

**Dual Citizenship and Democracy:  
Normative Requirements, Individual Consequences, and Policy Change**

Von der Fakultät Staatswissenschaften  
der Leuphana Universität Lüneburg zur Erlangung des Grades

Doktor der Sozial- und Wirtschaftswissenschaften  
– Dr. rer. pol. –

genehmigte Dissertation von Martin Weinmann  
geboren am 18.08.1982 in Darmstadt

Eingereicht am: 11.11.2025

Mündliche Verteidigung am: 26.05.2026

Erstbetreuerin und -gutachterin: Prof. Dr. Sybille Münch, Universität Hildesheim

Zweitbetreuer und -gutachter: Prof. Dr. Maarten Vink, European University Institute

Drittgutachter: Prof. Dr. Rainer Bauböck, European University Institute

Die einzelnen Beiträge des kumulativen Dissertationsvorhabens sind oder werden ggf. wie folgt veröffentlicht:

Weinmann, Martin. (eingereicht). “Democracy and Dual Citizenship. A Normative Analysis of Policies in EU Countries.” *Citizenship Studies*.

Weinmann, Martin. 2022: “Barriers to Naturalization: How Dual Citizenship Restrictions Impede Full Membership.” *International Migration* 60 (5): 237–251.  
<https://doi.org/10.1111/imig.12950>

Weinmann, Martin. 2026: “Advocacy Coalitions, Power and Opportunities: Policy Change in Germany’s Dual Citizenship Policy Subsystem.” *German Politics*: 1–26.  
<https://doi.org/10.1080/09644008.2026.2673121>

Veröffentlichungsjahr: 2026

DOI: 10.48548/pubdata-3786



## Acknowledgments

First, I would like to thank my wife Karoline for her support in this project and in all other aspects of life. Without you, completing this work would hardly have been possible, especially during a time when both of us were stretched to our limits to the many simultaneous challenges of family, work, the lockdown, and the renovation of a cultural heritage as a home for our family. You provided me with the support I needed, but also always made it clear that I could end this project at any time if it became too overwhelming.

Thanks also to my children, Noah and Henri, for simply being yourselves and loving us unconditionally. On many evenings, I wished I could have just stayed in bed with you instead of returning to my desk.

I would also like to thank my parents, Birgit and Ernst, for their unconditional support. Thank you for showing me early on the privilege of making my own educational choices.

I am deeply grateful to Prof. Dr. Sybille Münch for the constructive supervision of this dissertation project and for always being available over the years for questions, helpful feedback, advice, and guidance, as well as for the many conversations beyond this project.

Thanks also to Prof. Dr. Maarten Vink and Prof. Dr. Rainer Bauböck, who agreed to co-supervise this dissertation and join the committee, and who provided constructive feedback beyond the associated duties.

A special thank you goes to my mentors and former colleagues, Dr. Holger Kolb, Dr. Jan Schneider, and Dr. Christian Babka from Gostomski, for encouraging me to take this path. Thanks also to Dr. Cornelia Schu, Prof. Dr. C. Katharina Spieß, and Dr. Andreas Ete for giving me the opportunity and support to start and finish this project. I thank Dr. Axel Kreienbrink and Christoph Walz for enabling me to use the data from the 2011 BAMF Naturalisation Study.

I would also like to thank everyone who generously provided exchange and feedback at various stages of this work over the past few years: Dr. Holger Kolb, Dr. Caroline Schultz, Alex Wittlif, Dr. Susanne Worbs, and Dr. Ruta Yemane, as well as my colleagues in the research area "Migration and Mobility" at the Federal Institute for Population Research (BiB). Thanks also to everyone who provided input during the colloquia and workshops at Leuphana University, the University of Hildesheim and the BiB. Finally, I would like to thank all my colleagues and friends who are not explicitly mentioned here but who always supported me with their attentive listening.

Martin Weinmann

# Table of Contents

Tables and Figures .....	i
Summary .....	ii
Zusammenfassung.....	iii
1. Introduction to the thesis.....	1
1.1 Objectives and overarching research question .....	3
1.2 Study design and methodological approach.....	6
Article 1 .....	7
Article 2 .....	9
Article 3 .....	12
Overview of the conceptual framework.....	13
1.3 Contribution of the papers to the research question .....	15
Article 1 .....	15
Article 2 .....	16
Article 3 .....	17
Contribution to the research question .....	18
1.4 Contribution to existing research .....	19
Theoretical contribution.....	19
Empirical contribution .....	20
Methodological contribution.....	23
2. Democracy and Dual Citizenship. A Normative Analysis of Policies in EU Countries. (Article 1) .....	25
2.1 Introduction .....	26
2.2 Acquisition of dual citizenship.....	28
2.3 Theoretical background: Dual citizenship for whom and why?.....	28
Democratic inclusion of migrants.....	28
Dual citizenship for first-generation migrants .....	30
Dual citizenship for second and subsequent generation migrants .....	31
2.4 Dual citizenship in the EU.....	32
Data sources .....	32
Coding strategy .....	33
Comparison of dual citizenship .....	34
2.5 Summary and discussion .....	43
2.6 References .....	47
3. Barriers to Naturalization: How Dual Citizenship Restrictions Impede Full Membership. (Article 2).....	52

3.1 Introduction .....	53
3.2 Dual citizenship in Germany .....	55
3.3 Empirical findings on naturalization and dual citizenship .....	56
3.4 Theoretical background .....	58
3.5 Data and analysis .....	60
Data .....	60
Measures .....	62
Analyses and findings .....	66
3.6 Conclusion and discussion .....	69
3.7 References .....	72
4. Advocacy Coalitions, Power and Opportunities: Policy Change in Germany's Dual Citizenship Policy Subsystem. (Article 3) .....	81
4.1 Introduction .....	82
4.2 Research framework .....	83
Dual citizenship reforms as a contested policy issue .....	84
Advocacy Coalition Framework .....	85
Empirical strategy .....	88
4.3 Dual citizenship policy in Germany between 1999 and 2024 .....	89
Citizenship policy before the 1999 reform .....	89
Stability and change: The citizenship reform in 1999 .....	90
Adjustments and change: Problem solving from 2007 to 2014 .....	94
Stability: Ongoing debates without change between 2014 and 2019 .....	98
Change: The Citizenship Modernization Act of 2024 .....	99
4.4 Summary and discussion .....	102
4.5 References .....	107
5. Summary and conclusion of the thesis .....	114
5.1 Main findings .....	114
5.2 Main contributions .....	115
5.3 Limitations and perspectives for future research .....	116
5.4 Implications and outlook .....	118
6. References for Chapter 1 & 5 .....	121
7. Appendix I: Presentations of the Dissertation Project and Articles .....	136
8. Appendix II: Appendices of the Articles .....	137
8.1 Appendix of Article 1 .....	137
8.2 Appendix of Article 2 .....	152
8.3 Appendix of Article 3 .....	169

## Tables and Figures

Table 1.1: Sub-questions of the dissertation addressed in the research articles.....	6
Table 1.2: Overview of research articles included in the cumulative dissertation and publication status.....	7
Table 1.3: Overview of the conceptual framework.....	14
Table 2.1: Dual citizenship in EU countries. ....	35
Figure 3.1: Main results of the cluster-robust logistic regression on decision to naturalize clustered by origin country (N = 1,046).....	68
Figure 3.2: Main results of the cluster-robust logistic regression on desire to retain the original citizenship clustered by origin country (non-naturalized immigrants only, N = 361). ....	69

## Summary

This dissertation investigates the role of dual citizenship in the context of political membership and democratic boundaries. The project draws on theoretical insights from democratic theory, while also integrating perspectives from political sociology, as well as migration and integration research. It applies a multi-method research design to examine various dimensions of dual citizenship policies. Empirical approaches include a comparative policy analysis guided by a normative framework, a quantitative analysis of survey data to investigate individual behavior, and an analysis of policy change based on a variety of documents. Data sources comprise citizenship policy databases, survey data, as well as parliamentary debates, legislative proposals, and other publicly available materials.

The cumulative dissertation consists of three articles. The first article establishes the normative framework for the entire project. It operationalizes a normative concept as a concrete evaluative framework and develops a set of criteria to assess the quality of dual citizenship regimes in democratic states. This framework also serves as the basis for a comparative analysis across countries. The second article shifts to the individual level, examining how dual citizenship policies influence naturalization behavior. It highlights how both, legal and symbolic barriers, affect the decision to apply for citizenship, and how the availability (or lack) of dual citizenship can shape political inclusion in practice. The third article focuses on the policy process, exploring the conditions under which dual citizenship reforms occur and identifies the key political, institutional, and discursive factors that enable change in this contested policy field. Together, the articles offer a multi-dimensional perspective on dual citizenship policy, linking macro-level legal frameworks, micro-level behavioral responses, and meso-level political processes.

Taken together, the three articles demonstrate how dual citizenship policies should not only reflect considerations of democratic theory but also actively shape the quality of democracy by influencing patterns of political inclusion. Moreover, the findings underscore how political advocacy and institutional dynamics can drive reform, making citizenship more inclusive over time. By connecting normative theory to concrete policy outcomes, this dissertation contributes to a deeper understanding of democracy in an era of increasing mobility and transnational forms of belonging.

## Zusammenfassung

Die vorliegende Dissertation untersucht die Rolle doppelter Staatsangehörigkeit im Kontext politischer Mitgliedschaft und demokratischer Grenzziehung. Das Projekt stützt sich auf theoretische Ansätze der Demokratietheorie und integriert zugleich Perspektiven der politischen Soziologie sowie der Migrations- und Integrationsforschung. Mittels eines multi-methodischen Forschungsdesigns werden unterschiedliche Dimensionen doppelter Staatsangehörigkeit analysiert. Die empirischen Zugänge umfassen eine vergleichende Policy-Analyse auf der Grundlage eines normativen Rahmens, eine quantitative Analyse von Umfragedaten zur Untersuchung individuellen Verhaltens sowie eine Analyse von Politikwandel anhand verschiedener Dokumente. Die Datengrundlage bilden unter anderem Datenbanken zur Staatsangehörigkeitspolitik, Umfragedaten, parlamentarische Debatten, Gesetzesentwürfe und weitere Quellen.

Die kumulative Dissertation besteht aus drei Artikeln. Der erste Artikel entwickelt das normative Fundament des Gesamtprojekts. Er operationalisiert ein demokratietheoretisches Konzept als Bewertungsrahmen und entwickelt Kriterien zur Beurteilung der Qualität von Regelungen zur doppelten Staatsangehörigkeit in demokratischen Staaten. Dieses Instrument bildet zugleich die Grundlage für eine vergleichende Analyse zwischen Staaten. Der zweite Artikel fokussiert auf die individuelle Ebene und untersucht, wie Regelungen zur doppelten Staatsangehörigkeit das Einbürgerungsverhalten beeinflussen. Er zeigt auf, inwiefern sowohl rechtliche als auch symbolische Hürden die Entscheidung zur Einbürgerung prägen und politische Inklusion mitgestalten. Der dritte Artikel richtet den Blick auf politische Prozesse und untersucht, unter welchen Bedingungen Reformen im Bereich der doppelten Staatsangehörigkeit stattfinden. Dabei werden zentrale politische, institutionelle und diskursive Faktoren identifiziert, die Veränderungen in diesem umkämpften Politikfeld begünstigen.

Zusammengenommen bieten die drei Artikel eine umfassende analytische Perspektive auf Staatsangehörigkeitspolitik, indem sie Regelungen auf der Makroebene, individuelles Verhalten auf der Mikroebene und politische Prozesse auf der Mesoebene miteinander verknüpfen. In ihrer Gesamtheit zeigen die drei Beiträge, dass Regelungen zur doppelten Staatsangehörigkeit nicht nur demokratietheoretische Überlegungen widerspiegeln sollten, sondern auch aktiv die Qualität von Demokratie beeinflussen. Darüber hinaus verdeutlichen die Ergebnisse, wie politische Interessenvertretung und institutionelle Dynamiken Reformprozesse anstoßen können – mit dem Potenzial, Staatsangehörigkeitspolitik inklusiver zu gestalten. Durch die Verbindung normativer Theorie mit konkreten Politikeffekten leistet die Dissertation einen Beitrag zu einem vertieften Verständnis von Demokratie im Zeitalter zunehmender Mobilität und transnationaler Zugehörigkeitsformen.

# 1. Introduction to the thesis

In some parts of political science research, a concerned perspective on the future of modern democracies has increased in recent years. Among other things, scholars argue that modern democracies are “under stress” (van Beek and Wnuk-Lipinski 2012; Tormey 2022; see also Giovannini and Wood 2022).<sup>1</sup> A ‘crisis’, ‘regression’, ‘erosion’, ‘decline’ or even a ‘death’ of democracies is observed (see, among others, Cerny 1999; Merkel 2015; Ambrose 2019; Galston 2020; Gerschewski 2021; Keck 2023; Kneuer 2021; Rüb, Selk, and Trimçev 2020; M. K. Miller 2021; Laebens and Lührmann 2023; Levitsky and Ziblatt 2018). The causes identified include political distrust (Bertsou 2019), populism and polarization (de la Torre and Ortiz Lemos 2016; Bennett and Kneuer 2024), disinformation and an increasing influence of digital media on political processes (Meyer 2002; Persily and Tucker 2020), the threat from terrorism (Wilkinson 2011; San-Akca 2014), the growing power of international financial markets (Dorn 2014), the globalization of nation-state democratic governance (Cammack 1998; Zürn 1998), social and economic inequality (Rau and Stokes 2025) or the transnational migration flows (Solimano 2010; Rother 2016). Challenges for democracy that international mobility brings with it include, for example, effects of mass migration on democratic development in migrant-sending countries (Auer and Schaub 2024), the challenges for immigration countries with irregular migration (Kuzelewska, Weatherburn, and Kloza 2018; Michael 2021), the securitization of migration, and anti-immigrant sentiment and populism (von Rosen 2019; Kapelner 2024) or challenges with regard to citizenship and conceptions of membership (Soysal 1994; Preuss 1998; Orgad 2019; Wihtol de Wenden 2025). The latter exist primarily because international migration leads to changes in the composition of the population, thereby creating challenges for the (re)definition of the citizenry (e.g., Pippenger 2024; d’Annibale and De Schutter 2025).

In this broader context, the dissertation examines the role of dual citizenship with regard to “political membership and democratic boundaries” (Bauböck 2017). Dual citizenship is framed as an indicator for democratic quality. Accordingly, the dissertation

---

<sup>1</sup> The idea for the doctoral project arose as part of an application for the “Democracy under Stress” scholarship program of the Center for the Study of Democracy at the Leuphana University of Lüneburg, see <https://www.leuphana.de/en/research-centers/zdemo-english/doctoral-programme-democracy-under-stress/research-programme.html> (22.10.2025).

centers on the significance of citizenship policy. This policy area “specifically entails the legal rules and practices that establish formal belonging in a national political community” (Goodman 2023, 137). The analysis investigates how dual citizenship policies shape democratic membership and influence the quality of democracy. In light of increasing global migration, these challenges are becoming ever more relevant – both academically and societally.

The dissertation project is cumulative in nature. It draws on theoretical approaches from democratic theory, but also incorporates perspectives from political sociology and (sociological) migration and integration research. A range of empirical methods is employed to address the individual sub-questions. These include a comparative policy analysis based on a normative framework, a quantitative analysis of survey data, and a document analysis guided by an analytical framework for examining policy change. The data sources consist of citizenship policy databases, survey data, and documents such as parliamentary debates, legislative proposals, and other publicly available materials.

The cumulative dissertation consists of three articles. The first article constitutes the normative framework of the entire project by presenting and operationalizing the underlying considerations of democratic theory. It not only provides the theoretical background for the overarching research question but also serves as the normative-analytical foundation for the comparative analysis of dual citizenship policies conducted in that article. The other articles address both the implications of these policies and the ways in which they evolve over time: the second article explores how dual citizenship policies affect individual behavior in practice, the third investigates the conditions and factors that drive policy change.

This dissertation examines dual citizenship as a dimension of democratic quality and contributes both empirically and conceptually to the following (political) science debates:

- Firstly, it complements normative debates by operationalizing a normative concept into a concrete evaluative framework for assessing dual citizenship policies in democratic states, bridging the gap between how policies should be designed and how they are actually implemented through measurable criteria.

- Secondly, the dissertation contributes to the citizenship studies literature by offering a multi-dimensional analysis of how dual citizenship policies affect political membership across various levels of analysis (macro, meso, and micro).
- Thirdly, it enriches migration and political sociology research by empirically demonstrating how both legal and symbolic boundaries affect individual naturalization behavior.
- Lastly, the dissertation provides a long-term analysis of change in dual citizenship policy and sheds light on the conditions under which gradual reform becomes possible in contested policy issues.

In the following sections, I first outline the objectives and overarching research question as well as the sub-questions of this cumulative dissertation (Section 1.1). This is followed by a presentation of the study design and methodological approach (Section 1.2). Subsequently, I summarize the contribution of the three articles to the overarching research question (Section 1.3). Section 1.4 presents the key findings of the three articles and discusses their contributions to the central research question and the existing research. This is followed by the three articles (Section 2, 3, 4). Finally, the overall results are summarized and discussed (Section 5).

### **1.1 Objectives and overarching research question**

This dissertation focuses on the challenges that international migration poses for democracy. It concentrates on the effects of immigration and emigration on the composition of the resident and voting population and thus on the impact on political processes. In view of increasing migration movements worldwide, these challenges are becoming increasingly important – both from an academic and a social perspective: In the “age of migration” (Castles and Miller 1993), belonging to a political community has increasingly lost its “fatefulness” (Masing 2001, 23, author’s translation). People’s center of life and place of residence are no longer ‘naturally’ and permanently predetermined, but are increasingly dependent on individual decisions, which in turn are influenced by globalization and international mobility and its governance. This development has led to significant challenges for the nation state and democracy, because the basic principle of representative democracy (universal suffrage) and the nation

state principle (only citizens are full members) have come into conflict (Hammar 1990). While place of residence continues to play a significant role in the political localization of individuals, this connection has become increasingly complex. The “emergence of external citizenship, where states extend rights to their non-resident nationals through mechanisms such as external voting rights and dual citizenship policies, reflects a shift in how membership is conceptualised beyond residence” (Falcke and Peters 2025, 2; see also Wellman, Allen, and Nyblade 2023; Umpierrez de Reguero and Vink 2025). In order to better understand the migration-related mismatch between the electorate and the resident population, as well as the influence of international migration on the legitimacy of political processes, it is important to consider both immigration and emigration, along with their respective impacts.

The broader theoretical framework of my dissertation is centered on the well discussed “boundary problem” in democratic theory. This problem arises from the need for a clearly defined group of members who have the right to participate in democratic decision-making within a self-governing political community, which depends on setting clear boundaries (for primary as well as recent contributions see, among others, Dahl 1970, 1989; Whelan 1983; Abizadeh 2012; Song 2012; Scherz 2013; Angeli 2015; Arrhenius 2018; D. Miller 2020). This normative challenge revolves around the question of who ought to be included within a self-governing political community and who may be excluded. The “boundary problem” has become more acute in the context of international migration and globalization: addressing it requires clarifying how to include non-citizen residents who are permanently present within a state’s territory and their children born there, as well as non-resident citizens and their children born outside the state’s territorial borders (see, among others, Carens 2016; Song 2016; Bauböck 2018). The key challenge lies in avoiding both the exclusion of individuals who do have effective ties to the political community and the inclusion of those lacking such ties (e.g., Shachar 2003; Song 2012). Accordingly, it is problematic in terms of democratic theory if citizens living in the country are (permanently) excluded from political decision-making. This is the case in countries of immigration when foreigners who have lived in the country for many years (or were born there) do not have the right to vote or do not acquire this right by acquiring citizenship (under-inclusion) (e.g., Shachar 2003; Bauböck 2005). A similar problem exists in reverse, however, if the political system in a country is (or can be) influenced by emigrants or their descendants

who are only affected to a limited extent or not at all by the political decisions made there (over-inclusion) (e.g., Lopez-Guerra 2005; Rubio-Marín 2006; Honohan 2011). This is particularly the case when membership and voting rights are passed on indefinitely to the descendants of emigrants across generations, even when these descendants have no genuine political link to the country of their ancestors and may never have lived there (Bauböck 2007). Thus, although both constellations raise related challenges in terms of democratic theory, they differ in their underlying dynamics: on the one hand (1), the issue arises because immigrants (and possibly their descendants) hold only the citizenship of their country of origin, but not that of the destination country (and therefore lack voting rights). On the other hand (2), the problem occurs when emigrants have more than one citizenship, namely that of the country of origin and that of the country of destination, and pass on both nationalities and associated political rights to their descendants. Against this background, the present dissertation aims to contribute to a better understanding of the role of dual citizenship policies in shaping democratic membership and the quality of democracy by answering the question:

*How do dual citizenship policies influence democratic membership and the quality of democracy?*

In order to address this overarching question, several sub-questions have been specified, each of which is examined in the individual articles and presented in the following Table 1.1.

**Table 1.1: Sub-questions of the dissertation addressed in the research articles**

<b>Sub-questions</b>	<b>Article</b>
1 How should democracies deal with dual citizenship from a normative point of view?	1
2 To what extent do dual citizenship policies meet democratic requirements?	1
3 How do dual citizenship policies impede democratic membership?	2
4 How is policy change taking place in the field of dual citizenship in Germany?	3

The following section presents the study design and methodological approaches employed to address these sub-questions and to structure the cumulative dissertation accordingly.

## **1.2 Study design and methodological approach**

The cumulative dissertation consists of three research articles, each addressing the previously formulated sub-questions. The articles draw on theoretical approaches from democratic theory, while also incorporating perspectives from political sociology, (sociological) migration and integration research as well as an analytical framework for the study of political processes. The individual contributions employ different data sources and methodological approaches. Moreover, they focus on different levels of analysis. For an overview and publication status of the three articles see Table 1.2.

The three interrelated articles together provide a comprehensive analysis of the role of dual citizenship policies in shaping democratic membership and the quality of democracy. The sequence of these papers follows a clear and coherent argumentative logic, moving from normative foundations to empirical realities and, finally, to processes of policy change. The research approach as well as interim stages and (partial) results of the individual articles have been presented and discussed in different contexts, as outlined in Appendix I: Table A0.1.

**Table 1.2: Overview of research articles included in the cumulative dissertation and publication status**

Article	Author	Title	Status
1	Martin Weinmann	Democracy and Dual Citizenship. A Normative Analysis of Policies in EU Countries.	During the dissertation review process, the manuscript progressed to ‘revise and resubmit’ in the journal <i>Citizenship Studies</i> (as of May 2026).
2	Martin Weinmann	Barriers to Naturaliza- tion: How Dual Citizen- ship Restrictions Impede Full Membership.	Published 2022 in the Journal <i>International Migration</i> , 60 (5), 237-251, <a href="https://doi.org/10.1111/imig.12950">https://doi.org/10.1111/imig.12950</a>
3	Martin Weinmann	Advocacy Coalitions, Power and Opportunities: Policy Change in Ger- many’s Dual Citizenship Policy Subsystem.	During the dissertation review process, the manuscript underwent a revision and was published 2026 in the Journal <i>German Politics</i> , 1-26, <a href="https://doi.org/10.1080/09644008.2026.2673121">https://doi.org/10.1080/09644008.2026.2673121</a>

*Article 1*

The first article addresses the question of how democracies should deal with dual citizenship from a normative perspective. It focuses on the following sub-questions:

*How should democracies deal with dual citizenship from a normative point of view? (Sub-question 1)*

*To what extent do dual citizenship policies meet democratic requirements? (Sub-question 2)*

The article integrates normative policy analysis – focused on how dual citizenship policies ought to be, grounded in normative concepts – with empirical analysis, which draws on policy databases to describe citizenship regimes. Thus, it bridges the gap between normative considerations of how policies should be designed and a fact- and data-driven description of existing policies (Cairney 2023; Linquti 2024). The article establishes the theoretical framework by defining what democratic systems ideally ought to achieve regarding dual citizenship policies. In doing so, it sets the criteria and benchmarks that serve as a reference point for evaluating actual policies. The empirical

analysis draws on dual citizenship policies in EU member states and provides a normative comparison of how different democratic systems approach the issue in practice. Operating at the macro level, the article focuses on states and their dual citizenship policies, thereby laying the groundwork for the entire dissertation.

The paper starts from the observation that globalization and international mobility have created significant challenges for nation-states, democratic systems, and the institution of citizenship. In particular, these processes generate discrepancies between territorial borders and membership boundaries, resulting in non-resident citizens abroad and non-citizen residents domestically – a mismatch that is directly shaped by a country’s citizenship policy. This discrepancy is captured by the well-established “boundary problem” in democratic theory (e.g., Dahl 1970; Whelan 1983; Song 2012; Arrhenius 2018; D. Miller 2020), which highlights the challenge of defining a clear and legitimate membership for participation in democratic decision-making within a self-governing political community. Against this background, I first situate the research question within the broader context of the “boundary problem” in democratic theory and then briefly present selected normative solutions to this problem. Then I conduct a comparative analysis of dual citizenship policies across EU member states, employing Rainer Bauböck’s “stakeholder principle” as a normative framework (Bauböck 2007, 2009, 2015, 2018). Among other things, the principle can be used to address the question of who may legitimately claim full membership in two political communities, by taking into account migration patterns and individuals’ ties to different democratic polities. As a first step, I operationalize the “stakeholder principle” as a normative-analytical framework for evaluating citizenship policies through the use of comparable policy indicators. To this end, policy indicators drawn from multiple data sources are defined to capture the major forms of dual citizenship acquisition. They differentiate according to migrants’ generational status, as well as internal and external regulations on dual citizenship. In doing so, the paper characterizes, categorizes, and compares dual citizenship policies based on how inclusive or exclusive they are in order to identify “variations and similarities in policy patterns” (Goodman 2023, 140). The data sets include various resources provided by the EUI Global Citizenship Observatory (GLOBALCIT), such as the “Citizenship Law Dataset”, the Country Reports and the “Global Nationality Laws Database” (Vink et al. 2023; GLOBALCIT

2025a, 2025b), as well as the “MACIMIDE Global Expatriate Dual Citizenship Database” (Vink, de Groot, and Luk 2015). In addition, earlier overviews compiled by other researchers were used for verification and double checks (Sejersen 2008; Dumbrava 2014b, 2014a; van der Baaren 2020; Solano and Huddleston 2020), alongside national websites and other online resources containing official information on dual citizenship regulations (for detailed information see Appendix II). The analysis considers dual citizenship policies in place as of 2022, along with reforms enacted through 2024. My focus is on EU countries because they are all democratic states, the EU represents a major destination for international migrants from third countries, and there is significant intra-EU mobility. Moreover, although citizenship of an EU member state automatically confers Union citizenship, the rules governing the acquisition and loss of (dual) citizenship vary considerably among the individual member states.

The article has been submitted to the journal *Citizenship Studies*.

## *Article 2*

Drawing direct conclusions from dual citizenship policies to individual naturalization behavior is not possible because aggregate policy data represent country-level patterns that may conceal important individual differences. Inferring individual behavior solely from such aggregated data would result in an ecological fallacy (Robinson 1950). Specifically, this means: Just because a state’s policy regarding dual citizenship is restrictive, we cannot conclude that it actually prevents immigrants from acquiring citizenship, on the condition that they must give up or automatically lose their previous citizenship in order to obtain the new one. To accurately assess the effect of policies on immigrants’ naturalization decisions, it is therefore necessary to analyze data at the individual level. This approach allows for consideration of personal factors – such as sociodemographic characteristics and migration biography, social identity, individual level of integration, or family influence – that are interrelated with policies in shaping naturalization behavior. Against this background, the second paper empirically examines how dual citizenship policies as identified in Article 1 affect individuals’ full membership in the political community by addressing the following sub-question:

*How do dual citizenship policies impede democratic membership? (Sub-Question 3)*

Focusing on immigrants who actively and consciously decided to acquire German citizenship and those who chose not to naturalize despite fulfilling key eligibility requirements, the article explores the “consequences of policies for individuals” (Goodman 2023, 142). Germany serves as a case study in this paper, specifically in the period prior to the 2024 citizenship reform, when restrictive rules on dual citizenship were still in place. This context allows for a focused analysis of how policies shape individual behavior and perceptions. Thus, the paper zooms in on the micro level, showing how macro-level policies affect individual behavior (i.e., decisions to naturalize).

Starting from the observation that dual citizenship restrictions are widely seen as one of the major barriers to immigrant naturalization (e.g., Hammar 1985; Faist 2004), and acknowledging the rather “ambiguous” (Peters, Vink, and Schmeets 2016, 361) empirical findings regarding the effects of dual citizenship tolerance, this paper investigates how both legal restrictions and immigrants’ subjective perceptions of acceptance and belonging influence their decisions to naturalize. Theoretically, this paper primarily draws on the theory of “ethnic boundary making” (Wimmer 2008, 2013), which is particularly useful as it considers aspects of membership and affiliation. This is important because it can be assumed that naturalization is shaped not only by legal barriers, but also by perceived barriers related to membership conceptions, societal acceptance, and feelings of belonging (symbolic boundaries) – especially in the context of citizenship change (Diehl and Blohm 2003, 2011; Witte 2014, 2018).

The main data source for this paper is original survey data collected by the Federal Office for Migration and Refugees (BAMF), specifically the “2011 BAMF Naturalisation Study”, a cross-sectional survey of the immigrant population in Germany (Weinmann, Becher, and Babka von Gostomski 2012). The dataset includes both immigrants who actively and consciously decided to acquire German citizenship and those who chose not to naturalize despite fulfilling key eligibility requirements. The survey’s detailed information on immigrants’ countries of origin enables the inclusion of origin-country-specific variables. Accordingly, the data are supplemented with information on dual citizenship policies, based on the relevant application notes from the German Federal Ministry of the Interior and the “MACIMIDE Global Expatriate Dual Citizenship Database” (Vink, de Groot, and Luk 2015). This allows for consideration not only of whether German authorities exceptionally permit immigrants from certain countries to retain their original citizenship upon acquiring German citizenship,

but also of whether the laws of their countries of origin require the loss or renunciation of citizenship after voluntarily obtaining German citizenship. This is necessary “since dual citizenship is by definition the results of two states granting an individual citizenship”, and therefore “the measurement of a dual citizenship option (in order to assess its impact on naturalization propensity) requires taking into account the legal situation in two states” (Vink et al. 2021, 755; for a similar approach, see also Peters and Vink 2024). Furthermore, data from the “Quality of Nationality Index 2011 (QNI)” (Kochenov and Lindeboom 2019) are integrated, enabling an assessment of the quality of immigrants’ original citizenship in relation to German citizenship (for detailed information see Appendix II). This also allows for controlling in the analysis for potential benefits derived from naturalization in Germany. Together, these data sources enable a quantitative examination of the interrelation between dual citizenship policies and naturalization outcomes. Employing cluster-robust logistic regression models clustered by country of origin, I focus on two outcome variables. First, I examine how dual citizenship options drive long-term immigrants’ naturalization decisions, taking into account subjectively perceived barriers concerning acceptance and belonging regarding citizenship change. Second, I analyze the interrelation between long-term immigrants’ decisions not to acquire their destination country’s citizenship under the condition of giving up their original citizenship and the aforementioned subjectively perceived barriers.

Germany, prior to the comprehensive reform of its citizenship law in 2024, presents a particularly suitable case for studying the relationship between naturalization and dual citizenship restrictions. Historically characterized by a restrictive approach to both naturalization and dual citizenship, the country began to gradually liberalize its citizenship policies only in the late 1990s. Despite these reforms, dual citizenship remained generally restricted and politically contested, while at the same time numerous exceptions to the general principle of avoiding multiple citizenship existed. This makes it possible to study the impact of different dual citizenship regulations within a single country.

The article has been published in the journal *International Migration* and is accessible via the electronic references (DOI) listed in Table 1.2.

### *Article 3*

The final paper turns to the dynamic dimension of the topic by investigating how and why policies on dual citizenship change over time. It thus considers dual citizenship policies identified in Article 1, whose effects on naturalization behavior are analyzed in Article 2, and demonstrates how these policies can change over time. The focus of this article is on the sub-question:

*How is policy change taking place in the field of dual citizenship in Germany? (Sub-question 4)*

The article analyzes the conditions and actors that drive policy change in this field. Studying the “determinants of citizenship policies” helps us understand what leads “to inclusionary and exclusionary citizenship policy outcomes” (Goodman 2023, 136). Germany serves again as a case, this time explaining why a country with traditionally restrictive dual citizenship rules undertook significant reforms over two and a half decades. This illustrates how barriers to full membership can be reduced, ultimately enhancing democratic inclusion. The case demonstrates how policies can evolve to better meet normative standards and respond to the lived realities of affected individuals. Thereby the paper provides a forward-looking perspective on challenges and opportunities for democratic governance. This paper operates at the meso level, focusing on the “aggregated behaviour of policy participants through advocacy coalitions” (Bordin and Pinheiro 2022, 150), namely the role of the two dominant advocacy coalitions in shaping dual citizenship policy in Germany.

Building on the observation that dual citizenship is increasingly accepted worldwide, and addressing the related questions of why some states reform their policies toward a more open stance on dual citizenship while others maintain a restrictive approach over extended periods (Faist, Gerdes, and Rieple 2004; Sejersen 2008), this article examines how policy change regarding dual citizenship has unfolded in Germany between 1999 and 2024. To analyze policy change in this field, I employ the Advocacy Coalition Framework (ACF) (e.g., Sabatier 1987, 1993, 1998), which is well-suited for studying both policy change and stability, particularly in the context of contentious policy issues (Weible and Jenkins-Smith 2016). A core aim of the ACF is to explain belief and policy change over long time spans, making it an appropriate tool for investigating the evolution of Germany’s dual citizenship policy. Germany serves as a compelling

case study, as dual citizenship has sparked intense debate and considerable political controversy there – more so than in most other countries (Green 2005, 923). The country offers valuable insights into both political continuity and change concerning dual citizenship. The ACF-based analysis draws on a variety of documents, primarily parliamentary debates and legislative proposals concerning dual citizenship between 1999 and 2024. Additionally, publicly accessible materials such as press interviews and statements by key advocacy coalition actors are included (for detailed information see Appendix II).

The article is under review in the journal *German Politics*.

#### *Overview of the conceptual framework*

The study design and methodological approach – from normative foundations through empirical analysis to policy change – provides a coherent and structured conceptual framework across the three articles. Through the sub-questions addressed in each paper, the dissertation engages with broader analytical concerns:

- What ought to be?
- What is?
- What effect does it have?
- How does it change?

By working across multiple levels of analysis – state policies, individual behavior, and political processes – and linking different domains of citizenship studies – determinants and consequences of policy – the dissertation offers a multi-dimensional perspective on dual citizenship in democratic contexts. This approach enhances both theoretical depth and empirical relevance by linking democratic theory with insights from political sociology, migration research, and policy studies.

To clarify the structure and methodological distinctions of the three articles, Table 1.3 summarizes their respective analytical focus, conceptual framework, data sources and methods, empirical context, and role within the overall dissertation.

**Table 1.3: Overview of the conceptual framework**

	<b>Article 1</b>	<b>Article 2</b>	<b>Article 3</b>
<b>Analytical Focus</b>	Normative evaluation of dual citizenship policies	Impact of dual citizenship policies on naturalization decisions	Drivers and dynamics of policy change in dual citizenship
<b>Key Research Question(s)</b>	How should democracies deal with dual citizenship from a normative point of view?  To what extent do dual citizenship policies meet democratic requirements?	How do dual citizenship policies impede democratic membership?	How is policy change taking place in the field of dual citizenship in Germany?
<b>Theoretical &amp; Analytical Framework</b>	All Citizenship Stakeholders Principle (Bauböck 2007)	Theory of Ethnic Boundary Making (Wimmer 2008)	Advocacy Coalition Framework (ACF) (Sabatier 1987)
<b>Level of Analysis</b>	Macro level (comparative policy analysis across EU countries)	Micro level (individual behavior of long-term immigrants in Germany)	Meso level (advocacy coalitions and political processes in Germany)
<b>Methodological Approach</b>	Comparative policy analysis based on a normative-analytical framework using policy indicators (GLOBALCIT, MACIMIDE, and others)	Quantitative analysis using survey data and country level information, e.g., policies (BAMF, MACIMIDE, and others)	ACF-based document analysis (parliamentary debates, legislative documents, public statements, and others)
<b>Empirical Context</b>	EU member states (2022/24)	Germany (2011)	Germany (1999–2024)
<b>Contribution to the Overall Study</b>	Normative foundations: establishes normative criteria and benchmarks for evaluating dual citizenship policies	Practical implications: assesses the impact of policies on naturalization and political membership	Policy change: explains how and why dual citizenship policies change

This section has outlined the study design and methodological approach that underpins the cumulative research. The following section discusses how each article contributes to answering the overarching research question.

### 1.3 Contribution of the papers to the research question

In the following, the contribution of the three articles of the cumulative dissertation to answering the overarching research question *how dual citizenship policies influence democratic membership and the quality of democracy* is discussed. I first summarize the results of the individual articles before I discuss their overall contribution to answering the research question.

The three articles each focus on the following aspects:

- Article 1 develops a normative framework that sets out the normative requirements that policies should fulfill for conceptions of dual membership and establishes corresponding evaluation criteria and benchmarks for empirical analysis. A comparative analysis of EU Member States is used to examine the practical implementation of these measures in different democracies.
- Article 2 focuses on the practical impact of dual citizenship policies on immigrants' naturalization behavior, demonstrating how these policies influence the existing incongruence between resident and voting population.
- Article 3 studies how dual citizenship policies change over time, focusing on the role of advocacy coalitions. Thereby it highlights how significant reforms of restrictive policies can reduce barriers to full membership.

#### *Article 1*

Article 1 contributes both theoretically and empirically to the overarching research question by establishing and operationalizing normative criteria for evaluating the democratic quality of dual citizenship policies. Through the systematization and operationalization of the relevant aspects of the “stakeholder principle” (Bauböck 2007, 2009, 2015, 2018) related to dual citizenship, the article answers how democracies should deal with dual citizenship from a normative point of view: first- and second-generation migrants should be able to hold both the citizenship of their residence country and that of their origin country, while subsequent generations should no longer automatically acquire dual citizenship (see Section 2, page 32). Building on this foundation the article contributes empirically to the research question by showing how dual citizenship policies meet democratic requirements. Through a comparative analysis of EU member states, it highlights, at the macro level, the significant variation in how

democracies navigate tensions between territorial borders and political membership with regard to different dual citizenship regulations for various migrant groups. As a result, it shows that EU countries' citizenship policies meet normative criteria for dual membership only to a very limited extent: Few states' citizenship policies withstand normative scrutiny regarding the allowance and restriction of dual citizenship for different migrant groups. In fact, only eight out of 27 EU countries largely fulfill the normative criteria identified on basis of the "stakeholder principle" by permitting dual citizenship for first- and second-generation migrants, while limiting its automatic transmission to subsequent generations born abroad (see Section 2, page 36). The analysis reveals that many countries are either too restrictive (under-inclusive) or too permissive (over-inclusive), leading to democratic deficits (see Section 2, page 39-42). The study highlights the importance of these findings in the context of increasing migration and free movement within the EU, emphasizing how dual citizenship policies significantly affect democratic inclusion and equal treatment (see Section 2, page 43-44).

### *Article 2*

Article 2 bridges theory and practice by empirically examining "how individuals interact with those policy contexts" (Goodman 2023, 136). By demonstrating how policy designs concretely shape individual perceptions and behavior it sheds light on the dynamics of democratic membership and discrepancies between the electorate and the resident population. The article's key finding is that the legal requirement to renounce one's original citizenship constitutes a significant barrier to naturalization (see Section 3, page 66). In doing so, it shows "how policies matter and to whom" (Goodman 2023, 145; see also Vink, Prokic-Breuer, and Dronkers 2013). However, drawing on the theory of "ethnic boundary making" (e.g., Wimmer 2008; Witte 2014) the paper also shows that beyond legal constraints, subjectively perceived barriers – particularly those related to emotional and symbolic aspects of membership and belonging – also play a crucial role in shaping naturalization decisions. Thereby the study illustrates that it is not only (restrictive) policies that influence naturalization behavior, but also symbolic aspects related to the necessity of renouncing the citizenship of the country of origin, in particular family resistance against citizenship change (see Section 3, page 66-69). This aspect is also relevant in relation to the desire to retain citizenship

of the country of origin: non-naturalized immigrants whose family members oppose naturalization – and thus citizenship change – are more likely to express a preference for retaining their original citizenship than those whose family members do not oppose naturalization under the condition of citizenship change (see Section 3, page 67-69).

### *Article 3*

By applying the Advocacy Coalition Framework (ACF) (e.g., Sabatier 1987, 1993, 1998) to policy change on dual citizenship in Germany, Article 3 illuminates the mechanisms through which a democratic state adapts its citizenship policy, reducing barriers to membership and enhancing alignment with normative democratic ideals. This dynamic, process-oriented analysis underscores that dual citizenship policies are not static but subject to ongoing negotiation and contestation. The analysis identifies two enduring advocacy coalitions: one led by the CDU/CSU, which consistently opposed dual citizenship, and the other led by the SPD and the Greens, which supported policy change (see Section 4, page 89-90). These coalitions were stable in both composition and belief systems over time (see Section 4, page 102). The paper shows that policy change unfolded in three key phases: the introduction of *ius soli* with temporary and limited dual citizenship in 1999, the abolition of this limitation in 2014, and the full recognition of dual citizenship in 2024 (see Section 4, page 89-101). Moreover, I find that two ACF-related mechanisms were particularly important: shifts in power as well as changing opportunity structures at the federal policy-making level. The SPD and Greens used electoral victories in 1999 and 2021 to advance reforms, while the CDU/CSU leveraged *Bundesrat* influence in 1999 to block them, but was unable to do so in 2023 (see Section 4, page 90-94 and 99-101). This was because basic constitutional norms of Germany's federal system that had made a blockade possible in 1999 had changed as a result of the 2006 federalism reform. The revised criteria for the *Bundesrat's* approval of federal laws meant that in 2023/24, the Union parties were unable to act as veto player as they had before, allowing the red-green parties to implement their reforms without obstruction (see Section 4, page 103). Additional ACF elements also contributed to the policy trajectory. These are public opinion, a brokered compromise, changing beliefs as well as empirical issues concerning the seriousness and causes of the policy problem (see Section 4, page 103-104).

Thus, the article demonstrates that even in countries with traditionally restrictive policies, a shift toward a more democratic approach is possible: After the 2024 citizenship reform, Germany's dual citizenship policy is among the most inclusive in the EU – as demonstrated by the results of the normative empirical analysis presented in Article 1 (see Section 2, page 36).

#### *Contribution to the research question*

The three articles jointly respond to the overarching research question *How do dual citizenship policies influence democratic membership and the quality of democracy?* By examining this question through multiple analytical lenses, the articles offer an account of the interplay between normative ideals, empirical realities and political processes.

Taken together, the findings of the three individual articles illustrate how macro-level policies shape behavior at the micro level, thereby influencing democratic membership and the overall quality of democracy within a country. Moreover, meso-level processes highlight how political dynamics and advocacy efforts can drive changes in macro-level policies, enabling them to better align with normative democratic standards.

With regard to the overarching research question the following key findings can be stated:

- Dual citizenship policies should meet the requirements of democratic theory in order to define legitimate and inclusive membership boundaries for participation in democratic decision-making within self-governing political communities. (Article 1)
- Many existing dual citizenship policies are either too restrictive or too liberal, resulting in under- or over-inclusiveness – both of which generate democratic deficits and thereby negatively affect the quality of democracy. (Article 1)
- Dual citizenship restrictions constitute significant barriers to naturalization, preventing migrants from acquiring the citizenship of their country of residence and becoming full political members, thereby undermining the desirable congruence between the resident and voting population. (Article 2)

- Dual citizenship policies are subject to continuous negotiation and contestation, shaped by political debates, institutional actors, and dynamics. However, even in countries with traditionally restrictive policies, a shift toward a more democratic approach is possible in the long run. (Article 3)

Together, the three articles provide an integrated, multi-dimensional analysis that captures the complex ways in which dual citizenship policies shape democratic membership and the overall quality of democracy. At the macro level, such policies define formal boundaries of membership; at the micro level, they influence individual decisions and perceptions that determine political inclusion; and at the meso level, political actors and processes mediate between these layers, enabling policy adaptation and reform.

This comprehensive approach enhances theoretical understanding by bridging democratic theory with empirical research and policy analysis, while also providing practical insights into how democracies can respond to the challenges of globalization and international mobility in order to foster more inclusive forms of democratic membership.

#### **1.4 Contribution to existing research**

This dissertation offers an integrated perspective on the question *how dual citizenship policies influence democratic membership and the quality of democracy*. It contributes to the existing literature across theoretical, empirical, and methodological dimensions. By conceptualizing dual citizenship as a dimension of democratic quality, the study engages with debates in democratic theory, citizenship studies, political sociology, and migration research.

##### *Theoretical contribution*

The dissertation contributes to the growing body of work at the intersection of democratic theory and citizenship studies – “a robust and integrated field within political science” (Goodman 2023, 136). At the core of the dissertation lies an engagement with the “boundary problem” in democratic theory (see, among others, Dahl 1970; Whelan

1983; Song 2012; Arrhenius 2018; D. Miller 2020) – a longstanding, yet increasingly relevant issue in times of international migration. The boundary problem concerns a foundational question of democratic legitimacy: who should be included in the demos, and on what grounds? As democratic self-determination relies on clearly defined and normatively justified boundaries of membership, inconsistent inclusion criteria can undermine the legitimacy of democratic decision-making. The “boundary problem” has been addressed from various theoretical perspectives (e.g., Shapiro 2003; Lopez-Guerra 2005; Goodin 2007; Abizadeh 2008; Owen 2012; Angeli 2015; Bauböck 2018; D. Miller 2020). This study contributes to this debate by translating theoretical considerations of democratic inclusion into a framework for evaluating how dual citizenship policies align (or fail to align) with democratic criteria for legitimate membership. Drawing on Rainer Bauböck’s “stakeholder principle” (Bauböck 2007, 2009, 2015, 2018) the framework distinguishes between various dimensions of dual citizenship – including generational status and direction of migration (i.e., immigration vs. emigration). This framing helps capture the normative tensions between overly liberal regulations, such as granting dual citizenship to non-residents without social and political ties based solely on descent, and overly restrictive regulations, such as denying dual citizenship to long-term residents with such ties. In doing so, the dissertation advances theories of democratic inclusion and transnational membership, offering a structured normative approach to evaluate contemporary citizenship regimes. While previous normative scholarship has analyzed dual citizenship based on various democratic theories (Blatter 2011) no study has yet conducted a comparative assessment of how democratic states’ dual citizenship policies align with normative democratic principles. This dissertation fills that gap by systematically assessing whether dual citizenship regulations in democratic states (specifically, EU member states) meet the standards set by the “stakeholder principle”.

### *Empirical contribution*

Empirically, the dissertation addresses several aspects of dual citizenship policy and how they influence democratic membership and the quality of democracy:

- (1) Building on and combining existing data sources, such as the GLOBALCIT “Citizenship Law Dataset” and “Global Nationality Laws Database”, as well

as the “MACIMIDE Global Expatriate Dual Citizenship Database” (Vink et al. 2023; GLOBALCIT 2025b; Vink, de Groot, and Luk 2015), the dissertation evaluates dual citizenship policies across democratic states. While earlier studies have shown that most states now tolerate or permit dual citizenship (Sejersen 2008; Vink et al. 2019; van der Baaren 2020), they often overlook key variations in how states apply these policies across different modes of acquisition or migrant groups (Dumbrava 2014b; van der Baaren 2020). This dissertation confirms these findings by showing that most EU states widely permit dual citizenship, but often apply different standards to modes of citizenship acquisition and different migrant groups. At the same time the study goes beyond this research by analyzing the interaction between migration direction (immigration or emigration) and generational status (first- or second-generation migrants) in shaping dual citizenship access. In doing so, the study shows that states which differentiate between first- and second-generation migrants and/or immigrants and emigrants in their dual citizenship policies are particularly unlikely to meet normative requirements.

- (2) The dissertation further contributes empirical insights into the individual-level effects of dual citizenship policy. Previous studies have produced mixed findings regarding the impact of dual citizenship policies on immigrant naturalization. A significant strand of the literature focuses on naturalization rates among different immigrant groups, but results remain contradictory: Some studies find that naturalization rates in countries which allow dual citizenship are lower for immigrants from countries which also recognize dual citizenship compared to immigrants from countries not recognizing it (DeVoretz 2008; Dronkers and Vink 2012; Yang 1994). Other studies find that naturalization rates are higher among immigrants who are allowed to retain their original citizenship – either through the legal provisions in the country of origin or in the country of residence (Chiswick and Miller 2009; Mossaad et al. 2018; Vink, Prokic-Breuer, and Dronkers 2013). Some scholars confirm this positive effect only for certain immigrant groups (Helgertz and Bevelander 2017; Logan, Oh, and Darrah 2012). Studies that analyze policy changes – either in countries of origin or destination – present more consistent results: (i) the introduction of dual citizenship recognition in origin countries has positive effects on the naturalization

of immigrants living in countries that already allow dual citizenship (Jones-Correa 2001; Mazzolari 2005), (ii) the recognition of dual citizenship in immigration countries increases naturalization, while (iii) its abolition results in a decrease (e.g., Bevelander and Veenman 2006; Böcker and Thränhardt 2006; Labussière and Vink 2020; Vink et al. 2021). Findings from immigrant surveys support the view that the requirement to renounce origin-country citizenship constitutes a major barrier to naturalization (Chavez 1997; Venema and Grimm 2002; Huddleston 2020; Huddleston and Tjaden 2012), but also show that not all immigrants oppose renunciation – some accept it or proceed with naturalization despite objections (Diehl and Blohm 2001; Weinmann, Becher, and Babka von Gostomski 2012). Taken together, existing research indicates that the effect of dual citizenship policies on naturalization is not uniform. A key limitation in much of the literature is the assumption that all immigrants would naturalize if dual citizenship were allowed. This overlooks the fact that naturalization decisions are influenced by multiple factors, including personal, cultural, and socio-economic considerations. The dissertation goes beyond this research by taking into account not only legal barriers for dual citizenship, but also perceived barriers, such as societal acceptance, and feelings of belonging (symbolic boundaries) (Witte 2014, 2018). Using original survey data linked with information on both origin-country policies and residence-country exceptions it demonstrates how exclusive boundaries, such as the requirement to renounce prior citizenship, but also family resistance against citizenship change act as barriers to naturalization.

- (3) Moreover, the dissertation contributes to literature examining policy change with regard to dual citizenship. Although dual citizenship has become increasingly accepted worldwide – as shown above – there is still limited knowledge about what prompts states to reform their policies, or why some countries have maintained a negative stance towards dual citizenship (Faist, Gerdes, and Rieple 2004; Howard 2005; Sejersen 2008). By applying the Advocacy Coalition Framework (ACF) (e.g., Sabatier 1987, 1993, 1998; Weible and Jenkins-Smith 2016) to the contested field of dual citizenship, the dissertation shows how competing coalitions and belief systems have shaped German dual citizenship policy over the last 25 years. It documents the gradual shift in Germany

from a restrictive citizenship regime (with strict rules on dual citizenship) (e.g., Hollifield 1986; Brubaker 1992) to more inclusive policies that increasingly align with democratic principles.

- (4) At the same time, the dissertation provides the first comprehensive analysis to include the landmark 2024 reform, thereby moving beyond previous research that has largely focused on the reforms of the 1990s as well as the 1999 citizenship reform (Murray 1994; Green 2000, 2005, 2006; Joppke 1999, 2003; Faist and Triadafilopoulos 2006; Gerdes and Faist 2006; Howard 2008; Klusmeyer and Papademetriou 2009), and, to a lesser extent, the abolition of the option scheme (*Optionspflicht*) as part of the 2014 reform (Winter, Diehl, and Patzelt 2015).

#### *Methodological contribution*

The dissertation makes several methodological contributions by bridging normative theory and empirical analysis through an analytical framework that includes cross-national policy comparison, original survey data, and policy process tracing. This dissertation makes a distinctive methodological contribution to the study of dual citizenship and democracy by integrating normative political theory with empirical, multi-level, and mixed-method research. Unlike many existing studies that remain either in the domain of normative theory, or focus narrowly on one analytical level (macro, meso, or micro), this cumulative dissertation combines all three. It develops a multi-dimensional design that enables a more comprehensive understanding of dual citizenship as both a normative issue and an empirical phenomenon shaped by individual behavior and political contestation.

First, the dissertation offers a normative-empirical integration by translating a normative concept into measurable indicators to describe different existing policies (Cairney 2023; Linquiti 2024), allowing for the systematic comparison of these policies in light of social values (Weimer 2002). By operationalizing Rainer Bauböck's "stakeholder principle" using comparative indicators derived from multiple policy datasets it develops a normative benchmarking tool that enables the evaluation of dual citizenship pol-

icies across democratic states. This typology goes beyond other analyses of dual citizenship regimes, which do not distinguish between different migrant groups, generations and modes of dual citizenship acquisition.

