

## Chapter 5

# Strategic Dual Citizenship: Global Dynamics of Supply and Demand

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### Abstract

The growing toleration of dual citizenship changes the basic rules governing citizenship attribution. It creates new possibilities for legal connections between states and individuals, including overlapping memberships and belonging from a distance. In this chapter, I argue that the legitimisation of dual citizenship leads to the adoption of strategic policies on the part of states (the “supply” side) as well as on the part of eligible individuals (the “demand” side). Numerous states use dual citizenship policies to select new citizens that do not live on their territory and do not intend to relocate or give up their original citizenship. These include the descendants of emigrants (e.g. Italian descendants in South America who are now offered Italian citizenship), cross-border co-ethnics (such as ethnic Hungarians in the countries surrounding Hungary), as well as millionaires from developing countries who can now – for a hefty sum – acquire citizenship from a country where they have never set foot. From the perspective of eligible individuals, such schemes offer opportunities to strategically expand their scope of rights and opportunities by acquiring a second citizenship that is ranked higher in the global hierarchy of citizenship value. The expected benefits may include global travel freedom, an insurance policy and broader economic opportunities. These developments, which impact both states and individuals, weaken the traditional association between citizenship and national identity.

### 1. Introduction

Tolerance of dual citizenship has become the global norm since the 1990s. Historically, the idea that an individual could belong to two countries was perceived as an anomaly, even an abomination. In recent years, however, dozens of countries have revised their citizenship laws to permit it. To understand these legal changes more fully, we need to go behind the laws and inquire about the political and economic conditions that led governments to legitimise – and even encourage – dual citizenship and about the incentives that drive individuals to seek it.

In this chapter, I argue that governments and individuals have used dual citizenship strategically. Dual-citizenship policies expand the boundaries of the nation to include populations who are perceived as having potential value, which may be symbolic, electoral, demographic, territorial or economic. From the perspective of individuals, a key

motivation for acquiring dual citizenship is the wish to benefit from the additional rights and security that accrue to holders of top-tier citizenship from rich Western countries. The freedom to travel, in particular, has become a coveted global resource that many seek to secure through the possession of a second passport. Dual citizenship is part of a global trend toward an increasingly strategic and instrumental understanding of citizenship (Harpaz and Mateos 2019; Joppke 2019).

The rest of this chapter will continue as follows. In the next section, I discuss the growing legal toleration of dual citizenship. I then survey some of the key ways in which governments have used dual-citizenship policies, before moving on to the demand side of dual citizenship, outlining the structure of global inequality that explains individuals' incentives to acquire it. Finally, I present comparative statistics on the prevalence of dual citizenship that illustrate the key role of global inequality in shaping how dual citizenship is used and understood.

## 2. The rise of dual citizenship

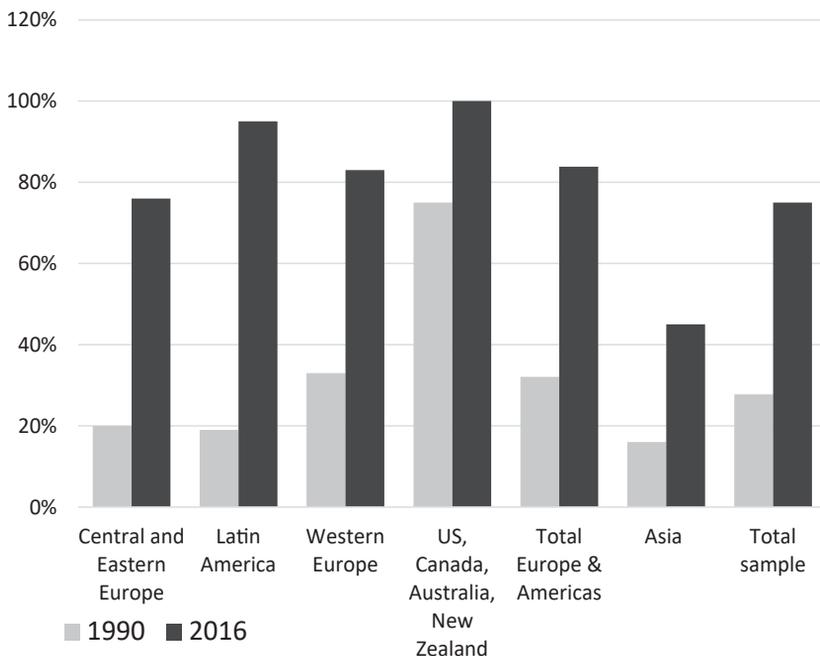
For most of the nineteenth and twentieth centuries, countries typically prohibited dual citizenship and made significant efforts to suppress it. The ban on dual citizenship was enforced through a combination of bilateral treaties, international conventions and attempts by individual states to monitor their citizens. Seen as an anomalous condition, dual citizenship was famously compared to bigamy (Shuck 2002; Spiro 1997, 2015; Weil 2011). This state of affairs has changed dramatically since the 1990s. A new permissive approach to citizenship became popular, as dozens of countries waived the traditional requirement for exclusive citizenship.

Figure 5.1 presents the citizenship policy of 88 countries in the Americas, Europe, Oceania and Asia (data for the Middle East and Africa were not available). The graph shows the percentage of countries in each region that permitted dual nationality in 1990 and 2016 in cases of the voluntary acquisition of a foreign nationality or of the acquisition of the country's own citizenship by naturalisation.

