

IRELAND'S NEW RESPONSIBILITY: REFUGEES BUY THE IRISH ANOTHER ROUND

#1285

I. INTRODUCTION

Throughout Ireland's history, the world has viewed Ireland as its distant and helpless cousin.¹ Economic hardships, a confusion of political ideologies, British oppression, and mass emigration has stained the last few hundred years of Irish heritage.² However, over the last decade, the Irish not only persevered and overcame these obstacles, but also they transformed their small island into the economic envy of the European Union (EU).³ With this new found success comes significant responsibilities.⁴

For the first time in its history, Ireland has become a haven for asylum seekers from around the globe.⁵ Despite some challenges, Irish law in accordance with EU law has effectively conformed to cope with this sensitive issue.⁶ Ireland's continued willingness to diversify its neighborhoods will promote even greater economic prosperity. Furthermore, refugees will satisfy several of the economic demands of Ireland's massively growing economy. Asylum seekers granted refugee status in Ireland will satisfy present labor shortages in Ireland.⁷ Also, these refugees will allow Ireland to establish an economic partnership with non-EU countries.⁸

¹ See generally ALVIN JACKSON, *IRELAND, 1798-1998* (Blackwell Publishers Ltd. 1999).

² See generally *id.*

³ *Id.* at 416.

⁴ See *id.*; see also PAUL CULLEN, *REFUGEES AND ASYLUM SEEKERS IN IRELAND 1* (Carol Coulter ed., Cork University Press 2000).

⁵ Peter Barcroft, *Immigration and Asylum Law in the Republic of Ireland: Recent Developments and Proposed Statutory Reform*, 7 INT'L J. REFUGEE L. 84, 97 (1995).

⁶ See CULLEN, *supra* note 4.

⁷ JULIAN L. SIMON, *THE ECONOMIC CONSEQUENCES OF IMMIGRATION* 252 (Basil Blackwell, Inc. 1989).

⁸ See JACKSON, *supra* note 1; see also Central Statistics Office, *Trade with Non-EU Countries*, February 9, 2005, available at <http://www.cso.ie>.

The arrival of refugees has the potential to promote and foster greater economic cooperation between Ireland and non-EU countries.⁹ This connection between Ireland and non-EU countries will be established because refugees residing in Ireland maintain a common heritage and language with the people of their native lands. Ireland's government's further acceptance of refugees will have a positive affect on the Irish economy. Refugees will satisfy significant market demands that resulted from the birth of Ireland's incredible economic boom.

This comment will analyze Ireland's formation of an asylum policy, and the implications of this policy on Ireland's economy. Part II will trace the formation of Irish Refugee Policy from its invocation of the Geneva Convention relating to the Status of Refugees to the Refugee Act of 1996 as amended by the Immigration Acts of 1999, 2003 and the Illegal Immigrants (Trafficking) Act of 2000. After a discussion of the legal issues guiding European Union and Irish asylum policy, Part III will examine all the stages of the Irish asylum process. Part IV will examine the basic needs of refugees entering Ireland. Furthermore, Part V will address the past ethnic composition of Ireland compared to its present composition. Part VI will illustrate the characteristics, attributes, and labor skills of refugees. Part VII will examine the recent economic prosperity of Ireland. Moreover, Part VIII will predict that three significant factors concerning Ireland's present refugee policy will allow Ireland to continue to enjoy economic prosperity. First, the acceptance of refugees will import innovative economic ideas to Irish society. Second, individuals granted refugee status would satisfy recent labor shortages in crucial sectors of the Irish economy. Third, the establishment of a more culturally diverse society will exponentially increase trade over the proceeding generations. Ireland's continued willingness to form a refugee policy that is fair and just will solidify Ireland as permanent player in the global economic community.

⁹ See JACKSON, *supra* note 1; see also *Trade with Non-EU Countries*, *supra* note 8.

II. FORMATION OF REFUGEE POLICY

A. *The Geneva Convention of 1951*

The term “asylum seeker” is defined as a person who seeks recognition as a refugee in accordance with the 1951 Geneva Convention Relating to the Status of Refugees.¹⁰

Additionally, Section 2 of the Refugee Act of 1996 defines a refugee as,

[A] person who, owing to a well founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his or her nationality and is unable or, owing to such fear, is unwilling to avail himself or herself of the protection of that country; or who, not having a nationality and being outside the country of his or her former habitual residence, is unable or, owing to such fear, is unwilling to return to it . . .¹¹

Ireland has been a party to the United Nations (U.N.) Geneva Convention relating to the Status of Refugees since November 29, 2004 and it also has been a party to the 1967 Protocol relating to the Status of Refugees since November 6, 1968.¹² The Geneva Convention relating to the Status of Refugees was originally adopted to handle individuals forced from their homelands due to the conflicts arising from World War II.¹³ Moreover, it “has proved [to be] remarkably resilient in helping to protect an estimated 50 million people in all types of situations.”¹⁴ The Geneva Convention of 1951 was important because it set out a refugee’s basic human rights, and “[i]t recognized the international scope of refugee crises and the necessity of international cooperation, including burden-sharing among states”¹⁵ This Convention outlines a refugee’s rights to work, education, and accessibility to travel documents.¹⁶ Also, this agreement

¹⁰ Reception and Integration Agency of the Department of Justice, Equality, and Law Reform, *The Asylum Process*, at http://www.ria.gov.ie/the_asylum_process; Geneva Convention and Protocol Relating to the Status of Refugees, October 4th, 1967, 189 U.N.T.S. 137.

¹¹ Refugee Act, No.17, 1996.

¹² Barcroft, *supra* note 5, at 97; *see also Geneva Convention*, 189 U.N.T.S. 137 (1996).

¹³ UNHCR, *Frequently Asked Questions about the 1951 Refugee Convention*, June 1, 2001, at <http://www.unhcr.ch> [hereinafter *Frequently Asked Questions*].

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

guarantees refugees the freedom of religion and movement.¹⁷ This document provides protection for those less fortunate individuals that have no choice but to leave their homelands due to social or political unrest.¹⁸ The protocol announced in 1967 removed the geographical and time limitations found in the original convention.¹⁹

Despite these hospitable expressions, the U.N. clearly indicated that this document didn't apply to individuals that have committed a crime against humanity, a war crime, or "a serious non-political crime outside the country of refuge prior to his admission to that country as a refugee[.]"²⁰ After decades of willful ignorance, the members of the United Nations realized that measures must be taken to protect those whose rights have been abused or usurped by situations of civil unrest within the borders of their homelands.²¹ However, in Ireland, the legislative methods needed to solidify these principles into law were left undetermined until the enactment of the Refugee Act in 1996.²²

B. An Integrated Europe

Before discussing relevant Irish legislation enacted in the 1990s, the evolution of European asylum policy following the Geneva Convention must be examined because the roots of Irish legislation lie in collective European legislation.²³ Ireland would not develop its own policies in the form of national legislation until many years after the Geneva Convention.²⁴

Ireland and other European nations strived for an economically and politically integrated union

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Frequently Asked Questions, supra* note 13.

²⁰ *Geneva Convention*, 189 U.N.T.S. 137 (1996).

²¹ *Frequently Asked Questions, supra* note 13.

²² Barcroft, *supra* note 5, at 97.

²³ *The State of the World's Refugees 2000*, 2001 Y.B. 159 on U.N.H.C.R [hereinafter *The State of the World's Refugees*].

²⁴ *Integration: A Two Way Process, Report to the Minister for Justice, Equality, and Law Reform by the Interdepartmental Working Group on the Integration of Refugees in Ireland*, UNHCR at 12 (1999) [hereinafter *Two Way Process*].

through various treaties originating from the enactment of the European Coal and Steel Treaty in 1951 to the Treaty on European Union in 1992.²⁵ The Treaty on European Union in 1992 was significant because it progressed European integration through the introduction of a single currency.²⁶ This treaty also “harmonize[d] asylum and immigration policies . . . [with] the introduction of the concept of EU citizenship.”²⁷ This would be the beginning of economic and political integration.²⁸

During the years of gradual integration, the European community introduced several significant agreements regarding refugees.²⁹ In 1990, the Dublin Convention established standards to determine the state responsible for examining a particular asylum request.³⁰ Before this Convention, asylum applicants roamed between member states submitting applications.³¹ All 15 EU members enacted this agreement domestically by September 1, 1997.³²

In 1990, the EU sought further cohesion between member states.³³ The 1990 Schengen Convention was another enactment paving the way for Irish legislation.³⁴ This convention sought to eliminate internal borders between member states while strengthening external borders surrounding the EU.³⁵ The only EU countries that were reluctant not to participate in this convention were Ireland, Denmark, and the United Kingdom.³⁶ In 1992, the London Resolutions, a non-binding resolution announced by the European Community ministers, dealt

²⁵ BRUCE CAROLAN, EUROPEAN UNION LAW FOR IRISH STUDENT 11-12 (Gill & Macmillan 2004).

²⁶ *Id.*

²⁷ *The State of the World's Refugees*, *supra* note 23, at 159.

²⁸ CAROLAN, *supra* note 25, at 11-12.

²⁹ *The State of the World's Refugees*, *supra* note 23, at 159.

³⁰ DEMETRIOS G. PAPADEMETRIOU, COMING TOGETHER OR PULLING APART? THE EUROPEAN UNION'S STRUGGLE WITH IMMIGRATION AND ASYLUM 39 (Carnegie Endowment for Int'l Peace 1996).

³¹ *The State of the World's Refugees*, *supra* note 23, at 159.

³² *See id.*

³³ *Id.*

³⁴ *Id.*

³⁵ PAPADEMETRIOU, *supra* note 30, at 24-25.

