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INVESTIGATING MULTIPLE CITIZENSHIP IN INTERNATIONAL RELATIONS RETHINKING GLOBALISATION, NATION-STATES AND SOCIAL CONTRACT

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Abstract

Multiple citizenship was once thought to signify disloyalty to the nation-state and threaten the sovereign international system, hence considered an aberration that should be limited. However, International Relations is in the process of reconceptualising its approaches and moving away from state-centrism so that it may better address the challenges of a transnationalising world. Examining the concept of multiple citizenship provides an opportunity to expand IR research agendas and transnationalise IR theory. Employing a multidisciplinary literature review, this article identifies the possible ways through which investigating multiple citizenship can contribute in advancing the discipline's theorisations. Firstly, it contends that an analytical focus on multiple citizenship enriches IR theory by re-examining concepts which have not been adequately questioned in traditional IR and enabling deterritorialisation of the sovereign nation-state, de-conflation of the nation from the state, and reconsideration of the relationship between citizens and nation-states. Secondly, multiple citizenship can serve a base for considerations about globalisation and the future of the nation-state; it can also be used to obtain glimpses into issues, which may affect larger portions of the global population in the future. This article concludes by arguing for more serious probe to the concept of multiple citizenship in IR.

Keywords

Dual citizenship; transnationalism; globalisation; nation-states; sovereignty

Abstrak

Kewarganegaraan jamak pernah dianggap menandakan ketidaksetiaan kepada negara bangsa dan mengancam sistem internasional yang berdaulat, sehingga dianggap sebagai ketidaknormalan yang harus dibatasi. Namun demikian, ilmu hubungan internasional sedang dalam proses mengonseptualisasikan kembali pendekatan-pendekatannya dan beranjak dari kecenderungan negarasentris untuk dapat menanggapi tantangan dari dunia yang semakin transnasional dengan lebih baik. Konsep kewarganegaraan jamak membukanyediakan kesempatan untuk memperluas agenda riset HI dan men-transnasionalisasi-kan teori HI. Melalui literatur multidisiplin untuk kemungkinan-kemungkinan di mana investigasi terhadap konsep kewarganegaraan jamak dapat berkontribusi pada usaha memajukan teorisasi HI. Pertama, artikel ini mengajukan pandangan bahwasanya fokus analitis terhadap kewarganegaraan jamak memperkaya teori HI dengan mengamati kembali konsep-konsep yang selama ini belum dipertanyakan secara saksama dalam pemikiran HI tradisional dan memungkinkan deterritorialisasi negara-bangsa yang berdaulat, dekonflasi antara bangsa dari negara, serta rekonsiderasi hubungan antara warga negara dengan negara-bangsa. Kedua, kewarganegaraan jamak dapat dimanfaatkan sebagai titik dasar dalam rekonsiderasi terhadap globalisasi dan masa depan negara-bangsa; pengamatan terhadap konsep ini juga dapat memberikan kilasan terkait isu-isu mungkin memengaruhi lebih banyak kalangan dalam populasi global di masa depan. Dalam kesimpulannya, artikel ini menganjurkan pendalaman yang lebih serius terhadap kewarganegaraan jamak dalam ilmu HI.

Kata kunci

Kewarganegaraan jamak; transnasionalisme; globalisasi; negara bangsa; kedaulatan

INTRODUCTION

The idea of multiple citizenship is still traditionally linked to connotations of aberration where an individual cannot be matched neatly with a single country, or bigamy in regard to national allegiance. In international relations particularly, multiple citizenship has been treated as a source of bilateral tensions, a threat to national identity, or a disruption to state sovereignty (League of Nations, 1930; Pogonyi, 2011; Renshon, 2001). This article makes the case that it would behove International Relations (IR) to not limit discussion of multiple citizenship to traditional state-centric view. Investigating the concept and unfolding phenomenon of multiple citizenship more seriously could actually contribute to IR theory and enrich the discipline in at least two possible ways. Firstly, multiple citizenship challenges us to re-think some of the most fundamental concepts in traditional IR and politics – the territorial sovereign state, the nation-state, and social contract theory. Secondly, multiple citizenship provides an opportunity to contemplate the relationship between globalization and nation-states.

To elucidate possible areas for analyses of multiple citizenship beyond the confines of traditional IR, this article employs a multidisciplinary literature review. The systematic review combines two methods for collecting relevant literature: a database search was first conducted to come up with an initial set of papers, which was subsequently used as the basis for snowballing, where “the reference list of a paper or the citations to the paper” are used “to identify additional papers” (Wohlin, 2014, p. 1). Disciplines covered include political science, migration studies, anthropology, law, citizenship studies, and ethnic studies. Approximately 50 relevant items were grouped into themes relevant for this objective.

The organization of this paper is as follows: The article begins with identifying several well-established concepts within traditional IR, addressing how contemplating on multiple citizenship can help deconstruct and globalise them. Specifically, discussions will be devoted to problematizing the territorial logic of sovereign states, the conflation of ‘nation’ and ‘state’ in the nation-state, and the perceived relationship between citizen and state. Next, this article draws upon multiple citizenship to locate and discuss areas which may concern larger portions of the population in the future or which merit further consideration concerning the future of the nation-state. This article then concludes by arguing for more ambitious probing into the concept of multiple citizenship in IR.

