Chapter 3

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Abstract
Beginning on 1st January 1992 immigrants who wanted to naturalize in the Netherlands were no longer required to renounce their original citizenship. In 1997 the renunciation demand was reinstated. The Dutch citizenship Law of 2000 made the acquisition of Dutch citizenship more difficult, while at the same time it has become easier for Dutch emigrants to retain dual citizenship. This article explains these contradictory consequences, on the one hand for immigrants and on the other hand for Dutch emigrants, by focusing on the development of Dutch integration policies. Integration policies have changed in recent years from a pragmatic pluralist approach to a more principled assimilationist approach. This shift in integration policies is explained by the changing concept of nationhood in the Netherlands, which became more expressive, or what might be seen as republican with increasingly strong ethno-cultural voices.

Introduction
In 1991 the Dutch government coalition of Christian Democrats (CDA) and Social Democrats (PvdA) abolished the renunciation requirement for naturalization. Starting on 1st January 1992, immigrants who wanted to naturalize were no longer required to renounce their original citizenship. In 1997, after years of debate in parliament, the

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The End of Multiculturalism: The End of Dual Citizenship? The Netherlands

renunciation requirement was reinstated. The Dutch Citizenship Law of 2000, which came into force on 1st April 2003, has made the acquisition of Dutch citizenship more difficult. At the same time it has become easier for Dutch emigrants to retain Dutch citizenship and hold dual citizenship.

This chapter discusses and attempts to provide explanations for the development of Dutch legislation and policy concerning dual citizenship. On what ground was the renunciation requirement abolished and how was its subsequent reinstatement defended? How can a policy concerning dual citizenship which has different and contradictory consequences for immigrants and Dutch emigrants be explained?

To answer these questions, this chapter provides an analysis of political debates since 1985, the point at which the renunciation requirement first came under discussion. In explaining the development of policy regarding dual citizenship, a central issue is whether it was the Dutch concept of 'nation' that was determining the outcome, or whether there were other factors at play. This chapter demonstrates that from the 1980s access to naturalization and dual citizenship was initially dealt with in a pragmatic manner, with the objective being the effective integration of immigrants. The prevailing notion at the time, in a shared understanding between the political left and right, was that the integration of immigrants had to be fostered by granting immigrants a strong legal position. Naturalization was perceived as a means to further such integration. Efforts were taken to make access to Dutch citizenship easier. During this period, naturalization became a right instead of a favour. The duration of procedures was shortened considerably and the decision-making process was transferred from police and judicial authorities to municipal authorities, who from that point onwards would provide advice to the Immigration and Naturalization Service (IND). The abolition of the renunciation requirement in 1992 can be seen as a next step in the effort to make naturalization for immigrants easier. In the period between 1992 and 1997, naturalization rates rose considerably while 80 per cent of the naturalized immigrants retained their first citizenship.

During the 1990s, however, this pragmatism made way for a more formalistic approach. The Dutch government's and political parties' approach towards integration of immigrants changed. Gradually, in a newly built consensus between left and right, naturalization was no longer seen as a means to further integration, but as the 'crowning' of a completed integration process. This can be explained in the context of a shift away from multicultural policies to more assimilationist policies. In contrast to the 1980s, a higher degree of cultural adaptation was expected, and dual citizenship came to be seen as a cultural issue. The result was that the renunciation requirement was reinstated in 1997 and access to naturalization was made more difficult by means of the new Citizenship Law 2000.

Thus, arguments within the ideological system of 'integration' are important if one is to explain the development of renunciation policy. However, as this chapter attempts to demonstrate, arguments on the issue of dual citizenship should also be placed within the ideological system of 'nation'. During the period under consideration, the Netherlands shifted from a vague and implicit, so to speak 'empty', concept of nationhood at the beginning of the 1980s to a more explicit concept of nationhood. This development first became clear in 2001, under the reign of the Purple government of the Social Democrat (PvdA), the conservative-liberal VVD, and the progressive-liberal D66. In this period, the Dutch republican model of nationhood not only became more explicitly republican, it also came under pressure by ethno-cultural voices in political and public debates on citizenship. This development became increasingly important after the remarkable changes in Dutch politics following 9/11 and the killing of the populist politician Pim Fortuyn in May 2002. The provisional result of these changes is that the current Balkenende II government (CDA, VVD, D66) considers dual citizenship as undesirable and intolerable. Plans to ban dual citizenship are underway.

The above developments and the present intention to ban dual citizenship could be explained as a clean break in the Dutch thinking about integration and dual citizenship. After all, the Netherlands were perceived as a pacesetter for multicultural policies. In this chapter I argue that it would be more accurate to interpret the current state of play as the result of a path-dependant process (Gerdes, Rieple and Faist, this volume, chapter 2), and a continuation of Dutch integration policies, which have defined immigrants as ethnic and cultural 'others', in new terms.

In order to explain the final outcomes of the political debates on dual citizenship, it is necessary first to describe the development of the Dutch version of multiculturalism and its relationship to both integration policies and the Dutch concept of nationhood. I will then outline the political opportunity structure, including a description of Dutch consensus policy. The discussions of integration policies, nationhood, and the political opportunity structure will help us understand the arguments used within political debate on dual citizenship. After reviewing the political debates, the media debate will be analyzed. In concluding, I will offer possible explanations for the current outcomes of the political process.

**Multiculturalism and Integration**

As mentioned above, the Netherlands are often viewed as a pacesetter of multicultural policies (e.g. Vermeulen and Penninx 2000, 3). More recently, the shift from multiculturalism towards a more assimilationist approach has also been noted (Joppke and Moraw ska 2003, 2).

