

# Dual citizenship: the top-down versus the bottom-up approach

*How the two approaches come to different conclusions regarding the consequences of dual citizenship for the state of residence*

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Student: Eline den Otter (s1413929)  
Supervisor: Dr. Jo van Cauter  
Second reader: Prof. dr. Paul Nieuwenburg  
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**Universiteit  
Leiden**  
Institute of  
Political Science

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## Introduction

On 11 March 2017, the Turkish minister Kaya was denied entry to the Netherlands, because the Dutch government did not want foreign ministers campaigning on Dutch territory. She was planning on giving a speech in Rotterdam for an audience of Turkish-Dutch citizens as a campaign activity for a referendum that could change the Turkish constitution and give president Erdogan almost unlimited power over the judiciary and legislative branches of government. For example, governing by decree instead of parliamentary procedures would be made very easy. In other words, if the referendum passed, Turkey would move away from democratic values, like participation of citizens and the system of checks and balances. Those values matter greatly for the Netherlands and its citizens, yet a lot of Turkish-Dutch citizens have ultimately voted against those values in the referendum. This fact has caused a debate regarding the social integration and adaptation of norms and values by people that hold dual citizenship (also called dual citizens) (NOS, 2017a, 2017b).

Fouad Belkacem was one of the millions of dual citizens in the world. He was Belgian because he was born on Belgian soil, and he was Moroccan by descent. On 23 October 2018, his Belgian citizenship was taken from him. His Moroccan citizenship remains. The Court of Appeal named as main reason for this drastic action that, by his affiliation with Sharia4Belgium and his actions like calls for violence against non-Muslims and recruiting for armed jihad in Syria, mister Belkacem had failed in fulfilling his obligations as a Belgian citizen towards the Belgian state (NOS, 2018).

These are just two of the many news items from recent years in which the theme of dual citizenship is featured. In a nutshell, they contain the practical implications of theories and

arguments regarding dual citizenship. The public debate regarding dual citizenship, sparked by events like these two, has also been conducted in academic circles.

The central question of this thesis is: do the top-down and the bottom-up approach come to the same conclusion regarding the consequences of dual citizenship for the state of residence? In order to answer this question it is important to first establish what citizenship is and how one can obtain it. Chapter one deals with these two questions. It shows that there is consensus in academic literature that citizenship entails three dimensions: a legal dimension, a participatory dimension and a collective identity dimension. The two dominant notions of citizenship, the republican and liberal ones, each emphasize a different dimension of citizenship. As discussed in chapter 1.1, the republican notion emphasizes the collective identity dimension and the liberal notion emphasizes the legal dimension. These differences translate into different expectations regarding the role citizens should play in society. The republican notion expects a thick, active role. The liberal notion expects a thin, passive role. Then, answering the second question, citizenship could be obtained via two main ways. One could obtain (dual) citizenship by birth (chapter 1.2) and by naturalization (chapter 1.3).

Chapter two elaborates on the two approaches mainly used in academic literature to study dual citizenship, the traditional top-down approach and the up-and-coming bottom-up approach. The first focusses on the public dimension and is strongly connected to the republican notion of citizenship. This means citizens are expected to comply with the dominant norms and values. In other words, it has an exclusive character, as it leaves little to no room for diversity. The second approach connects the private sphere, including all private relationships (so, not just the state-citizen one) to the public dimension. It is a liberal approach that has an inclusive character. The dimensions and approaches are schematically summarized in the appendix.

The research question focusses on the consequences of dual citizenship for the state of residence, not for the ‘other’ or ‘sending’ state. In chapter 3, the consequences of dual citizenship are analyzed according to the top-down and bottom-up approach. This is done by use of the three main arguments against dual citizenship provided by the academic literature. According to the top-down approach, dual citizens cause issues for the state of residence because of their double loyalty (3.1). Having multiple alliances could cause security issues for states, as states could not be certain to depend on all its citizens in times of war. Furthermore, internal processes, like voting, could be influenced by marching orders. The bottom-up approach does not view double loyalty as an issue. This approach regards loyalty as divisible and disentangles it from citizenship. In addition, in practice, marching orders are not followed because dual citizens identify mostly with the citizenship of the state of residence.

The top-down approach also considers dual citizenship problematic when it comes to having dual rights and obligations (3.2). Citizens could not be able to fulfill those in two states at the same time, especially since active participation is a criterion for a good citizen. The bottom-up approach does not expect citizens to participate to a large extent in the public sphere, as it acknowledges other relationships are sometimes more important than the state-citizen one.

The last argument against dual citizenship, according to the top-down approach, is that it forms a barrier for social integration (3.3), because citizens would not be able to focus completely on the state of residence. Hence, they would not be invested in the public sphere as much as expected from a top-down perspective. Bottom-up research, however, shows that dual citizens start to strengthen their roots and corresponding traditions, practices, etcetera, when they feel that they have to hide or completely abandon these. Thus, the chance for reform or integration diminishes.

In the conclusion, a brief overview is given of the two approaches. It is clear that both approaches come to different conclusions regarding dual citizenship. The top-down approach views it as something that negatively affects the society and the state of residence, whereas the bottom-up approach view dual citizenship as something that could positively contribute to society. The differences are mainly grounded in the fact that the two approaches have different theoretical backgrounds. The bottom-up approach research also refutes claims and assumptions from the top-down approach.

This thesis is an addition to the vast body of literature on the topic of dual citizenship. Traditionally, the arguments against dual citizenship have been discussed from a top-down perspective, and counter-arguments are rarely given much attention or elaboration in top-down studies. In this thesis, both approaches are given equal consideration. Much more could obviously be said about the approaches as well as the concept of citizenship itself. Further research avenues are therefore provided at the end of this thesis.

