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Print Rights with a Thousand Masks: Migrant Vulnerability, Resistance, and Human Rights Law

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ABSTRACT

PrintRights, a co-operative of undocumented asylum seekers in Amsterdam, manufactured facemasks during the COVID-19 pandemic, first distributing them to undocumented migrants residing in the city's emergency shelter system and then selling them to the wider public. By distributing facemasks with messages, PrintRights framed its action within the human right to freedom of expression to legally resist alienage law prohibitions on employment. Engaging Judith Butler's theory, this article analyzes the relationship between PrintRights' resistance, vulnerability, and strategic engagement with human rights law. Drawing on fieldwork conducted with PrintRights, I explore how vulnerability discourse in human rights law can support undocumented migrant organizing.

KEYWORDS

undocumented; asylum seeker; vulnerability; resistance; COVID-19; freedom of expression; human rights; migrant organizing; performative citizenship; everyday resistance

RESUMÉ

PrintRights, une coopérative de demandeurs d'asile sans papiers à Amsterdam, a confectionné des masques pendant la pandémie de Covid-19, les distribuant d'abord aux migrants sans papiers résidant au sein du système d'hébergement d'urgence de la ville, puis les vendant ensuite à un public plus large. En distribuant des masques avec des messages, PrintRights a inscrit son action dans le cadre du droit humain à la liberté d'expression pour résister de manière légale aux interdictions d'emploi de la loi sur les étrangers. Mobilisant la théorie de Judith Butler, cet article analyse la relation entre la résistance, la vulnérabilité et l'engagement stratégique de PrintRights avec le droit relatif aux droits de la personne. S'appuyant sur un travail de terrain effectué auprès de PrintRights, j'explore la manière dont le discours de la vulnérabilité dans le droit relatif aux droits de la personne peut soutenir l'organisation des migrants sans papiers.

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INTRODUCTION

In the spring of 2020, a group of undocumented asylum seekers[1] residing in the shelter system in Amsterdam began manufacturing facemasks with packaging that bore human rights and political messages, such as "Freedom of Movement in the City." The co-operative calling itself PrintRights started

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[1]This group is composed of asylum seekers who are not currently in procedures. Either they have not succeeded on their initial proceedings (including appeal), or they have an open "Dublin claim." Dublin claimants are asylum seekers who have entered the European Union (EU) through another member state and, under the EU Dublin Regulation No 604/2013, must wait 18 months to

by producing 1,000 free reusable masks for shelter residents. After this project, PrintRights went on to sell their masks, as well as bags and T-shirts, to the public as "products linked to human rights." Directly printed on their products were messages such as "Housing Is a Human Right," "Migration Is Not a Crime," "United Against Racism," "No More Moria,"[2] and "No More Blah, Blah, Blah." The printed messages served a dual function—they communicated the group's political and human rights messages and strategically engaged another human right, the freedom of expression, to protect the distribution of those masks. In the Netherlands, employers are legally prohibited from employing undocumented migrants, including engaging them as volunteers in an organization, and can incur a fine if they are found to be employing migrants without work authorization (Berntsen et al., 2022, ch. 4). There are no employers of PrintRights, which by its own terms is a co-operative of undocumented migrants making and selling their own products. However, as the members of the co-operative are aware of the usual prohibition on employment, the right to distribute printed works (referenced in the name of the group) is engaged to further protect the members from deportability, or the immobilizing fear of detention and deportation (De Genova, 2002), by signalling the legality of their work.

The case study of PrintRights engages qualitative research with the group and political theory on rights-claiming to gain new insight on the human rights of undocumented migrants, the protection of which is perennially inconsistent and insufficient (Crépeau, 2014; Inter-American Court of Human Rights, 2003). Despite universal ambitions of human rights law, undocumented migrants are not included within the personal scope of application of all human rights legal provisions and instruments (e.g., exclusion of undocumented migrants from social and economic rights in the European Social Charter of the Council of Europe) and struggle to access the rights they have (Cholewinski, 2005; Dembour & Kelly, 2011). One way to motivate inclusion of undocumented migrants within the scope of legal protection is through judicial argumentation based on vulnerability. For example, as undocumented asylum seekers, the members of PrintRights are members of a group designated as "vulnerable" under European human rights law, and this designation has been utilized to argue for fulfillment of their basic needs and protection of their human dignity (e.g., Conference of European Churches [CEC] v. the Netherlands, 2014; MSS v. Belgium and Greece, 2011). Though vulnerability discourse is a powerful motivator for human rights protection (Al Tamimi, 2016; Baumgärtel, 2019; Fineman, 2010; Peroni & Timmer, 2013), it creates a discursive risk of reifying a group as definitionally vulnerable (Butler, 2016; Mayrhofer, 2020). The case of PrintRights is unique in that it problematizes monolithic understandings of both vulnerability and human rights law.

