

RSC 2021/90
Robert Schuman Centre for Advanced Studies
Global Governance Programme-457
GLOBALCIT

WORKING PAPER

**Modes of acquisition and loss of citizenship
around the world**
Comparative typology and main patterns in 2020

Luuk van der Baaren and Maarten Vink

European University Institute

Robert Schuman Centre for Advanced Studies

Global Governance Programme

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RSC Working Paper 2021/90

ISSN 1028-3625

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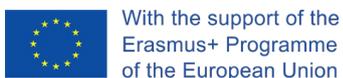
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Published in December 2021 by the European University Institute.
Badia Fiesolana, via dei Roccettini 9
I – 50014 San Domenico di Fiesole (FI)
Italy
www.eui.eu

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Abstract

This Working Paper introduces the new GLOBALCIT Citizenship Law Dataset, by discussing the systematised comparative typology of modes of acquisition and loss of citizenship in the new Dataset and describing the main patterns observed around the world in 2020. The GLOBALCIT Citizenship Law Dataset integrates, systematises and updates information previously included in two online GLOBALCIT datasets. The Dataset includes information on the different ways in which citizenship can be acquired and lost across the world in 190 states. It is organized around a comprehensive typology of 26 modes of acquisition and 15 modes of loss of citizenship, which outlines, in a systematic way, the various ways in which citizenship can be acquired and lost. For each 'mode of acquisition' the typology outlines a standardised 'target person' which allows comparing rules applicable to similar groups across states. To facilitate comparison, the entries for each mode have been categorised in standardised categories and a more elaborate specification of the legal conditions is provided for each entry. The Dataset seeks to provide a global outlook on the current state of citizenship law and is designed for use across academic disciplines. The aim of the paper is twofold, namely a) to outline the development and methodological foundations of the new Dataset, and b) to demonstrate its potential use by highlighting the main patterns that can be observed based on the updated and systematised data.

Keywords

5 Global Citizenship, 5A GLOBALCIT, Citizenship.

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1. Introducing a new dataset¹

This Working Paper introduces the new GLOBALCIT Citizenship Law Dataset (Vink et al 2021a), by discussing the systematisation of the comparative typology of modes of acquisition and loss of citizenship in the new Dataset and describing the main patterns observed around the world in 2020. The aim of the paper is twofold, namely a) to outline the development and methodological foundations of the new Dataset, and b) to demonstrate its potential use by highlighting the main patterns that can be observed based on the updated and systematised data.

The GLOBALCIT Citizenship Law Dataset integrates, systematises and updates information previously included in two online GLOBALCIT datasets. The Dataset includes information on the different ways in which citizenship can be acquired and lost across the world in 190 states. It is organized around a comprehensive typology of 26 modes of acquisition and 15 modes of loss of citizenship, which outlines, in a systematic way, the various ways in which citizenship can be acquired and lost. For each 'mode of acquisition' the typology outlines a standardised 'target person' which allows comparing rules applicable to similar groups across states. To facilitate comparison, the entries for each mode have been categorised in standardised categories and a more elaborate specification of the legal conditions is provided for each entry. The Dataset seeks to provide a global outlook on the current state of citizenship law and is designed for use across academic disciplines.

The Dataset is descriptive in nature, as it categorises legal provisions on the acquisition of loss and citizenship and captures their main categorical distinctions. It therefore differs from the GLOBALCIT Citizenship Law Indicators (CITLAW) indicators, which aim to measure the degree of inclusiveness of provisions on an ordinal scale (Jeffers et al 2017). The GLOBALCIT Global Birthright Indicators take a similar ordinal approach towards provisions for acquisition of citizenship *iure sanguinis* and *iure soli* at birth (Honohan et al 2017).

2. Comparative typology

2.1 Comparing citizenship laws on a global level

The earliest attempts to apply a comparative perspective to citizenship law can be traced back to scholars in the field of private international law or public international law, who used a legal comparative methodology in order to develop a general theory of citizenship law, to determine general principles of citizenship law and the prevailing state practices, or to study conflicts of laws in the realm of international private law (e.g. Zeballos 1916; Weiss 1928; Panhuys 1959; Quadri 1936; Makarov 1949; Weis 1956). These studies predominantly focused on a relatively small set of states, and often conducted comparisons in order to juxtapose different legal traditions. While citizenship is still largely studied through single country studies or (regional) small n-studies, the number of comparative large n-studies has steadily increased. This includes studies covering a relatively large range of countries on a regional level (e.g. Dutoit 1973-1980; De Groot 1989; Jones-Corea 2001; Weil 2001; Manby 2009; Manby 2018; Vonk 2015; Acosta 2018; Vonk 2018) as well as studies on a global level (Waldrauch and Hofinger

¹ We thank Rainer Bauböck for constructive comments on an earlier draft of this paper. We also acknowledge contributions from Iseult Honohan and Bronwen Manby who, as co-authors of the GLOBALCIT Citizenship Law Dataset, have generously shared their expertise and thoughts with us on comparing citizenship laws globally during the construction of the Dataset.

1997; Koopmans et al 2005; Boll 2007; Brønsted Sejersen 2008; MPG 2006; Helbling 2008; Howard 2009; Janoski 2010; Vink et al 2019).

An important methodological development in this regard is the emergence of the functional comparative legal method. In short, the functional comparative method uses a law's 'function' as a starting point for comparative purposes by determining the function of a specific legal provision in order to compare it with functionally equivalent provisions, i.e. those citizenship law provisions with a similar function, from one legal context to another, typically another state (Zweigert and Kötz 1998; Samuel 2014; Van Hoecke 2015; Gordley 2012; Michaels 2019). By using a provision's function as a starting point, the functional comparative approach can overcome the hurdles posed by the structural dissimilarities of different legal systems. After all, even if there are no provisions with an exactly or nearly similar phrasing (in translation) between two legal systems, differently worded provisions can nevertheless represent functionally equivalent legal provisions provision.

Applying the functional comparative legal method requires one to answer two preliminary questions. Firstly, one must determine what the *tertium comparationis* is, or the common comparative denominator (Örücü 2012: p. 561). This can be a common function or objective, or, in other words, a common 'problem' (ibid.). We adhere to the definition of the term 'citizenship' as set forth in the GLOBALCIT Glossary on Citizenship and Electoral Rights, namely a legal status and relation between an individual and a state or other territorial polity (such as the European Union, a federal province, or only partially recognised states) that entails specific legal rights and duties (GLOBALCIT 2020: p. 8 & 17). This definition merges traditional legal-theoretical communitarian perspectives as well as individualistic perspectives on citizenship, as it defines citizenship as a communitarian bond or relation as well as an individual status (Makarov 1949; cf. Weiss 1928 and Valéry 1914). This understanding of citizenship also establishes the core function of citizenship, namely that citizenship entails specific legal rights and duties (De Groot 1989: p. 13). This definition raises the question of the boundaries of citizenship and whether such notion could also cover other (residency or extraterritorial) statuses, considering that these can perform similar functions. The conceptual distinction between citizenship status and other (residency) statuses has been problematized in scholarship, for example in the context of electoral rights, as a share of states grant (partial) electoral rights to non-citizens as well (Schmid, Arrighi and Bauböck 2019). The distinction is further challenged by the emergence of 'quasi-citizenship' statuses, which closely resemble citizenship regarding the rights and duties these statuses provide (Luk 2018). While such studies question the delimitation of citizenship and the dichotomy between citizenship and other personal statuses, we maintain that citizenship should be studied autonomously, as it remains universally recognised by states as a supreme personal status that is enshrined in and protected under international law (De Groot and Vonk 2016; Boll 2007; Weis 1954).

Although this conceptual definition is helpful, the 'problem' to be analysed here is far more specific, namely to define the precise ways in which citizenship can be acquired or lost by certain groups of people. As citizenship can be acquired or lost in many different ways, it is necessary to define a multitude of *tertium comparationis*. For this purpose, we build on a typology of modes of acquisition and loss of citizenship that has been developed in the early 2000s (Waldrauch 2006a), which has been further adapted and extended (see Section 2.2.1). For each of the modes, this typology specifies which 'target person' it addresses. These functional definitions aim to be sufficiently generic in order to capture a broad range of relevant provisions in citizenship, but also sufficiently specific in order to prevent the categorisations from becoming essentially meaningless. The modes can be further divided into clusters of modes that are complementary to each other. For example, mode A02a captures *ius soli* provisions (aimed at children born in the country), while mode A02b captures double *ius soli* provisions

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(aimed at children born in the country to a parent who was also born in the country). Even though the latter category is far more restrictive than the other, both categories of provisions aim to facilitate the acquisition of citizenship at birth by children of noncitizens, and these can therefore be studied together.

A second preliminary question is what one considers as 'law', or where the boundaries between the legal and the extralegal should be drawn. Comparative law scholars often argue that a broad definition of law should be utilised in this context in order to capture "the living law in books and in action". Some scholars claim that this is even essential in comparative legal studies, as a phenomenon that is enshrined in law in one state might appear in a different form in another state. For example, it might appear in customs instead of codified law, or in a task that has been 'outsourced' to non-state third parties. We contend that these concerns are of limited relevance for comparative study of citizenship. Firstly, while states have historically used a plethora of arrangements for delineating their permanent populations, citizenship has now become a universal status (Hailbronner 2006). Secondly, while until recently not all states had enacted legislation on citizenship status (e.g. the People's Republic of China before 1980 and Mongolia before 1987), this is nowadays the case for all 190 states that have been included in the 2020 version of the Dataset. All states have therefore enshrined the grounds for acquisition and loss of citizenship in law, which enables us to compare these legislative provisions. An important caveat in this regard is that this focus on written law neglects extralegal arrangements or deviant policy practices, as well as issues regarding implementation. While we aim to incorporate such practices in future versions of the Dataset, we currently do not take these aspects into account due to the challenge of defining comparative criteria for the implementation of legal provisions and of gathering relevant data.

The functional comparative method has frequently been criticised for its praesumptio similitudinis, or the assumption that each society faces similar challenges, and that each legal concept therefore has a functional equivalent in all other states (Michaels 2019; Poldnikov 2018; Samuel 2014; Örucü 2012). This presumption arguably implies a Eurocentric bias, as it advances the comparison of legal concepts that are prevalent in the best known legal systems. This criticism is applicable to comparative research on citizenship only to a very limited extent due to the present-day universality of citizenship. This universality facilitates and justifies carrying out global comparative analysis.

2.2 Modes of acquisition and loss of citizenship

2.2.1 The idea of comparable 'modes'

As was made clear above, citizenship laws often use different terms for similar rules. Comparing legal provisions on acquisition and loss of citizenship requires therefore a standardisation of terms and definitions. The database is organised around a comprehensive typology of modes of acquisition and loss of citizenship, which outlines systematically ways in which citizenship can be acquired and lost. For each mode of acquisition or loss of citizenship the typology outlines a standardised 'target person' which allows the comparison of rules applicable to similar groups across countries. In this way, the database aims to strike a balance between comparability and idiosyncrasy: by, on the one hand, pre-defining comparable target groups, as well as the main conditions and procedures, for the acquisition and loss of citizenship; while on the other hand leaving room for country-specific information.

The GLOBALCIT Citizenship Law Dataset 2020 builds on the ground-breaking work of the NATAC project (The Acquisition and Loss of Nationality in EU Member States, see Bauböck 2006) as well as the previous versions of the GLOBALCIT database. The NATAC project's aim

was threefold, namely to provide a thorough comparative description of all modes of acquisition and loss of citizenship, to describe trends concerning the acquisition and loss of citizenship, and to detect groups or types of states regarding their approach to citizenship. The project developed a comparative typology (Waldrauch 2006a) of 27 modes of acquisition of citizenship and 15 modes of loss of citizenship.

The methodological approach that was developed during the NATAC project was further systematised in the first version of the GLOBALCIT Database of Modes of Acquisition and Loss of Citizenship in 2013, covering 76 states. This database received a major update in 2016, which extended its scope to 173 states (Vink and Vonk 2021). These earlier iterations used an idiosyncratic approach that mainly used the phrasing and structure of the provisions in each country’s citizenship law as its starting point, albeit in as-standardised-as-possible qualitative descriptions of conditions for the acquisition and loss of citizenship. The GLOBALCIT Citizenship Law Dataset 2020 builds on these previous iterations and, while it does not abandon this idiosyncratic approach altogether, it aims to complement the qualitative descriptions of nationally-specific provisions with a standardised categorisation of these provisions in order to facilitate systematic comparison of functionally equivalent elements of citizenship law.

3. Data & coding

3.1 Modes of acquisition and loss of citizenship

3.1.1 Modes of acquisition of citizenship

In total, the 2020 dataset contains 32 modes and submodes of acquisition of citizenship. These can be divided into modes for birthright acquisition (A01-A05), residence-based acquisition (A06), and acquisition based on particular ties or characteristics (A07-A26). Three modes that were included in the NATAC project as well as the previous versions of the GLOBALCIT modes dataset are not included in the 2020 dataset, namely A15 (Coacquisition by other relatives), Restricted citizenship rights (A17), and Acquisition for other reasons (A27) (i.e. a residual category). Modes A15 and A17 are no longer included in this Dataset as the number of countries where these modes are applied is negligible. Mode A27 is no longer included as it lists only idiosyncratic country-specific provisions that cannot be compared across countries in a systematic manner. Mode A12 is now divided into two distinct modes, A12a and A12b, as the provisions that were captured by mode A12 greatly diverged.

As mode A06 is considered to be of major importance, the conditions for residence-based acquisition of citizenship are also captured separately by six submodes. This approach draws on the methodology of the Citizenship Law Indicators (CITLAW), which use similar subcategories (Jeffers et al 2017: p. 6).

Table 1. Comparative typology of modes of acquisition of citizenship

Mode ID	Short description	Target person	Focus
Acquisition			
A01a	Descent (born in country)	Person born to a citizen of a country (birth in that country)	Does the country permit a parent to confer his or her citizenship on a child born in the territory of the country of citizenship and, if so, under which conditions?

