

**Dual Citizenship in Germany: Portray of the main results of the research project
“Dual Citizenship, Governance and Education: A Challenge to the European Nation-States
(DCE)”¹**

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In GERMANY, dual citizenship is legally forbidden and only designed as an exception. Even though dual citizenship should be avoided as far as possible, the social reality looks different because of a growing number of people holding dual citizenship. Dual Citizenship is more and more reality.

1. Juridical, political, socio-cultural and educational aspects on dual citizenship

Relevant Legislation on (Dual) Citizenship in Germany

Rules for acquisition and loss of German nationality are defined in the German Constitution (Grundgesetz, GG), the Nationality Act² (Staatsangehörigkeitsrecht, StAG) and the Immigration Law (Zuwanderungsgesetz). German nationality can be acquired according to StAG § 3 by birth, by declaration, by adoption, by issuing a certificate according to the Federal Act of Exiles, and by transition as a German without German nationality in the sense of the Article 116 section 1 of the Constitution or by naturalisation (s. Schröter et al, 2005). The exceptions for acceptance of dual citizenship are stated in the Constitution (GG), the Nationality Act (StAG) and the Immigration Law (since 01.01.2005; before that the Aliens Act (AuslG)) (Hailbronner & Renner, 2001).

On 1st January, 2000, as the first step, the new Nationality Act came into force after a long and controversial legislative process (Dornis, 2002). For a long time, the principle of decent (*ius sanguinis*) has been characteristic of German Citizenship Law and remained basically unchanged. What is new is that the acquisition of citizenship by birth (*ius soli*) for a special target group was added, if the parents fulfil certain conditions. The principle of decent, however, still constitutes the major part of acquisition of citizenship (Renner, 2003). In this connection, the so called “Optionspflicht” was introduced, i.e., these children have to opt between the two nationalities on attaining maturity by the age of 23. Moreover, naturalisation was simplified because the right for naturalisation is granted after 8 years instead of formerly 15 years. In addition to the conditions as defined in the RuStAG, further criteria are defined. Until today, dual citizenship is not allowed and has to be avoided as far as possible. Thus, even after the reform of the Nationality Act in 2000, the principle of avoiding dual citizenship generally remains unchanged. There are, however, a number of exceptions³ which allow acquisition as well as accepting of dual citizenship under certain conditions by obtaining a Dual Citizenship Licence (Hokema, 2002; Renner, 2003, Heilbronner, 2001). With the reform of the Nationality Act, these conditions were extended and special cases are put in more concrete terms. The principle of avoiding multiple citizenship has led to two changes: 1) the elimination of the so called “Inlandsklausel”⁴ and 2) an extension of the possibilities to obtain a dual

¹ This report was written in the project DCE for the European Commission in 2006. It highlights the main results of the research project.

² The German Nationality Act (Staatsangehörigkeitsrecht, StAG) has a long history and is characterized by a high degree of continuity. It is based on the “Nationality Act of the German Empire and State (RuStAG) in 1913 (Sturm & Sturm, 2001).

³ New since 2000 are the following regulations: Older Persons (§ 87 Abs. 1 Nr. 4 AuslG, since 1.1.2005: § 12 Abs. 1 Nr. 4 StAG); Considerable disadvantages of economic nature (§ 87 Abs. 1 Nr. 5 AuslG, since 1.1.2005: § 12 Abs. 1 Nr. 5 StAG); Victims of political persecution/Political Asylum (§ 87 Abs. Nr. 6 AuslG, since 1.1.2005: § 12 Abs. 1 Nr. 6 StAG); Reciprocity with a alien holding the nationality of second member state of the European Union (§ 87 Abs. Nr. 6 AuslG, since 1.1.2005: § 12 Abs. 1 Nr. 6 StAG); Inlandsklausel (§ 25 Abs. 1 StAG)

⁴ With the reform of the Nationality Act, § 25 was changed in a way which was considered an important step towards the avoidance of dual citizenship (Renner 2003). Before the reform, the Nationality Act stated that Germans who acquire a foreign nationality lose their German nationality only if they reside abroad. Due to the deletion of this so called

citizenship Licence (Beibhaltungsgenehmigung) (Beauftragte der Bundesregierung für Ausländerfragen, 2002; Deutscher Bundestag, 1999)

After the reform of the Nationality Act, as the second step, the new "Immigration Act" came into force on 1st January, 2005, and replaced many other Acts (for example the Alien Act (Ausländergesetz (AuslG)) in the area of migration⁵. As above, it took many years to pass this law in a long, controversial process. For the first time in the history of Germany, integration was legally defined now. It includes the rights as well as the duties for joining integration classes. However, the German Migration Policy was not changed totally. The basic structures still remain unchanged (like in the Acts before). Some things were simplified (e.g., less residence titles) but other things were defined further (e.g., the preconditions for getting a residence title are tighter). In the legislative process, this Act lost much of its initial intention to simplify the immigration law in a modern way. Especially as a reaction to the incident on September 11th 2001, and other terror attacks, various defence and security measures were implemented (s. Schröter et al, 2005).

