Original Article

Citizenship configurations: Analysing the multiple purposes of citizenship regimes in Europe

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Abstract This article presents an analysis of the multiple purposes of citizenship regimes in 36 states in Europe. Previous studies on this topic suffer from two methodological deficits that lead to an incomplete perspective on how states regulate citizenship status: they emphasise the importance of static national membership models and focus nearly exclusively on the access to citizenship for immigrants. To overcome these deficits, we develop a citizenship regime typology based on functional components of citizenship laws, focusing on acquisition as well as loss, inside as well as outside the territory of a state. We find that citizenship regimes in Europe configure along two dimensions that can be associated with territorial and ethnocultural inclusion, which result in four types: territorially and ethnoculturally selective regimes that are inclusive on only one of these dimensions, expansive regimes that are inclusive on both dimensions and insular regimes that restrict both inclusions.
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Introduction

In this article, we argue that national citizenship regimes can be compared by analysing the legal provisions that regulate the acquisition and loss of citizenship status. Instead of assuming that citizenship laws regulate only the inclusion of immigrants, we assume that such laws are shaped by multiple purposes and instead of assuming that these purposes can be deduced from underlying principles of civic or ethnic inclusion, we want to find out which regimes can be distinguished empirically based on a comprehensive analysis of the purposes and legal provisions of European citizenship laws.

The steps in our analysis are therefore, first, a discussion of the main purposes of citizenship laws; second, coding legal provisions that serve specific purposes as indicators; and third, a statistical analysis of the dimensionality of these indicators and of the configurations of countries in a space created by the dimensions that we have found.

Citizenship is an important organising principle of political life. It is a status that creates a legal bond between individuals and a state and endows these individuals with certain rights and obligations. States, according to the 1933 Montevideo Convention on the Rights and Duties of States, require not only a defined territory, a government and the capacity to enter into relations with other states, but also a permanent population. Without individual members, so to say, a state cannot exist and citizenship is the institution through which every state 'constitutes and perpetually reconstitutes itself' (Brubaker, 1992, p. xi). To signify the importance of citizenship, or nationality as it is often called in legal terminology, states bestow rights upon a privileged category of persons, most important among which is the unconditional right to admission and residence in the state territory. Other common prerogatives include the exclusive access to public offices and the right to participate in democratic elections, or the possibility to benefit from certain welfare state provisions. This privileged status of citizens signifies their importance as the constituent population of a state. Citizenship is thus both a membership status, as well as a bundle of rights and duties (Bauböck, 1994, p. 23; Faist and Kivisto, 2007a, pp. 1–2). A third dimension of citizenship refers to practices of active participation in political life and civic virtues, that is, those dispositions that support civic involvement and the common good (Bauböck, 2001).

Since the French Revolution, the idea that legitimate states are 'constituted' by their citizens has become a universal norm not in the strong sense of popular sovereignty or democracy, but in the weak sense that all states distinguish citizens from persons temporarily subject to their territorial jurisdiction. Citizenship is also considered as a life-long status acquired at birth and passed on to subsequent generations. The most basic purpose of citizenship laws is therefore to maintain the intergenerational continuity of the state by including principles that define a citizenry as continuous across generations. Such continuity would be jeopardized if every temporary resident would automatically become a citizen or if at the age of majority all individuals could freely choose a citizenship or renounce the one attributed to them at birth. Citizenship is therefore for most individuals a non-voluntary legal status that associates them with a state because of their circumstances of birth in a territory or to citizen parents. In contexts of international migration, attribution of citizenship at birth alone, however, cannot fully meet the need of modern states to determine their membership. States need then complementary rules for naturalisation and for loss of citizenship.

This article compares citizenship laws in 36 European states and asks how states regulate the acquisition and loss of citizenship. While there is a rich literature on this topic, previous studies suffer from three methodological deficits: they emphasise the importance of national membership models and they focus almost exclusively on

access to citizenship for immigrants. This leads to a static and incomplete perspective on how states regulate citizenship status. In this article, we present a configurational approach that aims to overcome these deficits by developing a citizenship regime typology based on functional components of citizenship laws, rather than on static membership models. We thus provide a comprehensive account of citizenship regimes by focusing on the acquisition and loss of citizenship both by residents and by persons residing outside the territory of a state. Third, most previous comparisons have either studied a small set of indicators for citizenship acquisition across a larger set of states or have been based on a comprehensive set of quantitative and qualitative data for a very small set of states. While the former type of comparisons fails to capture the internal complexity of citizenship regimes, the latter type fails to capture the cross-sectional variety of such regimes. As far as we know, our study is based on the largest set of quantitative indicators for the largest set of countries, which makes it possible to overcome both limitations at the same time.

The article is structured as follows. In the next section of the article, we critically discuss alternative citizenship typologies and present our configurational approach to analysing how states regulate the acquisition and loss of citizenship. Subsequently, we introduce our data set on the citizenship laws of 36 European states and discuss issues of operationalisation, coding and method of analysis. In the following section, we present key findings from our analysis. We end the article with a concluding discussion of how our argument and findings relate to the state of the art and where we should go from here in terms of analysing citizenship regimes more generally.

Citizenship Regime Typologies

How does one become a citizen of a certain state? Whereas territory, an equally vital constituent element of statehood, has been divided between states as a result of warfare, international treaties and arbitration in such a way that all permanently inhabited territories are ruled by one state and one state only, the international convention is that states are sovereign in determining their own population, which entails that they can, within certain limits set by international law, exclude populations inside their territory or include others beyond their borders. The result has been a variety of ways in which states attribute and withdraw the status of formal membership, although – particularly in a European context – several observers claim to have detected a process of convergence (for example, Hansen and Weil, 2001; Joppke, 2007, but see Joppke, 2003; Howard, 2005; De Hart and van Oers, 2006; Jacobs and Rea, 2007).

International migration is the main cause for the complexity of citizenship regulations, next to the instability of international borders. In a strictly immobile world, where territory and population match exactly and borders are stable, attributing citizenship at birth via descent or via birthplace does not make any difference and no naturalisation

procedure is needed: all people born in a territory will automatically be born to parents belonging to that territory and remain citizens of their country of residence throughout their lives (Weil, 2001, pp. 19–21). Where human migration causes a disconnection between territory and a constituted population, however, states are faced with questions such as whether to grant citizenship status to children born to resident non-citizens or to children born to citizens residing abroad, whether to allow immigrants to obtain the citizenship of their new country of residence or whether emigrated citizens should be able to keep their citizenship status and the attached rights, even when they obtain the citizenship of a new state of residence.

The different ways in which states attribute citizenship, by descent (*jus sanguinis*), via birthplace (*jus soli*) or through naturalisation (on the basis of residence or special ties), and the relative inclusiveness of these membership rules, are often seen as reflecting contrasting public philosophies about how states and their citizens should relate to each other (Brubaker, 1992; Favell, 2001). According to Brubaker's early work, 'state-centred' nations such as France prioritise the political integration of all people resident within a territory and thus attribute citizenship mainly via birthplace. The rules for the attribution of citizenship to immigrants via naturalisation may also be relatively generous in such countries in order to achieve the inclusion of a high percentage of the resident population as formal members of the polity. 'Ethnocultural' nations, such as pre-reunification Germany, prioritise the integration of a people across borders and thus attribute citizenship mainly via bloodline. Naturalisation is generally very difficult in such countries for those who are not seen to belong to the ethnic nation, which means that large communities of long-term residents may not have access to citizenship.

