

Introductory Essay

The Body and Soul of Integration

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If managed well, immigration is one area where our citizens will clearly see the added value of a European approach. Such an approach should help the EU to address, and to a certain extent reduce, unwanted phenomena such as unregulated migration and trafficking in human beings, while ensuring that Europe can welcome the migrants its economy needs and its society is capable and willing to receive.

– Franco Frattini, European Minister for Justice, Freedom and Security, 2007

1. Ever closer assemblage? The politics of Integration in Europe

The term integration, as applied to immigration and often fraught questions of social cohesion in Europe, does not have a long history. Specialists on European policy have dated the use of ‘integration’ to the 1974 Commission *Action Plan in Favour of Migrant Workers and their Families*. The Action Plan was composed of a set of proposals to improve basic living and working conditions but did not challenge the rights of Member States to manage their own social cohesion agendas. Later, the 1977 *Council Directive on Education of the Children of Migrant Workers* sought to place responsibility on Member States for the free education of children of migrant workers in host language(s), their mother tongue and native ‘culture,’ and for the training of special teachers in this area. Several Member States, including Ireland, simply ignored this directive.¹ However, following the first Schengen border control agreement in 1985 integration took on a more tangible form. Initially, Schengen secured the free movement of residents of France, Germany and the Benelux Economic Union across internal borders, but the vanishing of those internal borders was predicated by the securitization of the Schengen area’s external borders. A variety of commentators argue that it is at this moment that we can observe the birth of ‘Fortress Europe’; the progressive securitization of immigration, and the moment in which migration and integration become specific problematizations of security (see Bigo 1994; Huysmans 2006).

These early moments were ones during which the sovereign power of Member States was at stake, and in 1985 the extent to which Brussels had the power to regulate the migration policies of Member States was challenged and effectively curtailed in a European Court of Justice ruling. But the genie was out of the bottle. First in the

¹ Children with barely a few words of English were being put in classrooms with no special provision and asked to ‘sink or swim’. They would have to acquire another language by osmosis and along the way some were expected to pick up a few words *as Gaeilge* (see Maguire 2004).

Maastricht Treaty in 1992 and then in the 1997 *Treaty of Amsterdam* integration policy became a European issue by virtue of the fact that migration and border control must now be framed at that level. The intention of the *Treaty of Amsterdam* was to strengthen economic and social cohesion, establish a common foreign and security policy and, ‘an area of freedom, security and justice, in which the free movement of persons is assured in conjunction with appropriate measures with respect to external border controls, asylum, immigration and the prevention and combating of crime’ (EU 1997: 5).² Of course, Ireland and the United Kingdom do not fully participate in the Schengen Agreement and they therefore represent somewhat different trajectories within the broader history of EU policies. Since 1923, the UK and Ireland share a Common Travel Area (CTA) and their migration policies move in lock-step (see Ryan 2001). This synchronicity has been shown time and again. For example, the *British Commonwealth Immigrants Act, 1962* was followed by the *Irish Aliens (Amendment) Order, 1962*, and, more recently, when in 1999 the UK requested an opt-in for the policing and judicial cooperation aspects of the Schengen *acquis*, or body of law, Ireland made a corresponding request in 2000. This type of case-by-case optionality is provided for in the *Treaty of Amsterdam*. However, the long-term persistence of the CTA is unlikely and it is therefore important to further consider the deepening connections between security, immigration and integration at EU level.

When one looks back over developments in the 1980s and 1990s one can see the progressive instantiation of systems, institutions and policies that clearly hold migration, integration and security together. During the Tampere Council in 1999 there was a general concern to articulate a EU-wide policy on integration, though the tension between the rights of Member States *vis-à-vis* migration policy and the emergent trend towards ‘uploading’ to the EU was still evident. Despite these tensions, during the years following Tampere a broad framework began to emerge, especially through the EU Commission (see European Commission 2000). This framework explicitly brought together the areas of immigration and social cohesion. While the link with security was not in direct focus it nonetheless remained a powerful presence.³ However, following the terrorist attacks on September 11th, 2001 it was security that took centre stage. From that point onwards, migration (understood to share a field with crime and terrorism) and integration (understood to share a field with cohesion, ‘basic values’, inviolable rights and national laws) were to be framed more and more as matters of security.

The 2004 Hague Program saw the EU twenty five set out an ambitious plan to strengthen fundamental rights and protect refugees, but it was also a plan that

² A Treaty of Amsterdam protocol brought the Schengen Agreement into the EU framework, and the Schengen *acquis*, or body of law, is now in the legal and institutional framework of the EU. This provides for, *inter alia*, police, surveillance, judicial cooperation and the Schengen Information System (SIS).

³ Under a section titled, ‘Management of migration flows’ the Tampere Council conclusions included a focus on illegal migration and calls for cooperation with countries of origin and transit. Indeed, the degree to which migration is criminalized, or, perhaps more appropriately, securitized, is striking. The Council, for example, welcomed the maritime surveillance and capture agreement between Italy and Greece as a great step towards cooperation in combating ‘organised crime, smuggling and trafficking of persons’ (Tampere 1999). But the most salient aspect of this section is the call for further and deeper harmonization of security in terms of systems, technologies, institutions and documentation.

packaged international crime and terrorism together with international migration.⁴ Indeed, understanding the eleven ‘Common Basic Principles’ for integration set out at the first EU Ministerial Conference on Integration in 2004 may be enhanced by simply attending to the language used: the Justice and Home Affairs press release begins by discussing ‘the effective *management* of migration’ (European Council 2004 [*our emphasis*]). Whilst the common principles ostensibly aim to balance tolerance of diversity and cohesion in Europe, tolerance, as Wendy Brown writes, is a ‘productive force – one that fashions, regulates, and positions subjects, citizens and states as well as one that legitimates certain kinds of actions’ (2006: 10). Thus this balancing act reveals a fallacious underpinning: because cohesion denotes ‘basic values’, inviolable rights and national laws it cannot be balanced with anything; rather, cohesion ‘sets the boundaries’ for tolerance. Moreover, it is unwise to take these principles and their boundaries in isolation. For example, the 2007 EU Commission communication on Member States’ integration policies stresses the ‘complementary linkage’ between integration and immigration (European Council 2007: 23).

