"The rich become what they what, and the poor suffer what they must": Stratified Migration and Citizenship

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Immigration is a lever of economic policy for many countries. Effective policy-makers make choices through their immigration laws to attract actors they find most likely to contribute to the local economy. It is not unusual to find such immigration laws and policies prescribing different requirements for economic migrants with different backgrounds and skills. Several countries also establish entrepreneur and investment programs to attract migrants with capital. Such tiered systems of migration, by themselves, may not be objectionable. However, objections may arise when economic migrants under the different tiers and categories are treated unequally. This discriminatory treatment may be most starkly felt in terms of the differentiated paths to long term residency and citizenship in the host country.

In this chapter, we examine the relationship between immigration regimes, focusing specifically on tiered immigration with divergent pathways to long-term residency and citizenship, and the conception of citizenship. In particular, we argue that immigration laws can have a distinct impact on the self-perception of citizens of their own citizenship. Our primary case study is Singapore, whose complex immigration regime differentiates between 'low-skilled' migrant workers, on the one hand, and 'skilled' professionals, on the other. While the former are treated as transient migrants, the latter tend to be regarded as potential citizens – a dichotomy which undergirds every aspect of the respective laws and policy that govern their presence and rights in Singapore. Further contrasts can be drawn with, respectively (i) Singapore's favorable schemes to attract high net worth individuals to reside in the country, offering them an expedited pathway to citizenship and (ii) barriers to residency and citizenship faced by economically disadvantaged marriage migrants ('nonresident spouses').

Systems of tiered or 'managed' migration have, as will be explained below, largely been studied in the context of North America, Europe and Australia, particularly in countries characterized as liberal democracies, and in which context stratified migration has been analyzed as a backlash and/or challenge to multiculturalism and 'postnationalism'. In contrast, Singapore is a postcolonial Southeast Asian state in which multiculturalism was a key pillar of 'nation-building' from the beginning. As such Singapore's immigration and citizenship policies offer rich material with which to explore crucial issues in relation to the construction of citizenship and identity in a context other than a 'Western' liberal democracy in which multiculturalism is understood to be relatively new. Furthermore, Singapore continues to have a large migrant population. Low-wage migrant

workers make up one-third of Singapore's total workforce and nearly one-fifth of its population.[1] Approximately one in four citizen marriages is between a Singapore citizen and a 'non-resident spouse' of the type referred to above.[2] Singapore thus presents a fruitful study of stratified migration and – as we will argue – the distinct impact that immigration regimes can have on the self-perception of citizens of their own citizenship.

Part I sets the context on a common approach to economic migration, what we call stratified migration here but also elsewhere referred to as 'tiered' or 'managed' migration. Part II employs the case study of Singapore to illustrate the connection between immigration policy and its impact on citizenship. In particular, we examine how stratified migration gives rise to what Ellerman identifies as 'human-capital citizenship'.

I.   ECONOMIC MIGRATION: STRATIFICATION VS. DISCRIMINATION

Many countries employ immigration laws as a lever of economic policy, including sorting economic migrants into different tiers based on conceptions of how they benefit the local economy. Many postwar economic immigration regimes throughout the Global North were designed on the basis of labor market demand, with economic admissions fluctuating with the state of the economy.[3] In North America and Australia (which Ellerman terms 'settler-colonial states'), this took the form of the permanent admission of in-demand 'skilled' workers, complemented by smaller temporary foreign worker programs for in-demand 'low-skilled' workers. In contrast, policies in Western Europe (which she terms 'guest worker states') were defined by 'low-skilled' temporary worker programs that precluded a path to permanent residence and/or citizenship. The German *Gastarbeiter* scheme, for instance, produced millions of Turkish migrants with no paths to citizenship for decades.[4]

Bonjour and Chauvin (writing generally but largely drawing on references to Western Europe) describe how systems of economically tiered or selective migration follow the logic of 'migratory utilitarianism'.[5] For Kofman, these 'managed migration' regimes are characterized by (i) the aim to derive the greatest benefit from economic globalization by selecting migrants on the basis of their utility to the economy and (ii) to apply, as far as possible, the same economic and political calculus to all forms of migration, including those derived from normative principles (such as

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[1] Ministry of Manpower, 'Foreign workforce numbers' (last updated 15 September 2021); Ministry of Manpower, 'Summary Table: Labour Force' (28 January 2021); Department of Statistics of Singapore, 'Singapore population'(last updated 28 September 2021).

[2] Association of Women for Action and Research, 'Migrant Wives in Distress' (1 June 2020).

[3] Ellerman (2020b), 2520.

[4] https://www.economist.com/europe/2021/11/06/sixty-years-of-turkish-guest-workers-in-germany; Feyzi Baban (2006) From Gastarbeiter to "Ausländische Mitbürger": Postnational Citizenship and In-Between Identities in Berlin, Citizenship Studies, 10:2, 185-201, DOI: 10.1080/13621020600633119

[5] Bonjour and Chauvin (2018), 9.

family migration and asylum). Kofman as well as Morris argue that, in pursuing these objectives, states have constructed an ever more elaborate edifice of 'civic stratification' in which specific categories of migrants have different rights of entry, residence and access to citizenship.[6] In particular, the application of economic rationality to all forms of migration has meant that citizens' right to family life has become undermined by a competing logic under which family immigrants are (de)selected on the basis of market based criteria.[7] Class has become the main determinant of access to family migration.[8]

These arguments by Kofman, Morris and Bonjour and Chauvin are borne out in country-specific studies. Simon-Kumar argues that, despite the political rhetoric of 'inclusive' multiculturalism in Aotearoa/New Zealand, economic logic has increasingly become the dominant criterion that rationalizes the direction of migration.[9] Bonizzoni characterizes the Italian labor regime as a 'bifurcated regime of deservingness', having shown a shift towards selecting 'highly skilled' migrants in a competitiveness driven frame but which has been 'largely dominated by the recruitment of a low-skilled workforce'.[10] Bajt, writing in the Slovenian context, indicates significant differences between migrants based on the specific statuses assigned to them by policy; highly skilled, well-educated migrants habitually face fewer restrictions in terms of entry requirements and labor market access.[11]

The rise of 'migratory utilitarianism' or 'managed migration' described in the above literature has been attributed to or associated with the 'paradox of universalism', i.e. the tension between, on the one hand, universalistic personhood rights proclaimed within the framework of liberal-democratic values and, on the other hand, and the continuing need of the nation-state, in determining the entry of migrants, to define the particulars of membership.[12] The states resolves this tension through classification, selection and stratification in the immigration system, which seeks to filter, as far as possible, welcome from unwelcome strangers.[13] Seen in this light, managed migration has arisen *in response* to various streams and types of migration, particularly as a pushback against 'postnationalism', which posited the weakening of the nation-state as a normative force.[14] In this context, the rise of stratified migration has been strongly tied to the 'death of multiculturalism' in Europe.[15]

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[6] *See* Kofman (2005), 455 and Morris (2001), 388.
[7] Ellerman (2020b), 2516.
[8] *See generally* Kofman (2018).
[9] Simon-Kumar (2020).
[10] Bonizzoni (2018).
[11] Bajt (2016), 59.
[12] Joppke (2010), [ ].
[13] Kofman (2005), 457.
[14] Kofman (2005).
[15] Bajt (2016), 53; Yuval-Davis, 570; Kofman (2005), 464.

