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Access to Citizenship and the Role of Origin Countries

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1. Introduction¹

For foreign-born residents and their children, attaining citizenship in the host country confers membership, rights and participation opportunities, and encourages a sense of belonging (Bloemraad 2006). From a destination country perspective, naturalisation is increasingly seen as an important part of the process of integrating immigrants. In order to optimise the use of what is sometimes termed the ‘citizenship premium’, actors in destination countries often advocate public policies that are aimed at increasing naturalisation rates among immigrants (OECD 2011; Sumption and Flamm 2012). The

¹ This chapter is dedicated to the memory of Jaap Dronkers, a dear colleague and mentor who sadly passed away in March 2016. We will miss Jaap’s curiosity and enthusiasm dearly. Parts of sections “Methodology used in research in the field” and “Proposed theoretical framework” are derived from Vink et al. (2013) and are included here with permission of John Wiley and Sons. This chapter also draws on research findings from ongoing collaboration with Gerard-Rene de Groot, Chun Luk, Floris Peters and Hans Schmeets. The contribution by Maarten Vink to this chapter is financed by the European Research Council (ERC) under the European Union’s Horizon 2020 research and innovation programme (grant agreement No 682626). The authors would like to acknowledge Philippe Fargues, Anne Unterreiner and Agnieszka Weinar for their constructive input to this chapter as well as for their feedback on an earlier draft.

acquisition of citizenship is associated with better employment probability, higher earnings and higher occupational positions (Liebig and von Haaren, 2011). Politically, in a democratic context, citizenship normally qualifies immigrants to take an active part in the electoral politics of the destination country ([Pikkov 2011](#); [De Rooij 2012](#)).

Yet, immigrant naturalisation rates vary greatly across countries and between immigrant groups (Eurostat 2015). This heterogeneity first of all reflects different pay-off structures between groups, in terms of the relative added value that is offered by the acquisition of destination country citizenship vis-à-vis the citizenship of the origin country and the costs associated with acquiring a new citizenship, such as naturalisation fees, investments in language skills and other integration requirements, as well as the potential loss of the origin country citizenship. While for many immigrants the acquisition of citizenship of a member state of the European Union implies a life-changing event for the immigrants and his or her family, for others this ‘investment’ simply does not make sense. This pay-off structure is, to a large extent, determined by characteristics such as the levels of economic development and political stability associated with the origin country.

Aside from this well-established *endogenous origin country effect* (using the terminology of this volume), immigrant naturalisation rates are also affected by *diaspora policies* of the origin country that are aimed at maintaining ties with the emigrant community. Most notably, this relates to the phenomenon of dual citizenship, which is understood as an individual’s possession of two citizenship statuses. Dual citizenship is a fact of life in a mobile world. As a result of international migration, rearrangements of the territorial scope of states and the lack of global coordination between citizenship laws, millions of people worldwide are citizens of two or more, states (Faist 2009; Faist and Kivisto 2007).² In Europe, where increasing gender equality provides both the father and the mother the opportunity to transmit their citizenship to their offspring, children often automatically become dual citizens at birth when their parents are citizens of different states. They often also acquire two citizenships when they are born in a different country than their parents and their country of birth has a regime of territorial birthright ([Vink and De Groot 2010](#)). Moreover, many people acquire an additional citizenship at a later stage of life because

² In this chapter we use the term ‘*dual* citizenship’, but it is possible that individuals possess more than two citizenship statuses, in which case the term ‘multiple citizenship’ would be more appropriate.

they take up residence in country other than where they born and wish to consolidate their position in that new society by acquiring citizenship there.

Despite its ascendancy as a demographic phenomenon, dual citizenship is still seen by many as a problematic phenomenon that should be avoided if possible. In line with a traditionally restrictive approach to dual citizenship in international law, a substantial number of states in Europe and beyond actively discourage multiple citizenship, by requiring candidates for naturalisation to renounce their previous citizenship prior to naturalisation or by having provisions that lead to the automatic loss of citizenship when their citizens voluntarily acquire another citizenship (Vonk 2012; Vink and De Groot 2010). However, the worldwide number of states with a restrictive approach to dual citizenship has been decreasing for the past few decades and migrants are thus increasingly less often compelled to make a decision regarding their choice of citizenship (United Nations 2013: 113; Vink, De Groot and Luk 2015). The role of actors in third countries, while only one of the factors of integration that determine the adoption of citizenship, is crucial since particularly by allowing dual citizenship, countries of origin can take away a major constraint for immigrants in the naturalisation process. Research shows that naturalisation rates are positively impacted by tolerant policies towards dual citizenship (Jones-Correa 2001; Vink, Prokic-Breuer and Dronkers 2013; but see Yang 1994; Dronkers and Vink 2012).

This chapter addresses the question of how immigrant integration in European destination countries, through the acquisition of citizenship, is influenced by both the economic and political characteristics of origin countries (origin country effects), as well as their policies regarding dual citizenship (origin country policies). In the remainder of the chapter, we first discuss the main methodological approaches in researching integration in this field of research, with particular attention to the influence of the countries and societies of origin. Some conceptual clarifications will be made as well. Subsequently, we outline the actors involved and identify the diverging and converging interests of the countries of origin and destination, as well as the strategies of the societies of origin to advance their interests. The chapter will then outline the theoretical framework, which is then also illustrated by case studies that show the relationships between the countries of origin and their impact on migrant communities abroad. The conclusion will reflect on the central question of the volume (tailored to this chapter): how can naturalisation policies in EU member states, in

the context of ‘origin country effects’ and ‘origin country (dual citizenship) policies’, optimally facilitate access to citizenship, especially by third-country citizens, while retaining citizenship as a value good that offers a genuine premium for integration?

2. Methodology used in research in the field

Three conceptual clarifications should be made from the start. First, an ‘immigrant’ is defined as a person born in a third country and residing in the European Union. While immigrants can be understood more generally as all foreign-born persons residing in a country, following the overall focus of the book the discussion in this chapter is restricted to immigrants from non-EU countries. Second, ‘integration’ as understood as the process by which immigrants become accepted into society, both as individuals and as groups ([Penninx 2003](#)). This definition thus views integration deliberately as a process, rather than as an endpoint and also is deliberately open as to what precisely determines the acceptance of immigrants in a society, which may –after all– vary from one receiving society to the other. Thirdly, ‘citizenship’ is a legal status and relation between an individual and a state that entails specific legal rights and duties (EUDO CITIZENSHIP 2013a). In some countries, the status may be called ‘nationality’ rather than citizenship and the persons holding the status are referred to as nationals rather than citizens. In this chapter, the terms citizenship and nationality are conceived as interchangeably, though for the sake of clarity we systematically use the first term only.