ANALYTICAL FRAMEWORK

Before delving into the main body of discussion outlined above, however, a brief overview of the concept of multiple citizenship itself would not be remiss. The International Organisation for Migration (2011) defines multiple citizenship as “simultaneous possession of the nationality of two or more countries by the same person” (p. 30). There are three main ways to obtain multiple citizenship: being born to parents from different countries; being born in a country which practices *jus soli* to parents from *jus sanguinis* countries; and being naturalised when neither the receiving state nor the origin state requires renunciation of citizenship (Spiro, 2010, p. 118). Because ‘dual citizenship’ is a subset of ‘multiple citizenship,’ this article discusses multiple citizenship in general unless the particular case under consideration pertains to dual citizenship specifically.

Although there is still a dearth of comprehensive data on multiple citizenship around the world, existing data suggests that empirical cases and acknowledgement via national policy of multiple citizenship have been increasing. Research based on Canadian census data shows rapid growth in multiple citizenship: cases among naturalised immigrants jumped from 5.5% in 1981 to 16.6% in 1996 (Bloemraad, 2004, p. 405). The number of countries with legislation allowing multiple citizenship has also increased about ten-fold from 1959 to 2005 (Sejersen, 2008, p. 531). In fact, Sejersen (2008) posits that multiple citizenship legislation may be following a trajectory similar to the expansion of citizenship, from Europe to Asia and the Middle East. There are diverse sources behind growing tolerance for multiple citizenship, some state-oriented and some not. They include supply-side incentives by receiving states aiming to attract migrant workers for economic development; engagement of diaspora by origin states; shifts in taxation and conscription legislation which ease some of the legal complexities of multiple citizenship; bilateral treaties and international agreements on taxation and military service; the development of human rights and gender equality; decreased threats of international conflict; and stronger recognition of cultural identities (Leblang, 2017; Pogonyi, 2011; Sejersen, 2008). Contrary to some popular perceptions of multiple citizenship as bastions of class privilege, no apparent link has been found between individuals’ economic status and possession of multiple citizenship (Bloemraad, 2004, p. 414). On the other hand, the same study (Bloemraad, 2004, pp. 416–419) shows that those with higher education levels and those more internationally mobile tend to be more likely to have multiple citizenship.

DISCUSSION

Deterritorialising Traditional International Relations

Multiple citizenship urges us to re-examine several fundamental concepts of traditional IR, i.e., nations, states, sovereignty, territory, and citizens, especially with regard to disaggregating the perceived relationship between them. As their consolidation took place in an era long before the advent of contemporary globalisation, it is critical that we bring their continued relevance and applicability into question. In particular, the concept and phenomenon of multiple citizenship presents an opportunity to deterritorialise traditional IR, disaggregate the nation-state, and revisit social contract theory. This article discusses each of these issues, beginning with deterritorialisation.

Multiple citizenship brings under scrutiny what has been referred to as ‘methodological nationalism’ (Wimmer & Glick Schiller, 2003) in social sciences and as the ‘territorial trap’ (Agnew, 1994) in IR, particularly in regard to Realism and Liberalism. Social sciences has “systematically taken for granted nationally bounded societies as the natural unit of analysis” (Wimmer & Glick Schiller, 2003, p. 579), assuming that social and political processes can be neatly compartmentalised along nation-states’ territorial boundaries. This binary container space approach to the nation-state, where “people are either completely part of this space or completely outside it” (Weiss, 2005, p. 711), enables the territorial nation-state to be understood as an obvious unit of analysis. Weiss (2005) notes that methodological nationalism is deeply entrenched in various fields of social sciences, ranging from studies on national economics and histories to class positions and demographic groups within each country’s borders. This tendency is perpetuated by the institutions and organisations with which academics are affiliated or rely upon for funding, which demand that academics concentrate on solving ‘national problems.’

Methodological nationalism is especially germane in traditional IR, a field defined by focus on understanding interactions between states delineated by territorial boundaries. Despite the nation-state being the central actor within traditional schools of IR, not much effort has been devoted to evaluating whether nation-states truly are mutually exclusive and unique actors. Nor are the characteristics that demarcate each state itself subject to much discussion. Instead the nation-state is seen as an ahistorical unit, readily utilised as a unit of analysis. Furthermore, traditional IR frequently understands ‘nation-state’ as ‘territorial state’ (Agnew, 1994, p. 59). Agnew (1994) suggests three reasons for this territorial approach to the nation-state: state territories

being “reified as set or fixed units of sovereign space”; dichotomies delineating domestic-foreign and national-international interactions obscuring “the interaction between processes operating at different scales”; and the territorial state being “viewed as existing prior to and as a container of society” (p. 59). These three factors combine to form what Agnew (1994) refers to as the ‘territorial trap’ within traditional IR.