With the aim of furthering the project of Judith Butler, Gambetti and Sabsay's edited volume **Vulnerability in Resistance**, which challenges the binary conception of vulnerability as passivity versus resistance as strength/action, this article tracks the way

see if that state of entry will "take back" their asylum application before the asylum application can be lodged in the Netherlands. As such, Dublin claimants do not have an active asylum claim. In this article, I use the term **undocumented** because this is the term that this group uses to refer to themselves, and under Dutch alienage law, asylum seekers who have not succeeded in their claim or do not have an active claim are irregular or undocumented migrants. I begin here with the term **undocumented asylum seekers** to flag the discrepancy between formal use of the term and self-identification.

[2] "No More Moria" refers to the Moria refugee camp in Greece that was set on fire in the spring of 2020.

PrintRights' political and legal mobilization was entwined with different conceptions of vulnerability derived from Butler's essay in that volume (Butler, 2016). This case study problematizes Butler's assertion that her theory is incompatible with human rights law—that "once groups are marked as 'vulnerable' within human rights discourse or legal regimes, those groups become reified as definitionally 'vulnerable,' fixed in a political position of powerlessness and lack of agency" (Butler, 2016, pp. 24–25). The case study of PrintRights demonstrates how Butler's plural understandings of vulnerability can indeed open up new possibilities for harnessing vulnerability discourse to expand the scope of legal protection for migrants, including the rights that protect resistance.

Rather than merely reifying PrintRights in **embodied vulnerability**, human rights law framed its action (Leachman, 2013), uniquely engendering its resistance in light of its **embedded vulnerability** and **vulnerability to power**, concepts that will be developed in the following section. The right to distribute printed works encompassed within the freedom of expression is inhabited by the group as an organizing principle: to work within and through the law to resist their embedded vulnerability to poverty and homelessness due to the prohibition on work, and their vulnerability to state power through deportability. Butler's use of the word **resistance** is broad and could include various practices of activism and rights-claiming. For undocumented migrants, she notes, continuing to migrate, live, work, and be present are in themselves acts of resistance (Butler, 2016). This article will theorize the organizing of PrintRights as engaging practices of "everyday resistance" (Johansson & Vinthagen, 2019) and "performative citizenship" (Isin, 2017). This article suggests that a legal interpretation of the material scope of the freedom of expression that is attentive to undocumented migrants' vulnerability to power and embedded vulnerability could include practices of everyday resistance and performative citizenship within the scope of protection.

This case study contributes to the archive (Stierl & Tazzioli, 2021) of migrant social movements (Chimienti & Solomos, 2020; McNevin, 2011; Nyers, 2010; Oliveri, 2016; Rygiel, 2011), particularly the strategic use of law and human rights in undocumented migrant organizing (Abrego, 2008; Kawar, 2015; Nicholls, 2014). PrintRights engages counter-hegemonic legal frames in practices of performative citizenship to challenge dominant legal narratives about undocumented migrants (Abrams, 2014; Bhimji, 2014). Following Turner (2021) and other scholars (Anderson, 2008; Waite et al., 2015) who challenge assumptions of migrant victimhood, this article assumes the capacity of undocumented migrant organizers (Bloom, 2017) as a starting point, without understating structural disenfranchisement through easy appeals to "resilience" (Bracke, 2016). With an eye on the legal and political disenfranchisement of the undocumented, this article aims to reinforce the human rights legal protections for undocumented migrant resistance by bridging the rich traditions of socio-legal and sociological inquiry on migrant social movements with the burgeoning attention in legal scholarship for the political rights and political practices of migrants (Åberg, 2021; Anthony & Sterkens, 2018; Bender, 2021; Ziegler, 2017, 2021).

THEORETICAL FRAMEWORK

I read Butler's essay "Rethinking Vulnerability and Resistance" (2016) as calling upon

three highly overlapping and interactive discourses on vulnerability—embodied vulnerability, embedded vulnerability, and vulnerability to power—each of which uniquely engages her theory of resistance. Applying this three-part vulnerability framework to PrintRights not only reveals how vulnerability discourse in human rights law can motivate protection when providing for material, embodied needs but can also inform the scope of human rights that protect migrant resistance to their embedded vulnerability and vulnerability to power.

First, similar to how legal scholar Martha Fineman (2010) presents it in her work, Butler presents vulnerability as **embodied**. Humans share a universal bodily vulnerability and have a corresponding interdependency (Turner, 2021) and dependency on infrastructural support, experiencing vulnerability when unsupported. Butler connects this embodied vulnerability to mobilizations for the body's needs:

> We could certainly make a list of how this idea of a body, supported yet acting, supported **and** acting, is at work implicitly or explicitly in any number of political movements: struggles for food and shelter, protection from injury and destruction, the right to work, affordable health care, protection from police violence and imprisonment.
>
> *(Butler, 2016, p. 15)*

This embodied vulnerability can be utilized in legal discourse to engage the responsibility of the state as a duty-bearer of social and economic rights to provide for economic and social welfare of "vulnerable" subjects (Fineman, 2010). Embodied vulnerability does not signify helplessness or lack of agency (Waite et al., 2015) but, rather, is entangled with resistance (Huerta & Mclean, 2021). Butler introduces here the idea of "supported action": the vulnerable subject has a dependence on infrastructural support in order to engage in resistance, including basic needs, such as food and shelter, but also the infrastructure of protest, such as streets on which to march. But the vulnerable subject is both "supported **and** acting," sometimes protesting a lack of support itself, as seen in struggles for shelter, labour rights, or health care, or against police violence (Arendt, 1998; Butler, 2015; Fineman, 2010).

