

Against the Tide: The Counter-Repression Strategies of Sea Rescue Organizations in the Mediterranean

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Since 2017, Italian authorities have repressed nongovernmental sea rescuers operating in the Mediterranean Sea. These repressive practices have been enacted irrespective of the ideological orientation of the governments in office, but have evolved over time. The strategies devised by civil society organizations to resist repression have adapted accordingly, encompassing a range of activities such as the dissemination of counter-narratives aimed at desecuritizing migration, the establishment of alliances with sympathetic state actors, the reflagging or replacement of the ships used for rescue operations, and engagement in legal mobilization. This article examines how the repressive practices of the Italian government and the counter-repression actions of civil society organizations influenced one another from 2017 to 2023. We show that although governmental repression reduced civil society's rescue operations, the organizations' ability to adapt and engage in counter-repression strategies has ensured the continuation of their lifesaving activities.

Keywords: criminalization; repression; search and rescue; civil society; migration; European Union; Italy

In the summer of 2018, then-Italian Interior Minister Matteo Salvini attacked civil society organizations (CSOs) rescuing people on the

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move in the Mediterranean by declaring Italian ports closed to their ships, threatening criminal sanctions and exorbitant fines for those entering Italian waters, and even labeling a humanitarian vessel a “pirate ship” (Matteini 2018).

Salvini’s approach was not entirely new, but built on the repressive practices initiated by the previous government. Since then, a diverse set of policies and discourses have intensified the repression of sea rescue organizations, not only in Italy but among European Union (EU) nations more broadly (Allsopp, Vosyliūtė, and Smialowski 2021; Carrera, Allsopp, and Vosyliūtė 2018). Repressive discourses and practices have been implemented by different actors, including the law enforcement sectors of member states like Greece and Croatia as well as the EU Border and Coast Guard Agency Frontex. Despite this growing repression, CSOs have continued saving lives.

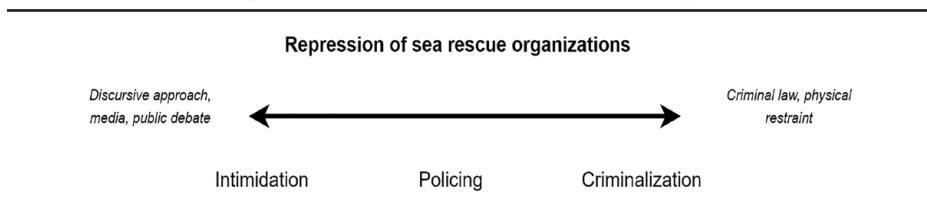
In this article, we focus on the Italian case, which—given the importance and deadliness of the Central Mediterranean corridor connecting North Africa to Italy—is crucial to understanding ongoing repression at maritime borders and its implications. Between 2014 and 2023, at least 22,000 people on the move lost their lives off the coast of Libya (International Organization for Migration, n.d.). In response to this tragedy, a variety of CSOs, ranging from established international charities like Médecins Sans Frontières (MSF) to *ad hoc* national groups like Mediterranea Saving Humans (MSH), have engaged in maritime rescue operations, saving no fewer than 110,000 people between 2014 and 2017 alone (cf. Cusumano and Villa 2021). The repression of their activities from 2017 onwards has arguably worsened the death toll for people on the move and increased the relative lethality of undocumented crossings (Cusumano and Villa 2021; Heller and Pezzani 2017).

In this study of the repression of solidarity at sea, we disentangle the way in which the Italian government’s repressive dynamics and civil society attempts to circumvent restrictions and engage in counter-repression strategies influenced one another from 2017 to 2023. In addition, we examine how this interaction has affected migrant mobility across the Central Mediterranean route.

By “repression,” we refer to a variety of discourses, policies, and practices that have been used to restrain the activities of civil society sea rescuers. These include intimidation (e.g., public stigmatization or threats), policing (e.g., control and surveillance measures), and full criminalization (i.e., the use of criminal law instruments to prosecute those engaging in solidarity) (cf. Fekete 2018). In our theoretical approach, intimidation, policing, and criminalization are the three milestones of governments’ repressive spectrum (see Figure 1), which, in turn, affect the CSOs’ counter-repression strategies that we discuss below.

Empirical evidence on the repression of solidarity at sea reveals a complex patchwork of discourses and practices that governments have employed, with two core dynamics at play. On the one hand, there was continuity in the tendency to repress the activities of sea rescue organizations in Italy between 2017 to 2023, regardless of the ideological orientation of the government in office. On the other, repression evolved into a diverse set of policies. As the outright criminalization of CSOs has not yet delivered any convictions but rather rallied—in some measure—public support for these organizations, Italian governments have

FIGURE 1
The Repression of Sea Rescue Organizations: A Spectrum



increasingly opted for subtler, less visible, and less controversial (at least for the general public) forms of repression. Examples of these are ship inspections, administrative sanctions, or the imposition of unjustified delays to the disembarkation of those rescued at sea.

This approach, in turn, has had a strong impact on the strategies adopted by sea rescue organizations in response to this evolving repression. These include a diverse set of counternarratives, forms of mutual assistance between CSOs, alliances with sympathetic state actors, the reflagging and replacement of ships, and instances of legal mobilization. Such activities, which we will discuss at length below, showcase the ability to strategically adapt to the changing context by adopting new courses of action that effectively mitigate or openly challenge repressive policies.

We look at repression and counter-repression by adopting a sociolegal perspective that combines elements of actor-centered institutionalism (Scharpf 1997) with the political opportunity structures (see della Porta [2013] for an overview) of sea rescue organizations. In other words, we consider the way in which the agency of both governmental and civil society actors is influenced by the institutional and legal context in which they move and by the opportunities and constraints therein.

Building upon these theoretical foundations, we argue, first, that the interplay between repression and resistance can be explained in terms of the policy learning and strategic adaptation dynamics prompted by changes in existing political opportunities structures. Second, from a policy and practice perspective, we contend that this evolution has had a major impact on human mobility across the Central Mediterranean corridor. On the one hand, government-driven repression has increased the costs and the risks attached to solidarity. On the other, the ability of CSOs to react promptly to repressive practices has ensured the continuation of hundreds of sea rescue and air reconnaissance missions, public advocacy, and the naming and shaming of human rights violations. While government strategies have effectively shrunk the maritime humanitarian space, CSOs’ ability to adapt and resist will likely enable them to continue their lifesaving activities in the near future. As such, the counter-repression strategies enacted by CSOs in the Mediterranean can be seen as best practices for civil society organizations operating at other borders worldwide.

The outline of the article is as follows: in the next section, we present our data and methods. The next two empirical sections address the making

of governmental repressive policies and sea rescue organizations' resistance practices, including counternarratives, mutual assistance, alliances with state actors, reflagging and changing ships, and legal mobilization. In the final section, we discuss these findings from both theoretical and policy perspectives.

