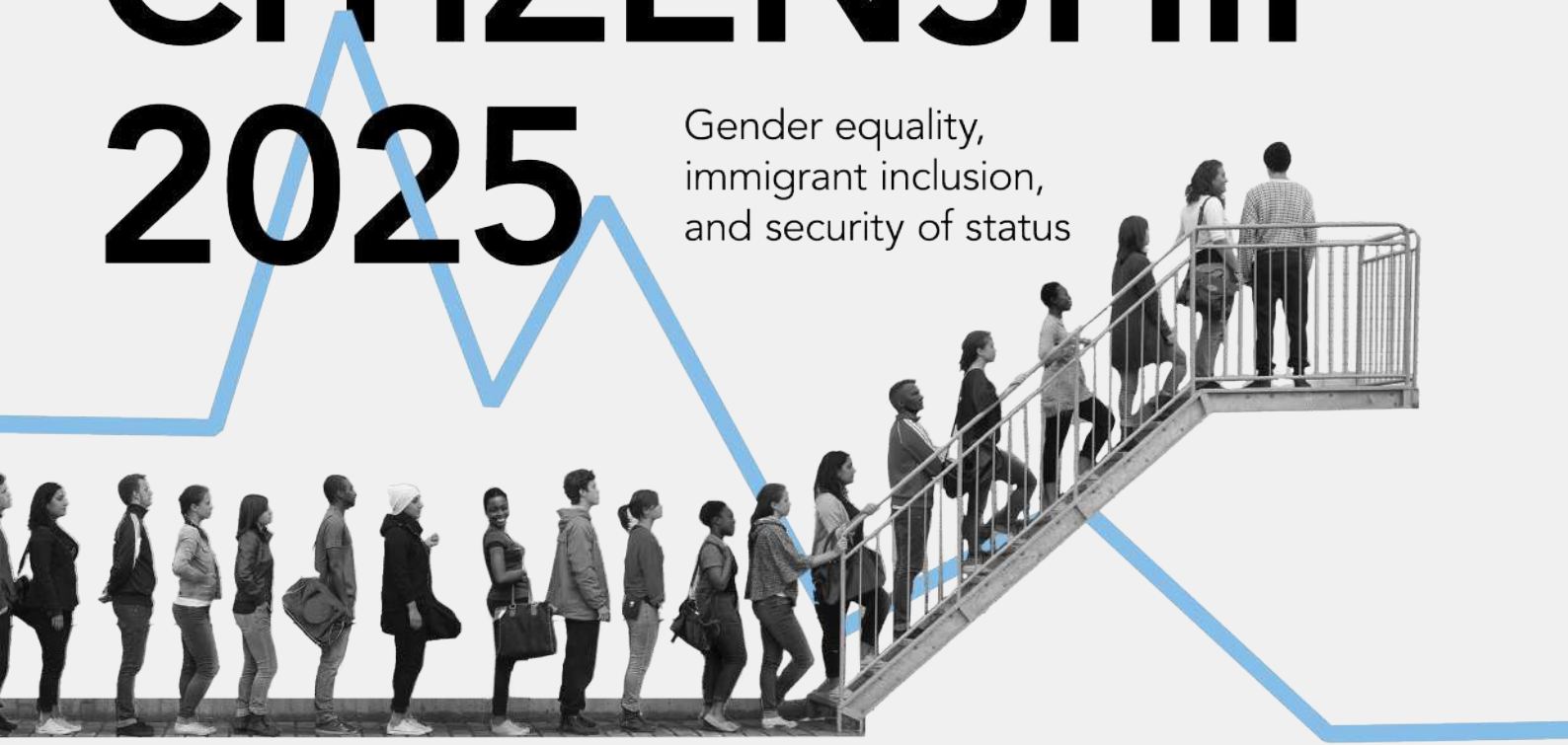


# THE GLOBAL STATE OF CITIZENSHIP 2025

Gender equality,  
immigrant inclusion,  
and security of status



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Maarten Vink, Jelena Džankić, Thomas Huddleston,  
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## A word from the authors

We are pleased to present the first edition of the Global State of Citizenship report, published by the Global Citizenship Observatory (GLOBALCIT).

This report accompanies the launch of an updated version, v3, of the GLOBALCIT Citizenship Law Dataset. The Dataset includes information on the citizenship laws in 191 countries in the period 2020 to 2024 and longitudinal data on global dual citizenship acceptance since 1960. After introducing the ‘big picture’ of the variety of birthright citizenship regulations around the world and the main other ways to acquire and lose citizenship, the report highlights three themes: gender equality, immigrant inclusion, and security of status. While we strongly believe these are key issues that should concern policymakers, media, activists, and scholars, there are many other topics that appear on our radar at GLOBALCIT’s debate forum, book reviews, news section, blog series, and new citizenship literature alerts. These include the weaponisation of citizenship (including forced naturalisations), investor citizenship programmes, and reparative citizenship provisions, to name but a few. We plan to zoom in on such topics in future iterations of the Global State of Citizenship report.

This 2025 report would not have been possible without the invaluable contributions of all the over 250 country and regional experts of GLOBALCIT who have generously shared their knowledge on the history and current situation of citizenship laws around the world. We thank Rainer Bauböck for constructive feedback on a draft version of the report and Jadé Botha for final editing.

As authors, we hope that this report helps to better understand the variety in ways citizenship is regulated around the world and, importantly, why regulating the acquisition and loss of citizenship status truly matters for the lives of people around the world.

*Maarten Vink, Jelena Džankić, Thomas Huddleston, Ashley Mantha-Hollands, Luuk van der Baaren*

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### About the Global Citizenship Observatory (GLOBALCIT)

GLOBALCIT is a global research network committed to fact-based and non-partisan analysis of citizenship laws and electoral rights around the world. We are based at the European University Institute as part of the Global Governance Programme at the Robert Schuman Centre. The four Co-Directors of GLOBALCIT are Rainer Bauböck, Jelena Džankić, Jo Shaw and Maarten Vink.

GLOBALCIT publishes [databases](#), [analyses](#), [indicators](#) and [debates](#) on citizenship status and electoral rights. It relies on a [large international network of country experts](#) who write country reports, collect legal documents, and, together with our [regional coordinators](#), provide input for our comparative databases. Its user-friendly interactive tools enable the comparison of data across countries and over time.

GLOBALCIT is supported by the [Global Governance Programme](#) at the European University Institute, as well as by a research grant from the [British Academy](#). GLOBALCIT continuously explores partnerships with international organisations and research institutes that contribute to our goal of promoting research on citizenship around the globe.

## Executive summary

No matter where or to whom we are born, we all have the right to be recognised as a citizen of at least one state in the world. This is what is meant by Article 15 of the Universal Declaration of Human Rights, which states that ‘everyone has the right to a nationality’. Even so, we live in a world where over four million people are stateless, because their citizenship remains denied or unrecognised. Living up to the promise of eradicating statelessness is challenging because each state decides on how its citizenship can be acquired and lost. In this report, we map the variety of ways in which states regulate citizenship. In so doing, we identify the obstacles that individuals face in being recognised as citizens that arise from different and uncoordinated approaches of states around the world.

Most people acquire citizenship on the basis of birth; this is the so-called birthright citizenship. People obtain birthright citizenship either by having one or both parents who are already citizens of a country, or by being born on the country’s territory. For states, these are not mutually exclusive ways to grant birthright citizenship; in fact, most states around the world use both. For instance, if a country grants citizenship based on birth on its territory, it may still grant citizenship to children of its citizens born abroad. Equally, a country that grants citizenship to children of its nationals may recognise nationality to foundlings or children who would otherwise remain stateless.

While some people are struggling to be recognised as citizens, others may have the right to more than one nationality. Having more than one nationality is often due to a family history of migration, marriage, cultural belonging, or talent. Historically, dual or multiple citizenship was not accepted because it raised concerns over loyalty. Over the last decades, the acceptance of dual citizenship has been on the rise. For instance, in 1960, only six percent of the world’s countries accepted dual citizenship. By 2024, this increased to 51%.

## Gender equality

Everyone should have equal access to citizenship, regardless of their sex, gender, or sexual orientation. Equal access should be an undisputed norm. However, citizenship laws around the world reveal that discrimination on these grounds persists, either directly or indirectly.

Direct discrimination in citizenship law takes place when a person is unable to acquire or transmit citizenship on the

basis of their sex, gender, or sexual orientation. Examples of direct discrimination in citizenship laws are when only fathers (and not mothers) can pass their nationality to their children, when only men can transfer their citizenship to their female spouses, and where heterosexual couples can transfer citizenship to their partners while same-sex couples cannot. Such overt discrimination is on the decline because of the growth of international human rights norms on sex/gender equality. Even so, new forms of discrimination are evolving in the context of the increasing accessibility to alternative reproductive technologies and the growth of diverse families.

## Immigrant inclusion

Most immigrants can only obtain the citizenship of their new country by applying to be recognised as citizens after living in the country for a certain amount of time. Such ‘ordinary naturalisation’ comes with the challenge of recognising the effective ties and interests that bind immigrants to their new adopted home. The kinds of links you are required to prove as a prospective citizen differs greatly between countries. In some countries, these requirements, such as ‘good character’, are based on what most citizens of a country have in common. In others, naturalisation requirements such as income and integration, indicate that in their quest for the ‘perfect citizen’, states expect more of immigrants than what they expect of their own citizens.

Citizenship laws not only shape immigrants’ opportunity to become citizens of their new country; they also shape public attitudes and immigrants’ wider socio-economic opportunities and sense of belonging. The legal requirements for ordinary naturalisation are most inclusive in traditional migrant destination countries in the Americas and Western Europe. They are uneven in Africa and South and Southeast Asia, and most restrictive in Central and Eastern Europe, East Asia, the Middle East and Oceania.

Worldwide, the most common ordinary naturalisation requirements are five to seven years of legal residence, a good character or no criminal background, and a basic level of language knowledge. Less common requirements include economic self-sufficiency, civic or cultural integration or assimilation, specific language or citizenship tests, and renunciation of any foreign citizenship. Adopting a more restrictive approach to naturalisation is directly reflected in how many immigrants succeed in becoming citizens.

## Security of status

Citizenship is often described as a secure status: once a citizen, always a citizen. This security of status comes with a guarantee that a person can always come back to their country of origin. In most cases, being a citizen prevents the state from expelling a person or extraditing them to another country.

Yet in recent years, the status of citizenship has become ever less secure. With the growing number of armed conflicts and incidence of terrorism worldwide, many countries have introduced provisions for withdrawing the citizenship of a person on the basis of national security grounds. Over a third of the world's countries, including many European states, can now strip a person of their citizenship when their actions are seen as disloyal or threatening to state security.

Most of the provisions for stripping citizenship target persons who have naturalised, and not those who have been born as citizens. This indicates that – for most immigrants – the status of citizenship is not truly secure. Imagine two people – one born a citizen, one naturalised - committing the same act of treason against their state. While the 'natural' born citizen would be able to retain their citizenship, the naturalised one would lose it. This is discriminatory treatment. A further issue with citizenship revocation is the widespread absence of proper legal safeguards and protections against statelessness. People who gave up their citizenship of origin to be naturalised or people who the state considers to belong elsewhere are at a particular risk.

## The GLOBALCIT Citizenship Law Dataset, version v3

### What's in the dataset?

The GLOBALCIT Citizenship Law Dataset provides systematic information on the ways in which citizenship can be acquired and lost in 191 countries around the world. We define citizenship as a legal status and relation between an individual and a state or other territorial polity (such as the European Union, a federal province, or only partially recognised states) that entails specific legal rights and duties (see our online [Glossary](#) for more definitions of key terms you will encounter in this report). The Dataset is organised around a comprehensive typology of the many ways in which citizenship can be acquired and lost. This information facilitates comparisons of the rules applicable to similar groups across countries and provides a global outlook on the current state of citizenship law.

### What's new?

The updated version v3.0 of the Dataset covers the citizenship legislation in force on 1 January of the years 2020 to 2024 in 191 states, as well as dual citizenship regulation in 200 states from 1960 to 2024. This version includes corrections of coding for those years covered by previous iterations of the Dataset, drawing on feedback from experts, new information or revised insights into the most appropriate interpretation of specific legal provisions. All updates and corrections are listed in the updated Codebook.

### Where to find the data

The updated version v3 of the Dataset and the Codebook, as well as all previous versions, are available in Cadmus, the European University Institute Research Repository: <https://cadmus.eui.eu/handle/1814/73190>.

### Exploring the data

The data can be explored through two online databases on [modes of acquisition of citizenship](#) and [modes of loss of citizenship](#). The databases provide information on the relevant article in the law for a provision, the procedure of acquisition or loss, as well as a summary description of the provision ('Conditions') and a standardised categorisation of the type of provision that allows comparing similar types of provisions across countries ('Category').

These databases allow two types of searches: a) list all modes of acquisition or loss of citizenship in one country (select the country you are interested in); b) compare a mode of acquisition or loss of citizenship across countries (select the mode of acquisition/loss of citizenship you are interested in and compare across all or selected countries)

### How to cite the dataset

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1.