Indeed, skill-based immigrant selection can be seen as non-discriminatory since "inclusion and exclusion were seen to operate solely on the basis of individualist, rather than collectivist, criteria."[16] This means, as Joppke puts it, "the state may consider the individual only for what she does, not for what she is.…The individual is selected according to "achievement," not "ascription," that is, according to her agency rather than according to what she is immutably born with'.[17] However, in reality, highly differentiated skills-based immigration maps on to existing social hierarchies, which continues to produce discriminatory results.[18] This is especially since "status precarity", long associated with undocumented and temporary immigration status, has penetrated all immigration status even those considered legally secure.[19]

However, the pushback against 'postnationalism' only explains the impetus *to* classify, select and stratify welcome from unwelcome strangers. It does not explain why the *criterion* for such classification, selection and stratification has increasingly been the perceived economic utility of aspiring migrants. This has to be traced instead to the rise of neoliberal policy agendas, which conceptualizes the person in terms of their economic value,[20] rather than as bearers of rights, dignity, culture, and social capital. The neoliberal transformation of state and society affects how the individual is conceptualized, and the relationship among them. High-skill selection biases within immigration systems respond to this neoliberal market logic, thus, constructing those with low economic value, as well as non-economic migrants such as refugees and asylum seekers as fiscal threats.[21]

This neoliberal market logic underlying stratified migration schemes also pervade notions of membership, inclusion, and citizenship. Ellerman's proposed category of human-capital citizenship captures this. As she explains, "the logic of human-capital citizenship is anchored in the individual's market value" whereby "citizenship privileges are extended to highly skilled workers as the drivers of economic growth, with their wages treated as indicators of productivity". [22] Ellerman's human-capital citizenship has several implications: first, it has transformed economic immigrant admissions in ways that have stratified core rights – most importantly access to residence and family reunification – by skill level rather than by economic contribution; second, economic considerations are increasingly applied to immigrants who arrive through non-economic streams.[23] As 'the desirability of immigrants has come to correspond to

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[16] Ellerman (2020a), 2463.

[17] Christian Joppke (2005), 2–3.

[18] Ellerman (2020a), 2464.

[19] Rajkumar et al. 2012, Ellerman 2020a, 2464.

[20] Ellerman (2020b), 2516-2517

[21] Ellerman (2020a), 2516; Anderson 2013; Huot et al. 2016

[22] Ellerman (2020a), 2518.

[23] Ibid.

their rank in the human-capital hierarchy', longstanding empirical and normative distinctions between economic and noneconomic immigration are increasingly blurred.[24]

Human-capital citizenship is both a *logic* of membership and a membership *status*. As a logic of membership, human-capital citizenship imagines citizens as bearers of human capital, and human capital as the skills and psychocultural attributes associated with high-status and highly paid positions in the global knowledge economy. As a membership status, human-capital citizenship renders the link between membership and its benefits conditional and tenuous, transforming rights into earned privileges.[25] Accordingly, human capital citizenship can produce discriminatory trends among citizens vis-à-vis other citizens as well as vis-à-vis migrants, especially against those whom they perceive to have lower social status. This neoliberal market logic could explain the highly contradictory position taken by citizens against migrants conducting low-paid, low-skilled work, thereby freeing them up from low-paid jobs, but whose presence is often seen by them to be most threatening.

The Singapore case study provides an important window into the dynamics of human-capital citizenship, and its paradoxical discriminatory tendencies. Singapore's stratified migration regime very much employs the logic of human-capital citizenship, with consequent challenges for the development of any 'thick' notion of citizenship necessary in its particular multicultural context.

II.   STRATIFIED MIGRATION IN SINGAPORE

A. *The Economic Logic behind the Immigration Policy*

Singapore is often described as an 'immigrant nation'.[26] Pre-colonial Singapore had a small native population – albeit situated in a region characterized by diverse population flows and settlement as a result of Indian Ocean trade[27] – when the East India Company established a trading colony in 1819. The colonial government's 'Open Door' policy – aimed at providing labor for trade, agriculture, tin-mining, and infrastructure construction – led to the arrival of large numbers of immigrants from within the Malay Archipelago as well as from India and China.[28] Thus, Singaporean demographics today are shaped by the immigration flows of a mix of Chinese (initially only from China, but later also from Malaysia), Indians from the Indian Subcontinent (and subsequently from Malaysia), Indonesians from the then-Dutch East Indies, later Malays from Malaysia, as well as the British and other European communities.[29] Managing this multicultural mix was a key factor in Singapore's post-independence project. At the same time, controlling the

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[24] Ibid.
[25] Ibid.
[26] See eg Cheng (2017).
[27] Frost and Balasingham-Chow (2009), 84-118.
[28] Yeoh and Yap (2008), 1278.
[29] Saw SH (2012), 28.

population numbers was essential for the city-state without natural resources. Strict immigration policy immediately post-independence was imposed to control the country's high population growth and unemployment rates, given its limited land area and natural resources. The economic logic of the immigration policies was clear from the start. Immigration was limited to those who could contribute to its industrialization and socioeconomic development.[30]

The discretionary powers that the government exercises over immigration policies allows it to calibrate them according to the economic conditions in the country. Thus, when Singapore experienced high economic growth in the 1980s and 1990s, immigration policies were relaxed to attract economic migrants, especially those who are able to take on low-skilled jobs that increasingly affluent and well-educated Singaporeans were reluctant to fill. These included jobs in manufacturing, construction, and domestic service. This liberalization was justified as a measure to make up not only for the shortfall in births due to persistent below replacement fertility, but also the loss of talented Singaporeans through emigration.[31] To add another layer to the economic logic of Singapore's immigration policies is the increasing populist anti-foreigner sentiment fanned by opposition parties in the increasingly democratizing state. This meant that since the 2010s, the government had to widen the gap in the perceived privileges of citizens versus the rest, and tightened the admission criteria for permanent residency and new citizens. We will discuss this further below.