Furthermore, integration in the 2007 communication is but a single dimension in a broader agenda that provides powerful insights into the emerging European security field. The communication describes activities at a number of scales and indexes the extant linkages between Member States in cross-border policing, such as the automated transfer of DNA profiles, dactyloscopic data, and vehicle registration data. The communication also describes the ongoing development of the Visa Information System (VIS) behind which is the European database of alphanumeric and biometric data – and, illustratively framed, ‘the VIS will allow a major advance in protecting against international terrorism and organised crime in particular’ (European Council 2007: 15). As Guild, Groenendijk and Carrera (2009) have recently illustrated, a securitized modality of integration now extends from such technologies as the privatised ‘pre-migration’ integration test pioneered by the Netherlands to increasingly complex and gradated stratifications of residence and entitlement. Integration is now more likely to function as a multi-layered strategy of population governance than as a stage in providing access to national citizenship through naturalisation. Integration, in other words, must be understood as a border practice, beyond and inside the territorial border:

In the context of immigration law, integration becomes a tool to control the non-national ‘inside’ the nation-state and even ‘abroad’... Integration functions as another regulatory technique for the state to manage access by the non-national – not to the status of citizen – but to the act of entry, the security of residence, family reunification and protection against expulsion... Integration determines the ‘legality’ or ‘illegality’ of human mobility, and constitutes another frontier to being considered as a ‘legal immigrant’ (2009: 16)

⁴ In a revealing paragraph of a 2005 Communication to the Council and the European Parliament on the priorities in migration management, external security and integration are treated as separate but related arenas of emerging policy and EU infrastructure: ‘The Hague Programme [...] provides an ambitious set of measures and commitments [*including*] the establishment of the European Agency for the management of operational cooperation at the External Borders (FRONTEX) [*; furthermore*] the Commission adopted a package of initiatives that deal with various important dimensions of migration, including integration, the linkages between migration and development and return. (Commission 2005: 621, [*our annotations*]).

Thus while integration is frequently presented politically as a processual vision, seeking a balance between diversity and ‘social cohesion’, analytically it must be approached through a discussion of those arenas which have a ‘complementary linkage’. To study immigration in Europe these days involves research frames that are porous well beyond the methodological nationalism of old. Immigration is configured in Europe as a complex field with many types of actors, from legal to ‘illegal’, from ‘high value’ to low skilled to the human waste of Zygmunt Bauman’s haunting characterisation (2003). The trajectory of integration governance - extending, in theory, from a pricey automated phone test at ‘home’ to years of status-dependent tests, regulations and restrictions in the migration location – seeks to sort and manage subjects according to intersecting visions of labour market value, personal autonomy, cultural compatibility, and the socio-economic footprint of familial networks. It follows that immigration is also configured as something that does not begin and end at the border: from so-called good neighbourhood policies with North African countries to new technologies for visa processing, the borders are no longer where the map indicates. Muammar Gaddafi may have embarrassed the EU⁵ by publicly naming a price for intercepting an ‘influx of starving and ignorant Africans’ – and in so doing, also explicitly echoing what Goldberg (2009) terms the ‘fear of a black planet’ - but it is within this field that new security specialists, agencies and ‘experts’ do their work. The politics of integration is now less a question of individual nation-states controlling migration into their territories and reconciling diversity and cohesion therein, but, rather, a broader assemblage composed of different discrete assemblages – integration, migration, security, post-racial hierarchies, strategies for growth and investment – which are themselves understood as multiple.⁶

There is nothing especially new or particularly European about this assemblage of seemingly heterogeneous elements. Take for example John F. Kennedy’s famous 1957 speech to the Anti-Defamation League, posthumously published as *A Nation of Immigrants* in 1964. President Kennedy included a 1946 cartoon by Herblock depicting Americans debating migration policy and national identity while in the background the Statue of Liberty stands with a hand outstretched in refusal, her head drawn haughtily back so as to better peer at immigrants through her opera glasses (see Kennedy 2008: 12-13, figures). President Kennedy was well aware that while Liberty Enlightening the World is inscribed with a welcome to the world’s huddled masses, the United States has always been selective as to which masses it admits (see Zolberg 2006: 2, 24-58). He was especially concerned about the racial politics that obtained

⁵ See Gaddafi wants EU cash to stop African migrants’ BBC News online 31 August 2010 <http://www.bbc.co.uk/news/world-europe-11139345>

⁶ We use the suggestive concept of *assemblage* throughout this introductory essay. The current use of the term in critical social theory draws from Deleuze and Guattari’s *A Thousand Plateaus* (2004). Paul Patton explains their deployment of the term as an effort to understand the relationships between a, ‘multiplicity of heterogeneous objects, whose unity comes solely from the fact that these items function together, that they “work” together as a functional entity’. Also, ‘any particular assemblage is itself composed of different discrete assemblages which are themselves multiple’ (Patton 1994: 158). Deleuze and Guattari propose that desire forms a ‘field of immanence’, an always-active and positive force. And, whereas the ‘the state’ implies the striation of space (the separation, division and capture of flows), an assemblage, in contrast, merely fixes a flow in a temporary fashion. An assemblage is thus spatial and temporal. By adopting the term assemblage, here we wish to understand security, migration and integration as a part of a multiple, unstable and de-(re)territorialized form. The crucial insight to be gained from adopting the term assemblage is that contemporary shifts in integration or security policy cannot be challenged by simply attacking one clearly bounded policy domain or ‘the state’ as a fixed form.

behind the immigration quota system and was mindful of the disjuncture between myths of ethnic assimilation (often encapsulated in tropes such as the ‘melting pot’) and the lived realities of racism, especially ‘in the case of the Negro’ (Kennedy 2008: 35). Immigration, security, so-called assimilation, and ideals of upward social mobility, needed to be spoken of together – an assemblage composed of different, multiple assemblages.

The contemporary ways in which ‘integration’ and security are assembled in North America are described by Elaine Dezenski of the US Department of Homeland Security. ‘About 100 years ago,’ she tells us, so-called Americanization ‘sought to promote civic literacy, English language acquisition, and cultural assimilation’. In contrast, today, she tells us, ‘We believe, that, despite differences in background, all Americans are bound together by a set of enduring civic principles as relevant today as they were the day our Constitution’ (Dezenski 2006: passim). This contemporary articulation of diversity and societal cohesion rests not just on a putative abandonment of national assimilation in favour of common basic values but also on the securitization of migration and the reshaping of borders, border powers and border technologies (most recently evidenced in the state of Arizona’s Senate Bill 1070⁷). Dezenski’s comments were made in the context of a presentation on the role of new security technologies and processes in managing ‘the secure and efficient movement of legitimate and low-risk traffic across our shared borders through [...] facilitating travel, enforcing immigration laws, and identifying the bad guys’ (Dezenski 2006: passim).

