

INTERACT – RESEARCHING THIRD COUNTRY NATIONALS’ INTEGRATION AS A THREE-WAY PROCESS - IMMIGRANTS, COUNTRIES OF EMIGRATION AND COUNTRIES OF IMMIGRATION AS ACTORS OF INTEGRATION

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Immigrant Integration and Access to Citizenship in the European Union: The Role of Origin Countries

Maarten Peter Vink

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Researching Third Country Nationals' Integration as a Three-way Process -
Immigrants, Countries of Emigration and Countries of Immigration as Actors of
Integration

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Citizenship in the European Union:
The Role of Origin Countries

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INTERACT - Researching Third Country Nationals' Integration as a Three-way Process - Immigrants, Countries of Emigration and Countries of Immigration as Actors of Integration

Around 25 million persons born in a third country (TCNs) are currently living in the European Union (EU), representing 5% of its total population. Integrating immigrants, i.e. allowing them to participate in the host society at the same level as natives, is an active, not a passive, process that involves two parties, the host society and the immigrants, working together to build a cohesive society.

Policy-making on integration is commonly regarded as primarily a matter of concern for the receiving state, with general disregard for the role of the sending state. However, migrants belong to two places: first, where they come and second, where they now live. While integration takes place in the latter, migrants maintain a variety of links with the former. New means of communication facilitating contact between migrants and their homes, globalisation bringing greater cultural diversity to host countries, and nation-building in source countries seeing expatriate nationals as a strategic resource have all transformed the way migrants interact with their home country.

INTERACT project looks at the ways governments and non-governmental institutions in origin countries, including the media, make transnational bonds a reality, and have developed tools that operate economically (to boost financial transfers and investments); culturally (to maintain or revive cultural heritage); politically (to expand the constituency); legally (to support their rights).

INTERACT project explores several important questions: To what extent do policies pursued by EU member states to integrate immigrants, and policies pursued by governments and non-state actors in origin countries regarding expatriates, complement or contradict each other? What effective contribution do they make to the successful integration of migrants and what obstacles do they put in their way?

A considerable amount of high-quality research on the integration of migrants has been produced in the EU. Building on existing research to investigate the impact of origin countries on the integration of migrants in the host country remains to be done.

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Abstract

This position paper addresses the following research question: “How do actors in sending countries influence the integration of immigrants in the European Union, with regard to the access to citizenship?” The paper argues that the access to citizenship can be viewed as an important factor in the process of integration of immigrants in the destination country. The role of actors in third countries, while only one of the factors that determine citizenship take-up among integration, is crucial as particularly by allowing dual citizenship, countries of origin can take away a major constraint for immigrants in the naturalisation process. Research shows that naturalisation rates are positively impacted by tolerant policies towards dual citizenship. The report discusses the state-of-the-art on the propensity to naturalise among immigrants, as well as on the relation between citizenship and integration. It also presents some key findings from the literature and outlines the relevant questions for further research.

Acknowledgments

This report draws on previous co-authored work with Jaap Dronkers, Gerard-Rene de Groot, Chun Luk, Tijana Prokic-Breuer and Hans Schmeets. See relevant cited works in the text. The author would like to acknowledge the constructive input for this report and feedback on an earlier draft from Philippe Fargues, Anne Unterreiner and Agnieszka Weinar.

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1. Introduction to the field of research

This position paper addresses the following research question: “How do actors in sending countries influence the integration of immigrants in the European Union, *with regard to the access to citizenship?*”

Three conceptual clarifications should be made from the start. First, an ‘immigrant’ is defined as a person born in a third country and residing in the European Union. While immigrants can be understood more generally as all foreign-born persons residing in a country, following the overall focus of the INTERACT project we restrict our discussion in this paper to immigrants from non-EU countries. Second, ‘integration’ as understood as the process by which immigrants become accepted into society, both as individuals and as groups (Penninx 2003). This definition thus views integration deliberately as a process, rather than as an endpoint and also is deliberately open as to what precisely determines the acceptance of immigrants in a society, which may –after all– vary from one receiving society to the other. Thirdly, ‘citizenship’ is a legal status and relation between an individual and a state that entails specific legal rights and duties. (EUROPEAN COMMISSION 2013a). In some countries, the status may be called ‘nationality’ rather than citizenship and the persons holding the status are referred to as nationals rather than citizens. In this paper, the terms citizenship and nationality are conceived as interchangeably, though for the sake of clarity we systematically use the first term only.

Following these conceptual clarifications, the paper starts out on the basis of two assumptions with regard to the role of third countries with regard to immigrant integration and access to citizenship. While these two assumptions are not intended as undisputable starting points for the following discussion, they do indicate the theoretical scope within which this paper should be positioned. The first assumption is that the access to citizenship can be seen as indicator of integration, in the sense that it closes an important legal gap between immigrants and natives. However, although from the perspective of ‘becoming accepted into society’ acquiring destination country citizenship is likely an important step in the integration process, it is not seen as the endpoint of this process. Hence, in this report the access to citizenship is viewed as a necessary, but not a sufficient condition for full integration of immigrants in the destination country. The second assumption is that third countries cannot directly influence the acquisition of citizenship by immigrants in EU member states, which is after all a sovereign competence of the respective state (within the constraints set by international law, for example with regard to the avoidance of statelessness); however, particularly by allowing dual citizenship, countries of origin can take away a major constraint for immigrants in the naturalisation process. Hence, political actors in origin countries, such as legislators who determine the rules of dual citizenship as well as government officials linked to diplomatic representations who may reach out to the emigrant community, are expected to be able to play an important role in the process of integrating migrants in destination countries, in terms of stimulating (or not) the acquisition of citizenship. Their role, however, is necessarily one which should be understood in conjunction with the constellation of actors and rules in the destination country.

When discussing the role of origin countries in relation to citizenship acquisition of migrants in destination countries, one enters unavoidably into a discussion on dual citizenship, understood as the possession by individual of two citizenship statuses. Dual citizenship is a fact of life in a mobile world. As a result of international migration, rearrangements of the territorial scope of states and the lack of a global coordination between citizenship laws, millions of people worldwide are citizens of two, or more, states (Faist 2009; Faist and Kivisto 2007).¹ In Europe, where increasing gender equality provides both the father and the mother the opportunity to transmit their citizenship to their offspring, children often automatically become dual citizens at birth when their parents are citizens of different

¹ In this paper we use the term ‘dual citizenship’, but it is possible that individuals possess more than two citizenship statuses, in which case the term ‘multiple citizenship’ would be more appropriate.

states. They often also acquire two citizenships when they are born in another country than their parents and their country of birth has a regime of territorial birthright (Vink and De Groot 2010). Many people moreover acquire an additional citizenship at a later stage of life because they take up residence in another country than where they born and wish to consolidate their position in that new society through acquiring the citizenship of their country of residence.

Despite its ascendancy as a demographic phenomenon, dual citizenship is still seen by many as a problematic phenomenon that should be avoided if possible. In line with a traditionally restrictive approach to dual citizenship in international law, a substantial number of states in Europe and beyond actively discourage multiple citizenship, by requiring candidates for naturalisation to renounce their previous citizenship prior to naturalisation or by having provisions that lead to the automatic loss of citizenship when their citizens voluntarily acquire another citizenship (Vonk 2012; Vink and De Groot 2010). However, the worldwide number of states with a restrictive approach to dual citizenship has been decreasing for the past few decades and migrants are thus increasingly less often compelled to make a decision regarding their choice of citizenship (United Nations 2013: 113).

