Dual Nationality: Threat to National Identity, or Harbinger of a Better World?

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In the last few years, there has been a great deal of discussion, in journals of law and in the world of political philosophy and political science, of the significance of the rise in “dual nationality” or “dual citizenship” in the countries of immigration of North America and Western Europe. Dual citizenship also became an issue in politics and journalistic discussion in the United States, particularly when Mexico, the source of the largest number of immigrants, legal and illegal, to the United States, changed its constitution and its laws to permit Mexicans who had naturalized as American citizens in the United States to reclaim a form of Mexican nationality.

In some other nations—Germany in particular—the issue of dual nationality became a major controversy in politics and law. Germany confronted the problem of large numbers of immigrant workers and their children, particularly from Turkey, who held an ambiguous status as permanent residents but not citizens. The politics of granting them the opportunity for citizenship was muddied by the fact that Germany did not allow dual citizenship—naturalized German citizens could not retain their previous citizenship—and Turkish immigrants and their children were reluctant, for various reasons, to give up their Turkish nationality, and wished to preserve their citizenship rights in Turkey. Dual citizenship for immigrant workers and their children also became an issue in the Netherlands. In yet other countries—the United Kingdom and Canada, for example—dual nationality was no issue at all, even though many in their immigrant populations and their children were dual nationals. This seemed to occasion no concern in those countries. In the United States it became a major subject of discussion, but did not become a political issue.

In the United States, and elsewhere, the debate over dual citizenship was marked by two diametrically opposed points of view about citizenship, nationality, national loyalty, and national identity. On the one hand, there were those who were troubled about the implications of dual nationality or dual citizenship, alarmed at its increase, saw it as undermining the integration of immigrants into society and polity, and changing the entire meaning and understanding of national identity. The issue was particularly salient in the United States, where the successful integration of immigrants was considered one of the glories and achievements of American society and politics. In European countries which had become hosts to large numbers of immigrants from former colonial possessions, and of guest workers and their children, immigrants may have been looked upon somewhat less positively, and were less related, or rather not related at all, to the popular myth of the nation. But all these countries were under the influence of Western liberal and humanitarian values, which increasingly demanded and required equal rights for all. Further, it was realized that if these “foreigners” were staying permanently, it was desirable that they should be fully integrated as citizens of a common nation. Dual citizenship could be seen in these cases as hampering this full integration, threatening common understandings of loyalty to the nation and what it implied.

On the other hand, were a variety of points of view which argued that dual citizenship was an understandable and to be expected consequence of immigration, and more than that, offered a promise of a better world of multiple loyalties and identities, in which nationalism and chauvinism were reduced and toleration increased. Perhaps dual or multiple citizenship was an early stage in the rise of a new kind of multinational, cosmopolitan citizenship, better adapted to a globalizing world of increased movement and easy communication.
The issue of dual citizenship became a subject of concern and interest because the numbers of those who held the status of citizenship or nationality in two or more countries increased through immigration, and as many countries loosened their requirements that their emigrants give up citizenship in their home countries if they naturalized in another country. (While the two terms, citizenship and nationality, have somewhat different meanings, in the United States they are just about identical—every citizen is a national, and almost every national a citizen, and I will use them without differentiation.) In Canada, for example, which asks in its census about citizenship, and whether the respondent holds other citizenships, 4 percent of immigrants indicated they held 2 or more citizenships in 1981, 12 percent in 1996. There were also many who held two citizenships but were not aware of it. Dual citizenship in theory means being able to perform the roles citizens are entitled to perform in two different nations, and to claim the protection and rights citizens can claim from two different nations. It has become increasingly common in the major countries of immigration in the world, that is, the United States, the English-speaking dominions of Canada and Australia, and the prosperous countries of Europe.

The increase is an inevitable consequence of the increase in immigration in the postwar world, and the interaction of the three principal means of gaining citizenship: birth on the soil of a nation regardless of one’s parentage, birth to parents who are the citizens of a nation wherever that birth takes place and naturalization in a country of immigration. Immigration to a country which grants automatic citizenship on the basis of birth on its soil means that children of immigrants are at birth the citizens of two countries and depending on the laws of the two countries, that child might retain both citizenships into and beyond maturity. Naturalization in a country that permits dual nationality, of a person from a country that also permits it, means that the naturalized citizen also holds two citizenships. Other variations, such as birth to parents of two different nationalities, can further complicate matters, giving the child of such parents more than two potential nationalities. Yet other factors may increase the number of citizenships: for example, the ease with which Jews can hold Israeli citizenship, owing to the law of return which grants all returning Jews automatic citizenship, means that many Jews living outside Israel who once lived in Israel are also citizens of Israel. Descendants of Germans living abroad, even if their forebears emigrated centuries ago, can reclaim German citizenship, and may continue to hold the citizenship or nationality of the countries in which they and their ancestors have lived.