Jonathan Xavier Inda (2006) writes about the current configuration of the US-Mexico border, from the militarized approach adopted during the Clinton-era Operation Gatekeeper to the ever-expanding use of surveillance and biometric technologies. Inda is concerned to show the linkages between the political mentalities that construct the poor, the ‘criminal aliens’ and the ‘natives’ as objects, but he is also concerned to unpick the ways in which problematizations emerge alongside actual interventions and technologies of governing. It is often at the level of those technical solutions used to render populations visible, calculable and knowable that acute insights into the contemporary moment can be gained. These seemingly mundane forms of governing – bureaucratic rules, statistical data, and frontline technologies such as biometrics – are key sites for investigation, the material inscriptions of governing, to borrow a label from Bruno Latour (1986). Inda’s conclusion is that we are witnessing the violent growth of technologies of citizenship, on one side, which increasingly individuate and render as technical linkages with government, and, on the other side, anti-citizen technologies that operate at the level of the body and function to keep the poor out of the United States. This securitization process has a necessary connection to societal debates about integration and citizenship. The ongoing public debates in the United States about undocumented immigrants’ rights and new graduated forms of citizenship are coterminous with a process of securitization that operates at the borders and simultaneously across society. Whereas once migration studies specialists could wring their hands over populations who were *in America* physically but not of *America* in the sense of cultural integration, now there is greater attention to the ways in which securitization is creating the gated worlds described by Susan Bibler Coutin:

⁷ See Archibold, R. ‘Arizona enacts stringent law on immigration, The New York Times April 23 2010. <http://www.nytimes.com/2010/04/24/us/politics/24immig.html>

Unauthorized migrants are absented physically by being detained or deported, and socially by being denied particular rights and services. [...] Of course, absencing is often partial in that, alongside those who are legally present, unauthorized migrants travel, work, take up residence, shop, and so forth. There is, therefore, a sense in which the ‘underground,’ occupied by the unauthorized, is a dimension of social reality rather than a separate place. [...] Legal vulnerability makes unauthorized migrants a source of cheap labour, illicit economies grow up around prohibited practices, and countries such as El Salvador depend on the remittances that migrant workers send home to family members. (Coutin 2005: 196)

In some senses then, in Europe and America and in other parts of the world, a complex picture of integration is emerging. This picture shows integration to be a term that is imbricated in economic, societal and governmental processes that are both broad and deep. The study of integration cannot be framed as something amenable to simple ‘common indicators and indexes’ within each nation-state. Rather integration is an assemblage that holds together contemporary articulations of the need for ‘core values’, social capital, tolerance, and the management of diversity with a border assemblage that includes immigration and security. Nor, for all this focus on governmentality, is it restricted to the operations of state power. Commenting on the increased fusion of integration and economic chauvinism with questions of security, Didier Fassin has argued that since 9/11 the menace of immigration has been coded more insistently in civilizational terms: ‘Although difficult to name, as it is masked by cultural or religious, sometimes ethnic description, it can be characterized more bluntly as a racial security: it has to do with the protection of a European, Christian and white civilization against Third World, Muslim or black populations’ (2005: xx). Crucially, the articulation of inchoate and coded desires for racial security is not the preserve of the traditional far-right, nor ‘populist’ political parties. Recent work on *homonationalism* (Puar 2007) and ‘Schmittian liberalism’ (Triadafilopoulos 2011), for example, examines the assemblage of anti-migrant politics within civil society movements and putatively progressive political rubrics. Of note here, for example, is the ‘save our gays’ meme within gay rights advocacy, and the promulgation of illiberal means to liberal ends through compulsory integration processes and exclusionary migration policies.

By approaching integration as a assemblage, therefore, we can begin to approach debates around the world as not merely nation-state models of integration but, rather, as particular articulations of a widespread problematization of immigration, security, and integration. We turn now to explore how integration is debated in Ireland and aim to tease out some of the ways in which it is being framed.

2. Ireland’s two-way process: the violence in the gift

The term integration, as applied to immigration and social cohesion, has a very short history in Ireland. The first truly significant policy publication on this issue is the interdepartmental report *Integration: a Two-Way Process* (2003), which describes,

[...] a two way process that places a real obligation on both society and the individual refugee. From the refugee’s perspective, integration requires a willingness to adapt to the lifestyle of Irish society without abandoning or

being expected to abandon one's own cultural identity. From the point of view of Irish society, it requires a willingness to accept refugees on the basis of equality and to take action to facilitate access to services, resources, and decision-making processes in parity with Irish nationals [...]. (Interdepartmental Working Group 2003: 42)

There is no conflation of asylum seeker and refugee here. The policy statement speaks of the refugee (read genuine) and not of the asylum seeker because the latter are not included in integration policy. Similarly, the more recent Ministerial statement on integration, *Migration Nation* makes only one clear reference to the relationship between integration policy and asylum seekers: the need for a more 'streamlined asylum process' (2008: 9). A variety of commentators have sought to unpack Ireland's policy statements on integration, and it is in part due to the directions and questions raised by their work that this special issue has been developed (e.g. Gray 2006; Fanning 2007; Boucher 2008). At the risk of being overly generalizing, these commentators are in broad agreement that Irish integration policy is a thin *laissez-faire* strategy aiming to cultivate and mediate tolerable forms of diversity. At the same time, it gathers an index of governmental strategies to stratify and divide migrants in a layer-cake model that runs from full exclusion to full citizenship, and that, as Gray argues, is interested in a particularly neoliberal form of action on the conduct of 'autonomous' subjects. Speaking of the definition of integration in migration policy, Bryan Fanning thus concludes: 'In essence this definition has two components. The first relates to the rights and resources needed to participate fully in society. The second concerns forms of racism which justify discrimination and inequality' (2007: 248; see also Boucher 2008). Here Fanning is noting the Janus-faced approach apparent in integration policy and drawing attention to the realities of racism, all too often muted in public discussions. Ronit Lentin and Robbie McVeigh cast the situation in forceful terms:

