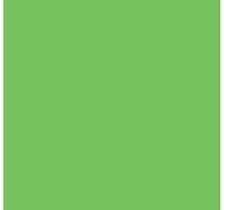




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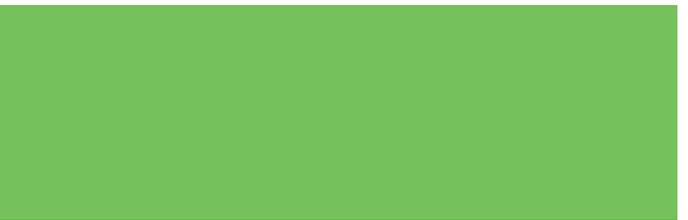
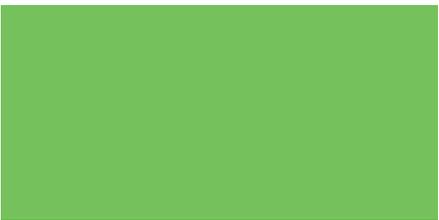
APRIL 2017

# COMPARATIVE REPORT: CITIZENSHIP IN CENTRAL AND EASTERN EUROPE



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DUMBRAVA



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# Comparative Report

## Citizenship in Central and Eastern Europe

*Costica Dumbrava*

### 1. Introduction

This report analyses contemporary citizenship laws of 17 countries from Central and Eastern Europe (CEE), including 11 new EU member states (Bulgaria, Croatia, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia and Slovenia) and 6 post-Soviet states (Armenia, Belarus, Georgia, Moldova, Russia, and Ukraine). The first part of the report presents a comparative overview of the main provisions of citizenship laws of the selected countries. The analysis is structured along three major dimensions: acquisition of citizenship at birth, acquisition of citizenship after birth, and loss of citizenship. The second part discusses key citizenship issues in the region through the prism of a comparison between citizenship policies of Eastern and Western European countries. The third part examines in more detail co-ethnic citizenship policies in CEE within a broader historical and demographic context.

### 2. Comparative analysis of citizenship laws

#### 2.1 Acquisition of citizenship at birth

The vast majority of people in the world acquire citizenship at birth, in virtue of descent from citizens (*ius sanguinis*) or due to birth on the territory of the country (*ius soli*). In Europe, the prevalent rule of acquisition of citizenship at birth is *ius sanguinis*, albeit there are a number of countries, mostly in Western Europe, that maintain rules of conditional *ius soli*.

##### 2.1.1 *Ius sanguinis*

All countries included in the survey have provisions of automatic *ius sanguinis* for children of citizens born in the country (see Table 1). The only restriction exists in Latvia, which does not allow dual citizenship in cases of children born to a citizen and a foreigner.

**Table 1 – Rules of *ius sanguinis***

	Child born in the country		Child born outside the country	
	<i>General rule</i>	<i>Special cases</i>	<i>General rule</i>	<i>Special cases</i>
<b>Armenia</b>	Automatic	-	Automatic	Consent of the foreign parent
<b>Belarus</b>	Automatic	-	Automatic	-
<b>Bulgaria</b>	Automatic	-	Automatic	-
<b>Croatia</b>	Automatic	-	Automatic	Registration if one parent is foreigner
<b>Czech R.</b>	Automatic	-	Automatic	-
<b>Estonia</b>	Automatic	-	Automatic	-
<b>Georgia</b>	Automatic	-	Automatic	
<b>Hungary</b>	Automatic	-	Automatic	-
<b>Latvia</b>	Automatic	Restriction on dual citizenship	Automatic	Restriction on dual citizenship
<b>Lithuania</b>	Automatic	-	Automatic	-
<b>Moldova</b>	Automatic	-	Automatic	-
<b>Poland</b>	Automatic	-	Automatic	-
<b>Romania</b>	Automatic	-	Automatic	-
<b>Russia</b>	Automatic	-	Automatic	NO if the child can acquire another citizenship
<b>Slovakia</b>	Automatic	-	Automatic	-
<b>Slovenia</b>	Automatic	-	Automatic	Declaration (between 13-18 years) if one parent is foreigner
<b>Ukraine</b>	Automatic	-	Automatic	-

Data source: [EUDO Citizenship](#)

In Armenia the consent of the foreign parent is required. Special procedures exist in Croatia (registration) and Slovenia (declaration), while Latvia prohibits dual citizenship in the case of children born to parents of mixed Latvian and foreign citizenship. Russia does not grant citizenship to children born to a Russian citizen and a foreign citizen if they can acquire the citizenship of the foreign parent.

### 2.1.2 *Ius soli*

In traditional countries of immigration, such as the United States and Canada, *ius soli* citizenship plays an important integrative function because it ensures the automatic inclusion of children of immigrants into the body of citizens. Whereas several European countries have rules of acquisition of citizenship by persons born in the country, the majority of European countries do not have such rules. Moldova is the only European

country that has an unconditional rule of *ius soli* citizenship. According to the Moldovan citizenship law, a person is a citizen by birth if he or she is born on the territory of Moldova from at least one parent who is a Moldovan citizen, from stateless parents, from parents who are foreign citizens, or from a stateless person and a parent who has foreign citizenship. No other country in CEE has (any) general rules of *ius soli* citizenship.

### 2.1.3 Special rules of acquisition of citizenship at birth

The children of unknown parents (found in the country) or who are stateless are vulnerable categories of persons with regard to access to citizenship. The failure of children born in a country to acquire that country's citizenship is one of the major causes of statelessness. There are relatively strong international standards protecting these vulnerable categories of persons against statelessness (Vonk et al 2014). The 1961 Convention on the Reduction of Statelessness imposes an obligation on the country of birth to grant citizenship to children who are otherwise stateless at birth either automatically at birth or upon application. The 1997 European Convention on Nationality imposes an obligation on the country of birth to grant citizenship to minor children who are born on its territory and who do not acquire at birth another citizenship. According to these two Conventions, children found in a country or of unknown parentage should, in the absence of proof to the contrary, be considered to have been born within that territory to parents possessing the citizenship of that country and thus be granted access to citizenship.

Not all CEE countries grant automatic and unconditional access to citizenship to children who are born in the country and who are otherwise stateless (see Table 2). Whereas the Czech Republic, Lithuania and Ukraine impose conditions with regard to the residence of the parents, Romania does not have a special rule of acquisition of citizenship by stateless children. All CEE countries provide for automatic *ius soli* for children found in the country, although Russia and the Czech Republic maintain limitations with regard to the age of the child found in the country.

**Table 2 – Special rules of acquisition of citizenship of birth**

	<b>Stateless at birth</b>	<b>Foundlings</b>
<b>Armenia</b>	Automatic	Automatic
<b>Belarus</b>	Automatic	Automatic
<b>Bulgaria</b>	Automatic	Automatic
<b>Croatia</b>	Automatic	Automatic
<b>Czech R.</b>	Naturalisation (if at least one parent has a resident permit)	Automatic (under the age of 3)
<b>Estonia</b>	Naturalisation	Automatic
<b>Georgia</b>	Automatic	Automatic
<b>Hungary</b>	Naturalisation	Automatic
<b>Latvia</b>	Declaration/Registration	Automatic
<b>Lithuania</b>	Automatic (if parents are legal residents)	Automatic
<b>Moldova</b>	Automatic	Automatic

<b>Poland</b>	Automatic	Automatic
<b>Romania</b>	-	Automatic
<b>Russia</b>	Automatic	Automatic (under the age of 18)
<b>Slovakia</b>	Automatic	Automatic
<b>Slovenia</b>	Automatic	Automatic
<b>Ukraine</b>	Automatic (if parents are legal residents)	Automatic

Data source: [EURO Citizenship](#)

## 2.2 Acquisition of citizenship after birth

Legal provisions regarding the acquisition of citizenship after birth by residents (naturalisation) are generally complex and cumbersome. We can distinguish between rules of ordinary naturalisation - when the primary ground of acquisition of citizenship is a certain period of residence in the country, and special naturalisation - when the acquisition of citizenship is based on other considerations, such as family links, ethno-cultural connections or special contributions.

### 2.2.1 Ordinary naturalisation

In the case of ordinary naturalisation the most important requirements for the acquisition of citizenship are related to the residential status and history of the applicant. Apart from residence, there are usually conditions about the renunciation of another citizenship, language competence, specific knowledge about the country, good behaviour, economic self-sufficiency or loyalty. Most naturalisation procedures are discretionary, meaning that the state retains the power to deny naturalisation even if all the formal naturalisation conditions are met (e.g. denial on security grounds).