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A01b	Descent (born abroad)	Person born to a citizen of a country (birth abroad)	Does the country permit a parent to confer his or her citizenship on a child born abroad and, if so, under which conditions?
A02a	Birth in country	Person born in a country (irrespective of the citizenship and birthplace of his/her parents)	Does the country provide for a child to acquire citizenship based on birth in the territory irrespective of the citizenship and birthplace of his/her parents and, if so, under which conditions?
A02b	Birth in country (two generations)	Person born in a country to a parent who was also born in that country	Does the country provide for a child to acquire citizenship based on birth in the territory if one parent was also born there, irrespective of his/her citizenship, and, if so, under which conditions?
A03a	Foundlings	Child found in a country of unknown parentage	Does the country have a safeguard that provides for the grant of citizenship to a child of unknown parentage found in the territory and, if so, under which conditions?
A03b	Otherwise stateless (born in country)	Person born in a country who would otherwise be stateless	Does the country have a safeguard that provides for the grant of citizenship to an otherwise stateless child and, if so, under which conditions?
A04	Establishment of parentage	Person born to a citizen of a country whose descent is established by recognition or judicial establishment of parentage	Does the country provide for the acquisition of citizenship if parentage is established after birth and, if so, under which conditions?
A05	Birth in country (acquisition after birth)	Person born in a country (acquisition after birth and irrespective of the citizenship and birthplace of his/her parents)	Does the country have a safeguard that provides for the grant of citizenship to an otherwise stateless child born in the country, and if so, under which conditions?
A06	Residence-based acquisition	Person with a certain period of residence in a country	Does the country provide for residence-based acquisition?
A06a	Residence-based acquisition – residence conditions	Person with a certain period of residence in a country	Which residence conditions does the country provide for residence-based acquisition?
A06b	Residence-based acquisition – renunciation condition	Person with a certain period of residence in a country	Does the country require renunciation or loss of other citizenships for residence-based acquisition?
A06c	Residence-based acquisition – language condition	Person with a certain period of residence in a country	Does the country require knowledge of a national language, and at what level of competence, for residence-based acquisition?
A06d	Residence-based acquisition – civic knowledge or cultural assimilation condition	Person with a certain period of residence in a country	Does the country require the demonstration of civic knowledge or cultural integration for residence-based acquisition?

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A06e	Residence-based acquisition – criminal record condition	Person with a certain period of residence in a country	Does the country require the absence of certain crimes and/or offences or proof of moral character for residence-based acquisition?
A06f	Residence-based acquisition – economic resources condition	Person with a certain period of residence in a country	Does the country impose a requirement related to economic resources for residence-based acquisition, such as demonstrating income level, engagement in employment or the absence of welfare dependency?
A07	Residence during childhood	Person with a certain period of residence or schooling as a minor	Does the country provide for acquisition of citizenship by a person who as a minor has had a certain period of residence or schooling in the country and, if so, under which conditions?
A08	Marriage	Person who is the spouse or registered partner of a citizen	Does the country provide for acquisition of citizenship by the spouse or registered partner of a person who is already a citizen and, if so, under which conditions?
A09	Transfer to a child	Person whose parent is now a citizen of a country, but was not at the time of the person's birth	Does the country provide for acquisition of citizenship by the child of a person who has become a citizen (but the child did not do so at the same time) and, if so, under which conditions?
A10	Adoption or guardianship	Person who is adopted by a citizen	Does the country provide for acquisition of citizenship by a person who is adopted by a citizen, or cared for by a similar legal arrangement, and, if so, under which conditions?
A11	Transfer to other relatives	Person who is another relative of a citizen	Does the country provide for acquisition of citizenship by a relative other than the spouse or child of a person who is already a citizen and, if so, under which conditions?
A12a	Transfer from former citizen	Person who is the relative of a former citizen	Does the country provide for acquisition of citizenship by the spouse, child or grandchild of a former citizen and, if so, under which conditions?
A12b	Transfer from deceased citizen	Person who is the relative of a deceased citizen	Does the country provide for acquisition of citizenship by the spouse, child or grandchild of a deceased citizen and, if so, under which conditions?
A13	Spousal coacquisition	Person who is the spouse or registered partner of someone who acquires citizenship	Does the country provide for extending the acquisition of citizenship to the spouse or registered partner of a person who

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			is acquiring citizenship and, if so, under which conditions?
A14	Child coacquisition	Person who is the child of someone who acquires citizenship	Does the country provide for extending the acquisition of citizenship to the child of a person who is acquiring citizenship and, if so, under which conditions?
A16	Reacquisition	Person who at some point in the past was a citizen of a country and reacquires citizenship of that country	Does the country provide for reacquisition of citizenship by a former citizen, and, if so, under which conditions?
A18	Citizenship of a specific country	Person who possesses the citizenship of a specific country	Does the country provide for facilitated acquisition of citizenship (on easier terms than residence-based acquisition) by a person who is a citizen of a specific country and, if so, under which conditions?
A19	Cultural affinity	Person who has a cultural affinity	Does the country provide for facilitated acquisition of citizenship (on easier terms than residence-based acquisition) by a person who has an affinity to its culture, language, religion or ethnicity and, if so, under which conditions?
A20	Presumed citizens	Person who acted as a citizen of a country in good faith and/or was presumed to be a citizen for some time	Does the country provide for acquisition or recognition of citizenship in case of a person who has acted as a citizen in good faith or was treated by the authorities as a citizen for some time and, if so, under which conditions?
A21	Very long residence	Person who has resided in a country for a very long time	Does the country provide for facilitated acquisition of citizenship (on easier terms than residence-based acquisition) by a person who has resided in the country for a very long time and, if so, under which conditions?
A22	Refugees	Person who is a recognised refugee	Does the country provide specific conditions for the acquisition of citizenship by a refugee in its territory (different from those for residence-based acquisition) and, if so, under which conditions?
A23	Stateless persons	Person who is stateless or of undetermined citizenship	Does the country provide specific conditions for the acquisition of citizenship by a person in its territory who is stateless or of undetermined citizenship (different from those for residence-based acquisition) and, if so, under which conditions?

A24	Special achievements	Person who has special achievements	Does the country provide for acquisition of citizenship by a person who has special achievements and, if so, under which conditions?
A25	Public service	Person who is in the public service	Does the country provide for acquisition of citizenship by a person who is in the public service (including military service) and, if so, under which conditions?
A26	Investments	Person who has financial assets or invests money	Does the country provide for acquisition of citizenship by a person who makes a specific payment or invests a substantial sum of money in the country and, if so, under which conditions?

3.1.2 Modes of loss of citizenship

The 2020 dataset contains 15 modes of loss of citizenship (including a split mode, namely L13a and L13b). Mode L15 (Loss for other reasons) was included in the NATAC project as well as previous iterations of the GLOBALCIT modes dataset but is no longer included now as it lists only idiosyncratic country-specific provisions that cannot be readily compared across countries.

Table 2. Comparative typology of modes of loss of citizenship

Mode ID	Short description	Target person	Focus
L01	Voluntary renunciation	Person who voluntarily renounces the citizenship of his/her country	Does the country provide for a citizen to voluntarily renounce his/her citizenship and, if so, under which conditions?
L02	Residence abroad	Person who resides outside the country of which he/she is a citizen	Does the country provide for involuntary loss of citizenship because of residence abroad and, if so, under which conditions?
L03	Service in foreign army	Person who renders military service to a foreign country	Does the country provide for involuntary loss of citizenship by a person who renders military service to a foreign country and, if so, under which conditions?
L04	Other service to a foreign country	Person who renders other services to a foreign country	Does the country provide for involuntary loss of citizenship by a person who renders (non-military) services to a foreign country and, if so, under which conditions?
L05	Acquisition of foreign citizenship	Person who acquires a foreign citizenship	Does the country provide for involuntary loss of citizenship by a person who acquires a foreign citizenship and, if so, under which conditions?

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L06	Non-renunciation of foreign citizenship (acquisition by birth)	Person who acquired citizenship of his/her country by birth and retains a foreign citizenship	Does the country provide for involuntary loss of citizenship by a person who acquired citizenship at birth and does not renounce another citizenship also acquired at birth and, if so, under which conditions?
L07	Disloyalty or treason	Person who is disloyal to the country of which he/she is a citizen	Does the country provide for involuntary loss of citizenship by a person who is disloyal to the country, whose conduct is considered treasonous or whose loss of citizenship is otherwise considered to be in the interest of the country and, if so, under which conditions?
L08	Other offences	Person who commits other (criminal) offences	Does the country provide for involuntary loss of citizenship by a person who commits (criminal) offences (other than those covered in L07) and, if so, under which conditions?
L09	Fraudulent acquisition	Person who has acquired citizenship by fraud	Does the country provide for involuntary loss of citizenship by a person who has acquired citizenship or been recognised as a citizen as a result of fraud or misrepresentation and, if so, under which conditions?
L10	Non-renunciation foreign citizenship (acquisition otherwise than at birth)	Person who retains a foreign citizenship	Does the country provide for involuntary loss of citizenship by a person who acquired or retained citizenship on the condition that he or she renounced another citizenship and it is discovered that the person retains a foreign citizenship and, if so, under which conditions?
L11	Loss of citizenship by parent	Person whose parent loses citizenship of a country	Does the country provide for involuntary loss of citizenship by a person one or both of whose parents lose citizenship of the country and, if so, under which conditions?
L12	Loss of citizenship by extension to a spouse	Person whose spouse or registered partner loses citizenship of a country	Does the country provide for involuntary loss of citizenship by a person whose spouse or registered partner loses citizenship of the country and, if so, under which conditions?
L13a	Annulment of parentage	Person whose descent from a citizen is annulled	Does the country provide for involuntary loss of citizenship by a person whose descent from a citizen is annulled and, if so, under which conditions?

L13b	Adoption or guardianship	Person who is adopted by or in legal guardianship of a citizen of another country	Does the country provide for involuntary loss of citizenship by a person who is adopted by or in legal guardianship of a citizen of another country and, if so, under which conditions?
L14	Establishment of foreign citizenship	Person who acquired citizenship on the basis of a safeguard against statelessness and whose foreign citizenship is later established	Does the country provide for involuntary loss of citizenship by a person who acquired citizenship as a foundling, on the basis of apparent status as a citizen, or as a presumptively stateless person if possession of a foreign citizenship is established and, if so, under which conditions?

3.2 Conditions

The similarities and differences of these rules across all countries covered in the dataset are systematised by pre-defining, for each mode, a limited number of categories that indicate the main conditions according to which citizenship can be acquired or lost for each particular category. A complete list of the standardised categories for all modes can be found in Annex 1. In short, this approach entails that for each mode, all entries are assigned to a standardised category. In its most basic form, provisions are classified in two categories that indicate whether a relevant provision exists in a certain country or not. This binary coding scheme is only used if a more extensive categorisation is not feasible, either because the conditions are too diverse to be captured by standardised categories or because a mode is not prevalent and/or of minor importance. However, for the majority of the modes, a more extensive set of standardised categories is used. These standardised categories indicate the main condition(s) or restriction(s) for acquisition or loss citizenship on that particular ground. The standardised categories often distinguish provisions that are ‘generally applicable’ (which indicates that acquisition or loss of citizenship is in that case not subject to (substantial) conditions or restrictions) and provisions that impose substantial conditions or restrictions. For a large range of modes, it is also coded whether a group restriction applies, e.g. whether a condition/restriction on the basis of ethnicity, race or religion applies. If this is of relevance, conditions/restrictions on the basis of gender or the manner in which citizenship was acquired (e.g. if a mode of loss only applies to citizens other than by birth) were also coded separately. As the dataset is primarily descriptive rather than normative, it is not meant to assess whether provisions are in line with (international) legal standards. However, the practical significance of discriminatory citizenship law provisions has been strongly stressed on the international plane (e.g. UNHCR 2021; HRC 2009; CERD 2002; CERD 2006), which is why we considered it opportune to create separate standardised categories for these provisions. It is important to note that if a provision is only applicable to a certain group on the basis of ethnicity, race or religion, the provision is always categorised in the ‘group restriction’ category, even if other significant conditions or restrictions apply.

The standardised categorisations draw to a certain extent on the methodology of the Citizenship Law Indicators (CITLAW), as CITLAW makes use of a similar standardised approach (Jeffers et al 2017). The categorisations of the two datasets are nevertheless not identical as they differ in nature and scope.

3.3 Procedures

We pre-define ten standard procedures for the administrative processes by which citizenship is acquired or lost and also code each mode according to these standard procedures.

It is important to note that the terms used for our procedures can deviate from the terminology used in domestic legislation since the dataset aims to group together functionally equivalent modes of acquisition and respective acquisition and loss procedures. For example, a provision that grants an entitlement to citizenship would be recorded in the dataset under 'application (entitlement)' where there is no or limited discretion for the authorities to refuse the grant of citizenship, regardless of how the procedure is defined in national legislation.

The dataset is based on the substantive requirements as set out in law. In practice, the implementation of the law may vary significantly from these formal requirements (e.g. because of discriminatory practices). The dataset also does not record all procedural requirements such as the applicable fees, which can be hard to ascertain and frequently changed.

Procedural categories for acquisition of citizenship

Attribution (automatic)

Any ex lege acquisition of citizenship, i.e. acquisition of citizenship by operation of law that does not require some form of expression of intent (application, declaration, opting for citizenship or similar action) by the target person or his or her legal agent in order to result in the acquisition of citizenship.

Application (entitlement)

Acquisition of citizenship by a declaration of intent or another unilateral act by a person to become a citizen. This procedure is generally characterised by a facilitated procedure and conditions; voluntary (in contrast to automatic) acquisition, and the need for an oral or written declaration (by the person or by his/her legal representative) addressed to the relevant public authorities (often referred to as 'declaration') or another unilateral act by the person opting for citizenship. In these cases, there is generally no discretion to refuse the acquisition of citizenship. This means that this category also covers those procedures in which an individual or his or her legal representative initiates a procedure during which the public authorities have to assess criteria for granting citizenship, but have no or very limited discretion to refuse the grant of citizenship (eg in those cases where an act of registration suffices or there is an entitlement to naturalise once an individual fulfils the conditions). In some countries, acquisition of citizenship in this manner is regarded as a unilateral act ('option') by the person concerned with immediate effect when the declaration is lodged (unlike acquisition based on a decision by the authorities without immediate effect).

Application (discretionary)

Acquisition of citizenship that comes into effect through an act of registration with the public authorities by the person or his or her legal representative where there is limited, but some discretion to refuse the acquisition of citizenship (unlike acquisition that depends on a discretionary decision by the authorities). Registration procedures are generally characterised by a facilitated procedure and (substantially) facilitated conditions, voluntary (in contrast to automatic) acquisition, and a unilateral act by the person opting for citizenship. Those cases where the unilateral act of registration suffices and there is generally no discretion to refuse the acquisition of citizenship are categorised under 'application (entitlement)' procedures.