In the aftermath of World War Two, the Netherlands had to respond to the immigration from the former Dutch colony of Indonesia, followed by the immigration of Mediterranean guest-workers in the 1950s and 1960s, and immigration from Surinam, the Dutch colony that became independent in 1975. During the 1970s, the Dutch government developed a two-track policy aimed at both integration and the return of immigrant guest-workers to their home country. Dutch society in general and the government in particular became more aware of the ambiguous attitudes among Dutch citizens towards immigrants after the terrorist actions carried out by Moluccans during the 1970s. In 1978, during a debate on the Moluccan minority group, the PvdA asked for a coordinated policy which would concern all minority groups (Fermin
1997, 79). At the request of the Dutch government in 1979, the Scientific Council for Government Policy (Wetenschappelijke Raad voor het Regeringsbeleid, 1979) presented its influential report, *Ethnic Minorities*, in which it advised the government to accept the fact that immigrants would remain permanently in the Netherlands, and to develop a policy aimed at the equal participation of minorities in society. With the government's acceptance of these recommendations, the Dutch minority policy became a fact. In 1983 the government presented a Memorandum on minority policy. This Memorandum focused on immigrants as *groups*, explaining their disadvantaged social and economic position as a consequence of cultural differences (van Walsum 1998, 2). Minority policies would be designed to allow for cultural pluralism (for example, education for immigrant children in their native language) as a means to stimulate emancipation and integration. A strong legal position for immigrants was considered of paramount importance for furthering integration. Hence, in the 1980s many initiatives were taken to improve the legal position of immigrants, and to promote naturalization. On the whole, however, these policies were never based on a principled multiculturalism. Rather, they were based on a pragmatism that would later be labelled as multiculturalism in public and scientific discourse.

The consensus on minority policy that emerged during the 1980s broke down during the 1990s. Starting in 1991, with the famous Laren speech by the political leader of the VVD, Frits Bolkestein, Dutch minority policies became increasingly contested. The idea emerged that ethnic minorities had been treated too liberally; that they had been 'pampered' without imposing demands. Opportunities that had been granted to minorities in the enjoyment of certain 'cultural rights', were now considered to be an obstacle to integration. Consistent with the growing popularity of neo-liberal ideas in the 1990s more generally, the group approach was replaced by an individual approach. The emphasis was no longer on rights, but on the obligation of individuals as citizens. In 1998, so-called newcomer programmes were introduced, which required individual immigrants to take language and civic knowledge courses. During this period, ethnic minorities were renamed non-western *allochtonen* in political discourse.2

An influential essay by the Dutch publicist Paul Scheffer (2000) entitled ‘The Multi-cultural Tragedy’, the events of 9/11 2001, and finally the influence of the populist politician Pim Fortuyn gave rise to an atmosphere of increasing tension. In this atmosphere the idea emerged that minorities had not only been pampered, but that the integration of minorities had failed. Integration of non-western *allochtonen*, now referred to as ‘Muslims’, was no longer to be encouraged, but demanded. Immigrants had to express loyalty to the Dutch constitutional state and Dutch cultural norms and values. A lack of integration in individual cases may be sanctioned, to which end the Balkenende II government has developed several instruments. Such instruments include the obligations for non-western family members to integrate abroad, before and as a condition for joining their family in the Netherlands. Furthermore, a permanent residence permit will not be granted in cases where the integration standard is not met, and strict standardized exams of knowledge of the Dutch language and Dutch society have been introduced as requirements for naturalization.

Although this short description of the development of Dutch integration policies shows an obvious change, two features remain constant. The first is the idea that ‘good’, integrated immigrants can be ‘made’ through government policy. This feature fits with the long-standing Dutch tradition of educating citizens about the meaning of community and morality. The second constant feature is that culture is viewed as the cause of the problems that individuals and immigrant groups as a whole experience in relation to integrating into Dutch society. According to the scholar Jan Rath (1991), Dutch minority policy has constructed 'ethnic minorities' as a category of persons who are not considered fully-fledged members of the Dutch imagined community – a social construction that revolved around socio-cultural signifiers. This reasoning remained the starting point for the more individual and obligatory approach towards the integration of immigrants which has been developing since the 1990s. As we will see below, the construction of ethnic minorities as culturally and socially different has played an important role in the political and public debate on dual citizenship. Overall, dual citizenship was treated as a cultural issue, and as relevant only to ethnic minorities, which is arguably the reason why the possibility of holding dual citizenship as a rule was finally rejected.

**Nation**

Scholars typically distinguish a republican from an ethnic conception of nationhood (Brubaker 1992). A republican understanding of nationhood is based on the premise that government in a republic is in principle the common business of the citizens, conducted by citizens for the common good. The inclusion of all permanent residents into the nation is seen as a basis for civic-mindedness. Access to citizenship is based on the subjective avowal of loyalty to the nation on the part of individuals. In this sense republicanism strives to ensure an optimum of equal opportunities regarding political participation for all those residing within national boundaries. An ethnic understanding of nationhood also holds that government is based on popular consent and participation. In contrast to republicanism, however, the nation is focused on the idea of a common culture. Inclusion in the nation may then be traced to such factors as common descent, cultural tradition, shared language, and lineage (Faist this volume, chapter 1).

The Dutch scholarly standpoint overall is that the Netherlands lacks an elaborated concept of nationhood or national identity. That does not mean that it does not exist, but that it remains implicit. As several authors point out 'Dutch national identity has

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2 In this speech Bolkestein explicitly addressed the question whether an Islamic background was compatible with Dutch citizenship.

3 Officially, an *allochton* is any person of whom at least one of the parents is born abroad. The term *allochton* was first used by the scientific Council for Government Policy in 1989 and taken over by the government. Later, the distinction between western and non-western *allochtonen* became common.
no name, it exists expressly in the denial’ (Raad voor Maatschappelijke ontwikkeling 2003, 9). During the 1990s, however, a new feeling of Dutch nationhood surfaced, prompted by what the Dutch philosopher Baukje Prins (2003) calls the ‘new realism’. Prins mentions four features of the ‘new realism’: The author presents himself as someone who dares to face the facts about immigrants, and thus to speak frankly about facts that others have tried to cover up. Second, the author presents himself as a spokesperson for ordinary – autochtonous people. Third, his or her frankness is presented as ‘typically Dutch’, a feature of Dutch identity. The fourth feature is a resistance against the ‘left’ and its embrace of political correctness, which has attempted to ignore the problems associated with immigrants. Bolkestein and Scheffer can be considered as exponents of this ‘new realism’. This ‘new realism’ has not only influenced political and public debates, but also Dutch government policy. After 2001, it became commonplace for politicians to talk ‘openly and frankly’ (i.e. negatively) about immigrants. In 2003, the Blok Commission was installed at the initiative of the Socialist Party, tasked with studying not / but rather why integration of immigrants had failed.