Territorial state logic is especially pertinent for matters of security in the current political system of social contracts between states and rational subjects. Once divine and hierarchical relations had lost their clout over politics, sovereign power was allotted to “tightly defined spatial unit[s]” (Agnew, 1994, pp. 60–62) in order to guarantee security. Agnew (1994) notes that this binding of security to territorially defined sovereign states has several consequences for traditional IR. First, political identities came to be understood in state-territorial terms. Second, anyone outside of the territorial space became identified as the out-group (see Druckman, 1994). Third, the territorial state is seen as an abstract, ahistorical, ideal form, obscuring the individual trajectories by which each modern state was created. Fourth, the perceived primacy of territorial sovereign states constrains discussion on alternative political organisations (Agnew, 1994).

Despite the utility and expediency traditional IR gained by engaging the territorial state as a primary unit of analysis, it also inhibits attempts to understand transborder interactions and peoples who do not exist according to dichotomous container spaces. The consequences mentioned above, especially the first and second, are already being challenged by shifts of transnationalism such as the proliferation of political identities and transborder linkages of political actors. In particular, the significance of territories for identity formation is waning (Jacobson, 2001). Transnationalism has engendered various alternative sources for political identities including gender, ethnicity, race, religion, sexual orientation, social class, and culture. Multiple citizenship presents yet another reason for the territorial logic-based aspects of traditional IR to be refined.

The binary logic of territorial sovereign states is ill equipped to deal with someone who is simultaneously Canadian, French, and Jordanian. Membership to a territorial state is likely not enough to ascertain such a person’s political identity. Multiple citizenship further complicates the usage of territorial boundaries as signifiers of the out-group. Those in possession of multiple passports are simultaneously a member of both the in-group and out-group, regardless of their physical location.

Moreover, multiple citizenship can factor into transborder nation-building projects when combined with diaspora governance policies of sending states (Pogonyi, 2011; Renshon, 2001). For instance, Gamlen, Cummings, and Vaaler (2017) find that sending states have increasingly been establishing diaspora (emigrants and their descendants, in this case) institutions with the aim of exploiting diasporas' economic or political resources, expanding political communities across territorial borders, or participating in international initiatives to govern global migration. Among these motivations, the first, particularly in relation to persuading diaspora to lobby receiving states' governments to further the sending state's national interests, could be facilitated if the diaspora in question happened to also possess the receiving state's citizenship. Some sending states such as Mexico and Bulgaria espouse political lobbying by their diaspora (Gamlen et al., 2017, pp. 5–6); considering such efforts from a receiving state perspective, Renshon (2001) expresses apprehension about what allowing multiple citizenship for immigrants could mean for national identity.

Multiple citizenship also challenges the fundamental rationale that links territorial sovereign states to security. Sovereignty gave states absolute authority over their territory and the peoples within it, providing them with the mandate by which to seek national security. Sovereignty was exclusive to each state's own realm, preventing them from interfering in territories and subjects of other sovereigns. Multiple citizenship complicates the application of this 'absolute power within, non-interference without' principle of sovereignty. Spiro (2010) notes that although it is difficult to find concrete cases of dual citizens posing direct security threats such as espionage, states still perceive dual citizenship as a problem that needs to be contained as it obfuscates sovereign rights and the boundaries between states, thus potentially destabilising international relations. Before the diffusion of human rights norms, sovereign states were unchallenged in how they treated their own citizens. The corollaries were that they did not have such freedom over citizens of other sovereign states, and that they should not interfere with how other states treat their own citizens. Cases of multiple citizenship disrupted these delimitations, broaching the threat of bilateral conflict; they also complicated military conscription (Spiro, 2010). A case in point is the War of 1812, partially caused by Great Britain's refusal to recognize British emigrants' rights to naturalise to the U.S. Instead Great Britain forcibly conscripted them, stating norms of perpetual allegiance (Pogonyi, 2011, p. 688).

The pre-World War II era, marked by lack of (modern) institutions to deter war, saw states utilise bilateral and international solutions to curb complications arising from multiple citizenship. For example, the United States negotiated 26 ‘Bancroft treaties’ from 1868 to 1937 concerning naturalisation and citizenship transference (Walter, 1978). Likewise, the League of Nations held the Convention on Certain Questions Relating to the Conflict of Nationality Law, stating that “it is in the general interest of the international community to secure that all its members should recognise that every person should have a nationality and should have one nationality only” (League of Nations, 1930). The Council of Europe exhibited a similar stance towards multiple citizenship during its Convention on the Reduction of Cases of Multiple Nationality and on Military Obligations in Cases of Multiple Nationality in 1963. When international agreements proved insufficient in eradicating cases of multiple citizenship, social norms became an alternative solution. The relationship between citizen and state was framed in a familial context, accusing dual nationals of bigamy and disloyalty (Spiro, 2010, pp. 114–115).