In the survey, only Croatia and Poland provide for an entitlement to naturalisation (see Table 3). The minimum period of residence required for ordinary naturalisation varies from 3 to 10 years (see Figure 1). In many cases, however, the law imposes additional conditions with regard to the type of residence. The most common requirement is that applicants to naturalisation must be permanent either at the moment of naturalisation (as in the Czech Republic) or they must have been permanent residents for a period of time before application (as in Estonia) or throughout the period of time required for naturalisation (as in Poland). In Lithuania an applicant to naturalisation has to have the right to acquire permanent residence.

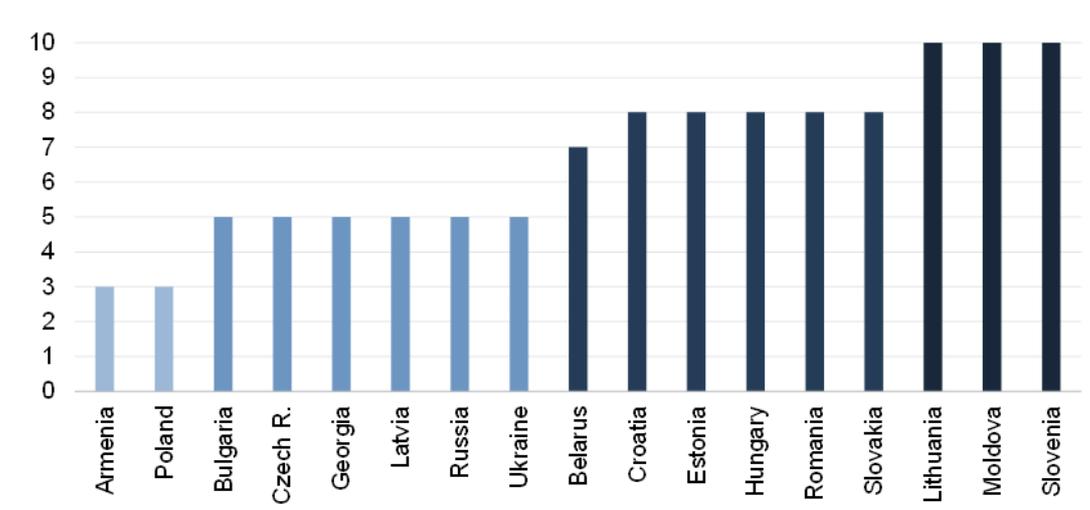
**Table 3 – Rules of ordinary naturalisation**

	<b>Residence (years)</b> <i>*permanent</i>	<b>Renunciation of other citizenship</b>	<b>Language</b>	<b>Knowledge about the country</b> <i>*test</i>	<b>Good character</b>	<b>Self- sufficiency</b>
<b>Armenia</b>	3*	-	Yes	-	Yes	-
<b>Belarus</b>	7	Yes	Yes	-	Yes	Yes
<b>Bulgaria</b>	5*	Yes	Yes	-	Yes	Yes
<b>Croatia</b>	8	Yes	Yes	-	-	-
<b>Czech R.</b>	5*	-	Yes	Yes*	Yes	Yes
<b>Estonia</b>	8*	Yes	Yes	Yes*	-	Yes
<b>Georgia</b>	5	Yes	Yes	Yes	Yes	Yes
<b>Hungary</b>	8*	-	Yes	Yes*	Yes	Yes
<b>Latvia</b>	5*	Yes	Yes	Yes*	Yes	Yes
<b>Lithuania</b>	10	Yes	Yes	Yes*	Yes	Yes
<b>Moldova</b>	10	Yes	Yes	Yes*	-	Yes
<b>Poland</b>	3*	-	Yes	-	Yes	Yes
<b>Romania</b>	8	-	Yes	Yes*	Yes	Yes
<b>Russia</b>	5*	Yes	Yes	-	Yes	Yes
<b>Slovakia</b>	8	-	Yes	Yes	Yes	Yes
<b>Slovenia</b>	10*	Yes	Yes	-	Yes	Yes
<b>Ukraine</b>	5*	Yes	Yes	-	Yes	Yes

Data source: [EUDO Citizenship](#)

The majority of the countries included in the survey (11 out of 17) require applicants to renounce foreign citizenship in order to naturalise (see Figure 2). In Croatia and Slovenia this requirement does not apply when the renunciation of another citizenship is not possible. The Latvian citizenship law provides for explicit exemptions from this rule in the cases of citizens of the EU, NATO and EFTA countries.

In all the countries included in the survey, the applicants for naturalisation have to demonstrate that they have a certain level of command of the official language of the country. This proof is established through an official language test or through informal interviews. In Belarus, the applicants should prove knowledge of at least one of the two official languages of the country (Russian or Belarusian).

**Figure 1 – Ordinary naturalisation - minimum residence**

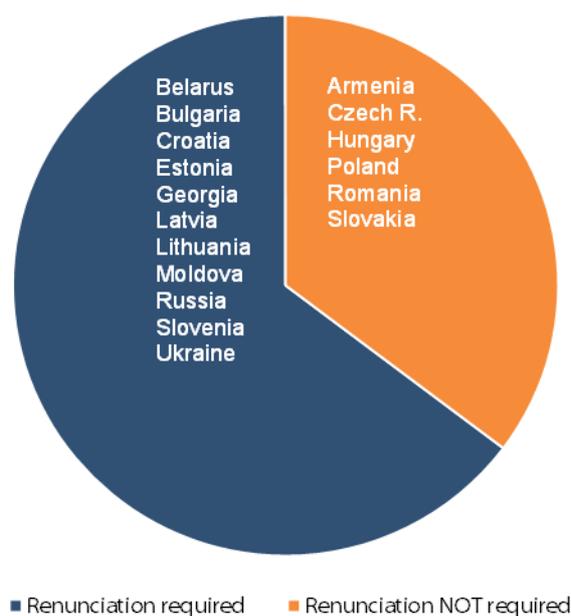
Data source: [EUDO Citizenship](#)

Formal requirements about the good character of the applicants exist in all but three CEE countries (Croatia, Estonia and Moldova). The good character is most often demonstrated by a clean criminal record. In the Czech Republic, offences related to breaking the immigration law may disqualify applicants for naturalisation. According to the Armenian citizenship law, naturalisation is refused if the applicant's activities 'violate state and social security, public order, protection of the public health and traditions or rights, freedoms, dignity and good reputation of the others'. The Lithuanian citizenship law makes explicit reference to offences considered as international crimes such as aggression, genocide, crimes against humanity and war crimes, whereas the Russian citizenship law disqualifies from naturalisation persons who 'participate in anti-state or terrorist activities'.

More than half of CEE countries have naturalisation requirements regarding knowledge of particular aspects of their legal and political system, history, society or culture. The required knowledge covers elements as various as the 'history and the basic principles of law' (Georgia), 'basic constitutional issues' (Hungary), 'the Constitution, the anthem and the history' (Latvia) and 'culture and civilization' (Romania). This knowledge is assessed by means of an interview (as in Slovakia) or through a specific citizenship test (as in the Czech Republic, Estonia, Hungary, Latvia, Lithuania, Moldova and Romania).

Naturalisation conditions related to the self sufficiency of the applicants exist in all but two CEE countries (Armenia and Croatia). Self-sufficiency in the context of naturalisation process is demonstrated by the employment record of the applicants and/or by the existence of other sources of personal income. Slovenia also checks whether the applicants has unfulfilled tax obligation and the Czech Republic requires explicitly that the applicants for naturalisation have not become a public burden during the three years preceding the application.

Lastly, citizenship laws often contain more general and admittedly ambiguous conditions regarding the behaviour, loyalty, integration and the moral standards of the applicants. Such references include: 'respect for the legal order, customs and culture of the country' (Croatia); no threat to the 'interests of the country' (Hungary), 'good moral character' (Slovakia), and 'attachment to the state and people' (Romania).

**Figure 2 – Ordinary naturalisation - renunciation of another citizenship**Data source: [EUDO Citizenship](#)

### 2.2.2 Special naturalisation

There are several categories of persons who typically enjoy preferential access to citizenship, such as spouses of citizens, former citizens, co-ethnics, persons with special achievements or of great interest for the country and recognised refugees.

All countries in CEE, apart from Belarus, Estonia, Latvia and Poland, have special rules of acquisition of citizenship by spouses of citizens (see Table 4). In Croatia and Hungary, the spouses of citizens are entitled to naturalisation. In most countries, the spouses need to spend less time in the country than applicants for ordinary naturalisation in order to qualify for naturalisation. In Armenia, Croatia and the Czech Republic, the requirement regarding the minimum period of residence is waived altogether for the spouses of citizens. Bulgaria and Ukraine impose an additional condition with regard to the minimum period of marriage before naturalisation (3 and 2 years, respectively).

