

## **Acceptance of Dual Citizenship: Empirical Data and Political Contexts**



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Working Paper Series „Glocal Governance and Democracy” 02  
Institute of Political Science  
University of Lucerne  
February 2009

ISSN 1662-923X

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With its working paper series “Glocal governance and democracy” the Institute of Political Science at the University of Lucerne provides the opportunity to present conceptual ideas, normative debates and empirical findings regarding current political transformations of the modern state system. The term “glocalization” addresses key transformations in respect to levels of governance and democracy – multiplication and hybridization. These features can also be observed in the processes of horizontal interpenetration and structural overlaps among territorial units (transnationalization), in new forms of steering with actors from the private, the public and the non-profit sector (governance), in the interferences among functional regimes and discourses and in emerging new communities and networks between metropolitan centres and peripheries on various scales. One of our core themes is migration and its consequences for development, transnational integration and democracy. A second field of research and discussion is governance and democracy in functionally differentiated and multi-level systems.

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## Abstract/Summary

In this paper we present empirical data on the historical development, the current regulations and the political contexts of dual citizenship regulations in the world. With this focus on empirical data this report presents complementary information in respect to the first results of our research project. In the paper “Dual citizenship and democracy” Joachim Blatter (2008) discussed the normative implications of dual citizenship on the basis of six theories of democracy.

The first part contains an overview on existing surveys on dual citizenship. These surveys indicate that the acceptance of dual citizenship by countries has been rising strongly since Second World War. At the beginning of the 21st Century, from 189 analyzed countries, 87 show a rather positive stance toward dual citizenship and 77 a rather negative one. For 25 countries, the existing surveys do not provide consistent results.

In the second part of the paper, we present the findings of our own expert survey in which we collected more differentiated information about the contexts, salience, goals and specifics of dual citizenship regulation for 35 countries. Our data reveals the high political salience of citizenship regulations in many countries and the fact that the acceptance of dual citizenship is often a very controversial aspect of citizenship reforms. In line with the data in the first part of the paper, our data shows a steady trend towards broader acceptance of dual citizenship. Furthermore, we discover a trend towards more symmetric regulations of dual citizenship insofar that emigrants and immigrants are treated similar. Although this is mainly due to the fact that dual citizenship is facilitated for emigrants we do not interpret this as a re-ethnicization of citizenship but as a trend towards an expansive and non-exclusive notion of citizenship. Contrary to many normative theorists, most countries do not apply any restrictions for dual citizens in respect to political participation and in respect to taking political offices. Finally, our data does not confirm any “securitization” discourses. Both, the traditional/conservative fear that dual citizens might produce military or diplomatic conflicts between states and the liberal/critical warning that dual citizenship might be used for expelling and denationalizing migrants, which are perceived as threats to the host society, have proven unwarranted (so far).

### Acknowledgments:

Research for this paper has been made possible by a grant of the Nederlandse Organisatie voor Wetenschappelijk Onderzoek (NWO) within the program „Omstreden Democratie.“ We are grateful for this support and the stimulating working environment at the Department of Public Administration, Erasmus University Rotterdam, where a large part of the work for this paper has taken place. Furthermore, we would like to thank Michael Buess for support in formatting and lay-out.

## Introduction

Dual citizenship has not only become a salient political issue in many countries (e.g. The Netherlands, Germany, Hungary, South Korea) – although in quite a few countries the rising number of dual citizens is not accompanied by a significant political discourse (e.g. in the US, Canada and Great Britain) – it is also a booming field in legal studies and the social sciences.<sup>1</sup> Nevertheless, broad-based empirical data beyond individual case studies is still very scarce. In the first part of this paper we provide a brief overview of the results of those studies which analyzed the regulations of dual citizenship in more than a few countries. We have found only one study which reveals the rising numbers of countries with legislation allowing dual citizenship over time (Brondsted Sejersen 2008) and nine studies which look at the dual citizenship regulations at the beginning of the 21<sup>st</sup> Century. These studies reveal a clear global trend: the acceptance of dual citizenship has strongly risen in the last twenty to thirty years and at the beginning of the 21<sup>st</sup> Century already a majority of the countries, for which data exists, accepts or at least tolerates dual citizenship. This represents a dramatic turn-around since from the mid-19<sup>th</sup> century to the mid-20<sup>th</sup> century dual citizenship was conceived as an evil which had to be prevented.

In the first part of this paper we present and comment on existing data. Although this data reveals a clear and broad-based trend towards the acceptance of dual citizenship, it shows also that many ambiguities and gaps exist. Therefore, we conducted our own expert survey in order to get a more differentiated view on the existing regulations and even more so in order to get a better understanding of the political contexts of the changes in dual citizenship regulations. The results of our own expert survey are presented in the second part of the paper.

## 1. Existing data on dual citizenship

### 1.1 The rising acceptance of dual citizenship after World War II

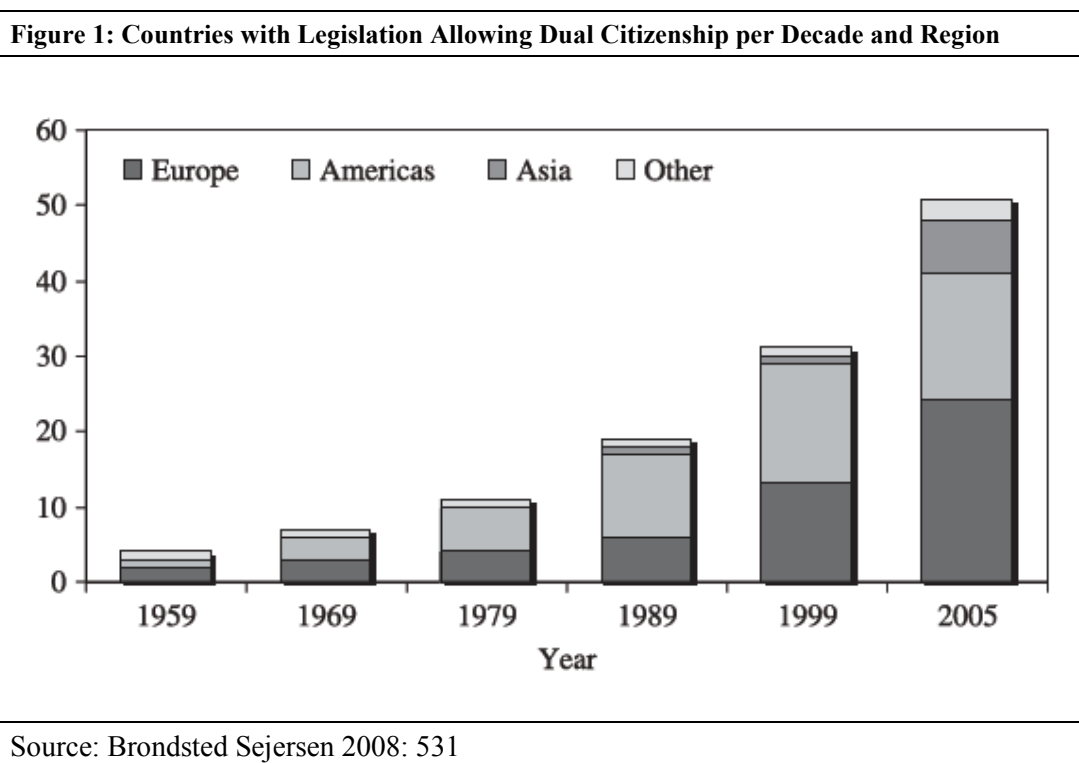
The only quantitative study that contains information on the historical development of dual citizenship legislation is the survey conducted by Tanja Brondsted Sejersen (2008). She collected information for 115 countries by analyzing official state Web sites and journal and newspaper articles (Brondsted Sejersen 2008: 530). Brondsted Sejersen points to the fact that her data represents the official written laws on dual citizenship and does not reflect the enforcement of these laws. Since in many countries there is a gap between the *de jure* and the *de facto* situation – quite a few countries maintain legislation against dual citizenship but do not enforce this legislation, an aspect which we investigate in depth in section 3 of this paper – her data represent a rather conservative estimate of the phenome-

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<sup>1</sup> Major legal studies dealing with dual citizenship include: Alainikoff and Klusmeyer 2001, 2002; Hansen and Weil 2002; Martin and Hailbronner 2003; Neuman 1994; Spiro 1997, 2006. Some of the most important contributions by social scientist are the following: Bauböck 1994; Betts 2002; Bloemraad 2004; Cain and Doherty 2006; Escobar 2004, 2006; Faist 2007; Faist and Kivisto 2007; Kivisto and Faist 2007; Kalekin-Fishman and Pitkänen 2007; Kleger 1997; Itzigsohn 2007; Jones-Correra 1998, Schröter, Mengelkamp and Jäger 2005; Mazzolori 2005.

non of dual citizenship. Furthermore, she did not include those countries in figure 1 for which she did not obtain any information about the year of legislation (Bronsted Sejersen 2008: 531).

Figure 1, which presents her data according to the time and the region in which legislation allowing dual citizenship occurred, reveals two interesting insights: First, the rise of countries with legislation allowing dual citizenship is exponential and exhibits the strongest growth in the last 15 years. Second, the official acceptance of dual citizenship started to rise in the 1970s and 1980s in the Americas led by the countries with emigrants to the United States. This trend took off in Europe only in the 1990s and in Asia in the last few years.



### 1.2 Surveys on the acceptance of dual citizenship at the beginning of the 21<sup>st</sup> Century

We found nine studies with quantitative information on the spread of dual citizenship at the beginning of the 21<sup>st</sup> Century (full bibliographic information is given in table A in the appendix to this chapter). These studies are very diverse in respect to the definitions, the number of countries included and the quality of information gathered.

There are four studies with a large number of countries and a global perspective (US Office of Personnel Management 2001, Renshon 2005, Boll 2007, Bronsted Sejersen 2008), two studies looking at the 15 older member states of the European Union (Chopin 2006, Howard 2005) and two studies focusing the Latin American and Caribbean counties (Jones-Correra 2001, Staton et al. 2007). Another one (Weil 2001) included the main Western countries plus a few East European countries.

As it will get more and more obvious throughout this study, dual citizenship and its regulation is a complex phenomenon. This is because there are many ways to become a dual citizen, because some states do not treat immigrants equal to their emigrants and because there is sometimes a gap between the general stance towards (against) dual citizenship and the administrative practice. Furthermore, we have to differentiate between regulations which refer to the acquisition of dual citizenship and the recognition of the rights, privileges, or immunities of citizens which are connected to another citizenship by a state during the stay on the territory of this state and/or the recognition of a duty of diplomatic protection of dual citizens on the territory of the other state. In consequence, it is quite important to look at the definitions which authors apply for coding the (non-)acceptance of dual citizenship by states.

First, only one study seems to focus on the recognition of “rights, privileges, or immunities” of dual citizenships by governments (the US Office of Personnel Management 2001: 6), whereas all other studies concentrate on the rules that regulate the acquisition of dual citizenship.

Second, some studies take all options for becoming a dual citizen into account (by birth, by marriage, by adoption and by naturalization). In consequence, this leads to a quite extensive list of countries which allow dual citizenship “in some form” (Renshon 2005). Whereas the detailed study of Boll (2007) also provides information on all these options, we transformed his information into our overview by mainly taking into account the rules which are applied for naturalization (by emigrants and immigrants). These rules reflect best the political attitude within a country towards dual citizens and lead to a more restricted list of countries which accept dual citizenship.

Third, especially the studies which are concerned with the impact of dual citizenship in the United States focus on the rules which migrant sending countries adopt in respect to dual citizenship for emigrants (Jones-Correra 2001, Renshon 2005, Staton et al. 2007). Since countries are becoming more lenient for granting dual citizenship for their emigrants, this lead to an extensive list of countries accepting dual citizenship. Unfortunately, these studies do not provide any information whether these countries apply the rules for dual citizenship symmetrically to their immigrants. In contrast, Howard (2005) focuses explicitly on the regulations for immigrants. Whereas Boll (2007) provides information in respect to the regulations for both (and we took both aspects into account in our coding of his results), other studies are not very clear in this respect.