Second, **embedded** vulnerability draws attention to the reality that embodied vulnerability is not equally experienced throughout the human population (Cole, 2016) but varies greatly based on social processes, such as discrimination and racialization (Oliveri, 2018), and on legal processes, such as the exclusion of undocumented migrants from social protection that derives from migration and alienage law (Fineman, 2010). The COVID-19 pandemic, for example, while revealing a universal embodied vulnerability, has had a disproportionate impact on racialized people and undocumented migrants (Hasan Bhuiyan et al., 2021; Kumar et al., 2021; Niezna et al., 2021). The embodied vulnerability to the virus is exacerbated by the embedded vulnerability of being undocumented. Embedded vulnerabilities can also change the object and strategies of resistance, as can be seen through the specific examples of undocumented migrant organizing during the pandemic. Migrants mobilize response not only to the pandemic but particularly to the disproportionate impact of the pandemic on undocumented migrants (Irwin & Del Monte, 2020; López-Sala, 2021; Palma-Gutierrez, 2021). Performative citizenship (Isin, 2017; Zivi, 2012) or "acts of citizenship" (Isin & Nielsen, 2008) can be theorized as a form of undocumented migrant resistance uniquely tied to their embedded vulnerability. When performing "acts of citizenship," migrants

resist the exclusions of migration law by performing the rights and duties that would traditionally be recognized with formal citizenship. Excluded individuals harness performative citizenship to present themselves as members of a community whose identity is premised on their exclusion (Zivi, 2012).

Third, Butler describes a **vulnerability to power**, particularly state power, which she illustrates by discussing public acts of resistance and organizing where participating individuals are vulnerable to policing when demonstrating in public. This concept is particularly relevant for undocumented migrants, who are definitionally vulnerable to state power, a phenomenon captured through De Genova's concept of "deportability" or "the possibility of deportation, the possibility of being removed from the space of the nation-state" (De Genova, 2002, p. 439). In light of this deportability, while resistance can be conceptualized as a dramatic and confrontational event, acts of "everyday resistance" can be "even mundane kind[s] of practices of accommodation and non-confrontation" that are "neither individual acts, nor public confrontations with authorities" (Johansson & Vinthagen 2019, pp. 2–3). Johansson and Vinthagen explore this concept, for example, in the Palestinian practice of Sumud, which they translate as maintaining a permanent presence on the land (Johansson & Vinthagen 2019, ch. 9). This persistent presence is neither direct confrontation nor passivity, but the authors argue for a form of everyday resistance. Awareness of vulnerability to power and embedded vulnerability permeates the resistance of undocumented migrants and, as I will argue in this article, can be used to understand the scope of the freedom of expression for undocumented migrants, similar to how embodied vulnerability discourse informs an analysis of socio-economic rights.

METHODOLOGY

The article engages qualitative case study to gain insight from the political and expressive practices of undocumented migrants to inform the interpretation of the scope of freedom of expression for human rights legal analysis (McInerney-Lankford, 2017; Webley, 2016). I used triangulated data collection methods (Ayoub et al., 2014) involving participant observation, semi-structured interviews, and document analysis to understand how the members of PrintRights used human rights in their claim-making. Participant observation for this research took place at the PrintRights workshop, at protests against the closing of the emergency shelter, and during webinars where group members spoke. Documents reviewed included PrintRights products, social media posts from the group, public media about the group, and internal communications regarding legal strategy.

To contextualize my presence in the field, in 2019, I began participating with the Amsterdam City Rights organization as a researcher. Amsterdam City Rights is a collaboration between documented and undocumented people in Amsterdam and is an offshoot of the civil society organization Here to Support, a citizen solidarity organization that will be discussed at greater length in the "Data and Discussion" section. PrintRights was originally organized during the pandemic within Amsterdam City Rights' weekly Zoom meetings. I was introduced to PrintRights by a citizen supporter of the group who worked with Here to Support and Amsterdam City Rights (PR6).[3] I for-

[3] Because the group of participants was small, in order to protect their privacy, I use only the indication "PR" (for PrintRights) with the interview number (e.g., PR6) as pseudonyms of interviewees.

mally requested permission from the PrintRights co-operative to conduct this research. The members approved the research, and thereafter they asked if I could come volunteer to address envelopes to mail facemasks. Throughout fall 2020, I visited the workshop weekly to volunteer and conduct semi-structured recorded interviews. The interviews were loosely structured on questions based on how participants got involved with the co-operative, how they conceptualized their participation, and what they thought about the different messages on the masks. In December 2020, new cases of infection spiked in the Netherlands. On December 14, 2020, the Dutch prime minister, Mark Rutte, announced a lockdown period, which lasted until the end of April 2021. During the lockdown, I ceased coming in person to help with mask distribution and instead interviewed remotely. Five of the interviews were conducted in person, four were via Zoom, and one was over the phone.