Grant (discretionary)

Any acquisition of citizenship that requires an application by a person or his or her legal representative as well as an act of granting citizenship by a public authority. This application procedure includes, but is not limited to, what is often referred to as 'naturalisation' in national legislation. In these cases, a person is not entitled to citizenship, and there is generally wider discretion to refuse the acquisition of citizenship.

Attribution (non-automatic)

Any acquisition of citizenship based on a decision by public authorities without involving the consent and/or an expression of will by the person concerned or his/her legal representative.

Procedural categories for loss of citizenship

Renunciation

Any loss of citizenship that becomes effective by a declaration or application by a person or his or her legal agent addressed to the relevant authorities concerning his or her intention or desire to give up the citizenship in question, without requiring the approval of a public authority.

Release

Loss of citizenship that requires an application from a person or his or her legal agent and becomes effective through the approval of a public authority.

Lapse

Any ex lege mode of loss of citizenship, i.e. automatic loss of citizenship by operation of law that requires neither explicit expression of intent (application, declaration, opting for another citizenship, or similar modalities) by the person or his or her legal agent to renounce citizenship, nor a decision or act by a public authority.

Withdrawal

Any mode of non-automatic loss of citizenship based on a decision by a public authority to deprive the person of his or her nationality. The simple issue of an official notice informing the person of the fact that he or she has lost citizenship ex lege does not count as a decision by the public authority and is thus categorised as lapse. Where possible, the specifications will include information on whether withdrawal is by decision of the executive branch or by court order.

Nullification

The act of a public authority pronouncing the acquisition of citizenship null and void because it is established at a later date (ex post facto) that conditions required for the acquisition were in fact not met at the time of application or declaration by the person in question or at the time of decision by the responsible authority (whichever is applicable). Nullification may become effective either ex tunc (retroactively since the time of acquisition) or ex nunc (only at the time of decision by the authority). This distinction is not indicated in the dataset.

3.4 Scope (geographical and temporal)

The Dataset covers 190 states and reflects each state's citizenship law as in force on 1 January 2020. The Dataset incorporates territories that are officially recognised by the United Nations as a (member) state. In addition, Taiwan is included in the Dataset even though it has not been officially by the United Nations as a (member) state. A small number of microstates recognised by the United Nations is currently not covered by the Dataset, namely Andorra, Liechtenstein, Maldives, Monaco, and San Marino.

3.5 Data sources

The input for the Dataset was principally provided by GLOBALCIT Country Experts who were selected on the basis of their specialist knowledge of citizenship policies in their country of expertise, as attested by (academic) research or policy engagement. The expert was asked to provide a concise representation of relevant legislative provisions for each mode of acquisition and loss and indicate whether changes took place within a particular timeframe. If a state's citizenship legislation was already covered by the GLOBALCIT Acquisition of Modes and Loss of Citizenship Dataset of 2016, the country expert verified and (if necessary) corrected and/or completed the existing datasheet. If the country was not covered by the 2016 version of the dataset, the country expert completed a blank version of the datasheet. For some countries, a preliminary version of the datasheet was prepared by a member of the GLOBALCIT team, which was subsequently verified and (if necessary) corrected and/or completed by the country expert.

For the Spanish-speaking South American states, Lusophone states, Middle Eastern and North African (MENA) states, African states (excluding Lusophone and MENA states) and Pacific states that were not covered by a Country Expert, the data was provided by a GLOBALCIT Regional Expert with extensive knowledge of citizenship policies in a particular region, as attested by (academic) research or policy engagement. The regional expert either filled in blank versions of the datasheets or received a preliminary version of the datasheets that was subsequently completed by a member of the GLOBALCIT team, which was subsequently verified and (if necessary) corrected and/or completed by the regional expert. If necessary, the data provided by country experts or regional experts was subsequently edited for clarity and correctness of spelling.

If a particular country was not covered by either a GLOBALCIT Country Expert or a Regional Expert, data were primarily retrieved from available GLOBALCIT sources, including country reports and (translations of) national legislation available in the GLOBALCIT repository. In addition, external sources were deployed if this was deemed necessary, e.g. national legislation or official translations thereof available from governmental or other reliable sources.

3.6 Data interpretation

If further interpretation of a particular entry was needed, this was generally done by analysing the relevant national legislation or official translations thereof, or alternatively by submitting a query to the relevant GLOBALCIT Country Expert or Regional Expert. If necessary, other GLOBALCIT resources or reliable external resources were also deployed.

If a provision is conflicting with another provision in a law with a superior status, then only the latter provision is coded (i.e. a provision enshrined in a country's citizenship law is conflicting with a constitutional provision, only the constitutional provision is coded). If this is the case, this is indicated in the 'conditions' column. If the exact meaning or scope of a provision remained unclear, either a GLOBALCIT Country Expert or Regional Expert was

consulted for guidance, or other GLOBALCIT sources and (if necessary) reliable external sources were deployed.

3.7 Validation

The data provided by country experts and regional experts was shared with members of the GLOBALCIT team, who subsequently validated the data. If any questions arose, these were submitted to the relevant country expert or regional expert, who subsequently provided a response, on the basis of which a finalised version of the data was prepared. The communication with the country experts and regional experts was subsequently kept on file by the researchers. If necessary, the data provided by country experts or regional experts was subsequently edited for clarity and correctness of spelling.

3.8 Limitations

The dataset is based on the substantive requirements as set out in law. In practice, the implementation of the law may deviate from these formal requirements (e.g. because of conflicting provisions or because of general policy practices that deviate from requirements of the citizenship law). If it is known for a particular entry that the practical implementation deviates from the substantive legal requirements, this is indicated in the 'conditions' column. It also does not record variations that the formal requirements allow for, e.g. in countries where regional or local authorities have a certain degree of discretionary competence regarding citizenship matters. For each entry, the dataset does record a standardised procedure under which the acquisition or loss of citizenship takes place, but it does not record all procedural requirements such as the applicable fees, which can be hard to ascertain and frequently changed.

4. Main patterns I: acquisition of citizenship

4.1 The Big Picture

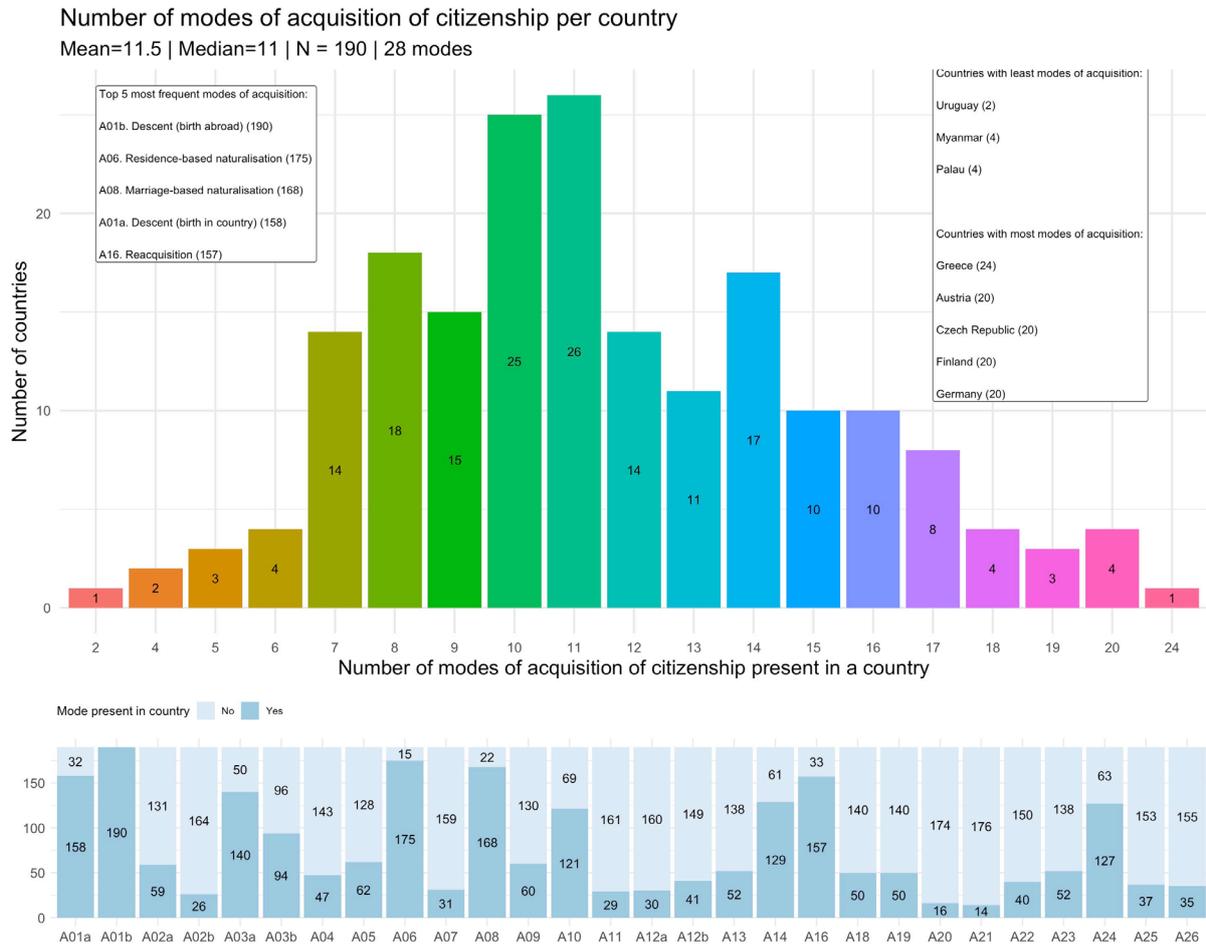
One possibility offered by the newly systematised data is to use the binary versions of the variables (A01a_bin, for mode A01a; A01b_bin, for mode A01b; etcetera) for a 'big picture' description of the frequency of the number of applicable modes of acquisition of citizenship across countries (see Annex II for the frequency of different types of provisions within each acquisition mode). This is visualised in Figure 1, which shows that the median number of modes of acquisition of citizenship applicable across the 190 countries included in the Dataset is eleven, out of a total of 28 acquisition modes. Note that this overview only focuses on the 'main' modes of acquisition, including A06 for residence-based acquisition, and leaves aside modes A06a-A06f which specify the conditions for naturalisation, where A06 is applicable. As is clear from the distribution visualised in Figure 1, there is considerable variation, with one country (Uruguay) having only two birthright-based acquisition modes in its citizenship law (A01b, A02a), whereas in Greece up to 24 out of a total possible 28 acquisition modes are applicable. The top five countries with the highest applicable number of acquisition modes are all European, reflecting a tradition of more densely regulated citizenship regimes in that regional context even if, as Waldrauch (2006b: 177-181) observed, there is also substantial variation in the density of citizenship regulation within Europe. Such variation may be related to the extent to which states through their citizenship regimes aim to facilitate the access to citizenship by immigrants and their descendants, as well as maintain legal links with the diaspora abroad (ibid.: 178).

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Remarkably, only one acquisition mode (A01b, citizenship acquisition by a person who is born abroad to a parent who is a citizen of that country) is applicable in all 190 countries. Other acquisition modes with a high frequency are those for residence-based acquisition (A06), marriage-based naturalisation (A08), citizenship acquisition by a person born in the country to a parent who is a citizen of that country (A01a) and reacquisition of citizenship (A16).

By contrast, some acquisition modes are much less common, such as provisions that make citizenship accessible to persons who acted as a citizen of a country in good faith and/or were presumed to be a citizen for some time (A20, 16 countries) or special naturalisation based on very long residence in a country (A21, 14 countries). All in all, the frequency distribution displayed in Figure 1 demonstrates that our comparative typology is sufficiently comprehensive to capture not just the most frequent modes of acquisition, but also less common modes; moreover, the typology is sufficiently limited in scope as there are no idiosyncratic modes that only occur in one or two countries, as this would inflate the number of modes in a way that is not be useful for global comparative analysis.

Figure 1. Modes of acquisition of citizenship around the world, 2020: overview



4.2 Birthright citizenship

4.2.1 Descent (A01, A04)

Birth in territory (A01a)

In 158 out of 190 states, citizenship can be acquired on the basis of a person’s descent from a citizen parent (*iure sanguinis*) if he/she is born in the country (mode A01a). This means that 32 states do not have such a provision, the great majority of which is located in the Americas, where citizenship can often be acquired on the basis of birth in the country alone (*iure soli*).

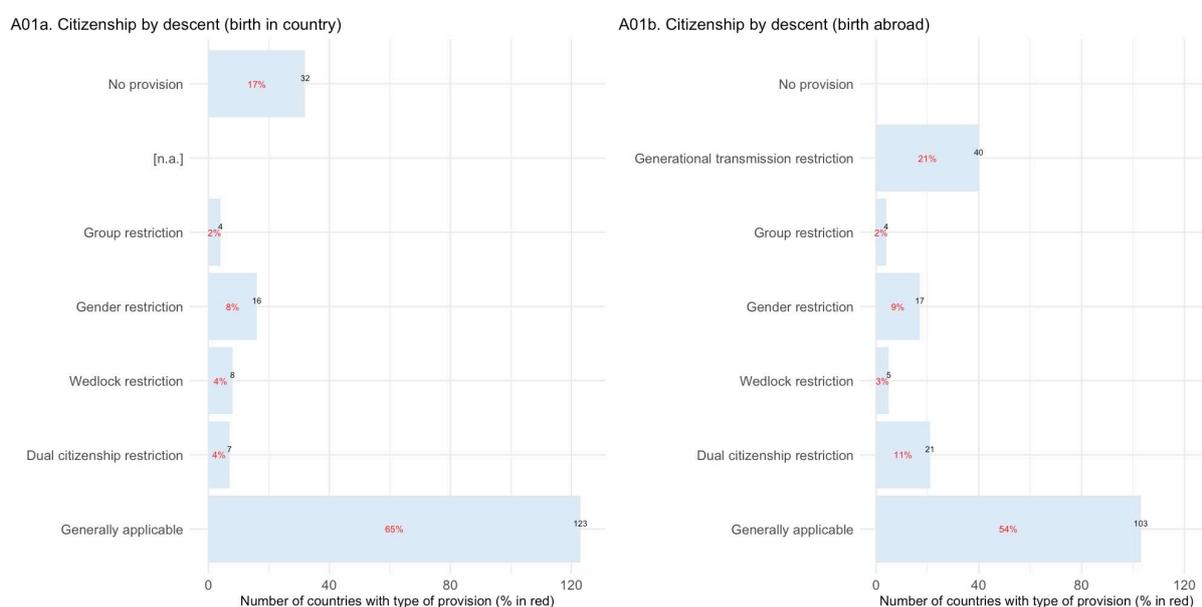
In 123 states, the provision is generally applicable, meaning that acquisition of citizenship is not restricted on the basis of gender, wedlock status, group origin, or the dual citizenship status of the parent(s). In these cases, citizenship is usually automatically acquired at birth.