Increasing transborder linkages and international mobility underline the pertinence of reconsidering the relationship between territorial sovereign states and multiple citizenship. As evidenced by Bloemraad (2004) and Sejersen (2008), multiple citizenship is increasing throughout the world. Manifest globalising forces are not the only cause for this trend. Changes in national legislation and institution of bilateral agreements regarding military service, the influence of gender equality allowing citizenship to be inherited from mothers as well as fathers, and decreases in international conflicts have served as additional sources for occurrence and recognition of multiple citizenship (Spiro, 1997). International mobility and globalising identities also undermine the strength of social norms hostile to multiple citizenship holders. Census data (Bloemraad, 2004) and compilations of national citizenship policies (Sejersen, 2008) both evidence that multiple citizenship is becoming less of a rarity. Consequently, this phenomenon challenges traditional IR theory to re-examine its explanation for the link between sovereign states, territories, and citizens.

Deconstructing the Constructivist Approach to the Nation-state

Another way in which examining multiple citizenship can contribute to IR theory is through its assistance in efforts to deconstruct the nation-state. Adamson and Demetriou (2007) note that although the collective political identity of the nation and

the sovereign administrative unit of the state do not necessarily coincide with each other, the two are often conflated and referred to as a single entity, the ‘nation-state.’ Thus combined, states are distinguished from one another by comparing their national cultural characteristics (Adamson & Demetriou, 2007). While employing a state’s ‘national identity’ as a unit of analysis to understand international relations has considerable merits (Wendt, 2004) the problem is that the “nationalist genie” is “increasingly unrestrained by ideas of spatial boundary and territorial sovereignty” (Appadurai, 1996, pp. 160–161).

Adamson and Demetriou (2007) inquire into the relationship between “the state as an administrative unit and the state as a spatially discrete homogenous political identity” (p. 490) – ‘stateness’ and ‘nationness’ – by incorporating the concept of diaspora into IR theory. By examining diaspora mobilisation, they find that contrary to the assumption of the nation-state as the basic unit of analysis in many schools of IR, territoriality is not an exclusive source for political identities. Whereas the nation-state is a territorialised institutional organisation, the diaspora, living deterritorialised existences, reconstruct the nation through their networks of collective identities (Adamson & Demetriou, 2007). Although the territorial space upon which states are bounded still holds symbolic meaning for national identities, the practices employed by diaspora to construct and mobilise those very identities are transnational, unbound to territories (Adamson & Demetriou, 2007). The proliferation of diaspora institutions is evidence that state governments themselves are participating in stretching national identities over the territorially bound state (Gamlen, 2014). Analysing diaspora and the question of identity thus assist constructivist theory in breaking out from the confines of state-centrism.

Considering that multiple citizenship generally transpires as a result of the international migration of either the relevant individuals or their parents, and that diaspora are broadly defined as immigrants and their descendants who maintain linkages with their origin country (International Organization for Migration, 2011), it can be assumed that multiple citizenship holders are likely members of diaspora. Indeed, the International Organization for Migration does define diaspora as encompassing those with multiple citizenship (p. 28). Thus, multiple citizenship holders also incur the deconstruction of the nation-state by diaspora as described earlier in the case of diaspora. In fact, the concept of multiple citizenship offers further complexities to consider in this expansion of the constructivist research agenda. As mentioned earlier concerning the

deterritorialisation of IR, multiple citizenship complicates the link between nation and state. Multiple citizenship holders are distinct from diaspora members in that the latter's political identities are defined by collective identities maintained and mobilised by imaginations of the homeland and transnational linkages (Adamson & Demetriou, 2007; Safran, 1991; Sökefeld, 2006), whereas multiple citizenship holders are legally, officially recognised as members of all the states in question. Despite legal membership to a state not necessarily guaranteeing national identity (Brubaker, 1992; McCrone & Kiely, 2000), citizenship is often perceived to denote national allegiance, as the German-Turkish tensions over naturalisation and dual citizenship illustrate.

How multiple citizenship holders actually decide their political, national identities has yet to be fully explained. But theoretically, their national identities can exist anywhere on a gradient of one country, the other country (for dual nationals), all countries, or somewhere in between. Multiple citizenship calls into question the conflation of the nation and state into a single unit because unlike with traditional state subjects, the 'one citizenship per person' rule simply does not work for their holders. While some deride this aspect as resulting from "promiscuous" policies which engender "non-monogamous" (Pogonyi, 2011, p. 687) citizenship statuses, the reality remains that multiple citizenship is on the rise. A re-conceptualisation of the link between nation and state is thus required to explain this phenomenon.

Revisiting Social Contract Theory

Wider acknowledgement of multiple citizenship has consequences for the relationship between citizens and the sovereign state. Citizenship has two facets: one is where, how, and how much society should seek to maintain equality between individuals, and the other is the demarcation between citizens and non-citizens (Sejersen, 2008, p. 524). The Westphalian mode of citizenship handled these facets with a system of perpetual allegiance from each individual to one nation-state, where obligations and rights were exchanged by social contract. These questions are more complex to answer now that citizens' social interactions are not necessarily confined within territorial state boundaries (Levitt & Glick Schiller, 2004) and binary logic cannot so easily determine whether someone is a citizen. The advent of transnationalism has fuelled new debates about both aspects of citizenship (Faist, 2000; Faist, Gerdes, & Rieple, 2004; Schlenker & Blatter, 2014; Weiss, 2005). Multiple citizenship adds to debates concerning political rights, democracy, and welfare as it revisits elemental questions on who the citizens are,

what their relationship with the state should be like, and to whom states are responsible for in what ways.