During the 1990s subsequent governments placed new emphasis on republican traits, explaining the duties of active citizenship and loyalty to the Dutch constitutional state. This republican concept of nationhood can be found in the 2001 Government Memorandum ‘Integration in the Perspective of Immigration’:

Citizenship means having a part and participating in Dutch society as an autonomous person. Immigrants are offered sufficient possibilities to use their rights and to fulfil their social obligations, but they have to prove themselves. They have sufficient room to develop their identity and to express their religious beliefs and convictions about life, within the framework of our country. It can be expected of them to contribute actively to this modern, open and dynamic society. … Every resident of the country has to respect the fundamental values of society, as laid down in the constitution, laws and rules and the generally accepted opinions of society. The values are carried by all citizens and codified again and again in democratic decision-making processes. (Government Memorandum Integration in the perspective of Immigration 2001, 55 and 60)

Over the years, in the political and public debate and in government policy, ethno-cultural voices became more common. The thought was that immigrants from non-western cultures, due to the distance between their culture and Dutch culture, do not fulfill the requirements of good citizenship. Non-western immigrants are not deemed modern or open-minded, and do not share the fundamental values and generally accepted opinions of the common Dutch culture. The perceived task of the Dutch government is to teach immigrants the traits which make up a good citizen, and to accept and assume their individual responsibilities. Immigrants should first prove that they are worthy of becoming residents or citizens, that they are deserving of the rights of citizens. The obvious contradiction is that on the one hand the assumption is that non-western immigrants do not possess the traits of a good citizen, while on the other hand the Dutch government is perceived to have the task of teaching immigrants these very traits.

Increasingly, solutions are not only sought in liberal democratic principles, but also in valorizing a shared Dutch culture, putting the republican model of nationhood under pressure. The emphasis is not on political participation, but on cultural behaviour and norms. Solutions are sought not only in the public domain, but also in the private domain. The current government Balkenende II recently announced its intention to introduce a legal obligation for all immigrants (meaning those from outside the EU, newcomers and residents, citizens and non-citizens) to take a civic integration exam (inburgering). Financial incentives include a partial refund of the costs of the exam after it is successfully completed, and an administrative fine in the event of failure. The same line of thinking can be found in the integration plans of the respective political parties. The VVD, for example, suggests assigning a family guardian to immigrant families who do not speak Dutch at home and to limit their rights to educational choices for their children. D66 has argued for the withdrawal of Dutch citizenship from immigrants who have committed the crime of honour killing. Green Left has pleaded for a ban on marriage migration for husbands who have abused their wives.

To sum up, the trend since the beginning of the 1990s has been towards a gradually more expressive concept of Dutch nationhood, which is republican, with a strong emphasis on the obligations of immigrants and loyalty towards the Dutch constitutional state. Ethno-cultural voices have become stronger over the years, placing the emphasis on the obligations and loyalty of non-western immigrants, especially Muslims. Recently, the republican model seems to have come increasingly under pressure from these ethno-cultural voices.

Political Opportunity Structure

The described shift in thinking with regard to integration and nationhood was enabled by conditions within the political opportunity structure. Dutch political culture is characterized by a need to build consensus and reach compromises. The outcome of political decision-making processes, however, is not always the result of a true compromise in substance. Decision-making is not always based on policy which was adopted after careful preparation and consideration (Jacobs 1998, 261). In the period under scrutiny here, government coalitions were consecutively formed by the Christian Democrat CDA and conservative-liberal VVD (Government Lubbers I and II, 1982-1989), CDA and the Social Democrat PvdA (Government Lubbers III 1989-.

5 Memorandum on Integration of D66 ‘De anderen, dat zijn wij’ (The others, that is us), The Hague 2004-04-05, 9. The Dutch Citizenship Law 2000 only allows withdrawal because of criminal behaviour in case of war crimes (genocide) and if the Dutch citizenship was obtained by fraud (Article 14).
the government. The elections which followed the swift demise of the government Balkenende I diminished the LPF to eight seats in parliament. Despite the absence of Pim Fortuyn himself, and the fact that the LPF has been reduced to the ranks of the smaller parties in parliament, the impact on Dutch politics remains considerable. The political establishment was severely shaken by the initial election results in favour of the LPF. Politicians were left wondering about the underlying causes of this development and where they had failed in the perceptions of the public. They responded by accepting the answer that Fortuyn had provided before his death: so-called regentenpolitiek – a style of ‘old’ politics that failed to listen to the public and to learn what the people wanted. Part of this criticism was that politicians had ignored the problems of a multicultural society. The adoption of a discourse founded on the frankness and openness of ‘new realism’ in discussing societal problems, especially when touching upon immigration matters, presented a survival technique for politicians. Although some parties were affected more than others, parties across the political spectrum were required to adapt to the new political reality. This led to a clear change in the manner in which immigrants figured in political and public discussions.

**Method and Material**

Several sources were used in this study. The most important source consisted of the records of parliamentary debates concerning the issue of dual citizenship during the period 1980-2004. Debates on the introduction of legislation to amend the Dutch Citizenship Law were reviewed, as well as debates on dual citizenship unrelated to legislation or amendments of the law (such as for example the expulsion of imams and of Moroccan-Dutch juveniles after 2001). Also included were debates on the relevant international conventions.7

Reports of governmental advice councils and NGOs, which were mentioned in the above parliamentary debates, provided a second source of information. Reports by the media constituted a third source. A total of 289 articles from Dutch nation-wide newspapers during the period 1991-2003 were covered.8 All articles with reference to the issue of dual citizenship were included, even where dual citizenship was not the main topic. In addition to articles pertaining to the situation in the Netherlands, articles on dual citizenship in Germany were also reviewed. As it turns out, the debate in Germany was one of the three main topics covered by the newspapers (55 articles).

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8 Newspapers included in the analysis were NRC, De Volkskrant, Algemeen Dagblad, Parool and Trouw. Of the largest newspaper, De Telegraaf, only the years 2002-2004 were covered, as it was not included in the databank system that I used (Lexis-Nexis).
Political Debates: Upholding the Renunciation Requirement (1985-1990)

A regulation for naturalization adopted in 1977 already allowed for exceptions to the renunciation requirement, formalizing an existing practice. Article 3 of the regulation stipulated that renunciation would not be required in cases where this ‘cannot reasonably be expected’. The government clarified this provision by contending that it was aimed at situations where renunciation would have unnecessarily harsh consequences, such as for example where persons were faced with a moral dilemma, would experience problems of subsistence, or had grounds to be reluctant to contact the authorities of their country of origin (refugees).9

The discussion of the political debates starts with the amendment of the Citizenship Law in 1985, when the Netherlands amended their Citizenship Law and simultaneously ratified the 1963 Strasbourg Convention on the reduction of cases of multiple nationalities and on military obligations in cases of multiple nationalities.10 Although the Strasbourg Convention was aimed at the prevention of multiple nationalities, multiple nationalities became more frequent as a result of the Citizenship Law of 1985. It allowed for dual citizenship of children of mixed marriages who, from 1 January 1985, not only obtained the citizenship of the father, but also the citizenship of the mother at birth. The government did not consider that this amendment contradicted the objective of preventing multiple nationalities, but rather sought to give weight to the principle of gender equality. The objective of prevention of dual citizenship was left to the individual, who now had to exhibit responsibility and a willingness to make a conscious choice in this regard. None of the political parties disagreed with the equal treatment of men and women. The PvdA inquired whether it would be advisable to require the child choose one or the other citizenship upon majority, in order to limit the frequency of dual citizenship.