The American Case

In the United States, this increase in multiple citizenships followed on the major liberalization and revision of immigration law in 1965, and the increase in immigration since then. The United States, as a country of immigration, had always been familiar with the status—and the problems created—by multiple citizenship. But the steady and high volume of immigration of the last four decades, and the changes in the laws of many countries of emigration which permit their emigrants to retain their citizenship when they naturalize in a country of immigration, has greatly increased the number in this status.

On its face this status contradicts the major characteristic of citizenship as commonly understood, and certainly as it is understood in the United States, that is, loyalty to a single sovereign nation, which in turn also takes on the responsibility for the protection of the rights of its citizens. Dual citizenship or nationality had been a problem for the United States throughout the 19th century, beginning with its independence from England. During the Napoleonic wars, the United Kingdom refused to accept the naturalization of its subjects in the United States as removing them from their obligations to the King of England. So American seamen of English birth were impressed to fight on British war vessels. Other problems deriving from the earlier subject status of European immigrants who became naturalized in the United States arose throughout the 19th century and the first half of the 20th century, particularly when two World Wars raised the question of the obligations of naturalized American citizens to serve in the armies of their home countries.

Until recent decades, dual nationality was considered, by international lawyers and political leaders, both a bother and a contradiction to the very idea of citizenship in national states. In a world of immigrants it could not be avoided, both for countries of immigration and emigration. And both, in their laws, until recently generally tried to impose single nationality and citizenship as the norm.

But in the wake of the civil rights revolution of the 1960’s, a surprising change took place in the official American position in regard to dual nationality and dual citizenship. Multiple loyalties and multiple citizenships
were apparently forbidden for naturalized citizens by the strict American oath of naturalization that has been in one form or another required of naturalizing Americans since the 1790’s. The oath in its present form reads, in part:

I hereby declare, on oath, that I absolutely and entirely renounce and abjure all allegiance and fidelity to any foreign prince, potentate, state or sovereignty, to whom or which I have heretofore been a subject or citizens, that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear arms on behalf of the United States when required by law...

The naturalizing citizen, as one may note if one attends any of these impressive ceremonies in which hundreds or thousands each year become citizens of the United States, will generally rush off to the nearest facility where he or she can apply for a United States passport. If one reads the small type on the inside cover of a passport, one will see further apparent restrictions on dual citizenship and dual loyalty:

Law of Citizenship: Under certain circumstances, you may lose your citizenship by performing any of the following acts: 1) Naturalizing in a foreign state; 2) taking an oath or making a declaration to a foreign state; 3) certain service in the armed forces of a foreign state; 4) accepting employment with a foreign government; or 5) formally renouncing U. S. citizenship before a U. S. consular official overseas.

Nevertheless, the Supreme Court, in the course of its revolutionary rulings expanding rights for oppressed American minorities in the 1960’s and the 1970’s, also expanded the rights of naturalized Americans. While Congress remained silent, and the laws still apparently forbade service in foreign armies and various other acts indicating loyalty to another country, the Supreme Court ruled that these actions, apparently forbidden by the oath of naturalization, were no ground for the withdrawal of citizenship. The American government in practice accepted the fact that for many new citizens the retention of citizenship in their native lands was possible, and by many embraced, and that various actions—like voting in their home country’s elections, serving it as appointed or elected officials, serving in its army—were no grounds for loss of American citizenship.