³⁶ *The State of the World's Refugees*, *supra* note 23, at 159.

with immigration issues.³⁷ This resolution defined a manifestly unfounded asylum application as asylum applicants that have no serious risk of persecution upon being returned to their homeland.³⁸ Moreover, in 1997, EU member states committed to the development of uniform integration and common asylum policies within a five-year period in the Treaty of Amsterdam.³⁹ The Treaty of Amsterdam was a promise between member states to dedicate themselves to the serious issues concerned with asylum seekers.⁴⁰ These significant resolutions by the EU paved the road for Ireland to apply these standards while introducing its own legislation in order to make the proper adjustments to establish their own effective asylum policy.⁴¹

C. Proposed E.U. Council Decisions

In 2004, the EU proposed the establishment of the European Refugee Fund.⁴² This fund consists of appropriations to ensure that all member states formulate their own asylum policies in accordance with acceptable standards so that more uniform policies would be developed throughout the EU.⁴³ It also takes into account the needs of the most vulnerable asylum seeking groups.⁴⁴ These groups would consist of unaccompanied minors, single mothers, victims of torture, and individuals needing medical treatment.⁴⁵

Three of the most important fifteen recommendations of the European Refugee Fund proposal are the first, second, and seventh recommendations.⁴⁶ The first recommendation discusses the importance of improving reception facilities.⁴⁷ In many cases, vulnerable

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *The Asylum Process, supra* note 10.

⁴² 2004 O.J. (C 318) 30.

⁴³ *Id.* at 30.

⁴⁴ *Id.* at 31.

⁴⁵ *Id.*

⁴⁶ *Id.* at 31-33.

⁴⁷ *Id.* at 31.

individuals are overlooked due to overcrowding.⁴⁸ The second recommendation states that the European Refugee Fund may not “support returns if it cannot be guaranteed that people can return to their home country safely and with respect for their human rights.”⁴⁹ The seventh recommendation emphasizes that host country’s officials should become more active in learning foreign languages in order to effectively integrate refugees into society.⁵⁰ The recommendations presented in the proposal for a Council Decision establishing the European Refugee Fund are intended to bring all the member states’ policies and procedures into line so that only one European level exists.⁵¹

Similar to the proposal above, the Proposal for a Council Directive on minimum standards for the qualification and status of third-country nationals and stateless persons as refugees is intended to harmonize the national asylum systems of the EU by discouraging asylum shopping.⁵² Asylum shopping allows asylum seekers to apply for stay in nations with the most liberal policies.⁵³ This proposal establishes minimum standards used to grant asylum requests.⁵⁴ These two recent proposals would accelerate the establishment of a common asylum policy within the EU.⁵⁵

D. Ireland’s Refugee Legislation

The Refugee Act of 1996, as amended by later acts, was composed with the intention to give statutory effect to the policies under the 1951 Geneva Convention relating to the Status of

⁴⁸ 2004 O.J. (C 318) 30, 31; Vulnerable individuals include sick individuals and young children.

⁴⁹ *Id.* at 32.

⁵⁰ *Id.* at 33.

⁵¹ *Id.* at 30.

⁵² 2002 O.J. (C 221) 43, 43.

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ 2004 O.J. (C 318) 30; *see also* 2002 O.J. (C 221) 43.

Refugees and the 1967 protocol.⁵⁶ Section nine of the Act states that an asylum applicant “shall be allowed to enter the country and to remain there until . . . his/her application is transferred to another country under the provisions of the Dublin convention; . . . the application is withdrawn or deemed to be withdrawn; . . . [or] the application is rejected.”⁵⁷ Moreover, section twenty-four of the Act defines a “programme refugee” as an individual who has been granted permission to enter or remain in Ireland for temporary protection.⁵⁸ These individuals would usually be invited to Ireland upon request from the United Nations High Commissioner on Refugees (UNHCR) in the event of a humanitarian crisis.⁵⁹ The recent amendments to the Act provide that a Refugee Appeals Tribunal is established in order to decide appeals.⁶⁰ At this time only five sections of the Act have been implemented, but Irish legislators are optimistic that most of the Act will be implemented within a few years.⁶¹

Moreover, the Refugee Act of 1996 is the primary statutory authority expressing the rights and entitlements of refugees in Ireland.⁶² This Act gives refugees the right to employment, education, receipt of medical services, travel, religious freedom, access to Irish courts, and membership to organizations and associations.⁶³ This Act preserved the rights of refugees in the hopes that these individuals might achieve a lifestyle resembling that of Irish citizens.⁶⁴ Rights

⁵⁶ See generally *The Asylum Process*, *supra* note 10; this act was later amended by section 11(1) of the Immigration Act 1999, section 9 of the Illegal Immigrants (Trafficking) Act 2000 and Section 7 of the Immigration Act 2003

⁵⁷ European Council on Refugees and Exiles, IRELAND, *available at* <http://www.ecre.org/conditions/2000/ireland.shtml>; Refugee Act, No.17, 1996.

⁵⁸ Refugee Act, No.17, 1996.

⁵⁹ See generally IRELAND, *supra* note 57.

⁶⁰ See generally *id.*

⁶¹ See generally *id.*

⁶² *Two Way Process*, *supra* note 24, at 12.

⁶³ *Id.*

⁶⁴ See *id.* at 12-13.

defined in the Refugee Act of 1996 are similar to the rights of refugees outlined in the U.N. Geneva Convention relating to the Status of Refugees.⁶⁵

III. ASYLUM PROCESS

A. *The Process*

In order to sufficiently understand Irish asylum policy, an examination of the asylum process is required. Upon arrival into Ireland, asylum seekers submit documentation and are fingerprinted by State officials after completing an application for asylum.⁶⁶ After the application is submitted, the asylum seekers will be called for an initial interview in order to make specific inquiries.⁶⁷ First, the interviewer inquires about the legal grounds for allowing or disallowing the individual to retain refugee status.⁶⁸ Second, the nationality, identity, and country of origin are determined.⁶⁹ Third, information regarding the applicant's travel to Ireland is ascertained.⁷⁰ This would include the route of travel and the carriers used for transport.⁷¹ Fourth, the interviewer determines the reasons why the applicant seeks refugee status in Ireland.⁷²

After the initial application procedures are completed, the asylum seekers are transferred from the reception centers to long-term accommodation structures usually located outside urban areas.⁷³ If individuals cannot these costs, then they are able to apply for State assistance.⁷⁴

⁶⁵ *Id.* at 13.

⁶⁶ Refugee Information Service, *The Asylum Process*, at <http://www.ris.ie/asylumprocess>.

⁶⁷ *See generally id.*

⁶⁸ *See generally The Asylum Process, supra* note 10.

⁶⁹ *Id.*

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² *Id.*

⁷³ *The Asylum Process, supra* note 10; Refugee Information Service, *supra* note 66.

⁷⁴ UNITED NATIONS HIGH COMMISSIONER FOR REFUGEES, COUNTRY CHAPTER: IRELAND, (2004).

Children under the age of eighteen years old are provided primary and secondary education.⁷⁵ Medical services are also available without cost.⁷⁶ “Asylum-seekers in Ireland are banned by the State from taking up paid work (despite past support jointly by IBEC, ICTU and the Irish National Organization of the Unemployed that asylum-seekers should be allowed to work six months after their applications were lodged).”⁷⁷ Asylum seekers wait in a state of limbo while their applications are processed.⁷⁸

B. Decision Making

After the asylum seeker submits his or her application, the Office of the Refugee Application Commissioner (ORAC) conducts an investigation to determine whether the applicant should be granted Refugee Status as outlined under the amended Refugee Act of 1996.⁷⁹ Thereafter, an applicant will be required to attend a second interview in order to allow the individual to explain the reasons why he or she fears return to their country.⁸⁰ The ORAC will determine if the applicant presented credible facts to the State.⁸¹ The Commissioner will examine whether the asylum seeker provided adequate documentation to support his claim, and whether the applicant gave a reasonable explanation for his or her claim that Ireland was the first country in which he or she arrived after leaving his or her native country.”⁸² The Commissioner will inform the asylum seeker by letter of its decision.⁸³ The Commissioner may make a

⁷⁵ *See generally id.*

⁷⁶ *See generally id.*

⁷⁷ Irish Refugee Council, *Asylum-Seeker and Refugee Statistics in Ireland from January to June 2004*, available at <http://www.irishrefugeecouncil.ie/stats.html> [hereinafter *Asylum-Seeker and Refugee Statistics*].

⁷⁸ *The Asylum Process*, *supra* note 10.

⁷⁹ Catherine Kenny, *Asylum in Ireland: The Appeal Stage, A Report on the Fairness and Sustainability of Refugee Determination at Appeal Stage*, 2000, Irish Refugee Council, at 27.

⁸⁰ *Id.*

⁸¹ *The Asylum Process*, *supra* note 10.

⁸² *Id.*

⁸³ Kenny, *supra* note 79, at 27-29.

decision that the application was manifestly unfounded, a negative decision, or a positive decision.⁸⁴

At the first instance,⁸⁵ the Commissioner may announce that the application is manifestly unfounded.⁸⁶ A finding that an application is manifestly unfounded means that an asylum applicant has no serious risk of persecution upon being returned to their homeland.⁸⁷ *Zgnat'ev v. the Minister for Justice, Equality and Law Reform*⁸⁸ indicates the difference between the appeals process for negative decisions and manifestly unfounded decisions.⁸⁹ The *Zgnat'ev* case states that an individual may appeal when his or her application is believed to be manifestly unfounded.⁹⁰ However, the Tribunal will only examine the application on the basis of documentation because the individual is not entitled to an oral hearing.⁹¹

An asylum seeker will have fifteen days from the date of notification to appeal the negative decision to the Refugee Appeals Tribunal.⁹² The asylum seeker may request an oral hearing requiring his or her attendance, or the Tribunal may simply arrive at a determination based on previous fact-finding and provided documentation.⁹³ If the Tribunal affirms the decision of the Commissioner, the Minister will make an immediate deportation order for the applicant.⁹⁴ However, if the Tribunal makes a positive decision, then the individual will immediately be granted full refugee status.⁹⁵

⁸⁴ *Id.*

⁸⁵ “The First Instance” is Irish legal terminology used to refer to the first level of decision-making. This level of jurisdiction is synonymous with the United States Federal District Courts.

