1 Introduction

Increasingly many people today are 'multiple citizens'[1] – individuals who belong to, and have membership rights in, more than one state. Their exact number is not known. Few states have gathered or published data.[2] But from what is already known, these numbers are likely to be substantial. Furthermore, given the increasing acceptance of multiple citizenship in the citizenship laws of many states,[3] it is highly likely that their number increased rapidly over the past dozen years.

Some estimates are so rough as to be virtually worthless. For example, estimates of the number of US citizens with additional citizenships elsewhere vary wildly, between half a million and 5.7 million.[4] And it is said – once again, ever so roughly – that Western Europe harbours a total of 'several million and rising' dual citizens.[5] But in some places there are more precise estimates. For example, in 2009 the Netherlands had more than 1.1 million dual citizens (out of 16.5 million total population), three times the number in 1995.[6] And according to a Parliamentary Library brief, fully 23 per cent (4.4 million out of 19 million) of Australia's population were estimated to be dual citizens at the turn the twenty-first century.[7]

Even if precise numbers are not easy to come by, the phenomenon of multiple citizenship is clearly common, and increasingly so. As such, it is a phenomenon fully worthy of academic inquiry, at both theoretical and empirical levels. Yet despite significantly influencing the political and

[1] For convenience and clarity, throughout this book I will use 'dual citizens' and 'multiple citizens' – as well as 'dual citizenship', 'multiple citizenship', and 'plural citizenship' – interchangeably.
[2] The Australian Bureau of Statistics, for example, explicitly declined to gather data about Australian dual citizens. See Millbank 2000–1.
[3] De Groot 2003; Sejersen 2008.
[4] Faist and Gerdes 2008.
[5] Feldblum 2000.
[6] Nicolaas 2009.
[7] Millbank 2000–1.

economic life of states, multiple citizenship remains 'among the most understudied incidents of globalization'.[8]

I The Legal History of Multiple Citizenship

Prior to the liberalization of multiple citizenship, mono-nationality was the universal standard: everyone had to be citizen of one state only. Moreover, for a long time, state membership was considered to be an unbreakable tie. According to the doctrine of 'perpetual allegiance' – a remnant of the feudal system – one was supposed to belong to one state once and for all time. Blackstone's eighteenth-century *Commentaries on the Laws of England*, for example, holds that obligations to one's state are 'a debt of gratitude, which cannot be forfeited, cancelled, or altered by any change in time, place and circumstance … An Englishman who removes to France, or to China, owes the same allegiance to the king of England there as at home, and twenty years hence as well as now.'[9]

The doctrine of perpetual allegiance was one of the *casus belli* of the 1812 war between the United Kingdom and the United States. The United Kingdom refused to recognize the US naturalization of its subjects and impressed some of its expatriates (whom the United States insisted were UK ex-citizens) sailing under the US flag in order to make up for a shortage of sailors in its own fleet. Also, during the 1860s, some Western states (France, Prussia, and the Scandinavian countries) tried, upon their return home, to conscript some of their natives who had in the meantime become American citizens.[10] Moreover, in 1868, the United Kingdom prosecuted a group of naturalized Americans, members of the Fenian Brotherhood, treating them as natives despite their request to be tried by a special procedure reserved for aliens. The United States objected on the grounds that upon naturalization they were no longer British subjects but American citizens. In response, the American Congress also adopted the Expatriation Act in 1868, reasserting an individual's right to change allegiance from one country to another.

Across the second half of the nineteenth century, states gradually came to acknowledge a right to expatriation, thus ending the doctrine of perpetual allegiance. Yet expatriation was understood as only a swap of allegiance from one state to another (a trade, that is), not as involving a multiplication of the bonds of allegiance (as with multiple citizenship). Allegiance to the state was still supposed to be exclusive and

[8] Spiro 2008b, p. 189.
[9] Blackstone [1753] 1893, book I, ch. X, p. 369.
[10] Roche 1951, p. 282.