Second, the dissertation contributes methodologically by bridging macro-level policy data with micro-level survey data. By combining detailed individual-level data – such as sociodemographic characteristics, indicators of integration, identity, attitudes, perceptions and behavior – with national-level policy data, the dissertation addresses the gap between dual citizenship policies, further policy related issues and immigrants' naturalization behavior. This integration enables an empirically grounded analysis of how both legal and symbolic boundaries of membership and belonging influence individual decisions to naturalize.

Third, the dissertation contributes to policy process research by applying the Advocacy Coalition Framework (ACF) to the domain of citizenship policy. While the ACF has been widely used to analyze policy change in other areas, such as energy, environmental and health policy, its application to migration-related fields remains limited (Weible, Sabatier, and McQueen 2009; Pierce, Peterson, and Hicks 2020). Although a few recent studies have applied the ACF to migration policy change (Ripoll Servent and Trauner 2014; Shin 2019; Wachuku 2019), it has not yet been used to analyze citizenship policy specifically – a surprising gap given that the ACF is particularly well suited to contested policy domains. The framework provides a systematic lens for examining how belief systems, advocacy coalitions, and political opportunity structures interact to shape policy change over extended periods of time. Citizenship policy is a highly contested domain, where advocacy coalitions promote competing belief systems on membership, national belonging, and integration. By extending the application of the ACF to this policy area, the dissertation demonstrates its methodological utility for analyzing long-term policy change in normatively charged and politically contentious fields.

In sum, the methodological contribution of this dissertation lies in its integrative, multi-level, and cross-disciplinary approach to studying dual citizenship. This methodological framework is both normatively grounded and empirically robust. It enables a comprehensive examination of how dual citizenship policies shape democratic membership and contribute to the broader quality of democracy.

## **2. Democracy and Dual Citizenship. A Normative Analysis of Policies in EU Countries. (Article 1)**

During the dissertation review process, the manuscript underwent peer review in the journal *Citizenship Studies* and received a revise-and-resubmit (R&R) decision. Status as of May 2026: ‘revise and resubmit’.<sup>i</sup>

### **Abstract**

Citizenship policies can have a significant impact on the congruence between the resident population and the citizenry. This paper comparatively analyses citizenship policies in EU countries based on a normative framework addressing the question which individuals have a claim to be full members in two polities. The analysis considers aspects of immigration and emigration as well as individuals’ relations to different democratic polities. Using a variety of resources, the analysis shows that the EU member states’ policies on citizenship meet normative criteria for dual membership only to a very limited extent. Thus, citizenship policies in most EU countries result in individuals who have weak ties to a political community being granted all the rights and benefits of membership in different polities (over-inclusiveness), while others are denied this right even though they have closer ties to two polities (under-inclusiveness).

## 2.1 Introduction

Globalization and international mobility have significant effects on nation-states, democratic systems, and citizenship (Hammar 1990). These lead to “discrepancies between territorial borders and membership boundaries by generating non-resident citizens abroad and non-citizen residents domestically” (Bauböck 2018a, 18). The scope of this mismatch is directly linked to a country’s citizenship policy. Restrictive policies for immigrants hinder alignment between the resident population and citizenry since the principle of avoiding multiple citizenship can be a barrier for citizenship acquisition for long term immigrants and their descendants (e.g., Hammar 1985; Peters, Vink, and Schmeets 2016). Conversely, too liberal provisions for emigrants exacerbate this mismatch since far-reaching acceptance of dual citizenship allows to include emigrants and their descendants into the citizenry. The challenge is to avoid excluding individuals with ties to the political community (under-inclusiveness) and including those without such ties (over-inclusiveness) (e.g., Song 2012). Solving this challenge is increasingly important due to rising global migration and growing acceptance of dual citizenship.

Past research on the consequences of international migration for citizenship has largely focused on immigration, with fewer comparative and normative studies on external citizenship rights (Bauböck 2006). There is empirical evidence that democracies not only receive immigrants from non-democracies, but also send emigrants to other countries in significant numbers (Breunig, Cao, and Luedtke 2012, 852), which may explain the growing interest in their emigration laws and external citizenship policies (e.g., Collyer 2013; Dumbrava 2014a; van der Baaren 2020). Studies on dual citizenship show an increase in dual citizenship acceptance, with some focusing on dual citizenship for either immigrants or emigrants, others examining policies for different migrant groups, and still others analyzing variations in policies based on acquisition methods and internal versus external arrangements (e.g., Sejersen 2008; Vink et al. 2019; van der Baaren 2020; Vink et al. 2023). The latter approach is useful for normative analysis since it highlights how different states apply varying standards for dual citizenship, with distinctions between first-generation migrants and their descendants, and between internal versus external dual citizenship (e.g., Dumbrava 2014b).

Although dual citizenship has been normatively analyzed through various democratic theories (Blatter 2011), no comparative study examines how well citizenship policies

in democracies align with normative standards for dual membership. This study aims to describe and compare citizenship policies in democratic states within a normative framework, focusing on how they address under- and over-inclusiveness in internal and external dual citizenship. It contributes to both the empirical literature on dual citizenship and the democratic inclusion of migrants. The research is guided by two questions: How should democracies deal with dual citizenship from a normative point of view? To what extent do democratic states' citizenship policies meet these requirements?

I use Rainer Brubeck's "stakeholder principle" (Bauböck 2007, 2009, 2015, 2018a) as a normative framework to determine which individuals are entitled to full membership in democratic polities based on their relationships with these polities. I analyze how citizenship policies in democratic states meet these normative requirements. I focus on EU countries since all EU countries are democracies, the EU is a major destination for migrants, and there is a high level of intra-EU mobility. Moreover, even though Union citizenship is automatically granted by membership in an EU state, the acquisition and loss of (dual) citizenship vary widely across member states (Orgad 2019).

In this article, I first operationalize a normative concept into a concrete evaluative framework and develop a set of criteria to assess the quality of dual citizenship regimes in democratic states. This framework then serves as the basis for a comparative analysis across countries. This approach allows for the evaluation of policies based on normative criteria by making abstract concepts measurable, facilitating a "systematic comparison of alternative policies in terms of social values" (Weimer 2002, 61). The paper bridges the gap between normative considerations of policy design and data-driven descriptions of actual policies (Cairney 2023; Linqiti 2024) by categorizing and comparing dual citizenship policies based on their inclusivity or exclusivity to identify "variations and similarities in policy patterns" (Goodman 2023, 140).

First, I describe the ways of dual citizenship acquisition. Then I discuss the theoretical considerations of my paper which serve as a normative framework for my later analysis. I then describe data and procedure used in my comparison, before summarizing the findings, which show that EU citizenship policies meet normative requirements for dual membership only to a limited extent.

## **2.2 Acquisition of dual citizenship**

Before analyzing dual citizenship, it is important to consider the different ways of dual citizenship acquisition. Dual citizenship arises when a person holds citizenship in more than one country, creating “individuals with a dual status who are full members in several states” (Sejersen 2008, 528). The different possibilities of dual citizenship acquisition vary by the generational status of migrants:

- (1) First-generation migrants acquire dual citizenship through naturalization if they do not have to renounce their original citizenship or lose it automatically upon obtaining the receiving state’s citizenship.
- (2) Second (and subsequent) generation migrants may receive dual citizenship automatically at birth or later. At birth, this occurs if (a) citizenship is passed from the parents via descent (*ius sanguinis*) and the birth country grants citizenship by birth in the territory (*ius soli*), or (b) if parents have different citizenship (binational parents).ii After birth, dual citizenship is acquired if the birth country allows facilitated citizenship acquisition for children of immigrants, provided their original citizenship is not lost (Bauböck 2003; Sejersen 2008).

States do not always apply the same standards for dual citizenship to immigrants, emigrants, and their descendants. Dual citizenship can also arise outside the territory for groups that are not of emigrant origin, such as kin minorities or investors. Conversely, restrictions may target non-national populations within the territory, like ethnic Russians in some former Soviet states. This underscores the need to distinguish between internal and external standards applied to individuals (e.g., Dumbrava 2014b).

## **2.3 Theoretical background: Dual citizenship for whom and why?**

### *Democratic inclusion of migrants*

The broader theoretical context of my paper is the boundary problem in democratic theory (for primary and recent contributions e.g., Dahl 1989; Whelan 1983; Abizadeh 2008; Angeli 2015; Miller 2020). This problem centers on who should be included in a self-governing political community and who should be excluded.

The “all affected interest principle” (AAI) and the “all subject to coercion principle” (ASC) are widely discussed in democratic theory, addressing under-inclusiveness. AAI argues that anyone whose interests are affected by a decision should be included in the decision-making process (e.g., Shapiro 2003; Goodin 2007). The principle considers that also individuals outside a polity’s territorial jurisdiction can be affected by its decisions, such as emigrants who may be interested in returning and who are at least affected by political decisions concerning their status as citizens living abroad. Critics of AAI argue that citizens abroad are not equally affected by decisions as residents, nor are they subject to the government’s territorial jurisdiction (e.g., Lopez-Guerra 2005). However, some interpretations of AAI suggest a global demos, claiming that state policies affect all humans either directly or indirectly, making their exclusion unjust (Goodin 2007).

ASC argues that all individuals subject to a government should have a claim to participate in the democratic processes (e.g., Dahl 1989; Owen 2012). This includes non-citizens permanently residing in a country, who are nearly as affected by policies as citizens. A radical interpretation sees the demos as “unbounded” (Abizadeh 2008, 38) arguing that immigration laws coercively subject the entire world, and thus people outside a state’s borders should have a say in immigration policy.

A further principle is Rainer Bauböck’s “all citizenship stakeholder principle” (Bauböck 2007, 2009, 2015, 2018a). This principle asserts that only individuals “who have a legitimate stake” in a polity’s self-governance can claim citizenship (Bauböck 2018a, 20). In Bauböck’s interpretation, the three principles differ in their territorial scope and complement each other by fulfilling different purposes of democratic inclusion. AAI and ASC focus on individuals’ relations to governments (decision-making and rights protection), while the stakeholder principle focuses on their relation to political communities (membership) (Bauböck 2015, for a critical discussion see 2018b). It differentiates between the demos (those with the franchise) and the citizenry (those with a stake in membership). The principle is based on the idea that “only those individuals have a claim to membership whose individual autonomy and wellbeing is linked to the collective self-government and flourishing of a particular polity” (Bauböck 2015, 825). It is based on an understanding of political communities as “transgenerational human societies” (Bauböck 2018a, 46). This includes those whose

fundamental rights depend on long-term protection by the polity (dependency criterion) or those subject to its authorities for a significant period of their lives (criterion of biographical subjection) (Bauböck 2009). Both criteria demonstrate a genuine link to a polity, justifying inclusion from a stakeholder perspective (Bauböck 2009).

The stakeholder principle addresses both under- and over-inclusiveness by considering discrepancies between territorial borders and membership boundaries, as well as individuals' ties to different polities. This makes it suitable for comparing (dual) citizenship policies, as it adopts a transnational perspective, viewing migrants as both emigrants and immigrants. It provides a framework to determine who has a claim to full membership in two polities. While dual citizenship differs from membership, both are connected. First, "dual citizenship breaks with the segmentary logic of the classic nation-state, according to which one could belong to only one state at a time" (Joppke 2003, 441). Second, it raises the possibility of "overlapping membership between territorially separated and independent polities" (Bauböck 2003, 700). The main argument of this paper is that citizenship policies impact democratic inclusion: restrictive policies increase under-inclusiveness, while liberal ones increase over-inclusiveness.

#### *Dual citizenship for first-generation migrants*

Bauböck's stakeholder principle addresses both immigration and emigration, highlighting individuals' relations to multiple polities. This makes it useful for analyzing dual citizenship policies, as it identifies who can claim full membership in two states. According to the principle, first-generation migrants have a right to dual citizenship based on their life circumstances. Given their strong interests in long-term membership in both their origin and residence countries, they should be able to retain their origin country's citizenship when naturalizing in their residence country. If dual citizenship is not allowed, they are forced to choose between two political communities, despite their interests in both (under-inclusiveness).

Long-term non-citizen residents are citizenship stakeholders due to their dependency and subjection. They should be entitled to naturalization if they meet residence requirements and be allowed to keep their original citizenship. Minor children immigrating after birth (1.5th generation) should have facilitated access to dual citizenship

(Bauböck 2018a). By naturalizing, immigrants voluntarily commit to joining a political community “based on birthright” (Bauböck 2018a, 67).

Long-term non-resident citizens who emigrated from their country of origin are stakeholders in their origin country due to their biographical ties (subjection). They should have a lifelong right to return, which includes retaining their original citizenship. Automatic loss of original citizenship upon acquiring another abroad also means losing the right to return (Bauböck 2009).

#### *Dual citizenship for second and subsequent generation migrants*

From a stakeholder perspective, second-generation migrants similarly have a stake in long-term membership in both their birth country and their parents’ origin country.

Regarding internal citizenship, children born to immigrants should automatically acquire the citizenship of their birth country, even if they also inherit their parents’ citizenship by descent (*ius sanguinis*). Raised in the country their parents migrated to, these children are clear stakeholders, must be recognized as full members from birth and should not be “treated as newcomers” (Bauböck 2018a, 68). They should not need to naturalize later or wait until adulthood to gain full citizenship (Bauböck 2018a). Without automatic citizenship provisions, these individuals face exclusion from full membership (under-inclusiveness).

Regarding the external aspects of citizenship, second-generation emigrants have a similar, though somewhat weaker, claim to their parents’ origin country citizenship. Until reaching adulthood, their circumstances are shaped by their parents’ decisions, including intentions to return. Therefore, they should have a right to return and acquire citizenship by descent at birth abroad (Bauböck 2009; see also Carens 2016). Children of emigrants should automatically receive their parents’ origin country citizenship, even if they also acquire birth country citizenship by *ius soli*.

However, the stakeholder principle allows for verifying the strength of second-generation migrants’ ties when they come of age – for example, by requiring an intention to reside in the origin country or by automatic loss of citizenship if they do not. Unlimited intergenerational transmission of citizenship by descent to further generations born abroad is not justified under this principle and risks over-inclusiveness (Bauböck

2018a). This concern is heightened as democracies increasingly extend voting rights to nationals abroad (Lafleur 2015; Wellman, Allen, and Nyblade 2023; Umpierrez de Reguero and Vink 2025; Wegschaider, Umpierrez de Reguero, and Bauböck 2025). For children of binational parents, external citizenship claims apply only if the relevant parent is a first-generation migrant.<sup>iii</sup> Consequently, the stakeholder principle makes an unlimited external transmission of (multiple) membership to subsequent generations impossible. They typically lack a sufficient stake in their grandparents' country to claim citizenship, unless their parents have renewed links by residing there (Bauböck 2018a, 69). Thus, no moral right to external citizenship exists for subsequent generations, although administrative discretion should allow exceptions, such as when third-generation emigrants demonstrate strong ties or to prevent statelessness (Bauböck 2009).

In summary, a normative ideal type for dealing with dual citizenship can be derived on the basis of the stakeholder principle: it should be allowed for first- and second-generation migrants but limited for later generations. These groups have legitimate claims to both origin and residence country citizenship due to their genuine link to both. This ideal type serves as a framework for the following comparative analysis.

## **2.4 Dual citizenship in the EU**

### *Data sources*

The comparison of EU citizenship policies draws on multiple sources, primarily from the EUI Global Citizenship Observatory (GLOBALCIT), including the Citizenship Law Dataset (Vink et al. 2023), the Country Profiles (GLOBALCIT 2025a) and the Global Nationality Laws Database (GLOBALCIT 2025b). It also uses data from the MACIMIDE Global Expatriate Dual Citizenship Database (Vink, de Groot, and Luk 2015). Further resources for verification and double checks are earlier overviews compiled by other researchers (Sejersen 2008; Dumbrava 2014b, 2014a; van der Baaren 2020; Solano and Huddleston 2020) and additional online resources (for detailed information see Appendix II: Table A1.2 and Annex A1.1). The analysis reflects policies as of January 1, 2022, including updates through June 2024.

### *Coding strategy*

The comparative analysis examines dual citizenship policies based on the main acquisition pathways, distinguishing by migrant generation and by internal vs. external provisions (Table 2.1).<sup>iv</sup> A country is coded as allowing dual citizenship for a given group if it permits it generally, not only for specific countries (e.g., EU or treaty countries or countries with special ties, for detailed information see Appendix II: Table A1.1, A1.2 and Annex A1.1).

For the internal dimension, the analysis examines whether countries allow dual citizenship for first-generation migrants upon naturalization. For the second generation, it focuses on whether children born in the country may retain another citizenship acquired at birth. This includes automatic birthright citizenship (*ius soli*) and facilitated naturalization for second-generation migrants or 1.5-generation immigrants (those with a certain period of residence as minors).<sup>v</sup> If no specific provisions exist for the second generation, general naturalization rules for the first generation apply – typically precondition-rich and more restrictive, often requiring majority age.

Regarding external dual citizenship, the analysis focuses on whether a country allows first-generation emigrants to retain their original citizenship after voluntarily acquiring another abroad. For the second generation, it considers whether children born abroad to first-generation emigrants automatically acquire their parents' origin country citizenship, even when they acquire another at birth. The analysis also examines whether states limit dual citizenship across generations – either by restricting acquisition at birth from a certain generation onward or by later withdrawing citizenship due to a lack of genuine link or territorial connection (e.g., absence of residence or failure to return by a certain age).<sup>vi</sup> While such rules may primarily aim to regulate citizenship transmission, they also restrict the indefinite inheritance of dual citizenship. Notably, these provisions do not apply if they would result in statelessness.<sup>vii</sup> Restrictions for children of binational parents, whether born in or outside the country, are also included in the analysis.<sup>viii</sup>

Since the stakeholder principle provides the framework for assessing the extent to which dual citizenship policies in EU countries meet normative requirements for addressing under- and over-inclusiveness, the results are presented according to how effectively these issues are mitigated.

### *Comparison of dual citizenship*

Citizenship policies best meet the stakeholder principle when they allow dual citizenship for first and second-generation migrants, but limit it for later generations born abroad (*inclusive dual citizenship*). Policies fully allowing dual citizenship after the second generation born abroad are *over-inclusive*, granting citizenship to those with minimal ties. Conversely, fully prohibiting dual citizenship results in *under-inclusiveness*, excluding individuals with strong connections to two countries. Policies are *partly under-inclusive* if dual citizenship is selectively allowed for some groups of first or second-generation migrants and delimited for subsequent generations born abroad. If the latter is not the case the policies are *partly under- and over-inclusive*. Table 2.1 summarizes the policies of all EU countries. Unless otherwise noted, sources are listed in Appendix II: Table A1.2 and Annex A1.1.

Table 2.1 shows that most EU countries permit dual citizenship in some form. 17 of the 27 member states allow dual citizenship for both first and second-generation immigrants and emigrants. Only one country fully prohibits dual citizenship. The rest allow it for some groups but restrict it for others. Fourteen states limit the transmission of dual citizenship across generations or as ties to the political community diminish.

**Table 2.1: Dual citizenship in EU countries.**

	Internal dual citizenship		External dual citizenship		limitation through loss or non-automatic acquisition <i>generation: criteria; prevention of loss / condition for acquisition</i>
	1 <sup>st</sup> generation	2 <sup>nd</sup> generation	1 <sup>st</sup> generation	2 <sup>nd</sup> generation	
<b>Inclusive dual citizenship</b>					
Belgium	✓	✓ <sup>ent</sup>	✓	✓	2 <sup>nd+</sup> : dual citizenship + generational ties + territorial ties; prevention of loss: timely declaration 3 <sup>rd+</sup> : generational ties; condition for acquisition: timely registration
Denmark	✓	[✓ <sub>18+</sub> ] <sup>disc(1.5th)</sup>	✓	✓	2 <sup>nd+</sup> : dual citizenship + generational ties + territorial ties; prevention of loss: genuine link + timely application (loss)
Finland	✓	[✓ <sub>18+</sub> ] <sup>ent</sup>	✓	✓	2 <sup>nd+</sup> : dual citizenship + generational ties + territorial ties; prevention of loss: genuine link + timely application (loss)
France	✓	✓ <sup>auto</sup>	✓	✓	2 <sup>nd+</sup> : generational ties + territorial ties + nationality certificate/ties to the state (effective loss)
Germany	✓	✓	✓	✓	3 <sup>rd+</sup> : dual citizenship + generational ties + territorial ties; condition for acquisition: timely registration
Ireland	✓	✓ <sup>terr, disc</sup>	✓	✓	3 <sup>rd+</sup> : generational ties; condition for acquisition: registration/application
Portugal	✓ <sup>ent</sup>	✓ <sup>terr/ent</sup>	✓	✓	2 <sup>nd</sup> : generational ties; condition for acquisition: registration/declaration 3 <sup>rd+</sup> : generational ties; condition for acquisition: registration/declaration + genuine link
Sweden	✓	✓ <sup>ent(1.5th)</sup>	✓	✓	2 <sup>nd+</sup> : dual citizenship + generational ties + territorial ties; prevention of loss: genuine link + timely application
<b>Over-inclusive dual citizenship</b>					
Czech Republic	✓	✓ <sup>disc</sup>	✓	✓	
Cyprus	✓	[✓ <sub>18+</sub> ] <sup>disc(1st)</sup>	✓	✓	
Greece	✓	✓ <sup>ent</sup>	✓	✓	
Hungary	✓	✓ <sup>disc</sup>	✓	✓	
Italy	✓	[✓ <sub>18+</sub> ] <sup>ent</sup>	✓	✓	
Luxembourg	✓	✓ <sup>ent</sup>	✓	✓	
Poland	✓ <sup>ent</sup>	[✓ <sub>18+</sub> ] <sup>ent(1st)</sup>	✓	✓ <sup>pater</sup>	
Romania	✓	[✓ <sub>18+</sub> ] <sup>disc</sup>	✓	✓	
Slovakia	✓	✓ <sup>disc</sup>	✓	✓	
<b>Under-inclusive dual citizenship</b>					
Latvia					2 <sup>nd+</sup> : dual citizenship + generational ties (effective non-acquisition)

- CONTINUED -

Table 2.1. Dual citizenship in EU countries.  
- CONTINUED -

Partly under-inclusive dual citizenship					
Malta	✓	[✓ <sub>18+</sub> ] <sup>disc(1st)</sup>	✓	[✓ <sub>∞/∅</sub> ]	3 <sup>rd+</sup> : generational ties (effective non-acquisition)
Netherlands		[✓ <sub>18+</sub> ] <sup>ent</sup>	✓	✓	1 <sup>st+</sup> : dual citizenship + territorial ties; prevention of loss: residence in EU > 1 year/nationality certificate
Slovenia		[✓ <sub>18+</sub> ] <sup>disc</sup>	✓	[✓] <sup>ocp</sup>	2 <sup>nd+</sup> : dual citizenship + generational ties; condition for acquisition: timely application
Croatia			✓	[✓] <sup>ocp</sup>	2 <sup>nd+</sup> : dual citizenship + generational ties; condition for acquisition timely registration/application
Spain	[✓] <sup>no proof</sup>			✓	2 <sup>nd+</sup> : dual citizenship + generational ties + territorial ties; condition for acquisition: timely application
Partly under-inclusive and over-inclusive dual citizenship					
Bulgaria			✓	✓	
Austria				✓ <sup>pater</sup>	
Estonia				✓	
Lithuania				✓	

Sources: GLOBALCIT Citizenship Law Dataset (v2.0), GLOBALCIT Country Profiles, GLOBALCIT Global Nationality Laws Database, MACIMIDE Global Expatriate Dual Citizenship Dataset (V5); author's own compilation; see Appendix II: Table A1.1, A1.2 and Annex A1.1 for details and information on additional resources. Status: January 1, 2022, changes included until June 2024. Legend: ✓ = dual citizenship is allowed; [✓<sub>18+</sub>] = dual citizenship is allowed only after coming of age; [✓<sub>∞/∅</sub>] = dual citizenship is allowed only if born in wedlock to a citizen or out of wedlock if mother is a citizen. Superscripts: <sup>ent</sup> entitlement (naturalization / application after birth), <sup>terr</sup> ius soli (acquisition at birth), <sup>auto</sup> automatic attribution (after birth), <sup>disc</sup> discretionary (application after birth), <sup>ocp</sup> one citizen parent: timely registration / application; <sup>no proof</sup> no proof of renunciation necessary, <sup>pater</sup> paternity / wedlock restriction: timely recognition; additional superscripts: <sup>(1st)</sup> 2<sup>nd</sup> generation must apply for regular naturalization under the same conditions as the 1<sup>st</sup> generation (no facilitated procedure), <sup>(1.5th)</sup> provisions for facilitated naturalization for foreign-born persons with a certain period of residence (1.5<sup>th</sup> generation) apply to the 2<sup>nd</sup> generation.

### Inclusive dual citizenship

Belgium, Denmark, Finland, France, Germany,<sup>ix</sup> Ireland, Portugal and Sweden largely align with the stakeholder principle through inclusive dual citizenship. They permit dual citizenship for both immigrants and emigrants in the first and second generation, while limiting its transmission to later generations born abroad. However, the specifics of these policies vary across countries (Table 2.1).

According to the stakeholder principle, first-generation migrants have a legitimate claim to dual citizenship based on their life circumstances. All eight countries allow

first-generation immigrants to retain their original citizenship upon naturalization. Likewise, emigrants from these countries do not lose their citizenship if they acquire another abroad.<sup>x</sup>

From a stakeholder perspective, second-generation migrants have a claim to long-term membership in both their birth country and their parents' origin country. All eight countries allow dual citizenship for this group but apply different approaches. Belgium, Portugal, and Ireland combine dual citizenship at birth with facilitated naturalization for second-generation immigrants born in the territory. Germany, Portugal, and Ireland allow dual citizenship at birth based on a conditional *ius soli*, while Belgium grants citizenship to children of non-citizens upon application before the age of twelve.<sup>xi</sup> These provisions are supplemented by possibilities of additional acquisition of the respective citizenship before coming of age on the basis of facilitated naturalization. France provides the possibility of dual citizenship for children born in the country to non-citizens and who have been resident in the country for five years since the age of eleven on the basis of an automatic attribution after birth.<sup>xii</sup> Sweden, Denmark, and Finland also permit dual citizenship for second-generation immigrants. In Finland, citizenship can only be obtained after coming of age. Even though there are no special provisions for the second generation in Sweden and Denmark, the provisions for facilitated naturalization for young immigrants with a certain period of residence or schooling in the country (1.5th generation) are applicable since they already enable young migrants to acquire the country's citizenship under facilitated conditions without giving up their original one. Nevertheless, only in Sweden young immigrants are entitled for facilitated naturalization before coming of age. In Denmark, this is only possible after coming of age under certain conditions on the basis of a discretionary decision.<sup>xiii</sup>

Regarding external aspects, second-generation emigrants from Belgium, Finland, France, Germany, Ireland, Portugal, and Sweden are allowed dual citizenship if they automatically acquire another citizenship at birth. This aligns with the stakeholder principle, as their life circumstances are shaped by their parents until adulthood. It is reasonable to verify their ties to their parents' origin country upon reaching majority. However, unlimited transmission of dual citizenship beyond the second generation contradicts the stakeholder principle and leads to over-inclusiveness. Accordingly, Belgium, Denmark, Finland, France, Germany, Ireland, Portugal, and Sweden restrict

citizenship transmission by descent for later generations. The countries differ in the conditions and effectiveness of these limits. In Denmark, Finland, France, and Sweden, children born abroad lose citizenship from the second generation if they cannot prove a link to the country. Nordic citizens born abroad with another citizenship and no residence history in their origin country or another Nordic country must request to retain citizenship before age 22, or lose it.<sup>xiv</sup> Proof of connection can include military service, frequent vacations, or educational stays. In Sweden, for example, second-generation emigrants' retention requests are usually approved, while later generations' requests are granted only if ties to Sweden remain (Bernitz 2012, 16). The French case differs: French citizenship can, in principle, be transmitted abroad indefinitely. However, it can be lost under strict conditions if no link to France is established – meaning the individuals have never resided habitually in France, never held French nationality, and their parents neither lived in France for 50 years nor held French nationality. Even though “(t)he loss of French nationality is mainly governed by the objective of limiting the number of cases of dual nationality” (Bertossi and Hajjat 2013, 16), the rule applies to all descendants living permanently abroad without ties to France, regardless of whether they hold another citizenship. In Portugal and Belgium, citizenship transmission differs by generation. Children born abroad to Portuguese parents do not automatically acquire citizenship but can acquire citizenship besides another citizenship through a procedure of “[v]oluntary acquisition of citizenship at birth” (Gil and Picara 2020, 16). Even if the acquisition of citizenship is based on descent, the person must declare the will to become Portuguese (in person or through a legal representative).<sup>xv</sup> For the third generation, applicants must also demonstrate effective ties to Portugal, such as language proficiency and regular contact with the territory. Belgium restricts dual citizenship from the second generation onward if ties to the territory are lacking: Foreign-born children with another citizenship lose Belgian citizenship automatically if they live abroad continuously from age 18 to 28 and do not declare their wish to keep it before reaching the age of 28. Subsequent generations acquire Belgian citizenship only if their birth is registered before the age of five. However, to prevent statelessness, Belgian citizenship is automatically granted if the person has not acquired another citizenship by the age of 18. Thus, the rules limit citizenship transmission mainly when another citizenship is acquired before adulthood. Children born abroad

to German citizens who were also born abroad no longer automatically acquire German citizenship.<sup>xvi</sup> However, they can obtain it retroactively from birth if their parents register the birth with German authorities before the child's first birthday. This process means that citizenship acquisition – and thus dual citizenship – “depends on the legal knowledge and administrative skills of the parents, which is hardly suitable as an indication for a genuine link” to the country (Masing 2001, 7; author's translation). In Ireland, the third emigrant generation does not automatically acquire citizenship but may apply for it through foreign birth registration. Even though this provision aims at delimiting automatic acquisition of citizenship abroad in general, it can also delimit dual citizenship in the succession of generations. However, citizenship may be passed on to foreign-born descendants “from generation to generation, provided that the chain is not broken by a failure to register” (Handoll 2010, 10) even though a second citizenship is automatically acquired. Thus, although Belgium and Ireland restrict automatic acquisition of (dual) citizenship, these limits “can be easily overcome by way of formal registration” (Dumbrava 2014a, 2345) without proving a genuine link.

#### Over-inclusive dual citizenship

Nine EU countries – Cyprus, the Czech Republic, Greece, Hungary, Italy, Luxembourg, Poland, Romania, and Slovakia – have over-inclusive dual citizenship policies. They allow dual citizenship for first and second-generation migrants but do not limit its transmission across generations abroad (Table 2.1). In all nine countries, immigrants can retain their original citizenship upon naturalization, and first-generation emigrants can keep their citizenship when voluntarily acquiring another.<sup>xvii</sup>

All nine countries allow second-generation immigrants to hold dual citizenship from birth, but with varying approaches. In Greece, second-generation immigrants can acquire dual citizenship through facilitated naturalization before adulthood.<sup>xviii</sup> In Luxembourg, second generation immigrants can acquire dual citizenship through facilitated naturalization if both they and their parents meet residence requirements – either before adulthood based on a declaration at the age of 12, or automatically after coming of age.<sup>xix</sup> In the Czech Republic and Hungary, second-generation immigrants may acquire dual citizenship before adulthood through a special naturalization procedure, but

only at the authorities' discretion if multiple conditions are met.<sup>xx</sup> In Slovakia, the second generation can additionally acquire Slovak citizenship under a facilitated naturalization procedure before coming of age.<sup>xxi</sup> In Italy and Romania, second-generation immigrants may acquire citizenship through facilitated naturalization, but only after reaching adulthood – and in Romania, only at the authorities' discretion. In Cyprus and Poland, second-generation immigrants cannot acquire dual citizenship at birth or through special procedures as minors; they must wait until they qualify for regular naturalization.

In all nine countries, citizenship can be transmitted indefinitely: children born abroad to a citizen automatically acquire their family's origin-country citizenship, regardless of generation, allowing for unrestricted dual citizenship.<sup>xxii</sup> This unlimited transmission by descent goes beyond the stakeholder principle and leads to over-inclusiveness. Poland, however, limits this slightly – children born to binational parents, whether in Poland or abroad, acquire Polish citizenship only if parenthood is established within one year of birth. This can be seen as a time-limited pathway to dual citizenship.

#### Under-inclusive dual citizenship

Latvia's citizenship law is under-inclusive, as it largely prohibits dual citizenship (Table 2.1). It is not permitted for first- and second-generation immigrants, nor for emigrants and their descendants.<sup>xxiii</sup> Citizenship by birth abroad is generally granted only if both parents are Latvian citizens. If only one parent is Latvian, citizenship is passed on only if the other parent is from a country with which dual citizenship is permitted.<sup>xxiv</sup> If a child acquires another citizenship before adulthood, it must choose between the two before the age of 25. As a result, dual citizenship is even not possible for children of binational parents.

It is important to note that, after regaining independence from the Soviet Union, Latvia reinstated pre-Soviet citizenship law to restore citizenship to former citizens and their descendants. The restrictive policy primarily aims to deny automatic citizenship to a specific group: immigrants from the Soviet period, particularly the ethnic Russian minority (Dumbrava 2014b).

### Partly under-inclusive dual citizenship

The citizenship policies of Croatia, the Netherlands, Malta, Slovenia and Spain are partly under-inclusive. They allow dual citizenship for some migrant groups but not others, and restrict dual citizenship for descendants of long-term emigrants through various provisions (Table 2.1).

Malta allows dual citizenship for first-generation immigrants, but their descendants cannot acquire Maltese citizenship automatically or through a special procedure. The second generation must wait for regular naturalization to gain dual citizenship upon reaching adulthood. With regard to the external aspects, the country allows dual citizenship for first-generation emigrants, but not generally for subsequent generations. Malta does so only as long as the child is born to a Maltese mother. Dual citizenship is not possible for children born to unmarried binational couples where the father is Maltese.<sup>xxv</sup> From the third generation onwards, Maltese citizenship cannot be acquired abroad at all.

The Netherlands and Slovenia allow dual citizenship only for second-generation immigrants as well as for emigrants and their direct descendants.<sup>xxvi</sup> However, in the Netherlands, second-generation immigrants can acquire Dutch citizenship through facilitated naturalization without renouncing previous citizenship, but only after reaching adulthood and if they have been residents since birth.<sup>xxvii</sup> In Slovenia, the second generation can acquire dual citizenship only through naturalization by discretionary decision, after meeting numerous requirements, reaching adulthood, and having resided in Slovenia since birth.<sup>xxviii</sup> Externally, children born abroad to binational parents do not automatically receive Slovenian citizenship at birth; it requires a parental application or the child's application between the age of 18 and 36. However, this restriction does not effectively delimit an intergenerational transmission of (dual) citizenship. Children born abroad who acquire another citizenship by birth also acquire Slovenian citizenship, and children of binational parents can apply for Slovenian citizenship. In the Dutch case, dual citizenship is not restricted by emigrants' generational status. However, dual citizens living abroad lose Dutch citizenship after turning 18 if they have lived outside the EU continuously for 13 years<sup>xxix</sup> and do not apply for a passport or other proof of nationality. This effectively limits dual citizenship for later generations by tying citizenship to territorial contact. It also aligns with a stakeholder

principle, as it preserves the first generation's lifelong right to return if they maintain their passport or nationality certificate.

Croatian citizenship law is asymmetrical regarding internal and external dual citizenship. Multiple citizenship is allowed for emigrants and their children but not for immigrants and their descendants. Automatic dual citizenship abroad is limited from the second generation onward, as a child's birth must be registered before age 21 if only one parent is a citizen and the other holds another citizenship. While this temporary registration requirement complicates dual citizenship acquisition for later generations, it does not effectively restrict it in principle.

On paper, Spain allows dual citizenship only for second-generation emigrants.<sup>xxx</sup> Children born abroad to a Spanish citizen automatically acquire citizenship, even if they have another citizenship at birth. Dual citizenship is restricted from the third generation onwards: those living permanently abroad lose Spanish citizenship when they reach the age of 21 unless they declare to retain it. For naturalization, an oath to renounce citizenship of countries with which dual citizenship is not explicitly tolerated is required, but actual renunciation is not enforced. Thus, renunciation is a nominal, not a de facto, condition for naturalization.

#### Partly under-inclusive and over-inclusive dual citizenship

Bulgaria, Austria, Estonia, and Lithuania have partly under-inclusive and over-inclusive dual citizenship. All four countries allow dual citizenship for foreign-born children of citizens regardless of generation (over-inclusive).<sup>xxx</sup> However, immigrants and their descendants cannot additionally acquire citizenship of these countries (under-inclusive).<sup>xxxii</sup> Only Bulgaria generally allows first generation emigrants to additionally acquire another country's citizenship. In Austria, time limits apply for children born to binational parents: for children born out of wedlock to a foreign mother and an Austrian father, paternity must be acknowledged within eight weeks after birth.

## 2.5 Summary and discussion

Regarding the implications of internal and external aspects of dual citizenship in democratic polities for conceptions of membership, this paper shows that EU countries' citizenship policies meet normative criteria for dual membership only to a very limited extent. Only the citizenship policies of few states stand up to normative scrutiny when it comes to allowing and prohibiting dual citizenship. Based on Bauböck's stakeholder principle which serves as a normative framework for the comparative analysis of citizenship policies, migrants' membership claims in different polities depend on their generational status: first- and second-generation migrants should be able to hold both the citizenship of their residence country and that of their origin country, while subsequent generations should no longer automatically acquire dual citizenship. However, only eight out of 27 EU countries largely meet these normative requirements by allowing dual citizenship for first and second-generation immigrants and emigrants while delimiting the intergenerational transmission of dual citizenship to subsequent generations born abroad.

Due to increasing migration movements to and within the EU as well as worldwide and an increasing acceptance of dual citizenship these findings are of importance from a normative as well as a societal perspective: citizenship policies can have a significant impact on the congruence between the resident population and the citizenry in countries with an internationally mobile population. Overly restrictive policies deny migrants all the rights and benefits of full membership in a polity if they have another country's citizenship even though they have close ties to both polities (under-inclusiveness). Overly liberal policies result in individuals who have weak ties to a political community being granted these rights and benefits automatically and additionally even though they have another country's citizenship (over-inclusiveness). In some cases, both issues coexist – excluding individuals with ties to the political community while including others with only weak ties.

The comparative analysis of citizenship policies confirms findings of other studies, showing that the majority of states worldwide and in the EU now widely permit dual citizenship and that states do not either allow or prohibit dual citizenship, but often apply different standards to modes of citizenship acquisition and different migrant groups (e.g., Sejersen 2008; Dumbrava 2014b; Vink, de Groot, and Luk 2015; van der Baaren 2020). Going beyond these findings, this study shows that especially those

states do not meet normative requirements that distinguish between first- and second-generation migrants and/or immigrants and emigrants with regard to the possibility of dual citizenship. This is problematic not only for reasons of equal treatment and anti-discrimination (Spiro 2011), but also because different standards for individual migrant groups can promote democratic under- and over-inclusiveness. However, the study leaves unanswered the reasons why some states make differences regarding dual citizenship between different migrant groups and others do not. Reasons can, for example, be “different historic starting points and conditions” (Winter 2014, 48), “preferential membership policies” (Dumbrava 2014b), to create closer ties with emigrants or to politically integrate immigrants by making naturalization easier (Sejersen 2008). Future research should explore whether normative principles guide states that apply uniform rules and uphold democratic values, through comparative case studies and analyses of policy debates.

However, in terms of policy implications, this paper highlights democratic deficits in EU countries that apply different criteria to migrant groups, leading to under- or over-inclusiveness. This issue matters for the EU as an area of free movement and common citizenship (Orgad 2019), as immigrants from third countries can easily become dual citizens and EU citizens in one EU country, while this is impossible in another EU state. Conversely, emigrating citizens from one EU state lose their national and Union citizenship if they acquire the citizenship of a third country, while citizens from another EU state can retain both their national and Union citizenship and even be able to pass both on to their descendants abroad without any restriction.<sup>xxxiii</sup>

---

#### Endnotes of Article 1

<sup>i</sup> I thank Sybille Münch and Rainer Bauböck for their useful comments on this paper.

<sup>ii</sup> A child born to *binational parents* in a third country and who acquires both parents’ citizenship by descent may also acquire a third citizenship if the birth country’s citizenship is acquired through *ius soli* or if at least one parent is a naturalized citizen who then passes on the origin country’s citizenship by descent.

<sup>iii</sup> Depending on the parents’ citizenship constellation and the dominant acquisition principles in their country of residence, second-generation migrants may even have a claim to a third citizenship. If first-generation migrants already hold dual citizenship, their children could potentially acquire citizenship in more than three states.

<sup>iv</sup> The comparative analysis focuses on dual citizenship provisions for migrants, excluding cases such as extraterritorial naturalization of kin minorities or citizenship restrictions targeting non-immigrant populations within a country.

- 
- <sup>v</sup> Provisions for double *ius soli* are considered but not central to the analysis, as they primarily apply to third-generation immigrants – i.e., children born in a country to a parent who was also born there.
- <sup>vi</sup> This may already apply to first-generation emigrants after a certain period of residence abroad.
- <sup>vii</sup> When assessing dual citizenship limitations for children born abroad, a country is coded as providing a limitation if such a provision exists in principle – regardless of how strict or effectively enforced it is. This includes requirements like applying for citizenship due to the absence of automatic acquisition by descent, for example through short time limits for birth registration or the need for an application or declaration to claim citizenship. Standard birth registration procedures, however, are not considered limitations.
- <sup>viii</sup> Purely formal recognition or legal establishment of maternity or paternity as prerequisites for acquiring citizenship by descent are not considered restrictions, provided they are not subject to strict time limits. Recognition or establishment occurring up to beyond the age of majority does not apply as such narrow time limit.
- <sup>ix</sup> On January 19, 2024, the German *Bundestag* passed a reform of the German Citizenship Act entering into force on June 27, 2024. The so-called "Act on the Modernization of Citizenship Law" facilitates access to German citizenship and enables dual citizenship.
- <sup>x</sup> In Denmark, Finland, France, and Sweden, young foreign-born individuals with sufficient residence or schooling (1.5<sup>th</sup> generation) can acquire citizenship under certain conditions. Only France and Sweden allow this before adulthood.
- <sup>xi</sup> In Portugal and Belgium these provisions are supplemented by a double *ius soli* (3<sup>rd</sup> generation).
- <sup>xii</sup> This provision is supplemented by a double *ius soli*.
- <sup>xiii</sup> A similar provision exists in Finland, where facilitated naturalisation is available for five years after coming of age, provided residence requirements are met.
- <sup>xiv</sup> See also the Judgment of the Court of Justice of the European Union in Case C-689/21.
- <sup>xv</sup> A registration of birth is regarded as a tacit declaration.
- <sup>xvi</sup> Provided the German parent was born abroad after 31 December 1999 and normally resides abroad at the child's birth.
- <sup>xvii</sup> Since April 1, 2022, Slovak citizens living abroad for at least five years can naturalize in their country of residence without losing Slovak citizenship.
- <sup>xviii</sup> This is supplemented by a possibility for young foreign-born individuals (1.5<sup>th</sup> generation) with sufficient residence or schooling to acquire citizenship before adulthood, along with a double *ius soli* rule.
- <sup>xix</sup> This is supplemented by a facilitated naturalisation procedure for those with a certain period of residence before adulthood. Provided they have attended school in Luxembourg.
- <sup>xx</sup> In the Czech Republic, young foreign-born individuals (1.5<sup>th</sup> generation) can acquire Czech citizenship through facilitated naturalization, but only after adulthood. In contrast, Hungary offers a special, though highly conditional, naturalization procedure that enables young foreign-born immigrants to acquire dual citizenship before adulthood.
- <sup>xxi</sup> This also applies to a separate procedure under which persons who have lived in Slovakia as minors for at least three years (1.5<sup>th</sup> generation) can additionally obtain the country's citizenship after coming of age.
- <sup>xxii</sup> In Cyprus birth registration is theoretically required for children born and permanently residing abroad. However, "(n)either the Law nor any regulations issued under the law provide [...] for the manner the registration should take place" (Trimikliniotis 2015, 12).
- <sup>xxiii</sup> Exceptions exist for citizens of EU, EFTA or NATO member states, as well as Australia, Brazil or New Zealand, and countries with which Latvia has signed a dual citizenship agreement – though no such agreement has been concluded.
- <sup>xxiv</sup> Another option is acquiring (dual) citizenship based on important state interests.
- <sup>xxv</sup> Although the European Court of Human Rights (ECtHR) ruled in 2011 (*Genovese v. Malta*) that this differential treatment was discriminatory, Maltese law still retains this provision (Aditus Foundation; European Network on Statelessness; Institute on Statelessness and Inclusion 2023).

- 
- <sup>xxvi</sup> Dutch citizenship is not lost when another citizenship is voluntarily acquired in certain cases, such as if the person obtained citizenship by birth in the Netherlands (1<sup>st</sup> generation).
- <sup>xxvii</sup> This provision is supplemented by allowing young foreign-born individuals with a certain period of residence (1.5<sup>th</sup> generation) to additionally acquire the country's citizenship under certain conditions (after reaching adulthood), as well as a double *ius soli*.
- <sup>xxviii</sup> This is supplemented by a special naturalisation procedure for individuals with a certain period of residence after reaching adulthood, provided several conditions are met.
- <sup>xxix</sup> Before April 1, 2022: ten years.
- <sup>xxx</sup> Exceptions exist for citizens of Latin American and some other countries. Facilitated naturalization is possible, either before or after coming of age, for individuals born in Spain who have lived there for one year, but dual citizenship is only allowed in exceptional cases. However, Spain applies a double *ius soli*.
- <sup>xxxi</sup> Estonian provisions regarding children born abroad to emigrants are fuzzy. The Citizenship Act requires individuals who acquire dual citizenship at birth to choose one citizenship between the ages of 18 and 21. However, "citizens by birth are constitutionally protected from involuntary loss of citizenship, which means that the loss provision is only applicable to a minority of Estonian citizens" (van der Baaren 2020, 5). In Lithuania, since 2015, individuals who acquired both Lithuanian and another citizenship at birth no longer have to choose between both citizenship at the age of 21. Since 2021, all persons who acquired Lithuanian citizenship by birth and another citizenship as minors – either at birth or later – may retain both after reaching adulthood.
- <sup>xxxii</sup> As in Latvia, Estonia's restrictive law is primarily aimed at preventing automatic access to citizenship for individuals who immigrated during the Soviet era.
- <sup>xxxiii</sup> See e.g., the Judgment of the Court of Justice of the European Union in Case C-689/21.

## 2.6 References

- Abizadeh, Arash. 2008. "Democratic Theory and Border Coercion. No Right to Unilaterally Control Your Own Borders." *Political Theory* 36 (1): 37–65.
- Aditus Foundation; European Network on Statelessness; Institute on Statelessness and Inclusion. 2023. "Universal Periodic Review. Malta." [https://files.institutesi.org/UPR45\\_Malta.pdf](https://files.institutesi.org/UPR45_Malta.pdf).
- Angeli, Oliviero. 2015. *Cosmopolitanism, Self-Determination and Territory. Justice with Borders*. Basingstoke: Palgrave Macmillan UK.
- Baaren, Luuk van der. 2020. "Dual Citizenship in the European Union: Trends and Analysis (2010-2020)." Florence.
- Bauböck, Rainer. 2003. "Towards a Political Theory of Migrant Transnationalism." *International Migration Review* 37 (3): 700–723.
- . 2006. "Citizenship and Migration - Concepts and Controversies." In *Migration and Citizenship. Legal Status, Rights and Political Participation*, edited by Rainer Bauböck, 15–31. Amsterdam: Amsterdam University Press.
- . 2007. "Stakeholder Citizenship and Transnational Political Participation: A Normative Evaluation of External Voting." *Fordham Law Review* 75 (5): 2393–2447.
- . 2009. "The Rights and Duties of External Citizenship." *Citizenship Studies* 13 (5): 475–99. <https://doi.org/10.1080/13621020903174647>.
- . 2015. "Morphing the Demos into the Right Shape. Normative Principles for Enfranchising Resident Aliens and Expatriate Citizens." *Democratization* 22 (5): 820–39. <https://doi.org/10.1080/13510347.2014.988146>.
- . 2018a. "Democratic Inclusion: A Pluralist Theory of Citizenship." In *Democratic Inclusion. Rainer Bauböck in Dialogue*, edited by Rainer Bauböck, 3–102. Manchester: Manchester University Press.
- . , ed. 2018b. *Democratic Inclusion. Rainer Bauböck in Dialogue*. Manchester: Manchester University Press.

- Bernitz, Hedvig. 2012. *EUDO Citizenship Observatory. Country Report: Sweden*. Florence: EUI.
- Bertossi, Christophe, and Abdellali Hajjat. 2013. *EUDO Citizenship Observatory. Country Report: France*. Florence: EUI.
- Blatter, Joachim. 2011. "Dual Citizenship and Theories of Democracy." *Citizenship Studies* 15 (6–7): 769–98. <https://doi.org/10.1080/13621025.2011.600090>.
- Breunig, Christian, Xun Cao, and Adam Luedtke. 2012. "Global Migration and Political Regime Type : A Democratic Disadvantage." *British Journal of Political Science* 42 (4): 825–54. <https://doi.org/10.1017/S0007123412000051>.
- Cairney, Paul. 2023. "The Politics of Policy Analysis: Theoretical Insights on Real World Problems." *Journal of European Public Policy* 30 (9): 1820–38. <https://doi.org/10.1080/13501763.2023.2221282>.
- Carens, J.H. 2016. "In Defense of Birthright Citizenship." In *Migration in Political Theory. The Ethics of Movement and Membership*, edited by Sarah Fine and Lea Ypi, 205–24. Oxford, UK: Oxford University Press.
- Collyer, Michael, ed. 2013. *Emigration Nations. Policies and Ideologies of Emigrant Engagement*. London: Palgrave Macmillan. <https://doi.org/10.1057/9781137277110>.
- Dahl, Robert A. 1989. *Democracy and Its Critics*. New Haven/London: Yale University Press.
- Dumbrava, Costica. 2014a. "External Citizenship in EU Countries." *Ethnic and Racial Studies* 37 (13): 2340–60. <https://doi.org/10.1080/01419870.2013.826812>.
- . 2014b. *Nationality, Citizenship and Ethno-Cultural Belonging. Preferential Membership Policies in Europe*. Palgrave M. Basingstoke.
- Gil, Ana Rita, and Nuno Picara. 2020. *GLOBALCIT. Report on Citizenship Law: Portugal*. Florence: EUI.
- GLOBALCIT. 2025a. "Country Profiles." Florence. <https://globalcit.eu/country-profiles/>.

- . 2025b. “Global Nationality Laws Database.” Florence.  
<https://globalcit.eu/national-citizenship-laws/>.
- Goodin, Robert E. 2007. “Enfranchising All Affected Interests, and Its Alternatives.” *Philosophy & Public Affairs* 35 (1): 40–68. <https://doi.org/10.1111/j.1088-4963.2007.00098.x>.
- Goodman, Sara Wallace. 2023. “Citizenship Studies: Policy Causes and Consequences.” *Annual Review of Political Science* 26 (1): 135–52. <https://doi.org/10.1146/annurev-polisci-051921-102729>.
- Hammar, Tomas. 1985. “Dual Citizenship and Political Integration.” *International Migration Review* 19 (3): 438–450.
- . 1990. *Democracy and the Nation State: Aliens, Denizens and Citizens in a World of International Migration*. Avebury: Aldershot.
- Handoll, John. 2010. *EUDO Citizenship Observatory. Country Report: Ireland*. Florence: EUI.
- Joppke, Christian. 2003. “Citizenship between De- and Re-Ethnicization.” *European Journal of Sociology* 44 (3): 429–58. <https://doi.org/10.1017/S0003975603001346>.
- Lafleur, Jean-Michel. 2015. “The Enfranchisement of Citizens Abroad: Variations and Explanations.” *Democratization* 22 (5): 840–60. <https://doi.org/10.1080/13510347.2014.979163>.
- Linquiti, Peter. 2024. “Operationalizing Lasswell’s Call for Clarification of Value Goals: An Equity-Based Approach to Normative Public Policy Analysis.” *Policy Sciences* 57 (1): 193–219. <https://doi.org/10.1007/s11077-024-09525-w>.
- Lopez-Guerra, Claudio. 2005. “Should Expatriates Vote?” *Journal of Political Philosophy* 13 (2): 216–34. <https://doi.org/10.1111/j.1467-9760.2005.00221.x>.
- Masing, Johannes. 2001. *Wandel im Staatsangehörigkeitsrecht vor den Herausforderungen moderner Migration*. Tübingen: Mohr Siebeck.
- Miller, David. 2020. “Reconceiving the Democratic Boundary Problem.” *Philosophy Compass* 15 (11): 1–9. <https://doi.org/10.1111/phc3.12707>.

