

EUDO CITIZENSHIP OBSERVATORY

NATURALISATION PROCEDURES FOR IMMIGRANTS MACEDONIA

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European University Institute, Florence
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Naturalisation Procedures for Immigrants

Macedonia

Biljana Ristova

1. Introduction

The idea of this report is to present how ordinary naturalisation provisions are implemented in Macedonia and whether different practices apply for a different category of applicants. For this purpose, the political context and developments within this new country also need to be taken into consideration.

After announcing its independence from the Socialist Federal Republic of Yugoslavia (SFR Yugoslavia) in 1991, Macedonia provided a transitional timeframe of one year for its residents with citizenship from the other successor-states of SFR Yugoslavia to apply for acquiring Macedonian citizenship, provided that they were adults who had fulfilled cumulative residence requirement of fifteen years and had a permanent source of income. This provision received serious criticism from minority groups due to the fact that many Albanians and Roma had to reapply through ordinary naturalisation, despite the fact that they had resided in Macedonia for many years but lacked a proof of residence registration or information on this possibility (Spaskovska 2010:10). This solution was seen at the time as a way of controlling migrations that had taken place within the SFR Yugoslavia, and particularly of ethnic Albanians from Kosovo (Balalovska and Ragazzi 2011:17). After this deadline a large number¹ of residents found themselves in a legal vacuum, in that they became stateless persons (Imeri 2006:203).

In the spirit of the *Ohrid Framework Agreement*,² the Macedonian Parliament in 2004 adopted Citizenship Law Amendments. With these amendments a second ‘window of opportunity’ for ‘long-term residents with unregulated status’ was opened. The adult citizens of the other republics of the former SFR Yugoslavia who on 8 September 1991 had a registered residence and until the filing of the request had permanently resided on the territory of Macedonia and had a real and effective bond with Macedonia were eligible for acquisition of Macedonian citizenship. Additionally, the applicant had to prove that a criminal procedure concerning the security and defence of the Republic of Macedonia was not initiated against them and that language requirements were fulfilled. This ‘second transitional period’ for the former SFR Yugoslavia citizens was primarily aimed at resolving the pending cases of unregulated citizenships of mostly Roma and Albanian residents, who previously failed to prove the cumulative residence requirement of fifteen years (Spaskovska 2010:14). However, none of these legal measures have fully solved the status of the so-called ‘habitual residents’ from the Roma community in Macedonia.³ Although this group had equal legal treatment, they did not acquire ‘legal existence’, primarily for not having valid documents. The Citizenship Law amendment from 2008 was aimed at facilitating the naturalisation procedure

¹ This number according to the UNHCR statistics was 2,130 persons.

² Framework Agreement concluded at Ohrid on 13 August 2001 that ended the armed conflict between the Albanian radicals and Macedonian Government.

³ According to UNHCR statistics 1,154 stateless persons reside in Macedonia. Although it is known that most of them are from Roma population, the exact number is not a public information.

only for refugees and stateless persons, as a final stage in the process of resolving the legal status of mainly Albanian and Roma refugees from the 1999 Kosovo crisis.

From 1993 to 2008, 98,990 persons acquired Macedonian citizenship. More than four fifths (88.6 per cent or 87,740 persons) of those used to be citizens of the former SFRY or some of its republics. In addition, 60,585 of those persons acquired citizenship on the bases of naturalisation, in accordance with the two ‘transitional provisions’ envisaged only for this category of people who had lived in Macedonia before the succession and continued to live there after Independence.⁴

From an economic point of view, Macedonia is a country where average economic growth in 2011 was 3 per cent, the average monthly salary was 500 Euros and the unemployment rate in the IVth quarter of 2011 was 31.8 per cent.⁵ Therefore, judging by economic parameters mostly, it is to be expected that a country like Macedonia does not have a frequent practice of accepting foreigners through ordinary naturalisation. To be exact, as stated in the *Resolution of Migration Policy in Macedonia*, by 2008, only 4,392 residents have acquired Macedonian citizenship through ordinary naturalisation.⁶

What all of the abovementioned implies is that ordinary naturalisation has never been a high priority on the political agenda; most of the government’s efforts and the debate within the NGO sector have been focused on promoting modes for resolving the status of the refugees from the Kosovo crisis, stateless persons, long-term residents with citizenship from the other successor-states of SFR Yugoslavia and of the so-called ‘habitual residents’ from the Roma Community.

