Ryoo, H., Ryoo, D., & Ahn, Y. (2026). Refugee Protection in South Korea and Japan: Interpreting International Duties Through Domestic Law. *Critical Debates in Humanities, Science and Global Justice*, *6*(2), 125–138.

RESEARCH ARTICLES

Refugee Protection in South Korea and Japan: Interpreting International Duties Through Domestic Law

Hwarim Ryoo, High School Diploma[1a], Dayeong Ryoo[1], Yejin Ahn[1]

[1] St. Johnsbury Academy Jeju

Keywords: refugee protection, comparative legal analysis, South Korea, Japan

Critical Debates in Humanities, Science and Global Justice

Vol. 6, Issue 2, 2026

Despite their accession to the 1951 Refugee Convention and the 1967 Protocol, South Korea and Japan remain among the most restrictive refugee-hosting states in East Asia. This study conducts a qualitative comparative analysis of how both countries interpret and incorporate international refugee obligations through domestic legislation and administrative practice. Using a social constructivist perspective, the paper examines how shared international norms are reinterpreted through domestic political identities, institutional cultures, and societal narratives. The analysis focuses on three core dimensions of refugee protection: non-refoulement guarantees, differentiated legal status and rights categories, and refugee recognition procedures. The findings show that divergence arises not from formal legal commitment but from the mechanisms through which restriction is produced. South Korea codifies comparatively expansive protections in statutory text, including extended non-refoulement coverage and enumerated social rights for recognized refugees, yet significantly narrows these protections in practice through restrictive implementation and procedural gatekeeping. Japan, by contrast, maintains near-verbatim compliance with the Refugee Convention in its legal framework but constrains protection through stringent evidentiary standards, centralized ministerial control, and legislative amendments limiting repeat applications. Taken together, the study demonstrates that international refugee law does not function as a fixed or self-executing standard but is reinterpreted through domestic legal frameworks and socially constructed understandings of legitimacy, security, and national identity. By opening the "black box" of domestic legal interpretation, this research contributes to comparative refugee law scholarship and advances the understanding of how international norms are selectively internalized within East Asian refugee protection regimes.

Introduction

Despite signing and acceding to international conventions and adhering to international norms, states interpret and apply them in markedly different ways. This creates sharp divergences between nations that are sometimes geographically close to one another. This is best evident in East Asia where

a Hwarim Ryoo, Dayeong Ryoo & Yejin Ahn are students at St. Johnsbury Academy Jeju

advanced economies like South Korea and Japan who appear to espouse liberal democratic values systems remain among the most restrictive refugee hosting countries.

According to the United Nations High Commissioner for Refugees (UNHCR), South Korea recognized 3,940 persons as refugees or humanitarian status holders, despite 96,561 total applications, with a total of 22,547 first instance applications and administrative appeals underway (2023). Meanwhile, Japan Association for Refugees records that there were 822 people recognized as refugees and 5,902 recognized as humanitarian state holders, despite 103,308 applications from 2001 to 2023 in total (2024). This is despite their formal accession to the 1951 Refugee Convention and its 1967 Protocol. This invites closer examination of why, despite shared international obligations, the legislative frameworks and institutional practices of these states diverge from those of comparatively similar countries elsewhere.

This study, by adopting a qualitative comparative case study, intends to examine how South Korea and Japan adheres to international standards by surveying their domestic legislation pertaining to refugees. In doing so through a constructivist lens, it finds that although both nations share a common legal baseline, they diverge in how they interpret and internalize their international obligations. South Korea codifies broader protection in statute, extending non-refoulement guarantees and defining detailed rights categories, yet narrows these protections in practice through restrictive implementation and limited social entitlements. Japan, conversely, sustains near-verbatim compliance in text but restricts recognition through procedural mechanisms, high evidentiary thresholds, and recent legal amendments that limit repeated applications.

This paper broadens our understanding of how international law is mediated through domestic frameworks and opens the "black box" in terms of the measures both nations adopt to stymie the process of refugee acceptance. It shows that South Korea, while adopting domestic legislation broadly aligned with international conventions, narrows protections in practice. Japan on the other hand, sustains formal compliance in letter but limits recognition through procedure. By delving deeply into the adoption of international conventions and norms the study helps advance comparative scholarship on refugee protection and international law adherence in East Asia and helps us make sense of how South Korea's legislative framework for refugee protection reflects its interpretation of international conventions compared to that of Japan.