absolute.[11] International efforts aimed to reduce cases of multiple nationality,[12] first through bilateral agreements such as the Bancroft treaties,[13] and later through international treaties under the patronage of the League of Nations, such as the 1930 *Convention on Certain Questions Relating to the Conflict of Nationality Laws*.[14]

The proliferation of multiple citizenship in more recent times was facilitated by several shifts in international and domestic law in the post-war era. One was that, after 1945, with the growing professionalization of the military (fuelled subsequently by post-materialism and pacifist movements in the 1960s), citizenship was increasingly decoupled from military duties. In consequence, states increasingly started turning a blind eye toward the 1963 *Strasbourg Convention on the Reduction of Cases of Multiple Nationality and Military Obligations in Cases of Multiple Nationality*. Another important factor in the evolution of multiple citizenship was a set of decisions made by some law courts in Germany and France during the 1970s, recognizing a right to permanent residence for long-term immigrants.[15] Gender equality was a third factor spurring the expanding acceptance of multiple citizenship. From the 1980s onward, states began recognizing the right of women (as well as of men) to pass on their citizenship to their offspring (*jus sanguinis a patre et a matre*).

In consequence of all of those influences, under the 1993 *Second Protocol* amending the 1963 Convention and the 1997 *European Convention on Nationality*, dual citizenship was no longer banned. On the contrary, states now see dual citizenship as a powerful instrument incentivizing naturalization and promoting integration.

II Academic Reception and Debates

How did academics react to these developments? Unsurprisingly, the first academics to notice and discuss multiple citizenship were legal scholars. And as pointed out below, today's literature on multiple citizenship remains largely dominated by the legalistic perspective. But while

[11] Aleinikoff 1986.
[12] Throughout this book I will use 'nationality' and 'citizenship' interchangeably.
[13] The first treaties were conventions signed in 1868 between the United States and the German states (negotiated by diplomat and historian George Bancroft, hence the name), prior to German unification, relating to expatriation, military service, naturalization, and resumption of nationality. (The Bancroft treaties are available at https://archive.org/details/cu31924005227503.) Later, however, the United States signed similar conventions with other states as well (e.g., Mexico, China, Sweden, and Norway). See Boll 2007, p. 185, n. 40.
[14] Available at www.refworld.org/docid/3ae6b3b00.html.
[15] Weil 2002, p. 16.

rich in legal detail, such studies are theoretically remarkably thin, especially at the normative level. The rich normative and political implications of the phenomenon have thus so far passed with little comment.

A What Will Be Said

This book aims to fill precisely this gap. Its goal is to shed light on the ethical and political aspects of multiple citizenship, integrating this phenomenon with mainstream normative political theory. I will be thus less interested in the legal and empirical details of multiple citizenship as such, and more in how the phenomenon resonates with some of the burgeoning debates in political theory: debates concerning immigration and the boundaries of the demos, domestic and global equality and justice, public justification and deliberation, and commodification. Such a holistic and eclectic approach to the topic might, of course, leave narrower specialists on the topic of citizenship dissatisfied. Yet this book targets precisely that wider audience of mainstream political theorists, rather than the smaller set of citizenship specialists.

The main argument of this book is that, in its present form, multiple citizenship should not be embraced and defended indiscriminately. There are numerous reasons for that, which I discuss at length throughout the book: multiple citizenship may undermine the democratic consensus legitimizing collective decisions (Chapter 5). It sustains global inequality (Chapter 7). It may even compromise more ambitious cosmopolitan projects that are more morally justifiable and politically efficient (Chapter 8). Hence I discuss alternatives to multiple citizenship, as well as reforms that can improve its practice. These alternatives and reforms (Chapters 2, 3, and 8) capture all the advantages of multiple citizenship and more, while at the same time avoiding the problems it poses. The main alternative is an *unbundling* of citizenship rights and the granting of only a subset of full citizenship rights in the case of a second or third citizenship. Awarding people less than the full current bundle of citizenship rights in those circumstances would circumvent the over-inclusiveness that granting multiple citizenship can currently cause (see Chapters 6 and 8).

