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**Dual Citizenship in Europe:  
Drivers, Determinants and Impacts  
on Immigrant Integration**

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## ABSTRACT

This paper focuses on the formation and evolution of dual citizenship policies in European countries, examining the underlying economic, social, political, and legal driving factors. It further analyzes how these policies affect the economic and social integration of immigrants. By selecting France, Sweden, Germany, and Austria—four countries representing contrasting policy approaches—as comparative case studies, the research draws on policy documents, statistical data, and academic literature. Employing a qualitative comparative method, it reveals the internal logic and outcomes of institutional development in different national contexts. The findings show that adjustments in dual citizenship policies are driven not only by labor market demands and globalization, but also by national identity, political ideology, and institutional path dependency. The openness or restrictiveness of these policies has a direct impact on immigrants' employment, income, social participation, and cultural identification. The paper concludes with several policy recommendations aimed at finding a balance between promoting integration and safeguarding national interests, while also contributing to policy coordination in the broader context of European integration.

**Keywords:** dual citizenship, immigrant integration, citizenship policy, Europe, Germany, France, Sweden, Austria, comparative analysis

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## Section I. Introduction

In a world that is more closely interconnected, cross-border immigration is becoming increasingly common. Dual nationality has become a key issue for modern governments and sometimes a controversial one. Countries are now confronted with complex challenges related to identity, sovereignty and social cohesion. Historically, many countries have supported xenophobic citizenship as a way to ensure political loyalty and strengthen national unity. But in fact, more immigrants tend to retain their original places of origin while adapting to life in a new country. For them, dual nationality offers both legal benefits and a way to maintain emotional and cultural connections. This transformation has led many governments to reconsider the principles they have long adhered to. They are now seeking new ways to balance national interests with the demands of inclusiveness and integration.

European countries show obvious differences in dealing with the issue of dual nationality. France and Sweden were early adopters of more liberal policies. They believe that dual nationality is not a risk but a tool to help immigrants settle down, support social stability and participate in democratic life. In contrast, Germany and Austria have adopted a stricter model. Citizenship is closely related to loyalty to the country and the expectation of complete cultural assimilation. It was not until recent years that these countries began to shift to more flexible policies cautiously and gradually. These divergent policy paths stem not only from different history, legal frameworks and political cultures, but also from deeper institutional thinking on how to deal with conflicts of interest in relation to dual nationality. This study aims to reveal the forces behind the formation and evolution of dual nationality policies in European countries. It pays particular attention to the economic, social, political and legal dynamics at play. In addition, it also carefully studied how these policy choices ultimately affect the way immigrants integrate into the new society. More specifically, this research has addressed two core issues. First of all, what has driven or hindered European countries from accepting dual citizenship? Secondly, under different policy frameworks, how do immigrants perform in terms of employment, income levels, community participation and sense of identity? By addressing these questions, this thesis seeks to illuminate the role and challenges of dual citizenship in the current context of European governance, and to provide theoretical and policy insights for future reforms and coordination efforts.

Methodologically, this research adopts a qualitative comparative approach, selecting four countries—France, Sweden, Germany, and Austria—that represent contrasting models of dual citizenship regulation. France and Sweden exemplify more inclusive frameworks, while Germany and Austria have historically pursued more restrictive approaches. Drawing on policy documents, legal texts, official statistics, and existing academic literature, this study analyzes both macro-institutional structures and micro-level practices. It also engages with theoretical frameworks related to immigrant integration and policy change, in order to enhance explanatory depth and contribute to the broader academic debate.

The structure of the thesis is as follows: section II reviews the relevant theoretical approaches and existing scholarship, focusing on citizenship, integration, and policy development. section III provides a historical and contextual overview of European migration patterns and the evolution of dual citizenship regimes. The fourth part delves deeply into the major economic, social and political forces behind the transformation of the dual nationality policy. In the fifth part, the focus shifts to how these policies affect immigrant integration, examining outcomes such as employment prospects, income, civic participation, and identity formation. Section V compares four case studies illustrating differences in methodology and impact of policy design. Section VI explores how the drivers interact and considers what this means for policy coordination at the EU level. Finally, section VII summarizes the main ideas of the study and a number of policy recommendations. Just as Baubock (2006) pointed out, the transformation of the European citizenship system reflects the broader changes in how countries manage immigration, rights and political participation.

## **Section II. Theoretical Framework and Literature Review**

Understanding citizenship's legal and social underpinnings is necessary to comprehend how the dual nationality healthcare system has evolved in Europe. Citizenship has traditionally been seen as a one-time legal pact between the individual and the state as a sign of political loyalty and civic responsibility (Vink & De Groot, 2010). Some nations reject the idea of twin status by the second citizenship theory. The expanding cross-border flows and international connectivity significantly hamper this model. The concept of transnational citizenship was first introduced by scholars like Baubock (2010), who noted that many contemporary immigrants have social and legal ties to multiple nations. In addition, Soysal (1994) emphasized the rise of post-state citizenship, where rights are more based on international human rights standards than racial or national identity. Bloemraad et cetera. The need for rights-based inclusivity and cultural assimilation is incorporated by today's citizens, according to (2008), creating a mixed membership model.

From the perspective of the theory of immigration integration, citizenship is not merely a legal status; It is also a key mechanism for economic, social and cultural inclusion (Castles & Miller, 2009). In terms of the economy, dual nationality can improve immigrants' access to employment opportunities and welfare, thereby enhancing their competitiveness in the labor market (Koopmans & Statham, 2000). In terms of society and culture, it helps reduce identity anxiety by allowing immigrants to actively integrate into the host country's society while retaining their country of origin relations (Howard, 2009). This dual sense of belonging is widely regarded as a condition for promoting social stability and democratic participation (Bloemraad, 2004).

To explain the divergence in policy choices among European countries, policy change theories offer important analytical tools. Path dependency theory emphasizes the enduring influence of historical institutional legacies, such as France's early acceptance

of dual nationality in the 1970s, in contrast to Germany's relatively late and limited policy adjustments in the early 2000s (Howard, 2009). Policy feedback theory suggests that previous policy arrangements generate social and political consequences that may, in turn, shape future reforms. Building on this, In some cases, positive impacts of dual citizenship on integration outcomes have encouraged gradual liberalization (Vink & De Groot, 2010). This observation is further corroborated by Huddleston (2020), whose comparative analysis across six European countries demonstrates that both origin country dual nationality rules and destination country procedures significantly influence immigrants' interest in and ability to naturalize. Multilevel governance theory adds a supranational dimension, positing that although nationality remains a national competence, EU-level legal norms and political expectations increasingly shape the policy space available to member states (Bauböck, 2010). Hooghe and Marks (2001) define the EU as a multilevel system where authority is shared across levels, allowing supranational influence even in nationally reserved domains.

The existing literature further identifies a complex interplay of economic, social, and political ideational factors behind the reform of dual citizenship policies. Economic considerations include labor market needs, demographic aging, and migrants' long-term investment intentions (OECD, 2022). Social and cultural factors involve the societal acceptance of plural identities, levels of civic participation, and diverging conceptions of national belonging (Favell, 2008). On the political side, the recent surge of right-wing populism in many European countries has fueled a more restrictive turn in citizenship debates, with some parties framing dual citizenship as a threat to national identity (Yogo, 2025). Shachar (2009) conceptualizes citizenship as a mechanism of global stratification, where access to dual nationality reflects both inherited privilege and strategic state interests. Overall, dual citizenship cannot be understood merely as a legal-technical arrangement, but rather as a reflection of how states reconcile national interests, social diversity, and global interdependence.

