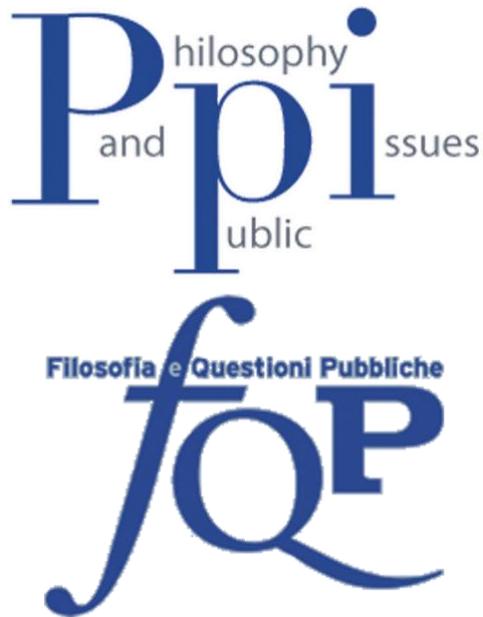


SYMPOSIUM
MIGRATION AND JUSTICE FOR PEOPLE ON THE MOVE



CITIZENS IN ACTION AGAINST
IMMIGRATION INJUSTICE

BY
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Citizens in Action Against Immigration Injustice*

Patti Tamara Lenard

When Dawn Wooten’s alarming allegations, that migrant women in the Irwin County Detention Centre in the US state of Georgia were being subject to unwanted hysterectomies, came to light, she was praised for her willingness to accept severe costs (she was allegedly demoted in retaliation for her complaints) to expose the depth of human rights abuses to which detained migrants are subject. The nurse, described by many as a “real American hero” for her willingness to file suit against the Detention Centre and to speak publicly about what she witnessed, is one of many American citizens who have been willing to make substantial personal sacrifices to support the most vulnerable of residents in the United States. In her new book *Justice for People on the Move*, Gillian Brock suggests that citizens cannot be asked as a matter of course to resist “unjust immigration law” because it can “involve significant costs that we cannot always reasonably oblige particular citizens to absorb” (Brock 2020, 219);

* Thanks to Luara Ferracioli for very helpful comments on an earlier draft of this commentary.

yet, as Wooten demonstrates, citizens often do take on these costs. In what follows, I suggest there is an inconsistency between Brock's devastating account of global immigration injustice and her suggestion that citizens cannot be asked to bear significant costs in order to struggle against it. In particular, I shall suggest that where the costs are unjustly imposed by governments aiming to pursue and cement immigration injustice, there are reasons to believe that citizens must accept costs associated with combatting it.

To make this claim, I begin, in the first section, with an account of how Brock treats the obligations citizens have to resist immigration injustice. Her suggestions are, first, that citizens must vote against anti-immigrant parties, and second, that citizens have duties of welcome, a suggestion with which I agree; however, as I explain, she wrongly describes sanctuary movements as mainly demonstrating these duties of welcome. I offer an alternative way to think about sanctuary movements and their role in combatting immigration injustice, which suggests that sub-state jurisdictions are required to take on the sometimes severe costs of adopting sanctuary policies. In the second section, I outline a range of individual and collective actions that citizens can and do take, to give Brock some resources from which to offer us a more robust account of the options citizens have to fight immigration injustice. I describe humanitarian actions; migration humanitarian actions; solidarity actions; supportive actions; and pro-active (rather than merely responsive) welcoming actions. These actions differ with respect to the costs associated with them; as well, the source of the costs differs, in the sense that sometimes it is imposed by an outside entity like the government, and other times, they are voluntarily taken on. I offer two thoughts over the course of this analysis. First, I wonder if the source of costs that citizens may be asked or required to take on shift the proper moral response that we ought to have towards them. And second, I suggest that if we

take the “welcome” requirement seriously, it may be that the duty is more substantial than Brock admits. Ultimately, the purpose of my response is to invite Brock to offer readers more details with respect to whether and when costly actions in defense of immigration justice must, as a matter of justice, be taken.