Socio-Cultural Perspective on Dual Citizenship in Germany

In Germany, the total number of dual citizens can only be estimated; no exact data are available. This absence of exact data is understandable due to the fact that dual citizens are officially regarded as Germans and their second nationality is not recorded statistically. It has to be pointed out, that a new "Mikrozensus"⁶ is in force since 1st January, 2005. In the future, not only the current citizenship of residence will be registered but also, for the first time, the citizenship of origin. For the first time, it will be possible to describe the integration of naturalised Germans or Germans with a migration history in detail (Newsletter Migration und Bevölkerung, Nr. 5, Juni 2005).

Political Perspective on Dual Citizenship in Germany

Because the multi-ethnic segment of the GERMAN society is structurally rather weak, the ethnic minorities in Germany are excluded from the society⁷ and they are politically dispersed. They could not develop to a real power in the social and political area. As a consequence, natives of German origin and foreigners differ significantly in regard to professional advancement, income and education level. Due to the experiences with the Citizenship Law in 1999/2000 and the resulting campaign against dual citizenship, the policy makers are discussing this issue in the society more carefully. For example, one political issue is the above described illegal acquiring of citizenship of origin after naturalisation in Germany, especially regarding Turks (Spiegel Online, 12.09.2005). Another issue is the so-called "Scheinvaterschaften" (fictitious fatherhoods): in the last few years the cases of so called "fictitious fatherhoods are heavily rising. These relevant children are especially

"Inlandsklausel", loss of German nationality is affected irrespective of the acquisition of a second nationality in Germany or abroad. This means an automatic loss of German citizenship (Wiedemann, 2000). This was mainly used by Turkish citizens in such a way that they became German citizens and naturalised in Turkey immediately after their release from Turkish nationality. However, giving up, or losing, the former nationality is an important precondition for acquiring German citizenship (Renner, 2002, Aydin, 2001, Sen et al. 2001). At the time being, between 40.000 and 50.000 naturalised Turks probably face losing the acquired German citizenship, due to violating the German law, in other words, having acquired citizenship of origin illegally (Spiegel Online, 07.02.2005; Das Parlament, 17.01.2005).

⁵ Until 31.12.2004 the Nationality Act (Staatsangehörigkeitsrecht, StAG), the Aliens Act (Ausländergesetz, AuslG), and the German Constitution were important for the acquisition and loss of German citizenship. Other important components are the General Administrative Regulations on the StAG (Verwaltungsvorschriften, StAG-VwV) and the General Administrative Regulations on the Aliens Act (DVAuslG). With the New Immigration from 01.01.2005 some legal acts were overruled. In connection with citizenship the most important overruled acts are: the Aliens Act from 1990 (Ausländergesetz, AuslG), the General Administrative Rules from AuslG (Verordnung zur Durchführung des Ausländergesetzes, DVAuslG) and Act for the Change of the Nationality Act (Gesetz zur Änderung des Reichs- und Staatsangehörigkeitsgesetzes)

⁶ The „Mikrozensus“ is the representative and official statistic of the state on the German society (www.destatis.de).

⁷ The main reasons for the exclusion of foreigners are the restrictive Nationality Act resulting in a restrictive naturalisation practice and the missing political rights, especially for people from Non-EU-countries.

from foreign mothers which are on the verge of eviction order. That means a German man accepts to be the father of a foreign child, even he is not the biological father. Thus, the child gets immediately the German citizenship, even this German man is not the biological father of the relevant child. In this connection the mother of the child doesn't have to leave the country any more. Both can stay in Germany now. The duty for departure will be overruled in this case. Since most of these men are getting social welfare, they do not even have to pay alimony for the single mother and her child (Das Parlament Nr, 46, 08.11.2004).

Dual Citizenship and Education for Democracy

In GERMANY, special education for dual citizens does not exist. But the educational opportunities for children with a background of migration have been more and more increased significantly over the last few decades. Nevertheless, surveys like PISA show, that there exists still a big cleavage in the equal opportunities between immigrant children and natives. One reason for this cleavage is that the basic philosophy of the German education system is mono-lingual and mono-cultural orientated. Although the children and student population are more and more multi-ethnic and multi-lingual, the German education system is still orientated towards the idea of a mono-lingual non migrant, who is socialised in a linguistic and cultural homogeneous society. This orientation is reflected, e.g., in the central position of the German culture in school curriculum as well as in lessons mainly taught in the German language. Furthermore, it has to be pointed out that each of the 16 federal states (Länder) holds the sovereignty over their education system. Thus, the introduction of intercultural curricula reaches different levels in every Länder and is not completed yet, even the Länder have set up more and more school acts, outline plans, and subjects related to intercultural objectives since 1996.

2. Attitudes of policy makers on dual citizenship in Germany

Description of Population

German translation and adaptation of the questionnaire compiled by the international consortium was distributed in face-to-face interviews, as online-questionnaire, and paper-pencil version with 135 different persons: members of the German and European Parliament, highly placed officials in government ministries, officials serving in local authorities, and officials from NGOs. Almost all areas or responsibilities regarding dual citizenship were mentioned, most of the respondents are working in politics (36%) or administration (23%). Furthermore many of our respondents encounter with dual citizens quite often: 42% state that they meet dual citizens once a day or at least once a week. Some respondents (26.7%) couldn't answer how often they face dual citizens.