B.   *Stratified Immigration Policies and the Neoliberal Logic*

While the economic conditions shapes Singapore's immigration policy, the underlying philosophy has tended towards neoliberalism. This is reflected for instance in Singapore's legal framework for economic migrants, a 'bifurcated' scheme which draws a sharp distinction between 'highly skilled' and technically qualified economic migrants and 'unskilled' or 'low-skilled' ones.[32] The latter are governed by the Work Permit scheme, under which workers (commonly referred to as "migrant workers") are issued with one or two-year contracts that are tied to a specific employer and sector, which are subjected to renewal on a regular basis. According to the Singapore government, these limits are an "administrative control" to ensure that the workers "remain transient and do not sink roots in Singapore."[33]

This has meant that the recruitment, mobility, and working conditions of migrant workers are in turn heavily regulated to ensure this transiency.[34] Migrant workers are not allowed to change jobs unless their existing employer consents to the change, which he or she can unilaterally withhold

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[30] "Budget, Immigration."

[31] Yap Mui Teng, "Brain Drain or Links to the World: Views on Emigrants from Singapore," *Asian and Pacific Migration Journal* 3, 411 (1994): 411-412.

[32] Yeoh (2006).

[33] Ministry of Manpower (2012).

[34] Neo (2015), 143.

without reason. Significantly, the time that they spend in Singapore – as long as 10 to 20 years – does not count towards the residency requirements for permanent residency that could lead to citizenship. Work Permit holders need prior approval of the Ministry of Manpower to marry a Singapore citizen or a permanent resident (PR).[35] This applies even if the marriage takes place outside Singapore,[36] and even after a person has ceased to work in Singapore.[37] The Ministry has broad discretion in granting approval. Factors taken into consideration include the economic contribution of the applicants, the ability of the applicants to look after themselves and their family without becoming a 'burden' to the society or state.[38] These conditions have caused some hardship for couples who have not been able to obtain approval to marry.[39]

The policing against migrant workers developing 'roots' in Singapore is further borne out by the prohibition against female domestic workers getting pregnant or delivering any child in Singapore during and after the validity period of their Work Permits, unless the worker was already married to a Singapore citizen or PR with prior Ministry approval.[40] If a Work Permit holder becomes pregnant, her employer is required to report it to the government, in which case her work permit may be cancelled, and she would be repatriated to her home country. It has been observed that this policy not only prevents work permit holders from establishing their family in Singapore, but also is likely to drive them to seek abortions outside legal channels.[41]

In contrast, economic migrants who fall under other work visa categories (primarily defined by respective salary ranges) are seen as potential long-term residents and potential citizens. They are entitled to bring their dependents to Singapore (subject to certain criteria such as income levels) and are eligible to apply for permanent residence after a fairly short period of working Singapore. They are afforded relative flexibility in changing jobs while in Singapore and are not subject to the prohibition on marriage to citizens and PRs.

In state rhetoric, this is based on a perceived need to attract the 'right people'. In the words of the then-Prime Minister in 2010, 'had our ancestors not come here, today, Singapore would not exist, so we have to continue to be open today so that we bring in the right people, manage the difficulties whatever they may be so that a generation from now, Singapore will be *thriving and prospering*' (emphasis added).[42] The 'right people' thus refers to a specific population that enables economic prosperity through 'the infusion of knowledge which foreign talent will bring'. [43] This instrumentalist neoliberal logic is even starker in relation to benefits-for-visas schemes to attract 'the right people'. The use of favourable schemes to attract individuals that could provide benefits

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[35] Section 3, Employment of Foreign Manpower Act.
[36] Fong (2002).
[37] Heng (2014).
[38] Ng (2013).
[39] Han (2014).
[40] Part VI, Employment of Foreign Manpower (Work Passes) Regulations 2012.
[41] Seow J (2015); Liew and Teh (2010).
[42] Teo (2019), 170.
[43] Ibid.

to the country, be it investment, high expenditure, sports medals, or star power is a common thread in Singapore's admission policy. The government's justification for courting wealthy individuals and their families is that their presence would translate into greater benefits for Singaporeans. Wealthy individuals are therefore exempt from the requirements of commitment, judged instead primarily by their putative contribution to Singapore's economic wealth. They, and their families, are fast-tracked permanent residency as an incentive for them to invest and relocate.[44] The Global Investor Program (GIP) seeks to attract foreigners to invest a minimum of S$2 million in Singapore by granting them permanent resident status. In 2005, it was further liberalized to allow and encourage "foreigners to bring their assets and families to Singapore."[45] Spouses of investors and their unmarried children (under the age of 21 years old) could apply for permanent residence as part of their GIP application.[46] Prior to 2012, ultra-high net worth individuals and their families could have also applied for permanent residency under the Financial Investor Scheme (FIS), which was introduced in 2004 to entice rich foreigners with a net worth of at least $20 million to invest at least $5 million with financial institutions registered with the Monetary Authority of Singapore.[47] This was later raised to $10 million, but the FIS was ultimately axed in in 2012. The GIP is still in effect.[48]

The government also grants expedited citizenship to individuals who are courted to play sports in the Singapore colors. These individuals do not have to demonstrate a strong attachment or commitment to the country apart from the willingness to compete for Singapore on the international sports arena. Their admission is again based on a putative contribution in obtaining sporting medals for the country. Under the Foreign Sports Talent Scheme, foreign born athletes do not have to satisfy the usual residency requirements for citizenship. The government justifies the scheme on the basis that it aims to "raise the standard of play and to augment the local sports talent."[49]

III.   HUMAN-CAPITAL CITIZENSHIP AND THE SINGAPORE 'CLUB'

Singapore's admission policies are governed by an important controlling principle, namely the capacity of the person to be admitted to bring benefits to the country. What is more, 'benefits' is

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[44] "Liberalization of Rules for Permanent Residence."

[45] "Liberalization of Rules for Permanent Residence."