From a destination country perspective, naturalisation is increasingly seen as an important part of the process of integrating immigrants and in order to optimise the use of what is sometimes termed the 'citizenship premium', actors in destination countries increasingly often advocate public policies that are aimed at increasing naturalisation rates among immigrants (OECD 2011; Sumption and Flamm 2012). The acquisition of citizenship is associated with better employment probability, higher earnings and higher occupational positions (Liebig and von Haaren, 2011). Politically, citizenship of course usually qualifies immigrants to take an active part in the electoral politics of the destination country, but research also shows that it increases non-electoral political participation, although with substantial variation among immigrant groups (Prokic-Breuer, Vink, Hutcheson and Jeffers, 2013; cf. Pikkov 2011).

In the remainder of the paper, we first discuss the main methodological approaches in researching integration in this field of research, with particular attention to the influence of the countries and societies of origin. Subsequently, we outline the actors involved and identify the diverging and converging interests of the sending and receiving countries, as well as the strategies of the sending societies to push their interests. The paper will then outline the theoretical framework and subsequently illustrate the framework with case studies concerning the relationships between the countries of origin and their impact on migrant communities abroad.

2. Methodology used in research in the field

The question of immigrant naturalisation is not a new question in the migration literature. A well-developed body of research looks at the determinants of naturalisation, mostly but not exclusively in the North American context (North, 1987; Portes and Curtis, 1987; Yang, 1994; Jones-Correa, 2001; Chiswick and Miller, 2008; DeVoretz and Pivnenko, 2004; Bloemraad, 2002; Rallu, 2011; Liebig and Von Haaren, 2011).² Typically, these studies look at a range of individual characteristics, such as educational attainment, age at migration, years of residence, family situation and, relating to country of origin, economic development, the political situation and toleration of dual citizenship (for a recent comprehensive overview and analysis, see Chiswick and Miller, 2008).

While these studies have contributed to our understanding of the determination of citizenship take-up among immigrants, their comparative scope is surprisingly limited, from the perspective of migration destination countries. Most studies focus on the North American context, with key contributions looking in particular at the case of the US (Yang, 1994; Jones-Correa, 2001; Chiswick and Miller, 2008; see also DeVoretz and Pivnenko, 2004 on Canada). Some notable exceptions exist, though at best they compare a few countries. In the context of the ‘naturalisation gap’ between Canada and the US, for example, important work draws attention to the extent to which naturalisation is institutionally encouraged (Bloemraad, 2002; Picot and Hou 2011). Other studies have investigated the relevance of the citizenship legislation in countries of origin, in particular in relation to toleration of dual citizenship (Jones-Correa, 2001). These examples, however, are exceptions confirming the rule, as we are still a long way off from understanding the relationship between country of origin features, individual characteristics and the institutional opportunity structure in which naturalisation takes place.

In particular, in Europe, where citizenship policies differ substantially (Vink and De Groot, 2010), we see large differences in citizenship take-up rates, with around 80 percent of the foreign-born population naturalised after at least ten years residence in the Netherlands and Sweden, around 65 percent of a comparable group in the UK, 50 percent in France and only around 35 percent in Germany and Switzerland (Liebig and Von Haaren, 2011: 28). The logical question is thus: are these differences in citizenship take-up rates explained by differences in the demographic composition of the immigrant population, or rather by the institutional structure made up of citizenship policies in the countries of origin *and* destination? We cannot answer this important policy-relevant question without an explicit cross-national comparison. Hence, as both the composition of immigrant populations *and* citizenship policies across Europe vary significantly, studies which take the idea of a ‘citizenship constellation’ (Bauböck 2010) seriously, should include a comparative design captures, in addition to the individual characteristics of migrants and aspects of the opportunity structures in destination countries, also the features of rules and practices in origin countries. While advanced methodological techniques, such as cross-classified multi-level analysis (Van Tubergen et 2004) allow capturing such complexities, their application in the field of citizenship studies so far is still the exception, rather than the rule (see e.g. Dronkers and Vink 2012; Vink, Prokic-Breuer and Dronkers 2013).

In terms of the question of the ‘citizenship premium’, much of the recent literature has focused on the question whether citizenship acquisition actually improves labour market performance or whether immigrants who perform better on the labour market are more likely to naturalise.³ In other words, is there unobserved heterogeneity, for example related to ability or motivation of immigrants, which is driving the association between naturalisation and economic performance? This causality question is clearly of key importance and scholars have developed specific methodological strategies depending on the type of available data, such as using instrumental variables (Bevelander and Pendakur 2012;

² The first three paragraphs of this section draw on Vink, Prokic-Breuer and Dronkers (2013).

³ This paragraph draws on Prokic-Breuer, Dronkers and Vink (2013).

Rallu 2011) or a Heckman two-stage model (DeVoretz and Pivnenko 2005) for cross-sectional datasets, or individual fixed effects and longitudinal analysis with panel data (Bratsberg et al 2002; Steinhardt 2012). The common denominator of these studies with a more refined analysis of the relation between naturalisation and economic performance is that when controlling for self-selection the citizenship premium decreases, but –crucially– remains significant (see Scott 2008, for a contrasting view).

While most studies of the relation between naturalisation and integration, have focused on policies and structural context of destination countries, particularly in Europe there is relatively little attention for the role of origin countries in the process of naturalisation and integration of immigrants. Yet it is evident that the ‘origin factor’ matters significantly when assessing the question of immigrant integration. Especially, dual citizenship policies in origin countries should be taken into account as a potential facilitating or restraining factor for the process of integration of immigrants. These dual citizenship policies may be reflected in general rules in constitutions or citizenship laws on the loss of citizenship upon voluntary acquisition of another citizenship (see below), but also in more specific bilateral agreements between countries or rules that only apply to citizens from certain countries (see for example the German exception for EU citizens).

In Europe, as elsewhere, we see that many traditional emigrant countries initially develop a restrictive attitude towards the acquisition of foreign citizenship by the emigrant community, yet later often develop a more tolerant approach. A sending states as Mexico originally have sought to exercise control over the diaspora by penalising the acquisition of foreign citizenship with the loss of the citizenship of origin, yet now recognize that ‘mexicanidad’ can be maintained while acquiring, for example, US citizenship (Fitzgerald 2009: 33). Also in Europe we see an unmistakable trend that states increasingly start to reconceptualize citizenship in a more transnational manner (Vink and De Groot 2010). This affects both European receiving countries, such as Germany, France and Italy, as European sending countries, such as Armenia or Ukraine. In post-Soviet Armenia, for example, the approach to dual citizenship was originally largely restrictive, as a result of concerns that the Armenian naturalised abroad would be able to avoid military service at the time of the conflict over the Nagorno-Karabakh territory. In a more general sense, due to the sizeable diaspora, there have been strong concerns about the interference in Armenian politics and society of foreign citizens, in the case of Armenians who have acquired another citizenship (Makaryan 2013: 6). However, since 2007, dual citizenship has been fully accepted and acquiring the citizenship of another state no longer implies the automatic loss of Armenian citizenship (Makaryan 2013: 15).