In articulating these clusters of options, my aim is secondarily to elevate a story that runs beside the bleak narrative that motivates Brock’s work. Citizens around the world are doing extensive and difficult work to support global and local migration justice. I am hopeful that readers conclude this short response piece in awe of the work that individuals, as individuals and in groups, are doing in support of migrants – to see that the pro-immigrant constituency is large and mobilized, locally and globally. In my view, too much effort has been spent of late discussing the widespread anti-immigrant hostility that has recently emerged, which has appeared to bolster the electoral successes of anti-immigrant political parties, in addition to pressing more moderate parties to resist more open immigration options. So, in addition to encouraging Brock to consider more deeply the obligations that individuals have, as citizens, to fight immigration injustice, I also aim to amplify the actions of those who take action in service of immigration justice – especially because such actions may well meet the “low cost” requirement that Brock identifies.

I

Duties of welcome and the sanctuary movement

Let us begin by outlining the context for Brock’s, and my, analysis. The setting is a bleak one, as she tells us: global forces are acting to make migration across borders harder than ever, and they are doing so with the support of anti-immigration political parties whose electoral popularity is growing. Rampant “racism,

xenophobia, national or ethnic tensions, and intolerance” make rights protection for all migrants, especially refugees and asylum seekers, difficult if not impossible to secure (Brock 2020, 112-113). Fearful host communities continue to worry that arriving refugees are possible terrorists, or likely criminals, and political leaders are overwhelmingly choosing to capitalize on this fear, running campaigns promising security from these threats. Rather than behave responsibly by deflecting attention from people’s “socially constructed” fears, many of which exaggerate the likelihood of terrorist events, “opinion elites are quite willing to cultivate fears for their own advantage” (Brock 2020, 178-179). The result? A population that is fearful of migrants, prepared to discriminate against them, encouraged and supported by leaders who find it expedient to propagate rather than dispel these fears, and a range of policy measures intended, first, to restrict migrants’ ability to gain access to liberal democratic states and, second, to reduce their protections should they gain access in spite of these measures. As a result, necessitous migrants are forced to cross borders in dangerous ways, often with the help of traffickers, and those who gain entry are too often denied the protection to which they ought to be entitled, according to international law.¹ This is a familiar story. How should citizens respond, according to Brock? In very general terms, when Brock focuses on the duties that citizens have with respect to supporting or bringing about immigration justice, she directs her attention to actions available to them in their local communities.

First, Brock advises us that, as citizens, we have an obligation to vote for political parties that support immigration justice (Brock 2020, 218). This is an easy demand in principle, but complicated in

¹ The language of “necessitous” is Sarah Song’s, and is used to sidestep the question of the source of migrants’ necessity (whether persecution, climate change, or economic). See Song 2018.

practice, in virtue of the many factors that shape political parties' platforms. Voting for the party that best supports immigration justice may also entail voting for the party that does least for education justice, for example. Some voters are "single-issue" voters, perhaps, but it is unreasonable to suggest that, as a matter of justice, what citizens must do is vote for the political party that best supports immigration justice, ignoring all the other relevant justice-related questions on which political parties adopt stances. So, one question we may have for Brock, as citizens considering our political responsibilities, is how considerations of immigration justice ought to be weighed against other possible issues voters may be asked to consider.

Here is the particular problem: it is frequently the case that political platforms support both immigration restrictions and expansive redistribution policies. Why? Many suggest that expansive redistribution policies, which transfer significant wealth from the most well-off to the least well-off, rest on trust among a population. This trust depends on a certain homogeneity among a domestic population, which in turn tells in favour of restricting immigration. According to many scholars, and some empirical evidence bears this out, robust egalitarian policies are at risk of being undermined where immigration is high (Crepaz 2006; Abascal and Baldassarri 2015). With David Miller, I have examined this evidence in considerable detail, and although our reading is that we have reasons for optimism that well-managed immigration will not reduce support for redistribution, there is some evidence that the connection remains true, that is, that higher rates of immigration-related diversity can in some circumstances drive down support for redistribution (Lenard and Miller 2018). Thus, we need to think seriously about how to advise citizens if they face this real conflict when they are asked to make a choice at the ballot box.

