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## **Dual Citizenship in an Age of Mobility**

**Thomas Faist  
Jürgen Gerdes  
Bielefeld University**

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*The Migration Policy Institute is an independent, nonpartisan, nonprofit think tank dedicated to the study of the movement of people worldwide.*

## About the Transatlantic Council on Migration

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## Introduction

In the past, including the recent past, policymakers considered dual citizenship a problem. Leading politicians of previous centuries saw it as an abhorrence of the natural order, the equivalent of bigamy. Citizenship and political loyalty to the state were considered inseparable. Policymakers worried that dual citizens would not integrate into the country to which they had emigrated but rather would maintain exclusive loyalty to the country of original citizenship. And, in times of war in the 19th and early 20th centuries, they feared “foreign” interference by citizens belonging to the enemy. Moreover, democratic legitimacy was at stake. Policymakers feared that dual citizenship would violate the principle “one person, one vote.” Also, diplomats were worried that they could not protect their citizens in the country whose citizenship the newly naturalized citizen also held.

Yet, over the last few decades, an astonishing change has taken place: an increasing number of policymakers regard dual citizenship not as a problem for integration, legitimacy, foreign policy, and diplomatic protection, but rather as a possibility that needs to be negotiated from various standpoints, ranging from simple pragmatic tolerance to active encouragement. Certainly, dual citizenship is not a completely new phenomenon, but we have witnessed its rapid spread only recently. More than half of all the states in the world, countries of immigration as well as emigration, now tolerate some form or element of dual citizenship (see Figure 1). This policy brief goes beyond statistical trends to the heart of these changes and how best to think through the policy answers.

Whether dual citizenship should be allowed frequently comes up as a question of immigrant integration. Particularly with regard to dual citizenship, integration within and loyalty to a certain nation-state could be perceived as exclusive or viewed in a European (or even global) framework of human, civil, and political rights. The answer to the question of whether dual citizenship helps or hinders integration crucially depends on both how one defines integration and how one views the mutual relationship between naturalization and integration. Viewing integration as exclusive loyalty of immigrants to one state and one state only amounts to a zero-sum game: either one is in or one is out. Such an approach leaves no room for intermediate conditions. By contrast, toleration or even recognition of dual citizenship corresponds with an understanding of integration in the European Union (EU) as a “dynamic two-way process of mutual accommodation by all immigrants and residents of Member States.” This is the first of the common basic principles of immigrant integration policy, which the European Council agreed upon in November 2004. Citizenship of the residence state provides immigrants with a voice on an equal basis with native-born citizens. If the “participation of immigrants in the democratic process and in the formulation of integration policies and measures ... supports their integration,” as argued and laid down as another common basic principle on immigrant integration of the European Council, full political inclusion of immigrants is a paramount goal (Commission of the European Communities 2003). The Conclusions of the German Presidency added that general integration policies need to be adopted by all Member States.<sup>1</sup>

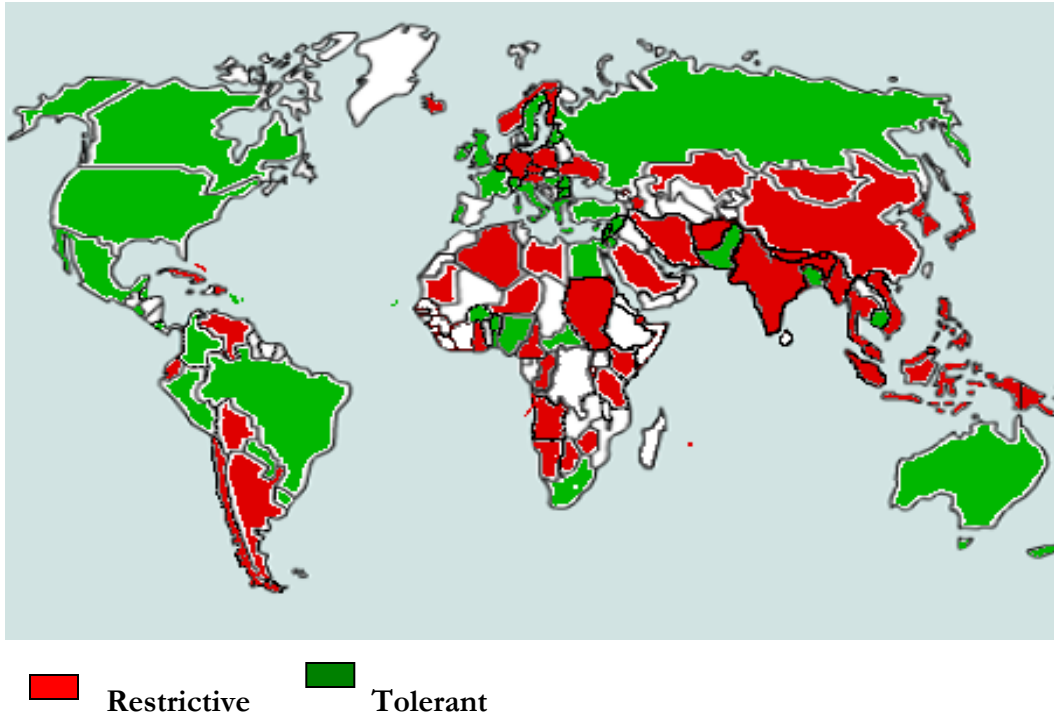
This policy brief advocates, in line with EU principles on immigrant integration, that the toleration of dual citizenship can be a tool to promote naturalization. In essence, it is an instrument to close the gap between the resident and the voting populations. Those who are