Following these conceptual clarifications, the chapter starts out on the basis of two assumptions with regard to the role of third countries with regard to immigrant integration and access to citizenship. While these two assumptions are not intended as undisputable starting points for the following discussion, they do indicate the theoretical scope within which this chapter should be positioned. The first assumption is that the access to citizenship can be seen as indicator of integration, in the sense that it closes an important legal gap between immigrants and natives. However, although from the perspective of ‘becoming accepted into society’ acquiring destination country citizenship is likely an important step in the integration process, it is not seen as the endpoint of this process. Hence, in this chapter the access to citizenship is viewed as a necessary, but not a sufficient condition for full integration of immigrants in the destination country. The second

assumption is that third countries cannot directly influence the acquisition of citizenship by immigrants in EU member states, which is after all a sovereign competence of the respective state (within the constraints set by international law, for example with regard to the avoidance of statelessness); however, particularly by allowing dual citizenship, countries of origin can take away a major constraint for immigrants in the naturalisation process. Hence, political actors in origin countries, such as legislators who determine the rules of dual citizenship as well as government officials linked to diplomatic representations who may reach out to the emigrant community, are expected to be able to play an important role in the process of integrating migrants in destination countries, in terms of stimulating (or not) the acquisition of citizenship. Their role, however, is necessarily one that should be understood in conjunction with the constellation of actors and rules in the destination country.

The question of immigrant naturalisation is not a new question in the migration literature. A well-developed body of research looks at the determinants of naturalisation, mostly but not exclusively in the North American context ([North, 1987](#); [Portes and Curtis, 1987](#); [Yang, 1994](#); [Jones-Correa, 2001](#); [Chiswick and Miller, 2008](#); [DeVoretz and Pivnenko, 2004](#); [Bloemraad, 2002](#); [Rallu, 2011](#); [Liebig and Von Haaren, 2011](#)). Typically, these studies look at a range of individual characteristics, such as educational attainment, age at migration, years of residence, family situation and, relating to country of origin, economic development, the political situation and toleration of dual citizenship (for a recent comprehensive overview and analysis, see [Chiswick and Miller, 2008](#)).

While these studies have contributed to our understanding of the determination of citizenship take-up among immigrants, their comparative scope is surprisingly limited, from the perspective of migration destination countries. Most studies focus on the North American context, with key contributions looking in particular at the case of the US ([Yang, 1994](#); [Jones-Correa, 2001](#); [Chiswick and Miller, 2008](#); see also [DeVoretz and Pivnenko, 2004](#) on Canada). Some notable exceptions exist, though at best they compare a few countries. In the context of the ‘naturalisation gap’ between Canada and the US, for example, important work draws attention to the extent to which naturalisation is institutionally encouraged ([Bloemraad, 2002](#); [Picot and Hou 2011](#)). Other studies have investigated the relevance of the citizenship legislation in countries of origin, in particular in relation to toleration of dual citizenship ([Jones-Correa, 2001](#)). These examples, however,

are exceptions confirming the rule, as we are still a long way off from understanding the relationship between country of origin features, individual characteristics and the institutional opportunity structure in which naturalisation takes place.

In particular, in Europe, where citizenship policies differ substantially ([Vink and De Groot, 2010](#)), we see large differences in citizenship take-up rates, with around 80 percent of the foreign-born population naturalised after at least ten years residence in the Netherlands and Sweden, around 65 percent of a comparable group in the UK, 50 percent in France and only around 35 percent in Germany and Switzerland (Liebig and Von Haaren, 2011: 28). The logical question is thus: are these differences in citizenship take-up rates explained by differences in the demographic composition of the immigrant population, or rather by the institutional structure made up of citizenship policies in the countries of origin *and* destination? We cannot answer this important policy-relevant question without an explicit cross-national comparison. Hence, as both the composition of immigrant populations *and* citizenship policies across Europe vary significantly, studies which take the idea of a ‘citizenship constellation’ (Bauböck 2010) seriously, should include a comparative design captures, in addition to the individual characteristics of migrants and aspects of the opportunity structures in destination countries, also the features of rules and practices in origin countries. While advanced methodological techniques, such as cross-classified multi-level analysis (Van Tubergen et 2004) allow capturing such complexities, their application in the field of citizenship studies so far is still the exception, rather than the rule (see e.g. Dronkers and Vink 2012; Vink, Prokic-Breuer and Dronkers 2013).

In terms of the question of the ‘citizenship premium’, much of the recent literature has focused on the question whether citizenship acquisition actually improves labour market performance or whether immigrants who perform better on the labour market are more likely to naturalise. In other words, is there unobserved heterogeneity, for example related to ability or motivation of immigrants, which is driving the association between naturalisation and economic performance? This causality question is clearly of key importance and scholars have developed specific methodological strategies depending on the type of available data, such as using instrumental variables (Bevelander and Pendakur 2012; Rallu 2011) or a Heckman two-stage model (DeVoretz and Pivnenko 2005) for cross-sectional datasets, or individual fixed effects and longitudinal analysis with panel data ([Bratsberg et al 2002](#); [Steinhardt 2012](#)). The common denominator of these studies with a

more refined analysis of the relation between naturalisation and economic performance is that when controlling for self-selection the citizenship premium decreases, but –crucially– remains significant (see Scott 2008, for a contrasting view).

While most studies of the relation between naturalisation and integration, have focused on policies and structural context of destination countries, particularly in Europe there is relatively little attention for the role of origin countries in the process of naturalisation and integration of immigrants. Yet it is evident that the ‘origin factor’ matters significantly when assessing the question of immigrant integration. Especially, dual citizenship policies in origin countries should be taken into account as a potential facilitating or restraining factor for the process of integration of immigrants. These dual citizenship policies may be reflected in general rules in constitutions or citizenship laws on the loss of citizenship upon voluntary acquisition of another citizenship (see below), but also in more specific bilateral agreements between countries or rules that only apply to citizens from certain countries (see for example the German exception for EU citizens).

