

Chapter 4

The Past and (Post-COVID) Future of Dual Citizenship

Peter J. Spiro, Temple University, Philadelphia

Abstract

Dual citizenship was once the bane of states and individuals. Today, a clear majority of states accept the status and it has become commonplace. The shift reflects changes in the nature not only of national identity but also of the individual's relationship to the state and to the world. States have almost no remaining incentive to police dual citizenship at the same time that individuals often have incentives, sometimes substantial ones, to secure it. This chapter first recounts how dual citizenship came to be normalised. It then considers how the COVID pandemic might impact on dual-citizenship opportunity structures. Although COVID may diminish the instrumental value of dual citizenship for purposes of third-country mobility privileges, it highlights the core benefit of admission rights into the country of additional nationality. Dual citizenship now becomes a kind of global health insurance as well as a way to protect mobility rights, even for those already holding premium passports. For transnational elites, these newly surfaced advantages will magnify incentives to secure investment citizenship. Others will be motivated to avail themselves of ancestral and other forms of strategic citizenship. States, meanwhile, are unlikely to see serious new costs to pre-COVID citizenship practices. Demand for dual citizenship is thus likely to rise while remaining broadly available.

1. Introduction

Citizenship tends towards stability. Citizenship has historically (more or less) reflected the terms of national identity which is slow in its shape-shifting. There are, of course, exceptions, as with mass extensions and deprivations of citizenship but, in most contexts, citizenship practice changes only incrementally, as a lagging indicator of gradual changes in the terms of national community on the ground. The contrast to migration policy is striking. Immigration, which regulates the terms of entry onto and presence in national territory, serves a number of functions which may be buffeted by political winds, changing conditions and immediate instrumental motivations, economic ones especially. Although citizenship and migration have been historically coupled, there have been many junctures at which careening turns in migration policies have left short-term nationality policies largely untouched.

However, slow change does not mean no change. Citizenship regimes are tectonic; one has to consider them in the long view. Dual citizenship is no exception. Taken in

a 50-year perspective, practice relating to dual citizenship has changed dramatically. Circa 1970, dual citizenship was tolerated by only a handful of countries. It still suffered more than a whiff of the opprobrium that had been associated with the status through the middle of the twentieth century, an opprobrium that once weighed heavily on it as something immoral. Today, a clear majority of states openly accept the status and it has become commonplace. The shift reflects changes in the nature not only of national identity over those years but also in the nature of the individual's relationship to the state and to the world. States have almost no remaining incentive to police dual citizenship at the same time that individuals often have incentives, sometimes substantial ones, to secure it. Although perceptions of the status are country-contingent, far from its prior, somewhat dodgy associations, dual citizenship has emerged as a status symbol in many contexts, a status to be advertised rather than concealed (Harpaz 2019; see also his [Chapter 5](#) in this volume).

Will this shift to normalised dual citizenship prove durable? The COVID-19 global pandemic will test the resilience of many facets of globalisation. The immediate consequences on immigration of COVID-19 have been acute and profound. Most countries imposed severe COVID-related restrictions on the in-movement of persons. Visa services were put on hold. Formal restrictions were reinforced by the near-disappearance of scheduled air transport. Much of the world was put on lockdown. One can expect many of these restrictions to stay in place even as vaccines are rolled out. Among those countries that manage to put a lid on the disease, there may be new constellations of revived mobility. However, normalising global movement to anything like the pre-COVID era looks like a long path.

Citizenship practices and policies are less obviously impacted. Traditional naturalisation should be unaffected to the extent that most applicants, for the short term at least, are already territorially resident. Dual citizenship might be different. Because citizenship status is coupled with entry rights, one might expect states to suppress dual citizenship among those of their non-residents lacking thick affective ties. Countries might change their view of these instrumental citizens, especially if they end up on their doorsteps instead of someone else's. One might also expect individuals to be less interested in acquiring additional citizenships to the extent that third-country travel privileges are no longer part of the citizenship package; if non-resident citizenship in a country no longer promises visa-free travel and settlement privileges, it might no longer be worth the trouble. Supply and demand may shift. Nevertheless, short of full deglobalisation and a sustained lockdown, citizenship is likely to remain a valuable asset at the same time that states are unlikely to see serious new costs to pre-COVID citizenship practices. The pandemic is unlikely to reverse a long progression towards the state acceptance of dual citizenship and individual interest in acquiring it.

