

Chapter 3

The Toleration of Dual Citizenship: A Global Trend and its Limits

Rainer Bauböck, European University Institute, Florence/
Austrian Academy of Sciences, Vienna

Abstract

This chapter summarises the causes of the strong global trend towards the toleration of dual citizenship but then focuses on its possible limits and reasons for resistance by some states. I consider specifically why the two largest states in terms of population – China and India – adhere to a policy of strict non-toleration of multiple citizenship out of security concerns and adversarial ideologies of national sovereignty. I also examine the Eastern European context where policies of regional hegemony (by Russia) and the mobilisation of ethnic kin minorities in the near abroad for buttressing the domestic hegemony of political incumbents (by Hungary) have triggered counter-reactions against dual citizenship in neighbouring states. In so-called Western democracies, security concerns about terrorism have not led to a retreat from dual citizenship but have turned a second citizenship into a potential liability, as the possession of it allows states to denationalise citizens whom they consider to be a threat. Finally, the chapter considers whether demand and supply for dual citizenship might shrink if the hyperglobalisation since the 1990s were partly reversed in response to pandemics and the climate crisis.

1. Introduction

There is a global trend towards a growing toleration of dual citizenship. This is a well-established fact. The multiple causes for this trend are also well-known and acknowledged in the scholarly literature. Less attention has thus far been paid to the limitations of this trend. This chapter considers, first, the particular national and regional contexts that help to understand why some countries have resisted the trend. Second, a wave of recent anti-terrorism legislation permits states to revoke citizenship as long as they avoid rendering stateless those thus deprived, which raises new questions about the unequal treatment of mono- and multiple citizens and the potential risks of multiple citizenship for individuals. Finally, there is a question that has barely been discussed thus far. How will the increasing instrumental uses of citizenship by individuals as well as states affect the future of citizenship as a bond between individuals and states and as membership in a self-governing political community?

Before examining these limits, this chapter first discusses how dual citizenship is generated and how its occurrence may be constrained by nationality laws (Section 2). It

then provides a survey of global patterns and trends and summarises current knowledge about their drivers (Section 3). The rest of the chapter focuses on three types of limitation. The first of these concerns contextual deviation from the trend (Section 4) and the second, recent policies of citizenship revocation targeting multiple citizens (Section 5). In a more speculative vein, the final section considers whether a proliferation of multiple citizenships might undermine its value for individuals and states and whether a strong reduction of global mobility triggered by pandemics and the climate crisis might impact negatively on the demand for and supply of dual citizenship (Section 6).

As the argument in Sections 5 and 6 partly articulates a normative critique of citizenship policies, I need to clarify upfront the perspective from which this critique emerges. Most objections against dual citizenship in the past have been framed by a state-sovereignty perspective. The main concern was that states lose control over their citizens if these latter can be simultaneously nationals of another state, just as they would lose control over their territory if another state were to exercise coercive powers within their jurisdiction. As the analysis in Section 2 will show, this objection has not merely become anachronistic but is fraught by an inherent contradiction between a principle of national self-determination of citizenship by each state on the one hand and, on the other, international efforts to ensure that everybody has only one citizenship. A diametrically opposed critique has recently been proposed by cosmopolitan political theorists who are concerned that multiple citizenship contributes to global inequality by giving dual citizens more votes in national elections (Goodin and Tanasoca 2014) or by offering additional mobility rights to wealthy elites (Tanasoca 2018).¹ By contrast, my normative perspective starts from the internal value of citizenship as a status of equal membership in a bounded political community and its external value for assigning special responsibilities for the protection of individual rights in the international order.² This citizenship perspective supports a robust toleration of multiple citizenship for international migrants while, at the same time, revealing limits in terms both of who can claim access to several citizenships and of tipping points when proliferation undermines the value of citizenship itself.

2. How to become a dual citizen

An important fact that is often misunderstood is that dual citizenship is always the outcome of an interaction between national legal rules for the attribution of citizenship.

¹ For a critical discussion see Bauböck et al. (2019).

² Joachim Blatter has proposed an additional value of dual citizenship for democracy: it provides transnational input into domestic deliberations and often does so through politically empowering migrants whose countries of origin have been subjected to asymmetric power exercised by receiving states (Blatter 2011).

Each of the states concerned awards its citizenship to the same person but they do so independently of each other, generally at different points in time³ and according to their own national laws. In this sense, no state can grant dual citizenship. Instead, there is a range of attitudes that “tolerant” states can take towards the other state(s) involved. At one end of the spectrum, the toleration of dual citizenship means that each state considers the person only as its own citizen and simply ignores that another state regards her or him in the same way. This attitude of turning a blind eye to second or third nationalities held by their citizens is typical for powerful and wealthy democracies, such as the US, Britain or France. At the other end, some countries recognise dual citizenship by explicitly permitting and/or regulating it through bilateral or multilateral treaties. A typical example are the treaties which Spain has concluded with most Latin American states that exempt these countries’ nationals from the general rejection of multiple nationality in Spanish law while, at the same time, stipulating that the external second citizenship will be regarded as inactive (“dormant”) when citizens reside in one of the two states concerned (Marín et al. 2015; Vonk 2012). In between these two poles, states can adopt various degrees of toleration or recognition of dual citizenship.

Similarly, negative attitudes of states towards dual citizenship can be articulated across a spectrum of different responses. Because dual citizenship is always co-produced by two independent states, it is generally not within the power of any single state to effectively prohibit all forms of dual citizenship, since it cannot force other states to adopt those rules that would guarantee a singular citizenship outcome in all cases. In many instances, states cannot even rely on all other states to provide information about whether their citizens also carry other passports. As we will see, major constraints on fighting dual citizenship are also created by international legal norms that states have subscribed to by ratifying international human-rights conventions.