Forth, sometimes there exists a gap between the general stance towards dual citizenship (usually negative) and the administrative practice. Despite a general legal principle to avoid dual citizenship many countries either apply a long list of exceptions or do not enforce the requirement of renunciation if somebody takes up a new citizenship. Not all studies take these exceptions and the implementation gaps into account or they do so without making transparent how these exceptions and implementation gaps are taken into account in the overall classification. Only Boll (2007) and Chopin (2006) provide detailed information on the exceptions and the implementation of the regulations; the US Office of Personnel Management (2001) does so for some countries.

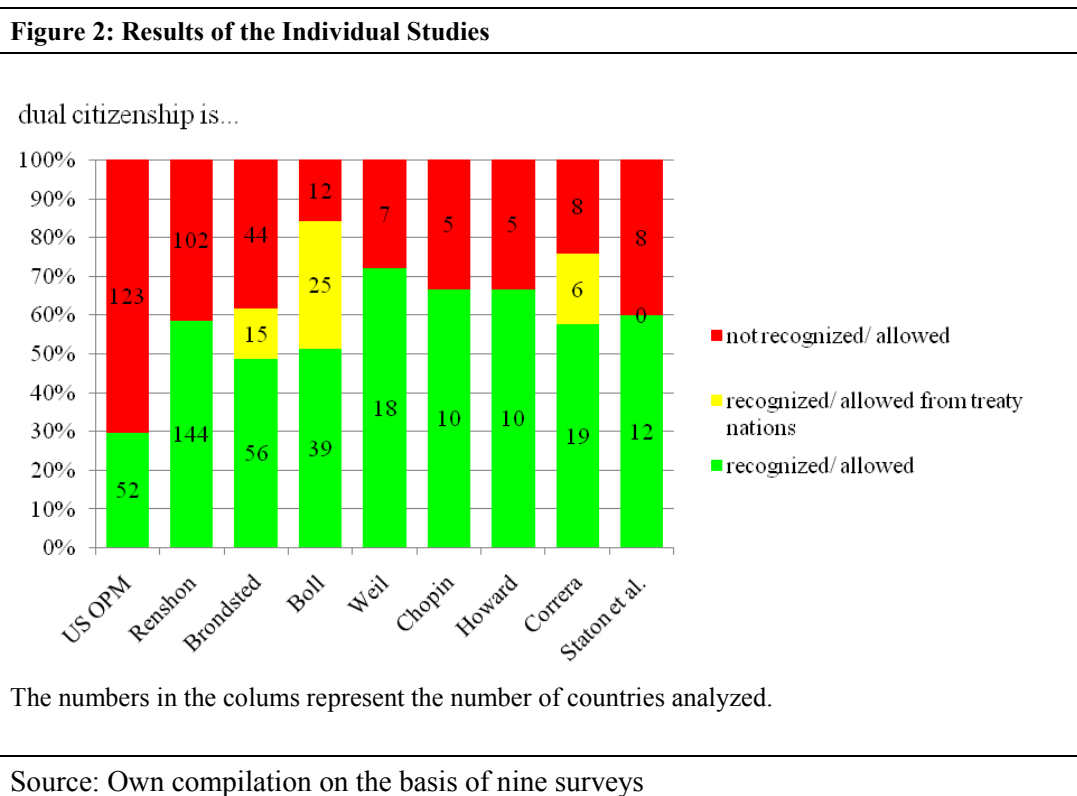
Fifth, some countries explicitly recognize the dual citizenship of citizens with treaty nations (e.g. the ex-colonies of Spain in South America and Spain), whereas others have no such differentiated acceptance policy. In some studies, this has been a core differentiation in their own classification of countries (e.g. Jones-Correra 2001, Brondsted Sejersen 2008) – in consequence, we transferred this information into our overview.

<b>Table 1: Aggregated Results of the Individual Studies</b>	<b>N</b>	<b>%</b>
<b>US OPM (N = 184, but for 9 countries no information was available)</b>	<b>175</b>	
number of countries where dual citizenship is recognized	52	29,7
number of countries where dual citizenship is not recognized	123	70,3
<b>Renshon (N= 246 ISO 3166 countries, N*= 144, *Renshon listed only positive cases)</b>	<b>246</b>	
Number of countries where dual citizenship is allowed "in some form"	144	58,5
Number of countries where dual citizenship is not allowed "in some form"	102	41,5
<b>Brondsted Sejersen (N= 115)</b>	<b>115</b>	
Number of countries where dual citizenship is allowed	56	48,7
Number of countries where dual citizenship is allowed for citizens from treaty nations	15	13,0
Number of countries where dual citizenship is not allowed	44	38,3
<b>Boll (N = 76)</b>	<b>76</b>	
Countries where dual citizenship is recognized (in respect to naturalization)	39	51,3
Countries where dual citizenship is tolerated (in respect to naturalization)	25	32,9
Countries where dual citizenship is not tolerated (in respect to naturalization)	12	15,8
<b>Weil (N = 25)</b>	<b>25</b>	
Countries where for naturalization renunciation of prior citizenship is required	7	28,0
Countries where for naturalization renunciation of prior citizenship is not required	18	72,0
<b>Chopin (N = 15)</b>	<b>15</b>	
Countries where for naturalization renunciation of original citizenship is required	5	33,3
Countries where for naturalization renunciation of original citizenship is not required	10	66,7
<b>Howard (N = 15)</b>	<b>15</b>	
Countries where dual citizenship is allowed for immigrants	10	66,7
Countries where dual citizenship is not allowed for immigrants	5	33,3
<b>Jones-Correra (N = 33)</b>	<b>33</b>	
Countries where dual citizenship is recognized	19	57,6
Countries where dual citizenship is recognized for citizens from treaty nations	6	18,2
Countries where dual citizenship is not recognized	8	24,2
<b>Staton et al. (N = 20)</b>	<b>20</b>	
Countries where dual citizenship is allowed for emigrants	12	60,0
Countries where dual citizenship is not allowed for emigrants	8	40,0
Source: Own compilation on the basis of nine surveys		

Given the very different definitions and scopes of the studies, it is not surprising that the results of the various studies are not coherent (see table 1 and figure 2). Whereas the rather early study of the US Office of Personnel Management (2001) indicates that 70% of



the analyzed countries do not recognize the second citizenship of their own citizens, Renshon’s list implies a very different message: If we take into account that the UN recognizes 246 countries (according to ISO 3166), the fact that he has found 144 countries who allow dual citizenship “in some form,” indicates that at least in three fifth of all countries in the world, dual citizens are not seen anymore as an evil which has to be avoided by all means. Also the other two studies (Boll 2007, Brondsted Sejersen 2008) with a global scope support the impression that, at the beginning of the 21<sup>st</sup> century, a majority of countries allows dual citizenship – either explicitly and general or at least with specific treaty nations or by tolerating it *de facto*. The findings of Howard (2005) and Chopin (2006) make clear that in Western Europe the acceptance of dual citizenship has grown even more – towards two thirds of all countries. The study of Weil (2001) indicates that this level of acceptance can be generalized to the Western countries and probably also the East European countries. When we compare the findings of Jones-Correra (2001) and Staton et al. (2007) it becomes clear that this level of acceptance can also be found in South, Central and North America (including the Caribbean countries) – but only if we include those countries which restrict their acceptance of dual citizenship to members of treaty nations.



Alfred M. Boll’s book is clearly the source which contains the most detailed and differentiated information on dual citizenship regulations in general and in respect to specific countries.<sup>2</sup> In consequence, we have taken it as the main authoritative source in our at-

<sup>2</sup> The report by de Groot and Vink (2008) for the Dutch Advisory Council for Alien Affairs contains also detailed information and comparisons for 18 European countries.

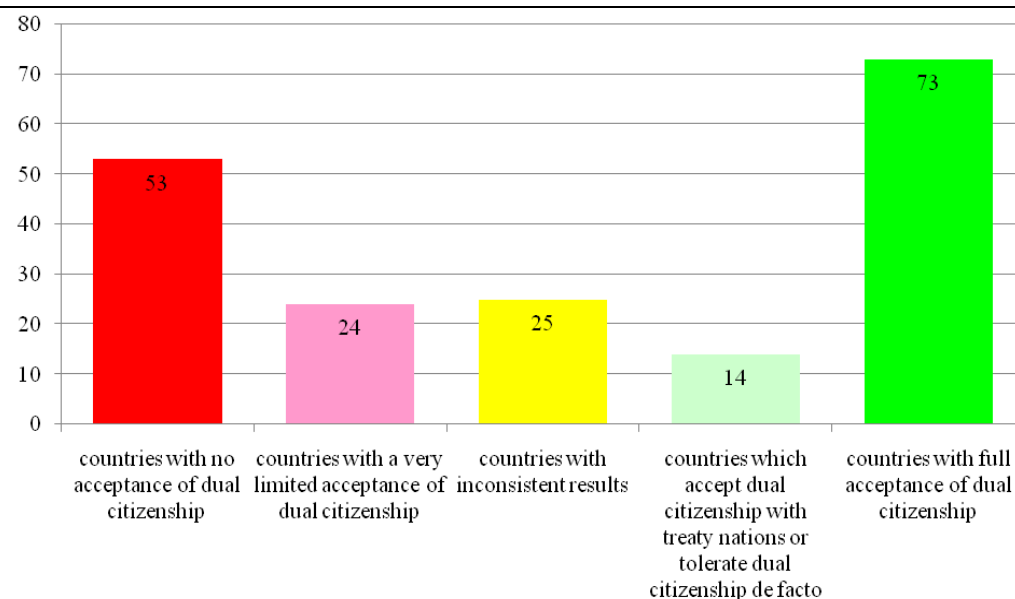
tempt to aggregate the information from all nine studies into the general picture on the (non-)acceptance of dual citizenship at the beginning of the 21<sup>st</sup> century (figure 3). Unfortunately, he covers “only” 76 countries and for all other countries we have to rely on the findings of less detailed or less transparent studies.

We applied the following transformation rules for aggregating the findings from the different studies into the classification scheme presented in figure 3:

- We classified all countries as “countries with no acceptance of dual citizenship” (red) if all sources classified it accordingly. Countries have also been included in this category if major sources (beyond US Office of Personnel Management (US OPM) whose focus is not on the regulation of the acquisition of dual citizenship) classified it as “not recognizing” but Renshon classified it as “allowing”. Renshon’s approach is too inclusive for providing an accurate picture on the current state of political acceptance of dual citizenship.
- We classified all countries as “countries with a very limited acceptance of dual citizenship” (pink) which had been classified by the US OPM as “not recognizing” but by Renshon as “allowing” dual citizenship.
- We classified all countries as “countries with inconsistent results” (yellow) if the diverse studies resulted in divergent classifications (beyond divergences with Renshon, which did not count).
- We classified all countries as “countries which accept dual citizenship with treaty nations or tolerate dual citizenship *de facto*” (light green) if studies revealed that these countries accept dual citizenship for citizens from treaty nations and/or if studies revealed that the country *de facto* tolerates dual citizenship through major formal exceptions from the rule of non-acceptance or through non-enforcement of this rule.
- We classified all countries as “countries with full acceptance of dual citizenship” (dark green) if all studies classified it accordingly (ignoring the US OPM classification where we had clear information that their classification represents not the current legislation anymore).

Figure 3 presents the aggregated findings of the nine studies with quantitative data on the acceptance of dual citizenship. From the 189 countries which have been analyzed, the largest group (73) fully accepts dual citizenship. Together with those countries which accept dual citizenship for citizens from treaty nations or which tolerate dual citizenship through many exceptions and/or non-enforcement of detrimental rules, this group is larger than the two groups of countries which either do not accept dual citizenship at all or which accept it only in a very limited way (usually for children). From 189 analyzed countries, 87 show a rather positive stance toward dual citizenship and 77 a rather negative one. It has to be mentioned, though, that it is quite probable, that those countries which are not included into these studies, either do not accept dual citizenship or just tolerate it (mainly by neglecting it).