As will be clear by the end of this book, I do not propose any grand theory of citizenship. The main point of my constructive critique of multiple citizenship is, after all, that the category of citizenship as we know it should, at least in certain cases, be abandoned in favour of a more flexible separate allocation of the different rights and duties usually associated with it. One should not have to go through the burdensome process of becoming a citizen (potentially a multiple citizen as well) just

to have access to particular rights we have good reason to believe one should be entitled to on other grounds (residence, contributions, social ties, affected interests, and so on). Indeed, as the phenomenon of 'denizenship' shows, some states (in particular, Western liberal democracies) have already started decoupling some rights from citizenship, the most prominent example being that of foreign residents being entitled to vote in regional elections.[16] What I argue for is, if you will, a more extensive, systematic, and radical decoupling of rights from citizenship – an extension of denizenship rather than a proliferation of multiple citizenships. Instead of making people citizens, granting them all the rights of citizenship once and for all, states could grant particular categories of rights to people according to different criteria, for limited periods of time. Different rights could be allocated according to different principles in order to maximize democratic legitimacy, (global) equality, and efficiency. I will give some examples of different grounds we can envisage for the allocation of some categories of rights. Yet my basic point is simple: instead of granting people a second or third citizenship – instead of turning people into multiple citizens – we should grant them particular categories of rights without making them (much less requiring that they become) citizens.

Before elaborating the structure of the book and summarizing the themes of its component chapters, I will offer a brief overview of what scholars have already said about multiple citizenship. I will engage with, rely on, and offer challenges to many of these claims in the chapters to come. But that is for later. The aim of the summary that follows is merely to situate the book in the ongoing discussion, showing how its foci fit with, and differ from, those of the existing literature.

B What Has Been Said

Two different strands can be identified in the literature on multiple citizenship. In one camp are found the legal scholars (for example, Martin, Bosniak, Spiro, Schuck, Aleinikoff, Klusmeyer, and Hailbronner)[17] examining, with a light theoretical touch, the growing acceptance of multiple citizenship in both domestic and international law. In the other camp are found the social theorists and political scholars focusing on the effects of globalization (such as Soysal, Sassen, Castles and Davidson, Hansen, and Weil).[18] These two camps are by no means isolated from

[16] Hammar 1990.
[17] See Aleinikoff and Klusmeyer 2001; Bosniak 2001–2; Martin 1999, 2014; Martin and Hailbronner 2003; Schuck 1998; Spiro 1997, 2010, 2016.
[18] Castles and Davidson 2000; Hansen and Weil 2002; Sassen 2002b; Soysal 1994.

one another. Quite the contrary, they definitely *do* speak to one another. For example, after social theorists couched multiple citizenship as the epitome of postnationalism, legal theorists seized upon that thought and developed it further.[19]

Still, the literature on multiple citizenship is limited. It consists primarily of a few notable legal treatises[20] and various articles and chapters focusing specifically on this phenomenon mostly (with some exceptions[21]) from a purely legal standpoint.[22] Then there are several edited volumes combining legal perspectives with single country case studies.[23] Finally, there are some scattered references to multiple citizenship in works on postnationalism and globalization,[24] as well as in works on immigration and citizenship more generally.[25]

What general claims about multiple citizenship can be found in that scholarship? The first and perhaps most important claim concerns the *postnational* character of multiple nationality. Multiple citizenship is above all – and *wrongly* I shall argue (see Chapters 7 and 8) – embraced by the social theorists of postnationalism (from Soysal to Sassen) as an eminently postnational form of membership. 'Postnational citizenship' is an umbrella term capturing various global developments, such as

> the membership of the long-term noncitizen immigrants in western countries, who hold various rights and privileges without a formal nationality status; ... the increasing instances of *dual citizenship*, which breaches the traditional notions of political membership and loyalty in a single state; ... European Union citizenship, which represents a multitiered form of membership; and ... subnational citizenships in culturally or administratively autonomous regions of Europe.[26]

Postnationalists point out the fact that states are no longer the sole locus of democracy, identity, and solidarity or the sole depository of rights. Spurred by globalization, such developments (multiple citizenship included) signal the waning of state sovereignty, the denationalization of citizenship, and the advent of a new cosmopolitan order.[27] Most