For the second generation of immigrants, a right of option for Dutch citizenship was introduced. The second generation could acquire Dutch citizenship by a simple, unilateral declaration between the ages of 18 and 25, without costs or further requirements. The right of option also meant that the second generation of immigrants were not required to renounce their former citizenship. The third generation of immigrants have been Dutch by birth since 1953, when the jus soli basis for acquiring Dutch citizenship for the third generation of immigrants was introduced. Although the government wanted to replace this by an option right, the majority in parliament, including the conservative liberal VVD and Christian Democrat CDA, opposed this proposal and the third generation thus continued to acquire Dutch citizenship automatically.

Despite these amendments, which led to a growing number of persons with multiple nationalities, the government expressly opposed multiple nationalities in the case of naturalization. An immigrant who wanted to be naturalized had to renounce the

10 Tweede Kamer 16 946 (ratification of the convention) and 16 947 (citizenship law).
emigrants expressed their wish to retain Dutch citizenship by sending countless letters to parliament. The Dutch lawyer MacKaay (1983), working and living in Canada, wrote an oft-cited article in the prominent Dutch legal journal, Nederlands Juristenblad, pleading for the acceptance of dual citizenship for Dutch emigrants. The PvdA and the small left-wing parties submitted motions allowing for dual citizenship for both immigrants and emigrants, but these motions were rejected.

The Citizenship Law of 1985 upheld the renunciation requirement, except in cases where 'this cannot reasonably be expected' (Article 9, Section 1, Sub b). In practice, a policy was developed that allowed for a number of exceptions. Renunciation was not expected of persons who could not waive their former citizenship because their other country of citizenship did not allow it. In 1987, the head of the department of Citizenship and Civil Status of the Ministry of Justice specifically mentioned Moroccans, Greeks, Iranians, and East Europeans as such citizenship groups. Another reason for exemption was a resulting loss of inheritance or property rights in the country of citizenship. At the time, this applied to Turkish immigrants and persons from Yugoslavia. Turks and Moroccans were the two major immigrant groups in the Netherlands. Exceptions like these were dealt with rather leniently. As a consequence, in the period before 1990 around 40 per cent of the immigrants who were naturalized were able to retain their original citizenship (Zilverentant 1987).

Abolishing the Renunciation Requirement (1990-1991)

The renunciation requirement became an issue of discussion again a few years later. In 1989, the Scientific Council for Government Policy WRR, recommended allowing dual citizenship for immigrants in its report 'Allochtonenbeleid' (Immigrant Policy 1989, 93-6). The WRR criticized the earlier minority policy and urged the government to promote the social integration of immigrants, which required the improvement of immigrants' legal positions. Hence, naturalization should not be made more difficult than strictly necessary. The council was of the opinion that legal and emotional considerations in not renouncing the old citizenship (yet) should be taken into account as much as possible. The council recommended consideration of the 'real objections' for persons of 'some Mediterranean countries'. The WRR report played an important role in opening up the discussion on dual citizenship. Initially, the Lubbers III government (PvdA and CDA, 1989-1994) rejected the recommendation to allow dual citizenship. The government thought it important to stimulate long-term immigrants to obtain Dutch citizenship without unnecessary difficulty, but did not advocate dual citizenship. The government pointed to the legal objections against dual citizenship and stated that only in individual cases could exceptions be made.

After questions from members of parliament, the government revised this position in a 'Memorandum on multiple citizenship and voting rights for immigrants'. In this memorandum, the government proposed the total abolishment of the renunciation requirement. It was considered a barrier to the naturalization of immigrants, for emotional factors relating especially to a sense of betrayal of, or breach with, the country of origin. It is important to note that the government did not fully support dual citizenship. It described its policy as a shift from the prevention to the limitation of dual citizenship. Since naturalization was now perceived as an adequate means to stimulate integration, this meant that voting rights for immigrants would not be expanded to the provincial and national level. In this sense, the memorandum was a compromise between the CDA and PvdA – the CDA gave up its earlier objections against dual citizenship; in exchange, the Social Democrats had to sacrifice their wish for the extension of voting rights for non-Dutch immigrants in parliamentary elections. Furthermore, the government rejected the introduction of a special law for equal treatment of immigrants. Immigrants who wanted full equal treatment had to naturalize. Hence, the government's 'embrace' of dual citizenship entailed a rejection of the so-called 'denizen-status' or postnational membership for immigrants (Faist, this volume, chapter 1; Soysal 1994).

The government's proposal met with resistance in parliament.12 The conservative liberal VVD and the small protestant parties resisted dual citizenship altogether, although the VVD favoured a relaxation of the naturalization procedure. The Christian Democrats had serious doubts and were divided on the issue from the start. In 1990, the CDA spokesman for minority policies stated that the party did not have objections in principle to dual citizenship. Less than a year later he claimed that the CDA had always held the opinion that dual citizenship was highly problematic. The party favoured relaxation, but not abolishment of the renunciation requirement. In the same period, the journal of the party published an article supporting the plans to abolish the renunciation requirement.13 In parliament, the CDA expressed sympathy for the problems that the renunciation requirement was causing for individuals. But the party was also concerned about conflicts of loyalty, and considered it the government's responsibility to protect immigrants from such conflicts. The other government party, PvdA, advocated dual citizenship. They saw it as an instrumental means to integration, but also pointed to the inequality between various immigrant groups: some were allowed to have dual citizenship, while others were not. The PvdA expressed time and again the opinion that the world had changed because of globalization and migration. Mixing loyalties and ties with more than one country had become a possibility in such a context.