## **Section III. Migration Patterns and the Evolution of Dual Citizenship Policies**

### **3.1 Shifting Migration Dynamics in Europe**

Over the past decades, Europe has emerged as one of the world's primary destinations for international migration. Driven by the end of the Cold War, the deepening of European integration, and broader processes of globalization, the demographic and social structures of many European countries have undergone profound transformations. Particularly following the EU enlargements of 2004 and 2007, intra-European mobility increased significantly, while at the same time, Western Europe experienced sustained inflows of immigrants from non-EU countries. These trends have made society more diverse. The country has to rethink the boundary between belonging and identity.

At present, immigrants entering Europe can be roughly divided into two categories. The first category is mobility within the EU. For example, people from eastern European member countries go to Germany, France or Sweden. This flow is growing rapidly. The policy of free movement has played a driving role. The second category is large-scale immigrants from outside the EU. These people mainly come from the Middle East, North Africa, South Asia and sub-Saharan Africa. They brought different cultural backgrounds and religious beliefs.

These two types of migration flows have brought multifaceted challenges to the receiving countries. For example, the integration of the labor market is no longer simple. At the same time, the definition of citizenship and national identity are also facing new pressures.

### **3.2 Divergent National Approaches to Dual Citizenship**

In order to cope with the changes in population and social structure, European countries have adopted different approaches in their nationality policies. Some countries responded earlier. Such as France and Sweden. They accepted the legitimacy of dual nationality earlier. This identity is regarded as a tool to promote the integration of immigrants. It can also encourage long-term settlement and allow more people to participate in public affairs. The naturalization systems in these countries are relatively loose. There are almost no restrictions on the reservation of original nationality.

By contrast, Germany and Austria have traditionally upheld more exclusive understandings of citizenship, linking nationality with loyalty and cultural conformity. Therefore, these countries have always refused to accept dual nationality. It was not until recent years that they recognized the changing reality and gradually implemented some reforms. Spiro (2010) criticized this restrictive tradition, arguing that in an interconnected world, dual nationality should increasingly be regarded as a normative human right.

Historically, dual nationality has been regarded as an exception rather than the norm in most European countries. As observed by Vink & De Groot (2010), before 2000, most European countries required naturalized immigrants to give up their previous citizenship. However, a turning point emerged at the beginning of the 21st century. The increase of the second-generation immigrant population, the growing contribution of immigrants to the economic and social systems, and the challenges of an aging population have increasingly weakened the sustainability of the restrictive nationality system. Crul and Schneider (2010) emphasized that more and more second-generation youth in European cities challenged the national citizenship model and pushed the pressure for more inclusive policies. According to the data of OECD (2022), the number of countries that accept dual nationality has almost doubled in the past 20 years-this change is driven by pragmatic considerations and a gradual understanding of multicultural reality.

### **3.3 Supranational Influences and Institutional Convergence**

At the supranational level, although nationality is still an area of national sovereignty, EU norms have exerted subtle but meaningful influence. The principles of free movement, equal treatment and non-discrimination are written into EU laws and strengthened by the Charter of Fundamental Rights, which indirectly affect the attitude of member States towards citizenship. In addition, the EU directive on family reunion and long-term residence provides immigrants with a legal way to obtain a more stable status, which in turn affects the decisions of countries on naturalization. The developing jurisprudence of the European Court of Justice has also begun to touch on all aspects of nationality policy, thus promoting member States to strengthen coordination, even if there is no direct coordination.

The changes in the dual nationality policy in Europe reflect the changes in immigration patterns and the increasingly complex situation. The demand for integration in various countries is also increasing. Many countries have got rid of strict nationality regulations. They began to adopt more flexible and inclusive ways of identity management. It is precisely in this environment where population reality changes and institutional adjustments are intertwined that this article continues to explore the driving forces behind the adoption of dual nationality policies by various countries. Meanwhile, the actual impact of these policies on the outcome of immigration integration is also evaluated.

## **Section IV. Driving Mechanisms Behind Dual Citizenship Policies**

This section focuses on four representative European countries - France, Sweden, Germany and Austria - which reflect different practices of dual nationality. France and Sweden have free and inclusive political systems, while Germany and Austria maintain stricter policies rooted in sovereignty and the principle of a single nation. These countries are selected according to their demographic significance, different historical experiences of immigration and naturalization, and changes in integration policy models, as reflected by indicators such as MIPEx. Their participation makes it possible to conduct multi-dimensional comparisons of the legal, political and social dimensions of dual citizenship governance in Europe.

The previous section examines the evolution of European immigration patterns and dual citizenship policies. It emphasizes the gradual transformation from an exclusive nationality system to a more inclusive identity management system. However, the speed and direction of these policy changes vary greatly among countries. This section discusses the potential dynamic factors of this difference, focusing on how social, cultural and institutional forces interact to shape the development of dual nationality framework in different European contexts.

### **4.1 Economic Incentives and Labor Market Logic**

On the economic front, many European countries have adjusted their dual nationality policies to adapt to changes in the labor market. The birth rate continues to decline, and the problem of population aging is becoming increasingly serious. Relying solely on the country's population structure has become difficult to maintain economic growth. Germany and Austria are typical examples. They are increasingly relying on skilled immigrants to support the labor force and welfare system. In 2023, Germany passed the Nationality Modernization Act. This act relaxed the requirements for naturalization. Residents of non-EU countries can now retain their original nationality. The German government pointed out that this reform is mainly aimed at attracting and retaining professional and technical talents. Key industries include information technology, healthcare and engineering, etc. This represents a change in policy direction. Shift from control to motivation. This transformation is driven by practical economic considerations. The research also provides data support. Gathmann and Keller (2018) found that previous naturalization reforms in Germany significantly improved the performance of immigrants in the labor market. This indicates that inclusive nationality policies may bring about actual economic benefits.

Portugal's long-term "golden visa" policy also shows that nationality policy can serve economic goals. Although the policy has little to do with dual nationality, it does lower the threshold of naturalization. This reflects that the country is more flexible in using legal identity, aiming at attracting foreign investment and promoting economic development.

The reports of OECD and European Migration Network (EMN) confirm that dual citizenship significantly increases the willingness of immigrants to settle down and participate in the labor market. Highly skilled immigrants usually maintain family, economic or emotional ties with their countries of origin. Requiring them to give up their original nationality has created obstacles for their long-term integration into society. On the contrary, allowing dual citizenship can promote inclusion, economic stability and upward mobility. This correlation is supported by Dronkers and Vink (2012), who proved that in European countries, easier access to citizenship is related to higher naturalization rate and stronger labor market participation. On this basis, Vink, Prokic-Breuer and Dronkers (2013) emphasized that institutional design plays a crucial role: when the acquisition procedure is transparent and symbolic and inclusive, immigrants are more likely to be naturalized. Recently, Peters and Vink (2024) have provided further quantitative evidence indicating that easing the abandonment rule has significantly promoted the absorption of naturalization in multiple EU countries.

Furthermore, dual citizens often maintain strong economic links to their countries of origin. Remittances and diaspora investments are vital tools of development. In 2021, total remittances from Europe to developing countries exceeded €150 billion. France and Spain, which have large diasporas, view dual nationality not as a threat but as a diplomatic and economic asset, encouraging transnational ties and leveraging global influence. As Gamlen (2014) explains, states increasingly institutionalize dual citizenship as a strategic tool to manage their diasporas and harness remittances, investments, and symbolic capital.