There are contrasting views regarding the potential influence of multiple citizenship holders as political actors. On the one hand, Hammar (1985) argues that allowing multiple citizenship for immigrants will help resolve the dilemma of representative government. With globalisation encouraging international (im)migration, more and more people are residing in countries other than their country of citizenship. However, even when immigrants pay taxes and are active members of society, they are often excluded from the formal political system because many states require citizenship for inclusion. In other words, contemporary democratic governments are not necessarily representative of all of their residents. Although one possible solution for enhancing representativeness would be to naturalise immigrants, immigrants may be loath to part with their original citizenships whether for pragmatic or sentimental reasons (Hammar, 1985). Therefore, argues Hammar, offering multiple citizenship is an alternative option for facilitating immigrants' political integration and improving representative democracy in receiving states.

This argument is supported with some empirical evidence. Contrary to expectations that multiple citizenship will bolster immigrants' ties with their homeland to the detriment of their political participation in the receiving state, Escobar (2004) finds that Colombians with U.S. dual citizenship show interest in engaging in the U.S. political system. Additionally, her research shows that dual citizenship legislation by Colombia promoted naturalisation to the U.S. (Escobar, 2004). A concurring study (Jones-Correa, 2001) finds that immigrants respond to the incentive of multiple citizenship legislation when deciding whether to naturalise and vote in the host society. That is, recognising multiple citizenship can encourage immigrants' political integration into the host society.

Subsequent studies find that multiple citizenship legislation can also facilitate emigrants' continued interest and engagement in their country of origin. Schlenker, Blatter, and Birka (2017) found that Swiss emigrants with dual citizenship were no less likely to be active in Swiss politics than their sedentary, single-citizenship countrymen. This possibility is acknowledged by at least 23 states that do not restrict dual citizenship holders from political participation in both countries (Blatter, Erdmann, & Schwanke, 2009, p. 26). In addition, at least 25 states supply further opportunities by not disallowing them from occupying political offices (Blatter et al., 2009, p. 25). With

multiple citizenship not only promoting immigrants' naturalisation and political integration but also assisting in emigrants' continued political engagement with their origin country, it appears that multiple citizenship offers the possibility of simultaneous formal political participation to more than one country. At the theoretical level, Blatter (2011) notes that most theories of democracy, excluding communitarian democracy, are capable of incorporating multiple citizenship. He further contends that the concept of multiple citizenship can contribute to enriching theories of democracy by transnationalising them.

Debate also emerges around the question of multiple citizenship as a right. Spiro (2010) contends that multiple citizenship should not merely be viewed as a legal status, but regarded as a human right. He claims that because multiple citizenship entails associative freedom and self-governance, governments should protect it as a human right. In other words, he advocates for multiple citizenship to be added to the political rights section of the social contract. Pogonyi (2011) strongly opposes this stance—he argues that instating multiple citizenship as a political right could open a door for foreign influence on election or referendum results, hints of which can be seen in Turkish-German, Mexican-American, and Hungarian experiences. He adds that allowing non-resident citizens to vote in elections violates principles of democratic equality. This problem is exacerbated by non-resident citizens not having to bear the costs of political decisions. Diasporas exempt from the need to bear the costs of radical political agendas are occasionally implicated in 'long-distance nationalism' (Demmers, 2002), deterritorialising and perpetuating conflicts. As multiple citizenship holders are likely to be diaspora, as mentioned previously, their political participation may aggravate this problem.

A more narrowed down debate pertaining to rights zooms in on the issue of welfare, which converges particularly around two points. The first concerns whom the welfare state should provide for, while the second is about whether multiple citizenship holders fulfill enough duties as citizens to be entitled to welfare benefits. Sovereignty functions as a mechanism for separating citizens from non-citizens, denying non-citizens the same rights as citizens (Guild, 2006). One right which the state can completely exclude non-citizens from is welfare (Weiss, 2005).

¹ Nevertheless, setting the threshold for entitlement to social benefits at citizenship does not exclude non-resident multiple citizenship holders. This means that those with multiple citizenship can capitalize on welfare benefits without sharing the

burden of public expenses (Pogonyi, 2011, p. 699), e.g., taxes and military service. In short, they can free ride.

Controversy surrounding multiple citizenship in South Korea illuminates fear of this probable free riding, as welfare becomes main incentive for Korean diaspora members to acquire South Korean citizenship (Han, Choi, & Kim, 2017). This is met with fierce domestic opposition, which points to how multiple citizenship necessitates reconsideration of social equality not only within states, but also between citizens residing domestically and outside of territorial borders. Specifically, for the South Korean case, relevant debates comprise questions such as how much tax and/or military service one must contribute to be privy to welfare and whether those cut-offs should differ depending on residence status on paper or actual residence within borders.