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<sup>1</sup> 287th Council Meeting, Justice and Home Affairs, Luxembourg, 12–13 June 2007.

subject to the law should at least have the opportunity to participate in the decision-making process by means of democratic rights. There are only two ways of achieving this outcome: by granting the same political rights to immigrant residents — for example, the right to vote on the national level — or by further liberalizing naturalization procedures. One of the major instruments for naturalization is dual citizenship.

**Figure 1. Restriction and Tolerance toward Dual Citizenship around the World**



*Note.* See Appendix B for a country list and definition of terms.

*Source.* Author's depiction, based on United States Office of Personnel Management, Investigations Service, "Citizenship Laws of the World," <http://opm.gov/extra/investigate/IS-01.pdf>.

## Defining Dual Citizenship

Dual citizenship means that individuals combine citizenship in and of two nation-states. In principle, individuals may hold even more than two citizenships; hence the terms "multiple" or "plural" citizenship. International law stipulates that, as a matter of each nation-state's sovereignty, it determines its citizens according to its own law. The only conditions for international recognition of citizenship are that a so-called genuine link exists between the state citizen and the respective state, and that the self-determination of other states is likewise respected. Further restrictions may arise only out of international agreements.

How widely accepted the principle of nation-state sovereignty in citizenship law is can be well observed in the European Union. In contrast to far-reaching Europeanization in a wide range of policy fields, only the individual EU Member States can decide on access to and loss of state citizenship. In the immediate future, policymakers face the problem of how to

deal with the increasing tolerance of dual citizenship that is embedded in international law: rules for gender equality; combinations of rules for citizenship acquisition; and considerations concerning immigrant integration. All of the trends associated with these factors call for explicit legislation.

Until a few decades ago, it was commonly held international consensus that dual citizenship should be avoided as much as possible, as reflected both in the citizenship laws of single states and in bilateral and international conventions and agreements. One brief statement by the League of Nations in 1930 summarizes the dominant international perspective throughout most of the 20th century: “All persons are entitled to possess one nationality, but one nationality only.”

States regarded dual citizenship as a potential catalyst for treason, espionage, and other subversive activities. From the mid-19th century until long after World War II, states adhered to two iron laws. The first was that losing one’s original citizenship was the price for adopting another. Most states expatriated their citizens automatically when they became naturalized in another state, but they also expatriated them if there was significant evidence of political or social loyalty to another state, such as entry into military service or the assumption of a political office in the other state or even participation in political elections abroad. In some cases, immigration countries made naturalization conditional on the relinquishment of the previous citizenship. The second iron law by which many states attempted to overcome the problem of dual citizenship ensuing from birth in their territory was that such individuals, on reaching maturity, had to choose one of the two citizenships or they were otherwise expatriated.

What changed? Dual citizenship usually arises whenever a person is born within the territory of a country where the law of territoriality (*jus soli*) holds, but whose parents are citizens of a country that observes the blood principle (*jus sanguinis*). Here, developments in gender equality under the citizenship law were the main legal mechanism for expanding dual citizenship. Previously, the citizenship status of women had entirely depended on their husbands as they automatically acquired their husbands’ citizenship upon marriage. The right to retain their own citizenship, independently of their husbands, has been taken up in the citizenship laws of a growing number of countries. At the same time, naturalization for female spouses has become easier so as to afford better protection to families. For example, it is frequently the case that a child can be given the citizenship of either parent. All of the 15 longstanding EU Member States (EU-15<sup>2</sup>) accept the dual citizenship of children of mixed-nationality marriages. However, in cases of binational children born out of wedlock, the Scandinavian countries, Austria, and the Netherlands still impose some restrictions regarding transmission of the father’s citizenship.

Furthermore, in recent years, European immigration countries have increasingly made naturalization less conditional on the relinquishment of previous citizenship, as reflected in changes to national citizenship laws, relaxation of administrative practices, and more generous interpretations of international agreements. For the most part, governments have

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<sup>2</sup> The EU-15 encompasses Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden, and the United Kingdom.

regarded easing citizenship acquisition as beneficial for immigrant integration and as a requirement of democratic legitimacy.