The CDA and PvdA finally agreed on a compromise, formulated in a motion that in fact was ascribed different meanings by each party.14 For the CDA the motion confirmed that the renunciation requirement would continue to exist, but would be applied more leniently. The PvdA explained the motion as providing the possibility

for an individual immigrant to choose, if desired, whether to hold on to or rescind the original citizenship. The State Secretary of Justice (Kosto, PvdA) agreed with the interpretation of the PvdA. He saw no difference between the government’s memorandum and the motion. Aware of these differences in interpretation, PvdA, CDA, D66, and Green Left nonetheless accepted the motion. The abolishment of the renunciation requirement was introduced by changing the related policy with immediate effect, awaiting the necessary amendment of the Dutch Citizenship Law. Thereby, renunciation was no longer required in practice from 1 January 1992. It must be mentioned, however, that this amended policy applied only to immigrants. While immigrants were allowed to retain their former citizenship upon naturalization, Dutch emigrants still automatically lost Dutch citizenship upon naturalization abroad.

The effects of the new policy differed among the main immigrant groups in the Netherlands. For Turkish immigrants, the change in policy was of significance, as is illustrated by the increase in the numbers of naturalizations within this group. The situation for Moroccans, on the other hand, did not change as a result of the new policy. Since Morocco did not allow its citizens to waive their citizenship, Dutch citizenship law had already exempted them from the renunciation requirement before 1992. For persons from the former Dutch colony of Suriname there were no changes either, since Surinamese citizenship law caused the automatic loss of citizenship upon naturalization elsewhere.


The government put forward legislation in order to formalize the new policy of 1992. It presented this legislation, holding the proposal of dual citizenship for immigrants, within the context of minority policy. After the Council of State, in its advice concerning this legislation, pointed out that this would imply the unequal treatment of Dutch nationals, the government also included dual citizenship for Dutch emigrants. The political debate, however, focused on immigrants and on the whole neglected the interests of Dutch emigrants. In clarifying the legislation, the Lubbers III government posited citizenship as an expression of connection, and not of undivided loyalty. In short, a person could have a bond with more than one country. Relations with a country could be political, social, economic, cultural, and emotional. The government expressed a rather vague notion of citizenship and nationhood:

The question whether and to what extent the existence of these relationships is required cannot be answered in general terms. Which rights and obligations should be connected to the possession of Dutch citizenship cannot be answered either.15

Since the government did not perceive citizenship in ideological terms, room was left for a highly pragmatic, instrumental view of dual citizenship. Dual citizenship would provide an answer to the objections of immigrants against naturalization and thus further their integration. Integration and minority policy were considered most important. However, we should not neglect the more principled argument behind this pragmatic approach, namely that social integration of immigrants required a secure legal position.

During the following years, parliamentary discussion reflected the fact that opposition against dual citizenship grew stronger and the policy of 1992 became increasingly contested. The CDA and VVD expressed their objections against dual citizenship in increasingly explicit terms. They saw the rising numbers of naturalization not as a sign of success of the new policy, but as proof that abolishment of the renunciation requirement had made naturalization into a mere ‘paper’ formality. It allowed naturalization for people with very weak connections to the Netherlands. From this perspective, naturalization ought not to be a means for, but rather the ‘crowning’ of a completed integration process. The VVD feared that immigrants made instrumental use of dual citizenship and would collect nationalities as one would collect diplomas or credit cards. It would allow them to ‘shop around’ to see where they might be best off.

On the opposite side were PvdA, D66, and Green Left, who viewed dual citizenship as a means to further integration. This pragmatic, instrumentalist view of dual citizenship, however, focused on the cultural and social integration of immigrants rather than the political participation of immigrants. The Green Left was the only party that regularly put forward the issue of political participation, although PvdA and D66 still upheld their wish for the extension of voting rights for non-naturalized immigrants and would continue to do so up until 1997.

More and more, dual citizenship came to be viewed as an expression of ethnic and cultural identity. The left-wing parties and the Christian Democrats expressed sympathy for the emotional and cultural problems of immigrants when renouncing their original citizenship. This led to a certain degree of culturalism: culture was perceived as essentialist, primordial, homogeneous, objective, and connected to the common descent of a certain group (Tempelman 1999). The attitude of immigrants towards dual citizenship was explained primarily through their ethnic and cultural background. This culturalist approach can partly be understood by the fact that the discussion on dual citizenship started within the context of minority policy and its focus on ethnic and cultural difference. The PvdA and Green Left tried to present a more dynamic, multiple view of cultural identity. They held that a person could feel connected to two countries, and that immigrants who did not feel themselves ‘fully-fledged’ Dutchmen could still be socially integrated. Despite the efforts of these parties, the discussion remained focused on issues of cultural identity. Hence, dual citizenship became a cultural issue and seemed of importance only for certain non-western groups with a distinct culture, and not, or less so, for others.

In the same period, attention to the interests of Dutch emigrants grew. In 1995, the first Dutch emigrants lost Dutch citizenship as a consequence of the Citizenship Law of 1985. The government amended the provision of automatic loss of Dutch citizenship upon naturalization abroad, allowing for the retention of Dutch citizenship. Dutch emigrants ‘bombarded’ MPs with letters, as they had done before in the 1980s,

pleading for the possibility of holding dual citizenship. Both left- and right-wing parties were in favour of dual citizenship for Dutch emigrants. The VVD, CDA, and SCP opposed dual citizenship for immigrants, but did not oppose dual citizenship for Dutch emigrants. The VVD at one point claimed to reject dual citizenship for Dutch emigrants. At another moment in the discussion, however, they tried to extend the exceptions for Dutch emigrants, allowing for dual citizenship. The left-wing parties also spoke out on behalf of Dutch emigrants. For these parties, however, the case of Dutch emigrants mainly presented an argument in pleading for dual citizenship for immigrants. If one did not oppose dual citizenship for Dutch emigrants, so they put it to the right-wing parties, how could one oppose dual citizenship for immigrants?

This argument for equality had been successful in leading to acceptance for dual citizenship in Sweden (Spång this volume, chapter 4). But it did not work in the Netherlands. The CDA and VVD saw dual citizenship of Dutch emigrants and immigrants as two separate matters. The VVD claimed it was the responsibility of the receiving country of Dutch emigrants to allow or ban dual citizenship. The CDA claimed that Dutch emigrants did not pose an integration issue. This last argument seemed the prevailing one. Placing arguments on dual citizenship within the rubric of integration made it possible to view the matter as two distinct issues. The objections raised against dual citizenship for immigrants were never mentioned in the debates on Dutch emigrants. The wish of Dutch emigrants to retain Dutch citizenship was never questioned, regardless of the motives involved, whether these were instrumental (loss of social security rights) or emotional.