As has been outlined in the literature, restrictions to the transfer of citizenship at birth on the basis of gender and wedlock status remain widespread in certain regions (Honohan and Rougier 2018; Erdilmen and Honohan 2020). In 16 states, predominantly located in Asia and Africa, attribution of citizenship on this ground is restricted on the basis of the gender of the citizen parent. These provisions are generally discriminatory in nature towards women, as they

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make the transmission of citizenship to descendants more challenging for female citizens than for male citizens. In most of these cases, male citizens can automatically transmit their citizenship to descendants, while additional requirements are in place for women to transmit their citizenship independently (e.g. citizenship attribution does not take place automatically because an application is required). In a small number of these states, female citizens cannot transmit citizenship altogether and this right is exclusively reserved to male citizens. While in these states children of female citizens who are born in the country may be able to acquire citizenship later in life, for example after a period of residence or upon application after reaching the age of majority, since there is no automatic acquisition these provisions are more restrictive. In our comparative typology such provisions are captured by modes A05 (Birth in country, acquisition after birth) and A07 (Residence during childhood).

Figure 2. Birthright citizenship by descent provisions around the world, 2020



In eight states, acquisition of citizenship is restricted on the basis of wedlock status of the parents. This usually means that male citizens can only transfer their citizenship to descendants that have been born in wedlock, while this is not required for citizenship transfer by female citizens. In one case (Cameroon), wedlock is required for citizenship by male citizens as well as female citizens. In four states, citizenship can only be transferred if the parent is a member of a certain group. In all of these cases (Brunei, Liberia, Sierra Leone, and Uganda), this means that the parent is required to originate from certain indigenous ethnic groups.

Birth abroad (A01b)

In all 190 states, citizenship can be acquired on the basis of a person's descent from a citizen parent (*iure sanguinis*) if he/she is born abroad (mode A01b). This mode unites countries where citizenship is traditionally exclusively transferred *iure sanguinis* with those countries where citizenship is generally transferred *iure soli* to those born on the territory of a country (see below, A02a/b), as in both types of countries the citizenship law needs to provide rules on the acquisition of citizenship by persons born abroad. Remarkably, all 190 countries around the world specify rules on the descent-based acquisition of citizenship at birth by children born abroad to citizen parents.

In 103 states, the provision is generally applicable, which means that there are no substantial restrictions in place for the attribution of citizenship in the case of birth abroad, irrespective of the gender or birthplace of the citizen parent. The number of generally applicable provisions under this mode is lower than the number of generally applicable provisions under mode A01a (Descent, born in country), which indicates that conditions for citizenship in the case of birth abroad are more frequently restricted than in the case of birth within the country.

In 40 states, a generational cap or restrictions with a similar effect are imposed in order to limit the transfer of citizenship by descent in the case of birth abroad. This can imply that acquisition of citizenship is dependent on the birthplace of the parent. For example, Mauritian citizenship is only transferred to a child born abroad if his/her parent was born in Mauritius. Conditions for the transfer of citizenship can also depend on the place of residence of the child or parent. A well-known example is the United States of America, as a child born abroad to an American citizen parent and an alien parent only can obtain citizenship under this mode if his/her citizen parent has been physically present in the United States or its outlying possessions for a period of at least five years, at least two of which after the parent reached the age of 14. Another relatively common restriction is that the parent must have acquired his/her citizenship in a certain manner in order to transfer it to a child born abroad. This often means that the parent must be a citizen otherwise than by descent (i.e. that the parent did not acquire citizenship by birth abroad). The effect of this restriction is that citizenship can only be transferred abroad by the first generation of emigrants.

In 21 states, a dual citizenship restriction applies. In the most restrictive cases, this means that citizenship can only be transferred in the case of birth abroad if both parents are citizens at the moment of birth (e.g. Bhutan). However, in the majority of cases, it means that citizenship is automatically acquired if a child is born abroad to two citizen parents, while the citizen parents are required to apply for the child's citizenship if only one of the parents is a citizen.

In 17 states, transfer of citizenship on this ground is restricted on the basis of gender. As for A01a, the majority of these states are located in Asia and Africa. In Jordan, Kiribati, Lybia, Qatar, Saudi Arabia, and Syria, citizenship can only be transferred in the case of birth abroad by a citizen father. In other cases, the provisions are discriminatory towards women, as transfer of citizenship is more difficult for female citizens than for male ones. It is important to note that the material scope of the provision for female citizens is very narrow (e.g. Saudi Arabia, where citizenship can only be transferred by a citizen mother if the father remains unknown).

In five states, a wedlock restriction applies. As for A01a, the wedlock restriction applies only in Cameroon to both citizen fathers and citizen mothers, while in the other states the wedlock restriction only applies to children who are born to a citizen father and a noncitizen mother. As for A01a, in four states (Brunei, Liberia, Siera Leone, and Uganda), citizenship can only be transferred in the case of birth abroad if the citizen parent belongs to a certain indigenous ethnic group or a particular race.

Establishment of parentage (A04)

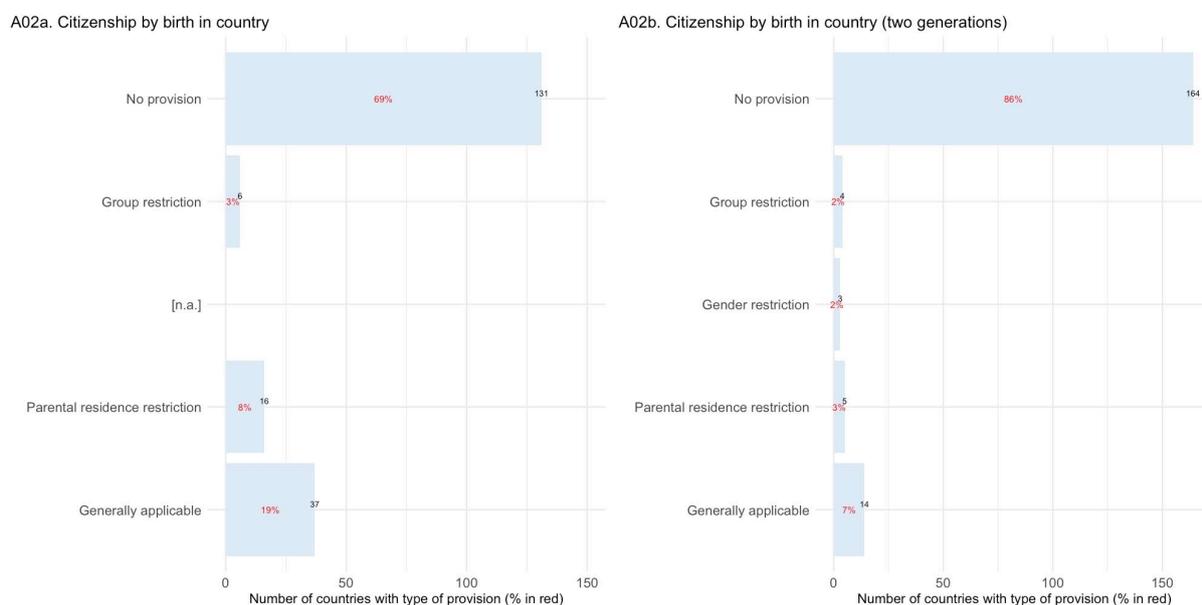
In 46 states, citizenship can be acquired through the establishment of parentage after birth (mode A04). This mode refers to the acquisition of citizenship by a person born to a citizen of a country whose descent is established by recognition or judicial establishment of maternity/paternity. It is important to note that if a child is born out of wedlock, procedures may exist to establish the paternity of a citizen father, for example inclusion of the father's name in the birth register entry of the country of birth and, if born outside the country, transcription into the records of the country of desired citizenship. These provisions fall outside the scope of this

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mode, and they are instead coded under modes A01a/A01b. However, if additional procedures exist to acquire citizenship that go beyond the establishment of paternity around the moment of birth, such provisions are coded under A04. Provisions for acquisition of citizenship through establishment of maternity are less frequent and typically relate to children born out of wedlock, children of a stateless mother, surrogacy arrangements and co-maternity.

In 25 states, recognition, legitimation, or another form of establishment of parentage is in itself sufficient for the acquisition of citizenship (leaving less substantial procedural requirements aside). In 21 states, substantial restrictions are in place for this mode of acquisition, which means that the child can only acquire citizenship if he/she is below a certain age at the moment parentage is established or that marriage is required for the establishment of parentage. In a small number of cases, other substantial restrictions apply (e.g. residence requirement for either the parent or the child, or restrictions regarding the citizenship status of the other parent).

Figure 3. Birthright citizenship by birth in country, provisions around the world, 2020



4.2.2 Birth in territory (A02, A03, A05)

Besides birthright citizenship by descent from a citizen, many countries around the world also have provisions in their citizenship law that attribute citizenship by birth in the territory of a state, irrespective of the citizenship and birthplace of the parent(s) of the child (*iure soli*) (mode A02a). In some context, particularly the Americas, this principle takes precedence for those born on the territory, whereas in other contexts, such rules exist by way of supplementary mechanism of inclusion to ensure access to citizenship at birth for descendants of immigrants. In such cases, citizenship attribution may be conditioned on the non-citizen parent(s)' length of residence in the country or, as in the case of mode A02b, their country of birth. Moreover, specific provisions exist in many countries aimed at preventing statelessness for children born on the territory who would otherwise be stateless (mode A03b) or for foundlings (A03a). Finally, some states maintain special rules on the basis of being born in the country, but with such facilitated access to citizenship occurring at a later moment in life (mode A05).

Citizenship at birth due to birth in country (A02a, A02b)

In 59 states, citizenship can be acquired by birth in the country, irrespective of the citizenship or birthplace of his/her parents (*iure soli*) (Figure 3, mode A02a). For 37 states, this mode is the main route to birthright citizenship, as in these states the provisions are generally applicable, meaning that there are no substantial restrictions in place. A large majority of these states are clustered in one geographic region, namely the Americas (cf. Acosta 2018).

For the other states, the provisions are supplementary to other birthright provisions. These provisions generally facilitate the acquisition of citizenship for the descendants of immigrant populations residing in the country. As a consequence, the scope of these provisions is generally narrower. For example, in 16 states, citizenship can only be acquired under this mode if the parent fulfils a residence requirement. This can imply that the parent must have a (permanent) residence status in the country. In some states, the parent must have resided in the country for a certain number of years, (generally between five to ten years), while other states have a combination of both requirements. In six states, namely Brunei, Guinea Bissau, Haiti, Israel, Liberia, and Uganda, the scope of the provision is restricted to children of parents who belong to certain (indigenous) ethnic groups or to a particular race.

In 26 states, citizenship can be acquired by a person who is born in a country to a parent who was also born in that country (Figure 3, mode A02b). These provisions aim to facilitate the acquisition of citizenship by persons who have a close link to the country due to their generational presence (Vink and De Groot 2010). In 14 states, the provision is generally applicable, meaning that the child acquires citizenship if either the mother or the father was also born in the country (even though further procedural requirements may be in place, e.g. birth registration or other evidence of the place of birth). In five states, a residence requirement applies to the parent, which usually means that the parent must regularly reside in the country. In three states (Togo, Tunisia, and Yemen), the provisions discriminate on the basis of gender, as citizenship can in these countries only be acquired on this ground if the father was born in the country. In four states (Brunei, Mali, Morocco, and Sierra Leone), the provision only applies to persons whose parent belongs to a certain race, ethnic group, or religion. Morocco combines both of these restrictions, as the provision is only applicable to persons whose father (required to be Arab or Muslim) was also born in the country.

Statelessness prevention at birth (A03a, A03b)

In addition to these general *iure soli* provisions, most states also apply a kind of 'repair mechanism' to avoid that children born on their territory who do not acquire any citizenship by descent or by being able to make use of a general territorial birthright rule become stateless. In 140 states, citizenship can be acquired by a person of unknown parentage who is born in the country (mode A03a). In 95 countries, this provision is generally applicable, which usually means that citizenship can be acquired automatically by a child of unknown parentage that is found in the country or (presumed to be) born in the country. In 44 states, an age restriction applies, which means that either an explicit age limit is mentioned in the provision or that it is stated that the foundling must be 'newborn' or 'infant'. In practice, the latter restriction is the most common. In one country (Madagascar), a group restriction applies, as the provision is only applicable to children whose parents were presumably Madagascan.

In 94 states, citizenship can be acquired by a stateless person who is born in the country (mode A03b). Even though a stateless person is defined in international law as a person who is not considered as a national by any state under the operation of its law, whether a person is recognised as stateless for the purposes of acquisition of citizenship under A03b depends

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on domestic legislation and policy practice in each particular state. The definition that is adhered to in practice by a particular state might therefore deviate from the international norm.

In 50 states, this provision is generally applicable (regardless of the citizenship status of the parents), and in virtually all of these cases the person is entitled to citizenship. In 44 states, a residence restriction and/or an age restriction applies. If residence is required, usually three to five years of residence before the age of majority is sufficient. If an age restriction applies, it is usually required that the person is below the age of majority at the moment of application. In 31 states, citizenship can only be acquired if the parents are also either without citizenship or of unknown citizenship. In those cases, a residence requirement may also apply, both for the parent as well as to the child.

Citizenship after birth due to birth in country (A05)

In addition to these provisions that attribute citizenship at the moment of birth on the territory a considerable number of countries grant facilitated access to citizenship at a later moment in life, as a result of the fact of birth in the country. These facilitated acquisition rules are coded in a separate mode (A05). In 62 states, a person born in a country can acquire citizenship at a later point in time. In 30 states, citizenship can be acquired on this ground before reaching the age of majority. In those cases residence requirements as well as age requirements often apply. The residence requirement usually ranges from three to ten years. In some cases citizenship can only be acquired if the application is made before a certain age (e.g. Belgium, where the application should be filed before the child reaches the age of twelve), while other countries impose a minimum age threshold (e.g. the United Kingdom, where the applicant must be ten years or older).