As Yugoslavia and the Soviet Union broke up in the 1990’s, many Americans—they could be called that because of long residence and citizenship—who had come from the new countries that emerged from this breakup, returned to the lands of their birth to hold high position—in one case, indeed, as President of a nation (Esthonia), with no apparent consequences for their American citizenship. In 1990, Secretary of State Baker sent “telegrams to diplomatic and consular posts around the world which, while reiterating the U. S. government’s dislike of dual citizenship owing to ‘the problems it may cause,’ also specified that officials were to presume U. S. citizens wanted to keep their citizenships even when they obtained the citizenship of a another country or made a pro forma declaration of allegiance to another country.” The new American tolerance for dual citizenship was matched by important changes in major countries of emigration that supplied immigrants to the United States. Countries which had also previously been severe in insisting that naturalization in another nation meant the loss of citizenship, have changed their laws and practice: Emigrants to the United States from many countries can now retain their original nationality, with various rights that belong to citizens, including voting in elections and serving in government.

The most significant such change was that in the constitution and laws of Mexico, the source of the largest number of immigrants into the United States, legal and illegal, now numbering more than 15 million, and with their children considerably more.

What Does it Mean?

As I noted, there were two diametrically opposed responses to these developments. On the one hand, there were those who raised the alarm at what this meant for integration into the United States, for national loyalty, for an American integrated society, and a valued history in which group after group had come to the United States as foreigners and had been successfully in time incorporated into American society as Americans. This process was at the center of the idea of the United States. Major writers interpreting the meaning of American identity and Americanism had insisted that Americans (to use as I must the term that is most common to describe the people of the United States, despite its ambiguity of reference) were not an ethnic group, but an assemblage of those who adhered to an idea and an ideology. Or, if they were becoming an ethnic group—and this could hardly be denied,
because today “American” defines an ethnic group as much as the terms Englishman, Frenchman, German—, they were an ethnic group characterized not by a common origin, language, and soil at their beginnings. Rather, they were turning into an ethnic group similar to those at the core of other nations primarily because of their embrace of common ideas and ideals. But then what happened to this process as more and more of them embraced dual nationality?

Two of the chief figures in raising the alarm as to what the rise of dual citizenship meant for the United States were the political scientists Stanley Renshon and Samuel Huntington. Renshon wrote a number of provocative papers, published by the restrictionist Center for Immigration Studies, the most substantial of which, “Dual Citizenship and American National Identity,” appeared in October 2001, just following September 11, 2001, a pregnant date for this issue. He expanded his concern into a book published in 2005, The 50% American: Immigration and National Identity in an Age of Terror.

The expansion of dual citizenship was also one of the issues raised by the distinguished political scientist Samuel P. Huntington in his widely discussed book of 2004, Who Are We? The Challenges to America’s National identity. The book expressed alarm over the decline of a full and sole commitment by naturalizing immigrants, especially from Mexico, to the United States. More popular writers also were concerned by the issue, among them John Fonte, who also wrote a paper for the Center for Immigration Studies, “Dual Allegiance: A Challenge to Immigration Reform and Patriotic Assimilation,” and articles for various newspapers, and the columnist Georgie Ann Geyer, who published a book titled Americans No More: The Death of American Citizenship. And there were additional scattered comments in newspapers.

The issue continues to be noted by those who favor restricting immigration into the United States. One recent comment by an American resident in Mexico notes an oddity I have seen nowhere else: “In 2003, when the U. S. invaded Iraq, the Mexican government tried to exploit the situation. It announced a census of Mexican citizens (and soldiers of Mexican ancestry) serving in the U. S. military and negotiation with Saddam Hussein for the release of American prisoners of war who were also Mexican citizens!” This may be an apocryphal story—I do not vouch for its correctness—and, in the event as we know there were no American prisoners of war in Iraq, it reminds us of some of the complications of dual citizenship which led the United States and other countries to disapprove of it.

Despite the concerns raised by Renshon, Huntington, and the other writers I have mentioned, dual citizenship in the United States has not yet become a major issue.

On the other hand, there were those who greeted this development as the harbinger of a new kind of postnational or cosmopolitan or world citizen, one not linked to a specific nation with an identity that excludes all others as foreign, alien, other, not deserving of as full a measure of empathy or concern as one’s fellow-citizens or nationals.

There are various branches of this tendency. There are political philosophers who emphasize the selfishness of single-national and exclusive citizenship in a world in which some countries provide great social benefits, others nothing or little, and in which the nations of the first kind bar potential immigrants from nations of the second kind, and try with the most extreme measures to prevent them from gaining entry. As Irene Bloemraad writes, “a growing number of scholars suggest that traditional citizenship is fundamentally illiberal in today’s global world. According to [Joseph] Carens, citizenship in Western liberal democracies is ‘the modern equivalent of feudal privilege—an inherited status that greatly enhances one’s life chances.’” Others see dual citizenship as the inevitable and necessary accompaniment of a better and newer world: “Older notions of state sovereignty,” to again quote Bloemraad, “butt against advances in communication and transportation, the spread of international norms, a global economy, and in particular, substantial international migration. The consequences of globalization have led scholars to advance new approaches to citizenship, theories of transnational belonging [references omitted] and postnational membership.”

