Doras
Promoting and Protecting Human Rights

GENERAL SCHEME OF THE IRISH NATIONALITY AND CITIZENSHIP (AMENDMENT) BILL 2026

WRITTEN SUBMISSION TO JOINT COMMITTEE ON JUSTICE, HOME AFFAIRS AND MIGRATION

OCTOBER 2026

INTRODUCTION

Doras has been in operation as a refugee and migrant support organisation since 2000. We provide a free information and support service to people from a migrant and refugee background on issues relating to international protection, immigration and integration. This work directly informs our advocacy, which aims to improve policy and practice in these thematic areas.

Doras welcomes the opportunity to comment on the General Scheme of the Irish Nationality and Citizenship (Amendment) Bill 2026. However, based on our direct experience working with migrants from a wide range of backgrounds, we believe the proposed Bill should not progress to become law, as it is fundamentally unfair, unnecessary, and serves no useful purpose.

- It would introduce some of the most restrictive forms of legal requirements on applicants for citizenship in Europe, including longer residence requirements, status-based restrictions, language and integration tests, and stringent employment and welfare restrictions.
- Migrants are already trapped in a cycle of uncertainty, with annual renewals of their residence status. With the lengthy administrative delays in processing both renewal applications and applications for citizenship, migrants are exposed to job losses and face longer uncertainty about their futures and their children's futures. This undermines the work being done at national and at local level to support integration.

In the alternative, if this proposed Bill does proceed, we ask that the following be considered.

COMMENTS AND RECOMMENDATIONS

Head 5 – Amendment to Section 15 of the Act of 1956

1. We recommend removing amendment 1 (a) pertaining to Section 15, subsection 1, of the Act of 1956 for the following reasons:
    a. Increasing the residency requirement from a total of five to eight years would significantly delay secure and stable immigration status for people who have already built their lives in Ireland. Current processing delays of up to two years would mean that the actual time spent in the country before obtaining citizenship is 10 years.
        a. This makes Ireland a less attractive option for foreign workers and is at odds with *Global Citizens 2030 - Ireland's Talent and Innovation Strategy*[1], which is intended "to confirm Ireland's place as a first-choice destination for international talent and as a thought leader in education, research, innovation and science policy." Restricting and adding demanding requirements for naturalisation would mean that Ireland loses out on its global competitiveness and attractiveness for talent.

[1] See https://www.gov.ie/en/department-of-further-and-higher-education-research-innovation-and-science/publications/global-citizens-2030-irelands-talent-and-innovation-strategy/.

b. The longer wait is particularly harmful as Ireland is the only country in the EU that offers no right to permanent or long-term residence, leaving non-EU residents in greater socio-economic precarity.

c. The need to renew Irish Residence Permit (IRP) cards for a further three years places an additional financial burden on low-paid workers.

d. Not having a secure status in the country for close to a decade can have significant negative consequences for individuals. For example, women and children living in abusive relationships with Irish or EU citizen partners are denied the secure status, granted by citizenship, which they need to leave sooner.

e. This can also have implications for employers, as workers from countries that require a visa to travel within Europe will be restricted from going abroad for work.

f. Extending the residency requirement would leave people living, working, paying taxes and raising families in Ireland without the right to vote in general elections or referendums for longer.

g. Extending the period of continuous residence in the State immediately before the date of the application will create additional unnecessary distress for people who are planning to apply for citizenship. A case in point is someone whose parent is dying or has died in their country of origin.

2. We recommend removing amendment 1 (c) pertaining to Section 15, subsection 1, of the Act of 1956 for the following reasons:

   a. Citizenship should not depend on a person's income. An income threshold would particularly disadvantage people in low-paid or insecure employment, as well as people who are unable to work due to illness, disability or caring responsibilities.