In Europe, as elsewhere, we see that many traditional emigrant countries initially develop a restrictive attitude towards the acquisition of foreign citizenship by the emigrant community, yet later often develop a more tolerant approach. A state of origin as Mexico originally have sought to exercise control over the diaspora by penalising the acquisition of foreign citizenship with the loss of the citizenship of origin, yet now recognize that ‘mexicanidad’ can be maintained while acquiring, for example, US citizenship (Fitzgerald 2009: 33). Also in Europe we see an unmistakable trend that states increasingly start to reconceptualize citizenship in a more transnational manner ([Vink and De Groot 2010](#)). This affects both European receiving countries, such as Germany, France and Italy, as European countries of origin, such as Armenia or Ukraine. In post-Soviet Armenia, for example, the approach to dual citizenship was originally largely restrictive, as a result of concerns that the Armenian naturalised abroad would be able to avoid military service at the time of the conflict over the Nagorno-Karabakh territory. In a more general sense, due to the sizeable diaspora, there have been strong concerns about the interference in Armenian politics and society of foreign citizens, in the case of Armenians who have acquired another citizenship (Makaryan 2013: 6). However, since 2007, dual citizenship has been fully accepted and acquiring the citizenship of another state no longer implies the automatic loss of Armenian citizenship (Makaryan 2013: 15).

Moreover, in addition to these *formal rules*, what matters equally –and has been relatively under-researched so far– is how e.g. governmental actors in origin countries *in practice* stimulate or discourage the acquisition of a foreign citizenship by the emigrant community. For example, in Ukraine, there is an overall negative attitude towards dual citizenship, as a result of concerns about the sovereignty and territorial integrity of Ukraine vis-à-vis Russia (Shevel 2010: 1). However, more recently the attitude against dual citizenship has softened and in practice allows many Ukrainian citizens who acquire a foreign citizenship to retain their citizenship of origin (Shevel 2010: 11). A similar trend can be observed in Georgia, where in 2004 a special ‘dual citizenship commission’ was formed to create a more liberal framework for dual citizenship, in response to demand from the sizeable Georgian diaspora (Gugushvili 2012: 9). However, in Georgia, as in Ukraine, the legal framework remains unclear as to the extent to which dual citizenship has been embraced or not and, at times, seems to be applied in a problematic manner in cases of political controversy (Gugushvili 2012: 23).

There are two reasons for why dual citizenship policies in origin countries should be taken into account, from the perspective of the integration of immigrants in destination countries. First, being able to retain the citizenship of origin generally can be expected to increase naturalisation rates among immigrant groups. Jones-Correa (2001), for example, demonstrates that changes in citizenship policies in Latin American countries in the 1990s had a positive effect on naturalisation rates among immigrants groups in the US from countries that recently allowed dual citizenship. Vink et al (2013) demonstrate that in 15 European countries the possibility of retaining the citizenship of origin, depending on citizenship law in destination and origin countries, positive correlates with the propensity to naturalise. In Portugal, for example, low naturalisation rates among the Ukrainian community are mainly attributed to the risk of losing Ukrainian citizenship (EUDO CITIZENSHIP 2013b: 13). This indicates that, in as far as there has been a softening of the negative attitude towards dual citizenship in Ukraine (see above), this has not yet translated into a proactive policy, for example through the diplomatic representation in Portugal, to encourage the naturalisation of Ukrainians in Portugal (but see eg ACIDI 2011). Mazzolari (2009: 187) also links the increased propensity to naturalise to improve integration outcomes: ‘Immigrants coming from countries that have recently allowed dual citizenship are found not only to be more likely to naturalise but also to experience relative

employment and earnings gains and to lower their reliance on welfare.’ This relates to the benefits of naturalisation, such as increased employability, as discussed below.

Second, there is the question of how retaining the citizenship of origin influences the integration process. While there is some limited work on the relation between dual citizenship and sociocultural integration and political participation (e.g. eg. [Staton et al 2007](#); Dagevos 2008; Ersanilli and Koopmans 2010), there is a much more limited literature on the relation between dual citizenship status and socioeconomic integration. As a result, few studies on the relation between naturalisation and economic integration, or other integration indicators, employ explicit methodologies that allow for the identification of the influence of the origin countries. As argued by Peters and Vink (2016), the literature on citizenship and integration has developed methodologies mainly aimed at detecting *whether* destination country citizenship matters, which may not necessarily be suited to analysing the question *to whom* citizenship matters.

3. Discussion of the literature: focus on the role of the country of origin

This section outlines the actors involved in the process of immigrant integration in destination countries and identify the diverging and converging interests of the countries of origin and destination, as well as the strategies of societies of origin to push their interests. We start by discussing the relation between citizenship and integration and then go into the question to what extent and how actors from origin countries can encourage the access to citizenship of migrants in destination countries.

The relation between naturalisation and the structural integration of immigrants (i.e. their inclusion into existing social structures, such as the labour market) has received increasing scholarly attention since Chiswick’s (1978) seminal study of the effects of citizenship acquisition on earnings of foreign-born men in the US. While the literature is marred by differentiated findings, depending on choice of destination country, immigrant group, dependent variable (e.g. employment status or income) and methodological design (e.g. based on cross-sectional or longitudinal data), it is fair to say that the consensus is that overall naturalisation has a strong potential to improve the economic well-being of an

immigrant (see e.g. [Bratsberg et al, 2002](#); [DeVoretz and Pivnenko 2005](#); [Mazzolari 2009](#); OECD 2011; [Rallu 2011](#); [Bevelander and Pendakur 2012](#); [Steinhardt 2012](#)).

In as far as a ‘citizenship premium’ is observed in the literature, the main reasons are seen as threefold: a) *unrestricted access* to the labour market: in many countries citizenship is still a requirement for certain jobs, particularly in the public sector; b) *better employability*: the absence of administrative costs associated with work and residence permits makes it easier to hire naturalised immigrants; and c) citizenship acquisition as a *signalling device* of integration: naturalisation indicates a clear commitment of the immigrant to remain in the country of residence, hence lowering the uncertainty of the employer, and formal equality also decreases (though does not prevent) the risk of discrimination. On the whole, naturalised immigrants thus are generally seen as more likely to have paid employment and less likely to be unemployed, as well as more likely to have higher earnings due to better occupational status (Liebig and von Haaren, 2011).