- Orgad, Liav. 2019. "The Citizen-makers: Ethical Dilemmas in Immigrant Integration." *European Law Journal* 25 (6): 524–43.  
<https://doi.org/10.1111/eulj.12338>.
- Owen, David. 2012. "Constituting the Polity, Constituting the Demos: On the Place of the All Affected Interests Principle in Democratic Theory and in Resolving the Democratic Boundary Problem." *Ethics & Global Politics* 5 (3): 129–52.  
<https://doi.org/10.3402/egp.v5i3.18617>.
- Peters, Floris, Maarten Vink, and Hans Schmeets. 2016. "The Ecology of Immigrant Naturalisation: A Life Course Approach in the Context of Institutional Conditions." *Journal of Ethnic and Migration Studies* 42 (3): 359–81.  
<https://doi.org/10.1080/1369183X.2015.1103173>.
- Sejersen, Tanja Brøndsted. 2008. "'I Vow to Thee My Countries' - The Expansion of Dual Citizenship in the 21st Century." *International Migration Review* 42 (3): 523–49. <https://doi.org/10.1111/j.1747-7379.2008.00136.x>.
- Shapiro, Ian. 2003. *The State of Democratic Theory*. Princeton/Oxford: Princeton University Press.
- Solano, Giacomo, and Thomas Huddleston. 2020. "Migrant Integration Policy Index 2020." Brussels/Barcelona. <https://www.mipex.eu/>.
- Song, Sarah. 2012. "The Boundary Problem in Democratic Theory: Why the Demos Should Be Bounded by the State." *International Theory* 4 (1): 39–68.  
<https://doi.org/10.1017/S1752971911000248>.
- Spiro, Peter J. 2011. "A New International Law of Citizenship." *The American Journal of International Law* 105 (4): 694–746.
- Trimikliniotis, Nicos. 2015. *EUDO Citizenship Observatory: Report on Citizenship Law: Cyprus*. Florence: EUI.
- Umpierrez de Reguero, Sebastian, and Maarten Vink. 2025. "Pathways to External Citizenship: The Global Extension of Dual Citizenship and Voting from Abroad." *Journal of Ethnic and Migration Studies*, September, 1–25.  
<https://doi.org/10.1080/1369183X.2025.2550124>.

- Vink, Maarten, Luuk van der Baaren, Rainer Bauböck, Jelena Džankić, Iseult Honohan, and Bronwen Manby. 2023. "GLOBALCIT Citizenship Law Dataset, v2.0, Country-Year-Mode Data ([Acquisition]/[Loss])." Florence. <https://hdl.handle.net/1814/73190>.
- Vink, Maarten, Gerard-René de Groot, and Ngo Chun Luk. 2015. "MACIMIDE Global Expatriate Dual Citizenship Dataset. Harvard Dataverse, V5 [2020]." Maastricht. <http://dx.doi.org/10.7910/DVN/TTMZ08>.
- Vink, Maarten, Arjan H. Shakel, David Reichel, Ngo Chun Luk, and Gerard-Rene De Groot. 2019. "The International Diffusion of Expatriate Dual Citizenship." *Migration Studies* 7 (3): 362–83. <https://doi.org/10.1093/migration/mnz011>.
- Wegschaidt, Klaudia, Sebastián Umpierrez de Reguero, and Rainer Bauböck. 2025. "Migrant Franchise Constellations. Preprint [Accessed 29 September 2025]." <https://doi.org/10.33774/apsa-2025-fb517>.
- Weimer, David Leo. 2002. "Enriching Public Discourse: Policy Analysis in Representative Democracies." *The Good Society* 11 (1): 61–65. <https://doi.org/10.1353/gso.2002.0020>.
- Wellman, Elizabeth Iams, Nathan W. Allen, and Benjamin Nyblade. 2023. "The Extraterritorial Voting Rights and Restrictions Dataset (1950–2020)." *Comparative Political Studies* 56 (6): 897–929. <https://doi.org/10.1177/00104140221115169>.
- Whelan, Frederick G. 1983. "Prologue: Democratic Theory and the Boundary Problem." *Nomos* 25: 13–47.
- Winter, Elke. 2014. "Traditions of Nationhood or Political Conjuncture? - Debating Citizenship in Canada and Germany." *Comparative Migration Studies* 2 (1): 29–55. <https://doi.org/10.5117/CMS2014.1.WINT>.

### **3. Barriers to Naturalization: How Dual Citizenship Restrictions Impede Full Membership. (Article 2)**

This article is published as follows:<sup>i</sup>

Weinmann, Martin. 2022: “Barriers to Naturalization: How Dual Citizenship Restrictions Impede Full Membership.” *International Migration* 60 (5): 237–251.

It is accessible here: <https://doi.org/10.1111/imig.12950>

#### **Abstract**

Dual citizenship restrictions are widely recognized as one of the major barriers for immigrant naturalization. Yet, we know surprisingly little about what drives migrants’ concerns about trading off their former citizenship for a new one. This paper aims at closing this gap by analyzing the interrelation between dual citizenship policies and naturalization outcomes on basis of original survey data from Germany. I examine how dual citizenship restrictions as well as subjectively perceived barriers concerning acceptance and belonging regarding citizenship change drive immigrants’ naturalization decisions. Using cluster-robust logistic regression models clustered by origin country, I find that the requirement of giving up one's original citizenship for naturalization impedes immigrants’ naturalization decisions and that perceived barriers concerning acceptance and belonging are also relevant for long-term exclusion from full membership in the destination country.

### 3.1 Introduction

The access to citizenship has an important impact on immigrants' opportunities in their country of residence. Several researchers have shown positive outcomes of naturalization for immigrants' socio-economic and social integration, for example regarding the access to the labor market, wages, political knowledge and participation as well as identification with the country of residence (e.g., Bevelander and Pendakur 2011; Fick 2016; Hainmueller, Hangartner, and Pietrantuono 2015; Steinhardt 2012).<sup>ii</sup> Moreover, naturalization currently remains the only serious option for immigrants to acquire national voting rights in most polities since denizen enfranchisement usually contributes to democratization at the local level only (Pedroza 2015). Thus, barriers to naturalization impede immigrants' ability to integrate and fully participate in their country of residence.

Against this background, researchers identified several "legal and bureaucratic barriers to naturalization" (Bloemraad 2006, 928). These are, for example, the legal and institutional context in the country of descent as well as the country of residence, naturalization requirements, dual citizenship regulations and policies, or bureaucratic hurdles like long processing times or administrative costs and fees (e.g., Bloemraad 2006; Freeman et al. 2002; Hainmueller et al. 2018; Jones-Correa 2001b; Peters, Vink, and Schmeets 2016; Spiro 1999). In this context, the requirement of giving up the original citizenship has been described as one of the most important legal barriers for immigrant naturalization (e.g., Faist 2004; Hammar 1985). However, "empirical findings regarding the impact of dual citizenship toleration are ambiguous" (Peters, Vink, and Schmeets 2016, 361)). One reason might be that citizenship has to be understood as a multi-dimensional concept which is more than just a set of rights, but rather "a legal status and identity" defining membership (Joppke 1999, 630). This means that citizenship can also be a symbol of belonging. Regarding the necessity of giving up the original citizenship for naturalization, legal aspects of membership are merged with emotional aspects what raises the costs of naturalization (e.g., Hammar 1985). This conglomerate of aspects may be one reason why we still know surprisingly little about what drives migrants' concerns about trading off their original citizenship for a new one. Does only the legal restriction play a role or are subjectively perceived barriers concerning acceptance and membership regarding citizenship change relevant as well?

This paper takes a closer look at this question with special regard to dual citizenship policies in origin and destination countries as well as immigrants' individual desires regarding citizenship retention. First, I examine how dual citizenship options drive immigrants' naturalization decisions, taking into account subjectively perceived barriers concerning acceptance and belonging regarding citizenship change. Secondly, I take a closer look at the individual importance of giving up the original citizenship for long-term immigrants' decision not to acquire their destination country's citizenship, taking also into consideration subjectively perceived barriers concerning acceptance and belonging. This allows me to obtain a generalizable picture about the importance of dual citizenship restrictions and individual perceptions to citizenship change.

I use survey data from Germany to answer this research question. Germany is a suitable case to study the interrelation between naturalization and dual citizenship restrictions for multiple reasons: Historically, Germany is known for its comparatively restrictive approach to citizenship acquisition as well as dual citizenship. The country only began to slowly liberalize both aspects in the late 1990s. Nevertheless, dual citizenship is still not accepted in general and tolerance of dual citizenship as well as facilitating naturalization are often negatively debated, for example in the run-up to the 2017 parliamentary elections (e.g., Baldi and Goodman 2015; The Telegraph 2017). Due to several amendments of the 2000 Nationality Act, today German citizenship law is marked by a "dual-passport asymmetry" (Expert Council on Integration and Migration 2015, 18) in several respects: Dual citizenship is usually accepted when citizenship is acquired through birth, but only exceptionally if German citizenship is acquired through naturalization. Regarding the latter, dual citizenship acceptance varies depending on the immigrants' countries of origin. This makes it possible to study the impact of different dual citizenship regulations within a single country. Nevertheless, even though Germany is a unique case in Europe and across the world regarding citizenship policies, it is one example for several countries which still do not fully accept dual citizenship. In Europe, for example, renunciation or automatic loss of citizenship of another country is also a condition for naturalization in Austria, Bulgaria, Croatia, Estonia, Latvia, Lithuania, the Netherlands, Slovenia and Spain.<sup>iii</sup>

Following, I first provide an overview of the conditions of dual citizenship in Germany, before I discuss empirical findings on the relation between dual citizenship and

naturalization. Then, I present the underlying theoretical considerations of my analyses. Next, I describe my data and measurement and present my analyses. Finally, I summarize and discuss the results which show that the requirement of giving up one's original citizenship for naturalization impedes individual naturalization decisions even if other individual aspects are considered.

### **3.2 Dual citizenship in Germany**

In Germany, which has been described as an “ethnic” nation, “the automatic transformation of immigrants into citizens [...] [was] unthinkable” (Brubaker 1992, 185) for a long time since citizenship was solely based on descent (*ius sanguinis*). Although immigrants had the opportunity to acquire citizenship through naturalization on discretionary decision, they did not have any legal claim up to the early 1990s when Germany began to slowly reform its citizenship regulations (e.g., Green 2001).<sup>iv</sup> However, a real paradigm shift did not take place until a fundamental reform in 1999 (e.g., Joppke 2003). It introduced the possibility of acquiring German citizenship through birth on territory for children of foreign parents (*ius soli*), but also significantly reduced the requirements for naturalization, for example the mandatory residence period. Even though the original bill of the Coalition between the Social Democratic Party (SPD) and the Green Party also provided for the broad acceptance of dual citizenship, the final proposal of the Nationality Act did not allow dual citizenship in general. This was preceded by an intensive political debate and a change in the majority in the *Bundesrat*, the upper house of the German parliament, whose approval was required for the reform of the Nationality Act. Regarding naturalization, the law even contains a tightening by closing a legal loophole concerning dual citizenship: The so-called domestic clause was abolished. This clause had previously enabled naturalized immigrants to circumvent the existing requirement to renounce their foreign citizenship for naturalization by reacquiring their original citizenship after naturalization (Falcke and Vink 2020; Farahat and Hailbronner 2015).

Nevertheless, the Nationality Act coming into force on 1 January 2000 did not prohibit dual citizenship for immigrants of all countries equally. Naturalized EU citizens (as well as citizens of Switzerland) were initially allowed to keep their citizenship under the condition of reciprocity of treatment (i.e., if the respective country also allows dual

citizenship for Germans). Amendments in the aftermath of the 1999 citizenship reform even led to a general acceptance of dual citizenship for immigrants from these countries since 2007. In contrast, immigrants from non-EU countries still have to give up their foreign citizenship for naturalization. Dual citizenship for non-EU citizens is only possible in exceptional cases, for example if it is impossible to give up the origin country's citizenship or if the origin country regularly rejects a release.<sup>v</sup> Moreover, it is not required that recognized refugees have to give up their original citizenship.

In contrast, dual citizenship is generally accepted if citizenship is acquired by birth, for example for children born to binational parents. Moreover, since the Nationality Act came into force in 2000, children born in Germany to foreign parents automatically acquire the German as well as their parents' citizenship if at least one parent has been a legal resident for a period of eight years and holds an unlimited right of residence (conditional *ius soli*). Until the end of 2014, these children had to decide by the age of 23 between their German citizenship and the citizenship passed down to them by their parents (known as *Optionspflicht*, the “duty to choose”). This requirement has been abolished through an amendment in 2014 (for a detailed discussion see Winter, Diehl, and Patzelt 2015; Worbs 2014).

As a consequence to the aforementioned exceptions, dual citizenship rates vary considerably between naturalized immigrants from different countries of origin: While in 2020, for example, 100 per cent of all naturalized Iranians and 99 per cent of all naturalized EU citizens retained their original citizenship, 90 per cent of all people of Turkish origin had to renounce their Turkish citizenship for naturalization (Destatis 2021a). In 2020, there were approximately 2.9 million foreign nationals living in Germany who fulfilled the minimum length of residence required for naturalization, but whose citizenship may not be retained due to one of the aforementioned exceptions (Destatis 2021b; own calculations).

### **3.3 Empirical findings on naturalization and dual citizenship**

The question of the effects of dual citizenship policies has been tackled with various empirical approaches and has produced different and sometimes contradicting results.

Research on migration flows suggests that migrants are well informed about dual citizenship opportunities and that these opportunities influence their decision to move to

a country: Sending states allowing for dual citizenship experience more emigration than countries not allowing dual citizenship and migration flows are higher to countries allowing dual citizenship than to countries forbidding dual citizenship. Moreover, migration flows are the highest between sending and receiving states allowing dual citizenship and lowest between sending states prohibiting and receiving states allowing dual citizenship (Alarian and Goodman 2017).

Studies focusing on naturalization rates of different immigrant groups have obtained contradictory results regarding the effect of dual citizenship policies on immigrant naturalization. Several researchers study the effect of legal requirements in the countries of origin and find that immigrants coming from countries that recognize dual citizenship are less likely to be naturalized in countries that generally accept dual citizenship than those who come from countries not recognizing dual citizenship (DeVoretz 2008; Dronkers and Vink 2012; Yang 1994b). Other authors find higher naturalization rates for those who are allowed to retain citizenship, either through legal requirements in the origin country and/or the country of residence (Chiswick and Miller 2009; Mossaad et al. 2018; Vink, Prokic-Breuer, and Dronkers 2013). Still others confirm this only for few immigrant groups (Helgertz and Bevelander 2017; Logan, Oh, and Darrah 2012).

Results from studies focusing on policy changes are more unanimous regarding the effect of dual citizenship policies on immigrant naturalization. Multivariate studies on policy changes in origin countries find “relatively small, but positive, effects” (Jones-Correa 2001a, 1023) for immigrants living in countries that generally allow dual citizenship after their countries of origin recognized dual citizenship. Research on these policy changes finds not only positive effects of dual citizenship on immigrant naturalization, but also indicates positive effects on immigrants’ socio-economic integration, for example employment and wages (Mazzolari 2009). Regarding policy changes in immigration countries, studies find that immigrant naturalization increased when dual citizenship was accepted and decreased when dual citizenship was abolished (e.g., Bevelander and Veenman 2006; Böcker and Thränhardt 2006; Labussière and Vink 2020; Vink et al. 2021; see Falcke and Vink 2020 for other findings).

Immigrant surveys show that immigrants who have to renounce their original citizenship before acquiring their country of residence's citizenship see renunciation as one

of the biggest obstacles and that origin country tolerance of dual citizenship is correlated with immigrants' interest in naturalization in the country of residence (e.g., Chavez 1997; Huddleston 2020; Huddleston and Tjaden 2012). Regarding the German case, where dual citizenship is not generally accepted, surveys regularly show that immigrants see this restriction as one of the most important barriers for naturalization (e.g., Venema and Grimm 2002; Weinmann, Becher, and Babka von Gostomski 2012). Nevertheless, few surveys also show that some immigrants do not have a problem with giving up citizenship and others decide to naturalize even though they have a problem with giving up citizenship (e.g., Diehl and Blohm 2001; Weinmann, Becher, and Babka von Gostomski 2012). Other surveys suggest that "the rejection of dual citizenship seems to be so deeply entrenched in Germany that even those who by law are eligible to hold two passports are not aware of their right or avoid its application with an eye towards the significant effort required to do so" (Fick 2016, 118, author's translation; see also Weinmann, Becher, and Babka von Gostomski 2012; Fick et al. 2014).

As has been shown, research results regarding the effect of dual citizenship policies on immigrants' naturalization behavior are partly inconsistent. One reason might be that assuming all immigrants would acquire citizenship if they would be able to keep their original citizenship underestimates that naturalization decisions do not only depend on the legal ability to naturalize.

### **3.4 Theoretical background**

Understanding citizenship as a legal status and identity (Joppke 1999) implies that citizenship not only defines membership legally, but is also a symbol of membership. Thus, it can be assumed that there are not only legal barriers for naturalization, but also perceived barriers regarding membership conceptions, acceptance and feelings of belonging. Regarding these aspects of naturalization, the theory of ethnic boundary making is useful since it takes into account aspects of membership and affiliation (e.g., Diehl and Blohm 2003, 2011; Witte 2014, 2018).

Ethnic boundary making can be described as drawing, maintaining and changing boundaries between ethnic or national groups (e.g., Wimmer 2008). These boundaries

are institutionally and socially created and shaped from both the origin and the destination context. It can be distinguished between legal and symbolic boundaries. This distinction makes the theory useful for analyzing legal barriers to naturalization and perceived barriers regarding membership conceptions, acceptance and feelings of belonging. Regarding citizenship acquisition, legal boundaries for example describe policies or legal preconditions for legal membership acquisition like the necessity of giving up the original citizenship for naturalization. Symbolic boundaries can be defined as socially created distinctions that “separate people into groups and generate feelings of similarity and membership” (Lamont and Molnár 2002, 168). These symbolic aspects of membership, like the prevailing definition of belonging in a national context, are mostly based on individual's feelings, perceptions and expectations (e.g., Witte 2018).

Naturalization under the condition of giving up the origin country's citizenship can be described as a form of individual boundary crossing (Alba 2005; Diehl and Blohm 2011), since

“the boundary is bright and thus there is no ambiguity in the location of individuals with respect to it. In this case, assimilation is likely to take the form of boundary crossing and will generally be experienced by the individual as something akin to a conversion, i.e., a departure from one group and a discarding of signs of membership in it, linked to an attempt to enter into another, with all the social and psychic burdens a conversion process entails: growing distance from peers, feelings of disloyalty, and anxieties about acceptance” (Alba 2005, 24).

The latter can for example be the case if the origin group opposes naturalization or a lack of acceptance in the country of residence. For Germany, previous research showed that it is important for citizenship decisions whether the family supports or opposes the decision (e.g., Diehl and Fick 2012; Worbs 2014). Furthermore, it has been shown that some young immigrants believe that having German citizenship would not change the perceptions of the native German majority about them and that they would still be excluded and discriminated against (Çelik 2015).

Against this background, it can be assumed that there are not only legal barriers for naturalization like the necessity of giving up the original citizenship, but also subjectively perceived barriers regarding membership conceptions, acceptance and feelings of belonging. Moreover, it can be assumed that these perceived barriers are especially relevant for those immigrants who have a problem with giving up their original citizenship for naturalization. Thus, two aspects should be considered regarding naturalization and dual citizenship: (1) legal barriers in the origin country and the country of residence for retaining the original citizenship and (2) subjectively perceived barriers concerning acceptance and belonging regarding the origin as well as the residence context.

Based on the above, my hypotheses are as follows:

Hypothesis 1: *Immigrants who are able to retain their original citizenship are more likely to naturalize than immigrants who are not able to retain their original citizenship.*

Hypothesis 2a: *Immigrants who perceive barriers concerning acceptance and belonging are less likely to naturalize under the condition of giving up their original citizenship than immigrants not perceiving these barriers.*

Hypothesis 2b: *Immigrants who perceive barriers concerning acceptance and belonging are more likely to desire to retain their original citizenship than immigrants not perceiving these barriers.*

### **3.5 Data and analysis**

#### *Data*

In order to study how dual citizenship restrictions and individual perceptions drive naturalization decisions, I use data from the 2011 BAMF Naturalisation Study, a cross-sectional survey of the immigrant population in Germany (see Weinmann, Becher, and Babka von Gostomski 2012). It was designed for a comparison of (1) first and second generation immigrants who were naturalized between 2005 and the time of the survey (2011), (2) immigrants undergoing the naturalization process at the time of the survey and (3) immigrants who fulfil the necessary residence requirements for naturalization

at the time of the survey (i.e., have been living in Germany for at least eight years and have a secure residence status), but did not yet naturalize (non-naturalized immigrants). The random sampling for all three target groups was devised disproportionately, in order to warrant a sufficient basis of survey interviews for the five most important regions of origin of naturalized and non-naturalized persons living in Germany (i.e., Turkey, successor states to the former Yugoslavia, Greece/Italy, Afghanistan/Iran/Iraq and Russian Federation/Ukraine/Belarus). All in all there are 17 countries of origin represented in the sample (see Appendix II: Table A2.2). To ensure a representative analysis, the data are weighted on the basis of information from official statistics for naturalizations and foreign nationals in Germany. All naturalized immigrants were 18 or older at the time of their naturalization to ensure that they did not co-naturalize with their parents. All other interviewees were 18 or older at the time of the survey (for a more detailed overview about data collection and sampling see Appendix II: Annex A2.1).

A strength of the survey is that it provides data for immigrants who actively and consciously decided to acquire their country of residence's citizenship as well as immigrants who did not naturalize but fulfil important requirements for naturalization. Furthermore, the data allow an isolated analysis of the question whether giving up the original citizenship is seen as a problem for naturalization or not. The data include first and second generation immigrants. Second generation immigrants in the sample are born between 1944 and 1993. Thus, they could not benefit from the conditional *ius soli* which was introduced in German nationality law in 2000. Therefore, regarding the acquisition of citizenship, second generation immigrants in the sample are comparable with first generation immigrants since their only option to acquire German citizenship is naturalization.

Another strength of the survey is detailed information about the immigrants' countries of origin. This makes it possible to include information on countries of origin, like information about the possibility of dual citizenship. All in all dual citizenship is possible for immigrants from four countries of origin in the sample. These are immigrants from Greece and Italy who are allowed to retain their original citizenship due to special regulations for EU citizens. Moreover, immigrants from Afghanistan and Iran are al-

lowed to retain their original citizenship since German authorities know that citizenship renunciations are “never or hardly ever” accepted in these countries (for further information see Appendix II: Annex A2.2 and Table A2.2).

### *Measures*

#### Dependent variables

My analyses focus on two outcome variables: In a first step, I examine how dual citizenship options drive long-term immigrants’ naturalization decisions, taking into account subjectively perceived barriers concerning acceptance and belonging regarding citizenship change. In the next step, I take a closer look at the individual importance of giving up the original citizenship for long-term immigrants’ decision not to acquire their destination country’s citizenship: Among those immigrants who have not yet naturalized or applied for naturalization, I analyze the interrelation between long-term immigrants’ decisions not to acquire their destination country’s citizenship under the condition of giving up their original citizenship and the aforementioned subjectively perceived barriers. The two dependent variables are operationalized and analyzed as follows:

*Analysis 1:* Naturalization decision is coded as a binary variable indicating whether an immigrant actively and consciously decided for naturalization or not (0 = no; 1 = yes). Naturalized immigrants and immigrants going through the naturalization process are treated as one group. Immigrants from both groups have taken a conscious decision to naturalize and applied for naturalization. Even though the authorities have not yet decided on the application in the latter case, rejection rates in Germany are comparatively low (e.g., Behörde für Inneres und Sport 2020; Regierungspräsidium Darmstadt 2019). Conversely, it is assumed that non-naturalized immigrants are denizens who are eligible for naturalization and deliberately decided not to naturalize (see for this interpretation Bauböck 2007). At the time of taking part in the survey, they were fulfilling the necessary residence requirements for naturalization since they had been living in Germany for at least eight years and had a secure residence status.

*Analysis 2:* The individual importance of giving up the original citizenship for long-term immigrants' decision not to acquire their destination country's citizenship is analyzed through the desire to retain the original citizenship as a reason against naturalization. This analysis focusses on the subsample of non-naturalized immigrants. The analysis includes immigrants who are able to retain their original citizenship and immigrants who are not since survey results indicate that those who are able to have dual citizenship are not necessarily aware of their right (e.g., Fick et al. 2014; Weinmann, Becher, and Babka von Gostomski 2012). Non-naturalized immigrants were given different statements on potential reasons against naturalization. One reason was "I want to retain my original citizenship." Then, they were asked whether these reasons are of importance for them or not. The response categories range from "very important" (1) to "not important" (4). The categories are summarized to a binary variable that indicates whether an immigrant has a desire to keep the original citizenship (1) or not (0; for further information on operationalization and coding see Appendix II: Table A2.1). In both analyses, I conduct logistic regression models that will be described after the presentation of the explanatory and control variables.

#### Explanatory and control variables

In *Analysis 1*, I consider two types of explanatory variables: (1) legal barriers concerning dual citizenship and (2) subjectively perceived barriers concerning acceptance and belonging regarding citizenship change.

*Legal barriers* concerning dual citizenship are measured through the possibility of dual citizenship. This variable has been coded for origin countries in the sample based on different sources. It shows whether immigrants from a certain country are able to have dual citizenship or not when they naturalize in the country of residence. The variable includes information on both legal contexts: official information from the German Federal Ministry of the Interior whether immigrants from certain countries are exceptionally allowed to retain their original citizenship when they acquire German citizenship (see Appendix II: Annex A2.3) as well as information on origin country rules regarding loss or renunciation of citizenship after voluntarily acquiring another citizenship based on the MACIMIDE Global Expatriate Dual Citizenship Database (Vink,

De Groot, and Luk 2015). Regarding naturalized immigrants, I use the respective information for the year in which an individual has been naturalized for coding. As for immigrants undergoing the naturalization process and non-naturalized immigrants, I use the respective information for the time of the survey in 2011. Possibility of dual citizenship is coded “yes” (1) if citizenship retention is possible due to regulations in the receiving country and if there is no automatic loss of the origin country's citizenship when the receiving country's citizenship is voluntarily acquired. The variable is coded “no” (0) if citizenship retention is not possible in the receiving country and the origin country's citizenship is automatically lost when the receiving country's citizenship is voluntarily acquired. The same applies if citizenship retention is not possible in the receiving country even if the origin country's citizenship is not automatically lost when the receiving country's citizenship is voluntarily acquired (for an overview about coding see Appendix II: Annex A2.2 and Table A2.2).

For *subjectively perceived barriers* concerning acceptance and belonging regarding citizenship change, I include different operationalizations to take into account perceived barriers regarding the destination and the origin context. These aspects are measured through statements reflecting individual's feelings, perceptions and expectations. The perception of acceptance through the residence country's majority is used to measure a subjectively perceived barrier regarding the destination context. The variable indicates whether an individual believes that he or she is perceived as a foreigner in the country of residence. The variable is useful to measure residence context-related perceived barriers regarding citizenship change since research has shown that some immigrants believe that acquiring the residence country's citizenship would not change the native German majority's perceptions about them. The statement that a person's family is opposed to naturalization is used to measure subjectively perceived barriers regarding the origin context. Opposing naturalization is synonymous with opposing citizenship change due to the existing dual citizenship restrictions regarding naturalization in the German case.

*Control variables:* In the 2011 BAMF Naturalisation Study, it was assumed that non-naturalized immigrants would be eligible for naturalization if they fulfil the necessary residence requirements for naturalization. Since proof of German language proficiency is a further requirement for naturalization in Germany, I use German language skills as a control variable for integration requirements. The individual level of integration

is an important determinant for naturalization as has been shown before (e.g., Bernard 1936; Liang 1994; Yang 1994b). Studies also show the importance of social identity and symbolic aspects of membership for naturalization (e.g., Diehl and Blohm 2003; Hochman 2011; Maehler, Weinmann, and Hanke 2019). Therefore, an item indicating whether a person feels a greater affinity with the origin country or the country of residence (or feels affiliated with both countries equally) is included in the analysis. A further control variable is included measuring the potential benefit from naturalization since some researchers show a relationship between immigrants' naturalization intentions and perceived costs and benefits (e.g., Garcia 1981; Witte 2014, 2018). This variable is based on the Quality of Nationality Index for 2011 (Kochenov and Lindeboom 2019; for further information see Appendix II: Annex A2.2) and describes the quality of the original citizenship in relationship to the quality of the country of residence's citizenship (i.e., difference between values). The intention to stay in the receiving country is also positively correlated to immigrants' naturalization behavior; the length of stay in the receiving country has an ambivalent impact: some authors find positive correlations between the duration of stay and naturalization or the intention to naturalize, and some find negative effects for immigrants with a very long stay (e.g., Constant, Gataullina, and Zimmermann 2009; Diehl and Blohm 2003; Evans 1988; Yang 1994a). Against this background, the intention and the length of stay in the receiving country are included in the analysis. Furthermore, sex serves as control variable. Appendix II: Table A2.3 gives an overview of the sample characteristics regarding all individual level variables. For further information on operationalization and coding, see Appendix II: Annex A2.2 and Table A2.1 and A2.2.

Including information on the origin country level in the analysis of the survey data results in a hierarchical data structure with immigrants nested in 15 origin countries (Appendix II: Table A2.2). Due to the limited number of contextual units, I conduct a cluster-robust logistic regression model clustered by origin country. 1,046 cases are included in the regression analysis due to listwise deletion.

In *Analysis 2*, I focus on subjectively perceived barriers concerning acceptance and belonging regarding citizenship change. These are measured similarly to my first analysis: the perception of being seen as a foreigner (destination context), the perception that one's family opposes naturalization (origin context).

Again, German language skills, identification with the origin country and the country of residence, perceived benefits from naturalization, length of stay, the intention to stay and sex serve as control variables. Due to the limited sample size, I conduct a cluster-robust logistic regression clustered by origin country, but without including origin context variables. Perceived benefit from naturalization is measured through the subjective expectation whether naturalization brings individual benefits or not. 361 cases are included in the regression analysis due to listwise deletion. For an overview of the sample characteristics see Appendix II: Table A2.3, for further information on operationalization and coding, see Appendix II: Table A2.1.

### *Analyses and findings*

#### Analysis 1

Figure 3.1 visualizes the main results from the cluster-robust logistic regression model with “naturalization decision” as the dependent variable (0 = no; 1 = yes) clustered by origin country (full details are provided in Appendix II: Table A2.4). The model shows immigrants able to keep their original citizenship are more likely to decide for naturalization than immigrants who have to give up their original citizenship for naturalization (*H1*). The wide confidence intervals may be a sign for a possible effect heterogeneity due to the limited variation of origin countries in the sample. In the group of immigrants able to retain their citizenship, immigrants from Greece and Italy, for example, may be less likely to naturalize compared to immigrants from Afghanistan and Iran whose legal benefits from naturalization are larger. My hypothesis regarding perceived barriers can only be confirmed to a limited extent (*H2a*). I find that only perceived barriers concerning acceptance and belonging regarding the origin context are relevant for citizenship change: While naturalization decisions are less likely for those immigrants whose family opposes naturalization, the perception of acceptance through the residence country's majority is not that relevant. Whether an individual believes that he or she is perceived as a foreigner in the country of residence is not significantly correlated to naturalization.

I controlled for further important determinants of immigrant naturalization: The residence country's language proficiency as a proxy for requirements regarding the individual level of integration is positively correlated to naturalization decisions. Immigrants who identify with the country of residence or at least equally with their origin country and the country of residence are more likely to naturalize than immigrants who identify with their origin country only. Taking into account the quality of nationality shows that immigrants are more likely to decide for naturalization if they can expect higher legal benefits from naturalization since the difference between the value of the destination country's citizenship and their origin country's is higher. The intention to stay in the receiving country is positively correlated to naturalization what is in line with previous studies. Regarding length of stay, my analysis also confirms the results of other studies: a very long stay in the country (i.e., at least 25 years) is negatively correlated to naturalization decisions. This effect has been explained by the fact that immigrants who have resided in the country for a long time without citizenship “learn to live without it and see no advantage in changing their citizenship status” (Constant, Gataullina, and Zimmermann 2009, 80; see also Diehl and Blohm 2003). There are no significant effects for sex. Several robustness checks are presented in Appendix II: Annex A2.3.

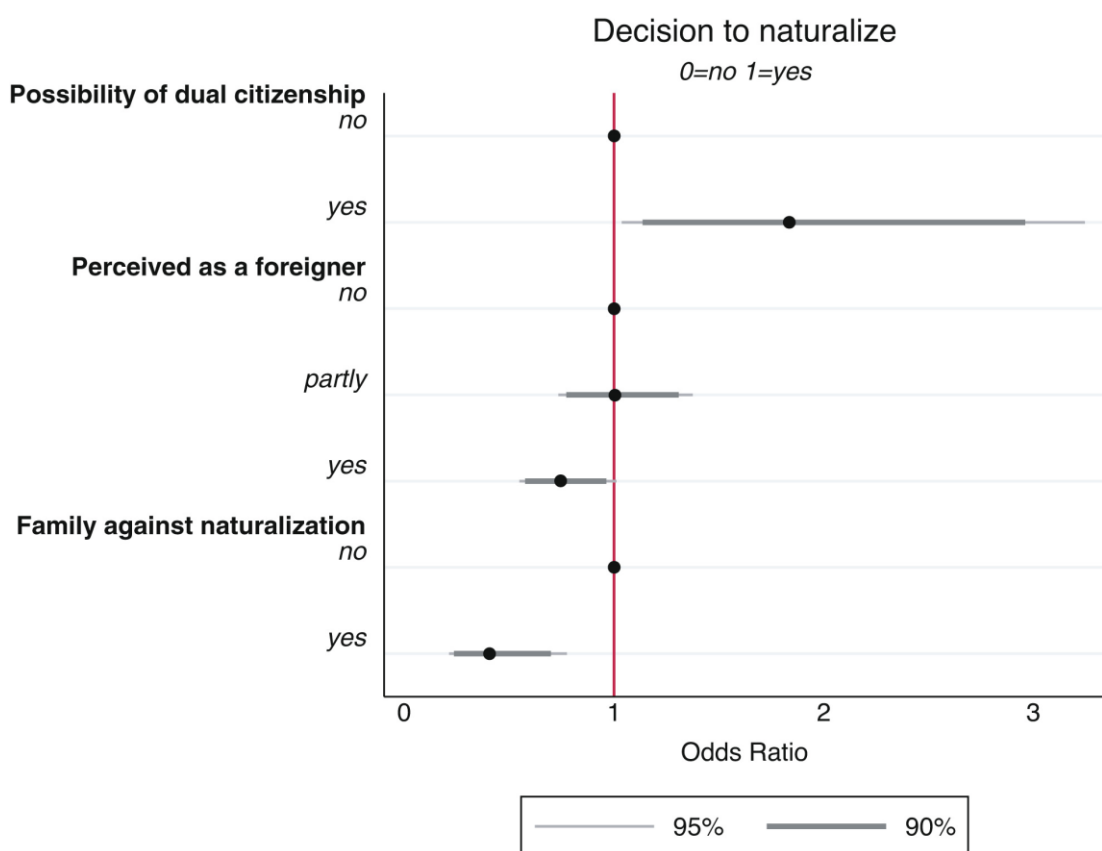
## Analysis 2

Figure 3.2 visualizes the main results from the cluster-robust logistic regression model with “desire to retain the original citizenship” as the dependent variable (0 = no; 1 = yes) clustered by origin country (full details are provided in Appendix II: Table A2.5). My hypothesis can only be partially confirmed (*H2b*): Giving up the original citizenship appears to be a problem for non-naturalized immigrants who perceive origin context-related barriers, but not for those who perceive destination context-related barriers. Non-naturalized immigrants who have family members opposing naturalization, and thus citizenship change, are significantly more likely to desire to retain their origin country's citizenship. Perceived barriers regarding the destination context are not significantly correlated with the desire to retain the original citizenship.

Furthermore, non-naturalized immigrants who identify with the residence country or at least with their origin country and the residence country are less likely to desire retaining their original citizenship than those who identify with their origin country

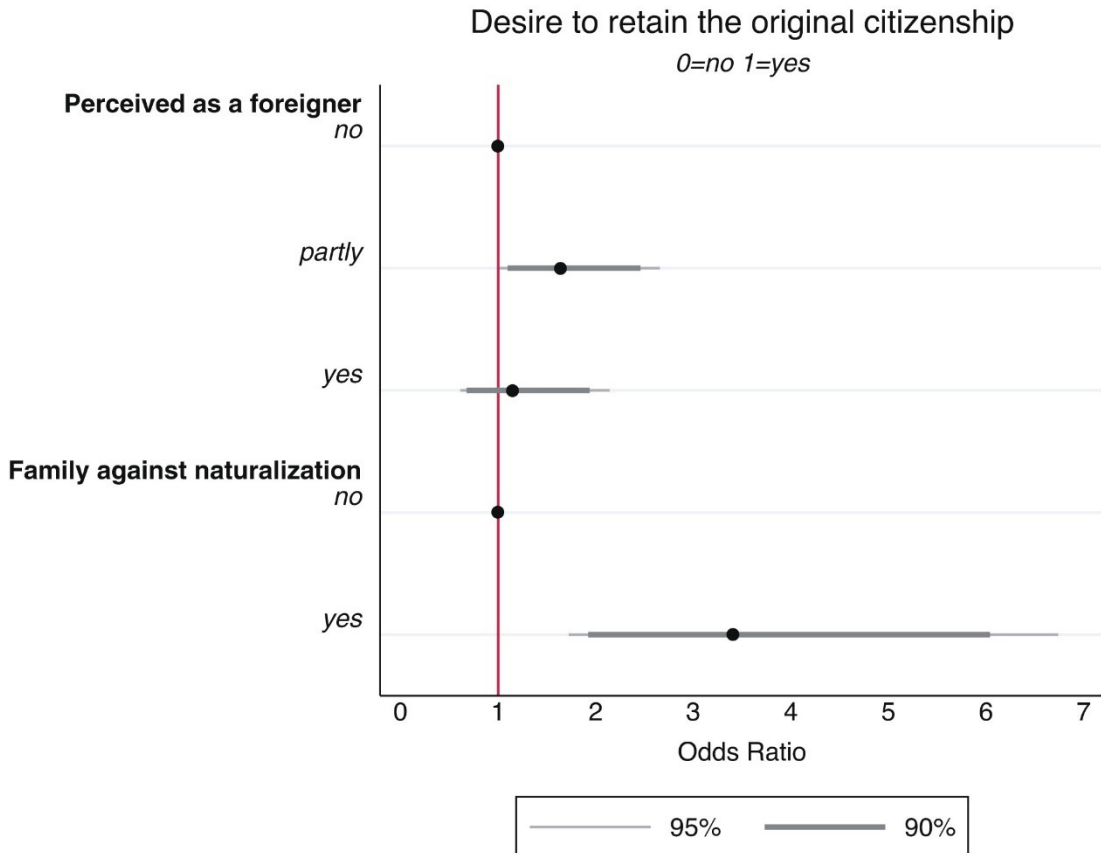
only. There is no significant effect for the subjective expectation of benefits through naturalization. Moreover, the analysis shows that a stay of under 25 years is negatively correlated to the desire to retain the origin country's citizenship. However, there is no significant effect for the intention to stay. The same applies to sex and the individual level of integration measured through residence country language skills. Several robustness checks are presented in Appendix II: Annex A2.3.

**Figure 3.1: Main results of the cluster-robust logistic regression on decision to naturalize clustered by origin country (N = 1,046).**



*Note:* Control variables: residence country language proficiency, identification, difference in quality of nationality, sex, length of stay, intention to stay. Standard errors adjusted for 15 clusters. Bars represent confidence intervals. See Appendix II: Table A2.4 for full results. Source: 2011 BAMF Naturalisation Study

**Figure 3.2: Main results of the cluster-robust logistic regression on desire to retain the original citizenship clustered by origin country (non-naturalized immigrants only, N = 361).**



*Note:* Control variables: residence country language proficiency, identification, subjective expectation of benefits through naturalization, sex, length of stay, intention to stay. Standard errors adjusted for 16 clusters. Bars represent confidence intervals. See Appendix II: Table A2.5 for full results. Source: 2011 BAMF Naturalisation Study

### 3.6 Conclusion and discussion

The most important implication of this paper is that the requirement of giving up the original citizenship is an important barrier for immigrant naturalization. However, there are further barriers regarding citizenship change besides this legal barrier. Subjectively, perceived barriers concerning acceptance and belonging regarding citizenship change are also relevant when it comes to naturalization decisions under the condition of giving up the original citizenship. Nevertheless, these perceived barriers are particularly relevant regarding the origin context. As has been shown, family resistance to naturalization is negatively correlated with the decision to acquire the residence country's citizenship, which is equivalent to citizenship change due to the existing dual citizenship restrictions in the German context. Against this, the results

suggest that residence context-related perceived barriers regarding citizenship change are not that relevant for naturalization decisions. Immigrants decide to acquire the residence country's citizenship irrespective of whether they believe to be perceived as a foreigner or not. Regarding long-term immigrants' desire to retain their original citizenship, the results show also that citizenship change appears to be a problem for non-naturalized immigrants who perceive origin context-related barriers, but not for those who perceive destination context-related barriers. The importance of country-of-origin aspects is also supported by other findings, for example, that immigrants who identify with their origin country only are less likely to naturalize than those who identify with their country of residence (or both countries equally). Even though Germany might be a very special case regarding citizenship policy, these findings are important. They suggest that especially emotional and symbolic attachment to the origin context is relevant that giving up the original citizenship is not an option for some immigrants.

With a view to the existing literature, this paper closes a gap by studying the impact of different dual citizenship options, taking also into consideration subjectively perceived barriers concerning acceptance and belonging regarding citizenship change. Bringing together survey data from Germany where dual citizenship acceptance varies depending on immigrants' countries of origin if citizenship is acquired through naturalization with origin country data regarding this variation of immigrants' legal possibility to retain their original citizenship allows an in-depth analysis of the interrelation between naturalization and dual citizenship restrictions as well as immigrants' desires concerning dual citizenship. This approach strengthens previous findings on the effect of dual citizenship restrictions by also looking for the first time at subjectively perceived barriers concerning acceptance and belonging regarding citizenship change and controlling for a variety of individual aspects identified in the literature as significant for naturalization, not only regarding sociodemographics and individual integration, but also regarding aspects of identity and utility-maximization.

Regarding practical implications in the context of immigrant integration, this paper shows that the impossibility of dual citizenship represents a barrier for the political integration of immigrants since those who have to give up citizenship are less likely

to decide for naturalization. This has significant implications for countries with exclusive naturalization policies since naturalization currently remains the only serious option for immigrants to acquire national voting rights in most polities. The basic principle of self-determination is violated if permanent immigrants are non-citizens (denizens) and thus do not have full political rights (under-inclusiveness, e.g., Bauböck 2015; Dahl 1989, 120–29). If dual citizenship is accepted, the influence of subjectively perceived origin context-related barriers, such as family resistance to naturalization, should also diminish because naturalization would no longer have to be accomplished as citizenship change. Moreover, symbolic gestures could encourage immigrants to naturalize: After the City of Hamburg's former mayor, Olaf Scholz, took the lead of the city's naturalization campaign through a personal letter inviting immigrants eligible for naturalization to acquire German citizenship, the number of immigrants becoming citizens rapidly increased in Hamburg (Cities of Migration 2014). Actively addressing and inviting immigrants to naturalize might reduce the influence of subjectively perceived barriers concerning acceptance and belonging on naturalization decisions.

---

#### Endnotes of Article 2

<sup>i</sup> Note: This paper was written and published prior to the German citizenship reform of January 2024, which resulted in dual citizenship being generally accepted. It therefore refers to the situation prior to the so-called "Act on the Modernization of Citizenship Law".

<sup>ii</sup> The survey data used in this study have been provided by the Research Centre Migration, Integration and Asylum of the German Federal Office for Migration and Refugees (BAMF) for this research. The data have been analysed only by the author mentioned in the user contract. Stata code for replication can be requested from the author. I thank Sybille Münch, Maarten Vink and Susanne Worbs for their useful comments on this paper. This paper solely reflects the personal opinion of the author.

<sup>iii</sup> See GLOBALCIT 2017; Mode A06.

<sup>iv</sup> Only *Statusdeutsche*, mostly refugees and displaced persons of German ethnicity (*Volkszugehörigkeit*), were entitled to acquire German citizenship.

<sup>v</sup> The former is generally applicable to Argentina and Bolivia, or to native citizens of Costa Rica, Ecuador, Guatemala, Honduras, Mexico, Nicaragua, Panama and Uruguay, and in certain cases Brazil and the Dominican Republic. The latter applies to Afghanistan, Algeria, Angola, Eritrea, Iran, Cuba, Lebanon, Maldives, Morocco, Nigeria, Syria, Thailand and Tunisia (Bundesministerium des Innern 2015).

### 3.7 References

- Alarian, Hannah M., and Sara Wallace Goodman. 2017. "Dual Citizenship Allowance and Migration Flow." *Comparative Political Studies* 50 (1): 133–67. <https://doi.org/10.1177/0010414015626443>.
- Alba, Richard. 2005. "Bright vs. Blurred Boundaries: Second-Generation Assimilation and Exclusion in France, Germany, and the United States." *Ethnic and Racial Studies* 28 (1): 20–49.
- Baldi, Gregory, and Sara Wallace Goodman. 2015. "Migrants into Members: Social Rights, Civic Requirements, and Citizenship in Western Europe." *West European Politics* 38 (6): 1152–73. <https://doi.org/10.1080/01402382.2015.1041237>.
- Bauböck, Rainer. 2007. "Stakeholder Citizenship and Transnational Political Participation: A Normative Evaluation of External Voting." *Fordham Law Review* 75 (5): 2393–2447.
- . 2015. "Morphing the Demos into the Right Shape. Normative Principles for Enfranchising Resident Aliens and Expatriate Citizens." *Democratization* 22 (5): 820–39. <https://doi.org/10.1080/13510347.2014.988146>.
- Behörde für Inneres und Sport. 2020. "Einbürgerungsbilanz 2019." <https://www.hamburg.de/innenbehoerde/einbuengerung/13633762/einbuengerungsbilanz-2019-hamburg/> [Accessed: 29 March 2020].
- Bernard, William S. 1936. "Cultural Determinants of Naturalization." *American Sociological Review* 1 (6): 943–53. <https://doi.org/10.2307/2084619>.
- Bevelander, Pieter, and Ravi Pendakur. 2011. "Citizenship, Co-Ethnic Populations, and Employment Probabilities of Immigrants in Sweden." *Journal of International Migration and Integration*, August. <https://doi.org/10.1007/s12134-011-0212-6>.
- Bevelander, Pieter, and Justus Veenman. 2006. "Naturalization and Socioeconomic Integration: The Case of the Netherlands. IZA Discussion Paper No. 2153." Bonn.

- Bloemraad, Irene. 2006. "Citizenship Lessons From the Past: The Contours of Immigrant Naturalization in the Early 20th Century." *Social Science Quarterly* 87 (5): 927–53. <https://doi.org/10.1111/j.1540-6237.2006.00409.x>.
- Böcker, Anita, and Dietrich Thränhardt. 2006. "Multiple Citizenship and Naturalization: An Evaluation of German and Dutch Policies." *Journal of International Migration and Integration* 7 (1): 71–94.
- Brubaker, Rogers. 1992. *Citizenship and Nationhood in France and Germany*. Cambridge, MA: Harvard University Press.
- Bundesministerium des Innern. 2015. "Vorläufige Anwendungshinweise des Bundesministeriums des Innern zum Staatsangehörigkeitsgesetz (StAG) in der Fassung des Zweiten Gesetzes zur Änderung des Staatsangehörigkeitsgesetzes vom 13. November 2014 (BGBl. I S. 1714). Stand: 1. Juli 2015." Berlin.
- Çelik, Çetin. 2015. "'Having a German Passport Will Not Make Me German': Reactive Ethnicity and Oppositional Identity among Disadvantaged Male Turkish Second-Generation Youth in Germany." *Ethnic and Racial Studies* 38 (9): 1646–62. <https://doi.org/10.1080/01419870.2015.1018298>.
- Chavez, Pablo Lizarraga. 1997. "Creating a United States-Mexico Political Double Helix: The Mexican Government's Proposed Dual Nationality Amendment." *Stanford Journal of International Law* 33 (1): 119–51.
- Chiswick, Barry R., and Paul W. Miller. 2009. "Citizenship in the United States: The Roles of Immigrant Characteristics and Country of Origin." In *Ethnicity and Labor Market Outcomes (Research in Labor Economics, Volume 29)*, edited by Amelie F. Constant, Konstantinos Tatsiramos, and Klaus F. Zimmerman, 91–130. Bingley: Emerald Group Publishing Limited.
- Cities of Migration. 2014. "Mayors on What Makes Cities More Inclusive." [https://citiesofmigration.ca/ezone\\_stories/mayors-on-what-makes-cities-more-inclusive/](https://citiesofmigration.ca/ezone_stories/mayors-on-what-makes-cities-more-inclusive/) [Accessed: 16 September 2021].

- Constant, Amelie F., Liliya Gataullina, and Klaus F. Zimmermann. 2009. "Naturalization Proclivities, Ethnicity and Integration." Edited by Amelie F. Constant. *International Journal of Manpower* 30 (1/2): 70–82. <https://doi.org/10.1108/01437720910948401>.
- Dahl, Robert A. 1989. *Democracy and Its Critics*. New Haven/London: Yale University Press.
- Destatis. 2021a. *Bevölkerung und Erwerbstätigkeit. Einbürgerungen 2020. Wiesbaden*. Wiesbaden: Destatis.
- . 2021b. "Table 12521–0006." <https://www-genesis.destatis.de/genesis/online> [Accessed 12 August 2021].
- DeVoretz, Don J. 2008. "The Economics of Citizenship: A Common Intellectual Ground for Social Scientists?" *Journal of Ethnic and Migration Studies* 34 (4): 679–93. <https://doi.org/10.1080/13691830801961688>.
- Diehl, Claudia, and Michael Blohm. 2001. "Apathy, Adaptation or Ethnic Mobilisation? On the Attitudes of a Politically Excluded Group." *Journal of Ethnic and Migration Studies* 27 (3): 401–20. <https://doi.org/10.1080/136918301200266149>.
- . 2003. "Rights or Identity? Naturalization Processes among 'Labour Migrants' in Germany." *The International Migration Review* 37 (1): 133–62.
- . 2011. "Naturalization as Boundary Crossing. Evidence from Labour Migrants in Germany." In *Identity and Participation in Culturally Diverse Societies*, edited by Assaad E. Azzi, Xenia Chrysochoou, Bert Klandermans, and Bernd Simon, 315–37. Oxford, UK: Wiley-Blackwell. <https://doi.org/10.1002/9781444328158.ch16>.
- Diehl, Claudia, and Patrick Fick. 2012. "Deutschsein auf Probe. Der Umgang Deutsch-Türkischer junger Erwachsener mit dem Optionsmodell." *Soziale Welt* 63 (4): 339–60.
- Dronkers, Jaap, and Maarten Vink. 2012. "Explaining Access to Citizenship in Europe: How Citizenship Policies Affect Naturalization Rates." *European Union Politics* 13 (3): 390–412. <https://doi.org/10.1177/1465116512440510>.

- Evans, M. D. R. 1988. "Choosing to Be a Citizen : The Time-Path of Citizenship in Australia." *International Migration Review* 22 (2): 243–64.
- Expert Council on Integration and Migration. 2015. *Immigration Countries: Germany in an International Comparison. 2015 Annual Report*. Berlin: SVR.
- Faist, Thomas. 2004. "Dual Citizenship as Overlapping Membership." In *International Migration in the New Millennium. Global Movement and Settlement*, edited by Danièle Joly, 210–31. Hants/Burlington: Ashgate.
- Falcke, Swantje, and Maarten Vink. 2020. "Closing a Backdoor to Dual Citizenship: The German Citizenship Law Reform of 2000 and the Abolishment of the 'Domestic Clause.'" *Frontiers in Sociology* 5: 536940.  
<https://doi.org/10.3389/fsoc.2020.536940>.
- Farahat, Anuscheh, and Kay Hailbronner. 2015. *Report on Citizenship Law: Germany*. Florence: GLOBALCIT.
- Fick, Patrick. 2016. "Warum verzichten zweite und dritte Generation auf den deutschen Pass? Die Bedeutung transnationaler Bindungen im Kontext des deutschen Staatsangehörigkeitsrechts." *Soziale Welt* 67 (4): 407–30.  
<https://doi.org/10.5771/0038-6073-2016-4>.
- Fick, Patrick, Thomas Wöhler, Claudia Diehl, and Thomas Hinz. 2014. *Integration gelungen? Die fünf größten Zuwanderergruppen in Baden-Württemberg im Generationenvergleich. Ergebnisse einer Mehrthemenbefragung im Auftrag des Ministeriums für Integration Baden-Württemberg*. Konstanz.
- Freeman, Gary P., Luis F. B. Plascencia, Susan González Baker, and Manuel Orozco. 2002. "Explaining the Surge in Citizenship Applications in the 1990s. Lawful Permanent Residents in Texas." *Social Science Quarterly* 83 (4): 1013–25.
- Garcia, J. A. 1981. "Political Integration of Mexican Immigrants: Explorations into the Naturalization Process." *The International Migration Review* 15 (4): 608–25. <https://doi.org/10.2307/2545515>.