Moreover, in addition to these *formal rules*, what matters equally –and has been relatively underresearched so far– is how e.g. governmental actors in origin countries *in practice* stimulate or discourage the acquisition of a foreign citizenship by the emigrant community. For example, in Ukraine, there is an overall negative attitude towards dual citizenship, as a result of concerns about the sovereignty and territorial integrity of Ukraine vis-à-vis Russia (Shevel 2010: 1). However, more recently the attitude against dual citizenship has softened and in practice allows many Ukrainian citizens who acquire a foreign citizenship to retain their citizenship of origin (Shevel 2010: 11). A similar trend can be observed in Georgia, where in 2004 a special ‘dual citizenship commission’ was formed to create a more liberal framework for dual citizenship, in response to demand from the sizeable Georgian diaspora (Gugushvili 2012: 9). However, in Georgia, as in Ukraine, the legal framework remains unclear as to the extent to which dual citizenship has been embraced or not and, at times, seems to be applied in a problematic manner in cases of political controversy (Gugushvili 2012: 23).

There are two reasons for why dual citizenship policies in origin countries should be taken into account, from the perspective of the integration of immigrants in destination countries. First, being able to retain the citizenship of origin generally can be expected to increase naturalisation rates among immigrant groups. Jones-Correa (2001), for example, demonstrates that changes in citizenship policies in Latin American countries in the 1990s had a positive effect on naturalisation rates among immigrants groups in the US from countries that recently allowed dual citizenship. Vink et al (2013)

demonstrate that in 15 European countries the possibility of retaining the citizenship of origin, depending on citizenship law in destination and origin countries, positive correlates with the propensity to naturalise. In Portugal, for example, low naturalisation rates among the Ukrainian community are mainly attributed to the risk of losing Ukrainian citizenship (EUDO CITIZENSHIP 2013b: 13). This indicates that, in as far as there has been a softening of the negative attitude towards dual citizenship in Ukraine (see above), this has not yet translated into a proactive policy, for example through the diplomatic representation in Portugal, to encourage the naturalisation of Ukrainians in Portugal (but see eg ACIDI 2011). Mazzolari (2009: 187) also links the increased propensity to naturalise to improve integration outcomes: ‘Immigrants coming from countries that have recently allowed dual citizenship are found not only to be more likely to naturalise but also to experience relative employment and earnings gains and to lower their reliance on welfare.’ This relates to the benefits of naturalisation, such as increased employability, as discussed below.

Second, there is the question of how retaining the citizenship of origin influences the integration process. While there is some limited work on the relation between dual citizenship and sociocultural integration and political participation (e.g. eg. Staton et al 2007; Dagevos 2008; Ersanilli and Koopmans 2010), there is a much more limited literature on the relation between dual citizenship status and socioeconomic integration. As a result, few studies on the relation between naturalisation and economic integration, or other integration indicators, employ explicit methodologies that allow for the identification of the influence of the origin countries. As argued by Prokic-Breuer, Dronkers and Vink (2013), the literature on citizenship and integration has developed methodologies mainly aimed at detecting *whether* destination country citizenship matters, which may not necessarily be suited to analysing the question *to whom* citizenship matters.

3. Discussion of the literature: focus on the role of the country of origin⁴

This section outlines the actors involved in the process of immigrant integration in destination countries and identify the diverging and converging interests of the sending and receiving countries, as well as the strategies of the sending societies to push their interests. We start by discussing the relation between citizenship and integration and then go into the question to what extent and how actors from origin countries can encourage the access to citizenship of migrants in destination countries.

The relation between naturalisation and the structural integration of immigrants (i.e. their inclusion into existing social *structures*, such as the labour market) has received increasing scholarly attention since Chiswick’s (1978) seminal study of the effects of citizenship acquisition on earnings of foreign-born men in the US. While the literature is marred by differentiated findings, depending on choice of destination country, immigrant group, dependent variable (e.g. employment status or income) and methodological design (e.g. based on cross-sectional or longitudinal data), it is fair to say that the consensus is that overall naturalisation has a strong potential to improve the economic well-being of an immigrant (see e.g. Bratsberg et al, 2002; DeVoretz and Pivnenko 2005; Mazzolari 2009; OECD 2011; Rallu 2011; Bevelander and Pendakur 2012; Steinhardt 2012).

In as far as a ‘citizenship premium’ is observed in the literature, the main reasons are seen as threefold: a) *unrestricted access* to the labour market: in many countries citizenship is still a requirement for certain jobs, particularly in the public sector; b) *better employability*: the absence of administrative costs associated with work and residence permits makes it easier to hire naturalised immigrants; and c) citizenship acquisition as a *signalling device* of integration: naturalisation indicates a clear commitment of the immigrant to remain in the country of residence, hence lowering the uncertainty of the employer, and formal equality also decreases (though does not prevent) the risk of discrimination. On the whole, naturalised immigrants thus are generally seen as more likely to have

⁴ This section draws on Vink and Schmeets (2013).

paid employment and less likely to be unemployed, as well as more likely to have higher earnings due to better occupational status (Liebig and von Haaren, 2011).

When we look more specifically at the literature on the relation between *dual* citizenship status and immigrants integration, what strikes is that the relevance of retaining origin country citizenship is framed virtually exclusively as a naturalisation effect: ‘Immigrants coming from countries that have recently allowed dual citizenship are found not only to be more likely to naturalise but also to experience relative employment and earnings gains and to lower their reliance on welfare’ (Mazzolari 2009: 187). In other words, Mazzolari compares those naturalised immigrants with non-naturalised immigrants, but does not compare naturalised immigrants *with dual citizenship* with naturalised immigrants *without dual citizenship* (cf. Liebig and Von Haaren 2011: 30). One important reason for this limited analysis of dual citizenship is data availability: while national registration data and international surveys (such as the European Social Survey and the Labour Force Survey) include valuable information on destination country citizenship, they seldomly include data on retention of origin country citizenship.

The key ‘citizenship’ question is thus often seen as whether an immigrant has destination country citizenship or not (see e.g. OECD 2011), whereas keeping the origin citizenship is seen as relevant only in terms of the extent to which it influences the propensity to naturalise. There is some limited work, though with rather mixed findings, on the relation between dual citizenship and sociocultural integration and political participation (e.g. Staton et al 2007; Dagevos 2008; Ersanilli and Koopmans 2010). Yet overall, the literature on the ‘citizenship premium’ treats dual citizenship as largely irrelevant from the perspective of affecting the potential pay-off of naturalisation, in terms of improving integration outcomes.

In other words, the default assumption seems to be that what matters for the integration of an immigrant is destination country citizenship, not origin country citizenship and in as far as the latter is relevant, it is because of the relevance for the propensity to naturalise. However, to what extent this assumption is empirically valid, is a largely unresearched question. While this is a question that often arises in political debates on dual citizenship (see e.g. Schmeets and Vink 2011, on the Netherlands), in academic studies the question has been mainly left unaddressed. From the perspective of this brief literature review, *the main identifiable gap in the literature thus relates to the under-researched issue of the relevance of retaining origin country citizenship for the relation between naturalisation and immigrant integration.*

In the next section we discuss two sides to this under-researched question: first, the question to what extent dual citizenship policies in origin countries affect the propensity to naturalise, for migrants in destination countries; and, second, the question to what extent the ‘citizenship premium’ is affected by an increased propensity to naturalise for immigrants from origin countries that allow dual citizenship.

4. Proposed theoretical framework

Citizenship is a *legal status and expresses a relationship between an individual and a state that entails specific legal rights and duties.* As for the rights attached to citizenship, the most important right associated with citizenship is the protection by the state and unrestricted access to the territory. Even if alternative permanent residence statuses, such as the green card in the US, may provide sufficient security of residence and strong protection against expulsion, ‘naturalisation’ ultimately transforms a foreigner into a citizen. Citizenship provides additional privileges, such as diplomatic protection, the right to vote, and access to public sector jobs, to name a few.

