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DUAL CITIZENSHIP POLICY IN SUB-SAHARAN AFRICA: A COMPARATIVE ANALYSIS OF NIGERIA AND ANGOLA

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DUAL CITIZENSHIP

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DUAL CITIZENSHIP POLICY IN SUB-SAHARAN AFRICA: A COMPARATIVE ANALYSIS OF NIGERIA AND ANGOLA

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ABSTRACT

In recent decades, recognition of dual citizenship has been one of the ways countries have sought to maintain ties with emigrants and immigrants. Sub-Saharan African countries, which are mainly countries of emigration, have been a part of this trend, however not all of them. This research paper investigates the cases of Nigeria and Angola, two dissimilar countries in the region that have both recognized dual citizenship, to discover reasons that fueled the policy. It finds out that the political dynamic of a democratic transition is an underlying factor that led to the acceptance of dual citizenship in both countries.

**KEYWORDS: DUAL CITIZENSHIP SUB-SAHARAN AFRICA EMIGRATION
DEMOCRATIZATION POLICY ADOPTION**

1. INTRODUCTION

Since the early 1990s, governments in Sub-Saharan African countries have been battling with ways to keep ties with the growing diaspora community. Some countries which include Senegal, Mali, and Benin, have established special administrative units to deal with the affairs of emigrants; others such as South Africa have implemented external voting by enfranchising citizens abroad (Whitaker 2011). One striking dimension to diaspora policies has however been the adoption of dual citizenship laws. After deciding to ban dual citizenship at independence in the 1960s and 1970s, most Sub-Saharan African countries now permit their diaspora population to accept new citizenship while retaining that of their home country (Manby 2016). Others notably Tanzania, the Democratic Republic of Congo, Malawi, and Zambia, have rejected the idea of dual citizenship to nationals living abroad (Manby 2016).

Why have some Sub-Saharan African countries accepted dual citizenship laws and others have not? There is a general common-sense belief that the adoption of dual citizenship is driven by the economic need to foster remittances and investments from the diaspora. Another interesting perspective, however, has been the securitization of citizenship policies i.e., the question of if a person can be loyal to more than one country at a time. As highlighted by Whitaker (2011), these conventional notions however completely ignore the political and contextual factors that motivate governments to adopt dual citizenship laws as in the case of Nigeria and Angola. As we would explore in this paper, there are more underlying factors that push Sub-Saharan African countries to recognize dual citizenship.

This paper specifically seeks to compare the cases of Nigeria and Angola to explain why some Sub-Saharan African countries allow emigrants to obtain another citizenship. Nigeria and Angola serve as interesting cases to compare because they are quite dissimilar countries in the Sub-Saharan African context but have a similar dual citizenship policy outcome. The methodology to be used is a controlled comparison of dissimilar case designs, and the dependent variable to be examined is the adoption of dual citizenship policy. The following section of this paper examines previous explanations and literature on dual citizenship. It then goes further to demonstrate how dissimilar Nigeria and Angola are particularly within the migration discussion. Subsequently, it explores the individual cases of these countries from a historical perspective and discovers that the transition to democracy (democratization process) is a driving factor for Sub-Saharan African governments to permit dual citizenships.

2. WHAT HAVE OTHERS SAID ABOUT DUAL CITIZENSHIP?

There is an increasing number of academic works on dual citizenship due to the growing number of countries adopting the policy in recent decades. Some researchers have tried to explain it using a global framework. Sejersen (2008) explains dual citizenship as an inevitable phenomenon because the increasing rate of migration and globalization has made it possible for many people around the world to have multiple nationalities at birth. Also, with the general acceptance of

gender equality across the world, children are now able to claim the nationality of their mothers. Therefore, as more people emigrate and become eligible for dual citizenship, countries become pressurized to adopt the policy (Sejersen 2008). For Howard (2005), the recognition of fundamental human rights and the decrease in disputes among countries have led to more acceptance of dual citizenship. Nationality has become less significant due to the application of human rights to both nationals and non-nationals.