PrintRights aims to keep its membership to 10 people. I was able to interview six active members (PR1–5 and PR7), two former members (PR8 and PR10), and two citizen supporters from Here to Support (PR6 and PR9). PR6 and PR9 were active in strategizing the initial concept of PrintRights, including engagement with the right to distribute printed works. Among the interviewees, six were men and four were women. Interviews were conducted in English, except for one, which was conducted in Amharic through a translator. Except for one, the members of PrintRights are from different countries in Africa. The group is diverse in age, ranging from young adults who came to Europe as unaccompanied minors to one member over age 50. The members identified themselves as undocumented migrants, all of them having had either a failed asylum procedure or a pending Dublin claim. I reinforced awareness of my role as a researcher by regularly discussing the progress of the research with members. While participating in the group, I was never completely immersed; I was never referred to as a member nor included in the co-operative's formal meetings (Spradley, 1980). When I began the case, I was not aware of the prominent role the right to printed works played as an organizing strategy. This concept emerged during the interviews. Similarly, the relevance of Butler's theory on vulnerability in resistance emerged during data analysis.

DATA AND DISCUSSION

In the data on PrintRights, themes of vulnerability, resistance, and law interacted with each other—discussions of vulnerability flowed into narratives of resistance, and law played a role in both creating vulnerability and protecting PrintRights' organizing. I will begin discussing the data by showing how the law contextualizing PrintRights interacts with different conceptions of vulnerability and challenge Butler's assertion of reification in vulnerability by law through the example of the right to printed works being used to facilitate resistance. The discussion then follows the temporal arc of the case study. PrintRights' initial 1,000 masks action is shown to be responsive to the members' deportability—a vulnerability to power. Aware of this vulnerability to power, in the second wave of PrintRights, when the co-operative began to sell products, it engaged practices of everyday resistance and performative citizenship under the right to distribute printed works to respond to their embedded vulnerability without making them increasingly vulnerable to deportation and detention.

Legal Context

The vulnerability and resistance of Print-Rights is contextualized by multiple legal orders, case decisions, and bodies of legislation.[4] In this section, I discuss three aspects of this legal context that are necessary to understand the case.

The first is Dutch alienage law,[5] which throughout the 1990s became increasingly restrictive (Van Walsum, S, 2011), starting with the criminalization of undocumented migrants' employment through employer sanctions (Wet arbeid vremdelingen, art. 2) and culminating with the passage of the 1998 Linkage Act (Koppelingswet). The Linkage Act coupled access to social programming in the Netherlands to lawful migration status (Zwaan et al., 2018, ss. 5.4.3, 8.8.1). The goal of the act was to ensure that undocumented migrants were discouraged from remaining in the Netherlands by preventing them from "becoming rooted" (Ombudsman Metropool Amsterdam, 2021), pushing undocumented migrants further to the margins of society (Slingenberg, 2021). Alienage law also includes the deportation and detention of migrants. In addition to the incorporation of the EU Return Directive on migrant deportation (2008/115/EG) into domestic law and article 5 of the European Convention on Human Rights regarding migrant detention, the Dutch Foreigners Law at article 50, paragraph 1(a), states that "officials charged with the supervision of aliens are authorized to detain persons on the basis of facts and circumstances which, measured by objective standards, give a reasonable suspicion of illegal residence" (Zwaan et al., 2018, s. 8.3.3). The Netherlands embeds vulnerability in the status of being undocumented by denying undocumented people access to social programming and employment. Through detention and deportation, and the migration policing that supports it, undocumented migrants are further rendered vulnerable to the power of the state.

Second, while the national government of the Netherlands has trended towards an increasingly restrictive alienage law regime, municipalities have exhibited varying methods of providing services for migrants residing within their cities, including with the support of international human rights law (Baumgärtel & Oomen, 2019; Durmuş, 2020; Oomen & Baumgärtel, 2018; Spencer, 2020; Spencer & Delvino, 2019). In an effort to seek shelter and make themselves visible, in September 2012, a movement of undocumented migrants in Amsterdam called We Are Here employed a strategy of squatting and claiming public spaces in protest of national migration and alienage law (Hajer & Bröer, 2020). The municipality of Amsterdam responded to these protest actions in 2013 by providing an initial bed, bad, brood–, or "bed, bath, bread"–style shelter to provide very basic amenities to some of the We Are Here participants (Ghaeminia, 2013; Kamerman, 2012). In parallel to this municipal provision, in 2013, the Diaconate of Amsterdam, which had long organized in solidarity with We Are Here, joined the Council of European Churches to lodge an ultimately successful collective complaint with the European Committee on Social Rights against the Netherlands for refusal to provide basic shel-

[4] Describing legal orders as "multiple" or "plural" is a response to Butler's theoretical framing of law as reifying the subject in vulnerability. By elaborating law here in its plurality, I hope to then show how there is space in legal analysis for plural understandings of vulnerability and that such plural understandings can inform a legal analysis of resistance. As this section is framed around Butler, I do not engage the literature on legal pluralism directly, though others have described the interplay between Dutch restrictive alienage law and municipal shelter system in Amsterdam in the context of legal pluralism (e.g., Baumgärtel & Oomen, 2019).