[19] Bosniak 2001–2; Spiro 2008b.
[20] See Aghahosseini 2007; Boll 2007; Vonk 2012.
[21] Political theoretical approaches can be found in Blatter (2011) and Weinstock (2010).
[22] See, for example, Bloemraad 2004; Cook-Martin 2013; Faist 2001; Hammar 1985; Jones-Correa 2001; Kruger and Verhellen 2011; Martin 1999, 2014; Spiro 1997, 2010, 2016.
[23] E.g., Faist and Kivisto 2008; Hansen and Weil 2002; Kalekin-Fishman and Pitkänen 2007; Martin and Hailbronner 2003; Pitkänen and Kalekin-Fishman 2007.
[24] E.g., Castles and Davidson 2000; Jacobson 1996, 1998–9; Mathias, Jacobson, and Lapid 2001; Sassen 1999, 2002a, 2002b; Soysal 1996.
[25] See Aleinikoff and Klusmeyer 2001; Bosniak 2006; Schuck 1998.
[26] Soysal 2004, p. 335.
[27] Sassen 2002b, p. 279.

importantly, postnationalists have high hopes for postnational forms of membership like multiple citizenship to be more inclusive and global-egalitarian than standard membership, and thus better able to support an extension of the scope of justice from the domestic to the global level.

I debunk some of these claims in Chapter 7, where I focus on the global justice consequences of multiple citizenship. There I emphasize how it amplifies original inequalities and injustices in the allocation and exercise of state membership. Contrary to postnationalists, I argue that multiple citizenship is by no means globally egalitarian or more all-inclusive than regular state membership. On the contrary: it is accessible mostly to the global financial elites (see Chapter 4 on dual citizenship by investment) and considerably less to the global poor.[28] It is avant-garde all right, but in its elitist and exclusivist form! More importantly, multiple citizenship is far from being a brand-new cosmopolitan (or postnational), hence, *progressive* form of membership. Its distribution is still uniquely controlled by states; the rights and duties it enables are exercised inside these states; and, moreover, these states still claim that citizenship speaks to national identity, one way or another (note well the 'nationalism' inside 'trans*nationalism*', for example). In short, multiple citizenship is a very poor proxy for far more ambitious projects such as global citizenship (Chapter 8).

Legal theorists agree with social theorists when it comes to the post-national character of multiple citizenship, although they typically see it as more of a mixed blessing.[29] 'Plural citizenship both reflects and accelerates postnationalism', they agree, warning that the 'acceptance of plural citizenship is likely to lower the intensity of the citizen-state affiliation, and in turn, the intensity of bonds among citizens'.[30] Whether those developments are good or bad is, however, an open question. Some worry that multiple citizenship marks a devaluation of state citizenship, that it undermines exclusive attachment to a community and encourages strategic behaviour on the part of the individuals, and that it erodes the distinctiveness of national communities.[31] Even if they do not stem from sheer blind nationalism, such complaints reflect an obsolete understanding of state functioning. Setting aside any initial suspicion they might have had about it, in the end legal theorists accept that realistically

[28] Calhoun 2002.
[29] Spiro (2008b) was initially sceptical but in a later article is more favourable to a liberalization of multiple citizenship, seeing it as a way of lowering naturalization costs and boosting individual autonomy (Spiro 2010). The same can be said about other scholars as well. (See, e.g., Martin's other works cited above.)
[30] Spiro 2008b, p. 189.
[31] See Schuck 1998; Spiro 2008b.

states can no longer resist multiple citizenship. The best thing states can do in order to avoid becoming irrelevant is to *adapt* – with multiple citizenship being precisely one of the main adaptations that will permit states (and *state* citizenships as such) to survive, and perhaps even thrive.

