

Feedback Submission to the Department of Justice, Home Affairs and Migration

Re: Feedback on Non-EEA Family Reunification (November 2025 & June 2026)

Date: Friday, 26th June 2026

Executive Summary

Migrant Rights Centre Ireland (MRCI) welcomes the commitment by the Department of Justice to review the Non-EEA Family Reunification Policy Document annually. We also welcome the opportunity to provide feedback on the revised Policy Document published on 26 November 2025. While we acknowledge the policy provides a framework for family reunification, we are deeply concerned that its structure and financial thresholds continue to deny thousands of full-time migrant workers the most basic of human rights: the right to live with their families.

The policy, as currently drafted, creates a two-tier system that discriminates against essential workers: the people caring for our elderly, growing our food, building our homes, and staffing our healthcare system. These workers were recruited to fill roles the State could not fill domestically, yet they are penalised for the very wages the State deemed acceptable when permitting their employment.

This submission sets out MRCI's concerns across five areas:

- The right to family and private life under domestic and international law
- The rights of migrant workers
- The mental health and wellbeing of separated workers and their children
- The economic impact on workers, families, and the State
- Specific policy recommendations for reform

Our submission is grounded in MRCI's direct casework with thousands of migrant workers, survey data from General Employment Permit (GEP) holders, and international comparative evidence. It is further supported by worker testimony gathered through a dedicated survey conducted in April 2026, as well as

endorsements from civil society organisations, trade unions, and employer bodies across Ireland. A selection of these perspectives is included throughout this document and a full list of those who endorse the key asks of MRCI are included below:

Civil Society Organisations

- Africa Solidarity Centre Ireland
- AkiDwA - Network of Migrant Women
- CWI - Community Work Ireland
- Cultúr
- Doras
- European Anti-Poverty Network (EAPN)
- Immigrant Council of Ireland
- Irish Council for Civil Liberties (ICCL)
- Irish National Organisation of the Unemployed (INOUE)
- Irish Network Against Racism (INAR)
- MNI (Migrant Nurses Ireland)
- NASC - Migrant and Refugee Rights
- National Women's Council of Ireland (NWCII)
- National Youth Council of Ireland
- Nevin Economic Research Institute (NERI)
- The Society of St Vincent de Paul
- The Family Resource Centre National Forum

Workers' Rights and Trade Union Organisations

- Communications Workers' Union (CWU)
- ForSa
- Independent Workers' Union (IWU)
- Irish Congress of Trade Unions (ICTU)
- Irish Nurses and Midwives Organisation (INMO)
- SIPTU
- Unite the Union

Employers

- Business in the Community Ireland (BITCI)
- MWeds Global Advisory
- Restaurant Association of Ireland (RAI)
- The Great Care Cooperative

Policy Changes

The revised Non-EEA Family Reunification Policy introduced on 26 November 2025 represents a significant tightening of an already restrictive framework. While the previous (2016) policy imposed substantial barriers, the 2025 changes further narrow eligibility and increase the evidential burden on sponsors. The definition of “family” has been restricted, with children aged 18-23 in full-time education no longer considered part of the nuclear family, and adult dependent children now only eligible in exceptional circumstances. This substantially limits the ability of workers to reunite with older children and extended family members, reinforcing a highly constrained model of family life.

In addition, the revised policy introduces more stringent financial and administrative requirements that disproportionately affect low paid workers. Higher income thresholds, the requirement that only one sponsor’s income be considered, and the introduction of accommodation and documentation requirements collectively raise the bar for eligibility. Taken together, the 2025 reforms mark a shift towards a more restrictive, income-driven model of family reunification that places greater obstacles in the way of low- and middle-income migrant workers, exacerbating existing barriers rather than addressing them.

Key Ask: Expand Category A to Include All Full-Time Workers

MRCI calls on the Department of Justice to include all Stamp 1 (including GEP holders) and Stamp 4 holders in full-time employment in Category A. This single reform would remove discriminatory waiting periods and unachievable income

thresholds, enabling all essential workers to live with their families from the start of their employment in Ireland.

1. Human Rights Concerns

The right to family life is not a privilege - it is a fundamental human right enshrined in a range of international instruments that Ireland has ratified and is obliged to respect.