The next section discusses the methodology and theory employed for this research. This is followed by a literature review which comprehensively examines the primary and secondary literature relevant for this article. The paper then proceeds to the analysis, which compares South Korea and Japan across three key dimensions, which includes non-refoulement protections, differentiated rights categories, and recognition procedures; before

concluding with a discussion of future research directions necessary to broaden our knowledge on refugee protection regimes and procedures in East Asia.

Method and Theory

This study employs a qualitative, comparative case study approach to analyze how South Korea and Japan have interpreted and implemented their obligations under the 1951 Refugee Convention and the 1967 Protocol. The two countries are selected as most-similar cases: both are advanced industrial democracies in East Asia, both acceded to the Protocol within a decade of each other, and both operate within broadly restrictive refugee protection regimes. Even so, their legislative frameworks and institutional practices diverge in ways that invite comparative analysis.

The data for this study are drawn primarily from legal texts, government reports, and secondary academic literature. The analysis focuses on the domestic legal codification of international norms and the administrative practices through which such refugee protection measures are operationalized. Rather than evaluating compliance with international law in a purely doctrinal sense, this design directly addresses the research question of how South Korea's legislative framework for refugee protection reflects its interpretation of international conventions compared to Japan.

In that sense, it explores legal codification: how conventions related to refugee protection are adopted through domestic law and how both nations interpret these measures. Their differences in legal and procedural frameworks, in turn, reflect each country's normative interpretation of international obligations.

This paper adopts a social constructivist perspective to interpret how South Korea and Japan engage with international refugee law. Constructivism holds that international norms and laws do not possess fixed meanings; rather, their significance and practical application are mediated by domestic identities, norms, and social understandings of appropriateness (Wendt, 1992; Finnemore & Sikkink, 1998).

Applied to this study, the 1951 Refugee Convention provides a shared normative baseline, but its meaning in practice is shaped by how states socially construct "refugee protection" within their domestic contexts. Thus, divergence in interpretation is not explained solely by material capacity or legal obligation but by how governments internalize—or resist—international norms in ways consistent with their political culture and identity narratives. Through this lens, both countries illustrate the constructivist claim that international law does not determine outcomes automatically. Instead, states reinterpret norms through their own identity frameworks and political pressures, producing practices unique to their context.

Literature Review

This literature review examines how South Korea and Japan have implemented the 1951 Refugee Convention and 1967 Protocol, highlighting both commonalities and divergences in their legislative and institutional frameworks. In South Korea, the Korean Refugee Act brought domestic law closer to international standards, yet persistent gaps, such as restrictive work rights, limited social support, and procedural delays, continue to hinder effective protection (Wolman, 2013; Choi, 2021). Japan's Immigration Control and Refugee Recognition Act (ICRRA), alongside selective initiatives like the 2010 Pilot Refugee Resettlement Program, reflects a consistently restrictive approach, with low recognition rates and limited integration measures despite periodic reforms, including the contested 2023 amendments (Takizawa, 2015; Takahara, 2023; Immigration Services Agency of Japan, 2024). While existing literature offers valuable country-specific insights, there is little comparative analysis of how both South Korea and Japan, despite similar accession timelines, interpret and operationalize their treaty obligations. This study addresses that gap by directly comparing their legislative frameworks, with particular attention to how each country's laws reflect its interpretation of international refugee conventions.

Understanding how these shared international obligations are defined is necessary before examining how each state selectively translates them into domestic law. The 1951 Refugee Convention was the first initiative in regards to refugee norms which emerged as a response to the displacement of communities across the world following the devastation of World War II. The Convention defined the term refugee as "someone who, due to a well-founded fear of persecution, is outside the country of nationality and is unwilling or unable to return to it, or is outside the country where they last habitually resided if they have no nationality" (1951 Refugee Convention). It established minimum standards for treatment, including non-discrimination and access to basic rights.

