valuable in both origin and destination labour markets) shall find application also for other profiles.

Additionally, one of the key positive contributions of Mentor2 refers to its **multilevel governance** and diversified partnership engagement among the three countries and six territories involved. This originates in a territorial approach aiming to create horizontal dialogues and shared objectives (youth employment, equal and safe mobility, development) among peers. The ambition of this goal goes hand in hand with the complex challenges for its implementation.

CIRCULARITY WITHIN THE MENTOR2 PROJECT

The Mentor2 project aimed at matching skills of third country nationals with labour market needs in Italy, implementing mobility schemes for young graduates and workers from Morocco and Tunisia. According to its objectives: “Mentor2 intends to pursue a wider approach of circular migration, stimulating the trainee to become promoter of socio-economic relations and mutual development between the territories involved also in a longer perspective, beyond six months Internship” (project document). Circular mobility has been linked to **territorial development cooperation** and based on an **equal partnership framework approach** between Italy, Morocco and Tunisia. Because the Mentor2 project did not include a return conditionality after the training, as this could represent an incentive for the private sector and since the normative allowed to do so, trainees were able and free to consider any post-project opportunity – in line with their legal permit situation.

In the final phase of the project activities, **circularity did not appear as a likely option** for the majority of trainees: due to legal and administrative restrictions linked to the trainees permit to stay, back and forth movements are de facto discouraged. The lack of appealing reinsertion opportunities in the origin country together with personal work and life aspirations contributed to a diffuse preference to extend the permanence in Italy, whose duration depends on the individual capacity to look for employment, the commitment of employer companies, and the possibilities granted by the legal framework. Out of the 41 trainees, 12 persons returned to their home country, while 29 remained in Italy: more specifically 20 Tunisian persons and 9 Moroccan persons (October 2024), thanks to the extension of the apprenticeship in the same company or to new employment opportunities.

Circular mobility can therefore be stretched along a longer and more fluid outlook, resulting from the interaction between **personal ambitions**, an assessment of existing **labour opportunities** (in Italy and in the origin country), and **legal mobility possibilities**. Circularity can therefore last more than 3-12 months (as by technical definition), turning into a longer migratory experience including occasional back-and-forth movements or permanent returns later in time, making clear that circular mobility is promoted as a vehicle to transfer skills and competences and to contribute to development without time boundaries. **Mobility expectations** are therefore clearly anchored to the legal opportunities offered by the permit to stay in use, by the labour market attractiveness and general socio-economic stability (in the origin and destination countries) and by the individual evaluation regarding if and how the work experience abroad impacts on career paths and life chances.

THE ROLE OF LOCAL AUTHORITIES

Local authorities are not a frequent partner within labour mobility initiatives – excluding the FAMSI/Move Green project in Spain and Mentor2.

From the analysis of other EU labour mobility initiatives, the limited engagement of local authorities is often explained by the **central institutional responsibility in migration and labour employment**. The role that local authorities can play in labour mobility may be more significant when framed within the *Global Skill Partnership*¹⁹ model (as in the Belgian Palim project). This process requires however a long time to establish links and connections between public and private actors (in both origin and destination countries) and, more importantly, in building clear agreements on labour training, recruitment and mobility between governments, involving also municipalities. In some cases, exchanges between local authorities in origin and destination countries have been established to learn how public services are differently addressing and managing specific sectors (like sustainability and renewable energy for FAMSI/Move Green). As a matter of fact, the Municipality of Milan is among the founders of the Mayors Migration Council - to promote dialogue and exchanges on the role of cities in the international agenda on migrations, and among the promoters of the Mayors Dialogue on Growth & Solidarity that gathers almost twenty large European and African cities interested in discussing innovation and concrete solutions for human mobility. Nevertheless, CeSPI's attempt of investigation among other EU cities²⁰ shows that not only are they very rarely involved in labour mobility, but their lack of direct competences and mandate can limit or discourage their commitment.

In Italy, local authorities have no direct competences, responsibility or institutional mandate in human mobility management, third-country labour employment quotas or professional traineeship. On the contrary, municipalities have a large experience in international cooperation/decentralized cooperation on the one side, and in local migrant integration and inclusion, on the other side, being at the forefront in facing the needs of their local population. Cities represent overall the most suitable observer of the impacts of manpower international mobility on the local economy (including also their capacity to be directly aware of territorial labour needs of the private sector due to their proximity and knowledge of the local context). Moreover, a critical aspect for large parts of the migrant population in Italy refers to housing issues, where Municipalities can potentially play a significant role. Municipalities can more easily than national authorities experiment new paths, as the way in which cities can put together and work with different stakeholders in their territories is more flexible.