These tendencies have been particularly evident in Europe, where the inclination to patriotism—or chauvinism—is not as marked as in the United States, and where the rise of something like a common European identity, buttressed by new laws, rights, and statuses, mutes the exclusiveness of older forms of citizenship to the nation-state. Or so a number of social scientists have argued. Thus Yasmin Soysal has written a widely noted book, Limits of Citizenship: Migrants and Postnational Membership in Europe (University of Chicago Press, 1994), developing this position.

The sociologist Stephen Castles writes in the same vein:
... basing citizenship on a singular and individual membership in a nation-state is no longer adequate, since the nation-state model itself is being severely eroded. Instead, new approaches to citizenship are needed, which take account of collective identities and the fact that many peoples now belong more than one society.xii

To quote yet another formulation of this position, from the political scientist David Jacobson:

Clearly the basis of nation-state legitimacy is eroding.... Populated by bodies of people it cannot absorb in the conventional sense, the state adopts international legal codes that can account for such transnational actors. These actors themselves turn to such codes in making demands on the state.... These codes... have become progressively more salient since... the 1970's and 1980's.xiii

The citizen, as a specific political being attached to a specific state, seems to be on the way to being replaced by something like the universal human being, who has rights and claims in general, proclaimed in international agreements, and valid regardless of the political character of the territory he or she inhabits. Thus we have the claims made for the people of Darfur, or any other oppressed group: their rights should be recognized and made real by something like an international public opinion, operating through international agencies, or states acting in the name of such agencies.

Pierre Manent has given a subtle analysis of this development. What is emerging, he writes, is the notion of “humanity”, as against the “citizen.” World War II and the developments that have followed—in international organization, in the closer economic and technical linking of people throughout the world—have made the notion of humanity immediately obvious, with the conviction that we are now all “citizens of the World”, and conceive of a world “without borders.” At a time when humanity seems on the way to becoming unified, the nation, with its parochial character, its preference for itself, seems archaic, vaguely ridiculous, probably immoral, in any case fated to fade away.xiv

The advocacy of these various positions has not reached much beyond the world of sociological and political scholarship and analysis, but on occasion these arguments and points of view on the limitations or irrelevancy of traditional ideas of citizenship have reached a somewhat wider audience. So we may note an article of Martha Nussbaum arguing for a cosmopolitan or world citizenship, which became the basis of a volume which attracted a large number of commentators for and against (For Love of Country?, Boston: Beacon Press, 2002), and some of the writings of Amartya Sen (Identity and Violence: The Illusion of Destiny, New York: W.W. Norton, 2006). Sen delights in his multiple identities, which include a number of national affiliations. He retains his Indian citizenship, while serving as Master of a Cambridge college and professor in an American university, and this is not uncommon in the academic world, and perhaps also in the world of international business. But it is multiple citizenships on a mass basis that has been the subject of the concern of those who are alarmed at the growth of the phenomenon, and as I have noted, the alarm is greatest in the United States, though even there it is muted by the much greater alarm over the politically potent issue of illegal or undocumented immigration.

Dual Citizenship, National Identity, and the problem of Loyalty

Here was an issue that one would think would have to trouble us more and more as we moved into the 21st century, into a world of increasing immigration—or desires for emigration—, of large refugee flows, of globalization in the sense of greater ease and immediacy of communication, knowledge, and travel. As Peter A. Schuck, one of our most astute analysts of the issues of immigration and citizenship, wrote in 1998, “It is only a matter of time before Congress takes up the dual citizenship issue.”xv And I wrote, when I first addressed this issue in 2002: “Clearly this is an area of concern that has not been fully formulated or presented, but the discomfort is felt, clearer arguments will be shaped, and a larger debate will follow.”xvi As we may read on the back cover of one of the most substantial efforts to deal with the issue of dual citizenship: “Dual nationality has become one of the most divisive issues linked with the politics of migration in Germany and the United States.xvii

As I have noted, this was indeed the case in Germany, and some other countries of immigration. But despite the steady public agitation and political conflict over immigration in the United States, which reached a climax in a failed effort to pass a new major immigration law in 2007, despite major concern over terrorism since September 11, 2001, and the possible disloyalty of Americans linked to the lands and culture of terrorism, dual citizenship has not
become an issue in the United States. The major political issue about immigration in the United States has been and remains that of illegal immigration, or undocumented immigration, which has created a population of perhaps 12 million or more permanent residents in the United States, but dual citizenship—which characterizes far more legal immigrants and their children—remains a non-issue.