⁸⁶ Kenny, *supra* note 79, at 29.

⁸⁷ *The State of the World's Refugees*, *supra* note 23, at 159.

⁸⁸ *Zgnat'ev v. the Minister for Justice, Equality and Law Reform* [2001] 70 I.E.H.C.

⁸⁹ Kenny, *supra* note 79, at 30.

⁹⁰ *Zgnat'ev*, [2001] 70 I.E.H.C.

⁹¹ *Id.*

⁹² Kenny, *supra* note 79, at 28.

⁹³ *Id.*

⁹⁴ *Id.*

⁹⁵ *Id.*

A positive decision will allow the applicant to be recognized as a refugee as stated in the Refugee Act.⁹⁶ The individual will be afforded the right to work, to start a business, to have the same education and training as an Irish citizen, and to access the same medical services and social welfare payments as an Irish citizen.⁹⁷ Furthermore, this decision will afford the refugee the right to access the national courts, “[t]o buy and sell property”, and “[t]o membership of associations or trade unions[.]”⁹⁸ However, negative decisions prohibit the applicant from attaining these rights.⁹⁹

In certain situations, Irish officials will decline to examine an application because an applicant had landed in a safe country before arriving in Ireland.¹⁰⁰ In *Anisimovsa v. Minister for Justice*, a Russian asylum applicant had stopped in London, and then she voyaged to Ireland to apply for asylum.¹⁰¹ Ireland’s Supreme Court held that once an asylum seeker has reached a safe country that he or she is able to apply for asylum, he or she is unable to travel to other safe countries to seek asylum.¹⁰² This rule prevents asylum shopping.¹⁰³ In *Anisimovsa*, Ireland’s Supreme Court held that even though the asylum applicant had spent less than twenty-four hours in England, the applicant must be immediately returned to England from Ireland where she could apply for asylum with the British government.¹⁰⁴

IV. MEETING THE BASIC NEEDS OF REFUGEES

⁹⁶ *Id.* at 27.

⁹⁷ *Id.*

⁹⁸ Kenny, *supra* note 79, at 28.

⁹⁹ *Id.*

¹⁰⁰ *Anisimova v. the Minister for Justice* [1997] 72 I.E.H.C.

¹⁰¹ *Id.*

¹⁰² *Id.*

¹⁰³ *See id.*

¹⁰⁴ *Id.*

Before refugees can be integrated into Irish society allowing them to become integral components of Ireland's economic structure, Ireland's government must meet refugees' basic needs.¹⁰⁵ Upon entering Ireland asylum seekers are in immediate need of services such as accommodation, welfare support, and healthcare.¹⁰⁶ Also, asylum seekers granted refugee status have more long-term needs such as career training, English training, and education.¹⁰⁷ If refugees do not have adequate resources to obtain housing, refugees become eligible for local authority housing.¹⁰⁸ The Irish government will satisfy the basic accommodation needs of refugees who are unable to afford housing.¹⁰⁹ Refugees that do not qualify for complete accommodation provision may be eligible for supplemental benefits under the Supplementary Welfare Allowance scheme.¹¹⁰ This assistance would supplement the amount of rent that can be paid by a refugee.¹¹¹ Additionally, refugees who do not have adequate resources to live humanely can qualify for welfare assistance from the Irish government.¹¹² Both Irish citizens and non-citizens residing in Ireland are entitled to social welfare payments on the same basis.¹¹³

Similar to welfare support, "[r]efugees are entitled to the same level of health care as Irish citizens."¹¹⁴ Studies have shown that health care needs of refugees are usually determined by their previous living conditions.¹¹⁵ Ireland's government has realized that medical providers to refugees should be adequately trained in cultural differences so they are better equipped to

¹⁰⁵ See generally *Two Way Process*, *supra* note 24, at 13-14.

¹⁰⁶ See generally *id.*

¹⁰⁷ *Id.*

¹⁰⁸ *Id.* at 14.

¹⁰⁹ *Id.*

¹¹⁰ *Id.*

¹¹¹ *Two Way Process*, *supra* note 24, at 14.

¹¹² *Id.*

¹¹³ *Id.*

¹¹⁴ *Id.*

¹¹⁵ *Id.* at 31.

treat individuals from culturally diverse backgrounds.¹¹⁶ Studies have demonstrated that refugees experiencing high levels of anxiety and stress seek medical treatment for physical ailments at a higher rate than refugees with good mental health.¹¹⁷ Poor mental health results from characteristics associated with feelings of loneliness and isolation.¹¹⁸ Also, refugees having poor mental health tend to exhibit poor English skills.¹¹⁹ This correlation could be due to the frustration arising out of living in a society without the ability to communicate.¹²⁰

Both refugees and asylum seekers are provided education at primary and post-primary schools.¹²¹ Specially qualified teachers are employed in schools in order to provide younger refugees with an education that provides intensive English language assistance and training.¹²² In regards to education at the university level, refugee students are in the same position as their Irish colleagues in qualifying for admittance and receiving grants.¹²³ Moreover, adult refugees have the opportunity to participate in English language training classes so they may have an easier transition while integrating into Irish society.¹²⁴ English language training will promote employment opportunities for refugees.¹²⁵ Ireland's government offers a job placement service that matches refugees seeking employment with specific Irish employers.¹²⁶ By meeting the basic needs of refugees, Ireland will be able to minimize their costs in integrating refugees into Irish society while maximizing refugees' benefits to the Irish economy.¹²⁷

¹¹⁶ *Id.*

¹¹⁷ *Two Way Process*, *supra* note 24, at 31.

¹¹⁸ *Id.*

¹¹⁹ *Id.*

¹²⁰ *See id.* at 14.

¹²¹ *Id.* at 13.

¹²² *Id.* at 13-14.

¹²³ *Two Way Process*, *supra* note 24, at 14.

¹²⁴ *Id.*

¹²⁵ *Id.*

¹²⁶ *Id.*

¹²⁷ *See id.* at 13-14.

V. IRELAND'S PAST AND PRESENT ETHNIC COMPOSITION

A. Statistics Relating to Asylum Seekers

In order to understand how the Irish asylum policy is implemented, the statistics relating to refugees must be examined so the type of individuals participating in this process will be known. From 1995 to 2000, roughly 10,000 asylum seekers entered Ireland.¹²⁸ During this period, Ireland's population increased from around 3,600,000 to 3,900,000.¹²⁹ Asylum seekers only constituted for 3.3% of this population change.¹³⁰ However, the overwhelming majority of asylum seekers entered the country through Cork or Dublin.¹³¹ These two cities' population change in this period was around 70,000.¹³² Moreover, these 10,000 asylum seekers constituted for approximately 14% of the population increase in these two significant Irish cities.¹³³ This caused a clear change in the ethnic composition of urban neighborhoods.¹³⁴

As discussed earlier, groups of refugees that fled their homelands due to war or other widespread conflicts, and that are granted residence in Ireland at the request of the UNHCR are referred to as programme refugees.¹³⁵ Ireland has consistently accepted groups of these refugees since the middle of the twentieth century.¹³⁶ In 1956, Ireland accepted 530 Hungarian refugees.¹³⁷ Furthermore, 120 Chileans and 26 Iranian Bahais¹³⁸ were admitted to Ireland between 1973 and 1985.¹³⁹ Presently, 1,300 Bosnians and 800 Vietnamese are residing in

¹²⁸ CULLEN, *supra* note 4, at 1.

¹²⁹ Central Statistics Office, Census 2000, *available at* <http://www.cso.ie>.

¹³⁰ *Id.*

¹³¹ *Id.*

¹³² *Id.*

¹³³ *Id.*

¹³⁴ CULLEN, *supra* note 4, at 1.

¹³⁵ *Two Way Process*, *supra* note 24, at 2.

¹³⁶ *Id.*

¹³⁷ *Id.*

¹³⁸ Individuals belonging to a religious movement originating in Iran in the nineteenth century and emphasizing the spiritual unity of mankind.

¹³⁹ *Two Way Process*, *supra* note 24, at 2.

Ireland.¹⁴⁰ However, Kosovar refugees account for the most recent influx of programme refugees gaining entry into Ireland.¹⁴¹

Another class of individuals is seeking humanitarian leave to remain.¹⁴² Individuals receive humanitarian leave to remain when they don't satisfy all the requirements necessary to obtain refugee status.¹⁴³ However, these individuals' situations are analogous to the situations of refugees.¹⁴⁴ These individuals have faced an imminent threat in his or her native country.¹⁴⁵ These individuals are granted humanitarian leave to remain by Ireland's government on a case-by-case basis.¹⁴⁶ From 1992 to 2000, only seventy individuals have been granted humanitarian leave to remain in Ireland.¹⁴⁷

The most recent data reflects that during the first two quarters of 2004, 566 asylum seekers were admitted as refugees in Ireland, and 2,118 new applications submitted during this period.¹⁴⁸ Of these recognized 566, 213 were admitted at the first stage.¹⁴⁹ From January to June 2004, 955 applicants originated from Nigeria, and this was clearly the majority.¹⁵⁰ The other main countries of origin consisted of Romania with ninety-four, the Democratic Republic of Congo with ninety-four, China with ninety, and Somalia with seventy-seven.¹⁵¹

Over the last decade, Ireland has steadily increased its numbers of asylum seekers and recognized refugees.¹⁵² In 1994, 400 refugees were living in Ireland, and in 1996, this figure

¹⁴⁰ *Id.*

¹⁴¹ *Id.*

¹⁴² CULLEN, *supra* note 4, at 61.