1.1 International and European Human Rights Obligations

Article 8 of the European Convention on Human Rights (ECHR) guarantees the right to respect for private and family life. While this right may be subject to limitations in the interests of national security or immigration control, any such interference must be proportionate and necessary. The current policy's blanket 12-month waiting period for Category C workers, combined with processing times of 18-24 months, imposes a minimum two-year separation that is neither proportionate nor individually assessed.

The UN Convention on the Rights of the Child (CRC), which Ireland has ratified, is especially relevant. Articles 9 and 10 of the CRC require that:

- Children should not be separated from their parents except where it is in their best interests
- Applications for family reunification must be handled positively, humanely, and expeditiously
- States must ensure the child's best interests are a primary consideration in all decisions affecting children

Ireland's built-in structural delays are inconsistent with these obligations. The UN Committee on the Rights of the Child raised similar concerns in its 2023 recommendations. The current policy does not include any individualised best interests of the child assessment - an omission that creates legal risk and inflicts predictable harm on children.

“Under article 10 of the Convention on the Rights of the Child, States parties are to ensure that applications for family reunification are dealt with in a positive, humane and expeditious manner, including facilitating the reunification of children with their parents. When the child’s relations with his or her parents and/or sibling(s) are interrupted by migration (in both the cases of the parents without the child, or of the child without his or her parents and/or sibling(s)), preservation of the family unit should be taken into account when assessing the best interests of the child in decisions on family reunification.” - UN Committee on the Rights of the Child (CRC) & UN Committee on Migrant Workers (CMW), Joint General Comment No. 23 (2017), Paragraph 32.

1.2 Discrimination Between Permit Categories

The most fundamental rights concern in this policy is the discriminatory treatment of migrant workers based on their permit category rather than the substance of their family life or work. A Critical Skills Employment Permit (CSEP) holder may immediately bring their family to Ireland, while a General Employment Permit (GEP) holder - earning a State-sanctioned wage in a State-identified shortage occupation - must wait at least two years before their family can join them. In fact, a CSEP holder earning €45,000 can bring unlimited family members, whereas a GEP holder earning the same cannot bring even one child.

This distinction has no principled basis in human rights law. The State seems to be saying a salary threshold is needed for some migrant workers but not for others even if they are earning less. There is no rationale provided for this and it therefore amounts to a discrimination against workers in certain sectors. If the State is saying we do not need to apply a threshold to a software developer because we want them here, why is the same logic not applied to a carer in a nursing home.

“...the government [should] consider that carers/ general work permit holders are also doing critical job and allow us to bring our families swiftly like critical skills holders.” comment by healthcare worker with two children (April 2026)

2. Workers' Rights

The Department of Justice's family reunification policy does not exist in isolation. It directly affects the employment rights and vulnerability of migrant workers in Ireland. MRCI believes this connection has been insufficiently considered in the current policy.

2.1 The Contradiction at the Heart of the Policy

The State simultaneously sets the minimum wage and GEP salary floors - determining what constitutes acceptable remuneration for full-time employment - and then uses these same wages as grounds for excluding workers from family reunification. The GEP minimum salary is considered enough to work in Ireland, pay taxes, and fill a labour shortage, but not enough to live with their children.

This is an internal contradiction in State policy that cannot be justified. If a salary is sufficient to admit a worker and enable them to live here, it should also be sufficient to allow them to live a normal life, just like anyone else. This includes having their immediate family with them - particularly where the income requirement analysis, set out below, demonstrates that the tax benefits of workers availing of family reunification would outweigh any benefit entitlements.

“The Irish Congress of Trade Unions supports MRCI’s call for reform of the Family Reunification policy. Workers who are contributing to Ireland, paying taxes, and filling essential roles should not be denied the right to live with their families because of unfair income thresholds and excessive delays. Prolonged separation causes serious stress and mental health impacts for workers and places an unacceptable burden on children and families.” **Irish Congress of Trade Unions (ICTU)**