81 (60%) of the respondents were male and 45 (33%) female. The average age is 48 years with a standard deviation of 10.6 years. The youngest participant is 21 years old, the oldest one 68 years. From those who provided information about their education, about 87% have an academic degree (17.8% have a bachelor, 43.7% have a master, and 20.7% have a doctorate degree). Only 5.2% have a degree below higher education. Not all of the respondents hold a German citizenship. Nine of the respondents (7.1%) hold dual citizenship. Furthermore are four respondents foreigners belonging to Austria, Italy, Portugal, and Turkey. From those, who provided information about their political affiliation, about 26,7% prefer the Social Democratic Party, 18,5% prefer the Christian Democratic Union, 15,6% Alliance 90/The Greens, and 5.2% the Liberal Democratic Party.⁸

⁸ Response to the closed questions were coded and entered into tables according to a code book with the help of SPSS software. For psychometric reasons several Likert-Scale items were sued. If there were more than five items relating to the same issue, factor analyses was used to analyse the findings and the dimensionality of the items. The item information were reduced to scales by using principle component analyses (PCA). To correlate the dimension we extracted the principal components with oblimin-rotation. The scales were constructed on the bases of the main loadings

Grating of Dual Citizenship

In GERMANY, dual citizenship is only allowed as an exception. Even though dual citizenship is still legally forbidden in Germany and only designed as an exception, 78.2% of the respondents stated that dual citizenship should be allowed and 67.5% answered that it ought to be encouraged. However, less than half (only 48.3%) agreed that dual citizenship should be available for all who apply. 79.8% of the respondents think it should be offered to immigrants from EU-countries, 68,4% to immigrants from countries outside the European Union, 61.7% agreed it should be offered to temporary immigrant workers and 73.1% agreed that DC should be offered to children of long-term residents. While in cases where citizenship was held illegally, only 39.8% thought that dual citizenship should be allowed to obtain it legally, the majority (60.2%) show that it should not be allowed in this case. On the other hand, 82.9% of the respondents disagreed that dual citizenship should be forbidden because of holders own allegiance to another state. Summing up, the participants of this survey show in the scale "allowance of dual citizenship" a general attitude pro or con the allowance of dual citizenship in Germany. That means either they are pro or con dual citizenship, but they don't differentiate between different reasons or target groups.

Revocation of citizenship

A strong tendency to reject all reported reasons for the loss of citizenship was recognisable. Most of the respondents were not willing to revoke citizenship. This fact goes along with the legal principle in the German Constitution (§ 16 Abs. 1GG) that German citizenship may not be taken away. Looking at the few respondents who opted for the revocation of citizenship, the most mentioned reason in the country of residence was "if they carry out a serious crime" and in the country of origin "if they move permanently to another country". One significant result of the survey is that the participants find it in generally easier to revoke the citizenship in the country of residence than in the country of origin. This could be approved for all mentioned reasons for revocation of citizenship, except for the reasons "no longer needed in the workplace". The respondents thought that persons who hold dual citizenship should lose the citizenship rather in the country of residence than in the country of origin. Less than half of the respondents thought that they should lose the citizenship of the country of origin. Also, 73% agreed that the revoking of citizenship will cause many psychological problems for the people concerned.

Rights and duties of dual citizens

Almost all participants agreed that dual citizenship should result in social (99.2%) and economic (97.5%) equality of the country of residence, and 95.8% agreed that DC should have the same rights and duties as others. 86.6% agreed that all members of society must share civic duties, too. By comparing the rights and duties in the country of origin with the rights and duties in the country of residence a significant difference was shown: the participants placed emphasis on the rights and duties in the country of residence with more than 88% agreement on each single item mentioned in this context. Most of the respondents agreed that people who hold dual citizenship should have the right to vote and stand for local and national elections in the country of residence and less than half think these rights apply to the country of origin as well. More than 2/3 of the participants agreed that *by broader acceptance of dual citizenship* the active political participation of immigrants will rise and that the right to vote in national elections will encourage the political integration of immigrants. Only some participants were aware of the problems caused by dual citizenship: only 19 respondents (16,4%) encountered obstacles in the diplomatic protection. Most of them mentioned that if dual citizens stay in the country of origin they have are not protected by the country of residence. Also,

of the PCA: By using the Cronbach's alpha-coefficient the reliabilities of the scales were examined. All in all we got eight meaningful scales (4 point Likert Scale: 1 for strongly agree, 2 for agree, 3 for disagree and 4 for strongly disagree) of good psychometric quality. For further analyses we take into account the sampling technique as well the small sample size.

only 39 participants (38,6%) knew of cases in which military service caused problems. The explanation is that military service, e.g., causes difficulties of loyalty or result from the duty to fulfil the military service.

Enrichment or burden for society

There was a slight tendency to see dual citizenship as enrichment for the German society and not as a burden. The respondents thought that dual citizenship enriches the socio-cultural fabric of the nation (71.7%) and the cultural resources (75%). Only 3.5% of the respondents agreed that dual citizenship spoils the native culture and 20,2% agreed that dual citizens create problems in society. Also, between 74-82% of the participants disagreed that the allowance of dual citizenship makes terrorism easier or that after the incident of 11th September, 2001, the principle of avoiding dual citizenship in Germany should be used consequently. Furthermore, only 19.6% of the respondents agreed that dual citizenship can be risky for the country because it undermines the national security. Almost 49.6% of the respondents thought that dual citizens constitute a burden on economy and 44.2% thought that dual citizens do not enhance the ability of the society to deal with social problems. 99.1% of the respondents state, however, that dual citizens must have a good command of the language of the country in which they reside.