Multiple citizenship has also featured in debates concerning multiculturalism and the ‘threats’ posed by immigrants to national identity (Dijkink & Van Der Welle, 2009; Renshon, 2001). Others raise the question of divided allegiances, doubting just how much multiple citizenship holders will be able to contribute to the host society (Renshon, 2001). Multiple citizenship opens up space for transnational political actors by expanding routes for formal political participation. However, the direction of its impact on democracy, national politics, and transnational politics is still ambiguous. Traditional IR theory will need to be updated if it is to provide clearer answers.

Lastly, particularly in regard to counterterrorism discourse, multiple citizenship requires states to decide who they have a responsibility to protect, and to what extent. Macklin (2007) worries that those with multiple citizenship “can more easily be stripped of their nationality by countries which perceive them as threats since they do not end up with having no nationality” (as cited in Blatter et al., 2009, pp. 29–30). Stasiulis and Ross (2006) share this concern, especially in the post-9/11 context. Diplomatic protection is conducted by state A protecting its citizens from state B. But in the global War on Terror states collaborated against individuals suspected of terrorist activity, rejecting diplomatic protection of their own citizens. As can be seen in the inhumane treatment of Arab or Muslim dual citizens, some dual citizens can be subjected to a “vacuum devoid of diplomatic protection” (Stasiulis & Ross, 2006, p. 344), despite being at the opposite end of the continuum from statelessness. In fact, Kannof (2011) delineates a legal strategy wherein the U.S. government may treat dual citizen terrorist suspects as non-citizens. The subsuming of multiple citizenship under counterterrorism discourse thus results in sovereign powers deliberating whether and when they will cede

their responsibility to protect their own citizens. IR will have to anticipate and explain the relevant decision-making processes.

Multiple Citizenship and the Complicated Relationship between Globalisation and Nation-states

There are various problems multiple citizenship holders run into during everyday life that others need not consider yet. For instance, those who are simultaneously citizens of countries that use different languages might have different names for each country (e.g., A Cyrillic name and an Americanised name.) While this may cause issues for identity formation among diaspora in general, impacts are more tangible when the divergence spills over to legal documents. For example, the U.S. Embassy & Consulates in Japan (n.d.) lists questions by dual citizens regarding different names on American and Japanese passports on their website's FAQ section. A forum for US immigrants has a thread ("Dual citizenship with different names?," 2011) about issues relevant to multiple citizenship holders' different names including plane tickets, insurance bills, and personal identities. Banking transactions can be particularly tricky because of how state authority is exercised in the current international system. According to a conversation the author once had with a Citibank employee (personal communication, 2015), Citibank discourages Korean-American dual citizens from opening bank accounts. The rationale is that if they withdraw money from outside Korea, Korean law construes the action as currency fraud by foreigners. Multiple citizenship holders may also experience issues with taxation, national pensions, military service, social benefits, national health care, and working in public offices or areas relevant to national security. While multiple citizenship holders do not constitute a large portion of the global population yet, these examples hint at what may later become more common everyday experiences.

Likewise, multiple citizenship can provide a prism for illuminating areas, which warrant further discussion both in academia and at policy level, particularly in regard to the future of nation-states in a globalising world. Citizenship once operated as "an international filing system, a mechanism for allocating persons to states" (Brubaker, 1992, p. 31), multiple citizenship negates this system and brings into question future government and governance practices. Multiple citizenship also hints at new modes of identity formation that transcend traditional relationships between individuals and nation-states, while simultaneously giving insight into counterforces trying to keep identities defined by the nation-state.

Whereas some predict that globalisation will diminish the authority of nation-states (Strange, 2003), multiple citizenship offers alternate perspectives on the link between globalisation and nation-states. Although nation-states may find it challenging to maintain the forms and magnitudes of authority of their past (Keohane, 2003; Mann, 2003; Strange, 2003), literature on multiple citizenship shows that they may revamp themselves and seek new spheres and routes through which to exercise authority. Paramount is the negotiation necessitated by joint sovereign authorities over multiple citizenship holders, to make arrangements for and administer issues such as taxation, military service, and diplomatic protection.

Viewed in the *longue durée*, concerns about “dual military service and double taxation” (Faist et al., 2004, p. 915) have always featured prominently. An exemplary case is Great Britain’s refusal to relinquish sovereign rights over naturalised emigrants, which contributed to the War of 1812 (Pogonyi, 2011, p. 688). Similarly, the League of Nation’s 1930 Convention on Certain Questions Relating to the Conflict of Nationality Law and the Council of Europe’s 1963 Convention on the Reduction of Cases of Multiple Nationality and on Military Obligations in Cases of Multiple Nationality were both attempts to curb the ‘problem’ of multiple citizenship in relation to military service (Legomsky, 2001). Various bilateral agreements have also been signed to navigate governance of multiple citizenship and military obligations: Legomsky (2001) includes 22 examples of such bilateral treaties. In more recent times, Legomsky notes that international treaties such as the 1997 European Convention on Nationality have come to exhibit much more tolerant attitudes towards multiple citizenship. With multiple citizenship now being on the rise as Bloemraad (2004) and Sejersen (2008) suggest, negotiations between sovereign authorities over multiple citizenship may become more pertinent in the future – and not only in regard to military service.