This chapter first sets out a short history of dual nationality and its trajectory from universal opprobrium to wide acceptance. States once had a mutual interest in suppressing

the status to the end of managing interstate relations, through which national identities were hardened and segmented. As dual citizenship came to pose a less-grave threat to peaceful relations, the opprobrium eased. Only with globalisation and the blurring and demotion of national identities did the toleration shift to acceptance. The chapter then turns to the possible consequences of COVID-19 on this acceptance. To the extent that the pandemic results in partial deglobalisation and the reinforcement of home, it might be expected to reverse the normalisation of dual citizenship. This seems unlikely, however, as states will have little incentive to clamp down on the status at the same time that individuals will come to see novel advantages to holding dual citizenship, including as a kind of global health insurance.

2. Dual nationality as a threat to world order

I have told the story of dual citizenship at length and in brief elsewhere (Spiro 1997, 2007, 2010, 2016, 2017, 2019). Two threads explain dual citizenship's transformation: an interests-oriented exposition – considering the question from the perspective of states and individuals – and an identitarian explanation, through which dual citizenship supplies a lens to the meaning of membership in the national community. Both are, to a large extent, materialist in the sense that they flow from shifts in context. I do not mean necessarily to celebrate the status. The description is determinist rather than triumphalist in the sense that changes in world orderings have made the shift towards accepting dual citizenship inevitable and, in all likelihood, irreversible.

The interests-oriented perspective starts with the premise that manpower was once the fount of sovereign strength. Power was importantly correlated to military manpower. Of course, other factors were in play but the number of men who could be mustered to arms was a central determinant of a state's place in the early-modern pecking order. Before the age of migration, the aggrandisement and diminution of this power was typically accomplished by the acquisition or loss of territory (by force or marriage) along with the inhabitants therein. To the extent that the nation became an appropriate frame of association, the national affiliation of individuals flowed from territorial location, which was unlikely to change during the life of the average individual. The determination of nationality was not a difficult undertaking, to the point where it is arguably anachronistic to use the term at all – nationality simply was not an issue. Naturalisation was highly exceptional – dual nationality was essentially non-existent.

Once migration became a significant phenomenon, with the opening up of the New World, nationality's sorting function became more complex. War was important to building a sense of nationhood (Haller 2009). European sovereigns tolerated emigration as a partial remedy for economic, social and/or political difficulties and, in any case, lacked the apparatus to achieve effective exit control. However, population was considered a scarce resource and states particularly did not want to lose potential soldiers (Zolberg

2007). To that end, they refused to recognise transfers of nationality. States of origin refused to recognise the legitimacy of naturalisation before another state, even in the face of the individual's permanent resettlement, while the new state of residence looked to migrants to add to their own military strength.

The result was chronic and intense diplomatic disputes as each state of nationality claimed individual migrants as their own. The paradigm case involved a male migrant to the United States returning to his homeland only to face conscription or punishment for failure to satisfy military-service requirements. Claims on the part of the state of origin triggered diplomatic protection on the part of US authorities. Difficult as it may be to grasp the magnitude of this problem from our contemporary vantage point, this was a major irritant to relations between the United States and most major European sovereigns through the nineteenth and into the twentieth century. Dual nationality was a defining predicate of the difficulty. The refusal of the birth sovereign to allow the termination of nationality coupled with the acquisition of nationality through naturalisation gave rise to double nationality (as it was then denominated) and the obligations that came with it. Each of two sovereigns claimed the individual for purposes of military service – claims that inevitably resulted in serious bilateral conflict. The status came to be considered a bane of the international system (Salyer 2018; Spiro 2016).

Dual nationality made even less sense in terms of the individual's conceptual place in the world order, such as it existed. It is difficult to speak of national community in the early-modern period. However, the individual's relationship to his sovereign was central to individual identity (again, to the extent that it is appropriate to speak of identity as such for this time). The individual's connection to a sovereign was thought to be part of the natural order of things, a key link in the Great Chain of Being. This was a matter of birth, not choice. "Once a subject, always a subject" supplied the foundational principle of nationality. This was coupled with absolute duties of loyalty. Answerable only to God, the sovereign could do as he wished with his subject. This regime of "perpetual allegiance" was conceptually incompatible with dual nationality. It was also incompatible with the transfer of nationality; it supplied ideological grounds for sovereign refusals to recognise the legitimacy of naturalisation elsewhere. On the receiving end, it explains the vocabulary of after-acquired nationality. Sitting as a dead metaphor to contemporary ears, the term "naturalisation" implies an individual rebirth (to make natural), the only way the mechanism could be rationalised with perpetual allegiance.