## Chapter 1 Citizenship: notions and sources

### 1.1 Citizenship

Before discussing several approaches to and notions of (dual) citizenship, it is important to establish what citizenship is. In ancient Greek times, citizenship meant access to self-governance by the demos (Ignatieff, 1995, pp. 55-56). Later on, D'Alembert and Diderot (1876, p. 189), figureheads of the Enlightenment, thought of a *citoyen* as follows: “celui qui est membre d'une société libre de plusieurs familles, qui partage les droits de cette société, et qui jouit de ses franchises” (member of a free society of many families, who shares in the rights of this society and enjoys its immunities). Nowadays, the free society of many families would translate into political community. The basics can be detected: a citizen is a member of a political community, who enjoys and assumes the rights and duties of membership. This basic concept has been extended and enlarged over time. It used to apply only to white men of high social-economic class. Currently, it applies to everyone: women and men of all races and classes of society are included (Walzer, 1989, pp. 211-218).

In academic literature, there is consensus that citizenship contains three main dimensions (Fermin, 2009, pp. 13-14; Cohen, 1999, p. 248; Honohan, 2017, p. 91). All dimensions entail some form of reciprocal relationship between the state and its (individual) citizens. (1) Citizenship contains a legal feature, shaped by rights and duties. The legal dimension is defined by social, political and civil rights. The citizen could count on being protected by the law and on being free to act according to the law. (2) The second dimension contains participation and political agency of a political community. This feature gives citizens a (political) voice and a way to express their opinions, for example through democratic means, like voting or organizing a referendum. Ideally, this dimension is carried out with the common good of the state and its people in mind. (3) The final dimension of citizenship is having a collective identity. This means feeling a certain identification with and

having membership of a community. Being part of a group with similar characteristics or norms and values is the basis for this. Psychologically, people can identify with many groups, based upon gender, ethnicity, age, disability, sexual orientation, language etcetera. Not all of these, however, are *political* communities. The community has to seek self-governance. This is a crucial criterion for a political community. It is important to note, though, that a political community does not always have this legal status of self-governance (Carens, 2000, pp. 167-169). For instance, pro-independence Catalans form a political community. However, at this time they do not have their own independent state.

The three dimensions show the importance of citizenship. Having citizenship means access to opportunities, having a political voice, and enjoying specific legal rights and obligations, like the freedom to enter and exit the home state and to pay taxes. Intangible matters like a sense of identity and belonging are also provided by citizenship (Kochenov, 2011, p. 331; Shachar, 2012, p. 1004).

There is no consensus on the relative importance of each dimension. Furthermore, there are many instances in which the dimensions transition into each other. A group of likeminded citizens (third dimension) is likely to express its concerns and opinions (second dimension) via the legal framework that exists (first dimension). Considering that laws and circumstances are different in every state, being a citizen will never mean exactly the same in different states.

### *The republican notion*

As Faist, Gerdes and Rieple (2004, p. 8) state it, citizenship is “first and foremost, the notion of collective self-determination and democracy, second, the legally guaranteed status of equal political freedom and other rights and, third, membership of a political community.” This is a civic republican way of thinking, because it focusses on (democratic) political principles and



the collective self-determination. The demos, the 'we', is required in order for citizens to feel a sense of belonging, to be able to deliberate and to feel solidarity, thereby being a citizen and not a subject (Cohen, 1999, pp. 246-247; Honohan, 2017, p. 92). In other words, a collective identity and a corresponding political community is necessary in order to have political agency.

Because of the emphasis on the collective identity, the republican notion could manifest itself as quite exclusionary. It is associated with prerequisites for members of the political community and excluding other segments of society, often minorities. Excluded groups are considered not worthy of membership, because of assumed insurmountable differences (Cohen, 1999, pp. 248-249; Walzer, 1989, pp. 212-213). As mentioned in the description of the second dimension, the common good should ideally be kept in mind when engaging in political participation. Presumably, excluded groups will not act according to the common good of the dominating group. Hence, they are not deemed as good citizens.

Most notably, people of color and women have been largely excluded from political communities for a very long time. Furthermore, the republican notion is strongly territorial, as social cohesion and solidarity is sought within one state (Bloemraad, 2004, p. 392; Stolcke, 1997, p. 64). In short, the republican notion limits the scope of citizenship.

### *The liberal notion*

Liberal theorists tend to stress the legal dimension of citizenship the most (Honohan, 2017, p. 91). Citizens are not considered political actors, but legal beings, free to act by law and be protected by the law. This does not (necessarily) entail social-cultural equality among citizens (Pocock, 1995, pp. 36-40; Walzer, 1989, pp. 214-215). The laws provide the necessary framework for a functioning state, it does not provide the framework for common private life of citizens.

Within the law, however, people are completely free to be different and diverse. Citizens' behaviour and views may vary. As long as those do not break the law or harm fellow citizens, they are permitted (Spiro, 1997, p. 1474). The distinction between justice (the law) and good (doing the right thing) could be made, but the good is part of a citizen's private life and therefore out of reach for the government. So, no distinction can be made between good and bad citizens, just between lawful and unlawful citizens (Van Gunsteren, 2009, p. 42, p. 46).

Nowadays, universalism fits with the liberal notion, in contrast to the republican notion, which contains a strong territorial component. The liberal notion does not require or strive to form a certain demos, or one collective identity. This means that this notion is more receptive of the idea that citizens have commitments to and relationships with other groups than just one (national) political community. Reality may well be on this notion's side, as most people will never argue that their relationship to the state is the most important one in their lives. Another characteristic of universalism is that rights are connected to (universal) human rights. So, citizens' rights are territorially unbounded, unlimited and transcend a particular state and singular identity (Kochenov, 2011, p. 329; Cohen, 1999, pp. 249; Walzer, 1989, pp. 216-218). In other words, it is an inclusive notion.