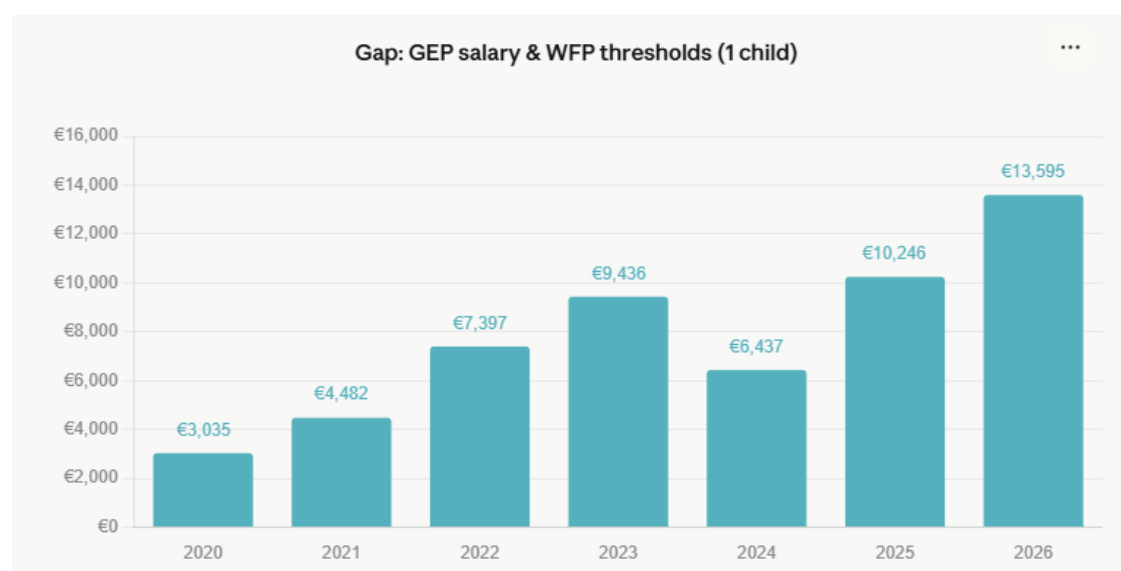
2.2 Waiting Periods and the WFP Income Thresholds

MRCI has conducted detailed analysis of the Working Family Payment (WFP) thresholds used to determine eligibility for family reunification with children. These

figures have increased dramatically in recent years and are now entirely unachievable for the majority of full-time workers:

Year	GEP Minimum Salary	WFP 1 Child Annual (approx. Gross)	WFP 2 Children (approx. Gross)
2020	€30,000	€33,035	€42,353
2021	€30,000	€34,482	€44,362
2022	€30,000	€37,397	€47,595
2023	€30,000	€39,436	€49,415
2024	€34,000	€40,437	€49,945
2025	€34,000	€44,246	€54,174
2026	€36,605	€50,200	€60,200

While salaries under the General Employment Permit (GEP) have increased by approximately **22% since 2020**, and the Consumer Price Index (CPI) has risen by **23%** in that time, the income thresholds linked to the Working Family Payment (WFP) have risen much more sharply. For example, the threshold for a household with one child has increased by **52% over the same period**.



This divergence is making family reunification increasingly unattainable for many migrant workers.

Survey data from the Migrant Rights Centre Ireland indicates that **99% of GEP holders are unable to meet the income requirement to sponsor even one child**.

Even a worker earning **€40,000 per year** - well above minimum wage - can fall significantly short of the threshold required to bring a single child to Ireland.

These thresholds therefore do not function as a reasonable financial safeguard.

Instead, they operate as a **structural barrier to family life** for an entire category of workers.

Limitations of the Working Family Payment benchmark

The reliance on WFP income thresholds as a proxy for financial capacity is a crude and inappropriate measure. WFP thresholds are designed to determine **eligibility for a supplementary welfare payment**, not to assess whether a household has sufficient income to live adequately.

In practice, this linkage appears to exclude the majority of migrant workers from accessing family reunification, rather than providing a fair or evidence-based assessment of affordability.

A fairer benchmark: Minimum Essential Standard of Living (MESL)

If the state insists on persisting with income thresholds then a more appropriate and evidence-based approach would be to link income requirements to the **Minimum Essential Standard of Living (MESL)**, developed by the Vincentian MESL Research Centre.

MESL defines the minimum income required for a household to live with dignity and participate in society, based on detailed, consensus-driven research on actual living costs in Ireland.

For an **urban (Dublin-type) household with one parent and one primary-school child**, MESL sets the minimum required income at:

- **€515 per week (net)**
- **€26,800 per year (net)**
- **Approximately €31,000 gross per year**

This represents the income necessary to achieve a **basic but acceptable standard of living**, covering not only essential needs but also minimum social participation.

There is an **almost €20,000 gap** between what MESL identifies as the minimum adequate income and the WFP income threshold currently used in family reunification policy.

