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What is the relationship between Australian and Dutch policies on asylum?

I declare that this thesis is my own work except where indicated otherwise through proper use of quotes and references

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Abstract

This thesis is about the Australian offshore asylum processing system and the Dutch immigration policies that shape today's treatment and processing of asylum claims in both countries. In this thesis I uncover what both immigration systems dive into the political landscape of both countries to see how they are tied to far-right politics. I also apply a neocolonial lens and argue that both systems discussed in this thesis are inherently racist, Islamophobic, and have deep ties with neocolonialism. I do this by analysing Australian and Dutch government official documents, political documents, laws, and policy papers regarding asylum and migration in the last few years. My aim with this thesis is to shed light and raise awareness on the current and future threat the far-right Dutch political climate poses to migrants and refugees.

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Contents

List of abbreviations

(In order of appearance)

PVV – Partij van de Vrijheid (Freedom Party)

UNHCR – United

EU – European Union

UN – United Nations High Commissioner for Refugees

CEAS – Common European asylum system

US(A) – United States (of America)

PNG – Papua New Guinea

CDA – Critical discourse analysis

SAS – Special Air Service Regiment

CCTV – Closed-Circuit Television

VVD – Volkspartij voor Vrijheid en Democratie (People's Party for Freedom and Democracy)

NSC – Nieuw Sociaal Contract (New Social Contract)

BBB – BoerBurgerBeweging (Farmer Citizen Movement)

AMvB - Algemene Maatregel van Bestuur (executive order)

MR – Ministerraad (Cabinet or Council of Ministers)

KB – Koninklijk besluit (royal decree)

LGBTQ+ – Lesbian, gay, bisexual, transgender, queer plus community

FVD – Forum voor Democratie (Forum for Democratie

HRLC – Human Rights Law Centre

COA – Centraal Orgaan opvang Asielzoekers (Central Agency for the Reception of Asylum Seekers)

CNO – crisisnoodopvang (crisis emergency shelter)

Introduction

"Het cabinet is gevallen."

On June 3rd I discovered that the Dutch coalition party handed in its resignation and was officially declared as 'gevallen.' When I heard what the cause of the collapse was, I felt both a sense of dread and intrigue. Dread because another Cabinet collapsing over immigration could not possibly be a good sign, and intrigued because this is exactly what I was writing my thesis about. Far-right politics, immigration, and racist motivations – this would fit right in. I knew I wanted to write my thesis on the Australian offshore asylum processing system ever since I was introduced to it by Dr. Erin Wilson during one of her lectures, as the country is one of the precursors when it comes to having established a harsh deterrence-based and human rights-violating immigration system. I also knew from that moment on that I wanted to compare it to the situation in my own country, the Netherlands. Hearing the news that the Cabinet fell over immigration because it was not "strict" enough solidified my conviction that it is something that people should read and care about and that it is the right topic to write my thesis about. That is exactly what I have done, and now before you lies the result of my research.

In this thesis I will be conducting research on the Dutch government's motivations and plans to create the 'strictest immigration policy' that the Netherlands has ever had. I will be doing this to shed light and raise awareness on the current and future threat the far-right Dutch political climate poses to immigrants and refugees. I will be doing this by collecting data from governmental and political institutions and analysing them critically.

My general aim is to analyse in what ways the Netherlands is trying to keep asylum seekers, immigrants, and refugees from coming into the country and at the same time send away those that are already here, and compare and contrast this to the Australian offshore asylum processing system.

One of my objectives is fully fleshing out what Australia's 'Pacific Solution' entails and how it subjects the asylum-seekers that fall victim to this model to a kyriarchial system. It is key to understand the core of this idea in order to compare and contrast it with the Netherlands' system and to know what the consequences are for the asylum-seekers that come into contact with it.

Another objective is to connect the Dutch "strictest immigration policy ever" and the Australian offshore asylum processing system with the rising far-right political climate of both countries at hand. More specifically, I want to connect the wish to outsource migrants to Islamophobia and racism. The Dutch far-right political party PVV, led by

Geert Wilders, focuses itself on migration first and foremost, calling to close down the borders and 'reconquer the Netherlands from the migration "tsunami"' (Partij Voor de Vrijheid, 2023). Furthermore, in the PVV's election manifesto, the continuous use of 'niet-westerse allochtoon' (non-western immigrant) makes it clear that there is a distinct difference between immigrants with a non-western background compared to immigrants with a western background, for example, Ukrainians. Non-western immigrants are repeatedly blamed for issues in the Netherlands, such as criminality, the crippling healthcare system and education system, the rising taxes and prices of groceries, and the housing crisis (Partij Voor de Vrijheid, 2023, p. 6). The PVV's goals are, clearly stated, the removal of mosques, Islamic schools, and the Qur'an, as well as the reduction of the presence of Islam in the Netherlands by refusing entry to non-western immigrants (Partij Voor de Vrijheid, 2023, pp. 8).

Lastly, I want to incorporate a colonial lens to Australian and Dutch asylum processing systems, as both countries at hand have a long and complicated history regarding (settler) colonialism. My objective is to uncover how colonialism is wrapped up in the offshore asylum processing system and outsourcing of migrants to other countries and how this perpetuates colonial systems and relations between countries and peoples.

To fulfil these aims, I will answer the following research question in this thesis;

> *What is the relationship between growing far-right politics and increasingly deterrence-based asylum policies in the case of Australia and the Netherlands?*

In order to answer this rather large question, I have created three sub-questions, which each will be answered in their own respective chapters.

> *1. How does the Australian offshore asylum processing system operate and what are its consequences?*
>
> *2. How does the Netherlands handle immigration and in which ways is this influenced by the increasing far-right political landscape?*
>
> *3. In what ways are Islamophobia, racism, and neocolonialism intertwined with the Dutch and Australian motivations to outsource the migrants that attempt to cross their borders?*

To introduce the topic of the offshore processing system, I will give an in-depth explanation of what it means and entails. I will also lay out how the offshore processing system, or extraterritorial processing system, emerged and its history. In doing this, I will focus especially on how countries from the Global North (Europe, Australia, and North

America) have implemented their own versions of this system or what ideas and plans they have created and pitched. I will also give an overview of the legal background of processing asylum claims and point out how oftentimes, extraterritorial processing goes hand in hand with human rights violations. After the literature review, I will explain the theoretical and conceptual frameworks used throughout the entirety of this thesis, so it is clear what frameworks hold up my arguments. Then, the methodology will explain how this qualitative research is conducted. It will describe which sources will be used and how they will be analysed by document analysis and critical discourse analysis, as well as point out the limitations of this research project. After that, the chapters will answer the sub-questions and subsequently the research questions. In the first chapter I will outline how the kyriarchal Australian offshore asylum processing system operates to give the thesis the relative background information and international impact the Australian 'Pacific Solution' has had thus far. Chapter two will focus on how the Netherlands handles immigration, past and present. Before I can say anything about what the Dutch government *wants* to implement, it is important to see what systems have already been set up. I will especially focus on the PVV when it comes to far-right Dutch politics, as its leader (Geert Wilders) won the elections in 2023. The third chapter will encompass the overarching themes that are identified in the cases of Australia and the Netherlands regarding their immigration policies. These are deterrence-based policies and kyriarchy, racism and Islamophobia, and neocolonialism. The need to keep the borders closed for migrants is rooted in racism and Islamophobia, and the need to outsource migrants to other countries by striking up deals with their governments is something that I will argue is a form of neocolonialism. In the fourth and last chapter I will present the main argument and answer the main research question in light of the preceding research and discussion. Lastly, I will end this thesis with a conclusion and suggestions for further research.

Literature review

In this literature review, the offshore asylum processing system will be explained. What it is, how it functions, its history, and how it is implemented in different contexts. Even though this thesis focuses on the Netherlands and Australia specifically, there are many more countries that have entertained the idea of offshore processing of asylum seekers and immigrants or have even implemented it wholly or in part. These cases will be discussed to show how these systems can operate in different contexts and to remind us that this issue is not limited to Australia and the Netherlands, but it instead is a much larger one that affects many countries and therefore many migrants and asylum seekers. I will focus mainly on the Member States of the European Union, as they have made a lot of effort to move the processing of migrants beyond their borders for decades now.

Offshore processing, in the case of Australia, or external or extraterritorial processing, is the practice of processing applications for international protection beyond a country's own borders in third countries (Leclerc et al., 2024). Extraterritorial processing can take different forms. It can be limited to a pre-screening exercise on the grounds of protection safeguards, but it can also grant temporary forms of protection to particular groups of people (Refworld - UNHCR's Global Law and Policy Database, 2024). Extraterritorial processing claims to 'save lives,' because such procedures would reduce the need for many asylum seekers to embark on long and dangerous journeys in order to reach the country of destination, while it would stop the flow of money to migrant smuggling networks at the same time. However, extraterritorial processing is also of interest to states that seek to prevent asylum-seekers and migrants from reaching their countries (Refworld - UNHCR's Global Law and Policy Database, 2024).

Extraterritorial processing, or the desire to, is not a new phenomenon; rather the discourse about managing issues connected to migration outside of the EU borders first started in the 1980s, when cooperation agreements with countries of transit and origin in Africa were first introduced (Leclerc et al., 2024). More specifically, it was a Dutch initiative that sparked the examination of the possibility of establishing European processing centres outside the EU borders during intergovernmental consultations on migration, asylum, and refugees (Forced Migration Review, 2025). This idea, which gained the name 'reception in the region' was quickly backed by the Danish government during the Danish Presidency of the Council of the European Union in 2001. Two years later, the United Kingdom was among the first EU member states to put together a proposal on extraterritorial processing of asylum claims, after which Germany proposed to establish asylum centres in North Africa in 2005 (Forced Migration Review, 2025). However, not

just European countries were concerned with outsourcing migration. The United States intercepted and transferred Haitian asylum seekers to Guantanamo Bay, Cuba, beginning in the early 1990s (Dastyari, 2007). The United States used the Guantanamo Bay naval bay to detain and screen Haitian asylum seekers. Those that were rejected were repatriated, while the refugees that passed the screening were transferred into the United States (Dastyari, 2007).

The idea of extraterritorial processing was given more substance in 2016, when the Prime Minister of Hungary proposed to set up a 'giant refugee city' in Libya, which would make it possible to process the asylum claims there (Dunai, 2016). Austria also spoke up about their ideas for the externalisation agenda, which contained camps for rejected asylum-seekers in the Balkans. Italy has announced a protocol through which they will assess and process asylum applications made by people who have been rescued in the Mediterranean in Albania instead of within their own borders (Ricozzi, 2024). Two centres will be built in Albania to host migrants trying to reach the EU via the Mediterranean Sea. This deal was described by Italian Premier Giorgia Meloni as a "European agreement" and "an innovative solution" that aims to lower the rise in illegal crossings by sea (Ricozzi, 2024). However, the European Commission stated it was aware of the arrangement but that it had not received all details yet and that it is important that such arrangements are in full respect of EU and international law (Ricozzi, 2024). These two migrant facilities will be fully funded by the Italian state and will have Italian jurisdiction applied, while Albanian police guards will be in charge of controlling and patrolling these centres (Ricozzi, 2024). These centres, among which is an expulsion and detention facility, are expected to be operational by spring 2024 and can manage between 36,000 and 39,000 migrants per year. Meloni added that she hoped this agreement between Italy and Albania could become a "model" that other countries can follow (Ricozzi, 2024). Germany is also considering similar protocols to process asylum claims outside of its borders, and Austria and the United Kingdom have announced that they plan to collaborate and join forces on the matter of extraterritorial processing. The United Kingdom announced a new Migration and Economic Development Partnership with the government of Rwanda in April 2022, and the Safety of Rwanda Act was passed into law by the British Parliament in April 2024. Under this arrangement, asylum seekers in the UK would be transferred to Rwanda even before their claims for asylum are heard (UNHCR UK, n.d.). Responsibility would then fall into the national Rwandan asylum systems' hands to consider their needs for international protection. The UNHCR believes that the UK-Rwanda arrangement will shift responsibility for making asylum decisions and protecting refugees from the UK onto Rwanda, that the externalisation of asylum poses serious risks for the safety of

refugees, and that it is not compatible with international refugee law (UNHCR UK -, n.d.). In January 2024, following an election in the UK, the new government announced that they would not go ahead with the Rwanda Agreement (UNHCR UK -, n.d.).