¹⁴³ *Id.*

¹⁴⁴ *Id.*

¹⁴⁵ *Id.*

¹⁴⁶ *Id.*

¹⁴⁷ *Id.*

¹⁴⁸ *Asylum-Seeker and Refugee Statistics, supra* note 77.

¹⁴⁹ *Id.*

¹⁵⁰ *Id.*

¹⁵¹ *Id.*

¹⁵² *2003 Statistical Yearbook: Ireland, UNHCR, available at <http://www.unhcr.ch> [hereinafter *2003 Statistical Yearbook*].*

drastically dropped to sixty-nine.¹⁵³ However, in 2003, the United Nations High Commissioner for Refugees (UNHCR) reported that 5,971 recognized refugees inhabited Ireland.¹⁵⁴ Similarly, the number of asylum applicants increased from 107 in 1996 to 7,391 in 2003.¹⁵⁵ Furthermore, the total number of recognized refugees and asylum applicants living in Ireland between 1997 and 2003 remarkably increased from 1,711 to 13,362.¹⁵⁶

During the period between 1999 and 2003, Bosnia and Herzegovina produced the most Irish refugees ranging from 507 to 652 throughout these years due to government unrest and ethnic cleansing in the Balkan region.¹⁵⁷ Nigeria produced the second most refugees during this period.¹⁵⁸ Nigeria “which is not generally perceived as a country of crises, has seen considerable violence.”¹⁵⁹ More than fifty Nigerians “were killed in Lagos in November, 1999, during ethnic clashes.”¹⁶⁰ In southern Nigeria, “more than 2,000 Odi people were reportedly killed by government soldiers.”¹⁶¹ These figures illustrate that Ireland has experienced an extreme change in its ethnic composition in a very short period.¹⁶²

B. Diversification and Integration

Before an understanding can be established regarding refugee integration and contribution to the Irish labor market, an analysis of social integration of refugees is required. After this influx of mass immigration, questions arose asking how these new faces would integrate with the island’s natives.¹⁶³ “The sudden reversal of decades of emigration, and its

¹⁵³ *Id.*

¹⁵⁴ *Id.*

¹⁵⁵ *Id.*

¹⁵⁶ *Id.*

¹⁵⁷ *Id.*

¹⁵⁸ 2003 *Statistical Yearbook*, *supra* note 152.

¹⁵⁹ CULLEN, *supra* note 4, at 47.

¹⁶⁰ *Id.*

¹⁶¹ *Id.*

¹⁶² *Id.* at 1.

¹⁶³ *Id.*

replacement by immigration from all parts of the globe, has profoundly altered Irish self-identity.”¹⁶⁴ Similar to most other industrialized countries, social recognition as Irish is only attained through the birth from Irish parents.¹⁶⁵ After the mass immigration in the 1990s, both the non-government and government sectors initiated action in order to ensure effective integration.¹⁶⁶ “Integration means the ability to participate to the extent that a person needs and wishes in all of the major components of society, without having to relinquish his or her own cultural identity.”¹⁶⁷ If Ireland is going to continue to be successful in its efforts to promote multiculturalism, the Irish must sincerely celebrate all cultures including their own.¹⁶⁸ The responsibility of transforming Ireland into a land that embraces refugees and welcomes cultural diversity demands a joint effort from both the Irish government and the individual citizens of Ireland.¹⁶⁹ Particularly, each citizen shares a common responsibility to make Ireland a tolerant society.¹⁷⁰

Family reunification has been an important concern for government officials in attempting to effectively integrate refugees.¹⁷¹ The importance of family reunification has been highlighted in significant international documents such as the Universal Declaration on Human Rights of 1948 and the United Nations Covenant on Civil and Political Rights.¹⁷² “These [documents] identified the family as a natural and fundamental unit of society entitled to

¹⁶⁴ *Id.*

¹⁶⁵ *Promoting the Study of historical and Contemporary Migration, to and from Ireland, within Comparative International Framework, Using New Information and Communication Technologies*, Irish Centre for Migration Studies, available at <http://migration.ucc.ie> (last visited February 10, 2005) [hereinafter *Contemporary Migration*]; see also *Immigration Into Ireland: Trends, Policy Responses, Outlook*, B3-4102, 2001, available at <http://migration.ucc.ie/irelandfirstreposit.htm> [hereinafter *Immigration Into Ireland*].

¹⁶⁶ See *Contemporary Migration*, *supra* note 165; see also *Immigration Into Ireland*, *supra* note 165.

¹⁶⁷ *Two Way Process*, *supra* note 24, at 9.

¹⁶⁸ *Contemporary Migration*, *supra* note 165.

¹⁶⁹ *Two Way Process*, *supra* note 24, at 3.

¹⁷⁰ *Id.*

¹⁷¹ *Id.* at 32.

¹⁷² *Id.*

protection by society and the State.”¹⁷³ Family reunification exists when newly arriving asylum seekers are granted refugee status and are allowed to be reunited with family members who are also refugees.¹⁷⁴ This reunification eliminates loneliness and feelings of isolation for many refugees while raising their spirits.¹⁷⁵ Also, the reunification of relatives provides both emotional and social support for refugees in the host country because they will be near individuals from the same background and nationality.¹⁷⁶ Ireland has shown extreme sensitivity towards the issue of family reunification, and the government of Ireland has made important provisions to encourage and promote family reunification.¹⁷⁷

Over the last two decades the Irish government has diligently formed agencies and enacted legislation to effectively integrate refugees.¹⁷⁸ In Cork, a social housing project displayed a banner stating, “we wish we were refugees.”¹⁷⁹ These actions don’t illustrate the Irish’s disdain towards new arrivals, but it demonstrates the government’s transparent commitment to helping refugees.¹⁸⁰ Some Irish citizens argue that the government has become so sensitive to the plight of the refugees that the government has overlooked the needs of its own less fortunate citizens.¹⁸¹ This issue may cause future hardships for asylum seekers in the form of discrimination, but presently, this concern illustrates that the Irish government is sincere and diligent in its efforts to integrate refugees with the rest of Irish society.¹⁸² Since 1989, Ireland’s government has aggressively enacted anti-discriminatory and equal opportunity legislation.¹⁸³

¹⁷³ *Id.*

¹⁷⁴ *Id.*

¹⁷⁵ *Two Way Process*, *supra* note 24, at 32.

¹⁷⁶ *Id.*

¹⁷⁷ *Id.*

¹⁷⁸ *See generally* Immigration Into Ireland, *supra* note 165.

¹⁷⁹ *Contemporary Migration*, *supra* note 165.

¹⁸⁰ *Id.*

¹⁸¹ *See generally id.*

¹⁸² *See generally id.*

¹⁸³ Immigration Into Ireland, *supra* note 165.

Over the last twenty years, Ireland has enacted various statutes to suppress discrimination and racism in order to shield minorities from oppressive conduct.¹⁸⁴ The enactment of the Prohibition of Incitement to Hatred Act of 1989 intended to protect minorities in Ireland from individuals that attempted to spread racist messages.¹⁸⁵ This act prohibits using words, demonstrating behavior, or publishing or distributing materials that are threatening, abusive or insulting. Also, materials that have the propensity to initiate hatred are prohibited.¹⁸⁶ However, this Act was ineffective because prosecutors struggled in the application of this Act.¹⁸⁷ No single case prosecuted under this law has been upheld because prosecutors could never meet their burden of proving that the conduct incited hatred.¹⁸⁸ Irish judges were hesitant to rule in accordance with the statute because freedom of speech implications always arose.¹⁸⁹

The next form of significant Irish legislation to promote effective integration arrived in 1998.¹⁹⁰ The Equal Employment Act prevents employment discrimination on the basis of gender, marital status, family status, sexual orientation, religious beliefs, age, disability, and race.¹⁹¹ This statute offered specific protection for refugees employed in both the private and government sectors.¹⁹² Additionally, the Equal Status Act of 2000 prevents discrimination of goods, services, education, and property.¹⁹³ This act provides refugees with equal access to all public entities.¹⁹⁴ This would include access to restaurants, transportation, and entertainment.¹⁹⁵

¹⁸⁴ *See generally id.*

¹⁸⁵ *Id.*

¹⁸⁶ *First National Report by Ireland*, United Nations International Convention on the Elimination of All Forms of Racial Discrimination, at 10 (Stationary Office 2004) [hereinafter *First National Report*].

¹⁸⁷ *Id.*

¹⁸⁸ *See id.*

¹⁸⁹ *See id.*

¹⁹⁰ *Immigration Into Ireland*, *supra* note 165, at 16.

¹⁹¹ *Id.*

¹⁹² *Id.*

¹⁹³ *Id.*

¹⁹⁴ *Id.*

¹⁹⁵ *Id.*

In addition to significant legislation, the Irish government formed specific state agencies and committees with the sole intention of creating equality among all individuals living in Ireland.¹⁹⁶ The Office of the Director of Equality Investigations and the Equality Authority are assigned the task of enforcing the previously discussed anti-discriminatory and equality legislation.¹⁹⁷ These bodies investigate discrimination claims arising under Irish law.¹⁹⁸ Moreover, The National Consultative Committee on Racism and Interculturalism works to promote acceptance of a more multicultural Ireland.¹⁹⁹ Unlike the state agencies, this committee doesn't have statutory powers to either enforce or investigate claims.²⁰⁰ However, this committee has been effective in promoting public awareness of issues concerning discriminatory actions against asylum seekers and refugees.²⁰¹

A significant government project dedicated to the integration of refugees is The Access Ireland Project.²⁰² This project is primarily funded by the *European Union budget line on integration of refugees*.²⁰³ The goal of this Irish project is to pinpoint and popularize the positive contributions of refugees and the benefits in attaining a more multiculturalistic society in Ireland.²⁰⁴ Also, this project is dedicated to improving refugee access to health and social welfare services.²⁰⁵ Furthermore, the Irish officials guiding this project encourage non-

¹⁹⁶ Immigration Into Ireland, *supra* note 165.