The downside of dual nationality for individuals mirrored that for states. The failure of origin states to recognise transfers of nationality created onerous or conflicting obligations, especially with respect to military service (Bar-Yaacov 1961). To the extent that nationality now implicated agency (through the acts of migration and naturalisation), one can more confidently characterise national affiliation as having encompassed identity. It was an exclusive identity. The diversity of national systems in many cases did not permit coterminous membership; one could not be a faithful adherent of both monarchical and

democratic systems at the same time. Individuals took loyalty seriously, in any case. They sought not to accumulate nationalities but to substitute them, in a way that reflected changed life circumstances. Emigrants maintained sentimental ties to their homelands (in some cases, they did not naturalise and, in others, they returned to their countries of origin, in which case the native identity reverted). Nevertheless, in the dominant template, migrants would have looked to acquire nationality in the country of resettlement and shed that of their country of origin.

The antidote from both the state and individual perspectives was to accept such transfers of nationality. For states, the shift was a recognition that emigrants were lost to military service and that the diplomatic costs outweighed the benefit of keeping emigrants on the national rolls. (Even so, acceptance among states was balky. The UK led the way in 1870 and most major states had followed suit by the 1920s but some number of states – Iran and most Arab countries, for example – continue to hew to perpetual allegiance even today.) This was emphatically not an acceptance of dual nationality; on the contrary, the new practice built on its rejection with mechanisms to suppress it. Under the new norm, nationality was terminated upon naturalisation in another state and it forced those born with the status to choose one at majority. For the individual, the shift was framed as a vindication of the “right to expatriation” (Salyer 2018). This was a right to transfer formal national affiliation along with that of social and affective ties. To the extent that the regime was leaky, it was backstopped by strong social norms against the status and the reification of national identity. Bigamy was the standard analogy. US President Theodore Roosevelt, for example, derided dual nationality as a “self-evident absurdity”.

3. Tolerating dual nationality

The alignment of state and individual interests and identity persisted through the mid-twentieth century. The regime began to erode with the rise of human rights in the wake of World War II, which defused the threat which dual nationality posed to bilateral relations. States became less aggressive in policing the status. Individuals started to have a marginal interest in maintaining the status and less of an incentive to shed it, although norms backstopping singular loyalty proved sticky. However, it was not until the dawn of globalisation that the balance of interests and identity turned more clearly to the acceptance of dual citizenship. The blurring of national identities and the emergence of substantial benefits in the status laid the foundation for its rise.

From the perspective of states, dual nationality no longer posed significant world-order costs. This was partly contingent, partly systemic. The suppression regime eliminated the problem in a number of important pairings. After the UK legislated, in 1870, the termination of nationality upon naturalisation elsewhere, for example, bilateral difficulties with the United States were largely eliminated. Many continental states followed suit

with the so-called Bancroft treaties with the United States. The US itself set up an expatriation mechanism to terminate the citizenship of individuals who activated another citizenship, thus addressing the high incidence of dual citizenship among those born in the United States to immigrant parents (Weil 2012). For example, a person born in the US with an alternative birth citizenship automatically lost US citizenship upon enlistment in a foreign armed force.

After World War II, disputes were further diminished by Cold War alignments. NATO and other Western-bloc countries established a web of bilateral and then multilateral agreements to govern military-service obligations among dual nationals, limiting conscription to the state of habitual residence (Legomsky 2003). This eliminated the most important disincentive for the status. Dual nationality across the Iron Curtain, meanwhile, was not a problem. Those who escaped the Eastern Bloc did not go back and, in many cases, were stripped of their origin citizenship; dual nationals were not an independent cause of friction.

Perhaps more importantly, the advent of human rights shifted the logic of sovereignty. Before human rights, states could treat their nationals as they pleased but were constrained in the treatment of nationals of other states. Dual nationality confounded that symmetry. It presented a subclass of subjects for whom a sovereign was answerable to another sovereign, presenting inevitable irritants to interstate relations. With the adoption of a postwar human-rights regime, however rudimentary, dual nationals were no longer distinctive in this respect. States were now answerable to other states with respect to the treatment of all of their own nationals, whether mono or dual. The fact that a subject also had another nationality did not make him a peculiarly probable point of bilateral contention, at least not in a nineteenth-century way.