Legislative changes have facilitated citizenship acquisition for the children of immigrants (also known as “the second generation”) in several ways. These include introducing some form of *jus soli* or rights to opt into citizenship at maturity, a reduction of naturalization requirements for first-generation immigrants, and an increasing acceptance of dual citizenship. With regard to citizenship acquisition by *jus soli* or simple declaration of the second generation, the result of dual citizenship is usually accepted. An exception is Germany, which requires *jus soli* citizens to opt for one of their citizenships at maturity.

Among the EU-15, only six still require renunciation of previous citizenship. Spain, however, does not require proof of the actual loss of previous citizenship although the law mandates it. In the Netherlands, Germany, Austria, Denmark, and Luxembourg, the renunciation requirement has a number of exceptions. For instance, all these countries allow dual citizenship when renunciations are legally impossible or extremely difficult, and individuals with recognized refugee status may also have dual citizenship. In the Netherlands, Germany, and Denmark, these and other exceptions result in dual citizenships in 40 to 50 percent of all naturalization cases.

However, the ten states that joined the European Union in 2004 are less tolerant towards dual citizenship in cases of naturalization. Only three states — Cyprus, Hungary, and Malta — explicitly accept dual citizenship of immigrants. Remarkably, six of the remaining states are countries that only recently became independent: the Baltic states (Estonia, Latvia, and Lithuania), the Czech Republic, Slovakia, and Slovenia.

In European countries that do not belong to the European Union, the situation also varies. For example, Switzerland has tolerated dual citizenship of immigrants since the early 1990s. Norway requires individuals to renounce their previous citizenship before they can become Norwegian citizens.

The growing tolerance towards dual citizenship has also strengthened the rights of expatriates. In the past, they were mostly excluded from political participation in their countries of origin. Currently, extraterritorial voting rights for citizens living abroad are widespread. In some cases, external voting may even have an impact on national elections, as it did in Italy in 2006.

Emigration countries are also confronted with the problem of whether, and under what conditions, their citizens living abroad can retain or lose their citizenship.

Among European countries, policies have moved toward accepting dual citizenship. In 1973, French citizens were no longer required to give up their citizenship if they became naturalized in another state. Portugal implemented a similar law in 1981, Italy in 1992, Sweden in 2001, and Finland in 2003. In some European states, such as Italy, Sweden, and Finland, the desire of emigrants to retain their nationality played an important role in the decisions of the respective governments to accept the dual citizenship of immigrants.

Countries outside Europe have also eased restrictions on emigrants who become naturalized. Many allow emigrants to retain their citizenship, make it easier for them to regain their

citizenship or have mitigated the consequences of losing citizenship. These include emigration countries such as Turkey, India, Tunisia, Mexico, El Salvador, Colombia, and the Dominican Republic. Some of these countries do not allow their emigrants full dual citizenship. Instead they offer a sort of “light citizenship.” For example, in the early 1980s, the Turkish government passed a law that guaranteed Turkish-born emigrants (who have acquired the citizenship of the state in which they reside) the same rights as Turkish citizens on a number of issues such as pensions and property. Since the mid-1990s Turkish citizens who naturalize in Germany can hold a “pink card,” which granted card holders rights equal to those held by full Turkish citizens, except the right to vote in Turkish elections.

These changing policies and attitudes toward dual citizenship originated in international law. The European Convention on the Reduction of Cases of Dual Nationality and Military Obligations in Cases of Dual Nationality of 1963 still clearly aimed at limiting the instances of dual citizenship. However, the 1997 European Convention on Nationality, which the overwhelming majority of European states have signed, contains no provision referring to dual citizenship as an abnormality that needs to be eliminated. Instead, the 1997 Convention expands the discretion of the contracting states to tolerate dual citizenship. It also provides for explicit acceptance when children acquire dual citizenship by birth and when renunciation or loss is not possible or cannot reasonably be required. The European Convention on Nationality, together with other developments in international law, illustrate an increasing trend toward recognizing citizenship as a human right, including the right to citizenship of the state in which individuals permanently reside.

Although it is likely that the number of dual citizens has risen consistently over the past decades, it is difficult to provide reliable estimates. States usually register only their own citizens and do not count the number of citizenships acquired. Moreover, people with two or more citizenships may keep quiet to avoid administrative difficulties. Germany is one of the few countries which count dual citizens in cases of naturalization. According to the newsletter *Migration und Bevölkerung* (2006), about 45 percent of all naturalizations between 2000 and 2006 involved new citizens who were allowed to keep their original citizenship. If one is interested in the total number of dual citizens residing in German territory, then dual citizenships arising from other instances, such as children of binational couples, have to be added. How difficult it is to assess the total number of dual citizens can also be seen in related efforts in the United States, where, for example, estimates range from 500,000 to 5.7 million US dual citizens (Renshon 2001).