¹⁹⁷ *Id.*

¹⁹⁸ *Id.*

¹⁹⁹ *Id.*

²⁰⁰ *Id.*

²⁰¹ *Id.*

²⁰² *Two Way Process*, *supra* note 24, at 19.

²⁰³ *Id.*; *The European Budget line on integration of refugees* is a fund established by the EU parliament that collects money that is later dispersed to member state to support their efforts concerned with effectively integrating refugees with the rest of the country's society.

²⁰⁴ *Two Way Process*, *supra* note 24, at 19.

²⁰⁵ *Id.*

discriminatory practices of refugee service providers through the development of specialized training programs.²⁰⁶

Another significant government project is the Zena project.²⁰⁷ The Zena Project has three broad goals.²⁰⁸ First, this project promotes a greater accessibility to education for refugee women.²⁰⁹ Second, Zena attempts to establish links among various refugee groups in Dublin.²¹⁰ Third, this project wants to achieve more in depth research of refugees in the form of surveys in order to discover present the needs and barriers facing refugees.²¹¹ The Zena Project and The Access Ireland project are only two of the many projects formed by the Irish government in the hopes of promoting multiculturalism in Ireland.²¹²

Female refugees pose unique problems for host countries.²¹³ Female refugees have a greater propensity to face discriminatory actions than male refugees.²¹⁴ The Irish government tackled these problems by establishing a Gender Equality Unit through the National Department of Justice, Equality, and Law Reform.²¹⁵ This group developed a National Development Plan (NDP) in order to provide awareness of the troubles that female refugees encounter.²¹⁶ This unit also promotes publications by Non-Government Organizations (NGOs) regarding gender specific issues.²¹⁷ Furthermore, in order to further public awareness, in 2001, Ireland created a National Anti-Racism Awareness Program entitled *Know Racism*.²¹⁸ This program is a nation wide marketing strategy consisting of media messages expressing positive feelings towards

²⁰⁶ *Id.*

²⁰⁷ *Id.* at 18.

²⁰⁸ *Id.*

²⁰⁹ *Id.* at 19.

²¹⁰ *Two Way Process*, *supra* note 24, at 19.

²¹¹ *Id.*

²¹² *See generally id.* at 17-20.

²¹³ *First National Report by Ireland*, *supra* note 186, at 10-11.

²¹⁴ *Id.*

²¹⁵ *Id.*

²¹⁶ *Id.*

²¹⁷ *Id.*

²¹⁸ *Id.* at 12.

multi-culturalism and diversity.²¹⁹ A pamphlet entitled *What can you do against Racism* was mailed to every residence in Ireland.²²⁰

The government also succeeded in its efforts to deter racism through the formation of a partnership with the farming sector, the community sector, and trade unions.²²¹ This agreement named *Sustaining Progress* encompasses issues relating to economic migration, the labor market, integration issues, racism, interculturalism, and the implementation of literacy and language training on behalf of adult minority linguistic groups.²²² These significant sectors of society are committed to joining their resources in order to provide a more culturally accepting state.²²³ As outlined above, the Irish government has made numerous sincere and good faith efforts to ensure effective integration.²²⁴

Non-government groups have made enormous attempts to assist asylum-seekers and refugees in Ireland.²²⁵ Before the government successfully formed a distinct integration plan, the private sector initiated the first efforts to integrate refugees and asylum seekers with the rest of Irish society.²²⁶ The funding originating from non-profit groups has been incredibly generous.²²⁷ These efforts combined with a solidified government policy will forward Ireland's attempts in achieving a unified and more culturally diverse society.²²⁸

VI. CHARACTERISTICS AND ATTRIBUTES OF REFUGEES

A. Historical Look at Contributions of Immigrants and Refugees to Host Countries

²¹⁹ *First National Report by Ireland*, *supra* note 186, at 12.

²²⁰ *Id.*

²²¹ *Id.* at 12, 47.

²²² *Id.*

²²³ *See generally id.*

²²⁴ *See generally id.*

²²⁵ *Contemporary Migration*, *supra* note 165.

²²⁶ *Id.*

²²⁷ *Id.*

²²⁸ *Immigration Into Ireland*, *supra* note 165, at 16.

In order to predict the manner in which refugees will affect the Irish economy, an analysis of the characteristics and attributes of refugees is required. Throughout history, immigrants, refugees, and asylum seekers have made significant contributions to their host countries.²²⁹ “Refugees . . . can enrich the society around them and contribute to the continued development of Ireland . . . by participating in the activities of the community and society, drawing on their own experiences, culture and background – just as Irish emigrants have done down through the years in other countries.”²³⁰

A comparison of immigration in the United States in the mid-nineteenth century can be examined to illustrate the present wave of asylum seekers entering Ireland.²³¹ Ireland was much like the U.S. before the U.S.’s period of mass immigration.²³² Both countries were mainly homogenous except of course for the presence of native-americans in the U.S.²³³ The mass wave of Irish immigrants into the United States (U.S.) resulted in various contributions to the U.S. infrastructure.²³⁴ These new faces arriving in the U.S. used their skills as masons and bricklayers to lead construction of American cities along the east coast.²³⁵ In addition, both African and Irish immigrants altered the shape of American sports and entertainment.²³⁶ Moreover, the most significant contributions of Italian immigrants in the U.S. can be seen almost a century after their arrival.²³⁷ In the private sector, Italian Americans have been moving into executive positions at some of the most prestigious U.S. companies.²³⁸ In the 1970s, Lee Iacocca, an Italian American

²²⁹ See generally MICHAEL BARONE, THE NEW AMERICANS: HOW THE MELTING POT CAN WORK AGAIN (Regnery Publishing, Inc. 2001).

²³⁰ *Two Way Process*, *supra* note 24, at 3.

²³¹ See BARONE, *supra* note 229.

²³² See *id.*

²³³ See *id.*

²³⁴ *Id.* at 34.

²³⁵ *Id.*

²³⁶ *Id.* at 48-49.

²³⁷ See BARONE, *supra* note 229, 146-148.

²³⁸ *Id.* at 148.

became the chief executive officer of Ford Motor Company.²³⁹ Also, Italian Americans made their presence known in the U.S government.²⁴⁰ Antonin Scalia, an Italian American, was confirmed as U.S. Supreme Court Justice in 1983.²⁴¹ By analyzing the wave of immigration into the U.S. in the mid-nineteenth century, one can predict the positive economic implications that can arise if Ireland continues to accept new faces in the form of refugees.²⁴²

B. Attributes of Specific Refugee Groups Entering Ireland

As discussed earlier the four largest groups presently entering Ireland, starting with the largest, are from Nigeria, Romania, The Democratic Republic of the Congo, and China.²⁴³ Recently, Nigerians have been Ireland's largest asylum seeking group for several reasons.²⁴⁴ First, violent crime is rampant in Nigeria.²⁴⁵ Ordinary citizens will pose as police and military in order to rob others.²⁴⁶ Also, kidnapping for ransom of persons involved in the oil industry has been prevalent.²⁴⁷ In addition, violence between Muslims and Christian communities can occur without warning, and rival ethnic groups have been known to violently clash in certain areas of Nigeria.²⁴⁸ Most refugees originating from Ireland are seeking asylum on the basis of non-state persecution or persecution by the Nigerian military.²⁴⁹

Despite the harsh reality of existence in Nigeria, many notable Nigerians have made significant contributions to the rest of the world in the areas of literature, entertainment, human

²³⁹ *Id.*

²⁴⁰ *See generally id.*

²⁴¹ *Id.*

²⁴² *See id.*

²⁴³ *Asylum-Seeker and Refugee Statistics, supra note 77.*

²⁴⁴ The United States Department of State, *Travel Warning: Nigeria*, at http://travel.state.gov/travel/cis_pa_tw/tw/tw_928.html (last visited March 6, 2005) [hereinafter *Travel Warning: Nigeria*].

²⁴⁵ *Id.*

²⁴⁶ *Id.*

²⁴⁷ *Id.*; See Obiora Chinedu Okafor, *Convention Refugeehood, Early Warning Signs, and the Structural Crisis of Legitimate Statehood in Contemporary Nigeria*, 9 BUFF. HUM. RTS. L. REV. 1, 6 (2003).

²⁴⁸ *Travel Warning: Nigeria, supra note 244.*

²⁴⁹ *Id.*

rights, and sports.²⁵⁰ Chinua Achebe, a famous Nigerian writer, was nominated for the Booker Prize for Literature, and he was later appointed the Goodwill Ambassador for the United Nations Population Fund.²⁵¹ Additionally, Wole Soyinka, another famous Nigerian writer, was the first African to win the Nobel Peace Prize for Literature in 1986.²⁵² Also, King Sunny Ade has made global contributions in the area of music.²⁵³ In 1999, he was nominated for Best World Music Album in the Grammy Awards. In the area of sports, two Nigerians, Hakeem Olajuwon and Michael Olowokandi, who later became U.S. citizens, have dominated their positions in the National Basketball League located in the U.S.²⁵⁴ From the discussion above, it seems obvious that Nigerians have numerous skills and attributes that could benefit host countries.²⁵⁵

Presently, Romanians constitute the second largest group of asylum seekers.²⁵⁶ Both the Romas²⁵⁷ and Jews have been the two main subgroups of Romanians seeking asylum in Ireland.²⁵⁸ Several political groups having racist and anti-semitic ideologies exist in the Romanian Parliament.²⁵⁹ The Greater Romania Party is considered the most anti-semitic among the parties.²⁶⁰ They encompass roughly 4.5% of the Romanian Senate.²⁶¹ The Romania Party of National Unity represents 4.3% of Romania's Parliament, and this party's racist views clearly

²⁵⁰ Motherland Nigeria, *Famous Nigerians Known Outside of Nigeria*, at <http://www.motherlandnigeria.com/famous.html> (last visited March 6, 2005) [hereinafter *Famous Nigerians*].