A second important claim concerns the relationship between multiple citizenship and *democracy*. A major principle in democratic theory is that a *democratic* state cannot deprive a segment of its population of the right to participate in decision making. Multiple citizenship allowed states to integrate more efficiently large numbers of long-term immigrants. One reason for the latter's reluctance to naturalize was precisely the cost they had to bear upon doing so, namely, renouncing their citizenship in their state of origin. By accepting multiple citizenship, receiving states decreased the costs of naturalizing and thus encouraged naturalizations. Some claim there is a direct causal relationship between the increase in the number of naturalizations and this liberalization of multiple nationality.[32] That might well be the case.

But while dual citizenship may solve problems of political *under*-inclusiveness in immigration states, it stokes problems of political *over*-inclusiveness in emigration states. (It does so at least according to some democratic principles for constituting the demos, like the legally subjected principle.) In Chapter 6, I point out how this problem could have been easily solved: instead of keeping citizenship unitary but allowing for its duplication (that is, dual citizenship), states could have insisted on *unbundling* citizenship rights and allocating component rights separately. A disaggregation of citizenship rights would permit immigration states to integrate migrants politically without naturalizing them – by granting them political rights *only*. It would also permit emigration states to solve their *over*inclusiveness without losing their citizens (if another state requires them to renounce their previous citizenship upon naturalizing there) or denaturalizing their citizens (if this is the state's policy in cases where its citizens acquire another citizenship). The proposal would achieve that by allowing emigrants to keep, in their state of origin, the rest of the rights of citizenship, just not political rights as well.

The relationship between dual citizenship and *political participation* is less straightforward. It is not really known, for example, whether dual citizenship makes a difference for people's electoral behaviour, and if so what the difference is. Are dual citizens more or less likely to vote in elections? That is not known. The existing studies are ill-designed and too limited to give a clear answer (see my critique in Chapter 5).[33]

[32] Vink 2013.
[33] See, e.g., Escobar 2004; Roikanen 2011; Staton, Jackson, and Canache 2007b.

In this book, however, I set aside claims about the electoral behaviour of dual citizens and focus instead on other aspects of political participation, like public deliberation and collective rationality, which could well be affected by dual citizenship. In Chapter 5, I examine the ways in which dual citizenship disrupts one type of democratic consensus – meta-agreement – which serves the important function of legitimizing collective decisions.

Another common discussion concerning multiple citizens revolves around *jurisdictional conflicts* that can occur between the states of citizenship.[34] One main argument against multiple membership has, for a long time, been the potential conflict between a multiple citizen's military duties toward each of his different countries. As I have already noted, this was historically a major obstacle in the way of dual citizenship, but it is one that gradually disappeared as states professionalized their armies and abandoned compulsory military service. Still, other types of legal conflicts between states remain possible, since in addition to territorial jurisdiction states exercise personal jurisdiction over their citizens as well. The latter means that a state has an internationally recognized right to prosecute its own nationals for what it considers as crimes even if they are perpetrated on another state's territory, and perhaps even to prosecute nationals of other states for what it regards as crimes perpetrated against its own nationals, as well as to offer diplomatic protection to its own nationals wherever these might be.[35] Multiple citizenship makes it possible for several states to exercise jurisdiction, under one heading or another, over the same individual – thus making conflicts of jurisdiction between states more likely.

It has long been legally the case that dual citizens could not invoke the protection of one of their states of citizenship against their other state of citizenship. Such interventions were deemed to be unwelcome by the community of states insofar as they breached the principle of sovereign equality among states. This norm was repudiated, however, in the cases of the US-Iran claims tribunal, and it has come into question from then onward.[36] Dual citizens have come to enjoy extensive opportunities for jurisdiction shopping. The more countries persons are citizens of, the larger their set of options as to where to settle their legal affairs (with respect to various issues ranging from family matters to business dealings).

[34] See Oeter 2003; Orfield 1949.
[35] The passive personality principle is, however, often overruled in favour of other legal principles (e.g., the territorial principle). For a discussion, see Dickinson 1935 and Doyle 2012.
[36] See Aghahosseini 2007.

These legal and political consequences of multiple citizenship are certainly pertinent from the point of view of democratic theory, as I shall observe at various points in this book. Yet jurisdictional conflicts are only incidentally rather than uniquely associated with multiple citizenship. Accordingly, they figure in this book only occasionally and in passing.