## **4.2 Social Identity and Multicultural Challenges**

Social and cultural considerations also play a key role in legitimizing dual citizenship. In increasingly multicultural societies, national identity is no longer singular or static. Many migrants, particularly second and third generations, experience dual belonging. Forcing them to choose one identity instead of another will lead to psychological pressure and social alienation.

In this regard, countries such as Sweden and France have adopted dual nationality as a means to enhance inclusiveness. In France, the long-standing tradition of personal law and the values of civil republicanism support the relatively free civil system. Dual nationality is regarded not only as a right, but also as a way to affirm individual freedom and diversity. Sweden, in turn, regards dual citizenship as a tool to promote integration. The government regards naturalization - not giving up the original nationality - as a way to cultivate citizens' sense of responsibility and stability.

European countries have different opinions on this. In Austria and the Netherlands, some political parties still insist that nationality must reflect complete loyalty. They believe that dual nationality weakens social cohesion and also makes integration more complicated. In addition, it may also bring potential safety hazards. In recent years, the rise of populism and right-wing parties has strengthened this claim. They depict dual nationality as a threat to national identity. In Sweden, Odmalm (2011) pointed out that right-wing parties construct immigration and citizenship through the discourse of "security" and "loyalty".

Therefore, cultural diversity has promoted policy liberalization in some countries. But in some other countries, it has instead brought more restrictions. This indicates that whether the dual nationality policy can effectively promote integration largely depends on the overall consensus of society on diversity and a sense of belonging.

## **4.3 Political Institutions and Path Dependency**

How a country views dual nationality is largely influenced by its political stance and institutional structure. Generally speaking, leftists or liberals are more inclined to support inclusive citizenship policies. In contrast, right-wing or nationalist parties are more inclined to adopt a restrictive and exclusive position.

Germany's reforms in 2023 reflect a political shift that has been driven by the priorities of the Progressive Alliance and the long-standing resistance of the conservatives. By contrast, Austria shows the opposite trend. The Liberal Party (FPÖ) has repeatedly opposed the relaxation of the dual nationality law, citing concerns over loyalty, unity and loyalty division.

Furthermore, institutional path dependence is a must. Germany adhered to the strict bloodline doctrine until 2000, while France accepted two citizenships through an empty

naturalization program. These institutional reputations have hindered rapid policy transformation and contributed to inertia in reform processes.

At the supranational level, the European Union does not directly manage nationality, and this remains a matter of national sovereignty. However, EU principles, such as freedom of movement, non-discrimination and the rights of long-term residents, have indirectly influenced the country's citizenship policy. The instructions on family reunion and long-term residence make people expect legal security and integration, which makes it more and more difficult to prove the rationality of restrictive nationality law.

The European Court of Justice (CJEU) is also involved in cases related to nationality and has gradually expanded its scope of supervision when national laws conflict with the fundamental principles of the European Union. Although this influence is still limited, it has pushed member States to adopt a more consistent approach to nationality laws, especially in areas that affect EU citizens and their families.

#### **4.4 Interactions Among Factors and Summary of Policy Dynamics**

The changes in the dual nationality policy in Europe cannot be explained by a single reason. On the contrary, it was formed under the convergence of multiple factors such as economic demands, cultural concepts, political positions and institutional traditions.

These factors often interact with each other, sometimes enhancing each other's influence and sometimes checking and balancing each other. Even in the face of similar external pressure, the legislation lines adopted by various countries may change entirely. Germany and Austria are confronted with the issues of an aging population and labor shortages, which have put stress on attracting skilled immigrants. But, changes are frequently postponed due to political resistance or public suspicion. In Germany, population concerns were visible much earlier, but it was not until 2023 that a center-kept coalition pushed for true legislative reform. Similar pressure is being put on Austria, primarily due to republican opposition, to avoid liberalization. These issues are greatly intertwined with how cultures perceive personality, owed, and inclusion politically and demographically.

Social personality can be defined in two ways. Multiculturalism has led some states to evaluate strict citizenship regulations, and nationalist identity politics does cause a reaction. The argument over loyalty and connectivity frequently transcends populations. The loss of violence or integration you rekindle, calling for stricter rules, even in a free society like the Netherlands.

Institutional heritage affects the ease with which a country adjusts its nationality laws. Based on the republican tradition, France has hardly questioned dual nationality. Germany has long adhered to bloodline doctrine and only recently moved towards inclusiveness. Path dependence slows down the reform, even when conditions are favorable.

At the EU level, supranational norms have added another layer of influence. Although nationality remains a sovereignty issue, EU principles such as free movement, equal treatment and non-discrimination have created soft pressure for convergence. In the fields of family reunion, long-term residence and anti-discrimination, EU directives have gradually raised expectations on how inclusive the citizen policies of member States should be. Furthermore, the ruling of the European Court of Justice has extended these expectations to the interpretation of rights related to nationality, especially in cross-border cases.

When all these factors are considered together, the dual nationality policy seems to be more like a dynamic field formed by trade-offs, rather than a fixed institutional choice. Just as Sejersen (2008) pointed out, the rise of the dual nationality system reflects how countries reconfigure their national identities and loyalty to cope with the pressure of cross-border migration and the reality of globalization. Economic logic may advocate openness; Political actors weigh the risks faced by national identity; Social actors either promote inclusion or restriction; The legal framework limits the available options. Final policies show how each country balances these pressures.

In conclusion, the evolution of the dual nationality policy in Europe has undergone a complex and often contradictory process. When aligned with social and political demands, reforms advance; but they often stall under the weight of nationalism or historical constraints.

## **Section V: Comparative Analysis of Dual Citizenship Policies**

This section selects France, Sweden, Germany and Austria as cases for systematic comparative analysis. The selection of these four countries is based on several key considerations:

Firstly, These countries have different positions on the dual nationality policy in Europe. Germany, particularly Austria, adheres to stringent rules, while France and Sweden are pardoned. Austria continues to be one of the nations with the utmost limits. More powerful administrative implications and validity are revealed compared to these conflicting circumstances. Next, these countries have recognized demographic characteristics. Germany and France are the two locations in Western Europe that have the most immigrants. The higher proportion of immigrants from Northern Europe demonstrates the presence of Scandinavians in Sweden.

The impact of philosophy and functional rigidity on social policies contrasts Austria's traditional position. These countries' strong legal techniques and visible common knowledge improve analytical study's practicality and cost-effectiveness, enabling policy tracking, legal interpretation, and results analysis. Each nation's legal framework, economic outcomes, and social integration are examined in this regard.

Understanding how various factors affect plan decisions connects each to the social setting and the national model.

## **5.1 Case Study Comparison: Liberal vs. Restrictive Policy Paths**

Dual nationality policies in Europe differ widely, shaped by law, politics, history, and public opinion. This section analyzes France, Sweden, Germany, and Austria to uncover their institutional logic.