Because each state controls only its own side of the dual citizenship equation, all it can do is threaten to withhold the granting of its citizenship or to revoke an existing citizenship in cases where it knows that the person also holds – or is about to acquire – another nationality and is not willing or able to give it up. Most states find such blanket prohibition difficult to enforce across the many different ways in which they attribute their citizenship. We therefore need to distinguish between the different modes of citizenship acquisition – both at and after birth – in order to capture the variations in (non-) toleration across states.

Finally, hostile attitudes to dual citizenship are articulated not only through regulating access to the status but also through restrictions on the exercise of citizenship rights. Traditionally, international lawyers have assumed that there is one specific right that mono-citizens enjoy but dual citizens lose: states cannot offer diplomatic protection to their citizens against violations of their rights by another state if these persons are also

³ The exception is when dual citizenship results from states’ rules on acquisition at birth.

citizens of that state.⁴ Yet state practice has not always followed this rule, grounded in the doctrine of non-interference in the internal affairs of other countries. Countries like the US, France and Britain, in particular, which tend to tolerate dual citizenship through ignoring second citizenships, have extended their protection to dual citizens when these run into trouble in their second countries. It has become questionable whether state practice still backs an international legal norm against diplomatic protection in such cases. Moreover, international courts have started to recognise exceptions in cases of human-rights violations or when the citizenship of the state exercising diplomatic protection is considered the person's effective nationality (e.g. because it matches the person's habitual residence (Hailbronner 2003, 22–25)).⁵

Other restrictions targeting multiple citizens concern their domestic rights and express reservations about their loyalty. The most common one is exclusion from high public office, such as that of a Member of Parliament. Australia has been fully tolerant of dual citizenship status for some time but its constitution prohibits “subjects or citizens of a foreign power” to sit in the federal parliament. As a result, five MPs, some of whom had not even been aware that they held a second citizenship, attributed to them at birth, lost their seats in 2017.⁶ In 2010 the European Court of Human Rights rejected a similar prohibition in Moldova but clarified that it was permissible to have such restrictions for dual citizens as long as these are not introduced by partisan legislation aimed at excluding political opponents – which had been the case in Moldova.⁷ Even more comprehensive restrictions of access to public office are common for naturalised citizens in Latin American states. Since most of these countries tolerate dual citizenship, these curtailments of political rights mostly affect dual citizens by naturalisation, turning them into second-class citizens. Many countries have, however, adopted a rather more relaxed attitude. For example, in Switzerland, jobs in the secret service or law enforcement are still reserved for mono-citizens; otherwise, there is a clear trend towards the toleration of dual citizenship – also in sensitive security-related positions such as border guards (Blatter, Sochin D’Elia and Buess 2018).

Dual citizenship emerges through the interaction of state rules for the automatic attribution of citizenship by birth and those for an individual change of citizenship after birth. For birthright citizenship, there are two combinations of rules that will result in dual citizenship while, for naturalisation, there is only one (Sejersen 2008).

⁴ See the Convention on Certain Questions Relating to the Conflict of Nationality Laws (The Hague 1930), Art. 4: “A State may not afford diplomatic protection to one of its nationals against a State whose nationality such person also possesses”.

⁵ Note that this norm does not prevent states from offering consular protection and services to their dual citizens since these do not involve taking action against the host state.

⁶ See <http://globalcit.eu/australian-high-court-rules-that-dual-citizens-are-ineligible-to-sit-in-parliament/> (accessed 08 December 2020).

⁷ *Tanase v. Moldova*, Application No. 7/08, European Court of Human Rights, 27 April 2010.

2.1 Dual citizenship by descent

If a child is born to a mother with citizenship of state A and a father who is a citizen of state B, the child will be born as a dual citizen of A and B if both countries attribute citizenship by descent (*ius sanguinis*). Dual citizenship can be avoided only if states discriminate on grounds of gender. Until the 1970s, even Western democracies (including Austria) did so by passing their citizenship on to the next generation only from the father's side. A second common rule was that, upon marriage, a female spouse automatically acquired her husband's citizenship and lost her original one, in which case children born to a married couple with different national origins again only acquired the father's original citizenship. A third rule that reduced cases of dual citizenship by descent, which was present in Austria until 2013, is that children born out of wedlock acquire only their mother's but not their father's citizenship. International conventions and international as well as domestic courts have struck down all three rules on grounds of gender discrimination. They have thus been phased out in most liberal democracies but can still be found in a significant number of states in Africa, the Middle East and Asia.

2.2 Dual citizenship by territorial birth of immigrant origin

If state A attributes citizenship to children born on its territory (*ius soli*) and state B attributes citizenship to children born to citizen parent(s) outside its territory (extraterritorial *ius sanguinis*), then the second generation of emigrant origin from country B born in country A will be dual citizens by birth. The numbers of dual citizens through *ius soli* in immigration countries can be reduced by the country of birth if *ius soli* is made conditional – e.g. by requiring that a parent have a certain residence permit or length of residence in the country or that the child will acquire citizenship only after having lived in the country for several years. A few countries, among them Germany, have also made *ius soli* provisional by requiring that the child choose one of the two citizenships when he or she reaches the age of majority. In 2014, Germany relaxed this “option duty” considerably by exempting children who have lived in Germany for eight years, have attended school there for six years or have completed their school education or vocational training there (Faharat and Hailbronner 2020; Spiro 2016).