# Citizenship around the World in 2024

Thematic lead: Maarten Vink

Everyone has a right to a nationality, states the [Universal Declaration of Human Rights](#). This means that every person should be recognised as a citizen by at least one country, and that no one should be stateless. This norm is firmly embedded in international law and reflected in [UN Conventions](#) aimed at preventing, or at least [reducing](#), the occurrence of statelessness. At the same time, guaranteeing the universal right to citizenship is complicated by the fact that, in the current international order, each sovereign state has the prerogative to regulate how its citizenship can be acquired and lost. Precisely because states can autonomously decide who their citizens are, historically, there has been a great variation in the ways in which states do so.

As a result, whether or not a newborn child will be a citizen of their country of birth depends on the law in place in that country. Whether a child will acquire the citizenship of one or both of the parents (and how ‘parent’ is defined, as we discuss below in section 2) depends on the laws in place in their parents’ countries of citizenship. There are significant differences between countries in terms of how long a person has to wait as an immigrant until they can apply to become a citizen and what other conditions they need to fulfil (see section 3). Finally, how secure citizenship is depends on whether and how easily governments can deprive citizens of that status (see section 4).

For most people, the country of which they are a citizen is determined at birth. Since [life chances are greatly determined by the economic, social and political development of the country of which one is a citizen](#), this [birthright lottery](#) is hugely impactful. For that reason, we start this report by mapping the main ‘birthright’ principles that countries apply to determine who is a citizen. The lack of international coordination in how people can acquire citizenship means

that some people become citizens of two (or even more) countries at birth, for example, if their parents are from different countries, while others end up not being recognised as citizens by any country. Whereas statelessness continues to be viewed as an anomaly, multiple citizenship is increasingly accepted as a fact of life in a migratory world where exclusive allegiance to a single country has become outdated. In this first section of the report, we map the main patterns in regulating birthright citizenship, in other ways to acquire and lose citizenship, as well as in the slow but steady trend of increasing dual citizenship acceptance.

## Birthright citizenship

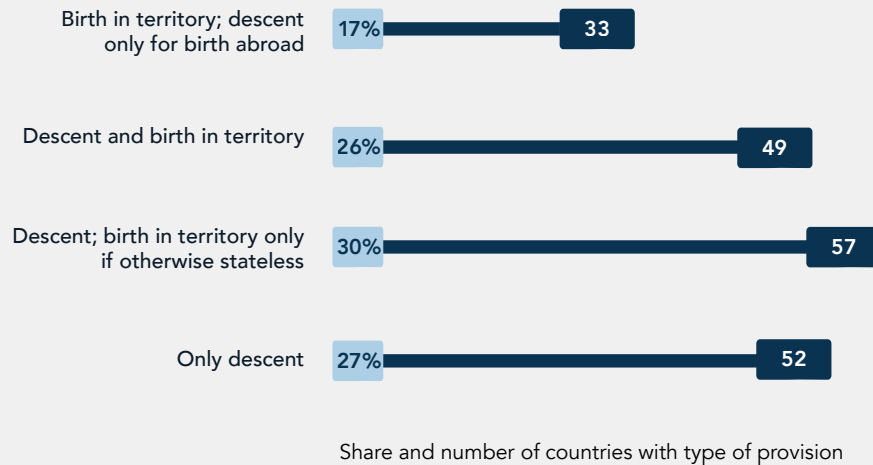
[Birthright citizenship](#) refers to the legal status of citizenship acquired through birth. A newborn child can acquire the citizenship of a country through birth in two different ways: by birth to a citizen parent (often referred to as *ius sanguinis*, or the right of blood) or by birth in the territory of a state (*ius soli*, or the right of soil). While these principles are often seen as mutually exclusive, most countries combine the two.

## Acquiring citizenship at birth by descent

As Figure 1.1 indicates, only a minority of countries covered by the dataset exclusively apply a descent principle for the acquisition of citizenship at birth. In 27% of countries, a child only acquires the citizenship of that country if one of their parents is a citizen. This is the case even if the child is born in the territory of the country and would otherwise be stateless. The citizenship laws in many of these countries do provide for the citizenship acquisition of [foundlings](#) (children of unknown parentage found in the country’s territory).

## 1.1 BIRTHRIGHT CITIZENSHIP AROUND THE WORLD: THE BIG PICTURE

Type of birthright citizenship principle (excl provisions for foundlings) | 191 countries | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3, mode: A01a, A01b, A02, A03b

What if a child is born abroad? All 191 countries included in our dataset apply descent-based birthright citizenship acquisition to children born abroad to a citizen parent. Whether a citizen can transmit their citizenship to their child born abroad, however, depends on additional criteria in just under half of the countries.

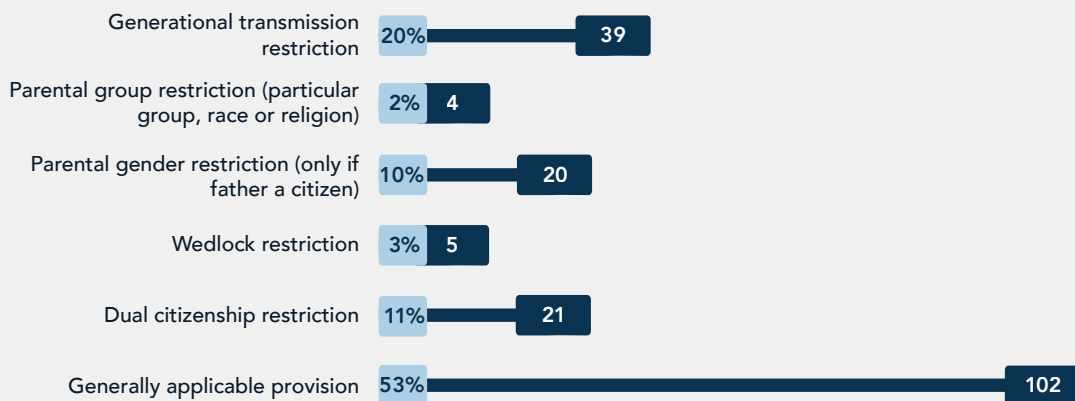
The most common restriction on transmitting citizenship to children born abroad applies to those whose citizen parents were also born abroad. In one-fifth of countries, parents born abroad cannot pass down their citizenship if their child is also born abroad, or they can only do so after residing for a certain period in their country of citizenship prior to the birth of the child. For example, in Australia, two years' residence is required. In other countries, children whose parents were also born abroad can become citizens through descent as long as their grandparents were born in the country (the second generation born abroad). This is the case in Peru, where those children born abroad whose parents and grandparents were also born abroad (the third generation born abroad) can become citizens only by living in Peru and making a declaration upon reaching the age of majority. When citizenship acquisition is not automatic at birth, other criteria may also vary. For example, in the United Kingdom, a child born outside the UK automatically acquires British citizenship if the citizen parent was born in the UK. If the parent was also born abroad (and their parent was born in the UK) but has resided in the UK for three years while the child is a minor, the child is entitled to register as a British citizen. If the child is over 10 years old, a 'good character'

requirement applies. This can be a significant obstacle to becoming a citizen, compared to those who have an automatic birthright to citizenship.

A few countries further restrict citizenship abroad to cases where children are born to two citizen parents. This dual restriction applies in 21 countries, such as Bhutan or Croatia. In countries such as Uzbekistan or Vietnam, citizenship can only be passed down the generational line if the parents are citizens or stateless. In 20 countries, citizenship can only be transmitted abroad if the father is a citizen. We discuss these discriminatory provisions in section 3 of this report. In Cameroon, a child only receives citizenship if the parents are legally married. In four other countries, only the mother can transmit her citizenship if the child is born out of wedlock. Finally, citizenship transmission laws may discriminate against citizen parents on other grounds, such as the parents' race or religion (2%). Sometimes people face multiple restrictions. For instance, a Brunei citizen father can only pass down his citizenship to a child born abroad if he was himself born in Brunei (or was born abroad to a father born in Brunei) and belongs to one of the specified indigenous groups of the Malay race. Uganda applies a list of ethnic groups to which the citizen parent or grandparent must belong. In [Sierra Leone](#), the citizen parent needs to be 'of negro African descent' and in [Liberia](#) must be a 'Negro or of Negro descent'.

## 1.2 TRANSMITTING CITIZENSHIP TO A CHILD BORN ABROAD

Type of restriction in place to acquire citizenship by descent | 191 countries | 2024



Share and number of countries with type of provision

Source: GLOBALCIT Citizenship Law Dataset, v3 | mode: A01b

## Acquiring citizenship via birth in a country's territory

Is citizenship transmitted both through descent and through birthplace? Territorial birthright citizenship, meaning birth in the territory of a state as grounds for citizenship at birth, exists in 82 out of 191 countries (43%). In 38 countries, mostly in the Americas, citizenship is acquired automatically and unconditionally upon birth in the country (Figure 1.3). Only the children of diplomats are typically excluded from such provisions, as they are not 'subject to the jurisdiction' of that country (a clause that gave rise to a widely criticised attempt to restrict the scope of territorial birthright citizenship in the US under the 14<sup>th</sup> Amendment, via an Executive Order).

## DID YOU KNOW?

## Why the US has territorial birthright citizenship

While some think that the US is the only country with birthright citizenship, unconditional territorial birthright citizenship is common throughout North and South America. For the US and Canada, this is inherited from English common law going back to the famous Calvin's case of 1608. Calvin's Case is 'the earliest, most influential theoretical articulation by an English court of what came to be the common-law rule that a person's status was vested at birth and based upon place of birth'. In most of South America, the legacy of *ius soli* goes back to the Spanish 1812 Cádiz Constitution.

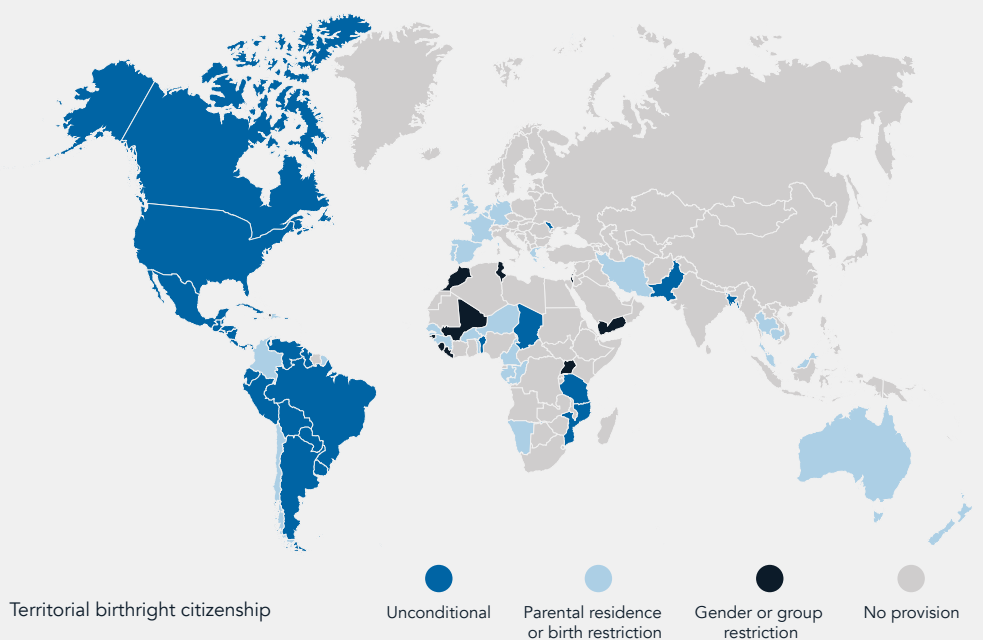
Throughout the Americas, territorial birthright served a useful purpose because former colonial territories needed to break immigrants' links with their

home nations in order to strengthen their own statehood. However, universal birthright citizenship was not established in the US until after the Civil War. In the infamous Dred Scott case of 1857, the Supreme Court ruled that no Black person could ever be a US citizen. It took the Fourteenth Amendment of 1868 to establish that '[a]ll persons born or naturalised in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside.' Among his first actions as reinstated president, Donald Trump issued a 20 January 2025 executive order purporting to roll back territorial birthright citizenship in the United States. Most citizenship scholars view this as unconstitutional.

See also this Vox.com explainer video about why the US has birthright citizenship.

### 1.3 TERRITORIAL BIRTHRIGHT CITIZENSHIP AROUND THE WORLD

Type of territorial birthright citizenship principle (excl provisions for foundlings and those who would otherwise be stateless) | 191 countries | 2024



In 33 countries, whether or not a child born in the country becomes a citizen will depend on additional requirements. A child born to foreign parents may become a citizen if their parent is born in the territory or fulfils a certain residence requirement. For example, a child born in Germany is automatically a German citizen if one of the parents has legal residence there for five years before the child's birth. For countries that mainly rely on descent-based transmission of citizenship, this additional form of territorial birthright citizenship ensures that the children of immigrants are also included in the nation. Interestingly, in Germany, the residence requirement for parents was lowered from eight to five years before the child's birth, as part of a broad 'modernisation' of German citizenship law in 2024. In section 3 of this report, we discuss more extensively how countries have adjusted their citizenship laws (or failed to do so) to the phenomenon of immigration.

## Beyond birthright

All states specify the grounds for birthright citizenship in their laws, but they do so in different ways, mixing the principles of descent and territory. Beyond birthright, in most countries, there are other pathways to become a citizen. In this section, we map these pathways, as well as the ways to lose citizenship.