### **France: Republican Tradition and Historical Continuity**

France was among the first in Europe to accept dual nationality and remains notably lenient. Its Civil Code allows multiple nationalities without renunciation, reflecting a republican tradition that defines citizenship by equality, not ethnicity. Furthermore The colonial relations in France shaped its inclusive stance towards dual nationality. North African immigrants often benefit from flexible naturalization aimed at maintaining historical and economic ties. In this context, Dual citizenship is seen as a tool for immigrant integration. It promotes voter participation and encourages permanent arrangement. According to data from the French National Bureau of Statistics, about 15 % of new European citizens have enlisted in trade unions or taken part in local public office elections in recent years. This level of participation strengthened their engagement with the European social structure. Additionally, it turns the issue of dual nationality into political participation.

### **Sweden: Policy Innovation and Social Inclusiveness**

Sweden officially recognized dual citizenship in 2001. Among the Nordic countries, it is one of the most progressive countries in this field. This reform reflects Sweden's adjustment to an increasingly multicultural society and is consistent with Sweden's broader social democratic approach to immigration. The Swedish authorities believe that keeping immigrants' original nationality can build trust and enhance their sense of belonging. It also helps to relieve identity-related stress and supports social cohesion.

The naturalization process in Sweden is relatively simple. The requirements for residence and language are very low, and the legal framework is also very flexible. The country also places great emphasis on the equal participation of young immigrants. The second-generation immigrants are encouraged to maintain connections with both cultures. The participation rate of immigrants in education, public sector jobs and elections is significantly higher than the European average. These achievements have made Sweden a successful model of social integration.

### **Germany: Institutional Transition and Political Tensions**

Germany has long upheld a restrictive stance on dual nationality. It was not until the year 2000 that the German Nationality Act was first reformed to allow foreign-born children of immigrants to hold dual citizenship until the age of majority, at which point they were required to choose one nationality. This “option model” (Optionspflicht) was heavily criticized for exacerbating identity uncertainty among second-generation migrants and for generating discriminatory practices in implementation.

In 2023, Germany adopted the Nationality Modernization Act, marking a significant transformation in its dual citizenship policy. As Gesley (2023) pointed out, the reform has removed the abandonment requirement and lowered the residence threshold to five years - even three years for well-integrated applicants. These provisions were formally promulgated by the German Parliament in January 2024 (Associated Press, 2024). This legislation enables naturalized citizens to retain their original nationality while simplifying naturalization channels. This change not only reflects the pressure of population and labor market, but also reflects political changes. Progressive parties such as the Green Party and the Social Democratic Party have always advocated inclusive ethnic policies, while conservative forces give priority to ethnic loyalty and cultural cohesion. Therefore, the reform has triggered a fierce political debate and social polarization. Despite the legislative breakthrough, the public's expectation of loyalty is still worrying, and the long-term stability of the new legal framework is still uncertain.

#### Austria: Institutional Continuity of Nationalism

Austria is one of the most restrictive countries in Europe regarding dual citizenship. With few exceptions—such as refugees or individuals with historical ties to the country—naturalization requires relinquishing one's previous nationality. This legal rigidity reflects a political tradition that values national cohesion and cultural unity. As Joppke (2013) argues, this defense is often expressed in loyalty oaths and citizenship tests, both of which are more cultural control mechanisms than tools of integration in liberal democracies.

Despite the pressure for reform brought about by an aging population and labor shortages, Austria's calling for transformation has been constantly blocked by the strong tale of the republican parties. Wiesbrock (2011) compared Sweden's inclusive approach to Austria's exclusive citizenship system, demonstrating how often political narratives (as opposed to economic needs) influence reforms ' scope. In public discourse, dual nationality is usually depicted as a risk to national loyalty and public security. For example, the issue of dual citizenship of Turkish residents in Austria has repeatedly caused controversy, and some political groups even proposed to investigate and revoke the hidden dual citizenship. This political climate has strengthened the institutional rigidity of the country and highlighted the strong inertia of its restrictive citizenship system. Joppke (2007) holds that in many European countries, citizenship is still regarded as a symbolic boundary of national identity. When cultural exclusivity dominates politics, reforms tend to stagnate.

**Table 1 – Comparison of Dual Citizenship Policies across Four European Countries**

Country	Policy Orientation	Key Reform Milestones	Legal Characteristics	Socio-Cultural Features
France	Liberal	Stable since post-WWII	Recognizes dual nationality, no renunciation required	Republican tradition, colonial legacy, inclusive
Sweden	Liberal	Recognized in 2001	Flexible naturalization laws, low thresholds	Multicultural values, strong equality policies
Germany	Gradual Opening	Reforms in 2000 and 2023	Option model abolished, original nationality allowed	Loyalty discourse, partisan divisions
Austria	Highly Restrictive	No major reforms	Renunciation required, rare exceptions	National unity and exclusivity emphasized

Source: Own elaboration based on national legislation, academic literature (e.g., Bauböck, 2010; Shaw, 2010), and MIPEX 2020 indicators. <https://www.mipex.eu/>

## 5.2 Multi-Dimensional Policy Comparison

To truly grasp the meaning of dual citizenship in Europe, we must go beyond the legal text and deeply study how these policies play a role in practice. This section compares France, Sweden, Germany and Austria from three dimensions: legal framework, economic achievements and social integration, revealing how the practices of each country reflect deeper institutional logic and national values.

Legally, Nationality in France reflects democratic principles of equality, and refugees may accept multiple identities while maintaining their original citizenship. Sweden's 2001 changes coincide with its cultural and social democratic values. With few residency requirements and few language requirements, naturalization is easy. These authorized frameworks promote cooperation and adopt a welcoming attitude.

Unlike France and Sweden, Germany and Austria long upheld single citizenship, viewing it as essential to national identity. Germany introduced minimal transformation 2000 with the "option model," allowing children of immigrants born on European soil to hold dual nationality periodically. When they grow up, they may choose their citizenship. Although the legislation was novel at the time, some young people were put under pressure and doubt. A more flexible approach emerged in 2023. To make naturalization simpler, Germany eliminated the requirement to abandon one's particular citizenship. Austria is still very powerful, though. In some situations, it also abides by the principle of one citizenship. This reflects a political culture that favors national unity over range.

Economically, dual nationality has an impact on both the labor market and entrepreneurship. In France and Sweden, open policies have made immigrants more motivated to make long-term plans. People with dual nationality tend to exhibit higher mobility, clearer career goals, and greater participation in cross-border business. In France, immigrant businesses often use dual nationality to connect the markets of their

home countries with those of their host countries. Sweden has the highest rate of self-employment among naturalized immigrants in Europe, partly due to its policy environment that supports dual citizenship (MIPEx, 2020).

This pattern has been confirmed by empirical research. According to Gathmann and Keller (2018), dual nationality promotes long-term economic integration, which is facilitated by stable employment and increased mobility. The European Commission (2021) also pointed out that countries that allow dual nationality have more advantages in attracting and retaining technical talents, especially in fields such as science and technology, healthcare, and engineering..

By providing regional economic participation and maintaining global mobility, two memberships lower immigration challenges. This position opens up new markets for funding, remittance, and international business and strengthens the diaspora network. In more inclusive European countries, the employment rate of immigrants is higher. This reflects the advantages of a stable and supportive policy environment (OECD, 2022).

By contrast, restrictive frameworks can inhibit economic momentum. Germany's now-abandoned Optionspflichtmodell (option model) left many second-generation immigrants in legal limbo, discouraging long-term planning and investment. In Austria, high naturalization thresholds mean that many migrants remain in legally and economically precarious positions, often resulting in underemployment or recourse to the informal economy. The overall message is clear: where the law signals belonging, migrants invest; where it excludes, they hesitate.