In 30 states, citizenship can only be acquired on this ground after reaching the age of majority. This commonly means that citizenship can either be acquired directly after reaching the age of majority or one year after reaching the age majority. However, in some cases more stringent requirements apply (e.g. Costa Rica, where the applicant must be 25 years or older). In two states (Haiti and Sierra Leone) citizenship can only be acquired if the applicant belongs to a certain race.

4.3 Residence-based acquisition (A06)

The term 'residence-based acquisition' refers to the acquisition of citizenship by a procedure in which the key requirement is a period of residence in the country and which is generally applicable to any non-citizen resident. This mode of acquisition of citizenship is commonly referred to as 'naturalisation' or 'ordinary naturalisation', but the usage of these terms is evaded here because of their ambiguity. If residence-based acquisition is restricted to a specific group of persons based on existing citizenship, race, religion, language or ethnic characteristics, this is coded under A18 (citizens of specific countries) or A19 (cultural affinity-based acquisition). Residence-based acquisition under mode A06 also excludes acquisition based on marriage (A08/A13), or specific provisions for acquisition by refugees (A22) or stateless persons (A23). In some states acquisition of citizenship is facilitated for persons who have resided in a country for a very long period of time. If this is the case, this provision is coded under mode A21 (very long residence). If there are provisions for residence-based acquisition based on special achievements or financial assets or investments or if residence-based acquisition is in general only possible under such exceptional circumstances this is coded under modes A24 or A26.

Due to the complex nature of conditions for residence-based acquisition, they are presented in six subcategories; residence conditions (A06a), renunciation conditions (A06b), language

conditions (A06c), civic knowledge and cultural integration conditions (A06d), criminal record conditions (A06e) and economic resources conditions (A06f).

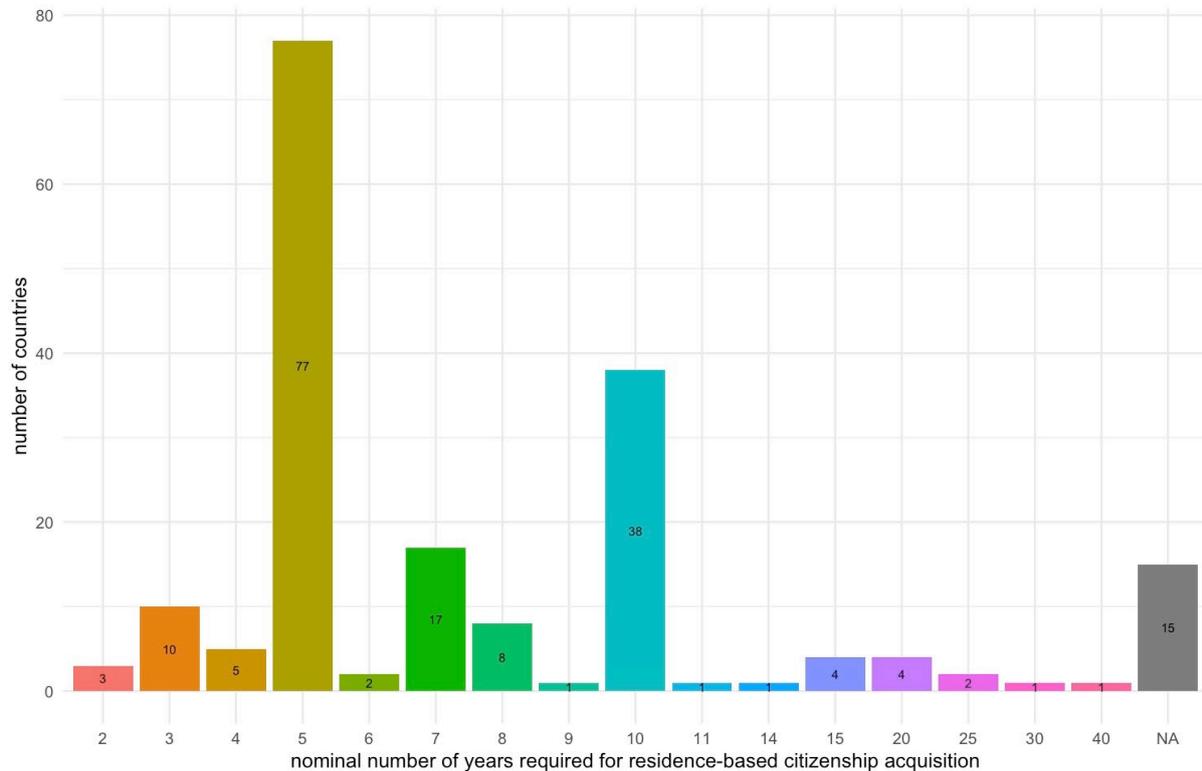
In total, 175 states have a provision for residence-based acquisition of citizenship. In the other 15 states there is no such generalised provision. In some of these states residence-based acquisition is restricted on the basis of their existing citizenship, race, religion, language or ethnic characteristics, and they are therefore excluded from this category. In other states there is no generally applicable provision for the acquisition of citizenship on the basis of residence. In these cases, acquisition of citizenship may be restricted to persons who have special achievements or financial assets. In a small number of cases there is no provision for any form of residence-based acquisition. Lastly, in exceptional cases (e.g. Uruguay), residence-based acquisition cannot result in the acquisition of 'full' nationality status, but instead results in the acquisition of an inferior legal status. Those provisions are not included in the GLOBALCIT dataset but a reference may be made to such restricted provisions under the 'conditions' column in the dataset.

Residence conditions (A06a)

The most typical condition for residence-based acquisition of citizenship focuses on length of residence required, defined as the nominal years of residence mentioned in the citizenship law. Under A06a, we include two types of variables: a) in a categorical version (represented in the online database, based on A06a_cat), countries are categorised on the basis of the length of the nominal period residence of required residence measured in years, i.e. less than five years, five years, six to ten years, and more than ten years; whereas b) in a count variable (A06a_yrs), included in the dataset, we count the precise nominal years of residence.

Figure 4. Residence-based acquisition of citizenship around the world: years of residence in country required* (A06a_yrs), 2020

* nominal number of years listed in citizenship legislation: effective residence requirement may vary in practice



The information based on coding only the nominal residence requirement from the citizenship legislation clearly must be interpreted with great care, as additional conditions related to residence may exist (i.e. the type of residence status requirement or limitations with regard to permissible interruptions in the residence period) can significantly impact the scope of the residence condition. Conditions related to residence status (e.g. the requirement to hold a permanent residence permit at the moment of residence-based acquisition or throughout the required residence period) or permissible interruptions (e.g. the duration of permitted absences or the requirement that residence must be ‘habitual’ or ‘continuous’) are indicated in the ‘specification’ section (as far as this information is available). Other conditions related to residence (e.g. whether the requirement that residence must be ‘legal’ or a period of irregular residence can also count towards residence-based acquisition) can also be listed in the ‘specification’ section. Since such further conditions are not in all cases codified in citizenship law or subsidiary regulations, in this version of the Dataset we were not able to include such information as we did not obtain systematically comparable information from all GLOBALCIT country experts. We hope to include more precise information on such residence requirements in future iterations of the Dataset.

In 18 states, most of which located in the Americas, less than five years of residence is required (Figure 4). In 77 states five years of residence is required. In 66 states six to ten years of residence is required. Hence, in the large majority (85%) of countries around the world residence-based acquisition of citizenship is available within a (nominal) period of ten years of residence in the country. In 14 states, virtually all located in Asia and Africa, more than ten years of residence are required.

Renunciation conditions (A06b)

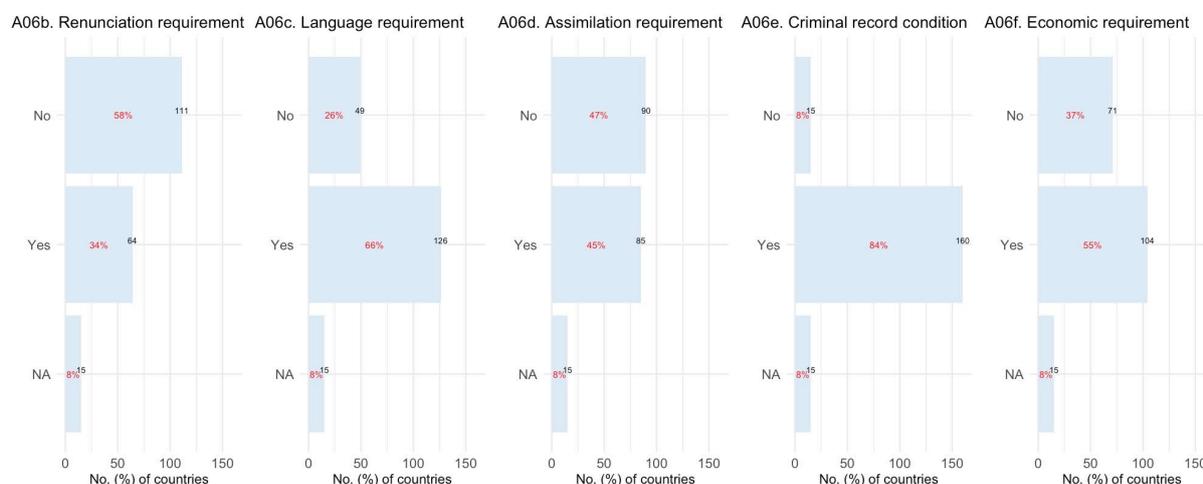
In most countries around the world, various additional requirements are in place for residence-based acquisition of citizenship. These are covered under mode A06 specifications A06b-A06f. We discuss these here and summarise the main findings from the new Dataset in Figure 5 (incl. 15 'NA' countries without residence-based acquisition provisions).

In addition to a residence requirement, at least traditionally many countries also require an applicant for residence-based acquisition of citizenship to renounce or lose his/her original citizenship or citizenships (A06b). In 2020, however, in a majority of 111 states (58%), renunciation of citizenship is not or no longer required for residence-based acquisition of citizenship. This group consist both of countries where renunciation has never been required during the postwar period, such as in Argentina or Canada, as well as those countries that have abolished this requirement in recent times, such as Italy (1992) or Norway (2020). In future updates of the Dataset we aim to include also information about the legal situation in previous years, in order to study this trend toward immigrant dual citizenship acceptance in greater detail (see eg Van der Baaren 2020 for a discussion of recent trends in the European Union).

In 46 states, such as in Austria, renunciation or loss of citizenship is generally required for residence-based acquisition of citizenship, meaning that there are no major exceptions to the main rule in place, other than those that are commonly required by international law – in particular for refugees or for citizens of countries that do not allow the renunciation of citizenship. Such major exceptions are in place, however, for residence-based acquisition of citizenship in 13 states. In this context 'major exceptions' includes those for citizens of certain states (such as in Germany for citizens of other EU member states), exceptions for spouses and registered partners of citizens (the Netherlands), and exceptions for persons of a certain ethnicity or origin. Due to a lack of sufficiently precise and comparable information, exceptions having to do with individual circumstances (e.g. excessive costs of renunciation) have not been coded as major exceptions.

In five countries, there is a nominal renunciation requirement, but this does not have any apparent consequences (i.e. no proof of renunciation is required and/or there is no corresponding provision for automatic loss of the acquired citizenship for those who have not renounced their original citizenship). This category only includes cases in which the text of the legislative provisions itself makes clear that the requirement does not have any consequences (e.g. Mexico, where a foreign citizenship only has to be renounced after acquiring Mexican citizenship).

Figure 5. Residence-based acquisition of citizenship around the world: additional conditions (A06b-A06f), 2020



Language conditions (A06c)

This submode looks at conditions that require an applicant for residence-based acquisition of citizenship to read, speak and/or understand a national language. If the citizenship legislation indicates that assimilation is required, we assume that this also requires a certain degree of knowledge of a national language and code this as a language condition. It is also coded whether a language condition requires a language certification or the passing of a language test. Information on the precise level of competence (where available) may be included in the conditions section. It should be noted that a provision is only included in this category if a country's citizenship legislation indicates that a test or certification is required. Information on fees for tests or preparatory courses is not included.

In total, 126 states have implemented a language condition for residence-based acquisition of citizenship. In a majority of cases, namely 91, the citizenship legislation does not indicate that a language test or language certification is required. In 27 – predominantly European – states, citizenship legislation does indicate that a language test or certification is required. In 8 states, there is no explicit language condition in place, but assimilation is required in general.

Civic knowledge and cultural integration conditions (A06d)

This submode covers provisions that make residence-based acquisition conditional upon the applicant's civic knowledge or civic assimilation. A distinction is made between conditions which require certification and/or a residence-based acquisition test and conditions without such requirements. The requirements for certification or a test can be further specified in the conditions column. As with language conditions (A06c), a provision is only included in the former category if a country's citizenship legislation indicates that a test or certification is required. Information on fees for tests or preparatory courses is not included. If only an oath of loyalty is required, this is not considered to be a civic knowledge or cultural assimilation condition.

In total, 85 states require civic knowledge or cultural integration for residence-based acquisition of citizenship. In 24 of these states, the citizenship legislation indicates that a language test or language certification is required, while in 61 states, this is not the case.

The onerousness of these requirements varies widely. On the one hand, a large number of states solely focus on civic knowledge, for example requiring a certain degree of knowledge about a country's constitution, its form of government, or a citizen's rights and duties. An example is South Africa, where an adequate knowledge of responsibilities and privileges of citizenship is required. On the other hand, some countries focus more strongly on cultural integration. In these cases, an applicant must, for example, prove that he/she has acquired a certain degree of knowledge about a country's culture, history and/or customs. An example is Bhutan, where residence-based acquisition of citizenship requires good knowledge of Bhutan's culture, customs, traditions and history. In other cases, proof of active participation in a country's society is required. While some countries only demand 'assimilation (e.g. Benin) or 'integration' (e.g. Algeria), other countries impose more far-reaching requirements. For example, residence-based acquisition of citizenship can be refused in the Philippines if an applicant does not prove he/she has mingled socially with Filipinos during his/her residence in the Philippines, or if he/she has not shown a desire to learn and embrace Filipino customs.

Criminal record conditions (A06e)

This submode focuses on conditions for residence-based acquisition relating to good character or one's criminal record. These conditions are part of the requirements in 160 out of the 175 countries where we can identify a provision for residence-based acquisition. The requirements are differentiated in the Dataset (A06e_cat) according to whether particular offences or conduct are specified or there is a more general requirement of good moral character.