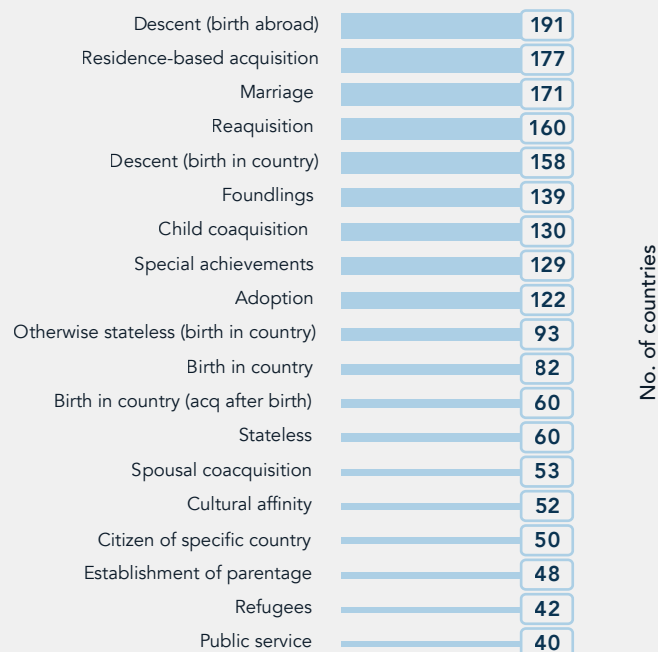
### Ways to acquire citizenship

When a person becomes a citizen of a country other than by birth, this is what we understand by 'naturalisation'. Ordinary immigrants living in a country other than the one in which they were born can naturalise after some period of residence in most, but not all, countries. Though, as we discuss in further detail in section 3, the requirements vary greatly country-by-country. Those who are married to a citizen often also benefit from facilitated access to citizenship, in terms of shorter residence periods or fewer requirements. However, several countries discriminate on the basis of gender, with facilitated citizenship for wives but not husbands of citizens. We discuss discriminatory rules like these in section 2 of the report.

Beyond these general rules, some states facilitate citizenship on 'special' grounds, such as the acquisition of citizenship by former citizens ('reacquisition'), adopted children, refugees, stateless persons, as well as persons considered to have made an extraordinary contribution to the country, for example in sports, the arts or science ('special achievements').

### 1.4 DIFFERENT PATHWAYS TO CITIZENSHIP

Frequency of 20 selected acquisition grounds across 191 countries | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3, selected modes

Finally, in a smaller group of countries, the law opens up a pathway to citizenship for economic investors, something that is frequently considered a controversial 'sale of passports'.

In the Americas, where countries apply territorial birthright to children born in their territory without any further conditions nearly universally, there is less need to formulate special acquisition grounds. For example, in Uruguay, one can only acquire citizenship by being born in the country or abroad to a Uruguayan. In Europe, by contrast, being born in the territory of a country typically does not entail an unconditional right to citizenship; at best, this will depend on the residence status or place of birth of one's parents. The laws of European countries, therefore, often include compensatory clauses for a lack of territorial birthright that ensure that the children of migrants have facilitated access to citizenship. For example, children as young as three years old who have lived in Sweden for that period can become Swedish, even if they were not born there. This is considerably easier than in Denmark, where one can only naturalise at the age of 18, if they have lived there since their 15th birthday and had their education in Denmark.

What matters is also how the law specifies the procedure to acquire citizenship. The pathway to Swedish citizenship mentioned above is a highly inclusive one, because when a minor child meets all the requirements, she has the right to acquire citizenship via a simple declaration by her parents. In many other cases, the acquisition under these facilitated conditions remains discretionary, which means that the authorities can still reject applications. In such cases, key questions are whether the authorities have to justify the negative decision and whether you have the right to appeal.

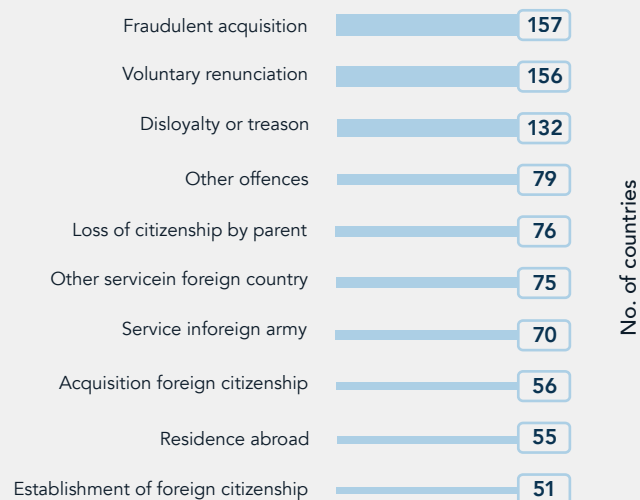
## Ways to lose citizenship

You will find rules on how to voluntarily renounce your citizenship in the laws of most countries. These rules often emphasise that you can only give up your citizenship as long as this does not leave you stateless. In a significant minority of 35 countries, however, citizens are stuck with their citizenship for life, as the law does not allow them to renounce it (or, in practice, makes it impossible), even when they can demonstrate they also hold the citizenship of another country.

Besides voluntarily renouncing citizenship, there are several ways to lose your citizenship, whether you want to or not. Most commonly, citizens risk losing their citizenship when they acquire another one if they are citizens of a country that does not allow dual citizenship. In some countries, the mere fact of residing abroad and holding another citizenship is enough to risk losing citizenship. There is a range of security-related grounds based on which governments may deprive persons of their citizenship. We discuss this in further detail in section 4 of this report. Finally, losing citizenship may not only affect your own security and life chances, but also that of your dependents, as a person's citizenship deprivation can extend to their children in 40% of countries.

## 1.5 DIFFERENT WAYS TO LOSE CITIZENSHIP

Frequency of 10 selected loss grounds across 191 countries | 2024



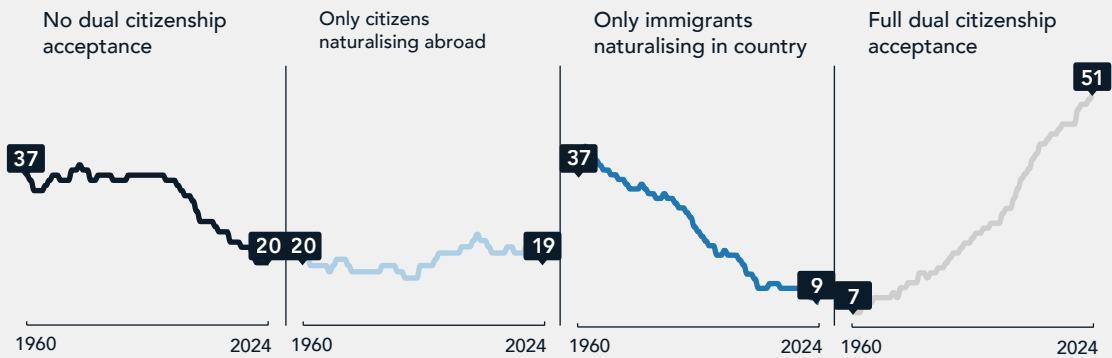
Source: GLOBALCIT Citizenship Law Dataset, v3, selected modes

## Increasing acceptance of multiple citizenship

One of the major trends across the globe is the increasing acceptance of multiple citizenship, whereby a person is recognised as a citizen by two or more states. These legal links to two states (or more, in case of 'multiple citizenship') are nowadays seen as an inevitable and generally unproblematic reflection of a globalised world where many people have either migrated across borders in their lifetime or are descendants of people who have done so. In other cases, such as after the break-up of Czechoslovakia, Yugoslavia, or the Soviet Union, people find themselves living in the same territory but belonging to a different political entity. Traditionally, dual citizenship was viewed as problematic due to citizens' potentially conflicting loyalties, especially in times of interstate armed conflicts. Which country would a dual citizen defend in case of war?

## 1.6 THE INCREASING ACCEPTANCE OF DUAL CITIZENSHIP AROUND THE WORLD, 1960 – 2024

Type of territorial birthright citizenship principle (excl provisions for foundlings) | 191 countries | 2024



Source: GLOBALCIT Dyadic Dual Citizenship Dataset, v3 | variable 'dualcit\_comb'

Citizenship laws include two kinds of restrictions on multiple citizenship. Most commonly, going back to the 1960s, a person would lose their citizenship when they voluntarily became a citizen of another country. They would often lose their citizenship automatically, i.e., without requiring any administrative act. Sometimes, the law gave administrative authorities the power to withdraw the citizenship of those persons who had acquired another citizenship. People face dual citizenship restrictions not only from the country of which they are already a citizen, but also from the country of which they want to become a citizen. In such cases, countries that grant citizenship require applicants for naturalisation to renounce their other citizenship before they can acquire the new one. Whereas the first dual citizenship restriction typically applies to citizens naturalising abroad, the second type of restriction applies to immigrants naturalising in a country.

Going back to 1960, we see that over 90% of countries restricted dual citizenship in one way or another. By contrast, in 2024, half of all countries fully accept dual citizenship, whereas only one-fifth consistently restrict dual citizenship at naturalisation. Almost a third of countries only accept dual citizenship for citizens naturalising abroad (19%) or only for immigrants naturalising in a country (9%).

Overall, when looking at the global regulation of citizenship, the big picture is one of great variety in how a person can acquire their citizenship of a country, as well as how one can lose it. This makes it challenging to ensure the universal right to a nationality. Mapping the global variety in citizenship regulation helps identify the gaps in international coordination and provides reform-minded policymakers with a clearer view of global trends.

2.

# Gender equality

Thematic lead: Ashley Mantha-Hollands

Everyone should have equal access to citizenship and be able to transmit their citizenship to their children irrespective of their sex, gender, and sexual orientation. While sex-based discrimination in citizenship law has globally declined over the past decades, it remains a cause of concern. This can be direct discrimination in the substance of the law itself, such as where the transmission of citizenship to children is not equal between men, women, or same-sex couples; or in laws that differentiate between men and women in the acquisition and retention of citizenship. Discrimination can also be indirect, which includes laws, policies, or regulations that create additional barriers for certain individuals to access or transmit citizenship but are not explicit in the citizenship law.

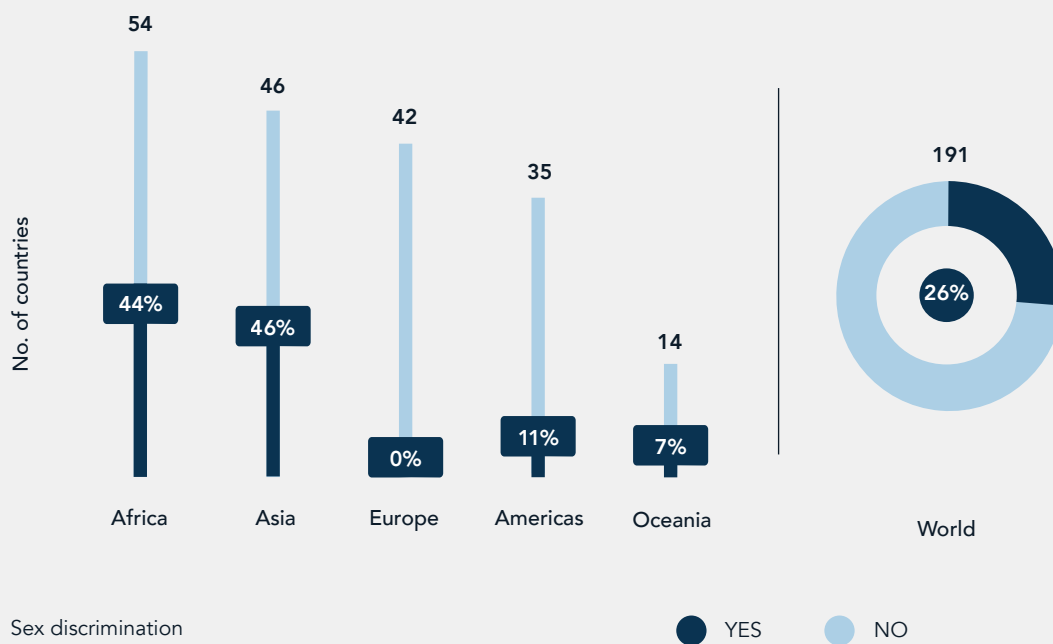
If individuals are not equally able to transmit citizenship to their children or spouse, this can result in cases where one or

both parents do not share the citizenship of their children, leading to potentially precarious situations where families are separated at borders, or, in the most severe cases, leaving children at risk of statelessness. Citizenship is thus critical for personal security and the well-being of the family unit. Additionally, citizenship often determines one’s right of entry, residency, and level of participation in political processes such as voting or candidacy rights. Inequality in access to citizenship can therefore lead to a lack of meaningful political representation.

Figure 2.1 charts the extent of direct sex-based discrimination for citizenship acquisition at birth or via marriage. Over the last century, many countries have reformed their citizenship laws to eliminate direct sex discrimination. However, our study finds that direct discrimination persists in the nationality laws of 50 out of 191 countries. Most countries

## 2.1 SEX DISCRIMINATION IN CITIZENSHIP ACQUISITION AT BIRTH AND BY MARRIAGE, BY WORLD REGION

Share and number of countries with gender discriminatory provision in citizenship law | 191 countries | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3, modes A01a, A01b, A02, A08

where we find this discrimination in nationality laws are in Asia, especially the Middle East, and North Africa. Direct sex discrimination has largely been eradicated in the countries in the Americas, with the exception of the Bahamas, Barbados, Dominican Republic, and Haiti, which continue to have discriminatory provisions.