**Table 4 – Special naturalisation - spouses of citizens**

	Procedure	Residence (Years) <i>*Permanent</i>	Renunciation of other citizenship	Language	Other conditions
<b>Armenia</b>	Discretionary	Waived	-	Waived	Yes
<b>Belarus</b>	N/A				
<b>Bulgaria</b>	Discretionary	3	Yes	Yes	Yes
<b>Croatia</b>	Entitlement	Actual*	-	-	Yes
<b>Czech R.</b>	Discretionary	Waived	-	-	Yes

<b>Estonia</b>	N/A				
<b>Georgia</b>	Discretionary	2	Yes	Yes	Yes
<b>Hungary</b>	Entitlement	3	-	-	Yes
<b>Latvia</b>	N/A				
<b>Lithuania</b>	Discretionary	7	Yes	Yes	Yes
<b>Moldova</b>	Discretionary	3	Yes	Yes	Yes
<b>Poland</b>	N/A				
<b>Romania</b>	Discretionary	5	Yes	Yes	Yes
<b>Russia</b>	Discretionary	3	Yes	Yes	Yes
<b>Slovakia</b>	Discretionary	5	-	Yes	Yes
<b>Slovenia</b>	Discretionary	3	Yes	Yes	Yes
<b>Ukraine</b>	Discretionary	2	Yes	Yes	Yes

Data source: [EUDO Citizenship](#)

The citizenship laws of most CEE countries have provisions regarding the facilitated access to citizenship for certain categories of former citizens and/or persons who are regarded as belonging to certain national or ethnic groups. These categories of special foreigners and the rationales underpinning their preferential inclusion are not always clearly distinguished by the law or in practice. For example, citizenship rules that officially aim at preserving special ties with particular ethno-cultural communities living outside the borders may disguise revisionist claims over historical territories (as in Russia and Hungary). Similarly, citizenship rules that are formally presented as restoring civic-political bonds with former citizens may seek to conceal strategies of ethno-national reintegration or consolidation (as in Romania and Latvia). Apart from Moldova, all countries included in the survey have provisions of preferential access to citizenship for categories of former citizens and/or co-ethnics (see Table 5).

Most CEE countries that have recently experienced changes of statehood maintain special rules of acquisition of citizenship by persons who had been previously connected to the country or its territories. Armenia, Belarus, Georgia and Russia give preferential access to citizenship to particular categories of former USSR citizens. The Czech Republic offers facilitated citizenship to former Czechoslovak citizens who have not obtained the Czech or the Slovak citizenship. In several cases, the triggering factor for preferential treatment is related to past events that go back several decades or centuries. For example, Hungary grants access to citizenship to persons (and their descendants) who were citizens of the pre-1920 Hungarian state. Romania facilitates access to citizenship to former citizens (and their descendants) who lost Romanian citizenship independent of their will, particularly as a consequence of the territorial losses that occurred in 1940. In the early 1990s, Latvia and Estonia restored citizenship to persons (and their descendants) who were citizens of their pre-1940 states, while restricting access to citizenship for Soviet-era immigrants and thus creating wide-spread statelessness. Emigrants are expressly targeted by the citizenship laws of Croatia and Lithuania, while certain people who repatriate from abroad enjoy special citizenship privileges in Poland and Russia.

There are citizenship laws that target explicitly people who belong to particular ethnic groups, such as ‘Armenians by origin’, persons of ‘Bulgarian origin’, persons of ‘Croatian ethnicity’, persons of presumed ‘Hungarian origin’, ‘Latvian or Livs’, persons of ‘Lithuanian origin, persons of ‘Slovak ethnicity’, and persons ‘belonging to Slovene minorities’. In some cases, the law relies only on certain approximate markers of ethnicity, such as language (Russia) or territorial origin (Ukraine). The scope of citizenship facilitations for former citizens and co-ethnics ranges from full exemptions from naturalisation requirements to partial exemptions, such as waived or less stringent conditions regarding residence or the renunciation of other citizenship (see Figure 3).

**Table 5 – Special naturalisation - former citizens and co-ethnics**

	Former citizens/residents of specific states/territories		Co-ethnics	
	<i>Target</i>	<i>Main facilitations</i>	<i>Target</i>	<i>Main facilitations</i>
<b>Armenia</b>	Certain categories of former citizens of the Soviet Armenian R.	All conditions can be waived	Armenian by origin and their descendants	All conditions waived
<b>Belarus</b>	Certain categories of former citizens of the USSR	All conditions can be waived apart from actual residence	Former Belarusians and their descendants	Residence can be reduced or waived
<b>Bulgaria</b>	-	-	Persons of Bulgarian origin	All conditions waived, except for criminal record
<b>Croatia</b>	Emigrants and their descendants	All conditions waived, except for respect for the legal order, customs and culture	Persons of Croatian ethnicity	All conditions waived, except for respect for the legal order, customs and culture
<b>Czech R.</b>	Persons who were citizens of Czechoslovakia as of 31/12/1992 and do not have Check or Slovak citizenship (and their descendants)	All conditions waived	-	-
<b>Estonia</b>	Persons who were citizens of Estonia of 16/6/1940 and their descendants	All conditions waived	-	-
<b>Georgia</b>	Certain categories of former citizens of the Soviet Georgian republic	All conditions can be waived	-	-

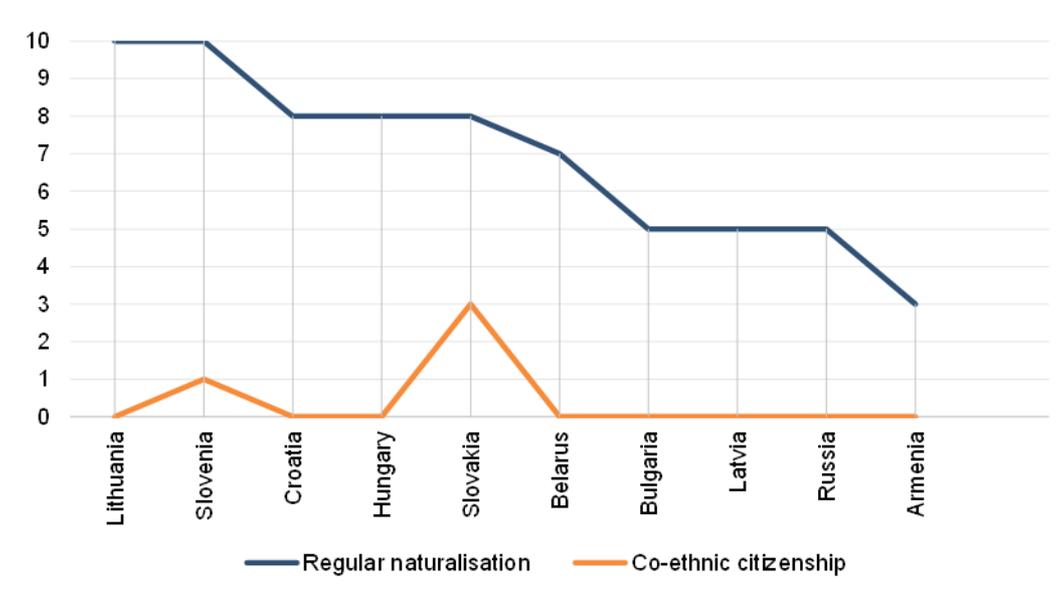
<b>Hungary</b>	Former citizens and descendants	No condition of residence	Persons of presumed Hungarian origin and their descendants	No condition of residence
<b>Latvia</b>	Persons who were citizens of Latvia on 17/6/1940 and their descendants (born before 1/10/2014).	All conditions waived	Latvian or Livs whose ancestors lived in the territory of Latvia between 1881 and 1940	No conditions of residence or renunciation of other citizenship
<b>Lithuania</b>	Emigrants and persons deported after 1940 and their descendants	All conditions waived	Persons of Lithuanian origin	All conditions waived, except for criminal record
<b>Moldova</b>	-	-	-	-
<b>Poland</b>	Persons of Polish descent repatriated from Russia	All conditions waived	-	-
<b>Romania</b>	Former citizens who were deprived of citizenship and their descendants	No conditions of residence, language and self-sufficiency	-	-
<b>Russia</b>	Russian compatriots who repatriate	No conditions of past residence, language and self-sufficiency	Native Russian speakers from the territories of the former USSR	No condition of residence
<b>Slovakia</b>	-	-	Person of Slovak ethnicity	Reduced period of residence
<b>Slovenia</b>	Former citizens and their descendants	No condition of past residence or renunciation of other citizenship	Persons belonging to Slovene minorities in neighbouring states	Reduced period of residence, no conditions of self-sufficiency and renunciation of other citizenship
<b>Ukraine</b>	Persons who were born or resided permanently in certain historical territories before 24/09/1991	All conditions waived except for renunciation of other citizenship	-	-

Data source: [EUDO Citizenship](#)

All the countries included in the survey have special provisions of preferential access to citizenship for persons with special achievement or who bring a special contribution to the country (see Table 6). These procedures are always discretionary. Estonia has a

quota of maximum 10 naturalisations on such grounds per year. Romania has an ‘honorary citizenship’ scheme, which entitles its holders to all civil and political rights except for running for elections and holding public office. In 2014, Russia introduced a provision for exceptional naturalisation of persons who obtained a high degree in the country and worked for 3 years there.