Brock might deflect the question, saying that in fact citizens do have another real option to pursue in the face of the conflict I outlined above, at the level of the local community. She says, residents in local communities – cities, presumably, but also suburban spaces that welcome migrants, often because of a deliberate political strategy to distribute migrants across a country – have a key job to play in creating welcoming spaces for newcomers. The expanding role that cities play in the immigration space has been well-noted (de Shalit 2019; Good 2009). Immigrants, including refugees and asylum seekers, seek out cities, with their wider range of services and opportunities, in which to settle. At least in countries that aim to welcome immigrants, cities are also often the sites of the most robust of settlement services – offering support in finding employment, education, accommodation and health care to newcomers, in culturally sensitive ways.

According to Brock communities are obligated to engage in creating a welcoming space for newcomers. Citizens must act by “showing hospitality to newcomers settled in their communities and making efforts to build local inclusive communities” (Brock 2020, 218). In demonstrating such hospitality, citizens act so as to “create the kinds of inclusive communities necessary to sustain migration justice” (Brock 2020, 219). Ultimately, says Brock, it is important to “stress obligations to welcome newcomers in one’s local environment as an important action in creating the kinds of inclusive communities we should endeavor to foster in seeking to promote justice on many levels” (Brock 2020, 219). Such obligations “includes ones to support local organizations, such as those dedicated to creating a welcoming culture for everyone, especially newcomers” (Brock 2020, 221). Perhaps a robust focus on creating a welcoming culture will, in time, dissolve the conflict I identified earlier between egalitarian and immigration justice. Perhaps, however, it will not. Is a dutiful citizen permitted to vote

for egalitarian political platforms (and therefore, possibly with a heavy heart, against immigration justice), while working to create a welcoming city?

In the course of her discussion of the importance of welcome, Brock highlights the sanctuary city initiative in Sheffield, UK, which focuses on creating spaces in which newcomers and citizens can interact – an opportunity created by local leaders who aim at creating “opportunities for constructive relationships” (Brock 2020, 221). From this example, Brock suggests that we ought specially to support the non-governmental organizations that create spaces for interaction:

we have obligations to participate in the welcoming process to create the kinds of inclusive communities that create space for newcomers, and recognition of everyone’s valuable contributions. Citizens operating in local contexts have important obligations to help governments manage people’s ethnocentric inclinations in ways that create communities conducive to harmonious living (Brock 2020, 223).

Yet, the adoption of sanctuary policies that explicitly focus on welcome, as they do in Sheffield, is unusual, and so a focus on Sheffield is perhaps not as helpful as Brock intends. In general, the adoption of sanctuary policies is pursued not as a welcoming initiative, but rather as a political statement taken by a local jurisdiction in opposition to unjust immigration admission and enforcement policies. Mostly, sanctuary policies are understood to be those that, broadly, limit the cooperation of cities with state-level immigration enforcement, and so are properly characterized as resisting immigration injustice; they are scattered throughout the United States in significant numbers (Center for Immigration

Studies 2020), as well as in Canada, Mexico, and many European countries.² There are three major types of sanctuary policies. One type are “don’t ask, don’t tell” policies. These are policies that instruct service providers to avoid asking questions about clients’ immigration status before providing services. A second type are “non-cooperation” policies, which limit the ways in which especially local law enforcement can communicate with state-level immigration enforcement. Standard examples include refusals to forward information about individuals, who come into contact with local police (as potential criminals or victims of crimes) with immigration enforcement agents, and refusing to detain individuals on behalf of such agents. A third type are “support” policies, which direct local agencies to offer free or low-cost legal support services to those who are at risk of being targeted for deportation by immigration enforcement agencies (Parekh and Davis 2018).