In 68 states, a general requirement applies without any further specification; often this is referred to in a law as a requirement of 'good moral character'. In 48 states, there is both a general requirement as well as a specific requirement in place, which means that an application for residence-based acquisition of citizenship can be refused on generic (good character) grounds as well as specific grounds (i.e. convictions for certain specified crimes). These general requirements are relatively common in all continents, except in Europe, where they are relatively rare.

In 44 states, exclusions for certain specified crimes, offences or character queries apply. These commonly exclude applicants from residence-based citizenship acquisition on the basis of the duration of a prison sentence, which usually means that applicants may not have been convicted to imprisonment for a duration of one more than one or two years. However, it should be noted that in certain countries this exclusion is based on the potential duration of a prison sentence. For example, Vanuatu excludes applicants from residence-based acquisition of citizenship if they have been convicted of any offence carrying a maximum penalty of imprisonment for twelve months or more in Vanuatu or other jurisdictions. Such requirements are obviously much broader in scope. In some countries, a time limitation applies to exclusions on the basis of this ground. For example, residence-based acquisition of citizenship is not possible in Mongolia if the applicant has committed a criminal act during the preceding five-year residency period (in addition to that, permanent exclusions apply if certain severe crimes have been committed). If exclusions for certain specified crimes apply, these usually concern crimes against state security (e.g. Japan, where an applicant must not have advocated the overthrow of the Constitution or the Government of Japan) or particularly grave crimes (e.g. Lithuania, where persons who committed genocide, crimes against humanity, or war crimes are excluded). An exception is the Middle Eastern region, where such exclusions may also apply to persons who have committed crimes against honour or public morality.

Economic resources conditions (A06f)

Many countries also include requirements for residence-based acquisition of citizenship that relate to the applicant's level of income, engagement in employment, or the absence of (current, past or potential) welfare dependency (including requirements related to health). These do not include provisions for the residence-based acquisition through the payment or investment of an exceptional sum of money, as these are captured in mode A26.

In 104 states, an economic resources condition applies. This usually means that an applicant must prove that he/she has sufficient income in order to sustain him/herself. In some states, proof of payment of taxes is required. Importantly, a share of these states do not impose an explicit economic resources condition but nevertheless impose requirements related to a person's health. These requirements have also been coded as an economic resources condition, as these provisions usually aim to prevent the acquisition of citizenship by people who would not be able to earn an efficient income or might become a burden on a country's welfare state.

4.4 Acquisition based on particular ties or characteristics (A07-A26)

Modes A07 to A26 look at acquisition of citizenship after birth on the basis of a person's particular ties to a country or other characteristics. As not all of these modes are equally widespread or relevant in this regard, this section will highlight a selection of these modes, or clusters of related modes.

Marriage (A08)

This mode refers to the acquisition of citizenship by a person who is the spouse or registered partner of a citizen of that particular country. We categorise provisions on the basis of restrictions related to gender as well as residence requirements (A08_cat, see Annex II for the frequency of different types of provisions). Whether these provisions also cover same sex marriages or same sex partnerships depends in principle on a country's marriage law or civil partnership law. If a provision makes explicit reference to same sex marriage or same sex partnership, we specify this under 'conditions'.

In total, 168 states have a provision for the facilitated acquisition of citizenship on the basis of a marriage or partnership with a citizen. This makes it one of the most frequently present provisions in citizenship laws (see Figure 1). In 121 states these provisions are generally applicable (regardless of gender), of which 78 states impose a residence requirement. This residence requirement is generally shorter than the residence requirement for residence-based acquisition of citizenship (A06), and usually ranges between one and five years. In 43 states, there is no residence requirement for acquisition of citizenship on this ground. In a share of these 43 states, citizenship can be acquired directly after the conclusion of a marriage or a partnership. However, in other states a person must have been married to a citizen for a certain period of time before citizenship can be acquired. This cannot be equated to a residence requirement, as in these cases cohabitation abroad is not necessarily excluded.

In 32 states, citizenship can only be acquired on this ground by the female spouse of a male citizen. In nine states a certain period of residence is required, while in the other 23 states residence is not required. In one state, namely the Philippines, this restriction is reversed; there is a facilitated pathway for male spouses of a female citizen but not for female spouses of a male citizen. In ten states the marriage-based acquisition provision covers both female and male spouses of citizens but with requirements differentiated by gender. Finally, in four

countries facilitated provisions in this mode are restricted to members of a particular group (e.g. based on ethnicity, race or religion).

Acquisition of citizenship for vulnerable groups: refugees (A22) and stateless persons (A23)

A share of states has established special provisions for the acquisition of citizenship by members of certain vulnerable groups, namely refugees (A22) and stateless persons (A23). In total, 62 states have either created a special pathway for citizenship acquisition by refugees or stateless persons, or both.

In 40 states (21%), a special provision for the acquisition of citizenship by refugees is in place. In the majority of cases, this means that the conditions for regular residence-based acquisition of citizenship have been mitigated (e.g. a lowered residence requirement or an exception from the renunciation requirement). In 52 states (27%), a special provision for the acquisition of citizenship by stateless persons is in place (other than stateless persons who are born in the country, which are captured in mode A03a). In 42 states, these provisions are generally applicable to all stateless persons who are residing in the country. As for refugees, this implies in most cases that the conditions for regular residence-based acquisition of citizenship have been mitigated for this group, in particular the residence requirement. In 10 states, additional significant restrictions apply. This usually means that certain restrictions are imposed regarding the citizenship status of the parent (e.g. that a person's parent(s) must also be stateless) or that the provision is only applicable to minors.

Acquisition of citizenship on the basis of origin: citizens of certain states (A18) and cultural affinity (A19)

In total, 84 states allow certain persons to acquire citizenship (usually in a facilitated manner) on the basis of their origin. Mode A18 covers acquisition routes for citizens of certain states, while mode A19 covers acquisition routes for a person who has a cultural affinity to a country (broadly defined as a special tie based on a person's origin, belonging to an ethnic, cultural or language group, race or religion).

In 50 states a special citizenship acquisition for citizens of certain countries exists (mode A18). Acquisition is usually facilitated on the basis of regional or colonial ties. A number of states, mostly in the Caribbean region, facilitate the acquisition of citizenship by Commonwealth citizens. A number of European states facilitate acquisition for citizens of European countries, which is often restricted to citizens of Member States of the European Union or European Economic Area. Other relatively common clusters of facilitative regimes can be found among former USSR states or CIS states, Central- or South American and Iberian or Ibero-American states, Nordic states, and Arab states.

In 50 states, there is a special regime of citizenship acquisition on the basis of cultural affinity (mode A19), i.e. a special tie based on a person's origin, belonging to an ethnic, cultural or language group, race or religion, that does not depend on a person's country of citizenship. In the abundant majority of cases, these provisions allow persons to acquire citizenship on the basis of their national origin. For example, Croatia facilitates acquisition for persons residing who can prove that they are of Croatian ethnicity, while another provision facilitates acquisition for Croatian emigrants as well as their descendants (defined as (descendants of) persons who left Croatia before 8th October 1991 with the intention to reside abroad, or descendants of) members of the Croatian nation who originate from the territories of 'former states' that Croatia was part of). These provisions should be distinguished from reacquisition provisions covered by mode A16 that allow persons who can prove that they are former citizens to reacquire their citizenship status (usually in a facilitated manner).

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In a small number of – mostly African and Middle Eastern – countries, residence-based acquisition of citizenship is restricted to persons who belong to a certain group, race, or religion. These provisions are therefore also captured by this mode. An example is Liberia, where residence-based acquisition of citizenship is restricted to persons who are “[...] Negro or of Negro descent” and who have been lawfully resident in Liberia for at least two years. In a number of Middle Eastern countries, residence-based acquisition of citizenship is restricted to persons of Arab origin and/or persons who are Muslim.

In some South American countries (e.g. Colombia), acquisition of citizenship is facilitated for members of certain indigenous groups who have traditionally lived in the border regions of those countries (cf. Acosta 2018).

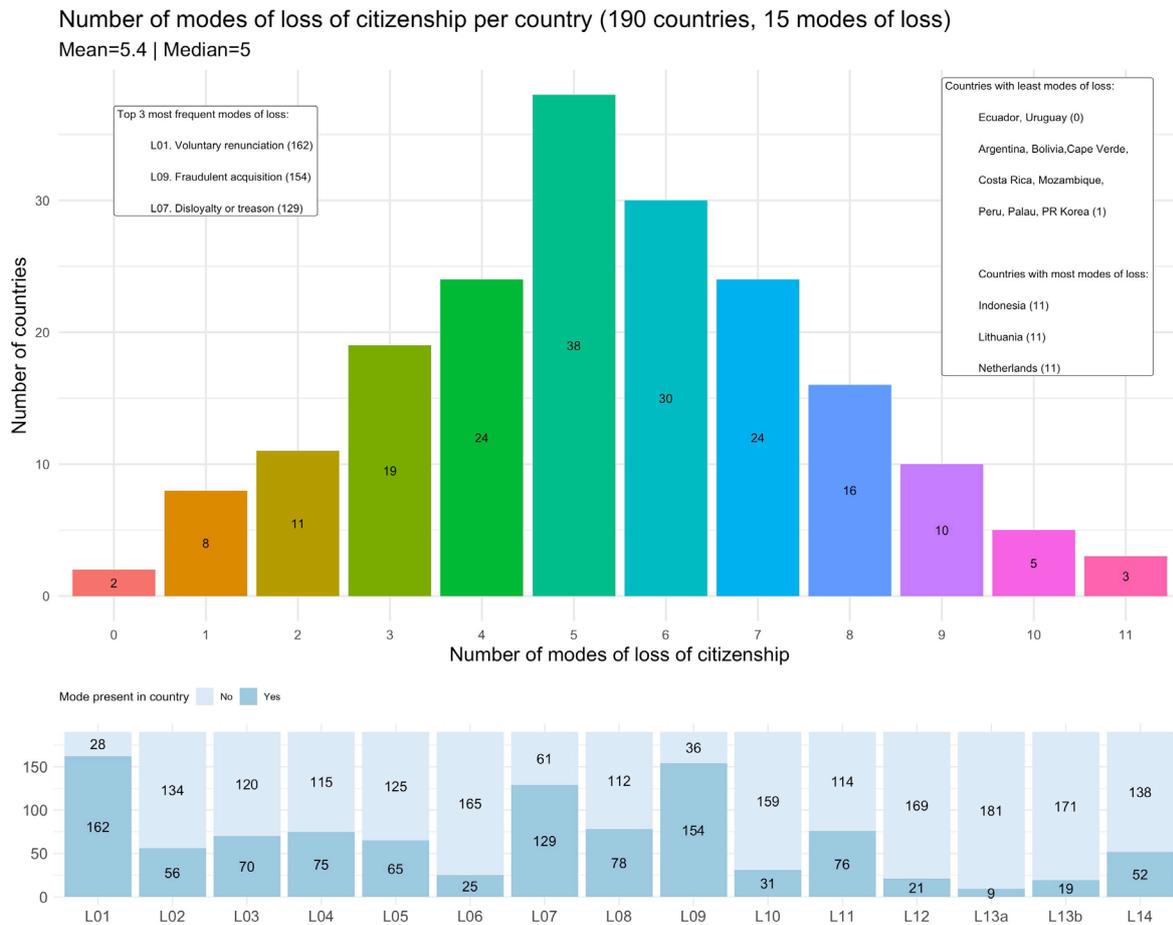
5. Main patterns II: loss of citizenship

5.1 The Big Picture

In section 4.1 above we observed that our comparative typology is both sufficiently comprehensive to capture all relevant modes of acquisition and limited enough to avoid idiosyncratic modes that only occur in one or two countries. When looking at the ‘big picture’ for the modes of loss of citizenship (Figure 6), based on 15 possible modes, we find that the median number of applicable modes of loss of citizenship is five. The most frequently applicable modes of loss of citizenship are voluntary renunciation of citizenship (L01, applicable in 162 out of 190 countries, see discussion below) and loss of citizenship after the discovery of fraud during the acquisition procedure (L09, in 154 countries). The least frequent mode is loss of citizenship by a person whose descent from a citizen has been annulled (L13a, only present in 9 countries).

As is clear from the distribution visualised in Figure 6, there is considerable variation, with two countries (Ecuador, Uruguay) having no possible manner in which citizenship can be renounced or lost. For Uruguay, which also was the country with the fewest modes of acquisition (two), it is clear that citizenship is regulated only to a very limited extent. By contrast, in three countries (Indonesia, Lithuania, the Netherlands), with eleven applicable loss modes, almost all applicable loss modes are covered in the respective citizenship laws.

Figure 6. Modes of loss of citizenship around the world, 2020: overview



5.2 Voluntary renunciation

Mode L01 refers to the loss of citizenship by a person who voluntarily renounces the citizenship of their country. First of all, it is important to note that in 23 states, there is no provision for voluntary renunciation of citizenship. These countries can predominantly be found in Asia, Africa, as well as the Americas and this practice is clearly in violation of Article 15 of the Universal Declaration of Human Rights stating that no one shall be denied the right to change his nationality. In some of these states, for example Bolivia, loss of citizenship is entirely impossible. In other states, citizenship can still be lost involuntarily on other grounds. In five states, four of which located in the Americas, only naturalised citizens can renounce citizenship.