For these reasons, research is limited by the availability of reports and data made public, and it is based on in-depth analysis of law and by-law acts, officials’ reports and academic research that do not refer exclusively to ordinary naturalisation, but analyze it as one of the possible modes for acquiring Macedonian citizenship.

2. Promoting Macedonian Nationality

Following the signing of the *Ohrid Framework Agreement* in 2001 and the ratification of the *European Convention on Nationality* in 2003, the most significant amendments on the Law on Citizenship were adopted in 2004. The amendments had aimed primarily at ensuring full consistency with the Convention and overcoming the drawbacks identified during the implementation of the Law. With the respective amendments, key requirements for ordinary naturalisation were facilitated,⁷ specific requirements for recognized refugees and stateless persons were introduced⁸ and a new transitional deadline was given for the former citizens of SFR Yugoslavia that reside on the territory of Macedonia.

In order to facilitate the process and to avoid the initial mistake of not properly informing the potential applicants, in December 2004, the Macedonian Government in coordination with the Representation of the UNHCR launched a widespread information campaign (Spaskovska 2010: 14). The respective campaign promoted all modes for

⁴ Resolution of Migration Policy in Macedonia 2009-2014 (2008). Skopje: Government of Republic of Macedonia, p.24.

⁵ Quarterly Economic Report Q4 2011 (2011). Skopje: Ministry of Finance.

⁶ The number of rejected applications is not made public.

⁷ Residence requirement was decreased from fifteen to eight years, while the requirement for sound physical and mental state was abandoned.

⁸ Before the 2004 amendments, no specific legal provisions were included for refugees and stateless persons.

acquisition of Macedonian citizenship (*ius sanguinis*, *ius soli* and naturalisation), set in the Law on Citizenship.

The campaign especially targeted the Roma and the Albanian population for the amendments and the extended transitional deadline for regulation of their status in accordance with the provisions of the 2004 amendments. The campaign included broadcasts on a number of radio stations, as well as video and TV spots in different languages (Imeri 2006:2004). More importantly, the campaign released a Citizenship Brochure in the languages of the communities that live on the territory of Macedonia and in English as well. This Citizenship Brochure⁹ gives an insight into how Macedonian citizenship can be acquired, through listing the requirements written in simplified language, as well as mandatory documents. Starting from 2004, the respective brochure has been continuously published and distributed by UNHCR and the Ministry of Interior (MOI).

After the end of the campaign, the MOI has provided a link on its web page,¹⁰ where citizenship application form and a list of the mandatory documents for acquiring Macedonian citizenship through different modes of acquisition can be found. Even more encouraging is that the most influential webpage www.uslugi.gov.mk has a link¹¹ to extensive information regarding different modes of acquisition of Macedonian citizenship.

Accessing and submitting the citizenship application is relatively easy, since they are officially distributed through the Ministry of Interior's Office in each municipality, and can be submitted at the Office of the MOI according to the applicant's place of residence. Electronic submission through online access is still not an option.

The administrative fee initially paid is in the amount of twenty Euros for the application,¹² and if the authorities reach a positive decision, at the end of the procedure the administrative fee amounts to 80 Euros. The applicant has the right to be exempted from payment of the administrative fees, provided that the only source of income in his/her household is a permanent pecuniary aid or pecuniary welfare given by the state. This exemption is not at the authority's discretion, but a legal incentive for this particular group set in the Law on Administrative Fees.¹³

In the end, it must be stressed that bearing in mind the complexity of the naturalisation procedure, despite the above stated promotional activities, a more interactive approach between the authorities and the applicants is required. Since there are no counselling services specifically for naturalisation applicants, the MOI should work on developing the capabilities of its employees for providing information on the citizenship application status, detailed justification for the rejection, and also pointing out the applicants' right to apply for Macedonian citizenship under other grounds stipulated in the Law on Citizenship (if eligible).

⁹ Citizenship Brochure (2008). Skopje: UNHCR and Ministry of the Interior.