Plans and agreements on extraterritorial processing must subject to international legal standards, particularly human rights and international refugee law (Leclerc et al., 2024). Asylum is regulated at international, EU, and national levels, where both EU and national asylum legislation must align with the international law framework that was set by the Geneva Convention in 1951 and has been incorporated into EU law (UNHCR - The UN Refugee Agency, n.d.). The core principle of this Convention is non-refoulement, which declares that refugees should not be returned to a country where they face serious threats to their lives or freedom. Furthermore, the document outlines the basic minimum standards for the treatment of refugees, like the right to housing, work, and education while displaced so they can lead a dignified and independent life (UNHCR - The UN Refugee Agency, n.d.). However, even the people who do not qualify for refugee status under the Geneva Convention can still be granted subsidiary protection under EU law if they can prove that substantial grounds exist for believing they could face a serious risk of suffering serious harm if they were to be sent back to their country of origin. Humanitarian visas can also be issued to people who are in urgent need of care or when long asylum procedures are getting in the way of family reunification (*Directive - 2011/95 - EN - Qualification Directive - EUR-Lex*, n.d.). This Geneva Convention and the Common European Asylum System (CEAS) prop up the most important rules and regulations that all EU Member States must abide by. The CEAS was completed in 2013 and contains five key acts; the Qualification Directive which clarifies the grounds on which international protection is granted to asylum-seekers; the Asylum Procedures Directive establishes procedures for granting and withdrawing international protection; the Reception Conditions Directive ensures that all Member States have common standards when it comes to granting asylum-seekers access to healthcare, employment, education, and more; the Dublin III Regulation establishes the criteria that determines which Member State is responsible for examining an application for international protection; and the Eurodac Regulation that facilitates the Dublin III Regulation through a database that includes the fingerprints of asylum-seekers and irregular migrants so their point of entry and their first application can be registered (*Directive - 2011/95 - EN - Qualification Directive - EUR-Lex*, n.d.). All Member States are responsible for receiving asylum applicants that, at the very least, measure up to the standards the CEAS has set out and for processing these applications within the required timeframe. What the EU law does not foresee is the processing of asylum applications outside of EU borders, and this

has resulted in Denmark, the Netherlands, the United Kingdom, and Germany proposing transit and processing centres in third countries multiple times (Leclerc et al., 2024). Despite their continuous push for these centres, the European Court of Human Rights and the Court of Justice of the EU have advocated against the option of extraterritorial processing (Leclerc et al., 2024). However, because there exists no overarching policy on the externalisation of detention, European countries have placed significant pressure on third countries to detain more and more migrants (Akkerman, 2021). According to Transnational Institute and Stop Wapenhandel, the EU exercises this pressure by using it in trade-offs. For example, candidate countries who want to join the EU must implement migrant policies as dictated by Europe if they wish their candidature to be considered (Akkerman, 2021). In other cases, negotiations have taken place wherein countries that agree to detain more migrants have gained relaxations for European visa requirements for their citizens (Akkerman, 2021). Ultimately, the EU's goal is to deter migrants from making the journey to Member States by making it known that migrants seeking to reach Europe will be intercepted and detained during their journey, which ignores that those trying to reach Europe are often fleeing physical, economical, and gender-based violence or have been forced to leave their homes and are simply trying to survive (Riemer, 2018). Turkish studies have shown that people selecting a route to reach Europe do consider the risk of arrest and the length of possible detention, but not to determine whether to make the journey or not, stressing that such journeys are made for survival (Üstübici & İçduygu, 2018). While claims are made that the outsourcing of migrants 'saves lives' because it would reduce the need to make long and dangerous journeys to the country of destination and would stop the flow of money to migrant smugglers, it actually causes migrants to seek other, often more dangerous routes and they are therefore driven into the hands of smuggling networks. It increases the risk of violence and death because the obstruction of certain migration routes by the EU leaves migrants with little choice but to set off on more dangerous and risky migration routes instead (Akkerman, 2021). When migrants do survive the journey and get intercepted, they are held in facilities that are funded, built, and resourced by EU Member States. Migrants who are arbitrarily detained can be held incommunicado, which means that their whereabouts are not communicated to family and loved ones for an extended period of time, amounting to forced disappearance (Akkerman, 2021). While being detained, migrants can also be denied access to humanitarian or legal assistance, be subjected to inhumane treatment, torture, forced refoulement to their countries of origin, forced labour and slavery, abandonment, and they can even be at risk of being killed (Akkerman, 2021). What mainstream media fails to remind us about is that migrants placed in such migration detention facilities are not guilty of anything, as anyone has the right to move and seek asylum (Akkerman,

2021). A recent example of migrants facing such treatment as if they have committed gross crimes is Trump's decision to send hundreds of mostly Venezuelan migrants to a mega-prison in El Salvador to be held there without trial (Reuters, 2025). This prison, called Cecot, opened in February 2023 and has the capacity to contain 40,000 inmates, claiming to be the biggest prison in Latin America. On March 15, the Trump administration deported 261 people to El Salvador, of whom 137 were moved under the Alien Enemies Act of 1798, saying these men were members of the Venezuelan gang Tren de Aragua but failing to provide many details about their cases (Reuters, 2025). One United States official said that "many" of those 137 men had no US convictions but still posed a serious threat. The 137 men were moved along with 101 Venezuelans for a one-year term that can be renewed, and according to the White House, the US government has paid El Salvador an estimated amount of six million dollars to receive the migrants (Reuters, 2025). Cecot is a tightly packed prison, where all inmates have shaved heads and cannot make use of an outdoor recreational space and family visits because those are simply not available. What prisoners do have is an average of 0.60 square metres of space, which is below international standards (Reuters, 2025). Cecot, like many other El Salvadorian prisons, has received criticism from many human rights organisations on the grounds of human rights violations like torture, inmate deaths, and mass trials, yet the El Salvadorian government doesn't seem impressed with these cases (Reuters, 2025). Like many other detained migrants around the world, these men are being treated like criminals but do not have (sufficient) charges or allegations that prove they are, in fact, criminals.

Offshore and extraterritorial asylum processing, while often framed as solutions to irregular migration, are largely rooted in deterrence and control. Across the world, from Australia to the EU and the United States, these practices shift the responsibility for asylum away from the nations own national borders, which often happens at the expense of international legal obligations and human rights. Despite claiming to save lives and disrupt smuggling networks, the reviewed literature highlights that these strategies actually often force migrants onto more dangerous routes and increase their vulnerability to violence, exploitation, and detention. Furthermore, while international frameworks like the Geneva Convention and the CEAS are intended to guarantee the asylum seekers' safety, many offshore policies contradict these protections. Ultimately, offshore processing is not a neutral administrative tool but instead reflects a broader political effort across many Global North countries to restrict access to asylum. As this thesis turns to the specific cases of Australia and the Netherlands, it will explore how these deterrence-bases approaches are implemented, justified, and contested in practice.

Theoretical and conceptual framework

The main theoretical framework that I will use in this thesis is kyriarchy. Kyriarchy is a feminist theory, coined by Elisabeth Schüssler Fiorenza in 1992, and entails a social and discursive system that interstructures gender, race, class, and colonialist oppressions and has as its focal point women at the bottom of the socio-political and religious pyramid (Fiorenza, 1997). In the case of the Australian offshore asylum processing system, kyriarchy can be understood as a social system built around domination, oppression, and submission (Boochani & Tofighian, 2020). Kyriarchy plays a central role in the book *'No Friend but the Mountains'* that Behrouz Boochani wrote about his experience in the Australian detention centre on Manus Island. It represents the multi-structural nature of the Australian border control system, and it orchestrates the systematic torture that was inflicted upon the detainees in the Manus detention centre (Boochani, 2018, p. 369). By using this term, a truer and more accurate representation can be made of Boochani's thinking and experience because it explicitly encompasses multiple, interlocking kinds of oppression and stigmatisation, including racism, xenophobia, heteronormativity, economic- and faith-based discrimination, class-based violence, coloniality, Indigenous genocide, anti-Blackness, and militarism (Boochani, 2018, p. 370). By using this term and understanding the deep levels of intersecting tools of oppression, the Manus detention centre can be connected to Australian colonial history and fundamental factors plaguing contemporary Australian society, politics, and culture. It is important for me to use this theoretical framework not only to identify the discrimination and oppression in the Australian case but also to identify it in the Dutch context or see how it could possibly lead to discrimination and oppression. It also helps me dissect power relations, imbalances, and struggles, since kyriarchy does not just contain the oppressor and the oppressed; it instead is a complicated web in which the oppressors themselves usually are oppressed in their own way. An example from Boochani's book (2018) is the prison guards. Many prison guards are from Papua New Guinea themselves and work alongside Australian guards due to an agreement made between the PNG and Australian governments to employ the local people (p. 144). These local prison guards are now absorbed into the kyriarchal system of Manus Prison, but Boochani describes them as "unlike their Australian colleagues," "free spirits," and "indomitable." Yet still the kyriarchal system oppresses them; every Papua New Guinean officer working in the facility is expected to follow orders from Australian officers without question, they get paid much less than their Australian colleagues, and even the colour of their uniform is different (p. 145) This leads to some alliances between the local guards and the detained

men of Manus Island, yet still these guards oppress the detainees by carrying out the harmful orders they get from those who are higher up in the hierarchy of power (Boochani, 2018, p. 145). The kyriarchal framework will be able to help me figure out structural and colonial power relations in the cases I will be researching.

Another theoretical framework I want to apply to this thesis is a neocolonial framework. Neocolonialism entails the subtle propagation of socio-economic and political activity of a former colonial ruler aimed at reinforcing capitalism, cultural subjugation, and neo-liberal globalisation of a former colony (Afisi, 2017). The former colonial powers ensure that the newly independent countries remain dependent on them for political or economic direction and aid. This dependency on the colonial ruler's home state opens the previously colonised country to exploitation of their socio-economic and political lives for the economic, political, cultural, ideological, and military benefits of the coloniser's state (Afisi, 2017). This can be carried out through indirect control of political and economic practices in the newly independent states or directly through military control, which was present during the colonial era (Afisi, 2017). In this thesis I am focusing on two cases: the Netherlands and Australia, two previous colonial powers. Beyond that, I already established how many EU countries are currently implementing (or aiming to) some form of extraterritorial processing, and many of these countries have a colonial past as well (the United Kingdom, Germany, France, Denmark, etc.) Interestingly, the countries these EU Member States want to push their facilities to are formerly colonised countries (Albania, Rwanda, Libya, Algeria, etc.) This is important to keep in mind because these relations can reflect neocolonial logics by shifting the burden of dealing with refugee protection to less powerful countries through financial incentives or diplomatic pressure of trade-offs. But also by exploiting the geopolitical skewedness and using economic leverage to secure cooperation from countries with fewer resources and less political power. This can all lead to the reinforcement of colonial narratives, such as the portrayal of migrants as threats, burdens, or people in need of Western control or saving. It does not only dehumanise the asylum seekers but also places the independent states back in colonial ties with former colonising states. I will use the neocolonial framework to argue that this carrot-and-stick approach is not fair and is a form of exploitation.