Amid all our celebrations of diversity and integration and multiracialism and multiculturalism and interculturalism, *Irish racism has intensified exponentially*. [...] Increasingly, both multiculturalism and interculturalism are abandoned as 'integration' becomes the watchword for managing racism in the 21st century. The problem of racism is both displaced and denied – now the real problem is located within the qualities of those minorities that need to be 'integrated'. [...] Anyway, who could argue against the principle of 'integration'? (2006: 165-166)

Lentin and McVeigh's critique of racialization as a process that connects the gatedness of the state to its internal 'integration' agenda is important, and herein our aim is to tease out these connections and consider them in a ways that attends to the key role of racialization while also examining other processes. We note, for example, that the connections between security, immigration and integration are openly spoken of in political discourse. Following Boucher (2008), it is worth recalling the address made by former Tánaiste and former Minister for Justice, Equality and Law Reform, Michael McDowell, TD, at the 2007 conference, *Integration Policy – strategies for a cohesive society* where he acknowledged, '[T]he critical links between the immigration, visa, asylum and integration areas,' with the result that changes 'to our immigration laws are changes to the integration landscape' (2007: no pagination). His statements on 'integration management' may at first glance appear thin and sweeping,

but once again it is the complementary linkages, the assemblage of different elements, that we must attend to. And these linkages are often forcefully noted by government officials: responding to a question on integration posed by an *Irish Times* journalist, one exasperated official remarked, ‘Integration can’t happen without deportation!’ (MacCormaic 2009). We are arguing here for the importance of attending to an assemblage that includes securitization, immigration and integration, and for an exploration of modes of racialization that, following Fassin, draw on a repertoire of intersections between culture, religion, ‘race’, region, class, ‘contribution’, poverty and ‘compatibility’. It therefore follows that while specific integration policies require critical engagement, an adequate research frame must also treat policy and legislation on security and immigration as sites in which integration emerges.

The most recent site of this kind is the current legislation on immigration and residency. The *Immigration, Residence and Protection Bill, 2008*, first appeared as an attempt to clarify and support of the Government of Ireland’s capacity to regulate the presence, movement and deportation of foreign nationals. However, yet again, it recalls the synchronicity of the UK and Ireland required by participation in the Common Travel Area, specifically with the *UK Border, Citizenship and Immigration Act, 2009*. Both instruments were intended to progress away from the CTA towards greater harmonization with the Schengen *acquis*. The UK always insisted on the maintenance of the CTA as a means by which to retain control over its borders, however, the extraordinary pace of Schengen securitization and the exponential growth of new technologies have rendered EU competence in this area much more palatable to the British state. In the Republic, the first iteration of the immigration and residency legislation was poorly framed and subject to hundreds of amendments. In particular, NGOs working with migrants expressed alarm over the failure to set out clear rules regarding the rights and obligations of people migrating to Ireland. This lack of clarity, many advocacy groups contended, gave extraordinary power to the offices of the Minister for Justice, and much regulation would likely be in the form of statutory instruments beyond full public scrutiny. Others worried about Section 108 of the Bill, which set out provisions for biometric data. The proposed legislation compelled foreign nationals to provide such data to an immigration officer or the police and it was to be an offence to refuse. Biometric security was also to involve the development of a register of foreign nationals in line with broader EU systems. The concerns expressed by NGOs included lack of public debate and reservations about issues of privacy and methods of data collecting. The then Minister for Justice, Brian Lenihan explained:

The business of managing migration to the State is about making choices. It cannot be the case that we say to everyone who wants to migrate here: “Come on in.” I owe a duty to Irish society [...] to continue to ensure to the greatest extent possible that Ireland is a safe place to live, with an economy that continues to thrive, and that it is not used as a base for criminality. In the immigration context, I fulfil that duty by making choices about which foreign nationals can come in, which ones can stay and, ultimately, which ones must leave. (Lenihan 2008: no pagination)

Here, the former Minister performs a one-man version of *Roi Soleil*, a speech-act event that produces ‘the state’ personified as the speaker: *L’État c’est Moi!*’ (see Buzan and Wæver 2003; cf. Butler 1997). And, when the Bill reappeared in 2010 the

same performance was re-enacted by his successor. According to Minister Dermot Ahern, ‘the State has not only the power (a power exercised mainly by the Minister for Justice and Law Reform) to manage the entry into, presence in and removal from the State of non-nationals, but has a duty to do so in protection of the interests of Irish society and, indeed, the integrity of the State’s immigration processes’ (Ahern 2010: no pagination). Both Ministers’ scripts refer directly or indirectly to the jurisprudential authority of a 1986 Supreme Court ruling:

[I]t is in the interests of the common good of a State that it should have control of the entry of aliens, their departure and their activities and duration of stay within the State is and has been recognised universally and from earliest times. There are fundamental rights of the State itself as well as fundamental rights of the individual citizen, and the protection of the former may involve restrictions in circumstances of necessity on the latter. The integrity of the State constituted as it is for the collective body of its citizens within the national territory must be defended and vindicated by the organs of the State and by the citizens so that there may be true social order within the territory and concord maintained with other nations in accordance with the objectives declared in the preamble to the Constitution. (*Osheku v. Ireland*, 1986, I.R. 733, 746)

Famously, this Supreme Court ruling was upheld and extended in *Bode Bode (A Minor) -v- Minister for Justice, Equality & Law Reform & Ors* (2007) with the following judgement: ‘[...] the State may also exercise its powers so as to take actions in a particular situation where it has been determined that the common good is served by giving benefits of residency to a category of foreign nationals – as a gift, in effect.’ Yet this speech-act *event* demonstrating the rights of the state and the absolute nature of sovereign power is quickly followed by Minister Ahern’s caveats: a list that runs from international conventions to EU Treaty rights, all of which serves to undermine the seemingly absolute power of the security, territory, population triumvirate. As far back as Hegel’s *Elements of the Philosophy of Right* it has been noted that sovereignty is not the foundation of modern state power but rather an effect of the particular relationship between state formation, civil society and ‘the people’ (Spinoza’s ‘the multitude’).⁸ Taking this seriously involves refusing the image of an axiomatic and absolute relationship between state-security, territory and population – a political ‘ontology’ whereby the present-being is stabilized in locality, rooted to ‘soil’ and thus configured bodily (Derrida 2005: 157; see also 1994).⁹ Instead, we wish to suggest that the assemblage of security, immigration and integration has required a particular (albeit localized) performance of the state and its sovereignty. The authority of the state is based on juridical authority; the state has it within its *gift* to grant rights and uphold the common good. The assumption, therefore, is that to study security, immigration and integration is to study the state. But this ontology is embedded in a

⁸ TH Marshall (1977) for example traces the modern form of citizenship to the moment in which absolute state power cedes to people’s rights to property, *habeas corpus*, due process, what Michel Foucault once (albeit hesitantly) termed the ‘democratization of sovereignty’ (Rose and Valverde 1998: 541-551).