**Figure 3: (Non-)Acceptance of Dual Citizenship at the Beginning of the 21<sup>st</sup> Century**



The numbers in the columns represent the number of countries analyzed.

Source: Own compilation on the basis of nine surveys

The other major result of the compilation of existing studies is the finding that for many countries (25) these studies did not produce consistent results. In light of our characterization of the different facets of dual citizenship at the beginning of this chapter, this comes with no surprise. Some inconsistencies might also be due to the fact that the legislation on dual citizenship is very much in flux. We take this result as a motivation for our attempt to get a more detailed picture of the current state of dual citizenship regulations in our own empirical investigation.

## **2. Beyond acceptance versus non-acceptance: a differentiated look at dual citizenship regulations and their political contexts**

In this section we present the results of an expert survey that we conducted during the summer of 2008.<sup>3</sup> The survey had three major goals:

- a) Collecting more detailed information on current national dual citizenship regulations.
- b) Documenting trends in (dual) citizenship regulations over time.
- c) Receiving information on the political salience of (dual) citizenship regulations.

<sup>3</sup> Joachim Blatter developed the questionnaire on dual citizenship during a stay at the European University Institute in Florence in March 2008. He would like to thank Professor Rainer Bauböck for the invitation, the EUI for the hospitality and the NWO for finances. Rainer Bauböck, Dilek Cinar, Marc Helbling and Marc Hojé Howard provided important feed-backs and suggestions to first drafts.

We sent a questionnaire to about 100 experts in 50 countries. We tried to cover all countries in Europe and North America and the most important migrant sending countries in respect to Europe and North America. 45 experts filled in the questionnaire for 37 countries (the list of experts who completed the questionnaire can be found at the end of this report). These experts were selected after we conducted an extensive literature survey with a focus on publications that contained details of citizenship regulations in specific countries (the literature that we found before and through the survey is also documented at the end of this report).

The fact that in eight cases we received answers from two or three different experts for the same country allowed us to reflect on the reliability of the data. Inconsistencies emerged not only in the answers to questions that refer to the political contexts and the salience of (dual) citizenship regulations. They also showed up when we asked about specific regulations. To some extent this can be seen as a result of ambiguous questions,<sup>4</sup> but it is probably also a consequence of ambiguities in existing norms and regulations.<sup>5</sup> The most prominent example for such an ambiguous situation can be found in the United States of America.<sup>6</sup> As a consequence, in the following texts and tables we will not only present aggre-

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<sup>4</sup> There exists an unavoidable trade-off between more abstract and more specific questions and definitions. A higher level of abstraction allows applying question to a broad range of diverse countries but leaves more leeway for (divergent) interpretations and classifications.

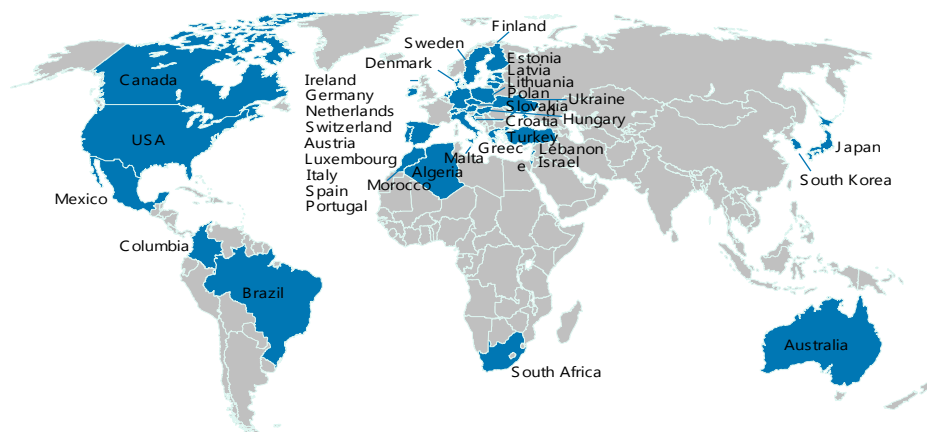
<sup>5</sup> Another reason for inconsistencies which we take as an indicator for low reliability of the data is the fact that our experts represent a non-homogeneous group with different levels of expertise in respect to various aspects of our questionnaire. We also tried to find out how much discretion administrative agencies or lower levels of government have in implementing dual citizenship regulations (as another aspect of our hypothesis that there exists a gap between formal regulations and the actual praxis). The answers to the respective answers showed either a very high level of inconsistencies among the experts who reported on the same countries or a low response level. Therefore, we decided not to present these results.

<sup>6</sup> The oath of allegiance that all naturalizing citizens have to swear includes the following wording: "I hereby declare, on oath, that I absolutely and entirely renounce and abjure all allegiances and fidelity to any foreign prince, potentate, state, or sovereignty, of whom or which I have heretofore been subject or citizens;..." Nevertheless, the oath has never been enforced and statements from the judicial and from the executive branch of government made the toleration of dual citizenship explicit. But the legislative branch has never enacted any law which would give the practised tolerance a clear-cut legal base (Spiro 1997). Given this ambiguity, it comes to no surprise that the two experts for the United States opted for different answers to our question whether dual citizenship is currently accepted or tolerated. One choose our first option "it is *de jure* accepted for both main modes of acquisition..."; the other one found the following answer more appropriate: "It is *de jure* in principle not accepted, but *de facto* it is quite common because of many exceptions and/or as a result of minimal controls."

gated data but indicate the classification of each country in each table as well. This leads to a maximum of transparency.

The clear majority of the countries in our sample are European countries (see figure 1). 20 are members of the European Union: Austria, Denmark, Estonia, Finland, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, and Sweden. Another eight countries are neighbors of the EU: Algeria, Croatia, Israel, Lebanon, Morocco, Switzerland, Turkey, and Ukraine. Our sample covers all three North American countries (Canada, Mexico, and the USA) and two countries from South America (Brazil and Columbia). The following countries from other parts of the world complete the sample: Australia, Japan, South Africa, and South Korea.

Figure 1: Countries in our sample



## 2.1 General regulations of citizenship: contexts, salience, goals and trends

### *Contexts*

The sample covers most developed Western countries that are usually the targets of immigration. Therefore, it is no surprise that in many countries of our sample (in 16 countries) recent regulation of citizenship has taking place basically in the context of debates about immigration (see table 2.1). This has also been the case in two classic migrant sending countries: Mexico and Turkey. Nevertheless, table 2.1 also reveals that in a majority of the countries in our sample nation state building is still (or again) a very important issue. In Columbia, Estonia, Greece, Latvia, Poland, South Africa, Spain and Ukraine controversies about the protection of minorities within or outside the boundaries of the nation state are

looming large. In these eight countries this discourse in providing the most important context for citizenship regulation and in eleven countries it plays a very significant role in addition to migration.

Table 2.1		Recent regulations of citizenship have taking place...	
All received answers		35	
a) ... basically in the context of debates about (im)migration	14 (+2)	Algeria, Austria, Canada, Denmark, Germany, Italy, Japan, Luxembourg, Malta, Mexico, Portugal, Slovakia, Sweden, (Switzerland), Turkey, (USA)	
b) ... basically in the context of debates about nation state building (protection/ participation of "own" minorities beyond state boundaries or of "foreign" minorities within state boundaries)	8	Columbia, Estonia, Greece, Latvia, Poland, South Africa, Spain, Ukraine	
c) ... both contexts played a very significant role	11 (+2)	Australia, Croatia, Finland, Hungary, Ireland, Israel, Lithuania, Morocco, Netherlands, Slovenia, South Korea, (Switzerland), (USA)	

Brackets "( )" indicate that the experts for these countries provided different answers.

### *Salience*

In about half of the countries in which the regulation of citizenship has taken place in the context of immigration policy, this issue has been politically very important (see table 2.2).

Table 2.2		Has the issue of immigration been a salient political issue during the last 15-20 years?	
All received answers		27	
a) It has very often been one of the top three political issues and has influenced the party system/the composition of the ruling party/coalition in government	7 (+1)	Australia, Austria, Croatia, Denmark, (Germany), Morocco, Netherlands, Switzerland,	
b) It has very often been one of the top three political issues but has not influenced the party system/composition of government significantly	3 (+4)	(Canada), Finland, (Germany), Ireland, (Israel), (Italy), Mexico	
c) It has sometimes been one of the top three political issues and dominated the public discourse during this time	8 (+2)	(Canada), Hungary, (Italy), Japan, Lithuania, Luxembourg, Slovenia, South Korea, Sweden, USA	
d) It has seldom been a major political issue	4 (+1)	Algeria, (Israel), Malta, Portugal, Turkey,	
e) It has never been a major political issue	1	Slovakia	

Brackets "( )" indicate that the experts for these countries provided different answers.

In Australia, Austria, Croatia, Denmark, Germany, Morocco, the Netherlands and Switzerland the issue of immigration has not only been very often one of the top three issues on the political agenda but it has influenced the party system and/or the composition of the ruling party or coalition in government. In another seven countries it has been very often one of the top three issues on the political agenda but without such an influence on the party system or the composition of the government. If the regulation of citizenship has been taken place in the context of nation state building the political salience of this context is even bigger. For nine countries the experts reported an influence of this issue on the party system and/or on the composition of the ruling coalition/party (see table 2.3). In another seven countries nation state building has been very often or sometimes one of the top three political issues.

Table 2.3	Has the issue of nation state building has been a salient political issue during the last 20 years?	
All received answers	22	
a) It has very often been one of the top three political issues and has influenced the party system/the composition of the ruling party/coalition in government	7 (+2)	Croatia, Estonia, (Israel), Latvia, Morocco, Netherlands, Slovenia, South Africa, (Switzerland)
b) It has very often been one of the top three political issues but has not influenced the party system/composition of government significantly	3 (+1)	Greece, Lithuania, (Switzerland), Ukraine
c) It has sometimes been one of the top three political issues and dominated the public discourse during this time	4 (+1)	Australia, Hungary, Ireland, (Israel), South Korea,
d) It has seldom been a major political issue	4	Columbia, Denmark, Finland, Poland,
e) It has never been a major political issue	2	Spain, USA

Brackets “( )” indicate that the experts for these countries provided different answers.

For the two issues, immigration and nation state building, we can differentiate between the political dimension and economic and socio-cultural aspects. When it comes to immigration policy political participation of immigrants is in most countries less important and less controversial than their economic and socio-cultural integration. Nevertheless, for Canada, Croatia, Germany, Luxembourg and Switzerland at least one expert perceives political participation as the most controversial aspect of the national integration policy (see table 2.4). The political dimension looms larger where nation state building is the primary context for citizenship regulation (see table 2.5). According to at least one expert, in Estonia, Ireland, Israel and Latvia, political membership is clearly the most important and most controversial aspect in this debate. In Croatia, Greece, Switzerland and Ukraine

it is not the most important but the most controversial aspect. Furthermore, in most countries that are still struggling with nation-state building formal political membership is as important and as controversial as the protection of economic interests and socio-cultural identities.

Table 2.4	How prominent has the aspect of POLITICAL integration/ participation (citizenship with an emphasis on political rights and duties) been in the debate on immigration (in comparison to economic and socio-cultural integration)?	
All received answers	27	
a) Political integration/participation is clearly the most important and the most controversial aspect	0	
b) Political integration/participation is not the most important but the most controversial aspect	2 (+3)	(Canada), Croatia, (Germany), Luxembourg, (Switzerland)
c) Political integration/participation is as important and as controversial as economic and socio-cultural integration	6 (+2)	(Austria), Denmark, Hungary, Italy, Morocco, Netherlands, Slovenia, (Switzerland), Turkey
d) Political integration/participation is less important and less controversial than economic and socio-cultural integration	11 (+5)	Australia, (Austria), (Canada), Finland, (Germany), Israel, Japan, Lithuania, Malta, Mexico, Portugal, Slovakia, South Korea, Sweden, (Switzerland), (USA)
e) Political integration/participation does not play any significant role	3 (+1)	Algeria, Ireland, (USA)

Brackets “( )” indicate that the experts for these countries provided different answers.