When we look more specifically at the literature on the relation between *dual* citizenship status and immigrants integration, what strikes is that the relevance of retaining origin country citizenship is framed virtually exclusively as a naturalisation effect: ‘Immigrants coming from countries that have recently allowed dual citizenship are found not only to be more likely to naturalise but also to experience relative employment and earnings gains and to lower their reliance on welfare’ (Mazzolari 2009: 187). In other words, Mazzolari compares those naturalised immigrants with non-naturalised immigrants, but does not compare naturalised immigrants *with dual citizenship* with naturalised immigrants *without dual citizenship* (cf. Liebig and Von Haaren 2011: 30). One important reason for this limited analysis of dual citizenship is data availability: while national registration data and international surveys (such as the European Social Survey and the Labour Force Survey) include valuable information on destination country citizenship, they seldomly include data on retention of origin country citizenship.

The key ‘citizenship’ question is thus often seen as whether an immigrant has destination country citizenship or not (see e.g. OECD 2011), whereas keeping the origin citizenship is seen as relevant only in terms of the extent to which it influences the propensity to naturalise. There is some limited work, though with rather mixed findings, on the relation between dual citizenship and sociocultural integration and political participation (e.g.

[Staton et al 2007](#); [Dagevos 2008](#); [Ersanilli and Koopmans 2010](#)). Yet overall, the literature on the ‘citizenship premium’ treats dual citizenship as largely irrelevant from the perspective of affecting the potential pay-off of naturalisation, in terms of improving integration outcomes.

In other words, the default assumption seems to be that what matters for the integration of an immigrant is destination country citizenship, not origin country citizenship and in as far as the latter is relevant, it is because of the relevance for the propensity to naturalise. However, to what extent this assumption is empirically valid, is a largely unresearched question. While this is a question that often arises in political debates on dual citizenship (see e.g. Schmeets and Vink 2011, on the Netherlands), in academic studies the question has been mainly left unaddressed. From the perspective of this brief literature review, the main identifiable gap in the literature thus relates to the under-researched issue of the relevance of retaining origin country citizenship for the relation between naturalisation and immigrant integration.

In the next section we discuss two sides to this under-researched question: first, the question to what extent dual citizenship policies in origin countries affect the propensity to naturalise, for migrants in destination countries; and, second, the question to what extent the ‘citizenship premium’ is affected by an increased propensity to naturalise for immigrants from origin countries that allow dual citizenship.

4. Proposed theoretical framework

Citizenship is a legal status and expresses a relationship between an individual and a state that entails specific legal rights and duties. As for the rights attached to citizenship, the most important right associated with citizenship is the protection by the state and unrestricted access to the territory. Even if alternative permanent residence statuses, such as the green card in the US, may provide sufficient security of residence and strong protection against expulsion, ‘naturalisation’ ultimately transforms a foreigner into a citizen. Citizenship provides additional privileges, such as diplomatic protection, the right to vote, and access to public sector jobs, to name a few. This section highlights research on the impact of origin country effects and origin country policies on, first, immigrant naturalisation rates and, secondly, integration outcomes associated with naturalisation.

Citizenship of origin and the naturalisation propensity

Citizenship laws vary greatly between countries and thus may well explain differences in terms of naturalisation rates between similar immigrant groups. Typically, we see important differences between immigration countries, such as Canada and the United States, and most European countries. In the North American context, birth in the territory gives automatic access to citizenship to the second generation and naturalisation is seen as a natural part of the integration process that follows immigration. In most European countries, by contrast, citizenship acquisition has for a long time been dominated by descent-based transmission from one generation to the next and therefore was never very accessible to immigrants. However, within Europe we see a large variety of policies that regulate access to citizenship and some countries, notably Ireland, the United Kingdom and France, have stronger *ius soli* traditions, which is partly still reflected in citizenship policies of today (see for example, Baubock et al., 2006; Brubaker, 1992; Janoski, 2010; [Vink and De Groot, 2010](#); [Weil, 2002](#)).

Aspects of citizenship laws that influence the ‘accessibility’ of citizenship for immigrants are the conditions for ordinary naturalisation, such as residence requirements, dual citizenship toleration, language and integration requirements, fees, and administrative discretion. For children of immigrants and subsequent generations, *ius soli* birthright also matters greatly as this determines whether they are included at birth as full members of the political community.

Although the acquisition of citizenship can offer significant benefits, we know that some immigrants naturalise and other do not. Why is that? Yang (1994: 457) argues that immigrants’ perceptions of the costs, benefits and meaning of naturalisation are conditioned principally by the socio-economic situation in their countries of origin: insecurity, poor economic conditions and low standards of living may deter immigrants from desiring to return to their homelands. In other words, citizenship provides security, but the utility of naturalisation is appreciated differently among immigrant groups, depending on their country of origin context (Jasso and Rosenzweig, 1986: 303; [Bueker, 2005](#); [Logan et al, 2012](#)). Based on this reasoning, one would expect, certainly in developed European countries (as in North America), that the citizenship take-up rate is higher among immigrants from less developed or lower-income countries. The context of country of

origin is thus, first and foremost, relevant in terms of motivating the demand for naturalisation from an immigrant's perspective.

Based on the literature, one would assume that differences still exist among immigrants in their perceptions of the chances of life improvement secured by citizenship, even within groups coming from countries of origin with relatively similar levels of development. If seen as a life-course event ([Tucci, 2011](#)), citizenship take-up is likely to be influenced by expectations and ambitions related to an individual's life situation. For example, we expect that residence matters: the longer an immigrant resides in a country, the higher the expectation of legal incorporation in the host country community. Existing research has shown this to be one of the best individual-level predictors of naturalisation (e.g. Bueker 2006: 132; Dronkers and Vink 2012: 404). Additionally, immigrants who are married and those who have children may also be more strongly motivated to acquire citizenship, as fulfillment either of their own life-course project, or that of their spouse and/or children (who may be left behind in the country of origin). Another important individual characteristic which can be assumed to positively affect the ability to qualify for citizenship is language competence. Jasso and Rosenzweig (1986: 305) observe that, for the USA, 'coming from a country in which English is an official language facilitates naturalisation, for which knowledge of the English language is a requirement.' Yang (1994: 468) confirms these findings and factors such years of residence, being married and having children, as well as speaking the language of the host country would be expected to be included in most micro-level investigations (e.g. Yang, 1994; [Chiswick and Miller, 2008](#); [Dronkers and Vink, 2012](#)).