The 1967 Protocol Relating to the Status of Refugees is an extension of the 1951 Refugee Convention, expanding its scope to encompass a larger population and, crucially, removing the temporal and geographical limitations originally imposed. This broadened applicability, encouraged wider international participation, greatly increasing the number of signatories from 22 in 1960 to nearly 150 today. Under Article VII of the protocol, states acceding to the protocol may make reservations to certain articles of the 1951 Convention, except for the core principles such as articles 1, 3, 4, 16(1), and 33. The protocol's flexibility of partial adherence made it easier for states to accept and implement refugee protection measures. The 1967 Protocol reinforced international refugee law as nations ratified the protocol was bound to obligations stipulated in the 1951 Convention, even when they were not parties to the convention themselves, and further committed to cooperating with the UNHCR in supervising its implementation. Although

these instruments establish binding minimum standards, the literature has paid far less attention to how East Asian states selectively operationalize these obligations through domestic legislation.

Japan acceded to the Protocol in 1981, while South Korea acceded to the Protocol in 1992. Although Japan acceded to the Protocol in the early 1980s, they implemented domestic legislation aligning to the Protocol in 2010, a full 30 years later. Japan revised their immigration legislation in 2023 in order to make it easier to deport asylum seekers who have had multiple unsuccessful applications. Previously, applicants could remain during the review process. Critics argue this risks violating international protections, while the government aims to prevent abuse of the system (Kasai, 2023). Contrastingly, South Korea adopted domestic legislation giving effect to the Convention and Protocol in 2013, several decades subsequent to their accession. The long delay between accession and domestic implementation in both countries raises the central question of this paper: how treaty commitments are filtered through domestic political and institutional logics.

Between 1994 and 2024, there was a significant increase in the number of refugee applications in South Korea, reaching over 120,000 (Jung, 2025). The influx was largely driven by asylum seekers from Yemen, China, and several African nations. However, despite the rising number of applications, the acceptance rate remained extremely low, averaging around 2% annually, eventually reaching 2.7% in 2025 (Moon, 2025). The country's low acceptance rate, restrictive policies on employment and social services, and reliance on detention have led to international bodies and human rights organizations criticizing South Korea's implementation of refugee protection mechanisms (UNHCR, 2022). Scholars note that while the 2013 Korean Refugee Act was a landmark in creating a stand-alone refugee law, it still leaves wide room for government control (Soh & Lund, 2014). The law allows officials broad discretion over detention, keeps work permits tightly restricted, and offers only limited social support, meaning that protection often depends more on administrative practice than on enforceable rights (Wolman, 2013; Lee, 2019). Empirical studies further show that South Korea's low recognition rate is driven less by the law's text than by how cases are processed: officials rely on quick screening systems, demand levels of proof that many asylum seekers cannot realistically provide, and courts generally uphold government denials, all of which depress approval rates despite the statue's liberal appearance (Choi, 2021). A security-first policy frame further narrows protection space by treating asylum seekers primarily as a public-order problem rather than a human-security obligation, shaping agenda-setting and resource allocation across ministries (Lee, 2019). The 2018 Jeju Yemeni episode made these dynamics visible: authorities prioritized containment and temporary "humanitarian stay" over recognition, while politicized narratives amplified public fears and legitimated restrictive responses (Choi & Park, 2020). Public discourse framed Yemeni arrivals to South Korea as a security and welfare threat rather than a humanitarian issue,

revealing how social anxiety and media framing shaped national attitudes towards asylum seekers. Rather than repairing these gaps, recent reform proposals and court-centered developments tend to emphasize screening efficiency, curtail litigation, and expand denial or revocation grounds—moves that risk hardening gatekeeping without improving due process (Lee, 2024). Taken together, this literature indicates that what is missing is not formal adherence to international instruments but the operational guarantees that make rights real: timely and reasoned Refugee Status Determination (RSD), meaningful access to counsel and interpreters, early work authorization and baseline social supports to reduce precarity, and strict limits on detention consistent with necessity and proportionality (Wolman, 2013; Choi, 2021). Consequently, the Korean Refugee Act leaves many protocols "visible" on paper, yet institutional design and security framing obscure or erode them in practice (Lee, 2019; Lee, 2024). These dynamics manifest in prolonged delays, restricted access to work and services, and continued reliance on detention, despite statutory safeguards (Yu, 2025).