There is a wide range of justifications for the adoption of these policies, which I have explored in detail elsewhere (Lenard 2020; Wilcox 2019). For now, let me note the form of four major justifications for them, all of which rest on a persuasive justice-claim: 1) one justification says that local service providers, who collaborate with immigration enforcement agents, will simply not be able to do the job they are assigned; 2) a second justification says that the protection of human rights, which many local service providers are charged with protecting, is more important than collaborating with immigration enforcement agents and must be prioritized; 3) a third justification is explicitly oppositional, saying

² A detail which is outside the scope of this review is that sanctuary cities understood on this model are primarily available in “non-unitary” states, in which sub-state jurisdictions have some power over the policies that are adopted and enforced in that jurisdiction. So one reason that Sheffield may have opted for a welcoming strategy is that, because the UK is a unitary state, the city of Sheffield has very little legislative power, and thus few options beyond what it chose to do. For more see Lenard 2020; Parekh and Davis 2018.

that there is a normative imperative for cities to protect vulnerable residents from unjust immigration enforcement; and 4) a fourth justification states that sanctuary policies are intended to signal, as Brock highlights, a spirit of welcome to newcomers, whatever their origin, and to emphasize that, as a city, the important objective is to protect and support all residents regardless of their immigration status.

I think this fourth justification is important to emphasize, certainly, but I think it is a serious error to identify this dimension as a central impetus of sanctuary policies. One reason to avoid making the signalling objective central is that sanctuary providers themselves are critical of jurisdictions that merely adopt the status, arguing that doing so – without additional policy change – gives irregular migrants a false sense of security (Hudson et al. 2017). Moreover, sanctuary policies are not primarily adopted as a way to signal welcome, but rather as I indicated above as a way of signaling opposition to state level immigration enforcement mechanisms. The willingness to engage legal fights to defend the right of cities and states to refuse cooperation with immigration enforcement is supported by populations which, by and large, are invested in the moral belief that such enforcement is unjust and that those subject to it are entitled to protection from it. The costs of adopting sanctuary policies can be severe, moreover, especially in the United States, where the federal government is persisting in its attempt to punish sanctuary jurisdictions by withholding resources to which they would ordinarily be entitled, and which they rely on to sustain many services and programs (Alvarez 2020). If, then, the adoption of sanctuary status is understood in terms of an intent to oppose unjust immigration enforcement policies, and if therefore their adoption imposes severe costs, does Brock want to defend them as duties, as she suggests in her discussion of the movement in Sheffield, or reject them (as obligatory) because the costs are too high?

II

Combating immigrating injustice and the costs of doing so

Above, I considered Brock's account of the duties that cities possess to welcome migrants, suggesting that "sanctuary movements" are not best described as focused on welcome, in general. Rather, I suggested, jurisdictions typically adopt sanctuary status as a way to combat immigration injustice. But, there is more that citizens, acting individually and collectively, can do to combat immigration injustice. In what follows, I proceed by example to articulate five possible types of actions that citizens may take, and often do take, to combat immigration injustice, all of which carry costs (this list is by no means complete). I note that in some cases the costs are voluntarily taken on, and in others, they are imposed by an unjust state. In particular, they are often imposed by governments attempting to coerce citizens into supporting immigration injustice. In my view, the injustice of the costs complicates the assessment of whether citizens are obligated to take them on; in other words, it may not be enough, as Brock suggests, to say simply that the costs of combating immigration injustice are severe, and citizens may permissibly avoid taking them on. Additionally, I suggest, the welcome imperative may demand more costly actions as well.