Critiques pointed at convergence that had not been expected by Brubaker (1992, p. 180) between these models through a series of reforms not only in Germany, but in Europe at large, and concluded that 'the staying power of these [Brubaker's] national models looks more and more dubious' (Weil, 2001; Freeman, 2004, p. 948). Brubaker himself has joined authors who questioned the theoretical consistency of the dichotomy between civic and ethnocultural national citizenship models (Yack, 1996; Brubaker, 1998).

More recently, we observe a rapidly growing body of comparative research on citizenship laws and policies in European and North American states (Nascimbene, 1996; Schuck, 1998; Aleinikoff and Klusmeyer, 2000, 2001; Hansen, 2000; Favell, 2001; Hansen and Weil, 2001; Kondo, 2001; Weil, 2001; Joppke, 2005; Bauböck *et al*, 2006a, b, 2007; Bloemraad, 2006; Faist, 2007). Various indices have been constructed for measuring citizenship regimes on a single scale, the poles of which can be labelled civic versus ethnic, liberal versus restrictive and inclusionary versus exclusionary. The earliest attempt was by Waldrauch and Hofinger (1997). Their Legal Obstacles to Integration index included access to citizenship as one among several policy areas of immigrant integration. The most widely used current index of this kind is the Migrant Integration Policy Index (MIPEX) (British Council and

Migration Policy Group, 2011), which covers a broader range of laws and much broader set of countries. MIPEX attributes scores by measuring legal rules against 'the highest European or international standards aimed at achieving equal rights, responsibilities and opportunities for all residents' (cf. Dronkers and Vink, 2012 for an analysis of the relation between citizenship policies and naturalisation rates among immigrants in Europe, using MIPEX). Howard (2009) has constructed his own Citizenship Policy Index, which uses selective indicators for liberal or restrictive access to citizenship and corrects the evaluation of legal provisions by taking into account also statistical naturalisation rates (in order to avoid a misinterpretation of apparently liberal provisions that are undermined by administrative discretion in the implementation of citizenship laws). Janoski (2010) constructs a Barriers to Naturalisation Index (BNI) that corrects naturalisation rates for the effects of *jus soli* provisions that automatically include second or third generations. Like previous indices, the BNI is meant to capture the restrictiveness of national citizenship regimes for groups of immigrant background. Finally, Koopmans *et al*'s (2012) (cf. Koopmans *et al*, 2005) Indicators of Citizenship Rights for Immigrants include five indicators for acquisition of nationality, which are assigned to either an individual equality or a cultural difference dimension. Although this two-dimensional space of citizenship is an improvement over one-dimensional scales for measuring and comparing citizenship laws, its immigrant focus is still highly selective with regard to the features and target populations of citizenship laws that are taken into account.

One important aspect that is missing in all current typologies is the regulation of loss of citizenship. Conditions for voluntary renunciation and involuntary withdrawal of citizenship regulate the extraterritorial inclusiveness of citizenship in source countries of migration and kin states with co-ethnic minorities abroad. In Europe, they have become politically salient and contested for several reasons: external nationals' admission rights to all other member states; the impact of external citizens' votes on national elections; potential conflicts between kin and host states of national minorities; and the impact of withdrawal of citizenship on free movement rights guaranteed by EU citizenship.

Our critical view of the current state of comparative research on citizenship regimes leads us to conclude that we need a more comprehensive typology that focuses not only on *jus soli*, but also on *jus sanguinis*, not only on ordinary, but also on special naturalisation rules and not only on acquisition, but also on loss of citizenship.

A Configurational Approach

As an alternative approach to both static national typologies and to monodimensional indicator-based assessments of citizenship laws, we distinguish purposes, functional components and dimensions of citizenship regimes and analyse these in three consecutive steps. What we call 'citizenship configurations' refers, on the one hand,

to the bundles of functional components that characterise a specific purpose or feature of citizenship laws and, on the other hand, to clusters of countries whose citizenship laws are functionally similar as indicated by clustering in a two-dimensional grid. Table 1 summarises these three steps of our conceptual framework.

First, we distinguish five *purposes* that citizenship laws serve. All states need to determine who their citizens are. Beyond that general purpose, the concrete provisions of citizenship laws fulfil more specific purposes that vary across states and time. These purposes mainly relate to the basic idea behind citizenship, which is a status of membership of a political community or, in legal terms, a relation between an individual and a state. We do not interpret purposes normatively in the sense of democratic norms (such as the inclusion of all subjected to state coercion) or principles of international law (such as the principle of avoiding statelessness). Instead, we regard them as public policy goals that motivate legislative action in the determination of citizenship. The five purposes all refer to ways in which states use citizenship laws to define the relation with their constituent 'citizen' population. We distinguish, in particular, between purposes of intergenerational continuity, territorial inclusion, singularity, special ties and genuine links.

We do not claim that these purposes are the only ones shaping citizenship legislation. On the one hand, citizenship policies are clearly influenced by the agendas of domestic political actors that propose different interpretations of state interests. For example, while some centrist political parties may want to liberalise naturalisation in order to attract newly enfranchised immigrant voters, others may want to restrict access in order to win back native citizen voters from anti-immigrant parties. On the other hand, international legal norms and pressure exercised by other states or international organisations constrains the scope of national

Table 1: Multiple purposes and functional components of citizenship laws: an analytical framework

Purpose	*Functional component*
Intergenerational continuity	Acquisition of citizenship based on descent (*jus sanguinis*)
	Acquisition of citizenship by birth in territory (*jus soli*)
	Loss of citizenship due to voluntary renunciation
Territorial inclusion	Acquisition of citizenship by ordinary naturalisation: residence conditions
	Acquisition of citizenship by ordinary naturalisation: language conditions
	Acquisition of citizenship by ordinary naturalisation: economic conditions
	Acquisition of citizenship by ordinary naturalisation: cultural assimiliation conditions
Singularity	Acquisition of citizenship by ordinary naturalisation: condition to renounce former citizenship
	Loss of citizenship due to voluntary acquisition of other citizenship
Special ties	Acquisition of citizenship based on special ties: cultural affinity
	Acquisition of citizenship based on special ties: reacquisition by former citizens
Genuine link	Loss of citizenship due to residence abroad

self-determination in matters of citizenship. Such pressures may also become internalised so that compliance with international norms is eventually perceived as an interest of the state concerned. We leave these domestic and external interests aside because we are here not interested in explaining policy outcomes, but in distinguishing general purposes and functions of citizenship laws that are linked to fairly stable conceptions of political community and characteristic national regimes.

We could also add further purposes that have been historically important in many citizenship laws, such as family unity of citizenship status. We confine ourselves in this analysis, however, to those five purposes that states pursue in their unmediated relation to individuals and that together characterise a state's response to the 'irritation' of continuous territorial citizenship through international migration.