Figure 5.1 illustrates the shift in states' acceptance of dual nationality: in 1990, only 28 per cent of the countries in the sample tolerated it; by 2016, it was accepted by 75 per cent of those countries (see also Vink et al. 2019). This represents a dramatic change in the relation to a legal status that until recently was considered highly problematic, even scandalous. Over the past three decades, the toleration of dual nationality has grown across all the different regions, albeit at different paces. Anglophone settler countries and Western Europe were "early adopters" of multiple citizenship permission.<sup>1</sup> By 1990, the United States, Canada and New Zealand already permitted dual citizenship; Australia joined them in 2002. In Western Europe, about 30 per cent of countries permitted dual

<sup>1</sup> The same goes for former British colonies.

**Figure 5.1. Regions by percentage of countries that permitted dual citizenship in 1990, 2016<sup>1</sup>**



Source: reproduced from Harpaz 2019a.

Notes: The bars show the percentage of countries in each world region that permitted dual citizenship in 1990 (lighter bar) and 2016 (darker bar). The sample includes 72 countries in 1990 and 88 in 2016. <sup>1</sup> Countries were coded as permitting dual citizenship if they formally allowed foreigners to naturalise while retaining their original citizenship or allowed their citizens to naturalise elsewhere without denationalising them. Western Europe includes the EU15 countries as well as Switzerland, Norway and Iceland (18 countries). The Latin American group includes South and Central American countries as well as the Dominican Republic, Cuba and Haiti (21 countries). Central and Eastern European countries include the post-communist members of the EU as well as Russia, Belarus, Moldova, Ukraine, Georgia, Azerbaijan, Armenia, Turkey and Malta (10 countries in 1990, 25 in 2016). Asian countries include Bangladesh, Bhutan, Cambodia, China, East Timor (which did not exist in 1990), India, Indonesia, Japan, Laos, Malaysia, Myanmar, Nepal, Pakistan, the Philippines, Singapore, South Korea, Sri Lanka, Taiwan, Thailand, Vietnam (see Harpaz 2019a).

citizenship in 1990 (among them France, the UK, Ireland and Portugal); about 50 per cent of countries in Western Europe shifted their policy in a permissive direction between 1990 and 2016.

In Latin America and Central and Eastern Europe, levels of dual citizenship acceptance in 1990 were very low, at under 20 per cent of countries. These middle-income regions

experienced a rapid permissive shift (Escobar 2007; Liebich 2009). Today, dual-citizenship policies increasingly converge across Europe and the Americas: the acceptance of dual nationality is becoming a new norm there, where over four-fifths of countries permit dual citizenship (cf. Weil 2011). Asia also shows a trend towards the greater acceptance of dual citizenship, albeit at a slower pace. While most Asian countries – including China, India and Japan – do not permit dual citizenship, the number of countries that tolerate it has tripled since 1990.

The normalisation of dual citizenship represents a shift away from the traditional expectation that citizens maintain exclusive loyalty to their nations. This can be described as a *post-exclusive turn* in citizenship. It is inseparable from another transformation: a *post-territorial turn* in citizenship, as many countries expand the scope of the rights that they offer to their citizens abroad, including absentee voting and consular protection (Ellis et al. 2007; Gamlen 2019; Lafleur 2011). These two shifts are closely connected: the vast majority of dual citizens reside in just one country and their second citizenship comes from a country in which they do not reside. In other words, the proliferation of dual citizenship is inseparable from the spread of non-resident citizenship. The decoupling of membership and rights from physical presence significantly broadens the scope of strategies that are available to states and individuals alike (Harpaz and Mateos 2019).

### **3. State strategies of dual citizenship**

To some extent, the post-exclusive shift in citizenship can be explained by pointing to global, systemic changes. Key factors include the thinning out of security considerations in citizenship policy following the end of the Cold War and growing norms of gender equality which allow women to transmit citizenship to their children (Sejersen 2008). The acceptance of dual citizenship is also tied to increased legal and normative individualism (Harpaz and Mateos 2019; Joppke 2019). Such systemic factors played a role in making dual citizenship “good to think” for governments and publics.

No country, however, moved to accept dual citizenship just because it was fashionable. Instead, governments use citizenship policy strategically, changing their laws to permit dual citizenship in response to concrete challenges and opportunities. Once dual citizenship is allowed, governments may come up with additional schemes that use it to their advantage. In this section, I discuss the strategic ways in which governments have used dual citizenship. In some cases, the strategy I discuss drove the acceptance of dual citizenship while, in other cases, it was adopted after dual citizenship was allowed. This distinction is not pertinent to the present analysis and I discuss these two dynamics together.

When analysing the kind of policies associated with dual citizenship, we should keep in mind Rogers Brubaker’s (1992) dictum that the politics of citizenship are, in effect, the politics of nationhood. When citizenship laws become more or less flexible or more or

less ethnic, this represents attempts by governments to redefine the boundaries of the nation. Post-exclusive and post-territorial shifts in citizenship allow governments to offer flexible, overlapping memberships to individuals living outside the country's territory. In the discussion below, I focus on the top-down perspective of the governments that adopt dual-citizenship policies and use them strategically (the supply side). In subsequent sections, I also present the perspective of the individuals who take up such citizenship (the demand side).

### **3.1 Immigration**

Immigration is the most common scenario that produces dual citizenship. Immigrants and their children may become dual citizens through naturalisation and/or intergenerational transmission, on the condition that both receiving and sending countries permit dual citizenship.