*Citizenship of origin and the naturalisation propensity*⁵

Citizenship laws vary greatly between countries and thus may well explain differences in terms of naturalisation rates between similar immigrant groups. Typically, we see important differences between immigration countries, such as Canada and the United States, and most European countries. In the North American context, birth in the territory gives automatic access to citizenship to the second generation and naturalisation is seen as a natural part of the integration process that follows immigration. In most European countries, by contrast, citizenship acquisition has for a long time been dominated by descent-based transmission from one generation to the next and therefore was never very accessible to immigrants. However, within Europe we see a large variety of policies that regulate access to citizenship and some countries, notably Ireland, the United Kingdom and France, have stronger *ius soli* traditions, which is partly still reflected in citizenship policies of today (see for example, Baubock et al., 2006; Brubaker, 1992; Janoski, 2010; Vink and De Groot, 2010; Weil, 2002).

Aspects of citizenship laws that influence the ‘accessibility’ of citizenship for immigrants are the conditions for ordinary naturalisation, such as residence requirements, dual citizenship toleration, language and integration requirements, fees, and administrative discretion. For children of immigrants and subsequent generations, *ius soli* birthright also matters greatly as this determines whether they are included at birth as full members of the political community.

Although the acquisition of citizenship can offer significant benefits, we know that some immigrants naturalise and other do not. Why is that? Yang (1994: 457) argues that immigrants’ perceptions of the costs, benefits and meaning of naturalisation are conditioned principally by the socio-economic situation in their countries of origin: insecurity, poor economic conditions and low standards of living may deter immigrants from desiring to return to their homelands. In other words, citizenship provides security, but the utility of naturalisation is appreciated differently among immigrant groups, depending on their country of origin context (Jasso and Rosenzweig, 1986: 303; Bueker, 2005; Logan et al, 2012). Based on this reasoning, one would expect, certainly in developed European countries (as in North America), that the citizenship take-up rate is higher among immigrants from less developed or lower-income countries. The context of country of origin is thus, first and foremost, relevant in terms of motivating the demand for naturalisation from an immigrant’s perspective.

Based on the literature, one would assume that differences will still exist among immigrants in their perceptions of the chances of life improvement secured by citizenship, even within groups coming from countries of origin with relatively similar levels of development. If seen as a life-course event (Tucci, 2011), citizenship take-up is likely to be influenced by expectations and ambitions related to an individual’s life situation. For example, we expect that residence matters: the longer an immigrant resides in a country, the higher the expectation of legal incorporation in the host country community. Existing research has shown this to be one of the best individual-level predictors of naturalisation (e.g. Bueker 2006: 132; Dronkers and Vink 2012: 404). Additionally, immigrants who are married and those who have children may also be more strongly motivated to acquire citizenship, as fulfillment either of their own life-course project, or that of their spouse and/or children (who may be left behind in the country of origin). Another important individual characteristic which can be assumed to positively affect the ability to qualify for citizenship is language competence. Jasso and Rosenzweig (1986: 305) observe that, for the USA, ‘coming from a country in which English is an official language facilitates naturalisation, for which knowledge of the English language is a requirement.’ Yang (1994: 468) confirms these findings and factors such years of residence, being married and having children, as well as speaking the language of the host country would be expected to be included in most micro-level investigations (e.g. Yang, 1994; Chiswick and Miller, 2008; Dronkers and Vink, 2012).

⁵ This section draws on Vink, Prokic-Breuer and Dronkers (2013).

Crucial determinants, in line with the literature, are socioeconomic factors such as human capital (educational attainment, occupational status) and employment status. There are two key reasons why one would expect that higher levels of human capital would increase the propensity to naturalise (Yang, 1994). First, as to human capital, as better-educated or more highly skilled persons are more likely to qualify for the type of public sector jobs for which citizenship may be a precondition, they are more likely to capitalize on this citizenship bonus and thus to invest in the naturalisation process. The same goes for employment: only those immigrants active on the labor market are likely to expect a return on their investment in the naturalisation process, for example in terms of wage increase. The second reason is related to the selectivity of the naturalisation process, which may deter immigrants who decide not to bother investing in a procedure that looks very complex and is difficult to understand. Less educated or skilled immigrants may be deterred more easily by the seeming complexity of the naturalisation process. Hence, following both arguments, one would expect that immigrants with higher levels of human capital and employed immigrants are more likely to acquire the destination country citizenship. It is often hypothesised that 'social capital' also matters, for example in terms of immigrant networks and access to information on naturalisation procedures, but the evidence there is less systematic.

However, whereas most single-destination country studies have stopped here, logically looking only at the variation in the origin country citizenship policies of the immigrant population, particularly in a European context citizenship policy in the destination context is crucial. Citizenship policies set the conditions under which immigrants can naturalise, for example the required years of residence, the requirement to renounce one's previous citizenship, language and civic integration tests and fees. In Europe, we see large differences in terms of residence requirements, varying from three to twelve or more years (until 1999 even fifteen years in Germany) as well as fees, ranging from no costs whatsoever to nearly two thousand euro in Austria (Goodman 2010). Eligibility criteria such as residence requirements make the acquisition of citizenship a rather more or less realistic prospect within a foreseeable future. We expect that immigrants are more likely to acquire destination country citizenship in countries with a citizenship law that makes citizenship relatively accessible.

Aside from individual characteristics and legal requirements in the destination country, the legal framework set by the citizenship laws in the countries of origin and destination provides the opportunity structure with regard to access to citizenship. In the literature, most research has gone out to citizenship policy in the origin country, particularly with regard to the possibility of retaining one's previous citizenship when acquiring a new citizenship. Whether citizenship can be retained will depend on the combined outcome of the citizenship legislation in both the countries of origin and destination. In order to avoid conflicting allegiance or loyalties, many countries have a rule that implies the loss of the citizenship of origin upon the voluntary acquisition of another. Some countries also require immigrants to renounce their citizenship of origin, if they do not lose it automatically. In Europe, countries such as Austria, Denmark and Norway have a strict renunciation requirement (Vink and De Groot 2011). This leads to the expectation that immigrants who can retain their citizenship of origin are more likely to acquire destination country citizenship. It should be noted, however, that the findings in the literature on this point are rather ambiguous as some studies which hypothesize a positive effect of dual citizenship toleration in the origin country, find in fact the opposite (see Jones-Correa 2001; Mazzolari, 2009; but compare Yang, 1994; Dronkers and Vink 2012; Logan et al, 2012). Such contradictory findings are likely related to the differences in methodological design, for example with regard to sample size and definition of immigrant population (e.g. whether or not to include the second generation).

Third, with regard to dual citizenship policies, while the option to retain dual citizenship may be expected in general to affect the decision on whether to naturalise, one may assume that the absence of the dual citizenship option in particular affects immigrants from highly developed countries. After all, not only are immigrants from less developed countries in general more motivated to naturalise, thus more willing to accept the potential cost of breaking off the legal link with the country of birth, but

those from more developed countries also have more to lose, so to say, in terms of the value of citizenship. It would thus be intuitive to expect a stronger positive relation between dual citizenship tolerance and naturalisation among immigrants from highly developed countries.