Data and Methods

This article is based on three main sources of data: documents, 20 semistructured interviews, and field observations of three stakeholder conferences organized in Rome by the Italian government in 2016 and 2017 and two meetings between rescue organizations' representatives. All the material was collected in different phases throughout the period from 2017 to 2023. We triangulated these three types of sources with a view to maximizing the heuristic relevance of our data and the robustness of the analysis.

Documentary sources are diverse and include several types of data. For the first section of this article, focused on governmental repressive strategies, we considered mainly relevant legislation and regulations by examining all related official acts and policy documents, including the systematic analysis of the parliamentary proceedings related to the first phase of repressive policies (2017–2020). Relevant debates were chosen through a keyword search and based on the bill addressed in the session. The second section, dealing with CSOs' strategies of counter-repression, was mostly built on CSOs' press releases and internal documents relevant to the case at hand. We also focused on judicial acts related to the most significant criminal, civil, and administrative proceedings that took place in the period (significant cases had been previously identified through newspaper articles, secondary literature, and semistructured interviews). In both sections, relevant newspaper articles were identified through search engines.

Semistructured interviews and field observations were conducted in several rounds from February 2017 to June 2023. The 20 interviewees are civil society activists and experts, who were selected based on their expertise and knowledge of the phenomenon as well as through snowball sampling. Six of these interviews are directly cited in the article, while the others served for building background knowledge and for triangulation purposes. Not all interviewees are Italian, but all of them do have direct experience with or knowledge of the sea rescue context and repressive dynamics in Italy. Last, secondary sources were also used, mostly with a view to understanding the background and identifying relevant primary sources.

We performed data analysis of relevant legislation and other normative documents by using legal analysis techniques, whereas we approached documentary sources, interviews, and field observations with an inductive qualitative content analysis (Mayring 2000). By combining these different sources and analytic techniques, we aimed to gain an in-depth understanding of the agency of CSOs and

their diverse strategies, while ensuring due consideration of the legal framework and institutional constraints.

Intimidation, Policing, and Criminalization: A Composite Policy Framework

The origin of the systematic repression of sea rescue activities in the Mediterranean Sea dates back to 2017, when the interplay between EU agencies and the Italian judiciary and policymakers triggered the first accusations that CSOs were violating Italian law by facilitating undocumented migration (Cusumano and Villa 2021).

Earlier episodes of repression had taken place well before, in the early 2000s, but no systematic targeting of civil sea rescue occurred before 2017. On the contrary, CSOs were largely praised as “angels,” invited to attend institutional meetings, and given awards. For instance, the president of the Italian Republic, Sergio Mattarella, in 2015 awarded the founders of Migrant Offshore Aid Station’s (MOAS) a medal for their outstanding contribution “to assisting migrants in distress” (Cusumano and Villa 2021). This collaborative approach was widespread across EU Mediterranean countries, as the words of a Spanish sea rescue activist confirm:

When we started operating in the Mediterranean, . . . we were very much supported by the civil society, but above all by institutions: for example, the first rescues [that we made in 2016] were coordinated by the Italian Coast Guard [and] supported by the Maltese Coast Guard, and the Spanish government did not cause any trouble, quite the contrary. . . . Our work was really supported, a collaboration with institutions existed, and we had very good results.¹

Since 2017, by contrast, a variety of repressive measures against CSOs—pertaining to discursive, operational, and judicial dimensions—has been set out by Italian policymakers from five different governments (see Table 1).

The policy framework developed under these five cabinets is multilayered and diverse, including a panoply of legal, administrative, and practical measures.

The first act was the 2017 code of conduct on maritime rescue, designed by then Interior Minister Minniti and aimed at intimidating and indirectly restricting CSOs’ activities in the Mediterranean Sea. Most of the measures included in the code of conduct reiterated legal obligations that sea rescue organizations were already complying with (e.g., keeping geolocalization transponders on and communicating with flag-state authorities and the Italian Maritime Rescue Coordination Centre [MRCC]). Others were insinuating, as they implied that CSOs were deliberately facilitating undocumented migration by violating the prohibitions on entering Libyan territorial waters and communicating with human smugglers through lights and other signals. Notably, some measures were unnecessarily burdensome for small organizations. For instance, the prohibition against transferring rescued people from one boat to another would force smaller

TABLE 1
Italian Governments since 2017

Time Frame	Head of Government	Interior Minister	Parliamentary Majority
2017–2018	Paolo Gentiloni	Marco Minniti	Center-left
2018–2019	Giuseppe Conte	Matteo Salvini	Right-wing/populist
2019–2021	Giuseppe Conte	Luciana Lamorgese	Center-left
2021–2022	Mario Draghi	Luciana Lamorgese	National unity
2022–present	Giorgia Meloni	Matteo Piantedosi	Right-wing (including far right)

vessels to disembark them directly to ports that were several days of navigation away—a requirement that imposed unsustainable costs on small, volunteer-run CSOs. Finally, measures like the obligation to report suspect smugglers, share video footage to be used in court, and accept armed police personnel aboard ships were at odds with the principles of neutrality and impartiality that underlie humanitarian action (Ministero dell'interno 2017b).

Notwithstanding the code's nonbinding nature and limited effects, several CSOs, including MSF and Sea-Watch, did not sign it (Camilli 2017; Médecins Sans Frontières 2017). In an effort to safeguard the support of Italian authorities, other organizations opted for a less confrontational approach and decided to sign the document, either immediately (e.g., MOAS and Save the Children) or later, after obtaining clarifications from the Italian government, as in the case of SOS Méditerranée (Ministero dell'interno 2017a, 2017b).

A second and more vexing component of this repressive framework is the 2018–2019 closed-ports policy for CSO vessels, designed by Salvini and later briefly revived by the current interior minister, Matteo Piantedosi. This proposal was enacted by denying or delaying the assignment of a place of safety (POS)² (Associazione per gli Studi Giuridici sull'Immigrazione 2019a, 2019b), by directives of the interior minister (e.g., Ministro dell'interno 2019a, 2019b, 2019c, 2019d), and by interministerial decrees (Ministro dell'interno 2022). A more discreet, but equally vexing, late POS assignment practice also persisted during the period 2020 to 2021, under the mandate of Luciana Lamorgese (Cusumano and Villa 2021).