Second, we understand the legal provisions regulating acquisition and loss of citizenship status as *functional components* serving these key purposes of citizenship laws. Again, the list of functional components that make up citizenship laws could be continued much beyond our core selection. For example, states that want to attract persons who contribute to their reputation through special achievements in sports, arts or science or who are willing to make large financial investments in the country sometimes facilitate access to citizenship for such target groups (Dzankic, 2012). However, such provisions are somewhat exceptional both in terms of the numbers of states making such offers explicitly in their laws and the numbers of individuals acquiring citizenship in this way. Although our list of 12 components is therefore not fully exhaustive, we believe that it captures the core purposes that states pursue in their citizenship legislation.

Third, we do not expect the clustering of countries to be random. There are good reasons for thinking that some of these functional components are meaningfully related to each other and that the citizenship regimes in similar types of states, for example, with similar types of state-building and migration histories, may share large commonalities. In particular, we expect these citizenship regimes to be differentiated along two main *dimensions*: a territorial dimension and an ethnocultural dimension. These dimensions should be conceived as two different ways of structuring citizenship as the relation between a state and an individual. This can be understood as follows. Whereas from a territorial conception, citizenship is seen as having an integrative dynamic within a bounded territory, from an ethnocultural perspective citizenship is conceived as an integrating instrument within a political community membership in which is determined by descent and cultural belonging.

In other words, rather than traditional approaches that see citizenship laws as being characterised as liberal and inclusive versus illiberal and restrictive, we argue that citizenship laws are configured along different dimensions of inclusiveness. The implicit assumption in most analyses is that the reference population for determining for the degree of inclusiveness are long-term resident immigrants and second or later generations of immigrant descent born in the territory. Restrictive citizenship laws are then those that create obstacles for acquisition by members of this reference

population. A reasonably short residence requirement for naturalisation, the absence of a requirement to renounce a prior citizenship and *jus soli* entitlements are good indicators for such inclusion. Yet, citizenship laws have to determine the degree of inclusiveness not only towards immigrants, but also towards emigrants, for example, with regard to accepting that emigrants retain their citizenship after naturalising abroad and with regard to the automatic transmission of citizenship to second and later generations of emigrant descent. As no democratic state withdraws citizenship automatically as a consequence of emigration, the resident population is not an adequate reference unit for provisions regulating citizenship acquisition, retention or loss among extraterritorial populations. We thus argue that in addition to the resident population, populations of former citizen residents, their descendants, as well as broader ethnoculturally conceived kin populations need to be taken into account when analysing citizenship regimes. While citizenship regimes can, for historical, political or demographic reasons, prioritise one type of inclusiveness over the other, 'expansive' regimes can also display a strong degree of inclusiveness on both dimensions and, by contrast, 'insular' regimes can restrict both types of inclusiveness. Table 2 distinguishes in this way four idealtypic citizenship regimes: those that emphasise either ethnocultural or territorial selection criteria and those that combine restrictions or inclusiveness on both dimensions. The four cells of Table 2 show our hypotheses about the specific purposes of citizenship laws that are characteristic for each of these regimes.

In the remainder of this section, we briefly outline the five basic purposes of citizenship laws from a perspective of state interests and introduce 12 indicators of functional components that we associate with these purposes of citizenship laws.

Table 2: Citizenship configurations: a typology

Ethnocultural inclusion	Territorial inclusion: Weak	Territorial inclusion: Strong
Strong	*Ethnoculturally selective* Intergenerational continuity: strong *ius sanguinis* and difficult renunciation Inclusion through special ties Selective singularity Weak genuine link	*Expansive* Intergenerational continuity: strong *ius sanguinis* and strong *ius soli* Inclusion through residence and special ties Weak singularity Weak genuine link
Weak	*Insular* Intergenerational continuity: weak *ius sanguinis* and weak *ius soli* Restrictive naturalisation Strong singularity Strong genuine link	*Territorially selective* Intergenerational continuity: weak *ius sanguinis* and strong *ius soli* Inclusion through residence Weak singularity Strong genuine link

For each functional component, we outline the relevant reference population for assessing the degree of inclusiveness and explain why we expect it to associate more strongly with a territorial or rather an ethnocultural dimension of citizenship regimes.

Intergenerational continuity

The most basic purpose of all citizenship laws is to secure the intergenerational continuity of the state through birthright attribution of citizenship *jure sanguinis*, *jure soli* or some combination of both principles. Birthright rules thus serve the purpose of including newborn generations in the constituent population of a state, but do so by applying different principles: descent (*jus sanguinis*) and territorial birth (*jus soli*). For the interpretation of birthright, we need to keep in mind that, as discussed before, the common association of *jus sanguinis* with ethnic conceptions of nationhood and of *jus soli* with civic ones is in several ways misleading. It does not reflect the historic origins of both principles and wrongly construes them as polar opposites (Bauböck, 1994, Chapter 2; Weil, 2002). It is only in contexts of international migration that the inclusionary effect of *jus soli* for second generations of foreign descent emerges. Whether *jus sanguinis* has the opposite effect of reproducing an ethnically homogeneous citizenry depends crucially on the naturalisation regime. Where large parts of first generation immigrants of foreign origin are naturalised, second generations will again be citizens by birth even if there is no *jus soli* provision. This is a main reason why we can find today rapidly increasing ethnic heterogeneity among citizens even in some European states with a strong dominance of *jus sanguinis* traditions. A third component that can be linked to this purpose of citizenship, finally, relates not to acquisition but to loss of citizenship. This concerns the possibility for individuals to voluntarily renounce their citizenship. Particularly regimes with a strong ethnocultural notion of citizenship may perceive such individual exit-options with suspicion and indeed we find a large number of states around the world where voluntary renunciation is either not possible at all or only allowed for permanently emigrated citizens.

Territorial inclusion

Whereas all states have a fundamental interest in securing the intergenerational continuity of their citizenry, state interests differ considerably with regard to the territorial inclusion of residents as citizens. Political theorists have argued that excluding long-term residents from access to citizenship undermines the legitimacy of democratic regimes (Walzer, 1983; Dahl, 1989), but this normative argument is not widely accepted among democratic states and is largely irrelevant for non-democratic ones.

The idea that the permeability of the citizenship boundary through naturalisation is determined by ethnic or civic conceptions of nationhood is, once again, intuitively plausible but needs to be qualified. First, governments may have many different purposes in their naturalisation policies. Demographic motives of expanding military power based on mass armies of citizens or territorial conquest through citizen settlers have played a major role in the past (for example, Weil, 2001). Replenishing a citizen population that is no longer able to reproduce itself because of shrinking birth rates may become an important consideration in the future. Mobilising new citizen voters for an incumbent political party has been another frequent reason for liberalising naturalisation practices. Naturalisation thus serves both purposes of exclusion (of undesirable new citizens) and selection (of desirable ones), but the criteria that define desirability vary enormously from immutable racial, religious and ethnic characteristics via linguistic competence to economic skills.