The acquisition of dual citizenship by territorial birth can also be prevented or constrained through certain provisions in the laws of countries of origin. State B can fully prevent dual citizenship if it applies extraterritorial *ius sanguinis* only to those children who do not acquire another citizenship at birth. This rule has been adopted by the two largest states in terms of population – China and India – whose policies are further discussed in Section 3. Alternatively, state B can accept dual citizenship at birth but apply an expiry date on it by requiring that children born abroad to citizen parents must return before a certain age (usually between 18 and 23) or otherwise establish a close connection to their parents' country of origin in order to retain the citizenship of state

B. This rule is applied in European Nordic states. A third possibility is that state B can let the first generation born abroad retain citizenship for life but suspend extraterritorial *ius sanguinis* for the subsequent generation – i.e. those whose parent(s) had already been born abroad – a rule adopted, for example, by Canada. Finally, state B can (as Austria does) withdraw its citizenship if a person voluntarily acquires another citizenship after birth. Emigrants from state B who become citizens of state A by naturalisation will then lose their citizenship of origin and can no longer pass it on to their children born in state A.

2.3 Dual citizenship by naturalisation

Dual citizenship emerges from naturalisation only if state B does not withdraw its citizenship if its citizen acquires the nationality of state A through naturalisation *and* if state A does not require renunciation of or release from citizenship of state B as a condition for naturalisation. We can call the first part of this combination the toleration of dual citizenship in outgoing naturalisation (by state B) and the second part toleration in incoming naturalisation (by state A). Dual citizenship is the outcome only if both states play their respective parts in this game of toleration. This does not mean, however, that dual citizenship will emerge only if both states tolerate dual citizenship in incoming *as well as* outgoing naturalisations. As we will see in Section 3, a significant number of states engage in asymmetric toleration. If there is one-way migration from state B to state A and state B tolerates dual citizenship only in outgoing naturalisations while state A tolerates it only in incoming ones, then these migrants still have the opportunity to become dual citizens, although those migrating in the opposite direction – from A to B – can only change their citizenship if they are willing to give up their previous one.

Past efforts by international lawyers to curb dual citizenship have focused on asking states to withdraw their citizenship in outgoing naturalisations. This principle was enshrined in Chapter 1 of the 1963 Strasbourg Convention on the Reduction of Cases of Multiple Nationality and on Military Obligations in Cases of Multiple Nationality. This convention does not ask states to introduce the renunciation of a previous citizenship as a condition for naturalisation but expects states adhering to the convention to withdraw their citizenship if a person voluntarily acquires the citizenship of another contracting state – an effort which has been spectacularly unsuccessful. As of 2020, all member states of the convention, apart from Austria and the Netherlands, have either left the convention altogether or have denounced their obligations under Chapter 1.

Loopholes for the exceptional toleration of dual citizenship exist in both incoming and outgoing naturalisations. Many states that generally require the renunciation of a previous citizenship drop this request where it is impossible to fulfill because the country of origin adheres to a doctrine of perpetual allegiance and refuses to release its citizens. Austria, Germany and the Netherlands all accept dual citizenship in this case, which creates a strange inequality of treatment between applicants for naturalisation from, for example, the Arab states or Iran – where renunciation is impossible – and those from

most other states of origin that do allow it for their emigrants. A similar reason for special toleration applies also to refugees who cannot be expected to request and receive release from a state of origin that has persecuted them or denied them protection. A different and very common reason for exceptions is where incoming naturalisations are considered to be in the interest of the state. Many states (among them Austria) waive renunciation requirements for fast-track naturalisation on the grounds of special achievements in sports, culture or science, cultural affinity with the majority population and investment or the restitution of citizenship for the victims of non-democratic regimes in the country's history. Finally, some countries, such as the Netherlands, also exempt foreign spouses or partners of national citizens, who are generally a large group among naturalisation applicants.

Exceptions are equally common in outgoing naturalisations. Austria and many other countries allow expatriates (on the basis of a highly discretionary decision in the Austrian case) to retain their citizenship of origin if they can demonstrate that they are going to maintain close ties to the country or that they would suffer serious disadvantages unless they acquire the citizenship of their host country. Secondly, the now-obsolete norm that countries should denationalise their expats if these acquire a foreign nationality applied only to voluntary acquisitions but not to automatic ones. Automatic naturalisations have become rare although they were quite common the past, especially in the case of marriage to a citizen. Until 2008, Austria had a peculiar rule that full university professors automatically acquired Austrian citizenship when taking up their chairs, without having to renounce their previous nationality.

3. Global and regional trends and patterns

Although [GLOBALCIT](#) provides a wealth of data on nationality laws, it is impossible to take into account all the degrees and nuances of dual-citizenship toleration explained in the previous section in a global comparison. Only the ground rules can be covered when classifying national laws as either tolerant or intolerant. However, it is crucial not to mix up the three different pathways in such a coding exercise, as is frequently done in comparative literature that considers only renunciation requirements in incoming naturalisations (Howard 2009; Janoski 2010; MIPEX 2015).