**Figure 3 – Residence requirement - regular foreigners and co-ethnics (years)**



Data source: [EUDO Citizenship](#)

**Table 6 – Special naturalisation - persons with special achievements or contributions**

	Grounds	Main facilitations
<b>Armenia</b>	Exceptional services to the country	All conditions can be waived
<b>Belarus</b>	Outstanding merits to the country; special qualification	Residence can be reduced or waived
<b>Bulgaria</b>	Special achievements	All conditions can be waived
<b>Croatia</b>	Special interest of the country	All conditions can be waived except for respect for legal order, customs and culture
<b>Czech R.</b>	Great benefit for the country	Residence waived; permanent residence required
<b>Estonia</b>	Special merits	All conditions can be waived
<b>Georgia</b>	Person who has made a contribution of exceptional merit	All conditions can be waived
<b>Hungary</b>	Special interest of the country	All conditions can be except for criminal record; actual residence required

<b>Latvia</b>	Special service to the country	All conditions can be waived
<b>Lithuania</b>	Exceptional services to the country	All conditions can be waived; permanent residence required
<b>Moldova</b>	Special interest of the country	All conditions can be waived except for criminal record;
<b>Poland</b>		
<b>Romania</b>	Internationally renowned personalities	Reduced residence
<b>Russia</b>	Special achievements	Residence can be reduced or waived
<b>Slovakia</b>	Benefit for the country	Waived residence
<b>Slovenia</b>	Benefit for the country	Waived renunciation of other citizenship and language conditions
<b>Ukraine</b>	Special merits or in the interest of the country	All conditions can be waived except for renunciation of other citizenship and respect for the laws

Data source: [EUDO Citizenship](#)

Recognised refugees are in a precarious situation with regard to access to citizenship. The 1951 Convention Relating to the Status of Refugees and the 1997 European Convention on Nationality encourage states to provide for special acquisition procedures or for facilitated naturalisation for recognised refugees. However, about half of CEE countries do not have special provisions for the acquisition of citizenship by recognised refugees (see Table 7). This situation is highly problematic in view of the recent significant influx of asylum seekers and refugees into Europe.

**Table 7 – Special naturalisation - recognised refugees**

	<b>Procedure</b>	<b>Residence (years)</b>	<b>Other conditions</b>
<b>Armenia</b>	N/A		
<b>Belarus</b>	N/A		
<b>Bulgaria</b>	Discretionary	3	Yes
<b>Croatia</b>	N/A		
<b>Czech R.</b>	Discretionary	0	Yes
<b>Estonia</b>	N/A		
<b>Georgia</b>	Discretionary	5	Yes
<b>Hungary</b>	Entitlement	3	Yes
<b>Latvia</b>	N/A		
<b>Lithuania</b>	Discretionary	0	Yes
<b>Moldova</b>	N/A		
<b>Poland</b>	Entitlement	2	Yes
<b>Romania</b>	Discretionary	4	Yes

<b>Russia</b>	N/A		
<b>Slovakia</b>	Discretionary	4	Yes
<b>Slovenia</b>	Discretionary	5	Yes
<b>Ukraine</b>	N/A		

Data source: [EUDO Citizenship](#)

Only in Hungary and Poland do recognised refugees have an entitlement to naturalisation. The facilitations offered to recognised refugees persons vary across countries. Whereas the Czech Republic and Lithuania waive conditions of residence, other countries impose less stringent residential conditions (see Figure 4). In Armenia, Belarus, Croatia, Estonia, Georgia and Latvia, in order to naturalise, recognised refugees must reside in the country for the same period of time as regular foreigners. In all cases, recognised refugees must fulfil additional conditions in order to become naturalised.

## 2.3 Loss of citizenship

### 2.3.1 Voluntary loss of citizenship

None of the countries included in the survey imposes a general ban on the voluntary loss of citizenship. In line with international norms on avoiding statelessness, all countries make the renunciation of citizenship conditional on the possession of another citizenship (see Table 8).

However, most citizenship laws allow for the renunciation of citizenship if the person ‘will acquire’ but has not yet acquired another citizenship. This is the case in Bulgaria, Croatia, the Czech Republic, Estonia, Hungary, Latvia, Moldova, Romania, Russia, Slovakia, Slovenia and Ukraine. The Slovenian citizenship law provides for the withdrawal or the release from citizenship if no other citizenship is acquired within two years after renunciation.

**Table 8 – Voluntary loss of citizenship - conditions**

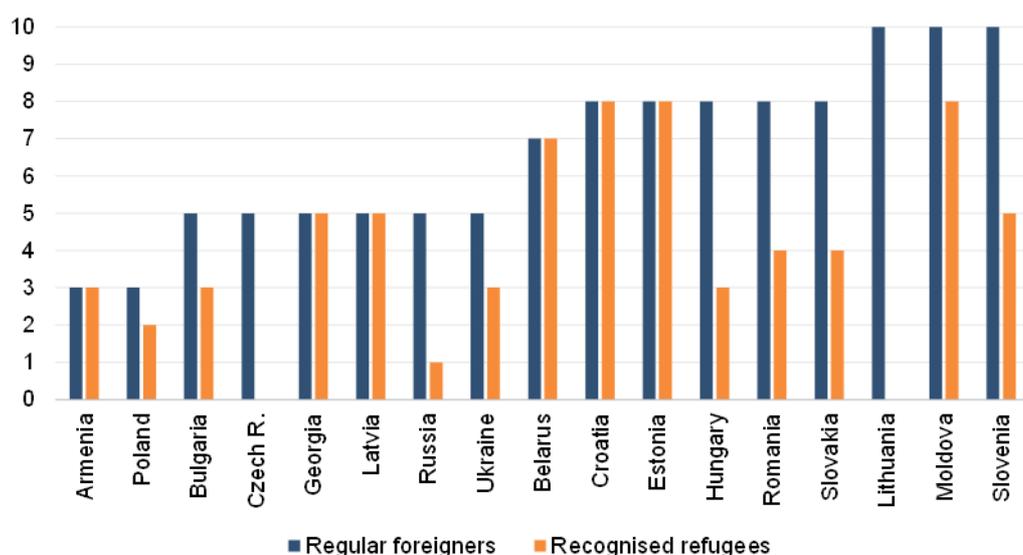
Country	Possession of another citizenship	Residence abroad	No ongoing charges or convictions	Completed military (or alternative) service	No other obligations towards the state/ others
<b>Armenia</b>	Yes	No	Yes	Yes	Yes
<b>Belarus</b>	Yes	No	Yes	No	Yes
<b>Bulgaria</b>	Yes	Yes	No	No	No
<b>Croatia</b>	Yes	Yes/No	No	No/Yes	No/Yes
<b>Czech R.</b>	Yes	Yes	No	No	No
<b>Estonia</b>	Yes	No	No	Yes	Yes

<b>Georgia</b>	Yes	No	Yes	Yes	Yes
<b>Hungary</b>	Yes	Yes	No	No	No
<b>Latvia</b>	Yes	No	No	Yes	Yes
<b>Lithuania</b>	Yes	No	Yes	No	No
<b>Moldova</b>	Yes	Yes	No	No	No
<b>Poland</b>	Yes	No	Yes	No	No
<b>Romania</b>	Yes	No	Yes	No	Yes
<b>Russia</b>	Yes	No	Yes	Yes	Yes
<b>Slovakia</b>	Yes	No	Yes	No	Yes
<b>Slovenia</b>	Yes	Yes/No	No/Yes	No/Yes	No/Yes
<b>Ukraine</b>	Yes	Yes	Yes	No	No

Data source: [EUDO Citizenship](#)

In Bulgaria, the Czech Republic, Hungary, Moldova and Ukraine, only persons who reside outside the country can renounce citizenship, whereas in Croatia and Slovenia, non-residents have to meet fewer conditions than residents in order to renounce citizenship. In most countries, persons cannot renounce citizenship if they face ongoing criminal charges or convictions. The failure to fulfil the obligatory military service is an explicit ground for refusing requests to be released from citizenship in Armenia, Croatia (residents), Estonia, Georgia, Latvia, Russia and Slovenia (residents).