Socially, dual citizenship also shapes how migrants see themselves—and how society sees them. In France and Sweden, inclusive access to nationality has been linked to higher rates of civic participation, particularly among second-generation immigrants. In Sweden, dual nationals are increasingly active in youth councils, local politics, and civil society organizations. In France, the acquisition of nationality is closely associated with internalization of republican values, which in turn fosters engagement in public life. These social effects are corroborated by empirical studies. Hainmueller & Hangartner (2013) show that naturalization significantly increases political participation among immigrants, especially in democratic contexts with inclusive integration regimes.

These cross-national differences in the legal, economic, and social dimensions of dual citizenship are also mirrored in broader integration policy frameworks. The following table presents MIPEx scores for each of the four countries, offering a quantitative overview of their respective approaches to access to nationality and immigrant integration.

**Table 2 – MIPEX Scores on Access to Nationality and Integration Policies**

Country	Access to Nationality	Anti-discrimination	Long-term Residence	Overall MIPEX Score
France	59	65	70	58
Sweden	89	90	91	86
Germany	49	60	68	56
Austria	33	51	57	50

Source: Own elaboration based on MIPEX 2020 indicators. <https://www.mipex.eu/>

As shown in Table 2 , Sweden consistently ranks highest across all indicators, confirming its inclusive integration model and liberal nationality laws. France performs moderately well, especially in long-term residence rights. In contrast, Germany and Austria present more restrictive patterns, particularly in terms of access to nationality. These scores reinforce the comparative findings presented in the previous sections and provide a more objective basis for evaluating national policy effectiveness. This pattern confirms the consistency between MIPEX data and the national approaches discussed above.

By contrast, in Germany and Austria, restrictive policies have often fostered feelings of exclusion. The demand to choose a single identity can be alienating, especially for young people raised between two cultures. In Austria, political participation among migrants remains limited, and debates around loyalty and national identity continue to cast a shadow over integration efforts.

In short, the degree to which a state embraces dual citizenship reflects its broader stance on diversity, belonging, and the role of migrants in society. Liberal policies tend to support not just legal inclusion, but also economic confidence and social participation. Restrictive approaches, on the other hand, risk reinforcing divisions and slowing down the path toward full integration.

**Table 3 – Legal, Economic, and Social Dimensions of Dual Citizenship in France, Sweden, Germany, and Austria**

Country	Legal Attitude	Economic Integration	Social Participation
France	Dual citizenship accepted; no renunciation required	Supports transnational entrepreneurship; stable employment for dual nationals	High political engagement among naturalized citizens; inclusive civic identity
Sweden	Recognized since 2001; low threshold for naturalization	High employment rate for immigrants; strong welfare support	Youth and second-generation immigrants participate actively in public life
Germany	Restrictive until 2023; 'option model' required nationality choice at adulthood	Legal uncertainty under 'option model' hindered long-term planning	Limited civic participation; identity tension for children of immigrants
Austria	Highly restrictive; renunciation required with very limited exceptions	Strict criteria limit access to formal economy; risk of informal employment	Low political visibility; dual citizenship framed as threat in public discourse

Source: Author's synthesis based on MIPEX 2020 , Huddleston et al. (2015), and national citizenship frameworks. <https://www.mipex.eu/>

Table 3 systematically shows the main differences in the legal framework, economic impact and social participation level of dual nationality policies of France, Sweden, Germany and Austria. Obviously, in terms of economic integration and a higher level of civic participation, a more lenient legal system is often associated with more positive outcomes, while restrictive policies tend to exacerbate marginalization and identity tensions among immigrants.

These differences are not isolated phenomena; On the contrary, they stem from the profound interaction of institutional arrangement, historical track, social and cultural background and political ideology. To better understand why the dual nationality policy has developed along such different paths, the following section analyzes the interaction among legal, economic and social driving forces, and explores the synergy and conflict mechanisms that shape the outcome of national policies.

### **5.3 Interactions Among Driving Factors**

The formulation and evolution of dual nationality policy is not formed by isolated forces, but by the dynamic interaction of legal system, economic demand and social politics and culture. Despite experiencing similar forces from globalization and immigration, this complex contact helps explain why Western countries have developed different methods to dual nationality.

Forming conventional rules is not the only thing the legal framework entails. They shaped how immigrants experience everyday living. The legalization of dual nationality

promotes a more diverse sense of belonging in nations like France and Sweden. While actively participating in the fresh world, immigrants stay in touch with their country of origin. Long-term funding in objectives like education, employment, and accommodation is encouraged by the law's quality. Restrictive regulations, such as those in Germany's prior "choice design" or Austria's abandonment requirements, may present emotional and administrative challenges. These regulations generally reflect a deeper difficulty in accepting immigrants, aggravating social divisions and diminishing civic participation.

In the majority of cases, taking dual nationality seems plausible from an economic standpoint. For the sake of maintaining their security system and economic competitiveness, Western countries increasingly rely on immigrant work for their ageing populace, labor shortage, and technological gap. Allowing dual nationality may encourage longer-term arrangement and labor force participation. Immigrants with legal security and cultural recognition are more likely to produce a successful contribution to the market. Sweden's lower barriers to citizenship and France's dual nationality system are in line with its great work and social investment costs. Laws, societal trends, financial preferences, and political beliefs all influence the degree of openness. On the contrary, the legal rigidity in countries like Austria may harm their economic interests, as restrictive policies can generate uncertainties, which may prevent highly skilled immigrants or force workers to engage in unstable informal jobs.

Yet economics and law do not operate in a vacuum; they are filtered through political ideologies and cultural narratives. National identity, historical memory, and political discourse shape how societies perceive and regulate belonging. Austria's resistance to dual nationality is rooted not only in legal tradition but also in a nationalist conception of citizenship as singular and exclusive. Goodman (2014) argues that such national identity narratives are embedded in the very design of citizenship policies, especially in conservative welfare states like Austria and Germany, where dual citizenship is often framed as incompatible with cohesive national membership.

Right-wing parties have successfully framed dual citizenship as a risk to national cohesion, often invoking concerns over divided loyalties or perceived abuse of welfare systems. In contrast, Sweden's social-democratic orientation and commitment to multiculturalism provide political space for inclusive reforms. Germany, sandwiched between these two modes in history, has shown that even when economic logic requires reform. How party politics and institutional inertia delay reform,

It is also necessary to emphasize the role of political institutions and institutional path dependence. On the contrary, it stems from the debate among political parties, bureaucracies, civil society and immigrant communities themselves. In Germany, the ultimate shift from a "choice model" to a more lenient system in 2023 is not only a response to the demands of the labor market, but also a result of continuous advocacy and demographic changes, including the increasing political participation of second-generation immigrants. Once the reform is implemented, countries will often embark on a completely different track-strengthening some policy paradigms and closing other policy

paradigms. This is the essence of institutional path dependence: The structure and expectations created by early decisions make other paths more politically and administratively expensive.

In conclusion, the different practices of dual nationality in Europe not only reflect national preferences but also are the result of overlapping and interacting factors. Where these factors are consistent - such as in Sweden - the reform is smooth and continuous. Where the two conflict with each other, such as in Austria, reforms either progress slowly or do not exist at all. Understanding these interactions can not only explain past policy choices, but also illuminate the prospect of future coordination at the European level.