While some of the practices of sex discrimination in citizenship law are declining, other forms of discrimination are evolving. The rise of alternative reproductive technologies means that a diverse range of family types are having and raising children. Policies, procedures, and legislation often have not caught up to include same-sex couples seeking to transfer both spouses' citizenship to their children. In other cases, states do not recognise the partnership of same-sex couples, who will then face discrimination in transferring their citizenship equally to their spouse or children (see more on this below).

### Birthright citizenship acquisition

In terms of citizenship transmission by descent, mothers cannot pass their citizenship to their children in 8% of countries when the child is born in the territory and in 11% of countries when the child is born abroad. Only fathers who are citizens can transmit citizenship to their children in these states. With regard to territorial birthright citizenship, we find the smallest number of countries (6%) with sex discrimination (those where citizenship can only be acquired if the father or grandfather was also born in the country).

Mothers cannot transfer citizenship automatically through descent-based citizenship acquisition for children born in the territory in 15 countries. Of these countries, Bahrain, Eswatini, Jordan, Nepal, Oman, Saudi Arabia, Syria, and the United Arab Emirates allow mothers to transmit their citizenship only to prevent statelessness if the father is unknown. In Iran, Kuwait, and Somalia, officials review applications by women, whereas the process is automatic for the father.

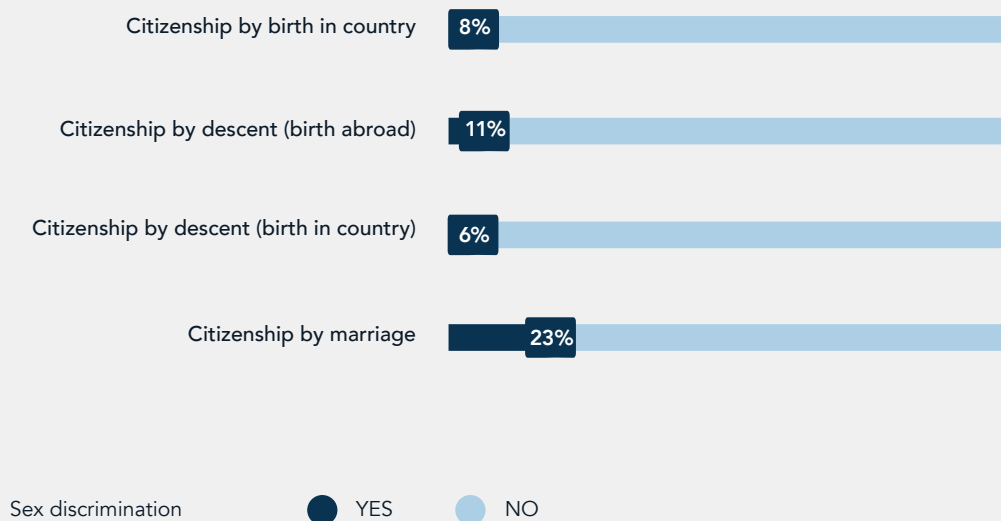
In addition to the 15 states just mentioned, five more discriminate in cases of children born abroad. A child born to a citizen mother of the Bahamas, Iraq, Libya, Malaysia, and Mauritania must apply for citizenship (and the procedure is discretionary). In contrast, it would be automatic in the case of a child born abroad to a citizen father. Children born abroad to Mauritanian mothers and foreign fathers can opt into Mauritanian nationality in the year before reaching majority at age 18.

The only country that differentiates unconditional territorial birthright based on sex is Haiti. A person born in Haiti to an alien father (and of African descent) will receive citizenship automatically. However, children of women who are aliens and of African descent can access Haitian citizenship only if the father of the child is unrecognised (i.e., not legally established on the birth certificate).

Children born in Morocco and Yemen to a non-citizen father who was also born in the territory can access citizen

## 2.2 SEX DISCRIMINATION IN CITIZENSHIP ACQUISITION AT BIRTH AND BY MARRIAGE, 2024

Share of countries with discriminatory provision | 191 countries | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3, modes A01a, A01b, A02, A08

ship, which would not be the case if the child were born to a non-citizen mother with the same qualifications. This is known as a *double ius soli* provision, and in these two countries, this provision exists with a differentiation based on the sex of the parent. In Tunisia, there is a similar provision where the grandfather of the child must also be born in the country (*triple ius soli*).

Children born to same-sex couples face further challenges. In 45 countries across the globe, it is illegal for a same-sex

couple to adopt a child, and there are even more countries where a non-biological same-sex parent cannot be legally recognised as a parent. The regulations that prevent the recognition of same-sex parenthood or adoption are often not in the citizenship law itself but in the state’s family law and parental recognition guidelines, which affect the child’s access to citizenship. For example, in Italy, same-sex couples cannot be registered as parents and thus, cannot transmit citizenship automatically to a child if they are the non-biological parent.

DID YOU KNOW?

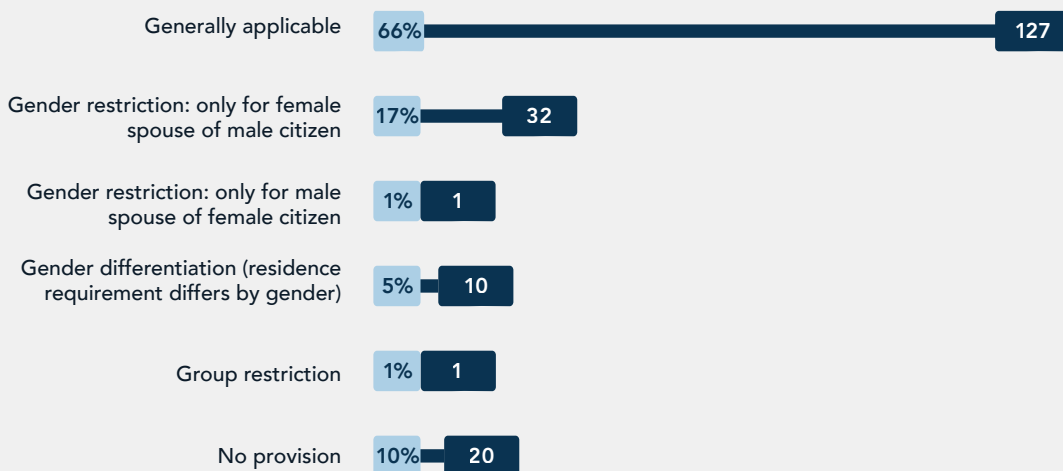
Surrogacy is a “universal crime” in Italy

In October 2024, Italy passed a law that would make surrogacy a “universal crime,” leaving children born through this modality at risk of statelessness. Italian municipalities have been directed not to register children born through surrogacy, which is a crucial step

in the acquisition of Italian citizenship. Moreover, couples travelling abroad to have a baby through an international surrogacy arrangement could face up to two years in jail and a fine of one million euros. This law disproportionately affects same-sex couples who do not have the right to adopt in Italy. This case shows how adjacent laws and policies can affect equality in the acquisition of citizenship.

2.3 MARRIAGE-BASED CITIZENSHIP ACQUISITION

Share and number of countries with type of provision providing facilitated access to citizenship for spouses of citizens | 191 countries | 2024



Share and number of countries

Source: GLOBALCIT Citizenship Law Dataset, v3, mode A08

## Marriage-based acquisition of citizenship

Direct sex discrimination is most common in citizenship laws pertaining to marriage acquisition, as we find this present in 43 countries. In these cases, only women acquire their spouses' citizenship (17% of countries), or the requirements are different for the two sexes in transferring citizenship to their spouse (5% of countries).

These data do not cover the cases where spousal transmission is not possible for same-sex couples, as this limitation tends to be embedded in legal areas such as the family law of the state or in the constitution. Discrimination in spousal transfer is far greater if expanded to include these adjoining legal areas. In **110 countries**, same-sex marriage or registered partnerships between same-sex couples are illegal, and there are a further 36 countries where same-sex marriage is unrecognised, only allowed in cases of foreign marriages, or considered unregistered cohabitation. Based on these figures, if including same-sex couples, there are at least 146 countries where there is no equal access in spousal transfer of citizenship.

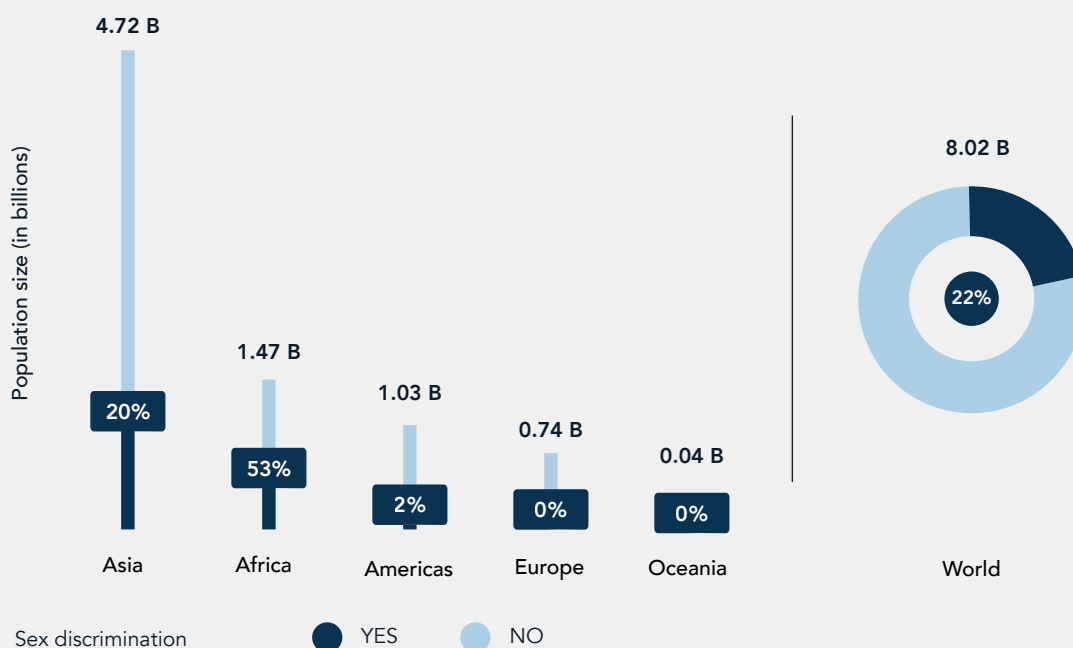
## Sex discrimination in a global context

Figure 2.4 visualises the share of the world population affected by direct sex discrimination in the law, i.e., where there is discriminatory legislation that differentiates between men and women. The largest population living in countries with sex discriminatory citizenship laws is on the African continent (53%). In Asia, 20% of the population lives in countries with sex discriminatory citizenship laws. By comparison, only 2% of the population of the Americas lives in such countries, while direct sex discrimination has been eliminated in Europe and Oceania.

In reality, the number of individuals living under discriminatory citizenship regimes is much higher if we consider cases of indirect discrimination or discrimination that occurs in a related legal area affecting citizenship acquisition (e.g., family law).

### 2.4 LIVING UNDER SEX DISCRIMINATORY CITIZENSHIP LAW

Share of affected population, globally and by world region | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3, modes A01a, A01b, A02, A08; World Development Indicators

## Global Campaigns for Equal Nationality Rights

It used to be common practice for states to discriminate based on sex in their citizenship law. The general logic was that a family should have one nationality (as it would have one surname) – the father’s nationality would extend to the whole family. Thus, upon marriage, the female spouse would acquire the nationality of her husband and subsequently lose her own. The result was that many women wound up becoming stateless if the marriage ended.

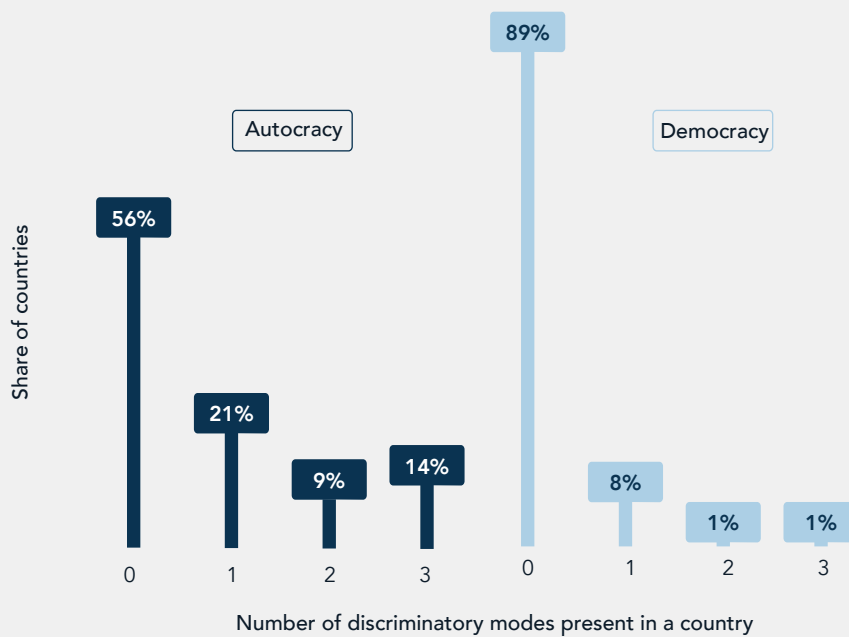
The Hague Convention on Certain Questions Relating to the Conflict of Nationality Law (1930) launched a global campaign to safeguard women’s nationality. However, it was not until the 1933 Montevideo Convention on the Nationality of Women that the principle that marriage or its dissolution would no longer affect the nationality of a woman, and her children, was established. In 1957, the Convention on the Nationality of Married Women established the independent nationality of married women and was adopted by the UN General Assembly.