III The Arguments to Come

This book consists of two parts. Part I examines the legitimacy of various *grounds of acquisition* of multiple citizenship and their justification. The chapters in Part I aim to answer several questions: Is multiple citizenship more or less legitimate depending on how it was acquired? And if so, why? I consider three modes of acquisition: birth, naturalization, and investment, each the subject of a dedicated chapter.

Chapter 2 focuses on *birthright* multiple citizenship. In an era of increased global mobility, more children are born into mixed multinational families, and hence more individuals become multiple citizens on the basis of their birth circumstances. *Jus sanguinis*, on its own or in combination with *jus soli*, can create a legal entitlement to multiple nationality. Some states, like Norway or Germany, have imposed restrictions on birthright dual citizenship, but not without stirring social protest. This chapter discusses whether such restrictions are legitimate and whether birth circumstances alone (blood ties to another citizen or birth on the state's territory) ought normatively give individuals moral entitlements to multiple nationality. I maintain that such arguments in favour of multiple citizenship – grounded in the special relationship between children and their parents or in the parents' 'right' to transmit citizenship to their children and the children's 'right' to take on this citizenship – are misguided and reflect a grave misunderstanding of the nature and particularity of citizenship as such. I conclude by introducing a policy proposal – a system of citizenship renewal – that would reform birthright (multiple) citizenship.

Chapter 3 explores multiple citizenship by *naturalization*. Naturalization rules and citizenship tests – citizenship conditionality, more generally – have been much-discussed among immigration theorists. Yet little has been said about the legitimacy of each and every naturalization requirement, taken separately. In this chapter I address two issues related to naturalization and multiple membership. First, I analyze the legitimacy of one naturalization requirement that makes a crucial difference to dual citizenship: the renunciation of previous citizenship requirement. I conclude that that requirement is morally problematic only if it is made

by the state of residence instead of by the state of origin. Second, drawing on the literature on choice architecture and nudging,[37] I develop a novel objection to dual citizenship via naturalization. I argue that what is morally problematic in such cases is that dual citizenship arises by default, rather than through an explicit individual choice. The reforms of naturalization procedures proposed in this chapter emphasize the importance of actively choosing one's citizenship (a concern found in Chapter 2 as well).

Chapter 4 focuses on multiple citizenship via *investment*. Although not all states grant citizenship upon investment, increasingly many do so. States (for example, Austria) that standardly require renunciation of previous citizenship upon naturalization tend especially to waive this requirement for investors, thereby allowing investors but not other individuals to become dual citizens. In truth, investor citizenship allows people virtually to 'buy' citizenship. Citizenship was not the first status historically to be put on the market, however. In this chapter, I put forward arguments against multiple citizenship-by-investment drawing on the analogy between the sale of citizenship and of noble titles. I explore the historical objections to the sale of honours and show how similar ones can be raised against investor dual citizenship as well. The aim of the chapter's central analogy is merely to reveal the ways in which markets undermine values that commonly are (and arguably ideally should be) associated with both systems of citizenship and systems of honours. Through this analogy, this chapter offers a broader than usual account of citizenship, bridging normative and historical perspectives on the topic.

Having discussed the modes of acquisition of multiple citizenship I move on to discuss, in Part II, its *consequences* at both domestic and global levels. At the *domestic* level, I study two mechanisms of decision making, voting and deliberation, to show how multiple citizenship can affect the legitimacy of decisions made by majority rule by undermining collective rationality. At the *global* level, I analyze the implications of multiple citizenship for global justice, and in particular its impact on global inequality, by focusing on its interplay with international taxation rules.

Chapter 5 explores the implications of multiple citizenship for *collective decision making* drawing on insights from social choice theory and psychology. An important source of legitimacy of collective decisions is their capacity to embody the coherent collective judgements and preferences of a political community – the collective will of a people. If they do not, they risk being meaningless. An important precondition for a coherent collective decision to be reached through majority rule is the existence of

[37] See Sunstein 2013a and 2013b; Thaler and Sunstein 2009.

a common frame of reference to guide collective decision making. I point out how dual citizenship could undermine collective rationality inside a community by exposing its citizens to alternative frames of reference guiding the decisions of another political community. Drawing on the psychology of perception, I then cast doubt on whether dual citizens will be able to systematically and reliably reformulate their preferences and reconstitute their judgements in line with their two different communities' frames of reference.