**Figure 4 – Residence requirement - regular foreigners and refugees (years)**



Data source: [EUDO Citizenship](#)

Most countries in the survey impose additional conditions related to outstanding obligations or debts towards state authorities, natural or legal persons. These conditions can be wide and ambiguous. For example, in Armenia, a person cannot renounce citizenship if she has ‘unsettled obligations related to vital interests of State, Governmental and non-governmental organisations, and citizens’.

### 2.3.2 *Involuntary loss of citizenship*

Citizenship laws provide for a variety of grounds for the involuntary loss of citizenship - no less than fourteen modes, according to EUDO citizenship’s typology. The most important grounds are: maintaining residence abroad, voluntarily acquiring another citizenship, taking up service in a foreign army or rendering services to foreign countries, committing acts of disloyalty or treason, and fraudulently acquiring citizenship.

No country included in the survey provides for the involuntary loss of citizenship on grounds of residence abroad (see Table 9). In Estonia, Georgia, Latvia, Lithuania, Slovakia and Ukraine, the voluntary acquisition of another citizenship constitutes a ground for the withdrawal of citizenship. The Czech Republic repealed such a provision in 2014. Citizens who enroll in a foreign army or render services to foreign countries can lose citizenship in Belarus, Estonia, Georgia, Latvia, Lithuania, Moldova, Romania and Ukraine. In Estonia, this provision does not apply in the case of citizens by birth. In Romania, the provision is triggered only when the citizen enrolls in the service of a country with which Romania has suspended diplomatic relations or is at war.

Disloyalty or treason constitutes grounds for involuntary loss of citizenship in seven countries. Such provision may refer to various types of behaviours, such as: committing ‘serious crimes against the country’ (Bulgaria), attempting to forcibly change the constitutional order of the country (Estonia), to violently overthrow the government, or to publicly advocate ending the country’s independence (Latvia), attempting to commit international crimes or ‘criminal acts against the country’ (Lithuania), acting in ways that are ‘seriously prejudicial to the interests of the country’ (Moldova), supporting terrorist organisations (Romania) or, more generally, acting contrary to the interests of the country (Romania, Slovenia). In Estonia and Lithuania, these provisions do not apply to citizens by birth, whereas in Romania and Slovenia, the loss of citizenship occurs only if the person resides outside the country.

In all countries but Croatia and Poland the discovery of fraud in relation to the acquisition of citizenship leads to the involuntary loss of citizenship. In the cases of Bulgaria, Hungary and Latvia, this ground of loss can only be triggered within ten years after the acquisition of citizenship.

**Table 9 – Involuntary loss of citizenship - grounds of loss**

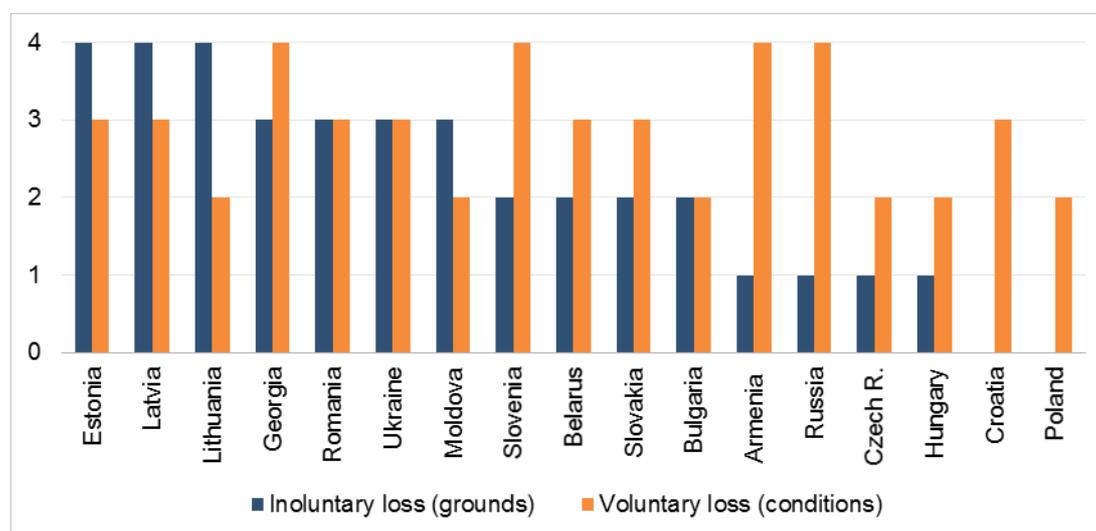
	<b>Residence abroad</b>	<b>Voluntary acquisition of other citizenship</b>	<b>Service in foreign army/ other services</b>	<b>Disloyalty or treason</b>	<b>Fraud in acquisition</b>
<b>Armenia</b>	No	No	No	No	Yes
<b>Belarus</b>	No	No	Yes	No	Yes

<b>Bulgaria</b>	No	No	No	Yes	Yes
<b>Croatia</b>	No	No	No	No	No
<b>Czech R.</b>	No	No	No	No	Yes
<b>Estonia</b>	No	Yes	Yes	Yes	Yes
<b>Georgia</b>	No	Yes	Yes	No	Yes
<b>Hungary</b>	No	No	No	No	Yes
<b>Latvia</b>	No	Yes	Yes	Yes	Yes
<b>Lithuania</b>	No	Yes	Yes	Yes	Yes
<b>Moldova</b>	No	No	Yes	Yes	Yes
<b>Poland</b>	No	No	No	No	No
<b>Romania</b>	No	No	Yes	Yes	Yes
<b>Russia</b>	No	No	No	No	Yes
<b>Slovakia</b>	No	Yes	No	No	Yes
<b>Slovenia</b>	No	No	No	Yes	Yes
<b>Ukraine</b>	No	Yes	Yes	No	Yes

Data source: [EUDO Citizenship](#)

There are a number of countries where citizenship is both easy to lose and hard to renounce, as in the cases of ex-Soviet Union countries (the Baltic countries, Georgia, Ukraine and Moldova) (see Figure 5). Other post-communist countries, such as Bulgaria, the Czech Republic, Poland and Hungary, have put in place strong constitutional provisions against the deprivation of citizenship, which diminish considerably the number of grounds of involuntary loss of citizenship. In Bulgaria, Estonia and Romania, the special protection against the involuntary loss of citizenship only concerns citizens by birth.

**Figure 5 – Loss of citizenship - involuntary (grounds) and voluntary (conditions)**



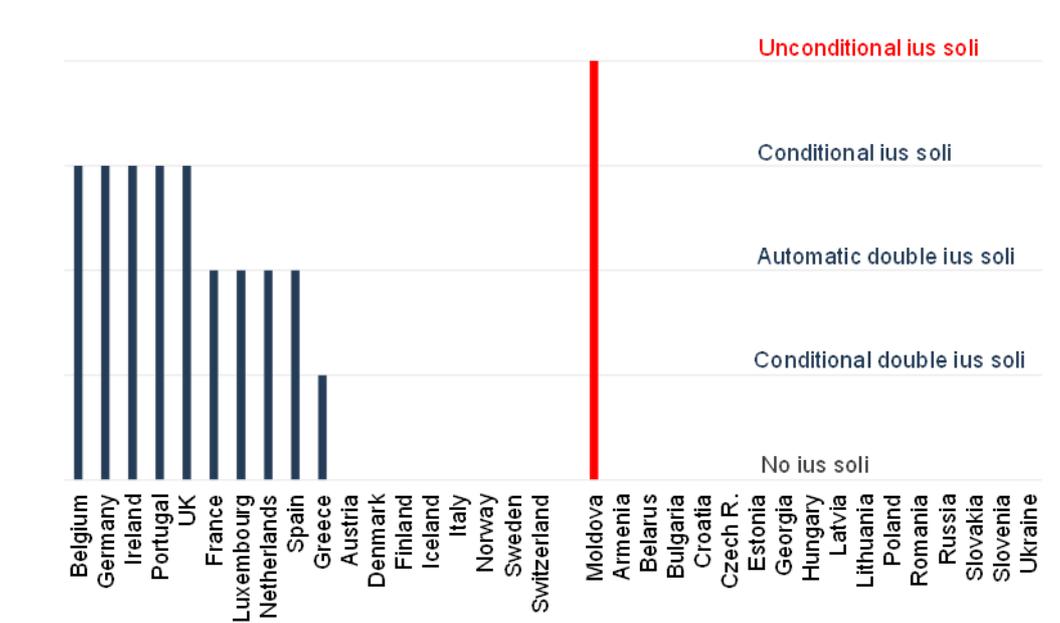
Data source: [EUDO Citizenship](#)

### 3. Citizenship in Eastern and Western Europe

Various historical experiences related to statehood, migration and democratisation have influenced the development of different citizenship policies in Europe (Weil 2001). In line with arguments about different types of nationhood in Europe, which distinguish broadly between Western and Eastern nationalism (Kohn 1944) and between civic and ethnic conceptions of citizenship (Brubaker 1992), Liebich (2010: 3) recognised a ‘gulf between conceptions of citizenship in East and West.’ Liebich’s argument relied on the observation that the prevalent rule of birthright citizenship in Eastern European was *ius sanguinis*. However, most countries in Europe have extensive rules of *ius sanguinis*, which permit, for example, the automatic transmission of citizenship outside the country across generations (Dumbrava 2014).