Table 2.5	How prominent has the aspect of POLITICAL membership (nationality regulations) been in the debate on nation state building (in comparison to economic and socio-cultural participation/ protection of minorities)?	
All received answers	21	
a) Political membership is clearly the most important and the most controversial aspect	3 (+1)	Estonia, Ireland, (Israel), Latvia
b) Political membership is not the most important but the most controversial aspect	3 (+1)	Croatia, (Greece), Switzerland, Ukraine,
c) Political membership is as important and as controversial as economic and socio-cultural participation/protection	9 (+2)	Australia, Columbia, (Greece), Hungary, (Israel), Lithuania, Morocco, Netherlands, Poland, Slovenia, South Africa,
d) Political membership is less important and less controversial than economic and socio-cultural participation/protection	2	Finland, South Korea,
e) Political membership does not play any significant role	2	Spain, USA

Brackets “( )” indicate that the experts for these countries provided different answers.



*Trend in respect to openness*

Our survey reveals a surprisingly clear and – maybe even more surprisingly – stable trend towards citizenship regulations that make access to national citizenship easier. For 22 countries, at least one expert concluded that overall the last reform made it easier to acquire citizenship in that country. In contrast, only nine experts reported that the last reform made it more difficult. For six experts the last reform in their country exhibits elements that make it easier to acquire citizenship and other elements that make it more difficult (see table 2.6). From the 26 experts who judged the overall direction of the second-last reform, 13 perceived the overall trend in the second-last reform also as making access to citizenship easier. In six countries the second-last reform made the acquisition of citizenship more difficult and in eight countries our experts discovered elements of both (see table 2.7).

Table 2.6	Overall, did the <b>last</b> reform make access to citizenship/nationality easier or more difficult?	
All received answers	33	
a) Easier	19 (+3)	Algeria, (Canada), Columbia, Croatia, Finland, Hungary, (Italy), Japan, Latvia, Luxembourg, Malta, Mexico, Morocco, Poland, Portugal, Slovakia, South Korea, Spain, Sweden, Switzerland, Ukraine (USA)
b) More difficult	7 (+2)	Australia, Austria, Denmark, Estonia, Germany, Ireland, (Israel), Lithuania, (USA)
c) Both	3 (+3)	(Canada), Greece, (Israel), (Italy), Netherlands, Slovenia

Table 2.7	Overall, did the <b>second-last</b> reform make access to citizenship/nationality easier or more difficult?	
All received answers	26	
a) Easier	13	Canada, Germany, Ireland, Latvia, Lithuania, Malta, Mexico, Morocco, Portugal, Slovakia, Switzerland, Ukraine, USA
b) More difficult	5	Algeria, Australia, Austria, Denmark, Netherlands, Poland
c) Both	8	Estonia, Finland, Greece, Hungary, Italy, Slovenia, South Korea, Sweden

Brackets “( )” indicate that the experts for these countries provided different answers.

If we compare the direction of change between the last and the second-last reform, in Germany, Ireland, and Lithuania we discover a turn from making citizenship acquisition easier towards being more restrictive. In contrast, the following countries stayed on a path towards more openness: Canada, Latvia, Malta, Mexico, Morocco, Portugal, Slovakia,

Switzerland, Ukraine and the United States<sup>7</sup>. For Algeria and Poland, the experts reported that the latest reform had a liberal tendency whereas the second-last reform was restrictive. In contrast, Australia and Austria have been steadily moving towards a more restrictive citizenship policy.

It has to be stressed, though, that these results point towards directions of change, they say nothing about the absolute level of openness in respect to the acquisition of citizenship. For receiving more precise information about such absolute levels of openness we concentrated our inquiry to the regulations concerning dual citizenship (see next section).

### *Goals*

Before we zoom in to the specifics of dual citizenship we have a look at the goals that were supposed to be achieved by the citizenship law reforms during the last decades (see tables 2.8 and 2.9). Until now, only a few countries seem to perceive citizenship regulations as a means to attract “useful” immigrants. The competition for human capital in the context of economic globalization has not (yet) spilled over into citizenship policy. Gender equation - another discourse which has been identified as an important source for citizenship reforms in the 20<sup>th</sup> century in the literature seems to play no big role anymore in most countries of our sample. The goal that is connected most often with citizenship reforms in the last decades is still “strengthening national identity and cohesion.” In some cases this goal leads to a more restrictive policy in respect to access to citizenship (e.g. in Australia, Estonia, Ireland, Lithuania), nevertheless, there exist also cases in which this goal correlates with citizenship regulations which made access to citizenship easier (e.g. in Hungary, Japan, Latvia, Poland and Portugal). This seems to be the case because this goal can be combined with goals which imply a less restrictive approach to granting citizenship. In the cases of Hungary and Poland, the goal to strengthen the ties to the diasporas, in combination with the goal to strengthen national identity and cohesion lead to a more inclusive citizenship policy. But also the combination with the goal to facilitate the integration of immigrants can have the same result as the examples of Latvia and Portugal show. In the last decades, both motives – facilitating the integration of immigrants and strengthening the ties to emigrants and expatriates – seem to play as similar broad role in citizenship policies.

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<sup>7</sup> We have inconsistent classifications for the US because of different judgments of what has been the last relevant reform. If we take the answers of the expert which judged on the ba-

Table 2.8		
What were the main goal(s) of the last reform? More than one answer is possible!		
a) Attracting new immigrants (e.g. skilled workers)	1 (+3)	Finland, (Israel), (Switzerland), (USA)
b) Facilitating the integration of existing immigrants	8 (+4)	(Austria), (Canada), Finland, (Greece), (Italy), Latvia, Netherlands, Portugal, Slovenia, Sweden, Switzerland, Ukraine
c) Strengthening ties to emigrants or diasporas	9 (+4)	Finland, (Greece), Hungary, (Israel), (Italy), Malta, Morocco, Netherlands, Poland, Slovenia, Spain, (Sweden), Turkey
d) Gender equalization	3 (+2)	Algeria, (Canada), Morocco, Slovakia, (Switzerland)
e) Strengthening national identity/cohesion	15 (+2)	Australia, Brazil, Estonia, (Germany), Greece, Hungary, Ireland, Israel, (Italy), Japan, Latvia, Lithuania, Netherlands, Poland, Portugal, Slovenia, South Africa
f) Securing autonomy/integrity/safety for the native population	4 (+1)	Estonia, (Germany), Poland, South Africa, South Korea
Table 2.9		
What were the main goal(s) of the second-last reform? More than one answer is possible!		
a) Attracting new immigrants (e.g. skilled workers)	1 (+1)	(Germany), Japan,
b) Facilitating the integration of existing immigrants	7 (+3)	(Austria), (Canada), Estonia, Germany, Japan, Morocco, Netherlands, Slovenia, (Switzerland), Ukraine
c) Strengthening ties to emigrants or diasporas	9 (+2)	Estonia, Greece, Hungary, (Italy), Lithuania, Malta, Portugal, Slovenia, Spain, (Sweden), Turkey
d) Gender equalization	2 (+4)	(Canada), Portugal, South Korea, (Sweden), (Switzerland), (USA)
e) Strengthening national identity/cohesion	11 (+4)	Algeria, Brazil, (Canada), Estonia, Finland, (Greece), Hungary, Ireland, (Israel), (Italy), Latvia, Morocco, Slovakia, Slovenia, Ukraine
f) Securing autonomy/integrity/safety for the native population	2 (+2)	Estonia, Finland, (Greece), (Israel)

Brackets “( )” indicate that the experts for these countries provided different answers.

A remarkable contrast emerges when we look at the answers to the question: What were the main goal(s) of the major failed reform attempt? Failed reform attempts have been significantly less often connected to the goal of strengthening national identity or cohesion than successful reform proposals (see table 2.10).

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sis of the two latest “immigration acts” (1952 and 1990), the US has been on a consistent path towards making access to citizenship easier.

Table 2.10	What were the main goal(s) of major <b>failed reform attempt</b> ? More than one answer is possible!	
a) Attracting new immigrants (e.g. skilled workers)	1 (+2)	(Germany), Lebanon, (Switzerland)
b) Facilitating the integration of existing immigrants	7 (+4)	(Austria), (Germany), Italy, Latvia, Morocco, Netherlands, Poland, Spain, (Sweden), Switzerland, (USA)
c) Strengthening ties to emigrants or diasporas	4 (+1)	Hungary, (Italy), Lithuania, Lebanon, Poland,
d) Gender equalization	1	Lebanon
e) Strengthening national identity/cohesion	2 (+3)	(Austria), (Canada), (Germany), Hungary, Poland
f) Securing autonomy/integrity/safety for the native population	4 (+3)	(Germany), (Israel), Latvia, Poland, Portugal, Slovenia, (USA)

This confirms the importance of this goal not only as a still widespread motive but as an important success factor. It is important to realize that this motive does neither necessarily lead to a more restrictive citizenship policy in general nor to the non-acceptance of dual citizenship as we will see in the next chapter.

## 2.2 Reregulating dual citizenship: salience, specifics, drivers and consequences

Given the high political salience of immigration and nation state building in many countries, it comes with no surprise that new citizenship regulations have been introduced in recent years. Yet it remains remarkable that new regulations have been introduced in ALL countries of our sample<sup>8</sup> – although it might well be that there exists a systematic bias in our sample since it is plausible that among the experts we asked the ones who reported on countries in which changes have taken place have been more motivated to respond. In 23 countries (out of 35 countries for which we received answers to this question) there has been a change in citizenship law with an effect on dual citizenship since the year 2000. All other countries in our sample changed their citizenship laws during the 1990s. For the majority of the countries, the latest reform of regulations with an impact on the acceptance of dual citizenship has not been the only one taking place in recent years. 20 countries have had another reform just a few years before the latest reform and for about half of the countries the experts reported reform attempts which failed since 1990.<sup>9</sup>

<sup>8</sup> The only exception is Denmark. But in Denmark, attempts to reform the citizenship law have been underway in mid-2008 when we conducted our survey.

<sup>9</sup> The year and the name of the regulation which the experts have seen as the last and the second-last reforms of citizenship law or of other regulations which have had an effect on

*Salience of dual citizenship regulations*

Asked how important the issue of dual citizenship was in the latest reform of the citizenship law, 10 experts reported that dual citizenship was absolutely central in the country they reported on. This is about a third of all responses to this question, about another third answered that dual citizenship was not important at all and the remaining third rated the importance of dual citizenship in the latest citizenship reform in between (see table 2.11). We received similar balanced response rates when we asked about the importance of dual citizenship in the second-last reform. Interestingly, though, when we asked how important the aspect of dual citizenship was in failed attempts to reform the national citizenship law, almost all of the 15 experts who responded to this question, reported that dual citizenship was absolutely central or very central.

Table 2.11		How important/central was the issue of dual citizenship in the <b>last reform</b> ?
All answers	33	
a) 1 = central	9 (+1)	Finland, Italy, Lithuania, Malta, Mexico, Morocco, South Korea, Sweden, (Switzerland), Turkey
b) 2	4 (+1)	(Canada), Hungary, Luxembourg, Netherlands, Spain
c) 3	3 (+2)	(Austria), Poland, Portugal, (Switzerland), Ukraine
d) 4	4 (+2)	Algeria, Brazil, (Canada), Estonia, (Greece), Slovenia
e) 5 = not important at all	9 (+3)	Australia, (Austria), Columbia, Croatia, (Greece), Ireland, Israel, Japan, Latvia, Slovakia, (Switzerland), USA

Note: Brackets “( )” indicate that the experts for these countries provided different answers.