One type of action that citizens can take is straightforwardly humanitarian. Some individuals inadvertently find themselves in situations where they are asked for help. Think of Theresa Todd who passed individuals on the side of the road in Texas, who asked her for help in getting access to medical support. At the time she stopped her car, she wasn't focused on whether these individuals were present in the United States irregularly, but on whether she could find them the support they needed – she described herself as going in to "total mom mode." Here is another version of the same story. Although there is increasing tension in Lampedusa,

Italy, the island has been historically understood as welcoming for migrants – Vincenzo Esposito, a long-time fisherman explains, simply, that he gave what he had on his boat, to passing migrants, “food, cigarettes, money” (Giuffrida 2017).

Were Todd and Esposito required by justice to do what they did? For one thing, it is ordinary, in moral thinking, to believe that we ought to help others, where we can do so at little cost to ourselves. For another, it is conventionally believed that people do have basic humanitarian duties, even if they are unspecified in various ways. So, it seems plausible to believe that Todd and Esposito were, simply, carrying out basic humanitarian duties, which they had the right to believe they could carry out at little cost to themselves. Todd and Esposito were simply offering help, to people in need, because they were in the position do so without significant sacrifice. Yet, what is noteworthy about Todd’s case is that she was threatened with legal penalty. When Border Patrol stopped her car, to say that by her actions she might have been guilty of “transporting illegal aliens”, her response was “what are you talking about?” (Fernandez 2019). The primary motive for offering support in these cases was not connected to a prior view on the justice or injustice of the asylum process, or whether those in need were legally present and so deserving of support. They were just people helping others in need, because they could.

Contrast these basic humanitarian actions, carried out simply in virtue of the capacity to help others, with those who act in support of migrants knowingly, which I will call migration humanitarian acts. Cedric Herrou, an olive farmer in southern France, has helped at least 250 migrants cross the border from Italy into France to seek asylum there, or sometimes simply to continue onward journeys to other European states. Along with some others, he has offered support to them by setting up a camp in which they can rest before continuing their onward journey, and by helping them

to strategize with respect to next steps – he has been described as operating an “underground railroad” for migrants travelling from Africa (Nossiter 2016). Acting as a “de facto leader of a low-key network of citizen smugglers”, Herrou was angered by the French government’s response to the movement of often desperate individuals from Africa into Europe. He had been accused and convicted of helping migrants to enter the country illegally, but a French court later ruled that French citizens cannot be prosecuted for “crimes of solidarity” (Al-Jazeera 2020).

Similarly, German citizen Carola Rackete, captain of Sea-Watch 3, a rescue ship run by Sea-Watch, a German NGO, rescued 42 migrants from an inflatable raft in the Mediterranean Sea, off the coast of Libya, and after hosting them on her ship for two weeks, forcibly made her way into Italian waters, saying she was no longer able to “guarantee the safety of these people anymore.” In explaining her choice, she said, “For two weeks, we had been informing the authorities that the situation of the people onboard was becoming more and more critical and that the medical conditions of migrants were getting worse, day after day.” But, she continued, “it was like talking to a brick wall. The incident at the port was the desperate outcome of a frustrating chain of events that started almost 20 days before” (Tondo 2019). She faced legal proceedings on charges of aiding illegal migration (which, had she been convicted, would have come with a penalty of up to 15 years in prison). In January 2020, the Italian Supreme Court ruled that she ought not to have been arrested in the first place (Al-Jazeera 2019). Likewise in the United States, Scott Warren, a volunteer with No More Deaths, which provides food, water and first-aid kits to migrants crossing the border from Mexico was recently acquitted of the crime of “harboring undocumented migrants” (for more on the work being done at the US-Mexico border, see Cabrera 2010). In his comments on Warren’s acquittal, one of his lawyers said, “They decided that humanitarian aid is not always a

crime the way the government wanted it to be” (Allyn and Marizco 2019).

What these individuals share, acting individually or as part of a collective with a shared objective, is a felt imperative to support very specific individuals: proximate migrants in need of support to cross the border, to continue an onward journey in search of safety, and to eventually access the safety to which they are entitled. The justifications they offer are of two general types: one is certainly humanitarian, focused on the importance of helping those in need, and another is sometimes loosely and sometimes explicitly, directed towards the injustice of a migration regime that turns those who seek safety from persecution or starvation into pariahs who ought to be excluded.