States also found themselves hemmed in by international law constraints advancing sex equality in nationality practice. During the nineteenth century and into the twentieth, most states automatically terminated the nationality of women upon marriage to foreign men. The practice was consistent with prevailing notions of patriarchy and a belief that the family should not bridge national divides. However, it had also been motivated as a mechanism for suppressing a source of dual nationality that would otherwise result from such mixed marriages, at least as long as some states automatically extended nationality to foreign women marrying male nationals (Irving 2016). This sex discriminatory approach was countered by a series of international agreements, culminating in the 1957 Convention on the Nationality of Married Women, which barred non-consensual changes of nationality on the basis of marital relations.

States, nonetheless, continued to disfavour dual nationality in the face of persistent understandings of nationality implicating loyalty and allegiance, though dual nationality never presented a serious national security issue. Nor did they or individuals have much incentive to facilitate the status. There was no understanding of strategic dual citizenship on the part either of states or of individuals.

Positive incentives emerged in more recent decades. For some states, dual citizenship became a way to cement ties with powerful diasporas. For sending states of the global South, where emigrants had once been seen as traitors to their homelands, they were now (through remittances and other economic contributions) understood as economic superheroes (see, for example, Fitzgerald 2008). Dual citizenship presented a costless tool by which to maintain cross-border solidarities. Home countries had an interest in their external nationals naturalising in their countries of residence by way of securing the benefits and security of citizenship, as well as exercising political power. The result was a wave of migrant source-states amending nationality laws in the 1990s, allowing the retention of nationality upon naturalisation in another country.

The shift in state incentives was also responsive to individual demand. Some of this demand has been rooted in the practical elements of cross-border lives. Diasporas chafed at having to secure visas to return home and at being subject to citizen-only restrictions on property ownership. They also looked to maintain a say in homeland politics (as more countries allowed dual citizenship, more also allowed non-resident voting). With remittances came power. When emigrant communities lobbied for the acceptance of dual citizenship, homeland governments had to listen and many responded.

The demand also reflected shifts in identity. Enabled by cheap travel and the Internet, migrants could sustain close ties with families back home. Even as they set down permanent roots in countries of relocation, their affections remained focused on their origin countries. Many thought to retire back home (even if, in the end, most did not). Loyalty no longer posed the same sorts of conflict as in the past; one could now have two nationalities without being forced to choose between them on most policy issues (much less armed conflict). As most states abandoned military-service obligations (Tarabar and Hall 2016), there was little cost to acquiring a new citizenship while keeping the old. Diaspora members also looked to maintain the homeland tie to pass the identity on to their children. This has become true even for external citizens of developed countries. Though immigrant-receiving European states had fewer incentives to accept dual citizenship than sending states, many have relented to calls from their own external citizen communities. Native-born Europeans who may have married nationals of other states and permanently relocated to other OECD countries increasingly want to keep their birth citizenship when naturalising in their new states of residence – and origin countries are acceding to the preference. A ratchet effect then comes into play; once states have acceded to external populations, they have a harder time resisting calls to accept dual citizenship for resident immigrants.

4. The new, new dual citizenship

These permutations of interests and identity on the part of states and individuals are continuous in one important respect: they consider individuals who have a meaningful

sociological connection to the state. That was the 1990s version of dual citizenship. The 2000s witnessed the rise of a new type of dual citizenship in which individuals acquired a second citizenship in a state of non-residence to which they had thin or even non-existent ties. There have been two notable mechanisms for this kind of citizenship: ancestry and investment. Ancestral citizenship implicates the extension of citizenship *iure sanguinis* on the basis of ancestry further removed than a parent. Investment citizenship programmes offer citizenship for sale.

Instrumental incentives play more clearly with respect to these citizenships. They have been tied to the increasing value of global mobility privileges. Citizenship through a good part of the late-twentieth century was not worth much beyond the state in which it was held. That changed as countries bifurcated their immigration policies, favouring some passports with visa-free entry privileges, while disfavouring others with increasingly formidable visa requirements. Citizenships correspondingly bifurcated for their third-country value, with some promising upgrades to facilitated global travel – a ticket to the (sometimes literal) fast lanes. With this new benefit, dual citizenship became attractive in non-immigration, non-diasporic contexts. This kind of dual citizenship was not about maintaining ties with the country in which one was born but about having a leg up in the global economy and unencumbered access to world destinations (Surak 2020).