Methodology

I will be carrying out qualitative research to gain an in-depth understanding of the research issues, as qualitative research deepens the understanding of the meanings and interpretations that it gives to behaviour, events, or objects (Hennink et al., 2020). This research will adopt the approach of document analysis, combining it with critical discourse analysis (CDA) to not only understand what has been written by the official state governments of the Netherlands and Australia, but also what it means. My general aim is to analyse in what ways the Netherlands is trying to keep asylum seekers, immigrants, and refugees from coming into the country and at the same time send away those that are already here, and compare and contrast this to the Australian offshore asylum processing system.

Document analysis is a systematic procedure for reviewing or evaluating documents – both printed and electronic (computer-based and Internet-transmitted) material (Bowen, 2009). Like other analytical methods in qualitative research, document analysis requires that data is examined and interpreted in order to elicit meaning, gain understanding, and develop empirical knowledge (Corbin & Strauss, 2008). As for data collection, I will include a variety of documents in the analysis of this thesis, which will all help to create a thorough and broad view of the offshore processing system in both the context of Australia and the Netherlands. Documents included are legislative texts, which can include laws and regulations on immigration and asylum procedures; policy papers or governmental reports that state objectives or strategies related to extraterritorial processing; parliamentary debates, either their transcripts or video records, which will be quoted verbatim, and official communications such as news articles and press releases or statements from relevant party leaders, government officials, ministries, and/or agencies. I will narrow this down by looking into recent documents. In the case of the Netherlands, this will be from 2022 until July 2025, and in the case of Australia, because it has a longer history, it will be from the early 2000s until 2025. To guarantee the use of reliable and authentic sources, the documents used are all freely available and can be sourced from official government websites, parliamentary websites and archives, and online databases. I will select the relevant sources by first reading and rereading the documents to gain a good overall understanding of the text, after which I will identify and select the relevant sections of that text, which I will then place within the broader themes used in this thesis to use it to relevantly and accurately answer my thesis research question.

Because I will be analysing written text for this thesis research, I will therefore also use critical discourse analysis. Critical discourse analysis is a valuable approach to studying

discourses in a particular sociopolitical and historical context, paying special attention to how unequal power relations are expressed through discourse (Wodak & Meyer, 2009). Discourse analysis is the analysis of language in use and context (Brown & Yule, 1983). By combining both document analysis and critical discourse analysis, I aim to bridge the gap between the formal policy structures and more narrative and discursive practices. I do this specifically because the issue of extraterritorial processing is one between governments and powerful commanding officers and immigrants and therefore unequal when it comes to power relations. On top of that, I will argue in Chapter Three that this issue is rooted in neo-colonialism, racism, and Islamophobia. I will practice critical discourse analysis by looking closely into the language use, vocabulary, metaphors, and rhetoric used in the texts I select, as well as exploring how different texts reference, relate to, build on, or critique each other. Most importantly, I will put the discourse within the broader socio-political context, because critical discourse analysis is a useful tool to reveal how language both constructs and influences policy-making and social realities.

I do have to keep in mind that there are a few limitations to my methodology that may influence my research and its results, although I strive to be as objective as possible when doing my research. One of these limitations is the scope of the selected documents. I will be using documents that are publicly available, and therefore I might not be able to capture all important aspects of policymaking. Furthermore, I will be collecting sources in Dutch and English, which may result in me possibly missing out on relevant sources in other languages. I do not expect this to be a major problem since my focus is on the Netherlands and Australia, which use Dutch and English primarily, but for the discourses in other (EU) countries, it might lead to overlooking important discourses. Regarding languages, because this thesis is written in English, I will have to translate Dutch texts to English in order to convey their meaning. During this translation process, some subtle intonations, meanings, or emphases can be lost because there simply is no direct translation for them. To try and keep this loss of meaning through translation as little as possible, I will use the AI translation program DeepL and my own fluency in the Dutch language. That means that sometimes I will literally translate and sometimes paraphrase to keep as much of the original text' meaning intact. When translating from Dutch, I will also include the original Dutch text so Dutch readers can appreciate the unedited text.

Despite these limitations, the methodologies I will employ provide a sturdy framework for analysing the offshore processing system in the context of the Netherlands and Australia.

Chapter One; What is the current state of Australian asylum policy?

In this chapter I will outline how the kyriachial Australian offshore asylum processing system operates to give the thesis the relative background information and international impact the Australian 'Pacific Solution' has had thus far.

In 2001, Prime Minister John Howard's Coalition Government established the offshore processing of refugee claims in order to deter the arrival of asylum-seekers who came to Australia by boat (Fleay & Hoffman, 2014). This policy, also known as the Pacific Solution, included an agreement with Nauru and Papua New Guinea's (PNG) Manus Island, which entailed that asylum-seekers arriving to Australia by boat would be transported to either of these islands, where they would wait in camps while their claims to seek refuge were processed (Fleay & Hoffman, 2014) (Carrera & Guild, 2017). The legislation for this plan passed in September 2001 and excised selected territories from Australia's migration zone, preventing the possibility of making asylum claims upon arrival in these areas (Foulkes, 2021). The Pacific Solution was a reaction to the Tampa incident. This incident took place on August 24, 2001, and involved the Norwegian cargo ship MV Tampa, the Australian government, and 433 rescued asylum seekers. The freighter rescued the men, most of them fleeing from the Taliban rule in Afghanistan, from an Indonesian fishing vessel in international waters, some 140 kilometres north of Australian territory, Christmas Island (Phillips, 2017). After the asylum seekers were rescued, the Tampa's captain, Arne Rinnan, wanted to bring the asylum seekers to Christmas Island for safety and urgent medical assistance, which is in line with the maritime law that ships rescuing people at sea are obliged to deliver them to the nearest safe port (Marr & Wilkinson, 2003). However, the Howard government refused to allow the Tampa to dock, arguing that the asylum seekers were attempting to enter Australia illegally and that the asylum seekers were a concern to their border control and national sovereignty. Australian authorities deployed the SAS (Special Air Service Regiment) to board the Tampa and take control of the vessel while it was still in Australian territorial waters, which caused major international backlash (UNHCR, 2001). It inspired diplomatic protests from Norway and the United Nations High Commissioner for Refugees expressing its concern that Australia was not following its obligations under the 1951 Refugee Convention, also known as the Geneva Convention (UNHCR, 2001). In response to this incident, the Howard government included territories such as Christmas Island into Australia's migration zone and built offshore detention centres in Nauru and Papua New Guinea (Manus Island) to handle the asylum claims there (Foulkes, 2021). The first who were sent to these offshore centres were the rescued people aboard the MV

Tampa. The offshore processing was used as a deterrent; the Australian government wanted it to be known that illegal boat arrivals were not welcome in Australia.

However, the Pacific Solution was ended officially in February 2008 by the Rudd government and caused the closing of offshore detention centres and the resettling of the remaining detainees. This decision was based on a significant decrease in migrants reaching the Australian borders by boat and humanitarian concerns (Tan, 2017). In the following years, a surge in boat arrivals to the Australian coast was noticed and the Gillard government decided to reinstate the 'Pacific Solution' in August 2012. Nauru and Manus Island reopened their closed processing centres and received people who made asylum claims again (Davidson, 2018). This followed several tragedies, including an explosion on a boat near Ashmore Reef in 2009 and the crashing of Siev 221 on the coast of Christmas Island in 2010, which increased the death toll at sea to over a thousand (Davidson, 2018). An enhanced screening process was introduced to the processing centres, but it was widely criticised for not being transparent. Soon after, reports from Amnesty International and the UNHCR were released in which the organisations condemned the conditions in the centres on Manus Island and Nauru and the indefinite nature of detention for the asylum seekers, with Amnesty labelling the Nauru centre as "a human rights catastrophe" (Davidson, 2018). In 2013 the Abbott government launched Operation Sovereign Borders, which was a military-led initiative that aimed to stop arrivals by boat; the operation contained boat turnbacks, offshore processing, and third-country resettlement (Reporter, 2024). It was a response to a protest that had spiralled into a riot on Nauru, which was "an inevitable outcome from a cruel and degrading policy," according to Salvation Army employees (Davidson, 2018). In 2015 the Australian government introduced the Border Force Act, which entailed that the disclosure of information about the conditions inside offshore centres by employees would become punishable by a prison sentence of up to two years. However, this law was highly criticised and many (former) employees continued to speak out (Davidson, 2018). Among these were reports and concerns about the violence and physical and mental illness that accumulated inside these offshore sentences, like the killing of Reza Barati and injuring of 60 others in February 2014 during a disturbance at the facility on Manus Island (Farrell, 2014), or the death of Hamid Khazaei in September 2014 due to inadequate medical care (Om, 2014). In 2015, the Forgotten Children report, written by the Human Rights Commission, brought to light that more than 300 children in the offshore centres made or threatened self-harm attempts in a little over 15 months, 30 reported sexual assault, another 30 nearly went on hunger strike, and more than 200 were involved in assaults (Doherty, 2018). The Coalition government of Australia brushed this off as "a

transparent stitch-up" and argued that the Commission should be "ashamed of itself" (Medhora & Doherty, 2018). The horrors of what happened on Manus Island have also been brought to light by Behrouz Boochani, an Iranian refugee who arrived on the coast of Australia only four days after the 'Pacific Solution' was reinstated in 2013 (Boochani, 2018, p. 89). His book describes his gruesome journey across the ocean up until the riot in Manus Prison, as Boochani calls it. Boochani gives many anecdotes and insights into the violence and humiliation that the detainees at Manus Prison have to face on a daily basis; the invasive CCTV camera's in bathroom stalls that harm privacy (p. 84), the ill-fitting clothes the detainees are forced to wear (p. 85), the broadcasting of detainees being moved into an aeroplane to make the journey to Manus Island seem as if they are prisoners (p. 93), giving the detainees numbers to strip them of their names and humanity, like Boochani's number MEG45 (p. 96), prohibiting pastimes like playing games to increase boredom and restlessness (p. 126), forcing detainees to queue for food, drink, medicine, cigarettes and other necessities for hours a day (p. 156), the very unhygienic bathrooms that far too many people have to share (p. 160), the prison guards shutting down the fans, water, or electricity at will to torture the detainees (p. 178), and much more (Boochani, 2018). Unsurprisingly, the Manus Island 'prison' Boochani was in was ruled unconstitutional by the PNG Supreme Court in 2016 and closed down in 2017, but even though Australia went through resettlement agreements with the United States and other countries, many asylum seekers still face prolonged detention and unsure futures (Davidson, 2018). However, as of November 2024, Nauru still holds over 100 asylum seekers, which is the highest number since the early 2010s, and as human rights organisations continue to criticise the Australian offshore processing system for its horrific impact on detainees' mental and physical health, Australia keeps claiming they are not responsible for the harm done to the detained people on Nauru and PNG (Doherty, 2025). The Australian government says that those sent offshore are no longer Australia's responsibility and that they can therefore not be held accountable for the fates of those over which they gave up "effective control." The government also told the UN committee that it works closely with the Nauruan government to support the provision of health, welfare, and support services, but the offshore processing system is not the Nauruan government's policy – it is that of Australia. It is an Australian government policy, enacted by Australian legislation and enforced by Australia's border force and Department of Home Affairs (Doherty, 2025).