[5] **Alienage law** refers to legislation that regulates individuals differently based on their citizenship, migration status, or undocumented status (Bosniak, 2006; Shachar, 2020).

ter, food, and clothing to undocumented migrants under the European Social Charter.[6] The reasoning of the resulting CEC v. the Netherlands decision relies on a human rights discourse of embodied vulnerability and human dignity to expand the restrictive personal scope of the European Social Charter to adult undocumented migrants in certain situations where human dignity is threatened:

> The persons concerned by the current complaint undeniably find themselves at risk of serious irreparable harm to their life and human dignity when being excluded from access to shelter, food and clothing … access to food, water, as well as to such basic amenities as a safe place to sleep and clothes fulfilling the minimum requirements for survival in the prevailing weather conditions are necessary for the basic subsistence of any human being.
>
> *(CEC v. the Netherlands, 2014 , para. 122)*

The committee's decision in favour of the complainants led to the creation of a nationally funded shelter system—the National Foreigners Provision shelter system (Landelijke Vreemdelingenvoorzieningen or LVV) in major cities in the Netherlands. This 18-month shelter program builds on the original bed, bad, brood model but with a wider scope and national funding. This legal context is relevant for PrintRights because many of its members resided in the shelter system. This human rights intervention incorporates human rights argumentation based on embodied vulnerability of homelessness and particularly addresses the way this homelessness is embedded in an experience of being undocumented.

The third legal aspect of this case study is the right to distribute printed material as a facet of an individual's freedom of expression. The relevance of this right emerges from the field, originating with the organization Here to Support, which is a solidarity organization consisting of Dutch citizens who originally organized to support the work of We Are Here, described in the previous paragraph. In 2015, Here to Support engaged legal counsel to explore openings in the law that would allow undocumented people to make money in a legal way. They found that there is broad protection for "the right to sell and distribute printed works." This right falls under the freedom of expression in both Dutch constitutional law (art. 7) and European and international human rights law (e.g., European Convention on Human Rights, art. 10; International Convention on Civil and Political Rights, art. 19), which is also sometimes referred to as the freedom of speech, or speech and expression. The freedom of expression protects "the freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print" (Pugach v. Belarus, 2015, para. 7.3). Undocumented migrants are (at least formally) protected by this right, though there is little to no caselaw on this question in the international courts (cf. Sharif Baban v. Australia, 2003). One of the citizen members of Here to Support, who was also active in PrintRights, recounts the initial organizing initiative around this right:

> We did extensive research for what was possible for undocumented migrants to at least earn some money in a legal way. I never talk about salary, or income, because I think that is very difficult. … But what undocumented migrants can do, is they have the right to speak, they have the freedom of speech and the freedom of press. … Nobody can stop you from making a transaction if it's about a printed matter.
>
> *(PR6)*

[6]Complaints before the European Committee on Social Rights can only be brought collectively by groups of organizations, not by individuals.

After employing this strategy in a successful cookbook project to sell and create cookbooks with We Are Here in 2016, the idea was given a second life during the pandemic by PrintRights. The members of Here to Support together with activists from We Are Here served as "legal intermediaries" (Miaz, 2021), who interpreted and made use of the freedom of expression in action and communicated this use of the right to the PrintRights co-operative. During the first wave of the pandemic, when the members of PrintRights approached Amsterdam City Rights initially to say that they wanted to make masks for people in the shelter, Here to Support suggested organizing this action under the right to distribute printed works, and thus PrintRights was chosen as the name for the co-operative and engaged as an organizing principle.

While migration and alienage law create vulnerability to power, and social-economic rights extend protection based on a discourse of embodied vulnerability, freedom of expression (the right to distribute printed works) was used strategically to protect migrant mobilizing in a way that was responsive to their legal vulnerability. In this way, the law has a plural relationship with vulnerability—it causes embedded vulnerability and vulnerability to power; it requires the state to address the basic needs of embodied vulnerability; but even more, it protects the organizing practices of vulnerable migrants to resist legal regimes that make them vulnerable.

Mobilizing Vulnerability to Power Through Supported Action and 1,000 Masks

It is against this backdrop that PrintRights began to manufacture and distribute 1,000 facemasks within the shelter system during the pandemic. Many of the members of PrintRights were either residents in the LVV shelter system (created through the CEC v. the Netherlands decision, discussed above) or a temporary emergency COVID-19 shelter system that was designed to keep people off the streets at night during the pandemic. In May 2020, the national government announced that facemasks would be mandatory on public transportation, which made undocumented shelter residents more vulnerable to detention and deportation:

> It was far beyond protecting ourselves from the virus. Because from the virus I know if you have a facemask, we can be okay, but if you don't have a facemask on the train, we could have a fine. We don't even have money to buy facemask. So, a fine and you get in trouble with the police. Deportation. Your procedure will be disturbed. That was just the kind of mechanisms I was thinking about, so we can create something, we can use our own creativity to solve these kinds of problems.
>
> *(PR10)*

The motivation for the 1,000 masks project as discussed by PR10 was primarily in response to vulnerability to migration policing and a lack of money to buy facemasks due to the prohibition on employment. PR2 identified the inability of undocumented people to buy masks and conform to the regulations due to the prohibition on employment:

> In the end, there were some undocumented people who didn't have money to buy masks because they were not receiving any money and they cannot work as well. … So, we got approval from the Amsterdam City Rights that we should make masks, 1,000 masks, that we can give to the people that are living in the shelters, who cannot be able to buy this mask.