This gap highlights a fundamental issue:

- **MESL measures what families need to live adequately**
- **WFP thresholds set a significantly higher bar unrelated to actual living costs**

As a result, current policy does not simply ensure financial stability-it sets income requirements at a level that is **disproportionate and exclusionary**, effectively preventing many low- and middle-income migrant workers from living with their families.

Using WFP thresholds within family reunification policy risks creating income barriers that are disconnected from lived economic reality. If the objective is to assess whether a worker can sustainably support family life in Ireland in a dignified fashion, then policy should be anchored in transparent, socially grounded measures such as MESL rather than arbitrary or welfare-linked benchmarks that substantially exceed the income needed for a basic acceptable standard of living.” - Ciaran Nugent, economist, Nevin Economic Research Institute & Living Wage Technical Group

3. Mental Health and Wellbeing

The human cost of prolonged family separation is profound and extensively documented in academic research, MRCI's casework, and the lived experience of workers. The current policy produces predictable and preventable suffering - not as an unintended side-effect, but as a direct, structural consequence of its design.

3.1 Impact on Workers

Workers separated from their spouses and children for years describe experiences of chronic loneliness, depression, anxiety, and grief. Many report:

- Difficulty sleeping and concentrating, affecting their work performance and safety
- Increased alcohol consumption and risk-taking behaviours
- Withdrawal from social life and community engagement
- Breakdowns in communication and relationship quality with spouses and children
- Feelings of guilt, inadequacy, and helplessness as parents

MRCI's survey asked workers directly about the personal impact of separation. The responses are striking. Workers have shared deeply personal accounts of the toll this policy takes:

Being separated from my children since July 2022 has been one of the most painful and life-altering experiences of my life, both personally and professionally. As a parent, there is nothing more natural than being present for your children - to comfort them, guide them, and simply share everyday moments. Living without that has left a constant ache that never really goes away. My daughter is 10 years old, and my son is only 5. These are such important years in their lives - years that I am missing. Instead of being there to watch them grow, help with school, or hold them when they're upset, I am forced to experience their childhood from a distance." - **healthcare worker with two children**

"This separation is having a profound impact on my mental health. I spend my rest days in distress because it is heartbreaking to be apart from my daughter, especially given her speech condition. She is reaching vital developmental milestones without her parents by her side, and the emotional cost of this delay is becoming unbearable." - **Jordine Jade Garcia O Byrne, Education/afterschool worker with an 8 year old child.**

"Personally it has destroyed my self-esteem and my will power. I sometimes wake up sick with no zeal to go to work. Professionally, I

*feel like a failure. All I have to offer is money and I can't be there for my wife and children in real time. I use money to compensate for my absence but it has bruised my ego as a father.” - **anonymous***

*“It is difficult to concentrate when your heart is elsewhere - worrying about your children, missing them, and longing to be reunited. This experience has shown me how deeply family separation impacts not just individuals, but entire families. It is not just physical distance - it is emotional strain, lost time, and moments that can never be recovered. The pain cuts deeply every single day. All I want is to be reunited with my children, to hold them again, and to give them the stability, love, and presence they deserve.” - **anonymous***

3.2 Impact on Children

The mental health impacts on children are equally serious. Research consistently shows that children separated from parents during formative years experience:

- Significantly higher rates of anxiety, depression, and behavioural difficulties
- Poorer educational outcomes and language acquisition delays
- Long-term attachment difficulties
- Reduced labour market outcomes in adulthood

The OECD's International Migration Outlook (2019) found that children who arrive late due to family reunification delays show measurably worse educational and economic outcomes. The harm is not temporary - it is cumulative and long-lasting.

No public policy goal justifies the predictable infliction of this harm on children, particularly where - as is the case here - the financial analysis demonstrates that reunification produces a net benefit to the State rather than a cost.

*“Staying far away from my children is creating difficulties in our relationship, my marriage is in danger now. My children cry every time I call them which causes me stress and anxiety. My children won't concentrate in school because of the gap in their lives, as a mother it's not easy at all.” - **Healthcare worker***

3.3 The Systemic Nature of This Harm

MRCI emphasises that the mental health harm described above is not incidental. It is a foreseeable, predictable, and entirely preventable consequence of the policy as designed. When the State sets a 12-month waiting period followed by 18-24 months of processing time, it is making a deliberate choice to separate children from their parents for a minimum of two years. This should be clearly recognised in any future policy review.