In this same month, November of 2024, new anti-migration laws have passed in Australia (Hennessy, 2024). These laws expand the country's offshore detention regime, allow officials to pursue prison terms for people who resist deportation, including asylum

seekers, and further evade international obligations. This legislation was introduced through the following three bills: the Migration Amendment (Removal and Other Measures) Bill, the Migration Amendment Bill, and the Migration Amendment (Prohibiting Items in Immigration Detention Facilities) Bill (Hennessy, 2024). These laws authorise the government to pay third countries to accept noncitizens, including recognised refugees, and contrary to international standards, the law does not require these third countries to be parties to the Refugee Convention, nor do they include adequate safeguards to protect deported refugees from harm or detention abroad or refoulement to countries where they might face persecution (Hennessy, 2024). According to a recent Senate inquiry, around 80,000 noncitizens could face deportation under these laws (Hennessy, 2024).

The Migration Amendment (Removal and Other Measures) Bill introduces a mandatory cooperation regime where noncitizens, including those with bridging visas or recognised refugees, can be legally directed to take active steps to facilitate their own deportation, such as applying for passports, providing documents, and attending appointments. Refusal is punishable by 1 to 5 years in prison, with a minimum sentence of 12 months (Parliament of Australia, 2021). The bill also allows the minister to designate "removal concern countries," meaning that most nationals from those countries will be banned from applying for any Australian visa for up to three years, potentially without regard for family reunification or humanitarian principles (Parliament of Australia, 2021). Furthermore, it empowers the minister to reverse protection visa grants, undermining the finality of refugee determinations. In order to protect itself, the bill also grants the government immunity from civil lawsuits related to deportations and third-country removals, excluding challenges for harm caused during or after removal (Parliament of Australia, 2021). This bill has received international critique, including from Amnesty International and HRLC (Human Rights Law Centre) (Feng, 2024). They warn that criminalising non-cooperation with deportation breaches non-refoulement and due process protections (Rugg, 2024). The Law Council and human rights advocates argue the bill could possibly lead to family separations, arbitrary ministerial power, and violations of international refugee obligations, for example, when it comes to the risk of breaching non-refoulement (Karp, 2024).

The Migration Amendment Bill allows the reintroduction of conditions like wearing ankle monitors or adhering to curfews on previously released immigrant detainees, aiming to ensure compliance with their removal orders in light of the High Court deciding to end indefinite detention (Parliament of Australia, 2021b). It also authorises government spending to pay third countries to accept deportees and prevents legal action against

Australia or those third countries in civil courts for removal-related harm (Parliament of Australia, 2021b). On top of that, visas and protection decisions, including character- and community- protection grounds, can be reversed at any time (Parliament of Australia, 2021b). This bill, too, is in serious risk of breaching protections for refugees and immigrants like non-refoulement, but it also undermines judicial oversight, as Australia and third countries will be protected in civil courts, and it encourages punishing conditions for refugees and noncitizens.

The last bill, the Migration Amendment (Prohibiting Items in Immigration Detention Facilities) Bill, allows the Minister, via legislative instruments, to define "prohibited items," for example, drugs or phones or other internet-capable devices, in immigration detention settings if the Minister believes the item to be unlawful to possess in Australia or if the thing would pose a risk to the health, safety, or security in the (order of the) facility (Parliament of Australia, 2021c). The bill also authorises warrantless searches, use of detection methods including search dogs, and seizure of detainees' personal belongings for facility security. Alongside these measures, the bill also includes safeguards so the measures will not be abused. Seizure of personal belongings is only allowed to prevent serious risk, and the item(s) can be returned when they are no longer needed for research or preventive action. On top of that there must be alternative communication means for detainees for legal access, communication with family and loved ones, and communication about political matters (Parliament of Australia, 2021c). Yet, this is not enough to appease opposing voices, like those of human rights groups. They argue that the bill increases the securitisation of detention and limits detainee rights and that it stands in the way of transparency, especially when it comes to accountability via legal advice (Karp, 2024b). Josephine Langbien, an associate legal director at the HRLC argues that this law gives the minister sweeping powers to ban almost any item in detention, including mobile phones, which are a lifeline for people in immigration detention, and that such laws will worsen conditions in detention and make it easier for abuse to thrive behind closed doors (Karp, 2024b).

This package of bills significantly expands the executive authority over asylum seekers and noncitizens in the Australian detention system, and it reinforces Australia's deterrence migration policy by introducing criminal penalties, curfews, and ankle monitors to force compliance with a person's own removal from the country. Important to note is that the minister gains a large amount of power to reverse protections, revoke visas, blacklist entire nationalities, and ban and confiscate personal items of people in detention. To top it all off, this package of bills also includes immunity provisions to shield the government from accountability in civil court.

The current state of Australian asylum policy is characterised by a persistent and intensifying commitment to deterrence and securitisation. Since the Pacific Solution passed in 2001, Australian governments have maintained and expanded the offshore processing system that deliberately takes away the responsibility from Australia's borders. Even though offshore detention has been justified under the guise of protecting lives at sea and maintaining border security, the long-term and real impact has instead been that a system has been put in place that imposes profound physical, psychological, and legal harm on asylum seekers. The more recent expansion of the Australian deterrence-based legislation through the passage of the three Migration Amendment Bills in 2024 further enforces ministerial power, criminalises people who refuse to cooperate, and prioritises state control over human dignity and rights. Australia's current asylum policy operates through control, surveillance, and punishment, with no regard for international critique.

Chapter Two; What is the current state of Dutch asylum policy?

In this chapter I will outline the recent and current state of Dutch asylum policy. I will outline what happened since the collapse of the previous Cabinet Rutte IV right up until the consequences of the very recent fall of the most recent Cabinet Schoof I. I will analyse what the recent coalition was built upon and what their plans were for the next four years, what caused sudden tension between coalition parties, and what eventually caused this Cabinet to fall. This will be done by closely reading into government documents and policies such as the Hoofdlijnenakkoord and other official statements regarding immigration.

The very recent fall of the Dutch cabinet in June 2025 due to disagreements surrounding migration policies may have come as a surprise to some, but it is not the first time this has taken place. The last Dutch cabinet, Rutte IV, also collapsed due to migration policies that coalition parties just couldn't agree on (Corder, 2023). Rutte took months to negotiate a package of measures that would reduce the flow of new migrants arriving in the Netherlands, which reportedly included the creation of two classes of asylum. One of these classes would be a temporary one for people fleeing conflicts, and the other class would be a permanent one for people fleeing persecution. Aside from these classes, the number of family members allowed to join asylum-seekers in the Netherlands would also be reduced in this package (Corder, 2023). This last idea, of blocking family members, was strongly opposed by minority coalition party ChristenUnie (Christian Union). This caused Mark Rutte to hand in the resignation of the four-party coalition, meaning re-elections followed later that year (Corder, 2023). In this re-election at the end of 2023, Geert Wilders won with his party Partij Voor de Vrijheid (Freedom Party), which is known as a far-right and anti-Islam populistic party (Corder, 2023b). Wilders' election programme included calls for a total halt on accepting asylum-seekers, migrant pushbacks at Dutch borders, a referendum on the Netherlands leaving the EU, 'de-Islamifying' the Netherlands, a stop to investing money into issues surrounding climate change, and the creation of a solution for issues such as the cost-of-living crisis and housing shortages. (Partij Voor de Vrijheid, 2023). However, his focus was on migration, and he claimed to bring the Netherlands 'the strictest asylum regime ever' (Corder, 2023b). To do this, Wilders needed to form a coalition, and he managed to do so with Yeşilgöz's VVD (Volkspartij voor Vrijheid en Democratie or People's Party for Freedom and Democracy), Omtzigt's NSC (Nieuw Sociaal Contract or New Social Contract), and Van der Plas' BBB (BoerBurgerBeweging or Farmer Citizen Movement). Together, this coalition produced a Hoofdlijnenakkoord (outline agreement), which is a document that includes all the plans

and promises that the future government aims to fulfil. The second issue touched upon in this Hoofdlijnenakkoord is migration, and it says, “Concrete steps are being taken toward the strictest admission regime for asylum and the most comprehensive migration control package ever.” (Bureau Woordvoering Kabinetsformatie, 2024, p. 3).

First and foremost, the exemption provision of the 2000 Aliens Act (Vreemdelingenwet), under Sections 110 and 111, is aimed to be activated as soon as possible. Sections 110 and 111 are regulations dealing with the so-called “emergency law” in immigration law. These articles make it possible to deviate from the regular provisions of the 2000 Alien Act in exceptional circumstances (Wettenbank, 2025). Section 110 regulates the procedure for triggering Article 111, and Article 111 gives the power to deviate from the regular immigration law in extraordinary circumstances by means of an AMvB (algemene maatregel van bestuur or executive order). The coalition writes that in the necessary general order of administration, with supporting justification, those terms of the Aliens Act 2000 will be rendered inoperative that stand in the way of directly addressing the acute emergency situation for the asylum influx in general and the asylum reception in Ter Apel and the other asylum centers in particular (Bureau Woordvoering Kabinetsformatie, 2024, p. 3.). This means, in short, that the coalition aimed to activate Sections 110 and 111 of the 2000 Aliens Act regardless of what terms might stand in the way by taking them out of operation. However, Section 110 poses that Section 111, which enacts the “emergency law,” can only be entered into force by royal decree, on the recommendation of the Dutch Prime Minister. As we know now, after the collapse of this coalition in June 2025, this did not happen, but efforts have been made. Official documents have been published by the Rijksoverheid (Central Government) that circulated within the Ministry of Justice and Security and the council of ministers that all have to do with the applications of Sections 110 and 111 (Ministerie van Algemene Zaken, 2025). A shocking amount of text in these official documents has been blacked out, leaving only headers and the occasional word or sentence; however, on the first page the sentence ‘kern van het voorstel’, meaning ‘core of the proposal’, is still visible (Ministerie van Algemene Zaken, 2025). This means that dating back to August 23 2024, a proposal was put on the table that tried to bypass the Alien Act as per the motivation in the Hoofdlijnenakkoord. This is confirmed by what seems to be an email or other electronic letter, addressed to and sent by unknown people because their names have been blacked out too. The letter starts as follows:

> ***Zoals verzocht*** *hieronder een aantal bullits waarin wordt toegelicht waarom het aangewezen is om in de MR niet alleen het kb en de voortduringswet te*

> *agenderen maar ook tenminste een amvb*. (Ministerie van Algemene Zaken, 2025, p. 22).

This translates to:

> "**As requested**, below are some bullet points explaining why it is appropriate to put on the MR agenda not only the kb and the continuation law but also at least an amvb."