The ancestral citizenship phenomenon is increasingly well documented. Tens of thousands of Argentine and Chilean citizens claimed Spanish and Italian citizenship in the early 2000s on the basis of their grandparents. In the face of a Latin American financial crisis, the acquisition in many cases was motivated by the economic opportunities that came with EU citizenship (Cook-Martín 2013). Serbians have claimed Hungarian citizenship as an EU *entrée*; Israelis have claimed a range of European citizenships, for both mobility and status purposes; pregnant women travel to the United States to secure birthright US citizenship for their children (Harpaz 2019). Citizenship, in these cases, is acquired on a non-resident basis. In some cases, it may have an affective element, actuating a sentimental ancestral tie. Some of those Argentines may really feel Italian, in a meaningful way. No doubt co-ethnics who have acquired Hungarian citizenship often have substantial sociological ties to Hungary through lineage and culture. However, some are acquiring the extra citizenship for purely instrumental reasons.

This is more obviously the case for investor citizens. Investor citizens have been looking primarily for the mobility privileges that come with the extra citizenship (Surak 2020). They are priced accordingly. Malta and Cyprus set the gold standard because their citizenship affords holders settlement rights in the rest of the EU and visa-free travel throughout the world. Citizenship in such island states as Dominica and St Kitts and Nevis comes with visa-free access to the EU. These programmes depend on dual citizenship and citizenship differentials. Very few would relinquish an existing citizenship for a new one in a country to which they have no intention of relocating. The incentive is provided by the differential value between the existing and the investment citizenship. As a Russian

or Chinese national, global mobility is encumbered. Citizenship in Malta or St Kitts and Nevis adds a value that (for the rich) is worth paying.

These strategic citizenships have also benefited states. Some states use ancestral citizenships to reify ethnic identities. In some cases, it has been put to work for electoral purposes, with Hungary supplying the most notable example (Pogonyi 2017). It has been a cheap way to atone for past sins, as with Germany's "restoration" of citizenship stripped by the Nazi regime or the more attenuated extension of citizenship to the descendants of Sephardic Jews expelled from Portugal and Spain in 1492. In all these cases, states may also be sorting for what they perceive to be assimilable migrants under cover of nationality policy (FitzGerald 2017). Spain and Portugal did not offer citizenship to the descendants of Moors expelled in 1492, after all.

As for investor citizenship, the benefits for some states is clear. Investor citizenship programmes reap substantial revenues at low marginal cost. For large economies, the programmes are arguable; even if successful, the revenues would not be proportionally significant. For some smaller states, by contrast, investment citizenship can account for a sizable proportion of government revenues. Investor citizenship activity has accounted for as much as 35 per cent of St Kitts' GDP, for example (Abrahamian 2015). As with natural resources, there are risks of mismanagement, as well as sustainability questions, especially in the face of increased competition (Xu, El-Ashram and Gold 2015). Nevertheless, investor citizenship programmes have proved a boon to a number of countries.

These new instantiations of dual citizenship are also congruent with changing, though contested, conceptions of citizenship. Ancestral citizenship works on the premise that national identity, however remote, can be actualised with full citizenship. It is (in effect) equating citizenship with membership in an affinity association. "Yes, I feel a little bit Irish because I have a grandfather who was born there, so I should be able to sign up for the club". This version of citizenship does not sit well with prior framings centering on loyalty and allegiance, framings that elevated the state above other forms of association.

Investor citizenship poses a more frontal challenge to these historical conceptions, shearing them of their near-sacred radiations. Citizenship has long been distinguished by its positive normative connotations. Investment citizenship not only dissolves those favourable associations but actually reverses them. Citizenship loses the implication of shared fate, mutual support and community trust and becomes just another incident of neoliberal consumerism.

This explains why investment citizenship has become a flashpoint in scholarly commentary (Shachar 2017). Even though the numbers are small, investment citizenship has triggered intense normative critique. No doubt investment citizenship is contested but the very fact that it exists as a non-trivial phenomenon – normalised, in effect – reflects a changed conception of citizenship. Roman citizenship could be bought, as could membership in early Renaissance city-states (Džankić 2019). At the apex of national identity during the twentieth century, however, the idea that one could buy an extra citizenship in

order to reap its benefits would have been considered nonsensical, perhaps outrageous. Today it has spawned an industry. Though some will continue to reject investor citizenship on ideological grounds, its acceptance by others evidences a shift in contemporary understandings of citizenship as an institution.