Traditionally, naturalisation required the renunciation of the immigrant's original citizenship. In recent decades, growing numbers of countries have waived the renunciation requirement. In many cases – for example, Sweden in 2001 – dual citizenship was permitted in order to encourage the integration of immigrants by removing a major obstacle to naturalisation (Bernitz 2012). This is an example of dual-citizenship toleration being used to expand the demographic and legal boundaries of the nation *inside* its territory.

On the part of sending countries, a growing number have changed their laws to facilitate the retention and transmission of their citizenship by emigrants in the diaspora. A case in point is Mexico, which moved in 1998 to permit dual nationality and facilitate its transmission to second-generation Mexicans born abroad. The change was intended to encourage Mexican emigrants in the US to naturalise and gain full civic and political rights while, at the same time, trying to ensure that first- and second-generation emigrants maintain their ties to Mexico (FitzGerald 2005; Mateos 2019). Other sending countries encourage emigrant dual citizenship more actively; they include Morocco – which does not permit citizenship renunciation at all – and Turkey – which had prolonged struggles with Germany and Austria over the dual citizenship of Turkish emigrants who naturalised in those countries (Bauböck 2010). Dual citizenship, in such cases, is a strategy that aims for the continued inclusion of emigrants as part of the nation long after they cease to actually live in the country.

The expanding toleration of dual citizenship carries additional, less predictable consequences for the relations between states and individuals, relations which go beyond the domain of immigration. The post-exclusive, post-territorial legal environment allows countries to separate their citizenship policy from their immigration policy and devise novel ways of selecting citizens.

Countries have long had policies that offered facilitated access to immigration or citizenship to selected categories of individuals. The United States, Canada and Australia, among others, have investor visa schemes which cater to would-be immigrants who

have the financial means and the motivation to create a business and run it (Sumption and Hooper 2014). Other countries have long used ethnic or cultural preferences in their immigration policy. Israel offers automatic citizenship to any Jew who settles in the country and, until recently, Germany had a similar policy towards ethnic Germans from Eastern Europe (Harpaz and Herzog 2018; Joppke 2005). Spain allows Latin American immigrants to naturalise after two years of residence, compared to the five years that are usually required (Rubio-Marin et al. 2015).

These kinds of preference – economic, ethnic or cultural – selected individuals for immigrant admission while offering them facilitated or automatic access to citizenship. The underlying assumption was that the selected individuals would enter the country and settle there. The growth of non-exclusive and non-resident citizenship allows countries to design new policies that select foreigners with desirable traits and offer them a second citizenship, *without* requiring either immigration or the renunciation of the original nationality. In Sections 3.2 and 3.3, I discuss a highly significant, unanticipated consequence of dual-citizenship toleration: the increasingly common policy of allowing non-resident foreigners to acquire citizenship in a long-distance manner.

### **3.2 Ancestry-based external citizenship**

Many countries invite former citizens and their descendants to reacquire citizenship. In 12 European countries, emigrants who had to give up their citizenship when naturalising in another country may reclaim it without giving up their other nationality (Dumbrava 2014). In some of these countries – including Spain, Romania, Hungary, Italy, Ireland and Greece – the offer of dual citizenship extends to the children, grandchildren and sometimes even great-grandchildren of former citizens. The descendants of European emigrants living in the US, Australia, Israel or Latin America may apply to reacquire citizenship without having to move back or to give up their current citizenship. From a legalistic point of view, such policies may be seen as no more than a retroactive application of the acceptance of dual citizenship. Upon closer examination, however, there are more complex logics at work.

One key motive behind ancestry-based dual citizenship policies is governments' wish to symbolically bolster the national population in terms of size and ethno-religious composition. In most European countries, the rate of natural population growth (births minus deaths) is negative and has been so for many years. Western European countries maintain a positive population balance thanks to immigration. Meanwhile, in most Central and Eastern European countries, the population is shrinking. Against this background, moves to increase the number of citizens are perceived in a positive light by politicians and parts of the public. This view applies even if the vast majority of these new citizens will never go to live in their old-new homeland (Cook-Martín 2013; Dumbrava 2015, 2019; Fintonelli, La Barbera and Echeverría 2017). Furthermore, potential external citizens – for example, Italian or Spanish descendants in Latin America – are similar to the

national majority in terms of their ethnicity and religion. For some, this makes them more attractive candidates for inclusion than many non-European, non-Christian immigrants who actually live in the country.

In some cases, governments set up ancestry-based dual citizenship programmes expecting electoral gains from their new citizens. Given that citizens living abroad are now allowed to vote in most national elections (Ellis et al. 2007), creating external citizens usually means creating new voters. Proposals to promote external citizenship are often supported by parties that expect to gain from the diaspora vote and opposed by those who expect little support from it (Rubio-Marin et al. 2015; Tintori 2011). Other motives that drive governments to promote ancestry-based citizenship include a wish to maintain good ties with rich and influential diasporas and hopes to attract investment. Diaspora and emigrant organisations often lobby for dual citizenship. They tend to have an impact in developing countries, in particular, where remittances are an important source of income (Escobar 2007).

### **3.3 Ethnicity-based external citizenship**

Numerous countries offer external dual citizenship on the basis of ethnicity. Here, too, European countries take the lead (Dumbrava 2014; Pogonyi 2017). Co-ethnic policies use language, religion or self-identification as criteria for citizenship and these supplement or substitute for the ancestry requirement. For example, Hungary offers external dual citizenship to foreigners who can (1) prove their descent from Hungarian nationals and (2) show mastery of the Hungarian language. The language criterion aims at including cross-border ethnic Hungarians whose ancestors were stranded outside Hungary after World War One while, at the same time, excluding ethnic Romanians, Ukrainians, Serbs and Slovaks living in the same areas (Harpaz 2019a). Bulgaria gave out dual citizenship to those citizens of Macedonia, Ukraine and Moldova who declared that they identified as Bulgarian, without requiring any documented proof of descent from Bulgarian citizens (Neofotistos 2009; Smilov and Jileva 2013). Other countries with co-ethnic citizenship policies include Romania, Croatia, Serbia and Greece (Dumbrava 2014).