There has been, until now, no longitudinal global dataset on the toleration of dual citizenship acquired through the two birthright combinations or through incoming naturalisation.⁸ Maarten Vink and his colleagues have, however, compiled the MACIMIDE

⁸ Sejersen's (2008) pioneering effort was based on longitudinal data which also included the toleration of birthright dual citizenship and incoming naturalisations but the dataset has not been published and seems to contain some gaps, inaccuracies in the data and occasional misinterpretations of legal provisions. The [GLOBALCIT](#) dataset may still contain some errors

Global Expatriate Dual Citizenship Dataset, which shows a strong and steady increase of toleration in outgoing naturalisations from a low point of 35 per cent of states existing in 1962 to 76 per cent of all states in 2020 (Vink, de Groot and Chun Luk 2020). The latter number is composed of states that tolerate dual citizenship while also allowing for voluntary renunciation and those whose acceptance of dual citizenship among expatriates results from a doctrine of perpetual allegiance. If we distinguish between these subcategories, we find that the share of states where citizenship is automatically lost through outgoing naturalisation has decreased sharply from 65 per cent in 1962 to 23 per cent in 2020. The percentage of countries where retaining a citizenship of origin is compulsory has increased only slightly from 7 to 10 per cent – in contrast to the numbers of states where retaining or renouncing a citizenship of origin is an individual choice, which has risen steeply from 28 to 67 per cent.⁹ The rise in dual citizenship toleration by countries of origin is thus not so much due to authoritarian policies of control over their diasporas as to a liberalisation of their citizenship policies.

Grouping countries by world regions shows that the general upward trend towards greater toleration is the same in all world regions whereas the speed of change is different: while Europe as a whole follows the global average, toleration in the Americas and Oceania has risen faster and lags somewhat behind in Africa and Asia. In 2019, 91 per cent of all states in North, Central and South America accepted dual citizenship for their expatriates, whereas only 65 per cent of Asian states did so (Vink et al. 2019). Reversals of liberalising reforms are very exceptional for both outgoing and incoming naturalisations. The Netherlands is a rare case where a renunciation requirement in naturalisations was suspended (in 1991) but reinstated in 1997 and tightened in 2010, as a result of the rejection of multicultural integration policies in favour of mandatory civic integration (Spiro 2016; van Oers, de Hart and Groenendijk 2013).

Vink and his collaborators tested several hypotheses about what made countries switch from the non-toleration to the toleration of dual citizenship in outgoing naturalisations (Vink et al. 2019). They found a regional diffusion effect – countries are more likely to adopt toleration if their neighbours have done so before. Secondly, they found a

of this kind but the involvement of country experts in collecting the data reduces these risks. Harpaz (2019) compiled a global dataset on dual citizenship toleration in incoming and outgoing naturalisations for two years (1990 and 2016) and a limited number of countries (76 and 88 respectively). See also Harpaz's [Chapter 5](#) in this book.

⁹ Data for 2020, and our own calculation from the MACIMIDE Global Expatriate Dual Citizenship Dataset (Vink, de Groot and Chun Luk 2020). The dataset provides information on expat dual citizenship for 195 states in 2020. When interpreting these data, one needs to bear in mind that the number of independent states has greatly increased since the 1960s due to decolonisation and the break-up of socialist federations in Eastern Europe after 1989. The increase is thus due not only to policy changes but also to new states adopting a policy of dual citizenship toleration from the start.

positive correlation with migrant remittances, which is in line with a common hypothesis that migrant sending countries have changed attitudes – from considering their emigrants as traitors or lost populations to regarding them as an asset (Bauböck 2003). The third significant correlation is with the granting of voting rights to non-resident citizens. This suggests that the change of attitudes towards diasporas may not only be brought about by governments trying to use them as an economic and political resource (Gamlen 2019) but also by diaspora organisations campaigning for dual-citizenship toleration and using their electoral power for this goal. No significant differences with regards to the policy change emerge, however, between democratic and non-democratic regimes.

Although we do not yet have time-series data for the other pathways to dual citizenship covering longer periods, their distribution across countries in the present is known. Table 3.1 shows the combination of toleration in incoming and outgoing naturalisations for a global set of 175 states in 2018. Countries have been coded cautiously in such a way that those which accept dual citizenship in many cases but not by default (as, for example, Germany and the Netherlands) are considered non-tolerant. Nearly half (47 per cent) of all countries fully tolerate dual citizenship by naturalisation, while only 18 per cent (among them Austria) remain in the group that rejects dual citizenship for both immigrants and emigrants. Table 3.1 also reveals that countries which accept dual citizenship asymmetrically are more often favourably biased towards their expatriates (19 per cent) than towards their immigrants (15 per cent).

Table 3.1. Dual citizenship in incoming and outgoing naturalisations in 2016

		In outgoing naturalisation					
		No		Yes		Total	
		No.	%	No.	%	No.	%
In incoming naturalisation	No	32	18	33	19	65	37
	Yes	27	15	83	47	110	63
	Total	59	33	116	66	175	100

Source: GLOBALCIT, own calculations

Maps designed by the IOM's Global Migration Data Analysis Centre from the [GLOBALCIT](#) dataset show the regional distribution of these four types of (non-)toleration of dual citizenship through naturalisation (IOM 2019). In the Americas, Chile, Mexico and a majority of Central American states are the exceptions that tolerate dual citizenship for emigrants but not for immigrants, whereas all other states embrace symmetric toleration. South and East Asia (from Pakistan to Japan) provide the strongest contrast, with a clear prevalence of symmetric non-toleration of dual citizenship. Africa is predominantly tolerant in both ways but with significant exceptions. Europe is the continent that presents the most mixed picture. In Western Europe, only the Netherlands, Germany, Spain and

Austria still cling to general non-toleration. However, in the former three countries, the renunciation requirement is waived in the majority of naturalisations, which is not the case in Austria. Among former socialist states, the Baltic countries and Ukraine also fall into this category, whereas the traditional emigration countries of the Balkans accept dual citizenship in outgoing but not in incoming naturalisation.

