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## Multiple citizenship, multiple dilemmas

### Description

***In recent decades multiple citizenship has become widely accepted in democratic states. The earlier blanket rejection of multiple citizenship has disappeared, and today a growing number of sovereign states tolerate some form of multiple citizenship.***

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Both the explicit renunciation of former citizenship at naturalization and the withdrawal of citizenship at nationalization in another state are rather exceptional in the developed world. While Western states for long considered dual citizenship as an unacceptable violation of state sovereignty, the emerging consensus is that dual citizenship does not any longer threaten interstate relations.<sup>[1]</sup>



### A universal human right?

Former political membership, which in the past was seen as a legal bond creating and validating the loyalty of an individual towards a political unit is today not considered to be a unitary and exclusive relationship. As Peter Spiro put it, *“nationality no longer defines individual identities in the way that it used to, and perhaps nations can no longer jealously demand that their membership remain a monogamous one”*.<sup>[2]</sup>

The reasons for the desecuritization of multiple citizenship are manifold. Most importantly, changing patterns of migration was one of the main reasons for shifts in dual citizenship policies. Postwar economic development required cheap labor. Attracting guest workers from the third world was the obvious measure for many first world economies to improve economic output. Guest workers were often considered to stay for a limited period only. But as their stays extended, it became apparent that without citizenship status they have to face severe economic, political and social disadvantages. But as many migrants had no possibility or willingness to renounce their original citizenship, migrant receiving states started to tolerate dual citizenship in the hope of strengthening the integration of the newcomers.

Another factors that contributed to the proliferation of multiple citizenship were the international treaties on abandoning double taxation; the cancellation of conscription; the introduction of gender neutral transmission of citizenship; the emergence of human rights norms; and the internationalization of conflict resolution.

Leading scholars in citizenship studies have recently argued that the growing acceptance of multiple citizenship is a sign of transnational political integration. Many hope that the proliferation of dual-citizenship policies and the increasing number of multiple citizens pave the way to a post-national order, where national belonging and citizenship will have neither material, nor symbolic relevance.

According to these views, greater tolerance of dual citizenship shows that national citizenship is losing

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its political, legal, economic, social, and symbolic relevance. Leading scholars in the field argue that the growing acceptance of dual citizenship indicates the decline of the nation-state and the dawn of the post-national and/or transnational order. *Dual citizenship could thus be envisaged as a bridge between national and supranational citizenship*<sup>[3]</sup>.

Others predict that the proliferation of dual citizenship will promote the emergence of a global community where *citizenship will be fundamentally more fluid and transnational*<sup>[4]</sup>. It is also argued that dual citizenship in Western liberal countries is a harbinger of *fluidity of membership*<sup>[5]</sup> which *breaks with the logic and practice of national state citizenship*<sup>[5]</sup>, and by doing so, it helps *to overcome antiquated notions of state sovereignty and national homogeneity*<sup>[6]</sup>. According to these interpretations, multiple citizenship loosens the political, the legal, and also the symbolic relationship between the state and the individual by *foreboding of cosmopolitan citizenship*<sup>[7]</sup>.

### A tool for influence

But can one make such universalizing statements on dual citizenship based on purely on the experience of migrant receiving countries? The above approaches that interpret the growing toleration of multiple citizenship as a sign of post/denational tendencies do not take into account that dual citizenship *either offered to immigrants or to external ethnic kins* is meant to strengthen links between a specific state and an individual. In these cases, dual citizenship serves traditional nationalizing aims by the inclusion of the members of the migrant diasporas and transborder ethnic kin-minorities.

Though the toleration of dual citizenship does not usually involve credible security concerns in migrant receiving countries, the situation is very different in the case of transborder ethnic minorities. Non-resident citizenship may well be used for exercising influence across their borders. If this happens, dual citizenship may legitimately be seen as an infringement upon state sovereignty.

The 2008 armed conflict over South Ossetia between Russia and Georgia indicates that dual-citizenship policies may serve territorial interests. Russia first issued citizenship to former citizens of the Soviet Union living in the newly independent republics following a fully civic conception of citizenship: membership was offered regardless of ethnic ties to the Russian nation. People from the South Ossetian autonomous territory, who wanted to be part of the Russian pension system, applied. When Moscow sent troops to Georgia, President Dmitri Medvedev claimed that Russia was obliged to protect its citizens in South Ossetia from the abuses of the Georgian state.

It is no surprise that since the war former Soviet republics have become wary of Russian dual citizens. Ukraine, for example, banned dual citizenship, fearing that Russia may at some point intervene in the name of its citizens.

In addition to the possibility of conflicts over territorial sovereignty, offering dual citizenship for external kin-minorities is problematic from the perspective of popular sovereignty too. With the termination of conscription, the price of acquiring citizenship decreased significantly. Citizenship today has no cost, but entails a lot of possible benefits. The most obvious are political rights. According to the estimations of *Voting from Abroad: The International IDEA Handbook*<sup>[8]</sup>, a comparative analysis of external voting practices, the number of individuals eligible to take part in external voting has doubled since 1970<sup>[8]</sup>, and as many as 190 million individuals in 115 states temporarily or permanently away from their home countries were entitled to vote in elections as of May 2007. Such electoral groups may

easily be mobilized by parties who want to stay in power. Extending citizenship for external kins is always a possible way to influence electoral proportions.