While existing studies provide important insights into South Korea's refugee regime, several gaps remain. Much of the literature relies predominantly on doctrinal and legal interpretation, focusing on statutory provisions rather than examining how refugee protection operates within administrative institutions (Wolman, 2013; Byrne & Gammeltoft-Hansen, 2020). There is limited empirical research on the internal decision-making structures and organizational practices of refugee status determination bodies, despite their central role in shaping consistently low recognition outcomes (Choi, 2021; Lee, 2024). As a result, the literature insufficiently explains how institutional design mediates the implementation of formally adopted international refugee norms.

In contrast, Japan's refugee framework developed within an immigration-control structure that has prioritized administrative restriction over expansive protection from the outset. The ICRRA was the first legislation implemented in Japan, determining refugee status (Cabinet Order No. 319 of 1951). It established the core procedures for refugee recognition in Japan, including application at regional immigration bureaus, interviews with officials, submission of supporting evidence, and avenues for appeal following rejection (UNHCR, 1994). Following Japan's accession to the 1951 United Nations Convention Relating to the Status of Refugees and the 1967 Protocol, domestic law was significantly revised to incorporate provisions for refugee recognition in Japanese immigration law (Immigration Bureau, Ministry of Justice, Japan, 2016).

Japan began accepting refugees in 1978, primarily from Indochina, resettling 11,319 individuals between 1978 and 2005 (Library of Congress, 2016). Despite accession to international refugee instruments, successive governments have maintained a comparatively restrictive interpretation (Japan Association for Refugees, 2017), with refugee status decisions tightly controlled by the Immigration Services Agency under the Ministry of Justice.

One of the most transformative shifts in the policy of refugee protection in Japan was the commencement of the Pilot Refugee Resettlement Program in 2010. The program represented a crucial policy shift that gave a formalized channel for refugee admission as an alternative to individual claims for asylum. The initial proposal gave it the status of a three-year pilot scheme, targeting Karen refugees housed in the Mae Lae camp in Thailand on the basis of well-defined selection criteria favoring similarly constituted family units who have potential for integration into Japanese society (Takizawa, 2015). The annual ceiling of thirty refugees quickly exposed structural limits, as few candidates were selected and integration concerns discouraged participation (Phillimore et al., 2021). This revealed the narrow scope of Japan's humanitarian admissions.

A major legislative shift occurred in 2023 with the first substantial revision of the ICRRA in over thirty years. The amendment introduced a supervised release system to address prolonged detention and authorized the deportation of individuals whose asylum applications had been rejected multiple times (Takahara, 2023; Immigration Service Agency of Japan, 2023). While framed as detention reform, these changes have raised concerns about reduced procedural safeguards for repeat applicants.

In 2023, Japan reviewed 8,184 refugee applications and recognized 289, an approval rate of roughly 3.5%, a historical high that still remains low among advanced economies (Immigration Services Agency, 2024). Comparison with similarly sized economies confirms the point, as Germany and Italy processed and granted protection to tens of thousands of asylum seekers in 2023, while non-signatory Malaysia hosted over 200,000 refugees (UNHCR, 2025).

Some scholars have argued that the primary issue is in how refugee status is determined (Zhu, 2024) while others contend that the way in which the process is organized "discourages the pursuit of refugee protection" and raise concerns with "lack of independence, expertise and transparency in the determination process and asylum procedure" (Plantilla, 2023). Some domestic civil society organizations, including the Japan Federation of Bar Associations and the United Nations, pose opposition to the legislative changes from 2023, arguing that these changes could limit refugee protections and not enhance protections already enshrined in domestic legislation (Kobayashi, 2023). Even for recognized refugees, integration remains limited due to scarce employment opportunities, language barriers, and minimal welfare support, particularly in housing, healthcare, and education (Omata, 2015; Bell, 2022; Obi, 2012). Thus, challenges pertaining to the process of obtaining refugee status, together with post-recognition complications in integration, point to the inconsistency between Japan's statutory obligations for refugee protection and effective delivery. Although existing studies highlight Japan's restrictive procedures and bureaucratic control, they rarely compare these dynamics with states that appear more generous in law but generate comparable exclusionary results in practice.