Identity and citizenship

Almost all respondents confirmed that a European citizenship strengthens the allegiance between the European citizens. 72.5% of the respondents agreed that a European citizenship can not replace the dual or national citizenship. 74.5% of the respondents agreed that even when a European citizenship will exist, the national and dual citizenships are necessary. But 40.2% of the respondents agreed that the national citizenship should be replaced by a supranational European citizenship. Another cleavage between the participants is reflected in the attitude (1) if holding dual citizenship is important for the identity of the relevant people and (2) if it is discriminatory to refuse/forbid bi-cultural grown up individuals to hold a dual citizenship.

Citizenship education

In principle, interviewees supported citizenship education, with agreement varying from about 90,7% to over 99.1% of the responses. 99.1% of the respondents agreed that citizenship education should be taught in all schools. In regard to holders of dual citizenship, only 22.4% of the respondents reflected the opinion that those with dual citizenship need more intensive education for active citizenship than those who hold a single citizenship. Also, more than 2/3 of the participants agreed that the mono-cultural, mono-lingual and mono-national understanding of the German school system needs to be changed, as well as a more multi-perspective angle concerning language or culture has to be implemented into curricula.

Multiculturalism and citizenship

While 71.2% of the respondents disagreed that holding dual citizenship reduces the willingness for integration, 71.2% of the participants agreed that the acceptance of dual citizenship for the second and third generations encourages their integration. The opinions split in two: either the new implemented *ius soli*-principle will cause juridical, administrative and socio-cultural problems, or Germany should develop into a multicultural society. It is very interesting that the German scale on the concept of multiculturalism correlates significantly highly with seven out of eight scales, i.e., with almost all of the items. One explanation is that the items ask more general attitudes and not only attitudes towards dual citizenship. Thus, this scale shows more basic attitudes of the participants.

Comparison according to professional status

NGO officials showed a significantly higher agreement with the allowance/granting of dual citizenship in comparison with other respondents. One explanation is that a significant number of NGO officials hold dual citizenship or have a background of migration. Profession also influenced the attitude towards revoking of citizenship. 10% of the members of parliament and NGO officials agreed that carrying out a serious crime should lead to a revoke of citizenship. In contrast to that attitude 0% of government officials and 5.9% of local authority officials agreed that carrying out a serious crime should lead to a revoke of citizenship. Concerning the citizenship education towards respect and tolerance, the local authority officials did emphasize the education for respect and tolerance but they emphasize it lesser than the all other respondents. One explanation is that a significant number of local officials had marked "below higher education" as their education level. Furthermore, profession had a high impact on the attitude towards multiculturalism. NGO officials show a significantly higher agreement than government officials. In other words, NGOs do emphasize multiculturalism more than government officials.

Comparison according to political affiliation

The allowance of dual citizenship correlated with political affiliation. It catches the eye that voters of the Christian Democratic Party (CDU/CSU) agree lesser with the allowance of dual citizenship in comparison with the voters of other parties. Furthermore, whether dual citizenship is seen as enrichment or burden for society was strongly connected to the political affiliation. Most of the CDU/CSU-voters as opposed to the voters for other parties (SPD/The Greens/PDS) disagreed that dual citizenship enriches the society. Also, CDU/CSU-voters, in comparison to the voters for other parties, described dual citizens significantly more often as a burden for German society. Furthermore, the political affiliation has significant influence on the citizenship education of dual citizens. While most SPD-voters agreed that citizenship education especially for dual citizens is a good idea, most CDU/CSU-voters disagreed with that. The political affiliation shows a significant difference concerning the attitude towards multiculturalism, too. The more the political orientation of the participants is liberal, the more they support multiculturalism. Thus, the CDU/CSU-voters agreement with multiculturalism was lower in comparison with the SPD, Greens, and PDS voters.

Comparison according to background of migration

People holding dual citizenship or having a background of migration in comparison with people holding only German citizenship were more positive towards the allowance of dual citizenship. Furthermore, the revocation of citizenship in either the country of origin or the country of residence was more often supported by respondents holding a single German citizenship in contrast to respondents with dual citizenship or immigrant background. Another result was that people holding dual citizenship or having a background of migration in comparison with people holding only German citizenship were more positive towards the ideas of multiculturalism

Comparison according to education qualification

The higher the level of education of the respondents, the more they supported the granting of dual citizenship. Participants "below higher education" emphasised more disadvantages of granting of dual citizenship. Furthermore, the lower the level of education, the more the respondents agreed with the ideas that when the people concerned are no longer needed in the workforce in the country of origin/residence, or if they carry out a serious criminal act in the country of residence, the citizenship should be revoked. Significant differences were found regarding the citizenship education towards respect and tolerance, the learning context of citizenship education and the content as well as importance of citizenship education. The higher the level of education of the respondents, the more they agreed with the importance of citizenship education, the necessary respect and tolerance, as

well as the learning context. Moreover, the higher the education level of the respondents, the more they supported multiculturalism.