In the past years, there have been a couple of elections in Europe in which the votes from non-resident electorates have proven to be decisive. Thanks to the external votes and to the inability of right-wing parties to form an electoral coalition, in the 2006 Italian elections the centre-left forces led by Romano Prodi could secure a thin majority in the Senate and form a new coalition government. External votes helped the nationalist party of Franjo Tudjman to stay in power in Croatia all throughout the 1990's. Though the Romanian external dual citizens in Moldova amounts only to a very small percentage of the total eligible voters in Romania, the external votes from Moldovan Romanians in the December 2009 presidential elections were also seen to be decisive. Without the overwhelming support of Romanian dual citizens in Moldova, incumbent president Traian Basescu would have lost office.

Furthermore, dual citizenship offered for third-country citizens by various EU member states raises another novel dilemma. In the 15 old EU member states, 7 countries apply preferential rules for those with cultural affinity toward the country in question (Denmark, France, Germany, Greece, Ireland, Portugal, and Spain). Most of these advantages target ethnic diasporas or descendants of former or deceased nationals abroad, who may apply for citizenship without residence in the country of their ancestors. Preference for nationals of certain states exists for lusophones in Portugal, for nationals of specific Latin-American countries in Spain, and for certain East and Central European German-speaking minorities in Germany.

Except for Estonia and the Czech Republic, preferential naturalization policies are also present in all the Central and Eastern European member states<sup>[9]</sup>. As critics note, these states "open back doors" to the EU by generously handing out citizenship to many third-country nationals, who may move and work in any of the EU member states.

This, however, does not mean that multiple citizenship should never be seen as a legitimate and reasonable institution. Multiple citizenship serves normatively compelling and politically valid aims in the case of social and political integration of migrants. But as the above-mentioned examples show, dual citizenship offered for external kin-minorities may also contribute to nationalist and culturalist tendencies, may violate basic principles of democratic equality, and may occasionally lead to international tension. Regarding multiple citizenship as a human right is not only a misunderstanding of current practices, but may also support illiberal and undemocratic initiatives.

#### Notes :

[1] This essay is the brief summary of Szabolcs Pogonyi's Dual Citizenship and Sovereignty ( *Nationalities Papers*, 2011. 9.)

[2] Quoted in: Spiro, Peter J. "Dual Citizenship, Birthright Citizenship, and the Meaning of Sovereignty. Hearing before the Subcommittee on Immigration, Border Security, and Claims of the Committee on the Judiciary House of Representatives." 2006. Web. 24. Feb. 2011.

[3] Quoted in: Faist, Thomas, Jürgen Gerdes, and Beate Rieple. "Dual citizenship as a path-dependent process" *International Migration Review*, 37.4 (2004): 913-944.

[4] Quoted in: Rubenstein, Kim. "Citizenship in a Borderless World." *Legal Visions of the 21st Century. Essays in Honour of Judge Christopher Weeramantry*. Ed. Antony Anghie and Gary Sturgess. The Hague: Kluwer Law International, 1998. 183-206.

[5] Quoted in: Feldblum, Miriam. "Reconfiguring Citizenship in Europe." *Challenge to the Nation-State. Immigration in Western Europe and the United States*.

Â Ed. Christian Joppke Oxford: Oxford UP, 1988. 231-271.

[6] Quoted in: BaubÃ¶ck, Rainer. â??The Trade-off Between Transnational Citizenship and Political Autonomy. Thomas Faist and Peter Kivisto,Â *Dual Citizenship in Global Perspective: From Unitary to Multiple Citizenship*, Basingstoke: Palgrave Macmillan, 2007, 69-91.

[7] Quoted in: Itzigsoh, JosÃ©. â??Migration and Transnational Citizenship in Latin Marica: The Cases of Mexico and the Dominican Republic.â?• Ed. Thomas Faist and Peter Kivisto.Â*From Unitary to Multiple Citizenship*, Houndmills (UK): Palgrave Macmillan, 2007, 113-134.

[8]Quoted in: Braun, Nadja & Gratschew, Maria. â??Introduction.â?• In â??Voting form Abroad. The International IDEA Handbookâ?•. 2007. Web. Feb. 24, 2011.

[9]On this issue, see: Pogonyi, Szabolcs, MÃ¡ria KovÃ¡cs and Zsolt KÃ¡rtvÃ©lyesi. â??The Politics of External Kin-State Citizenship in East Central Europe.â?•Â*EUDO-Citizenship*. 2010. Web. 24. Feb. 2011.

### **Complementary reference :**

Brubaker, Rogers. *Nationalism Reframed: Nationhood and the National Question in the New Europe*. Cambridge: Cambridge University Press, 1996.

### [Translation in French.](#)

**Photograph** :Â Â«Â Mother GeorgiaÂ Â», Tbilissi (SÃ©bastien Gobert, August 2011)

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**date crÃ©Ã©e**

15/12/2011

**Champs de MÃ©ta**

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