As evident through this literature review, South Korea and Japan present highly restrictive refugee administrations, although they signed the 1951 Refugee Convention and 1967 Protocol. Current literature documents parallel restrictiveness but does not explain how identical treaty commitments are domesticated differently. In South Korea, procedural delays, discretionary detention, limited socioeconomic rights, and a security-oriented framing have undermined the domestic application of the law. Similarly, in Japan, the ICRRA is known for its rigidity. This is evident in the limited resettlement initiatives and the additional restrictions introduced in the 2023 amendments, which have drawn criticism from both domestic and international actors for undermining refugee protection. Despite these similarities, little research has been done to examine how each country interprets and implements these treaty obligations and applies them given different political and socio-economic contexts. By comparing these two cases, this paper highlights how variations in legislative frameworks have shaped parallel yet distinct refugee acceptance and integration practices.

Analysis

Although South Korea and Japan both ground their refugee regimes in the 1951 Convention definition, they diverge sharply in how protection is structured and restricted. Korea expands protection categories in statute but limits their practical effect, whereas Japan maintains near-verbatim treaty language while constraining access through administrative and procedural barriers. This section compares the two systems across three dimensions: scope of non-refoulement, allocation of rights, and recognition procedures.

Korea mirrors the Convention's refugee definition in statute and then builds out explicit procedural categories, such as "refugee status applicants" and "humanitarian status holders," while they extend the non-refoulement protection to all three groups in the text of the law, stated in Articles 2 and 3. At the same time, Korea codifies detailed rights for recognized refugees (Articles 30–34), including social security at the same level as nationals (Article 31), even as some benefits diverge in practice for non-recognized groups. Meanwhile, Japan's ICRRA incorporates the Convention definition and regulates refugee recognition within its broader immigration framework. Korea's divergence from international baselines is primarily textual and category-based, since it has wider non-refoulement and enumerated social rights for recognized refugees, whereas Japan's is primarily administrative layered onto Convention-conforming text, de strict screening and recent limits on repeated claims.

Certain procedures within the two are also comparable. Unlike the convention, the Korean Refugee Act extends its protection not only to accepted refugees but also to refugee applicants, representing a broader scope of protection than the international baseline. Japan, contrastingly, applies it narrowly to recognized refugees only, though it grants a suspension of deportation (Article 61(2)(6)) to applicants without status. Also regarding the rights of refugees, both laws provide basic rights to reside, work, and

travel. However, the Korean law distinguishes among categories; that the recognized refugees enjoy social security "equal to nationals" (Article 31), while applicants and humanitarian status holders receive only partial access to employment and public services. Japan, though aligning with the Convention in text, provides few integration measures in practice, reflecting a restrictive welfare and employment environment (Phillimore et al., 2021).

Third, the recognition procedure shows another key difference. In South Korea, applicants are sorted into categories and must undergo an interview with interpreter support and evidence submission. Although rejected applicants can appeal to the Ministry of Justice or the courts, the Korean Refugee Act's six-month decision deadline is often undermined by the pre-assessment system, which allows officials to reject claims before a full determination, reducing fair access to review. In Japan, any foreigner may apply for recognition without needing valid evidence at the start, but the process is tightly controlled by the Ministry of Justice. These procedural constraints concentrate discretionary power at the post-decision stage, allowing Japan to preserve formal access to the asylum system while sharply limiting the likelihood of successful recognition. In practice, both systems create a multi-stage recognition procedure, but barriers appear at different points: South Korea restricts access at the front end through pre-screening, while Japan imposes barriers at the back end through tight objection deadlines, ministerial control, and limits on repeat claims.

From a social constructivist perspective, state responses to international refugee obligations are shaped not only by material capacity or legal commitments, but by socially constructed identities, domestic norms, and shared understandings of appropriateness (Wendt, 1992; Finnemore & Sikkink, 1998). International law, such as the 1951 Refugee Convention, provides a normative baseline, but the interpretation and implementation of those norms and laws is mediated through each state's domestic political culture and self-perception. South Korea incorporates a humanitarian framework into its legal system, yet it differentiates access for others as a concession to public opinion and administrative concerns. South Korea's statutory framework extends protection beyond Convention baselines while simultaneously differentiating access to rights, enabling symbolic compliance with humanitarian norms alongside practical restriction. However, the law also distinguishes the different categories of individuals seeking protection. Recognized refugees receive full legal benefits, and the "humanitarian status holders" as stated in Article 2(3) and refugee applicants get fewer rights, as shown in conditional access to employment and public assistance. This differentiation lets the government appear accommodating to the global norm, while it also accommodates to the domestic and public concerns of giving off too many benefits to those who are not formally recognized as refugees. Japan, meanwhile, retains a legal framework that is textually almost identical to the Convention and embeds rights such as travel documents and permanent residence for recognized refugees. However, the country's