For the EU states we also have data on the restriction of dual citizenship acquired by birth. These are rare in Europe, mainly because international and European human-rights law has banned the gender discrimination which, in the past, had secured the attribution of only paternal citizenship at birth. We find only four EU member states where dual citizenship is constrained not only in incoming and outgoing naturalisations but also when acquired at birth (Honohan and Erdilmen 2020). Germany is the only case where dual citizenship acquired *iure solis* is provisional. As already explained above, children who have obtained German citizenship through territorial birth must choose between their German and an inherited foreign citizenship before the age of 23 but only if they have not spent much of their childhood in the country. However, Germany fully tolerates dual citizenship involving the nationality of another EU member state. Latvia applies an option duty to children who have acquired two citizenships *iure sanguinis* both for domestic and extraterritorial births but again exempts EU nationalities as well as EFTA and NATO member states, Australia, Brazil and New Zealand from this condition (for birthright and naturalisation).¹⁰ Slovenia and Croatia try to prevent dual citizenship acquisition only for extraterritorial births, requiring in this case that both parents be citizens, which still permits dual citizenship through a combination of extraterritorial *ius sanguinis* with *ius soli*.

The strength of the trend towards the toleration of dual citizenship is impressively demonstrated in a recent report by Luuk van der Baaren (2020) who finds that a majority of 16 EU member states applied none of the possible restrictions on dual citizenship in 2018 that I have discussed in this section. Since holding dual citizenship is only possible if both of the countries involved tolerate it, we must consider dyadic combinations of EU member states to find out how often mobile EU citizens can actually become dual citizens. Van der Baaren has calculated that, out of 756 possible dyadic citizenship constellations between EU member states, 461 (61 per cent) involve the full toleration of

¹⁰ The principle of non-discrimination between citizens by birth and by naturalisation articulated in Article 5(2) of the European Convention on Nationality is more often violated by discriminating against naturalised (dual) citizens but the German and Latvian option duties show that restrictions can also target citizens by birth whose citizenship is conditional. It is true that the two countries do not generally tolerate dual citizenship in incoming naturalisations, so the option duty for birthright citizens may be argued to be in line with a general policy of preventing dual citizenship. However, as the German legislator realised in 2014, there is a major difference between conditions for the acquisition of citizenship and threatening those who have lived in the country for most of their lives with the revoking of their citizenship unless they renounce another one that they have inherited.

dual citizenship by both countries. Factoring in the number of naturalisations in the same year, he concludes that 92 per cent of EU citizens acquiring the nationality of another EU member state in 2018 could legally retain their original citizenship because they were situated in a constellation where dual citizenship is fully tolerated. This very high number may be explained by the fact that EU citizens enjoy strong protection of their rights in other member states and are mostly unwilling to give up their citizenship of origin. As voting rights at the national level remain strongly tied to national citizenship, the non-toleration of dual citizenship creates a major obstacle to the full political integration of mobile EU citizens.

4. Deviant patterns of dual-citizenship promotion and restriction

Summarising findings in the literature (Hammar 1990; Sejersen 2008; Spiro 2016), we can identify the following main drivers of the global trend towards dual-citizenship toleration: (1) the declining number of international wars after World War II, which reduced fears about the disloyalty of dual citizens and conflicts over military conscription; (2) the prohibition of gender discrimination in nationality law that was pivoted by the 1979 Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW); (3) the change in states' attitudes towards their expatriates and diasporas that has greatly strengthened the extraterritorial dimension of citizenship; and (4) the transformation, especially of European countries, through large-scale immigration. Immigration diminished the historic difference between European emigrant nations and American immigrant nations, making the former more open towards accepting dual citizenship for first-generation immigrants and second generations born on their territory.

Each of these causal mechanisms was reinforced through the – mostly regional – diffusion of legal standards and policies, with states imitating their neighbours and other member states in regional unions. However, even a global policy trend does not allow firm predictions about future developments. On the one hand, a slightly flattening curve of dual-citizenship toleration in outgoing naturalisations since 2005 (Vink et al. 2019) suggests the possibility that the trend may soon reach saturation point. This would mean that states that have thus far not changed their laws towards toleration may be resilient because of contextual reasons that are stronger than the causes underlying the global trend. A second possibility is a reversal of the trend itself in a scenario of deglobalisation, which I consider in Section 6. I now briefly present four cases illustrating the different contexts in which opposition to dual citizenship has hardened.

As mentioned in Section 2, China and India are among the most restrictive states since they attempt to fully prevent dual citizenship at birth as well as in naturalisations. They are also the largest countries on earth and their resistance blocks access to dual citizenship for more than one third of the world's population. It is thus worth considering the reasons for their exceptionally tough stance. In the People's Republic of China