As discussed in the "Legal Context" subsection, the prohibition on employment creates an embedded vulnerability by making a certain group of people unemployable, and is also tied to vulnerability to power because this is a state-enforced prohibition that is

highly policed. In light of this vulnerability, material and technical support were necessary for the 1,000 masks action. Butler's concept of supported action is applicable here, not to prescribe a teleological account of resistance or as causation but, rather, to reveal undocumented people's need for support in order to organize given the extent of their embedded vulnerability and vulnerability to state power. To organize and fund the initial action, the 1,000 masks project, Here to Support facilitated start-up grants from social organizations and from the municipality of Amsterdam.

The members of PrintRights secured sewing machines, fabrics, and other supplies; developed a pattern; and established an assembly line. Space to set up its workshop was lent to the co-operative by different community centres, though often on a temporary (weekly or monthly) basis. The first fabrics purchased were African prints. As recounted by most of the members, within roughly one month, they manufactured 1,000 reusable masks and prepared detailed usage instructions, which came in a pamphlet with the masks bearing the slogans "Right to Mobility in the City" and "Freedom of Movement in the City." The legal technology of the right to printed works is part of the infrastructure of support framing this action. As discussed, it informed the group's name and the inclusion in the packaging of the political claim to be able to move through the city without fear of being detained. The members distributed two masks to each of the 500 residents of the shelter system. When asked about the role of citizens working in solidarity with the group, all undocumented members of the group reacted positively: "They have access that we need" (PR7); "They are also working to serve the community" (PR5). PR4 specifically emphasized the need for citizen volunteers to contribute their language skills for communicating with the Dutch public while emphasizing that they do not interfere with the co-operative's processes of decision making, task distribution, and growth plans.

Embodied Vulnerability and the Pandemic: Resistance as Performative Citizenship

The story of PrintRights does not end with the 1,000 masks project. After this initial action, PrintRights decided to continue with the production and sale of its masks. PrintRights reinvested half of its initial proceeds in the co-operative, expanding to other products, such as bags and T-shirts, and distributing the remaining proceeds among the members. With money raised through the sale of masks, PrintRights was able to rent its own workshop to have a more permanent location. This marks an important transition in the strategy of the group—it went from distributing masks within the undocumented community for free to selling products, particularly facemasks, to the greater public during the first and second waves of the COVID-19 pandemic. While interviewees identified that homelessness and lack of access to health care due to their undocumented status made them increasingly vulnerable to COVID-19, embedding their vulnerability to the virus in their undocumented status, they also noted that they shared an embodied vulnerability to the virus with the wider Dutch society. This shared embodied vulnerability was discussed as an equalizing force, one that PrintRights responded to through performative citizenship:

> My involvement with PrintRights started because of [the] corona [virus]. After noticing that it is something that is needed by the people. We are doing it just for the sake of supporting the community. … Corona doesn't distinguish anyone, so everyone wears the mask and likewise our human rights advocacy work doesn't distinguish a separate group,

> instead it's for the whole community, for the whole people in the Netherlands.
>
> *(PR5)*

This new, shared vulnerability to the virus created a demand for facemasks beyond the shelter system. PR5 connected this universality of vulnerability to the universality of human rights messaging on the masks (e.g., "Housing Is a Human Right") and his service to the community. PR5 discussed later that every mask he made was saving a life, emphasizing the superior craftsmanship of PrintRights' double-layered masks. In the following quote, PR3 also emphasized the service PrintRights has been providing in a time of universal embodied vulnerability:

> We wanted to be part of the government to show that even the migrant people, they care, and they can also fight as the government, try to fight [the] corona [virus]. We can team up together and fight the disease, all of us because it [the virus] is involving everybody, not only the Dutch, or the Dutch people. It involves everybody, it is not specific for the white people.

PR3's and PR5's quotations reflect a performance of citizenship in response to this wider embodied vulnerability. PR3 invoked migrant contributions to the government through the service they are providing, resisting the prevalent reality of the government's exclusion of undocumented migrants via migration and alienage law. Indeed, PR3's quote is heavy with civic duty, harnessing common embodied vulnerability while acknowledging a prevailing narrative of separateness between the "migrant people" and the "white" "Dutch people."