long-standing identity narrative of homogeneity and administrative culture of control lead to restrictive evidentiary standards, low recognition rates, and recent legal amendments limiting repeat applications. Here, the form of compliance sustains Japan's image as a responsible treaty party, but the practice reflects domestic norms that prioritize border integrity and social order over expansive refugee protection.

In both cases, the meaning of "refugee protection" is not fixed by the Convention alone but is redefined through domestic identity narratives and political pressures. South Korea's Refugee Act codifies protections that extend beyond the Convention, such as applying non-refoulement to applicants and humanitarian status holders, thereby signaling a humanitarian identity. Yet by simultaneously restricting employment and welfare access for these groups, the law embeds mechanisms of control designed to placate public concerns about resource competition and social cohesion. Japan, by contrast, sustains near-verbatim fidelity to the Convention through the ICRRA but interprets it in ways that reflect its long-standing narrative of homogeneity and administrative control, maintaining high evidentiary burdens, low recognition rates, and amendments limiting repeat claims. Thus, while Korea projects expansive protection in text but narrows it in practice, and Japan maintains textual compliance while restricting access procedurally, both approaches demonstrate that the practical meaning of refugee protection is mediated through domestic politics and identity rather than fixed by international law compliance.

Conclusion

While South Korea and Japan share a common legal foundation by adhering to the 1951 Refugee Convention and its 1967 Protocol, this study demonstrates that formal compliance with international refugee law does not result in uniform outcomes. Instead, both nations reinterpret international obligations through the lens of domestic legal structures and identity-based political pressures.

South Korea expands protection in statutory form by extending non-refoulement to applicants and humanitarian status holders and by codifying social rights for recognized refugees. However, the categorization of protection groups simultaneously limits access to those rights in practice, creating a system that appears progressive in its legislation but remains highly restrictive in its practical application. Japan, by contrast, preserves near-verbatim fidelity to Convention language within the ICRRA but narrows protection through procedural barriers, administrative control, and high evidentiary thresholds. Essentially, South Korea restricts through status differentiation, whereas Japan restricts through procedural barriers.

When viewed comparatively, these cases highlight a fundamental limitation of international refugee law: treaty conformity in a nation's statutes does not guarantee substantive compliance. States may either expand statutory categories while weakening implementation (as in Korea) or maintain formal legal alignment while embedding restrictive administrative practices (as in

Japan). Both strategies allow governments to preserve international legitimacy while responding to domestic pressures shaped by identity, homogeneity narratives, and political concerns over social cohesion.

This suggests a more general hypothesis applicable beyond East Asia: where refugee protection challenges dominant national identity narratives, states are likely to adopt forms of symbolic or procedural compliance that satisfy international expectations while constraining real access to protection. The divergence between Korea and Japan therefore illustrates how international norms are filtered, reshaped, and ultimately limited by domestic political and social structures.

Submitted: December 12, 2025 EDT. Accepted: April 04, 2026 EDT. Published: April 07, 2026 EDT.

This is an open-access article distributed under the terms of the Creative Commons Attribution 4.0 International License (CCBY-4.0). View this license's legal deed at http://creativecommons.org/licenses/by/4.0 and legal code at http://creativecommons.org/licenses/by/4.0/legalcode for more information.