Singularity

A third purpose of citizenship laws is securing that the tie between an individual and the state is unambiguous and unique, which requires avoiding multiple citizenship. We can distinguish stronger and weaker versions of singularity. The strongest version is a principle of perpetual allegiance where individuals are seen to owe life-long loyalty to one particular sovereign. A norm of general avoidance of multiple nationality, which had been enshrined in international law from the late nineteenth to the late twentieth century, supports a slightly weaker version of singularity, as it allows for sequentially multiple citizenships over the course of an individual's life, but not for simultaneous ones. A third interpretation of singularity, which is the only one that we find among our set of European states, is even weaker in allowing for multiple citizenships acquired by birth, but not by naturalisation. Even this weak interpretation of singularity is, however, not present in many contemporary citizenship laws. States have conflicting interests in this regard and, as a result, chose different options. On the one hand, they want to make sure that their citizens do not have legal obligations and loyalties towards other states, but on the other hand, the price of enforcing a ban on dual citizenship will often be that their expatriates lose their citizenship of origin and that their immigrants have little incentive to naturalise. In Europe, the balance in these conflicts between state interests has been decisively tilted towards greater toleration of dual citizenship by developments in international law and by long periods of peaceful and friendly relations between states (Hailbronner and Martin, 2003; Faist and Kivisto 2007b; Blatter 2011; Vink and de Groot, 2010a, b). There are some countries that treat incoming and outgoing naturalisations asymmetrically, but in others lobbying on behalf of emigrants has contributed to removing a renunciation requirement for immigrants also (for example, in the dual citizenship reforms in Sweden in 2001 and Finland in 2003).

Special ties

A fourth basic purpose of citizenship laws is to secure citizenship for groups that are perceived as belonging to the society, polity or nation by virtue of their special ties, independently of their legal citizenship status. Special ties can be of an individual or collective type, and for each of these we find two kinds of provisions in citizenship laws. Individual special ties refer to a personal history, for example, one of family relations to citizens or former citizenship, which are taken into account by facilitated naturalisation for spouses and minor children or reacquisition, while collective special ties can refer to cultural markers that serve to identify individuals as belonging to the nation in an ethnic, cultural or religious sense or to historic ties stemming from a colonial or imperial past. The logic of this purpose leads to complementing provisions for ordinary residence-based naturalisation with others for special naturalisation in which residence and income requirements as well as citizenship tests are reduced or waived. The complete waiving of residence requirements even allows the naturalisation of extraterritorial groups, including ethnic kin minorities or spouses of citizens residing abroad. 'Special ties' arguments may also be used to justify promoting birthright acquisition for later generations of emigrant origin that lack genuine links but are seen to belong to an ethnic nation imagined as a community of shared descent.

Genuine link

A principle of effective and genuine link has been established in public international law through the 1955 judgment of the International Court of Justice in the *Nottebohm* case (Liechtenstein v. Guatemala, 1995 I.C.J. 4, 1955 WL 1, pp. 315–324). While it is contested how much this principle constrains self-determination of states in matters of citizenship, private international law has widely used it in order to determine the law of which state should prevail for dual nationals involved in disputes over family or property law (Vonk, 2012, Chapter 2).

We are here, however, only concerned with state interests and purposes in determining who their citizens are. In this respect, a criterion of genuine link may be regarded as serving a fifth major purpose, which is to avoid 'over-inclusion' by providing for a loss of citizenship in cases where individuals are no longer connected to a state in such a way that their individual interests can be seen as linked to those of the state. In contrast with special ties that serve primarily as a positive reason for access, genuine links are mainly applied negatively as reasons for loss.

Loss of citizenship can occur for two main reasons: because of voluntary renunciation and involuntary withdrawal or automatic lapse. Although many non-European states still adhere to a doctrine of perpetual allegiance and do not permit voluntary renunciation even after long-term residence abroad, no such states are

included in our set. Voluntary renunciation might be considered as an individual declaration that there is a lack of genuine link. However, one needs to consider that renunciation is often not entirely voluntary if it is a condition for acquiring the citizenship of a host country, which is in turn a condition for secure rights of residence there. Emigrants who renounce their citizenship for these reasons may still have genuine links to their country of origin. We interpret therefore only the withdrawal or lapse of citizenship after long-term residence abroad as serving the purpose of constraining membership through a genuine links criterion.

We are aware that these purposes overlap in multiple ways. Territorial inclusion is achieved not only by short residence requirements for naturalisation, but also by *jus soli* and toleration of dual citizenship; selecting citizens who have genuine ties suggests not merely withdrawal after long-term residence and acquisition of another citizenship abroad, but also restrictions on *jure sanguinis* transmission to second and later generations born abroad. Nonetheless, in order to test how strong these purposes are in different citizenship regimes, we need to link them with those functional components of citizenship laws that serve as primary or strongest indicators for an underlying purpose.

Data and Methodology

Data

For our comparative analysis of the legal principles applied by states in Europe to determine citizenship status we draw on a set of indicators of citizenship laws (CITLAW indicators) newly developed within the European Union Democracy Observatory on Citizenship (eudo-citizenship.eu). These indicators are based on a comprehensive qualitative database that includes current (2011) versions of citizenship laws, similarly structured country reports by national experts and a comparative typology of modes of acquisition and loss of citizenship with short summaries of corresponding provisions in national citizenship laws (on this typology, see Bauböck *et al*, 2006a, b, 2007; and in particular Waldrauch, 2006a, b). The data set covers 36 European states, including the current 27 EU member states and six accession candidates (Croatia, Iceland, Macedonia, Montenegro, Serbia and Turkey), as well as associated former EFTA states (Switzerland and Norway) and one European Neighbourhood Policy state (Moldova). CITLAW indicators were centrally coded applying coding principles developed jointly by a project team (see Jeffers *et al*, 2012 for details on coding).

In this article, we use the 12 CITLAW indicators that represent the functional components of citizenship laws introduced in the previous section. Table A1 summarises the operationalisation of these 12 variables and refers to the corresponding CITLAW indicators (as in this article we use a more intuitively understable set of indicator lables). The complete data set is available upon request from the corresponding author.

While it goes beyond the scope of this article to discuss the coding of each indicator in detail, a few remarks are important for the correct interpretation of the data and the results of the analysis. First, all indicators are coded on a scale from 1 to 2. We define 2 as maximum inclusion (or minimum exclusion) and maximum individual choice and 1 as maximum exclusion (or minimum inclusion) and maximum state power, given the basic assumptions and target category for the respective indicator. As explained above, our indicators measure inclusion not with regard to a single reference population of long-term residents, but with regard to varying target populations implied by particular functional components of citizenship laws. Moreover, many provisions (most importantly those on naturalisation and loss) involve decisions not only by the state, but also by the individuals concerned who chose between alternative legal statuses. In order to orient our CITLAW scale consistently for birthright acquisition, naturalisation, renunciation and withdrawal of citizenship, we need to combine inclusion with choice.

For example, for provisions on *jus soli* at birth, unconditional and automatic acquisition is maximally inclusive and scores 2 on our indicator, whereas the absence of any *jus soli* at birth provision scores 1; for the indicator for residence requirements for ordinary naturalisation, the *easier* it is to meet the residence criterion the higher the score; the civic knowledge and cultural assimilation indicator is *lowest* for formal tests with few exemptions or where questions are demanding and no study material is available; the voluntary renunciation indicator is lowest where individuals face the highest legal constraints for giving up their citizenship, whereas the indicator for loss due to acquisition of a foreign citizenship is 1 where individuals lose citizenship in such cases *ex lege* (lapse) and cannot prevent such loss by declarations or other actions. Often, we can define an endpoint on our scale conceptually, for example, in the case of *jus soli* where the minimum score means simply that no such provision exists. In other cases we need to determine the point of the maximum score empirically, for example, by looking at the maximum length of effective residence requirements for naturalisation.