In sum, the two most important factors explaining the increasing tolerance toward dual citizenship are: first, the changing relationships between individual nation-states, and second, altered relations between states and citizens. Dual citizenship can be seen as a result of nation-state politics. While previous bilateral and multilateral forms of international cooperation aimed to avoid instances of dual and multiple citizenships, more and more nation-states have opted out of this interpretation. Interstate cooperation concerning nationality acquisition was regarded as necessary in the 19th century for enforcing the principle of one citizenship against competing military conscription claims of other states. This necessity no longer exists. Many European states have abolished mandatory military service. For those states that still have conscription, the dominant principle is that dual citizens are obliged to perform military service in the state of residence and are exempt from military service in the state of their other citizenship. Consequently, pressures on nation-

states to cooperate in avoiding dual citizenship have decreased significantly while the leeway to pursue national interests through national citizenship laws has expanded. In parallel, enhanced economic and political cooperation between democratic nation-states, the creation of the European Union, the end of the Cold War, and, especially, the decreasing probability of interstate wars between democracies has meant that nation-states are becoming less and less concerned about their citizens' loyalty.

The growing importance of human rights norms has also helped the rise of dual citizenship. These norms have limited state discretion. Liberal democratic states, even when adhering to the principle of avoiding dual citizenship as far as possible, are compelled to grant at least certain exemptions. This tendency is linked to principles of legitimacy in democratic political systems. For instance, liberal democracies accept dual citizenship upon naturalization if the other state makes renouncing citizenship impossible or imposes unreasonable demands. Liberal democratic states also tend to accept dual citizenship in the name of gender equality when citizenship is acquired by birth. Furthermore, such states may be inclined to grant dual citizenship on the basis of reciprocity within regional governance systems, such as the European Union.

So far, policymakers have responded explicitly by passing new citizenship laws but also by abstaining from regulation and thus implicit toleration. Yet integration in the European Union, based on the common principles of integration, demands more explicit coordination.

## **The Benefits of Dual Citizenship**

Given the trend toward dual citizenship and the need for a common EU integration policy, liberal democracies are faced with deleterious consequences if they host large numbers of immigrants without granting them access to full rights and responsibilities. The dominant trend of conceiving citizenship acquisition as a means of immigrant integration has led to the liberalization and de-ethnicization of citizenship laws. Consequently, naturalization has become easier, and more countries tolerate dual citizenship. Accordingly, citizenship laws from the 1980s to 2005 in the EU-15 became more liberal.

Taking three significant indicators — birthright citizenship (*jus soli*) for the children of immigrants, the length of residence required for naturalization, and the tolerance of dual citizenship — it turns out that Germany, Luxembourg, Finland, Sweden, and the Netherlands have significantly liberalized naturalization requirements. The rules for citizenship acquisition in these five countries converged with those of the remaining ten longstanding EU Member States. The growing liberalization in general and the toleration of dual citizenship in particular has yielded a number of specific benefits.

### **Dual Citizenship as a Means to Increase Naturalization Rates**

Not all immigrants who are eligible to acquire citizenship actually submit an application. Although the reasons why immigrants become naturalized depend on a number of factors, there are strong indications that the requirement to renounce their previous citizenship is one of the most important obstacles. For instance, whereas the naturalization rates of Turkish immigrants in the Netherlands rose sharply between 1992 and 1997 (the period when dual citizenship was tolerated without exceptions), an equivalent group of Turkish



immigrants in neighboring Germany (which, as a general rule, did not accept dual citizenship) had much lower naturalization rates. Similar results can be observed in North America. Immigrants in Canada are more inclined to become naturalized than are those in the United States. One of the reasons is simple: the United States still demands a renunciation of prior citizenship during the naturalization procedure. Though immigrants tend to know that the United States will not take action against those holding another citizenship, the renunciation requirement implies that the country will not tolerate dual citizenship. This approach contrasts with Canada, where dual citizenship is valorized in official government statements. The Canadian situation can be seen as an expression of the “ethnic paradox.” The ethnicity paradox holds that attachment to ethnic origins actually helps group members to become incorporated into the host polity.

In Europe, data compiled by the Organization for Economic Cooperation and Development (OECD) in 2007 showed that easing the retention of original citizenship — with all other factors held equal, such as residence requirements and restrictive or liberal administrative practices — led to increased naturalization rates between 1996 and 2005. Those countries that did not tolerate the retention of original citizenship had lower naturalization rates. For example, the rates in Germany, Spain, Luxembourg, and the Czech Republic were lower than in Sweden, Switzerland, or the United Kingdom. Since 2000, average acquisition rates have ranged from 2.1 percent in Germany to 7.6 percent in Sweden, with the other four states taking the middle ground of approximately 4 to 5.5 percent. Some countries which accept dual citizenship, such as Portugal and Italy, have rather low rates of immigrant naturalization. In these cases, however, permanent residents must wait for long periods before they can become naturalized.