3. Citizens Perspective on Dual Citizenship

Description of the qualitative data

We realized 104 semi-structured interviews. Data were collected from people for whom (dual) citizenship is an aspect of their lives. In detail, ten in-depth interviews were done, 52 short interviews with the control group and 42 short interviews with dual citizens. From thus 10 in-depth interviews, five were done with people holding a single citizenship and five people holding dual citizenship. Open questions connected with the following categories were asked to the participants: Interest in dual citizenship; anticipated problems and advantages of holding dual citizenship; juridical dimension of dual citizenship; political dimension of dual citizenship; identity and belongingness to one (or two) nations; social integration and feelings of discrimination in different areas of live; perception of the importance of education for (dual) citizens.

Collecting Data

On March 7th 2005 we started with the field work and finished it in June 2nd 2005. Most of the interviews were contacted by telephone or Email. We realized face-to-face interviews, telephone interviews and group discussions. The face-to-face interviews were done in a special room at the university or in the interviewee's home. Furthermore some focus groups were asked, which means with more than one participant at the same time. Short interviews had a length of 20-30 minutes each. Furthermore ten interviews had a greater length. From these 10 interviews five were realized with people holding a single citizenship and five people holding dual citizenship. These interviews took about 60 – 90 minutes each. The interviews itself are recorded by tapes. Additionally a short biographical questionnaire was filled in from the interviewees. But not all of the interviews were fully transcribed, only a selection (34 from dual citizens, 37 from single citizens). All of the other interviews were transcribed partly. The tapes were transformed in written minutes. Only the linguistic utterances were transcribed. Emphases, breaks or pitch of the voice were left away.

Data Analyses

We studied and compared the experiences and views of the above described group of respondents along proceedings from the concept of qualitative content analyses of Mayring (2000). The five aspects of citizenship, namely the political, legal-juridical, socio-economic, socio-cultural, and educational dimension stated the basis for following analyses of the short interviews and the longer biographical interviews. We found that there was an additional dimension to the research design: the feeling of belongingness.

Description of Interviewees

After finishing the field work a data set with the answers of altogether 104 persons randomly was available for analysis. Looking at the methods for answering the questionnaire we got the following result: 48 respondents (46.2%) chose the face-to-face interview, 48 (46.2%) telephone interview, and 8 (7.7%) chose focus groups. All in all we interviewed 47 persons holding dual citizenship and 57 persons holding a single citizenship, either the German one or a foreign citizenship of the country of origin. The average duration for holding dual citizenship is 19 years with a standard variation of 13.8. The minimum for holding dual citizenship is one year, the longest one 56 years. 70 (67.3%) of all respondents are female and 34 (32.7%) male. The average age is 39 years with a standard deviation of 14.7. The youngest participant is 17 years old and the oldest one 73 years. Concerning the education qualification it can be seen that about 48% of all participates have an academic degree.

The analysis of the professional status shows that 31 (= 30.4%) participants are students, 15 (14.7%) are employees on a middle level, 12 (11.8%) are housewives, 10 (9.8%) are self-employed persons and 8 (7.8%) are retirees. The average duration for living in Germany is 22 years with a standard variation of 13.8. The shortest duration is one year living in Germany, the longest duration for living in Germany is 67 years.⁹

Perception of the meaning of Dual Citizenship

In GERMANY, a broad variety of meanings were mentioned. For some interviewees, citizenship was something replaceable and an administrative legal formality. For other interviewees, citizenship was part of their self-definition and identification. The more importance was attributed to citizenship, the more emotionality was raised and the more citizenship was part of the respondents' self-definition. Having a look at the meaning of dual citizenship, the same structure can be seen: the more attractiveness was attributed to dual citizenship, the more emotionality was raised and the more dual citizenship was part of the respondents' self-definition. Even though the personal meaning and importance of (dual) citizenship was very different, many dual citizens have emotional difficulties to decide which of the citizenships they would keep, if they had to give up one of them.

Costs and Gains of Dual Citizenship: Political, Legal, Social, Economic, and Personal Pros and Cons

In the second phase, we analysed the perceptions of political, legal, economic and social advantages, as well as disadvantages of holding dual citizenship. It has to be pointed out, that even if the attractiveness of holding dual citizenship is high, only some of the participants could explain in detail why it is advantageous to hold dual citizenship. It has to be kept in mind that the majority of the respondents said there are no advantages or disadvantages to being a dual citizen. The most mentioned benefits were: not needing a visa (legal), possibility for active political participation (political), possibility to study and work in the country of origin (economic), to be treated as a native in both countries (social) and bi-lingual competence (personal).

Granting and Revocation of Dual Citizenship

Most of the interviewees preferred the idea of not being forced to revoke the citizenship of origin and not having to choose between one of them. Some respondents clearly opted for the idea of holding only one citizenship and not granting dual citizenship to everybody. They explained that dual citizenship should come with strings attached and that the people concerned are torn enough between the two nations. The same opinion came up when asking about the so called "Optional Model". While some respondents thought choosing between one of the two citizenships is o.k., other respondents thought a forced decision for one citizenship causes many conflicts and is not a good idea.