[46] Factsheet: Global Investor Programme, Contact Singapore, available at , https://www.contactsingapore.sg/Library/1/Pages/1191/GIP%20Factsheet%20EN.pdf

[47] "Liberalization of Rules for Permanent Residence."

[48] Justin Harper, Singapore axes residency scheme for wealthy expats, The Telegraph, available at http://www.telegraph.co.uk/finance/personalfinance/expat-money/9199488/Singapore-axes-residency-scheme-for-wealthy-expats.html; Virginia Harrison, *Europe's golden visas lure rich Chinese,* Nov 26, 2013, available at http://money.cnn.com/2013/11/26/news/europe-golden-visas/?iid=EL.   Sophia Yan, *Canada kills investor visa popular with Chinese*, CNN Money, March 25, 2014, available at http://money.cnn.com/2014/02/12/news/canada-chinese-immigration/.

[49] Sing. *Parliamentary Debates*, vol. 90 (6 Feb 2013) (Lawrence Wong).

narrowly defined (implicitly) as contribution to a market economy. The discriminatory logic of this human-capital focus can be seen also in how 'migrant wives' are treated. These are foreign women from developing countries in Asia who marry Singapore citizens, usually from lower socio-economic backgrounds.[50] Due to the husband's lower financial status, these migrant wives are typically stuck in an immigration limbo, with no right of residence in Singapore independent of their husbands' sponsorship and with relatively limited rights to work in Singapore[51] This makes migrant wives perpetually transient outsiders, even though they have acquired permanent links to Singapore as wives and often also as mothers of citizens.[52] Their families experience a high degree of intergenerational socio-economic stress, and the migrant wives are constructed as potential burdens on the state since their roles cannot be easily translated to the market.[53] They are thus not necessarily valued enough to warrant full inclusion within Singaporean society.[54] This bears the logic of human-capital citizenship, in which it is an individual's market value that merits consideration for citizenship.[55] Thus, in some cases, Singapore explicitly mandates the separation of the family in order to prevent migrant wives from becoming a 'burden' on its limited resources, even where Singapore citizen children are involved.[56]

The logic of human-capital citizenship is even starker in the case of migrant workers. Despite obviously contributing to economy of Singapore – forming two-thirds of the labor force, and being key to the construction, shipping, and manufacturing industries as well as domestic work and other services – it is implied in policy and rhetoric that they are the 'wrong' fit for Singapore. [57] As Ellerman puts it, 'whereas highly skilled workers are admitted as bearers of human capital and future citizens, low-skilled workers are recruited on the basis of labor demand – in fact, one might argue, *despite* their personal attributes – and admitted as guest workers only".[58] As Singapore's bifurcated migration regime bears out, human-capital citizenship equates *wages* with productivity or economic contribution. This presumption ignores the fact that processes by which wages are determined do not happen in a meritocratic vacuum but reflect deeply entrenched labor market inqualities. It also ignores the contributions of low-skilled workers without whose labor high-skilled workers could not realize their human capital (as it does the economic importance of unpaid reproductive labor).[59] Indeed, as Bonjour and Chauvin point out in the context of Europe, the paradox of stratified migration on the basis of 'low skilled' (and thus low wage) and 'high skilled'

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[50] Association of Women for Action and Research, 'Migrant Wives in Distress' (1 June 2020).

[51] M Chiu et al, 'Multistressed families in Singapore: A focus on transnational families' (2019) 101 Children and Youth Services Review 372; Association of Women for Action and Research, 'Migrant Wives in Distress' (1 June 2020).

[52] Chong (2014), 333.

[53] Chong (2014), 333 and 341.

[54] Chong (2014), 333 and 341.

[55] Chong (2014), 382.

[56] Chong (2014), 372.

[57] Teo (2019), 170.

[58] Ellerman (2020), 2526.

[59] Ellerman (2020), 2518.

(and thus high wage) workers is that migrants whose highly paid labor will cost the receiving economy a great deal of money are framed as gains, while those whose low wage work will cost the same economy very little are framed as costly.[60]

Singapore's migration regime also reflects the logic of human-capital citizenship insofar as core rights of access to residence and family reunification are stratified according to 'the desirability of immigrants [as corresponding to] their rank in the human-capital hierarchy'. [61] 'Skilled' migrants may sponsor the admission and stay of their dependents. The Global Investor Program, by definition, fast-tracks permanent residency for the families of high-net-worth individuals.[62] In contrast, migrant workers cannot sponsor the admission of their dependents and are banned from forming new family units with Singaporeans and PRs.

IV. STRATIFIED MIGRATION, CITIZENSHIP, AND NATIONAL BELONGING: THE PARADOX OF HUMAN-CAPITAL CITIZENSHIP

The underlying neoliberal logic of a stratified immigration scheme can similarly pervade the idea of citizenship. Beyond a legal status, citizenship is intimately tied to the 'boundaries of belonging' in a nation-state. Immigration and citizenship are intricately linked. As Bajt puts it, 'immigration becomes the first border post or stage in filtering prospective citizens and limiting diversity'.[63] Immigration laws and policies play an integral part in the 'politics of belonging', which is grounded in the idea that 'we are who we are by virtue of who we are not'.[64] How the nation-states prescribe their immigration policies are part of a complex set of interrelated processes of key nationalizing institutions, including the educational system, the construction of national symbols, public memory and rituals.[65] By guarding the right to define citizens and thus exclude foreigners, the nation-state has a monopoly of defining 'membership within the societal community'.[66] Such definitions define who "we" are, who is part of "us" and who is not.[67]

Specifically, *stratified* migration – as opposed to migration in general or *increased* migratory flows – can have very specific impact on national identities and conceptions of citizenship. Ellerman's work on human-capital citizenship – like other literature on the neoliberal transformation of immigration policy[68] – argues that neoliberal ideas *first* changed the concept of citizenship, which *then* affected admission policies. Other literature explores the ways in which immigration laws continue to create, replicate and/or harden hierarchies *among* migrants along lines such as gender,

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[60] Bonjour and Chauvin (2018), 10.
[61] Ellerman (2020b), 2516.
[62] "Liberalization of Rules for Permanent Residence."
[63] Kofman (2005), 458.
[64] Ellerman (2020a), 2464.
[65] Bajt (2016), 55.
[66] [ ]
[67] Bonjour and Block 2016, 779. *See also* Bajt (2016), 54.
[68] Ellerman (2020b).

race/ethnicity, nationality, religion and class [69], and produce 'a multiplicity of relationally configured social and economic dynamics' *among noncitizens*.[70] Little of this literature grapples specifically with how stratified migration *impacts* how citizens conceive of their own citizenship and parameters of belonging to their political community. Chung writes, in the context of South Korea, that tiered visa categories 'may also form the basis for the formation of new social categories of citizen and noncitizen members as well as second-class citizens',[71] but does not explore how. Similarly, Bajt alludes to 'the complex link between… state policies that produce nationalizing exclusionary effects and the multifarious and complex workings behind national identity construction', but does not engage further with this.[72] In this section, we seek to use the case study of Singapore to offer some insights into this specific question.