It is impossible to know who requested these bullits and who provided them, but they give some interesting insights. It starts off by reiterating that if Section 111 is activated by royal decree, it is allowed to stray from the law by executive order, but that without this executive order it would be an "empty emergency law" – meaning that the emergency law is activated but no measures have been taken yet (Ministerie van Algemene Zaken, 2025). While this is lawfully permitted, nothing is happening to solve the extraordinary circumstances under which the emergency law has been activated. The bullits go on to say that the application of the "emergency law" that's now envisioned is different from situations in which it has been addressed before, because in those situations, specific emergency powers were activated, and thus further legislation was not needed (Ministerie van Algemene Zaken, 2025, p. 22). An application as now envisioned, in which multiple measures need to be taken in stages to deal with a situation, is different, and it would be appropriate to have the royal decree and continuation law at least accompanied by an executive order (Ministerie van Algemene Zaken, 2025, p. 22). This is recommended because it shows what the "emergency law" actually entails and this makes it possible for the executive order to take effect immediately when the "emergency law" gets activated (Ministerie van Algemene Zaken, 2025, p. 22). In another part of this collection of official documents, a note addressed to the Minister of Asylum and Migration, which at the time (August 8th, 2024) was Marjolein Faber of the PVV, also touches upon the need for a very strong motivation to enact this "emergency law." It states:

> *Wij wijzen er met **nadruk** op dat het **niet gemakkelijk** zal zijn om tot een juridisch houdbare onderbouwing voor activering van art. 110/111 Vw te komen, omdat het **twijfelachtig is dat thans sprake is van buitengewone omstandigheden** die noodzaken tot activering. Het vorige kabinet heeft in antwoord op vragen van de Tweede Kamer (TK) in een brief aan de TK (19637, nr. 3002) **in november 2022 aangegeven dat er**, voor wat betreft de reguliere asielstromen, **op dat moment geen sprake was van buitengewone omstandigheden** die toepassing van het staatsnoodrecht rechtvaardigden. Het kabinet moet een oordeel vellen of er nu*

> *sprake is van buitengewone omstandigheden die noodzaken tot activering van 110/111 Vw.* (Ministerie van Algemene Zaken, 2025, p. 34).

In this text, the Directorate General Migration, Directorate Legislation, and Legal Affairs want to **emphasise** that it **will not be easy** to arrive at a legally tenable justification for activation of Sections 110 and 111 because it is **doubtful that there are currently extraordinary circumstances** that necessitate activation of the "emergency law." The previous Cabinet indicated in response to questions from the House of Representatives (TK) (…) **in November 2022 that**, as far as the regular asylum flows were concerned**, there were no extraordinary circumstances** at that time that justified the application of the state "emergency law." The Cabinet must make a judgment on whether there are extraordinary circumstances that necessitate the activation of Sections 110 and 111 now (Ministerie van Algemene Zaken, 2025, p. 34).

This note ends with some points of discussion, which state the following:

> *State emergency law requires **very strong justification** because action is taken outside parliament. If this justification is lacking, then the use of state emergency law is **not acceptable from a democratic and constitutional point of view.** In addition, such use will be **difficult to defend legally and politically**. It was recently said by the Council of the State and the government that **state emergency law should not be used to address structural problems in regular reception*** (Ministerie van Algemene Zaken, 2025, p. 37).

The "emergency law" has not been activated as this thesis is being written, and because of the collapse of the Cabinet, it is assumed it will not be activated anytime soon. However, it is important to note that attempts have been made, as this was an agreed point on the Hoofdlijnenakkoord signed by all the coalition parties.

The second measure the coalition agreed on in the Hoofdlijnenakkoord was the immediate activation of a temporary Asylum Crisis Act with crisis measures to address the acute asylum influx and reception crisis for the foreseeable future, including revoking the Spreidingswet (Dispersal Act). The Dispersal Act was activated on Feburary 1st, 2024, and mandates all municipalities to host asylum seekers to help spread the care for asylum seekers over the country so they are not all forced to stay in a few crowded centres (Van Mersbergen, 2024). Wilder's coalition wanted to revoke this Act as soon as possible because the PVV and its Minister of Asylum and Migration, Marjolein Faber, are convinced this Act sends the wrong message. Instead of creating more hosting centres, the PVV wants to receive as few asylum seekers as possible and send back the asylum seekers that are already in the Netherlands (Van Mersbergen, 2024). However, the

Dispersal Act seems to work, as all twelve provinces have created 80,091 places of shelter in total, which accounts for 83 percent of the number of places of shelter the Dispersal Act prescribes. The Dutch saying ‘vele handen maken licht werk’ (literal translation: many hands make light work) seems to apply to this Act, because ever since every municipality was forced to house an agreed amount of asylum seekers, the pressure on municipalities that already housed asylum seekers has been decreasing (Van Mersbergen, 2024). Because there are more permanent locations, the need for emergency shelters, which are expensive and often unhygienic and unsafe, also decreases. Even though not all municipalities have been able to reach the number of required places that is asked of them, they do agree that the Dispersal Act works and therefore oppose the PVV’s desire to revoke it (Van Mersbergen, 2024). As of June 2025, the Dispersal Act is still in place.

Aside from the Dispersal Act, the Hoofdlijnenakkoord calls for the activation of the Asylum Crisis Act, which would put a few rules into action. The first is to enforce registration and suspend processing of asylum applications; the right to reception during the suspension will be differentially limited and severely curtailed (Bureau Woordvoering Kabinetsformatie, 2024, pp. 4). It would also allow the deportation of as many people as possible without a valid residence permit, including by force and deviation from the Housing Act by prohibiting giving priority in the allocation of social housing to status holders on the grounds that they are status holders (Bureau Woordvoering Kabinetsformatie, 2024, pp. 4).

The third measure is that an opt-out clause for the European asylum and migration policy will be submitted to the European Commission as soon as possible. With like-minded and neighbouring countries, intensive cooperation will be intensified in order to be able to act adequately in times of a common crisis due to influx, in addition to the structural intensification of mobile surveillance security. This is done by erecting border control and security at the Dutch borders to control who comes into the Netherlands by car (Bureau Woordvoering Kabinetsformatie, 2024, p. 4). Since December 9th, 2024, the Netherlands has been conducting these border controls, which originally would only last six months but have been extended until December 9th, 2025 (Ministerie van Justitie en Veiligheid, 2025). The Royal Military Police is doing this by order of the Ministry of Asylum and Migration to combat irregular migration and cross-border crime (Ministerie van Justitie en Veiligheid, 2025).

Fourth, the Hoofdlijnenakkoord states that in order to limit asylum inflows, the Netherlands must structurally belong to the category of member states with the strictest

admission rules in Europe (Bureau Woordvoering Kabinetsformatie, 2024, pp. 4). A long list of measures follows, of which I will highlight the most important and interesting parts.

The list starts off by wanting to tighten the admission procedure by not rewarding if someone deliberately fails to prove their identity, adjusting and enforcing safe country criteria, reading through cell phones, and limiting legal aid (Bureau Woordvoering Kabinetsformatie, 2024, p. 4). Furthermore, as mentioned previously, they aim to intensify the border control and checks. Irregular migrants that are found during these checks at the Dutch border will be sent back immediately to Germany and Belgium, especially when there is a lack of a valid identification document (Bureau Woordvoering Kabinetsformatie, 2024, p. 4). The coalition also wants to strongly cut back on family reunification and put hefty restrictions on na-reizigers (after-travelers, meaning the family of a migrant), including restrictions to the so-called “core family” with children up to age 18. Reception of underprivileged and disadvantaged asylum seekers will be moved to segregated locations with a regime that is partially closed and as austere as possible, and on top of that, the state contribution to the National Immigration Facility will be terminated (Bureau Woordvoering Kabinetsformatie, 2024, p. 4). Another priority is tackling crime among and by asylum seekers hard by directly tackling offenders, including through removal from the reception location, halting the asylum procedure earlier, and declaring the residence permit expired earlier. In application and reception locations, strict and rigorous action will be taken against violence and nuisance by asylum seekers, particularly towards female asylum seekers and asylum seekers from LGBTQ+ and/or Christian backgrounds (Bureau Woordvoering Kabinetsformatie, 2024, p. 5). This strikes me as curious. Standing up for LGBTQ+ people is not something Wilders’ PVV is known for. PVV opposed the Transgender Act that gives transgender people the right to autonomy, the abolishment of conversion therapy (homogenezing), the protection and promotion of human rights of LGBTQ+ people abroad, the improvement of gay and lesbian experience in the police department, the research to possibly build more transgender clinics, the improvement of safety of LGBTQ+ people in emergency shelters, and many more acts and laws (Mol, 2025). Furthermore, it is interesting that violence against Christians is also mentioned. I am uncertain as to why it is mentioned at all, because the Netherlands is not a Christian state (CBS, 2021), and none of the coalition parties are Christian parties. The Hoofdlijnenakkoord fails to motivate why violence against these groups are particularly important. Lastly, the Hoofdlijnenakkoord calls for sending migrants back who have been denied access in other EU countries and presenting

parts of countries as safe instead of countries as a whole to send back groups of asylum seekers quicker (Bureau Woordvoering Kabinetsformatie, 2024, p. 5).

This Hoofdlijnenakkoord was signed and agreed upon by all coalition parties, which are PVV, VVD, NSC, and BBB, so the coalition, and with that the entire Cabinet, collapsing over migration while all parties aligned might seem surprising. The reason why it went wrong is because Wilders grew frustrated with not having achieved any of the plans described in the Hoofdlijnenakkoord, despite the Minister of Asylum and Migration being part of his own party, and created a list of demands. He hosted a press conference on the 26th of May in which he motivated his list of demands and read them out loud. I will quote Wilders verbatim. He said,

"Nederland moet weer Nederland worden. En dat betekent dat we de instroom van niet-westerse, vaak Islamitische, vreemdelingen met extra maatregelen verder moeten beperken." (Maarten van Rossem - De Podcast, 2025)

This translates to

"The Netherlands must become the Netherlands again. And that means we must further limit the influx of non-Western, often Islamic, aliens with additional measures."

He goes on to say that the Netherlands is not the Netherlands anymore, that the streetscape (straatbeeld) of our neighbourhoods has changed beyond recognition because of mass immigration and Islamisation (Maarten van Rossem - De Podcast, 2025). According to Wilders, we have too many aliens, too much Islam, a lack of respect for our own culture and people, the integration of many allochtonen (a loaded term for immigrants) fails, and there is an abundance of aggression and violence. After this, he blames the referenced public aggression and violence on groups of young Syrian, Moroccan, and other immigrant men (Maarten van Rossem - De Podcast, 2025). After reiterating that the Dutch people can no longer wait on tougher immigration policies and the PVV will not wait any longer, Wilders lays out his ten demands. Of these ten demands, six have to be met, or he will pull out of the coalition, causing the fall of the Cabinet (Maarten van Rossem - De Podcast, 2025).

The first one is closing the borders for asylum seekers, because according to Wilders, 96% of asylum seekers enter our country via the safe neighbouring countries Germany and Belgium. This means, according to Wilders, that they are no longer fleeing war and violence but rather want to come to the Netherlands for economic reasons and will therefore be refused entry because Germany and Belgium are already safe (Maarten van Rossem - De Podcast, 2025).