Citizenship of origin and the naturalisation premium⁶

Economic studies have shown that citizenship matters in particular for the employability of immigrants and their incomes. Naturalisation increases employability as employers take into account the administrative costs of hiring foreigners and verifying rights to work (Bevelander and DeVoretz, 2008; Bratsberg et al, 2002). Naturalisation can also be a ‘signalling device’ to employers about the better integration of potential workers, as citizenship is often associated with better language mastery (Liebig and Von Haaren, 2011: 17). Finally, while foreigners may even have the right to participate in political elections, at local or regional level, suffrage in national elections remains largely exclusive to citizens, with a few exceptions (notably Brazilians in Portugal and Irish and Commonwealth citizens in the UK, as well as British citizens in Ireland).

In effect, the mainstream literature on naturalisation and economic integration assumes what might be termed an ‘assimilationist’ perspective on dual citizenship and naturalisation. Classically, assimilation is seen as a process by which immigrant groups fully integrate themselves into a new country, ranging from cultural assimilation to structural assimilation (Gordon 1964). Since the move to obtain citizenship indicates a commitment to stay in the destination country and requires a minimum of acculturation, this may be seen as an indicator of assimilation (White, Biddlecom and Guo 1993: 99). From this assimilation perspective, the acquisition of citizenship of the destination country is thus an important step on the way to the civic and structural assimilation into the institutions of the host society. While naturalisation may not fully overcome the disadvantageous situation immigrants often find themselves in, caused by racial discrimination, language difficulties or cultural habits which set off immigrants against the native population, it is deemed to narrow the employment gap between immigrants and natives by making the first similar to the latter in terms of legal status.

There are at least two opposing views to such a narrow perspective which only considers the relation between citizenship and integration from a destination country perspective. These views should be seen as proto-theories, at best, rather than well-established theories which can provide a ready-made framework for a systematic analysis. We outline these contrasting views in this section and come back to them in the concluding remarks of the report.

For a first alternative view we look at *segmented assimilationist theory*. This theory was originally developed to understand the different patterns of adaptation that emerge among second generation immigrants and argues that ‘joining those native circles to which they do have access may prove a ticket to permanent subordination and disadvantage’ (Portes and Zhou 1993: 96). The idea behind this is that when immigrants and their children ‘enter the bottom of the ethnic hierarchy of drastic social inequality, the forces of assimilation come mainly from the underprivileged segments of this structure, and this is likely to result in distinct disadvantages, viewed as maladjustment by both mainstream society and the ethnic community’ (Zhou 1997: 999).

When we connect this to the debate on citizenship and integration, segmented assimilation theory thus points at the fact that the integrative (assimilationist) potential of naturalisation may be undermined by persisting disadvantageous group ties. While the most detrimental factors for limited assimilation are usually seen in racial stratification, spatial segregation and cultural patterns of social relations, with regard to dual citizenship one might argue that it signals the ambiguous status of the immigrant of being caught between the contexts of the ethnic group and the destination country. Hence, from this perspective, we would expect that the presumed labour market benefits of

⁶ This section draws on Vink and Schmeets (2013).

assimilation through naturalisation are negatively conditioned by maintaining formal links with the origin country. The main reason for this is that dual citizenship signals hesitation towards full assimilation on the part of the immigrant and thus a stronger disposition to hold on to their ethnic context. In other words, from a segmented assimilationist view, we expect the citizenship premium to be higher for those immigrants who naturalise while renouncing their citizenship of origin.

Alternatively, a *transnationalist perspective* endorses the idea that multiple forms of membership are a reality in a mobile world (e.g. Spiro 2007). As Portes (1999: 472) observes: “Instead of being a denationalizing force conspiring against the integrity of the host society, transnational activities can actually facilitate successful adaptation by providing opportunities for economic mobility and for a vital and purposeful group life.” From this perspective, the continued link to the country of origin, through dual citizenship, strengthens an immigrant’s social capital and thus not only does not preclude, but even strengthen the integration into the country of residence.

5. Case studies on dual citizenship

Case study I: assessing the impact of (dual) citizenship policies on immigrant naturalisation rates

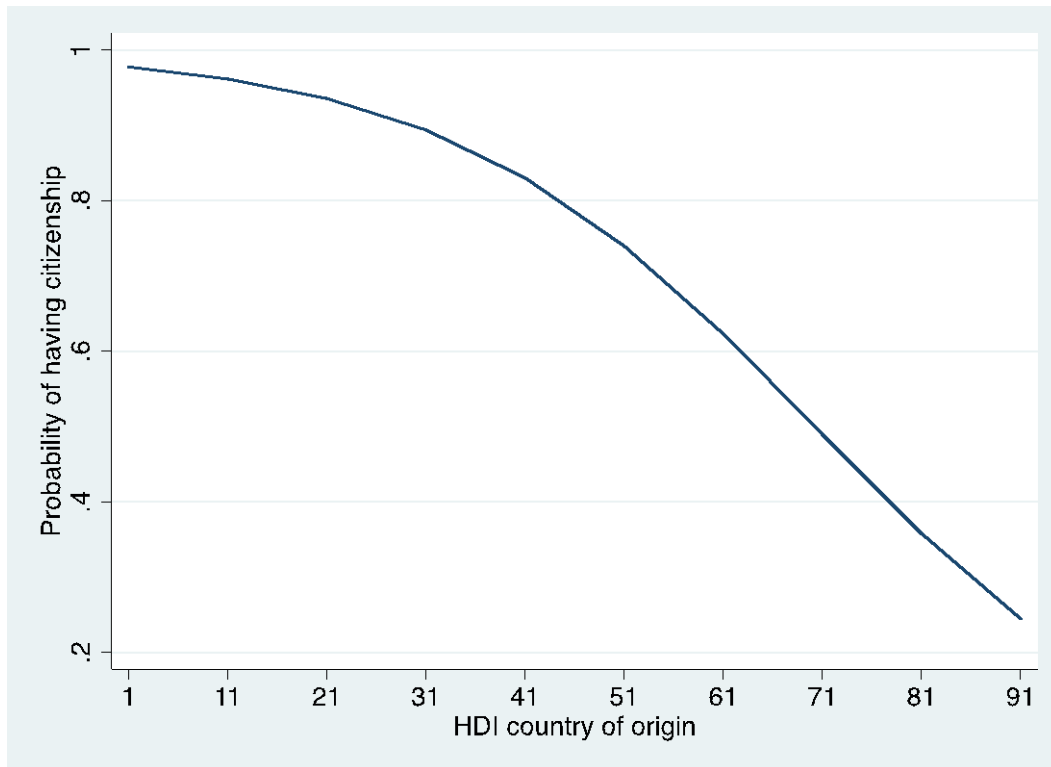
This section summarizes the results of a recent comparative study by Vink, Prokic-Breuer and Dronkers (2013) on the effects of citizenship policies in European countries on the propensity to naturalise, taking into account not only characteristics of individuals, but also their origin country features. In particular, the study looks at the relevance of destination country policies *in the context of origin country features*, such as the level of development of the origin country, as well as dual citizenship policies. The study is based on a sample of 7.489 foreign-born residents in 16 European countries, collected by the European Social Survey. The study is innovative because, in as far as any comparative research has been done on the effects of destination country policies, these have concluded that indeed ‘policy matters’ (Bloemraad 2002; Reichel 2011; Dronkers and Vink 2012). However, so far no research has been done on the question *to whom* citizenship policy matters more. Later in this section, we also introduce data from a new ‘global dual citizenship database’ (Vink, De Groot and Chun 2013), which collects information on dual citizenship policies in all countries of the world, since 1960.