This juxtaposition between the universality of embodied vulnerability with the embedded vulnerability of being undocumented is harnessed in a resistance through performative citizenship. Performative citizenship is engaged by the group to respond to need within society and, in doing so, challenging negative narratives regarding the undocumented. A recurring theme raised by group members was tying the work of PrintRights to resisting the narrative that undocumented migrants are criminals or are a cost or liability to Dutch society:

> Beyond being part of PrintRights, beyond being part of this movement, my ultimate objective is to show another face of the words **undocumented migrant** or **refugee**. Because mostly, there is a kind of stereotype when this is used, people imagine mostly negative, you understand? But, if you can change this into something more positive, it will maybe help people to be more welcoming, help people to start life easier than what we go through. I am not fighting for myself; I am fighting for generations to come.
>
> *(PR1)*

Changing negative narratives was sometimes identified by interviewees as the goal of PrintRights' work. One of the messages that PrintRights printed on the handle of a bag was "Migration Is Not a Crime," because "some people think we are criminals, but we are not criminals" (PR3). This message was identified by multiple members of the group as the message that resonated most with them. Along these lines, at one point, when PrintRights was operating out of a community centre, the group members intercepted the theft of a laptop from the centre. News of this interception came in the paper and was widely circulated by the group to promote their positive contribution within Dutch society, directly countering the stereotype of their criminality.

Narratives that emphasize the deservingness or merit of a group of migrants require reflection, as they raise ambivalence for their potential to exclude (Anderson, 2013; McNevin, 2013). While these narratives can create "niche openings" in the law through regularization schemes for undocumented migrants that appeal to the meritocracy of

good potential citizens (Nicholls, 2013), this technique can leave behind migrants who do not appeal to frames of deservingness (Chauvin & Garcés-Mascareñas, 2014; Fiorito, 2021; van Meeteren & Sur, 2020). However, deservingness narratives are not only legally productive; they can also be politically productive. The members of PrintRights saw themselves as cast into the role of criminal migrants and challenged that frame not through a typical trope of the hardworking migrant, exploitable to neoliberal capitalism, but through a practice of civic engagement. PrintRights emphasizes the assistance they provide to the government, to citizens, and to each other in a performance of civic duty that refutes easy classification or dismissal. The "niche opening" in the law that they inhabit is not a regularization scheme for only a few meritorious migrant heroes; rather, here it is a repurposing of the freedom of expression, to open up a political space to challenge their embedded vulnerability and vulnerability to power.

The "Nothingness" of Being Undocumented as Embedded Vulnerability: Work as a Practice of Everyday Resistance

While the societal contribution of PrintRights resisted negative stereotyping through performative citizenship, the activity of work itself can be theorized as a practice of everyday resistance. The shelter system addressed the immediate embodied vulnerability by providing housing and food, but the shelter could not address the embedded vulnerability, the "nothingness," which interviewees said resulted from the combined prohibition on work and the strict regulations regarding the emergency shelter system, such as the set times to leave in the morning and arrive in the late afternoon, which limit their possibility for activity. As discussed in the "Legal Context" subsection, human rights argumentation based on embodied vulnerability motivated and justified the provision of shelter to undocumented migrants in Amsterdam. Having shelter is, of course, a vital support for PrintRights. Nonetheless, even after the provision of shelter, a larger embedded vulnerability of the undocumented is conveyed by interviewees. It is in this "nothingness" that we can see the risk of reification in vulnerability that Butler refers to. PR8 recounts this as a lack of humanity and a rightlessness:

> You just sleep, eat, it doesn't matter where you sleep and what you eat and what you dress, everything doesn't matter. When you do nothing in your life, you are not human. That is why you cannot have any rights.

The nothingness recounted by PR8 is connected to a lack of activity, which she later clarified was due to the prohibition on work. Other interviewees connected this nothingness to their lack of legal migration status and minimal provision of shelter by the government. PR7 analogized the lack of status and shelter system to imprisonment because the lack of alternatives and choice leads to suffering:

> When you stay here without status, you are like in jail, you are like in prison. The difference is, you are just moving out of your house, go and explore, and then come back to the prison. Because you don't have an alternative, but you are in jail. There is no difference. So, we are here, we are suffering too much.

PR7 and PR8 also expressed in their interviews the importance of PrintRights for filling this nothingness. This juxtaposition between nothingness and activity is echoed by PR4:

> The day is empty. Thinking in a negative way is really bad. I saw people suiciding, trying to do stupid things. But to be busy, every day at least two or three hours, working, doing something nice, talking with others, eating together or something, it really changes things.

For PR4, to be busy, and particularly, to be busy in an activity in a group, "changes things." PR1 resisted the nothingness by creation, by making something:

> Being an undocumented migrant is like a death sentence. It is something very large to compare to, but it is because there is a lot of things we can do, just with a machine, a scissors, plastic little, little things, we are able to provide over 4,000 masks.

This nothingness is both similar and distinct from Hage's concept of **stuckedness**, which describes an "existential immobility" that can only be resisted through "waiting it out," for example, waiting out an long-lasting asylum procedure (Hage, 2009; McNevin, 2020) or waiting for a political change that brings a general pardon or large-scale regularization of migration status. Stuckedness fits the description of PrintRights' members in relation to their migration status, such as waiting for the Dublin Regulation's 18-month take-back period to pass before lodging an asylum application. However, the nothingness described by interviewees is not framed in terms of the temporality of a horizon regularization; rather, nothingness is presented as the counterpoint of activity. PR1 and PR4 both recounted that their simple daily activities with PrintRights addressed this imposed nothingness. Rather than (re)joining a governmental temporality of regularization through waiting, PrintRights interrupted an imposed regulatory nothingness with creation, with coming together, and even with eating together.