One of the key motivations that drive governments to adopt co-ethnic external-citizenship policies involves making a symbolic declaration about the state's identity. The inclusion of external co-ethnics sends a powerful signal about the primacy of an ethnic over a civic definition of the nation. It demonstrates that the state "belongs" to a community of descent, traditions and identity rather than to a community of formal citizens (cf. Hayden 1992; Liebich 2009). This symbolic function can be compared to Israel's Law of Return from 1950, which institutionalises the state's Jewish character. There is a key difference, however. Israel's Law of Return, which dates back to the era of exclusive and territorial citizenship, invites diaspora Jews to come to Israel as immigrants, with citizenship as part of the package. This configuration maintains the distinction between Israelis and diaspora Jews. The latter may easily *become* Israeli but they are not *already*

Israeli. In contrast, new co-ethnic dual-citizenship laws in Central and Eastern Europe offer citizenship outright, without conditioning it on any other tie to the state or territory. Ethnicity is directly translated into citizenship status, in what was aptly described as “post-territorial nationalism” (Ragazzi and Balalovska 2011).

Another, closely related, aim behind co-ethnic citizenship laws is to make a symbolic claim on territories in neighbouring countries. The granting of Hungarian passports to ethnic Hungarians in Transylvania (part of Romania) or Vojvodina (in Serbia) makes the point that these regions are tied to Hungary (Harpaz 2019a; Pogonyi 2017). This policy strives to negate Hungary’s territorial losses from the past century – though only on a symbolic level and not by actually redrawing borders (for now). Similar motives can be identified in Romania in relation to Moldova, in Bulgaria *vis-à-vis* Macedonia and in Serbia and Croatia *vis-à-vis* parts of Bosnia-Herzegovina (Dumbrava 2019; Lordachi 2004; Smilov and Jileva 2013). Given the region’s long history of conflicts over territory and ethnic dominance, post-territorial nationalism appears to be a provocative strategy.

Since the end of the Balkan wars of the 1990s, however, none of these countries actually weaponised co-ethnic dual citizenship to try and take over neighbouring territories.<sup>2</sup> There is one recent example of a country weaponising external dual citizenship for territorial expansion: Russia’s use of dual citizenship to justify its 2008 invasion of Georgia. In the years leading up to the war, Russia handed out passports to Russian-speakers in the breakaway regions of Abkhazia and South Ossetia. When conflict between separatists and the Georgian government escalated, Russia launched a military invasion to “protect its citizens” (Allison 2008; Zevelev 2008). Russia also maintains a military presence in Transnistria, a breakaway region in Eastern Moldova where most of the population holds Russian dual citizenship and has been handing out passports to residents of Ukraine.

Other motives behind co-ethnic external citizenship programmes are comparable to those found in ancestry-based external citizenship, above all in terms of votes. When governments offer external citizenship, they often expect electoral support in exchange. This was especially clear in Hungary, where newly created dual citizens voted *en masse* for Prime Minister Orbán and helped him to win an important 2014 election campaign (Harpaz 2019a; Pogonyi 2017).

### **3.4 Citizenship by investment**

The roots of present-day investment citizenship policies are traceable to the immigrant investor visa programmes of countries like the US, Canada, Australia and the UK (Sump-

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<sup>2</sup> Serbia and Croatia had different citizenship strategies during the war in Bosnia-Herzegovina. Croatia gave out co-ethnic citizenship to facilitate potential annexation of the republic’s western parts. Serbia fought to keep Bosnia-Herzegovina – or at least its Serbian-populated parts – as part of a Serbian-dominated Yugoslavia. Eventually, neither country won any territory but both ended up giving out passports (Croatia in the 1990s, Serbia in the past decade).

tion and Hooper 2014; Surak 2020). Those programmes offer immigrant visas to wealthy investors in exchange for investments that would create jobs and taxable income. Such visas can lead to citizenship relatively easily, conditional on the usual naturalisation requirements. In contrast, citizenship-by-investment programmes represent an adaptation of *jus pecuniae* (the right of money, see Džankić 2019) to the era of non-exclusive and non-territorial citizenship. Investors provide a sum of money and receive a passport, without having to fulfill any meaningful residence requirement or give up other allegiances.

Several small Caribbean island nations, like St Kitts and Nevis, have been offering “citizenship for sale” schemes since the 1980s (Surak 2020). After the 2008 economic crisis, similar schemes were adopted by many other nations, including EU members Malta and Cyprus, where citizenship is available to non-resident foreigners for a hefty sum of over 1 million euros (Arlidge 2019; Surak 2020). The motives are quite straightforward: exchanging passports (or residence visas) for investment appears to be an easy and attractive way to fill the state’s coffers and stimulate economic activity. The wealthy individuals who acquire such citizenship very rarely establish any actual ties to the country of citizenship, lending credence to critics’ claims that this is, in fact, an exchange of cash for passports (Shachar 2017; Shachar and Bauböck 2014).

#### 4. Citizenship and global inequality

The growing toleration of dual citizenship allows governments to fashion flexible citizenship policies – that include non-resident foreigners – from which they expect to derive some value, which may be symbolic, demographic, electoral or economic. This is the supply side. What explains the demand side? Namely, what draws people to become citizens of a country in which they do not live and with which they often do not feel any identification?