*Acceptance and tolerance of dual citizenship*

When we look at the current state of affairs in respect to the regulation of dual citizenship, we discover that our sample contains almost only countries that now accept or at least tolerate dual citizenship. Only Austria, Lithuania and South Korea neither accept dual citizenship *de jure* nor tolerate it *de facto* because they have almost no exceptions and strictly enforce their restrictive regulations. Since our perspective on dual citizenship has been strongly colored by prior knowledge of the situations and developments in the Netherlands, Germany and the United States, we have been surprised by the fact that in 21 countries dual citizenship is not only tolerated but *de jure* accepted for the two main

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dual citizenship are documented in the raw data set which will be available online. One of the major reasons for inconsistencies in the answers of the experts which reported about the same country results from the fact, that very often they have taken different legal acts as “last reform” and “second last reform” in our questionnaire.

modes of acquisition (by birth and by naturalization) – and that this formal acceptance is symmetric. Emigrants, who acquire another nationality abroad, can keep the citizenship of these countries; but also immigrants can keep the citizenship of their country of decent when they become citizens of these countries (see table 2.12). Quite a few countries accept dual citizenship mainly for children of bi-national couples– but not all countries which have been put into this category (because it comes closest to representing their main approach) require the dual citizens to choose among their citizenship when they reach maturity (e.g. Denmark does not).

Table 2.12   Is dual citizenship <b>currently</b> accepted/tolerated?		
All received answers	36	
a) It is <i>de jure</i> accepted for <b>both main modes of acquisition</b> : by birth and by naturalization for both - <b>immigrants and emigrants</b>	21 (+1)	Brazil, Canada, Columbia, Croatia, Finland, Greece, Hungary, Ireland, Israel, Italy, Lebanon, Malta, Mexico, Morocco, Portugal, Slovakia, South Africa, Spain, Sweden, Switzerland, Turkey, (USA)
b) It is <i>de jure</i> accepted for both main modes of acquisition: by birth and by naturalization, but <b>only for emigrants</b>	1	Slovenia
c) It is <i>de jure</i> accepted but <b>only for one mode of acquisition: by birth</b> and requires the choice for one citizenship on reaching maturity	6 (+1)	Algeria, Australia, (Austria), Denmark, Estonia, Luxembourg, Ukraine
d) It is <i>de jure</i> in principle not accepted, but <i>de facto</i> it is quite common because of <b>many exceptions</b> and/or as a result of <b>minimal controls</b>	4 (+1)	Germany, Japan, Latvia, the Netherlands, Poland, (USA)
e) It is <i>de jure</i> not accepted and <i>de facto</i> minimized because of (almost) <b>no exceptions and strong controls</b>	2 (+1)	(Austria), Lithuania, South Korea

Only in Germany, Japan, Latvia, the Netherlands, Poland, and the USA, there is a gap between (some) principled norms and rules, which are restrictive, and the praxis, which is more tolerant. This tolerance can be a consequence of the fact that laws and other formal regulations include many exceptions from the general restrictive principle or can result from a lenient enforcement of restrictive norms.

Since we are interested in the long-term development of dual citizenship regulations we asked our experts also whether dual citizenship was accepted or tolerated before the latest reform and before the second-last reform. Although we have to acknowledge growing inconsistencies in the responses to these answers, the general trend is clear (see tables 2.13 and 2.14).

Table 2.13   Was dual citizenship accepted/tolerated <b>before the last reform?</b>		
All received answers	34	
a) It is <i>de jure</i> accepted for <b>both main modes of acquisition</b> : by birth and by naturalization for both - <b>immigrants and emigrants</b>	12 (+3)	Croatia, Greece, Hungary, Ireland, Israel, (Italy) Malta, Mexico, Morocco, Portugal, South Africa, Spain, (Switzerland), Turkey, (USA)
b) It is <i>de jure</i> accepted for both main modes of acquisition: by birth and by naturalization, but <b>only for emigrants</b>	3 (+1)	Lithuania, Lebanon, Slovenia, (Switzerland)
c) It is <i>de jure</i> accepted but <b>only for one mode of acquisition: by birth</b> and requires the choice for one citizenship on reaching maturity	3 (+2)	(Austria), Canada, Estonia, (Sweden), Ukraine
d) It is <i>de jure</i> in principle not accepted, but <i>de facto</i> it is quite common because of <b>many exceptions</b> and/or as a result of <b>minimal controls</b>	7 (+3)	Australia, Finland, Germany, (Italy), Japan, Latvia, Luxembourg, Poland, (Sweden), (USA)
e) It is <i>de jure</i> not accepted and <i>de facto</i> minimized because of (almost) <b>no exceptions and strong controls</b>	4 (+1)	Algeria, (Austria), Columbia, Slovakia, South Korea

Table 2.14   Was multiple/dual citizenship accepted/tolerated <b>before the second-last reform?</b>		
All received answers	29	
a) It is <i>de jure</i> accepted for <b>both main modes of acquisition</b> : by birth and by naturalization for both - <b>immigrants and emigrants</b>	9 (+1)	Greece, Ireland, Malta, Mexico, Morocco, Portugal, Slovakia, South Africa, Spain, (USA)
b) It is <i>de jure</i> accepted for both main modes of acquisition: by birth and by naturalization, but <b>only for emigrants</b>	4	Hungary, Lithuania, Slovenia, Switzerland
c) It is <i>de jure</i> accepted but <b>only for one mode of acquisition: by birth</b> and requires the choice for one citizenship on reaching maturity	0 (+1)	(Austria)
d) It is <i>de jure</i> in principle not accepted, but <i>de facto</i> it is quite common because of <b>many exceptions</b> and/or as a result of <b>minimal controls</b>	7 (+1)	Australia, Germany, Japan, Latvia, Luxembourg, Turkey, Ukraine, (USA)
e) It is <i>de jure</i> not accepted and <i>de facto</i> minimized because of (almost) <b>no exceptions and strong controls</b>	7 (+1)	Algeria, (Austria), Estonia, Finland, Lebanon, Poland, South Korea, Sweden

Within our sample, the number of countries that fully and formally accept dual citizenship has steadily grown and the number of countries that neither *de jure* accept nor *de facto* tolerate dual citizenship has steadily declined. With the notable exception of the Netherlands, no country in our sample has experienced any reform in citizenship law that reduced the existing openness towards dual citizenship. In the Netherlands, a reform of the citizenship law in 1993 brought a full-fledged acceptance of dual citizenship for immigrants (but not for long term emigrants) by abolishing the renunciation requirement for those who naturalize in the Netherlands. Another reform, adopted in 2000, reinstated the

renunciation requirement for immigrants and at the same time provided the long-term acceptance of dual citizenship for expatriates (de Hart 2007: 88-94).

*(A) Symmetry of dual citizenship regulations*

Against the background of the Dutch experience, which exemplifies a perceived general trend towards a re-ethnicization and de-territorialization of citizenship based on the *ius sanguinis* principle (see Joppke 2003, Cinar 2008), the following results in respect to the symmetry or asymmetry of dual citizenship regulations are remarkable. We asked our experts whether the regulations on dual citizenship are/were symmetric in respect to emigrants and immigrants. Unfortunately, we did not ask whether an asymmetric regulation favors emigrants or immigrants, but we provided the following explanation and specifications to this question:<sup>10</sup>

The regulations are fully symmetric if they have the following features:

- (a) it does not matter which nationality has been acquired first for the (non-)acceptance of dual nationality upon naturalization, which means that the country under consideration demands the same from immigrants which want to naturalize in this country as from the emigrants which want to naturalize in another country (de facto, de jure or no renunciation of the other citizenship) - this aspect should be given double weight in comparison to the following aspects;
- (b) children of mixed marriages get citizenship of the country under consideration irrespective of whether they are born in that country or in the country of nationality of the other parent;
- (c) it does not matter which nationality has been acquired first when it comes to rights and restrictions for political participation (voting, taking offices), which means that immigrants (which have acquired the nationality of the country under consideration after the nationality of the country of origin) have exactly the same rights and restrictions than emigrants (which have acquired the nationality of the country under consideration before the nationality of the other country);
- (d) it does not matter which nationality has been acquired first in respect to issues like military service, diplomatic protection and judicial cooperation (e.g. extradition of criminals) – because these issues are regulated on the basis of other principles like e.g. habitual residence.

Currently, 22 out of 29 countries have fully symmetric or almost fully symmetric regulations in respect to emigrants and immigrants. From our sample, only Israel, Mexico, Poland, Japan, Latvia and Turkey discriminate between emigrants and immigrants (see table 2.15).

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<sup>10</sup> We have to acknowledge that this question has been at the same time too overloaded with different aspects and not inclusive enough in respect to an important aspect (the direction of potential asymmetries).



We asked the same question in respect to the situation before the last reform (see table 2.16).<sup>11</sup> The responses reveal that the latest reforms tended to make dual citizenship regulations more symmetrical since a few countries moved from a more asymmetrical situation towards a more symmetrical situation: This is the case for Israel (which nevertheless still exhibits rather asymmetrical regulations), as well as for Finland, Portugal, Sweden and Switzerland. Although a closer look at these cases would be necessary in order to reach a solid conclusion, these results provide some evidence for the following hypothesis: The growing inclination of states to accept emigrants and expatriates as their citizens is not so much a shift from a territorial conception of citizenship towards an ethnic or *uis sanguinis*-based definition of citizenship as it is a shift towards an expansive and non-exclusive notion of citizenship.

Table 2.15	Are the regulations on dual citizenship <b>currently</b> symmetric in respect to emigrants and immigrants?	
All received answers	29	
a) 1 = fully symmetric	13	Algeria, Columbia, Finland, Greece, Hungary, Ireland, Italy, Morocco, South Korea, Spain, Sweden, Ukraine, USA
b) 2	9	Australia, Austria, Croatia, Estonia, Germany, Portugal, Slovakia, Slovenia, Switzerland
c) 3	2	Israel, Mexico
d) 4	1	Poland
e) 5 = fully asymmetric	3	Japan, Latvia, Turkey

Table 2.16	Were the regulations on dual citizenship symmetric in respect to emigrants and immigrants <b>before the last reform</b> ?	
All received answers	27	
a) 1 = fully symmetric	9 (+1)	Algeria, Greece, Hungary, Ireland, (Italy), Morocco, South Korea, Spain, Ukraine, USA
b) 2	6 (+1)	Australia, (Austria), Croatia, Estonia, Germany, Slovakia, Slovenia,
c) 3	2 (+2)	(Austria), (Italy), Sweden, Turkey
d) 4	3 (+1)	Netherlands, Poland, Portugal, (Switzerland)
e) 5 = fully asymmetric	4 (+1)	Finland, Israel, Japan, Latvia, (Switzerland)

<sup>11</sup> We also asked about the situation before the second-last reform. The response rate to this question dropped sharply so that we cannot draw any conclusion in respect to the long term development.

*Dual nationals and political participation*

In the normative debate on dual citizenship even some of those who endorse the acceptance of dual citizenship in general argue for some restrictions when it comes to taking offices or in respect to political participation in both countries at the same time ( Bauböck 2003: 33, Alainikoff and Klusmeyer 2002: 41). Our survey reveals that most countries in our sample are more tolerant. Only in Australia, Columbia and South Korea dual citizens are not allowed to take political offices. Finland, Japan and Mexico apply such a restriction only for higher-level political offices. All other countries allow dual citizens to be political representatives and/or executives at all levels (for Israel and Sweden we received inconsistent results, see tables 2.17 and 2.18).

Table 2.17		Are dual nationals legally allowed to take a <b>lower-level</b> political office?
All received answers	28	
a) Yes	25	Algeria, Austria, Croatia, Denmark, Estonia, Finland, Greece, Hungary, Ireland, Israel, Italy, Japan, Lebanon, Latvia, Morocco, Netherlands, Poland, Portugal, Slovenia, South Africa, Spain, Sweden, Switzerland, Turkey, USA
b) No	3	Australia, Columbia, South Korea

Table 2.18		Are dual nationals legally allowed to take a <b>higher-level</b> political office?
All received answers	31	
a) Yes	23 (+2)	Algeria, Austria, Croatia, Denmark, Estonia, Greece, Hungary, Ireland, (Israel), Italy, Latvia, Lebanon, Lithuania, Morocco, Netherlands, Poland, Portugal, Slovakia, Slovenia, South Africa, Spain, (Sweden), Switzerland, Turkey, USA
b) No	6 (+2)	Australia, Columbia, Finland, (Israel), Japan, Mexico, South Korea, (Sweden)

Almost all countries tolerate that dual citizens participate politically at the same time in their country of origin and in the country of residence although only a minority seems to do so explicitly (see table 2.19). In most countries these issues have not reached political salience but in the Netherlands, South Korea, Algeria and Japan the right of dual nationals take political offices has been an issue of intensive public debate and in a quite a few other countries it has been controversially discussed, as well (see table 2.20).