²⁵¹ *Id.*

²⁵² *Id.*

²⁵³ *Id.*

²⁵⁴ *Id.*

²⁵⁵ *See id.*

²⁵⁶ *Asylum-Seeker and Refugee Statistics*, *supra* note 77.

²⁵⁷ Romas are nomadic people who originated from Northern India, and they now live chiefly in south and southwest Asia, Europe, and North America. They have a distinct culture that has been subject to persecutory conduct for hundreds of years.

²⁵⁸ Tel-Aviv University Stephen Roth Institute, Anti-Semitism and Racism, *Anti-Semitism Worldwide - Romania*, at <http://www.tau.ac.il/Anti-Semitism/asw98-9/romania.html> (last visited March 6, 2005) [hereinafter *Anti-Semitism*].

²⁵⁹ *Anti-Semitism*, *supra* note 258.

²⁶⁰ *Id.*

²⁶¹ *Id.*

make it an extremist party.²⁶² *Romania Mare* is a political group that leads a slander campaign against the Roma.²⁶³ It publishes articles listing the crimes Romas commit in order to encourage negative public perceptions of the Roma.²⁶⁴ Due to the persecution motivated by racist groups, both Jewish and Roma individuals have difficulty sustaining a normal lifestyle in Romania.²⁶⁵ These individuals come from all types of professional backgrounds, and many of them have attained noteworthy academic achievements.²⁶⁶ Many of these persecuted asylum seekers would be an asset to host countries.²⁶⁷

Asylum seekers from The Democratic Republic of Congo (DRC) may emerge as the largest group of asylum seekers seeking refuge in Ireland over the next ten years.²⁶⁸ After seventy-five years of colonial rule in the Congo, in the 1960s, the Belgians abruptly left the area while hastily transferring control to the people of the Congo.²⁶⁹ Economic exploitation resulting in a twelve billion dollar national debt and a war for political power in the region has caused an estimated 3.3 million deaths, and more than 2.5 million others have been displaced from their homes.²⁷⁰ In addition, neighboring Rwanda is a country controlled by a hostile dictatorship. Soldiers in Rwanda have launched military attacks on the DRC in order to gain control of diamond mines and other valuable minerals located within the border of DRC.²⁷¹

²⁶² *Id.*

²⁶³ *Id.*

²⁶⁴ *Id.*

²⁶⁵ See *Anti-Semitism*, *supra* note 258.

²⁶⁶ See *id.*

²⁶⁷ See *id.*

²⁶⁸ Anup Shah, *Conflicts in Africa: The Democratic Republic of Congo*, at <http://www.globalissues.org/Geopolitics/Africa/DRC.asp> (last visited March 6, 2005); The United States Department of State, *Travel Warning: Congo-Kinshasa*, at http://travel.state.gov/travel/cis_pa_tw/tw/tw_916.html (last visited March 6, 2005).

²⁶⁹ Shah, *supra* note 268.

²⁷⁰ *Id.*

²⁷¹ *Id.*

The people of the DRC seeking refugee status in Ireland have various attributes that will significantly benefit Irish society.²⁷² Eventually the DRC will become a stable country because foreign countries will be willing to help this area of the world due to the presence of valuable resources and minerals.²⁷³ When help inevitably arrives, DRC will look for international trading partners.²⁷⁴ If Ireland continues to accept asylum seekers from the DRC, Ireland will gain an economic reward in the form of lucrative trading with DRC.²⁷⁵ Ireland will be able to initiate trade with the DRC because refugees residing in Ireland will provide a link between Ireland and DRC.²⁷⁶ The refugees from DRC residing in Ireland have the common heritage and linguistic abilities to negotiate and encourage trade with DRC government officials.²⁷⁷ As discussed above, Ireland's continued willingness to open its doors to asylum seekers seeking protection in Ireland will result in long-term economic benefits for Ireland through the increase of international trade with non-EU countries, specifically DRC.²⁷⁸

Asylum seekers originating from China will continue to be one of the largest groups seeking asylum in Ireland.²⁷⁹ "Decades of political persecutions, social chaos, economic privation and international isolation . . ." ²⁸⁰ has caused Chinese to flee their homelands.²⁸¹ Refugees from China seeking haven in less industrialized countries such as Cambodia are facing fears that they will be deported back to China to endure punishment from the Chinese

²⁷² *See id.*

²⁷³ *See generally id.*

²⁷⁴ *See id.*

²⁷⁵ *See Shah, supra note 268.*

²⁷⁶ *See id.*

²⁷⁷ *See id.*

²⁷⁸ *See id.*

²⁷⁹ Jeffrey W. Grove, *China Law Symposium Introductory Essay: Tracking the Dragon*, 6 *IND. INT'L & COMP. L. REV.* 319, 321 (1996).

²⁸⁰ *Id.* at 321.

²⁸¹ *Id.*

government.²⁸² Chinese officials are manipulating political cooperation from these countries to hunt down refugees with political thoughts adverse to the Chinese government.²⁸³ These refugees are seeking relocation to safer countries, such as Ireland, through the help of the United Nations.²⁸⁴

Refugees from China will bring forward thinking ideas and innovative ideas to Irish society.²⁸⁵ These characteristics are illustrated by many of these refugees' political stance against the Chinese government.²⁸⁶ Refugees from China have courageously squared off against the Chinese government in hopes of establishing basic civil rights for Chinese citizens.²⁸⁷ Furthermore, Chinese have contributed to host countries in the areas of engineering and the sciences.²⁸⁸ According to a U.K. study, an astounding 20% of refugees from the far east entering the U.K. have attained sixteen years or more of formal education.²⁸⁹ Additionally, in the U.S, Chinese students have outscored their American colleagues on standardized tests.²⁹⁰ This group is characterized as highly motivated and this has resulted in their attainment of high levels of education.²⁹¹

C. Present Studies Reporting Skills of Refugees

Since the U.K. and Ireland receive similar groups of refugees, an analysis of U.K. studies and reports is beneficial in understanding the skills of refugees in Ireland.²⁹² A recent survey

²⁸² Maureen Zebian, *Chinese Refugees Running Scared*, THE EPOCH TIMES, Feb. 4, 2004, available at <http://english.epochtimes.com/news/4-2-20/1995.html>.

²⁸³ *Id.*

²⁸⁴ *Id.*

²⁸⁵ Grove, *supra* note 279.

²⁸⁶ *See id.*

²⁸⁷ *See generally id.*

²⁸⁸ BARONE, *supra* note 229, at 264.

²⁸⁹ Rachel Kirk, Skills Audit of Refugees, Home Office Online Report 37/04 at 15.

²⁹⁰ BARONE, *supra* note 229, at 265.

²⁹¹ *Id.*

²⁹² Association of London Government, *Equalities Circular no. 34*, April 7, 2004 [hereinafter London Government].

highlighted positive refugee roles in the U.K.²⁹³ Similar to Ireland’s labor market, U.K firms have begun hiring refugees in order to compensate for labor shortages.²⁹⁴ In this survey, firm executives “. . . praised the commitment, strong work ethic and high productivity that refugees brought to their jobs.”²⁹⁵ Moreover, the U.K. has developed a program to integrate refugee skills into the workforce by creating refugee nurses.²⁹⁶ Dr. Narendra Makanji is Chairman of the Whittington Hospitals Trust, and this hospital has 2,500 employees.²⁹⁷ In regards to refugee employees, Dr. Makanji stated, “[w]e are very aware of the contribution which refugee professionals make to our work and our institution . . . [t]heir contribution is a very positive one[.]”²⁹⁸

In 2004, the U.K. released its largest ever skills audit of refugees.²⁹⁹ This audit illustrated that refugees are equipped with valuable skills and experience that are beneficial to the host country.³⁰⁰ The awareness of these skills by the citizens of the host nation could encourage a positive public perception of refugees resulting in effective integration.³⁰¹ The U.K. reported that 30% of its refugees had attained the equivalent of a university degree.³⁰² This report also suggested that approximately half of refugees were economically active before arriving in the U.K., characterizing the refugees demographic as an enterprising group.³⁰³ In addition, the economic activity rates of refugees were similar to that of the rates of U.K.’s own citizens.³⁰⁴

²⁹³ See generally Kirk, *supra* note 289.

²⁹⁴ London Government, *supra* note 292.

²⁹⁵ *Id.*

²⁹⁶ Employability Forum, *Integrating Refugees Skills into the Workforce-a Strategy for Refugee Nurses: Strategy and Conference Report*, July 19, 2004 [hereinafter *Integrating Refugees Skills*].

²⁹⁷ *Id.* at 1.

²⁹⁸ *Id.*

²⁹⁹ Kirk, *supra* note 289, at 1.

³⁰⁰ *Id.* at 23.

³⁰¹ *Id.*

³⁰² Employability Forum, *The Untapped Workforce: A Guide to Employing Refugees*, available at <http://www.employabilityforum.co.uk> [hereinafter *The Untapped Workforce*].

³⁰³ Kirk, *supra* note 289, at 23.

³⁰⁴ *Id.* at 21.