Some other researchers have looked at the difference in dual-citizenship policies from a regional context to explain why some governments have adopted such policies and others have not. This regional outlook shows the variations in the motive of emigration (sending) countries and immigration (receiving) countries. Faist/Gerdes/Rieple (2004) compared 3 receiving countries: Netherlands, Sweden, and Germany, and found out that dual citizenship laws are due to multicultural and inclusive policies to help immigrants integrate properly. This inclusive notion of citizenship is represented by the *jus soli* (nationality based upon birthplace) principle as opposed to the *jus sanguinis* (nationality based upon blood or kinship) principle. Netherlands and Germany prohibit dual citizenship, while Sweden, on the other hand, accepts it. They also explain that dual citizenship policy is path-dependent, in the sense that previous laws on gender equality and human rights make it difficult to not adopt it (Faist/Gerdes/Rieple 2004).

Immigrant integration plays a role in debates about dual citizenship laws. As Whitaker (2011) explains, proponents argue that recognition of dual citizenship enables immigrants to integrate better because they can obtain new citizenship without giving up that of their home countries. Opponents, however, argue that it makes their focus and loyalty divided. Cain/Doherty (2006) carried out an empirical study which found out that dual citizenship increases the social and economic integration of immigrants, however, they are politically less involved than those with a single nationality. Ramakrishnan (2005) in another empirical study found out that dual nationals are equally or more likely to vote compared to single nationals. Due to national security implications when non-integrated immigrants are recruited by terrorist organizations, dual citizenship debates in receiving countries are thus focused on the extent to which immigrants can and should be integrated (Renshon 2005).

On the other hand, conversations about dual citizenship in emigration countries are usually about sustaining ties with the diaspora population. From the government's perspective, it is often seen as a way of maintaining an economic connection with emigrants. Still from a regional lens, Jones-Correa (2001) tried to explain dual citizenship policies in Latin America. According to him, emigration countries in the region follow either a top-down approach or a bottom-up approach towards dual citizenship. The difference between both is that the bottom-up approach relies on pressure and lobbying from diaspora groups seeking to turn their economic power into political power. This was exemplified by emigrants from the Dominican Republic, Colombia, and Ecuador, who forced concessions from their politicians when they tried to raise funds during political campaigns in their host communities (Jones-Correa 2001). Escobar (2007) further builds on this to explain how the rise of right-wing anti-immigrant narratives in the United States acted as a push factor for the adoption of dual citizenship laws in Latin America. She argues that sending countries

wanted to protect emigrants by ensuring they do not lose their citizenship rights at home, and so they had to adopt dual-citizenship policies (Escobar 2007).

Beyond the distinction between receiving and sending countries, Dahlin/Hironaka (2008) carried out quantitative analysis on factors that result in dual citizenship policy. Using a dataset of 102 countries across the different continents, they find little evidence that countries with a higher foreign-born population face more pressure to accept dual citizenship. On the contrary, they argue that cultural identity is a more important factor than the demography of the country. They discover that countries with ex-colonies, assimilative citizenship laws, and those that belong to many international organizations are more likely to adopt dual citizenship (Dahlin/Hironaka 2008). They also find out that countries with a colonial history are more likely to adopt the policy. Whitaker (2011) further explored this explanation of colonial history. Although European powers left distinct legal codes that may have influenced citizenship policies of their ex-colonies, she finds no consistent pattern in the data. The ex-French colonies are almost as likely to ban dual citizenship (10 countries) as they are to allow it (11 countries); this is also same for ex-British colonies (7 vs. 9) (Whitaker 2011). The former colonies of Belgium, Spain, and Italy are also not consistent in their citizenship policies. Whitaker (2011), however, interestingly finds that all five Portuguese colonies in Africa allow dual citizenship. This may reflect Portugal's history as a sending country that allowed dual citizenship for its emigrants (Howard, 2005), but the same is true for Italy, Spain, and even the United Kingdom (Whitaker 2011) and so that is still not a consistent explanation.

Looking at Africa and specifically Sub-Saharan Africa, Whitaker (2011) compared dual citizenship policy adoption in 3 Sub-Saharan African countries: Kenya, Senegal, and Ghana. She found out that factors such as political liberalization, perceived political leanings of the diaspora community and financial or electoral support from emigrants played a huge role in the adoption of dual-citizenship laws in these countries. It is nonetheless important to understand the limitation of these studies by studying other Sub-Saharan African countries to see if similar factors can be said to apply. This would help in expanding our empirical knowledge on why countries adopt the dual citizenship policy.