The two notions are in tension. The three dimensions of citizenship are compatible with both notions, they just manifest themselves in different ways (Honohan, 2017, pp. 85-94). Republican theorists claim that the liberal notion lacks strong identification with a particular state and social solidarity that is deemed desirable by them. Hence, it undermines the will for political participation. Their notion is political and egalitarian, but exclusive and particular too. Liberal theorists, however, claim that their notion is universal and inclusive. Their notion is apolitical (because a political community is not necessary) and individualistic. As they do

not express the desire for uniformity and good citizens in the republican way, these characteristics are not seen as problematic (Cohen, 1999, pp. 249-250; Honohan, 2017, p. 88).

## 1.2 Sources of (dual) citizenship: birth

The power to provide citizenship continues to lie in the hands of sovereign states. They are given a lot of autonomy in creating laws defining membership boundaries for their political communities (Spiro, 1997, p. 1417). Around half of the world's states allow their citizens to hold dual citizenship. There are two sources of (dual) citizenship: birth and naturalization. The former is divided by *jus sanguinis* and *jus soli*, both of which will be discussed in this section. Modern state policies are rooted in one of these principles and combinations are widespread.

### *Jus sanguinis*

For the principle of *jus sanguinis*, bloodlines and descent are the determinants: a person is required to be a descendant of someone with a certain citizenship. From birth, children are automatically seen as members of the political community, irrespective of their place of birth. This principle translated into policy when (nation-)states sought their legitimacy in the sovereignty of the national community, supposing the community had a shared 'spirit' or joint enterprise (Safran, 1997, p. 314).

For states that are highly affected by immigration, this principle offers the benefit of sustaining relationships with its citizens and their offspring (Barry, 2006, pp. 28-33). It is important to note that not all children have the same access to citizenship, because the state determines the laws and those vary from state to state. Mostly, gender-discriminatory laws are changed, but there are still states, for example Malaysia, in which citizenship can only be transmitted by the father (Shachar, 2012, pp. 1007-1008).

Germany held onto its *jus sanguinis* policy for a very long time. Only with the acceptance of guest workers' permanent stay during the 1990s, it has been adapted. There were whole generations living in Germany without equal opportunities attached to citizenship. These generations, mostly migrants' children, were born in Germany, spoke German and identified with German culture. However, because they did not have German citizenship, they were deprived of socio-economic opportunities their 'real' German friends had, even though the migrants' children contributed to Germany as well. Since the migrants' children felt like they were not being treated fairly, tension arose in society (Stolcke, 1997, pp. 69-70; Brubaker, 2001, pp. 538-539; Heckmann & Wiest, 2015, p. 199).

This phenomenon is not particular to Germany, and is called the second generation problem. Logically, the *jus sanguinis* policy makes it complicated for outsiders to become citizens, because no one can choose to have a different bloodline. This complication is treated differently in the case of *jus soli*.

### *Jus soli*

*Jus soli's* determinant for citizenship is the place of birth: in order to be eligible for citizenship, a person is required to be born in a certain state. This principle has roots in the times when states were marked by feudal lords or monarchs. The term subject would be a better fit for those days, since the dimensions, and rights and obligations ascribed to contemporary citizenship do not resemble the reciprocal relationship people had with their lord back then. Nevertheless, policy based upon *jus soli* has been existing ever since.

Nowadays, the principle refers to the (political) relationship between a state and its citizens, irrespective of the legal status (or, citizenship) of the parents. This means states using this policy avoid the so-called second generation problem, because migrants' children are

automatically given a fresh start with equal membership when born on the state's soil (Shachar, 2012, p. 1006).

The policy of *jus soli* is mostly used by states in which it is desired that the political community is congruent and coextensive with the state itself. Thus, in addition to the determinant of soil, there is a strong cultural aspect to this policy and principle. The best example of this is France after the French Revolution. Then, the French supposed that everybody born on French soil automatically became a member of the nation, which was in their eyes the same as the political community. They would all share an essential bond and devotion to the French norms and values. These were promoted and protected by the state (Safran, 1997, pp. 315-317). As Ernest Renan (1947, pp. 903-904), when describing this process put it: "One is the common sharing of a rich legacy of memories, and the other is mutual consent, the desire to live together, and the will to continue to emphasize the heritage one has received together." Hence, nationality, the political community and citizenship merges into one (Stolcke, 1997, pp. 65-69).

Another example is the United States of America, a settler society. Settlers did not have a relation with the new territory, but they committed to 'Americanness'. To this day, Americans adhere to democracy, equality and all other values as defined by the Constitution (Safran, 1997, pp. 317-318; Shklar, 1991, pp. 5-10). So, citizenship in America means commitment to shared ideals, not to blood lineage.

According to this principle, in order for outsiders to join the state and become a citizen, it is necessary to identify with its (political) norms and values. In short, this principle is not only rooted in someone's place of birth, but also on cultural aspects and the learnability of norms and values.

### **1.3 Sources of (dual) citizenship: naturalization**

It is stipulated by several international conventions and laws, that each person should have a citizenship, and preferably one only. In addition, many domestic laws discourage dual citizenship as well (Fermin, 2009, p. 19; Koslowski, 2001, pp. 206-207; Spiro, 1997, p. 1432).

The previous described dimensions of citizenship and the second generation problem have already given some insight on the importance of citizenship. Given the importance, it is not surprising people would like to obtain citizenship in the state they reside in for a significant amount of time. Global statistics show that only 3% of the world population gains a new citizenship after birth, by naturalization and international migration. All others hold the same citizenship(s) from cradle to grave. The number, however, is ever growing because of increasing mobility and globalization (Shachar, 2012, p. 1005).

