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Judith Saurer¹

The Acquisition of Citizenship in the OECD countries

Citizenship is a key matter for immigrants and their host countries alike. For the latter, the question is when and under which conditions it is appropriate to grant citizenship to the immigrant population. For the immigrants, however, the question arises as to whether it is worthwhile to fulfill these requirements and apply for citizenship. Since granting citizenship is considered a part of integration policy in most countries, economic literature focuses mainly on the effect of citizenship in closing preexisting socio-economic gaps between immigrants and natives. Studies by Chiswick (1978), Brantsberg et al. (2002), Gathmann and Keller (2014) and many other authors find positive effects on the integration of immigrants on the labour market. Recent literature also focuses on the specific integration policy of granting birthright citizenship – granting children of immigrant descent citizenship at birth in the host country. Avitabile et al. (2015) and Felfe et al. (2016) find positive socio-economic effects of granting birthright citizenship on children and their families.

ACQUISITION OF CITIZENSHIP

Table 1 shows absolute numbers of naturalisations and naturalisation rates in 2014 for the OECD countries. There are substantial differences between the countries. Some of the countries have only a low number of granted citizenships given the size of their foreign population, like Austria, Estonia and the Slovak Republic, with less than 1 percent of the foreign population being granted the citizenship of the host country. Other countries like Hungary, Poland and Sweden grant over 6 percent of their foreign population the citizenship of the host country. Typical immigration countries like the US, Australia and New Zealand have a similar naturalisation rate of three percent.

There are several ways to grant citizenship to foreigners, with an important distinction to be made between granting citizenship to children and granting citizenship to adults. For children we can differentiate between *jus sanguinis* (right by blood) and *jus soli* (right by soil). Naturalisation requirements for adults mostly depend on the time spent in the host country and vary quite substantially across countries.

ACQUISITION OF CITIZENSHIP FOR CHILDREN OF MIGRANT DESCENDANTS

All countries in the world have a *jus sanguinis* provision. This means that children who have at least one parent holding citizenship of that country are automatically granted citizenship. There are exceptions in some countries if parents are not married and only the father holds the citizenship of the country. Other countries, like Italy, also grant citizenship if only the grandparents hold Italian citizenship.

The other much-discussed way for children to acquire citizenship is the '*jus soli*' approach, which literally means law by soil and indicates that a child is granted citizenship of the host country just by being born in the country. This practice is most commonly found in traditional immigration countries like the US or Canada. Some countries, like Germany or Greece, however, attach further conditions to granting citizenship based on *jus soli*. Usually these are related to a minimum duration of stay of the parents in the host country varying between five and eight years. Other countries, like Hungary, Italy, Poland and Iceland, only

Table 1
Naturalisations in the OECD Countries in 2014 for Foreign Born Population

	Naturalisation in absolute numbers	Naturalisation rates
Austria	7570	0.7
Belgium	18727	1.5
Czech	5114	1.2
Denmark	4747	1.2
Estonia	1614	0.8
Finland	8260	4.0
France	105613	2.5
Germany	108422	1.4
Greece	29462*	3.8
Hungary	8745	6.2
Ireland	21090	3.8
Italy	129887	2.6
Luxembourg	4991	2.0
Netherlands	32578	4.0
Poland	3792**	6.8
Portugal	21124	5.3
Slovak	233	0.4
Slovenia	1262	1.1
Spain	93714	1.9
Sweden	43510	6.3
UK	125653	2.5
Iceland	595	2.6
Norway	15336	3.2
Switzerland	33325	1.8
Turkey	9216***	5.3
Australia	162002	2.5****
Canada	114573*	5.9
Japan	9277	0.4
New Zealand	28757	2.7****
USA	653416	3.0

* Data from 2013. ** Data from 2012. *** Data from 2011. **** Percentage of foreign-born population.

Source: International Migration Outlook 2016, OECD.

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Table 2

Naturalisation Provisions for Immigrant Children in the OECD Countries

	Jus sanguinis	Jus soli	Conditions jus soli	Since
Austria	x			
Belgium	x	x	Parents live 5 years in Belgium within 10 years before birth	2013
Czech Republic	x	x	Only if parents have no citizenship	
Denmark	x			
Estonia	x			
Finland	x			
France	x	x	At least one parent is born in France	
Germany	x	x	At least one parent has legally resided for 8 years in Germany	01.01.2000
Greece	x	x	Parents live 5 years in Greece	
Hungary	x	(x)	Only if the child would be without any citizenship	
Ireland	x	x	Link to Ireland --> 3 out of 4 years in IR; or one parent is British	01.01.2005
Italy	x	(x)	Only if the child would be without any citizenship	15.08.1992
Luxembourg	x			
Netherlands	x			
Poland	x	(x)	Only if the child would be without any citizenship	
Portugal	x	x	Of one parent is born in Portugal and lives there	
Slowak Republic	x	(x)	Only if the child would be without any citizenship	
Slovenia	x			
Spain	x	x	Either parent born in Spain	
Sweden	x			Jus sanguinis: 01.04.2015
UK	x	x	One parent lives in the UK or works in the British armed forces	British Armed Forces: 13.01.2010
Iceland	x	(x)	Citizenship at 18 years old	
Norway	x			
Switzerland	x			
Turkey	x	(x)	Only if the child would be without any citizenship	
Australia	x	x	One of the parents has to reside permanently in Australia, or the child receives citizenship when it was born there at age 10.	20.08.1986
Canada	x	x		
Japan	x	(x)	Only if the child would be without any citizenship	
New Zealand	x	x	One of the parents lives in NZ permanently	01.01.2006
USA	x	x		

Source: Own collection of data from governmental websites.

grant birthright citizenship if the child would not have any other citizenship.