      Research shows that citizenship can support migrants' economic integration and increases in earnings following naturalisation. A secure status can give people greater freedom to move jobs, rather than remaining dependent on precarious employment to maintain their status.

   b. People should not be excluded from citizenship because they need to avail of social welfare or housing support during a difficult period. In practice, this means that even after eight years of living, working and paying taxes and PRSI contributions in Ireland, migrants could be forced to choose between accessing certain social welfare supports if they lose their job or become sick, and maintaining their eligibility for citizenship.

   c. A formal language test could unfairly exclude people because of disability, age, trauma, limited access to education or difficulties accessing appropriate language classes.

   d. Instead of putting the onus on people who come to Ireland to learn English or Irish, and to attain a knowledge and understanding of Irish civics, the State should invest in addressing the current inadequacy in English language provision and in orientation

programmes for new arrivals. This will support their early integration. Furthermore, in their 2020 publication on '*Supporting integration? International practices on civics and language requirements linked to naturalisation*'[2], the ESRI pointed out that if the goal is to promote the societal integration of migrants, requirements should focus on learning opportunities such as courses, rather than on exams.

3. We recommend removing amendment 3 pertaining to Section 15 of the Act of 1956 for the following reasons:

    a. As noted in paragraph [2], citizenship should not depend on a person's income. An income threshold would particularly disadvantage people in low-paid or insecure employment, as well as people who are unable to work due to illness, disability or caring responsibilities.

    b. As also noted in paragraph [2], people should not be excluded from citizenship because they need to avail of social welfare or housing support.

4. In the alternative, if citizenship is being restricted on the basis of social welfare payments and housing supports, such payments and supports should not be prescribed by way of regulations to be made by a Minister. The core conditions for becoming an Irish citizen should be decided by the Oireachtas, and not left to the regulatory or discretionary powers of a Minister or government officials.

Head 6 – Amendment to Section 15A of Act of 1956

5. We recommend removing amendments 1, 2, 3 or 4 pertaining to Section 15A of the Act of 1956 for the following reason:

    a. The negative impacts outlined in paragraph [1] also apply to the proposed changes relating to spouses or civil partners of an Irish citizen.

6. We recommend removing amendment 5 pertaining to Section 15A of the Act of 1956 for the reasons outlined in paragraph [2] (c) and (d).

Head 7 – Insert new Section 15F into the Act of 1956

7. For the reasons outlined in paragraphs [2] and [3], we recommend the removal of the proposed new Section 15F.

8. The determination of payments that prevent a person from obtaining citizenship, and the social housing supports that prevent a person from obtaining citizenship, should not be within the gift of a Minister. The proposed prescription of a minimum level of income, social welfare payments, and housing supports removes democratic accountability, undermines legal certainty, and can lead to problems in the practical oversight of how the legislation is implemented.

    In the event that the legislation puts restrictions on who is granted citizenship, the Oireachtas should have an opportunity to determine what those restrictions are. We

[2] See https://www.esri.ie/publications/supporting-integration-international-practices-on-civics-and-language-requirements.

therefore recommend that if this amendment to the Act of 1956 is not removed, that Sections 15F (2) and (3) are replaced with clearly prescribed payments or classes of payments, and housing supports.

9. At a minimum, the following should not preclude people from obtaining citizenship: temporary unemployment, disability related payments, carer's payments, parental or family related supports, and supports received because of increases in housing costs.

Head 9 – Section 16A of the Act of 1956

10. Residency periods accrued by persons who have spent five years in the State should be reckonable residence for the purpose of obtaining citizenship. We therefore recommend removing the exclusions as proposed in amendment 1 to Section 16A of the Act of 1956.

11. In particular, time spent in the state as a beneficiary of temporary protection should be reckonable residence. Removing this entitlement would significantly undermine the integration of beneficiaries of temporary protection from Ukraine who have been living and working in Ireland for several years. Not only is their integration of importance to people who cannot return to Ukraine; it is also in the overall national interest as many are contributing significantly to the economy.

ENDS