In academic literature, two main functions of naturalization are mentioned widespread. The first is that naturalization functions as a political test and mechanism during which applicants can prove they are worth the membership of the political community and society. Passing the test means one is compatible and a good citizen. This is a one-sided process, because the migrant merely has to show he has made effort and is able to pass created obstacles (for example, a citizenship test). The judgement is made by the state (Goodman, 2012, pp. 659-669). The second function is nation-building. The process intends to unify ties between the members of the political community, the in-group, especially the cultural identity aspects, via integration courses focused on language and social norms and values (Gilbert, 2009, pp. 335-343).

In order to gain another citizenship, one has to undergo a process of acquiring it, with naturalization as final step. Each state is allowed to make its own rules and laws surrounding this process. This brings certain risks of exclusion with it. States are in total control of who they are willing to let enter their state, and are thereby able to exclude people aiming for

citizenship (because one should usually be physically present in the concerned state for applying for citizenship) (Spiro, 1997, p. 1417). Furthermore, by instituting so-called incentive packages, states try to attract targeted groups of people to come to their state. These are normally human- and economic-capital rich groups (Sachar, 2012, p. 1016).

Still, there are generalities to be found among the different processes. Mostly, the rules require people to live in a state for a certain amount of time. Testing of language skills, and knowledge about the political system and history and culture (attitudes and norms and values) of a state also often occur. In addition, one should regularly not have a criminal record (Orgad, 2017, pp. 338-342).

Critics, like Joppke (2007, pp. 14-17) say testing culture is essentially repressive and illiberal. Deciding for others what the right attitudes on personal matters are, could be viewed as violating the values governments say they want to promote (for instance, the freedom of speech and religion). As Carens put it: “The most liberal citizenship test is none”. Furthermore, the exact goal or aim of testing-policies is often not clearly described and the format is arbitrary. Effectiveness, legitimacy and justification are therefore difficult to establish (Carens, 2010, pp. 19-20).

In the Netherlands, the United States and almost every other state, people have to undertake action when they want to acquire a the new citizenship, like an oath of allegiance in which they express consent. The oath forms a social contract between the state and the new citizen (Orgad, 2017, pp. 339-340). These oaths ask of people to commit to certain ideals, principles, norms and values. Sometimes one is also asked to renounce the other state’s government. However, there are cases, like for Moroccans, in which a previous citizenship cannot be get rid of by law. In contrast, there are also states that do not permit a citizen to obtain a second citizenship. In that case the person loses the original citizenship automatically (De Hart, 2012, pp. 283-285, p. 255; Spiro, 2002, pp. 20-22).

## Chapter 2 The top-down and bottom-up approach

### 2.1 The top-down approach

In academic circles, dual citizenship and its consequences for the state of residence are overwhelmingly studied according to a standard, traditional approach. This is the top-down approach, centered around the public sphere. It considers dual citizenship problematic. Traditionally, a civic version of the ‘myth of citizenship’ is followed: constant self-governance, by a people knowing each other and knowing what is best for the political community, is the greatest virtue to be achieved by a state and people (Ignatieff, 1991, p. 58; Rubio-Marín, 2000, pp. 63-64). In this myth, states are culturally and ideologically coherent, have a clearly defined territory and are sovereign. Access to citizenship is obtained by birth and regarded as binary: either you are in or out (Benhabib, 2004, pp. 74-75; Spiro, 2008, pp. 60-63).

The main actor in the top-down approach is the state, and dual citizenship is only considered a problem because of the issues it causes for the state, not for individuals. In the next chapter, the causes for problems will be illustrated. This does not mean individuals do not play any role at all. When it comes to individuals, this approach only deems identity with the state and loyalty to the state as important; an individual is just seen as someone who has rights and obligations towards the state. As mentioned in the previous chapter, an individual is able to feel a collective identity with multiple groups, but family, ethnic and religious groups, social context etcetera are irrelevant for the state-citizen relationship in the public dimension (De Hart, 2005, p. 34).

The top-down approach shows links with the republican notion of citizenship, because of the focus on the collective identity of the demos, which, through the associated commitment to the greater good for the demos, converts to active participation and self-governance. In other words, citizenship is considered to be a public office (Walzer, 1989, p.



214; Orgad, 2017, p. 344; Van Gunsteren, 2009, pp. 43-44). This has consequences for the role citizens are expected to play in society.

The republican top-down approach expects this to be a ‘thick’ role. That means that citizens should take on an active role in the public dimension. So, more is expected from citizens than just following the law (for example paying taxes) and being protected by the law. Citizens should accept and adopt social and cultural norms and values. Via the principle of *jus sanguinis*, this would happen automatically. Through *jus soli* or naturalization this could happen, but much effort would be expected from the migrant. Moreover, active participation in society is preferred (Ignatieff, 1995, p. 54). Active participation can take many forms. For instance, people can be politically active and sign up as a candidate for (local) election, or organize meetings for local communities to discuss local issues. One could even go as far as claiming a good, active citizen is a patriot (Renshon, 2004, pp. 118-120; Shklar, 1991, p. 5).

The exclusive character of the republican notion is visible here. Because participation in the public dimension is largely reserved for citizens, little room is left for ‘others’ to participate. The latter, the out-group, who do not share the same norms and values and do not enjoy the same rights, are therefore not able to participate in the same manner as citizens (Bosniak, 2006, pp.1-2).

It is not the goal of this approach to gain knowledge about dual citizens themselves, since the state is considered as the main actor and starting point (De Hart, 2005, p. 34). In contrast, the individuals and their relations to other groups than the state is exactly the focus and starting point of the bottom-up approach to dual citizenship.

## 2.2 The bottom-up approach

Over the past two decades, the bottom-up approach has gained interest in academic circles. The amount of studies, however, remains small in comparison with the continuously growing large body of traditional literature. This new wave, though, provides a whole other insight on dual citizenship by shining light on the individuals and their (private) relationships to each other, not just the one between the state and a citizen.