In this way, PrintRights also interrupts the risk of reification of vulnerability in law. The group engages the right to distribute printed works as a practice of everyday resistance to the nothingness of being undocumented and, particularly, the prohibition on employment. In the following quote, PR8 identifies the prohibition on working as a fundamental problem in the lives of the undocumented:

> You know, with all of these messages, "No More Blah Blah Blah," "No More Moria," it just is a message that people want to hear from us. But if we go deep in this situation, I mean, we need to do something. We need to spend our time working. … And even if you can buy one brood [bread] from money that you worked for, it is not about money, it is about feeling. Even if there is no money, just someone who brings food for someone else, but we know we did something. This is what we eat now. It is ours. It is for us. We did it. This is very important.

PR8 identified the dual nature of the political messages on the facemasks; they communicate and advocate for a political message, but more importantly for PR8, they also performatively engage a right that protects the members' participation in PrintRights. The problem of the prohibition on employment goes "deep in this situation," as PR8 stated, and was one of the most frequent subjects of discussion by interviewees, despite never being asked about in interview questions. Though the work of PrintRights is not prohibited under Dutch alienage law because it is not employment, the right to distribute printed works offers an affirmative legality to a practice that is otherwise in a grey area of the law. The co-operative has harnessed a freedom that is at the bedrock of democracy and repurposed it to access the socio-economic right to work. By engaging the right to distribute printed works, PrintRights members respond to the nothingness of being undocumented in a way that is aware of their vulnerability to power.

Notably, the undocumented members of PrintRights were consistent in not categorizing what they did as "work" and emphasizing that they did not do it for money. In response to the specific question on how they characterized their involvement with PrintRights, I received responses such as "delivering messages," "protest," "creative protest," "creation," and "service":

> That is why I say, some people might take it as work, but me, even if I come, I work, I don't get anything that is not a problem for me. Because, health-wise, it is really helping. Waking up in the morning, finding yourself in bed, doing nothing, and then the next day another one, psychologically it is torture, it is totally torture. And having something to do, whether having something or not, it has really helped me.
>
> *(PR3)*

This engagement in an activity that looks like work but is not legally prohibited employment could be theorized as a practice of "everyday resistance" (Bhimji, 2014; Johansson & Vinthagen, 2019). It is the performance of the activity of work that fills the nothingness of being undocumented and is also highly responsive to this group's vulnerability to power. Bloom applies this idea further in her theorization of vulnerability and the challenge of the noncitizen, noting that "in the case where a person's rights, political agency, and even being, are denied, even mundane activities can be politicized and challenging" (Bloom, 2017, pp. 136–137). By framing their co-operative within the right to distribute printed works, the members of PrintRights have found a legal and political space in which they can resist the alienage law that makes them vulnerable. They access a socio-economic right, the right to work, via a civil and political right of the freedom of expression. In this environment, where employment is prohibited, engaging in an activity that looks like work but is not prohibited employment is itself a form of resistance.

CONCLUSION

The pandemic has exacerbated vulnerabilities in the lives of undocumented migrants in the Netherlands, and as demonstrated in the case study of PrintRights, it has also created new opportunities for resistance. The members of the co-operative resisted their increased vulnerability to policing by organizing the 1,000 masks campaign, a campaign that illustrates Butler's concept of supported action. Though undocumented migrants were disproportionally vulnerable to the pandemic due to embedded vulnerability, the pandemic heightened their awareness of an embodied vulnerability shared with Dutch citizens. They responded with a performance of citizenship. The mobilization of the right to distribute printed works was a means for undocumented people, who were vulnerable to power through deportability, to frame their resistance within a protection from state power through the freedom of expression. By framing their actions within this legal right, their everyday action of performing work could be conceived of as political speech—a more highly protected form of expression than commercial speech (Perinçek v. Switzerland, 2015).

The case study of PrintRights demonstrates how embodied vulnerability discourse in law can form part of the supports for resistance by, for example, requiring the state to provide for basic needs, such as shelter. But there is also a truth in Butler's critique of vulnerability discourse in law—the members of PrintRights recount a "nothingness" of being undocumented and in the shelter system that echoes Butler's concept of reification in vulnerability. The shelter system can fix neither embedded vulnerability, due to alienage and migration law, nor vulnerability to the power of migration policing. But laws, like vulnerabilities, are plural. Members of PrintRights challenge their vulnerability to migration and alienage law by performatively invoking another, separate, legal provision: the right to printed works. I have argued in this article that this plural engagement with human rights opens the possibility for a plural engagement with vulnerabil-

ity discourse in human rights law. If protections of migrant rights to expression, assembly, and association are contextualized to the embedded vulnerability and vulnerability to power that undocumented migrants live in, the scope of these rights can protect the contextualized resistance of the vulnerable subject. For a group that is vulnerable to migrant deportation, political expression may look less like a speech at a rally and more like a message printed on a facemask. For a group of undocumented migrants embedded in vulnerability through the prohibition on employment and enforced inactivity, resistance may look like the act of work itself.

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