The third pillar of this multilayered repression strategy is composed of four so-called security decrees designed by Salvini, Lamorgese, and Piantedosi.³ These adopted a more restrictive approach to migration and a repressive attitude towards sea rescue solidarity by, among other things, enabling the interior minister to levy exorbitant fines on CSOs entering Italian territorial waters without permission and to confiscate their ships. Only Lamorgese's decree included some limited, more beneficial provisions for civil society ships, but without overturning Italy's broader repressive approach (cf. Consiglio Italiano per i Rifugiati 2020). However, this decree was consistently framed—both by Lamorgese and her opponents, including Salvini—as fundamentally different from the others; its characterization as being supportive of sea rescue organizations exposes the gap

between political discourse and policy outputs and the attempt to disguise its substantively repressive nature.⁴

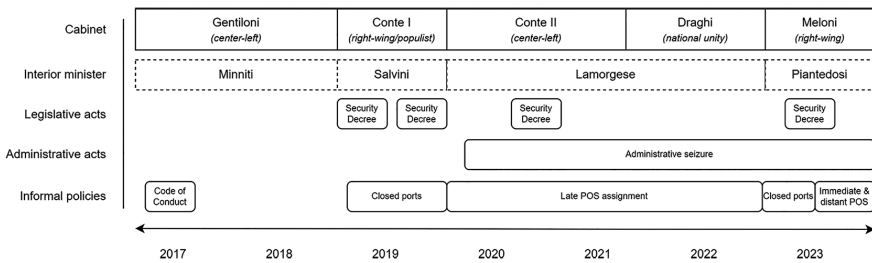
A fourth component of the repression of CSOs has been the 2019 to 2023 administrative seizure policy, inaugurated by Lamorgese and continued by Piantedosi. The policy, which consists largely of leveraging administrative rather than criminal legal provisions, was developed after the repeated failure to restrain civil rescue through criminalization. At the time of this writing, none of the sea rescue activists prosecuted has been convicted, and the vast majority of cases have been dismissed (Alagna 2024). Furthermore, while ostensibly less vexing than criminal charges, administrative measures, such as fines and confiscations, can be levied more easily and reduce the possibility for due process, circumventing the legal guarantees that would be offered to sea rescuers as defendants in a criminal case (Alagna and Cusumano 2023). Its first applications, driven by the political calculations of the government, took the form of the systematic inspection of sea rescue vessels by the Italian Coast Guard (Ziniti 2020). Remarkably, when the European Commission decided to replicate this approach at the EU level and regulate sea rescue through technical and maritime norms, Lamorgese claimed authorship of the policy shift.⁵ Piantedosi later decided to translate this approach into hard law and included it in Decree-Law n. 1/23. Based on this policy, numerous vessels have been repeatedly blocked in harbors on the basis of maritime safety and environmental regulations (European Union Agency for Fundamental Rights 2022).

Most recently, in 2023, Piantedosi inaugurated the one-rescue-at-a-time policy, requiring CSO vessels to disembark people they had rescued before engaging in another mission (Ziniti 2022). Complying with this measure means that CSO ships spend valuable time sailing back and forth to Italian ports, resulting in gaps in search-and-rescue (SAR) capabilities. Ironically, this policy reverses the strategy of delaying POS assignment and instead designates the port for disembarkation immediately after the official communication of the completion of a SAR operation (Decree-Law n. 1/23; see also Masera 2023). Furthermore, to maximize the effectiveness of the policy, the ports assigned for disembarkation are largely in northern and central Italy, very far from where rescue operations are conducted. The need to travel such large maritime distances greatly increases both the fuel costs and the time spent at sea by CSO crews and rescued people alike. These lengthy voyages are especially vexing for smaller organizations.

Depending on the legislative framework involved, these policies can be grouped into three different categories: legislative acts (i.e., hard laws), administrative acts (i.e., governmental and other state institutions' provisions), and informal policies (i.e., measures not based on any specific normative act or sometimes even fully lacking any normative grounds).⁶ To offer a clearer image of the different policies and their evolution, Figure 2 provides a timeline.

By looking at continuity and change across these measures, it becomes apparent that the five Italian cabinets and the four interior ministers that served therein have consistently repressed the role of sea rescue organizations in the Mediterranean Sea, despite the different political shadings of their parliamentary majorities. Policy changes have not translated into a fully-fledged departure from a repressive approach: rather, they were limited to policy discourses

FIGURE 2
Sea Rescue Repressive Policies under Five Different Italian Cabinets



and a preference for more direct or subtler forms of intimidation, policing, and criminalization—all within the same overall repressive framework. In the sharp words of a sea rescue activist, “Salvini would not exist without Minniti.”^{7,8}

Based on this picture, we argue that any change in the approach to sea rescue civil society is merely an evolution within the same repressive framework, one resulting from a number of factors. The first, main explanation relates to the attempt to reduce the visibility and political costs of policies of intimidation, policing, and criminalization. This was especially the case with the center-left *Conte II* cabinet, which wanted to mark a *formal* discontinuity with its predecessors through discursive change. A second major explanation is associated with the judicial arena, where criminalization failed *tout court* (as noted above, at the time of this writing none of those prosecuted had been convicted, and the vast majority of cases had been dismissed) and even backfired. A remarkable example of these unsuccessful criminalization attempts is Sea-Watch shipmaster Carola Rackete’s arrest for violating the prohibition against entering Italian waters in June 2019 and for breaking other Italian laws; charges were dismissed as her acts were ruled justified by *force majeure*, namely, the duty to rescue lives. This overall failure has arguably shifted the government’s repressive approach toward the use of softer, alternative repressive instruments, like administrative sanctions and late POS assignment (Alagna 2024).

In sum, the hostile environment for sea rescue organizations has persisted from 2017 to 2023, although the intensity and content of repressive strategies has varied. This swing between continuity and change—and the reasons behind it—is critical to understand the practices of resistance enacted by CSOs as a result.

Sea Rescuers’ Resistance and Counter-Repression Practices

Like government repression measures, CSOs’ response strategies have spanned across the discursive, operational, and judicial dimensions. Specifically, sea rescue CSOs, often in collaboration with a broader network of civil society actors, have (1) disseminated counternarratives that tackle disinformation and seek to

desecuritize undocumented migration, (2) engaged in mutual assistance and solidarity in order to resist repression and to continue saving lives, (3) forged alliances with sympathetic state actors, (4) reflagged and changed their ships to navigate tightening constraints, and (5) pursued a variety of legal mobilization approaches to reverse prosecutions and hold state officials accountable for the violation of the fundamental rights of people on the move.

Counternarratives

The discursive stigmatization of CSOs' lifesaving work underlying Italian governments' repression was ultimately informed by the broader securitization and criminalization of migration to Europe. In a context where undocumented mobility was presented as a crime and a threat to the Italian population, rescue operations could be framed as promoting "illegal immigration," and CSOs stigmatized as "in cahoots with human smugglers."⁹ Consequently, CSOs have attempted to spread counternarratives aimed at desecuritizing migration and breaking the discursive link between solidarity at sea, undocumented migration, and human smuggling that had become salient in Italian media since mid-2017 (Cusumano and Bell 2021).