The bottom-up approach connects the social context of individuals to the public dimension. This way, the public dimension is not ignored and the private dimension is added. Now, dual citizenship becomes a case not just for governments, but for all citizens (Gustafson, 2002, pp. 477-479).

The bottom-up approach regards relations of all sorts important for analyzing dual citizenship. Therefore, this approach is sometimes also referred to as the relational approach. The groundwork comes from relational feminism, which focusses on the importance of relations between an individual and others in general (Koslowski, 2001, pp. 208-210; Knop, 2001, p. 92).

The 'thin' concept of citizenship is correlative to the bottom-up approach. This concept downplays the importance of the collective identity of citizens acquired through *jus sanguinis*. A new collective identity could be created, via *jus soli* or naturalization, when citizens engage with each other (Miller, 1995, pp. 129-130; Heisler, 2001, p. 225). Thereby, citizens 'produce' their own culture, without any interference of the state (Van Gunsteren, 2009, p. 43). Thus, citizenship tests would not be needed according to this approach. There are several gradations of this 'producing' process, but the most extreme gradation would discard any truth to the republican assumption that citizens of one state should share the same life-style and have the same norms and values, thereby being good citizens (Kymlicka, 2003, p. 273).

Following this reasoning, less is expected from citizens in comparison to the top-down approach; performing a passive role, in which individual rights and freedoms are central aspects, is enough (Fermin, 2009, p. 13). In that way, it shows links to the liberal notion of citizenship. The liberal inclusive character is visible, because there is not just one political community or collective identity that someone has to be a part of, or that is valued more than others. The bottom-up approach considers all groups of citizens important in the public sphere, no matter what collective identity they represent, thereby acknowledging differences in identity from the private dimension in the public dimension (Van Gunsteren, 2009, p. 45).

## **Chapter 3 Three arguments analyzed**

Chapter 1 and 2 have provided a broad framework for analyzing dual citizenship. Academic authors often take a stand in the debate on the question whether dual citizenship is a positive or negative phenomenon. Overall, three main arguments against dual citizenship are discussed in academic studies: dual citizens cannot be fully trusted by the state because of their double loyalty, dual citizens realistically cannot fulfill rights and obligations in two states (and are therefore not good citizens), and dual citizenship forms a barrier for social integration. Together, they encompass all dimensions of citizenship. Throughout the arguments, themes of being connected to a state and identity play a big role.

This chapter discusses the arguments, using the dimensions, notions and approaches from the first two chapters. Each argument is divided into sub-themes. First, the top-down perspective is described, then the bottom-up perspective. In general, the top-down approach considers dual citizenship problematic for the state of residence. In contrast, the bottom-up approach counters a lot of the top-down arguments with empirical evidence, and does not consider dual citizenship problematic.

### **3.1 Double loyalty**

One of the most frequently used arguments against dual citizenship is the one that dual citizens cause trust issues because of their double loyalty. The argument relates to the third dimension of citizenship (collective identity), as described in chapter 1.1. Loyalty means having an attachment to a social group, like the political community. With that comes an obligation to behave according to the laws of that community. The state, in return, owes loyalty to its citizens. This reciprocal relationship is called internal loyalty, and is often referred to as a social bond, treaty or contract. External loyalty stands for the loyalty that is expected from citizens when a state finds itself in an international crisis, for example when it

is threatened by other states. In all cases, loyalty refers to an emotional bond (De Hart, 2012, p. 15; Baron, 2009, pp. 1027-1028).

Based upon both forms of loyalty, social categorization is performed. During this process, the political community, usually the cultural majority, decides who is considered a (good) member of the political community and who is not (Ahmed, 2004, pp. 27-30; Baron, 2009, p. 1033). So, who is in and who is out (or the 'other'). From a top-down perspective, loyalty is regarded as something directly following from the third dimension of citizenship: just by having dual citizenship one is assumed to have double loyalty. No actions are needed to base the assumption of double loyalty on and there is no empirical evidence to prove this assumption is true (De Hart, 2012, p. 253). Furthermore, loyalty is seen as something indivisible. Dual citizenship is therefore considered an oxymoron, because having two citizenships (and thus double loyalty) goes against the logic of the top-down system (Koslowski, 2001, p. 217).

The core of the top-down double loyalty discourse is that a dual citizen is not completely focused on the common good of the political community of the state of residence during his or her (political) decision-making process, because he or she might feel a sense of loyalty to another state. This sense of loyalty could translate into behaviour in the public sphere that is against the common good of the political community of the state of residence. Thus, dual citizenship challenges the state in terms of authority and territory and poses questions regarding the coherence of the demos (Spiro, 1997, pp. 1468-1472; Faist, 2007, p. 10, p. 12).

The bottom-up approach, however, regards loyalty as divisible and sees loyalty towards the political community as equal to loyalty towards other groups, like family or a

church community (Martin, 2003, pp. 11-12). In other words, this approach disentangles citizenship and loyalty. Then, double loyalty is not considered a problem.

### *The security frame*

According to the top-down approach, double loyalty is traditionally viewed as a serious threat regarding external loyalty. In times of interstate conflict, states need to be absolutely certain that they are able to count on their citizens. However, citizens with loyalty to multiple states could choose a preferred state and undermine the command of the other from within (Spiro, 1997, pp. 1014-1015; De Hart, 2012, p. 15). Historically speaking, though, there are not many cases in which citizens with double loyalty have caused actual, not perceived, danger to a state (Aleinikoff & Klusmeyer, 2001, p. 80; Hansen & Weil, 2005, pp. 7-8). Furthermore, the top-down approach does not leave much room for the assumption that dual citizens actually do not always feel loyalty to both states. This could be the case though, especially when they have fled oppressive regimes (De Hart, 2012, p. 254).