The major difference between birthright citizenship rules in Eastern and Western Europe lies in the fact that the majority of countries in the West maintain rules of conditional *ius soli* (including for second generation of persons born in the country - *double ius soli*), either in virtue of their legal traditions (e.g. the UK, Ireland) or as a response to old or new immigration (e.g. France, Germany). Except for Moldova, no country in the CEE has provisions of *ius soli*<sup>1</sup> (see Figure 6).

**Figure 6 – *Ius soli* in Western and Eastern Europe**

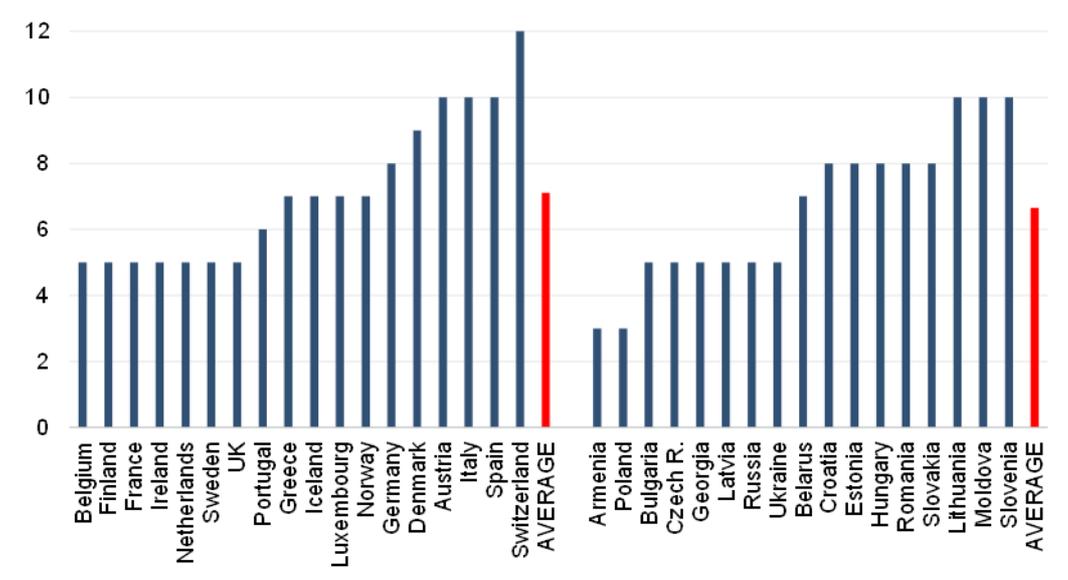


Data source: [EUDO Citizenship](#)

While no clear difference exists between Western and Eastern European countries with regard to the naturalisation requirement of residence (see Figure 7), the acceptance of dual citizenship in naturalisation is more prevalent in Western Europe (see Figure 8).

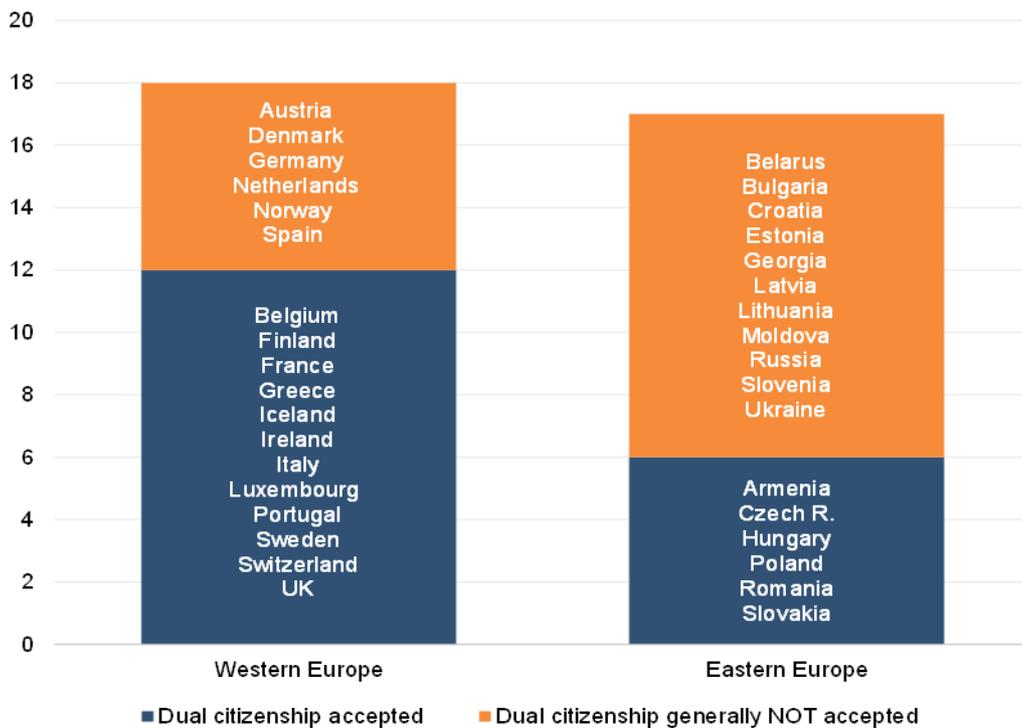
#### 8).Figure 7 – Naturalisation in Western and Eastern Europe - residence (years)

<sup>1</sup> Albania has also rules of conditional *ius soli* but the country is not included in this report.



Data source: [EUDO Citizenship](#)

The toleration of dual citizenship shows a more general pattern: whereas only about 20% of the countries in the world allowed naturalised citizens to retain another citizenship in 1960 (28% of European countries), this share grew to about 60% by 2013 (69% of European countries) (Vink et al. 2016). **Figure 8 – Naturalisation in Western and Eastern Europe - dual citizenship**

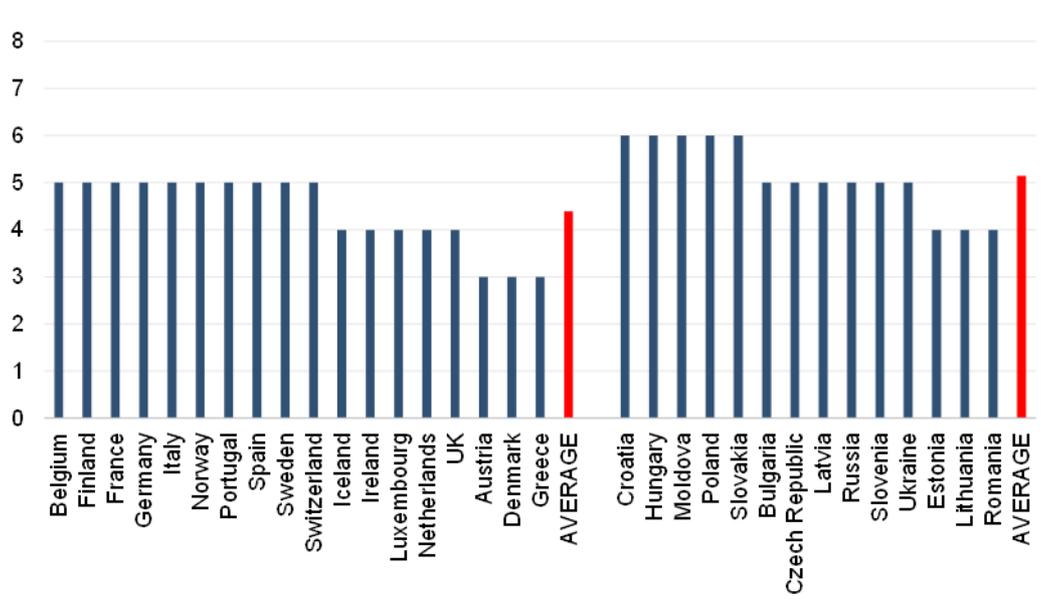


Data source: [EUDO Citizenship](#)

This is a consequence of the general application of the principle of gender equality in citizenship matters and of the rethinking of citizens' military duties and expectations. The increased acceptance of dual citizenship is often taken as an indicator of an overall liberalisation of citizenship policies in recent decades (Joppke 2008). However, policies on dual citizenship may serve different purposes depending on the context.