1. *'Singapore for Singaporeans': the assertion of nativist boundaries of belonging*

It is well-documented that increased migration inflows tend to lead to anxieties that manifest in the reassertion of national or 'nativist' identity, and concomitant backlash against immigrants. Kofman argues that migrants have been increasingly depicted as threats to national harmony and peace, disturbing pre-existing national consensus and culture.[73] In response, the nation-state has reasserted its role as 'protector' against these threats, with attempts to discipline migrant populations with reference to the core values of the nation-state.[74] Even where the core values to which migrants are increasingly required to subscribe are understood as 'universal' within the liberal-democratic tradition, such as human rights and 'tolerance' of others, they have been framed as values *within a national framework*. At the same time, in a manner seemingly antithetical to these 'universal' values, the rise of migration debates and anti-immigrant populism in Europe and North America appears to have deepened racism and the Othering of migrants, particularly in the form of Islamophobia.[75] As Bajt writes, whether or not countries profess liberal-democratic values, migrant naturalization is inevitably presented as joining a distinct national community, and a closer look at 'national' values and norms frequently reveals a particularistic exclusionary basis of either ethnic, cultural or even civilizational differences. [76] These differences have tended to be emphasized in response to increased migration inflows.

These observations are true of Singapore insofar as it has, in the last decade, seen a general trend of backlash against immigration and the rise of nativist sentiments. In 2013, the government

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[69] *See* Ellerman (2020a) and literature cited therein. *See in particular* Chung (2020) (exploring how visa categories – extremely hierarchised in Korea's case – harden racial and gender hierarchies *among* noncitizens, correlating their socially organised differences to access to goods, services and resources).
[70] Meissner (2018), 291.
[71] Chung (2020), 2510.
[72] Bajt (2016), 52.
[73] Kofman (2005), 460-461
[74] Kofman (2005), 463-464.
[75] See [ ] above.
[76] Bajt (2016), 55.

released a "Population White Paper" which promised the annual creation of thirty thousand new PRs and twenty-five thousand new citizens to supplement the existing resident population and compensate for declining birth rates. The White Paper also predicted that by 2030, the population would expand to 6.9 million, of which only a little over half would be Singapore citizens.[77] The unprecedented public outcry in response galvanized a new 'Singapore for Singaporeans' movement, which attributed – and continues to attribute – many of Singapore's problems to the rising number of foreigners. These include wage stagnation, spiraling housing costs, the rising cost of living, the overcrowding of public services (especially public transportation), and even crime rates (which remains consistently low). A protest organized by this movement attracted more than 4,000 participants, a large number among Singapore's usually protest-averse population.[78] In the same vein, the ruling party's performance in the 2011 general election (during which it garnered its lowest vote share, of 60.4 percent, since independence) was widely understood to be largely attributable to 'liberal' immigration policy. In the 2015 general election, the ruling party, having placed new curbs on migrant entry and work visas, recovered much of its lost electoral support. [79]

Public response to the performance of foreign sports talents has become a particular arena showcasing these tensions. For example, when China-born Feng Tianwei won Singapore's first individual Olympic medal in 52 years at the 2012 Beijing Olympics, it was not a unifying moment of pride for the country, as the government might have desired, but one of mixed response. Many Singapore citizens expressed disinterest, if not utter contempt, for the win.[80] For them, there was simply no emotional connection to the victory because Feng was not, in local parlance, a "true-blue Singaporean".[81]

This idea of a 'true-blue Singaporean', or more specifically the idea of the genuine or authentic citizen – the constitutive element of "Singapore for Singaporeans" – remains an amorphous concept. It seeks to draw a bright line distinguishing a genuine citizen from one that is not, but there is no consensus on where this line is drawn. Birth may or may not be a crucial criterion. One commentator posits that "[a] 'true-blue' Singaporean is someone who may not necessarily have been born here, but he or she must definitely have been raised, schooled and lived in Singapore."[82] Despite its vagueness, however, the claims of 'Singapore for Singaporeans' and 'true-blue

[77] National Population and Talent Division (2013).
[78] *Rare mass rally over Singapore immigration plans,* BBC News Asia, February 16, 2013, available at http://www.bbc.com/news/world-asia-21485729. Shamim Adam, Singapore Protest Exposes Voter Worries About Immigration, Bloomberg, Feb 18, 2013, available at http://www.bloomberg.com/news/2013-02-16/singaporeans-protest-plan-to-increase-population-by-immigration.html
[79] Frost (2020), 32.
[80] Jeffrey Oon, *A bronze medal, but at what cost for Singapore?* Yahoo! News, Aug 2, 2012, available at https://sg.news.yahoo.com/a-bronze-medal--but-at-what-cost-for-singapore-.html.
[81] Jeffrey Oon, *A bronze medal, but at what cost for Singapore?* Yahoo! News, Aug 2, 2012, available at https://sg.news.yahoo.com/a-bronze-medal--but-at-what-cost-for-singapore-.html.
[82] Jeffrey Oon, *A bronze medal, but at what cost for Singapore?* Yahoo! News, Aug 2, 2012, available at https://sg.news.yahoo.com/a-bronze-medal--but-at-what-cost-for-singapore-.html.