The bottom-up approach does not consider dual citizenship problematic for external loyalty. By including other relationships in the discourse, like family relations, it could be argued that the risk of war itself is diminishing: citizens would do as much as possible to prevent conflict with a state they have relationships with. They could do this, for example, by influencing a state's stance on international issues via domestic channels (Barry, 2006, pp. 51-52)

Nowadays, the security frame of the argument is losing significance and becoming implausible, because states, especially democracies, are rarely in conflict anymore. That does not mean it has no value anymore, but there are other, more salient, arguments in the double loyalty discourse (Spiro, 1997, pp. 1461-1462; Martin, 2003, pp. 16-17).

### *Marching orders*

As the security frame is used less often, another argument based upon double loyalty has filled that gap, namely the one of marching orders. Marching orders are given when the other state articulates preferences on (political) matters in the receiving state. The expectation, according to the top-down approach, is that dual citizens follow the preferences of the other state and act accordingly. This means that they are not independent in their decision-making (Spiro, 1997, pp. 1468-1472). So, marching orders threaten the internal loyalty.

Following the other state's preferences does not occur much in reality (Martin, 2003, p. 13), but the real fear is that when it does happen, it happens when states with different norms and values are in play. Therefore, some states see only specific groups of dual citizens as problematic, namely the ones that do not have similar patterns of norms and values (Naujoks, 2009, pp. 1-10). Germany, for example, used to grant dual citizenships easily only to people from states that are members of the European Union, because those were considered to have similar norms and values (Spiro, 2017, p. 638).

The bottom-up approach acknowledges that the collective identity of other groups than the political community are sometimes deemed as more important by (dual) citizens. It sees other relationships as integral parts of someone's identity. The other citizenship should be seen in the same light (Spiro, 1997, pp. 1473-1474), namely as an equal kind of relationship as the family or sports club affiliation (Martin, 2005, p. 39). Then, dual citizenship does not do any harm.

One citizenship is not automatically considered as more important than the other by people who have two. In fact, empirical bottom-up research shows that citizens with dual citizenship often identify most with their new citizenship, or the one from the residing state. Especially after naturalization, the new citizenship is seen as a recognition and a reflection of someone's (new) identification (Knop, 2001, p. 112). However, the oath taken as part of

naturalization does not mean the other citizenship does not hold any meaning anymore, and it does not prevent the citizen from being politically active in the other state or to act according to the other state's interest (Martin, 2005, p. 40; Schuck, 2005, pp. 88-89). According to the bottom-up approach, though, this does not matter, as loyalty is divisible.

### **3.2 Rights and obligations**

The second main argument against dual citizenship is the one of rights and obligations, which connects to the first dimension of citizenship (legal dimension), as mentioned in chapter 1.1. Dual citizens have rights and obligations in two states. The thought is that this will have negative consequences for the way rights and obligations are fulfilled in the state of residence. Dual citizenship allows citizens to behave in a calculating and flexible way, shopping for rights and obligations that suit them best, trying to dodge the ones that do not benefit them (Gustafson, 2002, p. 474).

#### *Rights*

The possession of rights in multiple states contradicts the principle of equal democratic citizenship (Faist, 2007, p. 10). A regularly used example of this is the principle of one man, one vote: by having voting rights in two countries, one man has multiple votes. The binary and exclusive character of citizenship the top-down approach uses is violated when this happens, because citizens may be somewhat in and somewhat out with two states, but neither completely in or out with either of them.

In reality, bottom-up research has shown that most citizens with dual citizenship are not politically active in the other state and make no use of their voting rights there. Dual citizens, by birth, that have never resided in the other state for a significant amount of time, do often not take part in the political community of the other state, because they have no ties to



that community. The existing ties are part of the private dimension and regard family, traditions and friends (De Hart, 2012, p. 263). So, they indeed feel like they are connected to two states. These relationships, though, do not reflect on the state level of the other state. Therefore, they do not have spillover effects on the participation in the public dimension of the state of residence. In this light, the example of the Turkish referendum and the large amount of Turkish-Dutch voters as mentioned in the introduction is an exception rather than the rule.

Dual citizens, by way of naturalization, also acknowledge that they have ties to the other state. When, or rather if, they do participate in the political community through voting, several perspectives are considered by them during their decision-making process. These perspectives include their lives and position in their new society as well as the political and socio-economic climate in the other state. The citizenship acquired through naturalization, however, is often regarded as most important. It is the citizenship they chose to acquire for a reason after all. This means that their vote is a well-thought-out decision and could also positively influence the sending state in cases when citizens vote based upon the democratic principles of the receiving state (Rubio Marín, 2006, p. 144; De Hart, 2012, p. 16).

The top-down approach claims there is an exit-option available for dual citizens. The exit-option entails that citizens do not have to live with the consequences of their vote. They have the ability to migrate to another state and enjoy full rights over there. The negative component of this ability, from a top-down approach view, is that citizens might not take the civic responsibility of voting as seriously as they should. In contrast to the danger the top-down approach proclaims regarding the exit-option, bottom-up research shows that citizens hardly ever emigrate based upon election results and their consequences (Martin, 2003, p. 12).

On the other side of the rights issue are the rights that states owe to citizens. Among them is the right to be protected by the law. According to the top-down approach, it is the state-citizen relationship that counts. Dual citizens are bound to laws of two states and this could be exploited by using the laws (of protection, for instance) of one state against the other in cases of conflicting laws. Naturally, a state would protect a genuine member of the political community, but dual citizenship becomes a problem for the state of residence when someone does not act like a good citizen. In other words, when one does not participate in the public sphere, not making any contributions and showing no attachment, thereby not fulfilling the obligations towards the state. In that case, it can be argued that such a person is posing a threat to the political community, and so to the state, because absence of participation diminishes the connection between the state and its citizens. Theoretically, it would be against a state's interests to engage in a dispute with another state when the member in question is not even a good citizen (Spiro, 1997, p. 1432, p. 1467; Schuck, 2005, pp. 77-78).