The second demand is realising substantial additional border surveillance to ensure no more asylum seekers enter the Netherlands by deploying the military and army.
The third demand is putting a temporary stop on family reunification, following the Austrian example, because the Netherlands has reached its limits of reception capacity. Wilders claims that the Dutch social system, housing, health system, and education system are in danger of being overburdened by the large numbers of mostly non-western immigrants (Maarten van Rossem - De Podcast, 2025).
The fourth demand is that some status holders will be removed from the asylum centres, since a third of the people living in asylum centres are not asylum seekers but status holders. This creates more space for asylum centres to be closed down. The status holders will have to provide for their own shelter by either moving in with family or friends or, and I quote, "by moving in with the Dutch people who claim to be so concerned with the fate of these people" (Maarten van Rossem - De Podcast, 2025).
The fifth demand is sending Syrian asylum seekers and Syrian people with a temporary residence permit back to safe parts of Syria, which is supposed to happen as soon as possible and at most within six months. Wilders adds that this is preferably done voluntarily but otherwise involuntarily, and this concerns about 60,000 people (Maarten van Rossem - De Podcast, 2025).
The sixth demand is that no more asylum centres will be opened, but instead they will be closed down, which is possible if the aforementioned demands are activated (Maarten van Rossem - De Podcast, 2025).
The seventh demand is that the Dispersal Act should be revoked much quicker and that status holders should no longer receive priority in terms of social rental housing (Maarten van Rossem - De Podcast, 2025).
The eighth demand is that criminal immigrants should be deported much faster and illegal residence should be made punishable to protect public order and national security. Wilders wants to implement a 'one strike, you're out' principle when it comes to criminal immigrants, after which all immigrants who are convicted of one serious crime must lose their residency status and leave the Netherlands (Maarten van Rossem - De Podcast, 2025).
The ninth demand is that people with a double nationality that have been convicted of a violent or sexual offense will be denaturalised and deported out of the Netherlands. As of right now, this is not possible because several treaties stand in the way of implementing this, so Wilders wants the European treaty in matters of nationalities to be denounced by the Netherlands (Maarten van Rossem - De Podcast, 2025).
The tenth and last demand is that the police should be enabled earlier and more often around violence, demonstrations, and disorderly and violent demonstrations by using

violence. Wilders motivates this by saying that this is necessary because of pro-Palestine demonstrations, riots in Scheveningen during the fourth and fifth of May (national remembrance days in the Netherlands to commemorate the people killed during World War II and every war after that and the Dutch Liberation). Wilders wants the best policemen to pay attention to monitoring public order and, if necessary, use violence instead of paying attention to "having iftar meals and diversity trainings" (Maarten van Rossem - De Podcast, 2025).

Of these demands, at least six had to be passed, or the PVV would resign from the coalition, and because the coalition partners refused to cooperate with Wilders plans, the coalition fell on June 3rd, 2025. According to the House of Representatives (2025), VVD, NSC, and BBB responded sympathetically to Wilders plans but did not sign off on them outright, mainly because they doubted the feasibility of some of the plans. Prime Minister Schoof calls the collapse of the Cabinet "unnecessary and irresponsible" because the Netherlands has to deal with big national and international challenges, which means that now more than ever, decisiveness is required, and the last thing we can use is procrastination (Tweede Kamer der Staten-Generaal, 2025). Baudet, leader of a smaller far-right party FVD (Forum voor Democratie or Forum for Democracy), thinks the ten-point plan was the reason the Cabinet collapsed, because the measures Wilders demanded were largely already in the Hoofdlijnenakkoord. Instead, Baudet believes that the PVV was in bad faith and deliberately dropped the Cabinet on asylum and migration (Tweede Kamer der Staten-Generaal, 2025). Whatever Wilders' reasons may have been, the Netherlands is now preparing itself for new elections that will most likely take place on October 29th, 2025 (Peer, 2025).

The most recent Cabinet, which fell a month ago as this thesis is written, was supposed to bring the Netherlands "the most strict immigration and asylum policy ever." However, as discussed in this chapter, this promise was not kept. Instead of following through on the harsh plans they had for asylum seekers and immigrants, nothing besides a few inquiries and the swapping of blacked-out letters has taken place. The motivation was there, but the coalition could not produce any result, partly because the PVV failed to rally the support of his coalition partners behind him when he proposed an even stricter plan of demands than the Hoofdlijnenakkoord contained, and partly because certain laws and treaties were standing in the way. However, it should not be ignored that despite the coalition being unsuccessful in finalising any of their agreed plans, the attempts were there and the motivation is real.

Chapter Three: What are the similarities, differences, and connections between Dutch and Australian asylum policies and contexts?

After having taken a close look at the Australian and Dutch contexts when it comes to their immigration and asylum policies, it is time to find their similarities, differences, and connections to allow for a better and deeper comparison and analysis. I will do so by pointing out three main themes: deterrence-based kyriarchy, racism and Islamophobia, and neocolonialism. I will also point out one difference, which is the offshore detention system, but at the same time make a connection between the two contexts when it comes to this theme.

The first thing that is eerily similar between the asylum policies of Australia and the Netherlands is that they are deterrence-based. Not only do both countries want to stop migrants and asylum seekers from coming into the country, but they also want to deter and discourage others who are contemplating coming to their borders. As mentioned in previous chapters, Australia and the Netherlands have many tactics to make their countries seem as undesirable to immigrants and asylum seekers as possible. Both countries heavily guard their physical borders – Australia guards its coastal borders by intercepting refugees and asylum seekers trying to reach the shores by boat, and the Netherlands guards its borders with Belgium and Germany to check vehicles trying to enter the country to intercept "illegal immigrants" (Reporter, 2024) (Bureau Woordvoering Kabinetsformatie, 2024, p. 4). Both countries also actively stand in the way of family reunification, making it less appealing for families to seek refuge or apply for asylum in Australia and the Netherlands (Parliament of Australia, 2021) (Bureau Woordvoering Kabinetsformatie, 2024, p. 4). Furthermore, the rather harsh bills and measures that are either being accepted, debated on, or merely speculated about, which carry a large anti-immigration sentiment, in and of themselves give the impression of two unwelcoming and unaccepting countries. Australia and the Netherlands do not want any more asylum seekers to come into the country, and those that are already within their borders face oppression and stigmatisation in the form of detainment, deportation, the threat of not finding housing, being kicked out of asylum centres or emergency shelters, the threat of losing their visas, personal belongings, and governmental aid. The Australian and Dutch immigration and asylum systems seek to deter, oppress, and (forcibly) remove asylum seekers from their countries, and I argue that this is kyriarchy. As Behrouz Boochani posed in his book *No Friend but the Mountains*, Australia's offshore processing system is rooted in kyriarchy, as it encompasses multiple, interlocking kinds of oppression and stigmatisation, including racism, xenophobia, heteronormativity, economic- and faith-based discrimination, class-based violence, coloniality, Indigenous

genocide, anti-Blackness, and militarism (Boochani, 2018, p. 370). As explained before, I adopt this line of thinking in this thesis, as Boochani's book clearly depicts how the kyriarchal system of the detention centre on Manus Island functions and operates, which I have elaborated on in Chapter 1. However, I would like to argue that the Dutch immigration and asylum system, despite not being offshore, is also kyriarchal. Kyriarchy can be understood as a social system built around domination, oppression, and submission (Boochani & Tofighian, 2020), and this is exactly what the Dutch system is built upon. Asylum seekers and immigrants are the scapegoat for all kinds of problems in Dutch society, like the housing crisis, the rising costs of living, the crises in the health and education system, and violence and aggression, and Wilders had no problem saying this during his recent press conference (Maarten van Rossem - De Podcast, 2025). He even said that the Dutch 'straatbeeld' (neighbourhoods) has changed beyond recognition because of mass immigration and Islamisation (Maarten van Rossem - De Podcast, 2025). I argue that blaming national failures on asylum seekers is not only oppression based on racism and Islamophobia, but it can, and in some cases already has, lead to domination and submission in the form of dehumanising laws that aim to "cleanse" the country of asylum seekers and immigrants. This happens because claiming hardships are the result of letting asylum seekers stay in the country is fearmongering, as many Dutch people already worry about their own and their children's future when it comes to housing, healthcare, and education (Van Oudenhoven, 2025). Karen van Oudenhoven (2025), director of the Social and Cultural Planning Office, says that many Dutch people worry about immigration and asylum seekers because 'we first have to fix our own problems before we can help others.' Asylum has thus become the target of a polarised debate between political parties and in the public sphere. Yet in the polarised debate, attention to the real problems and their causes threatens to fade into the background, whereas that is what should be talked about. If this is not done, politicians can use immigration as the cause of the Dutch hardships, which can lead to a generally hostile outlook and attitude towards asylum seekers in the Netherlands. This system, politicians oppressing asylum seekers but also their voters by fearmongering, is a multilayered form of kyriarchy. Politicians instil fear into their voters, voters elect parties that aim to oppress asylum seekers, and politicians then need to lift the heavy burden of getting done what they promised their voters. Politicians need the help of the Royal Military Police and regular military to uphold and perform the plans made by politicians, which is another type of domination in and of itself. It is a complex vicious cycle of power dynamics and oppression that apparently caused the collapse of the most recent Cabinet and the one before that.

The second theme that both the Australian and Dutch immigration systems are rooted in is racism and Islamophobia. This is, in the case of the Netherlands, rather obvious. As mentioned in Chapter 2, Wilders blamed the problems in many spheres within Dutch society on non-western Muslims during his recent press conference in which he announced his ten demands for asylum and immigration policy, even specifically targeting young Moroccan and Syrian men (Maarten van Rossem - De Podcast, 2025). Wilders and the PVV keep repeating how we must 'reconquer the Netherlands from the migration "tsunami" (Partij Voor de Vrijheid, 2023). Furthermore, as was mentioned before, in the PVV's election manifesto, the continuous use of 'niet-westerse allochtoon' (non-western immigrant) makes it clear that they make a clear distinction between immigrants with a non-western background and immigrants with a western background, for example, Ukrainians. According to research done by the Ministry of Asylum and Migration, Ministry of Social Affairs and Employment, Ministry of Interior and Kingdom Relations, & Ministry of Foreign Affairs (2024), by the end of 2023, more than 110,000 displaced persons from Ukraine resided in the Netherlands, nearly 89,000 of whom resided in municipal shelters. Thanks in part to **the efforts of municipalities, security regions, schools, and various civil society organisations, adequate shelter and access to health care, education, and other facilities were provided for this sizeable group of displaced persons**. The government has focused on **(labour) participation and self-reliance.** This, in and of itself, is great and complies with the Geneva Convention, as it ensures the basic minimum standards for the treatment of refugees are met, like the right to housing, work, and education while displaced so they can lead a dignified and independent life. However, it is rather telling that the Netherlands does not want, or no longer wants, to provide non-western and/or Muslim people with this same treatment. One could argue that this favourable treatment towards Ukrainian refugees is based on the fact that Ukrainians are fellow Europeans, but international laws like the Geneva Convention do not differentiate between the nationality or ethnicity of refugees when it comes to how they should be received and taken care of.