Apart from supporting the integration of immigrants, which are no longer forced to relinquish their citizenship of origin, dual citizenship can also be used as 'a tool for expanding the national community beyond state borders' (Bauböck 2007: 70) by offering formal and symbolic means to reintegrate emigrants, former citizens or co-ethnics. Preferential rules of acquisition or retention of citizenship for such categories of people are not confined to CEE countries. They exist, for example, in countries such as Denmark, Greece, Israel, Italy, Ireland, Portugal and Spain (Dumbrava 2014; Harpaz 2015; Mateos 2013). However, these citizenship policies tend to be more far-reaching and more contested in CEE than in other regions.

**Figure 9 – Level of formal protection against statelessness in Europe**



Data source: Vonk et al. 2016

According to a study measuring the level of formal protection against statelessness in Europe and the Americas (Vonk et al. 2016), the citizenship laws of CEE countries have stronger legal safeguards against statelessness. The higher scores shown in the Figure 9 mean that these countries have more modes of acquisition and loss of citizenship that satisfy minimum standards of protection against statelessness, as defined by applicable legal instruments.

#### 4. Citizenship and ethnicity in Central and Eastern Europe

The wide spread of co-ethnic citizenship policies in CEE can be understood in the light of the region's complex history of nation building and of more recent demographic developments. The fall of the communist regimes and the dismantling of the multinational states of the Eastern bloc rekindled old struggles over state and nation building. Of the 17 countries included in the survey, only Bulgaria, Hungary, Poland and Romania were independent states in 1989. The other countries were part of federal entities: the Soviet Union (Armenia, Belarus, Estonia, Georgia, Latvia, Lithuania, Moldova, Russia and Ukraine), Yugoslavia (Croatia and Slovenia) and Czechoslovakia (the Czech Republic and Slovakia). The new and restored states had to enact citizenship legislation in order to demarcate their populations.

The ensuing processes of redrafting constitutions and citizenship laws provided unique chances to redefine the boundaries of the nation and to integrate diverse populations. But the moment was also propitious for projects of national consolidation based on exclusion and ethnic engineering. After 1990 most CEE countries acted as 'nationalising states' (Brubaker 1996), seeking to secure the control of the core ethnic majority over state institutions and over the official definition of the nation. Citizenship policies have been used to ensure the unity of the nation within and across state borders (Pogonyi et al. 2010). Whereas the explicit exclusion from citizenship based on ethnic grounds was prohibited by international norms, which most of these countries were forced to accept as a condition for European and transatlantic integration, indirect exclusion based on seemingly legitimately grounds was still possible. For example, Estonia and Latvia effectively denaturalised large proportions of their populations by reinstating their pre-Soviet citizenship laws and thus excluding from citizenship all Soviet-era immigrants and their descendants (Gelazis 2000).

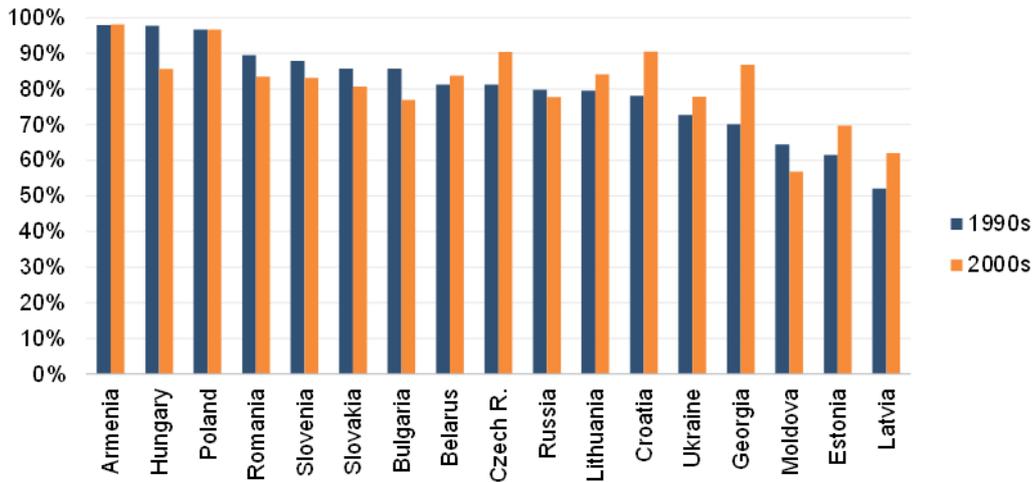
The projects of national reintegration in CEE were also pursued via policies of preferential inclusion of co-ethnics – people regarded as sharing special ethnic, cultural or historical ties with the country. It must be noted, however, that the presence of ethnic minorities on the territory of a country and/or of co-ethnic minorities outside its borders are not sufficient conditions for the adoption of generous co-ethnic citizenship policies. For example, Ukraine has pursued deliberately 'civic' citizenship policies, not despite but because of its constitutive political and identity conflicts (Shevel 2009).

Comparing data on self-declared ethnicity collected through censuses that took place in the early 1990s and the late 2000s<sup>2</sup>, we can see that most CEE countries that had weak ethnic majorities in the 1990s have consolidated their ethnic majorities by 2000s (see Figure 10). In the same time, the number of co-ethnics living outside their kin state and in another CEE country<sup>3</sup> has decreased considerably, from 30.9 million to 22.2 million in the same period (see Table 10), suggesting a process of ethnic 'unmixing' in the region.

<sup>2</sup> Data from censuses in Armenia (2001; 2011), Belarus (1999; 2009) Bulgaria (1992; 2011), Croatia (1991; 2011), the Czech Republic (1991; 2001), Estonia (1989; 2011), Georgia (1989; 2014), Hungary (1990; 2011), Latvia (1989; 2011), Lithuania (1989; 2011), Moldova (1989; 2014), Poland (2002), Romania (1992; 2011), Russia (2002; 2010), Slovakia (1991; 2011), Slovenia (1991; 2002) and Ukraine (1989; 2001).

<sup>3</sup> According to census data from the 17 CEE countries (see footnote 1) and from Albania (1989; 2011); Azerbaijan (1999; 2009), Bosnia and Herzegovina (1991; 2013), Kazakhstan (1989; 2009), Kosovo (1991; 2011), Macedonia (1991; 2002), Montenegro (2003; 2011), and Serbia (2002; 2011).

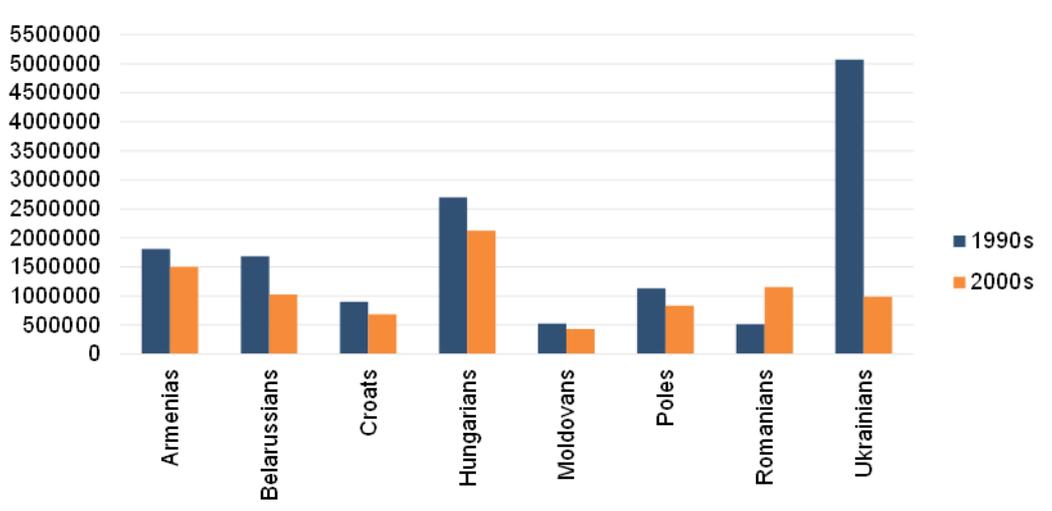
**Figure 10 - Evolution of ethnic majorities in CEE**



Data source: [Population statistics of Eastern Europe](#)

According to censuses, the number of all major kin minorities in CEE decreased in the course of the two decades following the end of the Cold War: the number of self-declared Russian co-ethnics fell from 15.4 million to 12.5 million, the number of Ukrainian co-ethnics decreased from 5 million to under 1 million, and the Hungarian co-ethnics diminished from 2.7 million to 2.1 million. The same holds true for other significant ethnic minorities in the region, such as Germans (whose number decreased from 1.7 million to 0.8 million) and Tatars (whose number declined from 5.9 million to 5.6 million). The only significant increase occurred in the case of Romanian co-ethnics (from 0.5 million to 1.1 million) as a consequence of a massive re-identification of ‘Moldovans’ as ‘Romanians’ in the conflict-ridden Republic of Moldova (see Figure 11). Another notable increase is reported for the Roma, a minority without a kin state, whose number raised from 1.4 million to 1.9 million.