The case of multiple citizenship also elucidates how in the flux of globalisation, the move towards policy alignment appears a prudent option for nation-states. In the context of migration, Alarian and Goodman (2017) show that dual citizenship policies in sending and receiving states interact to form incentive structures for migrants. Migrants respond rationally to recognition of dual citizenship in either the sending state or the receiving state. Consequently, shifts in national policies in one country of the migration pair influences overall migration flows between the two countries. Therefore, efforts to influence migration flows would be more effective if states forming migration pairs were to coordinate their policies (Alarian & Goodman, 2017). A similar case of

policy aligning is evident in the growth of naturalisation rates after sending states begin recognising multiple citizenship (Escobar, 2004; Mazzolari, 2005). Additionally, Fitzgerald (2000) and Levitt (2002) find that U.S. welfare reform to restrict social benefit recipients to citizens was a significant factor in Brazil's and Mexico's decision to allow multiple citizenship in the first place (as cited in Escobar, 2004, p. 50). These examples showcase it seems that factors influencing policy decision-making and effectiveness are no longer limited to within territorial boundaries. Transborder policy interactions provide an incentive for states to coordinate policies on issues such as immigration for optimal results.

The expansion of multiple citizenship also evidences how national legislation can be impacted by shifts in global discourses. A case in point is how social transformations towards gender equality has boosted the occurrence of multiple citizenship (Spiro, 1997). Feminist discourse could alter citizenship laws so that women wed to foreign citizens would not automatically lose their original citizenship. Examples include the Netherlands in the 1960s (Faist et al., 2004, p. 931) and South Korea during the late 1990s (Kim, 2013, p. 10). Gender equality is also expanding the right to pass citizenship on to children from fathers-only to both fathers and mothers (Faist et al., 2004; Kim, 2013; Sejersen, 2008). Both developments have the effect of raising the number of those eligible for multiple citizenship. Other social issues at the global level which have influenced tolerance for multiple citizenship include refugees and asylum seekers, the evolution of the human rights regime, and human rights' impact on notions of the relationship between citizens and nation-states (Faist et al., 2004; Hammar, 1985; Stasiulis & Ross, 2006). Not only the more salient phenomenon of globalisation such as increasing international migration, but also seemingly unrelated discourses such as gender equality and human rights influence national citizenship policies. The effect that globalisation has on national borders is not limited to the physical – ideational borders are also rendered more porous.

Next, multiple citizenship provides nation-states with a recourse opportunity to advance their own domestic agendas, even if they have to redefine their boundaries in the process. From a broader context, these efforts can be understood in relation to diaspora institutions. Policy decisions to establish diaspora institutions were underpinned by recognition of diaspora as assets to harness, whether as resources to be “tapped,” transborder identities to be “embraced,” or evidence of conformance to global norms (Gamlen, 2014; Gamlen et al., 2017). Similarly, governments can leverage

multiple citizenship to their advantage. Despite multiple citizenship challenging traditional concepts of citizenship and sovereignty, the final authority to decide whether to include or exclude someone as a citizen still lies with states. This authority can be utilised by nation-states to further their agendas concerning immigrants, emigrants, or nation-building.

A survey of national experts (Blatter et al., 2009) found integration of immigrants, enhancement of bonds with emigrants/diaspora, and advancement of the nation-building project to have been primary goals in recent citizenship legislation around the world. Although the immigrant-oriented motive mentioned in Blatter et al. (2009) concerns immigrant integration into the host society, the South Korean case provides an example of multiple citizenship being promoted as a means of attracting global talent (Kim, 2013). From an emigrant-oriented perspective, sending states allow multiple citizenship in order to capitalize upon diaspora remittances and facilitate return migration (Leblang, 2017). South Korea began allowing de facto multiple citizenship after the 1997 Asian Financial Crisis in an effort to attract diaspora investment (Kim, 2013). As for the import of the nation-building project, states are incorporating multiple citizenship into their transborder nation-building processes. These processes are blatant enough to cause apprehension in receiving states (Renshon, 2001). Blatter et al. (2009) find “strengthening national identity and cohesion” still the most significant motive in citizenship legislation, with unsuccessful reform proposals much less likely to have been “connected to the goal of strengthening national identity or cohesion” (pp. 17–18).

Yet, the nation-state is far from being the only actor exploiting citizenship as a means to an end – citizens themselves do so as well. Citizenship is no longer a promise of perpetual allegiance to a single nation-state. Nor is it an indicator of exclusive political obligations and rights. Instead, some transnational actors see citizenship as a resource to be leveraged for material gains. Ong (1999) introduces the concept of ‘flexible citizenship’ to illustrate how members of the Chinese diaspora situate belonging primarily within the context of economic globalisation by choosing and exploiting citizenships on the basis of profitability. The case of South Korea also exemplifies this shifting status of citizenship as public outcry points to the appropriation multiple citizenship as a device to pass on class privilege (Kim, 2013). These divergent interpretations of citizenship simultaneously show how the absolute authority nation-states once held over citizenship is now being undermined—if not in technicality then in spirit.