(PRC) the policy can be traced back to the Cold War era, when the PRC abandoned the principle of perpetual allegiance by allowing for voluntary renunciation among Chinese emigrants and adopting a single nationality principle. Following the model set by socialist states in Europe, the main instrument with which to achieve this goal was a series of bilateral treaties with other states to prevent dual nationality. As this proved a largely unsuccessful approach, a new nationality act of 1980 stated the general principle that “[t]he People’s Republic of China does not recognize dual nationality for any Chinese national” and introduced the automatic loss of Chinese citizenship in the case of the acquisition of a foreign nationality by naturalisation (Low 2016, 7). The rise of China’s wealth and global power has created strong demands for dual citizenship among the Chinese diaspora and the PRC has become interested in the return migration of highly skilled and high-income people of Chinese origin. Choo Chin Low reports on attempts by Chinese expats to lobby the authorities in a bid to persuade them to change their policies or to introduce a Chinese Overseas Citizenship for former Chinese nationals that would resemble the Indian model discussed below (Low 2016, 28). As a weaker alternative, the Chinese government has introduced and recently facilitated access to a “green card” granting foreign nationals a relatively secure status and rights, which is meant to attract Chinese-origin returnees. The authorities have, however, firmly rejected softening their prohibition of dual citizenship. Since 2014, the government has even stepped up its attempts to close loopholes by withdrawing local household registration (*hukou*) from Chinese citizens who it suspects are concealing a second nationality. Low (2016) identifies security concerns and the fight against corruption as the main reasons for this attitude. According to Chinese media reports, 18,000 officials have escaped the country since the 1990s, depriving it of 800 billion *yuan* (*ibid.*, 13). The global rise of the PRC has thus not led to a relaxing of attitudes towards dual citizenship, mainly because – in continuity with its communist past – the regime remains obsessed with domestic security and clings to a conception of sovereignty that excludes overlapping personal jurisdictions due to multiple nationalities.¹¹

As in the case of China, security concerns have been a major obstacle to the relaxing of a policy of singular citizenship in India. The context and nature of these concerns are, however, very different. In India, dual citizenship has been blocked by conflicts over postcolonial borders and the composition of the population. The traumatic experience of the partition of the British colony between India and Pakistan in 1947 cast a long shadow over later attempts to provide a form of quasi-dual citizenship to “Persons of Indian Origin” (PIOs) since 2003 which, in 2011, was merged with an “Overseas Citizenship of India” (OCI) – first introduced in 2005 (Naujoks 2015). The Constitution of 1950 had

¹¹ However, even in China, the legal prohibition of dual citizenship may still leave loopholes open for citizens who obtain a new nationality but conceal their new status in order to keep their Chinese *hukou* (personal communication by Choo Chin Low, 16 November 2020).

deprived those who had moved to Pakistan of their Indian citizenship while including as citizens those who moved in the opposite direction. It also adopted the principle of automatic termination of Indian citizenship as a consequence of the voluntary acquisition of a foreign nationality before January 1950. The Citizenship Act of 1955 and later amendments and citizenship rules in effect lifted such temporary limitations and made the ban on dual citizenship a permanent feature. *Ius soli*, which had been a British colonial legacy, was phased out in 1986 by stipulating that those acquiring Indian citizenship by territorial birth must also have a parent with Indian citizenship, thereby closing off a major source of dual citizenship by birth (Ashesh and Thiruvengadam 2017). India has been plagued by terrorism since independence and heightened security concerns seem to have played a role in preventing the option of full dual citizenship for the 20–25 million-strong Indian diaspora. OCI is essentially an immigration status for foreign nationals of Indian origin – other than Pakistani and Bangladeshi nationals and those with Pakistani or Bangladeshi parents. It provides its holders with multiple entry and a life-long visa to visit India, residence and employment rights but excludes them from voting rights and access to public office or property on farmland.¹²

Another border-related security concern is about the irregular immigration of Muslims, especially from Bangladesh, into the Eastern state of Assam. The Assam Accord of 1985 required that residents who had fled from what was then still Pakistan to India between 1966 and 1971 had to register to obtain their Indian citizenship. This also *de facto* excluded later arrivals from access to regular status and citizenship (Ashesh and Thiruvengadam 2017). A recent campaign to register Indian citizens specifically targeted populations in Assam who lack documentation on their residence status, as many earlier arrivals still do. A new immigration law, proposed by the BJP (Bharatiya Janata Party) government, grants facilitated naturalisation to undocumented migrants and refugees from neighbouring countries if they are Hindus or members of five other religions but does not apply to Muslims, who are instead classified as irregular migrants. In combination with the citizenship registration drive, this law thus closes an escape route into citizenship specifically for undocumented Muslims of immigrant origin (Singh and Raj 2020) who, in the past, often had access to official documents such as ration cards or voter registration that enabled them to eventually claim citizenship status (Sadiq 2009). Overall, India is much more welcoming for its diaspora than for its immigrants but has not been willing to accept dual citizenship for either category.

A third large country that illustrates another reason why the trend towards dual citizenship is not universal is Russia (see also Pogonyi's [Chapter 7](#) in this volume). Until

¹² A similar quasi-dual citizenship status was already introduced by Turkey in 1995 although, in this case, to compensate the diaspora for a ban on dual citizenship not in the country of origin (Turkey permits dual citizenship in outgoing naturalisations since 1981) but in the main host country, Germany (Çağlar 2004; Kadirbeyoğlu 2009).

recently, Russia restricted dual citizenship for children born abroad (both parents have to be Russian citizens) and for incoming naturalisations (a previous citizenship must be renounced) but not in outgoing naturalisations. In spite of this limited toleration, Putin's regime has aggressively bestowed Russian citizenship on the nationals of disputed territories in Russia's neighbourhood, including Transnistria in Moldova, Abkhazia and South Ossetia in Georgia and the territories in Eastern Ukraine controlled by Russian-supported separatists. Russia has also provided Russian-speaking minorities in Lithuania and Estonia – many of whom became stateless after these countries regained independence in 1990 – with options to acquire Russian citizenship. In an armed intervention in Georgia in 2008, the Russian government used the pretext of a duty and right to protect its citizens abroad. In 2020, the Russian Duma dropped any pretence by almost unanimously passing a law that also extends the toleration of dual citizenship to incoming naturalisations. According to news reports, this reform is expected to create up to 10 million new Russian citizens in the other post-Soviet states.¹³ Although Georgia remains thus far the only case where the mass conferment of Russian citizenship preceded armed intervention instead of following it, as it did in the case of Crimea and Eastern Ukraine, this "passportisation" of territorial conflicts provides an obvious explanation for why those post-Soviet states that are concerned about Russia's geopolitical drive towards regional hegemony (Estonia, Latvia, Lithuania, Georgia and Ukraine) have resisted the global trend and do not allow for dual citizenship in either incoming or outgoing naturalisations (Shevel 2019).

