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**Article**

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## Dual Citizenship in the EU

While debates about dual citizenship are common today, this was not the case until recently. Even during the Cold War, dual citizenship was largely regarded as unacceptable. Citizenship was a binding pact representing one's political loyalty to a nation state. A dual citizen would be disloyal by default because of competing allegiances. Most states declared dual citizenship to be illegal. Anyone who wanted to acquire a new citizenship would have to renounce their old one. In cases in which dual citizenship was unavoidable, the person in question would have to choose which nationality s/he wanted to keep upon reaching legal adulthood.

Opposition to dual citizenship was not just a question of political adherence and identity – states also wanted to protect their own authority. Citizenship was supposed to be the ultimate contract between the government and the governed. This contract would be violated by dual citizenship; for example, a citizen could claim to be a foreigner when it came time to register for the draft. A dual citizen could also try to receive benefits from two states. Many believed that dual citizenship would make it much more difficult for the state to maintain authority over its citizens (Faist et al. 2004).

After the Cold War, however, attitudes towards dual citizenship liberalised. This was largely due to two trends: increasing gender equality and many states' decision to abolish mandatory military service. Gender equality and dual citizenship are closely related because it used to be that as soon as a woman married, she would have to give up her own citizenship for the citizenship of her husband. Not only did this force women to give up their citizenship of origin, it also complicated matters for children who were born out of wedlock who then needed their fathers to recognise them in order to receive any kind of citizenship at all. However, the Convention on the Nationality of Married Women run by the UN in 1957 marked a major shift in perceptions because many states then agreed that women should not have to give up their citizenship upon marriage. This was reinforced by the European Convention on Nationality of 1997 (Faist 2004). These new laws greatly increased the number of children eligible for dual citizenship. They stipulate that if both parents are citizens of different countries that both allow for citizenship by birth, then their children are automatically eligible for dual citizenship.

The European Convention on Nationality in 1997 marked a shift in approach among European states

with regards to citizenship in other ways too. It required states to implement a path towards naturalisation and to more deeply consider the nationality of spouses, children born abroad or adopted, and many other cases when writing laws on citizenship. It also granted states the right to take citizenship away from their own citizens if they applied for a different citizenship or if they performed military service (Faist 2004). Conscription was a frequent reason for many states to deny dual citizenship. Dual citizens were expected to serve in their country of residence, but if that country differed from that of their citizenship, their citizenship could also be revoked. As conscription became less common, fewer dual citizens would have to give up a citizenship because they probably would not have served in the military. Due to these different trends, more children have become dual citizens because they are eligible for the citizenships of both parents. This has become especially true as the world becomes more connected and international trade and relationships continue to multiply.

Attitudes towards citizenship itself have also changed. Instead of being seen as a contract between a state and its people, citizenship is now seen as a human right. The UN Declaration of Human Rights stipulates that everyone has the right to nationality. Dual nationality can be seen as a way to prevent statelessness and to protect nationality as a human right, as well as an important part of peoples' identity (Vink and de Groot 2010). As immigration continues, many think that the option of dual citizenship will help immigrants to integrate more fully. As for the future of citizenship itself, some scholars are proponents of transnationalism, saying that the emergence of a growing number of dual citizens will loosen restrictions on dual citizenship. Supporters of post nationalist theory think that the nature of citizenship itself will change as the relationship between the state and the citizen continually evolves (Bloemrad 2004).

### PROS AND CONS

Despite dual citizenship becoming more common, it is a topic that remains heavily debated. This report will look at the different attitudes towards dual citizenship in the various European Union member states and how they have changed in the last 55 years.

Proponents of dual citizenship think that it creates good opportunities for immigrants to integrate politically as well as socially. Many immigrants often still feel tied to their country of origin and are therefore reluctant to give up their citizenship of origin. Dual citizenship allows them to live out their different national identities without having to choose one over the other. By being given all of the rights of a citizen, immigrants also do not feel like a second-class citizen (Faist et al. 2004). Some studies have also shown that dual citizenship increases the number of immigrants who choose to naturalise in their country of residence (Vink and de

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Groot 2010). All in all, dual citizenship might be able to bolster immigrants' integration into their new country and the EU.

However, dual citizenship is not without flaws. Many worry that those with dual citizenship may take advantage of their status to double vote. In the EU, this worry is especially acute because a citizen of France and of Italy, while legally able to take part in both local elections, could also illegally vote twice in EU elections. States may also have to worry about a lack of loyalty. If many individuals end up with two citizenships, those people may not be as loyal or dedicated to their home countries (Faist et al. 2004).