4. Economic Impact

One of the stated rationales for restrictive family reunification thresholds is the protection of public finances - the concern that family members will become a burden on the State. MRCI's analysis demonstrates that this concern, while legitimate in principle, is not supported by the available evidence when applied to full-time employed workers.

4.1 Even with Family Reunification, Migrant Workers are net contributors

MRCI conducted a cost-benefit analysis of extending immediate family reunification rights to all GEP holders in 2024.

Across three scenarios modelling different rates of spousal employment (0%, 50%, and 100%), the analysis consistently shows that GEP households are net contributors to the State:

- GEP households generate significantly more in tax and PRSI contributions than they draw in public services
- Net annual gain to the State per 100 GEP workers ranges from €478,000 (0% of spouses working) to €886,000 (100% of spouses working) depending on spousal employment
- Scaled nationally, the net annual revenue benefit equals €137 million to €255 million
- 98% of spouses surveyed stated they intend to work once reunited in Ireland

These figures represent a substantial positive contribution. Far from posing a fiscal risk, granting family reunification rights to full-time workers could increase Ireland's tax base and labour supply.

4.2 Labour Market and Retention Benefits: The Economic Risk of a “Vicious Cycle”

The Department of Finance’s *Future Forty* report makes it clear that Ireland is facing a demographic turning point: our non-migrant labour force is projected to begin declining from **2035 onwards**. To prevent a contraction of the enterprise base and a decline in living standards, the State must not only attract but **retain** migrant workers. While Critical Skills Employment Permit (CSEP) holders already benefit from immediate family reunification, the current policy denies these same rights to General Employment Permit (GEP) holders. This creates a significant retention risk among the very workers filling "unprecedented demand" in essential sectors.

The NESC report warns that failing to support these workers leads directly to a **“vicious demographic cycle”**. In this scenario, restrictive policies and underinvestment in migrant settlement weaken retention, worsen the ratio of workers to dependents, and fuel economic contraction. The Council is explicitly concerned that housing and infrastructure pressures are being used to justify a mindset that regards lower population growth as desirable. Such a stance is counterproductive; as NESC notes, without migrant workers in construction, we cannot build the housing we need, and without them in healthcare, waiting lists will continue to grow.

The Department of Finance highlights that high exit rates—already estimated at **60% for non-resident CSEP holders** over five years—pose major fiscal and workforce challenges. While the Department notes that CSEP holders leave despite having reunification rights, the lack of such rights for GEP holders acts as an even more powerful "push factor" toward emigration. To achieve a **“virtuous cycle,”** Ireland must use migration as a "strategic lever" to stabilize the workforce and support fiscal sustainability. Aligning family reunification rights for GEP holders with those of CSEP holders is a necessary step to ensure these essential workers settle long-term, thereby strengthening Ireland’s intergenerational balance and economic future.

The Family Reunification policy changes from November 2025 are expected to exacerbate worker retention challenges in sectors dependent on migrant labour. Survey data gathered for this submission shows that the current family reunification rules are directly affecting GEP workers' decisions to remain in Ireland: **69% say they are now considering leaving Ireland.**

“Ireland has tightened its rules to make it impossible for people on general work permit to bring in their families so what's the point of working for a government that doesn't care of the general well-being of its workers. It's better to move to more welcoming countries.” -

Healthcare worker

“If I cannot be with my family then there is no reason of staying in Ireland. We are paying tax and working so hard but family reunion is not considered as an issue of paramount importance.” -

Domestic care worker with two children

“I am researching into finding a job in a country that will allow my family to join.” -

Care assistant

The European Migration Network (EMN), in its 2025 study on family reunification observes that family reunification is increasingly being integrated into broader migration and labour market policies across Europe. These findings are particularly relevant in the Irish context. At a time when employers are reporting persistent recruitment and retention difficulties, family reunification should be viewed not merely as an immigration measure but as a workforce retention tool. Workers are significantly more likely to remain, integrate, and build long-term lives in Ireland when they can live with their families.

Restrictive reunification policies risk encouraging onward migration to jurisdictions offering more family-friendly pathways, thereby undermining Ireland's ability to retain the workers on whom key sectors depend.

As one respondent to MRCI's survey said:

“I am considering relocating to Australia. The consideration of relocation is not driven by dissatisfaction with Ireland as a country, but rather by the need for family unity and long-term stability. Any country I choose to live and work in must allow me to function not only as a healthcare professional, but also as a stable parent and spouse.”