- GLOBALCIT. 2017. "Global Database on Modes of Acquisition of Citizenship, Version 1.0." San Domenico di Fiesole. <https://globalcit.eu/acquisition-citizenship/>.
- Green, Simon. 2001. "Citizenship Policy in Germany: The Case of Ethnicity over Residence." In *Towards a European Nationality? Citizenship, Migration and Nationality Law in the EU*, edited by Randall Hansen and Patrick Weil, 24–51. Basingstoke: Palgrave Macmillan.
- Hainmueller, Jens, Dominik Hangartner, and Giuseppe Pietrantuono. 2015. "Naturalization Fosters the Long-Term Political Integration of Immigrants." *Proceedings of the National Academy of Sciences* 112 (41): 12651–56. <https://doi.org/10.1073/pnas.1418794112>.
- Hainmueller, Jens, Duncan Lawrence, Justin Gest, Michael Hotard, Rey Koslowski, and David D. Laitin. 2018. "A Randomized Controlled Design Reveals Barriers to Citizenship for Low-Income Immigrants." *Proceedings of the National Academy of Sciences* 115 (5): 939–44. <https://doi.org/10.1073/pnas.1714254115>.
- Hammar, Tomas. 1985. "Dual Citizenship and Political Integration." *International Migration Review* 19 (3): 438–450.
- Helgertz, Jonas, and Pieter Bevelander. 2017. "The Influence of Partner Choice and Country of Origin Characteristics on the Naturalization of Immigrants in Sweden: A Longitudinal Analysis." *International Migration Review* 51 (3): 667–700. <https://doi.org/10.1111/imre.12244>.
- Hochman, Oshrat. 2011. "Determinants of Positive Naturalisation Intentions among Germany's Labour Migrants." *Journal of Ethnic and Migration Studies* 37 (9): 1403–21. <https://doi.org/10.1080/1369183X.2011.623615>.
- Huddleston, Thomas. 2020. "Naturalisation in Context: How Nationality Laws and Procedures Shape Immigrants' Interest and Ability to Acquire Nationality in Six European Countries." *Comparative Migration Studies* 8 (18). <https://doi.org/10.1186/s40878-020-00176-3>.

- Huddleston, Thomas, and Jasper Dag Tjaden. 2012. "Immigrant Citizens Survey. How Immigrants Experience Integration in 15 European Cities." Brussels.
- Jones-Correa, Michael. 2001a. "Under Two Flags: Dual Nationality in Latin America and Its Consequences for Naturalization in the United States." *International Migration Review* 35 (4): 997–1029.  
<https://doi.org/10.1111/j.1747-7379.2001.tb00050.x>.
- . 2001b. "Institutional and Contextual Factors in Immigrant Naturalization and Voting." *Citizenship Studies* 5 (1): 41–56.  
<https://doi.org/10.1080/13621020020025187>.
- Joppke, Christian. 1999. "How Immigration Is Changing Citizenship: A Comparative View." *Ethnic and Racial Studies* 22 (4): 629–52.  
<https://doi.org/10.1080/014198799329323>.
- . 2003. "Citizenship between De- and Re-Ethnicization." *European Journal of Sociology* 44 (3): 429–58. <https://doi.org/10.1017/S0003975603001346>.
- Kochenov, Dimitry, and Justin Lindeboom. 2019. "Quality of Nationality Index, Mendeley Data, V1." Groningen. <https://doi.org/10.17632/53zr7cfyrs.1#file-64e21222-a029-4803-81b0-cab1fba47ceb>.
- Labussière, Marie, and Maarten Vink. 2020. "The Intergenerational Impact of Naturalisation Reforms: The Citizenship Status of Children of Immigrants in the Netherlands, 1995–2016." *Journal of Ethnic and Migration Studies*.  
<https://doi.org/10.1080/1369183X.2020.1724533>.
- Lamont, Michèle, and Virág Molnár. 2002. "The Study of Boundaries in the Social Sciences." *Annual Review of Sociology* 28: 167–95.
- Liang, Zai. 1994. "Social Contact, Social Capital, and the Naturalization Process: Evidence from Six Immigrant Groups." *Social Science Research* 23 (4): 407–37.
- Logan, John R., Sookhee Oh, and Jennifer Darrah. 2012. "The Political and Community Context of Immigrant Naturalization." *Journal of Ethnic and Migration Studies* 38 (4): 535–54.  
<https://doi.org/10.1080/1369183X.2012.659116>.

- Maehler, Débora B., Martin Weinmann, and Katja Hanke. 2019. “Acculturation and Naturalization: Insights from Representative and Longitudinal Migration Studies in Germany.” *Frontiers in Psychology* 10:1160.  
<https://doi.org/10.3389/fpsyg.2019.01160>.
- Mazzolari, Francesca. 2009. “Dual Citizenship Rights: Do They Make More and Richer Citizens?” *Demography* 46 (1): 169–91.
- Mossaad, Nadwa, Jeremy Ferwerda, Duncan Lawrence, Jeremy M. Weinstein, and Jens Hainmueller. 2018. “Determinants of Refugee Naturalization in the United States.” *Proceedings of the National Academy of Sciences* 115 (37): 9175–80.  
<https://doi.org/10.1073/pnas.1802711115>.
- Pedroza, Luicy. 2015. “The Democratic Potential of Enfranchising Resident Migrants.” *International Migration* 53 (3): 22–35.  
<https://doi.org/10.1111/imig.12162>.
- Peters, Floris, Maarten Vink, and Hans Schmeets. 2016. “The Ecology of Immigrant Naturalisation: A Life Course Approach in the Context of Institutional Conditions.” *Journal of Ethnic and Migration Studies* 42 (3): 359–81.  
<https://doi.org/10.1080/1369183X.2015.1103173>.
- Regierungspräsidium Darmstadt. 2019. “RP legt Einbürgerungsbilanz vor.”  
<https://rp-darmstadt.hessen.de/pressemitteilungen/rp-legt-einbuergerbungsbilanz-vor-briten-bleiben-zweitgroesste-gruppe> [Accessed: 29 March 2020].
- Spiro, Peter J. 1999. “Questioning Barriers to Naturalization.” *Georgetown Immigration Law Journal* 13 (479–519).
- Steinhardt, Max Friedrich. 2012. “Does Citizenship Matter? The Economic Impact of Naturalizations in Germany.” *Labour Economics* 19 (6): 813–23.
- The Telegraph. 2017. “Senior German Politicians Call for Changes to Dual Citizenship Laws after German Turks Vote to Increase Erdogan’s Powers . Article by Justin Huggler, April 18, 2017.”  
<http://www.telegraph.co.uk/news/2017/04/18/senior-german-politicians-call-changes-dual-citizenship-laws/> [Accessed: 21 September 2017].

- Venema, Mathias, and Claus Grimm. 2002. *Situation der ausländischen Arbeitnehmer und ihrer Familienangehörigen in der Bundesrepublik Deutschland. Repräsentativuntersuchung 2001. Teil A: Türkische, ehemalige Jugoslawische, italienische, sowie griechische Arbeitnehmer und ihre Familienangehörigen*. Offenbach/München: BMAS.
- Vink, Maarten, Gerard-Rene De Groot, and Ngo Chun Luk. 2015. "MACIMIDE Global Expatriate Dual Citizenship Dataset. Harvard Dataverse, V4 [2019]." Maastricht. <https://doi.org/10.7910/DVN/TTMZ08>.
- Vink, Maarten, Tijana Prokic-Breuer, and Jaap Dronkers. 2013. "Immigrant Naturalization in the Context of Institutional Diversity: Policy Matters, but to Whom?" *International Migration* 51 (5): 1–20. <https://doi.org/10.1111/imig.12106>.
- Vink, Maarten, Anna Tegunimataka, Floris Peters, and Pieter Bevelander. 2021. "Long-Term Heterogeneity in Immigrant Naturalization: The Conditional Relevance of Civic Integration and Dual Citizenship." *European Sociological Review* 37 (5): 751–65. <https://doi.org/10.1093/esr/jcaa068>.
- Weinmann, Martin, Inna Becher, and Christian Babka von Gostomski. 2012. *Einbürgerungsverhalten von Ausländerinnen und Ausländern in Deutschland sowie Erkenntnisse zu Optionspflichtigen. Ergebnisse der BAMF-Einbürgerungsstudie 2011*. Nürnberg: BAMF.
- Wimmer, Andreas. 2008. "Elementary Strategies of Ethnic Boundary Making." *Ethnic and Racial Studies* 31 (6): 1025–55. <https://doi.org/10.1080/01419870801905612>.
- Winter, Elke, Annkathrin Diehl, and Anke Patzelt. 2015. "Ethnic Nation No More? Making Sense of Germany's New Stance on Dual Citizenship by Birth." *Review of European and Russian Affairs* 9 (1): 1–18.
- Witte, Nils. 2014. *Legal and Symbolic Membership – Symbolic Boundaries and Naturalization Intentions of Turkish Residents in Germany*. EUI Working Papers 100. Florenz: EUI.

———. 2018. *Negotiating the Boundaries of Belonging. The Intricacies of Naturalisation in Germany*. Wiesbaden: Springer VS.

Worbs, Susanne. 2014. *Bürger auf Zeit. Die Wahl der Staatsangehörigkeit im Kontext der deutschen Optionsregelung. Beiträge zu Migration und Integration, Band 7*. Nürnberg: BAMF.

Yang, Philip Q. 1994a. "Ethnicity and Naturalization." *Ethnic and Racial Studies* 17 (4): 593–618.

Yang, Philip Q. 1994b. "Explaining Immigrant Naturalization." *International Migration Review* 28 (3): 449–77. <https://doi.org/10.2307/2546816>.

### **Data Availability Statement**

The survey data used in this study have been provided by the Research Centre Migration, Integration and Asylum of the German Federal Office for Migration and Refugees (BAMF) for this research. The data can be requested at BAMF's Research Data Centre, Frankenstrasse 210, D-90461 Nürnberg (<https://www.bamf.de/EN/Themen/Forschung/Forschungsdatenzentrum/forschungsdatenzentrum-node.html;jsessionid=AA27AB612F7499C FB583C47B1F354759.internet282>). Stata code for replication can be requested from the author.

## **4. Advocacy Coalitions, Power and Opportunities: Policy Change in Germany’s Dual Citizenship Policy Subsystem. (Article 3)**

During the dissertation review process, the manuscript underwent a revision and was published in the meantime. It is published as follows:<sup>i</sup>

Weinmann, Martin. 2026: “Advocacy Coalitions, Power and Opportunities: Policy Change in Germany’s Dual Citizenship Policy Subsystem. *German Politics*: 1–26.

This is an original manuscript of an article published by Taylor & Francis in *German Politics* on 18 May 2026.

It is available at: <https://doi.org/10.1080/09644008.2026.2673121>

### **Abstract**

Citizenship policy in Germany has been highly contested, particularly regarding dual citizenship. Nearly 25 years after the failed attempt of the SPD and Bündnis 90/Die Grünen coalition to fully accept dual citizenship, the principle of avoiding multiple citizenship was abolished with the Citizenship Modernization Act of 2024. This paper examines the long-term policy change using the Advocacy Coalition Framework (ACF), which is well-suited for analyzing both policy stability and change over extended periods, especially with regard to contested policy issues. The policy change took place in three central stages: the introduction of *ius soli* with temporary limited dual citizenship (1999), the abolition of this limitation (2014), and the full acceptance of dual citizenship (2024). Key factors explaining policy change and stability between 1999 and 2024 are strongly linked to the federal system. These are the shifts in power at federal and Länder level as well as relatively stable parameters lying outside the policy subsystem and the related and changing coalition opportunity structures due to the federalism reform of 2006. Further aspects are public opinion, a brokered compromise, changing beliefs as well as empirical issues concerning the seriousness and causes of the policy problem.

## 4.1 Introduction

Dual citizenship is increasingly accepted worldwide (e.g. Sejersen 2008; Mirilovic 2015; Vink et al. 2019; van der Baaren 2020). Nevertheless, while scholarly debate on change and continuity in citizenship policy has a long tradition, further studies are still needed to better understand how the mechanisms of policy change operate within this highly contested field (Graeber 2022). Against this background, two questions are of interest: What prompts states to reform their policies (Faist, Gerdes, and Rieple 2004; Howard 2005)? Why have countries “maintained a negative attitude to dual citizenship” even though there has been a broad debate on dual citizenship (Sejersen 2008, 540)? Germany is an appropriate case study since “dual nationality has aroused passions and a degree of party political conflict in Germany which has been witnessed in few other countries” (Green 2005, 923). It is suitable for examining both political stability and political change in relation to dual citizenship: The initial draft of the 1999 German citizenship reform provided for dual citizenship, but the final law did not. In the following decade, various exceptions were introduced, without dual citizenship being generally permitted. As a result, dual citizenship was accepted in 80.9% of all naturalizations in 2023 (Statistisches Bundesamt 2024). In 2024, 25 years after the 1999 reform, dual citizenship was finally fully introduced by the Act on the Modernization of Citizenship Law (Citizenship Modernization Act).

Against this background, the overarching research interest of this paper is how policy change has taken place in the area of dual citizenship in Germany between 1999 and 2024. The paper thus builds upon analyses of earlier reforms of German citizenship policy, such as in the early 1990s or the 1999 citizenship reform (e.g. Murray 1994; Green 2000, 2006; Howard 2008), but at the same time goes beyond these by tracing developments up to the mid-2020s. To examine policy change in the policy field of dual citizenship in Germany, I take recourse on the Advocacy Coalition Framework (ACF) (e.g. Sabatier 1987, 1993, 1998). The ACF is particularly well suited to study “contentious policy issues” (Weible and Jenkins-Smith 2016, 26) and for examining both policy change and policy stability. One of the overarching purposes of the ACF is “to explain belief change and policy change over long periods” (Sabatier and Weible 2007, 208). This makes the ACF a suitable instrument for examining dual citizenship policy in Germany.

The article is structured as follows: First, I develop a research framework, which I then use to examine dual citizenship policy in Germany between 1999 and 2024, before concluding with a summary and a discussion of the findings. I argue that two central aspects of the ACF play a particularly important role which are strongly related to Germany's federal system: shifts in power at federal level and the level of the Länder as well as relatively stable parameters lying outside the policy subsystem and the related and changing coalition opportunity structures due to the federalism reform of 2006.

## **4.2 Research framework**

This study examines policy change in the field of dual citizenship in Germany using the Advocacy Coalition Framework (ACF) (e.g. Sabatier 1987, 1993, 1998). The ACF was primarily used as an analytical framework to analyze policy change in other areas, such as energy, environmental and health policy, its application to migration-related fields remains limited (Weible, Sabatier, and McQueen 2009; Pierce, Peterson, and Hicks 2020). Although a few recent studies have applied the ACF to migration policy change (Ripoll Servent and Trauner 2014; Shin 2019; Wachuku 2019), it has not yet been used to analyze citizenship policy, which is particularly surprising considering that the ACF is especially effective in studying "contentious policy issues" (Weible and Jenkins-Smith 2016, 26). The framework provides a systematic lens for examining how belief systems, advocacy coalitions, and political opportunity structures interact to shape policy change over extended periods of time. Citizenship policy is a highly contested domain, where advocacy coalitions promote competing belief systems on membership, national belonging, and integration. This makes the ACF a suitable instrument for explaining the case of policy change in the field of dual citizenship.

Before introducing the ACF as the analytical framework, I take a brief look at what can be learned from reforms and debates on dual citizenship in different countries. In particular, this overview explores what is contested about dual citizenship reform, which actor constellations and advocacy coalitions typically emerge, and what obstacles as well as facilitating factors shape the prospects for successful reform. These insights provide the empirical foundation for the subsequent analytical application of

the ACF. The section concludes with a short overview of the empirical data and the methodological approach underlying the analysis.

### *Dual citizenship reforms as a contested policy issue*

In many countries, citizenship laws are a major political issue. Political actors often disagree over whether extending citizenship rights to settled migrants or not, with typical actor coalitions consisting of left-wing parties that support granting citizenship rights to already-entered migrants and right-wing parties that oppose such extensions in favor of a more conditional status (Blatter, Erdmann, and Schwanke 2009; Janoski 2010; Natter, Czaika, and de Haas 2020; Graeber 2022). Especially, “the acceptance of dual citizenship is often a very controversial aspect of citizenship reforms” (Blatter, Erdmann, and Schwanke 2009, 32). Contested issues surrounding the acceptance of dual citizenship include concerns about dual obligations – such as compulsory military service, taxation, or jurisdiction in matters of diplomatic protection – as well as debates over its effects on migrant integration. While some argue that granting dual citizenship promotes integration by removing barriers to naturalization, others contend that it may hinder integration by allowing migrants to maintain exclusive attachments to more than one country, potentially generating loyalty conflicts and devaluing citizenship (Naujoks 2009; Blatter, Erdmann, and Schwanke 2009; Faist, Gerdes, and Rieple 2004). These “traditional arguments” (Midtbøen 2019) for or against dual citizenship can be traced, for example, in debates in Denmark, Germany, the Netherlands, Norway, and Sweden, where conservative and right-wing actors have often expressed reservations, whereas left-leaning actors have supported its acceptance (Midtbøen 2019; Gustafson 2002; Faist, Gerdes, and Rieple 2004; Ersbøll 2021). In these countries, dual citizenship reforms have been strongly shaped by parliamentary and decision-making structures and elite-level agreements. Stable majorities or government coalitions often blocked reform (Sweden 1990s, Germany 1990s, Denmark and Norway early 2000s), while shifts in power (Denmark 2011, Germany 2021), wide cross-party consensus (Netherlands 1991, Sweden 2001), and changes in party positions (Liberal Party in Denmark 2011, Conservative and Progress Party in Norway 2017) paved the way for the introduction of dual citizenship (Netherlands 1993, Sweden 2001, Denmark 2015, Norway 2020, Germany 2024). Conversely, the reintroduction of the renunciation requirement for naturalization in the Netherlands (1997) resulted from

changing positions among conservative parties. The extent to which mainstream parties avoided politicizing the issue influenced whether dual citizenship could be adopted without provoking public controversy (Netherlands early 1990s, Sweden, Denmark, Norway), whereas when the issue moved from elite-level discussions to the public arena, it could result in opposition to dual citizenship (Netherlands 1997; Germany 1999). Overall, these cases illustrate that dual citizenship reform depends not only on political and ideological attitudes, but also on the interaction of political majorities, elite consensus, institutional mechanisms, and the degree of public support or mobilization, which can open or close windows of opportunity for change (Faist, Gerdes, and Rieple 2004; van Oers, de Hart, and Groenendijk 2013; Midtbøen 2019; Ersbøll 2021; Weinmann 2024).

#### *Advocacy Coalition Framework*

A central premise of the Advocacy Coalition Framework (ACF) is that the process of policy change can only be understood in a time perspective of a decade or more (Sabatier 1993). The approach assumes that policy change over such a period of time can best be examined if policy subsystems are considered since political decisions are made in these subsystems. A subsystem is “the set of actors who are involved in dealing with a policy problem” (Sabatier 1993, 24). These actors include not only politicians or representatives of the legislative, judicial and executive branches, but also representatives of interest groups, academics and journalists specializing in this policy field (Sabatier and Weible 2007). Subsystems include, on the one hand, actors with clear positions, who generally form two to four coalitions. These groups compete against each other with the goal to change policies based upon their beliefs. There is usually one dominant coalition, which is opposed by one or more “minority coalitions” (Sabatier 1993, 34). Minority coalitions usually try to influence political programs by confronting the majority coalition with weaknesses in current policy. The so-called “devil shift” is important in this context. It is characterized by the fact that both sides perceive the intentions of the other side as particularly hostile (demonization) and at the same time overestimate the influence of the other side (e.g. Sabatier and Weible 2007). On the other hand, subsystems include policy brokers who cannot be clearly assigned to these (opposing) positions and who offer solutions and aim to resolve conflicts between opposing coalition groups (Weible, Sabatier, and McQueen 2009).

Another central assumption of the ACF is that coalitions are bound by a consistent set of beliefs (“belief systems”) and aim to change policies based on these beliefs (e.g. Sabatier 1998). A distinction is made between three levels of belief systems: deep core beliefs, policy core beliefs and secondary aspects. The deep core beliefs are the decisive normative beliefs of the members and are “very difficult to change” (Sabatier and Weible 2007, 194). Policy-related core beliefs are general perceptions and values in relation to the policy field. These policy core beliefs are more changeable than deep core beliefs, but more stable than secondary aspects. The latter are specific beliefs and attitudes, for example in relation to the choice of instruments to realize core beliefs. The approach assumes that in major disputes within a policy subsystem, i.e. when core beliefs are at stake, the alignment of allies and opponents remains relatively constant over a period of about a decade. Moreover, advocacy coalitions emerge on the basis of converging core beliefs and that within these coalitions the core beliefs remain relatively constant (Sabatier 1993).

In early versions of the ACF “policy-oriented learning and external perturbations” (Sabatier and Weible 2007, 192) played a central role for belief and policy change. It was assumed that policy learning only leads to changes in secondary beliefs (e.g. Jenkins-Smith and Sabatier 1993). This as well as relatively stable parameters lying outside the policy subsystem (e.g., basic constitutional norms, sociocultural values) thus explain political stability over time rather than policy change. In terms of policy change, it is assumed that fundamental changes only occur following externally induced shifts in power, e.g., through elections, economic change or changes in public opinion (e.g. Sabatier 1993; Sabatier and Weible 2007). Public opinion is also a policy relevant resource since “(a) supportive public is more likely to elect coalition supporters to legislative and other positions of legal authority and to help sway the decisions of elected officials” (Sabatier and Weible 2007, 203). Public opinion acts both as an external event and as a strategic resource for advocacy coalitions (Sabatier and Weible 2007). On the one hand, changes in public opinion can create opportunities for policy change; on the other hand, public support serves as a strategic resource. Coalitions can mobilize public opinion to legitimize their positions and influence policy change, with greater public support enhancing the likelihood of advocacy success (Rasmussen, Mäder, and Reher 2018). Another important prerequisite for policy change is, for example, that the conflict is dealing with “empirical issues” primarily concerning the

seriousness and causes of the problem to be solved (Sabatier and Weible 2007, 206–7).

Later adaptations of the ACF put a stronger focus on “coalition opportunity structures” which “refer to relatively enduring features of a polity that affect the resources and constraints of subsystem actors” (Sabatier and Weible 2007, 200). These opportunity structures capture the institutional context of a policy subsystem and define the strategic landscape within which advocacy coalitions operate. They shape which actors can effectively promote or block policy change and structure the relative power of competing coalitions. Although these opportunity structures are relatively stable, they may evolve over time, thereby altering coalition resources and the “likelihood of policy change” (Gupta et al. 2025, 131). These include, for example, the degree of consensus or compromise and the number of decision-making bodies that are crucial for major political change. Institutional veto points play a central role in this regard. The number of decision-making venues and the degree of agreement required among potential veto players (Tsebelis 1995) are particularly important for understanding how coalition opportunity structures operate (Gupta et al. 2025; Heinmiller 2023). In relatively open systems with numerous veto players whose consent is necessary for reform, policy change tends to be “slow and difficult” (Gupta et al. 2025, 134; see also Ingold and Varone 2012). Even minority coalitions may trigger a stalemate by blocking proposals advanced by others (Heinmiller 2023, 2025). Thus, a coalition defending the policy status quo can be considered “in power” (Heinmiller 2023, 33) when it controls or effectively influences one or more veto points, enabling it to prevent changes that would undermine its core policy beliefs. This can result in a “hurting stalemate”, an important trigger for negotiated agreements (Sabatier and Weible 2007, 206–7). In systems characterized by multiple institutional veto points, such hurting stalemates are particularly likely, as competing coalitions may be able to block each other’s initiatives over extended periods (Heinmiller 2023; Gupta et al. 2025). Understanding how advocacy coalitions interact with institutional veto points is therefore essential for explaining why policy change is often incremental, contested, and why certain coalitions are able to defend the policy status quo effectively (Heinmiller 2023, 2025). This perspective is especially relevant for interpreting complex reforms in federal parliamentary systems such as Germany, where multiple decision-making venues and veto players structure the dynamics of coalition competition. Political systems requiring broad

agreement for major reforms create strong incentives for coordination and compromise among advocacy coalitions (Sabatier and Weible 2007). Thus, the role of policy brokers becomes particularly salient in institutional contexts characterized by multiple veto points, as they strategically navigate between advocacy coalitions and coordinate compromise solutions (Sabatier and Weible 2007; Ingold and Varone 2012). By mediating between competing coalitions, they may stabilize existing policies or facilitate negotiated change. At the same time, brokerage enables them to advance their own interests, for instance by shaping policy outcomes that lie between the positions of rival coalitions (Ingold and Varone 2012).

### *Empirical strategy*

The overarching research interest of this paper is how policy change has taken place in the area of dual citizenship in Germany between 1999 and 2024. The study therefore focuses on the policy subsystem of citizenship policy. The analysis is based on several documents. These include parliamentary debates on dual citizenship and law proposals between 1999 and 2024, as well as other publicly accessible documents like press interviews and statements by advocacy coalition representatives, in particular the parliamentary party leaders in the *Bundestag* and the Federal Ministers of the Interior, as they are considered to play a central role in migration and citizenship policy (Murray 1994; Green 2006). The more than 30 transcripts of the relevant debates and the law proposals were collected from the Documentation and Information System for Parliamentary Materials (DIP) of the German *Bundestag*. All other publicly accessible sources were collected as part of a systematic internet search (for an overview of all documents analyzed see Appendix II, Appendix of Article 3). Building on previous analyses of German citizenship reforms in the 1990s (Murray 1994; Green 2000, 2005, 2006; Howard 2008; Gerdes and Faist 2006), I first identify the main advocacy coalitions and their belief systems. This provides the basis for an ACF-based analysis of the reforms from 1999 onwards, conducted through a systematic reading of the collected documents, focusing on political stability and change.

### 4.3 Dual citizenship policy in Germany between 1999 and 2024

#### *Citizenship policy before the 1999 reform*

Germany's citizenship policy was long seen as outdated and restrictive, failing to address large-scale immigration and the associated demographic trends (Brubaker 1992). As far as the acceptance of dual citizenship is concerned, Germany had been "known as an international laggard" for decades (Hofhansel 2023, 200). Intense political debates over German citizenship policy began in the 1980s and gained momentum in the 1990s (Murray 1994). The policy field was largely shaped by the political parties, with the discourse being political and legal-academic in nature and rather elitist (Murray 1994; Green 2005; Howard 2008). The *Reichs- und Staatsangehörigkeitsgesetz* from 1913 was still the applicable legal norm in the Federal Republic of Germany. Even though foreigners could apply for naturalization on a discretionary basis, a legal right to naturalization was not embodied in citizenship law until shortly after German reunification. Liberalizations in the 1990s aimed to integrate long-term foreign residents and their descendants. However, prior to the Citizenship Act of July 15, 1999, German citizenship was granted primarily according to the principle of descent (*ius sanguinis*) and foreign nationals had to fulfil a minimum residence period of 15 years for entitlement-based naturalization and give up their previous citizenship in order to be naturalized.

The field of citizenship policy in Germany in the 1990s was highly contested, with the lines of conflict running along different understandings of the role of citizenship acquisition in the process of immigrant integration (Green 2005; Gerdes and Faist 2006). The political parties, especially the parliamentary groups in the *Bundestag* and their leaders as well as the Federal Ministers of the Interior, played a central role at the time in migration and citizenship policies (Murray 1994; Green 2006). The federal states also had significant influence, as many laws required approval by the *Bundesrat*, the second federal legislative chamber. Moreover, the federal states are responsible for implementing citizenship law. Trade unions, churches, and welfare organizations, as well as migrant self-organizations, by contrast, played only a very subordinate role (Green 2006).

Essentially, two central advocacy coalitions can be identified: The dominant coalition consisted of the CDU and CSU (Union parties), which formed a joint parliamentary group, participated in the government, and provided the Federal Chancellor. The belief

system that bound this coalition together was primarily based on the deep core belief that acquiring citizenship represented the completion of the integration process. Accordingly, dual citizenship was seen as an obstacle to integration fostering loyalty conflicts and preventing immigrants from fully engaging with the host country (e.g. Murray 1994; Green 2000; Gerdes and Faist 2006; Howard 2008). In contrast, there was a minority coalition, which was essentially made up of the Social Democratic Party (SPD) and Bündnis 90/Die Grünen (Greens), then opposition. The belief system that bound this coalition together was essentially based on the deep core belief that the acquisition of citizenship was a catalyst for integration. Accordingly, dual citizenship can be accepted, as it leads to a quick legal integration of long-term foreign residents (e.g. Green 2005, 2006; Gerdes and Faist 2006). The liberal FDP,<sup>ii</sup> which was also part of the government at the time, cannot be assigned to any of these coalitions. The FDP took a middle position, viewing citizenship as complementary to integration and dual citizenship as a temporary exception – an offer of integration followed by a conscious choice of German citizenship (e.g. Murray 1994; Howard 2008).

This constellation marked the starting point for the 1999 reform and the subsequent policy change on dual citizenship.

#### *Stability and Change: The Citizenship reform in 1999*

The 1998 federal elections brought a shift in power that marked a turning point in German citizenship policy. The new governing parties, SPD and the Greens, aimed to reform the law by introducing territorial principle (*ius soli*) and accepting multiple nationality. While Interior Minister Otto Schily's 1999 first draft bill included both, general acceptance of dual citizenship was dropped in the final version.

The failure of this part of the 1999 reform was due to a political campaign and a shift in *Bundesrat* power. Roland Koch, CDU candidate in the Hesse state election, launched a petition against the red-green reform plans. The campaign “represented an innovative political tactic” (Cooper 2002, 89) and led to an intensive political and social debate. The line of conflict between the two central advocacy coalitions ran along their opposing core beliefs about the role of (dual) citizenship in integration. The following quotes from key representatives of both sides illustrate this:

Kerstin Müller, Chairwoman of the Bündnis 90/Die Grünen parliamentary group in the *Bundestag*: “[...] dual citizenship is and was always intended only as an instrument to achieve fast and unbureaucratic naturalization”. (Appendix II: Table A3.2: *Plenary protocol 14/28, 2289; author’s translation*)

Wolfgang Schäuble (CDU) chairman of the CDU/CSU parliamentary group in the *Bundestag* and CDU party chairman: “Of course, in many naturalizations – even in the past – there is a situation where dual citizenship is accepted in justified individual cases. That is not a bad thing, it is quite normal. But if the exception becomes the rule, then the decision to acquire German citizenship no longer means a decision for integration in Germany. Thus, dual citizenship as a rule does not promote integration, but hinders it, and that is why we have said that we will fight this with the possibilities we have: in parliament as well as in the mobilization of public opinion pressure against this wrong project of the federal government”. (Appendix II: Annex A3.1: *Deutschlandfunk 1999c; author’s translation*)

Within a few weeks, over four million people signed the petition against the federal government’s reform plans entitled “Yes to integration – No to dual citizenship” (Appendix II: *Spiegel Archiv 2016; author’s translation*). The campaign was criticized by the Christian churches, welfare associations, trade unions and migrant associations and interest groups, such as the Turkish Community of Germany (*Türkische Gemeinde Deutschland*) or the Federal Advisory Council for Foreigners (*Bundesausländerbeirat*), which spoke out in favor of dual citizenship (Bade and Münz 2000) and can therefore be assigned to the advocacy coalition of the then governing parties. However, the reform plans were literally demonized in the political debate by the other side – described as “devil shift” in the ACF – as a quote from the Bavarian Minister President Edmund Stoiber (CSU) from January 1999 makes particularly vivid: “The planned dual citizenship will endanger the security situation in Germany more than the terrorist actions of the Red Army Faction (RAF) in the seventies and eighties” (Appendix II: Annex A3.1: *Spiegel Archiv 1999; author’s translation*). The governing parties were not prepared for this and had “badly misjudged public opinion” (Green 2005, 938). This was not least because the proposed liberalization of citizenship law had been an

“elite-driven process” which was now countered by the “mobilisation of xenophobia [...] [leading] to a rather sudden restrictive backlash” (Howard 2008, 41). Public opinion surveys showed a significant increase in opposition to dual citizenship: while less than half of the population rejected dual citizenship in the early 1990s, this figure rose to two-thirds by the end of the 1990s (Abalı 2009). As a result of the campaign, the SPD and the Greens lost the state election in Hesse (Schmitt-Beck 2000). The defeat cost the SPD-led states their absolute majority in the *Bundesrat*, whose approval was required for the reform of the Citizenship Act. Given the symbolic nature of migration and citizenship policy, party politics strongly shaped *Bundesrat* dynamics (Green 2005): Despite holding only ten votes, the Union parties were able to block the introduction of dual citizenship, as the SPD-led states held only 33 votes – two short of the 35 required for an absolute majority in the *Bundesrat*. The remaining votes were held by states where either both the SPD and CDU, or one of the two parties together with the FDP, formed the government (Bundesrat 2024a). The Union parties formally constituted the minority coalition defending the policy status quo but, by virtue of their control over a veto point, were able to create a hurting stalemate – an important trigger for negotiated agreements in the ACF (Sabatier and Weible 2007) – and were thus effectively “in power” (Heinmiller 2023, 33). This prompted the *Bundesrat* to call on the Mediation Committee (*Vermittlungsausschuss*), a joint body of *Bundestag* and *Bundesrat* tasked with resolving legislative disputes. Securing a majority now required cooperation with the liberal FDP, made possible by its coalition with the SPD in Rhineland-Palatinate (Green 2000). However, the FDP, opposed to general dual citizenship, brokered a compromise that was in line with their own beliefs. In the parliamentary debate, FDP Secretary General Guido Westerwelle phrased the FDP’s position as follows:

“We, as the F.D.P., advocate that the integration offer should also be followed by an integration decision. That is why we have clearly and consistently opposed the coalition’s original plans to introduce permanent dual citizenship for all. Anyone who wants to become a German citizen should in principle commit to our country by renouncing their previous citizenship. The German passport is not just some paper that you are happy to receive in addition, but requires a conscious commitment to the German state. [...] But in the case of children born

here, we accept multiple nationality for a certain period of time because, as minors, they cannot decide for themselves. [...] We clearly and unambiguously adhere to the principle of avoiding multiple nationality.” (Appendix II: Table A3.2: *Plenary protocol 14/28, 2294, author’s translation*)

The compromise was based on a model already discussed in the 1990s (see e.g. Green 2006; Howard 2008), which allowed dual citizenship only temporarily until age 23 for those acquiring German nationality through the place of birth principle. The final law (Appendix II: Table A3.1: *BT-Drs. 14/533*), passed by *Bundestag* and *Bundesrat*, thus marked a clear departure from the original draft, which had envisioned full acceptance of dual nationality. Nevertheless, the reform represented a paradigm shift compared to previous policy (Green 2000; Joppke 2003; Gerdes and Faist 2006). It can be categorized between stability and change: With the new conditional *ius soli*, children born in Germany to foreign parents were granted dual citizenship at birth – but only temporarily. They had to choose between German and parental citizenship by age 23 (known as *Optionspflicht*, the “obligation to choose”; hereinafter also referred to as option scheme). A transitional rule extended this to those born between 1990 and 1999. While general acceptance of dual citizenship was rejected, the 2000 Citizenship Act allowed naturalized EU and Swiss citizens to retain their original nationality, provided reciprocity applied (i.e. when Germans acquired the respective country’s citizenship). In addition, a regulation was introduced that restricts the automatic acquisition of German citizenship by the descendants of German emigrants – and thus dual citizenship among this group of people. However, it did not play a role in the debate.<sup>iii</sup>

The governing parties viewed the reform as only a first step toward full acceptance of multiple nationality (Appendix II: Table A3.2: *Plenary protocol 14/28, 2289*). Liberal legal scholars similarly saw it as the “beginning of the necessary complete overhaul” (Renner 1999, 162; author’s translation). In contrast, the CDU/CSU called for a quick reversal of the new rules (Appendix II: Table A3.2: *Plenary protocol 738, 182*). The FDP, however, opposed both rollback and expansion, explicitly reaffirming its commitment to the compromise that had been reached (Appendix II: Table A3.2: *Plenary protocol 14/40, 3438*).

In May 2003, the CDU/CSU opposition tried to tighten the territorial principle during the legislative process for the Immigration Act (*Zuwanderungsgesetz*) by proposing a double *ius soli*: automatic citizenship would require that at least one foreign parent had been born in Germany, thus delaying dual citizenship by a generation. This, they argued, would enable a more reliable assessment of integration (Appendix II: Annex A3.1: *Deutscher Bundestag 2003*). The proposal ultimately failed.

#### *Adjustments and Change: Problem solving from 2007 to 2014*

Following the federal elections in September 2005, a grand coalition of CDU/CSU and SPD under Chancellor Angela Merkel (CDU) governed until October 2009. During this period, only minor, pragmatic adjustments were made to dual citizenship. However, the 2007 Act on the Transposition of Residence and Asylum Directives of the European Union, expanded the acceptance of multiple nationality for EU citizens and Swiss nationals, alongside other changes to naturalization rules (Appendix II: Table A3.1: *BT-Drs. 16/5065*). The previous principle of reciprocity was replaced by a general acceptance of multiple nationality for naturalized individuals from these countries. These changes reflected problem solving, as the reciprocity requirement for EU citizens had led to “legal and practical problems” (Appendix II: Table A3.1: *BT-Drs. 16/5065, 229; author's translation*) since it relied on interpretations of foreign nationality law. Unlike the newly introduced language requirement for naturalization, the general acceptance of multiple nationality for EU citizens and Swiss nationals was not part of the debate.

Under Merkel’s grand coalition, the debate over the option scheme and dual nationality for *ius soli* children intensified from 2008. The trigger was the first cohorts born between 1990 and 2000 reaching adulthood; they had retroactively acquired dual citizenship due to a transitional rule. They now had to choose one nationality, requiring authorities to initiate option procedures often involving repeated contact and documentation. From 2018, around 40,000 such cases were expected annually.

The issue also sparked conflict within the grand coalition. The SPD called for abolishing the option scheme and accepting dual nationality for *ius soli* Germans, while the CDU/CSU opposed this and even proposed returning to pre-1999 law, as a quote of the deputy chairman of the parliamentary group in the *Bundestag*, Wolfgang Bosbach

(CDU), shows: “We want to return to the old nationality law from before 1999, because there can be no dual loyalties” (Appendix II: Annex A3.1: *Der Tagesspiegel 2008; author’s translation*). Parliamentary inquiries, motions, and hearings followed. The opposition party Bündnis 90/Die Grünen unsuccessfully introduced two draft bills in 2006 and 2009 to abolish the option scheme and generally allow dual citizenship. In 2008, the SPD-led states of Berlin and Bremen submitted a joint motion to the *Bundesrat* to abolish the option scheme, which failed to gain a majority and was not forwarded to the *Bundestag* (for an overview see Appendix II: Table A3.1).

Meanwhile, the debate increasingly involved welfare organizations, civil society, experts, and administrators. Debate during this period centered on the administrative challenges of temporary dual citizenship under the option scheme, along with related constitutional and integration policy concerns. Civil society actors increasingly called for ending the option scheme, exemplified by the 2009 initiative “*Wider den Optionszwang!*” (“Against the compulsion to choose!”; author’s translation) which gathered online signatures (Worbs 2014, 55–56) or the welfare organizations which described the option scheme as an “obstacle to integration” (Appendix II: Annex A3.1: *BAGFW 2012; author’s translation*). These actors included civil rights groups like *Pro Asyl*, the Intercultural Council (*Interkultureller Rat*), the German Lawyers Association (*Deutscher Anwaltverein*), the Association of German Cities (*Deutscher Städtetag*), the churches, and welfare organizations. They can be clearly assigned to the advocacy coalition around the red-green parties, which strived for greater acceptance of multiple citizenship.

After the grand coalition ended in 2009, the SPD and Greens renewed efforts to abolish the option scheme and generally allow dual citizenship with draft bills in 2010, but these failed under the CDU/CSU-FDP government. Similar *Bundesrat* motions by SPD, Greens, and Left Party-led states also failed (for an overview see Appendix II: Table A3.1). Interior Minister Thomas de Maizière (CDU) rejected legislative changes as premature, while his successor Hans-Peter Friedrich (CSU) opposed dual citizenship, calling it a barrier to integration, contrasting with more open CDU voices like Armin Laschet (Appendix II: Annex A3.1: *Deutscher Bundestag 2010; Merkur 2013*).

In the 2013 federal election campaign, dual citizenship was again controversial. SPD, Greens, and Left Party sought to abolish the option scheme and accept multiple citizenship, while CDU/CSU wanted to maintain the status quo. The FDP, unlike before, supported dual citizenship (Appendix II: Annex A3.1: *FDP 2013*, 49), but lost *Bundestag* representation. CDU/CSU and SPD once again formed a grand coalition under Chancellor Angela Merkel. During the coalition talks, the Expert Council on Integration and Migration (SVR), an independent body providing research-based policy advice on integration and migration, proposed a model of dual citizenship with generational limitation: the option scheme would be abolished, but unlimited inheritance of citizenship through descent would be limited. Nationality should instead depend on a person's main place of residence (Appendix II: Annex A3.1: *SVR 2013*). Though the model was not adopted, it influenced later political debate. Public opinion was divided at the time of the debate: according to a nationwide population survey conducted in 2013, a narrow majority was in favor of dual citizenship, but slightly more than 40% were against it (FORSA 2013).<sup>iv</sup>

In the coalition agreement the parties agreed that dual citizenship should be possible in the future for “children of foreign parents born and raised in Germany” (Appendix II: Annex A3.1: *CDU, CSU, and SPD 2013*, 74; *author's translation*) by removing the obligation to choose one citizenship. Apart from that, the current nationality law would remain untouched. A quote from the then Federal Minister of the Interior, Thomas de Maizière (CDU), in a press interview illustrates the concessions that the compromise represented for both parties:

“One must first realize what a significant step this agreement represents for both sides of the coalition. For the Union, citizenship holds enormous importance. The fundamental belief that a person can only have loyalty to one state has been something like a genetic code within the CDU and CSU for decades. [...] And anyone who opts for two citizenships can never integrate here in the same way as someone who is clearly committed to this country. For the SPD, the opposite has been and remains a deep conviction. Integration, so the argument goes, will only succeed if we allow both citizenships to coexist. [...] Both are coherent positions that are well-founded. Now, there is a compromise in the coalition agreement, with both sides having made concessions.” (Appendix II: Annex A3.1: *Der Tagesspiegel 2014*; *author's translation*)

After the coalition agreement, a dispute arose over how to define “raised in Germany”. The opposition Greens and Left Party pushed for a full and immediate abolition of the option scheme but failed due to the grand coalition majority. SPD-led states also introduced an unsuccessful *Bundesrat* motion (for an overview see Appendix II: Table A3.1). After intensive debates, CDU/CSU and SPD agreed on a bill in March 2014: *ius soli* children would no longer need to choose a nationality if they had lived in Germany for eight years until the age of 21, attended school in Germany for six years, or held school or vocational qualification obtained in Germany. Citizens of EU member states and Switzerland were generally no longer required to choose between nationalities. The law passed in July 2014 (Appendix II: Table A3.1: *BT-Drs. 18/1312*).

A key reason for the broad compromise was the difficulty of implementing the option scheme in an effective and legally secure way. Conservative authors had suggested that the red-green government had already in 1999 expected enforcement to fail and aimed to abolish the scheme later (Luft 2008, 45). The compromise may thus have been driven by “empirical issues” – about the seriousness and causes of the problem – which the ACF identifies as a key condition for negotiated agreements (Sabatier and Weible 2007, 206–7).

The compromise involved significant concessions for both sides, the Union and the SPD. The SPD made no secret of its goal for broader acceptance of multiple citizenship and saw the compromise as just a step towards that aim (Appendix II: Table A3.2: *Plenary protocol 18/39, 3355*). However, for the Union, the concession was more significant, as it marked a clear departure from its core belief that dual citizenship hinders integration. By largely abolishing the option scheme, it enabled permanent multiple nationality for most *ius soli* Germans – a policy the CDU/CSU had strongly opposed in 1999. SVR Chair Christine Langenfeld called it a “spider-fly compromise” (Langenfeld 2014, 2), where one side’s interests ultimately prevail at the expense of the other.

The CDU/CSU justified this concession by arguing that dual citizenship for children born and raised in Germany did not contradict its core belief that citizenship marks the end of integration, as this group was seen as already integrated. As Günter Krings (CDU), Parliamentary State Secretary to the Federal Minister of the Interior, put it:

“Those who are born and raised here develop a formative bond with this country. [...] However, we allow them to have multiple citizenship as part of their personal biography. We want to spare them the decision between their nationalities – not to promote their integration, but because we assume they are already well integrated here.” (Appendix II: Table A3.2: *Plenary protocol 18/39, 3337; author’s translation*)

*Stability: Ongoing debates without change between 2014 and 2019*

Even after largely abolishing the option scheme, the dual citizenship debate continued. Following a July 2016 demonstration in Cologne supporting Turkish President Erdoğan after the failed coup in Turkey, calls to reinstate the option scheme resurfaced – opposed by SPD and the opposition but supported by some CDU/CSU members (Appendix II: Annex A3.1: *Süddeutsche Zeitung 2016; author’s translation*). Interior Minister Thomas de Maizière (CDU) rejected reversing the 2014 reform, favoring dual citizenship only for a transitional generation: “I prefer loyalty and a clear commitment to one state, not two. [...] For a transitional generation, dual citizenship can actually strengthen loyalty to the new state. However, in my opinion, it should not become the norm for generations to come” (Appendix II: Annex A3.1: *Der Tagesspiegel 2016; author’s translation*). The CDU remained divided, and at the federal party conference in December 2016, a narrow majority backed a motion to end dual citizenship for children of immigrants born in Germany. Chancellor Merkel opposed this, ensuring no changes to citizenship law during the legislative period (Appendix II: Annex A3.1: *Deutsche Welle 2016*). With regard to public opinion, survey results show that in 2016, the population was almost evenly divided between supporters and opponents of dual citizenship (Gülzau 2025).

Throughout the legislative period, the Greens pushed for unconditional *ius soli* and a general recognition of multiple nationality, submitting draft laws in 2015 and 2017 that expired with the term’s end (for an overview, see Appendix II: Table A3.1). In the run-up to the 2017 parliamentary election in Germany, the Union parties and the far-right Alternative for Germany (AfD) opposed dual nationality, while the Social Democrats, the Greens, and the Left Party supported dual nationality (Natter, Czaika, and de Haas 2020). The liberal FDP, unlike in their 2013 election program, advocated for

a model of dual citizenship with generational limitation (Appendix II: Annex A3.1: *FDP 2017*). In the following legislative term (2017-2021), under another grand coalition, the Greens introduced similar proposals to those of the previous term, but they were rejected once again (for an overview, see Appendix II: Table A3.1). Regulations limiting multiple citizenship for Germans born abroad did not play a significant role in the discussion (Weinmann 2017). The debate quieted until gaining momentum again during the 2021 federal election campaign.

#### *Change: The Citizenship Modernization Act of 2024*

In its 2021 federal election manifesto, the SPD called for a “modern citizenship law” that would allow general dual citizenship (Appendix II: Annex A3.1: *SPD-Parteivorstand 2021, 46; author’s translation*). The Greens also supported dual citizenship (Appendix II: Annex A3.1: *Bündnis 90/Die Grünen 2021*). The FDP advocated for a “liberal citizenship law” allowing dual citizenship upon naturalization, but with a generational limitation requiring descendants in the third generation to choose one citizenship (Appendix II: Annex A3.1: *FDP 2021, 58; author’s translation*) – a model first proposed by the Expert Council in 2013.

Following the 2021 election, the SPD, Greens, and FDP formed a coalition and pledged to simplify access to German citizenship by reducing residency requirements and allowing multiple citizenship. However, they also agreed to examine how to prevent the intergenerational transmission of foreign citizenship (Appendix II: Annex A3.1: *SPD, Bündnis 90/Die Grünen, and FDP 2021, 94; author’s translation*). This generational limitation was not included in the initial 2023 draft bill. This led to criticism from the FDP, whose parliamentary group leader Christian Dürr emphasized in January 2023 that there was a “need for improvement” and that the generational limitation was essential: “It is understandable if someone who immigrates to Germany is also allowed to retain the citizenship of their country of origin. But true integration means that later generations only have one citizenship” (Appendix II: Annex A3.1: *Der Tagesspiegel 2023*). The Interior Ministry, which was responsible for the draft law, downplayed the dispute, citing ongoing interdepartmental coordination (Appendix II: Annex A3.1: *Tagesschau 2023*). However, the generational limitation was also not included in the final draft bill (Appendix II: Table A3.1: *BT-Drs. 20/9044*) and the

FDP abandoned its demand (Thym 2024). One reason was that such a model would have been nearly impossible to implement legally, as it would require bilateral agreements with countries of origin on transitional rules (Weinmann 2017; Thym 2024). The FDP, as a former policy broker, now abandoned its core belief that dual citizenship should entail an individual's active choice to integrate by opting for one nationality. This shift cleared the way for policy change, though it was not entirely unexpected: the party had already endorsed multiple nationality in principle in its 2013 manifesto.

The governing parties' plans sparked heated parliamentary debate and were firmly rejected by parts of the opposition. In the debate, the government framed the reform as a modernization of citizenship law. The Minister of State at the Chancellery and Federal Commissioner for Migration, Refugees, and Integration, Reem Alabali-Radovan (SPD), for example, stressed that the reform would complete what had been started 25 years ago (Appendix II: Table A3.2: *Plenary protocol 20/148, 18922*). Representatives of the governing coalition reiterated their core belief about the connection between dual citizenship and integration, for example through Lamya Kaddor, the domestic policy spokesperson for the parliamentary group Bündnis 90/Die Grünen, who stated: "Multiple citizenship is a driver, a motor for integration" (Appendix II: Table A3.2: *Plenary protocol 20/141, 17821; author's translation*). Her colleague Gülistan Yüksel, from the SPD, explained: "You cannot achieve loyalty by forcing people to give up a part of their identity" (Appendix II: Table A3.2: *Plenary protocol 20/141, 17823; author's translation*). The Left Party welcomed the general possibility of dual citizenship, but criticized other aspects of the reform (Appendix II: Table A3.2: *Plenary protocol 20/141, 17816*). In contrast, the opposition center-right CDU/CSU, stated that the amendment would diminish the value of German citizenship and once again demonized the red-green reform plans as a "citizenship devaluation law" (Appendix II: Table A3.2: *Plenary protocol 20/141, 17809; author's translation*). Union representatives restated their core belief, as Member of Parliament Philipp Amthor (CDU) put it: "I tell you – this is a fundamental belief that distinguishes us – for us, citizenship is not at the beginning, but at the end of the integration process" (Appendix II: Table A3.2: *Plenary protocol 20/141, 17820; author's translation*). The parliamentary group's domestic policy spokesman, Alexander Throm (CDU), described the acceptance of multiple citizenship as "fundamentally wrong" since it would not require naturalized citizens to make a clear commitment to Germany and would increase the

political influence of foreign states in Germany (Appendix II: Table A3.2: *Plenary protocol 20/141, 17810; author's translation*). Even harsher criticism came from the far-right anti-immigration Alternative für Deutschland (AfD) party, which referred to the reform as a “sell-out” (*Verramschung*) of German citizenship (Appendix II: Table A3.2: *Plenary protocol 20/141, 17813; author's translation*).

Unlike in the parliamentary debate, the reform plans played only a minor role in the public debate compared to 1999, and public opinion was not mobilized as it had been in the campaign at that time. Surveys conducted in 2023 also revealed a different picture of public opinion than at the end of the 1990s: while just over 40% were in favor of introducing dual citizenship, only slightly more than a third of the population opposed such a reform (Siegel et al. 2023).<sup>v</sup> Younger respondents in particular were more open to reform (Gülzau 2025).

On January 19, 2024, the *Bundestag* passed the Citizenship Modernization Act. The vote revealed ongoing political division: 382 MPs voted in favor, 234 against, and 23 abstained. The reform introduced general acceptance of dual nationality for immigrants and their descendants. In addition, the required residence period was reduced from eight to five years for both conditional *ius soli* and naturalization. Germans also no longer automatically lose their citizenship when acquiring another. However, as in the past, dual citizenship for German emigrants and their descendants was not an issue in the debate. With the 2024 reform, the SPD and Greens achieved their long-standing goal of enshrining multiple citizenship, first pursued in the 1999 reform.