Chapter 6 studies multiple citizenship by reference to one of the hottest debates in democratic theory, the problem of *constituting the demos* (commonly known as the 'boundary problem'). It thus addresses a second aspect of collective decision making – the distribution of voting rights. Various principles have been proposed as a solution to the boundary problem. In this chapter I have in view three of them: the affected interests principle (Arrhenius, Goodin), the legally subjected principle (Miller, López-Guerra), and the unaffected interests principle (Frazer).[38] I start by noticing that migration constitutes a challenge for each of these three principles. What I am interested in, here, is whether or not multiple citizenship brings demos boundaries more nearly in line with those that are ideally prescribed by any of these principles. My argument is that it does not, and that other policies would do a better job in this respect. I argue that the problem lies in what is standardly seen as the inextricable tie between citizenship status and political rights. Breaking this tie – *unbundling* citizenship rights, and allocating political rights separately from the rest – can make demos boundaries congruent with those ideally prescribed by any of the aforementioned principles. I come back to one of these policy proposals in Chapter 8, the concluding chapter.

Chapter 7 focuses on the consequences of multiple state membership for *global distributive justice*. Is multiple citizenship more likely to serve the cause of global equality than mono-nationality? I argue that multiple citizenship accentuates global inequalities in virtue of two factors. One is the present regime for allocating multiple citizenship, which advantages the global rich. The second is the international norms regulating taxation, which favour the (typically more prosperous) states of residence over the (typically less prosperous) states of source. As regards the first factor, I note that citizenship acts like a gatekeeper of good or bad life opportunities and, by its exclusive character, locks people in what are advantageous or disadvantageous environments. This gives us a reason to neutralize the effects of citizenship *tout court*, whether mono-national

[38] See Arrhenius 2005; Frazer 2014; Goodin 2007; López-Guerra 2005; Miller 2009.

or multiple and whatever its mode of acquisition. But *multiple* citizenship magnifies those objectionable advantages. To address them, I propose that a separate tax be imposed on multiple citizenship. As regards the second factor, I argue that global inequality is aggravated by multiple citizenship coupled with an international double taxation regime favouring states of residence. Very briefly, this happens as a result of several things: first, double taxation regimes favour the state of residence over the state of source; second, dual nationals will typically prefer to reside in the richer of their states of citizenship, paying thereby their taxes to the richer state; third, dual citizenship will make individuals more likely to take advantage of double tax agreements and to do so in the longer term; and fourth, the global rich will have greater access to dual nationality, in turn allowing them to maximize their resources through double tax agreements. I propose two solutions to address the global inequalities aggravated by multiple citizenship. The first is a tax on multiple citizenship. The second is the introduction of a prioritarian clause in the OECD Model Tax Convention that would avoid double taxation but do so by always giving priority, for taxation purposes, to the most economically disadvantaged state having a potential tax claim on the same revenue.

In concluding, Chapter 8 begins with a short recap of the major claims found in the literature on multiple citizenship, closing the circle opened by this introduction. There I argue that those claims are misguided, by reference to the arguments developed in the substantive chapters of the book. But the concluding chapter does more than offer a mere recap. In the conclusion, I also return to elaborate upon one particular policy proposal offered in Chapter 6 as alternative to multiple citizenship: the unbundling of citizenship rights. I argue that many of the pitfalls of multiple citizenship discussed in all the previous chapters could be solved by that unbundling proposal. I then offer some fine-tuning of the proposal, identifying different variants of it and discussing implementation strategies for them. I argue in favour of one in particular: a *partial* unbundling, to be applied only to a second (or third or more) citizenship. In this way the conclusion lays the foundations for new theoretical work that would form a natural successor to this project.