To show how current form of Westphalian citizenship is also being challenged by new modes and sources of citizenship, Schlenker and Blatter (2014) devise a conceptual map for different types of democratic citizenship. They categorise citizenship along two axes – origin of citizenship ranging from single national community to multiple communities to a universal community, and direction of citizenship from domestic to transnational to supranational. Through analysis of the resultant nine forms of citizenship based on empirical evidence and normative discourse, they find that mono-national Westphalian citizenship, while still dominant empirically, is experiencing deviations and receiving less enthusiastic responses. Conversely, citizenships founded on universal membership are empirically non-existent but are aspired towards normatively. Forms of citizenship based in multiple communities – i.e., partial citizenships, multiple citizenships, and multilevel citizenships – are experiencing growth in both normative acceptance and empirical evidence (Schlenker & Blatter, 2014). An earlier empirical study by Bloemraad (2004) suggested corresponding results, finding that Canadian census data reinforces traditional models of citizenship and supports certain aspects of transnational models, while lacking evidence for postnational models. Even if the Westphalian nation-state model of citizenship still holds a primary position, its alternatives are not without backing, whether normative or empirical.

Adverse reactions to multiple citizenship likewise merit consideration when discussing the future of the nation-state because they exemplify why the territorial nation-state is still a key source of identity formation. In Newman's (2001) words, "while boundaries have been penetrated, borders retain their essential characteristic as constructs that define the nature of exclusion and inclusion" (p. 151). Rationales behind refusal to accept multiple citizenship offer insight into what those with traditional views about the nation-state believe their country should be like and whom they can accept as fellow citizens. For instance, in Germany, where citizenship laws are firmly influenced by the *jus sanguinis* principle (Sejersen, 2008), populist political parties leverage hostility against foreigners to oppose reform of citizenship law (Cooper, 2002). Denmark prefers its citizens to have an exclusive relationship with Denmark and would rather that "only people who are fully committed to being Danish" (Sejersen, 2008, p. 542) participate in Danish politics. These examples show how beliefs that national identities should be homogenous and political participation monogamous persist in the midst of globalisation, indicating present unwillingness in some societies to let 'visible' (see Guild, 2006; Leinonen, 2012) outsiders cross the threshold of citizenship.

If the German and Danish cases provide examples of societies trying to maintain a traditional model of the nation-state, counterterrorism efforts hint at attempts to force identities back into territorial nation-state containers. In cases where terrorist suspects hold multiple citizenship, human rights regimes and the state duty of diplomatic protection can make their prosecution a delicate issue (Stasiulis & Ross, 2006). When such complication arises, states may attempt circumvention by temporarily rendering the problematic citizenship void (Kannof, 2011). The War on Terror provides cases of governments opting to not recognise all of a dual national's citizenships in their efforts to pursue national security (Kannof, 2011; Stasiulis & Ross, 2006). Although these are extreme examples, they offer insight to states' adaptability in their exercise of power in responding to changes engendered by globalisation.

CONCLUSION

Founded in an era when relationships between territorial boundaries, states, and citizens were more straightforward, the discipline of IR is in the process of remaking itself to better address the challenges of a globalising world. This article has proposed multiple citizenship as an analytical resource towards this endeavour. Investigating multiple citizenship can make two important contributions to IR theory. Firstly, by questioning well-established concepts that have largely been taken for granted. It challenges the territorial state logic preponderant in traditional IR and problematises its inherent methodological nationalism. The case of multiple citizenship holders and their national identities also provide an opportunity to deconstruct the nation-state, which is often treated as an unproblematic unit of analysis in traditional IR. Focus on multiple citizenship can further allow us to review the evolving relationship between citizens and states. Secondly, multiple citizenship presents a unique vantage point from which we can consider the changes and complexities that arise from a globalising world. Multiple citizenship offers insight into various facets of the future of nation-states and identity formation, assisting IR in theorising the consequences of globalisation.

Drawing on survey of multidisciplinary literature, this article ends with a solicitous note that the vast majority of literature on multiple citizenship still do not come from IR. There is a considerable knowledge gap that IR needs to address. As a discipline, IR has a long history of building upon ideas originating from others. Multiple citizenship presents yet another issue where IR can gain from exploring what and how

other fields are studying. Incorporating multidisciplinary insights encourages enrichment of IR in ways endogenous efforts would prove difficult.

To suggest one way forward for IR investigation of multiple citizenship in IR, there is ample room for exploration on the topic of multiple citizenship holders as political actors. Existing literature on multiple citizenship holders as political actors tends to focus on either the ‘origin’ state or the ‘receiving’ state, treating them as either immigrants or emigrants. However, this dichotomous analytical treatment begs the question of whether such binary logic can truly encompass all cases of multiple citizenship. Must everyone in possession of multiple citizenship be delimited to an origin society and a host society? What of those with three or more citizenships? Are there no truly transnational, ‘multiple’ political identities? There is much possibility for imagining multiple citizenship holders and theorising them as simultaneous political actors in all relevant states.

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¹ Not all countries exempt non-citizens from welfare schemes. Canada, for instance, provides permanent residents with most benefits that citizens enjoy, including healthcare (Government of Canada, 2017).