Finally, although reluctantly, the Second Chamber accepted the new legislation. In the Senate, however, opposition was even stronger, and in fact the Secretary withdrew the bill before it would be rejected. This can be explained by several factors. The first lay in the political process. The VVD and CDA held a majority in the Senate. Since the CDA had become an opposition party in 1994, they no longer felt committed to the compromise they had reached some years earlier with the PvdA in the Lubbers government. The second factor was the growing media attention. For the first time since the political discussion on the renunciation requirement had started, the media paid serious attention to the outcomes of the debate. This attention focused on the political process. The ‘shift’ or ‘turn’ of the CDA in particular received a lot of attention and was heavily criticized. Politicians also took the political discussion into the public arena, by writing articles of opinion for the newspapers. Hence, as the issue became more publicized than before, the stakes for politicians increased.

The outcome of the discussion was also influenced by the publication of the yearly Social Cultural Planning Bureau’s (SCP) report on minorities (SCP Rapportage Minderheden) in 1996. In two pages devoted to naturalization, the SCP report published statistics that showed a considerable rise in naturalizations since 1990, most significantly by Turkish immigrants. The sections on naturalization were based on an earlier study on the subject that had been published in 1993, after the

16 The SCP was established by the government in 1973, tasked with conducting studies to provide information for the development of effective government policies.

renunciation requirement had already been abolished (van den Bedem 1993). At the
time, the study received little attention. Now, however, the SCP report coincided with a heated political debate. The report questioned the assumption that naturalization was an indicator of the degree of integration of immigrants. According to the SCP, naturalization was the result of a balancing of advantages and disadvantages and had little to do with feelings of connection or social integration into Dutch society. Politicians referred frequently to the report during the 1996 debate. The opponents of dual citizenship saw their objections confirmed by the study’s findings that immigrants who were said not to feel Dutch nevertheless had the option of naturalization open to them. The report seemed to confirm their idea that naturalization had become too easy. Of the advocates of dual citizenship, the Green Left, claimed that feeling Dutch was not the same as feeling connected to Dutch society. The government indeed denied that it was necessary to feel Dutch in order to become Dutch.

As the resistance against dual citizenship grew, the first government of the PvdA, VVD, and D66 (1994-1998) was forced to formulate the meaning of citizenship more explicitly. It resulted in the presentation of new arguments for a law that had in itself remained the same. Although the State Secretary of Justice (Schmitz, PvdA) still defended the proposed abolishment of the renunciation requirement, she did so with more restraint than before. She stated that dual citizenship should not be automatic, and that having only one citizenship was preferred. Immigrants should not choose dual citizenship without good reason and the authorities were to make sure that the choice for dual citizenship was a conscious and explicit one, although they were not required to evaluate the underlying motives as such. The State Secretary did not succeed in overcoming the objections against the legislation. Finally, in 1997, she withdrew it. The renunciation requirement was reinstated the same year, but the ministerial circular that reinstated it contained an even larger number of exceptions than before 1992. Their scope was so broad that the exceptions applied to a large percentage of the immigrants applying for naturalization.

Reinstating the Renunciation Requirement (1997-2001)

After the government had withdrawn the bill allowing dual citizenship, a new bill was drafted and sent to parliament. It contained a limited relaxation of the renunciation requirement, including the categories of persons contained in the Second Protocol of the Strasbourg Convention (partners and children of mixed marriages and second-generation immigrants). In defence of the new legislation, the government used mainly the same arguments that earlier supported the abolishment of the renunciation requirement, which were now justifying a relaxed ‘renunciation-unless’ policy.


During the discussion on the revised bill, the larger political parties developed a more restrictive attitude towards naturalization in general, especially with regard to requirements concerning knowledge of the Dutch language and society. They
stressed the importance of Dutch citizenship and did so in ethnic and cultural terms. During this period, the term ‘loyalty’ was used frequently. The CDA expressed the opinion that Dutch citizenship should be the object of pride, and should not be appropriated or discarded like an article of consumption. One had to feel Dutch.

The CDA stressed the importance of loyalty and voted against the bill, while they considered the stricter standards for naturalization still too low. The discussion on language requirements resulted in the addition of a strict test of Dutch language skills and knowledge of Dutch society as a requirement for naturalization.

Whilst making it harder for immigrants to acquire Dutch citizenship, the legislation allowed for more possibilities to retain Dutch citizenship for Dutch emigrants. It abolished the rule stipulating the automatic loss of Dutch citizenship upon reaching majority after ten years of residence in the country of the other citizenship. Dutch emigrants who had lost their Dutch citizenship as a result of the Citizenship Law of 1985 could now re-obtain it under easier conditions. In addition, Dutch men and women who apply for the citizenship of their partner will no longer lose Dutch citizenship.

The new legislation was adopted in December 2000 and came into force on 1st April 2003. Although dual citizenship is still possible in many cases, acquisition of Dutch citizenship has become more difficult. Hence, the discussion on dual citizenship, which started with the intent to improve the legal position of immigrants, resulted in a new Citizenship Law that weakens this legal position in several respects, while it has become easier for Dutch emigrants to have dual citizenship.

Still, the question is whether anything had really changed after all the developments described here. After dual citizenship had been allowed in 1992, naturalization rates rose considerably. After the renunciation requirement was reinstated in 1997, naturalization rates did not drop, with the exception of Turkish immigrants. As before, most naturalized immigrants retained their original citizenship. Between 1995 and 1997 more than 80 per cent of those naturalized retained their original citizenship. In 2000, after the renunciation requirement had formally been reinstated, 77 per cent of the immigrants retained their original citizenship (Böcker and Tränhardt 2003).

Based on this small decrease of three per cent, it would not be unreasonable to conclude that politicians had spent ten years fighting windmills.


After the adoption of the new Citizenship Law of 2000 the discussion on dual citizenship continued. It also became more public.