Table 2.19		Are dual citizens who participate in politics in the country of origin restricted in their rights to participate in politics in the country of residence?	
All received answers	29		
a) It is <i>de jure</i> accepted that they participate in both countries	4 (+2)	Brazil, Columbia, (Greece), Hungary, Ireland, (Switzerland)	
b) They are not restricted because the issue is not explicitly regulated (tolerance)	18 (+2)	Algeria, Austria, Croatia, Denmark, Estonia, Finland, (Greece), Israel, Italy, Japan, Lebanon, Mexico, Morocco, Netherlands, Poland, Slovakia, Slovenia, Sweden, (Switzerland), USA	
c) They are <i>de jure</i> restricted, but there exist major/many exceptions	0		
d) They are <i>de jure</i> restricted, but in reality are not, because of no/minimal controls	4	Australia, Luxembourg, Portugal, South Africa	
e) They are <i>de jure</i> and <i>de facto</i> restricted, because of strict controls	1	South Korea	

Table 2.20		Was the right of dual nationals to take political offices an issue of public controversy?	
All received answers	32		
a) 1 = intensive debate	2	Netherlands, South Korea,	
b) 2	2	Algeria, Japan	
c) 3	6	Australia, Finland, Hungary, Lithuania, Poland, Turkey	
d) 4	3 (+3)	(Austria), Estonia, Latvia, Mexico, (Sweden), (USA)	
e) 5 = no public debate	17 (+3)	(Austria), Brazil, Columbia, Croatia, Denmark, Greece, Ireland, Israel, Italy, Lebanon, Luxembourg, Morocco, Portugal, Slovakia, South Africa, Spain, (Sweden), Switzerland, Ukraine, (USA)	

Until now, we looked at the political salience and the specific regulations of dual citizenship. In the following two sections, we provide some information which feeds into the discussion of how to explain the trend towards a more liberal stance towards dual citizenship and we briefly address a notorious topic in the discussion about the consequences of dual citizenship: Security – for (the international system of) nation states and for individuals.

#### *Initiators and driving forces*

In the literature on dual citizenship we can discover two quite different approaches towards explaining the results of recent changes in the regulation of dual citizenship. On the one hand side, there are broad macro-explanations for the long-term trend towards more openness. Kivisto and Feist (2007: 107-110) list five reasons for the proliferation of dual citizenship: a) increased levels of migration, b) the reduced salience of concerns over dip-

lomatic protection of citizens that accompanies the rise of concerns over human rights, c) the success of the woman's movement for gender equality, d) the shifting interests of immigrant sending countries and e) the dissolution of empires and nations. On the other hand, we have in-depth case-studies which provide detailed information about the actors and the processes of citizenship reforms in specific countries (e.g. the contributions in Faist 2007). With the following question about the main initiators or driving forces we tried to get some information which is actor-centered and more generalizable than single case-studies. The answers in the tables 2.21 to 2.23 reveal the relatively strong importance of emigrants/expatriates in the latest citizenship reforms with an impact on the acceptance of dual citizenship – mainly, but not only in migrant sending countries. Furthermore, the answers make clear that the governments are the main actors in the field of (dual) citizenship policy.<sup>12</sup>

Table 2.21	If there has been a successful or a failed attempt to accept/tolerate dual citizenship, which actors have been the main initiator/driving forces <b>in the last reform?</b> (multiple answers possible)	
a) The government	17 (+1)	Estonia, Finland, Hungary, Israel, (Italy), Japan, Lebanon, Netherlands, Poland, Portugal, Slovakia, Slovenia, South Africa, Spain, Sweden, Switzerland, Turkey, Ukraine
b) Immigrant groups	2 (+3)	Luxembourg, Mexico, (Sweden), (Switzerland), (USA)
c) Liberal parties / Human rights activists	2 (+3)	(Italy), Morocco, Portugal, (Switzerland), (USA)
d) Courts	3 (+1)	Israel, Japan, Lithuania, (USA)
e) Emigrant groups/Expatriates	9 (+2)	Columbia, Estonia, Hungary, (Italy), Lithuania, Morocco, Poland, Slovenia, Sweden, (Switzerland), Turkey
f) Foreign governments (indirectly, through policies affecting emigrants)	3 (+1)	Lebanon, Mexico, Slovenia, (Switzerland), (USA)
g) International/Supranational Organizations, e.g. the European Union	3 (+1)	Mexico, Portugal, (Switzerland), Ukraine

<sup>12</sup> The fact that we are not able to say anything about the specific goals and strategies which have been pursued by the governments points to the limits of our method. Furthermore, we acknowledge that for a real understanding of the political processes we probably would have to disaggregate "the government".

Table 2.22	If there has been a successful or a failed attempt to accept/tolerate dual citizenship, which actors have been the main initiator/driving forces <b>in the second-last reform?</b>	
a) The government	14 (+4)	Australia, (Austria), Estonia, Germany, Hungary, (Israel), (Italy), Japan, Latvia, Netherlands, Portugal, Slovakia, Slovenia, South Africa, Spain, (Switzerland), Turkey, Ukraine
b) Immigrant groups	2 (+1)	Australia, Mexico, (Sweden)
c) Liberal parties / Human rights activists	3 (+3)	(Germany), (Italy), Morocco, Slovenia, South Africa, (Switzerland)
d) Courts	1 (+2)	(Israel), (Italy), Japan,
e) Emigrant groups/Expatriats	6 (+2)	Australia, Estonia, Hungary, Lithuania, Portugal, (Sweden), (Switzerland), Turkey
f) Foreign governments (indirectly, through policies affecting emigrants)	4	Australia, Lithuania, Mexico, Morocco
g) International/Supranational Organizations, e.g. the European Union	4	Mexico, Morocco, Slovenia, Ukraine

Table 2.23	If there has been a successful or a failed attempt to accept/tolerate dual citizenship, which actors have been the main initiator/driving forces <b>in the failed reform attempt?</b>	
a) The government	5 (+3)	(Germany), Japan, Netherlands, Poland, Portugal, (Sweden), (Switzerland), Ukraine
b) Immigrant groups	3 (+1)	Hungary, Mexico, Morocco, (Switzerland)
c) Liberal parties / Human rights activists	2 (+3)	(Austria), (Germany), (Italy), Lebanon, Morocco
d) Courts	2	Japan, Lithuania
e) Emigrant groups/Expatriats	4	Lebanon, Lithuania, Poland, South Korea
f) Foreign governments (indirectly, through policies affecting emigrants)	1	Mexico
g) International/Supranational Organizations, e.g. the European Union	0	

*Security consequences for the international system and for individuals*

Security issues were predominant at the beginning of the debates and regulations of dual citizenship and lead to norms and regulations which tried to avoid dual citizenship on the national and international level. The rising acceptance of dual citizenship has been (partly) explained by the decline of conscription and the rise of professional militaries (Triadafilopoulos 2007) and by declining salience of concerns over diplomatic protection Kivisto and Feist (2007: 108). The results of our inquiry (tables 2.24 and 2.25) do confirm these general assumptions but also point to some exceptions. In the international conflicts that Morocco experienced concerning dual citizens both issues showed up: military service and diplomatic protection.

Table 2.24	Has the issue of military service of dual citizens been an issue of international conflicts and/or of international treaties with other countries since 1990?	
a) Serious international conflict	1	Morocco
b) International tension	3 (+1)	(Israel), Mexico, Morocco, South Africa
c) International treaty	7 (+4)	Denmark, Finland, (Greece), Hungary, (Italy), Mexico, Morocco, (Sweden), (Switzerland), Turkey, Ukraine
d) No conflicts, tensions and treaties	7 (+1)	Algeria, Croatia, Ireland, Japan, Luxembourg, Slovenia, South Korea, (Switzerland)
e) I do not know	2 (+1)	Poland, (Switzerland), USA

Table 2.25	Has the issue of diplomatic protection of dual citizens been an issue of international conflict since 1990?	
Major international conflict 1 => 5 No international conflict	33	
a) 1	0	
b) 2	1	Morocco
c) 3	1 (+1)	Croatia, (USA)
d) 4	5 (+1)	Denmark, Mexico, Netherlands, South Africa, Sweden, (USA)
e) 5	25	Algeria, Australia, Austria, Columbia, Estonia, Finland, Germany, Greece, Hungary, Ireland, Italy, Japan, Latvia, Lebanon, Lithuania, Luxembourg, Poland, Portugal, Slovakia, Slovenia, South Korea, Spain, Switzerland, Turkey, Ukraine

It has been suggested that the new securitization of immigration and citizenship since 9/11 does not lead to a rejection of dual citizenship but to a cynic embracement of dual citizenship by those who advocate tough measures against immigrants (Triadafilopoulos 2007: 37 with reference to Nyers). Dual citizens can more easily be stripped of their nationality by countries which perceive them as threats since they do not end up with having no na-

tionality (Macklin 2007). Our review shows that this line of argumentation has not been taken up in many countries (table 2.26). Those experts who have reported these kinds of argumentation in the discourse on dual citizenship have observed it primarily in argumentations by those who argue against the use of citizenship regulations as policy measures in the fight against terrorists and criminals. This leads to rather paradoxical lines of argumentation. In the Dutch debate, for example, D66, the most liberal party in respect to immigration and dual citizenship, used this argument in their attempts to stop a government proposal that aimed at reducing dual citizenship. D66 argued that the reduction of dual citizenship would make it impossible to banish immigrant terrorists.<sup>13</sup>

The fact that our Dutch expert reported that this line of argumentation has been used as an argument against dual citizenship in the Netherlands (see table 2.6) points either to the fact that in recent times advocates of liberal immigration and citizenship policies have become aware of the potential danger of dual citizens for being expelled. It probably points more to the fact that for both conservatives and liberals, the link between dual citizenship and security becomes very ambivalent. Conservatives/communitarians, which care more about the security of the native community, might be tempted by the opportunity to expel and denaturalize unwanted immigrants. Nevertheless, their general belief that loyalties cannot be divided makes them reluctant in perusing this strategy. Progressives and liberals, who put more emphasis on the security of individuals/migrants, usually do not want to argue as opportunistic as D66 and ignore the potential negative side-effects of dual citizenship for the security of dual citizens.

Table 2.26	Has the point that it might be easier for states to denaturalise a citizen who has dual citizenship, played a role in public debates on dual citizenship or in governmental considerations for changing (the application of) citizenship regulations?	
All received answers	33	
a) Yes, as an argument for dual citizenship	1	Morocco
b) Yes, as an argument against dual citizenship	5 (+1)	Mexico, Netherlands, Slovenia, (Switzerland), Ukraine, USA
c) No	26 (+1)	Algeria, Australia, Austria, Brazil, Columbia, Croatia, Estonia, Finland, Germany, Greece, Hungary, Ireland, Israel, Italy, Japan, Latvia, Lithuania, Luxembourg, Poland, Portugal, Slovakia, South Africa, South Korea, Spain, Sweden, (Switzerland), Turkey

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Press release of D66, 13.9. 2006 (<http://www.d66.nl/9359000/1/j9vvhc6cwgbojx9/vhe02yykwnzp?ctx=vhduiy1wuwyy>)

## 2.3 Summary and Conclusion

Our data reveals the high political salience of citizenship regulations in many countries and the fact that the acceptance of dual citizenship is often a very controversial aspect of citizenship reforms. In line with the data in the first part of the paper, our data shows a steady trend towards broader acceptance of dual citizenship. Furthermore, we discover a trend towards more symmetric regulations of dual citizenship insofar that emigrants and immigrants are treated similar. Although this is mainly due to the fact that dual citizenship is facilitated for emigrants we do not interpret this as a re-ethnicization of citizenship but as a trend towards an expansive and non-exclusive notion of citizenship. Contrary to many normative theorists, most countries do not apply any restrictions for dual citizens in respect to political participation and in respect to taking political offices. Finally, our data does not confirm any “securitization” discourses. Both, the traditional/conservative fear that dual citizens might produce military or diplomatic conflicts between states and the liberal/critical warning that dual citizenship might be used for expelling and denationalizing migrants, which are perceived as threats to the host society, have proven unwarranted (so far).