Answering this question requires taking a broader, global view of citizenship. Typically, citizenship is analysed within the scope of a specific country. It determines who belongs to the nation and what rights they may claim (Marshall 1950).<sup>3</sup> At the same time, citizenship operates as a legal boundary that is drawn around a country’s population. Because every human is (ideally) a citizen of some state, citizenship is also a global sorting mechanism that allocates individuals to states (Brubaker 1992; Hindess 1998). This is its Westphalian function, in Rainer Bauböck’s (2019) term. Given the vast disparities in citizenship value between different countries, the closure function of citizenship is a mechanism of global stratification (Shachar 2009). The hierarchy of citizenships institutionalises access to unequal packages of economic opportunities, security, rights, welfare and travel freedom (Harpaz 2019a, b).

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<sup>3</sup> The word citizenship carries additional meanings – above all, as identity and practice (Joppke 2007) – but I will set them aside here.

Income disparities between countries are the most salient and easy-to-measure way to conceive of global inequality. The average GDP *per capita* in OECD member-countries (about \$40,000) is almost four times higher than the world average (\$11,000) and over 25 times higher than in poor sub-Saharan and South Asian countries (about \$1,500), even when adjusting for purchasing power parity (PPP).<sup>4</sup> Branko Milanović (2016) calculated that income inequality between countries (i.e. location or citizenship) plays a bigger role in explaining income gaps between individuals worldwide than income inequality within a country (i.e. class). A person's citizenship is the most important factor that predicts his or her income, more than class, race or gender. Global inequality extends beyond income gaps; in fact, it applies to almost any conceivable domain of human flourishing, including security, political rights, access to health and social services and even clean air and water. For example, a child born in Sierra Leone is 60 times more likely to die before the age of five than a child in Norway (UNDP 2013). Differences in crime rates make a person living in Honduras 56 times more likely to be a victim of homicide than a resident of Canada (UNODC 2014).

Citizenship also stratifies the world's population in terms of access to other national territories beside one's own country. The world's passports are not equal. Whereas citizens of rich Western countries may travel freely throughout most of the world, travellers from less affluent and secure countries must expend substantial amounts of time and money on obtaining visas before they may travel abroad (Harpaz 2019b; see also Hobolth 2014; Mau et al. 2015; Shamir 2005).

Visa policies are a kind of "peer review" that states make of one another. They are based on an assessment of risks on the part of legislators, officials and bureaucrats in the destination country. This assessment concerns the likelihood that a citizen of a certain country (say, Uganda or Finland) will turn out to be an illegal immigrant, a criminal, a terrorist or a smuggler. Passengers from countries with high citizenship value (such as Finland) are perceived as low-risk, and enjoy visa-free access to most countries; citizens of countries with low citizenship value (such as Uganda) are seen as high-risk and their movement is controlled by strict visa requirements. The degree of travel freedom provided by the different nationalities delimits the practical opportunities open to a country's citizens while at the same time determining their place within global hierarchies of status and prestige (Harpaz 2019a).

In recent years, scholars have developed models of global inequality in citizenship value. These models compare nationalities rather than countries and calculate their relative value on the basis of the rights, entitlements and access that they provide, both within a state's territory and outside it. I present here, in brief, the model that I developed

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<sup>4</sup> Statistics from the World Bank website, "GDP per capita, current \$US". <https://data.worldbank.org>. When taking into account purchasing power parity (PPP), the gaps are smaller (2.7:1 and 12:1, respectively).

(Harpaz 2019a, b) as well as a model developed by Chris Kälin and Dimitry Kochenov (Kochenov and Lindeboom 2020).

My model (Harpaz 2019a, b) integrates separate measures for the territorial and extra-territorial values of citizenship. The internal, territorial value – i.e. the worth of citizenship for a person living in the country – is calculated on the basis of three dimensions: economic development, security and democracy. In addition, I calculated the external value of citizenship as manifested by the degree of travel freedom, which I measured using the Henley and Partners Visa Restrictions Index, which ranks nationalities by the number of visa-free territories they may access (see Harpaz 2019a for details).

The analysis showed that the different components of citizenship value – development, security, democracy and travel freedom – are highly correlated. Richer countries tend to be more stable and democratic, with their citizens enjoying extensive travel freedom, while the opposite holds true for poorer countries. The rank correlations between the four different citizenship components were between 0.65 and 0.89, at  $p < 0.001$  (Harpaz 2019b, 903).<sup>5</sup> The convergence of different components of citizenship value magnifies the gaps between different citizenships. The model suggests that the world's citizenship can be divided into a three-tier hierarchy: first-tier citizenship countries occupy the top 10–15 per cent of countries in both internal and external value; the middle tier of citizenship includes countries that are between the fiftieth and the ninetieth percentile on both internal and external measures; and the third tier of citizenship (by far the most populous) includes countries that are below the median in either of these dimensions.

Figure 5.2, reproduced from my book, *Citizenship 2.0: Dual Nationality as a Global Asset* (Harpaz 2019a), shows the world's countries, divided into three tiers of citizenship value. This map in Figure 5.2 highlights the correlation between citizenship tiers and world regions. The first-tier citizenship category includes the nations of Western Europe and Anglophone settler countries (often grouped under the title “the West”), in addition to Japan and South Korea; middle-tier countries are mostly concentrated in Latin America and Central and Eastern Europe and also include Israel, Taiwan, Singapore, Turkey, the UAE, Malaysia and South Africa. The third tier includes most countries in Asia and Africa, including China and India.