<http://www.uslugi.gov.mk/UslugaOpis.aspx?UslugaID=3fb49fa3-d009-405d-ae77-c9ff2102ce3e>

¹⁰ Ministry of the Interior, <http://www.moi.gov.mk/DesktopDefault.aspx?tabindex=0&tabid=432>

¹¹ Governmental webpage,

<http://www.uslugi.gov.mk/UslugaDetali.aspx?UslugaID=3FB49FA3D009405DAE77C9FF2102CE3E>

¹² Granting naturalisation on a person includes extension of the process of ones minors, only if they are included in the application file and no additional administrative fee has to be paid.

¹³ Закон за судските такси [Law on Administrative Fees]. Службен весник на Република Македонија [Official Gazette of the Republic of Macedonia], 17/93-84/12.

3. Documenting the Citizenship Application

In the process of acquiring Macedonian citizenship through ordinary naturalisation, most of the documentation is provided personally by the applicant. Few of the criteria listed in the ordinary naturalisation article in the Law on Citizenship are assessed on the basis of documents obtained *ex officio*.

In addition to the citizenship application, the applicant has to submit the following documentation:

1. Short biography and identification document¹⁴ (residence permit or a travel document issued by the country of origin).
2. Birth/Marriage certificate. In the case of a birth/marriage certificate issued by another country, it needs to be issued in an internationally accepted format or translated by a certified translator.
3. Confirmation of employment or ‘document’ demonstrating the existence of another source of income.¹⁵ The assertion of this requirement with the phrase ‘other document’ is a very vague approach since it is not clearly specified what type of document can be actually used. There is no indicative list of documents¹⁶ that can be presented (Imeri 2006: 205).
4. ‘Housing requirement’ can be easily established by one the following indicative list of documents:
 - Sale/Purchase Agreement;
 - Lease;
 - Property Deed;
 - Tax payer document (unlawful construction) and etc.
5. Certificate that no criminal proceedings have been instituted against the applicant in Macedonia (issued by the responsible first instance court in Macedonia) and in the country of origin (issued by the responsible authority in the particular country).
6. Certified copy of the criminal records (issued by the country of origin).

With the Citizenship Law amendments from 2004, the obligation to prove a sound physical and mental state was fully abandoned. This requirement was very often criticized by a number of states and international organizations, particularly by the European Commission against Racism and Intolerance (Imeri 2006:196).

Within the process of establishing compliance with the criteria stipulated under the Law on Citizenship, the competent Department for Citizenship within the MOI cooperates with Security and Counter Intelligence (responsible for security and defence checks), the Department for Foreigners (evaluation of the residence criteria), and the Department for Analytics (to determine whether the applicant was sentenced to imprisonment in Macedonia). At the same time, the Language Evaluation Commission is informed that the applicant has to take the language test. All the previously mentioned departments within the MOI, as well as the Language Evaluation Commission send information on the final outcome of their proceedings directly to the Department for Citizenship.

Provided that on the basis of the above specified documents and checks it is established that the applicant meets all the naturalisation requirements, a guarantee is issued

¹⁴ This document needs to be presented only, it is not kept by the authority.

¹⁵ The amount of the incomes must be stated.

¹⁶ For example notarized statement by the registered partner/spouse or other close family member.

that the applicant will acquire Macedonian citizenship.¹⁷ It is important to emphasize that granting Macedonian citizenship was not set as an explicit legal entitlement for the applicants that met the requirements before the 2004 amendments. After receiving the guarantee, the applicant is obliged within a time period of two years to submit a proof of renunciation or a proof that once the applicant acquires Macedonian citizenship the foreign one will be lost. If the foreign country does not provide the renunciation or in order to give renunciation it stipulates conditions that could cause existential or security problems for the applicant and/or his family, the applicant must give a statement that he/she renounces the foreign citizenship.

Although the above stated documents are quite clearly identified from the beginning of the naturalisation procedure, the discretion of the authorities arises if the applicant is not in a position to obtain the documents from his/her country of origin. Alternative methods in cases where the applicant is not in a position to obtain the requested documents (due to armed conflict, economic reasons, system deficiencies, etc.) have never been prescribed in the Law on Citizenship or in the Citizenship Brochure. In practice, this mostly affected stateless persons¹⁸ and refugees who were also obliged to submit documents from their country of origin. After the Citizenship Law amendments from 2008 this category of applicants is exempted from the obligation to submit documents from their country of origin. These amendments specifically targeted Kosovo refugees since they abolished the requirement for renunciation from the last (in this case Serbian) citizenship and for not being prosecuted in the country of origin, as a number of Kosovo Albanians had criminal charges pressed against them in Serbia (Spaskovska 2010:15).