The most consequential piece of international law that promises equality in citizenship acquisition, loss, and transmission is the *Convention on the Elimination of All Forms of Discrimination against Women*

(CEDAW), adopted by the UN in 1979. Article 9 of the Convention protects against discrimination in citizenship law, stating that “States Parties shall grant women equal rights with men to acquire, change or retain their nationality” and “States Parties shall grant women equal rights with men with respect to the nationality of their children.” Since then, many countries have reformed their citizenship laws to not differentiate between men and women. However, even though all individuals enjoy the right to a nationality under the Universal Declaration of Human Rights, it is still up to each sovereign state to decide the rules relating to its acquisition and loss. This means that there is substantial variation across the world in states’ citizenship laws, and the reason why inequality persists despite international legal guarantees. Recently, there has been an even greater push to end sex discrimination in citizenship law through the Sustainable Development Goals 2030, which seek to end gender discrimination and ensure everyone has a legal identity. The UNHCR launched its “IBelong Campaign to End Statelessness” in 2014, which hoped to achieve gender equality in all nationality laws by 2024. Since the launch of the campaign, however, only three countries (Madagascar, Sierra Leone, and Liberia) have reformed their nationality laws to allow mothers to transmit citizenship equally to their children.

## 2.5 SEX DISCRIMINATION IN CITIZENSHIP LAW, BY POLITICAL REGIME

Mean (autocracy) = 0.9 | Mean (democracy) = 0.1 | 179 countries | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3, modes A01a, A01b, A02, A08 | V-DEM v2x\_regime

Figure 2.5 represents the number of direct sex discriminatory citizenship provisions present in the citizenship law of a state by regime type (democracy or autocracy). Countries with more sex discriminatory citizenship laws are generally more autocratic than democratic. This does not mean that all autocratic countries have discriminatory laws. In fact, our data show that many autocracies do not have direct discrimination in their citizenship laws. Nevertheless, it does show that there is less direct sex discrimination in citizenship laws in countries that are democratic.

### Beyond the law

This section of the report has primarily focused on sex discrimination that is explicit in a state's citizenship law. Even so, discrimination may also occur in the constitution or in the family law of a state (such as with the right to same-sex marriage or adoption), thus influencing citizenship acquisition or transmission.

In addition, discrimination in the law, policies and procedures that states use to implement their citizenship law can indirectly discriminate against certain groups. This would include cases where requirements for citizenship are more challenging for one group to fulfil than others. For example, naturalisation requirements that overemphasise economic requirements could negatively impact female applicants, as

women often do not share in the same material wealth or are offered the same economic/educational opportunities as men.

Another relevant example is where administrative and legal documents do not allow individuals to self-identify their gender, or their sex designation cannot be changed on their official documentation after birth (for example, on a birth certificate). Less than 30 countries globally have adopted a third gender identity marker ("X") on passports or other citizenship-related documents. Countries that do not allow or recognise a nonbinary identity marker or do not allow individuals to update their gender identity/sex designation create additional barriers and risks for transgender, intersex, and nonbinary people in the acquisition or transmission of citizenship.

One of the challenges going forward in pushing for equal access in citizenship law will be to widen the scope of what we understand as gender-based discrimination. First, this should be beyond the binary of women in relation to men and include other gender identities and sexual orientations. And second, it should capture the discrimination that occurs indirectly in adjacent legal or policy fields that can affect the acquisition or transmission of citizenship, such as in parental establishment policies that do not legally recognise certain types of parenthood.

3.

# Immigrant inclusion

Thematic lead: Thomas Huddleston

Most people take it for granted that they are a citizen of the country where they live. Yet, for immigrants – people who are living in one country while they were born in another—becoming a new citizen signals a key moment in the lifelong processes of inclusion and belonging.

Becoming a citizen is essential to the social, economic and democratic well-being of immigrants. Ample [research](#) has demonstrated how this ‘[citizenship premium](#)’ benefits immigrants in terms of their life decisions, rights, civic integration and sense of belonging. Destination countries with large, long-settled immigrant populations need to provide a clear pathway to citizenship, to promote their socio-economic development, societal trust and a healthy democracy. Citizenship is most important for immigrants with strong family ties to the country, particularly with children born or educated there, as well as for vulnerable immigrants coming

from lower-income countries, particularly from conflict zones.

The challenge of the so-called ‘ordinary naturalisation’—in other words, citizenship acquisition based on residence in a country—is that the policy should recognise the effective links, ties and interests that bind immigrants to their new adopted home. Both national and foreign citizens must respect the law and their civic responsibilities. But, unlike immigrants, most citizens were born and have always lived in the country. So, are naturalisation requirements based on what all citizens of a country have in common? Or, in the quest for the ‘[perfect citizen](#),’ do countries expect more of immigrants than they expect of their own citizens? How can ordinary naturalisation be transformed from a form of exclusion to a [catalyst for inclusion](#)?

## Diverging pathways to citizenship for immigrants

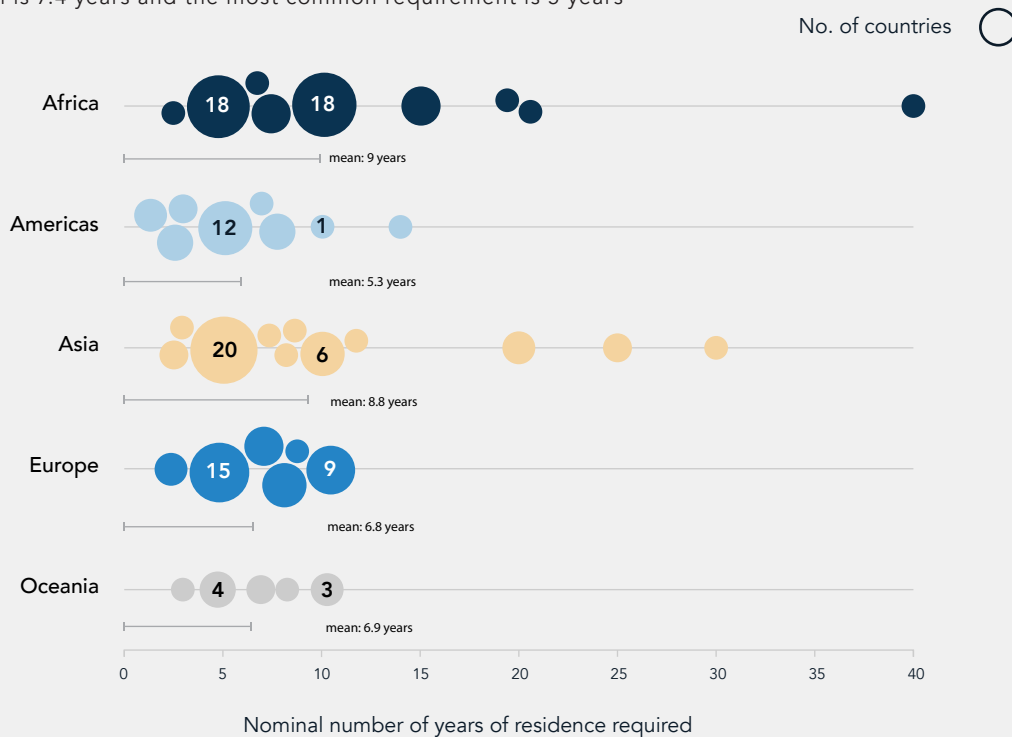
Immigrants’ pathways to citizenship diverge significantly around the world on a wide-ranging scale from inclusion to exclusion. On one end of the scale, in a few countries, immigrants who respect all the country’s laws can naturalise after just a few years, with little else required. On the other end of the scale, a country may require immigrants to wait 40 years to apply, renounce their previous citizen-

ship and prove their good conduct, their economic self-sufficiency and their knowledge of the country’s national language(s), culture, habits and customs. Legally, naturalisation is even impossible for around 9 million foreign-born immigrants (3% of all immigrants worldwide) who live in one of 13 nations that lack any ordinary naturalisation procedure: China, DRC Congo, Kuwait, Liberia, Micronesia, Myanmar, Nauru, Nepal, North Korea, Palau, Seychelles, Sri Lanka and Yemen.

## DID YOU KNOW?

## 3.1 FIGURE 3.1 NOMINAL YEARS OF RESIDENCE REQUIRED FOR ORDINARY NATURALISATION, BY WORLD REGION, 2024

The global mean is 7.4 years and the most common requirement is 5 years



Source: GLOBALCIT Citizenship Law Dataset, v3, mode: A06\_yrs

Worldwide, the legal requirements for ordinary naturalisation are most inclusive in traditional migrant destination countries, the Americas and Western Europe, uneven in Africa and South/Southeast Asia, and most restricted in Central/Eastern Europe, East Asia, the Middle East/Gulf States and Oceania. While global reform trends mean that immigrants are increasingly benefiting from multiple citizenship, as well as territorial birthright citizenship for their children, they face vastly different legal requirements for naturalisation around the world, shaped by each country's national debates and histories.

## Residence requirement

The universal requirement for ordinary naturalisation is residence, as all countries require legal residence of at least a few years. Over time, immigrants can develop effective links, decide to naturalise and be able to meet all the substantive requirements. So, how long do countries make ordinary immigrants wait before they are officially 'eligible' to apply?

A majority of immigrants around the world face ordinary naturalisation requirements of five years (58%) or less (9%) in around half the world's countries. Five years is the most common residence requirement across all regions except Africa, where the requirements are evenly split between five and ten years. Immigrants benefit from shorter residence requirements in 17 countries, particularly in the Americas.

Globally, the average required period is seven years. One-third of the world's foreign-born live in countries that require more than five years of residence. One in four countries requires 10 years (39 countries) or more (15 countries). In Europe, the 1997 [European Convention on Nationality](#) sets the maximum residence period for naturalisation at 10 years in states that have ratified the Convention, whereas periods of over 10 years persist in Africa and Asia. An estimated 19 million immigrants (or 6% of the world's foreign-born) live in the 15 countries where the wait is more than 10 years for ordinary naturalisation: Equatorial Guinea (40), United Arab Emirates (30), Bahrain (25), Qatar (25), Bhutan (20), Brunei (20), Eritrea (20), Oman (20), Chad (15), Gambia (15), Nigeria (15), Rwanda (15), Sierra Leone (15), St. Kitts and Nevis (14), and India (11). These long delays effectively bar many—if not most—immigrants who may be otherwise eligible to meet the main language, integration, economic, and good character requirements.

Years of residence are not the only part of the residence requirement, because not all years of residence are always counted towards naturalisation. As a result, short residence requirements are not always shorter in practice. Countries sometimes require naturalising immigrants to have permanent and/or continuous/uninterrupted residence. Permanent residence usually means that immigrants must first obtain permanent or long-term residence permits. The path

to permanent residence is often a five-year wait, longer and uncertain for temporary residents (students, temporary workers, humanitarian migrants). Requiring permanent residence is sometimes defended as one of the ways of making citizenship ‘migration-neutral’, meaning that immigrants should first secure their residence in the country before they can secure its citizenship. In addition, some countries will only count an applicant’s years as a permanent resident when calculating their residence period for naturalisation. Similarly, continuous or uninterrupted residence requirements only allow for short or no periods of absence from the territory or delays in renewal of residence permits. Such a gap in an applicant’s paperwork can set the naturalisation clock back to zero, effectively erasing an applicant’s eligibility and adding years, if not decades, to the wait.

## Of ‘good character’

The second near-universal requirement for ordinary naturalisation is ‘good character’ or the absence of a criminal record. The overwhelming majority of foreign residents are law-abiding and thus eligible for naturalisation. While there is no demonstrable link between crime, migration and naturalisation, one of the state’s core duties is to secure peace and security for its citizens and residents. It runs against public interest to naturalise people in criminal proceedings or under investigation as serious threats to public security. The reason is that naturalisation would grant these suspects the state’s diplomatic protection, protection from deportation as well as access to public office and jobs exercising public authority. At the same time, democratic societies support the principle of rehabilitation of former criminals who have served their time. If their offence was not grounds for deportation, then former criminals may have the chance to prove their commitment to be law-abiding residents. So, which immigrants are barred from ordinary naturalisation?

Nearly all naturalising immigrants worldwide must have ‘good character’ or a clean criminal record. These requirements are used by liberal democratic regimes to exclude, for example, applicants accused of human rights abuses, but also by more autocratic regimes to exclude, for example, persons who have exercised their freedom of speech or religion, while terrorism figures as a ground in both types of regimes. There is substantial variation between countries, whether democratic or autocratic, with regard to what crimes lead to excluding immigrants from naturalisation. For example, in Austria, several administrative fines for minor traffic violations lead to permanent exclusion.