5. Enter COVID-19: dual citizenship as health insurance

That is where things stood before the end of 2019, with dual citizenship supplying a strategic tool for states and individuals as well as reflecting a changed understanding of citizenship generally. Then came the COVID-19 pandemic, which has destabilised the world in many respects, mobility perhaps the most notably among them. As of June 2020, most countries of the world were on near-complete lockdown. Will the pandemic reduce the appetite for dual citizenship? Perhaps. It is more likely to shift the material incentives for the status than extinguish them.

Of the three sources of dual citizenship – those who receive it at birth, those who naturalise after migrating and those who naturalise without migrating – the first two categories are unlikely to be much affected by the pandemic. Those who receive dual citizenship at birth typically do so automatically, so there is no agency involved. The incentives for naturalising in a state after resettling there are largely unchanged. If anything, there will be more reason to naturalise, insofar as there is any doubt about locational security. Migrants will look to formalise their right to remain and re-enter the country of naturalisation in the event of a subsequent pandemic or other emergency event, especially if they are able to retain their citizenship of origin. That added incentive will be marginal, as most countries appear to have excepted residents from entry restrictions although a rational immigrant could well see an added insurance value to acquiring citizenship.

Possible elasticity is found mostly in the last category – those who naturalise without migration through ancestral or investment citizenship. As discussed above, third-country mobility privileges have supplied an important incentive for non-resident naturalisation. These mobility benefits have been compromised by COVID-19. Citizenship in St Kitts will not get a person into the EU when a pandemic takes hold nor, for that matter, will a US passport. An EU passport would not for that moment facilitate travel to the United States; it might not even guarantee entry into other EU countries. Travel and settlement rights – which figure in recent passport rankings systems, most notably from the investor citizenship broker Henley and Partners – were severely compromised. This could affect the demand for non-resident citizenship.

However, at least in one obvious respect, the value of secondary citizenships is enhanced by the COVID situation and the prospect of future pandemics. In most cases, citizenship in a state still guarantees a person entry into that state. Even most (though not all) countries that have adopted total entry bans have excepted nationals from the

scope of the ban. That may not have seemed like much, pre-COVID. Today, being able to enter Malta or Cyprus or even St Kitts may look like a valuable escape hatch to potential investment citizens. For the very rich, the price tag is nominal. What good does a private jet do you if you have no place to go? As Surak (2020) describes it, the rich see investor citizenship as a matter of accumulating options and “Plan Bs”. Like insurance in other, more quotidian realms, having the extra citizenship imparts a sense of well-being even if you never end up having to collect on it.

The same may go for those with ancestral and other nominally established qualifications for citizenship. It is well established that insurance against political risk is an important motivation for acquiring non-resident citizenship (Knott 2019). Now we might speak of insurance against health emergencies. Individuals will see this as a benefit of securing an additional citizenship. It may or may not be rational – who knows whether the country in which a person’s grandparent was born will be a shelter from the next pandemic storm – but the additional citizenship and entry rights into that single country will supply value and, in most cases, cost little if anything.

Moreover, travel and settlement privileges will almost certainly be restored at some point, at least in some constellations. Although COVID-19 probably presents the most serious threat to free movement in the European Union’s history, it is unlikely to shut it down on a permanent basis. Pre-COVID visa-free travel between other states will be restored, at least among countries that have eradicated the virus. In the run-up to COVID-19, in the first quarter of 2020, demand for investor citizenship reportedly grew by over 40 per cent. Most of the recent entry restrictions will be lifted as the vaccine is widely administered. Global travel is unlikely to return to its recent capacity for many years although mobility privileges may. Citizenship is a longer-term investment (literally or not); many individuals who acquire a second citizenship do so not to facilitate short-term plans but, rather, to expand life opportunities, sometimes intergenerationally. It will take more than an outlier moment to erase that perception.