⁹ Ontology for Derrida is the ‘axiomatic linking indissociably the ontological value of present-being [on] to its *situation*, to the stable and presentable determination of a locality, the *topos* of territory, native soil, city, body in general’ (Derrida 1994: 82). In this sense he may argue that all national memories of rootedness are rooted in memories of or anxieties over the displacement of population.

context of a vanishing Common Travel Area and the progressive up-loading of security, immigration and integration to EU competence. These speech-act *events* show in their performance a fragile, contested and eroding sovereignty.

By briefly attending to this current legislation on immigration and residency, it becomes possible to discern two important lessons. Firstly, legislation on migration management renders immigration (and thus integration) as a matter of security. Secondly, and following Derrida's understanding of 'ontopology', we may venture that to perform state power necessarily involves something excessive, almost. Regulating bodies by evoking the powerful triumvirate of state-security, territory and population paradoxically carries with it insecurity, and thus a certain metaphysical quality. The state thus configured cannot merely manage, regulate or govern population and territory, i.e. reveal the State to be nothing more than a form of governing. The state must evoke something beyond; a soul, or spirit, perhaps?

3. The Soul of Integration

In his contribution to the 2006 McGill Summer School then Minister for Justice, Equality and Law Reform, Michael McDowell, TD describes the challenge of reconciling diversity and cohesion from the position of liberal republicanism. But what does he mean by cohesion? It is not simply a shared economic and social existence; rather, cohesion denotes 'a sense of pride', that you are 'cheering for' our society:

So, while we live in a society and in a world in which there is huge mobility, we cannot simply throw out the notion of some form of necessary social cohesion. In some sense a spirit, or a soul, or a personality, or a shared minimum set of values is at the heart of society. We aren't a monochrome society. We aren't simply a Celtic, a Gaelic, or a Catholic society. [...]

But his vision of society composed of real sets of values and an always-already diverse 'spirit' is marked off as different from the values and spirit evident in other nation-states:

You might believe, and I don't, in the notion that there is a simple Irish soul, that there is a single definition of what it is to be an Irish citizen, that there is a single set of values which all Irish citizens must hold. If you hold this belief, then you may be attracted to the French approach to integration which is that your daughters will not wear a veil to school, your sons will not wear skull caps to school, you must learn French, you must learn to be a citizen of the French republic, you must effectively go under the yoke of French republicanism to participate in French society, and diversity will be frowned upon to the extent that it conflicts with those aims. [...] We have in this country in the past accorded to the Protestant and Jewish faiths the right to organize their education as they see it. Whether that is wise or unwise is a matter for debate, but we cannot now withdraw that right from newer migrant groups into Irish society. I don't think we can say that the drawbridge now comes up and that everyone must conform to a single form of state secular education in pursuit of social cohesion. I believe that the French approach is unnecessarily rigid. I believe that we can, by adopting a slightly less ideological approach in Ireland, allow for diversity. [...] Integration is

essential at a certain level, but it cannot be pushed the whole way. (McDowell 2006: 57-62 passim).

It is easy – far too easy – to divide a statement such as this into its constituent elements and then seek to challenge the basis of each. Take for example the issue of diversity and education. Catholic ‘state’ schools (ninety three per cent of all primary schools in 2007) are the prevailing form of education provision in Ireland, and Catholic children are prioritized in enrolments. Indeed, the resulting potential for the exclusion of immigrant children is one of the bases for ongoing discussions on the future of Catholic patronage (see Irish Catholic Bishops’ Conference 2007, 2008). Thus, a convincing argument can be made that the toleration of faith-based education in Ireland has little to do with either a historical respect for diversity or a contemporary concern for migrants’ rights and quite a lot to do with a denominational education system with a weak connection to *res publica*.¹⁰ The conclusion that one could easily reach by unpicking the claims made in this statement is that when it comes to nailing down Irish liberal republicanism’s position on diversity the facade crumbles. Each constituent element of this position is fungible. The statement looks the more tangible (‘ideological’) example of France in the hope that the mirror will show our preferred self-image. It sketches a diagram of social cohesion that runs from minimum values to sentimental loyalty and along the way stretches credibility beyond its threshold of elasticity. Then there are cherry-picked examples from Irish history, vigorously massaged to fit with an ideological position that refuses the label of ideology. And, holding all of these elements together, there is an underlying assumption that unlike our European neighbours Ireland has somehow found a formula by means of which to balance diversity and cohesion. One should conclude that others would do well to follow the Irish example – they, apparently, have too much integration.

It is certainly striking that issues of social cohesion, nationalism and even racism are spoken of in terms of ‘culture’, values and tolerance. Rather than describing material and structural conditions, the former Minister speaks of the ‘heart’, ‘soul’ and ‘personality’ of Ireland, a societal *volk-geist* described in elusive terms because it is always-already diverse – ‘We aren’t simply a Celtic, a Gaelic, or a Catholic society’ (2006: 57). The philosopher and psychoanalyst Slavoj Žižek asks an important question in this regard: Why are so many problems today perceived as problems of intolerance, rather than as problems of inequality, exploitation or injustice? Žižek concludes that a ‘culturalization of politics’ is occurring and is concerned to show the

¹⁰ It is also important to note that one of the facilitating conditions behind the former Minister for Justice’s statement is a belief that Ireland has escaped immigration and race-based politics evident in other Member States such as France. Moreover, Ireland, the former Minister claims, has escaped the racial street violence evident in other countries. Such a position can be challenged. Many commentators have argued that the lack of attention to far-right, race-based politics in Ireland may be a consequence of the lack of any grounds upon which any such political discourse could form – simply because those policy grounds are already occupied by political parties that configure themselves to be centrist. Moreover, while organized race-based street violence is uncommon in Ireland, as are reported instances of racially-motivated crime, one has to be very careful in what once classifies and counts. The recent EU-MIDIS report showed an entry for Ireland in the ‘top ten’ Member States in which minorities experienced discrimination: fifty four per cent of Sub-Saharan Africans surveyed reported experiencing discrimination in a twelve-month period (n = 503). Sub-Saharan Africans also reported very high levels of experiences of ‘racially motivated’ crime and harassment, together with high levels of ‘policing’ and low levels of trust in the authorities – two thirds of those who claimed to have experienced ‘racially motivated’ crime and/or harassment did not report these offences.

ways in which political differences are naturalized, placed in the realm of inveterate, set in their ways-of-life identities and, thus, become matters of toleration rather than emancipation or struggle. Liberalism, in this sense, tolerates cultural differences as long as they are largely confined to the private realm and secondary to minimum sets of values – values assumed to be good and true for all but nonetheless built on the values of some. This is ethnocentrism, but a form of ethnocentrism justified on the basis that our ethno is a good one to have at the centre, and given a boost by the scripting of contemporary imperialisms as solely for the cause of liberal deliverance (Seymour 2008).