**DUAL CITIZENSHIP IN THE EU**

In the EU itself, there are significant differences in attitudes towards dual citizenship based on country. Northern Europe, which traditionally receives many immigrants, has been historically more focused on integration, whereas Southern Europe is more occupied with sustaining a relationship with its many emigrants.

One of the important factors in the dual citizenship debate is the interaction of citizenship by blood or by birthplace. Generally, most countries have jus sanguinis, or citizenship by blood, in which parents pass down their citizenship to their children, or jus soli, which means that anyone who is born within the country's territory automatically becomes a citizen. Most European countries have citizenship laws in which citizenship is given by birth, meaning that children can obtain the citizenship of their parents. However, jus soli is seen as an important way of measuring openness towards immigrants and potential dual citizens. In the table below, stances towards citizenship by birthplace and dual citizenship are outlined for 25 of the 28 EU member states.

It is important to note that although countries can regulate the naturalisation of spouses in international marriages by demanding proof of renunciation, the real problem in terms of enforcement is with children. In the EU, all of the countries that allow for jus soli also allow dual citizenship to some degree. Therefore, countries that do not allow dual citizenship will also not allow citizenship by birthplace.

Another interesting observation to note when looking at this table: the Scandinavian countries as well as some Mediterranean countries, like Greece, Spain, Croatia, Italy and Malta don't allow citizenship by birthplace. In recent years, the number of those allowing dual citizenship has also increased continuously.

**POLICY DATA**

Because most countries only have data on their population and the number of naturalisations, it is rather difficult to assess how many dual citizens there are in the EU member states, let alone in the entire EU. How-

**Table 1**  
**Stances Towards Citizenship in 28 EU Member States**

Country	Citizenship by birth (jus soli)	Dual Citizenship
Austria	No	No
Belgium	Yes	Yes
Czech Republic	No	No
Cyprus	No	Yes
Denmark	No	No
Estonia	No	No
Finland	No	Yes – since 2003
France	Yes	Yes
Germany	Yes – since 2000	No – German-born children of foreigners are allowed to be dual citizens until 23, at which point they have to choose. Also, naturalised citizens still need to relinquish prior citizenship
Greece	No	Yes
Hungary	No	Yes
Ireland	Yes	Yes
Italy	No	Yes – since 1992
Latvia	No	No
Lithuania	No	No
Luxembourg	No	No
Malta	No	Yes
Netherlands	Yes	Yes – De facto practice of allowing naturalised citizens to keep their prior citizenship
Poland	No	No
Portugal	Yes	Yes
Slovenia	No	No
Spain	No	No
Slovakia	No	No
Sweden	No	Yes – since 2001
United Kingdom	Yes	Yes

Source: Howard (2005).

ever, there is a database created by Vink and De Groot (2015a, 2015b and 2015c) through the University of Maastricht and Harvard that compiles different policy changes related to dual citizenship. This data has many different sources which are listed on their website. They code for countries that takes the citizenship of origin of citizens who apply for a second citizenship, countries that don't automatically take the citizenship of those who apply for a second, but might require them to renounce it, and countries where dual citizenship is allowed.

The codebook of this data shows various policy approaches adopted by countries around the world to dual citizenship. Figure 1 presents an overview of some of these policy stances. The red line shows either the policies coded as 0 or 999, which means that the rules on loss of citizenship in the country aren't known. All policies in the 100s are marked in dark blue. Citizens of these countries will automatically lose their original citizenship when applying for a second citizenship. Variation within all policies accounts for whether the country in question supports the first chapter and/or the second protocol of the Strasbourg Convention. The

Strasbourg Convention was officially entitled the “Convention on the Reduction of Cases of Multiple Nationality and Military Obligations in Cases of Multiple Nationality” and was signed in Strasbourg in May 1963. The first chapter is entitled “Reduction of cases of multiple nationality” and describes different cases and ways in which dual citizenship can be avoided. The second protocol was signed in 1993 and reflects a change of perspective. It lists the growing number of immigrants, families that feature many different citizenships, and children born out of wedlock who have difficulty in obtaining citizenship as reasons for avoiding statelessness and trying to allow people to retain their citizenship of origin (in certain cases).