Singaporeans' would seem to be a renewed attempt to articulate a 'thick' conception of Singapore citizenship. In particular, these claims assert a meaningful difference between formal citizenship and '*true*' membership. Indeed, the Singapore government has had to resist calls from some quarters to distinguish between 'new citizens' and 'native born citizens'.[83] This echoes Anderson's observation, for example, that British citizenship is now increasingly stratified according to those who have attained it by birth, and those who have attained it by naturalization - the implication being that 'citizenship' is a legal formality that does not necessarily connote 'Britishness', the real criterion of belonging.[84]

Notably, whereas the reassertion of the nation-state is associated with the 'death of multiculturalism' in Europe, in Singapore's particular context, it appears to have *strengthened* the articulation of multiculturalism as a core national value to which migrants must subscribe in order to truly belong. Several authors have demonstrated how, in discourse about new immigrants, Singaporeans define their 'national culture' as multicultural, distinguishing Singaporean identity from that of co-ethnic migrants.[85] In this way, multiculturalism has become the normative basis in arguing against the entry of new migrants and questioning whether these groups 'belong' in Singaporean society.[86] In a stark repudiation of policy assumptions that 'racial' similarities will allow migrants to easily integrate into Singapore society,[87] these arguments have been most strongly directed against co-ethnic Chinese and Indian migrants. As Yeoh and Lin as well as Ang, have demonstrated, immigrants from the People's Republic of China (PRC) have been the biggest targets of anti-immigrant sentiments.[88] A key objection is that they, unlike Singaporean Chinese, do not understand or practice the acceptance of racial diversity that is so central to Singapore.[89] This has been echoed in the response of Singapore Indians to Indian migrants across the economic spectrum, with Singaporean Indians deploying the concept of multiculturalism to insist on the distinction between themselves and "India Indians".[90]

A *growing* migrant population thus appears to have led to renewed attempts to articulate a 'thick' conception of Singaporean identity and citizenship, in particular through multiculturalism as an existential national value which – paradoxically – is sometimes weaponized to justify and perpetuate anti-immigrant sentiment. *Stratified* migration, however, complicates this picture. Namely, it has led to two specific phenomena: the reinforcement of citizenship as a club good, and a construction of 'true' citizens along 'Othering' criteria established by immigration laws.

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[83] Thompson 2014, 325
[84] Anderson 2013, 110.
[85] Ortiga 2014, 954-5.
[86] Ibid.
[87] See e.g. Frost (2020).
[88] Yeoh and Lin 2013; Ang 2021.
[89] Ang 2021.
[90] Woods and Kong 2022.

2. *Citizenship as capital / exclusive club good*

How a state allocates citizenship shapes the background conditions defining what kind and degree of connection is expected between the individual and the political community.[91] Michael Walzer used neighborhoods, clubs, and families as three possible analogues for the political community in explicating the differing admission policies that different states could adopt.[92] According to Walzer, states behave like families when they prioritize admission to relatives of citizens, whether these are actual relations or outsiders that are recognized as national or ethnic "relatives".[93] It operates along the kinship principle in preferring relatives of those who have been admitted, co-ethnic immigrants, and in automatically conferring citizenship by descent. Walzer argues that such policy is especially appropriate in a political community largely formed by the admission of immigrants. In comparison, states behave like clubs when it orientates their admission policies towards those who are considered appropriate to the kind of community that the existing members want to create and who are able to contribute to the common good of the polity. These are matters for political decision, and may be judged morally, politically, and factually, but are matters that fall within the final and authoritative choices of the existing members.[94] The main difference between the club and family analogues is that when the state behaves as a club, it operates along the principle of benefits over costs. This *benefits principle* contrasts with the *kinship principle* in the family analogue in that the latter prioritizes family relations (on an individual level as well as on the national level).

While the Singapore government has tried to construct a thick meaning of citizenship, its treatment of non-citizens as well as citizens takes on a far more instrumental approach. Acting like a club, Singapore admits, allocates and stratifies membership based on the benefits principle. Membership is thus symbolically and substantively constructed as an economic good. It is hardly surprising, therefore, that faced with anxiety over growing migration, the government's approach has been to double down on assuring Singaporeans of the exclusivity of their club good. From the mid-2000s onwards, in what has been characterized as 'an aggressive campaign of differentiation', the government has implemented various measures to 'differentiate' between citizens and noncitizens in terms of benefits, subsidies and access to public services.[95] As pathways towards citizenship have become narrower in the last ten years, more people live in Singapore than ever as

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[91] Ibid.

[92] It should be noted that Walzer uses these analogues primarily to defend the right to exclude, which he considers to be the right of communities to self-determination. We are borrowing the analogues to consider what implications each analogue – in particular that of the club – has for the nature and content of membership in a political community, i.e. citizenship. Note that Bader criticizes for Walzer's analogues because they suggest that states are "warm horizontal Vergemeinschaftungen or free and democratic associations, based on consent". Instead, Bader argues that states are "cold vertical institutions, based not on free entry but on enforced membership and physical violence." Thus, he argues that they are strictly speaking not "associations" at all but institutions. Bader (1995).

[93] Walzer (1984), [].

[94] Walzer (1984), [].

[95] Thompson 2014, 321-325.

'nonresidents'.[96] The differentiation campaign not only sharpens the symbolic boundary between citizens and noncitizens,[97] it also draws ever-wider gaps between the right and privileges of the 60-65% of the population who are citizens and those of the 35-40% who are not.[98] By emphasizing the perks of citizenship, these policies reinforce the sense of citizenship as a valuable possession or exclusive club good, the distinguishing feature of which is access to public goods or other resources from which others are excluded.

Furthermore, when citizenship is commodified, backlash against new citizens takes a specific form – the questioning of their loyalties on the assumption that they instrumentalize their citizenship. After all, if admission policies are constructed on the basis of human-capital citizenship, it seems only natural that migrants will apply for and deploy their citizenship as capital. Bauder illustrates how certain wealthy immigrant communities use Canadian benefits-for-visas programs, particular the Business Immigration Program, to obtain immigrant status and subsequently citizenship in exchange for investments, which 'can be converted into other forms of capital', including monetary capital through expanded possibilities for international business transactions, social capital through establishing multinational professional and personal contacts and cultural capital through the acquisition of language capacity, education and professional credentials.[99] These policies appears to have created backlash in Canada against what is perceived as the 'strategic use' of such citizenship.[100]

This certainly has resonance in Singapore. In the words of one Singaporean in a public newspaper forum, 'Yes, we are a migrant society; thus we should be readily receptive to new immigrants. However, migrants today can go wherever there are opportunities. Whether they are totally committed to Singapore or flee at the slightest sign of trouble remains to be seen.'[101] As Ortiga explains, it is not necessarily their home country that Singaporeans envision expatriates fleeing to. In the case of Chinese and Indian professionals, for example, Singaporeans see the Singaporean passport as according them more mobility than their original passports would have, providing them better access to 'desired' immigration destinations such as Canada, the United States and Europe[102] - in other words, using citizenship as transnational capital in the way Bauder describes.