Second, our coding rules consider material as well as procedural conditions specified in the law. Often, the effective impact of material conditions depends on procedural ones, such as whether state authorities can exercise discretion and whether individuals can change their status or prevent a change by declaration or other actions. We take this into account by assuming first a default procedure and then weighting preliminary scores if the actual procedure is different. For example, for provisions on loss due to voluntary acquisition of another citizenship, we start from an initial score of 1 for automatic loss in case of acquisition of a foreign citizenship, to which we add points for material constraints on state power of withdrawal. If the target person can then prevent such loss through a simple declaration of intention to retain citizenship, we increase the preliminary score again through multiplying it with a weight of 1.75. If the citizen himself cannot prevent loss, but authorities can exercise some discretion, the weight is much lower (1.25) but will still raise the indicator score compared with automatic loss.

For some indicators, we also need to take into account how material provisions interact with each other. For example, a residence requirement for ordinary naturalisation depends on three factors: the length of residence specified in the citizenship law, the type of residence status that counts for naturalisation and the years it takes to achieve that status, and the time for which a person may be absent during the years that count for naturalisation. Comparisons that are based only on the first of these factors are not really meaningful. We weight therefore the years counting towards naturalisation with a factor of 1.5 if continuous residence is required for more than 75 per cent of the period. If permanent residence status is required for the whole period, we add further years that take into account the additional time needed for acquiring this status. The resulting effective residence requirement is then standardised to fit our scale, so that the longest effective residence requirement leads to a score of 1 and the shortest to a score of 2.

Methodology

The primary goal of our analysis is to reduce this set of 12 functional components of citizenship laws to a smaller set of uncorrelated dimensions that represent most of the information found in the original variables. Given that our data set is composed of ordered categorical data, it would be erroneous to use standard principal component analysis (PCA), which assumes linear relationships between numerical variables. For that reason we use categorical principal component analysis (CATPCA), which is an optimal-scaling approach that allows variables to be scaled at different levels and is geared towards modelling non-linear relationships (Meulman *et al*, 2005, pp. 29–45). In our analysis we select a spline ordinal scaling level for all variables, which implies that information in the observed variable on both the grouping of objects in categories and the order of the categories is preserved in the optimally scaled variable. However, different from linear PCA, the intervals between consecutive categories are not assumed to be equal.

Non-linear and linear PCA are very similar in objective, method, results and interpretation, and the output of the CATPCA analysis can be interpreted in a largely similar manner as standard PCA (Linting *et al*, 2007, pp. 27–28). We thus present component loadings and also a graphical two-dimensional plot of object points, which can be understood as factor scores, indicating how each of the 36 states included in our analysis scores on each dimension.

Analysis

Table 3 shows the component loadings of the CATPCA analysis with the number of dimensions in the solution set at 2. The output highlights that the overall model accounts for 51 per cent of the variance, with the first dimension accounting for

Table 3: Component loadings

Principal component analysis for categorical data (CATPCA), with loadings > 0.4

	Dimension	
	1	*2*
IUSSOLI_BIR	0.596	—
ORDNAT_RESREQ	0.732	—
ORDNAT_RENREQ	0.679	—
ORDNAT_LANREQ	0.769	—
ORDNAT_ECOREQ	0.769	—
LOSS_FORCIT	0.573	—
LOSS_VOLREN	0.540	–0.550
LOSS_RESABR	–0.441	0.587
SPECNAT_REACQ	0.465	0.580
IUSSANG_BIR	—	0.669
ORDNAT_ASSIREQ	—	0.630
SPECNAT_CULAFF	—	0.606
Cronbach's α	0.798	0.644
Percentage of variance accounted for (cumulative)	31.1	51.4

$N = 36$.
Variable principal normalisation.
Source: EUDO CITIZENSHIP Observatory, CITLAW indicators.

around 31 per cent and the second for around 20 per cent. While the Cronbach's α scores confirm the internal consistency of these dimensions, there are three items with loadings between 0.4 and 0.6 on both components (loss due to voluntary renunciation, loss due to residence abroad and special acquisition by former citizens). This indicates some overlap between the two dimensions, which overall are negatively associated ($r = -0.66$).

Because of this partial overlap, we first check the reliability of the two-dimensional analysis by two re-analyses, setting the number of dimensions to 1 and 3, respectively. The first re-analysis shows that, in particular, '*jus sanguinis*' and 'special naturalisation based on cultural affinity' load very weakly on the first component (see Table A3). This confirms that a single-dimensional analysis of citizenship regimes would provide an incomplete picture as it misses key functional components. The second re-analysis confirms the reliability of two main dimensions as an added third dimension has a weak internal consistency (see Table A3).

After establishing that citizenship regimes in Europe vary along two main dimensions, we can interpret these dimensions in substantive terms as related to the two basic birthright principles: *jus soli* and *jus sanguinis*. While in the literature it is often assumed that these two principles are negatively correlated and constitute a mutually exclusive dichotomy between civic-territorial and ethnocultural regimes,

our analysis casts doubt on such a view for two main reasons. First, as shown by the nearly orthogonal relation between the indicators for *jus sanguinis* and *jus soli* in Figure 1, there is a strong independence between the two birthright principles and the broader dimensions they constitute. We find regimes where one or other of these principles prevails, but also regimes in which both dimensions are strong and others in which both are weak. Second, the two basic dimensions along which citizenship regimes are organised defy an easy civic–ethnic categorisation.

These two dimensions are structured by different principles of inclusiveness. *Dimension 1* differentiates citizenship regimes by the extent to which they are territorially inclusive. Regimes in states that score high on this dimension first of all are characterised by some form of *jus soli* at birth, which implies that the children and grandchildren of immigrants have either an automatic or facilitated access to citizenship by virtue of being born on the territory of a state. Second, these regimes are inclusive towards immigrants through an inclusive naturalisation regime characterised by comparatively low residence, language and economic resource requirements and no requirement to renounce the citizenship of origin, additional characteristics are acceptance of dual citizenship for emigrants, easy reacquisition of citizenship by persons who have lost or renounced citizenship in the past and easy voluntary renunciation of citizenship.