References

Bell, M. (2022, January 5). *Japan's self-destructive immigration policy*. The Japan Times. https://www.japantimes.co.jp/opinion/2022/01/05/commentary/world-commentary/japans-immigration-policy/

Byrne, R., & Gammeltoft-Hansen, T. (2020). International Refugee Law between Scholarship and Practice. *International Journal of Refugee Law*, *32*(2), 181–199. https://doi.org/10.1093/ijrl/eeaa011

Choi, A. Y. (2021). *Politics of refugee reception in South Korea: Liberal norms and restrictive institutions* [Doctoral dissertation, University of California, San Diego]. https://escholarship.org/content/qt0x64z9bp/qt0x64z9bp_noSplash_69464e1aaac566fc393486a837366e53.pdf

Choi, E. C., & Park, S. Y. (2020). Threatened or Threatening?: Securitization of the Yemeni Asylum Seekers in South Korea. *Asian Journal of Peacebuilding*, *8*(1), 5–28. https://doi.org/10.18588/202005.00a118

Convention Relating to the Status of Refugees (opened for signature July 28, 1951), 189 U.N.T.S. 137 (1954). https://www.unhcr.org/sites/default/files/legacy-pdf/4ca34be29.pdf

European Union. (2025). *Asylum decisions - annual statistics - Statistics Explained - Eurostat*. Europa.Eu. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Asylum_decisions_-_annual_statistics

Finnemore, M., & Sikkink, K. (1998). International Norm Dynamics and Political Change. *International Organization*, *52*(4), 887–917. https://doi.org/10.1162/002081898550789

Immigration Bureau, Ministry of Justice, Japan. (2016). *2016 Immigration Control*. https://www.moj.go.jp/isa/content/930003204.pdf

Immigration Control and Refugee Recognition Act, Act No. 319 of 1951 (Japan). (n.d.). https://www.japaneselawtranslation.go.jp/en/laws/view/174

Immigration Services Agency of Japan. (2023). *Immigration Control and Residency Management 2023*. https://www.moj.go.jp/isa/content/001430186.pdf

Immigration Services Agency of Japan. (2024). *Immigration Control and Residency Management 2023*. https://www.moj.go.jp/isa/content/001407637.pdf

Japan Association for Refugees. (2017). *Why Japan recognizes only a few refugees? Institutional challenges*. Refugee Support in Japan | Certified NPO Japan Association for Refugees. https://www.refugee.or.jp/en/reports/articles/2017/09/japan_recog17_en/

Japan Association for Refugees. (2024, March 31). *Refugees in Japan*. https://www.refugee.or.jp/en/refugee/#section03

Jung, M. (2025, February 3). *Korea's asylum acceptance rate at 2.7% amid 122,000 applications*. Koreatimes.Co.Kr; The Korea Times. https://www.koreatimes.co.kr/southkorea/globalcommunity/20250203/koreas-asylum-acceptance-rate-at-27-amid-122000-applications

Kasai, T. (2023, June 15). *Japan immigration law creates new obstacles for asylum seekers: Heightened risk of refugee applicants being returned home to harm*. Human Rights Watch. https://www.hrw.org/news/2023/06/15/japan-immigration-law-creates-new-obstacles-asylum-seekers

Kobayashi, M. (2023, March 9). *Statement opposing the bill for amendments to the Immigration Control and Refugee Recognition Act*. Japan Federation of Bar Associations. https://www.nichibenren.or.jp/en/document/statements/230309.html

Lee, S. (2019). South Korea's refugee policies: National and human security perspectives. In B. Howe (Ed.), *Human security and cross-border cooperation in East Asia* (pp. 227–248). Springer. https://doi.org/10.1007/978-3-319-95240-6_11

Lee, S. (2024). Refining refugee protection in Korea: Legislative reforms and judicial interpretations of the Refugee Act. *The Korean Journal of International and Comparative Law*, *12*(2), 270–289. https://doi.org/10.1163/22134484-12340210

Macrotrends. (2023). *Germany Refugee Statistics | Historical Chart & Data*. Macrotrends.Net. https://www.macrotrends.net/global-metrics/countries/deu/germany/refugee-statistics

Ministry of Unification. (2025, March). *Settlement support for North Korean defectors*. https://www.unikorea.go.kr/eng_unikorea/whatwedo/support/%3B

Moon, J. (2025, February 5). *South Korea rejects most asylum seekers as refugee recognition rate stays at just 2.7% - The Korea Herald*. The Korea Herald. https://www.koreaherald.com/article/10412679

National Legislative Bodies / National Authorities. (1994, January 1). *Japan: Guide to the procedure for recognition of refugee status*. UNHCR Refworld. https://www.refworld.org/legal/decreees/natlegbod/1994/en/19617