But Žižek is also careful to note that this ‘culturalization’ cannot be understood as the fashionable outward appearance of underlying processes, be it nationalism or racism. There is no such thing as *mere* appearances. Therefore, to frame Michael McDowell’s contribution to the McGill Summer School as a culturalist and pseudo-philosophical veil behind which is the ugly face of racism and exclusion is to miss the point. Politics (even culturalized politics) is not a form, appearance or illusionary expression of some more actual or real processes. As Clifford Geertz once put it:

There is, there can be, no backstage where we can go to catch a glimpse of [...] actors as “real persons” lounging about in street clothes, disengaged from their profession, displaying with artless candour their spontaneous desires and unprompted passions. They may change their roles, their styles of acting, even the dramas in which they play; but — as Shakespeare himself of course remarked—they are always performing. (Geertz 1966: 3)

The interesting invitation, therefore, in considering Irish liberal republicanism’s position on diversity is to actually take it seriously, to not push against the facade but rather study its appearance.

In ‘Strangers in Their Own Country’ (2001), a thoughtful essay written at the highpoint of both Ireland’s economic boom and net inward migration, Declan Kiberd explores issues of racism, multiculturalism and social change in Ireland. The essay makes use of examples ranging from identity politics in the United States to English football hooliganism to help think about the tension between the ‘culture’ of the nation-state and the stranger. The essay asks a simple question: is a liberal form of multiculturalism possible, whereby both national culture and minority difference may be respected? His answer, which shares more than a family resemblance to Michael McDowell’s contribution to the McGill Summer School a few years later, is that there is nothing inherently wrong with a national culture that enshrines a set of codes within the nation-state, and this should not necessarily take from the possibility of an inclusive multiculturalism.

How does an eminent literary scholar imagine reconciling diversity and cohesion? Instead of a semantic cluster of magical *volk*-speak composed of the ‘heart’, ‘soul’, ‘spirit’ or even the ‘personality’ of Ireland, Kiberd discussed the possible ways in which Irish national self-identity might be opened up to better deal with the category of the stranger or foreigner. Of course, his sources are literary, especially those artists whose creativity springs from and speaks to the tensions between the particular and the universal, the national *gemeinschaft* and the author in cosmopolitan *gesellschaft*. For example, ‘Joyce was one of the first artists [...] to imagine a “world without

foreigners”, a world possible once men and women began to accept the foreigner in the self and the necessarily fictive nature of all nationalisms [...]’ (Kiberd 2001: 64). In this line of thought there can be no essentially Irish culture, defined narrowly, into which the foreigner must integrate. To recognize the diversity within one’s national culture is at core an act of toleration, because ‘those who lack a sophisticated sense of their own origins are more likely to seek a simplified version of the past, in whose name to lash out at the foreign’ (Kiberd 2001: 65). But what of the potential flash-points when cohesion and diversity square off (these then to be hypothetical or just rare and repeated as one might a rumour)? Kiberd argues that the ‘right to practice one’s own culture in public should go very deep, but it can never be absolute in cases where it may override the rights of others’ (Kiberd 2001: 70).

It is unlikely that Declan Kiberd and the former Minister would find much in common if trapped in an elevator, but standing back from their positions one is struck by the similarity of their problematization of the issues, and the language tools used by each to address this problematization. Their discussions appear to be the same – *and appearances matter*. The perceived problem of migration is the balancing of ethnicity, minority rights and diversity, on one side, with national culture, shared values, and cohesion on the other side. If the balance is not achieved then the diversity of immigrants might well become the hard-shelled difference of so-called ‘parallel communities’; or, perhaps worse still, recognition of the internal diversity of national culture might fade into a rigid sense of our essential culture – something to be defended. Therefore, in order to accommodate their diversity we must recognize our own diversity. However, our historical diversity includes the instantiation of liberal values that are at the core of our capacity to recognize the diversity of others. Therefore, what is at stake for us is an engagement with our liberal values of toleration, liberal values that allow us to tolerate them, minimum sets of liberal values that must be shared by all because they are the real borderline between us and them.

Around the world one sees versions of this reductive problematization spoken of in local accents. For example, Declan Kiberd draws on the work of the US historian Arthur Schlesinger Jr. to support his argument that the alternative to supporting national culture is a fraying of the integrity of the nation-state into pockets of diversity, minority politics and, ultimately, ‘the cult of ethnicity,’ where suddenly everyone is a member of a minority and is demanding respect for their ‘culture’ (Schlesinger 1991: 20). This is the basis of Schlesinger’s argument for a reinvigorated common national culture, a reassertion of the USA *as American*. But Schlesinger also asserts that the freedom to practice one’s cultural traditions and beliefs — the basis for this entire debate — is a value of western civilisation, and ‘our’ civilisation should not have ‘guilt trips laid on it by champions of cultures based on despotism, superstition, tribalism, and fanaticism [... *Africans*] who show themselves either incapable of operating democracy or ideologically hostile to the democratic idea’ (Schlesinger 1991: 133-134). Here, again, we are encouraged to tolerate our own ethnocentrism, because our ethno is a good one to have at the centre. Western civilisation is identified as the well-spring of democracy, liberalism, tolerance¹¹, even multiculturalism.