Dimension 2 differentiates citizenship regimes by the extent to which they are ethnoculturally inclusive. States that score high on this dimension are characterised by strong *jus sanguinis*, which implies a relatively easy transmission of citizenship

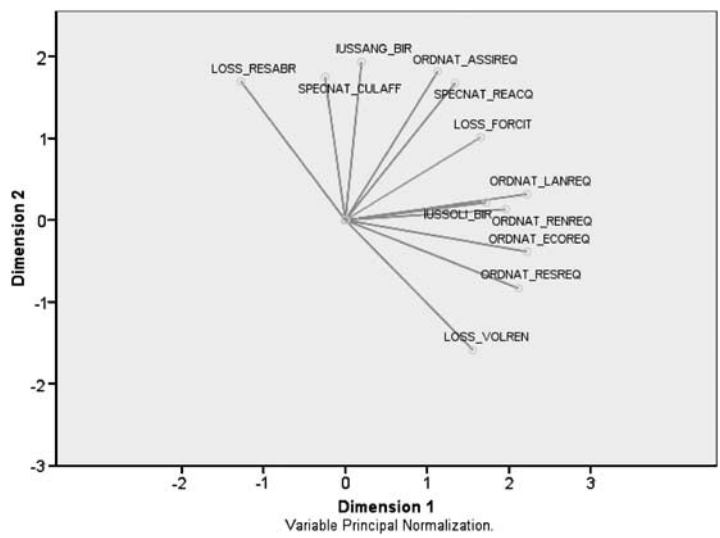

Figure 1: Component loadings (adjusted to scale of objects).

by parents to their offspring. Whereas regimes in most European countries are characterised by strong *jus sanguinis*, 2011 citizenship laws in some European countries had limits with regard to the transmission of citizenship by male citizens to their offspring, particularly when the child is born out of wedlock (for example, Austria, Denmark, the Netherlands). While arguably at odds with international human rights standards (see, for example, De Groot and Vonk, 2012), such obstacles in our view signal also a weaker conception of ethnocultural inclusion. In addition, strong ethnoculturally inclusive regimes are characterised by easy reacquisition of citizenship, facilitated access to citizenship based on cultural affinity, high obstacles to voluntary renuncation of citizenship and toleration of residence abroad (for example, no automatic loss of citizenship after a certain period of residing outside the country). The fact that these states also have comparatively low formal civic and cultural knowledge requirements for naturalisation (expressed by high scores on the indicator measuring citizenship tests as a condition for naturalisation) may seem puzzling at first glance, but demonstrates the more frequent reliance on informal cultural assimilation requirements that can be more effective in securing cultural community than formal citizenship tests

Furthermore, our analysis suggests that regimes differ not only with regard to the principles they use for determining citizenship statuses, but also with regard to the power of individuals to choose their citizenship status. This feature of citizenship regimes cuts across both dimensions, which is clearly illustrated by the contrasting attitude towards voluntary renunciation. Whereas states that score high on Dimension 1 tend to give full power to individuals to renounce their citizenship, states that score high on Dimension 2 tend to limit this power of individuals. We find the opposite associations with regard to involuntary loss due to residence abroad, with states scoring high on Dimension 1 being less tolerant of retention of citizenship after emigration than those close to Dimension 2. This finding supports our hypothetical description of the contrasting purposes of regulations on loss of citizenship in territorially and ethnoculturally selective regimes in Table 2. Whereas the former put more emphasis on a genuine link condition for the retention of citizenship abroad, the latter are more interested in retaining citizens abroad through intergenerational *jus sanguinis* but also by creating obstacles to renunciation.

Reacquisition is positively associated with both dimensions, which indicates that citizenship regimes that are either very inclusive towards immigrants, or towards emigrants, tend to be equally open for former citizens. While ethnocultural regimes have obvious reasons for privileging acquisition by former citizens, this finding is consistent with an interpretation of territorial inclusion as referring not merely to present residence, but to a territorial birthright community.

A tolerant approach to dual citizenship is associated with Dimension 1, both for incoming naturalisation (immigrants who acquire citizenship of a state) and outgoing naturalisations (emigrants who acquire citizenship of another state), which is understandable from the strength of the *jus soli* principle. However, dual citizenship

for citizens acquiring a foreign citizenship loads only moderately strongly on Dimension 1 and the intermediate position of the variable that measures the strength of provisions on loss of citizenship owing to residence abroad that indicates that this functional component does not differentiate well between citizenship regimes. This might be due to a noticeable convergence towards accepting dual citizenship in Europe over the past 30 years, across different regime types (Vink and de Groot, 2010a, b).

With regard to loss of citizenship, we see generally that it is difficult to lose citizenship of a state with a strong ethnocultural conception of citizenship (states that score high on Dimension 2). Not only is individual renunciation generally more difficult in such states, but residence abroad tends not to produce involuntary loss of citizenship. The protection against citizenship loss is less strong in states with a more territorial conception of citizenship, particularly with regard to residence abroad, which may lead to automatic loss of citizenship (unless statelessness would be the result). We find these provisions on loss of citizenship in countries such as Belgium, Ireland (though only for naturalised citizens), France and the Netherlands, to name a few. This territorial constraint contrasts with a generally tolerant attitude towards dual citizenship also among emigrants who naturalise abroad.

The final step in our analysis shows how countries configure in our two-dimensional citizenship space. Figure 2 shows a cluster mainly of Central and East European states and Mediterranean states that can be described as 'ethnocultural' *jus sanguinis* regimes (top half of graph), with rather strong variation on the 'territorial' dimension (for example, compare Latvia and Ireland). By contrast, the United Kingdom, Malta, the Netherlands and Belgium can be described as relatively strong *jus soli* regimes with weak *jus sanguinis* elements.

Insofar as both dimensions can be seen as inclusive towards different groups, immigrants (Dimension 1) and emigrants (Dimension 2), the positioning of Ireland in the upper right corner of the graph suggests that this country is the most inclusive of all 36 European states covered in the analysis. We should, however, note that this assessment refers only to the legal principles of the Irish citizenship regime. Analyses of naturalisation procedures indicate strong exclusionary mechanisms towards immigrants at the level of administrative implementation of the law (Immigrant Council of Ireland, 2011). If inclusiveness is conceptualised in purely territorial terms and therefore measured only on Dimension 1, then the pre-2013 Belgian citizenship regime is clearly the most inclusive one in our set.

By contrast, Denmark, and to a lesser extent also Estonia, Latvia and Austria are cases that score low on both dimensions. They can be characterised overall as relatively 'insular' or exclusionary regimes in which states exercise strong control over access to and loss of citizenship and individuals have comparatively less power to choose their citizenship status.

Figure 2 shows also that our typology of four regimes is empirically relevant as countries are fairly evenly distributed across these types, though the distribution is

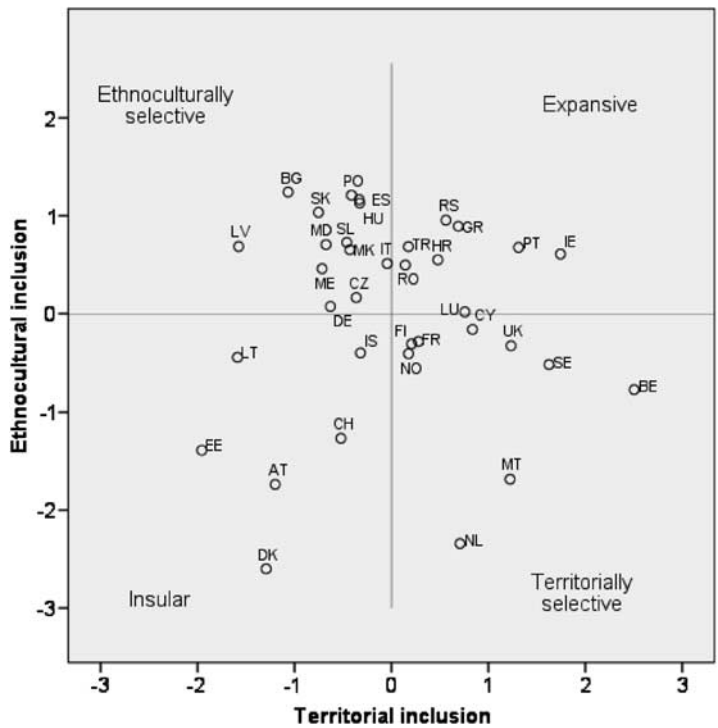

Figure 2: Citizenship configurations in Europe (object points).