Several types of counternarratives can be identified. First, CSOs have tried to reverse the tendency to present rescued people as a nameless, threatening mass by telling their individual stories. To that end, they have used their ships as advocacy platforms to illustrate the suffering experienced by people on the move in their journey and denounce the violence used by Libyan authorities. SOS Méditerranée's "Voices from the Sea," Sea-Watch's "Stories from the Sea," and MSF's "Testimonies from Refugees" webpages are cases in point.

Second, CSOs have sought to debunk those "pseudo-causal narratives" of migration across the Mediterranean (Zaun and Nantermoz 2022), namely, those arguments that, albeit not being supported by any solid evidence, were nevertheless used to justify restrictive border enforcement policies. The claim that rescue operations were a pull factor of undocumented migration, causing more people to risk their life at sea, is a case in point. Accordingly, CSOs have disseminated relevant academic studies disproving the correlation between rescue operations and unauthorized departures from Libya (Cusumano and Villa 2021); some organizations, like MSF, have conducted their own research on the subject. To minimize the effects of stigmatization and groundless accusations, CSOs have also adopted a strategy of maximum openness. Notably, many organizations allowed for and openly encouraged the presence of journalists, writers, and opinion-makers aboard their ships to both convey a message of transparency and help disseminate their counternarratives.

Last, CSOs have turned the visibility inadvertently provided by spectacular and highly publicized criminal cases into an advocacy platform. The abovementioned arrest and subsequent release of Carola Rackete, for instance, helped rally a broad coalition of Italian and international actors in support of Sea-Watch, which experienced much higher media salience and a significant increase in donations. The fact that this and other prosecutions failed to deliver convictions and ultimately helped CSOs arguably urged Italian authorities to reconsider

overly confrontational repression strategies like Salvini's closed-ports policy (Alagna 2024).

Mutual assistance

Contrary to arguments that nongovernmental actors providing similar services are bound to develop competitive relationships, the CSOs providing maritime rescue off the coast of Libya have cooperated closely with one another (Cusumano 2021). CSOs publicly defended and provided legal advice to other organizations accused of wrongdoings; released joint statements; and exchanged equipment, crew members, and information. These forms of solidarity helped organizations resist repression and continue rescue operations in an increasingly hostile environment.

For instance, Jugend Rettet—the first organization whose members were prosecuted—benefited from widespread solidarity across CSOs, almost all of which issued statements and joined public campaigns stressing that maritime rescue is not a crime. Moreover, some provided legal and financial support, such as Sea-Watch, which created a legal aid fund to assist prosecuted activists from Jugend Rettet and other organizations. Sea-Watch and MSF also shared equipment with other organizations in order to help CSOs whose ships had been impounded. MSF, for example, transferred one of its vessels to Sea-Watch, which in turn handed over its older ship to Mission Lifeline. Experienced crew members also joined other organizations' missions, thereby transferring their knowledge to newcomers.

As the Italian MRCC became increasingly less open and supportive of CSOs, information sharing also became vital for rescuers to continue their lifesaving work. Organizations running air patrol missions or serving as a contact point for people in distress, like Sea-Watch and Watch the Med Alarmphone, have constantly disseminated information to other CSOs. This information-sharing network helped make up for Italian authorities' unwillingness to coordinate rescue operations, thereby serving, in the words of activists, as a "civil MRCC."

Finally, like-minded rescue organizations issued joint statements to maximize the effect of their advocacy and naming-and-shaming campaigns.

Alliances with sympathetic state actors

States are not monolithic entities. Hence, while Italian and other European governments turned against CSOs, rescue organizations could still rely on a large network of state actors who were openly sympathetic to their efforts or, at least, unwilling to repress them.

Notably, many organizations leveraged the solid working relationship they had developed with Italian Coast Guard officials, who have been widely socialized to the duty to rescue people in distress at sea. This relationship was so positive that activists used to refer to the Italian MRCC as "MumRCC" because of their protective approach toward CSOs. Even after 2017, when cooperation was upended

by political decisions, some active-duty and retired Coast Guard officers continued to collaborate with CSOs, sharing information and legal advice. Likewise, rescue organizations found some support within the Italian and other European navies. Notably, in his testimony before the Italian parliament, Italian Admiral Enrico Credendino—in charge of the EU Common Security and Defence Policy (CSDP) mission EUNAVFOR MED Operation Sophia—refuted the accusation that CSOs were a pull factor of migration (Cusumano and Villa 2021).

CSOs could also rely on several sympathetic actors at the supranational levels. The president and the parliamentary assembly of the Council of Europe, the European Court of Human Rights, the United Nations High Commissioner for Human Rights (OHCHR), and the United Nations High Commissioner for Refugees (UNHCR) have all denounced the repression of solidarity at sea and its tragic consequences. At the EU level, CSOs found especially strong support from the European Union Agency for Fundamental Rights—which issued numerous statements in defense of people on the move and rescuers alike—and from part of the European Parliament and, in particular, the Committee on Civil Liberties, Justice and Home Affairs (LIBE).¹⁰ In light of that, the two European Parliament (2018, 2023) resolutions against the criminalization of SAR activities are noteworthy.

At the local level, cities within and outside Italy are worth mentioning. Sea rescue organizations have pursued cooperation with local governments since the very early phases of repressive policies, based on the understanding of “the relationship between struggles for migrants’ rights and potential responses within urban contexts and at a local institutional level.”¹¹ The outbreak of sea rescue repression in 2017 made CSOs realize “that a tough disconnection existed between institutions which are closer to citizens and those that are less so, that is between municipalities and states.”¹²

A remarkable example of these early instances of cooperation is the loose network known as the Palermo Charter Platform Process, which advocates for a radical change in EU migration policy and comprises several European cities and CSOs (Watch the Med – Alarmphone 2018a, 2018b, 2019). The project has recently evolved into a more structured organization, based on the dual network From the Sea to the City/International Alliance of Safe Harbours (FSTC/IASH [From the Sea to the City 2021a, 2021b; International Alliance of Safe Harbours 2021]). Single CSOs also established relationships with specific municipalities. Examples include the Spanish organization Open Arms, through its informal meetings with mayors and its cooperation with the city of Barcelona¹³ (Barcelona al día 2019; Otero 2019), or the Italian CSO Mediterranea Saving Humans, through its work with the city of Palermo¹⁴ (From the Sea to the City 2021a, 19–25).