4. Discretionary Power of the Administration

Even though the Law on Citizenship defines ordinary naturalisation as a legal entitlement of the applicant who fulfils specific criteria, discretion can be exercised, especially in the assessment of the following criteria: national security or defence, language proficiency, and renunciation.

Security and defence criteria seem to be the most sensitive requirements that could postpone the naturalisation procedure for months, in some cases even for years, and where the authority's discretionary powers become most evident. Growing concerns about the security of this relatively new state, where armed conflict took place in 2001, might result in negative stereotyping of the applicants that, according to their ethnicity, belong to the group that was part of the conflict. The Law on Citizenship from 1992 clearly stated that the MOI should not explain the reasons for passing a negative decision on this ground.

The amendments from 2004 are the most important progress regarding the need for avoiding the discretionary power of the authorities concerning this criterion and making the process more transparent. In compliance with Article 11 from the *European Convention on Nationality*, on the basis of the adopted amendments, the MOI is obliged to state the reasons that led to rejection, at the same time taking into consideration the protection of the public interest.

¹⁷ Закон за изменување и дополнување на Законот за државјанство на Република Македонија [Amendments on the Law on Citizenship of Republic of Macedonia]. Службен весник на Република Македонија [Official Gazette of the Republic of Macedonia], 8/04.

¹⁸ Although the Law on Citizenship provides for facilitated access to naturalisation for stateless persons, specific statelessness determination procedure has not yet been established.

Statistical data indicate that until 2004 most of the citizenship applications were rejected on these grounds. After the introduced amendments it can be established that the highest rejection rate does not come from these criteria (Imeri 2006:205). After 2004 most citizenship applications were rejected due to the fact that the applicants failed to prove their legal and continuous residence on the territory of Macedonia.¹⁹

The Law on Citizenship clearly stipulates that the applicant must legally and continuously reside on the territory of Macedonia for at least eight years.²⁰ The different administrative practices in the evaluation of this criterion are not noted, but the prior procedure for granting residence permits might be a subject of concern. Namely, the Ombudsman has recorded cases when the Department for Foreigners fails to respect the procedure for granting foreigners' residence permits established in the Law on Foreigners.²¹

The language requirement is an additional criterion where a risk of subjective evaluation may arise. There are neither quality-certified preparatory courses designed specifically for applicants, nor materials for self-directed learning adapted to meet the applicants' needs. Furthermore, in the process of ordinary naturalisation, no legal possibility is set for the applicants to prove their language proficiency only by a presentation of certain certificates. The evaluation of this requirement is performed by a Language Evaluation Commission (established by the Government), in the form of an 'informal' interview, while the methodology for drafting the questions is not set in an official act.

According to the Law on Citizenship, the applicant must have command of the Macedonian language to the level that he/she can easily communicate with the environment'. With the amendments from 2004, the phrase 'to the level that he can easily communicate with the environment' was added. This amendment was due to the vagueness of the provision from the previous Law where it was only generally stipulated 'to have command of the Macedonian language', which turned out to be too extensive a criterion in practice (Imeri 2006: 197).

One of the major findings regarding this requirement is that the system does not stipulate exemptions in favour of vulnerable applicants (old people, mentally or physically disabled), for which this test could be a real obstacle.²²

Since the Law on Citizenship does not tolerate dual citizenship, renunciation of the former citizenship is compulsory. The exemption from this requirement is allowed if:

1. the foreign country does not allow renunciation or
2. in order to allow renunciation it stipulates conditions that could cause existential or security problems for the applicant and/or his family.

It is unclear how the applicant can demonstrate that the particular country stipulates conditions that could cause serious problems for the applicant or his/her family, and which conditions permit this treatment as such (high fees, armed conflict, long renunciation procedure, impossibility to obtain documents, inheritance, property rights, etc.).

¹⁹ Информација на МВР за стекнување на државјанство [MOI Information for the process of acquisition of the Macedonian citizenship], Lobi [Daily on line newspaper], 2006. <http://www.pressonline.com.mk/default-al.asp?ItemID=6F2B1022A040974DAC8122B63E2E6791>

²⁰ This period of eight years is one of the crucial amendments introduced in 2004, in the spirit of the European Convention on Nationality and in accordance with the recommendations of the European Commission against Racism and Intolerance (ECRI) (previously it was fifteen years).