Congress has remained mute in the face of the Supreme Court’s determination that the oath of naturalization did not mean what it clearly seemed to mean, and that the words prescribed in the U. S. passport did not mean what they clearly seemed to mean. It remained equally mute as some of the major sources of immigration to the United States, in particular Mexico, changed its laws to permit American citizens born in Mexico and their children to reclaim Mexican nationality. Despite the permanent place of immigration as a major unresolved national issue, dual citizenship remained below the horizon of public and political attention.

Were Renshon and Huntington and others alarmed over this development raising a non-issue? Have they in effect lost the battle, and do Americans accept the reality of wider loyalties, of postnational or transnational loyalties and identities. Do they look benignly on the coming of a new world in which a person may be a citizen of a state, but that defines only part of his loyalties and identities, to the point where other states and nations may as fully engage his loyalty and identity? I don’t think this is the proper interpretation of the fact that dual citizenship has not—or better, not yet—become an issue in the United States.

One reason why dual citizenship has not become a major political issue is because the alarm raised over it has been over its possibilities, rather than actualities, over the potential consequences of dual nationality rather than its observable or significant effects. Mexican Americans, who became eligible to reclaim a form of Mexican citizenship after the changes in the Mexican constitution and laws, did not rush to do so. Few showed up at Mexican consulates to establish their legal status as Mexicans.

The “dog that didn’t bark,” was the way Randall Hansen titled an article over dual nationality in the United Kingdom in 2002. But I think this is premature, and the issue has been recast and become of somewhat greater significance in the wake of September 11, 2001, and with the increased salience and significance of terrorism from persons who may be formally citizens or nationals against the countries to which they formally owe allegiance.

The entire issue of dual citizenship, which is after all an issue of identity, of loyalty, of where one thinks one belongs, of with whom one will endure sacrifice, was recast by September 11, 2001. The issue became one of loyalties deadly to the nation of which one was formally a citizen and which might be concealed or overlaid by formal citizenship. The issue it turned out was not dual citizenship, but what citizenship implied, what it meant to the citizen, the naturalized citizen, the permanent resident.

Citizenship has always encompassed two very different things, one a legal status, and the other the emotional attachment which it is assumed comes with it. In the wake of 9/11, as issues of security became dominant, the question became, to what degree could one assume this link? If citizenship in its legal status gave privileges, and if it were not in the case of any individual connected to the attachment that one assumed came with it, could not the advantages of the legal status be used to unleash the terribly damaging attacks that the Islamic enemies of the Western countries of immigration have planned and launched, with their enormous consequences to the economies and sense of security of the major countries of migration, preeminently the United States?

This is a dilemma that every Western nation has had to confront, none more sharply than the United States. The terrible disruption that terrorists showed they could wreak in London and Madrid, and may still wreak in other great European cities, could have been variously implemented by citizens of foreign countries, dual citizens, or naturalized or native-born citizens of the very nation that they had chosen as a target.