In the period after 9/11 and after the LPF had become a government party, dual citizenship came to be seen in a new way: as a chance to expel undesired naturalized immigrants who could be stripped of their Dutch citizenship. Dual citizenship offered an opportunity here. One example is the debate in 2002 on the expulsion of Moroccan-Dutch juveniles who had committed criminal offences. The debate started with an interview in a major newspaper by Minister of Immigration and Integration Nawijn (LPF) of the short-lived Balkenende I (CDA, VVD, LPF) government. He suggested withdrawing Dutch citizenship from these juveniles, so that they could be expelled to Morocco. He saw dual citizenship as posing a problem to integration, and considered withdrawing Dutch citizenship as an appropriate way to crack down on criminality among Moroccan-Dutch youth. Nawijn’s suggestion met with a lot of criticism in the media and in the Second Chamber. Prime Minister Balkenende (CDA) distanced himself publicly from these statements and privately rebuked the minister. His main argument in rejecting Nawijn’s plan was the constitutionally guaranteed equal treatment of all Dutch citizens.

Although Nawijn’s suggestion never materialized, it illustrates an important change in thinking on dual citizenship. The idea is that immigrants, although naturalized or perhaps even born with dual citizenship, can be expelled to the country of origin because they did not behave according to Dutch cultural norms and values. It treats Dutch nationals differently based on their lineage. This line of thinking on dual citizenship reappeared in debates on imams who were thought to be working against the integration of immigrants, and in the proposal to withdraw Dutch citizenship from dual citizens convicted of honour killing.19

The first months of 2004 witnessed a re-opening of the debate on dual citizenship. The CDA submitted a motion, together with Hirs Ali (VVD) and Nawijn (LPF), requesting the government to amend the law, so that allochtones from the third generation could have only Dutch citizenship. The motion was accepted with the support of the VVD, CDA, Christian Union, SGF, and LPF. The publication of the report of the Blok Commission, which evaluated Dutch minority policy, proved a further incentive to re-opening the debate. During the weeks surrounding the report’s publication, all parties presented integration plans, containing inter alia positions on the issue of dual citizenship. Only the PvdA and D66 still jointly supported dual citizenship. The Green Left did not want to ban dual citizenship. Although initially the Ministers of Justice and Alien Affairs and Integration stated that a legal regulation stipulating that third-generation allochtones may have only Dutch citizenship would be a breach of international law, the ministers also promised a memorandum on citizenship issues and dual citizenship, and a reconsideration of the renunciation requirement of Article 9 section 1b of the Citizenship Law.20 Later, in the government reaction to the report, Minister Verdonk of Immigration and Integration (VVD) said that she not only wanted to ban dual citizenship for the third generation, but found dual citizenship undesirable more generally, because it would undermine integration. She announced plans to combat dual citizenship.

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18 In case the immigrant had only Dutch citizenship, de-naturalization was not allowed because of international conventions against statelessness and because it would become impossible to expel a stateless immigrant.

19 For example the debate about an Amsterdam mosque that distributed books with homophobic texts. Handelingen Tweede Kamer, 2004-04-28, 72-4714.


The Influence of Experts, NGOs, and Jurisprudence

In reviewing the influence of NGOs on the debate on dual citizenship, it is important to note that, in the Netherlands, issues around immigration and integration are generally addressed by immigrant organizations, and far less by the broader non-immigrant organizations such as trade unions. Only one non-immigrant organization, the Dutch Legal Committee for Human Rights (Nederlands Juristen Comite voor de Mensenrechten), was active with regard to the issue of dual citizenship. The NJCM report (1992), advocating the possibility of dual citizenship, did not play any role in the debate in parliament. This lack of attention by non-immigrant organizations turned dual citizenship into an issue for experts, and not for the general public. The Dutch Centre for Foreigners published a report on the law of 1985, D66 in particular used this report as an argument to plead for dual citizenship. In the 1990s, only the Turkish Immigrant Organisation (IOT), the official representative of the Turkish community to the Dutch government, was notably active on the issue of dual citizenship. While representing one of the largest immigrant communities they had a clear interest in the matter. The IOT wrote reports in 1990 and in 1996, arguing, respectively, for the abolition of the renunciation requirement, and against the reinstatement of the renunciation requirement and extension of the range of exceptions to renunciation (IOT 1990 and 1996). The main influence of this organization was felt in 1991 and on a more informal political level, when they advised Prime Minister Lubbers (CDA) on how to argue against the objections of his party members with regard to dual citizenship. In 1996 IOT successfully campaigned for the exception that allows an applicant to retain the original citizenship in case of having to serve in the army in his country of origin. This became one of the total of 13 exceptions which were eventually accepted by parliament in 1997. The activities of immigrant organizations were mentioned in parliament on occasion, but not nearly as frequently as were the ‘thousands of letters’ of Dutch emigrants. The parties that opposed dual citizenship attempted to minimize the influence of minority organizations by claiming that ‘signals’ emanating from minority groups were insufficient in number or unclear.

The influence of immigrants became visible through the involvement of those MPs of immigrant background in the PvdA, the Green Left, and even in the populist LPF, who were all active participants in the debates in the Second Chamber.

The influence of case-law has been very limited. One exception is the Micheletti decision of the European Court of Justice, which instigated a change in the regulation of loss of Dutch citizenship. The government revised Article 15 of the draft Citizenship Law, to determine that Dutchmen who were also members of another EU member state and had taken up residence in that member state for a period exceeding ten years would not lose Dutch citizenship.23 Herewith, a further group of citizens was allowed to hold dual citizenship.

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23 Article 15, Section 1, Sub c Dutch Citizenship Law 2000.

The Media Debate on Dual Citizenship

Although it must be born in mind that the media debate that took place in the Netherlands on the issue of dual citizenship was not as fierce, for example, as it had been in Germany, two periods of relatively intense media attention may be distinguished: at the height of the legislative process in 1995, and at the time of discussions surrounding the issue of the expulsion of Moroccan-Dutch juveniles in 2002. The media debate on the latter issue was not highly polemical. In 1995, attention was focused not on the substance of arguments concerning dual citizenship, but rather on the political process and the position and attitude of political parties during the parliamentary debate. The first bulk of articles in the media concerned this political process.

Second, the Dutch media paid a lot of attention to the debate in Germany concerning the amendment of its citizenship law. As mentioned above, the situation in Germany with respect to dual citizenship was one of three major topics that featured in the Dutch media. News articles described the German debate as highly polemical and populist. A central issue was how Germany perceived itself: was it an immigration country or not, a society based on ethnicity or openness, a modern nation or a country with a nineteenth-century orientation, upholding a Blut und Boden citizenship law. Remarkably, the Dutch press went to great lengths to address the degree of ethnic connotations that characterized the German debate on citizenship law, while it mostly disregarded the ethnonationalism in the Dutch debate.