The liberal bottom-up approach analyses dual citizenship through universalism. This means that citizens, according to international law, should always be protected against wrongdoings, no matter the political attitude of the citizen (Martin, 2003, p. 15). In addition, the behaviour of citizens is seen in a different light than the top-down approach does. The bottom-up approach uses the concept of thin citizenship. So, the emphasis on the costs of having to save someone that is not even a good citizen becomes otiose, because the whole concept of good citizen is not relevant in the bottom-up approach, as discussed in chapter 2.2.

Furthermore, having the security and certainty that come with in the state of residence is a huge part of feeling connected to that state and wanting to participate in the public sphere in a positive way, as they now also have the greater common good for the political community in mind (Carens, 2005, pp. 109-110; Rubio-Marín, 2006, p. 143). The risk of dual citizens being troublemakers is therefore diminished (Fortier, 2010, pp. 27-28; Faist, 2007, p.

10; Bloemraad, 2004, p. 393). So, in this sense dual citizenship actually has a positive impact on the state of residence.

### *Obligations*

It seems practically impossible to fully fulfill obligations in two political communities (Spiro, 1997, p. 1478). One of the most difficult obligations to fulfill in two states is obligatory military service. Not only does this obligation touch on the double loyalty issue, it also provides practical difficulties. No one can be in two places at once, so fulfilling obligations in one state while being away fulfilling military service for the other state is impossible. The top-down approach sees this as a problem, as a good citizen should carry out the active, thick concept of citizenship (see chapter 2.1).

Bottom-up research shows that citizens that are in the position to be obliged to fulfill military service are usually given the chance to buy off the military service or make other arrangements that favor the state of residence (Martin, 2003, pp. 16-17). Also, when they actually have to go on military service in the other state, they mostly do so not happily and willingly (De Hart, 2012, pp. 187-188). Following the thin concept of citizenship, being away on military service should not have major repercussions for either state, as paying taxes and even voting is still possible.

### **3.3 Barrier for integration**

The third main argument against dual citizenship is that it forms a barrier for social integration. This argument connects to the second dimension of citizenship (participation and political agency), as mentioned in chapter 1.1.

The core of the argument is that dual citizens have such close ties to the other state, that social integration in the state of residence is obstructed. Dual citizens are not completely

committed to one political community, and thus not able to fully focus on integrating in their new state (Fermin, 2009, p. 20; Heisler, 2001, p. 228; De Hart, 2012, p. 17).

### *Thick versus thin*

The top-down approach assumes that dual citizens have ties to two states. That assumption is based upon the fact that this approach links citizenship strongly to the collective identity of the political community. It is therefore very hard to imagine that someone with dual citizenship does not feel connected to the other political community. If those ties have been there internally for a longer time, they will likely be stronger than the new ones (Gustafson, 2002, p. 475). Hence, accepting dual citizenship is sometimes referred to by republican theorists as the devaluation of citizenship (Gustafson, 2002, p. 472, p. 478; Spiro, 1997, p. 1473). However, as was the case in 3.1, there is no empirical evidence to prove the assumption (De Hart, 2005, p. 40). Still, it is frequently used in academic literature.

From a top-down perspective, a dual citizen should do as much as possible to become a full member of the political community in the state of residence. The burden of proof, so to speak, is on the citizen. It is felt by many top-down theorists that migrants have left their state voluntarily. By doing so, they have voluntarily relinquished some rights that go along with that citizenship. As they begin new lives in a new society, they have obliged themselves to integrate in the new political community (Weinstock, 2017, p. 278). The process of naturalization, including the citizenship test and oath, could be seen as a reward and/or a step in the direction of further integration (Faist, 2007, pp. 37-38).

The bottom-up approach, using the thin concept of citizenship, requires less adaptation from new citizens. As long as they fulfill the passive role of citizenship, their private lives can be lived in whatever way they want to (Van Gunsteren, 2009, p. 45; Weinstock, 2017, p. 269).

Hence, social integration is not something that has to be administered top-down, because all relationships are seen as equal.

When an active role is ascribed to citizenship, as the republican thick concept does, there are a lot of actions expected from (new) citizens. Dual citizens have to adapt more than when the thin concept is used, while social categorization (and thus exclusion) is based upon, among other, these concepts. The risk of exclusion from the political community is thus greater when the top-down approach is used than when the bottom-up approach is used (Hansen & Weil, 2005, p. 10).

As mentioned in the previous two paragraphs, the bottom-up approach does not regard ties to the other state as something bad. In fact, dual citizenship could be regarded as the official, legal acknowledgement of the dual bonds and a signal that they do not have to hide their roots (Gustafson, 2002, p. 466; Van Gunsteren, 2009, p. 45; Weinstock, 2017, p. 279).

### *The second generation problem*

As earlier referred to in chapter 1.2, the second generation problem is solved when jus soli policy is used, because migrants' children receive citizenship. With citizenship come full political and socio-economic rights. However, there is a cultural side to this problem as well (De Hart, 2012, p. 257-259). Even though dual citizens have all rights by birth, they could still be perceived as belonging to the out-group (Gustafson, 2002, p. 471). In that case, they are facing the same problems that naturalized citizens are facing, because both groups are considered as out-group and are expected, from a top-down view, to become like the cultural majority.

The exclusion could lead to something that Shachar (2001, pp. 35-37) has called reactive culturalism. This means that dual citizens start to strengthen their roots and

corresponding traditions, practices, etcetera, when they feel that they have to hide or completely abandon these. Hence, the chance for reform or integration diminishes.