Unlike the earlier reform, the 2024 reform did not require *Bundesrat* approval due to the 2006 federalism reform (Weinmann 2024; Thym 2024). This reform had changed the criteria for approval of federal laws by the *Bundesrat*. Its previous extensive power to participate in federal legislation, which effectively gave it the status of a second legislative chamber with almost equal rights to the *Bundestag*, was restricted with the result that fewer laws require approval (Hermes 2018). By altering the required level of consensus and the number of decision-making bodies, it changed “relatively enduring features” of the polity – described in the ACF as crucial for major political change – by modifying the degree of consensus or compromise and the number of decision-making bodies (Sabatier and Weible 2007, 200). This resulted in altered coalition opportunity structures, described in the ACF as affecting the resources and constraints of

subsystem actors and thereby policymaking (Sabatier and Weible 2007, 199). Given the approval rules that existed prior to the federalism reform, it would have been unlikely for the federal government to secure a majority in the *Bundesrat* for the law: 37 of the 69 *Bundesrat* votes came from states where the CDU/CSU was part of the government (Bundesrat 2024b). The federalism reform had thus fundamentally altered the coalition opportunity structures and changed the likelihood of policy change, as citizenship law was no longer subject to mandatory approval by the *Bundesrat* and, in this policy field, the number of veto points had therefore been reduced. Unlike in 1999, the Union parties, as a minority coalition, were no longer able to block policy change. Thus, a change in relatively stable parameters outside the dual citizenship policy subsystem – set in motion nearly two decades earlier – enabled the SPD and the Greens, following the 2021 shift in power, to complete the paradigm shift in German nationality law they had begun 25 years before.

#### **4.4 Summary and discussion**

Citizenship policy in Germany – particularly the issue of dual citizenship – is a highly contested field. The underlying lines of conflict reflect diverging beliefs about the role of citizenship acquisition in immigrant integration. Nearly 25 years after the red-green government under Chancellor Gerhard Schröder (SPD) failed to fully implement dual citizenship, the principle of avoiding multiple citizenship was finally abolished with the Citizenship Modernization Act on January 19, 2024. While the SPD and the Greens consistently pursued the goal of enabling dual citizenship during this period, the CDU and CSU maintained their negative stance. This raises two key questions: Why did it take so long for Germany to adopt dual citizenship despite a broader international trend in its favor? And how did this policy change ultimately come about, even though the lines of conflict largely remained unchanged? Against this backdrop, this paper examines how this policy change unfolded over two and a half decades. To study the case of policy change in the field of dual citizenship in Germany, I applied the Advocacy Coalition Framework (ACF), which is particularly well-suited for this case. The ACF (1) offers a framework for analyzing both policy change and stability, (2) is designed for studying policy change over a decade or more, and (3) is applicable to contested policy issues (Sabatier 1993; Weible and Jenkins-Smith 2016).

The two dominant advocacy coalitions remained stable throughout the period under review. Their core actors are primarily the political parties and their representatives, who have traditionally played a central role in shaping migration and citizenship policy in Germany. These advocacy coalitions largely align with the parties that have held government power at various times: the CDU/CSU on one side, and the SPD and Bündnis 90/Die Grünen on the other. While other actors – such as those from civil society – can also be assigned to the red-green advocacy coalition, their influence has been secondary.

In summary, two core aspects of the Advocacy Coalition Framework (ACF) are particularly relevant to understand the change of Germany's dual citizenship policy – both closely tied to the federal system. First, competing advocacy coalitions make strategic use of externally induced shifts in power to advance policies aligned with their belief systems. This includes changes in power following federal elections, which the SPD and the Greens leveraged in 1999 and again in 2021 to pursue their reform agendas. Equally important are shifts in power at the state level resulting from elections in the *Länder*, which alter the balance of majorities in the *Bundesrat*. In 1999, the CDU/CSU successfully used its influence in the *Bundesrat* to block and reshape the red-green government's reform plans in line with its own beliefs. Second, relatively stable parameters outside the policy subsystem – along with the evolving coalition opportunity structures they create – play a crucial role in shaping how advocacy coalitions attempt to implement their policy goals on dual citizenship. This refers to the basic constitutional norms embedded in the federal system of the Federal Republic, which in 1999 allowed the Union parties to act as a veto player – despite holding relatively few votes in the *Bundesrat* – thanks to the requirement for *Bundesrat* approval. These stable institutional parameters help explain the political continuity in maintaining the principle of avoiding dual citizenship at that time. However, the coalition opportunity structures changed following the federalism reform. The revised criteria for *Bundesrat* approval of federal legislation meant that a similar blocking scenario was no longer possible in 2024 allowing the red-green parties to implement their reforms without obstruction.

Other elements identified as relevant in the ACF also help explain the gradual shift in Germany's dual citizenship policy over the course of two and a half decades. With regard to the stability of dual citizenship policy, which is characterized by the principle

of avoiding multiple citizenship in the context of the 1999 reform, these include, above all, the demonization of the reform plans (the so-called “devil shift”) and the associated public sentiment and opinion. Public opinion, as a policy-relevant resource, played a crucial role in 1999, when opponents of dual citizenship reform successfully mobilized popular support. This ultimately contributed to a shift in power in the state of Hesse, altering the majority in the *Bundesrat*. The resulting hurting stalemate was ultimately the decisive factor why the FDP was able to act as a policy broker and mediate a political compromise. This compromise introduced *ius soli* and temporary dual citizenship, thus allowing for limited policy change while preserving the underlying principle of avoiding dual nationality. In the subsequent reform process and debates, public opinion played only a secondary role and was not mobilized to any significant extent; moreover, while the population has remained divided in its attitudes toward dual citizenship, opposition has become considerably less pronounced than it was in the late 1990s.

An examination of the belief systems held by the competing advocacy coalitions reveals that they remained largely stable over time. However, the 2024 policy change would likely not have occurred had the FDP, as a former policy broker, continued to uphold its core belief that dual citizenship represents an offer of integration by the state, which should be met with an active decision by the individual. A similar departure from long-standing beliefs occurred in 2014, when the Union parties supported abolishing the option model, despite their earlier insistence that dual citizenship hinders integration. This marked a significant shift toward *ius soli* with unrestricted dual citizenship – an outcome the Union had strongly opposed in 1999. That said, the key driver behind the 2014 change lay less in shifting beliefs than in mounting empirical concerns. From 2008 onwards, the public debate increasingly centered on the administrative and legal difficulties of enforcing the option scheme, which had become evident and ultimately made its continuation untenable.

Due to the interplay of various factors, the policy change pursued by the advocacy coalition around the red-green parties could not be fully implemented as originally envisioned in 1999. Instead, it unfolded in three key stages: first, the introduction of *ius soli* in 1999 with temporary and limited dual citizenship; second, the removal of this limitation in 2014; and third, the general abolition of restrictions on multiple citizenship in 2024.

By examining the “determinants of citizenship policy” in Germany, this qualitative case study helps us to better understand what leads “to inclusionary and exclusionary citizenship policy outcomes” (Goodman 2023, 136). Furthermore, it contributes to a more precise understanding of how the mechanisms of policy change operate in this contested field of citizenship policy (Graeber 2022). The case of Germany illustrates how an important barrier for citizenship acquisition is reduced over two and a half decades in a country with traditionally restrictive dual citizenship rules. However, despite the policy change in favor of dual citizenship over the past two and a half decades, the field remains highly contested in Germany. In their joint election program for the 2025 federal election, the CDU and CSU once again expressed their rejection of the reform and announced their intention to roll back the general acceptance of dual citizenship (Appendix II: Annex A3.1: *CDU; CSU 2025*). The AfD, which has emerged as a significant political force, goes even further by not only announcing its intention to abolish dual citizenship, but also to revert to the nationality law as it existed before 1990. This law provided for the exclusive acquisition of German citizenship either through birth to at least one German parent or through naturalization at the discretion of the state (Appendix II: Annex A3.1: *AfD 2025*). However, lacking the necessary majorities after the election, such a reversal – particularly within a grand coalition between the Union parties and the SPD – appears unlikely for the time being. Nevertheless, a corresponding reversal of the reform is conceivable, especially in light of changing power dynamics. Dual citizenship remains a contested issue and is rarely introduced or abolished permanently. Instead, it tends to evolve over time, influenced by political debates and broader policy dynamics. This is illustrated by multiple reforms in the Netherlands: while restrictions on dual citizenship in the context of naturalization were temporarily lifted in the early 1990s, they were reintroduced in 1997 (e.g., Böcker and Thränhardt 2006; Labussière and Vink 2020).

---

### Endnotes of Article 3

<sup>i</sup> I thank Sybille Münch and Holger Kolb for their useful comments on this paper.

<sup>ii</sup> The abbreviation F.D.P. was used until 2001. For simplicity, FDP is used throughout, except in quotations.

<sup>iii</sup> The regulation stipulates that a child of German emigrants born abroad still acquires German citizenship through the principle of descent. This then exists alongside any citizenship acquired through the territorial principle in the country of birth. However, for the third emigrant generation, the automatic acquisition of German citizenship was restricted

---

as part of the reform: It is no longer automatically acquired at birth abroad if the German parent was born abroad after December 31, 1999, and has their habitual residence there, unless the child would otherwise be stateless. However, German citizenship – and thus dual citizenship – can still be acquired relatively easily, provided that an application for registration of the birth in the birth register is submitted within one year of birth (Weinmann 2017).

<sup>iv</sup> The rest were undecided.

<sup>v</sup> The rest were undecided.

## 4.5 References

- Abali, Oya S. 2009. *German Public Opinion on Immigration and Integration*. Washington D.C.: Migration Policy Institute.
- Baaren, Luuk van der. 2020. "Dual Citizenship in the European Union: Trends and Analysis (2010-2020)." Florence.
- Bade, Klaus J., and Rainer Münz, eds. 2000. *Migrationsreport 2000. Fakten - Analysen - Perspektiven*. Frankfurt a.M./New York: Campus.
- Blatter, Joachim, Stefanie Erdmann, and Katja Schwanke. 2009. "Acceptance of Dual Citizenship: Empirical Data and Political Contexts. Working Paper Series 'Global Governance and Democracy' 2, Institute of Political Science University Lucerne." Lucerne.
- Böcker, Anita, and Dietrich Thränhardt. 2006. "Multiple Citizenship and Naturalization: An Evaluation of German and Dutch Policies." *Journal of International Migration and Integration* 7 (1): 71–94.
- Brubaker, Rogers. 1992. *Citizenship and Nationhood in France and Germany*. Cambridge, MA: Harvard University Press.
- Bundesrat. 2024a. "Archiv – Die Zusammensetzung des Bundesrates vom 13. April 1999 bis 28. September 1999." <https://www.bundesrat.de/SharedDocs/bilder/DE/galerien/stimmenverteilung-br/zusammensetzung-br.html>.
- . 2024b. "Archiv – Die Zusammensetzung des Bundesrates vom 18. Januar 2024 bis 10. Dezember 2024." <https://www.bundesrat.de/SharedDocs/bilder/DE/galerien/stimmenverteilung-br/zusammensetzung-br.html>.
- Cooper, A. Holmes. 2002. "Party-Sponsored Protest and the Movement Society: The CDU/CSU Mobilises Against Citizenship Law Reform." *German Politics* 11 (2): 88–104. <https://doi.org/10.1080/714001281>.

- Ersbøll, Eva. 2021. "The Danish Turn Towards Dual Citizenship." In *Dual Citizenship and Naturalisation*, edited by Rainer Bauböck and Max Haller, 157–82. Vienna: Verlag der Österreichischen Akademie der Wissenschaften. [https://doi.org/10.1553/978OEAW87752\\_Chapt08](https://doi.org/10.1553/978OEAW87752_Chapt08).
- Faist, Thomas, Jürgen Gerdes, and Beate Rieple. 2004. "Dual Citizenship as a Path-Dependent Process." *International Migration Review* 38 (3): 913–44. <https://doi.org/10.1111/j.1747-7379.2004.tb00224.x>.
- FORSA. 2013. "Doppelte Staatsbürgerschaft." 2013. [https://sozialministerium.baden-wuerttemberg.de/fileadmin/redaktion/m-sm/intern/downloads/Downloads\\_Forschung-Wissenschaft/Beibehaltung-bisherige-auslaend-Staatsbuergerschaft\\_Auswertung\\_2013.pdf](https://sozialministerium.baden-wuerttemberg.de/fileadmin/redaktion/m-sm/intern/downloads/Downloads_Forschung-Wissenschaft/Beibehaltung-bisherige-auslaend-Staatsbuergerschaft_Auswertung_2013.pdf).
- Gerdes, Jürgen, and Thomas Faist. 2006. "Von ethnischer zu republikanischer Integration." *Berliner Journal für Soziologie* 16 (3): 313–35. <https://doi.org/10.1007/s11609-006-0029-x>.
- Goodman, Sara Wallace. 2023. "Citizenship Studies: Policy Causes and Consequences." *Annual Review of Political Science* 26 (1): 135–52. <https://doi.org/10.1146/annurev-polisci-051921-102729>.
- Graeber, John. 2022. "Parties on the Left, Parties on the Right: Electoral Competition and Citizenship Policy Change in Europe." *British Journal of Political Science* 52 (1): 162–80. <https://doi.org/10.1017/S0007123420000368>.
- Green, Simon. 2000. "Beyond Ethnoculturalism? German Citizenship in the New Millennium." *German Politics* 9 (3): 105–24. <https://doi.org/10.1080/09644000008404609>.
- . 2005. "Between Ideology and Pragmatism: The Politics of Dual Nationality in Germany." *International Migration Review* 39 (4): 921–52.
- . 2006. "Zwischen Kontinuität und Wandel: Migrations- und Staatsangehörigkeitspolitik." In *Regieren in der Bundesrepublik Deutschland. Innen- und Außenpolitik seit 1949*, edited by Manfred G. Schmidt and Reimut Zohlnhöfer, 113–34. Wiesbaden: VS Verlag für Sozialwissenschaften.

- Gülzau, Fabian. 2025. "Whom Do We Naturalise? A Factorial Survey on Naturalisation Preferences in Germany." *Journal of Ethnic and Migration Studies*, 1–24. <https://doi.org/10.1080/1369183X.2025.2530634>.
- Gupta, Kuhika, Joseph T. Ripberger, Hank C. Jenkins-Smith, and Kristin Olofsson. 2025. "Coalition Opportunity Structures and Policy Change: A Comparative Analysis of Nuclear Facility Siting Efforts in the US." In *The Advocacy Coalition Framework*, edited by Hank C. Jenkins-Smith and Christopher M. Weible, 129–53. Cham: Springer Nature Switzerland. [https://doi.org/10.1007/978-3-031-85554-2\\_6](https://doi.org/10.1007/978-3-031-85554-2_6).
- Gustafson, Per. 2002. "Globalisation, Multiculturalism and Individualism: The Swedish Debate on Dual Citizenship." *Journal of Ethnic and Migration Studies* 28 (3): 463–81. <https://doi.org/10.1080/13691830220146554>.
- Heinmiller, B. Timothy. 2023. "Advocacy Coalitions, Power and Policy Change." *Policy & Politics* 51 (1): 28–46. <https://doi.org/10.1332/030557321X16569341758199>.
- . 2025. "Advocacy Coalitions 'In Power' and Major Policy Change in Canada: A Fuzzy Set Investigation." In *The Advocacy Coalition Framework*, edited by Hank C. Jenkins-Smith and Christopher M. Weible, 85–104. Cham: Springer Nature Switzerland. [https://doi.org/10.1007/978-3-031-85554-2\\_4](https://doi.org/10.1007/978-3-031-85554-2_4).
- Hermes, Georg. 2018. "Artikel 84 [Länderverwaltung und Bundesaufsicht]." In *Grundgesetz-Kommentar, Band III*, Rn. 5-9. Tübingen.
- Hofhansel, Claus. 2023. "The Waxing and Waning of Loyalty in German Citizenship." *German Politics* 32 (2): 191–208. <https://doi.org/10.1080/09644008.2021.1942851>.
- Howard, Marc Morjé. 2005. "Variation in Dual Citizenship Policies in the Countries of the EU." *International Migration Review* 39 (3): 697–720. <https://doi.org/10.1111/j.1747-7379.2005.tb00285.x>.
- . 2008. "The Causes and Consequences of Germany's New Citizenship Law." *German Politics* 17 (1): 41–62. <https://doi.org/10.1080/09644000701855127>.

- Ingold, Karin, and Frédéric Varone. 2012. "Treating Policy Brokers Seriously: Evidence from the Climate Policy." *Journal of Public Administration Research and Theory* 22 (2): 319–46. <https://doi.org/10.1093/jopart/mur035>.
- Janoski, Thomas. 2010. *The Ironies of Citizenship. Naturalization and Integration in Industrialized Countries*. Cambridge/New York: Cambridge University Press. <https://doi.org/10.1017/CBO9781107415324.004>.
- Jenkins-Smith, Hank C., and Paul A. Sabatier. 1993. "The Dynamics of Policy-Oriented Learning." In *Policy Change and Learning: An Advocacy Coalition Approach*, edited by Paul A. Sabatier and Hank C. Jenkins-Smith, 41–58. Boulder, Co: Westview Press.
- Joppke, Christian. 2003. "Citizenship between De- and Re-Ethnicization." *European Journal of Sociology* 44 (3): 429–58. <https://doi.org/10.1017/S0003975603001346>.
- Labussière, Marie, and Maarten Vink. 2020. "The Intergenerational Impact of Naturalisation Reforms: The Citizenship Status of Children of Immigrants in the Netherlands, 1995–2016." *Journal of Ethnic and Migration Studies* 46 (12): 2742–2763. <https://doi.org/10.1080/1369183X.2020.1724533>.
- Langenfeld, Christine. 2014. "Der Spinnen-Fliegen-Kompromiss; Exterior View from Christine Langenfeld from 2 April 2014." *Süddeutsche Zeitung* 2014: 2.
- Luft, Stefan. 2008. "Konfliktfelder um Staatsangehörigkeit und Integration." *Politische Studien* 59 (422): 42–53.
- Midtbøen, Arnfinn H. 2019. "No Longer the 'Last Man Standing': Norway Decides to Allow Dual Citizenship." EUI Global Citizenship Observatory-Blog. 2019. <https://globalcit.eu/no-longer-the-last-man-standing-norway-decides-to-allow-dual-citizenship/>.
- Mirilovic, Nikola. 2015. "Regime Type, International Migration, and the Politics of Dual Citizenship Toleration." *International Political Science Review* 36 (5): 510–25. <https://doi.org/10.1177/0192512114535451>.

- Murray, Laura M. 1994. "Einwanderungsland Bundesrepublik Deutschland? Explaining the Evolving Positions of German Political Parties on Citizenship Policy." *German Politics & Society* 33: 23–56.
- Natter, Katharina, Mathias Czaika, and Hein de Haas. 2020. "Political Party Ideology and Immigration Policy Reform: An Empirical Enquiry." *Political Research Exchange* 2 (1): 1–26. <https://doi.org/0.1080/2474736X.2020.1735255>.
- Naujoks, Daniel. 2009. "Dual Citizenship. The Discourse on Ethnic and Political Boundary-Making in Germany. Focus Migration Policy Brief." Bonn. [www.bpb.de/files/EKQGBO.pdf](http://www.bpb.de/files/EKQGBO.pdf).
- Oers, Ricky van, Betty de Hart, and Kees Groenendijk. 2013. *EUDO Citizenship Observatory. Country Report: The Netherlands*. Florence: EUDO.
- Pierce, Jonathan J., Holly L. Peterson, and Katherine C. Hicks. 2020. "Policy Change: An Advocacy Coalition Framework Perspective." *Policy Studies Journal* 48 (1): 64–86. <https://doi.org/10.1111/psj.12223>.
- Rasmussen, Anne, Lars Kai Mäder, and Stefanie Reher. 2018. "With a Little Help From The People? The Role of Public Opinion in Advocacy Success." *Comparative Political Studies* 51 (2): 139–64. <https://doi.org/10.1177/0010414017695334>.
- Renner, Günter. 1999. "Was ist neu am neuen deutschen Staatsangehörigkeitsrecht?" *Zeitschrift für Ausländerrecht und Ausländerpolitik* 19 (4): 154–63.
- Ripoll Servent, Ariadna, and Florian Trauner. 2014. "Do Supranational EU Institutions Make a Difference? EU Asylum Law before and after 'Communitarization.'" *Journal of European Public Policy* 21 (8): 1142–62. <https://doi.org/10.1080/13501763.2014.906905>.
- Sabatier, Paul A. 1987. "Knowledge, Policy-Oriented Learning, and Policy Change." *Knowledge* 8 (4): 649–92. <https://doi.org/10.1177/0164025987008004005>.
- . 1993. "Policy Change over a Decade or More." In *Policy Change and Learning: An Advocacy Coalition Approach*, edited by Paul A. Sabatier and Hank C. Jenkins-Smith, 13–93. Boulder, Co: Westview Press.

- . 1998. “The Advocacy Coalition Framework: Revisions and Relevance for Europe.” *Journal of European Public Policy* 5 (1): 98–130.  
<https://doi.org/10.1080/13501768880000051>.
- Sabatier, Paul A., and Christopher M. Weible. 2007. “The Advocacy Coalition Framework. Innovations and Clarifications.” In *Theories of the Policy Process*, edited by Paul A. Sabatier, 189–220. Boulder, Co: Westview Press.
- Schmitt-Beck, Rüdiger. 2000. “Die Hessische Landtagswahl vom 7. Februar 1999: Der Wechsel nach dem Wechsel.” *Zeitschrift für Parlamentsfragen* 31 (1): 3–17.
- Sejersen, Tanja Brøndsted. 2008. “‘I Vow to Thee My Countries’ - The Expansion of Dual Citizenship in the 21st Century.” *International Migration Review* 42 (3): 523–49. <https://doi.org/10.1111/j.1747-7379.2008.00136.x>.
- Shin, Geiguen. 2019. “Advocacy Coalition Framework and the US Immigration Policy.” In *Global Encyclopedia of Public Administration, Public Policy, and Governance*, edited by Ali Farazmand, 1–7. Cham: Springer International Publishing. [https://doi.org/10.1007/978-3-319-31816-5\\_3647-1](https://doi.org/10.1007/978-3-319-31816-5_3647-1).
- Siegel, Madeleine, Jonas Köhler, Doreen Chouaibi, Jörg Dollmann, Jannes Jacobsen, Almuth Lietz, and Michaela Schmälzle. 2023. *Wie beurteilt die deutsche Bevölkerung die Reform des Staatsangehörigkeitsrechts? Eine Analyse des DeZIM.Panels*. Berlin: DeZIM.
- Statistisches Bundesamt. 2024. “Statistischer Bericht - Einbürgerungen 2023.” Wiesbaden.
- Thym, Daniel. 2024. *Staatsangehörigkeit und “Doppelpass”: Legitime Symbolik und theoretische Fallstricke*. FGZ Working Paper Nr. 9. Leipzig: FGZ.
- Tsebelis, George. 1995. “Decision Making in Political Systems: Veto Players in Presidentialism, Parliamentarism, Multicameralism and Multipartyism.” *British Journal of Political Science* 25 (3): 289–325.
- Vink, Maarten, Arjan H. Shakel, David Reichel, Ngo Chun Luk, and Gerard-Rene De Groot. 2019. “The International Diffusion of Expatriate Dual Citizenship.” *Migration Studies* 7 (3): 362–83. <https://doi.org/10.1093/migration/mnz011>.

- Wachuku, Vanessa Chidi. 2019. *Promoting and Challenging Immigration Detention in Canada: Understanding the Role of Advocacy Coalition Groups in Canada's Immigration Detention Policy Subsystem*. RCIS Working Paper No. 2019/2. Toronto: Ryerson Centre for Immigration & Settlement.
- Weible, Christopher M., and Hank C. Jenkins-Smith. 2016. "The Advocacy Coalition Framework: An Approach for the Comparative Policy Analysis of Contentious Policy Issues." In *Contemporary Approaches to Public Policy. Theories, Controversies and Perspectives*, edited by B. Guy Peters and Philippe Zittoun, 15–34. London: Palgrave Macmillan.
- Weible, Christopher M., Paul A. Sabatier, and Kelly McQueen. 2009. "Themes and Variations: Taking Stock of the Advocacy Coalition Framework." *Policy Studies Journal* 37 (1): 121–40. <https://doi.org/10.1111/j.1541-0072.2008.00299.x>.
- Weinmann, Martin. 2017. "Doppelpass mit Generationenschnitt. Modell und Umsetzungsmöglichkeiten." *Zeitschrift für Rechtspolitik* 50 (5): 144–147.
- . 2024. "Modernisation of German Citizenship: Completing the Paradigm Shift of 2000." EUI Global Citizenship Observatory-Blog. <https://globalcit.eu/modernisation-of-german-citizenship-completing-the-paradigm-shift-of-2000/>.
- Worbs, Susanne. 2014. *Bürger auf Zeit. Die Wahl der Staatsangehörigkeit im Kontext der deutschen Optionsregelung. Beiträge zu Migration und Integration, Band 7*. Nürnberg: BAMF.

## 5. Summary and conclusion of the thesis

This dissertation investigates the role of dual citizenship with regard to political membership and the drawing of democratic boundaries. It makes a significant contribution to understanding how dual citizenship policies influence democratic membership and the overall quality of democracy by integrating normative, empirical, and process-oriented perspectives. By framing dual citizenship as a dimension of democratic quality, I highlight how both overly expansive and overly restrictive regulations create distinct yet equally relevant challenges for democratic inclusion. This sets the stage for the entire thesis, which is driven by the overarching research question: *How do dual citizenship policies influence democratic membership and the quality of democracy?* I address this question through a multi-dimensional analytical approach spanning macro, micro, and meso levels.

This cumulative dissertation consists of three articles, focusing on the following key dimensions: the establishment and operationalization of normative criteria for evaluating the democratic quality of dual citizenship policies and the normative comparison of existing policies (Article 1); the examination of how dual citizenship policies affect individual behavior and thereby political membership (Article 2); and the investigation of how these policies change to better meet normative criteria (Article 3).

### 5.1 Main findings

Overall, the dissertation demonstrates that the quality of democratic citizenship is not merely a function of abstract ideals, but emerges from the dynamic interplay between policies and legal frameworks, individual perceptions and behavior, as well as institutions, beliefs and advocacy. It thus addresses concerns about the resilience and legitimacy of democratic systems by showing how the definition and allocation of political membership – through (dual) citizenship policy – can either reinforce or undermine democratic quality in times of increasing international mobility.

The combined findings of the three articles show that macro-level policies do not operate in isolation but actively shape individual choices and perceptions, which are central to political inclusion and democratic membership. At the same time, meso-level processes reveal how political advocacy and institutional dynamics can influence and

transform macro-level frameworks, aligning them more closely with normative democratic principles.

The key takeaway from the dissertation can be summarized as follows: While dual citizenship policies should align with democratic theory to establish legitimate and inclusive boundaries of political membership, many existing policies are either too restrictive or too permissive, resulting in democratic deficits that weaken the quality of democracy. This is demonstrated, among other things, by the fact that restrictive dual citizenship policies – both in countries of origin and residence – discourage naturalization, thereby reducing political inclusion and the congruence between resident and voting populations. However, these policies are dynamic and subject to ongoing political negotiation and contestation, leaving room for more democratic and inclusive reforms over time.

## **5.2 Main contributions**

Conceptually, the core contribution of the dissertation lies in its integrative framework that connects normative theory, empirical analysis, and policy studies, bridging multiple subfields of political science – including democratic theory, political sociology, citizenship studies, and policy analysis. The three articles are united by a common focus on how dual citizenship policies mediate democratic inclusion, with each addressing different levels of analysis – normative evaluation of policies, empirical patterns of naturalization, and the political dynamics of policy change – thus collectively providing a holistic understanding of democratic membership in the context of migration.

This is achieved through a triangulation of diverse methodological approaches: a systematic comparison and description of policies based on normative criteria; a quantitative analysis of micro-level data that incorporates both macro-level aspects and individual-level factors; and policy process research to examine policy change. Citizenship, as a complex political phenomenon, demands such a multi-perspective approach. This layered framework illustrates how macro-level policies influence micro-level behaviors, such as naturalization decisions, while meso-level political processes and actors – particularly advocacy coalitions – play a crucial role in transforming those macro-level policies.

In doing so, the dissertation reveals that the quality of democracy is shaped not only by abstract ideals but also through the dynamic interplay of policies and legal structures, individual perceptions and behavior, as well as political beliefs and advocacy efforts. Ultimately, it underscores that the question of who belongs to the demos is not fixed but continuously shaped by legal norms, individual choices, and political processes.

Overall, the main methodological and theoretical contribution lies in the fact that the three articles collectively provide a comprehensive multi-dimensional analysis, capturing the complex ways in which dual citizenship policies shape democratic membership and the overall quality of democracy. This integrated approach advances theoretical understanding by bridging democratic theory with empirical research and policy analysis, while also offering practical guidance on how democracies can effectively respond to the challenges posed by globalization and increased international mobility to foster more inclusive forms of democratic membership.

### **5.3 Limitations and perspectives for future research**

As with any research endeavor, a fundamental consideration lies in assessing the scope and generalizability of its findings. To what extent can the findings be applied beyond the specific context under study? This question is particularly pertinent when evaluating the broader relevance and applicability of the findings.

First, this study leaves unresolved important questions concerning variation across states. For example, why do some states differentiate between migrant groups in granting or restricting dual citizenship, while others apply uniform rules? Literature points to a range of explanatory factors, including “different historic starting points and conditions” (Winter 2014, 48), political integration strategies for immigrants as well as diaspora engagement efforts aimed at strengthening ties with citizens abroad (Sejersen 2008), or so-called “preferential membership policies” (Dumbrava 2014b). A deeper understanding of these motivations could be gained through comparative case studies, especially those combining legal analysis with qualitative research on political debates, legislative processes, and public discourse. While this study provides an illustrative example through the examination of policy change in Germany, further research – ideally involving comparative analyses of similar or contrasting reforms –

would be valuable. Such comparative studies are particularly relevant in light of the liberalization of citizenship laws on the one hand and restrictions on the other, especially since both are intended to address the ongoing challenges of integrating immigrants (Dumbrava 2025, 8).

Another limitation concerns the distinction between formal policies and their administrative implementation. This study focuses on the legal-institutional level – primarily the design, evolution and consequences of dual citizenship policies – but does not engage in depth with how these rules are applied in practice. Yet uniform legal standards do not necessarily yield uniform bureaucratic outcomes. What appears legally possible or impossible can, in practice, lead to different results. Research has highlighted significant regional variation in the application of dual citizenship policies, shaped by local political dynamics and demographic factors, even under identical national regulations (Schneider and Zuber 2025; Mende and Zuber 2025). In light of such evidence suggesting uneven implementation across administrative units of a state or immigrants of different origins, the gap between formal rules and administrative implementation deserves more systematic investigation. Future research should therefore examine divergent decision-making practices in assessing the fulfillment of legal requirements, as well as the influence of organizational culture on how willing naturalization authorities are to allocate (personnel) resources (Mende and Zuber 2025). These aspects become particularly relevant in the context of Germany’s recent citizenship reform, which is expected to lead to a substantial increase in applications. This reform coincides with an already significant backlog of unresolved cases, pointing to possible implementation failures due to overburdened administrative structures (Gülzau and Schneider 2024).

Moreover, this study is situated within the context of affluent democracies in Europe. As such, its findings may have limited applicability to countries in Latin America, East Asia, or other regions. Importantly, migration is not confined to the liberal democratic West. Migrants frequently move between dissimilar regime types – from democracies to autocracies and vice versa – challenging normative frameworks that assume shared political values or institutional compatibility. Future research would therefore benefit from broadening both the geographical and political scope of inquiry, incorporating cases beyond Europe and adopting a more global and comparative perspective (Goodman 2023).

In light of these limitations, several promising avenues for future research emerge. First, there is a need to systematically explore how citizenship policies reflect broader democratic principles – or fall short of them. Comparative studies could assess the extent to which states differentiate between migrant groups with regard to dual citizenship for normative reasons or due to pragmatic or strategic considerations. Second, the EU context presents a particularly interesting field for further inquiry. Despite shared legal and normative frameworks, member states diverge significantly in their citizenship regimes. What shapes these differences and similarities? How do national differences influence common EU citizenship? Further research should also investigate the inconsistencies and contradictions between EU citizenship and national citizenship laws, and how these tensions affect the coherence and legitimacy of European democratic governance (Orgad 2019).

In sum, while this study offers a multi-dimensional perspective on dual citizenship in democratic contexts, it also identifies conceptual and empirical gaps that invite broader, comparative, and interdisciplinary research. Addressing these questions is essential for understanding the evolving nature of citizenship in an era characterized by increasing international mobility, political fragmentation, and normative contestation.

#### **5.4 Implications and outlook**

This study also carries important implications for citizenship policy, particularly with regard to immigrant integration and democratic inclusion. Exclusive dual citizenship policies continue to pose a significant barrier to the political integration of immigrants in their country of residence. Naturalization remains the primary pathway to full political rights for immigrants in most democratic polities (Pedroza 2015), and the requirement to renounce a prior citizenship or automatically lose it can discourage eligible individuals from applying. This is especially the case when dual citizenship policies involve not only legal obstacles but also symbolic dimensions of membership tied to the act of citizenship change. Recognizing dual citizenship can help reduce such barriers by allowing for political inclusion without requiring a break with one's identity, while simultaneously allowing emigrants and their descendants to maintain existing political ties. At the same time, avoiding dual citizenship can be justified when such ties weaken or no longer exist across generations.

A particularly relevant issue arises in the European context, where Union citizenship is derived from national citizenship. Yet significant disparities persist across EU member states regarding dual citizenship policies. Immigrants from third countries may acquire EU citizenship besides their origin country's citizenship relatively easily in one member state, while their compatriots may be barred from doing so in another. Conversely, emigrants may face very different consequences depending on their country of origin: while some may lose both their national and EU citizenship upon naturalizing in a third country, others retain both and may even transmit them without restriction to future generations.

Despite gradual liberalization trends, dual citizenship remains a contested issue – both in Germany and in many other countries. This is evident, among other things, in the example of Germany, where the CDU and CSU emphasized in their joint election program for the 2025 federal election that they reject the recent reform and want to reverse the acceptance of dual citizenship. A corresponding reversal of the reform is therefore conceivable, especially in view of changing power relations. Accordingly, dual citizenship is not simply introduced or abolished once and for all, but often proves to be subject to change, depending on political debates and broader policy dynamics. This is demonstrated by several reforms in the Netherlands: while restrictions on dual citizenship in the context of naturalization had been temporarily abolished in the early 1990s, they were reintroduced in 1997 (Böcker and Thränhardt 2006; Labussière and Vink 2020; Peters and Vink 2024).

The findings of this study point to persisting democratic deficits where states apply differentiated rules to different migrant groups. This is problematic not only in terms of equal treatment and anti-discrimination (Spiro 2011), but also because inconsistent standards may foster patterns of democratic under- and over-inclusiveness.

Finally, the dissertation contributes to the broader discussion about the future of democracy (e.g., van Beek and Wnuk-Lipinski 2012; Merkel 2015; Levitsky and Ziblatt 2018). In this context, debates around membership, inclusion, and exclusion have taken on renewed urgency (Preuss 1998; Orgad 2019; Paparusso and Wihtol de Wenden 2025; Wihtol de Wenden 2025). By framing dual citizenship as a dimension of democratic quality, this dissertation provides both a diagnosis of the legitimacy

challenges facing contemporary democracies and an optimistic outlook on how democratic states can resolve tensions between inclusion and exclusion through policy change. The findings suggest that even in restrictive regimes, democratic reform is possible. Recent developments – including Germany’s policy change toward recognizing dual citizenship – demonstrate that citizenship law is not static, but responsive to broader normative debates and political dynamics. Such changes open up space for more inclusive policies that better reflect the realities of transnational mobility and integration.

In sum, this study highlights not only the tensions and inconsistencies within and between citizenship regimes, but also the potential for democratic renewal through more inclusive and coherent approaches to citizenship policy. Future reforms should aim to reduce arbitrary differentiation, strengthen political inclusion, and align legal practice more closely with democratic principles. The dissertation offers an optimistic outlook on such change by highlighting the potential to gradually address and resolve these tensions within democratic states through ongoing processes of negotiation. However, in light of the aforementioned securitization of migration, rising anti-immigrant sentiments, and the surge of populism (von Rosen 2019; Kapelner 2024), the feasibility of such change remains questionable. Nevertheless, despite a polarized debate on this issue within Germany itself, the country – traditionally known for its rather restrictive citizenship policies – has moved towards a more liberal and open approach, contrary to “a more restrictive trend in citizenship policies” (Dumbrava 2025, 8) in many other countries.

## 6. References for Chapter 1 & 5

- Abizadeh, Arash. 2008. "Democratic Theory and Border Coercion. No Right to Unilaterally Control Your Own Borders." *Political Theory* 36 (1): 37–65.
- . 2012. "On the Demos and Its Kin: Nationalism, Democracy, and the Boundary Problem." *American Political Science Review* 106 (4): 867–82. <https://doi.org/10.1017/S0003055412000421>.
- Ambrose, Don. 2019. "The Erosion of Democracy: Can We Muster Enough Wisdom to Stop It?" In *Applying Wisdom to Contemporary World Problems*, edited by Robert J. Sternberg, Howard C. Nusbaum, and Judith Glück, 21–50. London: Palgrave Macmillan.
- Angeli, Oliviero. 2015. *Cosmopolitanism, Self-Determination and Territory. Justice with Borders*. Basingstoke: Palgrave Macmillan UK.
- Arrhenius, Gustaf. 2018. "The Democratic Boundary Problem Reconsidered." *Ethics, Politics & Society* 1 (May): 89–122. <https://doi.org/10.21814/eps.1.1.52>.
- Auer, Daniel, and Max Schaub. 2024. "Mass Emigration and the Erosion of Liberal Democracy." *International Studies Quarterly* 68 (2). <https://doi.org/10.1093/isq/sqae026>.
- Baaren, Luuk van der. 2020. "Dual Citizenship in the European Union: Trends and Analysis (2010-2020)." Florence.
- Bauböck, Rainer. 2005. "Expansive Citizenship: Voting Beyond Territory and Membership." *Political Science and Politics* 38 (4): 683–87.
- . 2007. "Stakeholder Citizenship and Transnational Political Participation: A Normative Evaluation of External Voting." *Fordham Law Review* 75 (5): 2393–2447.
- . 2009. "The Rights and Duties of External Citizenship." *Citizenship Studies* 13 (5): 475–99. <https://doi.org/10.1080/13621020903174647>.
- . 2015. "Morphing the Demos into the Right Shape. Normative Principles for Enfranchising Resident Aliens and Expatriate Citizens." *Democratization* 22 (5): 820–39. <https://doi.org/10.1080/13510347.2014.988146>.

- . 2017. “Political Membership and Democratic Boundaries.” In *The Oxford Handbook of Citizenship*, edited by Ayelet Shachar, Rainer Bauböck, Irene Bloemraad, and Maarten Vink, 59–82. Oxford, UK: Oxford University Press. <https://doi.org/10.1093/oxfordhb/9780198805854.013.3>.
- . 2018a. “Democratic Inclusion: A Pluralist Theory of Citizenship.” In *Democratic Inclusion. Rainer Bauböck in Dialogue*, edited by Rainer Bauböck, 3–102. Manchester: Manchester University Press.
- Beek, Ursula van, and Edmund Wnuk-Lipinski, eds. 2012. *Democracy under Stress. The Global Crisis and Beyond*. Opladen/Berlin/Farmington Hills: Barbara Budrich Publishers.
- Bennett, W Lance, and Marianne Kneuer. 2024. “Communication and Democratic Erosion: The Rise of Illiberal Public Spheres.” *European Journal of Communication* 39 (2): 177–96. <https://doi.org/10.1177/02673231231217378>.
- Bertsou, Eri. 2019. “Rethinking Political Distrust.” *European Political Science Review* 11 (2): 213–30. <https://doi.org/10.1017/S1755773919000080>.
- Bevelander, Pieter, and Justus Veenman. 2006. “Naturalization and Socioeconomic Integration: The Case of the Netherlands. IZA Discussion Paper No. 2153.” Bonn.
- Blatter, Joachim. 2011. “Dual Citizenship and Theories of Democracy.” *Citizenship Studies* 15 (6–7): 769–98. <https://doi.org/10.1080/13621025.2011.600090>.
- Böcker, Anita, and Dietrich Thränhardt. 2006. “Multiple Citizenship and Naturalization: An Evaluation of German and Dutch Policies.” *Journal of International Migration and Integration* 7 (1): 71–94.
- Bordin, Elisa, and Rómulo Pinheiro. 2022. “The Race to Institutional Change: The Slow Road to Policy Change in Sexuality Education.” In *Governing Complexity in Times of Turbulence*, edited by Jarle Trondal, Robyn Keast, David Noble, and Rómulo Pinheiro, 146–68. Cheltenham/Northampton: Edward Elgar Publishing. <https://doi.org/10.4337/9781800889651.00019>.
- Brubaker, Rogers. 1992. *Citizenship and Nationhood in France and Germany*. Cambridge, MA: Harvard University Press.

- Cairney, Paul. 2023. "The Politics of Policy Analysis: Theoretical Insights on Real World Problems." *Journal of European Public Policy* 30 (9): 1820–38. <https://doi.org/10.1080/13501763.2023.2221282>.
- Cammack, Paul. 1998. "Globalization and the Death of Liberal Democracy." *European Review* 6 (2): 249–63. <https://doi.org/10.1017/S1062798700003264>.
- Carens, J.H. 2016. "In Defense of Birthright Citizenship." In *Migration in Political Theory. The Ethics of Movement and Membership*, edited by Sarah Fine and Lea Ypi, 205–24. Oxford, UK: Oxford University Press.
- Castles, Stephen, and Marc J. Miller. 1993. *The Age of Migration: International Population Movements in the Modern World*. New York: The Guilford Press.
- Cerny, Philip G. 1999. "Globalization and the Erosion of Democracy." *European Journal of Political Research* 36 (1): 1–26. <https://doi.org/https://doi.org/10.1023/A:1007099906532>.
- Chavez, Pablo Lizarraga. 1997. "Creating a United States-Mexico Political Double Helix: The Mexican Government's Proposed Dual Nationality Amendment." *Stanford Journal of International Law* 33 (1): 119–51.
- Chiswick, Barry R., and Paul W. Miller. 2009. "Citizenship in the United States: The Roles of Immigrant Characteristics and Country of Origin." In *Ethnicity and Labor Market Outcomes (Research in Labor Economics, Volume 29)*, edited by Amelie F. Constant, Konstantinos Tatsiramos, and Klaus F. Zimmerman, 91–130. Bingley: Emerald Group Publishing Limited.
- d'Annibale, Eleonora, and Helder De Schutter. 2025. "Of Borders and Ballots." *Democratic Theory* 12 (1): 1–14. <https://doi.org/10.3167/dt.2025.120101>.
- Dahl, Robert A. 1970. *After the Revolution? Authority in a Good Society*. New Haven/New York: Yale University Press.
- . 1989. *Democracy and Its Critics*. New Haven/London: Yale University Press.
- DeVoretz, Don J. 2008. "The Economics of Citizenship: A Common Intellectual Ground for Social Scientists?" *Journal of Ethnic and Migration Studies* 34 (4): 679–93. <https://doi.org/10.1080/13691830801961688>.

- Diehl, Claudia, and Michael Blohm. 2001. "Apathy, Adaptation or Ethnic Mobilisation? On the Attitudes of a Politically Excluded Group." *Journal of Ethnic and Migration Studies* 27 (3): 401–20.  
<https://doi.org/10.1080/136918301200266149>.
- . 2003. "Rights or Identity? Naturalization Processes among 'Labour Migrants' in Germany." *The International Migration Review* 37 (1): 133–62.
- . 2011. "Naturalization as Boundary Crossing. Evidence from Labour Migrants in Germany." In *Identity and Participation in Culturally Diverse Societies*, edited by Assaad E. Azzi, Xenia Chrysochoou, Bert Klandermans, and Bernd Simon, 315–37. Oxford, UK: Wiley-Blackwell.  
<https://doi.org/10.1002/9781444328158.ch16>.
- Dorn, Nicholas. 2014. *Democracy and Diversity in Financial Market Regulation*. London: Routledge. <https://doi.org/10.4324/9781315884233>.
- Dronkers, Jaap, and Maarten Vink. 2012. "Explaining Access to Citizenship in Europe: How Citizenship Policies Affect Naturalization Rates." *European Union Politics* 13 (3): 390–412. <https://doi.org/10.1177/1465116512440510>.
- Dumbrava, Costica. 2014a. "External Citizenship in EU Countries." *Ethnic and Racial Studies* 37 (13): 2340–60.  
<https://doi.org/10.1080/01419870.2013.826812>.
- . 2014b. *Nationality, Citizenship and Ethno-Cultural Belonging. Preferential Membership Policies in Europe*. Palgrave M. Basingstoke.
- . 2025. "Acquisition and Loss of Citizenship in EU Member States. Overview and Key Issues. Briefing." Brussels.  
[https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/769502/EPRS\\_BR I\(2025\)769502\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/769502/EPRS_BR I(2025)769502_EN.pdf).
- Faist, Thomas. 2004. "Dual Citizenship as Overlapping Membership." In *International Migration in the New Millennium. Global Movement and Settlement*, edited by Danièle Joly, 210–31. Hants/Burlington: Ashgate.

- Faist, Thomas, Jürgen Gerdes, and Beate Rieple. 2004. "Dual Citizenship as a Path-Dependent Process." *International Migration Review* 38 (3): 913–44. <https://doi.org/10.1111/j.1747-7379.2004.tb00224.x>.
- Faist, Thomas, and Triadafilos Triadafilopoulos. 2006. "Beyond Nationhood: Citizenship Politics in Germany Since Unification. Controversies in Global Politics & Societies. Occasional Paper No. 1 2006." Toronto.
- Falcke, Swantje, and Floris Peters. 2025. "Rescaling Citizenship: Revisiting Debates on Territory, Rights, and Membership." *Journal of Ethnic and Migration Studies*, September, 1–28. <https://doi.org/10.1080/1369183X.2025.2550109>.
- Galston, William A. 2020. "The Enduring Vulnerability of Liberal Democracy." *Journal of Democracy* 31 (3): 8–24.
- Gerdes, Jürgen, and Thomas Faist. 2006. "Von ethnischer zu republikanischer Integration." *Berliner Journal für Soziologie* 16 (3): 313–35. <https://doi.org/10.1007/s11609-006-0029-x>.
- Gerschewski, Johannes. 2021. "Erosion or Decay? Conceptualizing Causes and Mechanisms of Democratic Regression." *Democratization* 28 (1): 43–62. <https://doi.org/10.1080/13510347.2020.1826935>.
- Giovannini, Arianna, and Matthew Wood. 2022. "Understanding Democratic Stress." *Representation* 58 (1): 1–12. <https://doi.org/10.1080/00344893.2021.2019821>.
- GLOBALCIT. 2025a. "Country Profiles." Florence. <https://globalcit.eu/country-profiles/>.
- . 2025b. "Global Nationality Laws Database." Florence. <https://globalcit.eu/national-citizenship-laws/>.
- Goodin, Robert E. 2007. "Enfranchising All Affected Interests, and Its Alternatives." *Philosophy & Public Affairs* 35 (1): 40–68. <https://doi.org/10.1111/j.1088-4963.2007.00098.x>.
- Goodman, Sara Wallace. 2023. "Citizenship Studies: Policy Causes and Consequences." *Annual Review of Political Science* 26 (1): 135–52. <https://doi.org/10.1146/annurev-polisci-051921-102729>.

- Green, Simon. 2000. "Beyond Ethnoculturalism? German Citizenship in the New Millennium." *German Politics* 9 (3): 105–24.  
<https://doi.org/10.1080/09644000008404609>.
- . 2005. "Between Ideology and Pragmatism: The Politics of Dual Nationality in Germany." *International Migration Review* 39 (4): 921–52.
- . 2006. "Zwischen Kontinuität und Wandel: Migrations- und Staatsangehörigkeitspolitik." In *Regieren in der Bundesrepublik Deutschland. Innen- und Außenpolitik seit 1949*, edited by Manfred G. Schmidt and Reimut Zohlnhöfer, 113–34. Wiesbaden: VS Verlag für Sozialwissenschaften.
- Gülzau, Fabian, and Jan Schneider. 2024. "Neue Wege, neue Hürden? Die Staatsangehörigkeitsrechtsreform und mögliche Folgen für Behörden und vulnerable Gruppen. SVR-Policy Brief 2024-1." Berlin. [https://www.svr-migration.de/wp-content/uploads/2024/06/v4\\_SVR\\_PB\\_Neue-Wege-neue-Huerden-final-mit-Navi.pdf](https://www.svr-migration.de/wp-content/uploads/2024/06/v4_SVR_PB_Neue-Wege-neue-Huerden-final-mit-Navi.pdf).
- Hammar, Tomas. 1985. "Dual Citizenship and Political Integration." *International Migration Review* 19 (3): 438–450.
- . 1990. *Democracy and the Nation State: Aliens, Denizens and Citizens in a World of International Migration*. Avebury: Aldershot.
- Helgertz, Jonas, and Pieter Bevelander. 2017. "The Influence of Partner Choice and Country of Origin Characteristics on the Naturalization of Immigrants in Sweden: A Longitudinal Analysis." *International Migration Review* 51 (3): 667–700. <https://doi.org/10.1111/imre.12244>.
- Hollifield, James F. 1986. "Immigration Policy in France and Germany: Outputs versus Outcomes." *The ANNALS of the American Academy of Political and Social Science* 485 (1): 113–28. <https://doi.org/10.1177/0002716286485001010>.
- Honohan, Iseult. 2011. "Should Irish Emigrants Have Votes? External Voting in Ireland." *Irish Political Studies* 26 (4): 545–61.  
<https://doi.org/10.1080/07907184.2011.619749>.

- Howard, Marc Morjé. 2005. "Variation in Dual Citizenship Policies in the Countries of the EU." *International Migration Review* 39 (3): 697–720.  
<https://doi.org/10.1111/j.1747-7379.2005.tb00285.x>.
- . 2008. "The Causes and Consequences of Germany's New Citizenship Law." *German Politics* 17 (1): 41–62. <https://doi.org/10.1080/09644000701855127>.
- Huddleston, Thomas. 2020. "Naturalisation in Context: How Nationality Laws and Procedures Shape Immigrants' Interest and Ability to Acquire Nationality in Six European Countries." *Comparative Migration Studies* 8 (18).  
<https://doi.org/10.1186/s40878-020-00176-3>.
- Huddleston, Thomas, and Jasper Dag Tjaden. 2012. "Immigrant Citizens Survey. How Immigrants Experience Integration in 15 European Cities." Brussels.
- Jones-Correa, Michael. 2001. "Under Two Flags: Dual Nationality in Latin America and Its Consequences for Naturalization in the United States." *International Migration Review* 35 (4): 997–1029. <https://doi.org/10.1111/j.1747-7379.2001.tb00050.x>.
- Joppke, Christian. 1999. "How Immigration Is Changing Citizenship: A Comparative View." *Ethnic and Racial Studies* 22 (4): 629–52.  
<https://doi.org/10.1080/014198799329323>.
- . 2003. "Citizenship between De- and Re-Ethnicization." *European Journal of Sociology* 44 (3): 429–58. <https://doi.org/10.1017/S0003975603001346>.
- Kapelner, Zsolt. 2024. "Anti-Immigrant Backlash: The Democratic Dilemma for Immigration Policy." *Comparative Migration Studies* 12 (1): 12.  
<https://doi.org/10.1186/s40878-024-00370-7>.
- Keck, Thomas M. 2023. "Erosion, Backsliding, or Abuse: Three Metaphors for Democratic Decline." *Law & Social Inquiry* 48 (1): 314–39.  
<https://doi.org/10.1017/lis.2022.43>.
- Klusmeyer, Douglas B., and Demetrios G. Papademetriou. 2009. *Immigration Policy in the Federal Republic of Germany: Negotiating Membership and Remaking the Nation*. New York: Berghan Books.

- Kneuer, Marianne. 2021. "Unravelling Democratic Erosion: Who Drives the Slow Death of Democracy, and How?" *Democratization* 28 (8): 1442–62. <https://doi.org/10.1080/13510347.2021.1925650>.
- Kochenov, Dimitry, and Justin Lindeboom. 2019. "Quality of Nationality Index, Mendeley Data, V1." Groningen. <https://doi.org/10.17632/53zr7cfyrs.1#file-64e21222-a029-4803-81b0-cab1fba47ceb>.
- Kuzelewska, Elzbieta, Amy Weatherburn, and Dariusz Kloza, eds. 2018. *Irregular Migration as a Challenge for Democracy*. Cambridge, UK: Intersentia. <https://doi.org/10.1017/9781780687025>.
- la Torre, Carlos de, and Andrés Ortiz Lemos. 2016. "Populist Polarization and the Slow Death of Democracy in Ecuador." *Democratization* 23 (2): 221–41. <https://doi.org/10.1080/13510347.2015.1058784>.
- Labussière, Marie, and Maarten Vink. 2020. "The Intergenerational Impact of Naturalisation Reforms: The Citizenship Status of Children of Immigrants in the Netherlands, 1995–2016." *Journal of Ethnic and Migration Studies*. <https://doi.org/10.1080/1369183X.2020.1724533>.
- Laebens, Melis G., and Anna Lührmann. 2023. "What Halts Democratic Erosion? The Changing Role of Accountability." In *Resilience of Democracy. Responses to Illiberal and Authoritarian Challenges*, edited by Anna Lührmann and Wolfgang Merkel, 40–60. London: Routledge.
- Levitsky, Steven, and Daniel Ziblatt. 2018. *How Democracies Die*. New York: Crown.
- Linquiti, Peter. 2024. "Operationalizing Lasswell's Call for Clarification of Value Goals: An Equity-Based Approach to Normative Public Policy Analysis." *Policy Sciences* 57 (1): 193–219. <https://doi.org/10.1007/s11077-024-09525-w>.
- Logan, John R., Sookhee Oh, and Jennifer Darrah. 2012. "The Political and Community Context of Immigrant Naturalization." *Journal of Ethnic and Migration Studies* 38 (4): 535–54. <https://doi.org/10.1080/1369183X.2012.659116>.