Political participation is highly valued among many dual citizens, especially in countries such as Portugal, Germany, and the United Kingdom. However, in the United Kingdom, many noncitizens reported they were not dissatisfied that they could not vote, but, at the same time, they felt a lack of representation (Pitkänen and Kalekin-Fishman 2007). This refers to an important aspect of the congruence between the rulers and the ruled that is independent of actual political participation. Although noncitizen immigrants usually have wide opportunities for political participation, such as forming political associations, they are not represented in a very important sense. If they lack the right to vote, it is likely that political representatives and those running for political office will not take the concerns of these noncitizen immigrants seriously because they cannot expect votes from them.

### **Dual Citizenship Advances Overall Participation**

Although it depends on the legal framework of the host country in which an immigrant is residing, holding citizenship of that country, in many cases, avoids the need for a work permit, entails full protection against expulsion, enables access to public employment, decreases administrative difficulties, and, in the EU context, allows for mobility within the European Union without a visa. Such advantages tied to citizenship will clearly enhance the probability of socioeconomic integration.

## **Dual Citizenship Enhances Transnational Participation beyond the European Union**

In particular, the freedom to travel across borders, greater opportunities in the labor market, and access to educational institutions are advantages often mentioned by immigrants in Estonia, Finland, France, Germany, and Portugal (Pitkänen and Kalekin-Fishman 2007). Concerning their country of origin, immigrants may enjoy privileged access to the territory and the economic sector, for example by retaining inheritance and property rights. Without dual citizenship — and statuses similar to it, such as Turkey’s pink card — such privileges may be otherwise lost.

In the destination country, the acceptance of dual citizenship recognizes the specific symbolic and emotional ties that immigrants have; it also gives them an opportunity to choose their own integration course. Interestingly, transnational participation may also be beneficial for national integration. This corresponds to the empirically substantiated finding that not all immigrants experience a uniform path of integration (Faist 2000).

In Europe, some immigrants assimilate culturally and gradually lose their ties to regions of origin; others maintain ties to regions of origin and destination over several generations.

A third category of immigrants includes those who engage globally in this era of increased mobility of people, information, money, and consumer goods. Especially in countries with a high proportion of immigrants, networks, groups, and organizations have emerged that connect people in many different places. These “transnational social spaces,” understood as combinations of social and symbolic ties, and networks of organizations that reach across the borders of multiple states, allow for and often facilitate certain types of incorporation. For example, the immigrant entrepreneur who needs to mobilize contacts across borders could benefit by retaining the citizenship of his home country.

## **Dual Citizenship Enhances Esteem and Self-Respect**

Many migrants commonly have attachments and involvements in two or more places across nation-state borders; consequently, they have plural identifications and loyalties. When dual citizens regard their citizenships as essential to their identity, deciding which citizenship they would keep if they had to give one up could cause emotional difficulties. These dual citizens regard the state’s acceptance of dual citizenship as a kind of official legitimization of their multicultural identity. In this sense, dual citizenship can be regarded as symbolically acknowledging transnational living circumstances, such as growing up within different cultural and ethnic backgrounds, nations, and religions; in this respect dual citizenship can promote the integration process.

In particular, children can be integrated more easily if the respective state accepts or even welcomes dual citizenship. This is mainly because the state is likely to encourage such children to develop specific competencies related to a transnational background, such as bilingualism and intercultural mediation. In Germany, for example, children of binational marriages, who are dual citizens from birth, regard their dual citizenship as important for their integration (Schröter and Jäger 2007).

Within local contexts of participation and intercultural contacts, dual citizenship may also help natives recognize immigrants as full and equal members of society. Although discrimination takes many forms, the distinction between aliens and citizens also plays a certain role in situations of disrespect. Citizenship status may help immigrants to see themselves as competent members of society and worthy of respect from others.

These considerations are relevant for further developing more recent notions of “civic citizenship,” as the European Commission and European Parliament emphasized (Commission of the European Communities 2003). Civic citizenship aims to enhance mutual tolerance, solidarity, and trust between migrants and citizens. Since civic citizenship does not mandate that all those included are full citizens, dual citizens, with their bicultural competences, may play a particularly important role as mediators between citizens and newcomers. (For a summary, see Table 1.)

**Table 1. The Contribution of Dual Citizenship to Immigrant Integration**

<b>Dimensions of citizenship rights</b>	<b>Citizenship acquisition of the immigration state</b>	<b>Retaining original citizenship</b>
Belonging and membership	Full legal membership, which may contribute to acceptance of immigrants on the part of the indigenous population and may help immigrants identify with the state of residence	Recognition of transnational ties and related multicultural skills
Pragmatic benefits	Avoidance of visa requirements, and easier access to education and (public) employment in the state of residence as well as in EU countries	Preservation of rights connected to citizenship (e.g., privileged access to territory, inheritance and property rights, entitlement to trade registering), which may be beneficial for strategies of economic subsistence

## **Problems Dual Citizenship Poses**

Despite the benefits of dual citizenship, some countries resist the increasing tolerance towards it because of fears about the consequences of dual voting, of a lack of integration and loyalty, and of a devaluation of citizenship. These worries need to be taken seriously.