What these actions share with Todd and Esposito’s actions is that they have been, across democratic states, criminalized such that those who carry them out face relatively significant penalties. Melina Duarte describes the myriad ways in which governments have chosen to criminalize actions taken by citizens in support of precarious migrants (Duarte 2020). The “criminalization of solidarity” follows the trend of criminalizing of basic interactions between citizens and immigrants with irregular status, for example by penalizing landlords who rent accommodation to them and employers who hire them. In adopting these policies, says Javier Hidalgo, governments are forcing citizens to be complicit in the enforcement of immigration. Correspondingly citizens are justified in using a range of techniques to avoid doing so; and indeed, in Hidalgo’s view, they may even be required to do so (Hidalgo 2016).

As demonstrated in nearly all of these cases, the costs are to the individuals themselves who, where their actions are criminalized, face penalties in the form of fines or incarceration. It seems right to argue that something has gone deeply wrong where basic humanitarian actions are criminalized (Duarte 2020), but that does

not help Brock to advise individuals who will inevitably face severe costs for engaging in them, nor whether individuals may be obligated to undertake them. Here, in other words, the costs these individuals take on are substantial, and Brock may believe that citizens can thereby permissibly choose to avoid taking them on, but it is surely also morally relevant that their source is itself unjust. That is, they are – I think Brock will agree – imposed by an entity that is perpetuating immigration injustice by adopting laws that impose penalties of just this kind.

Contrast the above humanitarian actions with solidarity actions. Solidarity actions are those that citizens take to signal empathy with a particular group (Gould 2007). For example, the employees of Wayfair, an online furniture store, walked off the job in protest of its employer's choice to sign a contract to provide furniture to migrant detention centres in the southern United States. In explaining their choice to walk out, employees wrote: "The US government and its contractors are responsible for the detention and mistreatment of hundreds of thousands of migrants seeking asylum in our country – we want that to end" (Helmore 2019).

In the Wayfair case, the protest was launched by employees to object to choices made by their employer, to demonstrate solidarity. But they were also intending to signal dissatisfaction with being coerced to collaborate with entities (detention centres) that they believed were complicit in injustice towards migrants (Hidalgo 2016). In the case of Wayfair, the actions were taken by employees in protest of actions taken by their employer. But the leaders of many companies adopt similar positions. For example, there are several cases in which private companies have mounted protests against state immigration policies. Many airlines, including American Airlines have asked that their airplanes not be used to transport children separated from their parents: "We have therefore requested the federal government to immediately refrain

from using American for the purpose of transporting children who have been separated from their families due to the current immigration policy. We have no desire to be associated with separating families, or worse, to profit from it” (Fausset 2018).

In neither of the cases above were the actions taken criminalized. However, the potential costs may have been severe. Wayfair might have chosen to terminate the contracts of employees who left their posts in protest (just as Wooten was allegedly demoted for speaking out); Wayfair itself might have, had the walk-out lasted long enough, lost contracts and therefore profits; American Airlines may too have lost revenue. In these cases, the costs are voluntarily taken on, as a way to avoid complicity in perpetuating immigration injustice, in contrast with the humanitarian actions I described earlier, where the costs were imposed by the state.