¹¹ Kiberd also draws on the example of France and the philosophical insights of Julia Kristeva. Towards the end of *Etrangers à nous-mêmes* Kristeva asks: ‘How could one tolerate a foreigner if one did not know one was a stranger to oneself? And to think it has taken such a long time for that small truth’ (1991: 182). The liberal hope is that in a world where everyone recognises their essential

An (other) Introduction

Global demographics and international migration are increasingly problematized as matters of security. Global inequalities, the ease and potential speed of population movements, coupled with the rise of xenophobia and atavistic nationalism, have proven to be fertile ground for alarmist speculation. Most famously, in the early 1990s historians Matthew Connelly and Paul Kennedy predicted, ‘the rich will have to fight and the poor will have to die if mass migration is not to overwhelm us all’ (1994: 61). Connelly and Kennedy’s apocalyptic vision may be extreme, but it is certainly the case that migration is widely understood to present a ‘crisis’ to first-world security and to social and national integrity. In the recent FORESEC *Report on European Security* a complex policy matrix is provided to illustrate the interconnections between the key trends, drivers and threats facing Europe (Langton 2009: 61, figure 5). In the diagram, urbanization and population growth interact with terrorism, crime, trafficking and the medical bio-security risks emanating from the so-called third world. In this diagram the issue of reconciling diversity and social cohesion is a matter of security, and thus integration is held together with other threats in an assemblage. The EU, we are told,

[...] is regarded as a destination for migrants because of its perceived liberal border regime, economic benefits including healthcare, and the promise of a safer and more prosperous future for many people. For traffickers and criminals of many types Europe is the location of choice because of the “market” opportunities it offers. [...] Illegal migrants are often the chosen facilitator of the criminal and non-state world, once again highlighting the increased need to control borders at a time when globalization and the liberalization of trade regimes challenges the idea, and the European Union interior (Schengen) is virtually free of border controls. [...] However, rather than being transnational in character, responses remain based largely on national policies which react to the demands of domestic labour markets, post-colonial agreements, and national security concerns rather than recognising the transnational, even global, nature of the problem. (Langton 2009: 54-64 passim)

We began this essay with an epigraph from Franco Frattini, European Commissioner responsible for Justice, Freedom and Security. The epigraph is taken from his address to the High-level Conference on Legal Immigration held in Lisbon in 2007 in which he sets out many of the same challenges identified in numerous security reports. The

foreignness there will be no strangers and tolerance of diversity will be made possible. Kristeva sets out her position in plain terms in an interview:

One has never seen such numbers of Arabs and blacks in France. These populations, these new immigrants, are very different from Italian, Spanish, or Polish populations of the thirties or fifties, which wanted to integrate themselves and become French. At that time, there was a very positive image of France, connected with the French revolution, such that one might say, ‘Yes, I am Polish, but my children shall become ministers of France’ [...]

There is a tendency to reject, in the name of cultural pluralism, the good aspects of a tradition. [...] If you go about saying, ‘Destroy France. Take down the statues of Joan of Arc. No more champagne or *foie gras*,’ then you only further the sense of others that their identity is being menaced. (1993: 175-176 passim)

EU will continue to need immigration, but the right kind of immigration; the challenge is to facilitate the right kinds of mobility, while controlling that same mobility in such a way as to reduce risk and insecurity. On the issue of developing a comprehensive integration policy for Europe, Frattini is clear: the integration of legal immigrants and the securitization of Europe's borders are 'two sides of the same coin' (Frattini 2007: 5). In this complex assemblage of integration, immigration and security, the furtherance of securitization is assured, and 'there is *no migration without integration*' (ibid. [original emphasis]). Accordingly, Europe faces the challenges of managing the integration of immigrants and their diversity, but can meet these challenges by falling back on Europe's founding values and principles – 'our fundamental roots, the principles we inherited from our Founding Fathers' (ibid.). What we have here is ontopology, the axiomatic rooting of present-being bodily to territory or native soil (Derrida 1994: 82). In Derrida's sense ontopology is paradoxically rooted in insecurity and thus is excessive and suggests a metaphysical quality.

In Ireland many of the debates about migration to date have been focused on responses to state policy. At this juncture, and through an attention to assemblage, more work is required now concerning the lack of availability of a secure analytical category called 'the state', especially when one looks to the long history of the Common Travel Area and the progressive up-loading of competence in migration and integration policy to Europe. But the performance of state as speech act *events* in Ireland is one matter. What is most striking is the availability of oddly similar events with equally metaphysical qualities elsewhere – France, the USA, and in many other countries. It is necessary now to emphasize open and fluid research frames on the topics of integration, immigration and security, and to approach with skepticism debates solely transfixed by the magic of the nation-state.

References

- Ahern, D. (2010) *Press Release following the publication of the new Immigration, Residence and Protection Bill 2010*. <http://www.inis.gov.ie/>
- Bauman, Z. (2003) *Wasted Lives: Modernity and its Outcasts* (Cambridge: Polity)
- Bibler Coutin, S. (2005) 'Being En Route,' *American Anthropologist*, 107(2), pp. 195–206.
- Bigo, D. (1994) 'The European Internal Security Field' in Anderson, M. and den Boer, M. (eds.) *Policing Across National Boundaries* (London: Pinter).
- Boucher, G. (2008) Ireland's Lack of a Coherent Integration Policy, *Translocations*, Vol. 3, Issue 1, pp.5-28.
- Butler, J. (1997) *Excitable Speech: A Politics of the Performative* (London: Routledge).
- Buzan, B. and Wæver, O. (2003) *Regions and Powers* (Cambridge: Cambridge University Press).

Connelly, M. and Kennedy, P. (1994) 'Must It Be the Rest Against the West?' *The Atlantic Monthly*, December: pp. 61-69.

Deleuze, G. and Guattari, F. (2004) *A Thousand Plateaus (Continuum Impacts): Capitalism and Schizophrenia: 21* (New York and London: Continuum International Publishing Group Ltd.).

Derrida, J. (1994) *Spectres of Marx: The State of the Debt, the Work of Mourning and the New International* (New York: Routledge).

Derrida, J. (2005) *Rogues: Two Essays on Reason* (Palo Alto: Stanford University Press).

Dezenski, E. (2006) 'Address on the Security and Prosperity Partnership (SPP),' Conference on Reinforcing the Area of Freedom, Security, Justice and Prosperity in Europe and Its Neighbouring Countries, Brussels, Belgium January 24. (US Department of State, <http://usinfo.state.gov>).

EU-MIDIS (2009) *Main Results Report, EU-MIDIS results on the European Union Minorities and Discrimination Survey*. <http://www.fra.europa.eu/>

European Commission (1974) *Action Plan in Favour of Migrant Workers and their Families*. COM (74), 2250, 11/12/1974.