Employers across the healthcare, agriculture, food processing, hospitality, and construction sectors have identified family separation as a significant driver of turnover and recruitment difficulty. The cost to employers and to the broader economy of recruiting and training replacement workers far exceeds any hypothetical saving from a restrictive reunification policy.

*“Family stability is a cornerstone of sustainable workforce participation, directly underpinning employee wellbeing, productivity, and long-term retention. Through Elevate: The Inclusive Workplace Pledge, for over five years and engaging with more than 60 businesses employing collectively 160,000 employees nationwide, Business in the Community Ireland is driving inclusive employment. For us, inclusive employment means enabling migrant workers to fully integrate into Irish society - and this cannot be achieved while families remain separated. Policies that support family reunification are essential to building resilient businesses and a more inclusive society.” - **Business In The Community Ireland (BITCI)***

*“The food-led hospitality sector relies on the contribution of international workers who have chosen to build their lives in Ireland. If people are welcomed here to work, contribute and support our economy, they should also have the opportunity to live with their children. Allowing families to be reunited is both the right thing to do and an important step in retaining the talent our sector needs.” - **Restaurant Association of Ireland***

4.3 The Integration Dividend

Research from the OECD and peer institutions demonstrates that family stability is one of the most effective integration measures available to the State. Workers who are sustainably settled with their families around them are demonstrably more productive, more engaged in their local communities, and quicker to master language skills. Rather than acting as a fiscal burden, this integration dividend yields long-term economic benefits by encouraging lifetime career progression, local tax base growth, and civic participation-returns that the current restrictive policy actively foregoes.

4.4 International Comparison

Ireland's financial thresholds for family reunification are significantly more restrictive than those applied in comparable countries. The following table summarises the position of key peer nations:

Country	Immediate Family Join?	Typical Processing	Income Requirement
Ireland	No - 12 month ban	24+ months	Very high (€50,200 for one child)
Spain	Yes (Immediate for shortage roles)	maximum of 45 days (approx. 6 weeks)	Tied to IPREM index; approx. €10,800 per year for spouse and one child)
Australia	Yes	1-5 months	No fixed threshold
Canada	Yes	1-3 months	Ability to support, no fixed amount
Germany	Yes	3 months	Secure livelihood - no fixed threshold
Belgium	Yes	6 months (legal maximum 9 months)	Indexed baseline (110% of minimum income + 10% per

			additional child; approx. €29k-€32k net/yr)
France	After 18 months	6-18 months	Around SMIC level (Standard minimum wage €1,867 gross/month as of 2026)
New Zealand	Yes	4 to 9 weeks (70% within 47 days)	Linked to national median wage; approx. NZ\$58,240 / €33,000 gross/year to sponsor a child
Portugal	Yes	60 days (Statutory standard processing window)	Anchored to national minimum wage; approx. €17,000/year gross total for a family of three
Sweden	Yes	2 to 4 months	Must cover housing + modest indexed net amounts: approx. €900/mo for couples + €290-€460/mo per child

**Comparison based on meat processing operatives, chefs and healthcare assistants.*

Ireland is now among the most restrictive countries in the developed world for family reunification for full-time migrant workers - despite its reliance on migrant labour and its stated commitment to integration.

5. Voices of Workers: Survey Findings

In April 2026, MRCI surveyed migrant workers across Ireland to gather firsthand evidence on the impact of the current family reunification rules. The survey captured data on workers' sectors, immigration permissions, income levels, family situations, and the personal and professional impact of separation. The following findings are from the General Employment Permit respondents:

- **99%** earned less than €51,199, meaning they did not earn enough to bring even one child to live with them.
- **43%** said they had been separated from their family for 1-2 years, while **51%** said they had been separated for 3-5 years.
- **69%** said they are now considering leaving Ireland because of these rules.
- **91%** said the new rules made it harder to achieve family reunification, while 9% were not sure.
- **73%** cited income thresholds as the biggest barrier to family reunification, with **10%** referencing accommodation requirements.
- **59%** felt income thresholds (€30,000) in their sector were achievable to bring a spouse, while **31%** said they were not.
- However, only **8%** felt income thresholds (€50,200 for one child) were achievable in their sector to bring children, with **86%** saying they were not.