- Lopez-Guerra, Claudio. 2005. "Should Expatriates Vote?" *Journal of Political Philosophy* 13 (2): 216–34. <https://doi.org/10.1111/j.1467-9760.2005.00221.x>.
- Masing, Johannes. 2001. *Wandel im Staatsangehörigkeitsrecht vor den Herausforderungen moderner Migration*. Tübingen: Mohr Siebeck.
- Mazzolari, Francesca. 2005. "Determinants of Naturalization: The Role of Dual Citizenship Laws. Working Paper 117." San Diego.
- Mende, Lisa, and Christina Zuber. 2025. "AdmInCit Praxispapier. Unterschiede in der Einbürgerungspraxis in deutschen Kommunen: Vergleichen, verstehen und verändern." Konstanz.
- Merkel, Wolfgang, ed. 2015. *Demokratie und Krise. Zum schwierigen Verhältnis von Theorie und Empirie*. Wiesbaden: Springer VS.
- Meyer, Thomas. 2002. *Media Democracy: How the Media Colonize Politics*. Cambridge: Polity Press.
- Michael, Christoph M. 2021. *Migration and the Crisis of Democracy in Contemporary Europe*. London: Palgrave Macmillan.
- Miller, David. 2020. "Reconceiving the Democratic Boundary Problem." *Philosophy Compass* 15 (11): 1–9. <https://doi.org/10.1111/phc3.12707>.
- Miller, Michael K. 2021. "A Republic, If You Can Keep It: Breakdown and Erosion in Modern Democracies." *The Journal of Politics* 83 (1): 198–213. <https://doi.org/10.1086/709146>.
- Mossaad, Nadwa, Jeremy Ferwerda, Duncan Lawrence, Jeremy M. Weinstein, and Jens Hainmueller. 2018. "Determinants of Refugee Naturalization in the United States." *Proceedings of the National Academy of Sciences* 115 (37): 9175–80. <https://doi.org/10.1073/pnas.1802711115>.
- Murray, Laura M. 1994. "Einwanderungsland Bundesrepublik Deutschland? Explaining the Evolving Positions of German Political Parties on Citizenship Policy." *German Politics & Society* 33: 23–56.

- Orgad, Liav. 2019. "The Citizen-makers: Ethical Dilemmas in Immigrant Integration." *European Law Journal* 25 (6): 524–43.  
<https://doi.org/10.1111/eulj.12338>.
- Owen, David. 2012. "Constituting the Polity, Constituting the Demos: On the Place of the All Affected Interests Principle in Democratic Theory and in Resolving the Democratic Boundary Problem." *Ethics & Global Politics* 5 (3): 129–52.  
<https://doi.org/10.3402/egp.v5i3.18617>.
- Paparusso, Angela, and Catherine Wihtol de Wenden. 2025. "The Shifting of Traditional Understanding of Citizenship Due to International Migration." *Frontiers in Sociology* 10 (May). <https://doi.org/10.3389/fsoc.2025.1568332>.
- Pedroza, Luicy. 2015. "The Democratic Potential of Enfranchising Resident Migrants." *International Migration* 53 (3): 22–35.  
<https://doi.org/10.1111/imig.12162>.
- Persily, Nathaniel, and Joshua A. Tucker, eds. 2020. *Social Media and Democracy. The State of the Field, Prospects for Reform*. Cambridge/New York: Cambridge University Press.
- Peters, Floris, and Maarten Vink. 2024. "Heterogeneous Naturalization Effects of Dual Citizenship Reform in Migrant Destinations: Quasi-Experimental Evidence from Europe." *American Political Science Review* 118 (3): 1541–48.  
<https://doi.org/10.1017/S0003055423001193>.
- Peters, Floris, Maarten Vink, and Hans Schmeets. 2016. "The Ecology of Immigrant Naturalisation: A Life Course Approach in the Context of Institutional Conditions." *Journal of Ethnic and Migration Studies* 42 (3): 359–81.  
<https://doi.org/10.1080/1369183X.2015.1103173>.
- Pierce, Jonathan J., Holly L. Peterson, and Katherine C. Hicks. 2020. "Policy Change: An Advocacy Coalition Framework Perspective." *Policy Studies Journal* 48 (1): 64–86. <https://doi.org/10.1111/psj.12223>.
- Pippenger, Nathan. 2024. *From Openness to Inclusion: Toward a Democratic Approach to Migration Policy*. Cambridge, UK: Cambridge University Pres.

- Preuss, Ulrich K. 1998. "Migration — A Challenge to Modern Citizenship." *Constellations* 4 (3): 307–19. <https://doi.org/10.1111/1467-8675.00057>.
- Rau, Eli G., and Susan Stokes. 2025. "Income Inequality and the Erosion of Democracy in the Twenty-First Century." *Proceedings of the National Academy of Sciences* 122 (1). <https://doi.org/10.1073/pnas.2422543121>.
- Ripoll Servent, Ariadna, and Florian Trauner. 2014. "Do Supranational EU Institutions Make a Difference? EU Asylum Law before and after 'Communitarization.'" *Journal of European Public Policy* 21 (8): 1142–62. <https://doi.org/10.1080/13501763.2014.906905>.
- Robinson, W. S. 1950. "Ecological Correlations and the Behavior of Individuals." *American Sociological Review* 15 (3): 351. <https://doi.org/10.2307/2087176>.
- Rosen, Johannes von. 2019. "The Securitization of Migration as a Threat to Liberal, Democratic Societies." *Sicherheit & Frieden* 37 (1): 35–40. <https://doi.org/10.5771/0175-274X-2019-1-35>.
- Rother, Stefan, ed. 2016. *Migration und Demokratie*. Wiesbaden: Springer VS.
- Rüb, Friedbert W., Veith Selk, and Rieke Trimçev, eds. 2020. *Die Erosion der Demokratie. Beiträge von Michael Th. Greven zur kritischen Demokratietheorie*. Wiesbaden: Springer VS.
- Rubio-Marín, Ruth. 2006. "Transnational Politics and the Democratic Nation-State: Normative Challenges of Expatriate Voting and Nationality Retention of Emigrants." *New York University Law Review* 81 (1): 117–47.
- Sabatier, Paul A. 1987. "Knowledge, Policy-Oriented Learning, and Policy Change." *Knowledge* 8 (4): 649–92. <https://doi.org/10.1177/0164025987008004005>.
- . 1993. "Policy Change over a Decade or More." In *Policy Change and Learning: An Advocacy Coalition Approach*, edited by Paul A. Sabatier and Hank C. Jenkins-Smith, 13–93. Boulder, Co: Westview Press.
- . 1998. "The Advocacy Coalition Framework: Revisions and Relevance for Europe." *Journal of European Public Policy* 5 (1): 98–130. <https://doi.org/10.1080/13501768880000051>.

- San-Akca, Belgin. 2014. "Democracy and Vulnerability." *Journal of Conflict Resolution* 58 (7): 1285–1310. <https://doi.org/10.1177/0022002713498698>.
- Scherz, Antoinette. 2013. "The Legitimacy of the Demos: Who Should Be Included in the Demos and on What Grounds?" *Living Reviews in Democracy* 4. <https://doi.org/10.5167/uzh-91127>.
- Schneider, Gerald, and Christina Isabel Zuber. 2025. "Subnational Principals and Turkish Passports: Administrative Inequality in German Citizenship Policy." *Journal of Ethnic and Migration Studies*, September, 1–30. <https://doi.org/10.1080/1369183X.2025.2550130>.
- Sejersen, Tanja Brøndsted. 2008. "‘I Vow to Thee My Countries’ - The Expansion of Dual Citizenship in the 21st Century." *International Migration Review* 42 (3): 523–49. <https://doi.org/10.1111/j.1747-7379.2008.00136.x>.
- Shachar, Ayelet. 2003. "Children of a Lesser State: Sustaining Global Inequality Through Citizenship Laws. Jean Monnet Working Paper 2/03." New York.
- Shapiro, Ian. 2003. *The State of Democratic Theory*. Princeton/Oxford: Princeton University Press.
- Shin, Geiguen. 2019. "Advocacy Coalition Framework and the US Immigration Policy." In *Global Encyclopedia of Public Administration, Public Policy, and Governance*, edited by Ali Farazmand, 1–7. Cham: Springer International Publishing. [https://doi.org/10.1007/978-3-319-31816-5\\_3647-1](https://doi.org/10.1007/978-3-319-31816-5_3647-1).
- Solano, Giacomo, and Thomas Huddleston. 2020. "Migrant Integration Policy Index 2020." Brussels/Barcelona. <https://www.mipex.eu/>.
- Solimano, Andrés. 2010. *International Migration in the Age of Crisis and Globalization*. Cambridge, UK: Cambridge University Press. <https://doi.org/10.1017/CBO9780511761690>.
- Song, Sarah. 2012. "The Boundary Problem in Democratic Theory: Why the Demos Should Be Bounded by the State." *International Theory* 4 (1): 39–68. <https://doi.org/10.1017/S1752971911000248>.

- . 2016. “The Significance of Territorial Presence and the Rights of Immigrants.” In *Migration in Political Theory. The Ethics of Movement and Membership*, edited by Sarah Fine and Lea Ypi, 225–48. Oxford, UK: Oxford University Press.
- Soysal, Y. N. I. 1994. *Limits of Citizenship: Migrants and Postnational Membership in Europe*. Chicago: University of Chicago Press.
- Spiro, Peter J. 2011. “A New International Law of Citizenship.” *The American Journal of International Law* 105 (4): 694–746.
- Tormey, Simon. 2022. “Stresses and Strains: Will We Ever Agree on What’s Going Wrong with Democracy?” *Representation* 58 (1): 13–26.  
<https://doi.org/10.1080/00344893.2021.2005674>.
- Umpierrez de Reguero, Sebastian, and Maarten Vink. 2025. “Pathways to External Citizenship: The Global Extension of Dual Citizenship and Voting from Abroad.” *Journal of Ethnic and Migration Studies*, September, 1–25.  
<https://doi.org/10.1080/1369183X.2025.2550124>.
- Venema, Mathias, and Claus Grimm. 2002. *Situation der ausländischen Arbeitnehmer und ihrer Familienangehörigen in der Bundesrepublik Deutschland. Repräsentativuntersuchung 2001. Teil A: Türkische, ehemalige Jugoslawische, italienische, sowie griechische Arbeitnehmer und ihre Familienangehörigen*. Offenbach/München: BMAS.
- Vink, Maarten, Luuk van der Baaren, Rainer Bauböck, Jelena Džankić, Iseult Honohan, and Bronwen Manby. 2023. “GLOBALCIT Citizenship Law Dataset, v2.0, Country-Year-Mode Data ([Acquisition]/[Loss]).” Florence.  
<https://hdl.handle.net/1814/73190>.
- Vink, Maarten, Gerard-René de Groot, and Ngo Chun Luk. 2015. “MACIMIDE Global Expatriate Dual Citizenship Dataset. Harvard Dataverse, V5 [2020].” Maastricht. <http://dx.doi.org/10.7910/DVN/TTMZ08>.
- Vink, Maarten, Tijana Prokic-Breuer, and Jaap Dronkers. 2013. “Immigrant Naturalization in the Context of Institutional Diversity: Policy Matters, but to Whom?” *International Migration* 51 (5): 1–20.

- Vink, Maarten, Arjan H. Shakel, David Reichel, Ngo Chun Luk, and Gerard-Rene De Groot. 2019. "The International Diffusion of Expatriate Dual Citizenship." *Migration Studies* 7 (3): 362–83. <https://doi.org/10.1093/migration/mnz011>.
- Vink, Maarten, Anna Tegunimataka, Floris Peters, and Pieter Bevelander. 2021. "Long-Term Heterogeneity in Immigrant Naturalization: The Conditional Relevance of Civic Integration and Dual Citizenship." *European Sociological Review* 37 (5): 751–65. <https://doi.org/10.1093/esr/jcaa068>.
- Wachuku, Vanessa Chidi. 2019. *Promoting and Challenging Immigration Detention in Canada: Understanding the Role of Advocacy Coalition Groups in Canada's Immigration Detention Policy Subsystem*. RCIS Working Paper No. 2019/2. Toronto: Ryerson Centre for Immigration & Settlement.
- Weible, Christopher M., and Hank C. Jenkins-Smith. 2016. "The Advocacy Coalition Framework: An Approach for the Comparative Policy Analysis of Contentious Policy Issues." In *Contemporary Approaches to Public Policy. Theories, Controversies and Perspectives*, edited by B. Guy Peters and Philippe Zittoun, 15–34. London: Palgrave Macmillan.
- Weible, Christopher M., Paul A. Sabatier, and Kelly McQueen. 2009. "Themes and Variations: Taking Stock of the Advocacy Coalition Framework." *Policy Studies Journal* 37 (1): 121–40. <https://doi.org/10.1111/j.1541-0072.2008.00299.x>.
- Weimer, David Leo. 2002. "Enriching Public Discourse: Policy Analysis in Representative Democracies." *The Good Society* 11 (1): 61–65. <https://doi.org/10.1353/gso.2002.0020>.
- Weinmann, Martin, Inna Becher, and Christian Babka von Gostomski. 2012. *Einbürgerungsverhalten von Ausländerinnen und Ausländern in Deutschland sowie Erkenntnisse zu Optionspflichtigen. Ergebnisse der BAMF-Einbürgerungsstudie 2011*. Nürnberg: BAMF.
- Wellman, Elizabeth Iams, Nathan W. Allen, and Benjamin Nyblade. 2023. "The Extraterritorial Voting Rights and Restrictions Dataset (1950–2020)." *Comparative Political Studies* 56 (6): 897–929. <https://doi.org/10.1177/00104140221115169>.

- Whelan, Frederick G. 1983. "Prologue: Democratic Theory and the Boundary Problem." *Nomos* 25: 13–47.
- Wihtol de Wenden, Catherine. 2025. "Citizenship and Migration in a Globalized World." In *The Three Challenges of Citizenship. Democracy, Market and Globalization*, edited by Manlio Cinalli and Senyo Dotsey, 161–78. Cham: Palgrave Macmillan.
- Wilkinson, Paul. 2011. *Terrorism Versus Democracy. The Liberal State Response*. Abingdon, Oxon/New York: Routledge.
- Wimmer, Andreas. 2008. "Elementary Strategies of Ethnic Boundary Making." *Ethnic and Racial Studies* 31 (6): 1025–55.  
<https://doi.org/10.1080/01419870801905612>.
- . 2013. *Ethnic Boundary Making*. Oxford, UK: Oxford University Press.  
<https://doi.org/10.1093/acprof:oso/9780199927371.001.0001>.
- Winter, Elke. 2014. "Traditions of Nationhood or Political Conjuncture? - Debating Citizenship in Canada and Germany." *Comparative Migration Studies* 2 (1): 29–55. <https://doi.org/10.5117/CMS2014.1.WINT>.
- Winter, Elke, Annkathrin Diehl, and Anke Patzelt. 2015. "Ethnic Nation No More? Making Sense of Germany's New Stance on Dual Citizenship by Birth." *Review of European and Russian Affairs* 9 (1): 1–18.
- Witte, Nils. 2014. *Legal and Symbolic Membership – Symbolic Boundaries and Naturalization Intentions of Turkish Residents in Germany*. *EUI Working Papers* 100. Florenz: EUI.
- . 2018. *Negotiating the Boundaries of Belonging. The Intricacies of Naturalisation in Germany*. Wiesbaden: Springer VS.
- Yang, Philip Q. 1994. "Explaining Immigrant Naturalization." *International Migration Review* 28 (3): 449–77. <https://doi.org/10.2307/2546816>.
- Zürn, Michael. 1998. *Regieren jenseits des Nationalstaates: Globalisierung und Denationalisierung als Chance*. Frankfurt a.M.: Suhrkamp.

## 7. Appendix I: Presentations of the Dissertation Project and Articles

The research approach as well as interim stages and (partial) results have been presented and discussed in different contexts, as outlined in the table below.

**Table A0.1: Presentations of the dissertation project and articles**

<b>Date</b>	<b>Forum</b>	<b>Details</b>
<b>05.05.2017</b>	Netzwerk Norddeutsche Demokratieforschung (NND), 10. Doktorandenworkshop Demokratieforschung, Leuphana University Lüneburg	Presentation of the research design and the conceptual foundations of the dissertation
<b>21.11.2017</b>	Tuesday Seminar, Center for the Study of Democracy, Leuphana University Lüneburg	Presentation of the research design and preliminary results of Article 2
<b>25.01.2021</b>	Tuesday Seminar, Center for the Study of Democracy, Leuphana University Lüneburg	Presentation of the research design and preliminary results of Article 1
<b>19.02.2024</b>	Doctoral Candidate Workshop of the Federal Institute for Population Research (BiB), Johannes Gutenberg University Mainz	Presentation of the research design, the conceptual foundations and preliminary results of the dissertation
<b>17.04.2024</b>	Master-, Promotions- und Habilitationskolloquium Politikwissenschaft, University of Hildesheim	Presentation of the research design and preliminary results of Article 3
<b>17.06.2025</b>	Research colloquium, Research Area “Migration & Mobility”, Federal Institute for Population Research (BiB), Wiesbaden	Presentation of the research design of the dissertation and the concept for the framework paper

## **8. Appendix II: Appendices of the Articles**

### **8.1 Appendix of Article 1**

**Supplemental materials: Democracy and Dual Citizenship. A Normative Analysis of Citizenship Policies in EU Countries.**

**Table A1.1: Overview of variables**

Internal dual citizenship		External dual citizenship								
Generation	Variable	Way of citizenship acquisition	Research question	Coding	Additional information	Variable	Way of citizenship acquisition	Research question	Coding	Additional information
1st generation	intl	dual citizenship through naturalization	Does the country allow dual citizenship if first generation immigrants acquire the country's citizenship?	0 = no 1 = yes	not allowed if citizenship is acquired allowed if citizenship is acquired	ex1	dual citizenship through naturalization	Does the country allow dual citizenship if first generation emigrants (voluntarily) acquire another citizenship abroad?	0 = no 1 = yes	not allowed if foreign citizenship is acquired allowed if foreign citizenship is acquired
2nd generation	int2	dual citizenship through birthright / naturalization after birth	Does the country allow dual citizenship (before age of majority) for children born in the country to first generation immigrants even if these children acquire another citizenship at birth?	0 = no 1 = yes 2 = yes	not allowed if born in the country allowed if born in the country allowed if born in the country after age of majority	ex2	dual citizenship through birthright	Does the country allow dual citizenship (before age of majority) for children born abroad to first generation emigrants even if these children acquire another citizenship at birth?	0 = no 1 = yes	not allowed if born abroad allowed if born abroad
2nd generation+						ex2+	limitation of dual citizenship	Does the country delimit dual citizenship for children born abroad to citizens (i.e. delimited automatic acquisition if another citizenship is acquired at birth, proof of territorial contact or genuine link)?	0 = no 1 = yes	unlimited dual citizenship if born abroad delimited dual citizenship if born abroad

## Table A1.2: Research results and sources

Variable int1: internal dual citizenship, 1st generation - dual citizenship through naturalization

Country	ISO2	int1		Additional information	Conditions	Further conditions	Procedure	Main sources	Additional sources
Austria	AT	0	no	not allowed if citizenship is acquired	renunciation / automatic loss	6-10 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries, general moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.mipex.eu/austria">https://www.mipex.eu/austria</a> (18.11.2021)
Belgium	BE	1	yes	allowed if citizenship is acquired	n.a.	5 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries, general moral character); [NO economic requirement]	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://diplomatic.belgium.be/en/services/services_abroad/nationality/possessing_several_nationalities">https://diplomatic.belgium.be/en/services/services_abroad/nationality/possessing_several_nationalities</a> (18.11.2021)
Bulgaria	BG	0	no	not allowed if citizenship is acquired	renunciation	5 years residence; language (without certification/test); [NO civic integration requirement]; criminal record (specified crimes, offences, character queries, general moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.foreigner.bg/is-dual-citizenship-allowed-in-bulgaria/">https://www.foreigner.bg/is-dual-citizenship-allowed-in-bulgaria/</a> <a href="https://www.dualcitizenship.com/countries/bulgaria.html">https://www.dualcitizenship.com/countries/bulgaria.html</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/bulgaria/">https://www.dualcitizenshipreport.org/dual-citizenship/bulgaria/</a> (18.11.2021)
Croatia	HR	0	no	not allowed if citizenship is acquired	renunciation / automatic loss	6-10 years residence; language (certification/test); civic integration (without certification/test); criminal record (without specification, good moral character); economic resources	entitlement (application)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/croatia/">https://www.dualcitizenshipreport.org/dual-citizenship/croatia/</a> (18.11.2021)
Cyprus	CY	1	yes	allowed if citizenship is acquired	n.a.	5 years residence; [NO language requirement]; civic integration (without certification/test); criminal record (without specification, good moral character); [NO economic requirement]	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/cyprus/">https://www.dualcitizenshipreport.org/dual-citizenship/cyprus/</a> (18.11.2021)
Czech Republic	CZ	1	yes	allowed if citizenship is acquired	n.a.	5 years residence; language (without certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries, general moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/czech-republic/">https://www.dualcitizenshipreport.org/dual-citizenship/czech-republic/</a> EUDO Country Report (2014) (18.11.2021)
Denmark	DK	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries, general moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/denmark/">https://www.dualcitizenshipreport.org/dual-citizenship/denmark/</a> (18.11.2021)
Estonia	EE	0	no	not allowed if citizenship is acquired	renunciation	6-10 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries, general moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/estonia/">https://www.dualcitizenshipreport.org/dual-citizenship/estonia/</a> (18.11.2021)
Finland	FI	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries, general moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/finland/">https://www.dualcitizenshipreport.org/dual-citizenship/finland/</a> (18.11.2021)
France	FR	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries, general moral character); [NO economic requirement]	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.mipex.eu/france">https://www.mipex.eu/france</a> (18.11.2021)
Germany	DE	1	yes	allowed if citizenship is acquired	n.a.	3-5 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries); economic resources	entitlement (application)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.bundesregierung.de/breg-de/aktuelles/modernisation-citizenship-law-2254382">https://www.bundesregierung.de/breg-de/aktuelles/modernisation-citizenship-law-2254382</a> <a href="https://www.recht.bund.de/bgb1/1/2024/104/VO.html">https://www.recht.bund.de/bgb1/1/2024/104/VO.html</a> <a href="https://www.bmi.bund.de/SharedDocs/faqs/EN/topics/ministry/taatsangehoerigkeits_reform_en/taatsangehoerigkeits_reform-liste.html">https://www.bmi.bund.de/SharedDocs/faqs/EN/topics/ministry/taatsangehoerigkeits_reform_en/taatsangehoerigkeits_reform-liste.html</a> <a href="https://www.bmi.bund.de/SharedDocs/kurzmeldungen/EN/2024/01/new_nationality_law.html">https://www.bmi.bund.de/SharedDocs/kurzmeldungen/EN/2024/01/new_nationality_law.html</a> <a href="https://canada.diplo.de/ca-en/about-us/vancouver/-/2650490">https://canada.diplo.de/ca-en/about-us/vancouver/-/2650490</a> (11.06.2024)
Greece	GR	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; language (without certification/test); civic integration (without certification/test); criminal record (specified crimes, offences, character queries); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources">https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources</a> (18.11.2021)
Hungary	HU	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; general assimilation (without certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries, general moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources">https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources</a> (18.11.2021)
Ireland	IE	1	yes	allowed if citizenship is acquired	n.a.	5 years residence; [NO language requirement]; [NO civic integration requirement]; criminal record (without specification, good moral character); [NO economic requirement]	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources">https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources</a> (18.11.2021)

– CONTINUED –

Table A1.2: Research results and sources – V int1

– CONTINUED –

Country	ISO2	int1		Additional information	Conditions	Further conditions	Procedure	Main sources	Additional sources
Italy	IT	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; language (certification/test); [NO civic integration requirement]; criminal record (specified crimes, offences, character queries); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources">https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources</a> (18.11.2021)
Latvia	LV	0	no	not allowed if citizenship is acquired	renunciation / automatic loss	5 years residence; language (without certification/test); civic integration (without certification/test); [NO criminal record requirement]; economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/latvia/">https://www.dualcitizenshipreport.org/dual-citizenship/latvia/</a> (18.11.2021)
Lithuania	LT	0	no	not allowed if citizenship is acquired	renunciation / automatic loss	6-10 years residence; language (without certification/test); civic integration (without certification/test); criminal record (specified crimes, offences, character queries); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/lithuania/">https://www.dualcitizenshipreport.org/dual-citizenship/lithuania/</a> (18.11.2021)
Luxembourg	LU	1	yes	allowed if citizenship is acquired	n.a.	5 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries); [NO economic requirement]	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.mipex.eu/luxembourg">https://www.mipex.eu/luxembourg</a> (18.11.2021)
Malta	MT	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; language (without certification/test); [NO civic integration requirement]; criminal record (without specification, good moral character); [NO economic requirement]	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/malta/">https://www.dualcitizenshipreport.org/dual-citizenship/malta/</a> EUDO Country Report (2015) (18.11.2021)
Netherlands	NL	0	no	not allowed if citizenship is acquired	renunciation / automatic loss	5 years residence; language (certification/test); civic integration (certification/test); criminal record (specified crimes, offences, character queries); [NO economic requirement]	entitlement (application)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.mipex.eu/netherlands">https://www.mipex.eu/netherlands</a> (18.11.2021)
Poland	PL	1	yes	allowed if citizenship is acquired	n.a.	<5 years residence; language (certification/test); [NO civic integration requirement]; criminal record (specified crimes, offences, character queries); economic resources	entitlement (application)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources">https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/poland/">https://www.dualcitizenshipreport.org/dual-citizenship/poland/</a> <a href="https://www.dualcitizenship.com/frec-consultation/poland.html">https://www.dualcitizenship.com/frec-consultation/poland.html</a> (18.11.2021)
Portugal	PT	1	yes	allowed if citizenship is acquired	n.a.	5 years residence; language (without certification/test); civic integration (without certification/test); criminal record (specified crimes, offences, character queries); [NO economic requirement]	entitlement (application)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources">https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources</a> (18.11.2021)
Romania	RO	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; language (without certification/test); civic integration (without certification/test); criminal record (without specification, good moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/romania/">https://www.dualcitizenshipreport.org/dual-citizenship/romania/</a> (18.11.2021)
Slovakia	SK	1	yes	allowed if citizenship is acquired	n.a.	6-10 years residence; language (without certification/test); [NO civic integration requirement]; criminal record (specified crimes, offences, character queries, general moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/slovakia/">https://www.dualcitizenshipreport.org/dual-citizenship/slovakia/</a> (18.11.2021)
Slovenia	SI	0	no	not allowed if citizenship is acquired	renunciation	6-10 years residence; general assimilation (without specification); [NO civic integration requirement]; criminal record (without specification, good moral character); economic resources	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.mipex.eu/slovenia">https://www.mipex.eu/slovenia</a> <a href="https://www.gov.si/en/topics/citizenship/">https://www.gov.si/en/topics/citizenship/</a> (18.11.2021)
Spain	ES	0	no	not allowed if citizenship is acquired	oath of renunciation, no proof/no consequences	6-10 years residence; language (certification/test); civic integration (certification/test); criminal record (without specification, good moral character); [NO economic requirement]	entitlement (application)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.mipex.eu/spain">https://www.mipex.eu/spain</a> (18.11.2021)
Sweden	SE	1	yes	allowed if citizenship is acquired	n.a.	5 years residence; [NO language requirement]; [NO civic integration requirement]; criminal record (without specification, good moral character); [NO economic requirement]	discretionary (grant)	GLOBALCIT CLD (A06, A06b; 2022)	<a href="https://www.migrationsverket.se/English/Private-individuals/Becoming-a-Swedish-citizen/What-does-Swedish-citizenship-mean.html">https://www.migrationsverket.se/English/Private-individuals/Becoming-a-Swedish-citizen/What-does-Swedish-citizenship-mean.html</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/sweden/">https://www.dualcitizenshipreport.org/dual-citizenship/sweden/</a> (18.11.2021)

Variable int2: internal dual citizenship, 2<sup>nd</sup> generation - dual citizenship through birthright / facilitated naturalization

Country	ISO2	int2		Additional information	Generation	Conditions	Further information	Procedure	Main sources	Additional sources
Austria	AT	0	no	not allowed if born in the country	n.a.	n.a.	no dual citizenship through birth in country or facilitated naturalization before age of majority; restriction for children of binational parents born out of wedlock to foreign mother and Austrian father; recognition of paternity within 8 weeks after birth	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.mipex.eu/austria">https://www.mipex.eu/austria</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/austria/">https://www.dualcitizenshipreport.org/dual-citizenship/austria/</a> (18.11.2021)
Belgium	BE	1	yes	allowed if born in the country	2nd / 3rd	application + facilitated naturalization after birth (< age of 12, parental residence restriction) / double ius soli	dual citizenship: conditional upon application + facilitated naturalization before age of majority	entitlement (application) / automatic (attribution)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/belgium/">https://www.dualcitizenshipreport.org/dual-citizenship/belgium/</a> (18.11.2021)
Bulgaria	BG	0	no	not allowed if born in the country	n.a.	n.a.	no dual citizenship through birth in country or facilitated naturalization before age of majority	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/bulgaria/">https://www.dualcitizenshipreport.org/dual-citizenship/bulgaria/</a> (18.11.2021)
Croatia	HR	0	no	not allowed if born in the country	n.a.	n.a.	no dual citizenship through birth in country or facilitated naturalization before age of majority	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources">https://www.migrationdataportal.org/themes/citoyennete-et-migration#data-sources</a> (18.11.2021)

– CONTINUED –

Table A1.2: Research results and sources – V int2

– CONTINUED –

Country	ISO2	int2	Additional information	Generation	Conditions	Further information	Procedure	Main sources	Additional sources	
Cyprus	CY	2	yes	allowed if born in the country after age of majority	1st	2nd generation must apply for regular naturalization under the same conditions as the 1st generation (no facilitated procedure)	no dual citizenship through birth in country or facilitated naturalization before age of majority, 2nd generation must apply for regular naturalization under the same conditions as the 1st generation	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.mipex.eu/cyprus">https://www.mipex.eu/cyprus</a> (18.11.2021)
Czech Republic	CZ	1	yes	allowed if born in the country	1.5th / 2nd	facilitated naturalisation for person with certain period of residence after age of majority, residence requirement + further requirements / special procedure for person born in Czech Republic before age of majority, but no facilitated naturalisation, numerous requirements (permanent residence + further requirements)	dual citizenship before age of majority: naturalisation after birth (not facilitated)	entitlement (application) / discretionary (grant)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.mipex.eu/czech-republic">https://www.mipex.eu/czech-republic</a> (18.11.2021)
Denmark	DK	2	yes	allowed if born in the country after age of majority	1.5th / 2nd	facilitated naturalization for person with certain period of residence after age of majority, residence requirement + further requirements	dual citizenship: facilitated naturalization after age of majority	discretionary (grant)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.mipex.eu/denmark">https://www.mipex.eu/denmark</a> <a href="https://www.refworld.org/pdfid/5fe138154.pdf">https://www.refworld.org/pdfid/5fe138154.pdf</a> (18.11.2021)
Estonia	EE	0	no	not allowed if born in the country	n.a.	n.a.	no dual citizenship through birth in country or facilitated naturalization before age of majority	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.migrationdataportal.org/themes/citoyennete-et-migration/data-sources">https://www.migrationdataportal.org/themes/citoyennete-et-migration/data-sources</a> (18.11.2021)
Finland	FI	2	yes	allowed if born in the country after age of majority	1.5th / 2nd	facilitated naturalization for person with certain period of residence after age of majority, residence requirement / facilitated naturalization after age of majority (< age of 23)	dual citizenship: facilitated naturalization after age of majority	entitlement (application) / entitlement (application)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.mipex.eu/finland">https://www.mipex.eu/finland</a> (18.11.2021)
France	FR	1	yes	allowed if born in the country	1.5th / 2nd / 3rd	facilitated naturalization for person with certain period of residence before age of majority if schooled in France (5 years education) / automatic attribution after birth (residence for 5 years since age of 11) / double ius soli	dual citizenship: automatic attribution / declaration after birth (conditional)	entitlement (application) / automatic (attribution) / automatic (attribution)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.mipex.eu/france">https://www.mipex.eu/france</a> (18.11.2021)
Germany	DE	1	yes	allowed if born in the country	2nd	ius soli	dual citizenship: conditional ius soli	automatic (attribution)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.bundesregierung.de/breg-de/aktuelles/modernisation-citizenship-law-2254382">https://www.bundesregierung.de/breg-de/aktuelles/modernisation-citizenship-law-2254382</a> <a href="https://www.recht.bund.de/bgh/1/2024/104/V0.html">https://www.recht.bund.de/bgh/1/2024/104/V0.html</a> <a href="https://www.bmi.bund.de/SharedDocs/faqs/EN/topics/ministry/staatsangehoerigkeit_s_reform_en/staatsangehoerigkeit-reform-liste.html">https://www.bmi.bund.de/SharedDocs/faqs/EN/topics/ministry/staatsangehoerigkeit_s_reform_en/staatsangehoerigkeit-reform-liste.html</a> (11.06.2024)
Greece	GR	1	yes	allowed if born in the country	1.5th / 2nd / 3rd	facilitated naturalization for person with certain period of residence before age of majority if schooled in Greece (9 / 6 years of primary secondary / secondary education) / facilitated naturalization (conditional) / double ius soli	dual citizenship: facilitated naturalization before age of majority	entitlement (application) / entitlement (application) / automatic (attribution)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://file.loc.gov/storage-services/service/ll/llgr/d/2018299336/2018299336.pdf">https://file.loc.gov/storage-services/service/ll/llgr/d/2018299336/2018299336.pdf</a> <a href="https://data.globalcit.eu/NationalDB/docs/GRE%20Citizenship%20Code%20(as%200f%202010,%20English)_1.pdf">https://data.globalcit.eu/NationalDB/docs/GRE%20Citizenship%20Code%20(as%200f%202010,%20English)_1.pdf</a> EURO Country Report (2013) (18.11.2021)
Hungary	HU	1	yes	allowed if born in the country	1.5th / 2nd	special procedure for person with certain period of residence, but no facilitated naturalization, numerous requirements (residence, criminal record, citizenship test + further requirements) / special procedure for person born in Hungary, but no facilitated naturalization, numerous requirements (residence, criminal record, citizenship test + further requirements)	dual citizenship: naturalization (not facilitated)	discretionary (grant) / discretionary (grant)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://home-affairs.ec.europa.eu/system/files/2020-01/13_hungary_citizenship_study_en.pdf">https://home-affairs.ec.europa.eu/system/files/2020-01/13_hungary_citizenship_study_en.pdf</a> EURO Country Report (2013) (18.11.2021)
Ireland	IE	1	yes	allowed if born in the country	2nd	ius soli + facilitated naturalization after birth	dual citizenship: conditional ius soli + facilitated naturalization before age of majority	automatic (attribution), discretionary (grant)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.citizensinformation.ie/en/moving_country/irish_citizenship/your_right_to_irish_citizenship.html#b5530">https://www.citizensinformation.ie/en/moving_country/irish_citizenship/your_right_to_irish_citizenship.html#b5530</a> EURO Country Report (2012) (19.11.2021)
Italy	IT	2	yes	allowed if born in the country after age of majority	2nd	facilitated naturalization after age of majority (< age of 23)	dual citizenship: facilitated naturalization after age of majority	entitlement (application)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/italy/">https://www.dualcitizenshipreport.org/dual-citizenship/italy/</a> EURO Country Report (2013) (19.11.2021)
Latvia	LV	0	no	not allowed if born in the country	n.a.	n.a.	no dual citizenship through birth in country or facilitated naturalization before age of majority (+ withdrawal if person obtained another citizenship before reaching the age of majority and wishes to retain that citizenship: application for renunciation of Latvian citizenship after age of majority (before age of 25)	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.pmlp.gov.lv/en/dual-citizenship">https://www.pmlp.gov.lv/en/dual-citizenship</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/latvia">https://www.dualcitizenshipreport.org/dual-citizenship/latvia</a> (19.11.2021)

– CONTINUED –

Table A1.2: Research results and sources – V int2

– CONTINUED –

Country	ISO2	int2	Additional information	Generation	Conditions	Further information	Procedure	Main sources	Additional sources
Lithuania	LT	0 no	not allowed if born in the country	n.a.	n.a.	no dual citizenship through birth in country or facilitated naturalization before age of majority (+ withdrawal if person acquired citizenship of Lithuania and of another state by birth and has not, upon reaching the age of 21 years, renounced citizenship of the other state)	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/lithuania/">https://www.dualcitizenshipreport.org/dual-citizenship/lithuania/</a> (19.11.2021)
Luxembourg	LU	1 yes	allowed if born in the country	1.5th / 2nd	facilitated naturalization for person with certain period of residence before age of majority if schooled in Luxembourg (7 years education) / facilitated naturalization after birth (declaration at age of 12 + residence restrictions -> person + parents) + automatic attribution after age of majority (residence restrictions -> person + parents)	dual citizenship: facilitated naturalization before age of majority	entitlement (application) / entitlement (application) / automatic (attribution)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://ec.europa.eu/migrant-integration/library-document/luxembourg-nouvelle-loi-sur-la-nationalite_en">https://ec.europa.eu/migrant-integration/library-document/luxembourg-nouvelle-loi-sur-la-nationalite_en</a> <a href="https://globalcit.eu/new-luxembourg-nationality-law-came-into-force-on-april-1/">https://globalcit.eu/new-luxembourg-nationality-law-came-into-force-on-april-1/</a> <a href="https://guichet.public.lu/en/citoyens/citoyennete/nationalite-luxembourgeoise/possession-automatique/effet-loi.html">https://guichet.public.lu/en/citoyens/citoyennete/nationalite-luxembourgeoise/possession-automatique/effet-loi.html</a> (22.11.2021)
Malta	MT	2 yes	allowed if born in the country after age of majority	1st	2nd generation must apply for regular naturalization under the same conditions as the 1st generation (no facilitated procedure)	no dual citizenship through birth in country or facilitated naturalization before age of majority, 2nd generation must apply for regular naturalization under the same conditions as the 1st generation	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.legal-malta.com/articles/malta-citizenship-by-birth">https://www.legal-malta.com/articles/malta-citizenship-by-birth</a> EUDO Country Report (2015) (22.11.2021)
Netherlands	NL	1 yes	allowed if born in the country	1.5th / 2nd / 3rd	facilitated naturalization for person with certain period of residence after age of majority, residence requirement / facilitated naturalization after age of majority / double ius soli	dual citizenship: facilitated naturalization after age of majority	entitlement (application) / entitlement (application) / automatic (attribution)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://ind.nl/en/dutch-citizenship/Pages/Renouncing-another-nationality-when-you-become-Dutch.aspx">https://ind.nl/en/dutch-citizenship/Pages/Renouncing-another-nationality-when-you-become-Dutch.aspx</a> (22.11.2021) <a href="https://www.myn.nl/en/knowledge-base/dual-citizenship-for-new-dutch-citizens-ways-to-retain-your-current-nationality">https://www.myn.nl/en/knowledge-base/dual-citizenship-for-new-dutch-citizens-ways-to-retain-your-current-nationality</a> <a href="https://ind.nl/en/renouncing-your-nationality#exceptions-when-you-do-not-have-to-renounce-your-nationality">https://ind.nl/en/renouncing-your-nationality#exceptions-when-you-do-not-have-to-renounce-your-nationality</a> (26.01.2023)
Poland	PL	2 yes	allowed if born in the country after age of majority	1st	2nd generation must apply for regular naturalization under the same conditions as the 1st generation (no facilitated procedure)	no dual citizenship through birth in country or facilitated naturalization before age of majority, 2nd generation must apply for regular naturalization under the same conditions as the 1st generation; restriction for children of binational parents: establishment of paternity/maternity must occur within one year after birth	n.a.	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://archiwum.mswia.gov.pl/en/document/ways-of-acquiring-polish-ways-of-acquiring-polish-citizenship.html">https://archiwum.mswia.gov.pl/en/document/ways-of-acquiring-polish-ways-of-acquiring-polish-citizenship.html</a> (22.11.2021)
Portugal	PT	1 yes	allowed if born in the country	2nd / 3rd	conditional ius soli + facilitated naturalization after birth (minor, parental residence restriction + other conditions) + facilitated naturalization for person with certain period of residence if born in Portugal before age of majority if schooled in Portugal (completed primary / secondary school) / double ius soli	dual citizenship: conditional ius soli + facilitated naturalization before age of majority	automatic (attribution), entitlement (application) / automatic (attribution)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/portugal/">https://www.dualcitizenshipreport.org/dual-citizenship/portugal/</a> (22.11.2021)
Romania	RO	2 yes	allowed if born in the country after age of majority	2nd	special procedure for person born in and resident in Romania after age of majority, but no facilitated naturalization, numerous requirements (residence, criminal record, civic integration + further requirements)	dual citizenship: naturalization after age of majority (not facilitated)	discretionary (grant)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/romania/">https://www.dualcitizenshipreport.org/dual-citizenship/romania/</a> (22.11.2021)
Slovakia	SK	1 yes	allowed if born in the country	1.5th / 2nd	facilitated naturalization for person with certain period of residence after age of majority / facilitated naturalization before age of majority (residence restriction)	dual citizenship: facilitated naturalization before age of majority	discretionary (grant) / discretionary (grant)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.mic.ion.sk/en/citizenship/conditions-for-granting-slovak-citizenship-naturalization.html">https://www.mic.ion.sk/en/citizenship/conditions-for-granting-slovak-citizenship-naturalization.html</a> (22.11.2021)
Slovenia	SI	2 yes	allowed if born in the country after age of majority	1.5th / 2nd	special procedure for person with certain period of residence after age of majority, residence requirement + further requirements / special procedure for person born in Slovenia after age of majority, but no facilitated naturalization, numerous requirements (residence, criminal record + further requirements)	dual citizenship: naturalization after age of majority (not facilitated)	discretionary (grant) / discretionary (grant)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.gov.si/en/topics/citizenship/">https://www.gov.si/en/topics/citizenship/</a> EUDO Country Report (2013) (22.11.2021)
Spain	ES	0 no	not allowed if born in the country	2nd / 3rd	facilitated naturalization after birth (minor or adult, residence restriction), but dual citizenship only in exceptional cases / double ius soli	no dual citizenship through birth in country or facilitated naturalization before age of majority	entitlement (application) / automatic (attribution)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/spain/">https://www.dualcitizenshipreport.org/dual-citizenship/spain/</a> (22.11.2021)
Sweden	SE	1 yes	allowed if born in the country	1.5th	facilitated naturalization for person with certain period of residence before age of majority, residence requirement	dual citizenship: facilitated naturalization before age of majority	entitlement (application)	GLOBALCIT CLD (A02a, A02b, A04, A05, A07, L06; 2022)	<a href="https://www.bph.de/gesellschaf/migration/laenderprofil/en/english-version-country-profiles/58636/citizenship">https://www.bph.de/gesellschaf/migration/laenderprofil/en/english-version-country-profiles/58636/citizenship</a> EUDO Country Report (2012) (22.11.2021)

Variable ex1: external dual citizenship, 1st generation – dual citizenship through naturalization

Country	ISO2	ex1		Additional information	Conditions	Further information	Procedure	Main sources	Additional sources
Austria	AT	0	no	not allowed if foreign citizenship is acquired	loss: voluntary acquisition of another citizenship	exceptions (e.g. interest of Austria, agreement of other country, clean criminal record+ other conditions)	loss (lapse)	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.oesterreich.gv.at/en/themen/leben_in_oesterreich/staatsbuergerschaft/Seite.260430.html#austrians">https://www.oesterreich.gv.at/en/themen/leben_in_oesterreich/staatsbuergerschaft/Seite.260430.html#austrians</a> <a href="https://www.oesterreich.gv.at/themen/leben_in_oesterreich/staatsbuergerschaft/Seite.260430.html#%C3%96sterreicher">https://www.oesterreich.gv.at/themen/leben_in_oesterreich/staatsbuergerschaft/Seite.260430.html#%C3%96sterreicher</a> <a href="https://www.bmeia.gv.at/reise-services/leben-im-ausland/staats-und-unionsbuergerschaft/doppelstaatsbuergerschaft/">https://www.bmeia.gv.at/reise-services/leben-im-ausland/staats-und-unionsbuergerschaft/doppelstaatsbuergerschaft/</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/austria/">https://www.dualcitizenshipreport.org/dual-citizenship/austria/</a> EUDO Country Report (2013) (30.11.2021)
Belgium	BE	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://diplomatic.belgium.be/en/services/services_abroad/nationality/possessing_several_nationalities">https://diplomatic.belgium.be/en/services/services_abroad/nationality/possessing_several_nationalities</a> <a href="https://justitie.belgium.be/en/themes_and_files/children_and_youth/citizenship/dual_citizenship/adult">https://justitie.belgium.be/en/themes_and_files/children_and_youth/citizenship/dual_citizenship/adult</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/belgium/">https://www.dualcitizenshipreport.org/dual-citizenship/belgium/</a> (30.11.2021)
Bulgaria	BG	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/bulgaria/">https://www.dualcitizenshipreport.org/dual-citizenship/bulgaria/</a> <a href="https://visaforbulgaria.com/bulgarian-citizenship#dual-citizenship">https://visaforbulgaria.com/bulgarian-citizenship#dual-citizenship</a> (30.11.2021)
Croatia	HR	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/croatia/">https://www.dualcitizenshipreport.org/dual-citizenship/croatia/</a> EUDO Country Report (2013) (30.11.2021)
Cyprus	CY	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/cyprus/">https://www.dualcitizenshipreport.org/dual-citizenship/cyprus/</a> <a href="https://hrvatizvanrh.gov.hr/useful-information/croatian-citizenship/2520">https://hrvatizvanrh.gov.hr/useful-information/croatian-citizenship/2520</a> <a href="https://www.odvjetnik-strniscak.hr/en/strucni-clanci/how-to-get-dual-citizenship-in-croatia/">https://www.odvjetnik-strniscak.hr/en/strucni-clanci/how-to-get-dual-citizenship-in-croatia/</a> (30.11.2021)
Czech Republic	CZ	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/czech-republic/">https://www.dualcitizenshipreport.org/dual-citizenship/czech-republic/</a> (30.11.2021)
Denmark	DK	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/denmark/">https://www.dualcitizenshipreport.org/dual-citizenship/denmark/</a> (30.11.2021)
Estonia	EE	0	no	not allowed if foreign citizenship is acquired	loss: voluntary acquisition of another citizenship	exceptions (e.g. international protection + other conditions)	loss (lapse)	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/estonia/">https://www.dualcitizenshipreport.org/dual-citizenship/estonia/</a> <a href="https://news.err.ee/874367/do-they-really-have-to-choose-estonian-citizenship-explained-in-detail">https://news.err.ee/874367/do-they-really-have-to-choose-estonian-citizenship-explained-in-detail</a> EUDO Country Report (2013) (30.11.2021)
Finland	FI	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/finland/">https://www.dualcitizenshipreport.org/dual-citizenship/finland/</a> (30.11.2021)
France	FR	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/france/">https://www.dualcitizenshipreport.org/dual-citizenship/france/</a> (30.11.2021)
Germany	DE	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.bundesregierung.de/breg-de/aktuelles/modernisation-citizenship-law-2254382">https://www.bundesregierung.de/breg-de/aktuelles/modernisation-citizenship-law-2254382</a> <a href="https://www.recht.bund.de/bgbl/1/2024/104/VO.html">https://www.recht.bund.de/bgbl/1/2024/104/VO.html</a> <a href="https://www.bmi.bund.de/SharedDocs/faq/EN/topics/ministry/staatsangehoerigkeits_reform_en/staatsangehoerigkeits_reform-liste.html">https://www.bmi.bund.de/SharedDocs/faq/EN/topics/ministry/staatsangehoerigkeits_reform_en/staatsangehoerigkeits_reform-liste.html</a> <a href="https://www.bmi.bund.de/SharedDocs/kurzmeldungen/EN/2024/01/new_nationality_law.html">https://www.bmi.bund.de/SharedDocs/kurzmeldungen/EN/2024/01/new_nationality_law.html</a> <a href="https://canada.diplo.de/ca-en/about-us/vancouver/-/2650490">https://canada.diplo.de/ca-en/about-us/vancouver/-/2650490</a> (11.06.2024)
Greece	GR	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/greece/">https://www.dualcitizenshipreport.org/dual-citizenship/greece/</a> (30.11.2021)

– CONTINUED –

Table A1.2: Research results and sources – V ex1

– CONTINUED –

Country	ISO2	ex1		Additional information	Conditions	Further information	Procedure	Main sources	Additional sources
Hungary	HU	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/hungary/">https://www.dualcitizenshipreport.org/dual-citizenship/hungary/</a> (30.11.2021)
Ireland	IE	1	yes	allowed if foreign citizenship is acquired	loss only for naturalised citizens/citizens otherwise than by birth: voluntary acquisition of another citizenship	loss is the exception (i.e. naturalized citizens)	loss (withdrawal)	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/ireland/">https://www.dualcitizenshipreport.org/dual-citizenship/ireland/</a> (30.11.2021)
Italy	IT	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/italy/">https://www.dualcitizenshipreport.org/dual-citizenship/italy/</a> (30.11.2021)
Latvia	LV	0	no	not allowed if foreign citizenship is acquired	loss: voluntary acquisition of another citizenship	exceptions (e.g. citizens of EU, EFTA or NATO Member States + other exceptions)	loss (withdrawal)	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/latvia/">https://www.dualcitizenshipreport.org/dual-citizenship/latvia/</a> (30.11.2021)
Lithuania	LT	0	no	not allowed if foreign citizenship is acquired	loss: voluntary acquisition of another citizenship	exceptions (e.g. flight or exile before March 11, 1990, acquisition of Lithuanian citizenship while having refugee status in Lithuania + other highly exceptional situations)	loss (lapse)	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/lithuania/">https://www.dualcitizenshipreport.org/dual-citizenship/lithuania/</a> (30.11.2021) <a href="https://www.renkuosilietuva.lt/en/dual-citizenship/">https://www.renkuosilietuva.lt/en/dual-citizenship/</a> <a href="https://www.migration.lt/dual-multiple-citizenship-for-minors-in-lithuania-took-effect">https://www.migration.lt/dual-multiple-citizenship-for-minors-in-lithuania-took-effect</a> (01.12.2022)
Luxembourg	LU	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/luxembourg">https://www.dualcitizenshipreport.org/dual-citizenship/luxembourg</a> (30.11.2021)
Malta	MT	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/malta/">https://www.dualcitizenshipreport.org/dual-citizenship/malta/</a> EUDO Country Report (2015) (30.11.2021)
Netherlands	NL	1	yes	allowed if foreign citizenship is acquired	allowed for 1st gen; loss: voluntary acquisition of another citizenship, BUT provision does not apply if (1) person is born and resides in another country, or (2) resided in another country for 5 years before majority, or (3) is married to a citizen of another country (adults), or (4) his/her parent is citizen of the Netherlands (minors), or (5) acquired citizenship by birth in the Netherlands.	exceptions (e.g. first generation emigrants, i.e. acquisition of Dutch citizenship by birth in the Netherlands + other exceptions)	loss (lapse)	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/netherlands/">https://www.dualcitizenshipreport.org/dual-citizenship/netherlands/</a> (30.11.2021)
Poland	PL	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/poland/">https://www.dualcitizenshipreport.org/dual-citizenship/poland/</a> (30.11.2021)
Portugal	PT	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/portugal/">https://www.dualcitizenshipreport.org/dual-citizenship/portugal/</a> (30.11.2021)
Romania	RO	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/romania/">https://www.dualcitizenshipreport.org/dual-citizenship/romania/</a> (30.11.2021)
Slovakia	SK	1	yes	allowed if foreign citizenship is acquired	loss: voluntary acquisition of another citizenship, but exception if permanent resident (at least 5 years in a country)	exception (allowed since April 1, 2022 if 5 years registered and actual resident in the country of which he/she acquires citizenship)	loss (lapse)	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/slovakia/">https://www.dualcitizenshipreport.org/dual-citizenship/slovakia/</a> <a href="https://www.mic.iom.sk/en/citizenship/loss-of-slovak-citizenship.html">https://www.mic.iom.sk/en/citizenship/loss-of-slovak-citizenship.html</a> <a href="https://www.mic.iom.sk/en/citizenship/loss-of-slovak-citizenship.html">https://www.mic.iom.sk/en/citizenship/loss-of-slovak-citizenship.html</a> <a href="https://www.schengenvisa.info.com/news/slovaks-living-abroad-soon-to-be-able-to-keep-dual-citizenship/">https://www.schengenvisa.info.com/news/slovaks-living-abroad-soon-to-be-able-to-keep-dual-citizenship/</a> <a href="https://www.akmv.sk/en/how-to-keep-slovak-citizenship-after-acquiring-citizenship-of-another-state/">https://www.akmv.sk/en/how-to-keep-slovak-citizenship-after-acquiring-citizenship-of-another-state/</a> (01.12.2022)