Legal status as a citizen had not become less relevant, as the advocates of postnational citizenship or cosmopolitanism had hoped. It became rather an issue that had to be considered in the context of the entire picture of a defense against those who would do enormous harm if they could. Could one limit the actions one took to interdict terrorist attacks on the basis of citizenship? This has become a huge political issue in the United States. What telephones could be tapped, what conversations recorded, what evidence brought up in court became entangled with the issue of citizenship. Who might enter the country, and with what safeguards, became complicated by the matter of citizenship. The citizens of Western Europe could enter the United States without visas. Was this privilege also to be maintained when it came to naturalized or even native-born citizens who stemmed from Muslim states? It was his French citizenship that permitted the terrorist Moussaoui to enter the United States without a visa (not that a visas would have prevented his entry, but it might have been one more obstacle put in his way), and to train to fly airplanes into skyscrapers. It was also his French citizenship that led the French government to express
some concern over the possibility that he might face capital punishment, which is after all banned in most of Europe
But was Moussaoui really a Frenchman, a European, despite his citizenship?
As I write this paper, I read in the New York Times (September 5, 2007): “Eight Arrests in Bomb Plot in
Denmark.” “Six suspects were Danish Citizens, but they had Afghan, Pakistani, Somali, or Turkish backgrounds.”
Those who raised the issue of dual citizenship had a point, but they somewhat mischaracterized the target of their
concern. It was not the formal status of dual citizenship, which can mean many things. It was rather the central issue
of loyalty, identity, how the individual conceived himself, linked to what, a friend—or enemy—of what nation,
religion, ethnic group. And that issue of loyalty of course was the underlying concern that led people like Renshon
and Huntington to raise the question of dual citizenship. “Who are we?” as Huntington had asked. “The 50% American”,
as Renshon had worried. But dual citizenship was too crude a weapon to get to this underlying and
relevant concern. It was one relevant consideration, but only one. David Hollinger, writing in an issue of the journal
Daedalus on “Identity,” phrases the problem they are trying to address as one of “solidarity.” “The problem of
solidarity”, he writes, “is… at hand whenever people are capable of asking, who are ‘we’?” [The title, of course, of
Huntington’s book, but Hollinger would answer it somewhat differently.] The ‘we’ question is not new, but it now
arises with some urgency in an imposing range of settings… [G] roups with a proprietary relation to a land and its
institutions—such as the British and the Dutch and many other classically European peoples now coming to grips
with the reality of immigration—wonder if the newcomers alter the character of ‘we.’... [R] ecent events make it
plausible to suppose that among the greatest issues of the twenty-first century is the problem of solidarity, the
problem of willed affiliation.”
That is well put. The Mexicans—and there are many—who fight and die in the armed forces of the United States
may well be dual citizens, or perhaps not yet citizens of the United States at all, but that does not seem to affect their
actions as soldiers. If we take that most extreme consequence of becoming a citizen, as presented in the oath of
naturalization—taking up arms and risking one’s life in service to the nation—whether one holds dual citizenship or
not may have no consequences. Many prospective citizens join the armed forces because that eases the way to
citizenship—and for most, that will automatically make them dual citizens, both of the nation in which they were
born, and the new nation they have now adopted. Can one believe that such a drastic action as joining a military
force engaged in dangerous armed conflict does not reflect in a basic way a sense of where one belongs, with whom
one feels this “solidarity”, for after all in joining the military forces they are risking their lives. The wars of Israel
have been fought by armies filled with “dual citizens”—but their sense of solidarity was not affected by that.
The argument over dual citizenship and nationality has been shaped too much by possibilities and fears, rather
than realities. The issue has been surprisingly little studied to determine just what consequences in action result from
dual citizenship. And even those most insistent on the significance of the issue in the end did not propose major
changes in law. They have argued rather that we should return to the practices of an earlier period, when stronger
efforts were made—through English language programs, public school emphasis on patriotism, programs of
Americanization—, to instill that loyalty and solidarity that citizenship should ideally imply. The critics ask for a
better test of knowledge of American history and institutions as a prerequisite for citizenship, and the like. And we
have seen the same in other countries, such as Britain and the Netherlands, where many proposals have been made,
and some implemented, to supplement the requirements for the formal legal status of citizenship with new
requirements, weak as they may be, may contribute to the sense of solidarity

Conclusion

In the end, those who think of themselves as the core citizens of any nation will find something odd and
unsettling in the notion of a fellow-citizen in legal terms who is also of another citizenship and nationality.
Citizenship and nationality emerged as a distinctive status of the nation-state, which implies connection to a nation,
rather than simply the legal tie to a state. Whether we think of citizenship, to use Roger Brubaker’s important initial
distinction, as a matter of ethnic affiliation or republican loyalty and incorporation, we expect a more whole-hearted
and robust national identity from our fellow-citizens than is implied when two or more national identities are
mixed—the “German of Turkish origin,” the “Dutch citizen of Moroccan origin,” the “Pakistani Briton,” and the
like. This is particularly the case when the two terms suggest a large difference in culture, in religion, in custom, and
a potentiality for conflict between the two national terms.
Pierre Manent has pondered the implications of a citizenship beyond nations, connected to a larger political entity—Europe, for example—the kind of citizenship which the optimists about the emergence of a world of effective international human rights we have referred to earlier believe is coming. He emphasizes on the contrary the existing political validity and effectiveness of the national state. There is something murky and invertebrate about the notion of a world citizen dependent for his rights on a world community which as yet exists more as an emergent public opinion than as a power able to project the force that protects the rights it asserts all people properly possess. To quote one informed and perceptive reviewer of the book, one requirement of politics “is what Manent refers to metaphorically as a ‘body,’ meaning a recognized and limited group who are engaged together in a [common] enterprise [of some substance]. A political relation needs a ‘people’, some bounded number of persons who share a mysterious identity bred from things like common territory, mores, religious presuppositions, ancestors, belief in the same principles of government, memories and experiences, especially the experience of having struggled and spilled blood together.xix