Vink, Prokic-Breuer and Dronkers (2013) hypothesise that the inclusiveness of citizenship policy matters in particular to those immigrants who are strongly motivated to naturalise, primarily those immigrants coming from less developed countries. After all, whereas the first group has a ‘valuable’ citizenship to fall back on and will thus continue to have a viable return option, the latter is likely to see citizenship acquisition as part of a life course project aimed at permanent settlement in a new country. While this need not necessarily rule out the idea of return to the home country, acquiring citizenship of the destination country is likely to be perceived as a key precondition for such return to the origin country, given that citizenship guarantees continuous mobility. Hence, these immigrants will be affected more significantly by policies which make destination country citizenship either not accessible within a reasonable period after arrival in the country due to prohibitive residency requirements or difficult or even impossible to acquire due to prohibitive and discretionary assimilation requirements.

Vink, Prokic-Breuer and Dronkers (2013) find that the level of development of the country of origin is a crucial factor in understanding the relationships between on the one hand citizenship policies and on the other individual-level features and citizenship take-up rates in Europe. To arrive at this conclusion, the analysis first shows that demand for citizenship is influenced primarily by where immigrants are from. The level of human development of countries of origin accounts for the vast difference among immigrants in their propensity to naturalise. Immigrants in Europe coming from

medium and under-developed countries are on average 2.5 times more likely to have citizenship than those originating from highly developed countries, including EU member states and other OECD countries (Figure 1). These findings are in line with the literature and can be understood in terms of the perceived payoff attached to citizenship. Acquiring destination-country citizenship has a much higher potential pay-off for immigrants originating from low-income countries than for those coming from developed and more prosperous societies. In this context, securing residence status in a country which offers a vast increase in security and life chances, is of crucial importance.

Figure 1. Probability of having destination country citizenship by level of development of origin country

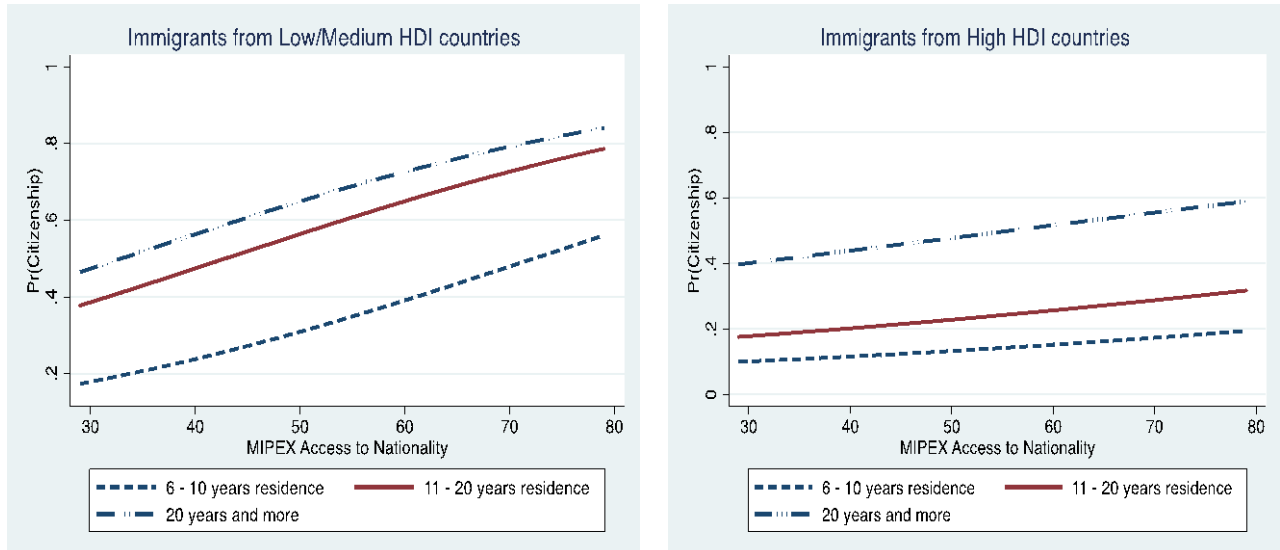


Source: Vink, Prokic-Breuer and Dronkers (2013).

Crucially, because large differences exist between immigrants in their motivation to naturalise, Vink, Prokic-Breuer and Dronkers (2013) show that the impact of citizenship policies varies for these two groups. The legal framework set by the citizenship laws in the countries of origin and destination accounts for a difference in naturalisation rates, yet only for immigrants from less developed countries. In fact, not only are these immigrants twice as likely to naturalise in countries with very open citizenship policies, but they are also the ones particularly affected by these policies. Vink *et al* (2013) demonstrate the relevance of policy by introducing an indicator that captures the openness of citizenship policy in the destination countries for first generation immigrants, with regard to residency and integration requirements for naturalization (MIPEX Access to Nationality). They observe that an increase of 1 unit on the MIPEX scale leads to a 2.4 percent increase in the likelihood of having destination country citizenship. This finding is illustrated by Figures 2a and 2b, which portray these differences against the time dimension, length of residence, for immigrants from less developed countries (Figure 2a) and those from highly developed countries (Figure 2b). The steepness of all three lines indicates the degree to which policy matters for three groups of immigrants: i) those that have resided in the country between six and ten years; ii) those that have resided between 10 and 20 years; and iii) those that have resided more than 20 years. Only in the case of immigrants from under-developed countries do we observe a sharp increase for all three groups in the citizenship take-up

rates. For immigrants from highly developed countries the positive relation between citizenship policy and naturalization rates is weaker, as indicated by the steepness of the lines.

Figures 2a and 2b. Predicted probability of having destination country citizenship by MIPEX Access to Nationality (by years of residence in destination country)



Source: Vink, Prokic-Breuer and Dronkers (2013).

Second, the analysis by Vink, Prokic-Breuer and Dronkers (2013) shows that this origin factor is also related to the role of individual characteristics in immigrants' decisions to naturalise. Differentiated analyses of citizenship take-up among two immigrant groups, from highly developed (incl. the EU) and from medium/under-developed countries, show that different determinants play a role for different groups. Socio-economic features such as human capital (e.g. language skills) and employment status indeed play significant roles in the take-up of citizenship, but only for immigrants from less developed countries. Historical and cultural ties between the origin country and the destination country also matter, for example in the context of former colonies.