Collaboration took three different forms. The first is advocacy, as cities became proactive and showed their willingness to be militant actors.¹⁵ For example, numerous Italian cities offered their port to the ship *Aquarius* during the first stand-off between Salvini and CSOs in 2018¹⁶ (Wintour, Tondo, and Kirchgaessner 2018), and Spanish mayors played an advocacy role after the impoundment of the ship *Open Arms* and the prosecution of its crew (Barcelona

al día 2019). Following these examples, many mayors across Europe raised their voice in solidarity with sea rescue organizations and declared themselves open harbors. Moreover, some cities have offered support to legal mobilization efforts (see the section below): in what may be the most remarkable example of this kind of support, the cities of Palermo and Barcelona were admitted as civil parties in Salvini's trial for kidnapping and dereliction of duty.¹⁷ Last, cities have also provided financial support to sea rescue organizations¹⁸ (Barone 2018; City of Paris 2021).

Activists stressed that the aim of this cooperation with city governments has not merely been that of “developing ‘good governance’ experiences at a local level” but rather that of promoting a deep and systemic change by exploring “how, within these very municipal experiences, true bottom-up alternative policies can be structured.”¹⁹

Reflagging and replacing ships

Since the beginning of their operations, nongovernmental rescuers have been able to leverage two of the most revered principles in the international law of the sea: the maritime rescue norm, which obligates all shipmasters to assist people in distress and disembark them in a place of safety; and freedom of navigation, which allows all vessels to roam international waters and enter states' territorial sea in accordance with the principle of innocent passage. As mentioned above, however, Italian governments have started delaying or obstructing disembarkations and construed rescue ships' entry into territorial waters as detrimental to national security and therefore as noninnocent passage. In response, CSOs have purposively changed the ships they used for rescue operations and the flags they were flying.

The prohibition against disembarking rescued people onto bigger ships first outlined in the 2017 code of conduct, the lengthier stand-offs caused by the closed-ports policy, and the latest tendency to assign very distant disembarkation ports have all combined to encourage CSOs to buy or charter larger and faster ships. For instance, Sea-Watch first obtained one of MSF's older ships and then bought an oceanographic research vessel. Open Arms, originally operating from a sailing boat, acquired two larger ships. In order to contain the growing costs attached to larger and more modern vessels, various CSOs started pooling resources and joining forces. MSF and SOS Méditerranée, for instance, have long operated the *Aquarius* in partnership, while the *Humanity I* is now run in partnership by Sea-Watch, SOS Humanity, and the broader coalition of organizations known as United4Rescue.

As Italian governments pressured other states to scrap rescue vessels from their registries, several CSOs reflagged their ships, choosing countries that were more sympathetic to their cause. When the Netherlands and Panama deprived Sea-Watch and SOS Méditerranée of their flags, for instance, both organizations reflagged their ships, opting for Germany and Norway, respectively. Last, and perhaps most interesting, Mediterranean Saving Humans started operations at the height of Salvini's closed-ports policy from a vessel flying the Italian flag, the

Mare Jonio. As the Italian government contemplated banning foreign-flagged vessels from its territorial waters by framing their entry as noninnocent passage, conducting rescue operations from an Italian-flagged ship was a way to both openly challenge Italian policy and leverage international law to circumvent existing prohibitions.²⁰

Legal mobilization

Sea rescue organizations have also increasingly engaged in legal mobilization, progressively using the judicial arena as a venue of political contention and turning their approach from merely defensive to offensive. This strategy covered different jurisdictions (administrative, civil, and criminal) and levels (national, EU, and international).

Among the first, remarkable examples is the appeal filed by Open Arms against the ban imposed by then–Interior Minister Salvini to the disembarkation of rescued people in Italy. On that occasion, the Regional Administrative Court of Lazio (2019) overturned the interior minister’s decision and allowed Open Arms’ rescue vessel to enter Italian waters and disembark those aboard (see also Hauswedell 2019). The use of administrative courts to challenge repressive governmental policies has increased since then. Other important cases include motions filed by Sea-Watch in 2020 against Lamorgese’s administrative sanctions and seizure policy and MSF’s appeal against the POS operational protocol set out by Piantedosi. In the former case, the Regional Administrative Court of Sicily referred the matter to the Court of Justice of the European Union, which found that port state controls cannot be arbitrary and overly lengthy but need to be motivated and timely (Court of Justice of the European Union 2022; Merli 2021; Sea-Watch 2020). In the latter case, MSF’s appeal was rejected by the court—a decision that may have encouraged CSOs to challenge Piantedosi’s policy in civil jurisdictions instead.²¹

Civil courts have also proved fruitful venues for legal mobilization, especially in recent times. In a case initiated by SOS Humanity and signed by 35 people rescued and denied disembarkation in November 2022, the Civil Court of Catania found Piantedosi’s interministerial decree unlawful (Merli 2023). A few months later, SOS Humanity, Mission Lifeline, and Sea-Eye appealed to the Civil Court of Rome against the assignment of POSs in northern and central Italy. This case is also pending at the time of this writing (Candito 2023).

Finally, CSOs also made offensive use of criminal jurisdiction against Italian authorities. Here, the most significant case is the trial of former Interior Minister Salvini, who—as of March 2024—is still facing kidnapping and other charges in the Court of Palermo for blocking the disembarkation of 164 people in 2019. This trial is the result of charges pressed by the CSO Open Arms (Associated Press in Rome 2021).

EU and international tribunals may play an important role in future strategies of sea rescue organizations alongside national courts. The Sea-Watch case described above demonstrates that EU legislation and case law can be beneficial for civil society activities. CSOs may also indirectly benefit from international

courts' decisions surrounding the violation of people on the move's fundamental rights. For example, the case of *Hirsi Jamaa and Others v. Italy*, where Italy was found to violate the right of asylum (European Court of Human Rights 2012), established an important precedent. CSOs' request for the International Criminal Court to consider large-scale human rights violations in Libya and in the Mediterranean Sea could likewise deliver a significant decision.

CSOs' legal mobilization efforts have been supported by a broad network of allies, including activist lawyers like those participating in the Italy-based network *Associazione per gli studi giuridici sull'immigrazione*. Moreover, as the decisive judicial reaction to Piantedosi's approach in 2022 to 2023 shows, this counter-repression strategy has gained momentum and become systemic. Arguably, insofar as case law is widely favorable to sea rescue organizations, effective legal mobilization could encourage further acts of civil disobedience. However, as one activist emphasizes, caution is always in order, as "at the end of the day, the risk is that trials on us end up badly and those on them come to nothing."²²

Discussion and Conclusion

Since 2017, Italian governments have repressed solidarity at sea through a variety of measures. By engaging in the different counter-repression strategies outlined above, CSOs have effectively resisted that repression and preserved their ability to operate at sea. These strategies, however, have not neutralized—only mitigated—the effects of repression. Figures on the people on the move rescued by CSOs are a case in point. Between 2017 and 2019, these numbers plummeted from more than 40,000 to fewer than 1,000. This drop was not caused solely by the declining number of departures resulting from Italy's externalization agreement with Libya's tribes nor by Italy's restrictive migration policies more broadly. As some CSOs stopped rescue operations (due to ongoing repression) and ships were frequently absent from the rescue scene (due to disembarkation standoffs and impoundments), the relative share of CSOs' rescue operations shrank from around 35 percent in 2017 to less than 8 percent in 2019 (Cusumano and Villa 2021).