Not only does the PVV label non-western immigrants as the cause of crises in Dutch systems, but it also claims immigrants, especially Moroccan and Syrian men, make the Dutch streets unsafe with criminality and violence. A recent study from the Centraal Orgaan opvang Azielzoekers (Central Agency for the Reception of Asylum Seekers) and the CrisisNoodOpvang (crisis emergency shelter), conducted between January 1st, 2017, and December 31st, 2022, points out that this statement is not true (Latenko et al., 2023). Persons residing at COA or CNO sites during the reporting period had the nationalities of

more than 170 different countries of origin. In 2022, the most common nationalities were **Syrian, Afghan, Turkish, Yemeni,** and **Eritrean** (Latenko et al., 2023). It is important to note that the nationalities with the largest share of occupation change over time. Nationalities included in the top 15 in 2022 but not yet among the leading nationalities in 2017 are **Yemeni, Nigerian, Pakistani,** and **Russian**. A large proportion (38%) of those residing at a COA or CNO site in 2022 had Syrian nationality, which makes it the most common nationality. In 2022, **83,000** unique foreign nationals stayed for some time at a COA or CNO location, and only a **small proportion** of them (7% and 3%, respectively) were involved in an incident or suspected of a crime during that year (Latenko et al., 2023). COA and CNO residents are mostly suspected of **property crimes**, like stealing, damaging, or destruction of another person's property, with **77% of registered suspects involved in this type of crime** in 2022. This percentage is higher than for the general Dutch population in 2022 (31%), while the proportion of registered suspects of **violent crimes** among COA and CNO residents is actually **relatively low**: 11% compared to 19% for the Dutch population (Latenko et al., 2023). Here it is important to point out that there are many demographic differences between these groups, including **age distribution and socioeconomic background**, that could possibly explain why the percentages differ so much from one another. Especially given that **men and young adults are also overrepresented among crime suspects in the general Dutch population.** Of the unique suspects in the Netherlands in 2021, only 1% were COA residents (Latenko et al., 2023). Statistics like this show that Wilders' claims are not entirely true. COA and CNO residents indeed commit more property crimes than the Dutch people do, but Wilders continuously mentions violence when he talks about immigrant criminality. In his press conference, he mentioned fights between immigrant groups in Scheveningen and on fairgrounds and violent pro-Palestine protests in Amsterdam multiple times (Maarten van Rossem - De Podcast, 2025). However, the COA and CNO research shows that their residents commit fewer violent crimes than the Dutch people do and that only one percent of all unique suspects of crimes in the Netherlands were COA or CNO residents (Latenko et al., 2023). Yet Wilders keeps pointing his finger towards these people, and given the fact that the largest group of immigrants comes from the Middle East and Africa, I do not think this is a coincidence but rather another anti-Islamic and racist motivation on Wilders part.

Australia's detention system is Islamophobic and racist as well. Similarly to the Dutch case, media coverage and political discourses influence the way the asylum seekers that reach Australia by boat are seen by the Australian society. For example, during the Tampa affair, the saved people were framed as "Muslim threats," feeding public fear and

stereotyping Muslims as associated with illegality and terrorism (Khorana & Thapliyal, 2024). This information disorder that dominates the current media ecology of Australia is produced by official agents, both state and media institutions, as well as social media content produced by local and global actors that perpetuate Islamophobic bias. This Islamophobia has been institutionalised in the public sphere in order to promote culturally supremacist discourses of traditional values as well as national security (Khorana & Thapliyal, 2024). The media and political landscape working together to depict Muslim and Global South asylum seekers as "queue jumpers," "terrorists," or "illegals" taps into long-standing white nationalist sentiments tied to Australia's colonial past and the White Australia Policy (Taub, 2014). The official name of this policy is the Immigration Restriction Act, but it is also known as the White Australia policy because that is exactly what it aimed to achieve. The law sharply limited non-European immigration, with the goal of maintaining Australia's "British" character and therefore keeping Asian immigrants out (Taub, 2014). This law was one of the first to pass when the Australian state first formed in 1901 and was only abolished in 1973, after which it was replaced with a new set of immigration laws that did not use race as a factor in eligibility for applying for citizenship or visas (Taub, 2014). However, it is not farfetched to state that the white supremacy that led to the creation of the White Australian policy has lingered and left the country with an aversion to letting in non-white immigrants. This is also confirmed by reports from staff and whistleblowers who have seen the conditions in the offshore detention centres, especially on Nauru and Manus Island, and described them as designed to "inflict incalculable damage" and deter future migration, with clear racialised dimensions targeting non-white immigrants (Hamilton, 2017). In an attempt to silence staff and whistleblowers that tried to speak out about the conditions in the detention centres, the Border Force Act was introduced, which criminalised disclosures from the detention centres, many of which housed many Muslim and non-white asylum seekers. By doing this, Australia effectively shields racist and abusive practices from public scrutiny and outrage, like systemic abuse, rape and sexual predation, violence by guards, corporal punishments, deprivations, and delays in moving acutely ill people to appropriate care (Doherty, 2018b). These practices, and the offshore detention centres in their entirety, have been ruled as violating human rights and laws by the UNHRC and other international bodies, pointing out how this country is tied up in lasting patterns of racialised abuse and exclusion (UNHCR, 2001). Yet, Australia continues down the trodden path and gives no impression that it wants to change its system.

The third theme that can be recognised when looking at both countries' immigration policies is that both of their systems uphold neocolonial connections with other countries. As mentioned before, neocolonialism entails the subtle propagation of socio-economic and political activity of a former colonial ruler aimed at reinforcing capitalism, cultural subjugation, and neo-liberal globalisation of a former colony (Afisi, 2017). The former colonial powers ensure that the newly independent countries remain dependent on them for political or economic direction and aid. This dependency on the colonial ruler's home state opens the previously colonised country to exploitation of their socio-economic and political lives for the economic, political, cultural, ideological, and military benefits of the coloniser's state (Afisi, 2017). This can be carried out through indirect control of political and economic practices in the newly independent states or directly through military control, which was present during the colonial era (Afisi, 2017). Neocolonialism might be more obviously present in the case of Australia, as it has detention centres beyond its own borders and works together with other countries to detain the immigrants that were sent away from the Australian coastlines, but the Dutch case fits the narrative as well. Australia's offshore processing system, or Pacific Solution, leaning heavily on small Pacific states like Papua New Guinea and Nauru, is neocolonialism because these small countries rely heavily on Australian aid. This creates an imbalanced relationship that echoes colonial dependency and skewed power dynamics (George et al., 2024). Through the Pacific Solution, Australia breaches territories and asserts control over regional centres in countries like Nauru and PNG, effectively extending its border enforcement extraterritorially, which is a hallmark of neocolonial control (George et al., 2024). It is important to note that both PNG and Nauru are former Australian colonies, and so the neocolonial control that Australia has on both states today does not exist in a vacuum. Nauru gained independence on January 31, 1968, after having been colonised by Germany from 1886 until World War I, after which Australian forces captured the island (Buchanan, 2018). During World War II, Japan occupied Nauru between 1942 and 1945 (Buchanan, 2018). Papua New Guinea's colonial history with Australia began in 1906, even though control over the territory transferred several times during the World Wars (Yacoub, 2018). In 1951, Australia established a Legislative Council, without any indigenous ministers, based on an Australian model. Even though PNG became fully independent in 1975, Australia has since maintained a strong strategic interest and engagement in local affairs as the territory's biggest aid donor (Yacoub, 2018). A distinct example of neocolonialism is the fact that extraterritorial projects like the Manus Island detention centre are imposed onto the local communities with minimal consultation or negotiation (Yacoub, 2022). The people living on Manus Island say that Australia's detention centre on their island has 'broken the social fabric' of their community, which is

a type of harm that represents a long colonial history drenched in geopolitical interests that are prioritised over the well-being of human beings (Yacoub, 2018). Australia also uses PNG and Nauru for selective sovereignty and moral hypocrisy by evading responsibility for the atrocities happening within their offshore detention centres by claiming it is not responsible for the fates of the people that they have sent away, as mentioned before (Doherty, 2025).

The Dutch immigration system is deterrence-based, racist, and Islamophobic, but also neocolonial despite not having any offshore detention centres like Australia has. The Netherlands has a long history with colonialism and slave trade, with extensive former colonies in the regions that we now know as Indonesia, South Africa, Curaçao, New Guinea, Suriname, and beyond (Pound, 2022). The Netherlands became incredibly rich during the so-called "Golden Age" over the backs of many enslaved men, women, and children, and this permeated every level of society, both in the colonies and on home soil (Pound, 2022). The neocolonial behaviours in Dutch immigration policy start, first and foremost, with the framing of immigrants, especially those from former colonies, as needing assimilation into a "white Dutch" norm. This reinforces racial hierarchies rooted in colonial ideology (Ghorashi, 2024). The racialised discourse that portrays migrants as inferior, backward, foreign, and in need of "white assimilation" is Orientalist (Said, 1995). Connected to the condescending view of immigrants is the need for outsiders to prove their loyalty to the Netherlands by assimilating into a "homogenous Dutch identity," which in and of itself reflects that same colonial mindset (Ghorashi, 2024). An example of this is the selective recognition of postcolonial nationals, like Surinamese-Dutch or Moluccans. Since the 2000s, the Netherlands requires third-country nationals to prove they have sufficient knowledge of the Dutch language and society as a prerequisite for obtaining an entry visa, naturalisation, and permanent residency (Westra & Bonjour, 2022). However, Dutch is the official language in Suriname, yet Surinamese people are still required to pass the pre-entry civic integration exam if they have not completed primary education in Suriname because Dutch being the official language "does not guarantee that Surinamese people have learned to speak Dutch there" (Westra & Bonjour, 2022). This is interesting because nationals from a series of wealthy countries where no Dutch is spoken at all, including Australia, Japan, and the USA, are exempted from this exam without further conditions (Westra & Bonjour). Bonjour (2020) argues that this reveals the rather paradoxical nature of civic integration policies, which "focus on civic education that should ease migrants into the nation" but at the same time "project an image of the nation that excludes the possibility of racialized outsiders ever truly belonging. Bhabha's (2004) concept of 'mimicry' fits here, describing colonial

governments' attempts to make colonial subjects adopt European lifestyles, worldviews, and religion, while at the same time believing that "true civilisation" was out of reach for colonialised subjects because that would make them equal to Europeans, leaving European colonialism as illogical. Aside from the mandatory exams, language requirements, and residency obligations that burden migrants of colour more than anyone else, the Netherlands also actively participates in EU efforts that rely on partnerships with non-EU states to detain migrants, as mentioned in the literature review.

Lastly, a difference between the two cases is that the Netherlands does not have any offshore detention centres as of July 2025, but I argue that while this is a difference, there is still a connection. In June 2025, the Netherlands and other EU member states asked the European Commission to come up with a proposal that should ensure that fewer people end up coming to the Netherlands by facilitating asylum applications in 'safe third countries.' The Ministry of Asylum and Immigration (2025) states that changing the 'safe third country' concept will make it easier to decide which asylum request is not going to be considered because there is another safe country the asylum seeker in question can go to. This way, if an agreement exists with a third country, the asylum application will not have to be processed in the Netherlands or the European Union. While this is not offshore processing in and of itself, it has the real potential of enabling it elsewhere. Furthermore, it talks about hosting "return hubs" for asylum seekers that have been rejected by the Netherlands in Uganda (Nicolosi, 2024). This plan was influenced by the PVV and mirrors the Italy-Albania and UK-Rwanda models. While these hubs are intended for individuals who have already been rejected and not for new arrivals like in the Australian system, they still lay the groundwork for extraterritorial containment. So while there are no current "return hubs" in Uganda for asylum seekers rejected in the Netherlands, there is a clear desire within the Dutch political climate to discover the options of offshore processing.

All in all, both the Australian and Dutch (offshore) asylum and immigration systems are deeply deterrence-based and rooted in racism, Islamophobia, and neocolonialism. These systems are designed to keep non-white, Muslim people out of their countries, or at least make it incredibly difficult and unrewarding to apply for visas or citizenships. The research above shows that this is done deliberately and systemically by passing harmful laws and policies, engaging in racist and Orientalist framing in media and politics, and denying or shifting the blame when called out.

Chapter four; Discussion of the research questions

In this section of the thesis I will answer my main research question by answering the sub-questions that I have presented in the introduction in light of the preceding research and discussion. After that, I will present my main argument.

This thesis' main research question is

> *What is the relationship between growing far-right politics and increasingly deterrence-based asylum policies in the case of Australia and the Netherlands?*

In order to answer this rather large question, I have created three sub-questions. I will answer these one by one.