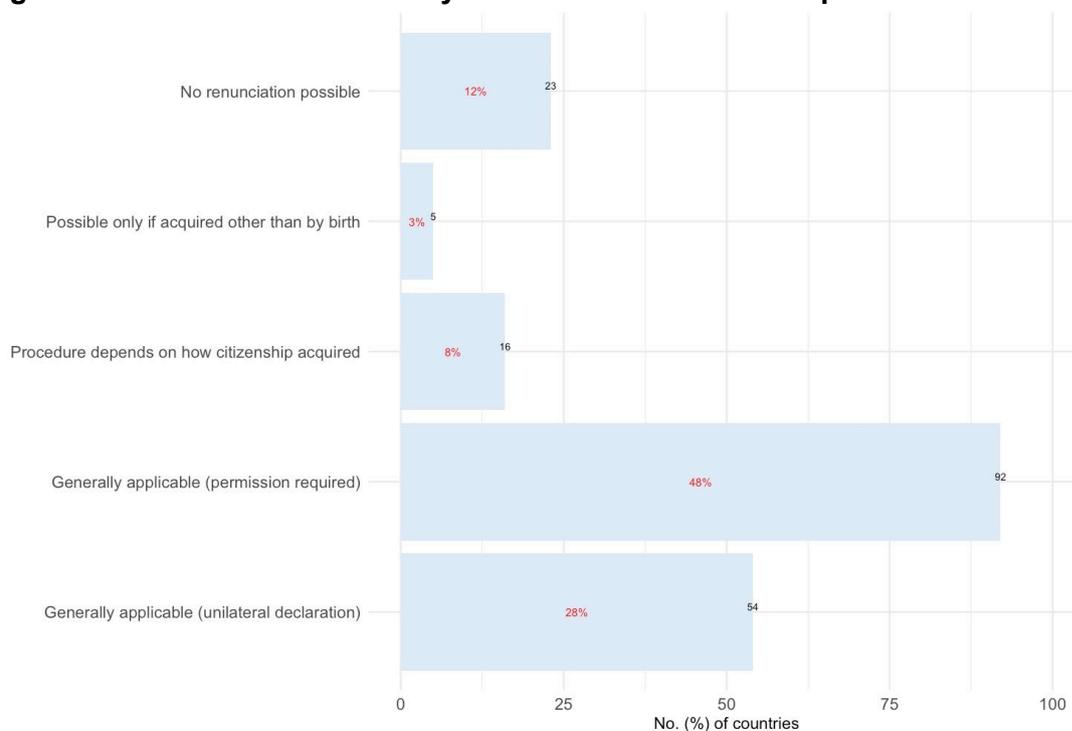
In 162 states voluntary renunciation of citizenship is possible, although the conditions vary widely. In 54 states, permission of the authorities is not required for the voluntary renunciation of citizenship, which usually means that the act of renunciation is sufficient for losing citizenship. In these cases, there may nevertheless be certain preconditions (i.e. that the person must have fulfilled his/her tax obligations), but if these preconditions are fulfilled citizenship is generally lost.

In 92 states, permission of the authorities is required for the voluntary renunciation of citizenship. This generally means that citizenship is only lost on this ground once a person has

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been officially released from their citizenship by the authorities. Common preconditions are that a person must have fulfilled duties towards the state, may not be a suspect in an ongoing criminal investigation and/or may not have been charged for any criminal act, must reside abroad, and proves to hold a foreign citizenship or is set to acquire a foreign citizenship.

Figure 7. Conditions for voluntary renunciation of citizenship around the world, 2020



In 16 states, the conditions for voluntary renunciation of citizenship depend on the manner in which citizenship was acquired. In most of these cases, this means that the threshold for voluntary renunciation of citizenship is higher for citizens by birth than for those who acquired citizenship later in life. In 5 countries, renunciation is possible only by those who did not acquire citizenship at birth.

In addition, when looking at relevant provisions in more detail (see e.g. entries in the online database on modes of loss of citizenship), in at least 24 states voluntary renunciation of citizenship may be permitted even if a person does not hold (or is set to acquire) a foreign citizenship. This means that voluntary renunciation of citizenship may result in statelessness.

5.3 Involuntary loss

Mode L02 to L14 cover involuntary loss of citizenship. As some of these modes do not frequently occur or are very limited in scope, this section will focus on one important cluster of modes, namely loss of citizenship for security-related reasons (mode L07 (disloyalty) and mode L08 (other offences)).

Involuntary loss of citizenship for emigrants: loss due to residence abroad (L02) and the acquisition of foreign citizenship (L05)

In a number of states, emigrants risk losing their original citizenship if they take up residence abroad or acquire the citizenship of the destination country. First of all, a caveat is in place here, as these modes are not exclusively applicable to emigrants. For example, if a person

would acquire a foreign citizenship without residing abroad (e.g. on the basis of ancestry or an investment), that person may still be at risk of losing their original citizenship too. Nonetheless, two modes of involuntary loss L02 (residence abroad) and L05 (acquisition of foreign citizenship) are deemed to be of particular relevance for emigrant populations, and these will hence be discussed in that context.

In 106 countries in total citizenship can be lost on the basis of residence abroad and/or acquisition of a foreign citizenship. In 56 of these countries citizenship can be lost on the basis of residence abroad (L02), while 76 countries have a loss provision for acquisition of a foreign citizenship (L05). In 27 states, citizenship can be lost on both of these grounds.

In a majority of 40 countries among those where citizenship can be lost due to residence abroad only certain categories or citizens (usually citizens by naturalisation) can lose citizenship on this ground. In these cases, citizenship can usually be lost if a person has resided abroad for a period between five to seven years, but in some cases (e.g. Argentina or the Dominican Republic), the minimum period of residence can be as low as two years. Loss of citizenship can commonly be prevented either before emigration by asking for permission to reside abroad or by filing a request for the retention of citizenship some time after taking up residence abroad. In 16 countries, the provision is generally applicable. The provisions in this category often entail that a person who was born abroad and who has not established certain ties with the country (e.g. by taking up residence in the country for a certain period of time or by applying for a travel document) can lose citizenship at the moment he or she reaches a certain age. Such provisions are predominantly found in the European region. In Brunei, Indonesia, Laos, Syria, and Uzbekistan, citizenship can under certain conditions be lost by any category of citizens who take up residence abroad for a substantial period of time. In Myanmar, the effect of the provision is even immediate, stating that citizenship can be lost if a person permanently leaves the country.

In 38 countries, citizenship can be lost upon the acquisition of a foreign citizenship by all categories of citizens without any major exceptions. In 22 of these countries, citizenship is lost automatically (lapse), while in 16 countries citizenship can be withdrawn in this case. In 27 states citizenship can be lost upon acquisition of a foreign citizenship, but major exceptions are made. For example, citizens who acquire the citizenship of certain countries may be exempted from the loss provisions. This can be a unilateral exception, as in Bahrain, where citizenship is not lost if the citizenship of a Member State of the Gulf Cooperation Council is acquired, or a bi- or multilateral exception, as in Tajikistan, which has concluded a treaty with Russia that reciprocally permits the retention of the original citizenship. In 16 of the countries loss is automatic (lapse), while in eleven states, withdrawal of citizenship is required. In eleven states, the loss provisions only applies to certain categories of citizens. This usually means that citizens who have acquired citizenship by naturalisation are set to lose their citizenship again if they acquire another citizenship. In only three of such cases loss occurs automatically (lapse), while in eight cases withdrawal of citizenship is required.

Combining modes: a comprehensive perspective on dual citizenship acceptance

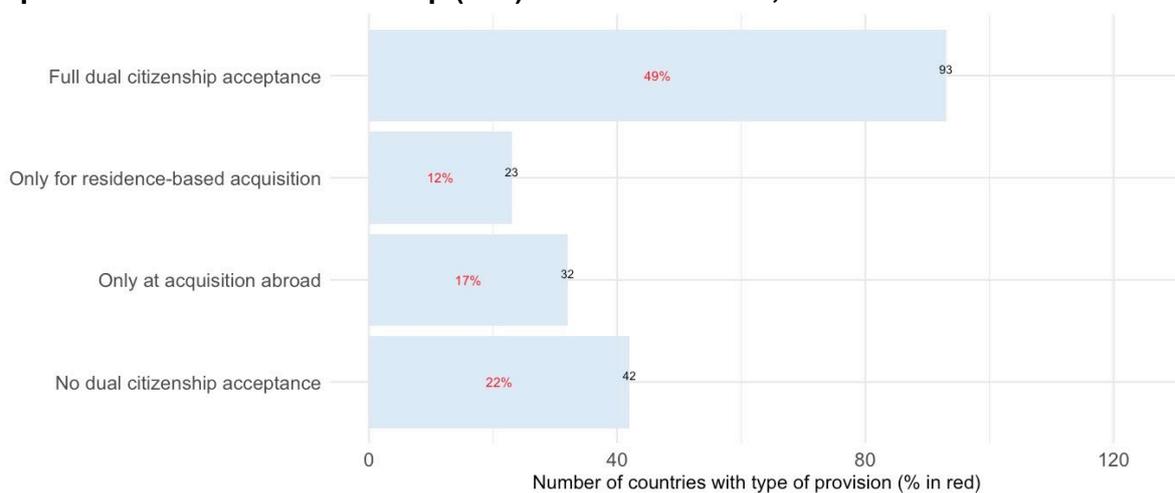
The new categorical coding scheme implemented in the Dataset facilitates also descriptive analysis beyond individual modes of acquisition and loss, by generating new categorical variables combining associated modes. The Dataset includes one variable ('dualcit_comb', included in a downloadable datafile but not in the online databases), which aims to capture a country's broad approach to dual citizenship acceptance. In particular, this variable combines information on whether a country requires applicants for naturalisation to renounce their previous citizenship (dual citizenship acceptance for 'incoming' naturalisations, based on A06b_cat), with information on whether citizens lose their citizenship upon voluntarily

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acquisition of another citizenship (dual citizenship acceptance for 'outgoing' naturalisations, based on L05_cat). It does not cover the acceptance of dual citizenship in acquisitions at birth (*iure sanguinis* or *iure soli*) or through special naturalisation procedures.

Note that with regard to dual citizenship acceptance for incoming acquisition, this variable is coded as 1 if there is a mode of residence-based citizenship acquisition ('ordinary naturalisation') and there is no effective renunciation requirement (i.e. no requirement, or a requirement without a corresponding loss of citizenship provision in case the renunciation requirement is not met). With regard to outgoing dual citizenship, only the rules for the majority population are coded; i.e. if loss of citizenship only applies to those citizens who have acquired citizenship other than by birth, this is coded as 1 (dual citizenship acceptance for the majority population). In our view this operationalisation provides the most intuitive 'overall' measurement of dual citizenship acceptance in ordinary naturalisation; however, users of the Dataset who prefer to apply a different operationalisation can do so on the basis of the underlying categorical variables (see Codebook, section 3.4).

Figure 8. Dual citizenship acceptance for residence-based acquisition (A06b) and acquisition of another citizenship (L05) around the world, 2020



As reflected in the frequency distribution visualised in Figure 8, in 2020 half of all countries around the world fully accept dual citizenship (49%), whereas only 22% of countries consistently restrict dual citizenship at incoming or outgoing naturalisations. Almost a third of countries only accept dual citizenship in residence-based acquisition, i.e. for immigrants (12%, incoming naturalisation) or for citizens who voluntarily acquire another citizenship abroad (17%, outgoing naturalisations).

In addition to this combined dual citizenship acceptance variable, users of the Dataset can generate their own combined variables based on combinations of modes or conditions for specific modes (see Vink 2022 for some more examples).

Involuntary loss of citizenship for security-related reasons: L07 (disloyalty) and L08 (other offences)

In many states certain acts that are considered as disloyal can lead to the involuntary loss of citizenship. Mode L07 (disloyalty) thus covers any behaviour or offence that is based on a concept of disloyalty or harm to the interests or security of the state, including offences such as treason. As the provisions covered by this mode are too diverse to be captured systematically the categories are generic and make limited distinctions. Provisions are

therefore categorised based on whether the loss provision applies to all categories of citizens or only to citizens who have acquired citizenship on a particular ground (e.g. whether at birth or through residence-based acquisition or another form of acquisition after birth).

In total, citizenship can be lost due to disloyalty (L07) in 129 countries. In 42 of these the loss provision is generally applicable, while in 87 countries it is restricted to certain groups of citizens (usually citizens by naturalisation). In general, provisions that are only applicable to a certain group of citizens are broader in scope than provisions that affect all citizens.

In a large share of countries, citizenship can only be lost on this ground if there is a prior conviction. The person must usually have been convicted for a crime against the security of the state or a crime against the interests of the state. Even though this mode of loss could be intuitively associated with acts of treason, provisions that explicitly permit the loss of citizenship if a person has been convicted for a treasonous act are very rare. In a small minority of countries any act of disloyalty or even disaffection (e.g. in writing or in speech) can lead to revocation of citizenship. These provisions are not necessarily security-related but are more likely to be rooted in a traditional 'thick' notion of citizenship.

In other states the relevant provisions do not have the abovementioned safeguard and are therefore broader in scope. In these cases harming state security or state interests can be sufficient reason for loss of citizenship without any prior conviction. These provisions tend to be particularly broad in scope if only naturalised citizens are affected.

Mode L08 refers to the involuntary loss of citizenship by a person who commits other criminal offences, different from those covered by L07 (i.e. crimes against the state, such as acts of disloyalty, treason, or terrorism). In total, in 78 countries citizenship can be lost due to criminal offences. In five countries the loss provision is generally applicable, while in 73 countries it is restricted to certain groups of citizens (usually citizens by naturalisation). In a majority of countries the provision is only applicable if a person has been sentenced to imprisonment for a minimal period of time – ranging from twelve months, to five, seven or ten years. Note that in some countries loss of citizenship can occur if a person has been convicted for an act that is punishable with imprisonment for a certain period of time, which sets the threshold much lower.

If the provision is only applicable to naturalised citizens time limits are relatively common. This means that loss can only occur if the act was committed within a certain period of time after citizenship was acquired – commonly five, ten or fifteen years. Not all of these provisions are security-related, as in some (mainly Middle Eastern) countries these provisions mostly refer to public morality. This means that loss of citizenship can occur if a person has committed an act of 'moral turpitude' or a 'crime against honour'.

6. Conclusion

6.1 Main contributions to a comparative research agenda

The GLOBALCIT Citizenship Law Dataset is the first dataset of its kind that is global in scope and covers a comprehensive range of citizenship law provisions. The global scope of the Dataset provides a broad and diverse perspective on citizenship law and therefore paints a comprehensive picture of patterns regarding acquisition and loss of citizenship around the world. A first contribution of the Dataset, we hope, is that it will contribute to overcoming what is still a Eurocentric or Western bias in the study of citizenship.

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Second, by including both qualitative summary descriptions of relevant provisions, references to articles in the law, and quantitative coding of categorical distinctions, we hope that the new Dataset will facilitate the comparative analysis of patterns, determinants and consequences of citizenship regime variation (see Vink 2017 for a discussion). Compared to previous iterations of the GLOBALCIT data on modes of acquisition and loss of citizenship, the new Dataset provides users with greater flexibility in selecting those modes they are interested in for descriptive or statistical analysis, and does so in a more transparent manner by providing a detailed codebook on how relevant provisions are coded in binary or categorical variables.