In a political climate featuring extreme polarization and landslide electoral victories for anti-immigration parties, CSOs' counternarratives often fell on deaf ears and proved unable to shift public opinion toward a less restrictive approach. Conversely, the confrontational anti-immigration stance of politicians like Salvini and Meloni has often paid off in electoral contests. While ultimately unsuccessful, Salvini's closed-ports policy boosted approval for the League throughout 2018 and 2019. Likewise, Meloni's airing of a naval blockade, albeit illegal and unfeasible, arguably helped her secure a resounding victory at the 2022 general elections.

Mutual assistance and solidarity across CSOs were partly hindered by their very different identities and rescue practices. Notably, CSOs like MOAS and Save the Children shied away from directly criticizing European

migration policies and sought to preserve a collaborative relationship with the Italian government, while organizations like Sea-Watch and *Mediterranea Saving Humans* have developed a much more confrontational and openly political approach. Although the relationship between CSOs has been broadly cooperative, these very different approaches have sometimes caused friction, hindering the ability of organizations to join forces and form a unified front against repression. Already in 2016, MOAS and MSF discontinued what had initially been a joint mission due to “diverging views” (Cusumano 2021, 555). Controversial practices, like *Save the Children’s* policy of hiring private security contractors to be deployed aboard its ship, inadvertently helped governmental repression. These guards—one of whom was an undercover police officer—spied on other CSOs and gathered materials later used in the trial against *Jugend Rettet*. The fact that both MOAS and *Save the Children* immediately signed the 2017 code of conduct prevented civil society actors from developing a cohesive policy against repression; their decision also helped hostile politicians and prosecutors to leverage divisions within the humanitarian front by distinguishing between “good” and “bad” CSOs and then stigmatizing them all through a “guilt by association” strategy (Cusumano 2021; Cusumano and Bell 2021).

Alliances with sympathetic state actors also entail inevitable limitations. After the repression of civil society rescue operations became official policy, governmental agencies like the Coast Guard were ordered to discontinue their collaboration with CSOs; officers seen as too supportive of their cause eventually retired or were often rotated to other positions (Cusumano and Villa 2021). Albeit offering to serve as a port of disembarkation is a powerful symbolic statement, the assignment of a POS is a decision taken at the government level that does not take into account municipalities’ preferences. Likewise, the support of members of the European Parliament has little concrete impact, given the parliament’s marginal powers in the Area of Freedom, Security and Justice, which covers asylum and migration policy.

Ship change and reflagging also come with downsides. While faster and capable of staying at sea for longer, larger ships are costlier to staff, maintain, and refuel, making the costs of conducting rescue operations unsustainable for smaller charities. Flag change entails trade-offs as well, as flying the flags of European countries like Germany and Italy implies higher taxes and requires compliance with stricter safety and environmental regulations.

Last, as noted above by one of the activists we interviewed, engaging in legal mobilization is an uphill and risky battle. This is especially the case when an action is brought against politicians occupying government office and protected by parliamentary immunity. For instance, Salvini recently shielded himself with his parliamentary privilege to avoid charges for defaming *Carola Rackete* (ANSA 2023).

Our findings have both theoretical and policy-relevant implications. From a theoretical standpoint, the repression of sea rescue CSOs in the Mediterranean Sea highlights the pervasiveness of strategic adaptation and policy-learning dynamics across both governmental actors and CSOs. Contentious forms of solidarity worldwide should therefore be studied as a dynamic, relational, and rapidly

evolving process. The case of Italy suggests that subtler forms of repression, like administrative sanctions and practical restrictions, are ultimately more effective at curbing solidarity than reliance on the instruments of criminal law. While more comparative research is needed to generalize this finding, evidence from very different cases lends support for our argument. In the U.S., for example, criminal trials have triggered backlash against the government, rallied support for CSOs, and rarely led to convictions due to courts' tendency to waive charges on humanitarian grounds. The U.S. activist Scott Warren—who had been indicted for assisting people on the move at the U.S.–Mexico Border through his No More Deaths advocacy group—was eventually acquitted after a contentious trial. By contrast, extrajudicial forms of repression, like intimidation, logistical obstacles, and administrative sanctions, proved more viable and ultimately more effective in the U.S. desert, too. In this vein, the CSOs distributing food and water on the trails used by people on the move—like Warren's No More Deaths—have been repeatedly barred from using local roads and have received administrative sanctions for littering in protected natural areas (Devereaux 2019).

As for policy implications, the government's increasing efforts to restrain solidarity at sea shows that civil society actors need to adapt rapidly to the changing policy environment. Strategies such as using counternarratives and mutual assistance, forging alliances with sympathetic state actors, reflagging and changing ships, and engaging in legal mobilization have allowed several CSOs to safeguard their presence in a shrinking humanitarian space. As such, despite the obvious differences in legal and geographical environments, the struggle for solidarity toward people on the move in distress in the Mediterranean Sea provides valuable lessons for the civil society organizations operating along other maritime and land borders as well. At the same time, however, the fact that government actors' repressive strategies are also adaptive and strategic poses new challenges for CSOs.

These dynamics have a powerful impact on what happens along the Central Mediterranean migration route and on maritime routes to Europe more broadly. On one hand, the repression of sea rescue activities endangers the lives of people on the move and jeopardizes the right to asylum. On the other hand, CSOs' capacity to adapt, learn, and deploy a variety of practices of resistance has enabled them to continue saving lives and to expose cases of state-led human rights violations.

Notes

1. Interview 3 with a sea rescue activist based in Spain, conducted online, January 26, 2022.

2. According to international law, all those in distress at sea should be disembarked in a place of safety where they can receive medical care and have the opportunity to safely apply for asylum. The assignment of a port of disembarkation by the Maritime Rescue Coordination Centre in charge is therefore the last phase of any maritime rescue operation.

3. Salvini designed the first two decrees (Decree-Law n. 213/18, converted into Law n. 32/2018 and Decree-Law n. 53/2019, converted into Law n. 77/2019), while the last two were proposed by Lamorgese (Decree-Law n. 130/20, converted into Law n. 173/2020) and Piantadosi (Decree-Law n. 1/23, converted into Law n. 15/2023), respectively.

4. For more on the parliamentary debates on Lamorgese's decree, see Chamber of Deputies, XVIII Legislature, Session n. 434, 27 November 2020, and Session n. 440, 9 December 2020; and Senate of the Republic, XVIII Legislature, Session n. 284, 17 December 2020, and Session n. 285, 18 December 2020. (Transcriptions of the Chamber sessions are available at www.camera.it; transcriptions of the Senate sessions are available at www.senato.it.)