A final case I want to briefly consider is Hungary. In 2001, the first government led by Viktor Orbán introduced a Hungarian Status Law that provided a quasi-citizenship status to Hungarian-language minorities in neighbouring countries (Fowler 2004).¹⁴ In 2010, the second Fidesz government abandoned Hungary's opposition to dual citizenship and offered Hungarian minorities abroad privileged access to Hungarian citizenship without a requirement to take up residence in Hungary. This move was followed in 2011 by an extension of voting rights to Hungarian citizens residing abroad that effectively secured Orbán's constitutional majority in subsequent elections. Hungary's "soft irredentism" differs from Russia's hard policy of destabilising neighbouring countries through armed interventions. Hungary's policy did, however, trigger a severe backlash against dual citizenship when Slovakia reacted to the Hungarian citizenship law of 2010 by reversing its previous toleration and revoking Slovak citizenship for those voluntarily acquiring a foreign nationality – a move which did not target emigrants but Slovak citizens belonging to the Hungarian-language minority (Bauböck 2010). More recently, it also triggered a

¹³ See <https://www.themoscowtimes.com/2020/04/17/russia-passes-dual-citizenship-law-hoping-to-add-10m-citizens-a70036> (accessed 08 December 2020).

¹⁴ With the notable exception of Austria, as including the Hungarian minority in Burgenland province might have upset Hungary's efforts to join the European Union.

diplomatic conflict with Ukraine, whose government is strongly opposed to the toleration of dual citizenship and protested against the handing out of Hungarian passports to ethnic Hungarians in Western Ukraine.¹⁵ Scholars analysing the Hungarian policy have argued that it was primarily driven by Orbán's concern to consolidate his domestic power by whipping up nationalist resentment about Hungary's loss of territory in the 1920 Trianon Treaty and by creating loyal Fidesz voters in neighbouring countries (Pogonyi 2017; see also his [Chapter 7](#) in this volume).

5. Dual citizenship as a liability?

In the previous section, I argued that a historical or regional background of national security concerns can block moves towards the toleration of dual citizenship. The terrorist attacks of 11 September 2001 signaled a new kind of global security concern that has had a quite different impact on dual citizenship. Instead of reversing its toleration, many states have come to regard dual citizenship as an opportunity permitting them to shed responsibility for their citizens if these latter engage in terrorist activities. Revoking citizenship is a way of making (former) citizens deportable or of preventing their return to the country. The main obstacles for revocation are the international duties of states to prevent statelessness. However, withdrawing citizenship will not render the citizen stateless if the authorities can prove that she or he also possesses a foreign nationality. This generates incentives for states to engage in a vicious game of passing the buck by trying to "strip citizenship first. To the loser goes the citizen" (Macklin 2018, 171).

A probably incomplete list of legislation in liberal democracies that changed their citizenship laws to facilitate the denationalisation of convicted terrorists, terrorist suspects and "foreign fighters" includes the following cases: the United Kingdom (2002 and 2006), Australia (2007 and 2015), Israel (2008), Belgium (2012), Austria (2014),¹⁶ Canada (2014), the Netherlands (2017), Italy (2018), Germany (2019) and Denmark (2019).¹⁷

The most notorious among these is the UK, which changed its 2002 formula justifying citizenship deprivation from being responsible for acts "seriously prejudicial to the vital interests of the United Kingdom" to the Secretary of State being merely satisfied that "deprivation is conducive to the public good" in 2006. Until recently, the UK was also the only country on this list where the authorities must only have reason to assume that the person has access to another citizenship rather than having to prove that the person

¹⁵ See <https://www.bbc.com/news/world-europe-45753886> (accessed 09 December 2020).

¹⁶ After the terrorist attack in Vienna by a jihadist on 02 November 2020 the government announced a further amendment that would allow the revocation of Austrian citizenship in the case of even a mere attempt to join an armed group abroad instead of the 2014 law which requires proof of armed activities abroad. At the time of writing, this reform has not yet been introduced in parliament.

¹⁷ Some of these and other cases are documented and discussed in ISI (2020).

actually possesses a second citizenship that is recognised by the state concerned.¹⁸ In 2019, Denmark followed this example by allowing the Minister for Immigration and Integration to deprive a person of Danish citizenship if he or she does not currently possess another nationality but may acquire it through registration.¹⁹

However, there are also many countries that have resisted such policy changes because their constitutional laws or traditions do not allow the state to revoke citizenship. Among these are Poland, Spain²⁰ and the United States (Górny and Pudzianowska 2013; Marín et al. 2015; Weil 2013). There are also cases of policy reversal and failed attempts. Under the conservative Harper government, Canada introduced a citizenship revocation law in 2014 which was repealed under Justin Trudeau in 2017. In the aftermath of the 2015 terrorist attacks in Paris, French President François Hollande proposed to extend state powers of citizenship revocation from naturalised to French-born citizens and wanted to include such powers in the constitution but the legislators could not agree on a formula that would avoid treating dual citizens and mono-citizens unequally, which was regarded as incompatible with the constitutional principle of equality of citizens.