### **Dual Voting**

A question that often comes up in public debates is the problem of dual voting rights. In Sweden, the potential violation of the principle of “one person, one vote” was what opponents of liberalizing citizenship laws regarded as the most important problem. However, the benefit of having more people participating in the state where they reside was later seen as outweighing the problem of double voting.

Moreover, the problem is overestimated: even if voting rights are exercised in two or more countries, the votes are usually aggregated in different elections and polities and therefore do not count twice. This is important because many European states allow emigrants, under certain conditions, to vote at the national level. For example, among the EU-15 Member States, only Greece and Ireland do not grant voting rights to citizens residing abroad. Since equal-treatment clauses usually prohibit different treatment of emigrants with single citizenship and those with dual citizenship, dual citizens residing abroad usually have voting rights. If links between the respective citizens and states continue to exist, it seems obvious as well as legitimate that these ties should be governed by democratic procedures. However, if a citizen of both Germany and France were allowed to vote in each country for the European Parliament, this would mean her vote would be counted twice. This would clearly violate the principle of “one person, one vote.”

In answer to the objection that dual citizens are privileged because they can pursue their interests by casting ballots in two separate polities, one can argue that people with more money and other resources exert a larger influence in elections than others do. This is different in federal political systems, such as the United States or Germany, or proto-federal systems, such as the European Union.

### **Lack of Integration**

Two broader issues support the view that integration should be proved and tested. The first refers to alleged patterns of failed integration, with reference to immigrants' high unemployment rates together with their lower educational levels and their higher-than-average dependence on welfare.

The second issue concerns a growing fear of Islamic fundamentalism and terrorism, which has led to an increased political and public observance of illiberal traditional and religious practices in some European countries; these practices include forced and arranged marriages and honor killings. Worries about immigrants from Muslim countries increased in the aftermath of September 11 and the bombings in Madrid and London, among other events.

However, while empirical evidence suggests dual citizenship may increase political participation and socioeconomic opportunities, there is no plausible argument, and indeed no proof, that dual citizenship contributes to spirals of nonintegration, exclusion, and segregation.

## **Lack of Loyalty**

Citizenship implies that an individual identifies with common political values, a sense of responsibility toward the common good and a sense of solidarity with fellow citizens in a particular nation-state. For governments, the most pressing problem regarding loyalty concerns those permanent residents who are not willing to renounce their citizenship of origin. There may be people who have been permanent residents of a country for many years without ever wanting to acquire the citizenship of that country.

Immigrants who maintain social and symbolic ties to their home countries, as expressed in their wish to retain their original citizenship, are often seen by the dominant groups in immigration societies as lacking substantive identification with their country of settlement. After all, many of them probably will not return to the country of origin or engage in onward migration. It is hard to believe integration as well as their loyalty to the state of residence will be enhanced under such conditions. Consequently, it has been suggested by proponents of dual citizenship that those states with low naturalization rates could take a more pragmatic view of dual citizenship.

## **The Devaluation of National Citizenship**

Dual citizenship is connected to the fear that national citizenship will lose its value. There is also no consensus on whether citizenship acquisition is a prerequisite for integration or the crowning of a process. Current policy innovations and changes suggest that the latter perspective is gaining prominence as states have begun to introduce naturalization and other tests and requirements. All of these are in response to the fear of nonintegration and even perceived integration failures attributed to immigrants' behavior. Many European states, including those that have long viewed citizenship as a means of integration, such as the Netherlands, have introduced stricter language and integration requirements as a precondition for acquiring residence permits and citizenship. Migrants who fail to meet these requirements could face sanctions. A growing number of European states have established citizenship tests — a longstanding practice in the United States and Canada — with corresponding formal exams to test language skills and knowledge of society. These states include Denmark in 2002, France and the Netherlands in 2003, Greece in 2004, the United Kingdom in 2005, and, most recently, Austria and some German federal states (Länder) in 2006.

The idea underlying “naturalization as the crowning of a completed integration process” is that citizenship laws should specify reliable criteria for comprehensive and successful socioeconomic and civic integration. This means that immigrants need to fulfill these criteria before acquiring citizenship and the full spectrum of individual rights connected with it. Making acquisition dependent on individual performance extends beyond immigration and naturalization policies. For example, certain welfare rights are increasingly based on citizens first agreeing to conform to state-defined appropriate behavior. These measures, as well as increased attention to criteria such as income and other economic qualifications, must be seen as a defense of national citizenship.

This shift, which, at first glance, is only a sign of a more restrictive approach toward citizenship, comes partly from EU Member States' fear that expanding European citizenship devalues national citizenship. Countries have relaxed the requirements for acquiring

citizenship, embraced dual citizenship, and made territorial birthright citizenship the norm — developments that all seem irreversible.

At the root is a perceived trade-off between national citizenship (embodying territorial assumptions of full membership) and European citizenship (consisting mostly of individual rights of personhood, such as human rights or rights of residence). This tension is hard to resolve.