5. Senate of the Republic, XVIII Legislature, Session n. 228, 11 June 2020.

6. With the partial overlap of Piantedosi's administrative seizures, which are administrative acts, but based on the provisions contained in a decree-law.

7. In fact, continuity in Italian migration policy is far from new, especially when informed by a repressive approach to solidarity (Alagna and Cusumano 2023; Strazzari and Grandi 2019; Zotti and Fassi 2020).

8. Interview 1 with a sea rescue activist based in Italy, conducted online, May 22, 2019.

9. Besides public speeches and declaration, this argument was also officially made during parliamentary debates (see Chamber of Deputies, XVII Legislature, Session n. 779, 12 April 2017).

10. Interview 4 with a sea rescue activist based in Spain, conducted online, January 27, 2022; and Interview 5 with a sea rescue activist based in Italy, conducted online, 17 February 2022.

11. Interview 6 with a sea rescue activist based in Italy, conducted online, March 31, 2022.

12. Interview 3 with a sea rescue activist based in Spain, conducted online, January 26, 2022.

13. Interviews 2, 3, 4, 6 (see other notes).

14. Interview 6 with a sea rescue activist based in Italy, conducted online, March 31, 2022.

15. Interview 4 with a sea rescue activist based in Spain, conducted online, January 27, 2022.

16. Interview 4 with a sea rescue activist based in Spain, conducted online, January 27, 2022.

17. Interview 3 with a sea rescue activist based in Spain, conducted online, January 26, 2022.

18. Interview 2 with a researcher, conducted online, February 16, 2022.

19. Interview 6 with a sea rescue activist based in Italy, conducted online, March 31, 2022.

20. Interview 1 with a sea rescue activist based in Italy, conducted online, May 22, 2019.

21. For example, in March 2024, just a few months after the specific time frame considered in this article, the civil courts of Brindisi and Crotona suspended the impoundments (based on Decree-Law n. 1/23) of two sea rescue ships, following the appeals filed by SOS Méditerranée and SOS Humanity (Merli 2024).

22. Interview 6 with a sea rescue activist based in Italy, conducted online, March 31, 2022.

References

- Alagna, Federico. 2024. The continuation of criminalization by other means: The role of judicial agency in the Italian policing of humanitarian assistance at sea. *Mediterranean Politics* 29(2): 235–259.
- Alagna, Federico, and Eugenio Cusumano. 2023. Varieties of criminalization: Italy's evolving approach to policing sea rescue NGOs. *Contemporary Italian Politics* 15(4): 494–503.
- Allsopp, Jennifer, Lina Vosyliūtė, and Stephanie Brenda Smialowski. 2021. Picking “low-hanging fruit” while the orchard burns: The costs of policing humanitarian actors in Italy and Greece as a strategy to prevent migrant smuggling. *European Journal on Criminal Policy and Research* 27: 65–88.
- ANSA. 28 February 2023. Immunity panel denies Salvini Rackete case. ANSA. Available from www.ansa.it.
- Associated Press in Rome. 17 April 2021. Matteo Salvini to face trial over standoff with migrant rescue ship. *The Guardian*.
- Associazione per gli Studi Giuridici sull'Immigrazione. 9 January 2019a. ASGI: Illegittimo negare l'attracco in un porto sicuro. Available from www.asgi.it.
- Associazione per gli Studi Giuridici sull'Immigrazione. 10 January 2019b. Accesso civico ai Ministeri dell'interno e dei Trasporti: nessun provvedimento formale di chiusura dei porti. Available from www.asgi.it.
- Barcelona al día. 11 February 2019. Barcelona pide en Roma que se levante el bloqueo administrativo al barco de Open Arms. *Barcelona al día*. Available from www.barcelonaaldia.com.
- Barone, Luca Tancredi. 20 March 2018. Ada Colau: “Barcellona sostiene Open Arms, salvare vite non è reato.” *il manifesto*. Available from ilmanifesto.it.

- Camilli, Annalisa. 22 April 2017. Perché le ong che salvano vite nel Mediterraneo sono sotto attacco. *Internazionale*. Available from www.internazionale.it.
- Candito, Alessia. 7 February 2023. Migranti, inizia la battaglia legale sul decreto Piantedosi: Medici senza frontiere fa ricorso contro la politica dei porti lontani. *La Repubblica*. Available from palermo.repubblica.it.
- Carrera, Sergio, Jennifer Allsopp, and Lina Vosyliūtė. 2018. Policing the mobility society: The effects of EU-anti-migrant smuggling policies on humanitarianism. *International Journal of Migration and Border Studies* 4(3): 236–276.
- City of Paris. 21 January 2021. Des collectivités solidaires s'engagent avec SOS Méditerranée. Available from www.paris.fr.
- Consiglio Italiano per i Rifugiati. 7 October 2020. Modifiche ai Decreti Sicurezza: Luci e ombre di un intervento importante. Rome: CIR [Italian Refugee Council]. Available from www.cir-onlus.org.
- Court of Justice of the European Union. 2022. Judgment of the Court (Grand Chamber) of 1 August 2022: *Sea Watch eV v. Ministero delle Infrastrutture e dei Trasporti and Others*. Joined Cases C-14/21 and C-15/21. Available from eur-lex.europa.eu.
- Cusumano, Eugenio. 2021. United to rescue? Humanitarian role conceptions and NGO–NGO interactions in the Mediterranean Sea. *European Security* 30(4): 547–568.
- Cusumano, Eugenio, and Flora Bell. 2021. Guilt by association? The criminalisation of sea rescue NGOs in Italian media. *Journal of Ethnic and Migration Studies* 47(19): 4285–4307.
- Cusumano, Eugenio, and Matteo Villa. 2021. From “angels” to “vice smugglers”: The criminalization of sea rescue NGOs in Italy. *European Journal on Criminal Policy and Research* 27: 23–40.
- della Porta, Donatella. 2013. Political opportunity/political opportunity structure. In *The Wiley-Blackwell encyclopedia of social and political movements*, eds. David A. Snow, Donatella della Porta, Bert Klandermans, and Douglas McAdam, 1st ed., 1–6. Hoboken, NJ: Wiley-Blackwell.
- Devereaux, Ryan. 23 November 2019. Humanitarian volunteer Scott Warren reflects on the borderlands and two years of government persecution. *The Intercept*.
- European Court of Human Rights. 2012. Judgment 23.2.2012. *Hirsi Jamaa and Others v. Italy* [GC] - 27765/09. Available from hudoc.echr.coe.int.
- European Parliament. 2018. European Parliament resolution of 5 July 2018 on guidelines for member states to prevent humanitarian assistance from being criminalised (2018/2769(RSP)). Available from www.europarl.europa.eu.
- European Parliament. 2023. European Parliament resolution of 13 July 2023 on the need for EU action on search and rescue in the Mediterranean (2023/2787(RSP)). Available from www.europarl.europa.eu.
- European Union Agency for Fundamental Rights. 20 June 2022. June 2022 update – Search and rescue (SAR) operations in the Mediterranean and fundamental rights. Vienna: Fundamental Rights Agency. Available from fra.europa.eu.
- Fekete, Elizabeth. 2018. *Europe's fault lines: Racism and the rise of the right*. London: Verso Books.
- From the Sea to the City. 2021a. *Ideas, good practices and next steps for a welcoming Europe*. Barcelona: From the Sea to the City Consortium. Available from fromseacity.eu.
- From the Sea to the City. 10 June 2021b. From the sea to the city – A conference of cities for a welcoming Europe: 25–26 June 2021. Available from fromseacity.eu/press.
- Hauswedell, Charlotte. 15 August 2019. Judge overrules Salvini, giving Open Arms green light to enter Italian waters. *InfoMigrants*. Available from www.infomigrants.net.
- Heller, Charles, and Lorenzo Pezzani. 2017. *Blaming the rescuers: Criminalizing solidarity, re-inforcing deterrence*. London: Forensic Architecture at Goldsmiths, University of London. Available from content.forensic-architecture.org.
- International Alliance of Safe Harbours. 2021. Declaration of mayors, June. Palermo: International Alliance of Safe Harbours. Available from staedte-sicherer-haefen.de.
- International Organization for Migration. n.d. Missing Migrants Project. Available from <https://missingmigrants.iom.int/region/mediterranean>.
- Masera, Luca. 2023. Il D.L. Piantedosi sulle operazioni di soccorso in mare: L'ennesimo tentativo di impedire ciò che il diritto internazionale impone e il problema della depenalizzazione come fuga dalla giurisdizione. *Sistema Penale* 2: 83–106.