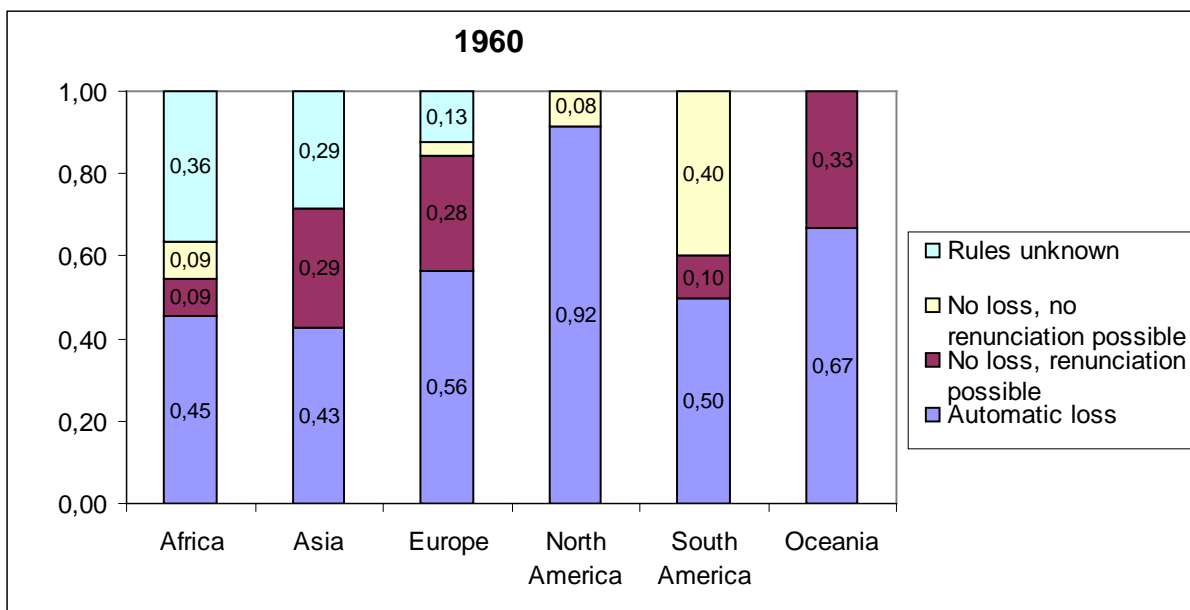
Case study II: charting dual citizenship policies worldwide in the last 50 years

The relevance of dual citizenship thus needs to be understood in this context of differentiated naturalisation dynamics. In Europe, migration-receiving countries are increasingly unlikely to demand the renunciation of previous citizenship as a condition for naturalisation (Vink and De Groot 2011; updated in Vink and De Groot, forthcoming). This has to do with the fact that, in a world of migration where children of mixed-nationality couples increasingly often have dual citizenship at birth, it makes increasingly less sense to require from a specific group of immigrants that they renounce their citizenship of origin, when they naturalise. By 2010, of all EU member states, Austria, the Czech Republic, Denmark and Estonia are the only countries which still have an uncompromised renunciation demand in their citizenship legislation. Since the early 1990s, countries such as Italy, Finland, Luxembourg and Sweden abolished the renunciation demand altogether. Other countries, such as the Netherlands, currently allow for so many exceptions to the general rule that most naturalised citizens do not have to renounce their previous citizenship (De Groot and Vink 2008; Van Oers et al. 2006: 419). The new German naturalisation regime is also significantly more tolerant towards double citizenship than was previously the case, though still generally restrictive with regard to dual citizenship of specific categories of immigrants, as well as for the children of immigrants who can acquire German citizenship at birth but still have to make a decision between German and foreign

citizenship between the age of 18 and 23 (Hailbronner 2006b: 232). Spain formally has a renunciation demand but does not enforce it (Chopin 2006: 251).

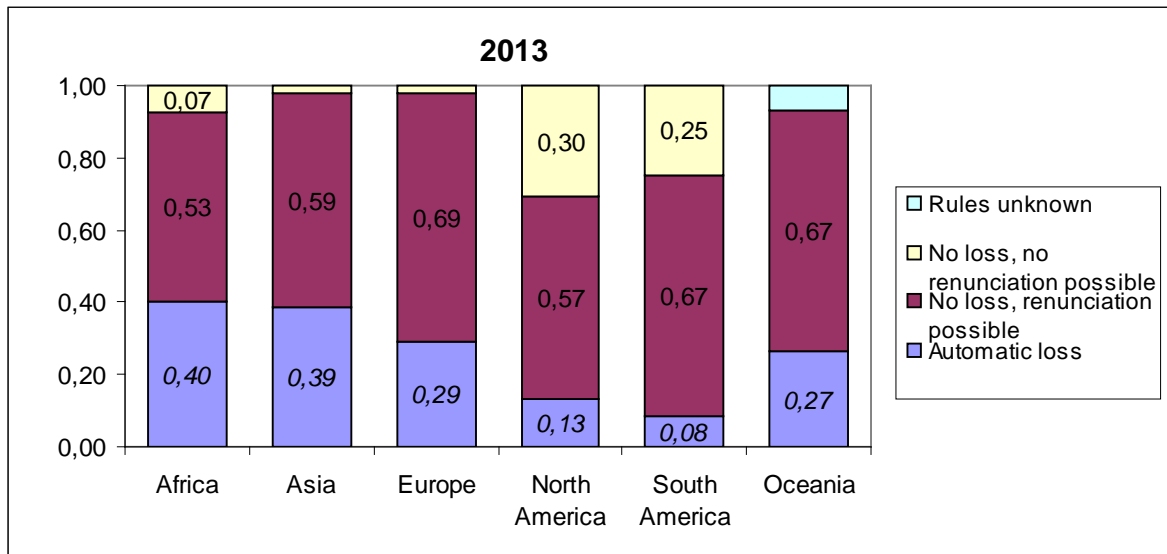
The attitudes towards dual citizenship of emigrants are perhaps most clearly manifested by the rules that exist in states with regard to the loss of citizenship after a citizen voluntarily acquires the citizenship of another state. Basically, countries can be divided in three categories, depending on the type of general rule they apply (though, admittedly, bilateral agreements between countries may provide different rules for specific groups). Traditionally, in many states dual citizenship was perceived negatively and such states provide accordingly in their national legislation that citizenship is lost automatically upon the voluntary acquisition of another citizenship. By contrast, in states where dual citizenship is not perceived to be problematic, no such rules on loss of citizenship exist though citizens are allowed to voluntarily renounce their citizenship. Thirdly, in a minority of states, citizenship is not automatically lost and renunciation is also not possible.

Figure 3. Worldwide rules on loss of citizenship after voluntary acquisition of other citizenship: rules in 1960, by continent



Source: Vink, De Groot and Luk (2013)

Figure 4. Worldwide rules on loss of citizenship after voluntary acquisition of other citizenship: rules in 2013, by continent

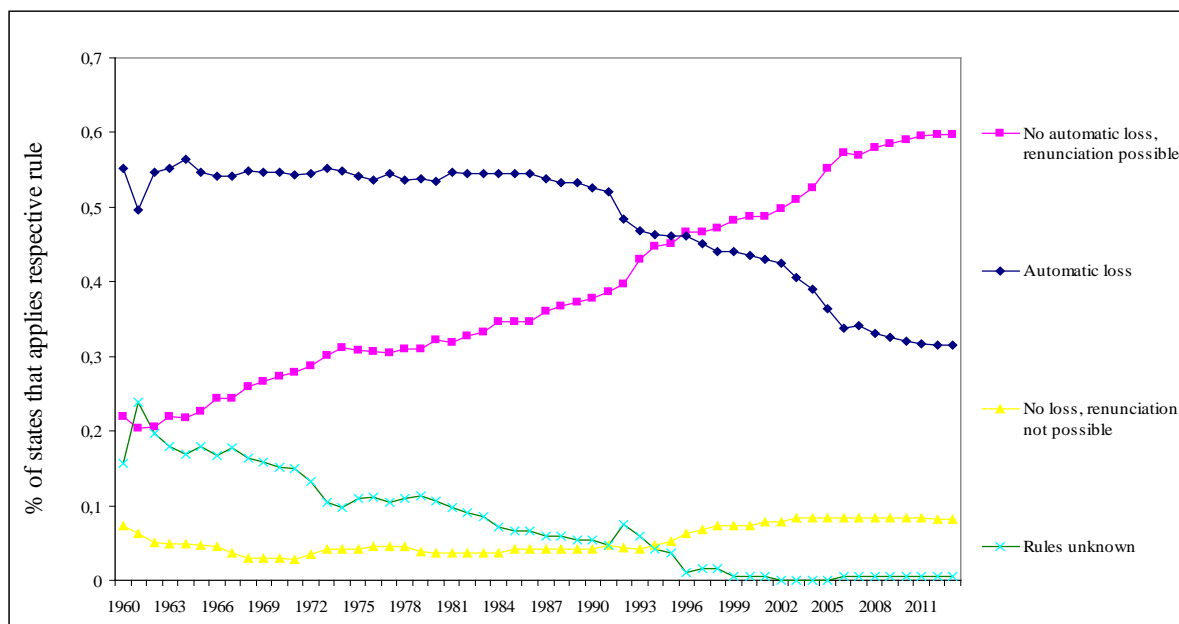


Source: Vink, De Groot and Luk (2013)