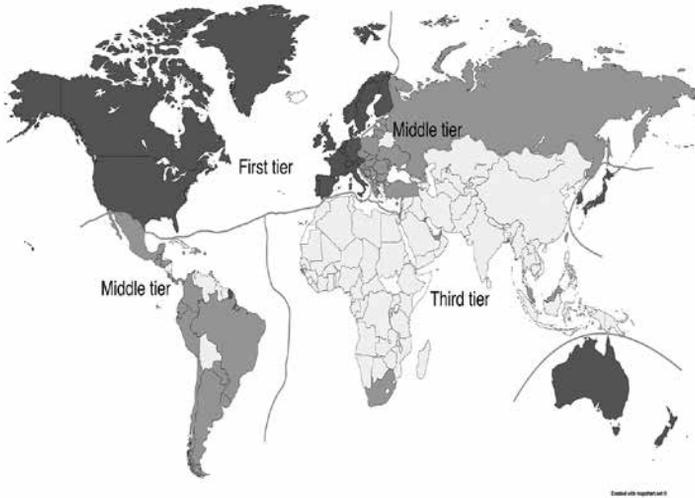
Another model for describing global inequality in citizenship value, the Quality of Nationality Index, was developed by Kälin and Kochenov and also aimed to capture both internal and external components of citizenship value. The Kälin and Kochenov model also includes a measure of settlement freedom, which indicates the right to reside and work

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<sup>5</sup> Correlations were calculated using Spearman's rank correlation coefficients, which assess the correlation between two sets of ranked variables, from 0 (no correlation) to 1 (identical ranking) (Harpaz 2019b).

in different countries (Kochenov and Lindeboom 2017).<sup>6</sup> Overall, the Kälin and Kochenov model produces results that are similar to those that emerge from the model described previously. Of the five citizenship ranks that it defines, the two highest categories are dominated by Western European countries and European offshoots like the United States and Australia, the middle category includes Latin American and Eastern European nations and the bottom two categories mostly consist of countries in Asia and Africa.

**Figure 5.2. World map divided into citizenship tiers**



Source: reproduced from Harpaz (2019a).

Note: the map shows the world's countries according to their tier position. These reflect the aggregated territorial and extraterritorial value of citizenships. The dark-coloured countries are first tier and the light-coloured ones are third tier. Middle-tier countries are coloured in medium grey. No data were available for Somalia, South Sudan, Western Sahara, North Korea and Iceland.

To conclude this section, citizenship is a system of global stratification that allocates individuals to ranked positions. The hierarchy of travel freedom is of particular interest because it involves countries assessing one another's citizenship value. Moreover, its effects are felt even when a person ventures outside his or her country of citizenship. In the next section, I bring these insights to bear on the question of demand for dual citizenship.

<sup>6</sup> Source: <https://www.nationalityindex.com>. Settlement freedom measures the extent to which citizenship of one country allows rights of work and residence in other countries, as with citizenship of EU-member countries or of other similar organisations such as Mercosur. My model does not include settlement freedom as an element of citizenship value because it does not reflect the inherent value of a country's citizenship and is subject to fluctuations. Another difference is that the Quality of Nationality Index model does not include a measure of democracy (Kochenov and Lindeboom 2020).

## 5. Understanding demand: comparative statistics on dual citizenship

Global inequality explains patterns in the acquisition and use of dual citizenship. In this section, I support this argument on the basis of comparative statistics on dual citizenship, with a special emphasis on the long-distance acquisition of ancestry- or ethnicity-based dual citizenship.

To this end, I reproduce a dataset that uses citizenship statistics from 30 countries with a combined population of 948 million (Harpaz 2019a). The statistics refer to the population resident in the country's territory. They include 24 European countries and four Latin American countries, as well as Canada and Israel (statistics for some key countries, such as the US and the UK are unfortunately not available). In terms of citizenship tiers, there are nine first-tier and 21 middle-tier countries. I compiled these data from a variety of sources: national censuses, consular reports and existing academic publications. The figures below should be treated as minimum estimates because, in some countries, they only include part of the dual citizen population.<sup>7</sup> I refer to a person's residence-country citizenship as their primary citizenship and their non-resident citizenship as their secondary citizenship.

Table 5.1 shows levels of dual citizenship in 23 countries out of the sample (countries with very small dual citizen populations are not shown).<sup>8</sup>

**Table 5.1. Prevalence and characteristics of dual citizenship in selected countries**

1 Country	2 Dual citizens	3 % dual citi- zens	4 Most common secondary citizenship	5 Tier of secondary citizenship	6 Main path- way to secondary citizenship	7 % foreign- born
<i>First-tier citizenship countries</i>						
Germany	4,300,000	5.3	Russia	Middle	Immigration	12.0
France	3,300,000	5.0	Algeria	Third	Immigration	12.0
Netherlands	1,306,274	7.7	Morocco	Third	Immigration	11.0
Canada	944,700	2.9	UK	First/EU	Immigration	21.0
Spain	863,000	1.8	Ecuador	Middle	Immigration	14.0

<sup>7</sup> For all countries but one, the data pertained to the years between 2010 and 2016 (for France, the data were for 2008). In some countries the data capture only part of the dual-citizen population: in Switzerland, the data only include persons over 15 years of age; the figures for Israel, Brazil, Venezuela, Argentina and Moldova rely on statistics from the major countries of secondary citizenship and are therefore incomplete. See Harpaz (2019a) for more details.