- Matteini, Charlotte. 21 June 2018. Migranti, Matteo Salvini contro la Ong Lifeline: “Nave pirata, la facciamo sbarcare in Italia e arrestiamo tutti.” *Fanpage.it*. Available from www.fanpage.it.
- Mayring, Philipp. 2000. Qualitative content analysis. *Forum: Qualitative Social Research* 1(2).
- Médecins Sans Frontières. 10 November 2017. Codice di condotta: La lettera di MSF al Ministro dell'Interno. Available from www.medicisenzafrontiere.it.
- Merli, Giansandro. 3 November 2021. Navi Ong, stop a quarantene e fermi amministrativi. *il manifesto*. Available from ilmanifesto.it.
- Merli, Giansandro. 14 February 2023. “Sbarchi selettivi,” per il tribunale di Catania il decreto è illegittimo. *il manifesto*. Available from ilmanifesto.it.
- Merli, Giansandro. 19 March 2024. Due su due. Sospeso il fermo della Humanity 1. *il manifesto*. Available from ilmanifesto.it.
- Ministero dell'interno. 31 July 2017a. Codice di condotta per le Ong, terzo incontro al Viminale. Available from www.interno.gov.it.
- Ministero dell'interno. 7 August 2017b. Codice di condotta per le ONG impegnate nelle operazioni di salvataggio dei migranti in mare. Available from www.interno.gov.it.
- Ministro dell'interno. 18 March 2019a. Direttiva per il coordinamento unificato dell'attività di sorveglianza delle frontiere marittime e per il contrasto all'immigrazione illegale ex articolo 11 del d.lgs. n. 286/1998 recante il Testo Unico in materia di Immigrazione, N.14100/141(8). Available from www.interno.gov.it.
- Ministro dell'interno. 4 April 2019b. Intervento dell'assetto “Alan Kurdi” (ONG Sea Eye) iniziato in 3 aprile 2019, N.14100/141(8). Available from www.interno.gov.it.
- Ministro dell'interno. 15 April 2019c. [Minister directive on the Mare Jonio case]. Available from www.interno.gov.it.
- Ministro dell'interno. 15 May 2019d. Intervento di Sea Watch 3 del 15 maggio 2019 in area SAR libica, N.14100/141(8). Available from www.interno.gov.it.
- Ministro dell'interno. 4 November 2022. [Interministerial Decree]. Available from sos-humanity.org.
- Otero, Fran. 14 February 2019. Open Arms recibe el apoyo del Papa: “Sigan, no paren.” *Alfa y Omega*. Available from alfayomega.es.
- Regional Administrative Court of Lazio. 14 August 2019. Decreto sul ricorso numero di registro generale 10780 del 2019, proposto da Fundacion Proa (Pro - Activa Open Arms), N. 05479/2019 REG.PROV. CAU.
- Scharpf, Fritz W. 1997. *Games real actors play. Actor-centered institutionalism in policy research*. Boulder, CO: Westview.
- Sea-Watch. 24 December 2020. Sea-Watch case referred to the European Court of Justice. Berlin: Sea-Watch. Available from sea-watch.org.
- Strazzari, Francesco, and Mattia Grandi. 2019. Government policy and the migrant crisis in the Mediterranean and African arenas. *Contemporary Italian Politics* 11(3): 336–354.
- Watch the Med – Alarmphone. 17 June 2018a. Toward a coalition of solidarity – For the right to mobility and equal rights for all. Berlin: Watch the Med. Available from alarmphone.org.
- Watch the Med – Alarmphone. 17 June 2018b. Call for safe and open harbours! Berlin: Watch the Med. Available from alarmphone.org.
- Watch the Med – Alarmphone. 29 November 2019. Fourth meeting of the Palermo Charter Platform Process in Bologna, 28–29 November 2019. Berlin: Watch the Med. Available from alarmphone.org.
- Wintour, Patrick, Lorenzo Tondo, and Stephanie Kirchaessner. 11 June 2018. Southern mayors defy Italian coalition to offer safe port to migrants. *The Guardian*.
- Zaun, Natascha, and Olivia Nantermoz. 2022. The use of pseudo-causal narratives in EU policies: The case of the European Union Emergency Trust Fund for Africa. *Journal of European Public Policy* 29(4): 510–529.
- Ziniti, Alessandra. 9 July 2020. Ispezioni a bordo e fermo amministrativo. Così il governo stoppa le Ong. *La Repubblica*. Available from www.repubblica.it.
- Ziniti, Alessandra. 18 December 2022. Piantedosi: Basta soccorsi multipli. Un porto solo a chi lo chiede subito. *La Repubblica*. Available from www.repubblica.it.
- Zotti, Antonio, and Enrico Fassi. 2020. Immigration and foreign policy: Italy's domestic-international linkage in the management of mass human movements. *Italian Political Science* 15(1): 96–113.