Knowledge and Use of Rights and Duties of Dual Citizenship

Generally, in the matter of rights and duties, all interviewees pointed out clearly that they lack knowledge. Even those who felt they are enjoying all the civil rights were not certain that they know what they are. Especially non-German interviewees resented the fact that they do not have access to all the benefits Germans enjoy. In this context, the right to vote and to stand for national elections was often mentioned. Also, they pointed out that what they know about rights and duties they have learned by themselves or because problems occurred.

⁹ It is important to point out, that the interviewees are on very different levels of examination the issue dual citizenship. Many of the respondents are reflecting this issue during the interview for the first time. They did not really think about it before. Thus, many of them could not tell about e.g. advantages and disadvantages. As a consequence sometimes inconsequent statements were made.

Loyalty and Citizenship

While some respondents felt clearly constrained to Germany or their country or origin for different reasons, other respondents were still undecided. These respondents said they do not know clearly which country they feel more constrained to, that they feel constrained to both countries or that they do not feel constrained to one of them. To sum up, most of them cannot choose between the two countries they belong to.. By asking the respondents if conflicts of loyalty have happened to them, many agreed that conflicts of loyalty do not occur in their daily life. Only some respondents said that in specific situations, e.g., in times of war between the two countries or when they have had to choose one of the countries, they have experienced conflicts of loyalty. The same issue came up when asking the respondents to choose which country they feel a higher commitment to and when asking whether they are proud to be German. Both questions concerning commitment and pride were difficult for them to answer. It was obvious that they mulled over the issue and were not sure what to say.

Regional and Cultural Identity

Bi-national children show a clear tendency to describe themselves as European citizens or cosmopolitans. They prefer a higher frame of reference. In contrast to that fact, dual citizens of European countries described themselves as belonging to both nations, e.g., German-French, Italian-German. On the contrary, dual Citizens from Non-European countries described themselves more often as belonging to the country of origin, e.g., Columbian or American. Looking at dual citizens from Islamic countries, the description of identity was more difficult, because no clear tendency is visible. They expressed a very different response behaviour. Having a look at the regional identity of the interviewees, we can state that most of them were able to identify with a nation-state or the European Union. Only some interviewees could neither identify with a nation nor the European Union. Only some of the interviewees were able to identify with a district or a town.

Belonging and Citizenship

Looking at the belonging to the country of origin or second nation, all of the interviewees said that they still have close emotional ties to both nations. This can be, e.g., family ties, friends, holidaying or holding possessions. Furthermore, for all of them, the language of origin and the language of residence were very important. They said that language is one of the most important identity characteristics. They speak the language of origin quite seldom, but all of them give a high value to it.

Integration and Citizenship

While the dual citizens from European countries and bi-national children showed a tendency to describe themselves as fully integrated into the German society, dual citizens from Non-EU-countries (Islamic/Others) showed a tendency to describe themselves as not fully integrated, or only integrated in some areas. When asking about the importance of dual citizenship in the integration process, most of the dual citizens from European countries and Islam countries showed a tendency to agree that holding dual citizenship is not important for the integration into the German society. Bi-national children and dual citizens from Non-EU-countries showed another tendency. Their answers showed a clear difference: while some of them agreed that holding dual citizenship is important for integration, others disagreed. When asked what was important for their integration, the most common answer was the language skills.

Perception of the Citizenship Education

Not many of the participants were able to say anything about education for citizenship. First, the subject as such is unknown in Germany and instead, education concerning matters of citizenship is divided between various subjects. Second, because the interviewees had no experiences of the

subject as such, the answers were rather abstract. Third, each of the 16 Federal states (Länder) hold the sovereignty over the education system. Thus, you will get 16 individual answers in Germany - for every single Federal state another one. Each respondent had different experiences, different level of advancement, etc. In sum, the respondents thought that learning about the values and behaviour in democracy is an important issue and that more advancement should be implemented in different areas.

4. Conclusions

In GERMANY, it is not possible to provide exact statistical data on the number of multiple citizens living in the country. The estimated number of holders of dual citizenship is around 2 million people. The biggest subgroup within the group of multiple citizens are the so called "Aussiedler" (ethnic Germans living within the borders of the former "Deutsche Reich") who - because of their status as "Statusdeutsche" who are already regarded as Germans - have not been registered in any statistic related to foreigners or naturalisation. Another huge group of holders of dual citizenship that are not registered are the children of bi-national parents. Among the foreigners that have been allowed to maintain their original citizenship (as they meet the exceptions expressed in § 87) the biggest groups are citizens from Turkey, Iran, former Yugoslavia, Afghanistan, Lebanon, and Morocco.

In Germany, exists is a wide range of educational offers for migrants on the level of the Federal Republic, the Federal States and the communities. They are also very heterogeneous from the point of objectives. Most of them depend on the juridical status of a person. In consequence, the "Aussiedler" groups, foreigners and refugees are all treated differently. Currently, integration of naturalised persons is one of the topics being discussed. In Germany, within the educational system, the focus lies on the promotion of reading and speaking literacy (e.g., bi-linguality, German as a second language etc.) which are seen as the basis for successful integration. In 1996, the Standing Conference of Ministers for Education and Culture of the Länder agreed, for the first time, to include intercultural aspects in the curricula. However, in 2003, many of its suggestions and recommendations have not been realised, yet.