While the countries in the 100s do vary in terms of whether or not they accept the first chapter and/or the second protocol of the Strasbourg Convention; ultimately none of them allow citizens to retain their citizenship of origin. For the light blue line, which is an aggregation of policies in the 200s, people will not automatically lose their citizenship, but their country of origin might renounce their citizenship. In this case, attitudes towards dual citizenship are a bit more open. The data set also codes for countries in which people will not automatically lose citizenship of their origin country, and where the origin country will not renounce their citizenship. These policy stances are coded in the 300s, but they do not exist in the 28 European member states, and therefore are not present in Figure 1 (Vink and De Groot 2015).

The original data shows the various policy stances of all countries from 1960 to 2015. In order to create a legible graph, we only look at the current 28 member states of the EU. For each year, the data shows which percentage of member states fall under a certain policy category. This way, we can easily track the development different policy trends in the EU as a whole.

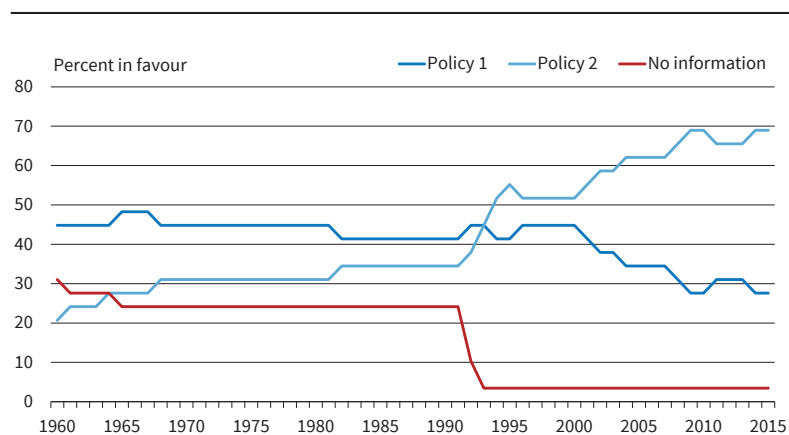
Looking at the data, we can see that far more data is available after 1992. Prior to that year, these countries did not have a clear policy towards dual citizenship. As of 1993, many more countries opted for more open policies and decided that when people applied for a new citizenship, they shouldn't

automatically lose their previous citizenship. This can be seen in the dramatic increase in the early 1990s, which plateaued a little in the late 1990s, but rose again throughout the 2000s. The early 1990s are an interesting focal point for observing this shift because the second protocol of the Strasbourg Convention was signed in 1993, which signals that many were reassessing how they felt about citizenship and wanted to find a way to better integrate immigrants and handle children with parents of different nationalities. In the same vein, the percentage of EU countries that adopted policies in which anyone who wanted a second citizenship would automatically lose their citizenship of origin decreased as of the early 2000s. In general, this data supports more qualitative research on the opening up of European governments to dual citizenship.

Figure 2 shows a small selection of countries to gain a better understanding of how the different regions of Europe changed in terms of policy. Poland and Greece are consistently more open to dual citizenship, with policies aimed at not forcing people to automati-

Figure 1

**Attitudes Towards Dual Citizenship in EU 28**

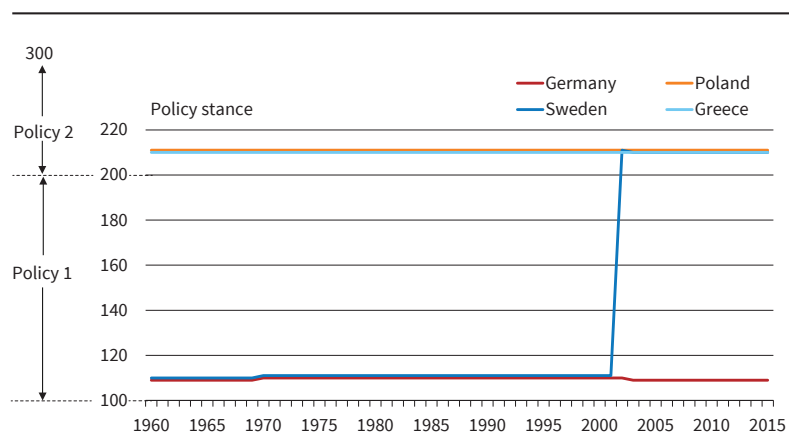


Source: Vink et al. (2015); authors' calculations.

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Figure 2

**Dual Citizenship Policies of Selected Countries**



Source: Vink et al. (2015); authors' calculations.