skewed towards the upper-left quadrant where we find a plurality of 16 cases. Moreover, the graph also illustrates how with most Central and East European states characterised as ethnocultural regimes, it would be easy to misread an analysis based on states only from Western Europe that are scattered more widely across the other three quadrants. Figure 1 thus highlights the usefulness of an analysis based on a set of countries that is representative for Europe. Finally, drawing a regression line from the upper-left quadrant (for example, Bulgaria) to the bottom-right quadrant (for example, Belgium), might some readers interpret Figure 1as a confirmation of at least a moderate negative association between the two dimensions. From such a mono-dimensional perspective, cases such as Austria, Estonia, Denmark, Switzerland (in the bottom-left quadrant), Malta and the Netherlands (in the bottom-right), as well as Ireland and Portugal (in the upper-right quadrant) would thus be seen as outliers. Were such cases to be left aside, indeed a much more parsimonious story could be told. However, in our view, this would be a serious misreading of our analysis. Instead of seeing these cases as outliers, they illustrate the more complex nature and indeed richness of citizenship regimes in Europe.

Conclusion

Comparative analyses of citizenship regimes have made great progress since Brubaker's pioneering book of 1992. One aspect of this progress is the sheer availability and reliability of data. Initially, citizenship studies had to focus quite naturally on in-depth research about small numbers of states. Today, the EUDO CITIZENSHIP Observatory provides a database that covers all European countries apart from a few microstates. This geographic expansion is also a precondition for overcoming an 'Atlantic' bias in studies of citizenship that have in the past included mostly Northwestern European countries, comparing them occasionally also with the United States or Canada. Indirectly, this broader coverage has also meant that there is no more excuse for another pervasive selection bias in citizenship studies, which is their focus on 'old countries of immigration'. Our set of 36 European states includes not only old Northwestern and Central European immigration states, but also the Mediterranean EU member states that have experienced a transition from emigration to immigration countries since the 1990s and the 2004 and 2007 EU accession states, whose citizenship laws are much more geared towards including emigrants and ethnic kin minorities and rectifying exclusions during Communist rule. Comparison of a much greater variety of citizenship laws pushes thus towards a broader understanding of the purposes and dynamics of citizenship laws beyond their role of regulating the inclusion of immigrants and their offspring into the polity. Even a cursory glance at recent comparative literature shows, however, that the external dimension of the citizenship relation is still overwhelmingly absent or seriously underestimated.

We have started our analysis with the assumption that citizenship regimes cannot be reduced to a single dimension of inclusiveness. Citizenship laws define the conditions under which citizenship can be acquired or lost, both at, as well as outside, a state territory and serve a variety of purposes relating to the construction of constituent population of a state. Depending on historically contingent factors, demographic trends and political contestation, citizenship regimes can be typically inclusive for emigrants, while being exclusive towards immigrants, or vice versa. Yet, they can also be inclusive towards both groups, or towards none. On the basis of this general conception, we constructed a typology of the purposes of citizenship laws and linked these purposes to the functional components of such laws that correspond to comparable legal rules for acquisition and loss of citizenship. In a final step, we analysed how these functional components cluster into various characteristic citizenship regime configurations along two basic dimensions.

Our analysis based on comparative information on 12 core functional components of citizenship laws in 36 European countries demonstrates that states in Europe configure along two main dimensions that are driven by different conceptions of inclusiveness. While an important 'territorial dimension' characterises citizenship regimes on the basis of provisions on territorial birthright and ordinary naturalisation,

we show that legal variation cannot be reduced to this single dimension. For a comprehensive analysis of citizenship regimes, indicators of an 'ethnocultural' dimension, such as *jus sanguinis* and cultural affinity criteria for naturalisation, should also be taken into account. Our analysis also highlighted that apart from more typical ethnocultural or territorial regimes, a limited number of states are characterised by what we termed expansive regimes or, by contrast, insular regimes. Although further research remains to be done on the trends over time as well as on the explanatory patterns, the analysis of citizenship configurations in this article confirms our expectations about the multiple purpose of citizenship laws and demonstrates the empirical variety of regimes in Europe.

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Appendix

Table A1: Twelve indicators functional components of citizenship regimes: coding

Indicator	*Coding*
IUSSANG_BIR	Measures the strength of the *jus sanguinis* principle. This is a combined indicator based on the strength of *jus sanguinis* at birth in the country and at birth abroad. Higher scores indicate stronger *jus sanguinis*. CITLAW indicator: ASAN
IUSSOLI_BIR	Measures the strength of the *jus soli* principle. This is a combined indicator with a weighted score based on the strength of *jus soli* for second generation immigrants (double weight) and third generation immigrants born in a country. We take into account that inclusive *jus soli* for the second generation preempts the need for provisions for the third generation. Higher scores indicate stronger *jus soli*. CITLAW indicator: ASOL02
ORDNAT_RESREQ	Measures the strength of the residence requirement for ordinary naturalisation. This is a weighted score based on required years of residence, permitted interruptions and additional years required to obtain a residence permit needed for naturalisation. Higher scores indicate less onerous requirements. CITLAW indicator: ANAT06a
ORDNAT_RENREQ	Measures the strength of a requirement to renounce another citizenship for ordinary naturalisation. Coded on a 5-point scale between 'no renunciation requirement' (2) and 'requirement, without exceptions' (1). CITLAW indicator: ANAT06b
ORDNAT_LANREQ	Measures the strength of a language skill requirement for ordinary naturalisation. Coded on a 5-point scale between 'no language skill condition' (2) and 'certification or formal test at level B2 or higher or tests with writing component' (1). Formal language tests lead to lower scores than informal interviews. CITLAW indicator: ANAT06c
ORDNAT_ASSIREQ	Measures the strength of civic knowledge and cultural assimilation requirements for ordinary naturalisation. Coded on a 5-point scale between 'no requirements in the law' (2) and 'demanding formal tests' (1). Coding takes into account whether study material is available and whether there are exemptions (for example, for having attended school in the country). CITLAW indicator: ANAT06d