In 35% of countries, where almost half of the world’s foreign-born live, applicants must prove a good moral character for ordinary naturalisation. This requirement is particularly prevalent in Oceania (64%) and the Americas (49%). Good character requirements range from the general requirements that apply equally to immigrants and citizens (i.e., payment of fines and taxes) to vague assessments that apply only to the naturalisation procedure. According to data on procedures in Europe, the documentation and grounds used in these assessments are rarely public. Immigrants must often obtain costly, complicated documentation from their country of origin, such as a recent copy of their birth certificate and criminal record.

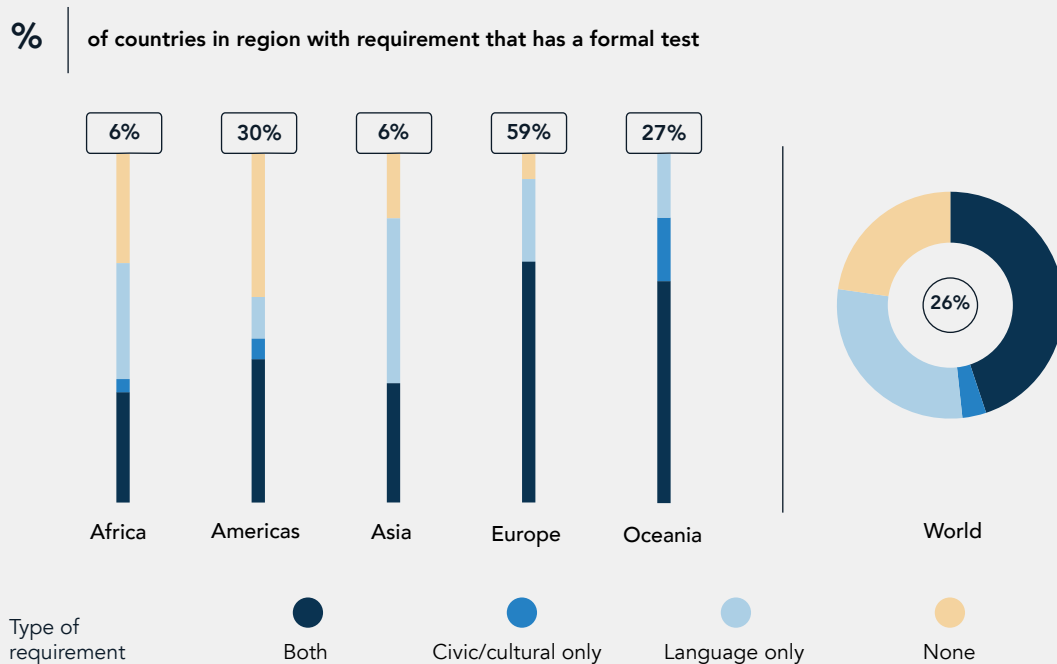
Beyond good character requirements, criminal record requirements are more restrictive in Asia and Europe, where a majority of countries conduct a more detailed criminal record check, with exclusion for certain crimes and offences. Only 14 countries do not have a criminal record requirement: Central African Republic, Colombia, Cuba, Dominican Republic, Eswatini, Haiti, Israel, Kosovo, Lebanon, Serbia, Suriname, Uzbekistan, Venezuela, and Vietnam. That said, naturalisation is a highly discretionary procedure in nearly all countries, which retain the power to reject applicants on often vague grounds of state interest.

## Language and integration

The fact that most countries require language knowledge for ordinary naturalisation belies a deeper disagreement about the meaningfulness of language and, especially, integration requirements. Over time, immigrants deepen their roots, skills and knowledge in many different ways that cannot be measured or demonstrated for authorities. Despite this impossible task, ordinary naturalisation usually requires applicants to provide evidence of their effective links to the country. Naturalisation officials often see it as their role to ensure that new citizens are informed and ready to take up the rights and responsibilities of national citizenship, all while maintaining public support for welcoming new citizens as their equals. Yet demanding—but without supporting—language and civic integration can transform these requirements from potential incentives into effective obstacles for naturalisation.

## 3.2 LANGUAGE AND ASSIMILATION REQUIREMENT IN RESIDENCE-BASED NATURALISATION, 2024

Share of countries with language and/or civic knowledge/cultural assimilation requirement



Source: GLOBALCIT Citizenship Law Dataset, v3, modes A06c-A06d

While nearly all countries worldwide have one or more official languages, not all citizens are fluent in the same language at the same level. Most citizens had the opportunity to learn at least one official language at school. Most immigrants are able to demonstrate their willingness to learn a new language in some way. However, immigrants' actual language competences are strongly linked to their previous educational opportunities, socio-economic status, current age and evolving mental or physical capacities. Most strikingly, data on 56 global destinations from the [Migrant Integration Policy Index \(MIPEX\)](#) finds that most countries do not provide enough hours of state-funded language courses for immigrants of all educational backgrounds to obtain the language level required for naturalisation. Furthermore, [language learning tools like the Common European Framework of Reference for Languages \(CEFR\)](#) were never intended as requirements for access to rights and citizenship. This wider context of language learning challenges naturalisation requirements to account for the fact that a person's language skills depend not only on their willingness to learn a new language, but also on their personal background, abilities and level of support.

This challenge is even greater for the requirements of proof of so-called integration, assimilation or civic knowledge. While nearly all ordinary naturalisation procedures require immigrants to fulfil the same civic responsibilities and

good character requirements as national citizens, what additional proof can governments ask of naturalising immigrants? [National education curricula differ significantly](#) in whether, how and what national pupils must be taught as 'citizenship education', including a wide range of civic and cultural knowledge and beliefs. What knowledge, beliefs, or behaviour, therefore, should make someone eligible for citizenship?

Language knowledge is one of the most common requirements worldwide used for immigrants to test their ability to participate in the public life of their new country of citizenship. 82% of the world's foreign-born live in the 130 countries that require ordinary immigrants to know at least one of their official languages to naturalise as citizens. That said, the explicitly high language requirements we see in European states (like B1 or even B2 on the CEFR) are rare worldwide. The remaining 46 countries without a language requirement are smaller destination countries, most notably Chile, Ireland, Kazakhstan, Saudi Arabia, Serbia, Sweden, as well as several countries in Africa and the Americas.

Beyond language, assimilation or integration requirements are among the less common requirements for ordinary naturalisation. In particular, language or citizenship tests emerge globally as the least common requirement for naturalisation. Ordinary immigrants must pass a specific language or citi-

zenship test in only around 30 countries (or 15% of all countries). This shortlist includes the largest, established destination countries—home to half of the world’s foreign-born, such as Australia, Canada, the United States, and half of all European countries.

Moreover, the content of integration requirements or civic knowledge tests can be vague and subjective, as demonstrated by the range of requirements presented below:

Most integration requirements go far beyond a simple oath or declaration of loyalty to their new country of citizenship. Usually, immigrants are expected to prove specific knowledge, which is just as often cultural (i.e. the country’s customs, geography, history) as civic (i.e. citizenship rights and responsibilities, constitution, laws). Moreover, across all world regions, most language and integration requirements are highly discretionary. According to data from Europe, language and integration assessments are often the most dis-

## DID YOU KNOW?

### Range of integration requirements for ordinary naturalisation

<b>Austria</b>	Person has knowledge of the democratic order and history of the country and of the federal province responsible for the administration of naturalisation. Person must take a citizenship oath.
<b>Belgium</b>	Person provides evidence of adequate social integration and work participation, unless person demonstrates that he/she cannot work due to a handicap or invalidity or is retired.
<b>Canada</b>	Knowledge of Canada and the responsibilities and privileges of citizenship required. Person must attend a citizenship ceremony and take a citizenship oath.
<b>Colombia</b>	Knowledge of basic principles of the Constitution, history and geography of Colombia (except for those who are from an indigenous community sharing border territory with Colombia, had secondary or university education in Colombia, or older than 60 years).
<b>Greece</b>	Sufficiently familiar with Greek history and geography and smoothly integrated into the economic and social life of the Country.
<b>Latvia</b>	Knowledge of basic principles of the Constitution, national anthem and history of the country, and pledge of loyalty to Latvia required.
<b>Luxembourg</b>	Person must attend ‘Living together’ course or pass the test of this course.
<b>Nigeria</b>	Person is assimilated into the way of life of people in that part of the Federation where she is naturalised.
<b>Timor-Leste</b>	Moral and civic guarantees of integration into Timorese society required, as well as knowledge of the history and culture of Timor-Leste.

cretionary part of the procedure, conducted by immigration officials or even the police, without integration professionals, sufficient support, clear guidelines, alternative documentation options or strong judicial review. Exemptions are few, for minors, the elderly or persons with severe mental or physical disabilities.

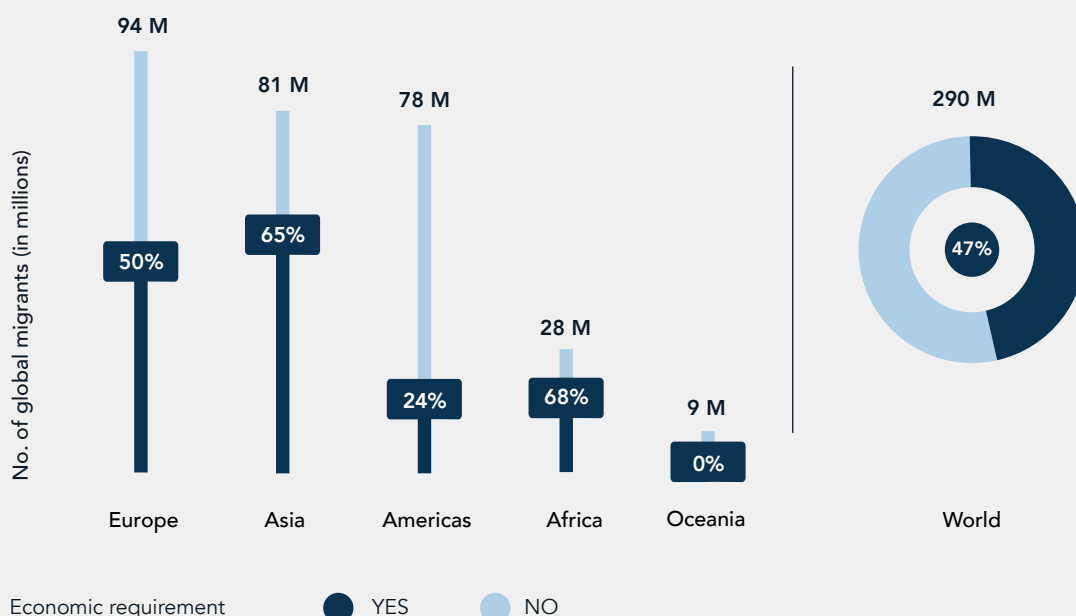
### Economic self-sufficiency

Over time, immigrants’ economic and financial links usually become stronger with their country of residence than with their country of origin. Still, effective economic participation does not always mean economic ‘independence’. Requiring economic ‘self-sufficiency’ for citizenship challenges democratic and non-discrimination principles. Not all citizens are working, university-educated, financially independent or homeowners. A person’s socio-economic status is influenced by their gender, age, education, health/disability status and belonging to discriminated social groups. Universal suffrage has, for nearly a century, secured that a person’s socio-economic situation is no longer a condition for the full and equal franchise. However, since voting rights in national elections remain tied to citizenship status in nearly all countries, denial of access to citizenship on the grounds of lack of economic means amounts to perpetuating inequalities of economic class in political participation rights.

Half of the world’s foreign-born live in the 107 countries where ordinary immigrants must be economically ‘self-sufficient’ to become citizens. Under these requirements, immigrants must often do much more than simply meet their basic needs and secure their livelihood. Indeed, only around one in five countries require immigrants to have a basic income and pay their tax obligations. The majority further restrict ordinary naturalisation to immigrants with ‘sufficient’ employment income to cover their family’s costs, often without any state support, such as unemployment benefits or social assistance. In some countries, ordinary naturalisation is only open to those with accommodation or property ownership or to individuals with exceptional contributions. For example, Tanzania requires ordinary applicants to prove their ‘contribution to the national economy, scientific and technological advancement and the national social and cultural welfare.’ Data on procedures in Europe suggests that few legal exemptions are allowed for these requirements. While ‘self-sufficiency’ requirements can be criticised as implicitly discriminatory, at least two dozen countries in Africa, Asia and the Middle East are explicitly discriminatory on age and disability grounds by rejecting applicants based on their physical health, mental health, incapacities or disabilities.