Vink, De Groot and Luk (2013) have charted these rules for all countries in the world, from 1960 to 2013, which provides a unique overview of the development of origin country citizenship policies over the last half century. As Figure 3 highlights, in 1960 the majority of countries the voluntary citizenship of another country implied the automatic loss of the citizenship of origin.⁷ Particularly interesting is the South American content, where in 1960 around half of the countries applied a rule of automatic loss and in most other countries, there was no automatic loss but citizenship could also not be voluntarily renounced. By 2013, however, almost 90 percent of countries on the South American content applies the rule which is currently the most popular around the world, namely that there is no automatic loss, but individuals are allowed to renounce their citizenship, if they choose to do so (Figure 4). These changing rules clearly reflect a different approach towards dual citizenship and is normally linked to the desire of migration sending countries to maintain the links with the emigrant community (Jones-Correa 2001).

⁷ It should be kept in mind, when comparing Figure 3 and Figure 4, that the number of independent countries in the world was much smaller in 1960 than in 2013. There are also a number of countries on which the authors did not manage to find sufficiently reliable information on the applicable rule in 1960.

Figure 5. Worldwide rules on loss of citizenship after voluntary acquisition of other citizenship: trend 1960-2013



Source: Vink, De Groot and Luk (2013)

Figure 5 summarizes the main trends and unequivocally shows the increasing acceptance of dual citizenship across the globe. Whereas in the early 1960s in more than 50% of states voluntary acquisition of another citizenship caused the automatic loss of citizenship of a state, in 2013 this has decreased to less than 35 percent. By contrast, we observe the opposite trend for states where no automatic loss occurs, but renunciation is possible: currently around 60 percent of states falls in this category. The percentage of states where loss does not occur and renunciation is not possible remains fairly stable around, or just below, the 10 percent.

Do these dual citizenship rules matter? For that question we go back to the analysis by Vink, Prokic-Breuer and Dronkers (2013), who show that dual citizenship policies do matter. Immigrants who can retain their citizenship of origin are 40 percent more likely to acquire destination country citizenship. These results are controlled for individual factors such as gender, age, education and years of residence, as well as other origin countries (e.g. Human Development Index and whether immigrants come from former colonies or territories) and destination country features (GDP per capita and citizenship policy). However, there is no empirical support for the intuitive hypothesis that dual citizenship matters more for immigrants from highly developed countries than for those from less developed countries. The latter in general have a significantly higher propensity to naturalize, but this does not seem to be affected particularly by dual citizenship policies.

6. Conclusions

To conclude, immigrants coming from highly developed countries are not only less likely to naturalise, but whether or not they do so also seems to depend on few factors. If immigrants from highly developed countries naturalise at all, then years of residence play a crucial role in the process. For these immigrants, socio-economic and demographic features only play a marginal difference in their decision to naturalise, compared to the relevance of the time spent in the country of destination. In other words, not only does it matter where an immigrant is from, in terms of the propensity to naturalise, but it also matters significantly where an immigrant goes, in terms of the institutional context of the citizenship policy in the destination country. However, crucially, while destination

country citizenship policies clearly affect naturalisation rates among immigrants, their relevance is conditioned by the kind of origin country background of the immigrants involved. Hence, for the question of how much it matters where one goes, it matters significantly where one is from.

The report raises two strands of issues, related to the actions and strategies of *actors* in origin countries, which could affect migrants' integration in destination countries.

First, dual citizenship policies, understood as the constellation of destination and origin country rules, affect the propensity to naturalise across the board, though within the context that the motivation to naturalise will depend also on other factors related to the socioeconomic background of the origin country, as well as individual level factors. From this perspective, the actors in the sending countries who can exercise the most direct relevance on the integration of migrations in destination countries, through the acquisition of citizenship, are the national legislators who regulate what happens upon the voluntary acquisition of another citizenship. The summary results of a worldwide survey presented in this report clearly demonstrate that these actors in origin countries increasingly often accept dual citizenship as a natural phenomenon in an increasingly transnational world and, thus, abandon previously restrictive rules. At the same time, even though by now a clear minority, there are still a significant number of states in the world where the phenomenon of dual citizenship is still actively countered through restrictive citizenship rules. In a survey among sending country legislators, but also diaspora interest groups, in a diversity of geographical, socioeconomic and legal context, these changing attitudes towards dual citizenship could be probed further.

Second, following up on the previous point, the report highlights a major issue which has so far received relatively little attention, at least in the surveyed literature on citizenship acquisition and socioeconomic, political and sociocultural integration of migrants in destination countries. This relates to the under-researched issue of the relevance of retaining origin country citizenship for the relation between naturalisation and immigrant integration. In much of the, economically oriented, literature the default assumption seems to be one of assimilationism: what matters for integration is destination country citizenship, not origin country citizenship. However, apart from affecting the propensity to naturalise, dual citizenship rules in origin countries by definition also affect the continuing relation of the naturalised migration, after having acquired destination country citizenship. How does this continuing tie with the origin country, expressed in a legal status or not, affect the migrants' integration in the destination country? Apart from the occasional case studies of specific destination and origin country constellations (e.g. between Mexico and the US, see Fitzgerald 2008), there is relatively limited systematic evidence on how origin country citizenship affects what is often seen as a 'citizenship premium' in destination countries. Moreover, in a related manner, even if origin countries broadly accept dual citizenship through their citizenship legislation, a wide variety of diaspora politics is foreseeable, in terms of the efforts by government officials linked to diplomatic representation who may reach out to the emigrant community to either stimulate or discourage them to naturalise in the destination country. By keeping a formal link with the origin country, citizenship policy is often seen as an important tool to maintain the ties with the economically significant diaspora. Such politics may or may not interfere in the migrants' integration process in the destination country. Hence, even if legislators broadly accept dual citizenship for pragmatic reasons of keeping the bond alive with the emigrant community, how do they view this continuing legal bond in terms of political, social and economic obligations, both of the sending country and the individual migrant? And, how do individual migrants view these continuing legal ties with the origin country?

While the viewpoint that citizenship can serve as a tool for integration is increasingly accepted, in academia as well as in national politics, now that citizenship policies in origin countries become increasingly tolerant towards dual citizenship, in Europe and beyond, as demonstrated in this report, there is a self-evident relevance to further exploring how maintaining origin country citizenship interacts in the citizenship-integration nexus in the destination context. The role of relevant actors in sending countries, such as legislators and diaspora group representatives, will be crucial to understand how this interaction plays out, across various constellations of sending and destination countries.

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