European Commission (2000) *Communication from the Commission to the Council, the European Parliament on a Community Immigration Policy*, COM (2000) 757, 22/11/2001.

European Commission (2005) *Communication from the Commission to the Council and the European Parliament - Priority actions for responding to the challenges of migration - First follow-up to Hampton Court*. COM (2005) 621, 30.11.2005.

European Council (2004) *Council of the European Union, Justice and Home Affairs Press Release, 2618th Council Meeting, 14615/04 (Presse 321)*.

European Council (2007) *Council Conclusions on the Strengthening of Integration Policies in the EU by Promoting Unity in Diversity, 2807th Council Meeting, 10267/07 (Presse 125)*.

European Union (1997) *The Treaty of Amsterdam, Amending the Treaty on European Union, the Treaties Establishing the European Communities and certain Related Acts (Amsterdam, 2 October, Article B)*.

EEC (1977) Council Directive on Education of the Children of Migrant Workers. Directive 77/486 EC, 25/7/1977.

Fanning, B. (2007) 'Integration and Social Policy', in Fanning, B. (ed.), *Immigration and Social Change in the Republic of Ireland* (Manchester: Manchester University Press).

- Geertz, C. (1966) 'The Impact of the Concept of Culture on the Concept of Man,' *Bulletin of the Atomic Scientists*, April, pp. 3-8.
- Goldgerb, D.T. (2009) *The Threat of Race. Reflections on Racial Neoliberalism*. (Blackwell).
- Gray, B. (2006) 'Migrant Integration Policy: A Nationalist Fantasy of Management and Control?' *Translocations*, 13 (1), pp. 121-141.
- Hegel, G. (1967). *Elements of the Philosophy of Right* (Oxford: Oxford University Press).
- Huysmans, J. (2006) *The Politics of Insecurity: Fear, Migration and Asylum in the EU* (London: Routledge).
- India, J.X. (2006) *Targeting Immigrants: government, technology and ethics* (London and New York: Blackwell).
- Interdepartmental Working Group on the Integration of Refugees in Ireland (2003), *Integration a two way process* (Dublin: Department of Justice, Equality and Law Reform).
- Irish Catholic Bishops' Conference (2007) *Catholic Primary Schools: A Policy for Provision into the Future* (Dublin: Veritas).
- Irish Catholic Bishops' Conference (2008) *Vision '08: A Vision for Catholic Education in Ireland* (Dublin: Veritas).
- Kennedy, President J.F. (1964) *A Nation of Immigrants* (New York: Harper Collins).
- Kiberd, D. (2001). Strangers in Their Own Country, in *Multiculturalism: A View from the Two Irelands*, Longley, E. and Kiberd, D. (eds.), pp. 45-75 (Cork: Cork University Press).
- Kristeva, J. (1991) *Strangers to Ourselves* (New York, London Toronto, Sydney, Tokyo, Singapore: Harvester, Wheatsheaf).
- Kristeva, J. (1993) 'Foreign Body, Julia Kristeva interviewed by Scott L. Malcomson,' *Transition*, 59: pp. 175-176.
- Langton C. (2009) 'Demographics and Security in Europe' in *Report on European Security: Trends, Drivers, Threats*, Giegerich, B. and Comolli, V. (eds), pp. 53-65 (JRC and CMI: FORESEC).
- Latour, B. (1986) 'Visualization and Cognition: Thinking with eyes and hands', *Knowledge and Society* (6), pp. 1-40.
- Lenihan, B. (2008) *Address by the Minister for Justice, Equality and Law Reform at the launch of the Immigration, Residence and Protection Bill 2008*. 29 January 2008. <http://www.inis.gov.ie/en/JELR/>

- Lentin, R. and McVeigh, R. (2006) *After Optimism: Ireland, Racism and Globalisation* (Dublin: Metro Éireann Publications).
- MacCormaic, R. (2009) 'A Fast Track to Deportations,' *Irish Times*, Saturday, September 12.
- Maguire, M., and Cassidy, T. (2009) 'The New Irish Question: Citizenship, Motherhood and the Politics of Life Itself', *Managing Migration: The Politics of Truth and Life Itself*, Maguire, M. and Murphy, F. a special issue of the *Irish Journal of Anthropology*, 13(2), pp. 12-32.
- Maguire, M. (2004) *Differently Irish* (Dublin: Woodfield Press).
- Marshall, T. H. (1977), *Class, Citizenship and Social Development* (Chicago and London: Chicago University Press).
- McDowell, M. (2007) *Address by An Tánaiste at the conference on Integration Policy – Strategies for a cohesive society*, 1 February 2007, <http://www.justice.ie/en/JELR>.
- McDowell, M. (2006) Immigration, Integration and Cultural Identity, in Mulholland, J. (ed.) *The Soul of Ireland: Issues of Society, Culture and Identity* (Dublin: Liffey Press).
- Office of the Minister for Integration (2008) *Migration Nation: Statement on Integration Strategy and Diversity Management* (Dublin: Stationary Office).
- Patton, P. (1994) 'MetamorphoLogic: Bodies and Powers in A Thousand Plateaus', *Journal of the British Society for Phenomenology*, 25(2): pp. 157–69.
- Rose, N. and Valverde, M. (1998) 'Governed By Law?' *Social Legal Studies*, 7(4), pp. 541-551.
- Ryan, B. (2001) 'The Common Travel Area between Britain and Ireland', *Modern Law Review*, 64(6), pp. 855–874.
- Schlesinger, Jr. A.M. (1991) *The Disuniting of America: Reflections on a Multicultural Society* (New York and London: WW Norton and Company).
- Tampere European Council (1999) *Conclusions of the Presidency*, Bulletin EU nr. 10/1999.
- Žižek, S. (2008) *Violence* (London: Profile Books).
- Triadafilopoulos, P. (2011) "Illiberal Means to Liberal Ends? Understanding Recent Immigrant Integration Policies in Europe." *Journal of Ethnic and Migration Studies*, special issue on "The Limits of the Liberal State," forthcoming in VOL. 37, No. 6 (July 2011).
- Zolberg, A. (2006) *A Nation by Design* (Boston: Harvard University Press).

Court Cases Cited

Bode Bode (A Minor) -v- Minister for Justice, Equality & Law Reform & Ors [2007]
IESC 62 (20 December 2007)

Osheku v. Ireland [1986] I.R. 733 (H.C. at 746)