Obi, N. (2013). *A review of assistance programmes for asylum seekers and refugees in Japan* (New Issues in Refugee Research, Research Paper No. 259). UNHCR, Policy Development and Evaluation Service. https://www.unhcr.org/sites/default/files/legacy-pdf/51f6680d9.pdf

Omata, N. (2015, October 7). *Open wallet, closed doors: Exploring Japan's low acceptance of asylum seekers*. Migration Policy Institute. https://www.migrationpolicy.org/article/open-wallet-closed-doors-exploring-japan%E2%80%99s-low-acceptance-asylum-seekers

Paek, Y., & Koo, G. Y. (2021). The changes in refugee issues in Korea through domestic newspapers. *Journal of the Korean Geographical Society*, *56*(2), 129–147. https://doi.org/10.22776/kgs.2021.56.2.129

Phillimore, J., Morrice, L., Kabe, K., Hashimoto, N., Hassan, S., & Reyes, M. (2021). Economic self-reliance or social relations? What works in refugee integration? Learning from resettlement programmes in Japan and the UK. *Comparative Migration Studies*, *9*(17). https://doi.org/10.1186/s40878-021-00244-3

Plantilla, J. R. (2023). Japanese immigration law in 2023: Changes and issues. *FOCUS*, 113. https://www.hurights.or.jp/archives/focus/section3/2023/09/japanese-immigration-law-in-2023-changes-and-issues.html

Protocol Relating to the Status of Refugees (Opened for Signature January 31, 1967), 606 U.N.T.S. 267 (1967). https://www.unhcr.org/sites/default/files/legacy-pdf/4ca34b5e1.pdf

Refugee Act. (2016). Korea Legislation Research Institute. https://elaw.klri.re.kr/eng_service/lawView.do?hseq=43622&lang=ENG

Soh, C., & Lund, B. (2014). The Refugee Act of Korea: The limits of civil society influence. *Korean Political Science Review*, *48*(3), 5–29. https://doi.org/10.18854/kpsr.2014.48.3.001

Takahara, K. (2023). *Japan's Cabinet OKs overhaul of immigration system*. The Japan Times. https://www.japantimes.co.jp/news/2023/03/07/national/immigration-law-revisions/

Takizawa, S. (2015). *Pilot refugee resettlement program: The Japan experience*. FOCUS Asia-Pacific. https://www.hurights.or.jp/archives/focus/section3/2015/12/pilot-refugee-resettlement-program-japan-experience.html

UNHCR. (2022). *UNHCR Submission for the Universal Periodic Review – Republic of Korea – UPR 42nd Session*. Refworld. https://www.refworld.org/policy/upr/unhcr/2022/en/124202

UNHCR. (2023). *UNHCR Korea fact sheet* [PDF]. https://www.unhcr.org/sites/default/files/2023-10/UNHCR_Korea_Fact%20Sheet_ENG_202309.pdf

UNHCR. (2025). *Figures at a glance: Malaysia*. https://www.unhcr.org/my/what-we-do/figures-glance-malaysia

United Nations. (2022, November 7). *Boosting mental health in Thailand's refugee camps*. United Nations in Thailand. https://thailand.un.org/en/206315-boosting-mental-health-thailand%E2%80%99s-refugee-camps

U.S. Library of Congress. (2023). *Refugee law in Japan*. https://maint.loc.gov/law/help/refugee-law/japan.php

Wendt, A. (1992). Anarchy is what States Make of it: The Social Construction of Power Politics. *International Organization*, *46*(2), 391–425. https://doi.org/10.1017/S0020818300027764

Wolman, A. (2013). Korea's Refugee Act: A Critical Evaluation under International Law. *Journal of East Asia and International Law*, *6*(2), 479–495. https://doi.org/10.14330/jeail.2013.6.2.07

Yamagata, A. (2023, November 30). *Asylum law tweaks don't change Japan's wariness of refugees*. East Asia Forum. https://doi.org/10.59425/eabc.1701340049

Zhu, Y. (2024). The legal framework for refugee acceptance and protection in Japan. In L. Moresco & P. Ivanova (Eds.), *Refugees and asylum seekers in East Asia: Perspectives from Japan and Taiwan* (pp. 93–117). Palgrave Macmillan. https://doi.org/10.1007/978-981-97-2867-1_4