Citizens voluntarily take on costs in support of precarious migrants in other ways. Supportive actions those are taken by individuals who support migrants by offering access to their professional services, especially legal and educational. Migration lawyers across the United States acted swiftly to reach individuals effected by the so-called “Muslim ban” in the United States, which went into operation in an early form very shortly after Donald Trump was elected – using a range of social media platforms including Twitter and Facebook, lawyers made their information public, letting individuals know that if they were refused entry to the United States on the grounds of the ban, they were willing to represent them at no cost. Just as were Todd and Esposito’s actions, the outpouring of willing legal support was spontaneous and personal. It can be more formally organized, as well. In some cases, non-governmental organizations act to coordinate professionals who are willing to collaborate in offering in particular legal support to detained migrants and asylum seekers. In the

United States, the Refugee and Immigrant Center for Education and Legal Services, operating largely from Texas, for example has focused on offering legal support to detained migrants, and have been especially directed at this task as more and more individuals are detained for longer periods of time. They explain their objective as follows: “we are a nonprofit agency that promotes justice by providing free and low-cost legal services to underserved immigrant children, families, and refugees” (“RAICES” 2020). Here again, the actions taken by citizens are voluntarily taken on by those with relevant professional expertise. Perhaps these actions, which are voluntary and low-cost, are obligatory in Brock’s view? There is a plausible case to be made that they form part of the “welcoming” duties that Brock asks citizens to take on.

Finally, consider an additional form of pro-active welcome action that citizens might take on, as compared to the responsive welcoming actions that Brock describes as obligatory. Here, I am thinking of the Canadian Private Sponsorship of Refugees Program (PSRP, about which I have written elsewhere (Lenard 2020)). The PSRP permits citizens of Canada in groups of 5 or more to select refugees for admission to Canada, on the condition that they make a substantial financial contribution and take responsibility for the central welcoming and integration tasks for one year. The program permits Canadians in general to respond to migration injustice, by acting to welcome refugees in need of safety, and it is a flexible tool that allows citizens to respond as well to crises like the exodus from Syria efficiently.

In this case, the presence of an infrastructure that permits and encourages private citizens to engage in migration justice – the available infrastructure reduces, for Canadians, the opportunity to throw their hands up saying that they cannot, alone, act to provide justice for refugees (Labman and Cameron 2020). This program is being adopted elsewhere around the world, and gives citizens a

government-sanctioned mechanism by which to support migration justice (ICMC Europe 2017; Kumin 2015). There are substantial material and emotional costs associated with choosing to sponsor privately, but they are not like those imposed by a state that has criminalized basic humanitarian actions. There are many critical comments one can offer about the operation of the PSRP in Canada (Lenard 2016), but their availability forces this question: are citizens obligated, given the scarcity of safe options for refugees (Brock 2020, chapter 6), to participate in these programs where they are made available to them? Just as with respect to the supportive actions I described above, there may well be a case to make that, in spite of the relatively substantial costs of private sponsorship (compared to the lower costs of supportive actions), they form part of the “welcoming” duties that Brock defends.

Conclusion

In *Justice for People on the Move*, Gillian Brock considers the role that citizens have with respect to securing and ensuring immigration justice. The role is substantial, as she conceives it, and focuses on the ways in which citizens can create and sustain welcoming communities for those who arrive. This role is an important one, but in my response, I have attempted to flesh out additional ways in which citizens can and may well be obligated to contribute to the pursuit of migration justice. I have identified a wide range of ways citizens do presently support immigration justice, to suggest that their felt obligations may be more than merely felt, but in fact reflect the genuine duties that citizens have to confront and combat immigration injustice. I am hoping, by this response, to encourage Brock to expand her sense of when citizens possess an obligation to combat immigration injustice, and to encourage her to reconsider whether the “low-cost” requirement is appropriate given the injustices that migrants continue to face. I

have wondered whether it matters that some actions are costly because a government has imposed them in support of immigration injustice, and also whether the duties required by the welcome imperative that Brock defends are more expansive, and so more costly, than she suggests.

My goal too has been narrative shaping, a relatively low-cost duty I believe I (and other political theorists of migration) have: too much of the political theory of migration focuses on the harms to which migrants are subject, and expresses a pessimism in the face of anti-immigration policies. In outlining the myriad ways in which citizens, as individuals and in groups, are combatting immigration injustice, I am offering a plea to replace this pessimism with a celebration and encouragement of global welcome.

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