Crucial determinants, in line with the literature, are socioeconomic factors such as human capital (educational attainment, occupational status) and employment status. There are two key reasons why one would expect that higher levels of human capital would increase the propensity to naturalise (Yang, 1994). First, as to human capital, as better-educated or more highly skilled persons are more likely to qualify for the type of public sector jobs for which citizenship may be a precondition, they are more likely to capitalize on this citizenship bonus and thus to invest in the naturalisation process. The same goes for employment: only those immigrants active on the labor market are likely to expect a return on their investment in the naturalisation process, for example in terms of wage increase. The second reason is related to the selectivity of the naturalisation process, which may deter immigrants who

decide not to bother investing in a procedure that looks very complex and is difficult to understand. Less educated or skilled immigrants may be deterred more easily by the seeming complexity of the naturalisation process. Hence, following both arguments, one would expect that immigrants with higher levels of human capital and employed immigrants are more likely to acquire the destination country citizenship. It is often hypothesised that 'social capital' also matters, for example in terms of immigrant networks and access to information on naturalisation procedures, but the evidence there is less systematic.

However, whereas most single-destination country studies have stopped here, logically looking only at the variation in the origin country citizenship policies of the immigrant population, particularly in a European context citizenship policy in the destination context is crucial. Citizenship policies set the conditions under which immigrants can naturalise, for example the required years of residence, the requirement to renounce one's previous citizenship, language and civic integration tests and fees. In Europe, we see large differences in terms of residence requirements, varying from three to twelve or more years (until 1999 even fifteen years in Germany) as well as fees, ranging from no costs whatsoever to nearly two thousand euro in Austria (Goodman 2010). Eligibility criteria such as residence requirements make the acquisition of citizenship a rather more or less realistic prospect within a foreseeable future. We expect that immigrants are more likely to acquire destination country citizenship in countries with a citizenship law that makes citizenship relatively accessible.

Aside from individual characteristics and legal requirements in the destination country, the legal framework set by the citizenship laws in the countries of origin and destination provides the opportunity structure with regard to access to citizenship. In the literature, most research has gone out to citizenship policy in the origin country, particularly with regard to the possibility of retaining one's previous citizenship when acquiring a new citizenship. Whether citizenship can be retained will depend on the combined outcome of the citizenship legislation in both the countries of origin and destination. In order to avoid conflicting allegiance or loyalties, many countries have a rule that implies the loss of the citizenship of origin upon the voluntary acquisition of another. Some countries also require immigrants to renounce their citizenship of origin, if they do not lose it automatically. In Europe, countries such as Austria, Denmark and Norway have a strict renunciation

requirement (Vink and De Groot 2011). This leads to the expectation that immigrants who can retain their citizenship of origin are more likely to acquire destination country citizenship. It should be noted, however, that the findings in the literature on this point are rather ambiguous as some studies which hypothesize a positive effect of dual citizenship toleration in the origin country, find in fact the opposite (see [Jones-Correa 2001](#); [Mazzolari, 2009](#); but compare Yang, 1994; [Dronkers and Vink 2012](#); [Logan et al, 2012](#)). Such contradictory findings are likely related to the differences in methodological design, for example with regard to sample size and definition of immigrant population (e.g. whether or not to include the second generation).

Third, with regard to dual citizenship policies, while the option to retain dual citizenship may be expected in general to affect the decision on whether to naturalise, one may assume that the absence of the dual citizenship option in particular affects immigrants from highly developed countries. After all, not only are immigrants from less developed countries in general more motivated to naturalise, thus more willing to accept the potential cost of breaking off the legal link with the country of birth, but those from more developed countries also have more to lose, so to say, in terms of the value of citizenship. It would thus be intuitive to expect a stronger positive relation between dual citizenship tolerance and naturalisation among immigrants from highly developed countries.

Citizenship of origin and the naturalisation premium

The relation between naturalisation and the economic integration of immigrants has received increasing scholarly attention since Chiswick's (1978) seminal study of the effects of citizenship acquisition on earnings of foreign-born men in the US. In as far as a 'citizenship premium' is observed in the literature, with regard labour market performance of immigrants, the main reasons are seen as threefold: a) *unrestricted access* to the labour market: citizenship may be a requirement for certain jobs, particularly in the public sector; b) *better employability*: the absence of administrative costs associated with work and residence permits makes it easier to hire naturalised immigrants; and c) citizenship acquisition as a *signalling device* of integration: naturalisation indicates a clear commitment of the immigrant to remain in the country of residence, hence lowering the uncertainty of the employer, and formal equality also decreases (though does not prevent) the risk of discrimination (Liebig and von Haaren, 2011).

In addition to methodological debates already referred to above (on disentangling causal mechanisms, what is clearly missing in this debate is the answer to the question how the relation between naturalisation and labour market performance is affected by the retention or renunciation of the citizenship of origin. While there is some limited work on the relation between dual citizenship and sociocultural integration and political participation (e.g. [Staton et al 2007](#); Dagevos 2008; Ersanilli and Koopmans 2010), there is virtually no literature on the relation between dual citizenship status and socioeconomic integration. Even the work by Mazzolari (2009: 187), which focuses specifically on the issue of dual citizenship and labour market performance, frames positive correlations between dual citizenship and labour market success mainly as a naturalisation effect: ‘Immigrants coming from countries that have recently allowed dual citizenship are found not only to be more likely to naturalise but also to experience relative employment and earnings gains and to lower their reliance on welfare.’ In other words, Mazzolari compares naturalised immigrants with non-naturalised immigrants, but does not compare naturalised immigrants *with dual citizenship* with naturalised immigrants *without dual citizenship* (cf. Liebig and Von Haaren 2011: 30). This lacuna in the literature is problematic because there are at least two contrasting views imaginable on the role of dual citizenship in the relation between naturalisation and economic integration. Since there are no well-developed systematic positions on this relation, such views at best have proto-theoretical status.