²¹ Annual Report (2010). Skopje: Republic of Macedonia Ombudsman.

²² Annual Report (2008). Skopje: Republic of Macedonia Ombudsman.

The Law on Citizenship and the Citizenship Brochure do not lay out any alternative modes to prove the applicant's identity in the naturalisation procedure. It must be stressed that only a previous procedure for residence regulation, the Law on Foreigners,²³ stipulates the procedure for foreigner's identity confirmation.

Concerning the criminal record requirement, the Law on Citizenship implies that the applicant must not be sentenced to imprisonment for at least one year in Macedonia, or in the state whose citizen he is for crimes prosecuted *ex officio*, which are punishable in accordance with the regulations in Macedonia.

Pursuant to the Law on Citizenship, the applicant has to present a permanent source of income. The amendments from 2004 clarified that the income must be 'in the amount enabling material and social security in accordance with the requirements determined by law'. In practice, however, another question arises: which is the threshold of the amount stipulated in this provision? Due to the fact that the applicant who receives a permanent pecuniary aid or pecuniary welfare provided by the state is eligible to apply for ordinary naturalisation, the amount of this aid/welfare is the threshold used as an indicator for this requirement.

5. Bureaucracy

The naturalisation procedure begins with submitting the citizenship application to the Office of the MOI according to the applicant's place of residence. Firstly, a completeness and eligibility check on the application file is performed by the Department for Citizenship. In general, the documents are required only once at the beginning of the procedure. If during the first eligibility and completeness check it is established that all specified documents are not supplied with the application, the MOI sends an Information Letter to the applicant, asking for submission of the missing document or to request clarification of the already submitted one. All official correspondence between the Department for Citizenship and the applicant is in written form, delivered in person. This system of personal delivery involves delays of more than six months and contributes to the inefficiency of the system for prompt response of the citizenship applications (Imeri 2006: 205). Even more worrying is that the Law on Citizenship has not specified the time limit for processing the citizenship application as a guarantee for the applicants. Although on the relevant webpage www.uslugi.gov.mk, a six months period is indicated as an average period for passing a decision, it usually takes longer, in most cases as a result of security checks (Imeri 2006: 197).

In the naturalisation procedure, all decisions (whether positive or negative) are passed by one central authority, the Minister of the Interior, who is entitled to delegate this responsibly to a civil servant within the MOI who holds a managerial position.²⁴ This legal entitlement has been followed by all Ministers of Interior since 1992 (except for the period of the armed conflict 2001-2002).

The applicant formally becomes a Macedonian citizen by the act of personal delivering of the decision for acquisition, in the premises of the MOI. Before that, the applicant is obliged to sign a 'loyalty oath'.²⁵ The process of signing the 'loyalty oath' and conferring the Macedonian citizenship is a standard bureaucratic affair, and it does not include any welcoming ceremonies or public involvement.

²³ Закон за странците [Law on Foreigners]. Службен весник на Република Македонија [Official Gazette of the Republic of Macedonia]. 35/06-84/12.

²⁴ Закон за општата управна постапка [Law on the General Administrative Procedure]. Службен весник на Република Македонија [Official Gazette of the Republic of Macedonia]. 38/05,110/08, 51/11.

²⁵ This is a novelty introduced with Citizenship Law amendments from 2004.

6. Review on the decision-making process

The obligation for all state authorities to fully justify their decisions especially the negative one,²⁶ is intended to render the decision-making process transparent. However, with regard to the naturalisation procedure, there are deficits in practice. Namely, most of the decisions of rejection are not explained fairly, in the sense that the reasons that lead to rejection are only generally stated without going into further details (Imeri 2006:205). Thus, the applicant is placed in a very difficult position to judicially challenge the reason for rejection.