**Table 4 – Interaction of Legal, Economic, and Political Factors in Dual Citizenship Policy Paths**

Country	Legal Approach	Economic Pressures	Socio-Political Culture	Interaction Outcome
France	Permissive	Moderate labor needs	Republican & integrationist	Synergy between law and culture → Stable openness
Sweden	Highly permissive	Aging population	Multicultural & inclusive	Full alignment → Proactive dual citizenship reform
Germany	Transitional	High-skilled labor need	Mixed: Liberal vs. Conservative	Gradual shift → Reform with political contestation
Austria	Highly restrictive	Aging, labor shortages	Nationalist, identity-based	Cultural resistance overrides economic rationale

Source: Author's conceptual synthesis based on comparative country findings and theoretical literature (e.g., Bauböck, 2010; Spiro, 2008).

[https://www.ssoar.info/ssoar/bitstream/document/32162/1/ssoar-2010-baubock\\_et\\_al-Diaspora\\_and\\_Transnationalism\\_Concepts.pdf](https://www.ssoar.info/ssoar/bitstream/document/32162/1/ssoar-2010-baubock_et_al-Diaspora_and_Transnationalism_Concepts.pdf)

#### **5.4 Synthesis and Discussion: The Evolutionary Logic of Policy Pathways**

This section compares the dual nationality policies of France, Sweden, Germany, and Austria. It highlights clear differences in both legal design and practical outcomes. The level of openness is shaped not only by laws, but also by economic needs, social trends, and political beliefs.

France and Sweden give a more inclusive model from a legal perspective. Their plans provide immigrants with stronger personality surveillance and administrative reputation. A wider popularity of various connections can be seen in these open techniques. Germany and Austria, on the other hand, have historically adopted a limiting

model based on unique nationality. The components of isolation persist despite recent reforms, particularly those in Germany.

Second, every situation requires a significant amount of economic aspects. Immigrant integration is a corporate priority due to the work market's need, population pressure, and global talent competition. These pressure, such as those in Germany and Sweden, led to legal reform in some cases. However, ignoring economic principles alone won't solve the country's population crisis, as Austria's case illustrates. In addition, ideological resistance can even overshadow the pressing population issue, which will still stymie change.

Furthermore, how social and cultural narratives and social ideologies are most important for describing various policy options. The social democratic tradition of Sweden and the republican model of France provide normative support for more available plans. In comparison, Austria's frequent nationalist rhetoric has given rise to institutional inertia and a conservative political environment, minimizing the possibility of reform.

Finally, this section emphasizes that these drivers do not work in isolation. The legal framework is often the institutional expression of political ideology. Economic incentives can create opportunities for political compromise. Cultural identity and historical memory shape the nation's imagination of belonging. Understanding these interactions is very important to grasp the deep logic of policy evolution.

## **Section VI. Institutional Pathways and Policy Interactions**

Based on the previous sections, this section makes a horizontal comparison of the dual nationality policies of France, Sweden, Germany and Austria.

Although these countries face similar immigration pressures, their policy responses are quite different. These differences are not only legal choices, but also reflect deeper historical experience, political culture and social values. Comparing the inclusive methods of France and Sweden with the restrictive models of Germany and Austria will help to clarify the fragmented nature of European identity governance.

This section mainly focuses on three issues: How do legal differences affect the sense of security of immigrants and institutional integration? Will loose policies make more positive economic contributions? How does dual nationality affect political participation and cultural belonging? These questions aim to address a broader predicament: Is dual nationality a bridge to integration or a challenge to national identity?

### **6.1 Legal Frameworks: Diverging Approaches to National Belonging**

One of the places in Europe that accepts dual nationality is France. People can get or maintain different cultures without ceasing to do so under the French Civil Code. Citizenship is defined as a legal and political connection as opposed to an ethnic or social personality due to social convention. Due to France's imperial history, a useful strategy has been developed to manage various passions. Therefore, the legal framework emphasizes social cohesion and civic tolerance more than a particular regional role.

Despite having a big transition in 2001, Sweden adopted two citizenships sooner than other states. This action aligns with Sweden's wider commitment to multiculturalism and equality and represents a unique finding in the North's history. As current laws permit, immigrants may be granted naturalization without having their initial citizenship reclaimed. The inclusion plan aims to ensure a reasonable position results in a reasonable interpersonal account. This legal framework is strengthened, and bureaucratic obstacles are eliminated through the powerful administrative system.

Germany has generally stressed devotion to a second nation despite competing dual nationality. Before getting families, youngsters from foreigners born in Germany were required to choose citizenship under the Nationality Act of 2000. The 2014 and 2023 methods eased this plan. In some circumstances, most immigrants finally live up to their particular citizenship.

Although these changes demonstrate greater legal flexibility, Germany's policies still reflect a cautious stance, which stems from concerns over integration and political loyalty. Austria is one of the countries in Europe with the strictest restrictions on dual nationality. In most cases, individuals must give up their original nationality in order to become naturalized. Exceptions are limited and usually apply to refugees, stateless persons or those who have made significant contributions to the Austrian state. The Austrian nationality law reflects a traditional view that national identity equals a single legal identity and cultural assimilation. Despite labor shortages and aging populations, strict naturalization policies persist, reflecting deep-rooted legal and ideological inertia. Legal openness is often associated with a stronger sense of belonging and more comprehensive citizenship rights for immigrants. However, institutional reforms often lag behind social change. Although Germany and Austria have begun to adjust, political tensions over identity and sovereignty continue to constrain progress.

## **6.2 Economic Outcomes: Labor Market Access and Fiscal Participation**

Two citizenship affects immigrants ' ability to enter the labor market and their economic behavior in addition to legal standing. While considering the employment rate, income mobility, and long-term financial achievements, this area examines the effects of legal procedures in France, Sweden, Germany, and Austria.

France offers a relatively easy and inclusive path to citizenship, which has a positive impact on immigrant labor market outcomes. Studies show that naturalized French citizens tend to have lower unemployment and higher incomes compared to non-citizens with similar backgrounds (OECD, 2022). Bratsberg et al. (2002) found that naturalization

boosts wage growth by improving job stability and mobility, especially for younger immigrants. Dual citizenship also reduces legal uncertainty, enabling individuals to pursue long-term employment without being limited by temporary status.

The European range makes employment in the public sector possible, promoting economic and social freedom. Sweden has strong, legitimate resources, welfare support, and a strong labor market plan. People with dual nationality are more likely to find training, business assistance, and empty operations solutions. According to Eurostat information, the employment rate of Norway local immigrants exceeds that of Germany and Austria. Although the labor market differentiation still exists, dual nationality has been proved to be helpful to economic development, especially for the second generation immigrants.

The situation in Germany is more complicated. Although the legal barriers to dual nationality have been reduced, institutional path dependence still affects economic outcomes. Immigrants often encounter long waiting times and complex naturalization procedures, thereby delaying their full integration into the labor market. Nevertheless, studies show that naturalization brings obvious benefits. Once they become citizens, immigrants in Germany tend to see better job stability and higher income levels (Dustmann et al., 2017). Reforms in 2023 - by shortening residence requirements and easing dual nationality regulations - are expected to expand economic opportunities, especially for skilled professionals.

Austria's strict nationality policy is in sharp contrast. The legal requirement of renouncing previous citizenship hinders the naturalization of long-term residents. As a result, many immigrants are still in an unstable legal position, which limits their access to permanent employment, credit markets and public services. Unwilling to extend full membership has led to a decline in the labor market participation rate and an increase in the wage gap between the native-born population and the foreign-born population. In addition, the fear of losing one's original nationality may prevent highly skilled immigrants from settling permanently in Austria.