The first view, which is in fact the mainstream view in the literature on naturalisation and economic integration, is what we would term an *assimilationist perspective* on dual citizenship and naturalisation. Classically, assimilation is seen as a process by which immigrant groups fully integrate themselves into a new country, ranging from cultural assimilation to structural assimilation ([Gordon 1964](#)). Since the move to obtain citizenship indicates a commitment to stay in the destination country and requires a minimum of acculturation, this may be seen as an indicator of assimilation (White, Biddlecom and Guo 1993: 99).

From this assimilation perspective, the acquisition of citizenship of the destination country is thus an important step on the way to the civic and structural assimilation into the institutions of the host society. While naturalisation may not fully overcome the disadvantageous situation immigrants often find themselves in, caused by racial discrimination, language difficulties or cultural habits which set off immigrants against the

native population, it is deemed to narrow the employment gap between immigrants and natives by making the first similar to the latter in terms of legal status. Moreover, in terms of signalling towards employers, the key ‘citizenship’ question is often seen as whether an immigrant has destination country citizenship or not (see e.g. OECD 2011). Keeping the origin citizenship is seen as irrelevant from this perspective as neither access to public sector jobs nor access to the territory are usually conditioned on the renunciation of another citizenship. This view also chimes with transnationalist perspectives, which endorse the idea that multiple forms of membership are a reality in a mobile world (e.g. [Spiro 2007](#); [Portes 1999](#); [Naujoks 2013](#)). In other words, what matters for the employability of an immigrant is having destination country citizenship, not origin country citizenship.

In contrast with such a narrow perspective that only considers the relation between citizenship and integration from a destination country perspective, negative views on dual citizenship are frequently to be found among politicians and voters, especially in countries such as the Netherlands where this is a politicized issue ([Schmeets and Vink 2011](#)). In such a critical view, dual citizenship is essentially seen as a signal of the ambiguous status of an immigrant who is being caught between the contexts of the ethnic group and that of the destination country. In some ways, views that emphasise the ‘disintegrative’ consequence of dual citizenship, in the sense of persisting group ties that can negatively impact the integrative potential of assimilation forces such as education, work and arguably also citizenship, could be seen in line with segmented assimilation theory ([Portes and Zhou 1993](#); [Zhou 1997](#)). More forcefully even, by holding on to their ‘exit option’ of a second citizenship dual citizens are viewed by opponents as those who could never be as fully ‘integrated’ as those who have made a conscious choice for their new country and rejected the formal link with the country of origin.

While one can see how this ambiguity of dual citizens could play out in different ways, especially as regards political participation and sociocultural integration (see eg [Staton et al 2007](#), for a critical view), such a position is difficult to hold specifically with regard to naturalisation and employment, which has been the focus of much of the ‘citizenship premium’ literature. After all, the retention of citizenship of origin is unlikely to affect the employability of immigrants in terms of formal requirements (with the possible exceptional cases of higher political offices that may be excluded in some countries to dual citizens). Also the argument that dual citizenship would undermine the ‘signalling’ effect of

naturalisation is difficult to make, as then we would have to assume a) that employers systematically have information on dual citizenship status of applicants and, if so b) that they view this negatively; both assumptions are unrealistic from our point of view.

Does this mean we should not expect to observe a negative relation between dual citizenship and employment status? One reason to think so is that immigrants in principle can be assumed to want to retain their citizenship of origin, when they naturalise; but they may make a choice, when forced to do so because of the citizenship policies in the origin country (provisions of loss of citizenship) or the destination country (renunciation requirement). One could thus hypothesise that immigrants who naturalise despite having to renounce their citizenship of origin are ‘positively selected’ into naturalisation under the assumption that unless they are required to do so, immigrants would normally not renounce their origin citizenship. These immigrants can be expected to be extra motivated to naturalise and, thus, have (unobservable) characteristics related to personality and life situation that may make them perform better on the labour market. In other words, if such a ‘positive selection’ mechanism were to exist, one would expect to find empirically that immigrants who do naturalise, despite losing or having to give up their previous citizenship, will be those who can be associated with better integration outcomes. Crucially, however, this would not imply that dual citizenship is a barrier to integration; rather, it would mean that dual citizenship rules –in origin and destination countries- significantly impact the payoff structure and thereby the integration outcomes associated with naturalisation.

5. Dual citizenship

This section discusses two case studies that illustrate the previous methodological and theoretical discussions. The first case study discusses the impact of dual citizenship policies on immigrant naturalisation rates in destination countries, based on the results of a comparative study in 16 European countries. The second case study introduces data from a new ‘global expatriate dual citizenship database’ (Vink, De Groot and Chun 2015), which collects information on dual citizenship policies in all countries of the world since 1960. It discusses how origin countries have evolved in their citizenship policies vis-à-vis the diaspora.

Assessing the impact of (dual) citizenship policies on immigrant naturalisation rates

This section summarizes the results of a recent comparative study by Vink, Prokic-Breuer and Dronkers (2013) on the effects of citizenship policies in European countries on the propensity to naturalise, taking into account not only characteristics of individuals, but also their origin country features. In particular, the study looks at the relevance of destination country policies *in the context of origin country features*, such as the level of development of the origin country, as well as dual citizenship policies. The study is based on a sample of 7.489 foreign-born residents in 16 European countries, collected by the European Social Survey. The study is innovative because, in as far as any comparative research has been done on the effects of destination country policies, these have concluded that indeed ‘policy matters’ (Bloemraad 2002; Reichel 2011; [Dronkers and Vink 2012](#)). However, so far no research has been done on the question *to whom* citizenship policy matters more.

[Vink et al \(2013\)](#) hypothesise that the inclusiveness of citizenship policy matters in particular to those immigrants who are strongly motivated to naturalise, primarily those immigrants coming from less developed countries. After all, whereas the first group has a ‘valuable’ citizenship to fall back on and will thus continue to have a viable return option, the latter is likely to see citizenship acquisition as part of a life course project aimed at permanent settlement in a new country. While this need not necessarily rule out the idea of return to the home country, acquiring citizenship of the destination country is likely to be perceived as a key precondition for such return to the origin country, given that citizenship guarantees continuous mobility. Hence, these immigrants will be affected more significantly by policies which make destination country citizenship either not accessible within a reasonable period after arrival in the country due to prohibitive residency requirements or difficult or even impossible to acquire due to prohibitive and discretionary assimilation requirements.