While there are high potentials and a great significance in involving public authorities in origin and destination countries on migration management issues, initiatives led by local authorities appear to have a low capacity to impact national/regional policies on innovative models of migration governance. Many are the challenges for cities willing to manage similar initiatives, but multilevel partnerships have to include also local authorities. Mentor2 has represented an opportunity to test local authorities' direct commitment to legal labour mobility schemes, within an extended development cooperation perspective. One of the results of the project refers to the agreements that the Municipality of Milan signed with the Municipality of Tanger (drafting also an agreement with Sfax which still needs to be signed) and the Municipality of Turin signed with the City of Khouribga. Additionally, the Regional Council of Beni Mellal Khenifra has included migration among its key areas of interest.

The Mentor2 model highlights the importance to keep building dialogue and partnerships between peer institutional and non-institutional actors, with outcomes that are under their direct capacity and competence. Measures and mechanisms to favor urban and transnational migration governance need nevertheless further experimentation, requiring a renewed more supportive legal and political frameworks and mandates.

THE RECRUITMENT OF THIRD-COUNTRY NATIONALS AS A POSSIBLE SOLUTION TO SKILL AND LABOUR SHORTAGE: A SURVEY AMONG MENTOR2 COMPANIES

Within the Mentor 2 project, CeSPI undertook a study (2024) aimed at analysing if/to what extent the **companies involved in Mentor2 experience skill/labour shortage** and whether the recruitment of profiles from third countries could be a possible solution, and/or if it can facilitate **internationalisation** or **sub-contracting** business strategies.

The research highlights that **the recruitment of professional profiles from third countries today is not a widely used** or a envisaged practice to face skill/labour shortage. However, the recruitment of profiles from third countries also appears as potentially viable and valid depending on certain facilitating conditions.

A first element concerns the **size and structure of the company**: the more cosmopolitan and open to global markets the company is, the more margins for success exist. The more the company is concretely interested in opening up to **foreign markets** (internationalisation, trade, sub-contracting), the more tangible is the added value of recruiting persons from target countries.

Managing the recognition of qualifications and competences is a key aspect that implies the presence of efficient **intermediation bodies**.

Apprenticeship can respond both to **fostering circular mobility** and to strengthening candidates' skills. Making **intentions and goals clearer** on both sides can be helpful, while leaving **room for flexibility** during the course of the action.

The more the **matching process** between companies' needs and the characteristics of candidates is **participative** and the clearer expectations and working conditions will be, the more satisfactory the outcomes will be.

Adequate preparation is necessary for both companies and candidates, in terms of mutual knowledge, practical-logical aspects as well as personal and socio-cultural dimensions.

Bureaucracy is an enemy for businesses and public and private entities. No enterprise can adapt to the time-consuming bureaucracy (for visa, permits, certifications...). These aspects are a clear deterrent, making this **labour mobility channel de facto unavailable for company needs and capacity**.

More and detailed information is available in the published document [here](#): *Affrontare lo skill shortage in Italia tramite il reclutamento di profili professionali in paesi terzi*, A. Ferro (2024)

RECOMMENDATIONS FROM THE MENTOR2 FINAL NATIONAL CONFERENCE HELD IN ROME IN 2024

The Mentor2 national conference was held in Rome in March 2024 involving different stakeholders with the aim to discuss key aspects that had emerged along the Mentor2 project implementation activities.

¹⁹ <https://gsp.cgdev.org/>

²⁰ A survey was launched along the Eurocities network of European cities with no replies. Other cities demonstrating a certain interest in the topic were identified through desk analysis (Utrecht, Monaco, Grenoble, Barcelona), but no further direct information has been collected.

Several institutional actors and representatives participated: the EU Commission (DG Migration and Home Affairs), the Italian Ministry of Labour and Social Affairs, the Ministry of Foreign Affairs and International Cooperation, the Ministry of Interior, several regions such as the Lombardy Region, the Piedmont Region, the Emilia Romagna Region, and the Lazio region, the Municipality of Milan as the Mentor2 leading partner, and the Municipality of Turin, Mentor2 partner. Additionally, other panellists were invited from international organisations, representatives of the private sector including companies involved in Mentor2 or representatives from the Chamber of Commerce, as well all Italian project partners which contributed to ensuring a comprehensive discussion on circular labour migration initiatives.