Third, while the dataset is descriptive rather than normative in nature, it may nevertheless help to put a spotlight on problematic aspects of current citizenship law, such as the discriminatory nature of certain citizenship law provisions that still abound, as highlighted by our discussion on provisions that restrict access to citizenship on the basis of gender and origin. For most modes of loss of citizenship we also find that in a large number of countries such rules only apply to persons who obtained citizenship in a certain manner (i.e. persons who did not acquire citizenship at birth). By applying deprivation rules differently on the basis of how citizenship has been acquired, countries make arbitrary distinctions between categories of citizens in their citizenship legislation. Moreover, we also observed that the right to change one's citizenship is violated in a considerable number of states where voluntary renunciation is not possible, or only under restricted conditions, or only for certain groups of citizens.

6.2 Main limitations

While the newly systematised approach of categorising comparable conditions for the acquisition or loss of citizenship has clear advantages, it also comes with certain limitations. First of all, the range of legal conditions that can be captured by standardised categories is limited, which means that the standardised categories are not in all cases equally fine-grained. This is partially compensated by the 'specification' information, which provides space for a more idiosyncratic description of the legal conditions for each entry. However, in short-hand entries it is impossible to provide an exhaustive description of all conditions. The dataset therefore does not aim to replace small-n comparative studies or in-depth country studies that can contextualise the interpretation and relevance of specific legal provisions.

Another obvious limitation is that the Dataset only captures legal conditions for the acquisition or loss of citizenship as enshrined in citizenship law. This means that deviant policy practices and conditions emerging from administrative implementation (i.e. additional conditions that are not enshrined in citizenship law, or legal provisions that are not complied with in practice) remain currently outside of the scope of the dataset.

6.3 Where to go from here

Having introduced the logic behind and possibilities of this newly systematised and updated GLOBALCIT Citizenship Law Dataset, we first of all emphasise that the current Dataset is explicitly seen as a version 1.00, i.e. a Dataset that we aim to continuously update in order to provide up-to-date information on citizenship laws. A next update is foreseen for 2022, to be worked out in collaboration with GLOBALCIT Country Experts and Regional Experts, where we update the data to the situation on 1 January 2022. Second, apart from updating, we also plan – and have already started – to back-code the data in order to provide longitudinal information on citizenship law development. We will initially do so for selected indicators, such as birthright or dual citizenship (expanding e.g. the data from Vink et al 2015 to cover not just automatic loss provisions, but also data on renunciation requirements for residence-based

naturalisation). From there, our ambition is to gradually expand the longitudinal coverage to all relevant modes of acquisition and loss of citizenship.

Third, and admittedly more tentatively, we aim to explore possibilities (e.g. building on Huddleston 2013) to cover not just legal provisions, but also policy practices that affect the acquisition or loss of citizenship. While such work can rely less directly on central coding and would require more extensive involvement of national and regional experts, we recognise that such information on citizenship law in practice is vital for a truly comprehensive and contextualised understanding of patterns, determinants and consequences of citizenship regimes.

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Annex I. Modes of acquisition of citizenship: standardised conditions

Mode	Title	Category	Condition
A01a	Descent (born in country)	1	Generally applicable provision
		2	Dual citizenship restriction
		3	Wedlock restriction
		4	Gender restriction: only if the father is a citizen (wedlock condition may apply/supplementary provision may apply)
		5	Group restriction: only if citizen parent is member of a particular group
		0	No provision
A01b	Person born to a citizen of a country (birth abroad)	1	Generally applicable provision
		2	Dual citizenship restriction
		3	Wedlock restriction
		4	Gender restriction: only if the father is a citizen (wedlock condition may apply/supplementary provision may apply)
		5	Group restriction: only if citizen parent is member of a particular group
		6	Intergenerational transmission restriction: conditional on birthplace/place of residence/mode under which parent acquired citizenship
A02a	Birth in country (second generation)	1	Generally applicable provision
		2	Parental residence restriction
		3	Group restriction: only if parent is member of a particular group
		0	No provision
A02b	Birth in country (third generation)	1	Generally applicable provision
		2	Gender restriction: only if the father is also born in country
		3	Parental residence restriction
		4	Group restriction: only if parent is member of a particular group
A03a	Foundlings	1	Generally applicable provision
		2	Age restriction
		3	Group restriction: only if person is (apparent) member of a particular group
		0	No provision
A03b	Born stateless	1	Generally applicable provision
		2	Age and/or residence restriction
		3	Parental status restriction: only if one or both parents are stateless (additional residence requirement may apply)

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		0	No provision
A04	Establishment of paternity/maternity	1	Generally applicable provision (no further conditions besides recognition/legitimation/establishment of parentage)
		2	Other restrictions (age, marriage or other conditions apply)
		0	No provision
A05	Birth in country (acquisition after birth)	1	Generally applicable provision (before age of majority)
		2	Age restriction: person can only acquire citizenship after reaching the age of majority
		3	Group restriction: only if person is member of a particular group
		0	No provision
A06	Ordinary Residence-based acquisition	1	Generally applicable provision
		0	No provision
A06a	Residence-based acquisition - residence conditions	1	Less than 5 years of residence required
		2	5 years of residence required
		3	6-10 years of residence required
		4	More than 10 years of residence required
		99	No provision for Residence-based acquisition
A06b	Residence-based acquisition - renunciation condition	0	No requirement
		1	Nominal requirement without apparent consequences
		2	Requirement with major exceptions
		3	Generally applicable requirement (no major exceptions)
		99	No provision for Residence-based acquisition
A06c	Residence-based acquisition - language condition	0	No requirement
		1	General assimilation requirement without specification
		2	Language requirement without certification or test
		3	Language requirement with certification or test
		99	No provision for Residence-based acquisition
A06d	Residence-based acquisition - civic knowledge and cultural assimilation conditions	0	No requirement
		1	Requirement without certification or test
		2	Requirement with certification or test
		99	No provision for Residence-based acquisition
A06e	Residence-based acquisition - criminal record	0	No requirement
		1	Exclusion for certain specified crimes, offences or character queries

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		2	Exclusion for certain specified crimes, offences or character queries and general moral character condition applies
		3	General requirement without specification (good moral character)
		99	No provision for Residence-based acquisition
A06f	Residence-based acquisition - economic resources	0	No requirement
		1	Requirement (conditions not further specified in dataset)
		99	No provision for Residence-based acquisition
A07	Residence during childhood	1	Generally applicable provision (based on period of residence or schooling in country)
		2	Restricted to period of residence in country
		3	Restricted to period of schooling in country
		0	No provision
A08	Marriage	1	Generally applicable provision (no residence requirement)
		2	Generally applicable provision (with residence requirement)
		3	Gender restriction: only for female spouse of male citizen (no residence requirement)
		4	Gender restriction: only for female spouse of male citizen (with residence requirement)
		5	Gender restriction: only for male spouse of female citizen
		6	Gender differentiation (residence requirement differs by gender)
		7	Group restriction: only if spouse of a citizen is member of a particular group
		0	No provision
A09	Transfer to a child	1	Generally applicable provision (child can be minor or adult)
		2	Age restriction: only if child is a minor
		0	No provision
A10	Adoption or guardianship	1	Age restriction: only if adopted child is a minor
		2	Generally applicable provision (adopted child can be minor or adult)
		0	No provision
A11	Transfer to other relatives	1	Generally applicable provision (applies to relatives in ascending and descending line)
		2	Generational restriction: only if person is a parent of a citizen
		3	Generational restriction: only if person is a grandchild of a citizen
		0	No provision
A12a	Transfer from a former citizen	1	Provision exists (conditions not further specified in dataset)
		0	No provision
A12b	Transfer from a deceased citizen	1	Generally applicable provision (applies to descendant or spouse)

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		2	Generational restriction: only applies to child or grandchild
		3	Spousal restriction: only applies to spouse
		0	No provision
A13	Spousal coacquisition	1	Generally applicable provision (without residence requirement)
		2	Generally applicable provision (with residence requirement)
		3	Gender restriction: only applies to female spouses (without residence requirement)
		4	Gender restriction: only applies to female spouses (with residence requirement)
		0	No provision
A14	Child extension	1	Generally applicable provision (child can be minor or adult)
		2	Age restriction: only if child is minor
		0	No provision
A16	Reacquisition	1	Generally applicable provision
		2	Mode restriction: only if citizenship was lost on particular grounds
		0	No provision
A18	Citizens of specific countries	1	Provision exists (without residence requirement)
		2	Provision exists (with residence requirement)
		0	No provision
A19	Cultural affinity	1	Provision exists (conditions not further specified in dataset)
		0	No provision
A20	Presumed citizen	1	Provision exists (conditions not further specified in dataset)
		0	No provision
A21	Very long residence	1	Provision exists (conditions not further specified in dataset)
		0	No provision
A22	Refugees	1	Provision exists (conditions not further specified in dataset)
		0	No provision
A23	Stateless persons	1	Generally applicable provision
		2	Additional conditions apply (e.g. citizenship status parent)
		0	No provision
A24	Special achievements	1	Provision exists (conditions not further specified in dataset)
		0	No provision
A25	Public service	1	Generally applicable provision (applicable to military and public service)
		2	Restriction: only for military service
		3	Other restriction: only for public service
		0	No provision

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A26	Special achievements – financial assets or investments	1	Provision exists (conditions not further specified in dataset)
		0	No provision

Annex II

Frequency of type of provision (category) by mode of acquisition of citizenship across 190 countries in 2020

<i>mode</i>	category								total
	0	1	2	3	4	5	6	7	
<i>A01a</i>	32	123	7	8	16	4			190
<i>A01b</i>		103	21	5	17	4	40		190
<i>A02a</i>	131	37	16	6					190
<i>A02b</i>	164	14	3	5	4				190
<i>A03a</i>	50	95	44	1					190
<i>A03b</i>	96	50	13	31					190
<i>A04</i>	143	25	21	1					190
<i>A05</i>	128	30	30	2					190
<i>A06</i>	15	175							190
<i>A06a</i>		18	69	76	12				175
<i>A06b</i>	111	5	13	46					175
<i>A06c</i>	49	8	91	27					175
<i>A06d</i>	90	61	24						175
<i>A06e</i>	15	44	48	68					175
<i>A06f</i>	71	104							175
<i>A07</i>	159	2	24	5					190
<i>A08</i>	22	43	78	23	9	1	10	4	190
<i>A09</i>	130	26	34						190
<i>A10</i>	69	35	86						190
<i>A11</i>	161	7	15	7					190
<i>A12a</i>	160	30							190
<i>A12b</i>	149	15	16	10					190
<i>A13</i>	138	12	11	23	6				190
<i>A14</i>	61	15	114						190
<i>A16</i>	33	54	103						190
<i>A18</i>	140	9	41						190
<i>A19</i>	140	50							190
<i>A20</i>	174	16							190
<i>A21</i>	176	14							190
<i>A22</i>	150	40							190
<i>A23</i>	138	42	10						190
<i>A24</i>	63	127							190
<i>A25</i>	153	12	11	14					190
<i>A26</i>	155	35							190

Annex III. Modes of loss of citizenship: standardised conditions

Mode	Title	Category	Condition
L01	Renunciation	1	Generally applicable provision (citizenship can be renounced)
		2	Generally applicable provision (permission required)
		3	Renunciation procedure depends on how citizenship was acquired
		4	Renunciation only possible if citizenship acquired other than by birth
		0	No provision
L02	Residence abroad	1	Generally applicable provision
		2	Loss only applies to certain categories of citizens
		0	No provision
L03	Service in foreign army	1	Generally applicable provision
		2	Loss only applies to certain categories of citizens
		0	No provision
L04	Other service to a foreign country	1	Generally applicable provision
		2	Loss only applies to certain categories of citizens
		0	No provision
L05	Acquisition of foreign citizenship	1	Generally applicable provision (lapse)
		2	Generally applicable provision but with exceptions (lapse)
		3	Loss only applies to naturalised citizens/citizens otherwise than by birth (lapse)
		4	Generally applicable provision (withdrawal)
		5	Generally applicable provision but with exceptions (withdrawal)
		6	Loss only applies to naturalised citizens/citizens other than by birth (withdrawal)
		0	No provision
L06	Non-renunciation of foreign citizenship (acquisition based on birth)	1	Generally applicable provision
		0	No provision
L07	Disloyalty	1	Generally applicable provision
		2	Loss only applies to certain categories of citizens
		0	No provision
L08	Other offences	1	Generally applicable provision
		2	Loss only applies to certain categories of citizens
		0	No provision
L09	Fraudulent acquisition	1	Generally applicable provision
		2	Loss only applies to certain categories of citizens
		0	No provision
L10	Non-renunciation of foreign citizenship (acquisition not based on birth)	1	Generally applicable provision
		2	Loss only applies to certain categories of citizens

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		0	No provision
L11	Loss of citizenship by extension to a child	1	Generally applicable provision
		2	Generally applicable provision but exceptions apply
		3	Only applies if citizenship of parent is lost on particular grounds
		4	Only applies if citizenship of parent is lost on particular grounds and exceptions apply
		0	No provision
L12	Loss of citizenship by extension to a spouse	1	Generally applicable provision
		2	Only applies to female spouse if citizenship lost by male citizen
		0	No provision
L13a	Annulment of parentage	1	Generally applicable provision
		2	Provision includes age condition/time restriction
		0	No provision
L13b	Adoption or guardianship	1	Generally applicable provision
		2	Loss applies only to person adopted by two foreign citizens
		0	No provision
L14	Establishment of foreign citizenship	1	Loss applies to person who has acquired citizenship as foundling
		2	Loss applies to person who has acquired citizenship as stateless person
		3	Loss applies to person who has acquired citizenship as foundling or stateless person
		0	No provision

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Annex IV

Frequency of type of provision (category) by mode of loss of citizenship across 190 countries in 2020

	category							
<i>mode</i>	0	1	2	3	4	5	6	total
<i>L01</i>	23	54	92	16	5			190
<i>L02</i>	134	16	40					190
<i>L03</i>	120	53	17					190
<i>L04</i>	115	45	30					190
<i>L05</i>	114	22	16	3	16	11	8	190
<i>L06</i>	165	25						190
<i>L07</i>	61	42	87					190
<i>L08</i>	112	5	73					190
<i>L09</i>	36	61	93					190
<i>L10</i>	159	12	19					190
<i>L11</i>	114	11	11	24	30			190
<i>L12</i>	169	12	9					190
<i>L13a</i>	181	6	3					190
<i>L13b</i>	171	12	7					190
<i>L14</i>	138	35	6	11				190

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