We would like to end with a cautionary note. The use of an expert survey made it possible to go beyond case studies and beyond the narrow data sets which primarily contain legal information about the current state of regulations but it comes with a price in respect to the reliability of our data. The inconsistencies between the answers of the experts which have filled in the questionnaire for the same country made this very clear. Nevertheless, we think that the survey provides an accurate picture of general tendencies and trends. For those who need more specific information about single countries we provide the list of our country experts and an extensive list of further literature.

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**Appendix to chapter 1:**

**Table A: Information on surveys with information on dual citizenship**

Author/ Publisher	Type of Information/Classification by the Authors and the Transformation into Our Coding Scheme	Number/ Range of Countries	Year of data collection	Ways of data collection	Bibliographic information
<b>United States Office of Personnel Management, Investigations Service</b>	<p>The directory provides a very brief overview on the citizenship laws of the world. For every country there is a clear coding in respect to dual citizenship, either as “recognized” or as “not recognized”. No clear-cut description is given on the criteria for this classification. In the introduction it is stated that this coding refers to the recognition “of a person’s prerogative to rights, privileges, or immunities that may be the prerogatives of citizens of the other nation” (p. 6) but the sections on the exceptions from the general approach to dual citizenship point to the fact that not only the treatment of dual citizens is taken into account but also the rules for acquisition of dual citizenship.</p> <p>For our overview, we stick to the basic dichotomous coding:</p> <p>a) recognized b) not recognized</p>	190 global	2000	Information from embassies, The Library of Congress and the Department of State	<p>United States Office of Personnel Management, Investigations Service (2001): Citizenship Laws of the World. &lt;<a href="http://www.opm.gov/extra/investigati/IS-o1-pfd">http://www.opm.gov/extra/investigati/IS-o1-pfd</a>&gt;</p>
<b>Stanley Renshon</b>	<p>Renshon, a political scientist and leading anti-dual-citizenship advocate takes into account all potential ways by which a person in the United States may acquire multiple citizenships. This leads to a very extensive list of all countries who allow dual citizenship "in some form." He includes also those countries have no provision for dual citizenship but allow children of nationals born abroad to retain their home-country citizenship. We present only the "positive cases" men-</p>	151 global, only positive cases	No explicit information (between 2000-2004)	Renshon draws on existing academic publications and did his own investigation by contacting embassies. His questions did not include whether immigrants are allowed to keep their former citizenship but did only focus on expatriates and	Renshon, S. (2005): The 50% American. Immigration and National Identity in an Age of Terror. Washington/DC: Georgetown University Press; list of countries which accept dual citizenship is provided in the appendix, pp. 255-260.

	tioned by Renshon where dual citizenship is "allowed" since we do not know how far he has investigated into all the other countries in our list.			emigrants (Renshon 2005: 32).	
<b>Tanja Brondsted Sejersen</b>	Sejersen, a social scientist, classifies the countries according to whether they allow dual citizenship. We transferred her five levels into three categories: Dual citizenship a) allowed [level 1: for the majority of the population] b) allowed with treaty nations [level 2] c) Not allowed [level 3: for children and adolescents only, level 4: under special circumstances, level 5: never]	115 (global)	2007	Brondsted Sejersen analyzed official state Web sites and journal and newspaper articles	Brondsted Sejersen, Tanja B. (2008): "I Vow to Thee My Countries" - The Expansion of Dual Citizenship in the 21st Century, in: IMR Vol. 42, p. 523-549.

<p><b>Alfred M. Boll</b></p>	<p>Boll, a legal scholar, discusses all aspects of multiple nationality from the perspective of international law. For 76 countries he provides detailed information:</p> <p>a) on all possible events which lead to attribution/acquisition of nationality and its consequences in respect to other nationalities (whether renunciation is a necessary condition or whether naturalization leads to the loss of other nationalities), and</p> <p>b) on all possible events which lead to withdrawal/loss of nationality.</p> <p>We use three specific information for our coding:</p> <p>A. Whether naturalization requires renunciation of other nationality or leads to the automatic loss of other nationalities</p> <p>B. Whether naturalization elsewhere leads to the loss of nationality in this country</p> <p>C. The qualitative description provided under the heading “general attitude toward multiple nationality”</p> <p>Our categories and classification logic is the following:</p> <p>a) recognized: if A and B = “no” and C provides no strong detrimental information</p> <p>b) tolerated: if A or/and B = “yes” but with major/many exceptions and C indicates de facto tolerance</p> <p>c) not tolerated: if A and B = “yes” and C reveals adverse attitudes</p>	<p>76 (global)</p>	<p>2005/2006</p>	<p>Boll analyzed a broad array of academic sources and information available on the internet.</p>	<p>Boll, A.M (2007): Multiple Nationality and International Law. Leiden/Boston: Martinus Nijhoff Publishers; country information is provided in the appendix, pp. 309-566.</p>
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<b>Patrick Weil</b>	Weil, a legal scholar, provides a comparison of all aspects of citizenship laws for 35 countries. He lists for every country whether those who want to naturalize have to renounce their former citizenship. No detailed information is given. From his list we can directly extract the following classification: a) Renunciation of prior citizenship required b) Renunciation not required.	25 (Western and East European countries)	2000	No information given	Weil, P. (2001): Access to Citizenship: A comparison of Twenty-Five Nationality Laws. In: Aleinikoff, Th. and D. B. Klusmeyer (eds): Citizenship Today: Global Perspectives and Practices. Washington/DC: Brookings Institution Press, pp 17-35 [especially p. 22].
<b>Isabelle Chopin</b>	Chopin, who works for the Migration Policy Group in Brussels, collected information on the actual practices in the acquisition of nationality (not just the de jure situation). She classifies the countries according to the requirement to renounce previous nationality in order to acquire the nationality of this country. Beyond the two basic categories: a) renunciation required b) renunciation not required, she provides detailed information on the exceptions which are made in many countries which formally require renunciation. We try to keep some of this differentiated information in our overview.	15 Older member states of the EU	No explicit information (2004/2005)	Chopin asked NGOs which are active in the migration policy field in every country to fill in a questionnaire about the practices in the acquisition of nationality.	Chopin, Isabelle (2006): Administrative Practice in the Acquisition of nationality, in: Bauböck et al. (ed.): Acquisition and Loss of Nationality. Policies and Trends in 15 European States. Volume 1: Comparative Analyses. Amsterdam: Amsterdam University Press, 221-268 [especially pages: 251-255]
<b>Marc Mojé Howard</b>	Howard, a political scientist, highlights the important difference between "emigrant dual citizenship" and "immigrant dual citizenship". He focuses on "immigrant dual citizenship" as "the much higher standard for a liberal citizenship policy." We transfer his basic classification of countries into two categories: Dual citizenship a) allowed for immigrants b) not allowed for immigrants.	15 Older member states of the EU	2004	Author analyzed the current national citizenship laws.	Howard, Marc M. (2005): Variation in Dual Citizenship Policies in the Countries of the EU, in: IMR Vol. 39, p. 697-720 [especially p. 709].

<p><b>Michael Jones- Cor- rera</b></p>	<p>Jones-Correra, apolitical scientist, presents a table with data on whether Latin American and Caribbean states recognize dual citizenship. We transfer his information into three categories: Dual citizenship a) recognized [J-C: yes] b) recognized with treaty nations [J-C: no + only with treaty nations] c) not recognized.[J.-C: no]</p>	<p>33 Latin Ameri- can and Car-ibbean coun-tries</p>	<p>2000</p>	<p>Jones-Correra consulted sources from migration organizations and contacted embassies and consulates.</p>	<p>Jones-Carrera, M. (2001): Under Two Flags: Dual Nationality in Latin America and its Con-sequences for Naturalization in the United States. In: International Migration Review, 35, 997-1029 [table on p. 999]</p>
<p><b>Jeffrey Staton, Robert Jackson and Damarys Canache</b></p>	<p>The authors, political scientists, classify Latin American countries according to whether they allow for dual national status. Since the context of this study is immigration into the U.S., the results reflect whether emigrants from these countries loose their nationality if they apply for citizenship in the U.S. It is not clear how symmetric the citizenship regulations are and whether immigrants in these countries are treated equally to emigrants. We have two categories: Dual citizenship a) allowed for emigrants b) not allowed for emigrants.</p>	<p>20 (Latin America)</p>	<p>2005</p>	<p>The authors conducted telephone interview with embassies and consulates.</p>	<p>Staton, Jeffrey K., Jackson, Robert and Canache, Damarys, "Costly Citizenship? Dual Nationality Institutions, Naturalization, and Political Connectedness" (June 19,2007). Available at SSRN: <a href="http://ssrn.com/abstract=995569">http://ssrn.com/abstract=995569</a></p>



**Table B: Detailed results of surveys on the acceptance of dual citizenship**

List of investigated Countries	US Office of Personnel Management (2001)	Stanley Renshon (2005)	Tanja Brondsted Sejersen (2008)	Alfred M. Boll (2007)	Patrick Weil (2001)	Isabelle Chopin (2006)	Marc Mojé Howard (2005)	Michael Jones-Correra (2001)	Jeffrey Staton et al. (2007)
<b>189</b>	184 (190 orig.)	144 (151 orig.)	115	76	25	15	15	33	20
<b>geographical orientation</b>	global	global	global	global	Western and East European States	Older member states of the EU	Older member states of the EU	Latin American and Caribbean Countries	Latin America
<b>classification concerning</b>	Dual citizenship recognized/ not recognized	Dual citizenship allowed "in some form" (no information about negative cases)	Dual citizenship allowed/ allowed for citizens from treaty nations/ not allowed	Dual citizenship recognized/ tolerated/ not tolerated (in respect to naturalization)	For naturalization renunciation of prior citizenship required/ not required	For naturalization renunciation of original citizenship required/ not required	Dual citizenship allowed/ not allowed for immigrants	Dual Citizenship recognized/ recognized for citizens from treaty nations/ not recognized	Dual citizenship allowed/ not allowed for emigrants
<b>Afghanistan</b>	not recognized		allowed						
<b>Albania</b>	n.a.	allowed	allowed						
<b>Algeria</b>	not recognized								
<b>Andorra</b>	not recognized								
<b>Angola</b>	not recognized	allowed							
<b>Antigua and Barbuda</b>	recognized	allowed						recognized	
<b>Argentina</b>	not recognized	allowed	allowed with treaty nations	recognized				recognized with treaty nations	not allowed
<b>Armenia</b>	not recognized		allowed						
<b>Australia</b>	recognized	allowed	allowed	recognized	renunciation not required				

<b>Austria</b>	not recognized		not allowed	tolerated (for emigrants)	renunciation required	renunciation required, but some exceptions	not allowed		
<b>Azerbaijan</b>	not recognized		not allowed						
<b>Bahamas</b>	not recognized	allowed	not allowed					not recognized	
<b>Bahrain</b>	not recognized		allowed with treaty nations						
<b>Bangladesh</b>	not recognized	allowed	allowed						
<b>Barbados</b>	recognized	allowed	allowed	recognized				recognized	
<b>Belarus</b>	not recognized	allowed	allowed	tolerated					
<b>Belgium</b>	not recognized	allowed	allowed with treaty nations	not tolerated	renunciation not required	renunciation not required	allowed		
<b>Belize</b>	recognized	allowed	allowed					recognized	
<b>Benin</b>	recognized	allowed							
<b>Bhutan</b>	not recognized		not allowed						
<b>Bolivia</b>	not recognized	allowed	not allowed					not recognized	not allowed
<b>Bosnia and Herzegovina</b>	n.a.		allowed						
<b>Botswana</b>	not recognized	allowed							
<b>Brazil</b>	not recognized	allowed	allowed	recognized				recognized	allowed
<b>Brunei Darussalam</b>	not recognized	allowed	not allowed						
<b>Bulgaria</b>	recognized	allowed	allowed						
<b>Burkina Faso</b>	recognized	allowed							
<b>Burundi</b>	not recognized								
<b>Cambodia</b>	not recognized	allowed	not allowed						
<b>Cameroon</b>	not recognized	allowed							