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cally lose their citizenship. Sweden used to be more restrictive but opened up to dual citizenship in the early 2000s, as did other Scandinavian countries. Germany, on the other hand, has been relatively closed to dual citizenship. It dramatically changed its laws in the 2000s and there are some exceptions to its ban on dual citizenship, but they are not coded for in the data, so Germany is shown as being closed to dual citizenship.

When looking at the data in terms of regions, one can also see that Eastern Europe largely supports the concept of a second citizenship, with the exception of the Czech Republic and Hungary, which are a bit more restrictive. Scandinavian countries were also generally more restrictive until the 2000s. The Mediterranean countries are mostly open to dual citizenship, except for Spain. In Western European countries, attitudes tend to vary, while the Baltic countries are generally relatively closed, except for Latvia in the 2000s.

### EU CITIZENSHIP AND THE FUTURE OF DUAL CITIZENSHIP

As for the future of dual citizenship in the European Union, it should be noted that all citizens of EU member states are already dual citizens, because they are citizens of their member state, as well as of the EU. EU citizenship allows people to vote in EU elections, travel freely, and run for office, among other rights. Many EU member states have also allowed dual citizenship if, and only if the new citizenship comes from a country that is also an EU member state. In 1993, Belgium, France, Greece, Italy, Ireland, Portugal, the UK and Germany all passed laws that were exceptions to their ban on dual citizenship, allowing their citizens to acquire a second citizenship if it was that of another EU member state (Hansen 1998). Other states, like Austria and Italy, simply have shorter residence requirements for naturalisation for EU citizens (Vink and De Groot 2010). When looking at the data on German dual citizens in 2015, as shown in Table 2, it is evident that dual citizens of Germany mostly come from Europe, with the majority of them coming from other EU member states.

However, while EU citizenship does give citizens certain perks, some are curious about how meaningful citizenship really is. All people with EU member state citizenship automatically have EU citizenship. However, this means that in order to obtain EU citizenship, there are technically 28 different ways to do it, because each member state has jurisdiction over how people obtain its own citizenship (Kochenov 2011).

Dual citizenship in the EU is likely to continue to develop and reflect changing attitudes towards the proper relationship between a state and its people. Buried in these policies are philosophies about how we define personal identities, the identities of a group, and how to allow for these groups to grow and change and accommodate each other as people migrate. Dual citizenship may become a common phenomenon in the next decades, or it may be on the wane. More data on

Table 2  
Dual Citizens in Germany in 2015

Citizenship	German Dual Citizens (in thousands)		
	Total	Men	Women
The First Foreign Citizenship	1 686	827	858
<b>Europe</b>	1 308	630	678
<b>EU-28</b>	737	345	393
Bulgaria	13	5	8
France	49	20	29
Greece	50	26	24
Italy	117	60	58
Croatia	22	9	13
Netherlands	27	14	13
Austria	35	15	20
Poland	220	102	118
Portugal	18	9	9
Romania	67	28	39
Spain	36	18	18
United Kingdom	24	11	13
<b>Non EU-Europe</b>	571	286	285
Bosnia and Herzegovina	8	n.a.	n.a.
Kosovo	15	9	6
Russian Federation	228	111	117
Serbia	18	8	10
Turkey	246	128	118
Ukraine	13	6	7
<b>Africa</b>	70	41	29
Morocco	29	17	12
Egypt, Algeria, Libya, Tunisia	25	15	11
<b>America</b>	126	63	63
<b>North America</b>	69	36	34
<b>United States</b>	64	33	31
<b>Central and South America</b>	57	27	30
<b>Asia, Australia, Oceania</b>	182	94	88
<b>Near and Middle East</b>	135	70	65
Iraq	8	5	n.a.
Iran	48	25	23
Kazakhstan	41	18	23
Syria	12	8	n.a.
<b>Other Asia</b>	41	20	20
Afghanistan	9	6	n.a.
<b>Previous Territory of Yugoslavia</b>	75	36	39
<b>USSR</b>	299	143	156
<b>Guest worker states</b>	580	300	280
<b>EU member states before 2004</b>	379	183	195
<b>EU member states since 2004</b>	359	1	197

Source: Destatis (2015).

the number of dual citizens and how they obtained their citizenships is crucial to gaining a deeper understanding of this issue. This would lay the foundations for more concrete judgements on dual citizenship's effects on integration and the lives of citizens of EU member states and the EU.

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