A legacy of Mentor2 is an infographic²¹, produced along the duration of the project, highlighting all the steps and challenges encountered in the implementation of a regular mobility pathway for third-country nationals, using Article 27 of the Italian Immigration Law for professional training. The infographic shares the information accumulated in the course of the project and signals critical elements and alerts which can be useful for anybody aiming to replicate the procedure. The project insofar in a sustainable perspective has experimented if and how Article 27 can be used as a recruitment channel to possibly fill skills and labour shortages in Italy; it has positively established transnational networks between key actors which might differ in their mission as well as nature/levels (i.e. employment agencies acting at the national or at the regional/provincial levels) and it has drafted and signed agreements between territories/municipalities).

The main aspects which have been highlighted along the discussion can be summarised as follows:

- The national conference was an important opportunity to promote dialogue and discussion between the different government levels involved in international migration management and in testing new legal entry channels. In fact opportunities to gather all key public actors involved in circular legal mobility are often missing, while institutional participants/panellists at the conference highlighted the need to concretely reinforce a dialogue and open discussion among key stakeholders on a systematic basis.
- Representatives of Italian and European institutions underlined the coherence between the Mentor2 project and approaches and policies implemented at the Italian and European levels. Mentor2 is among the few EU initiatives that experimented a model of regular circular migration, putting local authorities in Italy at the centre of the action. Mentor2 stands out particularly for its ability to experiment an existing model of circular mobility, that could be capable to respond to labour market needs in the EU, reinforcing knowledge transfer, while possibly avoiding/reducing brain drain effects in the countries of origin.
- Institutional cooperation in Mentor2, which operated at the transnational level - despite existing asymmetries between different actors – worked well. It took some time to build trustworthy relationships between all actors that were meant to work together, but a good level of bilateral collaboration based on competences was reached.
- However, in the Mentor2 implementation phase in Italy, it must be noted that several problems were encountered in particular linked to the different regional normative and regulations (i.e. on professional training for non-EU citizens resident in third countries and to the bureaucratic complexity in administrative procedures as permits to stay/visas).
- Thanks to the dialogue launched by the conference, the Ministries involved improved their knowledge and awareness on existing complexities linked to regular and labour migration paths and on the need to further coordinate between these same institutions involved at all levels.
- The conference was also the occasion to explain some of the causes linked to the slow management procedures. The Ministry of Interior denounced that institutions suffer for being under-staffed in personnel, while all Ministries highlighted that existing complexities linked to

²¹ <https://mentor2.org/materiali/guida-al-tirocinio-per-le-aziende/> which is accessible both Italian and in French

security impose very thorough and timely controls. It appeared clear that there is a misalignment between requests and the effective needs on behalf of companies and the capacity to respond on behalf of the public administration.

- Representatives of companies involved in the Mentor2 project expressed their interest in the use of professional training schemes, but they recognised also their necessity to rely on intermediaries to manage the entire recruitment/administrative process and to reconsider the length of all procedures.
- It thus seems clear that at the companies' level there is a need, on the one hand, to 'plan' in advance in order to allow for procedures to be completed and, on the other hand, to accelerate procedures.
- Among the possible solutions suggested, the very first one which was brought up by the regions themselves, goes in the direction of simplifying and harmonising regulations on traineeships for non-EU Nationals residing abroad between the different Italian regions. Perhaps some norms need to be updated as they refer to national and international context that has changed over time.
- A second suggestion, brought up by the Ministry of Foreign Affairs, consists in the possibility to have specific periods dedicated to permits' applications for professional traineeships and the creation of a platform to better connect its offices abroad, linking these to the traineeships' process during fixed periods of the year.
- The Ministry of Labour and Social Affairs underlined the need to increase its staff and to proceed with multiannual planning, improving its ability to detect and respond to the needs of the private sector.
- The Emilia Romagna Region highlighted the positive use of Article 27 of the Immigration Law on traineeships in relationship to some key sectors and with respect to the proactivity and interest of immigrant entrepreneurs there based.

In conclusion the success of the model experimented by Mentor 2 and its sustainable perspective can be best ensured with a regional legislation adequately modified and harmonized, with administrative burdens simplified and with an extended institutional cooperation at national and transnational level, involving the private sector as well as other key stakeholders such as universities, professional training centres, and third sector.