Workers were asked what single change to the rules would make the biggest difference. Responses overwhelmingly pointed to the following themes:

- **Reduction or Removal of Salary Thresholds:** This was the most cited issue. Many respondents argued that current income requirements are "impossible" or "unrealistic" for average workers, particularly healthcare assistants and those on General Employment Permits.
- **Faster Processing and Shorter Waiting Periods:** Respondents frequently noted that the cumulative wait- often one year of residency followed by up to two years of application processing- results in families being separated for three years or more.
- **Equality Between Permit Types:** There is a strong call to treat General Employment Permit (GEP) holders the same as Critical Skills Employment Permit (CSEP) holders, who often enjoy more immediate reunification rights.
- **Flexible Accommodation and Age Rules:** Some suggested that the government should reconsider the requirement to have a home large enough

for the whole family *before* a visa is even granted and advocated for including dependent children up to age 22.

- **Focus on Mental Health and Productivity:** Many workers emphasized that being reunited with family would eliminate depression and "loneliness," allowing them to focus more effectively on their jobs.

Some key quotes from respondents include:

"The salary threshold to me seems like a polite way to say don't bring your family. We [are] not getting close to that amount." -

Anonymous

"We will plan things as a family, [to] end [for] children the misery of growing up without parents, it will end broken marriages and mental stress." - **Anonymous**

"It will help by giving my job a full attention when I have my son with me with no depression and full dedication to those I give care to." -

Anonymous

Workers were also asked what message they would like to share with the Minister for Justice. The following responses are representative of those received:

- **Pleading for Empathy and Humanity:** A recurring plea is for the Minister to view these applications as human lives rather than administrative files. Respondents frequently ask the Government to "put themselves in our shoes" and consider the pain of a parent missing their child's development.
- **The Hypocrisy of Recruitment:** Many workers pointed out the contradiction in Ireland actively recruiting migrants to sustain the health, construction, and agricultural sectors while simultaneously denying them the right to live with their families. They describe this as "dependence without respect".
- **Impact on Professional Focus:** Workers in essential services, particularly healthcare and HGV driving, noted that the stress of separation and broken

marriages directly impacts their mental health and ability to focus on their jobs.

- **Financial and Procedural Barriers:** Respondents argued that setting a €50,200 threshold for workers earning far less is an "intentional barrier" and a "cruel irony" for those caring for Irish families while being forced to neglect their own.

Direct quotes from respondents include:

"Please remember that behind every file is a child waiting, a parent hurting, and a family hoping to be whole again." -

Anonymous

"My young son sends voice notes asking when he can come to "our world" to be with me and his father. We tell him to be patient, because we have no other answer to give. Now he repeats those words back to us - saying he will wait patiently - and it is heartbreaking. A child should not have to learn patience in place of being with their parents." - **Anonymous**

"How is a son and daughter of a nurse or doctor or engineer more important than my son and daughter?" - **Anonymous**

"The government is forcing us to choose between providing for our families and actually being with them. We are here caring for Irish citizens while being forced to neglect our own. It is fundamentally unfair and inhuman to grant a permit at a €30,000 salary level, only to demand a €50,000 income to qualify for reunification. That €20,000 gap is an intentional barrier." - **Susan Jatta, Restorative Justice Practitioner.**

6. Accommodation Requirements as a New Structural Barrier to Family Reunification

The June 2026 policy introduces a new requirement that Category C sponsors demonstrate they can provide "suitable accommodation" for their family before an application for reunification will be approved. While ensuring families live in appropriate housing is a legitimate objective, requiring proof of accommodation *before* reunification represents a disproportionate and unnecessary barrier that is not applied to other comparable families.

The overwhelming majority of Category C sponsors are in stable, full-time employment and will be capable of securing suitable accommodation for their families. In most cases, the arriving spouse or partner will also have an immediate right to work, allowing the household to transition quickly from a single-income to a dual-income family. Assessing accommodation before reunification therefore evaluates families on an artificially constrained snapshot of their circumstances rather than on their actual economic capacity once living together.

The policy also requires families to secure accommodation before they can realistically determine their long-term housing needs. It is both impractical and financially burdensome to expect a worker to obtain larger accommodation for family members who are not yet permitted to enter the State, particularly where the application process itself may take many months.

Reinforcing a Discriminatory Two-Tier System

This accommodation requirement applies only to Category C sponsors. Category B sponsors, including Critical Skills Employment Permit holders, are not required to satisfy the same pre-approval accommodation assessment.

As a result, two workers making valuable contributions to Ireland may be treated fundamentally differently solely because of their employment permit category:

- A software engineer holding a Critical Skills Employment Permit may reunite immediately with their family without any prior assessment of accommodation.