Table A1: *continued*

Indicator	*Coding*
ORDNAT_ECOREQ	Measures economic resource requirements for ordinary naturalisation. Coded on a 5-point scale between 'no requirement on income, employment or welfare dependency' (2) and 'economic requirements include employment condition or no welfare dependency for several years before application' (1). CITLAW indicator: ANAT06f
SPECNAT_REACQ	Measures the strength of possibilities for the re-acquisition of citizenship by former citizens. More onerous conditions and discretionary procedures lead to lower scores. CITLAW indicator: ANAT16
SPECNAT_CULAFF	Measures the strength of facilitated naturalisation of persons regarded as sharing ethnic descent or cultural and historic identity with the majority population of the country. Restrictions to residents in specific states, more onerous conditions and discretionary procedures lead to lower scores. CITLAW indicator: ANAT19
LOSS_VOLREN	Measures how easy it is to renounce citizenship. This is a weighted score based on how easy it is to renounce citizenship voluntarily by citizens residing in the country (weight 2/3) and by those residing abroad (weight 1/3). Higher scores indicate more freedom with less conditions. CITLAW indicator: LREN
LOSS_RESABR	Measures the strength of provisions implying involuntary loss of citizenship due to long-term residence abroad. Higher scores indicate stronger protection against loss (only if birth abroad or no prior residence in the country, if possession of another citizenship, after long residence abroad, withdrawal instead of automatic lapse). CITLAW indicator: LWIT02
LOSS_FORCIT	Measures the strength of provisions implying the involuntary loss of citizenship due to acquisition of a foreign citizenship. Higher scores indicate stronger protection against loss (only if birth or residence abroad; if citizenship has been acquired by naturalisation; if foreign citizenship is acquired by naturalisation; withdrawal instead of automatic lapse). CITLAW indicator: LWIT05

As the CATPCA software treats scores lower than 1 as 'missing', we have recoded the CITLAW data set from its original 0–1 scale to a scale from 1 to 2. The full data matrix is available in Table A2.

Table A2: Twelve indicators of citizenship regimes: data for 36 European countries (2011)

Country	*IUSANG_IR*	*IUSSOLI_BIR*	*ORDNAT_RESREQ*	*ORDNAT_RENREQ*	*ORDNAT_LANREQ*	*ORDNAT_ASSIREQ*	*ORDNAT_ECOREQ*	*SPECNAT_REACQ*	*SPECNAT_CULAFF*	*LOSS_VOLREN*	*LOSS_RESABR*	*LOSS_FORCIT*
Austria	1.63	1	1.29	1.5	1.25	1.25	1	1.06	1	1.75	2	1.31
Belgium	1.97	1.53	2	2	2	2	2	2	1	2	1.38	2
Bulgaria	2	1	1.44	1	1	2	1.25	1.69	1.75	1.25	2	2
Switzerland	1.75	1	1.12	2	1	1	1	1.75	1	1.25	1.38	2
Cyprus	1.94	1	1.59	2	1.5	2	2	1.75	1	1.75	1.38	2
Czech Republic	1.88	1	1.44	1.5	1.5	2	2	1.5	1	1.33	2	1
Germany	1.85	1.5	1.71	1.5	1	1.25	1.25	1.75	1.69	1.58	2	1.31
Denmark	1.82	1	1.38	1.25	1	1	1	1.06	1.38	1.83	1.63	1
Estonia	2	1	1.59	1	1	1	1.75	1.06	1	1.5	2	1
Greece	1.88	1.53	1.24	2	1.5	1.75	2	1.5	1.69	1.58	2	2
Spain	2	1.5	1.29	1.75	1.5	1.75	1.5	1.75	1.75	1.33	1.88	1.38
Finland	1.88	1	1.74	2	1	2	1.75	1.38	1	1.58	1.38	2
France	2	1.5	1.74	2	1.25	1	1	1.69	1.69	1.75	1.75	2
Croatia	1.94	1	1.74	1.25	1.5	1.75	2	1.75	1.69	1.67	2	2
Hungary	1.88	1	1.29	2	1.5	1.25	1	1.75	2	1.33	2	2
Ireland	1.97	1.75	1.88	2	2	2	2	2	1.75	1.33	1.38	1.5
Iceland	1.82	1	1.56	2	1	2	1	1.25	1	1.5	1.63	2

Italy	1.88	1	1.26	2	1.5	1.75	1	2	1	1.67	2	2
Lithuania	2	1	1.29	1	1	1	1.5	2	1.5	1.75	2	1
Luxembourg	2	1.5	1.56	2	1.25	1.5	2	1.69	1	2	2	2
Latvia	1.94	1	1.44	1	1	1.25	1.75	1.5	2	1.5	2	1
Moldova	2	1	1	1.5	1	1.75	1.75	1.75	1	1.25	2	2
Montenegro	1.94	1	1.29	1.25	1.5	2	1.25	1.38	1	1.33	2	1.25
Macedonia	1.88	1	1.18	1.25	1.5	2	1.75	1.75	1	1.5	2	2
Malta	1.38	1	1.88	2	1.5	2	2	1.5	1	2	1.44	2
The Netherlands	1.75	1.5	1.81	1.5	1.5	1	2	2	1	2	1.38	1.25
Norway	2	1	1.66	1.5	1.75	2	2	1.38	1.38	1.5	1.31	1
Poland	1.88	1	1.44	1.75	1.5	2	1.75	1.5	1.75	1.5	2	2
Portugal	1.94	1.75	1.65	2	1.5	2	2	1.75	1.75	2	2	2
Romania	2	1	1.59	2	1.5	1.75	1.75	1.69	1	1.75	2	2
Serbia	1.94	1	1.71	1.5	2	2	2	1.75	1.69	1.17	2	2
Sweden	1.94	1	1.74	2	2	2	2	1.75	1	1.83	1.63	2
Slovakia	2	1	1.35	2	1	1.75	1.5	1.5	1.75	1.5	2	1.25
Slovenia	1.94	1	1.29	2	1	2	1.75	1.69	1	1.17	2	2
Turkey	1.88	1	1.74	2	1.5	1.75	1.25	1.38	1.69	1.5	2	2
United Kingdom	1.94	1.5	1.81	2	1.75	1.25	2	1.75	1	2	2	2

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Table A3: Component loadings

(a) One-dimensional analysis

	Dimension 1
IUSSANG_BIR	0.193
IUSSOLI_BIR	0.613
ORDNAT_RESREQ	0.763
ORDNAT_RENREQ	0.595
ORDNAT_LANREQ	0.779
ORDNAT_ASSIREQ	0.434
ORDNAT_ECOREQ	0.781
SPECNAT_REACQ	0.538
SPECNAT_CULAFF	–0.315
LOSS_VOLREN	0.565
LOSS_RESABR	–0.534
LOSS_FORCIT	0.493
Cronbach's α	0.818
Percentage of variance	33.268

(b) (Three-dimensional analysis)

	Dimension		
	1	*2*	*3*
IUSSANG_BIR	0.123	0.647	–0.427
IUSSOLI_BIR	0.600	0.067	–0.398
ORDNAT_RESREQ	0.730	–0.273	–0.221
ORDNAT_RENREQ	0.662	0.018	0.573
ORDNAT_LANREQ	0.777	0.092	–0.230
ORDNAT_ASSIREQ	0.414	0.617	0.285
ORDNAT_ECOREQ	0.777	–0.126	–0.311
SPECNAT_REACQ	0.449	0.590	0.139
SPECNAT_CULAFF	–0.076	0.590	–0.415
LOSS_VOLREN	0.537	–0.562	–0.170
LOSS_RESABR	–0.446	0.599	–0.153
LOSS_FORCIT	0.539	0.349	0.567
Cronbach's α	0.797	0.635	0.371
Percentage of variance	30.91	19.96	12.62