### 3.3 ECONOMIC REQUIREMENT IN RESIDENCE-BASED NATURALISATION, 2024

Share of global migrants that must meet economic requirement to naturalise



Source: GLOBALCIT Citizenship Law Dataset, v3, mode: A06e | Population data from UN Population Division

## Renouncing foreign ties

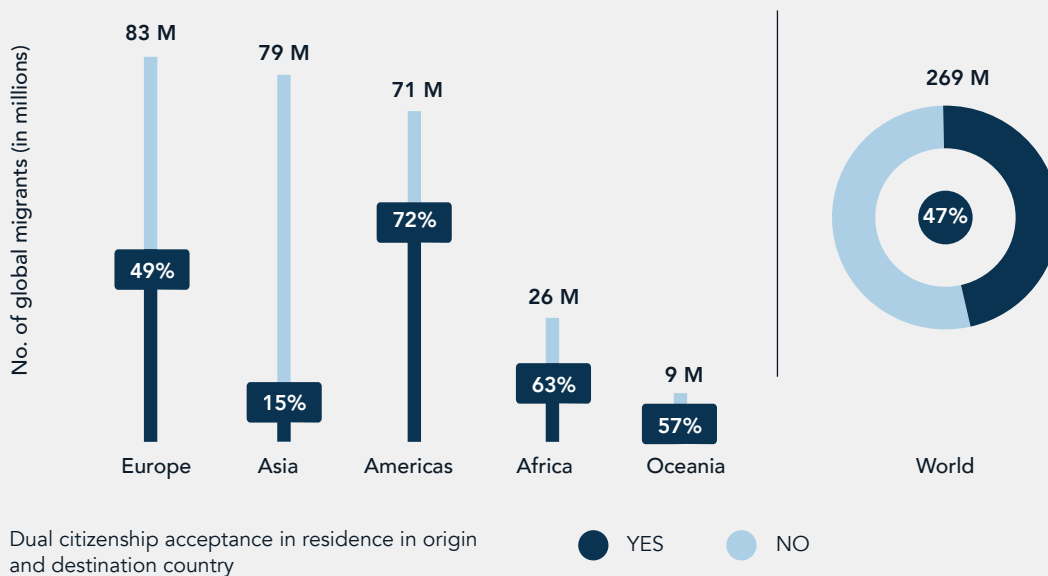
The requirement to renounce any foreign citizenship, increasingly a relic from the past, has become the least common requirement for ordinary naturalisation. In a mobile, connected world, many people—not just immigrants—have effective links with more than one country, as part of their family, ancestry, work, studies or lifestyle. Dual citizenship helps people to manage these links, with the right to reside, visa-free travel, diplomatic protection, and often electoral, economic and property rights. Both states and citizens have worked out ways to manage the rights and responsibilities that come with multiple nationalities. Even governments that oppose multiple citizenship on paper often cannot avoid it in practice. For example, states want to maintain links with their own expatriate citizens abroad. Moreover, renunciation can be impossible or unreasonable for immigrants from some countries of origin. Some countries consider citizenship as a perpetual allegiance that individuals cannot revoke; refugees cannot be asked to get permission for renunciation from an origin country where they have been persecuted; states engulfed in armed conflict and civil war cannot issue the relevant documents; and some origin

states charge exorbitant costs for releasing their citizens. Even host countries that oppose dual citizenship for their immigrants often have to permit it in such cases. Overall, fears about dual citizenship have often proven unwarranted in terms of their potential to create integration or interstate conflicts, while international agreements have shifted from preventing to managing multiple nationalities, for example, on potentially conflictual issues like taxation or military service. As discussed in section 1 of this report, dual citizenship has slowly spread as a major liberalisation trend, although the diffusion of this norm still varies across world regions.

Yet, immigrants can only legally become dual nationals if this is accepted by both their destination and origin countries. As visualised in Figure 3.4, currently almost half of the world’s foreign-born immigrants (47%)—an estimated 125 million people—can become dual nationals because both their country of origin and residence allow for this. Dual citizenship acceptance is especially restricted for migrants in Asia, where only 15% can naturalise while remaining a citizen of their country of origin. The restriction of dual citizenship remains a major obstacle depressing immigrants’ interest in becoming citizens of their new country of residence.

### 3.4 DUAL CITIZENSHIP ACCEPTANCE IN RESIDENCE-BASED NATURALISATION, BY WORLD REGION, 2024

Share of global migrants that can naturalise with dual citizenship acceptance in both destination and origin country



Source: GLOBALCIT Dyadic Dual Citizenship Dataset, updated with data for 2023 and 2024 | Population data from UN Population Division

## Bringing it all together

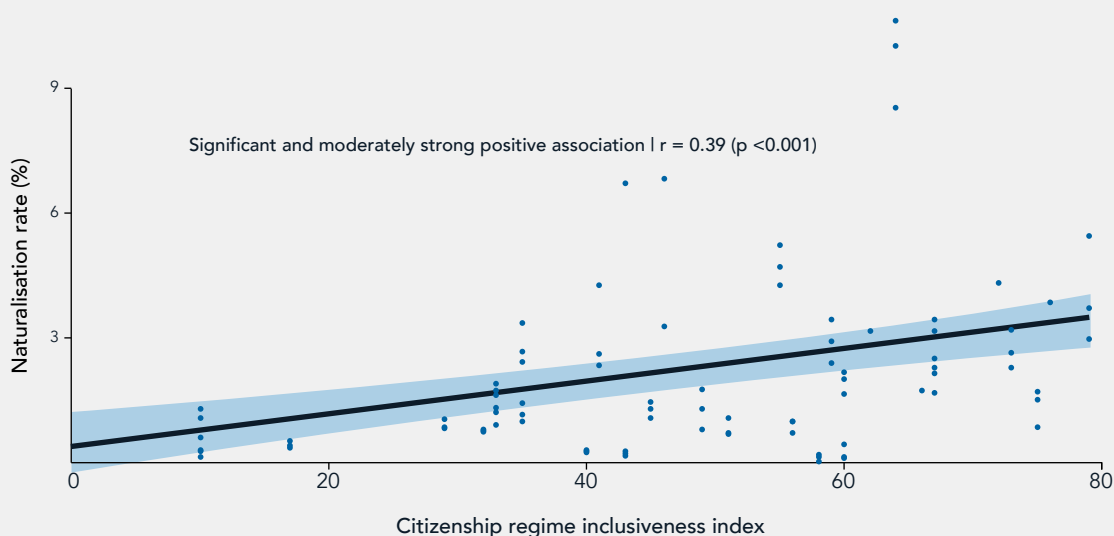
Overall, ordinary naturalisation policies are one of—if not the strongest—factors shaping ordinary immigrants’ opportunity and propensity to become citizens of their new country, according to the [many international studies linking naturalisation rates with policies](#). To illustrate this relationship, we aggregate the indicators discussed above into an index of citizenship law inclusiveness (using the [aggregation formula developed by Samuel D. Schmid](#), with higher scores indicating more inclusive laws) and compare the scores on this index with citizenship acquisition rates among high-income OECD destination countries.

The positive correlation between the inclusiveness of citizenship laws and acquisition rates indicates that, indeed, immigrants are more likely to acquire the citizenship of their country of residence under more facilitated institutional conditions. The association is moderately strong ( $r = 0.39$ ) as, on average, countries need to move up 25 points on the 100-point inclusiveness scale to achieve an increase of one percentage point in immigrants’ naturalisation rates. The correlation cannot be perfect as naturalisation rates are also influenced by demographic factors, such as the number of recent immigrants who do not yet meet residence requirements, and origin country factors, including the level of development and citizenship policies of these states.

That said, the legal requirements tell only one half of the story. Worldwide, over 90% of all ordinary naturalisation procedures are discretionary, meaning that applicants who meet all the legal requirements can still be rejected on various grounds. Only around 20 countries provide an entitlement to ordinary naturalisation in their laws. [Research from Europe](#) finds that applicants face not only significant discretion, but also significant documentation, bureaucracy and costs, all with limited state support, public information and judicial review. Implementation is likely an even more important issue in lower-income or autocratic countries, with greater gaps in the rule of law.

### 3.5 CITIZENSHIP ACQUISITION RATES BY REGIME INCLUSIVENESS

Each dot represents a score for citizenship acquisition rates and regime inclusiveness of a country in a year



Source: GLOBALCIT Citizenship Law Dataset, v3, modes: A06\_yrs, A06b-A06f

4.

# Security of status

Lead author: Luuk van der Baaren

Citizenship stripping is back on the political agenda. In Europe, for example, in the first half of 2025, a [Swedish government inquiry](#) recommended a constitutional overhaul allowing for the revocation of Swedish citizenship from individuals threatening national security. Meanwhile, a [leaked proposal](#) shows that Germany’s coalition parties discussed the revocation of citizenship for “supporters of terrorism, antisemites, and extremists”, and Hungary introduced a [highly controversial constitutional amendment](#) to allow for the temporary suspension of citizenship on security grounds.

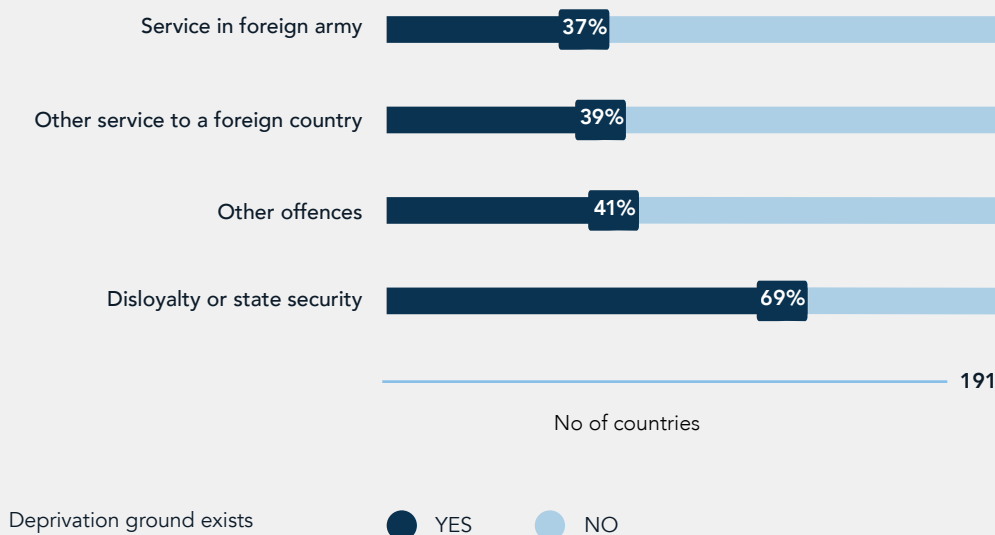
These developments raise an important question: to what extent is the status of citizenship as a secure legal status being undermined? This section explores the global incidence of security-related citizenship revocation provisions, recent legislative trends, and the extent to which these align with international legal standards.

## What is citizenship stripping?

Citizenship law not only regulates how you can acquire citizenship, but also how you can lose it. Revoking citizenship is highly contentious. Being deprived of one’s most fundamental legal status carries profound consequences, such as losing citizens’ rights and, in some cases, becoming stateless and unable to return to any country. In most countries, individuals are permitted to voluntarily renounce their citizenship, provided that they will not become stateless. However, states may also decide to revoke citizenship involuntarily. The grounds for citizenship stripping are often security-related, as such measures are often justified as a means of protecting national interests or preserving the security of the state. The practice of citizenship stripping has sparked [significant debate](#), particularly in the context of an increasing securitisation of citizenship in the post-9/11 era.

### 4.1 PREVALENCE OF SECURITY-RELATED MODES OF CITIZENSHIP DEPRIVATION

Share of countries with type of deprivation rule | 191 countries | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3 | modes L03, L04, L07, L08

A global study conducted by GLOBALCIT together with the Institute for Statelessness and Inclusion (ISI) reveals that between 2000 and 2020, the use and scope of citizenship revocation on security grounds has expanded. This ‘securitisation’ trend is especially pronounced in Europe, where 18 countries expanded their powers to deprive persons of citizenship on grounds of national security or as counter-terrorism measures. The MENA is another region where the states’ deprivation powers significantly expanded over this period.

## Global patterns of citizenship stripping

Our dataset contains four ways in which citizens can be stripped of their status on security grounds:

- Service in a foreign army
- Other (non-military) service to a foreign country
- Disloyalty or state security
- Other offences

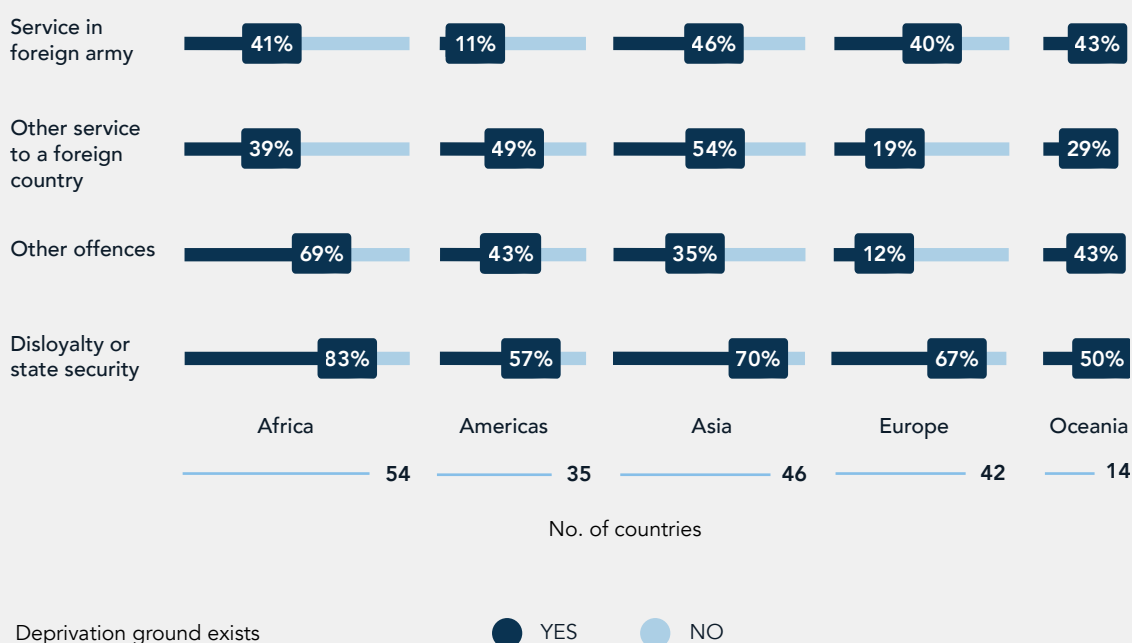
How common are security-related loss provisions? Overall, nearly 80% of countries have incorporated at least one of these four grounds for loss in their citizenship legislation.