Until the end of 2011, the unsatisfied party had a right to appeal the negative decision, in front of a governmental Second Instance Commission.²⁷ If the Commission confirmed the MOI decision, the applicant would be entitled to bring the case in front of the Supreme Court. Following the Citizenship Law amendments from 2011, the Second Instance Commission was dismissed, and at this point the unsatisfied party has the right to launch a law suit directly in front of the Administrative Court (specialized for administrative disputes).²⁸ Upon the initiated administrative dispute, the Court has the possibility either to decide on the lawfulness of the decision or to decide on its merit.²⁹

Even though the Administrative Court has a legal entitlement to decide on its merits, the option to annul the negative decision as unlawful and to return the citizenship application for a fresh consideration at the first instance again (MOI), by giving strict directions for further proceeding, is more likely to be applied. From the publicly available online archive of the Supreme Court (that was later replaced by the Administrative Court) only one decision was recorded where this Court had decided on a case concerning Macedonian citizenship.³⁰

7. Conclusions

This paper has covered relevant citizenship issues in Macedonia that do not refer to ordinary naturalisation exclusively. This is due to the fact that the major Citizenship Law amendments were primary targeted at resolving the status of the stateless persons and refugees from Kosovo crisis and the so-called ‘long-term residents’ from SFR Yugoslavia, while ordinary naturalisation has never been a high priority on the political agenda.

Since there are no ongoing public debates or NGOs whose central focus is ordinary naturalisation and the recent authorities’ efforts have focused on researching other citizenship-related issues,³¹ it is very difficult to locate a proper method for gaining an ‘insight’ into how ordinary naturalisation is implemented in practice. From an in-depth analysis of the Citizenship Law and its amendments, Ombudsman’s reports and the available academic research it can be concluded that the most significant reforms concerning ordinary naturalisation occurred in 2004, in the so-called ‘post-2001 period’, under the influence of the

²⁶ Закон за општата управна постапка [Law on the General Administrative Procedure]. Службен весник на Република Македонија [Official Gazette of the Republic of Macedonia]. 38/05,110/08, 51/11.

²⁷ not specialized on issues regarding citizenship exclusively.

²⁸ Закон за изменување на Законот за државјанство [Amendments on the Law on Citizenship of Republic of Macedonia]. Службен весник на Република Македонија [Official Gazette of the Republic of Macedonia]. 158/11.

²⁹ Закон за управните спорови [Law on the Administrative Disputes]. Службен весник на Република Македонија [Official Gazette of the Republic of Macedonia], 62/06.

³⁰ Документи од судската практика (Legal Practice Document), Supreme Court of the Republic of Macedonia. <<http://www.sud.mk/VsUD/WWWVsud.nsf?OpenDatabase>

³¹ Repatriation, civil registration of the Roma population and up-date of the Electoral register.

Ohrid Framework Agreement and were primary aimed at ensuring consistency with the *European Convention on Nationality*.

The findings indicate that although ordinary naturalisation is defined as a legal entitlement, discretion can be exercised during the assessment of certain criteria. The assessment on the language proficiency during an informal interview is one of them. Hence, a methodology for drafting the questions and precise criteria for the required level of proficiency must be set out in an official act. Moreover, the possibility for the applicant to prove this criterion by presentation of certain certificates should be specified, while vulnerable categories (old people, mentally or physically disabled) should be exempt from this requirement.

Regarding the exemption from the renunciation criteria, it is unclear how the authorities establish that the country of origin stipulates unacceptable conditions for renunciation and which conditions qualify for this treatment. Therefore, these unacceptable conditions should be indicatively listed in publicly available and binding guidelines.

Security and defence checks still remain one of the main concerns. The requirement for the authority to state the reasons due to which the negative decision has been adopted, taking into consideration the protection of the public interest, leads to many situations when the authority only generally states the negative decisions, without providing any justification, claiming that it is due to protection of the public interest.

The MOI should commit to develop the skills of its employees for providing detailed justification for any negative decision. Also, since there are no counselling services for naturalisation applicants, the employees should devote sufficient time for providing up-to-date information on the status of the application or giving directions for further proceedings. This refers especially to the cases when the applicant is not in a position to obtain the requested documents. Providing the documents from the country of origin is a time-consuming and costly process, and sometimes it is impossible to obtain the documents. Neither the Law on Citizenship, nor the Citizenship Brochure prescribe alternative measures for proceeding in cases where the applicant is not in a position to obtain the requested documents. Consequently, the opportunity arises for the administration to work with applicants on a case-by-case basis, thus opening a window for a subjective assessment. For that reason, guidelines with recommendations how authorities should proceed in such cases must be provided.

In the end, it must be emphasized that the time limits for passing the decision should be introduced in the Law on Citizenship as a guarantee for the applicant and benchmark for administration efficiency.

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