<sup>8</sup> The table leaves out seven countries in Central and Eastern Europe, where the number of dual citizens in 2011 was less than 50,000: Czechia, Slovakia, Albania, Bulgaria, Armenia, Montenegro and Lithuania (see Shachter 2015).

1 Country	2 Dual citizens	3 % dual citi- zens	4 Most common secondary citizenship	5 Tier of secondary citizenship	6 Main path- way to secondary citizenship	7 % foreign- born
Switzerland	688,561	8.6	Italy	First/EU	Immigration	29.0
Portugal	244,745	2.3	Brazil	Middle	Immigration	8.0
Finland	104,997	2.0	Russia	Middle	Immigration	5.0
Ireland	104,784	2.3	USA	First/EU	Return migration	16.0
<b>Total: first tier</b>	<b>11,857,061</b>	<b>4.3</b>				<b>13.0</b>
<b><i>Middle-tier citizenship countries</i></b>						
Brazil	880,000	0.4	Portugal	First/EU	Long-distance acquisition	<1.0
Israel	840,000	10.0	USA	First/EU	Immigration	26.0
Bosnia-Herzegovina	800,000	20.0	Croatia	First/EU	Long-distance acquisition	<1.0
Argentina	790,473	1.9	Italy	First/EU	Long-distance acquisition	5.0
Mexico	778,000	0.6	USA	First/EU	Return migration	<1.0
Venezuela	587,555	2.0	Colombia	Third	Immigration	4.0
Romania	441,331	2.0	Hungary	First/EU	Long-distance acquisition	<1.0
Serbia	401,548	5.5	Hungary	First/EU	Long-distance acquisition	6.0
Poland	327,500	1.0	Germany	First/EU	Long-distance acquisition	2.0
Moldova	326,000	9.0	Romania	First/EU	Long-distance acquisition	11.0
Greece	190,000	1.7	Albania	Middle	Immigration	9.0
Hungary	88,906	0.9	Romania	First/EU	Immigration	5.0
Croatia	86,404	2.0	Bosnia	Middle	Immigration	18.0
Russia	78,615	0.1	Ukraine	Middle	Immigration	8.0
<b>Total: middle tier</b>	<b>6,723,374</b>	<b>1.0</b>				<b>3.5</b>
<b>Total sample</b>	<b>18,580,435</b>	<b>2.0</b>				<b>6.0</b>

Source: Harpaz 2019a.

Note: Columns 2 and 3 present the number of dual citizens in each country in absolute numbers and as a percentage of the total population. Column 4 presents the leading country of secondary citizenship and Column 5 its citizenship tier. Column 6 presents the pathway that characterises the leading country of secondary citizenship. Column 7 presents the percentage of foreign-born immigrants in the country's population. The totals also include low-prevalence countries (fewer than 50,000 dual citizens) that are not shown in the table.

The table compares levels of dual citizenship in various countries, highlighting differences that have to do with global citizenship stratification. Column 2 presents the number of dual citizens in each country. While absolute numbers of dual citizens in first-tier countries are significantly higher, numerous middle-tier countries host substantial populations of dual citizens. In this sample, average levels of dual citizenship as a percentage of the population (Column 3) are much higher in first-tier countries – 4.3 per cent compared to 1 per cent in middle-tier countries. Nonetheless, the three countries with the highest percentage of dual citizens were middle tier: Bosnia-Herzegovina, Israel and Moldova. Overall, almost a third of dual citizens in the sample were in middle-tier countries.

Columns 4 and 5 list the most common country of secondary citizenship and its tier position for each residence country. In first-tier countries, secondary citizenship tiers were mixed. The countries with the highest numbers of dual citizens – Germany, France and the Netherlands – were dominated by middle-tier or third-tier citizenship countries (for example, Algerian dual citizenship in France). This represents the expected pattern of immigration and citizenship: people move from less-developed to more-developed countries and – when given the option – retain their original citizenship when they naturalise.

Moving on to middle-tier countries, however, we find less-expected patterns of dual citizenship: the leading country of secondary citizenship was typically an EU country or the United States. In all but one of the ten middle-tier countries with the highest numbers of dual citizens, the dominant secondary citizenship was from a Western or EU country. Middle-tier countries where the dominant secondary citizenship was from a middle- or third-tier country (like Greece or Croatia) typically had very low numbers of dual citizens. Thus, secondary citizenship in middle-tier countries was typically from a Western or EU country.

Columns 6 and 7 list the pathways to dual citizenship in countries of different citizenship tiers. Western European and North American countries receive large numbers of immigrants. Dual citizenship there is created in the context of immigration and is mainly found among first- and second-generation immigrants. The leading countries of secondary citizenship in first-tier countries were typically those that have sent the largest numbers of immigrants – for example, Algeria in France and Morocco in the Netherlands.<sup>9</sup>

Most middle-tier countries, in contrast, receive little immigration. Except in Israel and Venezuela, ongoing immigration is not the main process that produces dual citizenship.<sup>10</sup> Instead, dual citizens in middle-tier countries mainly consist of native-born citizens who have acquired secondary citizenship in a long-distance manner from a

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<sup>9</sup> Source: United Nations migration statistics.

<sup>10</sup> Hundreds of thousands of Colombian immigrants naturalised in Colombia in the 2000s. The long-distance acquisition of EU citizenship was an additional major pathway to dual citizenship in Israel and Venezuela, as well as in Mexico (see Harpaz 2013, 2019a).