<b>Canada</b>	recognized	allowed	allowed	recognized	renunciation not required				
<b>Cape Verde</b>	recognized	allowed							
<b>Central African Republic</b>	recognized	allowed							
<b>Chile</b>	not recognized	allowed	allowed with treaty nations	recognized				recognized with treaty nations	not allowed
<b>China</b>	not recognized		not allowed	not tolerated					
<b>Colombia</b>	recognized	allowed	allowed	recognized				recognized	allowed
<b>Congo (formerly Zaire)</b>	not recognized	allowed							
<b>Congo, Democratic Republic of the</b>	not recognized								
<b>Cook Islands</b>				recognized					
<b>Costa Rica</b>	recognized	allowed	allowed	recognized				recognized	allowed
<b>Côte d'Ivoire (formerly Ivory Coast)</b>	recognized	allowed		tolerated					
<b>Croatia</b>	not recognized	allowed	not allowed						
<b>Cuba</b>	not recognized							not recognized	not allowed
<b>Cyprus</b>	recognized	allowed	allowed	tolerated					
<b>Czech Republic</b>	not recognized		not allowed	tolerated					
<b>Denmark</b>	not recognized	allowed	not allowed		renunciation not required	renunciation required, rather strict enforce- ment	not allowed		
<b>Djibouti</b>	not recognized								
<b>Dominica</b>	n.a.	allowed						recognized	

<b>Dominican Republic</b>	not recognized	allowed						recognized	allowed
<b>Ecuador</b>	not recognized	allowed	allowed	recognized				recognized	allowed
<b>Egypt</b>	not recognized	allowed	allowed	recognized					
<b>El Salvador</b>	recognized	allowed	allowed					recognized	allowed
<b>Equatorial Guinea</b>	not recognized								
<b>Eritrea</b>	not recognized	allowed							
<b>Estonia</b>	not recognized		not allowed		renunciation not required				
<b>Fiji</b>	not recognized	allowed	not allowed	not tolerated					
<b>Finland</b>	not recognized	allowed	allowed	recognized	renunciation not required	renunciation not required	allowed		
<b>France</b>	recognized	allowed	allowed	recognized	renunciation not required	renunciation not required	allowed		
<b>Gabon</b>	not recognized								
<b>Gambia</b>	not recognized	allowed							
<b>Georgia</b>	n.a.		not allowed						
<b>Germany</b>	not recognized	allowed	not allowed	tolerated	renunciation required	renunciation required, but many exceptions	not allowed		
<b>Ghana</b>	not recognized	allowed		recognized					
<b>Greece</b>	not recognized	allowed	allowed	recognized	renunciation not required	renunciation not required	allowed		
<b>Grenada</b>	recognized	allowed	allowed					not recognized	
<b>Guatemala</b>	not recognized	allowed	not allowed	tolerated				recognized with treaty nations	not allowed
<b>Guinea</b>	not recognized								

<b>Guinea-Bissau</b>	not recognized	allowed	not allowed						
<b>Guyana</b>	not recognized	allowed						not recognized	
<b>Haiti</b>	not recognized	allowed						not recognized	not allowed
<b>Honduras</b>	recognized	allowed	allowed					recognized with treaty nations	not allowed
<b>Hong Kong</b>				tolerated					
<b>Hungary</b>	recognized	allowed	allowed	recognized					
<b>Iceland</b>	not recognized	allowed	allowed	recognized					
<b>India</b>	not recognized	allowed	allowed	not tolerated					
<b>Indonesia</b>	not recognized		not allowed	not tolerated					
<b>Iran</b>	not recognized	allowed	not allowed	recognized					
<b>Iraq</b>	n.a.	allowed							
<b>Ireland</b>	recognized	allowed	allowed	recognized	renunciation not required	renunciation not required	allowed		
<b>Israel</b>	recognized	allowed	allowed	tolerated	renunciation required				
<b>Italy</b>	recognized	allowed	allowed	recognized	renunciation not required	renunciation not required	allowed		
<b>Jamaica</b>	recognized	allowed	allowed	recognized				recognized	allowed
<b>Japan</b>	not recognized	allowed	not allowed	not tolerated					
<b>Jordan</b>	recognized	allowed	allowed						
<b>Kazakhstan</b>	not recognized		not allowed						
<b>Kenya</b>	not recognized			not tolerated					
<b>Kiribati</b>	not recognized								
<b>Kuwait</b>	not recognized		allowed with treaty nations						
<b>Kyrgyzstan</b>	not recognized		not allowed						

<b>Lao People's Democratic Republic</b>	not recognized		not allowed						
<b>Latvia</b>	not recognized	allowed	allowed	not tolerated	renunciation not required				
<b>Lebanon</b>	recognized	allowed	allowed						
<b>Lesotho</b>	not recognized	allowed							
<b>Liberia</b>	not recognized	allowed							
<b>Libyan Arab Jamahiriya</b>	not recognized								
<b>Liechtenstein</b>		allowed							
<b>Lithuania</b>	not recognized	allowed	allowed		renunciation required				
<b>Luxembourg</b>	not recognized	allowed	not allowed	tolerated	renunciation required	renunciation required	not allowed		
<b>Macedonia</b>		allowed	not allowed						
<b>Madagascar</b>	not recognized	allowed							
<b>Malawi</b>	not recognized	allowed							
<b>Malaysia</b>	not recognized		not allowed	tolerated (discretionary)					
<b>Maldives</b>	recognized	allowed							
<b>Mali</b>	recognized	allowed							
<b>Malta</b>	not recognized	allowed	allowed						
<b>Marshall Islands</b>	not recognized								
<b>Mauritania</b>	not recognized	allowed							
<b>Mauritius</b>	recognized	allowed							
<b>Mexico</b>	recognized	allowed	allowed	tolerated	renunciation required			recognized	allowed

<b>Micronesia, Federated States of</b>	not recognized								
<b>Moldova</b>	not recognized	allowed	allowed						
<b>Monaco</b>	not recognized								
<b>Mongolia</b>	not recognized		not allowed						
<b>Morocco</b>	recognized	allowed		recognized					
<b>Mozambique</b>	not recognized	allowed							
<b>Myanmar</b>	not recognized	allowed	not allowed						
<b>Namibia</b>	not recognized	allowed							
<b>Nauru</b>	not recognized								
<b>Nepal</b>	not recognized	allowed	not allowed						
<b>Netherlands</b>	not recognized	allowed	allowed with treaty nations	tolerated	renunciation not required	renunciation required, but many exceptions	allowed		
<b>New Zealand</b>	recognized	allowed	allowed	recognized					
<b>Nicaragua</b>	not recognized	allowed	allowed with treaty nations					recognized with treaty nations	allowed
<b>Niger</b>	not recognized	allowed							
<b>Nigeria</b>	recognized	allowed		recognized					
<b>North Korea</b>	not recognized	allowed	not allowed						
<b>Norway</b>	not recognized		allowed with treaty nations	not tolerated					
<b>Oman</b>	not recognized	allowed	not allowed						
<b>Pakistan</b>	not recognized	allowed	allowed with treaty nations						
<b>Palau</b>	not recognized	allowed							
<b>Panama</b>	not recognized	allowed	allowed					recognized	allowed
<b>Papua New</b>	not recognized	allowed	not allowed						

<b>Guinea</b>									
<b>Paraguay</b>	recognized	allowed	allowed with treaty nations	recognized				recognized with treaty nations	
<b>Peru</b>	recognized	allowed	allowed	tolerated				recognized	allowed
<b>Philippines</b>	not recognized	allowed	allowed	tolerated					
<b>Poland</b>	not recognized	allowed	not allowed	recognized for emigrants					
<b>Portugal</b>	recognized	allowed	allowed	recognized	renunciation not required	renunciation not required	allowed		
<b>Qatar</b>	not recognized	allowed	not allowed						
<b>Romania</b>	recognized	allowed	allowed	recognized					
<b>Russian Federation</b>	recognized	allowed	allowed	tolerated	renunciation not required				
<b>Rwanda</b>	not recognized	allowed							
<b>Saint Kitts (Saint Christopher) and Nevis</b>	recognized	allowed						recognized	
<b>Saint Lucia</b>	recognized	allowed						recognized	
<b>Saint Vincent</b>	recognized	allowed						recognized	
<b>Samoa</b>	not recognized	allowed	allowed	recognized					
<b>Sao Tome and Principe</b>	not recognized								
<b>Saudi Arabia</b>	not recognized		allowed with treaty nations						
<b>Senegal</b>	not recognized	allowed							
<b>Serbia</b>	n.a.	allowed							
<b>Seychelles</b>	not recognized								
<b>Sierra Leone</b>	not recognized	allowed							
<b>Singapore</b>	not recognized	allowed	not allowed	tolerated					



<b>Slovak Republic</b>	recognized	allowed	allowed						
<b>Slovenia</b>	not recognized	allowed	allowed	tolerated					
<b>Solomon Islands</b>	not recognized								
<b>South Africa</b>	recognized	allowed	allowed	tolerated	renunciation not required				
<b>South Korea</b>	not recognized	allowed	not allowed	not tolerated					
<b>Spain</b>	not recognized	allowed	allowed with treaty nations	tolerated	renunciation not required	renunciation not required	not allowed		
<b>Sri Lanka</b>	not recognized	allowed	allowed						
<b>Sudan</b>	not recognized	allowed							
<b>Suriname</b>	n.a.		not allowed					not recognized	
<b>Swaziland</b>	not recognized	allowed							
<b>Sweden</b>	not recognized	allowed	allowed	recognized	renunciation not required	renunciation not required	allowed		
<b>Switzerland</b>	recognized	allowed	allowed	recognized					
<b>Syria</b>	recognized	allowed	allowed with treaty nations	recognized					
<b>Taiwan</b>	not recognized	allowed		recognized					
<b>Tajikistan</b>	n.a.		allowed with treaty nations						
<b>Tanzania</b>	not recognized	allowed							
<b>Thailand</b>	not recognized	allowed	not allowed	tolerated					
<b>East-Timor</b>			not allowed	recognized					
<b>Togo</b>	recognized	allowed							
<b>Tonga</b>	not recognized	allowed		tolerated					
<b>Trinidad and Tobago</b>	recognized	allowed	allowed	recognized				recognized	allowed
<b>Tunisia</b>	recognized	allowed							
<b>Turkey</b>	recognized	allowed	allowed	recognized					

<b>Turkmenistan</b>	n.a.		not allowed						
<b>Tuvalu</b>	recognized	allowed		tolerated					
<b>Uganda</b>	not recognized	allowed							
<b>Ukraine</b>	not recognized	allowed	not allowed						
<b>United Arab Emirates</b>	not recognized	allowed	allowed with treaty nations						
<b>United Kingdom</b>	recognized	allowed	allowed	recognized	renunciation not required	renunciation not required	allowed		
<b>United States of America</b>	recognized	allowed	allowed	recognized	renunciation required				
<b>Uruguay</b>	recognized	allowed	allowed	tolerated				recognized	
<b>Uzbekistan</b>	not recognized	allowed	not allowed						
<b>Vanuatu</b>	not recognized	allowed		not tolerated					
<b>Venezuela</b>	not recognized	allowed	not allowed	recognized				not recognized	not allowed
<b>Vietnam</b>	not recognized	allowed	not allowed						
<b>Yemen</b>	not recognized	allowed							
<b>Zambia</b>	not recognized	allowed							
<b>Zimbabwe</b>	not recognized	allowed		not tolerated					

**Note:**

empty cell = country not included in study; n.a. = country included but no information available

definition of colored coding:

1	countries with no acceptance of dual citizenship
2	countries with a very limited acceptance of dual citizenship
3	countries with inconsistent results
4	countries which accept dual citizenship with treaty nations or tolerate dual citizenship de facto
5	countries with full acceptance of dual citizenship