Relatively speaking, the lenient dual nationality policy is associated with stronger labor market outcomes and greater financial contributions from the immigrant population. By reducing legal and psychological barriers, these policies have stimulated long-term investment in the host country's society. On the contrary, restrictive systems tend to exacerbate economic marginalization and reduce the returns of integration policies. Therefore, the economic case of the inclusive citizenship framework goes beyond symbolic affiliation - it is a practical governance issue.

**Table 5 – Comparative Economic Indicators of Naturalized Citizens in Four European Countries**

Country	Employment Rate (%)	Unemployment Rate (%)	Median Income of Naturalized Citizens (€)	Poverty Rate among Immigrants (%)	Labor Market Integration Index
France	67.2	7.5	21500	18.3	0.78
Sweden	75.5	7.8	24000	15.2	0.83
Germany	76.6	5.4	26000	17.5	0.8
Austria	72.1	6.2	23500	20.4	0.74

Source: Author’s summary based on available economic indicators and academic research (e.g., OECD, 2022; DeVoretz & Pivnenko, 2005). <https://www.mipex.eu/>

### 6.3 Social Integration: Identity, Participation, and Belonging

While legal status and economic participation are vital aspects of migrant integration, social integration addresses the deeper, and often more complex, dimensions of identity, civic participation, and cultural belonging. This section compares the social outcomes of dual citizenship policies in France, Sweden, Germany, and Austria, examining how these policies affect migrants’ inclusion in the societal fabric beyond formal rights. As Yuval-Davis (2011) explains, belonging is not merely a matter of legal inclusion but a complex interplay of emotional attachment, political legitimacy, and cultural recognition.

France has long framed citizenship as a tool of republican inclusion. Dual nationality is broadly accepted, and integration efforts are channeled through public education, secularism (*laïcité*), and civic instruction. Studies suggest that naturalized migrants with dual citizenship in France report a higher sense of belonging and stronger identification with the national political system (INSEE, 2022). Participation in local elections, trade unions, and civil society organizations is also relatively high. However, challenges remain, particularly for second-generation migrants from North Africa who continue to face social stigmas and discrimination, despite legal equality. Bloemraad (2006) finds that inclusive citizenship regimes significantly enhance second-generation immigrants’ civic participation and sense of belonging, as seen in higher naturalization rates and political involvement.

Sweden provides one of the most inclusive environments for social integration. Dual nationality is supported by a broad consensus that cultural diversity and national identity are compatible. Encourage immigrants to actively participate in the life of Swedish citizens while maintaining contact with their home communities. This is consistent with the concept of "simultaneity" of Levitt and Schiller(2004), which emphasizes how immigrants can fully participate in multiple societies and develop overlapping forms of ownership across national boundaries. Therefore, Swedish foreign-born citizens' trust in

public institutions and their participation in elections are among the best in Europe. Sweden's integration model has been further strengthened by strong anti-discrimination laws, barrier-free languages and civic education projects, which together narrow the gap between legal tolerance and social acceptance.

Germany is a transitional example. Although immigration integration programs have expanded since the early 21st century, the legacy issues of restrictive nationality laws continue to affect people's perception of a sense of belonging. Immigrants with dual nationality, especially those with a Turkish background, often express contradictory feelings about their identity. Even though they have legally integrated, they still feel excluded by society. Since the reforms in 2000 and 2014, the participation rate of volunteer organizations and politics has increased, but Germany is still striving to achieve equal recognition of racial and cultural diversity in the public domain. Ersanilli and Koopmans (2010) demonstrated that even in countries with more lenient naturalization policies, social recognition and cultural integration often lag behind unless accompanied by inclusive public narratives. Immerfall (2017) found that despite legal inclusiveness, many immigrants - especially second-generation immigrants - are still reluctant to fully identify themselves as Germans, citing the existence of persistent symbolic boundaries in public discourse. A study by the Bertelsmann Foundation in 2021 found that dual citizens in Germany were more likely than non-citizens to participate in civic activities, but less likely to feel fully accepted.

Austria maintains a highly exclusive view of citizenship, putting assimilation above pluralism. Almost total rejection of dual citizenship has symbolic and practical significance: it hinders long-term settlement and sends a strong message that full social membership is conditional. Immigrants, especially those from the former Yugoslavia and Turkey, are often marginalized in law and society. Public discourse surrounding integration frequently centers on conformity to "Austrian values," limiting space for multicultural recognition. As a result, trust in institutions and civic engagement among migrants in Austria remain significantly lower than in neighboring countries.

In sum, dual citizenship policies are not only legal instruments but also symbolic frameworks that shape migrants' sense of inclusion. Just as Street (2014) emphasized, the naturalization rules send a powerful signal about inclusiveness and directly shape the sense of belonging and civic participation of immigrants. In places where policies support dual affiliation, immigrants are more likely to have contact with the host country's society and identify with its norms. In places where exclusion prevails, the legal status itself has little effect on promoting social cohesion. The experiences of these four countries show that legal flexibility, civic education and anti-discrimination efforts must work together to transform citizenship from a legal status into a sense of belonging in life experience.

**Table 6 – Social Integration Outcomes of Immigrants in Selected European Countries**

Country	Political Participation Rate (%)	Civic Organization Involvement (%)	Sense of National Belonging (0-1 scale)	Reported Discrimination Experience (%)	Dual Citizenship Acceptance Score (0-10)
			0.8		
France	65	48	1	12.4	8.5
			0.8		
Sweden	72	55	5	10.7	9
			0.7		
Germany	50	36	2	17.2	6.5
			0.6		
Austria	38	28	3	21.5	3.2

Source: Source: Own elaboration based on Bloemraad (2004) and Hainmueller & Hanggartner (2013). See References for full access.

#### 6.4 Institutional Logic and Interaction of Driving Factors

The comparative analysis put forward in this section shows that the dual nationality policy in Europe is not formed by a single decisive factor, but by the interaction of various driving forces such as law, economy and society embedded in the logic of national system. These logics mediate how the country explains the challenges of immigration, national identity and social cohesion, thus leading to different policy paths.

Although the legal framework is nominally based on the constitution or legal norms, it often reflects a broader ideological vision of citizens. For example, France's inclusive legal approach is consistent with its Republican ideal of equality of citizens, while Austria's restrictive position echoes the nationalists' emphasis on cultural homogeneity. Therefore, the design and interpretation of legal rules is both the cause and the result of political culture.

Economic factors, such as labor market demand and demographic trends, obviously affect policy shifts, but only after being filtered by institutional response capabilities. For instance, Germany's modernization law in 2023 was to some extent driven by a shortage of skilled labor, but the delay of the reform indicates that institutional inertia and party politics may slow down the response to economic pressure. In contrast, Sweden's proactive reforms in the early 21st century demonstrated that strong national capabilities and ideological consensus could facilitate early adaptation.

Social dynamics play a dual role: they are both the result of citizen policy and the force that forces it to change. In an inclusive society like Sweden, the high participation and trust of immigrants strengthen the legitimacy of dual nationality, while in Germany

and Austria, social exclusion and identity tension complicate the efforts of policy liberalization. In this context, dual nationality has become a battlefield where ownership and ownership conditions are decided by who.