European Union country on the basis of descent or ethnicity. For example, Argentinians and Brazilians acquire descent-based citizenship from Italy, Portugal and Spain. Serbians and Ukrainians, meanwhile, acquire co-ethnic citizenship from Hungary, Romania, Bulgaria and Croatia. Long-distance acquisition was the dominant pathway to dual citizenship in most of the leading middle-tier countries in the table. In Mexico, secondary citizenship from the US is produced in the context of circular migration, which includes return migration and deportation, as well as some parents' strategic decision to give birth in the United States in order to secure dual nationality for their children (Harpaz 2019a).

Statistics on the acquisition of ancestry- or ethnicity-based citizenship from EU countries reinforce this picture. Between 1998 and 2010, over one million persons have acquired Italian dual citizenship on the basis of descent. Over a million people have acquired Hungarian co-ethnic citizenship since 2011 (Harpaz 2019a). Spain and Romania, as well, gave citizenship to hundreds of thousands of non-residents (Harpaz 2015). Almost all the applicants for ancestry-based or co-ethnic citizenship came from middle-tier citizenship countries in Latin America and Eastern Europe. Almost none of the millions of eligible individuals living in Western Europe and North America have applied for this kind of dual citizenship. For example, out of 18 million Americans who have some Italian ancestry, no more than 25,000 acquired ancestry-based Italian citizenship in 1998–2010 (Harpaz 2015, 2019a).

This demonstrates that global inequality in citizenship value shapes patterns of dual citizenship acquisition. In Western countries with first-tier citizenship, dual citizenship is mostly produced as a result of immigration from lower-tier countries. In middle-tier countries outside the West, dual citizenship is typically from Western countries and it is produced deliberately through strategies of long-distance acquisition.

Qualitative work on long-distance dual citizenship corroborates these findings and helps to flesh them out (see, for example, Altan-Olcay and Balta 2020; Cook-Martín 2013; Knott 2019; Mateos 2019; Pogonyi 2017). For the sake of brevity, I will just mention three cases (Harpaz 2019a): Israelis who acquired ancestry-based EU citizenship, Serbians with co-ethnic citizenship from EU-member Hungary and Mexicans who strategically gave birth in the US to provide a second nationality for their children.

In all three cases, applicants were interested in securing a second passport that would improve their travel freedom and specifically make it easier to visit EU countries and the United States. Thanks to the boost in travel freedom, the second passport was often also seen as a status symbol (see Harpaz 2013). Another key motivation was risk management: Israelis feared a catastrophic war with their Arab neighbours, whereas Mexicans were concerned about rampant criminal violence; in both countries, having an EU or US passport was seen as an "insurance policy". Finally, the second passport was seen as a key to economic opportunities: Israelis said that EU passports would make it easier for them to study and work in EU countries if they wished to, while many Mexicans

wanted to give their children the option to study in the United States. In Serbia, many used their Hungarian passports to seek work – either temporary or long-term – in EU member-countries Germany, Austria and Sweden.

These three uses – travel freedom, security and economic opportunities – are derived from the higher practical value of EU/US citizenship relative to applicants' primary, resident citizenship. I should stress that these instrumental motives were not the only reasons why people in these countries sought dual citizenship. Members of Serbia's Hungarian minority were excited and proud to be officially Hungarian – the feeling seemed to be even stronger among ethnic Hungarians in Romania (Pogonyi 2017), and some Israelis had a sense of historical justice when given "back" their grandparents' German, Polish or Romanian citizenship.

Nonetheless, the main motivation driving applications was instrumental. This is seen from the acquisition statistics and patterns of use that were discussed above. As an illustration of instrumental citizenship, consider this extreme case taken from the Israeli sample. In a 2015 interview, this 31-year-old, Israeli-born man told me about his quest for an EU passport. He began in the Polish embassy in Tel-Aviv, continued with attempts to dig up Czech roots, then went on to check his eligibility for Greek citizenship; he then tried the Turkish embassy before, finally, approaching the Hungarian authorities. In each case, he encountered some legal hurdle that made him ineligible for citizenship. Having exhausted the birth places of all four grandparents, he was ready to give up. At that moment, however, Spain and Portugal passed laws offering citizenship to Sephardic Jews, which include the Jewish communities of Greece and Turkey. In a follow-up interview in 2019, he proudly announced that he had finally become a Spanish citizen. In spite of his satisfaction at gaining an EU passport, he still stood by his words in the 2015 interview: "The passport I would have really liked to have is American [...] but I'll take whatever I can get" (Harpaz 2019a, 106–107).

## Conclusion

This chapter has outlined some of the political and economic forces that shape the global phenomenon of dual citizenship. I have pointed out the new strategic options that open up for states and individuals once the traditional criteria of exclusive belonging and territorial presence are waived. The emerging picture is consistent with recent arguments about citizenship becoming instrumental (Joppke 2019) or strategic (Harpaz and Mateos 2019). It also highlights the close connection between dual citizenship and the burgeoning study of diaspora politics and cross-border nationalism (Bauböck 2010; Gamlen 2019; Ragazzi and Balalovska 2011).

The dynamics of citizenship described in this chapter evolved over a period of three decades marked by increasingly open borders. Over these years of globalisation, human experience itself was becoming increasingly mobile and flexible. Under these conditions,

the strategic approach to national membership flourished. It is not clear how this legal and normative reality will be impacted on by the Covid-19 pandemic, which put an abrupt halt to most kinds of international movement. It remains to be seen whether this crisis – and other, related, global crises that are likely to follow it – will devalue dual citizenship by restricting mobility or, on the contrary, will make it doubly important because of heightened political and economic risk.

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