This notion demonstrates that even though refugees come from less industrialized nations, they have attained equal and similar skills as citizens from host countries.³⁰⁵ Lord Limerick, Chairman of Employability Forum, stated that “[r]efugees are ‘ordinary people in extraordinary circumstances’. We have benefited greatly from the contribution which they have made in many areas – in the business community, medicine, scholarship, education and in the arts, to name but some.”³⁰⁶

In 2005, the private sector within the U.K. published its own findings concerning asylum seeker and refugee skills.³⁰⁷ This audit was designed by the private sector to provide a snapshot of the educational and employment experience of asylum seekers and refugees residing in the U.K.³⁰⁸ Of 193 respondents that gave information regarding previous employment in their native lands, 23% were in skilled trades, 18% ran their own business, 15% worked in professional occupations, and 10% worked in associated professional and technical fields.³⁰⁹ This audit clearly demonstrates that the negative perceptions of refugees as individuals that have been employed as unskilled workers due to their lack of education is wrong.³¹⁰ Furthermore, this study shows that many refugees come from highly educated backgrounds, many of which have been employed in highly technical fields.³¹¹

VII. IRELAND’S ECONOMY

A. *Economic History*

³⁰⁵ *See id.*

³⁰⁶ *The Untapped Workforce*, *supra* note 302; The Employability Forum is an independent charity that promotes the employment of refugees in the U.K.

³⁰⁷ Jules Harrison & Emma Read, *Asylum Seeker and Refugee Skills Audit: An Audit of Skills Amongst Asylum Seekers and Refugees*, Northwest Regional Development Agency, Jan. 2005.

³⁰⁸ *Id.* at 3.

³⁰⁹ *Id.* at 2.

³¹⁰ *See id.*

³¹¹ *See id.*

In order to effectively examine how refugees' contributions will positively affect Ireland's economy, an analysis of Ireland's economic history is required. Asylum seekers have only recently targeted Ireland seeking refugee status due to its recent economic success.³¹² Before one can understand the role in which refugees will play in Ireland's new economic structure, one must become familiar with the transformation of Ireland's economy into the economic envy of the EU.³¹³ Ireland's economic history is plagued with poverty and deprivation.³¹⁴ Oppression by the British from the 16th century to the 20th century slowly suffocated the island.³¹⁵ By the early 1900s, large numbers of Irish emigrated from Ireland seeking financial stability and possibly survival.³¹⁶ Immediately after Ireland gained independence from England in 1921, a civil war disrupted all hopes of solidifying an economic policy.³¹⁷

During the early part of the 20th century, asylum seekers and immigrants were not interested in residing in Ireland because of Ireland's poor economic state and its unwillingness to open itself to foreign influences.³¹⁸ In 1932, Eamon de Valera was elected to the head of state, and he regretfully maintained this position until the 1950s.³¹⁹ Valera constructed an economic policy that was blind to international trade and foreign investment.³²⁰ He envisioned Ireland as a self-sufficient state that would rely solely its own resources and products.³²¹ These policies

³¹² See generally Breffni O'Rourke, *How Ireland unleashed its 'Celtic Tiger' Economy*, EU BUSINESS, Nov. 26, 2001, available at <http://www.eubusiness.com>.

³¹³ See generally *id.*

³¹⁴ *Id.*

³¹⁵ See *id.*

³¹⁶ See *id.*

³¹⁷ Meredith J. Coleman, *Comment: The Republic of Ireland's Economic Boom: Can the Emerald Isle Sustain its Exponential Growth*, 21 U. PA. J. INT'L ECON. L. 833, 836 (2000).

³¹⁸ See *id.*

³¹⁹ See *id.*

³²⁰ See *id.*

³²¹ See *id.*

pushed Ireland into a depression until 1938.³²² “[I]ndustrial exports fell by one-third and farm exports by almost half[,]” and these trends continued until the 1950s.³²³ In the 1950s, 400,000 individuals emigrated out of Ireland’s population of less than 3 million due to financial hardship.³²⁴

In the middle of the 20th century, asylum seekers and immigrants would begin to notice Ireland as a possible option for residence due to Ireland’s shift in domestic policy.³²⁵ In 1958, Ireland shifted from a policy of protectionism to an open market through the implementation of the Economic Development Programme (EDP).³²⁶ This program attracted foreign capital.³²⁷ Furthermore, Ireland entered the Anglo-Irish Trade Agreement in 1965.³²⁸ Similar to the EDP, this agreement initiated an increase in foreign investment.³²⁹ By the 1960s, Ireland was considered an industrialized country thanks to the arrival of foreign industry.³³⁰ However, domestic businesses collapsed because they were unable to compete with these more sophisticated foreign bodies.³³¹ Unemployment skyrocketed due to the weakened state of the clothing, textile, and chemical industries.³³² In an attempt to repair these problems, Ireland attempted to diversify trade away from the U.K. and towards the rest of Europe.³³³

³²² *See id.*

³²³ *See Coleman, supra note 317.*

³²⁴ Frank Barry, *Irish Economic Development over Three Decades of EU Membership*, University College Dublin at 2.

³²⁵ *See* Julie Hyland, *What Makes the Celtic Tiger Run*, WSWS, June 16, 1998, at <http://www.wsws.org>.

³²⁶ *Id.*

³²⁷ *See id.*

³²⁸ *See id.*

³²⁹ *See id.*

³³⁰ *See id.*

³³¹ *See* Hyland, *supra note 325*.

³³² *See id.*

³³³ *See id.*

Due to a significant act by the Irish government, the Irish doors to the acceptance of refugees and immigrants finally began to creak open.³³⁴ In 1973, Ireland joined the European Economic Community (EEC).³³⁵ Membership to this group permitted the free flow of goods and services between member states of the EU.³³⁶ This allowed Ireland to increase trade with European countries while diminishing its reliance on trade with the United Kingdom.³³⁷ However, the unemployment rate steadily increased over the next decade to a level of 17%.³³⁸ By the mid 1980s, the inflation rate exceeded 10%, and the average deficit was 7% higher than the gross domestic product (GDP).³³⁹ This recession continued until 1987 when the country's economic situation started to slowly improve.³⁴⁰ In the early 1990s, a long awaited blessing arrived through the birth of the Celtic Tiger.³⁴¹

B. The Celtic Tiger

The incredible economic growth over the previous ten years has caused economists to refer to Ireland as the Celtic Tiger.³⁴² As discussed later, the growing pains of the Celtic Tiger would call for refugees to play a pivotal role in satisfying the demands of Ireland's massively expanding market.³⁴³ In the late 1990s, figures showed that Ireland's annual growth rate consistently exceeded 12%.³⁴⁴ From the beginning of the 1990s, foreign entities continued to

³³⁴ See Michael Busby, *Luck of the Irish: Ireland has Become the Technological Wonderland of the European Union*, 11 CURRENTS INT'L TRADE L.J. 55, 57 (2002).

³³⁵ *Id.*

³³⁶ *Id.*

³³⁷ *Id.*

³³⁸ Coleman, *supra* note 317, at 836.

³³⁹ *Id.*

³⁴⁰ *Id.*

³⁴¹ *Id.*

³⁴² Ben Powell, *The Celtic Tiger*, TECH CENTRAL STATION, Sept. 10, 2002, at www.techcentralstation.com.

³⁴³ Ben Hoosen, *Ireland's Recruiters Cast a Russian Net*, THE ST. PETERSBURG TIMES, Aug. 28, 2001, available at http://www.sptimesrussia.com/archive/times/6997sb/s_4456.htm.

³⁴⁴ JACKSON, *supra* note 1, at 416.

increase its investments in Ireland.³⁴⁵ This increase, combined with the newly established single European Union market, turned Ireland into an overnight economic miracle.³⁴⁶

In particular, American companies were attracted to Ireland for numerous reasons.³⁴⁷ The Irish government drastically lowered corporate tax rates, and this allowed American businesses to achieve greater profit margins by establishing manufacturing plants on the island.³⁴⁸ Also during this period, the European Union created a single market allowing for free trade among member states.³⁴⁹ American companies that established offices in Ireland had access to all of the 300 million people residing within the borders of the EU.³⁵⁰ Furthermore, due to the lack of language barriers, Irish and American companies were able to effectively communicate, “. . . and it helped that some 40 million Americans trace their ancestry at least in part to Ireland.”³⁵¹ American companies that have established offices and plants in Ireland include Dell, IBM, and Hewlett Packard.³⁵² In 2001, Ireland’s foreign investment exceeded \$17 billion, and the U.S. contributed to more than half of this total.³⁵³ As discussed later, the arrival of form companies and the expansion of industry would cause labor shortages that would be partially satisfied by refugees and immigrants.³⁵⁴

Due to American contributions and Ireland’s educated workforce, Ireland has become a haven to the technology industry for both domestic and foreign companies.³⁵⁵ Ireland leads the

³⁴⁵ See generally O’Rourke, *supra* note 312.

³⁴⁶ See generally *id.*

³⁴⁷ See generally *id.*

³⁴⁸ See generally *id.*

³⁴⁹ See generally *id.*

³⁵⁰ See generally *id.*

³⁵¹ See generally O’Rourke, *supra* note 312.

³⁵² See *id.*

³⁵³ See *id.*

³⁵⁴ See Hoosen, *supra* note 343.

³⁵⁵ Coleman, *supra* note 317, at 852.

rest of Europe in software exports.³⁵⁶ Intel placed its largest manufacturing plant outside the U.S. in Ireland.³⁵⁷ This \$2.5 billion plant produces the Pentium III chip.³⁵⁸ The Irish government has been successful in promoting the growth of the high tech industry.³⁵⁹ In 1999, the National Digital Park was established in Dublin.³⁶⁰ This Park is the center for communications and e-commerce trade for Europe.³⁶¹

Similar to the technology industry, Ireland has become the home to Europe's pharmaceutical industry.³⁶² Irish officials have termed pharmaceuticals as the engine of the economy.³⁶³ Internationally renowned pharmaceutical companies such as Johnson & Johnson and Beecham have placed plants in Ireland.³⁶⁴ With considerable financial support from the European Union and American investment, the Irish have been able to lead Europe in these lucrative industrial sectors.³⁶⁵ However, this economic boom has endured labor shortages that exist in numerous sectors of the Irish economy.³⁶⁶ Moreover, refugees can act as valid resources that could be used to remedy the labor shortage problem and allow Ireland's economic growth to continue.³⁶⁷

VIII. CURRENT REFUGEE POLICY WILL RESULT IN LONG-TERM ECONOMIC BENEFITS

A. Ireland's Liberal Stance in Granting Refugees Citizenship

³⁵⁶ *Id.*

³⁵⁷ *Id.* at 853.