[Vink et al \(2013\)](#) find that the level of development of the country of origin is a crucial factor in understanding the relationships between on the one hand citizenship policies and on the other individual-level features and citizenship take-up rates in Europe. To arrive at this conclusion, the analysis first shows that demand for citizenship is influenced primarily

by where immigrants are from. The level of human development of countries of origin accounts for the vast difference among immigrants in their propensity to naturalise. Immigrants in Europe coming from medium and under-developed countries are on average 2.5 times more likely to have citizenship than those originating from highly developed countries, including EU member states and other OECD countries. These findings are in line with the literature and can be understood in terms of the perceived payoff attached to citizenship. Acquiring destination-country citizenship has a much higher potential pay-off for immigrants originating from low-income countries than for those coming from developed and more prosperous societies. In this context, securing residence status in a country which offers a vast increase in security and life chances, is of crucial importance.

Crucially, because large differences exist between immigrants in their motivation to naturalise, [Vink *et al* \(2013\)](#) show that the impact of citizenship policies varies for these two groups. The legal framework set by the citizenship laws in the countries of origin and destination accounts for a difference in naturalisation rates, yet only for immigrants from less developed countries. In fact, not only are these immigrants twice as likely to naturalise in countries with very open citizenship policies, but they are also the ones particularly affected by these policies. [Vink *et al* \(2013\)](#) demonstrate the relevance of policy by introducing an indicator that captures the openness of citizenship policy in the destination countries for first generation immigrants, with regard to residency and integration requirements for naturalization (MIPEX Access to Nationality). They observe that an increase of 1 unit on the MIPEX scale leads to a 2.4 percent increase in the likelihood of having destination country citizenship. However, only in the case of immigrants from under-developed countries do they observe a sharp increase in citizenship take-up rates. For immigrants from highly developed countries the positive relation between citizenship policy and naturalization rates is weaker and not significant.

Second, the analysis by [Vink *et al* \(2013\)](#) shows that this origin factor is also related to the role of individual characteristics in immigrants' decisions to naturalise. Differentiated analyses of citizenship take-up among two immigrant groups, from highly developed (incl. the EU) and from medium/under-developed countries, show that different determinants play a role for different groups. Socio-economic features such as human capital (e.g. language skills) and employment status indeed play significant roles in the take-up of citizenship, but only for immigrants from less developed countries. Historical and cultural

ties between the origin country and the destination country also matter, for example in the context of former colonies.

These findings match with those of [Jones-Correa \(2001\)](#), for example, who demonstrates that changes in citizenship policies in Latin American countries in the 1990s had a positive effect on naturalization rates among immigrants groups in the US from countries that recently allowed dual citizenship. Peters, Vink and Schmeets (2015) find that in the Netherlands migrants from countries that do not allow for dual citizenship status are about 24 percent less likely to acquire citizenship of the destination country, indicating that the renunciation requirement is considered a significant obstacle to naturalization. However, they find significant differences between how these dual citizenship policies affect various migrant origin groups and cohorts (see also Bevelander and Helgertz 2014 for some contrasting findings on the relevance of dual citizenship policies of origin countries).

Charting dual citizenship policies worldwide in the last 50 years

The relevance of dual citizenship thus needs to be understood in this context of differentiated naturalisation dynamics. In Europe, migration-receiving countries are increasingly unlikely to demand the renunciation of previous citizenship as a condition for naturalisation (Vink and De Groot 2011; updated in Vink and De Groot 2016). This has to do with the fact that, in a world of migration where children of mixed-nationality couples increasingly often have dual citizenship at birth, it makes increasingly less sense to require from a specific group of immigrants that they renounce their citizenship of origin, when they naturalise. By 2010, of all EU member states, Austria, the Czech Republic, Denmark and Estonia are the only countries which still have an uncompromised renunciation demand in their citizenship legislation. Since the early 1990s, countries such as Italy, Finland, Luxembourg and Sweden abolished the renunciation demand altogether. Other countries, such as the Netherlands, currently allow for so many exceptions to the general rule that most naturalised citizens do not have to renounce their previous citizenship (De Groot and Vink 2008; Van Oers et al. 2006: 419). The new German naturalisation regime is also significantly more tolerant towards double citizenship than was previously the case, though still generally restrictive with regard to dual citizenship of specific categories of immigrants, as well as for the children of immigrants who can acquire German citizenship

at birth but still have to make a decision between German and foreign citizenship between the age of 18 and 23 (Hailbronner 2006b: 232). Spain formally has a renunciation demand but does not enforce it (Chopin 2006: 251).

The attitudes towards dual citizenship of emigrants are perhaps most clearly manifested by the rules that exist in states with regard to the loss of citizenship after a citizen voluntarily acquires the citizenship of another state. Basically, countries can be divided in three categories, depending on the type of general rule they apply (though, admittedly, bilateral agreements between countries may provide different rules for specific groups). Traditionally, in many states dual citizenship was perceived negatively and such states provide accordingly in their national legislation that citizenship is lost automatically upon the voluntary acquisition of another citizenship. By contrast, in states where dual citizenship is not perceived to be problematic, no such rules on loss of citizenship exist though citizens are allowed to voluntarily renounce their citizenship. Thirdly, in a minority of states, citizenship is not automatically lost and renunciation is also not possible.

Table 1: Rules on consequences of voluntary acquisition of another citizenship for the citizenship of origin country, by world region in 1960 and 2015 (percentage of states per world region applying a specific rule)

	Automatic loss origin country citizenship	No automatic loss, but renunciation possible	No automatic loss, no renunciation possible	N	Automatic loss origin country citizenship	No automatic loss, but renunciation possible	No automatic loss, no renunciation possible	N
	1960	1960	1960	N	2015	2015	2015	N
Africa	71.4%	14.3%	14.3%	7	35.2%	55.6%	9.3%	54
Asia	54.5%	40.9%	4.5%	22	33.3%	62.5%	4.2%	48
Europe	54.8%	41.9%	3.2%	31	27.3%	70.5%	2.3%	44
Americas	72.7%	4.5%	22.7%	22	8.6%	60.0%	31.4%	35
Oceania	66.7%	33.3%	0.0%	3	15.4%	84.6%	0.0%	13
<i>Mean</i>	<i>61.18%</i>	<i>29.41%</i>	<i>9.41%</i>		<i>26.80%</i>	<i>63.40%</i>	<i>9.79%</i>	
N	52	25	8	85	52	123	19	194