Since this is a cultural problem and not one of rights, it is very difficult to come up with a quick solution. Each state designs its own integration policy differently and outcomes differ from policy to policy. It depends on which approach is used when social integration is deemed successful (Faist, 2007, pp. 32-33; Gustafson, 2002, p. 466).

Either way, the real acceptance of dual citizenship should inevitably come from society itself, because it (usually) is the cultural majority that decides who is seen as a member of the political community and who belongs to the out-group. Society could be influenced via top-down initiatives from the government (Weinstock, 2017, pp. 279-280). However, this seems to be difficult to achieve in societies nowadays. The cause for this could be growing emphasis and attention for the republican homogenous notion of the political community (Heisler, 2001, pp. 227-229).

## Conclusion and recommendations

The research question for this thesis is whether the top-down and the bottom-up approach come to the same conclusion regarding the consequences of dual citizenship for the state of residence. It is clear that this question can be answered with an absolute no. There are several ways to explain this answer. One is theoretical, the other practical.

The top-down and bottom-up approach have different theoretical backgrounds. The top-down approach is republican. It focusses on the collective identity dimension of citizenship and argues that a society should be socially cohesive. In such a culturally homogeneous society, the political community would ideally be formed by good citizens only. A good citizen is someone who acts according to the common good of the society and takes on a thick, active and participatory role in the public sphere. Citizenship should be regarded as a public office. Furthermore, there is a territorial aspect, as this sort of society is sought after within one state.

Following this reasoning, the top-down approach makes a clear distinction between the in-group (good citizens) and the out-group (the others). This distinction is the outcome of social categorization, a process during which (usually) the cultural majority decides who belongs to which group. The only relationship this decision is based upon is the state-citizen one, in which the central actor is the state; dual citizenship is seen as problematic, because it causes problems for the state, not for individual citizens. The distinction between the in- and out-group makes this approach quite exclusionary, because the public dimension in which the citizens are expected to play their thick role, is reserved for the in-group.

In contrast, the bottom-up approach is theoretically rooted in liberalism, relational feminism and universalism. This approach also seeks equality, but in the sense that everyone is equal before the law. So, it stresses the legal dimension the most. Laws are state specific,

but the bottom-up approach sees citizens' rights from a universal human rights perspective. This approach, therefore, transcends (nation-)states and lacks a strong territorial component.

Society itself could be diverse and all relationships and collective identities are seen as equally important. Thus, the state-citizen one is not more important than, for instance, family relations or church communities. This approach does not use the concept of good citizenship, because (doing) 'good' is part of someone's private life. All that counts is whether or not a citizen is just (acts according to laws). As the political community is just one of the many collective identities of someone's life, another role is expected from citizens. A thinner, passive role is sufficient. This gives the bottom-up approach an inclusive character, because the more diversity is allowed in the in-group, the more people can be part of it.

Dual citizenship has traditionally been studied along top-down lines. This research has limitations, mainly because of the limited scope by focusing primarily on states and the public dimension. Private relationships are deemed irrelevant and are largely ignored in scholarship. With the emergence of bottom-up research, however, it has become possible to (empirically) test the claims and assumptions of the top-down approach. Because the bottom-up approach focusses on individuals as well as states, it has been a great way to empirically test the claims made by the top-down approach. The empirical outcomes of this kind of research suggest that the expected consequences of the top-down approach do not always correspond with reality. This is true for all three arguments. In addition, the normative aspect of the theory also loses its traditional prerogative status, since the bottom-up approach is able to provide an alternative for the ideal image of citizenship and citizen behaviour to the top-down approach.

Because of the limited space of the thesis, no case studies have been conducted. More bottom-up case studies could contribute to the debate on the consequences of dual citizenship,



because only then sentiments in these segments of society could really be tested. Such research could also provide more insights into the causal relationship between citizenship and cultural norms and values. If this relationship is not proven to be causal, dual citizenship might lose significance for the top-down approach and will be seen as less problematic.

The bottom-up approach gives way to a globalist view of citizenship. The collective identity aspect, for example, in light of this debate acquires an entirely new meaning when the territorial component is taken out. Recently, debates have been focusing on the possibility of post-nationalism and denationalized citizenship (Bosniak, 2000). According to the proponents of these concepts, dual citizenship does not mean anything in itself, because people are global citizens. There are obstacles, however, since this concept is largely based upon western norms and values. Denationalized citizenship might be a possibility for unions like the European one, but it would not solve the question of conflicting cultural systems of norms and values. Nationalistic sentiments remain to be very strong indicators of social categorization (Spiro, 1997, pp. 1478-1479). Empirical studies also show that the reality is, that dual or even plural citizenship will more likely to become the norm, since people would like to maintain the citizenship of their home country. This relates to the collective identity dimension of citizenship (Bloemraad, 2004).

In order to study (dual) citizenship more broadly, all dimensions, notions and approaches have to be taken into account. It is clear, however, that the concept of citizenship at any rate is still important and very relevant for citizens as well as states. Thus, in a world where the importance of ascribed status is increasingly diminishing, citizenship remains one of the striking exceptions.

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# Appendix

## 1 Dimensions of citizenship

Legal	Participation & political agency	Collective identity
<ul style="list-style-type: none"><li>• Social, political and civil rights &amp; obligations</li><li>• State specific laws &amp; human rights</li></ul>	<ul style="list-style-type: none"><li>• Expression of citizenship:<ul style="list-style-type: none"><li>• Thick role</li><li>• Thin role</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Membership of (political) community</li><li>• Psychological relationships based on similar characteristics or norms and values:<ul style="list-style-type: none"><li>• State - citizen</li><li>• Family</li><li>• Church</li><li>• Sports club</li><li>• Gender</li><li>• Ethnicity</li><li>• Etc.</li></ul></li></ul>

2 The approaches