At stake is a new balance between legal citizenship — often called “nationality” — and political citizenship. Political citizenship consists of three mutually interacting dimensions: equal political liberty, reciprocal rights and obligations between states and citizens, and collective affiliation to a political community. Rights and obligations have been partially decoupled from legal nationality, and collective affiliation can refer to several nations in the case of dual citizenship or even supranations, as in European Union citizenship. Yet the common root of citizenship is still the same, whether we talk of national, dual, or European Union citizenship: namely, equal political freedom. Thus, it is important to remember that the political concept of citizenship does not only consist of rights and obligations and affiliation to national identity, but also includes the idea that people subject to laws are also their authors.

## **Future Implications of Dual Citizenship**

The inevitability of dual or plural citizenship suggests that states should welcome dual citizenship. Arguments against it are weak. First, the fear of dual voting is misplaced because — if at all — migrants vote in different nation-states. Second, the spread of dual citizenship obviously has not led to a noticeable increase in interstate tensions and conflicts. The problems of conflicting laws, rights, and duties regarding taxation, family rights, military service, and inheritance can be solved by referring to the state of habitual residence and/or through bilateral or multilateral treaties. Third, even if one has doubts about the loyalty of dual citizens, it is better to have them as citizens than noncitizens.

The evidence suggests that policymakers should not only tolerate dual citizenship but also support it. First, dual citizenship leads to higher rates of naturalization and thus encourages overall social and political integration. Second, dual citizenship enhances democratic legitimacy because it embraces both the resident immigrant population and the rest of the general population. Third, on balance, and with the definitional caveats such a statement will inevitably provoke, dual citizenship promotes integration — regardless of whether the citizenship regime seeks to integrate immigrants or to crown the process of integration. But for policymakers grappling with this issue, there is an equally sound reason: it is pragmatic, efficient, and more cost-effective to recognize dual citizenship, and to otherwise allocate resources towards improving other aspects of the integration process. Fourth, dual citizenship transcends exclusive either-or notions and rules of membership in political communities. The increasing toleration of dual citizenship in Europe and around the globe reflects life across borders and multiple belonging.

In effect, the spread of dual citizenship helps to further overcome dichotomies between concepts of immigrant incorporation. Migrants generally do not cut ties to their countries of origin right away. This observation needs to be complemented: since one of the major

functions of dual citizenship is to prepare immigrants for incorporation into the country of settlement, dual citizenship could be temporary because the salience of the original citizenship might, in some cases, decline over the course of time. In a mobile world, dual citizenship will nonetheless continue to grow as new immigrants and their children strive to become full members of liberal democratic communities.

## **Policy Recommendations**

1. Accept dual citizenship as a rule. In order to participate in public life and politics, education, and employment, as laid down by the common EU principles of integration, citizenship of both the host and origin countries usually benefits migrants. It allows them to integrate into the country of immigration and to maintain their rights in the country of origin. The fear of citizenship being devalued is largely misplaced since, for most immigrants, instrumental and symbolic factors are interwoven.
2. Strengthen harmonization trends in the European Union. EU Member States should tolerate dual citizenship so that immigrants in all Member States are not subjected to severe or unequal treatment regarding the conditions of naturalization. Because most EU Member States tolerate dual citizenship, they have already set the stage for harmonization. In this way, dual citizenship can serve as a link between national citizenship and EU citizenship.
3. Make dual citizenship part of citizenship education. Because of renewed discussions about the importance of national citizenship and a concern among Member States that citizenship might become devalued, the EU concept of civic citizenship needs to be part of citizenship education in schools and other institutions of learning. Civic citizenship implies participation in public life. It embraces national, local, and supranational forms of citizenship, and thus goes to the root of citizenship, namely democracy.
4. Widen the scope of citizenship ceremonies. In an age of mobility and the growing importance of international norms, dual citizenship can more effectively advance civil and political engagement than simply extending rights to noncitizens. Therefore, policymakers should embrace dual citizenship and institute citizenship ceremonies that reflect the importance of belonging and integration.
5. Make dual citizens part of development and peace cooperation. Immigrants who are well-integrated into the country of immigration can mediate across borders. Under certain circumstances, dual citizens can take part in development cooperation and conflict mediation. The children of immigrants are especially well-positioned to act as conflict mediators since they are less likely to be actively involved in the conflicts.