- A healthcare assistant, chef, meat processor or care worker must first satisfy an intrusive housing requirement before becoming eligible for reunification.

This distinction lacks any clear objective justification. More fundamentally, it creates a level of State scrutiny that is not applied elsewhere. Irish citizens, Critical Skills Employment Permit holders and most other residents are not required to demonstrate, in advance, that their accommodation meets prescribed standards before they may live together as a family.

Imposing this requirement exclusively on one category of migrant workers undermines the principle of equal treatment and further entrenches a discriminatory two-tier system of family reunification.

Key Asks & Recommendations

To ensure this policy does not become a tool for state-enforced family separation,

MRCI urges the Department of Justice to **Remove the Accommodation**

Requirement. The pre-approval accommodation test should be removed entirely for full-time employed sponsors, recognizing that families do not need to be vetted on this prior to approval.

7. Recommendations

The Cumulative Effect

Taken together, these measures create a series of cumulative barriers that apply only to General Employment Permit holders:

- a mandatory 12-month waiting period with a further 18-24 month processing period;
- substantially higher effective income thresholds for families with children along with the use of a household income indicator applied only to one earner;
- a pre-approval accommodation assessment; and
- the effective exclusion of workers who access lawful housing supports.

The combined effect is to place family reunification beyond the reach of many otherwise eligible, fully employed workers, despite their continued contribution to Ireland's economy and public services.

Based on the evidence set out in this submission, MRCI calls on the Department of Justice to implement the following reforms to the Non-EEA Family Reunification Policy

Recommendation 1: Expand Category A to Include All Full-Time Workers

Extend Category A status to all Stamp 1 (including GEP holders) and all Stamp 4 holders in full-time employment. This would remove discriminatory waiting periods and salary thresholds for all full-time workers and align Ireland with international standards.

Recommendation 2: Commit to Processing All Applications Within Six Months

Ireland's current processing timeline of 18-24 months is among the longest in the developed world. The Department should commit to a maximum processing time of six months for all applications, with clear targets, resourcing, and public reporting against this standard. Several comparable countries process applications considerably faster- including Spain (maximum 45 days), Portugal (60 days), Germany (approximately three months), Sweden (two to four months), Canada (one to three months), and Australia (one to five months) while six months would remain broadly consistent with Belgium's statutory framework.

Recommendation 3: Introduce a Best Interests of the Child Assessment

All family reunification decisions involving minor children should include an explicit, documented assessment of the best interests of the child, in line with Articles 3, 9, and 10 of the UN Convention on the Rights of the Child. Blanket waiting periods without individual assessment are incompatible with this obligation.

Recommendation 4: Revise Income Thresholds to Reflect Actual Wages

If income thresholds are retained, they should be recalibrated to reflect actual cost of living, for instance, MESL. Any threshold applied should be evidence-based and subject to annual review with public consultation. The State cannot simultaneously approve employment at a given wage level and then declare that wage insufficient for family life.

Recommendation 5: If using WFP as a threshold, ensure all household income is calculable

Under the new Family Reunification rules, only the sponsor's income is calculated. This is illogical and discriminatory given that the WFP is a household income calculation. The adoption of this policy appears to be a deliberate barrier to family reunification for children. Any income thresholds applied to migrant workers should be consistent with how they are applied to the rest of the population.

8. Conclusion

Ireland has built its modern economy on the labour of migrant workers. Those workers have filled hospitals, farms, factories, care homes, and construction sites. They have paid taxes, built communities, and contributed enormously to the social and economic fabric of this country.

The current family reunification policy repays that contribution by separating them from their children for years, imposing income thresholds that are structurally unachievable, and telling them that their wages - wages the State itself set and approved - are not enough to live with the people they love.

This is not a proportionate or evidence-based policy. It is not in line with Ireland's international human rights obligations. It is not consistent with the *UN Convention on the Rights of the Child* and it is not economically rational - the evidence shows that

family reunification could be a net benefit to the State and would not impact negatively on the economy.

MRCI calls on the Minister and the Department of Justice to implement the recommendations set out in this submission. A reform as simple as expanding Category A to include all full-time workers would transform the lives of thousands of families, strengthen Ireland's labour market, and position Ireland as a country that treats its migrant workers with the dignity they deserve.

Every full-time worker doing essential work in Ireland deserves to live with their family. That is not a policy aspiration - it is a human right.

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