– CONTINUED –

Table A1.2: Research results and sources – V ex1

– CONTINUED –

Country	ISO2	ex1		Additional information	Conditions	Further information	Procedure	Main sources	Additional sources
Slovenia	SI	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/slovenia/">https://www.dualcitizenshipreport.org/dual-citizenship/slovenia/</a> (30.11.2021)
Spain	ES	0	no	not allowed if foreign citizenship is acquired	loss: voluntary acquisition of another citizenship	exceptions (e.g. Latin American countries, Andorra, the Philippines, Equatorial Guinea or Portugal)	loss (lapse)	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/spain/">https://www.dualcitizenshipreport.org/dual-citizenship/spain/</a> (30.11.2021)
Sweden	SE	1	yes	allowed if foreign citizenship is acquired	n.a.	n.a.	n.a.	MACIMIDE GEDDD V.5.00; GLOBALCIT CLD (L05; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/sweden/">https://www.dualcitizenshipreport.org/dual-citizenship/sweden/</a> (30.11.2021)

Variable ex2: external dual citizenship, 2nd generation – dual citizenship through birthright

Country	ISO2	ex2		Additional information	Conditions	Further information	Procedure	Main sources	Additional sources
Austria	AT	1	yes	allowed if born abroad	restriction for children of binational parents born out of wedlock to foreign mother and Austrian father: recognition of paternity within 8 weeks after birth	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.oesterreich.gv.at/en/themes/leben_in_oesterreich/staatsbuergerschaft/Seite.260430.html#children">https://www.oesterreich.gv.at/en/themes/leben_in_oesterreich/staatsbuergerschaft/Seite.260430.html#children</a> <a href="https://www.migration.gv.at/en/living-and-working-in-austria/integration-and-citizenship/citizenship/">https://www.migration.gv.at/en/living-and-working-in-austria/integration-and-citizenship/citizenship/</a> EUDO Country Report (2013) (01.12.2021)
Belgium	BE	1	yes	allowed if born abroad	dual citizens born abroad who resided uninterruptedly abroad from the age of 18 until 28; request to remain a citizen (before reaching the age of 28); registration if parent is born abroad	proof of link if resident abroad (after majority); registration only from 3rd generation	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://justitie.belgium.be/en/themes_and_files/children_and_youth/citizenship/dual_citizenship/adult">https://justitie.belgium.be/en/themes_and_files/children_and_youth/citizenship/dual_citizenship/adult</a> <a href="https://diplomatie.belgium.be/en/services/services_abroad/nationality/possessing_several_nationalities">https://diplomatie.belgium.be/en/services/services_abroad/nationality/possessing_several_nationalities</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/belgium/">https://www.dualcitizenshipreport.org/dual-citizenship/belgium/</a> EUDO Country Report (2013) (30.11.2021)
Bulgaria	BG	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://visaforbulgaria.com/bulgaria-n-citizenship">https://visaforbulgaria.com/bulgaria-n-citizenship</a> <a href="https://www.dualcitizenshipreport.org/countries/bulgaria.html">https://www.dualcitizenshipreport.org/countries/bulgaria.html</a> (01.12.2021)
Croatia	HR	1	yes	allowed if born abroad	registration if only one parent is a citizen (before age of 21)	dual citizenship restriction (registration before age of 21)	automatic (attribution); if born abroad to one citizen: discretionary (application)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/croatia/">https://www.dualcitizenshipreport.org/dual-citizenship/croatia/</a> (01.12.2021) EUDO Country Report (2013) <a href="https://mvpp.gov.hr/UserDocsImages/2022/datoteke/Croatian%20Citizenship%20Overview%20Jan%202022.pdf">https://mvpp.gov.hr/UserDocsImages/2022/datoteke/Croatian%20Citizenship%20Overview%20Jan%202022.pdf</a> <a href="https://www.expatincroatia.com/croatian-citizenship-descent/">https://www.expatincroatia.com/croatian-citizenship-descent/</a> (20.12.2022)
Cyprus	CY	1	yes	allowed if born abroad	registration if born abroad and resident abroad / naturalized dual citizens: declaration of interest to remain citizen (annually) if person is permanently resident abroad	restriction for naturalized citizens who reside permanently abroad	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/cyprus/">https://www.dualcitizenshipreport.org/dual-citizenship/cyprus/</a> (01.12.2021)
Czech Republic	CZ	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/czech-republic/">https://www.dualcitizenshipreport.org/dual-citizenship/czech-republic/</a> EUDO Country Report (2014) (01.12.2021)
Denmark	DK	1	yes	allowed if born abroad	dual citizens born abroad who never lived or stayed in Denmark under circumstances indicating a link to the country upon the age of 22; request to remain a citizen (before reaching the age of 22)	proof of link if resident abroad (after majority); note: wedlock restriction before 2014	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/denmark/">https://www.dualcitizenshipreport.org/dual-citizenship/denmark/</a> (01.12.2021) <a href="https://usa.um.dk/en/travel-and-residence/consular-matters/citizenship">https://usa.um.dk/en/travel-and-residence/consular-matters/citizenship</a> (05.01.2023)
Estonia	EE	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/estonia/">https://www.dualcitizenshipreport.org/dual-citizenship/estonia/</a> <a href="https://www.eesti.ee/en/citizenship-and-documents/citizenship/estonian-citizenship">https://www.eesti.ee/en/citizenship-and-documents/citizenship/estonian-citizenship</a> <a href="https://news.err.ee/874367/do-they-really-have-to-choose-estonian-citizenship-explained-in-detail">https://news.err.ee/874367/do-they-really-have-to-choose-estonian-citizenship-explained-in-detail</a> EUDO Country Report (2013) (01.12.2021)
Finland	FI	1	yes	allowed if born abroad	dual citizens born abroad who never lived or stayed in Finland under circumstances indicating a link to the country upon the age of 22; request to remain a citizen (before reaching the age of 22); legitimation or declaration if born out of wedlock and only father is a citizen (automatic acquisition at birth: in wedlock OR out of wedlock if mother is a citizen; acquisition through legitimation or declaration: out of wedlock if father is a citizen)	proof of link if resident abroad (after majority)	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/finland/">https://www.dualcitizenshipreport.org/dual-citizenship/finland/</a> <a href="https://migri.fi/en/retaining-finnish-citizenship-at-the-age-of-22">https://migri.fi/en/retaining-finnish-citizenship-at-the-age-of-22</a> EUDO Country Report (2013) (01.12.2021)

– CONTINUED –

Table A1.2: Research results and sources – V ex2

– CONTINUED –

Country	ISO2	ex2		Additional information	Conditions	Further information	Procedure	Main sources	Additional sources
France	FR	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/france/">https://www.dualcitizenshipreport.org/dual-citizenship/france/</a> <a href="https://www.dualcitizenship.com/fre-e-consultation/france.html">https://www.dualcitizenship.com/fre-e-consultation/france.html</a> (01.12.2021)
Germany	DE	1	yes	allowed if born abroad	registration if parent is born abroad	registration only from 3rd generation	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.bundesregierung.de/breg-de/aktuelles/modernisation-citizenship-law-2254382">https://www.bundesregierung.de/breg-de/aktuelles/modernisation-citizenship-law-2254382</a> <a href="https://www.recht.bund.de/bgb/1/2024/104/VO.html">https://www.recht.bund.de/bgb/1/2024/104/VO.html</a> <a href="https://www.bmi.bund.de/SharedDocs/faqs/EN/topics/ministry/staatsangehoerigkeits_reform_en/staatsangehoerigkeits_reform-liste.html">https://www.bmi.bund.de/SharedDocs/faqs/EN/topics/ministry/staatsangehoerigkeits_reform_en/staatsangehoerigkeits_reform-liste.html</a> <a href="https://www.bmi.bund.de/SharedDocs/kurzmeldungen/EN/2024/01/new_nationality_law.html">https://www.bmi.bund.de/SharedDocs/kurzmeldungen/EN/2024/01/new_nationality_law.html</a> <a href="https://canada.diplo.de/ca-en/about-us/vancouver/-/2650490">https://canada.diplo.de/ca-en/about-us/vancouver/-/2650490</a> (11.06.2024)
Greece	GR	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/greece/">https://www.dualcitizenshipreport.org/dual-citizenship/greece/</a> <a href="https://www.dualcitizenship.com/fre-e-consultation/greece.html">https://www.dualcitizenship.com/fre-e-consultation/greece.html</a> (02.12.2021)
Hungary	HU	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/hungary/">https://www.dualcitizenshipreport.org/dual-citizenship/hungary/</a> (02.12.2021)
Ireland	IE	1	yes	allowed if born abroad	naturalized dual citizens: declaration of interest to remain citizen (annually) if person is permanently resident abroad; registration if parent is born abroad	registration only from 3rd generation; restriction for naturalized citizens who reside permanently abroad	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/ireland/">https://www.dualcitizenshipreport.org/dual-citizenship/ireland/</a> (02.12.2021)
Italy	IT	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/italy/">https://www.dualcitizenshipreport.org/dual-citizenship/italy/</a> (02.12.2021)
Latvia	LV	0	no	not allowed if born abroad	dual citizenship only allowed if born abroad to a citizen when dual citizenship has occurred with countries with which dual citizenship is permitted; registration if only one parent is a citizen	dual citizenship restriction (exceptional countries only); registration if born abroad	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/latvia/">https://www.dualcitizenshipreport.org/dual-citizenship/latvia/</a> <a href="https://www.pmlp.gov.lv/en/dual-citizenship">https://www.pmlp.gov.lv/en/dual-citizenship</a> EUDO Country Report (2015) (02.12.2021) <a href="https://www.pmlp.gov.lv/en/child-born-abroad-if-one-or-both-parents-are-latvian-citizens-time-birth-child?utm_source=https%3A%2F%2Fwww.google.com%2F">https://www.pmlp.gov.lv/en/child-born-abroad-if-one-or-both-parents-are-latvian-citizens-time-birth-child?utm_source=https%3A%2F%2Fwww.google.com%2F</a> (02.12.2022)
Lithuania	LT	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.migration.lt/a-citizenship-of-children">https://www.migration.lt/a-citizenship-of-children</a> <a href="https://medium.com/@Ihor_80324/new-amendment-allows-keeping-dual-citizenship-for-lithuanians-born-abroad-c743fa3c7f65">https://medium.com/@Ihor_80324/new-amendment-allows-keeping-dual-citizenship-for-lithuanians-born-abroad-c743fa3c7f65</a> <a href="https://www.migration.lt/dual-children-citizenship-at-the-age-of-21-they-do-not-need-to-choose-one-of-the-citizenships-anymore">https://www.migration.lt/dual-children-citizenship-at-the-age-of-21-they-do-not-need-to-choose-one-of-the-citizenships-anymore</a> (02.12.2021) <a href="https://www.renkuosilietuva.lt/en/dual-citizenship/">https://www.renkuosilietuva.lt/en/dual-citizenship/</a> <a href="https://www.migration.lt/dual-multiple-citizenship-for-minors-in-lithuania-took-effect">https://www.migration.lt/dual-multiple-citizenship-for-minors-in-lithuania-took-effect</a> (01.12.2022)
Luxembourg	LU	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/luxembourg/">https://www.dualcitizenshipreport.org/dual-citizenship/luxembourg/</a> (02.12.2021)
Malta	MT	1	yes	allowed if born abroad	dual citizenship: generally allowed if born abroad to a parent who is a citizen of Malta by birth (in Malta) or by naturalisation or by registration; no dual citizenship if parent or grandparent has Maltese citizenship by registration based on descent; naturalized / registered dual citizens: declaration of interest to remain citizen if person is permanently resident abroad; out of wedlock + Maltese father: non-acquisition (wedlock restriction)	non-acquisition for 3rd generation; restriction for naturalized citizens who reside permanently abroad; wedlock restriction if born out of wedlock and father is Maltese citizen	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://komunita.gov.mt/en/services/acquisition-of-citizenship/">https://komunita.gov.mt/en/services/acquisition-of-citizenship/</a> <a href="https://www.granthornton.com.mt/service/citizenship/acquisition-of-citizenship-by-registration/#:~:text=The%20Maltese%20Citizenship%20Act%20(Cap.aquire%20Maltese%20citizenship%20by%20registration">https://www.granthornton.com.mt/service/citizenship/acquisition-of-citizenship-by-registration/#:~:text=The%20Maltese%20Citizenship%20Act%20(Cap.aquire%20Maltese%20citizenship%20by%20registration</a> <a href="https://www.malta-citizenship.eu/maltese-citizenship-by-descent#:~:text=A%20person%20born%20outside%20Malta,there%20is%20no%20residency%20requirement">https://www.malta-citizenship.eu/maltese-citizenship-by-descent#:~:text=A%20person%20born%20outside%20Malta,there%20is%20no%20residency%20requirement</a> <a href="https://visaguide.world/europe/malta-visa/citizenship/">https://visaguide.world/europe/malta-visa/citizenship/</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/malta/">https://www.dualcitizenshipreport.org/dual-citizenship/malta/</a> EUDO Country Report (2015) (02.12.2021)

– CONTINUED –

Table A1.2: Research results and sources – V ex2

– CONTINUED –

Country	ISO2	ex2		Additional information	Conditions	Further information	Procedure	Main sources	Additional sources
Netherlands	NL	1	yes	allowed if born abroad	dual citizens who have been resident outside the European Union (EU) for an uninterrupted period of 10 years for other than diplomatic purposes or work in an international organisation; loss of citizenship; prevention: residence in the EU for more than 1 year, or when the person obtains a certificate of possession of citizenship or a passport-like document	residence restriction	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/netherlands/">https://www.dualcitizenshipreport.org/dual-citizenship/netherlands/</a> <a href="https://www.netherlandsworldwide.nl/dutch-nationality/birth-recognition">https://www.netherlandsworldwide.nl/dutch-nationality/birth-recognition</a> (02.12.2021)
Poland	PL	1	yes	allowed if born abroad	restriction for children of binational parents: establishment of paternity/maternity must occur within one year after birth	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/poland/">https://www.dualcitizenshipreport.org/dual-citizenship/poland/</a> (02.12.2021)
Portugal	PT	1	yes	allowed if born abroad	registration/declaration if born abroad (and parents not in the service of Portugal)	n.a.	automatic (attribution); entitlement (application) if parents are not in the service of Portugal	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://washingtonte.mbaixadaportugal.mne.gov.pt/en/consular-services/consular-services/acquisition-of-portuguese-nationality-by-children-of-portuguese-citizens">https://washingtonte.mbaixadaportugal.mne.gov.pt/en/consular-services/consular-services/acquisition-of-portuguese-nationality-by-children-of-portuguese-citizens</a> (02.12.2021) <a href="https://eportugal.gov.pt/en/servicos/registar-um-nascimento">https://eportugal.gov.pt/en/servicos/registar-um-nascimento</a> <a href="https://www.portuguese-nationality.com/nationality/citizenship-for-descendants">https://www.portuguese-nationality.com/nationality/citizenship-for-descendants</a> <a href="https://portal.diplomatico.mne.gov.pt/en/communication-and-media/press-releases/online-birth-registration-now-available-outside-europe#:~:text=Access%20to%20the%20online%20birth,the%20PIN%20code%20for%20authentication.">https://portal.diplomatico.mne.gov.pt/en/communication-and-media/press-releases/online-birth-registration-now-available-outside-europe#:~:text=Access%20to%20the%20online%20birth,the%20PIN%20code%20for%20authentication.</a> (07.12.2022)
Romania	RO	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/romania/">https://www.dualcitizenshipreport.org/dual-citizenship/romania/</a> (02.12.2021)
Slovakia	SK	1	yes	allowed if born abroad	n.a.	n.a.	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/slovakia/">https://www.dualcitizenshipreport.org/dual-citizenship/slovakia/</a> <b>EUDO Country Report (2013)</b> (02.12.2021) <a href="https://www.mic.iom.sk/en/citizenship/loss-of-slovak-citizenship.html">https://www.mic.iom.sk/en/citizenship/loss-of-slovak-citizenship.html</a> <a href="https://www.akmv.sk/en/how-to-keep-slovak-citizenship-after-acquiring-citizenship-of-another-state/">https://www.akmv.sk/en/how-to-keep-slovak-citizenship-after-acquiring-citizenship-of-another-state/</a> (02.02.2023)
Slovenia	SI	1	yes	allowed if born abroad	application if only one parent is a citizen	dual citizenship restriction (application before age of 18 or between 18 and 36)	entitlement (application)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.gov.si/en/topics/citizenship/">https://www.gov.si/en/topics/citizenship/</a> (02.12.2021)
Spain	ES	1	yes	allowed if born abroad	dual citizens born abroad to a citizen who was also born abroad, and resident abroad: declaration expressing the desire to retain citizenship within 3 years of attaining majority or emancipation	request for 2nd generation after age of majority	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="http://www.exteriores.gob.es/Portal/en/ServiciosAlCiudadano/InformacionParaExtranjeros/Paginas/Nacionalidad.aspx">http://www.exteriores.gob.es/Portal/en/ServiciosAlCiudadano/InformacionParaExtranjeros/Paginas/Nacionalidad.aspx</a> (02.12.2021)
Sweden	SE	1	yes	allowed if born abroad	dual citizens born abroad who never lived or stayed in Sweden under circumstances indicating a link to the country upon the age of 22: request to remain a citizen (before reaching the age of 22)	proof of link if resident abroad (after majority); note: wedlock restriction before 2014	automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/sweden/">https://www.dualcitizenshipreport.org/dual-citizenship/sweden/</a> (02.12.2021) <a href="https://www.migrationsverket.se/English/Private-individuals/Becoming-a-Swedish-citizen/Apply-for-citizenship/Automatic-citizenship-through-birth-adoption-or-the-parents-marriage.html">https://www.migrationsverket.se/English/Private-individuals/Becoming-a-Swedish-citizen/Apply-for-citizenship/Automatic-citizenship-through-birth-adoption-or-the-parents-marriage.html</a> (02.12.2022)

Variable ex2+: external dual citizenship, limitation – limitation of dual citizenship acquisition abroad based on the generational status

Country	ISO2	ex2+	Additional information	Generation	Conditions	Criteria / Link	Further information	Procedure	Main sources	Additional sources	
Austria	AT	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	restriction for children of binational parents born out of wedlock to foreign mother and Austrian father: recognition of paternity within 8 weeks after birth	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.migration.gv.at/en/living-and-working-in-austria/integration-and-citizenship/citizenship/">https://www.migration.gv.at/en/living-and-working-in-austria/integration-and-citizenship/citizenship/</a> EUDO Country Report (2013)  (01.12.2021)
Belgium	BE	1	yes	delimited dual citizenship if born abroad	2nd / 3rd	after age of majority, before age of 28: request / before age of 5: registration	generation (2nd) + dual citizenship + residence + request + age (after majority) / generation (3rd) + registration	2nd gen: loss if born abroad AND citizen of another country AND resided uninterruptedly abroad from the age of 18 until 28 AND no request to remain a citizen before reaching the age of 28 (dual citizenship restriction) from the 3rd gen: non-acquisition if born abroad AND parent also born abroad AND no registration before reaching the age of 5 (dual citizenship restriction; avoidance of statelessness: automatic acquisition if no citizenship of another country at the age of 18)	loss: lapse (if no request); acquisition: automatic (attribution) / entitlement (application)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.multipliciteitszaken.be/wsc/bs_BELGIUM.html">https://www.multipliciteitszaken.be/wsc/bs_BELGIUM.html</a> EUDO Country Report (2013)  (01.12.2021)
Bulgaria	BG	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenship.com/countries/bulgaria.html">https://www.dualcitizenship.com/countries/bulgaria.html</a>  (01.12.2021)
Croatia	HR	1	yes	delimited dual citizenship if born abroad	2nd	registration if only one parent is a citizen (before age of 21)	generation (2nd+) + dual citizenship + registration + age (after majority)	from the 2nd generation: non-acquisition if born abroad AND only one parent is citizen of Croatia AND no registration before reaching the age of 21 (dual citizenship restriction; avoidance of statelessness: provision does not apply if person would become stateless)	acquisition: one parent Croatia discretionary (application)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<b>EUDO Country Report (2013)</b>  (02.12.2021) <a href="https://mvep.gov.hr/UserDocsImages/2022/datoteke/Croatian%20Citizenship%20Overview%20Jan%202022.pdf">https://mvep.gov.hr/UserDocsImages/2022/datoteke/Croatian%20Citizenship%20Overview%20Jan%202022.pdf</a> <a href="https://www.expatriatocroatia.com/croatian-citizenship-descent/">https://www.expatriatocroatia.com/croatian-citizenship-descent/</a> (20.12.2022)
Cyprus	CY	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	registration necessary, but neither regulated by a law nor any regulation, i.e. not (timely) restricted; theoretically: from the 2nd generation: non-acquisition if born abroad AND permanently resident abroad AND no registration; i.e. generation (2nd+) + residence + registration	acquisition: automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/cyprus/">https://www.dualcitizenshipreport.org/dual-citizenship/cyprus/</a>  (01.12.2021)
Czech Republic	CZ	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/czech-republic/">https://www.dualcitizenshipreport.org/dual-citizenship/czech-republic/</a>  (01.12.2021)
Denmark	DK	1	yes	delimited dual citizenship if born abroad	2nd	before age of 22: request	generation (2nd+) + dual citizenship + residence (+ genuine link) + request + age (after majority)	from the 2nd generation: loss if born abroad AND citizen of another country AND never lived or stayed in Denmark under circumstances indicating a link to the country upon the age of 22 AND no request to remain a citizen before reaching the age of 22 (dual citizenship restriction; avoidance of statelessness: provision does not apply if person would become stateless)	loss: lapse (if no request); acquisition: automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://canada.um.dk/en/travel-and-residence/consular-matter/danish-citizenship">https://canada.um.dk/en/travel-and-residence/consular-matter/danish-citizenship</a> EUDO Country Report (2015)  (01.12.2021)
Estonia	EE	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/estonia/">https://www.dualcitizenshipreport.org/dual-citizenship/estonia/</a> <a href="https://www.esti.ee/en/citizenship-and-documents/citizenship/estonia-n-citizenship">https://www.esti.ee/en/citizenship-and-documents/citizenship/estonia-n-citizenship</a>  (01.12.2021)
Finland	FI	1	yes	delimited dual citizenship if born abroad	2nd	before age of 22: request	generation (2nd+) + dual citizenship + residence (+ genuine link) + request + age (after majority)	from the 2nd generation: loss if born abroad AND citizen of another country AND never lived or stayed in Finland under circumstances indicating a link to the country upon the age of 22 AND no request to remain a citizen before reaching the age of 22 (dual citizenship restriction; avoidance of statelessness: provision does not apply if person would become stateless)	loss: lapse (if no request); acquisition: automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://migri.fi/en/retaining-finnish-citizenship-at-the-age-of-22">https://migri.fi/en/retaining-finnish-citizenship-at-the-age-of-22</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/finland/">https://www.dualcitizenshipreport.org/dual-citizenship/finland/</a> EUDO Country Report (2013)  (01.12.2021)

– CONTINUED –

Table A1.2: Research results and sources – V ex2+

– CONTINUED –

Country	ISO2	ex2+	Additional information	Generation	Conditions	Criteria / Link	Further information	Procedure	Main sources	Additional sources	
France	FR	1	yes	delimited dual citizenship if born abroad	2nd	own + parental residence (<50 years abroad) + ties to the state	generation (2nd) + residence + parental residence (>50 years abroad) + nationality certificate	from the 2nd generation: loss if born abroad AND never possessed "status of French national" (i.e. has never applied for a passport, registered at the consulate or for the elections of the country) AND has never resided in France AND parents did not have the status of French national AND have not resided in France (>= 50 years) (parental / residence restriction)	loss: withdrawal; acquisition: automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.legislationline.org/documents/id/20111">https://www.legislationline.org/documents/id/20111</a> EUDO Country Report (2013) (02.12.2021) <a href="https://www.fd.ulisboa.pt/wp-content/uploads/2014/12/Codigo-Civil-Francia-French-Civil-Code-english-version.pdf">https://www.fd.ulisboa.pt/wp-content/uploads/2014/12/Codigo-Civil-Francia-French-Civil-Code-english-version.pdf</a> (21.12.2021)
Germany	DE	1	yes	delimited dual citizenship if born abroad	3rd	before age of 1: registration	generation (3rd+) + dual citizenship + parental residence + registration + age (<1)	from the 3rd gen: non-acquisition if born abroad AND citizen of another country AND parents resident abroad at child's birth AND no registration before reaching the age of 1 (dual citizenship restriction; avoidance of statelessness: provision does not apply if person would become stateless)	acquisition: entitlement (registration)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://uk.diplo.de/uk-en/02/citizenship/acquiring-german-citizenship/246362#content_3">https://uk.diplo.de/uk-en/02/citizenship/acquiring-german-citizenship/246362#content_3</a> (02.12.2021)
Greece	GR	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenship.com/free-consultation/greece.html">https://www.dualcitizenship.com/free-consultation/greece.html</a> (02.12.2021)
Hungary	HU	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/hungary/">https://www.dualcitizenshipreport.org/dual-citizenship/hungary/</a> (02.12.2021)
Ireland	IE	1	yes	delimited dual citizenship if born abroad	3rd	registration in foreign birth register	generation (3rd+) + registration	from the 3rd gen: non-acquisition if born abroad AND no registration	acquisition: entitlement (registration)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.citizensinformation.ie/en/moving_country/irish_citizenship/irish_citizenship_th_rough_birth_or_descent.html">https://www.citizensinformation.ie/en/moving_country/irish_citizenship/irish_citizenship_th_rough_birth_or_descent.html</a> <a href="https://www.dfa.ie/citizenship/born-abroad/">https://www.dfa.ie/citizenship/born-abroad/</a> <a href="https://www.dualcitizenship.com/free-consultation/ireland.html">https://www.dualcitizenship.com/free-consultation/ireland.html</a> (02.12.2021)
Italy	IT	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/italy/">https://www.dualcitizenshipreport.org/dual-citizenship/italy/</a> EUDO Country Report (2013) (02.12.2021)
Latvia	LV	1	yes	delimited dual citizenship if born abroad	2nd	permitted country only	dual citizenship	from the 2nd gen: non-acquisition if born abroad AND citizen of another country with which dual citizenship is not permitted (dual citizenship restriction)	non-acquisition / decision after age of majority (18-25 years) if dual citizenship has been acquired	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/latvia/">https://www.dualcitizenshipreport.org/dual-citizenship/latvia/</a> <a href="https://www.pmlp.gov.lv/en/dual-citizenship">https://www.pmlp.gov.lv/en/dual-citizenship</a> EUDO Country Report (2015) (02.12.2021)
Lithuania	LT	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.renkuosilietuva.lt/en/dual-citizenship/">https://www.renkuosilietuva.lt/en/dual-citizenship/</a> <a href="https://www.migration.lt/dual-children-citizenship-at-the-age-of-21-they-do-not-need-to-choose-one-of-the-citizenships-anymore">https://www.migration.lt/dual-children-citizenship-at-the-age-of-21-they-do-not-need-to-choose-one-of-the-citizenships-anymore</a> (02.12.2021) <a href="https://www.migration.lt/dual-multiple-citizenship-for-minors-in-lithuania-took-effect">https://www.migration.lt/dual-multiple-citizenship-for-minors-in-lithuania-took-effect</a> (01.12.2022)
Luxembourg	LU	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.luxcitizenship.com/luxembourg-dual-citizenship-eligibility/">https://www.luxcitizenship.com/luxembourg-dual-citizenship-eligibility/</a> EUDO Country Report (2017) (02.12.2021)
Malta	MT	1	yes	delimited dual citizenship if born abroad	3rd	generation (= parents born in territory)	generation (3rd+ = place of birth of parents)	from the 3rd generation: non-acquisition if born abroad	non-acquisition	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://komunita.gov.mt/en/services/acquisition-of-citizenship/">https://komunita.gov.mt/en/services/acquisition-of-citizenship/</a> <a href="https://www.dualcitizenshipreport.org/dual-citizenship/malta/">https://www.dualcitizenshipreport.org/dual-citizenship/malta/</a> EUDO Country Report (2015) (02.12.2021) <a href="https://legislation.mt/eli/cap/188/eng/pdf">https://legislation.mt/eli/cap/188/eng/pdf</a> (21.12.2022)

– CONTINUED –

Table A1.2: Research results and sources – V ex2+

– CONTINUED –

Country	ISO2	ex2+	Additional information	Generation	Conditions	Criteria / Link	Further information	Procedure	Main sources	Additional sources	
Netherlands	NL	1	yes	delimited dual citizenship if born abroad	1st	after age of majority also for 1st generation if residence abroad (not based on birth abroad); residence (>1 year) / nationality certificate	residence / nationality certificate + dual citizenship + age (after majority)	from the 1st gen: loss if person is an adult AND has been resident outside the EU for an uninterrupted period of 13 years (before April 1, 2022: 10 years); prevention: residence in the EU for more than 1 year OR certificate of possession of citizenship or a passport-like document (dual citizenship restriction; avoidance of statelessness: provision does not apply if person would become stateless)	loss: lapse (if no residence >1 year) / nationality certificate; acquisition: automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.government.nl/topics/dutch-citizenship/documents/forms/2017/06/16/factsheet-could-i-lose-my-dutch-nationality-automatically-and-how-can-i-avoid-this">https://www.government.nl/topics/dutch-citizenship/documents/forms/2017/06/16/factsheet-could-i-lose-my-dutch-nationality-automatically-and-how-can-i-avoid-this</a> <a href="https://www.government.nl/biographies/government/documenten/forms/2017/06/16/factsheet-could-i-lose-my-dutch-nationality-automatically-and-how-can-i-avoid-this/22404921_RO_JENV_A4_FS_Nationaliteit_EN_V2.pdf">https://www.government.nl/biographies/government/documenten/forms/2017/06/16/factsheet-could-i-lose-my-dutch-nationality-automatically-and-how-can-i-avoid-this/22404921_RO_JENV_A4_FS_Nationaliteit_EN_V2.pdf</a> <a href="https://www.netherlandsworldwide.nl/declaration/dutch-nationality-certificate-when">https://www.netherlandsworldwide.nl/declaration/dutch-nationality-certificate-when</a> <a href="https://www.netherlandsworldwide.nl/dutch-nationality/loss">https://www.netherlandsworldwide.nl/dutch-nationality/loss</a> <a href="https://www.everaert.nl/en/areas-of-expertise/dutch-citizenship/1264-how-to-prevent-the-loss-of-dutch-citizenship">https://www.everaert.nl/en/areas-of-expertise/dutch-citizenship/1264-how-to-prevent-the-loss-of-dutch-citizenship</a> (05.12.2022)
Poland	PL	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	restriction for children of binational parents: establishment of paternity/matrimony must occur within one year after birth	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/poland/">https://www.dualcitizenshipreport.org/dual-citizenship/poland/</a> (02.12.2021)
Portugal	PT	1	yes	delimited dual citizenship if born abroad	2nd / 3rd	registration (before or after age of majority)	generation (2nd+) + registration / generation (3rd+) + nationality of grandparent + registration + genuine link	2nd gen: non-acquisition if born abroad AND no registration from the 3rd generation: non-acquisition if born abroad AND no grandparent with Portuguese nationality AND no registration and declaration AND no effective ties to the national community (e.g. language, regular contacts with territory)	acquisition: entitlement (application)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://portuguese-american-journal.com/community-citizenship-granted-to-grandchildren-of-portuguese-expats-portugal/">https://portuguese-american-journal.com/community-citizenship-granted-to-grandchildren-of-portuguese-expats-portugal/</a> <a href="https://washingtondc.embaixadaportugal.mne.gov.pt/en/consular-services/consular-services/acquisition-of-portuguese-nationality-by-children-of-portuguese-citizens">https://washingtondc.embaixadaportugal.mne.gov.pt/en/consular-services/consular-services/acquisition-of-portuguese-nationality-by-children-of-portuguese-citizens</a> EUDO Country Report (2020) (02.12.2021) <a href="https://www.refworld.org/pdfid/3ae6b52e4.pdf">https://www.refworld.org/pdfid/3ae6b52e4.pdf</a> (21.12.2022)
Romania	RO	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/romania/">https://www.dualcitizenshipreport.org/dual-citizenship/romania/</a> (02.12.2021)
Slovakia	SK	0	no	unlimited dual citizenship if born abroad	n.a.	n.a.	n.a.	n.a.	n.a.	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenshipreport.org/dual-citizenship/slovakia/">https://www.dualcitizenshipreport.org/dual-citizenship/slovakia/</a> EUDO Country Report (2013) (02.12.2021)
Slovenia	SI	1	yes	delimited dual citizenship if born abroad	2nd	application if only one parent is a citizen (before age of 18 or between 18 and 36)	generation (2nd+) + dual citizenship + application	from the 2nd generation: non-acquisition at birth if born abroad AND only one parent is citizen of Slovenia AND no application before reaching the age of 18 / 36 (dual citizenship restriction; avoidance of statelessness: provision does not apply if person would become stateless)	acquisition: entitlement (application)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.gov.si/en/topics/citizenship/">https://www.gov.si/en/topics/citizenship/</a> EUDO Country Report (2013) (02.12.2021)
Spain	ES	1	yes	delimited dual citizenship if born abroad	3rd	after age of majority, before age of 21: request	generation (3rd+) + dual citizenship + residence + request + age (after majority)	from the 3rd gen: loss if born abroad AND citizen of another country AND resident abroad AND 21 years of age or 19 in exceptional cases AND no request to remain a citizen after age of majority and before reaching the age of 21 (dual citizenship restriction; avoidance of statelessness: provision does not apply if person would become stateless)	loss: lapse (if no request); acquisition: automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="http://www.exteriores.gob.es/Portal/en/ServiciosAlCiudadano/InformacionParaExtranjeros/Paginas/Nacionalidad.aspx">http://www.exteriores.gob.es/Portal/en/ServiciosAlCiudadano/InformacionParaExtranjeros/Paginas/Nacionalidad.aspx</a> (02.12.2021) <a href="https://www.immigrationspain.es/en/lose-citizenship/">https://www.immigrationspain.es/en/lose-citizenship/</a> (05.01.2023)
Sweden	SE	1	yes	delimited dual citizenship if born abroad	2nd	before age of 22: request	generation (2nd+) + dual citizenship + residence (+ genuine link) + request + age (after majority)	from the 2nd generation: loss if born abroad AND citizen of another country AND never resided in Sweden (or at least seven years in Sweden or another Nordic state), and never stayed in Sweden under circumstances indicating a special tie to the country AND no request to remain a citizen before reaching the age of 22 (dual citizenship restriction; avoidance of statelessness: provision does not apply if person would become stateless)	loss: lapse (if no request); acquisition: automatic (attribution)	GLOBALCIT CLD (A01b, A04, L02; 2022)	<a href="https://www.dualcitizenship.com/countries/sweden.html">https://www.dualcitizenship.com/countries/sweden.html</a> (02.12.2021)

## Annex A1.1: Overview of sources

### Main sources for all variables

- Vink, Maarten, Luuk van der Baaren, Rainer Bauböck, Jelena Džankić, Iseult Honohan, and Bronwen Manby. 2023. "GLOBALCIT Citizenship Law Dataset, v2.0, Country-Year-Mode Data ([Acquisition]/[Loss])." Florence. <https://hdl.handle.net/1814/73190>.
- Vink, Maarten, Gerard-Rene De Groot, and Ngo Chun Luk. 2015. "MACIMIDE Global Expatriate Dual Citizenship Dataset. Harvard Dataverse, V5 [2020]." Maastricht. <https://doi.org/10.7910/DVN/TTMZ08>.
- GLOBALCIT. 2023. "Country Profiles." Florence. <https://globalcit.eu/country-profiles/>.
- . 2022. "Global Nationality Laws Database." Florence. <https://globalcit.eu/national-citizenship-laws/>.

For further information about respective variables see Table A1.2

### Further resources for verification and double checks

- Baaren, Luuk van der. 2020. "Dual Citizenship in the European Union : Trends and Analysis (2010-2020)." Florence.
- Dumbrava, Costica. 2014. "External Citizenship in EU Countries." *Ethnic and Racial Studies* 37(13): 2340–60. <https://doi.org/10.1080/01419870.2013.826812>.
- . 2014. "Nationality, Citizenship and Ethno-Cultural Belonging. Preferential Membership Policies in Europe." Palgrave M. Basingstoke.
- Sejersen, Tanja Brøndsted. 2008. "'I Vow to Thee My Countries' - The Expansion of Dual Citizenship in the 21st Century." *International Migration Review* 42(3): 523–49. <https://doi.org/10.1111/j.1747-7379.2008.00136.x>.
- Solano, Giacomo, and Thomas Huddleston. 2020. "Migrant Integration Policy Index 2020." Brussels/Barcelona. <https://www.mipex.eu/>.

For information about sources and additional online resources for the individual variables and countries see Table A1.2

## 8.2 Appendix of Article 2

**Supplemental materials: Barriers to naturalization: How dual citizenship restrictions impede full membership.**

The following supplemental materials are also accessible here:

<https://onlinelibrary.wiley.com/action/downloadSupplement?doi=10.1111%2Fimig.12950&file=imig12950-sup-0001-Supinfo.doc>

## Annex A2.1: Overview of data collection and sampling

The 2011 BAMF Naturalisation Study (N=1,133) is a cross-sectional survey of the immigrant population in Germany.<sup>1</sup> It was designed for a comparison of first and second generation immigrants who were naturalized since 2005 (n=319), immigrants undergoing the naturalization process (n=403) as well as immigrants who fulfil the necessary residence requirements for naturalization (i.e., have been living in Germany for at least eight years and have a secure residence status), but did not yet naturalize (non-naturalized immigrants; n=411).<sup>2</sup>

The data was collected in 2011 in a mixed-mode method: Naturalized and non-naturalized immigrants were interviewed nationwide by means of computer-assisted telephone interviews based on a multistage sampling procedure. This was necessary since there is neither a central register with addresses for naturalized immigrants nor for foreigners living in Germany which could be used for random sampling in order to conduct personal interviews. In the first step, households were randomly sampled with an onomastic technique, i.e., an identification of immigrants in the telephone index by their names. Target persons were identified through a screening interview in the second step. If there were at least two persons of the target group living in the household, the interviewee was identified in a third step through a computer-based random selection process. Immigrants undergoing the naturalization process were interviewed personally (computer-assisted personal interviews). This was possible, because the BAMF researchers were able to generate a random sample based on a register. This register has been compiled on the basis of address lists of immigrants who had applied for naturalization in 23 large cities, but had not yet been naturalized. The lists were provided by the naturalization authorities of these cities.

The interviews with naturalized immigrants and immigrants undergoing the naturalization process were conducted in German since proof of German language proficiency is a relevant requirement for naturalization. Non-naturalized immigrants were interviewed in German or another language (Farsi, Greek, Italian, Russian, Serbo-Croatian, or Turkish) because it was expected that not all target persons would have sufficient German language skills; 16% of the interviewees chose to be interviewed in one of these languages. It was planned to conduct interviews also in Arabic and Paschtu, but it was not possible to find interviewers with adequate language skills. All naturalized immigrants in the survey were naturalized between 2005 and the year of the survey (2011) and were 18 or older at the time of their naturalization. All other interviewees were 18 or older at the time of the survey.

The random sampling for all three target groups was devised disproportionately, in order to warrant a sufficient basis of interviews for the five most important regions of origin of naturalized and non-naturalized persons living in Germany (i.e., Turkey, successor states to the former Yugoslavia, Greece/Italy, Afghanistan/Iraq/Iraq, and Russian Federation/Ukraine/Belarus). All in all there are 17 countries of origin represented in the sample (see Table A2.2). To ensure a representative analysis, the data are weighted on the basis of information from official statistics for naturalizations and foreign nationals in Germany.<sup>3</sup>

### Note:

1. For the 2011 BAMF Naturalisation Study see Weinmann et al. (2012); for a summary in English see Federal Office for Migration and Refugees 2012 *The Naturalisation Behaviour of Foreigners in Germany, and Findings Concerning Optionspflichtige (Persons Required to Choose between Two Nationalities). Results of the 2011 BAMF Naturalisation Study*. Nuremberg: BAMF.
2. Besides these three groups regarding usual naturalization, the original study includes a special sample (n=401) of so called *Optionspflichtige* (persons required to choose between two nationalities). *Optionspflichtige* are a very special group regarding citizenship acquisition in Germany. After a conditional *ius soli* was introduced in German citizenship law in 2000, children who acquired German citizenship through this rule were required to choose between their German citizenship and the citizenship of their parent's origin country when they reached majority. This rule (the requirement to choose) was widely abolished in 2014. The sample of *Optionspflichtige* in the original study was born before the *ius soli* was introduced (between 1990 and 1999), but they were allowed to acquire German citizenship retrospectively under the same conditions and requirements as *ius soli* children if the parents had applied for German nationality on behalf of their children. Only 49,000 benefited from this opportunity. The sample of *Optionspflichtige* is not available for research on the grounds of data protection and thus not part of this study.
3. For detailed information about the weighting procedure see the methodology report: Pupeter, M., M. Stadler and U. Schneekloth 2011 *Das Einbürgerungsverhalten von Ausländerinnen und Ausländern in Deutschland – Methodenbericht*. München: TNS Infratest Sozialforschung: 41–48.

## Annex A2.2: Coding of origin country data for Analysis 1

**Possibility of dual citizenship (explanatory variable, see also Table A2.2):** The possibility of dual citizenship shows whether immigrants from a certain country are able to have dual citizenship or not when they voluntarily acquire the country of residence's citizenship (Germany). It has been coded for origin countries in the survey sample based on different sources to take into account both legal contexts.

The country of residence context was considered by official information whether immigrants from certain countries are exceptionally allowed to retain their original citizenship when they acquire German citizenship (see below: "Table A2.2: Retention possible in Germany"). The German regulations know few exceptions from the requirement of giving up the original citizenship for naturalization in Germany. First, there are exceptions for EU citizens (i.e., under condition of reciprocity for treatment for citizens of some EU countries until 2006 and in general since 2007). Second, there are exceptions if withdrawal of the origin country citizenship is legally or virtually impossible. There are no immigrants from countries of origin that do not legally allow for citizenship withdrawal in general in the sample. However, there are immigrants from two countries (Afghanistan, Iran) where "withdrawal is virtually impossible". This means that German regulations allow immigrants from these countries who naturalize in Germany to retain their origin country's citizenship if German authorities know that citizenship renunciations are "never or hardly ever" accepted in these countries. Thus, immigrants from these countries are allowed to retain their original citizenship even if it is theoretically possible to renounce it. The information is based on the instructions on citizenship law from the German Federal Ministry of the Interior from 2004, 2007 and 2009 (valid for the period from 2005 to 2011).<sup>1</sup>

The origin country context was considered by information on origin country rules regarding loss or renunciation of citizenship after voluntarily acquiring another citizenship based on the MACIMIDE Global Expatriate Dual Citizenship Database (Vink et al., 2015; see below: "Table A2.2: Automatic loss of origin country citizenship").

Data for naturalized immigrants is coded based on the legal information for the respective year of naturalization for each naturalized individual. As for immigrants undergoing the naturalization process as well as non-naturalized immigrants the respective information for the time of the survey in 2011 is used for coding. Possibility of dual citizenship is coded "yes" (1) if citizenship retention is possible due to regulations in the receiving country and if there is no automatic loss of the origin country's citizenship when the receiving country's citizenship is voluntarily acquired. The variable is coded "no" (0) if citizenship retention is not possible in the receiving country and the origin country's citizenship is automatically lost when the receiving country's citizenship is voluntarily acquired. The same applies if citizenship retention is not possible in the receiving country even if the origin country's citizenship is not automatically lost when the receiving country's citizenship is voluntarily acquired (see below: "Table A2.2: Synthesis: Possibility of dual citizenship").

**Quality of nationality (control variable, see also Table A2.2):** Information about the quality of citizenship is based on the Quality of Nationality Index<sup>2</sup> for 2011 (Kochenov and Lindeboom, 2019, see below: "Table A2.2: Quality of nationality"). It measures the internal value of nationality (the quality of life within the origin country) as well as the external value of nationality (the quality of opportunities abroad). The quality of an origin country's nationality in relation to the quality of the country of residence's nationality is measured by the difference between the value of German citizenship, which was rated second in 2011, and each origin country's value (see below: "Table A2.2: Difference in quality of nationality"). Since there is no Quality of Nationality data for the time before 2011 immigrants naturalized between 2005 and 2010 are also coded based on the data from the year of the survey (2011); the quality of nationality for most of the countries of origin varies little within a few years (see Kochenov and Lindeboom, 2019).

### Note:

1. Bundesministerium des Innern 2004 *Vorläufige Anwendungshinweise des Bundesministeriums des Innern zum durch das Zuwanderungsgesetz geänderten Staatsangehörigkeitsgesetz in der ab 1.1.2005 geltenden Fassung, Stand: 10. Dezember 2004*. Berlin: BMI.  
——— 2007 *Vorläufige Anwendungshinweise des Bundesministeriums des Innern vom 19. Oktober 2007 zum Staatsangehörigkeitsgesetz in der Fassung des Gesetzes zur Umsetzung aufenthalts- und asylrechtlicher Richtlinien der Europäischen Union vom 19. August 2007*. Berlin: BMI.  
——— 2009 *Vorläufige Anwendungshinweise des Bundesministeriums des Innern zum Staatsangehörigkeitsgesetz in der Fassung des Gesetzes zur Änderung des Staatsangehörigkeitsgesetzes vom 5. Februar 2009, Stand: 17. April 2009*. Berlin: BMI.
2. Kochenov, D. and J. Lindeboom 2017 "Empirical Assessment of the Quality of Nationalities. The Quality of Nationality Index (QNI)", *European Journal of Comparative Law and Governance*, 4(4): 314–336.

### Annex A2.3: Robustness checks

I performed several robustness checks on my analyses. Regarding *Analysis 1* I conducted a multilevel model since it could be argued that the hierarchical data structure resulting from the inclusion of information on the origin country level makes multilevel modelling necessary.<sup>1</sup> The results remain widely unchanged with respect to the direction of the relationship and significance of the variables. Nevertheless, in the multilevel model immigrants who believe that they are perceived as foreigners in Germany are significantly less likely to decide for naturalization (Table A2.6).

Further checks address the analysis of the desire to retain the original citizenship. Due to the limited sample size I did not include origin context variables in *Analysis 2*. In an alternative model I included an additional variable on the origin context level to control whether dual citizenship is possible or not (Table A2.7). The results remain widely unchanged regarding the independent and control variables; there are no significant effects for the possibility of dual citizenship. As has been stated in the main text several surveys in Germany show that even immigrants who are able to hold two passports are not necessarily aware of their right (e.g. Weinmann et al., 2012; Fick et al., 2014). Thus, additional robustness checks concern immigrants' knowledge about their dual citizenship options. An explanation for this finding could be that some immigrants do not know for sure which rules apply for them due to the exceptions for some immigrant groups in Germany. Descriptive checks illustrate that even immigrants who are able to retain their original citizenship say that citizenship retention is important to them (Table A2.8). This is less confusing if one considers that even 27 per cent of those immigrants who are able to retain their original citizenship incorrectly assume that they could not retain their original citizenship if they naturalize in Germany and 30 per cent do not know whether they are able to retain their original citizenship or not (Table A2.8). A further model controlling for immigrants' knowledge about their dual citizenship options shows no significant results for awareness of citizenship options (Table A2.9).

Additional robustness checks address possible concerns regarding *potential left out variables*. It could be argued that variables not included in my analyses might be relevant explanatory variables. Since several studies show that the individual level of integration affects immigrant naturalization I included further variables regarding individual integration in my models, i.e., educational attainment and employment. Employment can also serve as a proxy for further naturalization requirements to isolate potential bias from a lack of (practical) eligibility due to integration requirements for naturalization in Germany since means of subsistence have to be ensured on a sustained basis without requiring social benefits. Table A2.10 and Table A2.11 show that neither educational attainment nor employment are relevant explanatory variables for naturalization decision or the desire to retain the original citizenship.

Further checks concern *alternative operationalisations* of the variable "Length of stay" (not shown in the tables). The operationalisation in the main analysis follows findings of other studies on naturalization in Germany (Diehl and Blohm, 2003; Chiswick and Miller, 2009). These studies show that immigrants who have resided in the country for 25 years or longer are less likely to naturalize compared to immigrants who have resided in the country less than 25 years. Data from the German Federal Office for Statistics show that the average time of residence of immigrants who have been naturalized in 2011 was 15.6 years. An alternative operationalisation of the variable "Length of stay" shows that compared to immigrants born in Germany (n=232) immigrants who have been living in Germany for less than 16 years (n=424) are more likely to decide for naturalization while immigrants who have been living in Germany for at least 16 years (n=390) are less likely to naturalize. Another alternative operationalisation of the variable "Length of stay" in "years" (with "age in years" for immigrants who are born in Germany) shows a negative effect of "Length of stay". There are no significant effects for "Length of stay" using these alternative operationalisations for analysing the desire to retain the original citizenship. This is in line with the results of the main analysis.

Note:

1. Multilevel models usually require a higher number of contextual units (e.g. Maas, C.J.M. and J.J. Hox 2004 "Robustness issues in multilevel regression analysis", *Statistica Neerlandica*, 58(2): 127–137.)