6. The low cost of pandemic citizenship

Sustained demand for extra citizenships will be meaningless if states opt to suppress the status. This seems unlikely. There is no COVID-related cause for reversing the acceptance of dual citizenship with respect to those born with the status or those who naturalise as residents. Even with respect to non-resident naturalisation, states will have little justification for constraining the citizenship of those with “genuine links” to a state, in the framing of such prominent theorists as Rainer Bauböck (2018) and Ayelet Shachar (2009). They will also have a hard time distinguishing those who have genuine links from those who do not. The one context in which such sorting is more readily undertaken – investment citizenship – is also unlikely to be scaled back. Dual citizens do not cost states very much, even under pandemic conditions.

The pandemic demonstrates the continuing strong pull of national identification. More accurately, perhaps, it shows the continuing salience of home even in the face of globalisation. As the pandemic unfolded on a global basis, many people went back home – not only those who were travelling abroad as tourists but also those who had been resident abroad. That seemed natural. There were few objections to permitting the re-entry of these individuals (there may have been issues relating to quarantine but that is a separate matter). Amidst the nationals who were excepted from entry bans, there will have been some instrumental citizens, those who were not returning home but who were seeking refuge from their dangerous places of residence and primary citizenship – those who were seeking refuge from home rather than returning to it.

However, one supposes that they were not that many and, in any case, not so many as to pose any significant burden on the state of non-resident citizenship. Because of the global nature of the pandemic, the value of being in one country over another (with very few exceptions, like New Zealand) has been relative. It is not like fleeing a war zone for a peaceful zone. However much an American with an instrumental EU passport might have been tempted to relocate there, say to Germany or Austria, it would have been a difficult time to establish residence – to make a home – because those places were under lockdown, too. By way of some evidence (and supporting the contrast to those trying to escape conflict) there has been no carping about “Canadians of convenience” and the like being evacuated from trouble spots courtesy of the state, as happened when Canada spent millions rescuing thousands of dual Lebanese-Canadians caught up in the 2006 conflict between Israel and Hezbollah (Nyers 2010).

Even if some individuals have exploited instrumental citizenships for entry purposes in the face of COVID-19, they posed no different a health hazard than mono- or dual nationals who were returning to their real homes. So long as containment remains a possibility, all entrants pose a risk, which will be variable according to travel history and other factors – dual citizenship not among them. The entry of large numbers of non-resident citizens could burden quarantine capacities. If, for instance, large numbers of non-resident Irish citizens had decided to take advantage of the status and relocate to Ireland as the pandemic unfolded, that would have been a problem. However, there appear to have been no major instances in which states chafed at admitting non-resident dual citizens as they locked down borders against non-citizens. It is unlikely that governments will look to suppress dual citizenship preemptively as a measure against future global health emergencies.

For states with investor citizenship programmes, the balance is clear-cut. As economies crater everywhere, governments will be hard pressed to maintain revenue levels. If investor citizenship was important to some economies pre-COVID, it will be all the more important today. This will be especially true for those Caribbean states whose economic lifeblood, tourism, has evaporated almost overnight. Countries with investor citizenship programmes will now have to contemplate recipients who will actually go to live with

them – there has always been that fiction, at least. The numbers are small enough that protective health measures can be put to work to protect against the minimal added risk of entrants numbering in the hundreds at most. If anything, the scope of investment citizenship may broaden as states whose passports never offered much in the way of global travel rights can at least offer a shelter from spreading disease.

7. Citizenship after COVID-19

COVID-19 is unlikely to reverse the decades-long move to accept dual citizenship. Will it change citizenship in other ways? Perhaps. The fight against the virus may revive some citizenship solidarities. To the extent that everyone feels “in it together” and to the extent that the state is a key part of the answer, citizenship could enjoy a comeback. However, both of these conditions look empirically variable. In some countries – the ones that succeeded in putting a lid on infections – there should be a revival of constructive nationalist sentiment. In countries like South Korea, New Zealand, Taiwan, Denmark, Austria and (perhaps) Germany, one can expect a deserved sense of national pride. Citizenship in those countries may take on new affective and instrumental value. In others – the US, the UK, Italy, France, Russia, Brazil – maybe not so much. The US, particularly, is riven by political and other divisions, which COVID-19 appears to be compounding. The failure of the federal government to muster even a semi-competent, bipartisan response is likely to accelerate a growing sense that the United States is losing coherence.

Perhaps subnational solidarities will be reinforced where national ones fray. The coronavirus is global but, of course, is territorial and spatial in its impact and transmission. One has to count on neighbours at least to be responsible – to be “good citizens” in an everyday sense. How that maps onto the formal institution of citizenship remains to be seen.

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