## **Appendix A: Research on Dual Citizenship**

Dual citizenship has entered the research agenda of the social and political sciences only very recently. So far, most studies have been concerned with the perspective of nation-states, pertaining to policies of immigrant integration and citizenship law in general (e.g., Bauböck et al. 2006) and the development of international law (e.g., Chan 1991; Spiro 1997; Koslowski 2003). Related empirical research has focused either on single countries (e.g., Renshon 2001) or on comparisons of more or less different states (e.g., Aleinikoff and Klusmeyer 2001 and 2002; Martin and Hailbronner 2003; Hansen and Weil 2001; Howard 2005; Faist 2007; Kalekin-Fishman and Pitkänen 2007). Only a few empirical studies explore dual citizenship from the migrant's perspective, that is, their incentives for acquiring dual citizenship and their motives for keeping it, and their use of opportunities connected to "dual" citizenship rights in US and Canadian contexts (e.g., Bloemraad 2007), as well as in selected European countries (Pitkänen and Kalekin-Fishman 2007). Even fewer studies draw attention to the nexus between citizenship, cross-border engagement of immigrants (Faist and Özveren 2004) and the implications these have for integration (Faist 2000), or to the implications of dual citizenship for overall citizenship and societal integration (Kivisto and Faist 2007; Spiro 2007).



## Appendix B: Country Laws

### Europe

Tolerant	Restrictive
Bulgaria	Andorra (3)
Federal Republic of Yugoslavia	Austria (4)
Sweden	Belgium (4)
Cyprus	Croatia
France	Czech Republic (3)
Greece	Denmark (3,4)
Switzerland	(Finland (2,3,4)
Serbia and Montenegro	Germany
Hungary	Iceland
Ireland	Netherlands (3,4)
Italy	Norway (3,4)
Latvia	Poland (3)
Portugal	Romania
Lithuania	Ukraine
Macedonia	
Malta	
Spain (only in certain cases)	
Turkey	
United Kingdom	

### Americas

Tolerant	Restrictive
Antigua and Barbuda	Argentina (except Spanish Citizens) (4)
Barbados	Bahamas
Belize	Bolivia
Brazil (3)	Chile (2,3,4)
Canada	Cuba (3)
Chile (only in certain cases)	Dominican Republic (2,3,4)
Colombia (3)	Ecuador (except for Spanish citizens) (3,4)
Costa Rica	Venezuela (2,3,4)
El Salvador	
Mexico	
Peru	
United States of America	

**Africa**

<b>Tolerant</b>	<b>Restrictive</b>
Benin	Algeria (4)
Burkina Faso	Angolia (2,4)
Cape Verde	Botswana (2,3,4)
Central African Republic	Burundi (3,4)
Egypt	Cameroon (3,4)
Nigeria	Congo (3,4)
Mauritius	Djibouti (3,4)
South Africa	Ghana
	Kenya (2,3,4)
	Namibia (2, 3, 4)
	Tanzania (2, 3, 4)
	Zimbabwe

**Asia and Oceania**

<b>Tolerant</b>	<b>Restrictive</b>
Australia	Afghanistan (1,3,4)
Bangladesh (only in certain cases)	Armenia (3,4)
Cambodia	Azerbaijan
Israel	Bahrain
Jordan	Belarus
Lebanon	Bhutan
New Zealand	Brunei (2,3,4)
Pakistan	Burma
Russia	China (3)
Syria	Fiji (2,3,4)
Tonga (only in certain cases)	India (3,4)
Western Samoa	Indonesia (3,4)
	Iran (1)
	Japan (2, 3, 4)
	Kiribati (3)
	Korea North (1)
	Malaysia (3, 4)
	Nepal (3, 4)
	Papua New Guinea (2, 3, 4)
	Philippines (2, 3, 4)
	Singapore (2, 3, 4)
	Solomon Islands (2, 3, 4)
	Thailand (2, 3, 4)
	Vietnam (1, 3)

*Source:* United States Office of Personnel Management, Investigations Service, “Citizenship Laws of the World”, <http://opm.gov/extra/investigate/IS-01.pdf>.

*Note:* The most restrictive cases are characterized by the following criteria:

1. Assignment by birth: only one citizenship possible.
  2. Obligation to choose one citizenship on reaching maturity.
  3. Renunciation requirement (in some cases proof also required) upon naturalization in another country.
  4. Forced expatriation upon naturalization in another country.
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The more strictly the acquisition of a citizenship is governed by principles (1) to (4), the more restrictive the regime. Conversely, the more lenient the procedure, or the more exemptions from these requirements allowed, the more tolerant the regime.

## About the Authors

### Thomas Faist

Thomas Faist is Professor of Transnational Relations and Sociology of Development at the Department of Sociology, Bielefeld University. He received his PhD from The Graduate Faculty, New School for Social Research. His research focuses on migration, citizenship, and social and development policies. Dr. Faist was Willy-Brandt Guest Professor at the University of Malmö and DAAD Visiting Professor at the University of Toronto. He is the deputy editor of *The Sociological Quarterly*.

### Jürgen Gerdes

Jürgen Gerdes is a political scientist and a researcher associated with the Center on Migration, Citizenship, and Development (COMCAD) at Bielefeld University in Germany. He is currently working in a research project on "Transnationalization, Migration, and Transformation: Multi-Level Analysis of Migrant Transnationalism" (TRANS-NET, 7th Framework Programme of the EU).

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