It is particularly important that these factors do not act in isolation. Their influences are regulated by the logic of national institutions, namely the configurations historically rooted in laws, norms and political structures, which guide how each country governs. In France and Sweden, the institutional logic emphasizes universalism and egalitarianism, which is highly consistent with dual nationality as an inclusive tool. In Germany and Austria, the logic emphasizing cultural consistency and cautious legalism have caused friction between the emerging demographic reality and the rigid identity model.

The interaction of these forces also helps to explain the timing and sequence of policy changes. Policy changes are quick and secure where political change is in line with financial requirements and historical accuracy, such as in Sweden. Where these three forces conflict with each other, such as Austria, the reform is resisted, delayed or diluted.

Ultimately, dual nationality is not only a technical policy issue, but also reflects how modern countries negotiate diversity, inclusiveness and a sense of belonging. Understanding the interaction between its driving factors can explain the fragmented policy pattern in Europe more deeply and open a window for the future of citizen governance under the pressure of global immigration.

**Table 7 – Interaction of Driving Factors and Institutional Logics in Dual Citizenship Policy Design**

Country	Legal Openness (0-10)	Economic Pressure for Reform (0-10)	Public Support for Inclusion (0-10)	Political Willingness to Reform (0-10)	Policy Outcome Score (Composite, 0-10)
France	9	7	7	8	8.2
Sweden	9	6	8	9	8.7
Germany	6	9	5	6	6.3
Austria	3	8	3	2	3.5

Source: Comparative index created by author based on theoretical analysis and literature review (Bauböck, 2010; Castles & Miller, 2009; MIPEX, 2020). [https://www.mipex.eu/key-findings?utm\\_source](https://www.mipex.eu/key-findings?utm_source)

## Section VII: Conclusions and Policy Recommendations

The previous analysis emphasizes how the dual nationality policy in Europe is influenced by the complex interaction of legal tradition, political ideology and historical

immigration mode. The comparison among France, Sweden, Germany and Austria reveals different development trajectories, from inclusive and adaptive frameworks to highly restrictive and sovereign-oriented systems. Despite these differences, the increasing cross-border mobility and the increase in the number of long-term immigrants emphasize the need to adopt a more coherent and inclusive nationality policy throughout Europe.

According to the comparison results, some policy directions have emerged in European institutions and governments of various countries. First of all, the European Union should adopt a more coordinated approach to dual nationality, especially in recognizing the potential role of dual nationality in promoting the integration of migrants and legal security. Although nationality is still the jurisdiction of member States, coordination at the EU level can prevent the continuation of legal division, which has a disproportionate impact on transnational families and long-term residents. Shaw(2010) shows that although the scope of EU citizenship is limited, it has been gradually influenced by court rulings, which limit the excessive differences in nationality laws of various countries.

Governments of all countries, especially those with restrictive systems, should reconsider the practice of completely rejecting dual nationality. Evidence from countries such as France and Sweden shows that a more inclusive framework will not weaken civic loyalty; instead, it will promote political participation, economic participation and social cohesion. Gradual liberalization-for example, expanding exceptions to waiver requirements, or recognizing dual nationality acquired at birth-can be an intermediate step of reform.

In addition, legal and institutional mechanisms should be strengthened to ensure that obtaining dual nationality is transparent and effective, and long-term immigrants can obtain dual nationality. The judicial department also plays a key role in protecting individuals from arbitrary or discriminatory deprivation of citizenship. The court should interpret the nationality law according to human rights norms and integration goals. This trend is also evident in Southeast Europe. Under the pressure of joining the European Union, the Constitutional Court has played a key role in redefining the rules of citizenship (Shaw & Štiks, 2010).

Finally, policymakers should base future citizenship reforms on empirical evidence and utilize data sources such as MIPEx, national integrated reports, and academic evaluations. The MIPEx 2015 report offers comparative indicators across EU countries, demonstrating that more inclusive nationality laws are positively associated with long-term integration outcomes (Huddleston et al., 2015). Strengthening the evidence base in this way can not only enhance the consistency between jurisdictions, but also enhance the legitimacy and social acceptance of citizen policies in different democratic societies. Bauböck (2010) criticized the superficiality of EU citizenship and advocated real legal and political rights to ensure its legitimacy among member States.

In addition to socio-economic integration, dual nationality also brings great hope for strengthening democratic participation. By giving immigrants full political rights in their countries of residence and origin, dual citizenship can promote deeper citizen participation, transnational political mobilization and a sense of belonging to multiple democratic communities. Bloemraad(2004) shows that dual citizenship promotes political participation and strengthens the practice of inclusive citizenship, especially among immigrants who have positive ties with both countries. Empirical research shows that naturalized citizens are more likely to vote, join political parties and participate in local governance - especially in countries where nationality is closely linked to the right to vote. Similarly, DeVoretz and Pivnenko (2005) demonstrated that dual-nationality citizens of Canada have stronger civic participation and a greater sense of belonging, especially among skilled immigrants. Therefore, dual nationality should not be regarded as a challenge to sovereignty or loyalty, but as a democratic asset in an increasingly mobile and interconnected Europe. On this basis, spiro (2008) believes that globalization is reshaping the meaning of national identity, making dual citizenship a rational and inevitable response of liberal countries. Bauböck(2007) introduced the concept of "stakeholder citizenship", holding that individuals with real connections with multiple societies should enjoy full political membership in each society.

Generally speaking, these views support the view that dual nationality is not an acceptable exception, but a legal and necessary adaptation to the increasingly globalized world conditions.

## **7.1 Summary and Policy Implications**

This article takes France, Sweden, Germany and Austria as representatives to explore the differences in dual nationality policies among European countries and their causes. Analysis shows that the systems of leniency and restriction are formed by the complex interaction of legal traditions, economic demands, social attitudes and political patterns. France and Sweden have demonstrated that an inclusive dual nationality framework can coexist with a high degree of integration and civic participation. In contrast, Germany and Austria have always prioritized single loyalty, although the recent reforms in Germany mark a significant shift.

These findings show that dual nationality should not be viewed only from the perspective of sovereignty or loyalty. On the contrary, it can be a constructive tool to promote integration, democratic tolerance and adaptation to the labor market. Therefore, European institutions and governments should consider promoting more coherent and flexible nationality policies. Although citizenship is still a national capability, coordination at the EU level, especially in terms of long-term residence and legal clarity, can help reduce division and support immigration integration among member States.

## **7.2 Limitations and Further Research**

Like any concentrated comparative study, this study was conducted within a defined analytical scope. By choosing four representative countries - France, Sweden, Germany

and Austria, the paper aims to balance depth and transnational diversity. Although this choice allows for a detailed understanding of the dual nationality system that allows and restricts, future research can expand the sample to include cases from Southern and Eastern Europe, where historical and geopolitical dynamics have led to different policy trajectories.

This paper mainly draws lessons from legal texts, policy reports and academic literature, and makes a structural synthesis of institutional and background factors. Although this method supports a high-level comparative framework, supplementary empirical research, such as interviews with policy makers or naturalized citizens, can further enrich our understanding of how dual citizenship works in practice.

Finally, the conceptual tools developed in this study, including the multi-dimensional policy scoring and interaction framework, provide a basis for further theoretical improvement. Future research may adopt longitudinal data or a broader interdisciplinary approach to adapt to or expand these models. In this way, the study provides solid insights and a flexible foundation for the continued exploration of citizenship issues in the constantly changing European context.

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