> *1. How does the Australian offshore asylum processing system operate and what are its consequences?*
>
> *2. How does the Netherlands handle immigration and in which ways is this influenced by the increasing far-right political landscape?*
>
> *3. In what ways are Islamophobia, racism, and neocolonialism intertwined with the Dutch and Australian motivations to outsource the migrants that attempt to cross their borders?*

Sub-question one: How does the Australian offshore asylum processing system operate and what are its consequences? As I have laid out in Chapter One, the Australian offshore asylum processing system was set up in the early 2000s to deter immigrants from coming to Australia by boat. Those who did arrive by boat, who are often immigrants from the Global South fleeing war or other inhumane living conditions, were then immediately deported to detention centres on Papua New Guinea and Nauru. The people deported are often held there indefinitely without trial and exposed to several human rights violations like being exposed to physical and psychological abuse, sexual assault and rape, dehumanising treatment from staff, denial of adequate medical attention, and filthy and dangerous living conditions. The system operates this way to not only keep out the immigrants that Australia does not wish to welcome beyond its borders but also to deter more immigrants from making the journey. They achieve this by, as Boochani laid out in his book *No Friend but the Mountains,* using the media and political spheres to portray the detainees as "threats" and by erecting laws that protect Australia from civil courts and responsibility. The system has very real consequences, one of them being that the detained people on Nauru and PNG are met with human rights violations as they are held in the centres for years. Detainees are at risk of being abused or even killed, which is why many, even children, resort to self-harm, suicide (attempts), and/or hunger strikes. The

offshore detention centres do not only have gross human rights violations as their result; they also affect the local communities of Papua New Guinea, Nauru, and Manus Island, 'breaking the social fabric' and keeping these territories and their peoples wrapped up in neocolonial connections with Australia.

Sub-question two: How does the Netherlands handle immigration and in which ways is this influenced by the increasing far-right political landscape? Currently, and recently, the Netherlands has not been handling immigration very well, and it is nearly entirely influenced by the increasing far-right political landscape. In July 2024 the most recent Cabinet came to be, which has fallen eleven months later. This Cabinet, with the coalition consisting of the PVV, VVD, NSC, and BBB, promised to deliver the "strictest immigration policy the Netherlands has ever had," and proposed plans to opt out of the Alien Act of 2000 on the grounds of Sections 110 and 111, which allow for that to happen in crises. They also wanted the activation of a temporary Asylum Crisis Law with crisis measures like the abolition of the Dispersal Act, which worked rather well to relieve the pressure on the municipalities that hosted many asylum seekers and helped spread the number of asylum seekers across the entire country. Border control and safety would become much stricter to stop immigrants from crossing the border via Germany or Belgium by vehicle. The Coalition also wanted to opt out of the European asylum and migration policy with other like-minded EU member states. A list of measures that would make the Netherlands belong to the member states with the strictest admission rules of Europe contained more border control, tightening the admission procedures, stopping family reunification, punishing criminality under asylum seekers even more, and encouraging return to safe third countries, forced if the person in question refuses. Wilders from the PVV stood up long after the Hoofdlijnenakkoord was signed and agreed on by all Coalition parties and demanded that six of his new ten measures be accepted, which included measures similar to the Hoofdlijnenakkoord but would hopefully speed things up. The Coalition refused to cooperate, after which Wilders pulled out of the Coalition, letting it collapse. Now the Netherlands has a demissionair Cabinet, one that cannot pass any new laws, until the next elections have been held and a new Coalition has been formed.

Sub-question three: In what ways are Islamophobia, racism, and neocolonialism intertwined with the Dutch and Australian motivations to outsource the migrants that attempt to cross their borders? The Dutch immigration system is inherently racist for multiple reasons, with the first one being the deeply racist and Islamophobic leader of the biggest party – the PVV. The PPV is extremely Islamophobic, wants to ban mosques, the Qur'an, and Islam as a whole, continuously blames violence, crime, and public nuisance

on young immigrant men, especially those with a Middle Eastern background, and wants to send as many Syrians back to their unstable home country as soon as possible. Furthermore, does the Dutch government differentiate between Ukrainian asylum seekers and non-western asylum seekers, reiterating this racist ideology that white people are welcome but non-western people, usually of colour, pose a "threat". This can be seen in the way postcolonial immigrants are treated in the Netherlands, where people from Suriname still have to pass a Dutch language test despite the official language in Suriname being Dutch, purely because "it cannot be assumed that Surinamese people speak the Dutch language well," while certain other nationalities (associated with the wealthy Global North) do not need to pass this test at all. This is not only racist, it is also neocolonial and upholds the idea that those who are not European should become European but can never actually attain the expectations because that would put them on the same level as Europeans.

Australia's offshore asylum processing system is also rooted in racism, Islamophobia, and colonialism. The country continuously depicts the immigrants arriving by boat as "Muslim threats" and "queue jumpers", instilling fear into the Australian people and thus justifying the horrible conditions in which the detained immigrants are kept on PNG and Nauru. Australia has a long history of white supremacy, including the White Australia Policy, that shines through in the way the mostly non-white detainees on PNG and Nauru are treated. Whistleblowers have reported the inhumane treatment and abuse that the detainees suffer at the hands of the Australian Pacific Solution. Important to note is that this abuse bleeds through into the local communities of PNG and Nauru, both territories that were former Australian colonies. The detention centres break up the local communities, and the territories are, despite being independent from Australian rule, still relying heavily on Australian aid, maintaining the colonial power relations that were established in colonial times. Therefore, the Australian offshore asylum processing system is not only racist and Islamophobic but also deeply neocolonial.

Having answered the sub-questions, I can now answer the main question posed in this thesis.

> *What is the relationship between growing far-right politics and increasingly deterrence-based asylum policies in the case of Australia and the Netherlands?*

The truth is, the growing far-right political movements in both the Netherlands and Australia are inherently intertwined with the current deterrence-based asylum policies. Right-wing politicians influence the political sphere to view non-western immigrants, asylum seekers and refugees as the biggest cause of the problems within the country:

scarcity in the housing market, pressure on the health care and education system, rising costs of living, rising criminality, and concerns surrounding the job market. Even though research shows that the immigrants coming in do not cause these problems, right-wing politicians claim the opposite to appease the worries of their voters. Non-western Muslim asylum seekers have become the scapegoat, and both countries are motivated to deter and deport as many of them as possible to give the impression that this is what is needed to fix the countries' problems. However, this leads to racist and Islamophobic rhetoric, which creates this vicious cycle that puts these same far-right politicians back in power. Immigration and asylum are deeply political topics and therefore cannot be separated from one another, and because racism, Islamophobia, and neocolonialism are also deeply political topics, this, too, is intertwined and ingrained in asylum policy. This is the case for the Netherlands, Australia, and many more EU countries.

Conclusion

In this thesis I have conducted research on the Dutch government's motivations and plans to create the 'strictest immigration policy' that the Netherlands has ever had. I did this to shed light and raise awareness on the current and future threat the far-right Dutch political climate poses to immigrants and refugees. I have done this by collecting data from governmental and political institutions and analysing them critically.

My general aim was to analyse in what ways the Netherlands is trying to keep asylum seekers, immigrants, and refugees from coming into the country and at the same time send away those that are already here, and compare and contrast this to the Australian offshore asylum processing system. One of my objectives was to fully flesh out what Australia's 'Pacific Solution' entails and how it subjects the asylum-seekers that fall victim to this model to a kyriarchal system. Another objective was to connect the Dutch "strictest immigration policy ever" and the Australian offshore asylum processing system with the rising far-right political climate of both countries at hand. More specifically, I have connected the wish to outsource migrants to Islamophobia and racism. Lastly, I incorporated a colonial lens to Australian and Dutch asylum processing systems, as both countries at hand have a long and complicated history regarding (settler) colonialism. My objective was to uncover how colonialism is wrapped up in the offshore asylum processing system and outsourcing of migrants to other countries and how this perpetuates colonial systems and relations between countries and peoples. I have been able to answer all the research questions I set up by the research I conducted. Even though I am content with the work done, there still are some limitations to my research.

I have used documents that are publicly available, and therefore I might have been unable to capture all important aspects of policymaking. Furthermore, I have collected sources in Dutch and English, which may result in me possibly having missed out on relevant sources in other languages, which could have caused me to miss out on relevant sources for the discourses in other (EU) countries. Regarding languages, because this thesis is written in English, I had to translate Dutch texts to English in order to convey their meaning. During this translation process, some subtle intonations, meanings, or emphases could have been lost because there simply is no direct translation for them, yet I tried my best to preserve these as much as possible. Sometimes I have literally translated certain texts, and other times I chose to paraphrase to keep as much of the original texts' meaning intact.

As of right now, the topic of stricter asylum policies and offshore processing systems is very contemporary and changing rapidly. The fall of the Cabinet, for instance, happened when I was already in the process of writing this thesis. I chose to include it because I believe it to be incredibly important and valuable to the research I was doing, but I also recognise that right now, Dutch politics are at a crossroads. Things can get a lot better or a lot worse quick, and this is not just the case for the Netherlands. Therefore, I would recommend more research to be done on this topic in the future, because developments are made every week in very different contexts. I would advise further research to be done on the case in the USA, where rather concerning things surrounding immigrants are going on, like the detention facility Alligator Alcatraz in Florida, which is not only built on indigenous land but also "as secure as it can be because if someone escapes, they will be met with a lot of alligators" (Bailey et al., 2025). This was not the focus of my thesis, which is why I did not include it, but it is certainly a discourse that could use some serious research. However, extensive research on what the effects of offshore processing are on the third countries is also important. I would advise focusing on one or two countries and finding out what the consequences are of the selfish neocolonial desire of western countries to shift their immigration "problem" to third countries.

With this thesis, I really want to increase the awareness of my fellow Dutchmen, but idealistically everyone who wants to learn and listen when it comes to the unfair treatment of asylum seekers, refugees, and immigrants worldwide. I chose to write about this topic because it matters a lot to me, and I wish more people cared about the human beings that are constantly portrayed as "threats" to our "perfect western societies." I watch the European countries become more and more far-right with every passing day, I hear deeply concerning things coming from the United States when it comes to the deportation of immigrants, I hear more and more people engage in discussions about the basic human necessities and whether or not certain people deserve them, and I feel a deep, sinking feeling of dread and fear for the future. I was taught to learn from our mistakes, to remember and never forget the atrocities that humans have done to other humans, to brothers and sisters. Yet, I witness how this apparently does not apply to certain kinds of peoples. There is so much hate, anger, uncertainty, fear, and distrust that we can barely see that the 'alien' we read about in the papers or on our favourite politicians' social media posts, is just another mother, father, son, or daughter like ourselves. People with hopes, dreams, jobs, families, and histories. We cannot see this; we do not care. We have our own problems, and it is better to project our country's failures onto those we do not wish to have around than to accept that our systems are simply not working.

Lest we forget.

Opdat wij nooit vergeten.

But we are forgetting. We are actively looking the other way, not wanting to see what is going on right now, under our noses, at the hands of people we put into office. How far does it have to go before we collectively decide it has been enough? Humanity always seems to be too late to realise things have gone too far, and this is exactly why I am watching this unfold in terror. This thesis will probably only be read by a handful of people, and thus I am contributing only a pittance to raising awareness for this deeply disturbing issue, but I have knowledge now. I will try and educate people, my friends, family, and anyone who would like to listen, one conversation at a time. Because I care, deeply, and I hope that others will, too.

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