Instead, the Dutch media presented the Dutch debate on dual citizenship as a debate on integration. Both in general news reports and expert opinions, the assumption was that true integration of immigrants had not yet started. Even those authors who advocated dual citizenship claimed it would help immigrants ‘to grow into Dutch society’24 or to ‘slowly move from one national and cultural identity into another’.25

The media dealt with the issue of dual citizenship from the perspective of Dutch society. The interests of persons directly affected by the rules on dual citizenship, immigrants and Dutch emigrants, were hardly addressed. Only the topic of military service was reported from the perspective of dual nationals, especially Turkish young men. During the period under consideration, a small number of articles focused on the problems of individual immigrants with dual citizenship. These pertained to the situation in the country of origin, where persons faced risks ranging from military draft, arrest, torture, or execution. The large number of letters from Dutch emigrants which landed at the doorstep of the parliament escaped media attention almost

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24 Wil Tinnemans (expert) (1996-07-03), ‘Dubbele nationaliteit laat allochtroon in ons land ingroeien’ (Dual citizenship allows allochtnes to grow into being part of our country), De Volkskrant.

25 Arnold Koper (columnist) (1995-05-20), ‘Geadk denk gewaard als paspoort niet gevraagd’ (Thank God a passport was not asked for), De Volkskrant.
Conclusions

Although immigration is often mentioned as one of the important factors leading to a more liberal approach to dual citizenship (Faist this volume, chapter 1), the Dutch case shows that this is not necessarily the case. In the Netherlands, the initial trend towards total acceptance of dual citizenship was replaced by a policy of ‘renunciation unless’. As we have seen, the large number of exceptions still allows for dual citizenship in about three quarters of all naturalizations. The New Citizenship Law which came into force in 2003, however, has made access to Dutch citizenship much harder for immigrants. The first statistics on the revised Dutch Citizenship Law show a considerable drop in the numbers of naturalizations of about 40 per cent, which is likely due to the required computerized test of Dutch language and knowledge of Dutch society. In 2004, the decrease will likely be even more dramatic. We have also seen that at the same time dual citizenship has become more accessible to Dutch emigrants. Explanations for these contradictory results have been sought in the development of Dutch integration policies. The issue of dual citizenship was discussed within the ‘integration’ belief system. The result was that arguments used for and against dual citizenship which focused on the issue of integration excluded the interests of Dutch emigrants, which did not fit within this belief system.

Second, placing arguments within the integration belief system meant that change from a pragmatic cultural pluralist approach to a more principled assimilationist approach impacted policy concerning dual citizenship. Acceptance of dual citizenship as a rule did not agree with an assimilationist approach. As indicated, the shift in integration policies can be explained by the changing concept of nationhood. For a long time, the Netherlands had what was considered an ‘empty’ concept of nationhood. This ‘empty’ concept of nationhood left room in the 1980s for a fluid policy and for a pragmatic approach to the subject of dual citizenship. In the late 1990s the expressive dimension of citizenship gained importance. It became expressly republican, with a strong emphasis on the obligations of citizens. At the same time, it was strongly connected with the discourse on minority policies that focused on the cultural identity of immigrants. This combination of republicanism with increasingly strong ethno-cultural voices explains why the policy of acceptance of dual citizenship was left in 1997, and why access to naturalization has been made harder.

That the still relatively liberal practice of dual citizenship of ‘renunciation unless’ could be preserved and that the government did not choose an even more restrictive policy may be explained by the political opportunity structure. The PvdA

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26 6 articles between 1993-1996.
27 To fulfill the new strict Dutch language requirement for reading, writing, speaking, and comprehension applicants are subjected to a three-hour test in an educational institution.
sending a message to voters that the parties were tough on immigrants. But more likely their attitude could be perceived as pragmatic, since to a large extent the incidence of dual citizens could not be prevented.

This does not mean, however, that polemics and populism were entirely absent from the Dutch political debate. The discussion on dual citizenship could be seen as part of this more general debate. The new consensus seems to be that integration policies had failed and a new and ‘ firmer’ handling of ethnic groups was necessary. In the period after 2001 in particular, the debate on dual citizenship became more public.

The new emphasis on the obligations of citizens instead of on rights is not limited to immigrants, but also extends to criminality, social security, public order, and so forth. This can be explained by the growing popularity of neo-liberal ideas in the 1990s. The rediscovery of the ‘citizen’ in Dutch politics was above all about the citizen as a moral being, more than as a political participant (Koenis 1997, 20). This moral citizen fits with a long Dutch tradition of educating citizens, including immigrants, to community and morality (Rath 1991). Recent developments have re-opened the debate on dual citizenship. It is too early to speculate about how this will work out in the future.

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Non-Governmental Organizations

Chapter 4

Pragmatism All the Way Down?
The Politics of Dual Citizenship in Sweden

Mikael Spång

Abstract

This chapter gives an overview of the policy process and the political debate leading up to the acceptance of dual citizenship in Sweden in 2001. Understandings of state and nation, integration policies, and features of the political system are explored in order to explain the policy output. In my view the following factors are important for explaining the acceptance of dual citizenship in Sweden:

1. the extensive de facto toleration, together with minor differences between denizens' and citizens' rights and obligations, which are related to central features of immigrant integration policies;
2. the simultaneous focus on denizens in Sweden and Swedish nationals abroad and the stress on treating them equally in the 1990s debate; and
3. the combination of consensus and bloc politics, which delayed acceptance in the 1980s and early 1990s, but facilitated agreement on changing the law in the late 1990s.

Introduction

Dual citizenship has been a legally recognized option in Sweden since 2001 (SFS 2001, 82). This represents a change of principles and at the same time an acknowledgment of an already existing practice. Swedish citizenship legislation has since the first naturalization regulation of 1858 been based on the principle of avoiding dual citizenship, but from the late 1970s an extensive de facto toleration developed, leading by the late 1990s to the acquisition of dual citizenship by about 300,000 individuals (Sandesjö and Björk 1996, 19ff.; SOU 1999, 34, 173ff.).

De facto toleration developed because of changes to the citizenship law, relaxed naturalization requirements, and administrative exemptions from the requirement of renouncing one's original citizenship when becoming a Swedish national (cf. Szabó
Dual Citizenship in Europe
From Nationhood to Societal Integration

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