Without doubt, the “war against terror” has caused some collateral damage to dual citizenship and it did so not by leading states to restrict access to the status but by increasing the risks for individuals who possess it. Enhanced state powers of citizenship revocation should be regarded as very problematic from both liberal and democratic perspectives (Bauböck and Paskalev 2015; Lenard 2017). Yet such a normative critique does not damage the attractiveness of dual citizenship for those who cannot imagine themselves being caught up in state operations against terrorists. Incentives for individuals to claim second and third citizenships – and incentives for states to offer these – remain strong and the numbers of multiple citizens are therefore likely to increase even further.

6. Two scenarios about the future of multiple citizenship

We can, however, still imagine two scenarios in which dual or multiple citizenship might be limited or reversed. The first is a scenario of self-subversion, where the ease of access to multiple passports might cause a backlash among states that try to preserve the integrity of their citizenship. The second is a scenario where globalisation itself goes into reverse gear, thereby reducing incentives and opportunities for dual citizenship.

¹⁸ In a recent decision on the best-known case, the Special Immigration Appeals Commission upheld a decision by the State Secretary to deprive Shamima Begum of her UK citizenship because it concluded that she was a Bangladeshi citizen by descent, although the Bangladeshi authorities denied that this was the case. See <https://www.bbc.com/news/uk-51413040> (accessed 08 December 2020).

¹⁹ I am grateful to Eva Ersbøll for pointing this out to me.

²⁰ In Spain, only citizens by birth can not be deprived of their citizenship.

Peter J. Spiro has argued that the toleration of dual citizenship indicates that globalisation has irretrievably degraded the value of citizenship itself (Spiro 2016, Ch. 8). This is certainly true for states that use citizenship instrumentally in order to attract investors (Džankić 2019; Shachar and Bauböck 2014) or sports athletes (Shachar 2011). It is also true for individuals who take up these offers or use their ancestry in order to get an attractive EU passport from countries that hand out citizenship to distant descendants of their emigrants and expellees (Harpaz 2019; and [Chapter 5](#) by Harpaz in this volume).

The devaluation-of-citizenship thesis is less plausible for international migrants with strong ties to their countries of origin and residence. For them, dual citizenship has both instrumental and intrinsic value; it enables them to move freely between the two states where they have strong family ties, property and a political stake in the future of the society. For states involved in migration chains, the toleration of dual citizenship is driven by a change in their attitude towards emigration and immigration. If they use citizenship as a tool of integration rather than exclusion, this certainly changes its content but does not diminish its value.

Yet, if multiple citizenship no longer tracks the genuine links that connect individuals to states and if there are no limits to how many passports a person can acquire, the external and domestic value of citizenship will indeed both be degraded (Bauböck 2018). It will then no longer serve to identify those states that are responsible for certain individuals in terms of protecting their rights but also in terms of taking them back or punishing them if they are involved in serious crimes. The external value of citizenship as a responsibility-sorting mechanism in the international order depends on the mutual recognition of nationality between states. It is not only undermined by states that sell their passports but also by those that revoke the citizenship of terrorist suspects in order to shift the burden of punishment to other states. Moreover, citizenship will also be devalued internally as a status of equal membership in a democratic polity if individuals without genuine ties can not only take up residence but also vote in elections. This is not primarily a question of political influence – since foreign investors often have more political influence than individual citizen voters anyway – but of the integrity of democratic elections that is corrupted if money can buy the franchise. Even defenders of multiple citizenship who do not share this normative critique of a marketisation of passports might worry about a potential backlash against dual citizenship if a sufficient number of states and voters come to regard it as a symptom of hyperglobalisation that needs to be reined in.

The second scenario is one in which globalisation itself is reversed for reasons unrelated to migration and citizenship. This chapter was written during the global Covid-19 pandemic, which triggered an abrupt closure of borders and the suspension of international as well as domestic freedom of movement. Because of the huge damage to the economy caused by even short lockdowns, this crisis is unlikely to be a sufficient cause for a lasting reversal of the growth in human mobility that has characterised the

period of intensive globalisation since 1990. However, if the crisis lasts for much longer because vaccines are not efficiently distributed globally, an uncertain mobility value of even the most coveted passports may upset the global market for investor citizenship (Džankić 2020).

The corona crisis has hit the world during a time of heightened awareness about the longer-term and even more threatening climate crisis. It may well be that the combination of the two crises will convince many governments to slash higher taxes on air travel and to reduce reliance on global production chains by propping up the domestic or regional production of essential goods – from food to medicine and computing equipment. Such a renationalisation of the global economy could prepare the ground for changing individual behaviour and public policies resulting in a decline in global mobility, which would, in turn, depress both state supply and individual demand for instrumental citizenships.²¹

7. Conclusions

This chapter has outlined the interaction of national laws that produce dual citizenship and has used available data to illustrate the global trend towards greater toleration of this status. The main focus has been, however, on considering the limits of this trend. I have discussed three limitations: contextual reasons why some states resist toleration, the risk of citizenship revocation for dual nationals and two still largely hypothetical scenarios of the uncontrollable proliferation of multiple citizenship and of deglobalisation as an effect of pandemics and the climate crisis. Even taken together, these three limitations do not allow us to predict the demise of dual citizenship. However, if democratic citizens and states want to defend it as a progressive achievement in response to international migration, they should better strengthen the external and domestic value of dual citizenship by making it available to all those – and only those – who have genuine links to several states. Not only would this provide a justification for toleration but it would, at the same time, provide reasons for limiting access to the status to those who have good reasons to claim it.

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²¹ For a slightly different view, see Peter Spiro's [Chapter 4](#) in this book.

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