Source: Vink et al (2015)

Vink, De Groot and Luk (2015) have charted these rules for all countries in the world, since 1960. This novel dataset provides a unique overview of the development of origin country citizenship policies over the last half century. In 1960 in 61 percent of countries the voluntary citizenship of another country implied the automatic loss of the citizenship of origin. In 2015, however, only 27 percent of countries globally still applied such loss of citizenship provisions (see Table 1). This trend is especially strong within the American content, where by 2015 only 9 percent of countries still applies a rules of automatic loss of origin citizenship upon the voluntary acquisition of another citizenship.³ These changing rules clearly reflect a different approach towards dual citizenship, an evolution that is linked to the desire of migration countries of origin to maintain the links with the emigrant community (Jones-Correa 2001; see for further analysis of these data: Vink *et al*, 2016).

Do these dual citizenship rules matter? For that question we go back to the analysis by Vink, Prokic-Breuer and Dronkers (2013), who show that dual citizenship policies do matter. Immigrants who can retain their citizenship of origin are 40 percent more likely to acquire destination country citizenship. These results are controlled for individual factors such as gender, age, education and years of residence, as well as other origin countries (e.g. Human Development Index and whether immigrants come from former colonies or territories) and destination country features (GDP per capita and citizenship policy). However, there is no empirical support for the intuitive hypothesis that dual citizenship matters more for immigrants from highly developed countries than for those from less developed countries. The latter in general have a significantly higher propensity to naturalize, but this does not seem to be affected particularly by dual citizenship policies.

6. Conclusions

To conclude, immigrants coming from highly developed countries are not only less likely to naturalise, but whether or not they do so seems to depend on few factors. The strongest impact on immigrant naturalisation rates is clearly from ‘origin country effects’, especially in terms of relative levels of economic development, political stability and – in the case of EU member states – whether immigrants come from outside the European Union. If

³ However, in more than 30 percent of countries in the Americas individuals are not allowed to renounce their citizenship, even if they choose to do so.

immigrants from highly developed countries or other EU member states naturalise at all, then years of residence play a crucial role in the process. For these immigrants, socio-economic and demographic features play only a marginal difference in their decision to naturalise, compared to the relevance of the time spent in the country of destination. In other words, not only does it matter where an immigrant is from, in terms of his or her propensity to naturalise, but it also matters significantly where an immigrant goes, in terms of the institutional context of the citizenship policy in the destination country. However, crucially, while destination country citizenship policies clearly affect naturalisation rates among immigrants, their relevance is conditioned by the kind of origin country background of the immigrants involved. Thus the question of how much where one goes matters with respect to naturalization depends significantly on where one is from.

The chapter raises two strands of issues relating to the actions and strategies of *actors* in origin countries which could affect migrant integration in destination countries.

First, dual citizenship policies, which are understood as the constellation of destination and origin country rules, affect the propensity to naturalise across the board – though within the context that the motivation to naturalise also depends on other factors related to the socioeconomic background of the origin country, as well as to individual-level factors. Thus, one could say that the impact of ‘origin country policies’ interacts with the impact of ‘origin country effects’. From this perspective, the actors in the countries of origin who can most directly affect the integration of migrants in destination countries, with respect to the acquisition of citizenship, are the national legislators, who regulate what happens when an immigrant voluntarily acquires another citizenship – especially in the origin countries from which migrants are most interested in acquiring destination country citizenship. The summary results of a worldwide survey presented in this chapter clearly demonstrate that these actors in the origin countries increasingly accept dual citizenship as a natural phenomenon in an increasingly transnational world and thus abandon previously restrictive rules. At the same time, there are still a significant number of states in the world, albeit a clear minority, where the phenomenon of dual citizenship is still actively countered through restrictive citizenship rules. These changing attitudes towards dual citizenship could be probed further through a survey of country of origin legislators and diaspora interest groups, in a diverse geographical, socioeconomic and legal context.

Second, following up on the previous point, the chapter highlights a major issue which has so far received relatively little attention, at least in the surveyed literature on citizenship acquisition and the socioeconomic, political and sociocultural integration of migrants in destination countries: namely, the relevance of retaining origin country citizenship to naturalisation and immigrant integration. In much of the economically oriented literature, the default assumption seems to be one of assimilationism: destination country citizenship, not origin country citizenship supports integration. However, apart from affecting migrants' propensity to naturalise, dual citizenship rules in origin countries by definition also affect the continuing relationships of naturalised migrants after they have acquired destination country citizenship. How do these continuing ties with the origin country, whether expressed in a legal status or not, affect migrants' integration in the destination country? Apart from the occasional case studies of specific destination and origin country constellations (e.g. between Mexico and the US, see Fitzgerald 2008), there is relatively limited systematic evidence which shows how origin country citizenship affects what is often seen as a 'citizenship premium' in destination countries. Moreover, in a related manner, even if origin countries broadly accept dual citizenship through their citizenship legislation, a wide variety of diaspora politics is foreseeable in terms of efforts by government officials who are linked to diplomatic representation; they may reach out to the emigrant community to either stimulate or discourage them to naturalise in the destination country. By keeping a formal link with the origin country, citizenship policy is often seen as an important tool to maintaining ties with the economically significant diaspora. Such politics may or may not interfere in migrants' integration process in the destination country. Hence, even if legislators broadly accept dual citizenship for the pragmatic reason of keeping the emigrant community's bond with the home country alive, how do they view this continuing legal bond in terms of political, social and economic obligations, both of the country of origin and the individual migrant? And, how do individual migrants view these continuing legal ties to the origin country?

While the viewpoint that citizenship can serve as a tool for integration is increasingly accepted in academia as well as in national politics – now that citizenship policies in origin countries have become increasingly tolerant towards dual citizenship in Europe and beyond, as demonstrated in this chapter – there is a self-evident relevance to further exploring how maintaining origin-country citizenship interacts in the citizenship-integration nexus in the destination context. The role of relevant actors in countries of origin, such as

legislators and diaspora group representatives, will be crucial to understanding how this interaction plays out across various constellations of countries of origin and destination.

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