Here Manent echoes Rousseau, when he writes:

It appears that the feeling of humanity evaporates and grows feeble in embracing all humanity....It is necessary to confine and limit our interest and compassion in order to make it active....Do we wish men to be virtuous? Then let us begin by making them love their country. But how can they love it, if their country be nothing more to them than strangers, and affords them nothing more than what it can refuse nobody?xx

Ethnic connection, in the history of our thinking and feeling about citizenship, was the primal, initial affiliation which made a person a good candidate for citizenship. It was considered a guarantee of some degree of solidarity. This was true even of that most “republican” of nations, the United States, which many insist has required only a political allegiance to its principles for citizenship. But ethnic, or in a larger form, racial, restrictions on citizenship prevailed for a century and a half: the United States restricted citizenship to the race which Americans considered both superior and kin, whites. It took a civil war to extend the privilege to blacks, a world war to remove all racial requirements. In time that requirement for primal connection was indeed discarded, which we all approve, but it became replaced with the requirement of what we may call a cultural affiliation not so very different from ethnicity in its significance as a basis for fellow-feeling.

That is in effect the point of the requirement that the prospective citizen know English (or Dutch, or German), that he or she know something of the history of the country, knows something of its core values. These tests have recently been strengthened. Recall the test of being American in some World War II movies, in which a fellow-soldier was suspected of not being sufficiently American, possibly a German in disguise, if he did not know enough about baseball. A crude test indeed, but a cultural one superseding a racial or ethnic one.

The simple ethnic or racial affiliation which was the test, in a simpler and cruder time, of adequacy to become a member of the nation has become replaced by the requirement of a political and cultural connection, and this begins to take on—it must take on—something of an “ethnic” coloring. So the notion of the American (or Briton or German or Frenchman) as a person connected only through political principles has something incomplete and indeed even false about it. Yes, to be an American legally requires only adherence to political principles (and knowledge of English, and a few other things) but it becomes something like an ethnicity. “American” becomes as ethnic a term, in its feeling tone, as Frenchman, German, Englishman, even though we are more ready than others to extend it to those who speak the common language with an accent, and are of nonwhite races. In that sense, Huntington was on to something, though he may have faltered in the details of what that ethnicity consists of. And for that reason, those who took the expansion of dual citizenship and multiple identities to be the harbinger of a new kind of world citizen, misunderstood the power, however changed by immigration and cultural change, of national identity, and the inevitability of discomfort in the face of an active dual citizenship.

That discomfort has only increased with the new threats from resurgent militant Islam, which showed its potential power in turning the technological superiority of the West against it on September 11, 2001. Citizenship and nationality have always implied the connection between a legal status, which gives rights and protects, and an emotional attachment. When we now see such strong evidence that among some these two can be sharply divorced, so that the first may enable the infliction of harm inspired by the second, we understand why dual citizenship, only one manifestation of this possible divorce, creates uneasiness.
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8 Centre for immigration Studies Backgrounder, 2005.


12 Stephen Castles, in Rainer Baubock and John Rindell, eds., *Blurred Boundaries: Migration, Ethnicity, and Citizenship*.


17 “Hansen and Weil, see footnotetesi.


20 Quoted in David A, Martin, “New Rules on Dual Nationality for a Democratizing Globe: Between Rejection and Embrace,” *Georgetown Immigration Law Journal*, 14:1, Fall 1999, pp.1-34. This interesting article by a former legal counsel of Immigration and Naturalization Service, records a change of mind, from opposition to acceptance, up to a point, of dual nationality.