In the last couple of years several studies have analysed the effect of jus soli citizenship on the integration of parents and their children who received citizenship. The authors of the studies document positive effects of birthright citizenship on the length of stay and integration efforts of immigrant children's parents (Avitable et al., 2013, 2014; Sajons, 2014). Far less understood are the direct consequences for immigrant children themselves. A first study by Felfe et al. (2016) finds positive effects on the introduction of birthright citizenship on the children and their educational efforts.

NATURALISATION OF ADULTS

Adults can also obtain citizenship of a host country. Normally they have to fulfill several requirements before being granted citizenship. All OECD countries have a minimum duration of stay requirement, which varies across countries from five to 12 years (for spouses, refugees and associate countries there are potential reductions in the required length of stay). This ensures that individuals have at least some links to

the host society and that they are willing to stay in the country for a longer period of time.

The proof of language proficiency is an important part of most naturalisation requirements. Host countries want to make sure that the new members of the society speak the host countries' languages at least rudimentarily. However, there are differences in the language level they require. Some countries ask for a European A2 certificate, others a B1 or a B2 certificate.

A further requirement that many countries impose on applicants to gain citizenship is being self-supportive. Five countries (Slowak Republic, Turkey, Japan, New Zealand and the U.S.) conduct language tests during their naturalisation processes. This precondition also varies across the OECD countries. Some countries require that applicants live on their own income, others allow for subsidies. Likewise, the time that individuals have to be self-supportive before applying for citizenship varies across countries: between three out of five or eight years. The requirement of being self-supportive can give the host country the confidence that individuals do not apply for citizenship in order to obtain social transfers.

A further important issue is whether countries allow dual citizenship. If dual citizenship is not allowed, the applicant must renounce his/her previous citizenship when applying for the citizenship of the host country, which might impose both monetary and non-monetary costs on the applicant. Countries do not only regulate whether they allow dual citizenship or not, but also which nationals of which countries might be allowed to keep a second nationality. For example, in the European Union, citizens of most of the countries are allowed to keep their citizenships when obtaining the citizenship of another European Union member country. For example, while Germany does not allow dual citizenship in general, it allows it for citizens of EU member states.

POLICY CONTEXT

Holding citizenship is seen as the final step in an immigrant's integration process. However, as the literature shows, it also has the potential to further integrate immigrants in the host country through several channels. First, citizenship is a basis for political and professional equality and thus for successful long-run integration in the host country. Hence, it is likely to enhance immigrants' future labour market opportunities and increase their families' likelihood of staying in the host country (Sajons, 2010). As a result, immigrants may decide to invest in host-country-specific human capital by, for instance, increasing their use of the local language, developing a network of native friends or adopting cultural habits (Avitable et al., 2013; Sajons, 2012). Second, the educational investment decisions of immigrant parents into their children might also differ, by adopting the decisions of natives. In addition, children themselves may put forth more effort in school and form closer ties to their native peers once they are aware of the benefits of citizenship. Third, citizenship may reduce discrimination by peers or local decision makers (e.g., teachers or school principals) and employers.

Obtaining citizenship offers the opportunity for the foreign-born population and their offspring to become a more integrated part of the host society. Giving more immigrants the opportunity of becoming citizens in a host society and fostering their integration process at relatively little cost is ultimately a policy decision.

Table 3

Naturalisation Provisions for Adults in the OECD Countries

	Length of stay	Self-Supportive	Language	Dual citizenship
Austria	10 years	x	B1	x
Belgium	10 years	x	A2	x
Czech Republic	5 years	x	B1	x
Denmark	9 years	x	B2	
Estonia	8 years	x	B1	
Finland	5 years		B1 (Finnish or Swedish)	x
France	5 years	x	B1	x
Germany	8 years	x	B1	x
Greece	7 years	x	A2	x
Hungary	8 years	x	B1	x
Ireland	5 out of 9 years	x		x
Italy	10 years	x		x
Luxembourg	7 years	x	A2/B1	x
Netherlands	5 years	x	B1	
Poland	10 years	x	B1	
Portugal	6 years	x	A2	x
Slovak Republic	8 years	x	test	x
Slovenia	10 years	x	B1	x
Spain	10 years	x	A2	x
Sweden	5 years	x		x
UK	5 years		B1	x
Iceland	7 years	x		x
Norway	7 years	x	x	
Switzerland	12 years		A2/B1	x
Turkey	5 years	x	test	x
Australia	4 years		B1	x
Canada	4 out of 6 years		A2	x
Japan	5 years	x	test	
New Zealand	5 years		test	x
USA	5 years		test	x

Source: Own collection of data from governmental websites.

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