**Table A2.1: Operationalization and coding**

Variable	Source, operationalisation, wording, categories	Coding
<b>Dependent variables</b>		
Naturalization decision	BAMF Naturalisation Study <i>sample groups</i>	
	non-naturalized immigrants	(0) no
	immigrants undergoing the naturalization process	(1) yes
	naturalized immigrants	
<hr/>		
Desire to retain the original citizenship	BAMF Naturalisation Study Non-naturalized immigrants only: <i>I will give you potential reasons against naturalization. Which one of the following are playing an important or very important role for you? And which one are playing a less important role or no role at all?</i> – <i>I want to retain my original citizenship</i>	
	(4) no important role	(0) no
	(3) less important role	
	(2) rather important role	(1) yes
	(1) very important role	
<hr/>		
<b>Explanatory variables</b>		
Possibility of dual citizenship	Federal Ministry of the Interior / MACIMIDE Global Expatriate Dual Citizenship Database <i>Information on both legal contexts</i> <i>Germany: Federal Ministry of the Interior (Bundesministerium des Innern 2004, 2007, 2009)</i> <i>countries of origin: MACIMIDE Global Expatriate Dual Citizenship Database</i>	
	not allowed to retain original citizenship when naturalizing in Germany / loss or renunciation of origin country citizenship when acquiring another citizenship	(0) no
	allowed to retain original citizenship when naturalizing in Germany / no loss or renunciation of origin country citizenship when acquiring another citizenship	(1) yes
<hr/>		
Perceived as a foreigner	BAMF Naturalisation Study <i>Please tell me to what extent you agree or disagree with the following statements.</i> – <i>I am perceived as a foreigner in Germany.</i>	
	(5) do not agree at all	(1) no
	(4) rather disagree	
	(3) partly	(2) partly
	(2) rather agree	(3) yes
	(1) fully Agree	

– CONTINUED –

Table A2.1: Operationalisation and coding  
– CONTINUED –

Family against naturalization	<p>BAMF Naturalisation Study</p> <p>Naturalized immigrants and immigrants undergoing the naturalization procedure: <i>I will give you potential reasons against naturalization. Which one of the following were playing an important or very important role for you – at least in the beginning? And which one were playing a less important role or no role at all?</i></p> <p>Non-naturalized immigrants: <i>I will give you potential reasons against naturalization. Which one of the following are playing an important or very important role for you? And which one are playing a less important role or no role at all?</i></p> <p>– <i>My family is against naturalization</i></p>	
	<p>(4) no important role (3) less important role (2) rather important role (1) very important role</p>	<p>(0) no   (1) yes</p>
<b>Control variables</b>		
Residence country language proficiency	<p>BAMF Naturalisation Study</p> <p><i>Now I would like to know more about your German language skills. Based on your self-assessment:</i></p> <p><i>a) How well do you speak German?</i> <i>b) How well do you read German?</i> <i>c) How well do you write German?</i></p>	
	<p>(1) very good (2) (3) (4) (5) (6) not at all</p>	<p>Index: mean out of speak, read, write; recoded (min.: 1 “absolutely not“, max.: 6 “very good”)</p>
Identification	<p>BAMF Naturalisation Study</p> <p><i>With which country do you feel a greater affinity?</i></p>	
	<p>(1) primarily country of origin (2) both countries equally (3) primarily Germany</p>	<p>(1) country of origin (2) both countries (3) country of residence</p>
Difference in quality of nationality	<p>Quality of Nationality Index</p> <p><i>Ranking of the quality of nationalities</i></p>	
	<p>Quality of Nationality Index 2011: Difference between the value of residence country citizenship and value of origin country citizenship</p>	<p>Difference between index values: Germany – origin country (min. 2.6, max.: 66.9)</p>

– CONTINUED –

Table A2.1: Operationalisation and coding  
 – CONTINUED –

Subjective expectation of benefits through naturalization	BAMF Naturalisation Study	
	Non-naturalized immigrants only: <i>I will give you potential reasons against naturalization. Which one of the following are playing an important or very important role for you? And which one are playing a less important role or no role at all?</i>	
	<i>– I do not expect benefits from naturalization.</i>	
	(4) no important role	(0) no
	(3) less important role	
	(2) rather important role	(1) yes
	(1) very important role	
Sex	BAMF Naturalisation Study	
	<i>Interviewer reported</i>	
	(2) male	(0) male
	(1) female	(1) female
Length of stay	BAMF Naturalisation Study	
	<i>born in Germany (second generation) / years since immigration to Germany (first generation; naturalized immigrants and immigrants undergoing the naturalization procedure: at the time of the naturalization application; non-naturalized immigrants: at the time of the interview)</i>	
	born inland (second generation)	born in Germany
	time of immigration (first generation)	<25 years of residence
	time of immigration (first generation)	≥25 years of residence
Intention to stay	BAMF Naturalisation Study	
	<i>Do you intend to leave Germany for a longer period of time, i.e. more than one year or to leave for good – meaning no vacations? If so, where to would you like to leave?</i>	
	(1) Yes, to my country of origin	(0) no
	(2) Yes, to another country	
	(3) No, intend to stay in Germany	(1) yes

*Note:* Source: 2011 BAMF Naturalisation Study, German Federal Ministry of the Interior, MAC-IMIDE Global Expatriate Dual Citizenship Database, Quality of Nationality Index

**Table A2.2: Data for countries of origin**

Citizenship of interviewees by origin country	n (A1/A2)	Retention possible in Germany (year of naturalization)	Automatic loss of origin country citizenship (year of naturalization)	Synthesis: Possibility of dual citizenship	Quality of nationality	Difference in quality of nationality
Afghanistan	50 (49/7)	1 (2005-2011)	2 (2005-2011)	yes	15.4	66.9
Bosnia & Herzegovina	68 (65/26)	0 (2005-2011)	1 (2005-2011)	no	29.4	52.9
Belarus	12 (12/4)	0 (2005-2011)	2 (2005-2011)	no	31.4	50.9
Greece	86 (81/20)	2 (2005-2011)	2 (2005-2011)	yes	74.8	7.5
Croatia	43 (38/22)	0 (2005-2011)	2 (2005-2011)	no	42.9	39.4
Iraq	3 (3/0)	0 (2005-2011)	1 (2005)	no	19.3	63.0
Iran	64 (59/5)	0 (2005-2011)	2 (2006-2011)	no	24.6	57.7
Italy	127 (118/53)	1 (2005-2011)	2 (2005-2011)	yes	79.7	2.6
Montenegro	102 (95/55)	2 (2005-2011)	2 (2005-2011)	yes	36.4	45.9
(North) Macedonia	6 (6/2)	0 (2007-2011)	2 (2007-2011)	no	35.8	46.5
Serbia	13 (13/6)	0 (2005-2011)	2 (2005-2011)	no	35.8	46.5
	1 (1/0)	0 (2007-2011)	1 (2007)	no	35.8	46.5
	46 (45/18)	0 (2007-2011)	2 (2008-2011)	no	35.4	46.9
Russian Federation	125 (112/44)	0 (2005-2011)	2 (2005-2011)	no	34.1	48.2
Turkey	231 (215/71)	0 (2005-2011)	2 (2005-2011)	no	31.8	50.5
Ukraine	113 (105/26)	0 (2005-2011)	2 (2005-2011)	no	24.4	57.9
Kosovo	29 (29/1)	0 (2008-2011)	2 (2008-2011)	no	/	/
Yugoslavia	9 (0/1)	/(2005-2011)	/(2005-2011)	/	/	/
Serbia & Montenegro	1 (0/0)	0 (2005-2006)	2 (2005-2006)	no	/	/
	4 (0/0)	/(2007-2011)	/(2007-2011)	/	/	/
Germany (country of residence)	-	-	-	-	82.3	-
Source	2011 BAMF Naturalisation Study	Federal Ministry of the Interior (Bundesministerium des Innern 2004; 2007; 2009)	MACIMIDE Global Expatriate Dual Citizenship Database (dualcit_grouped* recorded)*	Synthesis (0=no 1=yes)	Quality of Nationality Index 2011	Quality of Nationality Index 2011: difference to Germany

Note: n: A1=Analysis 1, A2=Analysis 2; Retention possible in Germany: 0=retention not possible, 1=retention possible (i.e., withdrawal virtually impossible), 2=retention possible under condition of reciprocity of treatment for citizens of some EU countries (2005-2006) or retention possible for EU citizens in general (2007-2011), /=country does not exist in the reference year and cannot be coded alternatively; Automatic loss of origin country citizenship: 1=automatic loss, 2=no automatic loss, but renunciation of citizenship is possible or not, /=country does not exist in the reference year and cannot be coded alternatively; \*Kosovo has been coded based on data from the EUDO Citizenship Observatory (see Krasniqi, G. 2012 *EUDO Citizenship Observatory. Country Report: Kosovo. Revised and updated November 2012*. San Domenico di Fiesole: European University Institute.); Quality of nationality: /=country does not exist in the reference year and cannot be coded alternatively. See Annex A2.2 for further information regarding the coding of the origin country data. Source: 2011 BAMF Naturalisation Study, German Federal Ministry of the Interior, MACIMIDE Global Expatriate Dual Citizenship Database, Quality of Nationality Index.

**Table A2.3: Sample characteristics**

<b>Indicator</b>	<b>%</b>	<b>Mean</b>	<b>SD</b>	<b>N</b>
<b>Analysis 1</b>				
<b>Dependent variable</b>				
Naturalization decision				1,046
no	36%			
yes	64%			
<b>Legal barriers</b>				
Possibility of dual citizenship				1,046
no	81%			
yes	19%			
<b>Perceived barriers</b>				
Perceived as a foreigner				1,046
no	42%			
partly	24%			
yes	34%			
Family against naturalization				1,046
no	89%			
yes	11%			
<b>Control variables</b>				
<b><i>Individual level of integration</i></b>				
Residence country language proficiency				1,046
index (self-estimation): speak, read, write (min.: 1 “absolutely not”, max.: 6 “very good”)		5.2	0.8	
<b><i>Identification and aspects of utility maximization</i></b>				
Identification				1,046
country of origin	5%			
both equally	44%			
country of residence	51%			
Difference in quality of nationality				1,046
difference between index values (min.: 2.6, max.: 66.9)		46.1	15.2	
<b><i>Sociodemographic characteristics and migration biography</i></b>				
Sex				1,046
male	53%			
female	47%			
Length of stay				1,046
born in Germany	26%			
<25 years of residence	52%			
≥25 years of residence	22%			
Intention to stay				1,046
no	7%			
yes	93%			

– CONTINUED –

Table A2.3: Sample characteristics  
– CONTINUED –

<b>Analysis 2</b>			
<b>Dependent variable</b>			
Desire to retain the original citizenship			361
	no	32%	
	yes	68%	
<b>Perceived barriers</b>			
Perceived as a foreigner			361
	no	39%	
	partly	21%	
	yes	40%	
Family against naturalization			361
	no	80%	
	yes	20%	
<b>Control variables</b>			
<b><i>Individual level of integration</i></b>			
Residence country language proficiency			361
	index (self-estimation): speak, read, write (min.: 1 “absolutely not”, max.: 6 “very good”)	5.1    0.9	
<b><i>Identification and aspects of utility maximization</i></b>			
Identification			361
	country of origin	10%	
	both equally	51%	
	country of residence	39%	
Subjective expectation of benefits through naturalization			361
	no	51%	
	yes	49%	
<b><i>Sociodemographic characteristics and migration biography</i></b>			
Sex			361
	male	51%	
	female	49%	
Length of stay			361
	born in Germany	23%	
	<25 years of residence	37%	
	≥25 years of residence	40%	
Intention to stay			361
	no	12%	
	yes	88%	

*Note:* SD = Standard deviation. See Table A2.1 for further information on source, operationalisation and coding. Source: 2011 BAMF Naturalisation Study.

**Table A2.4: Cluster-robust logistic regression on decision to naturalize (0=no; 1=yes) clustered by origin country**

	Odds Ratio	Robust Standard Error
<b>Legal barriers</b>		
Possibility of dual citizenship ( <i>Ref.: no</i> )	1.84*	0.53
<b>Perceived barriers</b>		
Perceived as a foreigner ( <i>Ref.: no</i> )		
partly	1,01	0.16
yes	0.75	0.12
Family against naturalization ( <i>Ref.: no</i> )	0.41**	0.13
<b>Control variables</b>		
<b><i>Individual level of integration</i></b>		
Residence country language proficiency ( <i>index</i> )	1.92**	0.42
<b><i>Identification and aspects of utility maximization</i></b>		
Identification ( <i>Ref.: country of origin</i> )		
both equally	2.62**	0.97
country of residence	3.90***	1.29
Difference in quality of nationality ( <i>index</i> )	1.06***	0.01
<b><i>Sociodemographic characteristics and migration biography</i></b>		
Sex: female ( <i>Ref.: male</i> )	0.86	0.14
Length of stay ( <i>Ref.: born in Germany</i> )		
<25 years of residence	1.20	0.23
≥25 years of residence	0.27***	0.09
Intention to stay ( <i>Ref.: no</i> )	2.11*	0.65
Constant	0.00***	0.00
N	1,046	
Prob > Chi <sup>2</sup>	0.000	

*Note:* Ref. = Reference; Level of significance: \*\*\* $p \leq 0.001$ ; \*\* $p \leq 0.01$ ; \* $p \leq 0.05$ . Standard errors adjusted for 15 clusters. See Table A2.1 for further information on source, operationalisation and coding. Source: 2011 BAMF Naturalisation Study.

**Table A2.5: Cluster-robust logistic regression on desire to retain the original citizenship (0=no; 1=yes) clustered by origin country (non-naturalized immigrants only)**

	Odds Ratio	Robust Standard Error
<b>Perceived barriers</b>		
Perceived as a foreigner ( <i>Ref.: no</i> )		
partly	1.64*	0.40
yes	1.15	0.37
Family against naturalization ( <i>Ref.: no</i> )	3.41***	1.19
<b>Control variables</b>		
<b><i>Individual level of integration</i></b>		
Residence country language proficiency ( <i>index</i> )	1.01	0.18
<b><i>Identification and aspects of utility maximization</i></b>		
Identification ( <i>Ref.: country of origin</i> )		
both equally	0.11***	0.04
country of residence	0.03***	0.02
Subjective expectation of benefits through naturaliz. ( <i>Ref.: no</i> )	1.40	0.33
<b><i>Sociodemographic characteristics and migration biography</i></b>		
Sex: female ( <i>Ref.: male</i> )	1.67	0.49
Length of stay ( <i>Ref.: born in Germany</i> )		
<25 years of residence	0.53*	0.16
≥25 years of residence	1.07	0.45
Intention to stay ( <i>Ref.: no</i> )	0.35	0.28
Constant	26.25	53.89
N	361	
Prob > Chi <sup>2</sup>	0.000	

*Note:* Ref. = Reference; Level of significance: \*\*\*p ≤ 0.001; \*\*p ≤ 0.01; \*p ≤ 0.05. Standard errors adjusted for 16 clusters. See Table A2.1 for further information on source, operationalisation and coding. Source: 2011 BAMF Naturalisation Study.

**Table A2.6: Logistic multilevel analysis on decision to naturalize (0=no; 1=yes)**

	Odds Ratio	Robust Standard Error
<b>Legal barriers</b>		
Possibility of dual citizenship ( <i>Ref.: no</i> )	2.18*	0.71
<b>Perceived barriers</b>		
Perceived as a foreigner ( <i>Ref.: no</i> )		
partly	0.96	0.16
yes	0.63**	0.11
Family against naturalization ( <i>Ref.: no</i> )	0.37**	0.14
<b>Control variables</b>		
<b><i>Individual level of integration</i></b>		
Residence country language proficiency ( <i>index</i> )	1.98***	0.39
<b><i>Identification and aspects of utility maximization</i></b>		
Identification ( <i>Ref.: country of origin</i> )		
both equally	2.75**	0.98
country of residence	3.98***	1.34
Difference in quality of nationality ( <i>index</i> )	1.07***	0.01
<b><i>Sociodemographic characteristics and migration biography</i></b>		
Sex: female ( <i>Ref.: male</i> )	0.86	0.14
Length of stay ( <i>Ref.: born in Germany</i> )		
<25 years of residence	1.33	0.28
≥25 years of residence	0.28***	0.10
Intention to stay ( <i>Ref.: no</i> )	1.97	0.73
Constant	0.00***	0.00
Origin country variance	0.26	0.12
N		1,046
Prob > Chi <sup>2</sup>		0.000

*Note:* Ref. = Reference; Level of significance: \*\*\* $p \leq 0.001$ ; \*\* $p \leq 0.01$ ; \* $p \leq 0.05$ . Standard errors adjusted for 15 clusters. See Table A2.1 for further information on source, operationalisation and coding. Source: 2011 BAMF Naturalisation Study.

**Table A2.7: Cluster-robust logistic regression on desire to retain the original citizenship (0=no; 1=yes) clustered by origin country (non-naturalized immigrants only; with control variable for dual citizenship options)**

	Odds Ratio	Robust Standard Error
<b>Perceived barriers</b>		
Perceived as a foreigner ( <i>Ref.: no</i> )		
partly	1.65*	0.38
yes	1.17	0.41
Family against naturalization ( <i>Ref.: no</i> )	3.33***	1.14
<b>Control variables</b>		
<i>Individual level of integration</i>		
Residence country language proficiency ( <i>index</i> )	1.02	0.18
<i>Identification and aspects of utility maximization</i>		
Identification ( <i>Ref.: country of origin</i> )		
both equally	0.10***	0.04
country of residence	0.03***	0.02
Subjective expectation of benefits through naturaliz. ( <i>Ref.: no</i> )	1.33	0.36
<i>Sociodemographic characteristics and migration biography</i>		
Sex: female ( <i>Ref.: male</i> )	1.70	0.50
Length of stay ( <i>Ref.: born in Germany</i> )		
<25 years of residence	0.58*	0.14
≥25 years of residence	1.10	0.44
Intention to stay ( <i>Ref.: no</i> )	0.34	0.29
<i>Dual citizenship options</i>		
Possibility of dual citizenship ( <i>Ref.: no</i> )	1.46	0.50
Constant	22.91	45.57
N	361	
Prob > Chi <sup>2</sup>	0.000	

*Note:* Ref. = Reference; Level of significance: \*\*\*p ≤ 0.001; \*\*p ≤ 0.01; \*p ≤ 0.05. Standard errors adjusted for 16 clusters. See Table A2.1 for further information on source, operationalisation and coding. Source: 2011 BAMF Naturalisation Study.

**Table A2.8: Desire to retain the original citizenship and knowledge about possibility of citizenship retention by possibility of dual citizenship (non-naturalized immigrants only)**

		Possibility of dual citizenship		
		no	yes	N
<b>Desire to retain the original citizenship</b>	no	35%	24%	361
	yes	65%	76%	
<b>Knowledge about possibility of citizenship retention</b>	I could not retain my citizenship	68%	27%	360
	I could retain my citizenship	19%	43%	
	I do not know	13%	30%	

*Note:* Questioning concerning knowledge about dual citizenship options: “Can your current citizenship be retained when you acquire German citizenship through naturalization?”. Source: 2011 BAMF Naturalisation Study.

**Table A2.9: Cluster-robust logistic regression on desire to retain the original citizenship (0=no; 1=yes) clustered by origin country (non-naturalized immigrants only; with control variable for knowledge about dual citizenship options)**

	Odds Ratio	Robust Standard Error
<b>Perceived barriers</b>		
Perceived as a foreigner ( <i>Ref.: no</i> )		
partly	1.68*	0.39
yes	1.17	0.39
Family against naturalization ( <i>Ref.: no</i> )	3.25**	1.20
<b>Control variables</b>		
<b><i>Individual level of integration</i></b>		
Residence country language proficiency ( <i>index</i> )	1.04	0.23
<b><i>Identification and aspects of utility maximization</i></b>		
Identification ( <i>Ref.: country of origin</i> )		
both equally	0.14***	0.06
country of residence	0.04***	0.02
Subjective expectation of benefits through naturaliz. ( <i>Ref.: no</i> )	1.45	0.40
<b><i>Sociodemographic characteristics and migration biography</i></b>		
Sex: female ( <i>Ref.: male</i> )	1.70	0.52
Length of stay ( <i>Ref.: born in Germany</i> )		
<25 years of residence	0.55*	0.15
≥25 years of residence	1.10	0.51
Intention to stay ( <i>Ref.: no</i> )	0.33	0.25
<b><i>Knowledge about dual citizenship options</i></b>		
Awareness of citizenship options ( <i>Ref.: aware</i> )		
unaware of retention	1.63	0.57
unaware of loss	1.55	0.78
Constant	14.97	36.91
N	360	
Prob > Chi <sup>2</sup>	0.000	

*Note:* Ref. = Reference; Level of significance: \*\*\*p ≤ 0.001; \*\*p ≤ 0.01; \*p ≤ 0.05. Standard errors adjusted for 16 clusters. See Table A2.1 for further information on source, operationalisation and coding. Awareness of citizenship options controls for whether immigrants are aware of their citizenship options (i.e. correctly know whether they would lose or be able to retain their original citizenship, 1=aware of options) or not; these are immigrants who would be able to retain and incorrectly assume they would lose their citizenship or do not know about it (2=unaware of retention) as well as immigrants who would lose and incorrectly assume they could retain their citizenship or do not know about it (3=unaware of loss). Source: 2011 BAMF Naturalisation Study.

**Table A2.10: Cluster-robust logistic regression on decision to naturalize (0=no; 1=yes) with additional variables controlling for the individual level of integration clustered by origin country**

	Model 1		Model 2	
	Odds Ratio	Robust Standard Error	Odds Ratio	Robust Standard Error
<b>Legal barriers</b>				
Possibility of dual citizenship ( <i>Ref.: no</i> )	1.92	0.64	1.99	0.74
<b>Perceived barriers</b>				
Perceived as a foreigner ( <i>Ref.: no</i> )				
partly	0.92	0.17	0.83	0.16
yes	0.71 *	0.12	0.70 *	0.12
Family against naturalization ( <i>Ref.: no</i> )	0.40 **	0.14	0.51 ***	0.09
<b>Control variables</b>				
<b>Individual level of integration</b>				
Residence country language proficiency ( <i>index</i> )	1.96 **	0.49	2.03 **	0.46
Educational attainment ( <i>Ref.: low</i> )				
medium	1.06	0.22	–	–
high	1.05	0.20	–	–
Employment ( <i>Ref.: no</i> )	–	–	1.26	0.26
<b>Identification and aspects of utility maximization</b>				
Identification ( <i>Ref.: country of origin</i> )				
both equally	2.83 **	1.14	2.29 *	1.01
country of residence	4.21 ***	1.51	3.70 ***	1.49
Difference in quality of nationality ( <i>index</i> )	1.06 ***	0.01	1.07 ***	0.01
<b>Sociodemographic characteristics and migration biography</b>				
Sex: female ( <i>Ref.: male</i> )	0.85	0.13	0.89	0.17
Length of stay ( <i>Ref.: born in Germany</i> )				
<25 years of residence	1.26	0.25	1.38	0.35
≥25 years of residence	0.28 ***	0.10	0.30 ***	0.11
Intention to stay ( <i>Ref.: no</i> )	2.11 **	0.61	2.21 **	0.58
Constant	0.00 ***	0.00	0.00 ***	0.00
N		1,017		938
Prob > Chi <sup>2</sup>		0.000		0.000

*Note:* Ref. = Reference; Level of significance: \*\*\*p ≤ 0.001; \*\*p ≤ 0.01; \*p ≤ 0.05. Standard errors adjusted for 15 clusters. See Table A2.1 for further information on source, operationalisation and coding. Source: 2011 BAMF Naturalisation Study.

**Table A2.11: Cluster-robust logistic regression on desire to retain the original citizenship (0=no; 1=yes) with additional variables controlling for the individual level of integration clustered by origin country (non-naturalized immigrants only)**

	Model 1		Model 2	
	Odds Ratio	Robust Standard Error	Odds Ratio	Robust Standard Error
<b>Perceived barriers</b>				
Perceived as a foreigner ( <i>Ref.: no</i> )				
partly	1.52	0.39	1.30	0.38
yes	1.01	0.29	0.85	0.34
Family against naturalization ( <i>Ref.: no</i> )	3.44***	1.19	3.24***	1.00
<b>Control variables</b>				
<b>Individual level of integration</b>				
Residence country language proficiency ( <i>index</i> )				
Educational attainment ( <i>Ref.: low</i> )				
medium	0.63	0.18	–	–
high	1.23	0.28	–	–
Employment ( <i>Ref.: no</i> )	–	–	1.07	0.30
<b>Identification and aspects of utility maximization</b>				
Identification ( <i>Ref.: country of origin</i> )				
both equally	0.10***	0.04	0.11***	0.05
country of residence	0.03***	0.01	0.03***	0.02
Subjective expectation of benefits through naturalization ( <i>Ref.: no</i> )	1.41	0.33	1.48	0.47
<b>Sociodemographic characteristics and migration biography</b>				
Sex: female ( <i>Ref.: male</i> )	1.66	0.54	1.65	0.47
Length of stay ( <i>Ref.: born in Germany</i> )				
<25 years of residence	0.46*	0.14	0.43**	0.14
≥25 years of residence	0.93	0.34	0.85	0.35
Intention to stay ( <i>Ref.: no</i> )	0.37	0.29	0.40	0.31
Constant	38.39	74.99	33.76	74.43
N		355		338
Prob > Chi <sup>2</sup>		0.000		0.000

Note: Ref. = Reference; Level of significance: \*\*\*p ≤ 0.001; \*\*p ≤ 0.01; \*p ≤ 0.05. Standard errors in Model 1 adjusted for 16 clusters; in Model 2 for 15 clusters. See Table A2.1 for further information on source, operationalisation and coding. Source: 2011 BAMF Naturalisation Study.

### **8.3 Appendix of Article 3**

**Supplemental materials: Advocacy Coalitions, Power and Opportunities: Policy Change in Germany's Dual Citizenship Policy Subsystem.**

**Table A3.1: Overview of legislative initiatives**

Legislative term	Date	BT-Drs.	Title	Initiative	Initiator	Requirement for consent	Objective and Content	Decision status	Government coalition	Online resource
14 1998-2002	19.01.1999	BT-Drs. 14/296	Act to promote the integration of children of foreigners living permanently in Germany	Legislative motion by an opposition party	Parliamentary group FDP	no (according to application)	Supplementing the principle of descent with the principle of territoriality (conditional ius soli); dual nationality to be avoided by an obligation to choose (option scheme) until the age of 23	withdrawn	SPD; BÜNDNIS 90/DIE GRÜNEN	<a href="https://dip.bundestag.de/vorgang/gesetz-zur-%C3%BCberlegung-der-integration-von-kindern-daerhaft-in-deutschland/103859?term=14%2F296&amp;f.ty=Vorgang&amp;rows=25&amp;pos=1&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz-zur-%C3%BCberlegung-der-integration-von-kindern-daerhaft-in-deutschland/103859?term=14%2F296&amp;f.ty=Vorgang&amp;rows=25&amp;pos=1&amp;ctx=d</a>
	16.03.1999	BT-Drs. 14/533	Law on the reform of nationality law	Legislative procedure/ Cross-party motion	Government coalition/ Parliamentary groups SPD, BÜNDNIS 90/DIE GRÜNEN, FDP	yes (according to announcement)	Supplementing the principle of descent with the principle of territoriality (conditional ius soli); dual nationality to be avoided by an obligation to choose (option scheme) until the age of 23	proclaimed		<a href="https://dip.bundestag.de/vorgang/gesetz-zur-reform-des-staatsangeh%C3%B6rigkeitsrechts-g-14019108106687?term=Staat%20angeh%C3%B6rigkeitsgesetz&amp;f.wahlperiode=14&amp;f.ty=Vorgang&amp;rows=25&amp;pos=5&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz-zur-reform-des-staatsangeh%C3%B6rigkeitsrechts-g-14019108106687?term=Staat%20angeh%C3%B6rigkeitsgesetz&amp;f.wahlperiode=14&amp;f.ty=Vorgang&amp;rows=25&amp;pos=5&amp;ctx=d</a>
	16.03.1999	BT-Drs. 14/535	Act on the New Regulation of Nationality Law	Legislative motion by an opposition party	Parliamentary group CDU/CSU	yes (according to application)	Maintaining the avoidance of multiple nationality	rejected		<a href="https://dip.bundestag.de/vorgang/gesetz-zur-neuregelung-des-staatsangeh%C3%B6rigkeitsrechts-14019109108138?term=14%2F535&amp;f.ty=Vorgang&amp;rows=25&amp;pos=1&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz-zur-neuregelung-des-staatsangeh%C3%B6rigkeitsrechts-14019109108138?term=14%2F535&amp;f.ty=Vorgang&amp;rows=25&amp;pos=1&amp;ctx=d</a>

– CONTINUED –

Table A3.1: Overview of legislative initiatives

– CONTINUED –

Legislative term	Date	BT-Drs.	Title	Initiative	Initiator	Requirement for consent	Objective and Content	Decision status	Government coalition	Online resource
16 2005-2009	20.09.2006	BT-Drs. 16/2650	Act amending the law on nationality	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	Abolition of the obligation to choose (option scheme); general acceptance of multiple nationality	rejected	CDU/CSU; SPD	<a href="https://dip.bundestag.de/ovng/ang/gesetz-zur-%C3%A4nderung-des-staatsangeh%C3%B6rigkeitsrechtes-g-ang-16093015007?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fw=1&amp;fbperiod=16&amp;fyp=Vorgang&amp;rows=25&amp;pos=4&amp;ctx=d">https://dip.bundestag.de/ovng/ang/gesetz-zur-%C3%A4nderung-des-staatsangeh%C3%B6rigkeitsrechtes-g-ang-16093015007?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fw=1&amp;fbperiod=16&amp;fyp=Vorgang&amp;rows=25&amp;pos=4&amp;ctx=d</a>
	23.04.2007	BT-Drs. 16/5065	Act on the implementation of European Union directives on residence and asylum law	Legislative procedure	Federal Government	yes (according to announcement)	General acceptance of multiple nationality for EU citizens and Swiss nationals instead of the previous principle of reciprocity	proclaimed		<a href="https://dip.bundestag.de/ovng/ang/gesetz-zur-umsetzung-aufenthalts-und-ausfuhrlicher-richtlinien-der-europ%C3%A4ischen-union/0198?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fw=1&amp;fbperiod=16&amp;fyp=Vorgang&amp;start=25&amp;rows=25&amp;pos=31&amp;ctx=d">https://dip.bundestag.de/ovng/ang/gesetz-zur-umsetzung-aufenthalts-und-ausfuhrlicher-richtlinien-der-europ%C3%A4ischen-union/0198?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fw=1&amp;fbperiod=16&amp;fyp=Vorgang&amp;start=25&amp;rows=25&amp;pos=31&amp;ctx=d</a>
	02.09.2008	BR-Drs. 647/08	Act amending the law on nationality	Contribution from federal states	Federal states of Berlin and Bremen	no (according to application)	Abolition of the obligation to choose (option scheme)	contribution rejected		<a href="https://dip.bundestag.de/ovng/ang/gesetz-zur-%C3%A4nderung-des-staatsangeh%C3%B6rigkeitsgesetzes/15628?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fw=1&amp;fbperiod=16&amp;fyp=Vorgang&amp;rows=25&amp;pos=11&amp;ctx=d">https://dip.bundestag.de/ovng/ang/gesetz-zur-%C3%A4nderung-des-staatsangeh%C3%B6rigkeitsgesetzes/15628?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fw=1&amp;fbperiod=16&amp;fyp=Vorgang&amp;rows=25&amp;pos=11&amp;ctx=d</a>
	05.05.2009	BT-Drs. 16/12849	Act to remove the obligation to choose out of nationality law	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	Abolition of the obligation to choose (option scheme)	rejected		<a href="https://dip.bundestag.de/ovng/ang/gesetz-zur-streichung-des-option-sow-ang-aus-dem-staatsangeh%C3%B6rigkeitsrecht/07785?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fw=1&amp;fbperiod=16&amp;fyp=Vorgang&amp;rows=25&amp;pos=2&amp;ctx=d">https://dip.bundestag.de/ovng/ang/gesetz-zur-streichung-des-option-sow-ang-aus-dem-staatsangeh%C3%B6rigkeitsrecht/07785?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fw=1&amp;fbperiod=16&amp;fyp=Vorgang&amp;rows=25&amp;pos=2&amp;ctx=d</a>

– CONTINUED –

Table A3.1: Overview of legislative initiatives

– CONTINUED –

Legislative term	Date	BT-Drs.	Title	Initiative	Initiator	Requirement for consent	Objective and Content	Decision status	Government coalition	Online resource
17 2009-2013	27.01.2010	BT-Drs. 17/542	Act to remove the obligation to choose out of nationality law	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	Abolition of the obligation to choose (option scheme)	rejected	CDU/CSU; FDP	<a href="https://dip.bundestag.de/vorgang/gesetz-zur-streichung-des-optionzwangs-aus-dem-staatsangeh%C3%B6rigkeitsrecht/24438?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwahlperiode=17&amp;ftyp=Vorgan g&amp;rows=25&amp;page=15&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz-zur-streichung-des-optionzwangs-aus-dem-staatsangeh%C3%B6rigkeitsrecht/24438?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwahlperiode=17&amp;ftyp=Vorgan g&amp;rows=25&amp;page=15&amp;ctx=d</a>
	23.02.2010	BT-Drs. 17/773	Act amending the law on nationality	Legislative motion by an opposition party	Parliamentary group SPD	yes (according to application)	Abolition of the obligation to choose (option scheme); general acceptance of multiple nationality	rejected		<a href="https://dip.bundestag.de/vorgang/gesetz-zur-%C3%Aenderung-des-staatsangeh%C3%B6rigkeitsrechts/24486?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwahlperiode=17&amp;ftyp=Vorgang&amp;rows=25&amp;page=16&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz-zur-%C3%Aenderung-des-staatsangeh%C3%B6rigkeitsrechts/24486?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwahlperiode=17&amp;ftyp=Vorgang&amp;rows=25&amp;page=16&amp;ctx=d</a>
	12.03.2010	BR-Drs. 142/10	Act amending the law on nationality	Contribution from federal states	Federal states of Berlin, Brandenburg, Bremen	no (according to application)	Abolition of the obligation to choose (option scheme)	contribution rejected		<a href="https://dip.bundestag.de/vorgang/gesetz-zur-%C3%Aenderung-des-staatsangeh%C3%B6rigkeitsgesetzes/2488?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwahlperiode=17&amp;ftyp=Vorgang&amp;rows=25&amp;page=3&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz-zur-%C3%Aenderung-des-staatsangeh%C3%B6rigkeitsgesetzes/2488?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwahlperiode=17&amp;ftyp=Vorgang&amp;rows=25&amp;page=3&amp;ctx=d</a>
	26.10.2010	BT-Drs. 17/3411	Act amending the law on nationality	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	Abolition of the obligation to choose (option scheme); general acceptance of multiple nationality	rejected		<a href="https://dip.bundestag.de/vorgang/gesetz-zur-%C3%Aenderung-des-staatsangeh%C3%B6rigkeitsrechts/30468?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwahlperiode=17&amp;ftyp=Vorgang&amp;rows=25&amp;page=2&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz-zur-%C3%Aenderung-des-staatsangeh%C3%B6rigkeitsrechts/30468?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwahlperiode=17&amp;ftyp=Vorgang&amp;rows=25&amp;page=2&amp;ctx=d</a>

– CONTINUED –

Table A3.1: Overview of legislative initiatives

– CONTINUED –

Legislative term	Date	BT-Drs.	Title	Initiative	Initiator	Requirement for consent	Objective and Content	Decision status	Government coalition	Online resource
	08.09.2011	BR-Drs. 538/11	Act amending the law on nationality	Contribution from federal states	Federal states of Baden-Württemberg, Berlin, Brandenburg, Nordrhein-Westfalen, Rheinland-Pfalz, Bremen, Hamburg	yes (according to application)	Abolition of the obligation to choose (option scheme)	contribution rejected		<a href="https://tip.bundestag.de/vorgang/gesetz/znr=382137;term=Staatsanhang%2C3%Aenderung-des-gesetz/382137;term=Staatsanhang%2C3%BF6rfolgigesetz&amp;fwhlperiode=17&amp;fwp=Vorgang&amp;rows=25&amp;pos=1&amp;ctx=nd">https://tip.bundestag.de/vorgang/gesetz/znr=382137;term=Staatsanhang%2C3%Aenderung-des-gesetz/382137;term=Staatsanhang%2C3%BF6rfolgigesetz&amp;fwhlperiode=17&amp;fwp=Vorgang&amp;rows=25&amp;pos=1&amp;ctx=nd</a>
	31.05.2013	BR-Drs. 461/13	Law on the admission of multiple nationality and the abolition of the obligation to choose in the nationality law	Contribution from federal states	Federal states of Baden-Württemberg, Rheinland-Pfalz, Brandenburg, Bremen, Hamburg, Niedersachsen, Nordrhein-Westfalen, Schleswig-Holstein	yes (according to application)	Abolition of the obligation to choose (option scheme); general acceptance of multiple nationality	done by expiry of the term of office		<a href="https://tip.bundestag.de/vorgang/gesetz/382137;term=Staatsanhang%2C3%BF6rfolgigesetz&amp;fwhlperiode=17&amp;fwp=Vorgang&amp;rows=25&amp;pos=17&amp;ctx=nd">https://tip.bundestag.de/vorgang/gesetz/382137;term=Staatsanhang%2C3%BF6rfolgigesetz&amp;fwhlperiode=17&amp;fwp=Vorgang&amp;rows=25&amp;pos=17&amp;ctx=nd</a>

– CONTINUED –

Table A3.1: Overview of legislative initiatives

– CONTINUED –

Legislative term	Date	BT-Drs.	Title	Initiative	Initiator	Requirement for consent	Objective and Content	Decision status	Government coalition	Online resource
18 2017	16.12.2013	BT-Drs. 18/185	Act amending the law on nationality	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	Abolition of the obligation to choose (option scheme)	rejected	CDU/CSU; SPD	<a href="https://dip.bundestag.de/org/ing/gesetz/znr-%3%A4nderung-des-staatsangeh%C3%B6rigkeitsgesetzes/66723?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;wahlperiode=18&amp;typ=Votrang&amp;rows=25&amp;pos=2&amp;ctx=nd">https://dip.bundestag.de/org/ing/gesetz/znr-%3%A4nderung-des-staatsangeh%C3%B6rigkeitsgesetzes/66723?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;wahlperiode=18&amp;typ=Votrang&amp;rows=25&amp;pos=2&amp;ctx=nd</a>
	05.03.2014	BR-Drs. 90/14	Law on the abolition of the obligation to choose	Contributio n from federal states	Federal states of Rheinland-Pfalz, Baden-Württemberg, Schleswig-Holstein	yes (according to application)	Abolition of the obligation to choose (option scheme)	assigned to the committees		<a href="https://dip.bundestag.de/org/ing/gesetz/znr-%3Aber-die-aufhebung-dor-optionsangabing-in-staatsangeh%C3%B6rigkeitsrech/5837?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;wahlperiode=18&amp;typ=Votrang&amp;start=25&amp;rows=25&amp;pos=32&amp;ctx=nd">https://dip.bundestag.de/org/ing/gesetz/znr-%3Aber-die-aufhebung-dor-optionsangabing-in-staatsangeh%C3%B6rigkeitsrech/5837?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;wahlperiode=18&amp;typ=Votrang&amp;start=25&amp;rows=25&amp;pos=32&amp;ctx=nd</a>
	05.05.2014	BT-Drs. 18/1312	Second Act amending the Citizenship Act	Legislative procedure	Federal Government	no (according to announcement)	Extensive abolition of the obligation to choose (option scheme)	proclaimed		<a href="https://dip.bundestag.de/org/ing/zweitegesetz/znr-%3AÄnderung-des-staatsangeh%C3%B6rigkeitsgesetzes/59439?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;wahlperiode=18&amp;typ=Votrang&amp;rows=25&amp;pos=1&amp;ctx=nd">https://dip.bundestag.de/org/ing/zweitegesetz/znr-%3AÄnderung-des-staatsangeh%C3%B6rigkeitsgesetzes/59439?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;wahlperiode=18&amp;typ=Votrang&amp;rows=25&amp;pos=1&amp;ctx=nd</a>
	15.04.2015	BT-Drs. 18/4612	Act on the realization of birthright citizenship in nationality law	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	Introduction of the principle of territoriality (not conditional)	done by expiry of the term of office		<a href="https://dip.bundestag.de/org/ing/gesetz/znr-verwirklichung-des-geburtsrechts-im-staatsangeh%C3%B6rigkeitsrech/6625?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;wahlperiode=18&amp;typ=Votrang&amp;start=25&amp;rows=25&amp;pos=27&amp;ctx=nd">https://dip.bundestag.de/org/ing/gesetz/znr-verwirklichung-des-geburtsrechts-im-staatsangeh%C3%B6rigkeitsrech/6625?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;wahlperiode=18&amp;typ=Votrang&amp;start=25&amp;rows=25&amp;pos=27&amp;ctx=nd</a>

– CONTINUED –

Table A3.1: Overview of legislative initiatives

– CONTINUED –

Legislative term	Date	BT-Drs.	Title	Initiative	Initiator	Requirement for consent	Objective and Content	Decision status	Government coalition	Online resource
	23.07.2015	BT-Drs. 18/5631	Act to facilitate naturalization and to enable multiple citizenship	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	General acceptance of multiple nationality	done by expiry of the term of office		<a href="https://dip.bundestag.de/vorgang/gesetz/erleichterung-der-einw%3%BC%20einw%3%BC%20mehrfachen/6288?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwhlperiode=18&amp;fyp=Vorgang&amp;start=25&amp;rows=25&amp;pos=3&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz/erleichterung-der-einw%3%BC%20einw%3%BC%20mehrfachen/6288?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwhlperiode=18&amp;fyp=Vorgang&amp;start=25&amp;rows=25&amp;pos=3&amp;ctx=d</a>
	04.04.2017	BT-Drs. 18/11854	Law on the introduction of an immigration law	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	Introduction of the principle of territoriality (not conditional); general acceptance of multiple nationality	done by expiry of the term of office		<a href="https://dip.bundestag.de/vorgang/gesetz/einw%3%BC%20hrung-einw%3%BC%20anderungs-gesetz/8067?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwhlperiode=18&amp;fyp=Vorgang&amp;start=25&amp;rows=25&amp;pos=3&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz/einw%3%BC%20hrung-einw%3%BC%20anderungs-gesetz/8067?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwhlperiode=18&amp;fyp=Vorgang&amp;start=25&amp;rows=25&amp;pos=3&amp;ctx=d</a>
19 2017-2021	14.12.2018	BT-Drs. 19/6542	Law on the introduction of an immigration law	Legislative motion by an opposition party	Parliamentary group BÜNDNIS 90/DIE GRÜNEN	no (according to application)	Introduction of the principle of territoriality (not conditional); general acceptance of multiple nationality	rejected	CDU/CSU; SPD	<a href="https://dip.bundestag.de/vorgang/gesetz/einw%3%BC%20hrung-einw%3%BC%20anderungs-gesetz/24264?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwhlperiode=19&amp;fyp=Vorgang&amp;rows=25&amp;pos=24&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz/einw%3%BC%20hrung-einw%3%BC%20anderungs-gesetz/24264?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwhlperiode=19&amp;fyp=Vorgang&amp;rows=25&amp;pos=24&amp;ctx=d</a>
20 2021-	08.09.2023	BT-Drs. 20/9044	Act on the modernization of citizenship law (StARModG)	Legislative procedure	Federal Government	no (according to announcement)	General acceptance of multiple nationality for EU citizens and Swiss nationals instead of the previous principle of reciprocity	proclaimed	SPD; BÜNDNIS 90/DIE GRÜNEN; FDP	<a href="https://dip.bundestag.de/vorgang/gesetz/modernisierung-des-staatsangeh%C3%B6rigkeits-starmodg/203313?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwhlperiode=20&amp;fyp=Vorgang&amp;rows=25&amp;pos=3&amp;ctx=d">https://dip.bundestag.de/vorgang/gesetz/modernisierung-des-staatsangeh%C3%B6rigkeits-starmodg/203313?term=Staatsangeh%C3%B6rigkeitsgesetz&amp;fwhlperiode=20&amp;fyp=Vorgang&amp;rows=25&amp;pos=3&amp;ctx=d</a>

Note: abbreviations: BT-Drs. = Bundestagsdrucksache (Bundestag printed paper); BR-Drs. = Bundesratsdrucksache (Bundesrat printed paper)

**Table A3.2: Overview of plenary protocols**

Legislative term	Date	Plenary protocol	Constitutional body	Plenary session	Legislative procedure	Pages	Government Coalition	Online resource
<b>14 1998-2002</b>	19.03.1999	Plenary protocol 14/28	Deutscher Bundestag	28 <sup>th</sup> session	1 <sup>st</sup> reading	2281-2319	SPD; BÜNDNIS 90 / DIE GRÜNEN	<a href="https://dserver.bundestag.de/btp/14/14028.pdf#P.2281">https://dserver.bundestag.de/btp/14/14028.pdf#P.2281</a>
	07.05.1999	Plenary protocol 14/40	Deutscher Bundestag	40 <sup>th</sup> session	2 <sup>nd</sup> +3 <sup>rd</sup> reading	3415-3462		<a href="https://dserver.bundestag.de/btp/14/14040.pdf#P.3415">https://dserver.bundestag.de/btp/14/14040.pdf#P.3415</a>
	21.05.1999	Plenary protocol 738	Deutscher Bundesrat	738 <sup>th</sup> session	reading	181-192		<a href="https://dserver.bundestag.de/brp/738.pdf#P.181">https://dserver.bundestag.de/brp/738.pdf#P.181</a>
<b>18 2013-2017</b>	23.05.2014	Plenary protocol 922	Deutscher Bundesrat	922 <sup>th</sup> session	1 <sup>st</sup> reading	124-129	CDU/CSU; SPD	<a href="https://dserver.bundestag.de/brp/922.pdf#P.127">https://dserver.bundestag.de/brp/922.pdf#P.127</a>
	05.06.2014	Plenary protocol 18/39	Deutscher Bundestag	39 <sup>th</sup> session	1 <sup>st</sup> reading	3336-3356		<a href="https://dserver.bundestag.de/btp/18/18039.pdf#P.3336">https://dserver.bundestag.de/btp/18/18039.pdf#P.3336</a>
	03.07.2014	Plenary protocol 18/46	Deutscher Bundestag	46 <sup>th</sup> session	2 <sup>nd</sup> +3 <sup>rd</sup> reading	4183-4195		<a href="https://dserver.bundestag.de/btp/18/18046.pdf#P.4183">https://dserver.bundestag.de/btp/18/18046.pdf#P.4183</a>
	19.09.2014	Plenary protocol 925	Deutscher Bundesrat	925 <sup>th</sup> session	2 <sup>nd</sup> reading	284-285		<a href="https://dserver.bundestag.de/brp/925.pdf#P.284">https://dserver.bundestag.de/brp/925.pdf#P.284</a>
	20.10.2023	Plenary protocol 1037	Deutscher Bundesrat	1037 <sup>th</sup> session	1 <sup>st</sup> reading	338-341	SPD; BÜNDNIS 90 / DIE GRÜNEN; FDP	<a href="https://dserver.bundestag.de/brp/1037.pdf#P.338">https://dserver.bundestag.de/brp/1037.pdf#P.338</a>
<b>20 2021-2025</b>	30.11.2023	Plenary protocol 20/141	Deutscher Bundestag	141 <sup>th</sup> session	1 <sup>st</sup> reading	17807-17826		<a href="https://dserver.bundestag.de/btp/20/20141.pdf#P.17807">https://dserver.bundestag.de/btp/20/20141.pdf#P.17807</a>
	19.01.2024	Plenary protocol 20/148	Deutscher Bundestag	148 <sup>th</sup> session	2 <sup>nd</sup> +3 <sup>rd</sup> reading	18921-18936		<a href="https://dserver.bundestag.de/btp/20/20148.pdf#P.18921">https://dserver.bundestag.de/btp/20/20148.pdf#P.18921</a>
	02.02.2024	Plenary protocol 1041	Deutscher Bundesrat	1041 <sup>th</sup> session	2 <sup>nd</sup> reading	5-9		<a href="https://dserver.bundestag.de/brp/1041.pdf#P.5">https://dserver.bundestag.de/brp/1041.pdf#P.5</a>

## Annex A3.1: Overview of press interviews, press coverages and additional documents

### Press interviews and press coverages

- Der Tagesspiegel. 2008. "Einbürgerung: Schäuble gegen Doppelpass-Pläne der SPD"; press coverage from 10 July 2008, <https://www.tagesspiegel.de/politik/schauble-gegen-doppelpass-plane-der-spd-1672921.html> (last access: 09.04.2025).
- . 2014. "Doppelte Staatsbürgerschaft erleichtern"; interview with Thomas de Maizière from 9 February 2014, <https://www.bundesregierung.de/breg-de/aktuelles/doppelte-staatsbuergerschaft-erleichtern-638316> (last access: 09.04.2025).
- . 2016. "Thomas de Maizière zur Flüchtlingspolitik: 'Niemand hat gesagt, wir schaffen das mit Links'"; interview with Thomas de Maizière from 14 August 2016, <https://www.tagesspiegel.de/politik/niemand-hat-gesagt-wir-schaffen-das-mit-links-6312436.html> (last access: 09.04.2025).
- . 2023. "FDP-Fraktionschef zur Migrationspolitik: 'Es wird Menschen geben, die hier scheitern'"; interview with Christian Dürr from 11 January 2023, <https://www.tagesspiegel.de/politik/fdp-migrationspolitik-es-wird-menschen-geben-die-hier-scheitern-9157554.html> (last access: 09.04.2025).
- Deutsche Welle. 2016. "CDU votes to scrap dual nationality reform"; press coverage from 7 December 2016, <https://www.dw.com/en/cdu-defies-merkel-with-hardline-dual-nationality-vote/a-36684868> (last access: 09.04.2025).
- Deutschlandfunk Archiv. 1999a. "Interview Koch"; interview with Roland Koch from 5 January 1999 from the Deutschlandfunk archive, <https://www.deutschlandfunk.de/doppelte-staatsbuergerschaft-100.html> (last access: 09.04.2025).
- . 1999b. "Interview Huber"; interview with Erwin Huber from 6 January 1999 from the Deutschlandfunk archive, <https://www.deutschlandfunk.de/die-unionskampagne-gegen-die-doppelte-staatsbuergerschaft-100.html> (last access: 09.04.2025).
- . 1999c. "Interview Schäuble"; interview with Wolfgang Schäuble from 11 January 1999 from the Deutschlandfunk archive, <https://www.deutschlandfunk.de/doppelte-staatsbuergerschaft-foerdert-nicht-die-integration-100.html> (last access: 09.04.2025).
- . 1999d. "Interview Schily"; interview with Otto Schily from 24 January 1999 from the Deutschlandfunk archive, <https://www.deutschlandfunk.de/schily-102.html> (last access: 09.04.2025).
- . 2022. "Erleichterte Einbürgerung. Innenministerin Faeser (SPD): 'Es geht darum, dass wir uns als Einwanderungsland begreifen'"; interview with Nancy Faeser from 1 December 2022 from the Deutschlandfunk archive, <https://www.deutschlandfunk.de/einbuergierung-fachkraefte-nancy-faeser-bundesinnenministerin-100.html> (last access: 09.04.2025).
- Merkur. 2013. "Innenminister bleibt bei Nein zum Doppelpass"; press coverage from 28 April 2013, <https://www.merkur.de/politik/friedrich-bleibt-striktem-nein-doppelter-staatsbuergerschaft-zr-2878204.html> (last access: 09.04.2025).
- Spiegel Archiv. 1999. "Schlagende Herzen und brennende Seelen. Die Polit-Zitate des Jahres"; press coverage from the Spiegel archive, <https://www.spiegel.de/politik/deutschland/schlagende-herzen-und-brennende-seelen-die-polit-zitate-des-jahres-a-57937.html> (last access: 09.04.2025).
- . 2016. "Kampagne gegen den Doppelpass. Roland Koch Im Jahr 1999"; press coverage from the Spiegel archive, <https://www.spiegel.de/fotostrecke/roland-koch-kampagne-gegen-den-doppelpass-fotostrecke-143391.html> (last access: 09.04.2025).
- Spiegel Online. 2009. "Schäuble zum Integrationsdebakel 'Multikulti ist keine Lösung'"; interview with Wolfgang Schäuble from 25 January 2009, <https://www.spiegel.de/politik/deutschland/schaeuble-zum-integrationsdebakel-multikulti-ist-keine-loesung-a-603306.html> (last access: 09.04.2025).
- Süddeutsche Zeitung. 2016. "Hasselfeldt: Für Burka-Verbot"; press coverage from 1 August 2016, <https://www.sueddeutsche.de/politik/hasselfeldt-fuer-burka-verbot-1.3103388> (last access: 09.04.2025).
- Tagesschau. 2023. "Gesetzentwurf der Innenministerin: FDP fordert höhere Hürden für Einbürgerung"; press coverage from 3 March 2023, <https://www.tagesschau.de/inland/innenpolitik/fdp-fachkraefteeinwanderungsgesetz-101.html> (last access: 09.04.2025).

### Additional documents

- BAGFW. 2012. "Die Optionspflicht in der Beratungsarbeit." [https://www.bagfw.de/fileadmin/user\\_upload/Veroeffentlichungen/Publikationen/2012\\_07\\_01\\_Optionspflicht\\_der\\_Beratungsarbeit.pdf](https://www.bagfw.de/fileadmin/user_upload/Veroeffentlichungen/Publikationen/2012_07_01_Optionspflicht_der_Beratungsarbeit.pdf).
- Bündnis 90/Die Grünen. 2021. "Deutschland. Alles ist drin. Bundestagswahlprogramm 2021." [https://cms.gruene.de/uploads/assets/2021\\_Wahlprogrammmentwurf.pdf](https://cms.gruene.de/uploads/assets/2021_Wahlprogrammmentwurf.pdf).
- CDU, CSU, and SPD. 2013. "Deutschlands Zukunft Gestalten. Koalitionsvertrag Zwischen CDU, CSU Und SPD. 18. Legislaturperiode." <https://archiv.cdu.de/sites/default/files/media/dokumente/koalitionsvertrag.pdf>.
- CDU, CSU. 2025. "Politikwechsel für Deutschland Wahlprogramm von CDU und CSU." <https://www.politikwechsel.cdu.de/sites/www.politikwechsel.cdu.de/files/docs/politikwechsel-fuer-deutschland-wahlprogramm-von-cdu-csu-1.pdf>.
- Deutscher Bundestag. 2003. "Beschlussempfehlung und Bericht des Innenausschusses (4. Ausschuss), 07.05.2003, BT-Drs. 15/955." <https://dserv.bundestag.de/btd/15/009/1500955.pdf>.
- Deutscher Bundestag. 2010. "Webarchiv - Innenausschuss - 09.02.2010: De Maizière hält gesetzgeberische Aktivitäten bei Optionspflicht für verfrüht." [https://webarchiv.bundestag.de/archive/2012/0514/presse/hib/2010\\_02/2010\\_034/02.html](https://webarchiv.bundestag.de/archive/2012/0514/presse/hib/2010_02/2010_034/02.html).
- FDP. 2013. "Bürgerprogramm 2013. Damit Deutschland stark bleibt." <https://fdp-hessen.de/wp-content/uploads/2015/08/2013-BTW-Programm.pdf>.
- FDP. 2021. "Nie gab es mehr zu tun. Wahlprogramm der Freien Demokraten." <https://www.fdp.de/nie-gab-es-mehr-zu-tun>.
- SPD, Bündnis 90/Die Grünen, and FDP. 2021. "Koalitionsvertrag 2021-2025. Mehr Fortschritt wagen." [https://www.spd.de/fileadmin/Dokumente/Koalitionsvertrag/Koalitionsvertrag\\_2021-2025.pdf](https://www.spd.de/fileadmin/Dokumente/Koalitionsvertrag/Koalitionsvertrag_2021-2025.pdf).
- SPD-Parteivorstand. 2021. "Das Zukunftsprogramm der SPD." [https://www.portal-sozialpolitik.de/uploads/sopo/pdf/2021/2021-05-10\\_Programm\\_20\\_WP\\_SPD.pdf](https://www.portal-sozialpolitik.de/uploads/sopo/pdf/2021/2021-05-10_Programm_20_WP_SPD.pdf).
- SVR. 2013. "SVR schlägt modernes Staatsangehörigkeitsrecht vor: Doppelpass mit Generationenschnitt; Press Statement from 1 November 2013." <https://www.svr-migration.de/presse/svr-schlaegt-modernes-staatsangehoerigkeitsrecht-vor-doppelpass-mit-generationenschnitt/>.