Germany is not a classic immigration country, such as the USA or Canada with long histories of immigration, multi-ethnic tradition, self understanding as inclusive nation-states and comparatively well placed minorities. All of these elements are missing in Germany. Thus, Germany is more an immigration country of a modern type. Since her establishment, Germany has been a society of natives, i.e., a country of Germans and not of continued immigration. The continuing multi-ethnic immigration is a new phenomenon in Germany. These differences in the immigration history interfere with the social structure, the culture and the self-concept: since her formation, Germany has basically been a mono-ethnic society, i.e., a nation-state in the sense of an ethno-cultural nation. Belonging to the German culture, based on seemingly objective ethno-cultural criteria, is the uniting bond between the citizens (Geißler 2003; Goes, 1997; Hagedorn 2001). Remembering the raising of the term "nationality" in National-Socialism-Germany and its terrible consequences, it becomes apparent why the Germans are still very sensitive concerning the nation. The nation is considered as the central identification factor and as the stabilize of/balance to the state? One consequence of her history is that the German Nationality Act has a long history (Nationality Act of the German Empire and State (RuStaG), 1913) and is at the same time characterised by a high degree of continuity (principle of decent (*ius sanguinis*)). Another consequence is that until 1998, Germany did not explicitly regard itself as an immigration country although the last decades were strongly characterised by immigration. In 1998, the change of the government marked a turning point in the immigration and citizenship policy, because they acknowledged that an irreversible process of immigration had taken place. All of these developments have an influence on the interaction with dual citizenship and on the still assert principle of avoiding dual citizenship as much as possible. First

steps in another direction were made with the reform of the Nationality Act (2000) and the introduction of the principle of birth (*ius soli*), as well as with the introduction of the Immigration Act. Both reforms add changes, but maintain the prevailing ideas. They are certainly no shift off the main direction. For example the *ius soli* regulations in the Nationality Act are limited to a special group and only if they fulfil certain conditions. It is preferable to broaden this regulation to include other groups of foreigners living in Germany. Also, the legal exceptions for holding dual citizenship were enlarged. In some cases the preconditions are highly complex and in other cases the administration praxis differs in every single Federal State. A unification of the administrative practice as well as simplification of the legal regulations is desirable.

Another problem is the high degree of nescience. Both the policy makers who are responsible for the area of dual citizenship and the citizens holding dual citizenship show poor, even false, knowledge about these phenomena. Some of them even started to think about it during the interview. Thus, for the people concerned, better information as well as education concerning the rights, duties, consequences, problems and benefits of dual citizenship are important. Another point is the missing statistical data about people holding dual citizenship. Even though the "Microcensus" was reformed, there are no official statistical data available about the holders of dual citizenship. For further legal reforms as well as representative research, it would be necessary to describe and characterise this group in detail.

Another important point in thinking of dual citizenship is that we focus mostly on people with a background of migration. Based on Germany's history, it is important not to forget the people holding a single citizenship and without background of migration in the upcoming public and political debates on immigration issues. From a legal viewpoint, dual citizenship is only one form of regulation. Personally or emotionally it means more – often it is interpreted as something special, a privilege. Thus, a public debate as well as implementation of education for citizenship which broach the issue of (bi)nationality, (dual)citizenship, its meaning and its consequences is essential in the future (Schröter et al., 2005).

5. References

- Aydin, K. (2002). Eine erste Bilanz. In H. Storz & C. Reißlandt (Eds.), Staatsbürgerschaft im Einwanderungsland Deutschland. Ein Handbuch für die interkulturelle Praxis in der Sozialen Arbeit, im Bildungsbereich, im Stadtteil (pp. 105-133). Opladen: Leske+Budrich.
- Beauftragte der Bundesregierung für Ausländerfragen (Ed.). (2002). Bericht der Beauftragten der Bundesregierung für Ausländerfragen über die Lage der Ausländer in der Bundesrepublik Deutschland. Bonn: Bonner Universitäts-Buchdruckerei.
- Bundesministerium des Inneren (BMI), Pressemitteilung (2005). Deutsche Staatsangehörigkeit kann verloren gehen! Pressemitteilung vom 27.05.2005, www.bmi.bund.de/cln_028/nn_122052/Internet/Content/Themen/Aussiedlerbeauftragter.htm. vom 12.09.2005
- Bundeszentrale für politische Bildung & Netzwerk Migration in Europa (2005c). Newsletter Migration und Bevölkerung, Ausgabe 5, Juni 2005, www.migration-info.de 22.09.2005
- Bundeszentrale für politische Bildung & Netzwerk Migration in Europa (2005a). Newsletter Migration und Bevölkerung, Ausgabe 1, Februar 2005, www.migration-info.de 22.09.2005
- Bundeszentrale für politische Bildung & Netzwerk Migration in Europa (2005b). Newsletter Migration und Bevölkerung, Ausgabe 2, März 2005, www.migration-info.de 22.09.2005
- Das Parlament (2004). CDU/CSU-Fraktion will gegen Scheinvaterschaften vorgehen. Das Parlament, Aus Politik und Zeitgeschichte, Nr. 46 vom 08.11.2005, www.bundestag.de/cgi-bin/druck.pl?N=parlament vom 12.09.2005.