**Figure 11 – Evolution of co-ethnic populations in CEE**



Data source: [Population statistics of Eastern Europe](#)

The demographic evolution of the Roma has helped to reinforce co-ethnic citizenship policies in certain countries. For example, reports about the ‘abnormal’ reproduction rates of the Roma in Bulgaria and Romania fuelled nationalist fears about the ‘gypsisation’ of the countries and led to a renewed commitment to include co-ethnics in order to ensure ethno-demographic revival (Dumbrava 2016).

**Table 10 – Self-declared ethnic minorities in CEE**

	1990s	2000s
<b>Russians</b>	15,413,428	12,572,305
<b>Ukrainians</b>	5,067,222	991,300
<b>Hungarians</b>	2,700,471	2,125,468
<b>Armenians</b>	1,810,308	1,502,212
<b>Belarusians</b>	1,685,272	1,029,855
<b>Poles</b>	1,135,505	834,265
<b>Croats</b>	902,805	689,339
<b>Moldovans</b>	529,216	432,729
<b>Romanians</b>	517,519	1,155,317
<b>Bulgarians</b>	393,439	316,995
<b>Slovaks</b>	296,503	253,202
<b>Georgians</b>	260,030	202,519
<b>Lithuanians</b>	112,864	75,723
<b>Czechs</b>	79,461	45,214
<b>Slovenes</b>	32,093	18,173
<b>Latvians</b>	15,877	23,545
<b>Estonians</b>	10,163	22,097
<b>TOTAL</b>	30,962,176	22,290,258

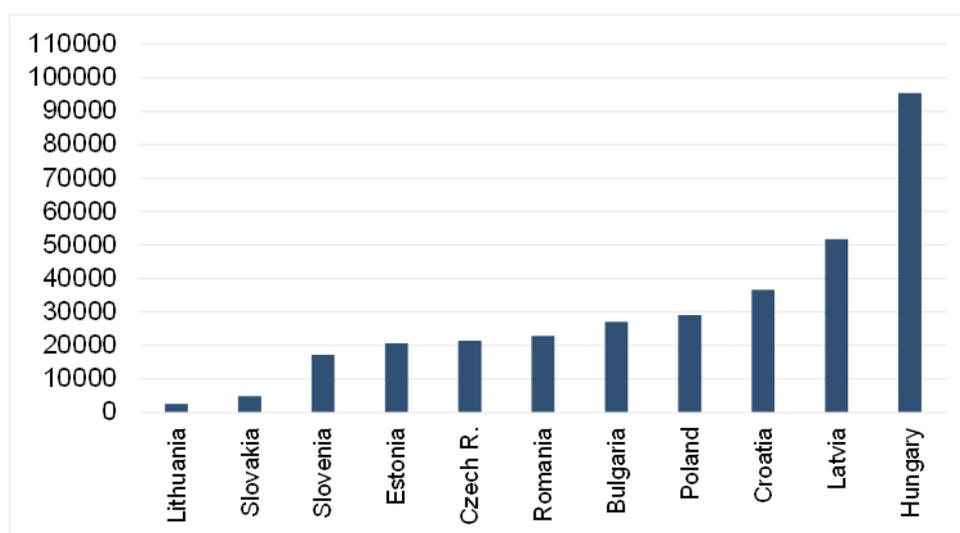
Data source: [Population statistics of Eastern Europe](#)

One should, of course, not overestimate the reliability and capacity of census data to capture ethnic affiliation, not least because the number of persons who did not or refused to declare ethnic affiliation in CEE countries rose dramatically from 2.6 million to 13 million between 1990s and 2000s.

According to Eurostat data, between 2006 and 2015, about 330,000 persons acquired citizenship in 11 CEE countries that are EU member states (see Figure 12). Almost one third of these acquisitions occurred in Hungary, particularly after the amendment of the Hungarian citizenship law in 2010, which made it easier for persons of Hungarian origin to acquire Hungarian citizenship. However, Eurostat data include only acquisitions of citizenship by people living in the country (ordinary naturalisation) and thus do not capture the full scale of citizenship acquisitions by co-ethnics, who often acquire citizenship from outside the country.

In many CEE countries preferential citizenship rules for co-ethnics constitute the primary channel of citizenship acquisition. About 1.1 million persons acquired Croatian citizenship between 1991 and 2006 on grounds of ethnicity, including 800,000 in Bosnia and Herzegovina, 100,000 in Serbia (and Montenegro) and 10,000 in Macedonia (Štiks 2012). About 600,000 persons are estimated to have obtained Hungarian citizenship on the basis of Hungarian origin between 2011 and 2014 (Bálint 2014), whereas about 230,000 persons re-acquired Romanian citizenship between 1991 and 2012 (Iordachi 2012). The potential for further acquisitions remains great in many cases. Bulgarian citizenship can be claimed by all ethnic Bulgarians who lived in the territories left outside the boundaries of the modern Bulgarian state, which includes about 2.5 million persons living in Macedonia and 235,000 people living in Ukraine and other smaller Bulgarian communities around the world. Most citizens of Moldova can claim preferential citizenship in Romania, while a great numbers of Romanian, Slovakian and Ukrainian citizens can acquire Hungarian citizenship.

**Figure 12 – Acquisitions of citizenship in 11 CEE countries (2006-2015)**



Data source: [Eurostat](#)

Given the cross-border character of ethnic diasporas in CEE, co-ethnic citizenship policies have often been greeted with resistance and suspicion by neighbouring countries. Russia's policy of handing passports to 'Russians' from the Georgian separatist region of South Ossetia is a blunt example of using citizenship as a tool of territorial revisionism. Softer policies of national reintegration through co-ethnic citizenship have also been contested by concerned states. The Hungarian-Slovak dispute over Hungary's policy of non-resident dual citizenship for Hungarian co-ethnics is a case in point. While accusing Hungary of revisionism and imperialism, the Slovak government amended its citizenship law in order to withdraw Slovak citizenship from those voluntarily acquiring another citizenship, in an attempt to dissuade Slovak citizens of Hungarian ethnicity from acquiring Hungarian citizenship (Bauböck 2010). The row intensified nationalist rhetoric in the region and threatened to destabilise diplomatic relations between several neighbouring states. When the massive distribution of passports abroad is accompanied by full political inclusion through external voting, co-ethnic citizenship policies may have disruptive effects on internal politics and may contribute to stirring nationalist antagonisms within and across countries.

## 5. Conclusions

Citizenship has been rediscovered in Central and Eastern Europe after the collapse of the communist regimes and the breakdown of multi-national states. This rediscovery came with great opportunities, with regard to democratic inclusion, national redefinition and remedying past wrongs, as well as with important risks, such as legal and political exclusion, ethnic engineering and discrimination. Citizenship laws of CEE countries follow a general European pattern with respect to the prevalence of provisions of *ius sanguinis* and to relatively easy formal requirements for naturalisation (e.g. residence). In an attempt to break with the past, a number of post-communist CEE countries have put in place strong constitutional protections against the deprivation of citizenship. The citizenship laws of CEE countries also include relatively strong legal standards for protection against statelessness.

Except for the (anomalous) case of Moldova, however, no CEE country has adopted provisions on *ius soli* citizenship. The acceptance of dual citizenship is also less widespread in CEE than in other parts of Europe. Debates about dual citizenship in the region are strongly linked with the issue of co-ethnics living outside borders. In line with different projects of national consolidation, states either promote or reject dual citizenship. While not strictly confined to CEE, policies of preferential access to citizenship for co-ethnics constitute a key feature of many citizenship policies of these countries. In many cases, the overwhelming majority of citizenship acquisitions are made through such preferential channels, while the potential for further acquisitions remains significant.

The arrival in Europe of more than 1 million refugees and immigrants in 2015 alone is set to affect, in the long run, the citizenship regimes of European countries. Due to their geographical proximity to the conflict zones, the CEE countries have been frontline countries that had to deal with the inflows of refugees. These countries have relatively little experience with immigration and their citizenship policies are not fully equipped to cope with significant numbers of immigrants and refugees.

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