While such sentiments are most frequently directed at wealthier migrants,[103] it bears noting that low-wage migrants are not spared, notably because the immigration regime deliberately constructs them as 'transient'. As Ang as well as Yeoh and Lin show, the 'myth of transience' – intersecting

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[96] Ibid.
[97] Ibid.
[98] Ibid.
[99] Bauder 2008, 321.
[100] Bauder 2008, 321.
[101] Ortiga 2014, 958.
[102] Ortiga 2014, 958.
[103] Ortiga 2014, 958.

with racial stereotypes – feeds into how PRC migrants are imagined as 'profoundly self-interested' and desire to benefit from but not contribute to Singapore. [104]

3. *Who is a Singaporean? Mapping race and class stratification onto national identity*

The neoliberal logic of the stratified immigration scheme, focusing as it does on one's human capital as a determinator of worth and for inclusion, creates within the system certain paradoxes. In particular, it injects class as the central category, whether consciously or subconsciously, within the idea of citizenship. Anderson argues that, rather than simple competitors for the privileges of membership, *citizens and migrants define each other*, and that they do so through sets of relations that shift and are not in straightforward binary opposition.[105] Judgements about who is needed for the economy, who counts as skilled, what is and is not work, what is a good marriage, who is suitable for citizenship, and what sort of state-backed enforcement is acceptable against 'illegals', affect citizens as well as migrants.[106]

Ellerman further argues that human-capital citizenship blurs the distinction between the cultural and the economic. Rather, the discursive justifications of human-capital based immigrant admissions reflect the fact that economic attributes and perceived cultural characteristics are *mutually constitutive of each other*. Human-capital rich immigrants thus not only are valued for their economic contributions, but also are part of a larger project to create a national identity defined by class attributes.[107] Given that human capital is largely understood as a function of class-based attributes such as higher education and work experience in the knowledge economy, class becomes the key axis of social differentiation.[108]

In our view, Singapore's stratified migration regime constructs Singaporean citizenship and identity in a manner that connects Ellerman's and Anderson's arguments. In its judgments about who is needed for the economy, what counts as skilled labor, what counts as 'benefiting' Singapore and whose inclusion would maintain the 'racial balance' of Singaporean society, Singapore's immigration regime is one where economic (and racial) attributes are seen as markers of *suitability for admission* into the Singaporean political community.

In relation to class, stratification in immigration policy maps onto stratification in public rhetoric. On the one hand, low wage migrant workers are seen as being depressing the wages of Singaporeans, leading to social 'disamenities' when they take up public spaces, and presenting social dangers such as crime.[109] In an example of how class and culture are mutually constitutive,

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[104] Yeoh and Lin 2013, 32–44
[105] Anderson (2013), 2.
[106] Anderson (2013), 2.
[107] Ellerman (2020b), 2518
[108] Ellerman (2020b), 2518
[109] Goh (2014).

backlash against low-wage migrants has tended to center on their 'cultural inferiority due to economic underdevelopment' despite 'racial similarities' shared with local Singaporeans.[110] In June 2022, a Singaporean man was convicted for launching a public tirade against two South Asian migrant workers, shouting at them to leave Singapore. In his defense in court, the man asserted that it was his "constitutional right" to insult them because of the "crime situation" and "overcrowding in Singapore caused by foreign nationals".[111] While he gained notoriety for the absurdity of his particular actions, public commentary acknowledged that the sentiments he had expressed were not uncommon among Singaporeans.

On the other hand, the discourse of race and class difference also defines local hostility towards wealthy – and generally 'white' – expatriates. Singaporeans accuse the government of encouraging the presence of 'arrogant' overpaid 'white' expatriates despite the fact that many Singaporeans are now qualified of doing the same work.[112] Wealthy foreigners are the subjects of resentment for their posh cars, luxury houses, wining and dining in upscale restaurants, and partying in exclusive clubs, all of which are out of the reach of the ordinary citizen. The feeling of being 'second class' of one's supposed country of citizenship is exacerbated by governmental insistence that the presence of wealthy foreigners with fast-tracked residence status or even citizenship are somehow beneficial to the country.

The Othering of foreigners at both ends of the class spectrum reflects a core struggle within the framework of a Singapore which defines itself as 'cosmopolitan'. Yeoh has argued that in city-states such as Singapore, which harbor both nation-building and globalizing ambitions at the same time, transnational flows of a range of subjects present a paradox: namely, that nation-building requires not just inclusionist but also exclusionist projects that construct the borders of the nation by attempting to domesticate certain transnational subjects ('foreign talent') while distinguishing other foreign bodies (low-wage migrants and other nonresidents) as transgressors of the nation. [113] This is echoed in Goh's research, which demonstrates how migrant workers embody the contradictions of super-diversity in Singapore, in which the cosmopolitanism of the global city is secured through the attempted exclusion of migrant workers. [114] Within this framework, the Singaporean is *not* the migrant worker / nonresident, who is constructed through immigration law as excluded from part of what Yeoh calls the "geobody of the nation".[115] But, while high wage or wealthy foreigners *are* part of the "geobody of the nation" (or at least allowed to aspire thereto), they are viewed as different from Singaporeans insofar as they are highly mobile subjects of

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[110] Ortiga (2014), 953.
[111] Straits Times, The (2022), 'Man who said it was his 'constitutional right' to insult 2 foreign workers convicted' 14 June 2022, online <https://www.straitstimes.com/singapore/courts-crime/man-convicted-of-offences-including-hurling-xenophobic-insults-at-2-foreign-workers>
[112] Ortiga (2014), 953.
[113] Yeoh (2006), 32 and 36.
[114] Goh (2019), 357.
[115] Yeoh (2006), 32 and 36.

cosmopolitanism. As Hage argues, xenophobia emerges in some cases from 'mobility envy', i.e. a sense of feeling 'stuck' while witnessing the migrant's mobility in terms of social class or other ways. [116]