- Das Parlament (2005). Gegen deutsches Recht verstoßen. Das Parlament, Aus Politik und Zeitgeschichte, Nr. 03 vom 17.01.2005, www.bundestag.de/cgi-bin/druck.pl?N=parlament vom 09.09.2005.
- Deutscher Bundestag. Referat Öffentlichkeitsarbeit (Ed.). (1999). Reform des Staatsangehörigkeitsrechts - die parlamentarische Beratung. Bonn: Selbstverlag.
- Dornis, C. (2002). Zwei Jahre nach der Reform des Staatsangehörigkeitsrechts - Bilanz und Ausblick. In K. J. Bade & R. Münz (Eds.), *Migrationsreport 2002: Fakten - Analysen - Perspektiven*. Frankfurt: Campus Verlag, pp. 163-178.
- Faist, T. e. (2005). Doppelte Staatsbürgerschaft: Determinanten der deutschen Politik. In Y. Schroeter & C. Mengelkamp & R. Jäger (Eds.) (2005), *Doppelte Staatsbürgerschaft - eine interdisziplinäre Herausforderung*. Landau: VEP.
- Geißler, Rainer (2003). Multikulturalismus in Kanada – ein Modell für Deutschland. Aus Politik und Zeitgeschichte, B26/2003. http://www.bpb.de/publikationen/XPXZV2,0,0,Multikulturalismus_in_Kanada_Modell_f%FCr_Deutschland.html vom 22.09.2005
- Green, Simon (2000). Between Ideology and Pragmatism: the politics of dual citizenship in Germany. ECPR Joint Section, 14.-19. April 2000, Copenhagen.
- Goes, N. I. (1997). Mehrstaatigkeit in Deutschland: Verfassungsrechtliche Kriterien, internationale und europäische Determinanten, Rechtsvergleichung. (1 ed. Vol. 2). Baden-Baden: Nomos Verlagsgesellschaft.
- Hagedorn, H. (2002). Wer darf Mitglied werden? Einbürgerungen in Deutschland und Frankreich im Vergleich. Opladen: Leske + Budrich.
- Hailbronner, K., & Renner, G. (2001). Mehrfache Staatsangehörigkeit und Staatenlosigkeit - Rechtsvergleichung und Reform. In I. K. H. G. Renner (Ed.), *Staatsangehörigkeitsrecht*. München: C.H. Beck Verlag, pp. 107-186.
- Herbert, Ulrich (2003). Geschichte der Ausländerpolitik in Deutschland. Saisonarbeiter, Zwangsarbeiter, Gastarbeiter, Flüchtlinge (Schriftenreihe Band 410). München: Bundeszentrale für politische Bildung.
- Hokema, T. O. (2002). Mehrfache Staatsangehörigkeit: eine Betrachtung aus völkerrechtlicher und verfassungsrechtlicher Sicht; unter Berücksichtigung des Staatsangehörigkeitsreformgesetzes vom 15. Juli 1999 (Vol. 97). Frankfurt: Peter Lang.
- Renner, G. (2003). Neuere Entwicklungen im Staatsangehörigkeitsrecht. Texte und Erläuterungen. Juni 2003.: <http://www.jura.uni-marburg.de/oeffr/renner/dokumente/ws0304/SkriptStAngR2003.doc> vom 08.08.2003.
- Nicklas, H. (1996). Die Nation im Kopf. Zur Sozialpsychologie der Nationalität. In A. Thomas (Ed.), *Psychologie der multikulturellen Gesellschaft*. (Vol. 2. Auflage, pp. 76-82). Göttingen: Verlag für Angewandte Psychologie.
- Schröter, Y.; Mengelkamp, C. & Jäger, R.S. (Eds.) (2005). Doppelte Staatsbürgerschaft – ein gesellschaftlicher Kurs über Mehrstaatigkeit. Landau: Verlag Empirische Pädagogik.
- Spiegel Online (2005a). Tausende von Türken droht Verlust deutscher Staatsbürgerschaft. Spiegel Online, 07.02.2005, www.spiegel.de/politik/deutschland/0,1518,340633,00.html vom 12.09.2005.
- Spiegel Online (2005b). Schily streitet mit Ankara über türkischen Doppelpass. Spiegel Online, 11.04.2005, www.spiegel.de/politik/deutschland/0,1518,350831,00.html vom 12.09.2005.
- Sturm, F., & Sturm, G. (2001). *Das deutsche Staatsangehörigkeitsrecht. Grundriß und Quellen*. Frankfurt am Main: Verlag für Standesamtwesen GmbH.
- Sen, F. & Sauer, M. & Holm D. (2001). Integratives Verhalten und (Selbst-)Ethisierung von türkischen Zuwanderern. Gutachten für die Unabhängige Kommission Zuwanderung. Münster: Zentrum für Türkeistudien.
- Wiedemann, M. (2002). Die Rechtstellung mehrfacher Staatsangehöriger in der Bundesrepublik Deutschland. 16. Migrationspolitische Forum. Erfahrungen mit dem neuen Staatsangehörigkeitsrecht und Rechtstellung doppelter Staatsangehöriger. Berlin, 7.10.2002.