A closer look reveals notable regional differences. It is apparent that disloyalty or state security (such acts of treason or terrorism) is by far the most common reason for deprivation. Overall, 132 countries provide for loss of citizenship on this ground. Such provisions are common across all world regions, with a prevalence ranging from 50% in Oceania and 67% in Europe to 83% in Africa. For the other grounds of citizenship deprivation, there is more regional variation. Provisions for loss due to military service or other services to a foreign state are relatively common in Africa and Asia but are not as common in other regions. The same can be said for loss of citizenship due to other offences (i.e., not relating to disloyalty); while two-thirds of African countries provide for loss of citizenship due to other offences, only 12% of European countries provide for loss on that ground.

What is the legal procedure for stripping a person of their citizenship? In most countries, citizens can only lose their citizenship through an act of deprivation by the authorities, which means that state authorities must actively decide to deprive a person of their citizenship. In a minority of cases, loss of citizenship takes place by a “lapse” procedure, which means that citizenship is automatically lost the moment a person commits a certain act. However, lapse of citizenship can only be enforced once the authorities discover that such an act has taken place.

### 4.2 PREVALENCE OF SECURITY-RELATED MODES OF CITIZENSHIP DEPRIVATION, BY WORLD REGION

Share of countries with type of deprivation rule | 191 countries | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3 | modes L03, L04, L07, L08

## Service in a foreign army or other service

If you serve in a foreign army, you risk losing your citizenship in 70 countries. Citizens in 52 countries can lose citizenship in this way, while in 18 countries, such deprivation only applies to certain groups of citizens, typically those who acquired citizenship by naturalisation. For example, in Chad, naturalised citizens can be stripped of their citizenship for holding a position in a foreign army. In some countries, you can lose your citizenship when you provide military service to hostile states, while in others, service to *any* foreign military puts your citizenship status at risk. However, in most cases, a person can only be deprived of their citizenship if a warning has been issued, and they fail to abandon military service after that. In the Chadian case, for example, citizens can only lose citizenship on this ground if they keep their position in a foreign military for more than six months after being instructed to resign.

Providing other (non-military) services to a foreign state can sometimes also lead to the loss of citizenship. Depending on the country, such measures can be imposed for holding a foreign elected office, working for certain foreign state agencies, or even accepting a civil service position in another country in general. The loss provision is applicable to all citizens in 45 countries, while in 30 countries, it only applies to certain groups of citizens, typically those who acquired citizenship by naturalisation. Just as with military service, the provisions often state that you can only be stripped of your citizenship if a warning has been issued first that you must resign from your position, and you subsequently fail to comply.

## Disloyalty, state security, or other offences

Citizens can have their status revoked for acts seen as disloyal to the state or acts that threaten national security or a country's constitutional order in many countries globally. This includes crimes like treason, espionage, or attempting to overthrow a country's government. Joining a terrorist organisation is also a common example of the kind of conduct that can trigger the revocation of citizenship. The provision is applicable to all groups of citizens in 43 countries, while in 89 countries it is restricted to certain groups of citizens (usually citizens by naturalisation). For example, if you are a Belgian national and you acquired your citizenship other than by birth, you can be deprived of your citizenship if you violated your duties as a national or if you have been convict-

ed for committing a serious crime against Belgium, as long as this would not make you stateless.

Citizens can only lose their citizenship if a court has convicted them of a crime against the security of the state or a crime against the interests of the state in a large share of countries. In other states, harming state security or state interests can be sufficient reason for loss of citizenship even without a prior conviction. In some cases, it is specified which acts can lead to citizenship stripping, such as in Germany, where you can lose your citizenship if you have been actively fighting for a terrorist militia abroad. However, in most cases, the provisions are broad and rather ambiguous, referring to acts as "serious crimes against the country" (Bulgaria) or acts that "harm the country's prestige" (Vietnam). These provisions tend to be particularly broad in scope if only naturalised citizens are affected.

You can lose your citizenship due to criminal offences in 79 countries. Usually, this will be the case for those persons who are convicted of a serious crime. In many of these countries, a person can only be stripped of their citizenship if they have been sentenced to imprisonment for a certain period, ranging from twelve months to ten years. This loss provision is applicable to all citizens in four countries, while it is restricted to certain groups of citizens (usually citizens by naturalisation) in 75 countries. In the countries where the provision is applicable only to naturalised citizens, the crime must usually have been committed within a certain time period after citizenship was acquired (e.g. five or ten years). Once this period has passed, a criminal conviction can no longer undermine one's citizenship.

## Citizenship stripping: A violation of international standards?

Security-related deprivation of citizenship creates a risk of arbitrary deprivation of citizenship, which is generally considered to be contrary to international customary law. An analysis of the GLOBALCIT data raises concerns about the possibility of citizenship stripping without due process, particularly in cases where the procedure is a lapse rather than by an act of deprivation. The broad and ambiguous wordings of many provisions may also give way to citizenship stripping without a legitimate purpose or disproportionate effects. Contrary to international standards as outlined in the [Principles on Deprivation of Nationality as a National Security Measure](#), many states' loss provisions do not provide for adequate safeguards against statelessness. This can

result in an extremely precarious situation for the affected persons and their dependents.

Citizenship stripping provisions often target specific groups – typically individuals who were not born as citizens – resulting in discriminatory treatment. This selective application effectively creates a hierarchy of citizenship, where naturalised citizens are subjected to greater insecurity compared to citizens by birth. Such discriminatory treatment remains widespread; provisions for loss of citizenship due to disloyalty only apply to certain groups of citizens in 47% of countries. Dual nationals face an additional form of discrimination in countries where revocation provisions apply exclusively to them. While this limitation is intended to prevent statelessness, it also means that only a segment of citizens – predominantly with a migration background – is exposed to the risk of citizenship deprivation. Moreover, the dataset also makes clear that in several countries, renouncing citizenship is either legally prohibited or practically unfeasible. For individuals who hold dual nationality involuntarily, this imposed status may become a liability, as it increases their vulnerability to citizenship stripping.

The Dutch citizenship stripping provisions have been criticised for this reason, as they only affect dual citizens. A recent Amsterdam District Court case illustrates this perfectly. The case concerned three persons who were convicted of similar (terrorism-related) crimes: a Dutch citizen without any other nationality, a Dutch-Turkish citizen, and a Dutch-Moroccan citizen. After the three had served their sentences, the Dutch authorities revoked the citizenship of the latter two. The person with only Dutch citizenship could not be

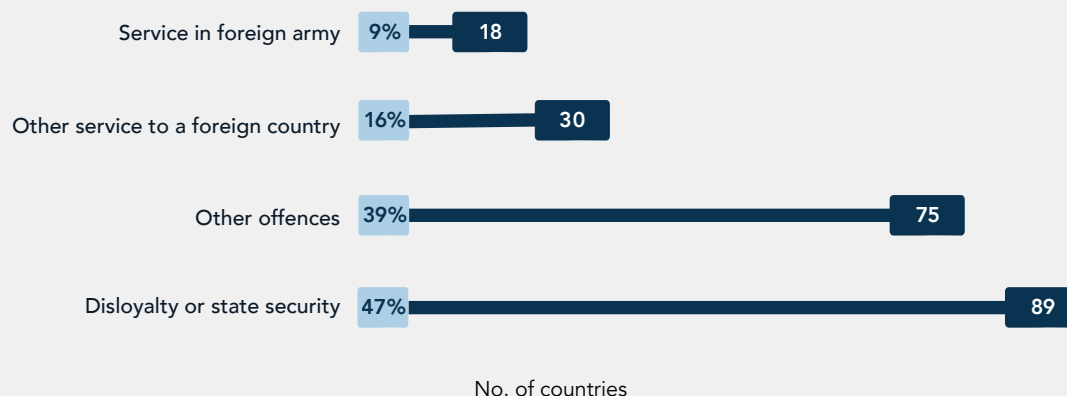
stripped of his citizenship, as he only had Dutch citizenship. The Dutch-Turkish citizen stated during the court hearings that he intended to renounce his Turkish citizenship in an attempt to make the loss of Dutch citizenship impossible. Finally, the Dutch-Moroccan citizen would be unable to do this, as Moroccan authorities rarely allow their citizens to renounce their citizenship. The court ruled that the distinction between mono-nationals and dual nationals amounted to a violation of the prohibition of discrimination based on ethnic origin. For that reason, the Dutch government could not revoke the citizenship of a person convicted of terrorism-related crimes. The Dutch government has announced that it will appeal the decision.

## Recent changes

Countries regularly adapt citizenship stripping provisions in response to perceived threats and shifting political or security contexts. A notable example is Latvia, where citizenship can be revoked if an individual serves in the armed forces or security services of a foreign state. In 2022, however, an exception was introduced to permit Latvian citizens to work with Ukrainian military forces or governmental institutions without risking loss of citizenship. This illustrates how citizenship revocation policies can evolve in response to international developments. Similarly, references to terrorism have increasingly appeared in citizenship stripping provisions, particularly across Europe. A new study shows that prior to 2001, such references were virtually absent; by 2022, however, over one-third of all European citizenship revocation provisions explicitly mentioned terrorism-related grounds,

### 4.3 DISCRIMINATION BY CITIZEN CATEGORIES, IN SELECTED MODES OF CITIZENSHIP DEPRIVATION

Share of countries with discriminatory provision in citizenship law | 191 countries | 2024



Source: GLOBALCIT Citizenship Law Dataset, v3 | modes L03-L04, L07-L08

including acts of terrorism and affiliation with terrorist organisations.

A troubling development is the strategic use of citizenship deprivation by authoritarian regimes to suppress political dissent and tighten control. In 2023, Nicaragua initiated a process to amend its constitution in order to enable the revocation of citizenship for individuals deemed “traitors to the homeland.” Despite the fact that the amendment only formally came into force in 2025, more than 200 individuals – primarily political dissidents – lost their citizenship on this ground, and many of them were made stateless. In 2024, Kuwait introduced sweeping amendments that allow for citizenship loss in cases of fraudulent conduct, crimes involving “moral turpitude”, or where the state’s interests or security are deemed at risk. Kuwaiti nationality law also restricts dual citizenship and permits revocation if an individual acquires or retains foreign citizenship upon naturalisation. Within a six-month period, roughly 42 thousand people reportedly lost their citizenship under these provisions. The crackdown occurred during a suspension of parliament and is reported to restrict certain groups’ access to political rights and Kuwait’s welfare state benefits.

Many citizenship stripping laws are framed in ambiguous and broad terms, citing “acts against the interests of the state” or conduct perceived as showing “disloyalty or disaffection,” without clearly defining their scope. This ambiguity fosters significant legal uncertainty and enables states to intensify enforcement or reinterpret the application of these laws without needing to amend legislation, which makes it more difficult to monitor developments.

Instrumentalising citizenship policies for presumed security purposes can lead to highly questionable outcomes that frequently contradict the international legal obligations of states as well as international standards. By closely monitoring developments of these provisions, the GLOBALCIT data provides a tool for researchers interested in analysing global trends and regional variation. In addition, our data on global patterns and trends over time can inform public advocacy addressing the pervasive concerns about states’ adherence to international standards.

## Principles on Deprivation of Nationality as a National Security Measure

### When and by whom were the principles adopted?

The [Principles on Deprivation of Nationality as a National Security Measure](#) were developed over a 30-month research and consultation period, with input from more than 60 leading experts in the fields of human rights, nationality and statelessness, counter-terrorism, refugee protection, child rights, migration and other related areas. The principles restate or reflect international law and legal standards under the UN Charter, treaty law, customary international law, general principles of law, judicial decisions and legal scholarship, regional and national law and practice. They articulate the international legal obligations of states and apply to all situations in which states take or consider taking steps to deprive a person of nationality as a national security measure.

### What are the main principles?

The principles establish a basic rule (Rule 4) that states should not deprive persons of nationality for the purpose of safeguarding national security (4.1). If a state deviates from that rule, the legal grounds for citizenship stripping should be interpreted and applied narrowly. States should only apply these if there is 1) a lawful conviction that meets international fair trial standards, and 2) if the person has conducted themselves in a manner seriously prejudicial to the vital interests of the state (4.2).

The principles also affirm that this narrow exception is further limited by other standards of international law, including the obligation to avoid statelessness and the prohibition of discrimination (4.3).

An extensive Commentary on the Principles on Deprivation of Nationality as a National Security Measure can be found [here](#).

### Why do these principles matter?

This section highlights that the use of citizenship revocation on security grounds has grown in recent years, especially in Europe. The Principles on Deprivation of Nationality as a National Security Measure were developed in response to this troubling trend. The principles do not introduce new standards; they reaffirm the existing as well as international legal framework that all states are already bound to follow when taking such measures. Yet, as shown in this section, many states are falling short of their obligations. Therefore, the principles serve as a clear reminder that international law demands that every person's right to a nationality must be respected, protected, and upheld.

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List of references hyperlinked in the text, by section of the report. References are listed in the order in which they appear in the text.

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