Further, Singapore's migration regime appears to have engendered a close association in the public imagination between ethnicity or national origin, on the one hand, and class and immigration status, on the other hand, in ways that are highly specific. Racialized logics govern the admission of low wage migrant workers, in the form of approved 'source countries' for different industries. For example, workers from Bangladesh, India, Indonesia, Myanmar, Pakistan, the Philippines and Thailand cannot be hired in the service and manufacturing sectors, but may be hired in the construction and marine industries (along with those from other source countries such as the People's Republic of China (PRC)). [117] Criteria for foreign domestic workers are as gendered as they are racialized, with only females from selected source countries such as Indonesia, the Philippines and Myanmar eligible for hire.[118] Women from the PRC cannot work as domestic workers although they can work in the service sectors – possibly signifying the state's fear of the co-ethnic Other in the private home. [119] These appear to have directly shaped public perception as to the cultural attributes of respective migrant groups and the specific ways in which they do not belong to Singapore. An ethnographic study shown that Singaporean women see women from the PRC as disrespectable, guilty of excessive materialism and of "transgressing" the Singaporean-Chinese family.[120] Other ethnographic work has suggested that Filipina migrant women in 'higher status' industries tend to take pains to distance themselves from Filipina domestic workers, in large part due to awareness that Singapore society tends to assume that a Filipina woman in their midst is a domestic worker.[121]

Thus, the public imagination of who is or can be Singaporean has been limited by immigration policy prescribing ethnic limits on this status, *even as multiculturalism has been increasingly asserted as an existential national value*. It bears interrogating whether the development of a multicultural Singaporean identity should be constrained by the 'racial balance' in place at the point of decolonization, particularly when this 'racial balance' it itself based on subjective ethnic categories that were defined by the colonial government.[122] A commentator, writing in a popular newspaper in 2015, argued that "[Singapore] should also have more migrants from the region… South-east Asia is still our hinterland. This means we should be more welcoming towards Thais, Vietnamese, Filipinos and Indonesians, among others."[123] His argument invoked the dissonance

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[116] Hage (2009).
[117] Teo (2019), 169. Ang (2021), 239-240.
[118] Ibid.
[119] Ibid.
[120] Ang (2016).
[121] Yeoh and Soco (2014), 180.
[122] *See e.g.* Goh and Holden, 1-16; Poon (2009); Hirschmann (1986) and Hirschmann (1987).
[123] Teo (2019), 3930.

between Singapore's geographical placement in Southeast Asia, on the one hand, and the assumption that, insofar as persons from various Southeast Asian states do not fall within the 'C', 'M' and 'I' categories, they would endanger the 'racial balance' and thus multicultural Singaporean society.

V.   CONCLUSION

This paper has attempted to show that there necessarily is tension between, on the one hand, managing migration according to the logical of human-capital citizenship and, on the other hand, attempting to construct a coherent account of national belonging and identity. Whether in Singapore's postcolonial multicultural context or in the context of countries where the 'paradox of universalism' has allegedly led to the 'death of multiculturalism', the stratification of migration has tended to serve a populist rhetoric around the primacy of 'true' or 'native born' or 'legitimate' citizens. This rhetoric has garnered opposition towards migrants or new citizens who are imagined to be deploying their statuses strategically, rather than having any genuine affective connection with the country. In Singapore, while this rhetoric appears in some ways to have boosted the government's efforts to construct a thick conception of Singapore citizenship, stratified migration continues to complicate and undermine this phenomenon, insofar as it (i) reinforces citizenship as an exclusive club good that must increasingly be gatekept and (ii) constructs 'Singaporeanness' – necessarily in opposition to the migrant 'Other' – in ways that are highly defined by the class and racial criteria which undergird Singapore's immigration laws.

These tensions place the immigration policies of Singapore's government in a bind as they seek to straddle the thin line between economic openness (and 'cosmopolitanism') and popular support. This predicament can be seen in the arguable incoherence of the government's rhetoric on maintaining a 'Singaporean core'. Having progressively introduced measures since 2011 expressly to limit the employment of foreigners and thus 'ensure a Singaporean core workforce',[124] the government emphasized in 2021 that:

> '[t]he "Singapore core" should not be too narrowly defined in terms of whether someone is Singapore-born, a new citizen, or a foreigner who is helming a company... [Rather] that test for us must be the commitment to Singapore, the commitment to the well-being of Singapore and of Singaporeans'.[125]

Ultimately, these tensions may not be resolved by any strict binary between "citizen"/Singaporean and noncitizen/non-Singaporean. Although the normative valence of citizenship is never in

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[124] Parliamentary Debates: Official Report, vol 94 (17 October 2021) (Dr Amy Khor Lean Suan).
[125] Yuen Sin. 2021. "Emerging Stronger Taskforce: Avoid narrow definition of 'Singapore core', says DPM Heng." Straits Times, 17 May, 2021. https://www.straitstimes.com/singapore/emerging-stronger-taskforce-avoid-narrow-definition-of-singapore-core-says-dpm-heng.

question,[126] it has come under increasing challenge as the *primary* or most important relationship between a person and a state. Kochenov, for example, argues that there is a gulf between the egalitarian ideology of citizenship and the global spatial inequality that it furthers in practice based on 'birthright lottery' rather than any acceptable substantive justification.[127] This echoes the work of Bosniak as well as Cohen, who, while not criticizing citizenship as an 'aberration of justice' as Kochenov does, argue that attention should shift from formal citizenship to the 'citizenship of non-citizens' or 'semi-citizenship' that refers to the partial inclusion of some non-citizens through a bundle of rights and privileges.[128] Teo proposes one such framework in Singapore's context, namely 'multicultural denizenship' (in contradistinction to multicultural *citizenship*). According to Teo, the concept of 'denizenship' envisions how civil, economic and social rights that are usually associated with citizenship may be 'unbundled' and reorganized, seeing citizenship as a continuum rather than as a binary status.[129] Elsewhere, Cheah argues that developments in international law have attempted to create a 'differentiated citizenship' for migrant workers in the ASEAN region, one which advocates for their inclusion in the social, political and cultural fabric of the host community.[130] Indeed, Singapore would appear to be promising ground on which to explore these understandings, given the particularly high rates of foreigners deeply enmeshed – as we have seen – in the labor force and in Singaporean families. Whatever form these may take, it will be important to ensure that these differentiated bundles of rights do not end up simply replicating the stratification in the status quo. As Ellerman argues, "[b]y itself, human-capital focused integration will not foster the kind of rootedness, identity, and community that is integral to citizenship. Ultimately, citizenship is most likely to thrive where we have a sense of being connected to those around us, where the recognition of interdependence can foster an ethic of care, and where the economic contributions of all workers – whether high- or low-skilled, whether paid or unpaid – are recognized as integral to social and economic well-being.[131]

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[126] Bosniak (2005).
[127] Kochenov (2019), [ ].
[128] Bosniak (2006); Cohen (2009).
[129] Teo (2019), 74-76.
[130] Cheah (2009).
[131] Ellerman (2020b), 2528

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