³⁵⁸ *Id.*

³⁵⁹ *Id.* at 855.

³⁶⁰ *Id.* at 854.

³⁶¹ Coleman, *supra* note 317, at 854.

³⁶² *Id.* at 856.

³⁶³ *Id.*

³⁶⁴ *Id.* at 856.

³⁶⁵ *See generally id.*

³⁶⁶ *See generally* Immigration Into Ireland, *supra* note 165.

³⁶⁷ *See generally id.*

Under the 1951 Geneva Convention Relating to the Status of Refugees, asylum seekers granted refugee status are only allowed to remain in the host country for a temporary period.³⁶⁸ If the fear of persecution is removed due to a change in circumstances in the refugee's native country, this Convention requires the refugee be returned to his or her country.³⁶⁹ However, if circumstances never change, then the refugee is allowed to remain in the host country indefinitely.³⁷⁰ Long-term economic benefits resulting from Ireland's acceptance of refugees is undermined if the majority of refugees are returned to their homeland after only a short stay.³⁷¹ A strict naturalization policy for refugees would be an economic burden for Ireland because Ireland would endure great expenses in accepting and integrating refugees, and Ireland would not receive economic benefits resulting from refugees' permanent presence in Irish society.³⁷² However, refugees are able to attain Irish citizenship easily due to Ireland's liberal naturalization policies for refugees.³⁷³

Generally, the Irish government requires a refugee to reside in Ireland for at least five years before attaining citizenship.³⁷⁴ In many scenarios, the government will waive the five-year requirement and approve applications for naturalization if the individual has resided in Ireland for more than three years.³⁷⁵ Ireland developed a liberal citizenship policy in order to facilitate effective integration of refugees into Irish society.³⁷⁶ "By granting citizenship, the refugee's membership of society is acknowledged and this can be crucial to successful resettlement."³⁷⁷

³⁶⁸ *The Asylum Process*, *supra* note 10.

³⁶⁹ *Id.*

³⁷⁰ *Id.*

³⁷¹ *See Two Way Process*, *supra* note 24, at 15, 32.

³⁷² *See id.*

³⁷³ *Id.*

³⁷⁴ *Id.* at 15.

³⁷⁵ *Id.*

³⁷⁶ *Id.* at 32.

³⁷⁷ *Two Way Process*, *supra* note 24, at 32.

Citizenship will make the refugees feel more like a permanent part of Irish society.³⁷⁸ Refugees granted citizenship become more aware of their long-term economic roles in Ireland, and the long-term economic benefits of these individuals will finally be permanently secured by Ireland through naturalization.³⁷⁹ However, obtaining citizenship for numerous refugees may not be the ideal manner of securing permanent residency in Ireland because some countries require individuals to relinquish their former citizenship after obtaining citizenship in another country.³⁸⁰

B. Labor Demands

At the turn of the century, Ireland developed growing pains when its economic boom faced a possible meltdown due to a labor shortage.³⁸¹ Ireland's government formalized recruiting strategies to attract both skilled and unskilled laborers to the island.³⁸² One of the strategies involved creating a *Jobs Ireland Program* in hopes of bringing back individuals with Irish heritage that had emigrated as far back as the potato famine in the 1840s.³⁸³ This strategy only provided the labor market with half of the approximately 200,000 extra workers needed by 2004.³⁸⁴ As seen through the previous discussion of refugee attributes, refugees, asylum seekers, and immigrants are competent individuals that can play a major role in satisfying Ireland's labor demands.³⁸⁵

Additionally, refugees both fill jobs and make jobs.³⁸⁶ As previously discussed, many refugees and asylum seekers are educated individuals that have past experience in highly

³⁷⁸ *Id.*

³⁷⁹ *Id.* at 15, 32.

³⁸⁰ *Id.* at 32.

³⁸¹ See Hoosen, *supra* note 343; see also Immigration Into Ireland, *supra* note 165; see also CULLEN, *supra* note 4, at 3.

³⁸² Hoosen, *supra* note 343.

³⁸³ *Id.*

³⁸⁴ *Id.*

³⁸⁵ See *id.*

³⁸⁶ SIMON, *supra* note 7, at 252.

technical fields.³⁸⁷ These refugees could satisfy labor demands in Ireland's technical and pharmaceutical fields.³⁸⁸ Also, refugees and immigrants have a propensity to open small businesses that employ both natives and non-natives.³⁸⁹ This propensity to create self started businesses would ease the burdens on the Irish government to establish integration programs because refugees and immigrants would be mentored and integrated by non-native business owners that had previously arrived in Ireland.³⁹⁰ In most economies, small businesses are the most important source of new jobs.³⁹¹ According to this theory, refugees would not only ease the labor shortage in Ireland, but they would initiate an even greater expansion of the Irish economy.³⁹²

C. Increased Trade with Non-EU Countries

In 2004, Ireland's trade with non-EU countries marginally decreased.³⁹³ Exports of organic chemicals and computers decreased by 16% and 21% respectively.³⁹⁴ As less industrialized non-EU countries begin to develop, these non-EU countries will turn towards countries like Ireland in order to be provided with valuable products and goods.³⁹⁵ Through the acceptance of refugees, Ireland is indirectly developing relationships with these less industrialized non-EU countries.³⁹⁶ When these countries begin looking for an exporting nation, Ireland will have resources in the form of refugees that will enter negotiations and create deals with these countries.³⁹⁷ Ireland's refugees will have the ability to communicate in their native

³⁸⁷ See Harrison & Read, *supra* note 307.

³⁸⁸ See *id.*

³⁸⁹ SIMON, *supra* note 7, at 252.

³⁹⁰ See *id.*

³⁹¹ *Id.*

³⁹² See *id.*

³⁹³ *Trade with Non-EU Countries*, *supra* note 8, at 1.

³⁹⁴ *Id.*

³⁹⁵ See JACKSON, *supra* note 1; see also *Trade with Non-EU Countries*, *supra* note 8.

³⁹⁶ See JACKSON, *supra* note 1; see also *Trade with Non-EU Countries*, *supra* note 8.

³⁹⁷ See JACKSON, *supra* note 1; see also *Trade with Non-EU Countries*, *supra* note 8.

languages with officials from their native countries.³⁹⁸ This will create a connection with non-EU countries so that Ireland will be able to increase trade with non-EU countries through the creation of economic partnerships with refugees' native countries.³⁹⁹

IX. CONCLUSION

Ireland has been blessed over the last ten years through the arrival of the Celtic Tiger.⁴⁰⁰ With continued foreign investment targeting the Emerald Isle, it appears that the Celtic Tiger's presence will remain in Ireland for future decades.⁴⁰¹ However, in order for this economic growth to continue, Ireland needs two guarantees. First, Ireland must increase its trade with non-EU countries.⁴⁰² Second, Ireland must satisfy labor demands caused by the growing pains of rapid economic growth.⁴⁰³ As discussed in this comment, Ireland's continued acceptance of refugees can help satisfy these two economic demands.

Both government and non-government efforts have been successful in integrating refugees with the rest of society while achieving a more diversified Ireland.⁴⁰⁴ As mentioned earlier, the largest groups entering Ireland as asylum seekers have significant attributes that will be deciding factors in the longevity of the Celtic Tiger.⁴⁰⁵ Due to Ireland's liberal naturalization policies, refugees can attain citizenship and their economic contributions to the Irish economy can be preserved.⁴⁰⁶ Ireland's government's further acceptance of refugees will have a positive effect on the Irish economy.

³⁹⁸ See JACKSON, *supra* note 1; see also *Trade with Non-EU Countries*, *supra* note 8.

³⁹⁹ See JACKSON, *supra* note 1; see also *Trade with Non-EU Countries*, *supra* note 8.

⁴⁰⁰ Powell, *supra* note 342.

⁴⁰¹ See generally O'Rourke, *supra* note 312.

⁴⁰² See JACKSON, *supra* note 1; see also *Trade with Non-EU Countries*, *supra* note 8.

⁴⁰³ Hoosen, *supra* note 343.

⁴⁰⁴ *Contemporary Migration*, *supra* note 165; see also *Immigration Into Ireland*, *supra* note 165.

⁴⁰⁵ See *Famous Nigerians*, *supra* note 250; see also Shah, *supra* note 268; see also Grove, *supra* note 279.

⁴⁰⁶ See *Two Way Process*, *supra* note 24, at 15, 32.

Several questions exist in regards to the manner in which Ireland should open its arms to asylum seekers. Most importantly, the Irish government must decide the number of refugees it is willing to accept. If Ireland's population becomes diluted with non-natives, then it's possible that Ireland will lose its own identity and culture. Ireland must only accept the minimum number of refugees to fulfill the demands of the Celtic Tiger. Presently, these numbers are incredibly high, but Ireland's government must be conscious in not over burdening the system because over acceptance could have an adverse effect on Ireland's economy.

Ireland has been successful in accepting refugees because it has steadily increased its numbers of refugees while monitoring possible effects on its economy. By steadily increasing numbers of accepted asylum seekers, Ireland's government can maintain a close watch on the economic ramifications. Presently, Ireland must continue gradually granting asylum seekers refugee status because refugees play a significant role in promoting growth of the Irish economy.

For hundreds of years, the Irish have consistently fled the Emerald Isle and arrived in unfamiliar surroundings while influencing foreign cultures with their own.⁴⁰⁷ Ironically, the Irish are now the hosts of new faces and diverse cultures. Moreover, the Irish should remain sensitive to the concerns of refugees because the Irish should know how it feels to be treated as a new arrival in an unfamiliar land.

⁴⁰⁷ See generally JACKSON, *supra* note 1.