3. HOW DISSIMILAR ARE NIGERIA AND ANGOLA IN THE SUB-SAHARAN AFRICAN CONTEXT?

Nigeria and Angola are justified cases for this comparative study because they both have the same outcome (adoption of dual citizenship), even though they are different countries within the context of the region. As we examine in this section, this difference is evident in the differences in the colonial history, population size, economic size, immigrant and expatriate populations, and forms of democratic transition between the two countries. For our controlled comparison to make sense, it is important to show how dissimilar Nigeria and Angola are, particularly at the time dual citizenship policy was adopted in both countries. For the sake of the argument, Nigeria adopted the dual citizenship policy during the transition to democracy in the year 1999 after years of military dictatorship (Manby/Mohmoh 2020). Angola, on the other hand, adopted the policy in the year 1991 during the transition to democracy after years of a violent civil war (Jeronimo 2019). Angola was colonized by the Portuguese from 1575 until 1975 (Ball/Gastrow 2019). Nigeria on the other

hand was colonized by the British in 1800 and officially gained independence in 1960 (Iweriebor 1982). Nigeria thus became an independent state 15 years before Angola did. Nigeria is further located in West Africa and has a relatively larger population which has grown from 95.212 million people in 1990 to 206.139 million people in 2020 (World Bank 2020a). Angola on the other hand is a Southern African country with a population almost 9 times smaller than Nigeria’s, which grew from 11.848 million people in 1990 to 32.866 in 2020 (World Bank 2020a). Figure 1 below shows the population trend in both countries over the years.

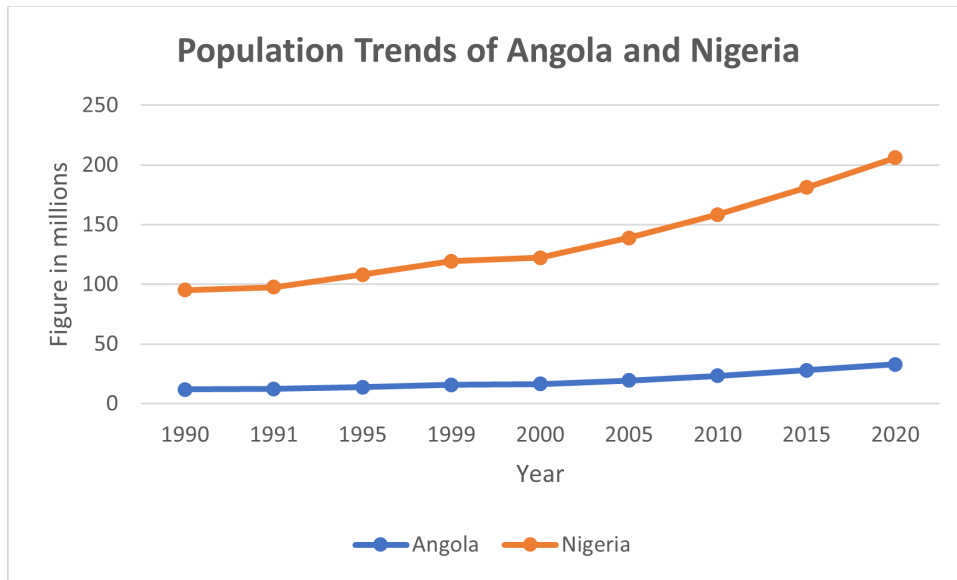


Figure 1: Population trends of both countries. Source: Author’s compilation from World Bank (2020a; 2020b)

In terms of the immigrant stock of both countries, Nigeria has had a larger share of immigrants in absolute numbers including refugees and labor immigrants from neighboring countries such as Niger and Benin (IOM 2020a). The total number of immigrants in Nigeria rose from 456.6 thousand people in 1990 to 1.3 million people in 2020. On the other hand, the total number of immigrants in Angola only rose from 33.5 thousand people in 1990 to 656.4 thousand people (IOM 2020b). This data is presented in figure 2 below.

There is also a large difference in terms of the emigrant population of both countries. Since the end of the Angolan civil war in 2002 – which forced many Angolans to flee into neighboring countries – the number of Angolans in the diaspora has stabilized. The number of Angolans in the diaspora reduced from 825 thousand people in 1990 to 668 thousand people in 2020 (IOM, 2020b). The emigrant stock of Nigeria on the other hand has consistently increased over the years from

447 thousand people in 1990 to 1.7 million people in 2020 (IOM, 2020a). This data is depicted in figure 3 below.

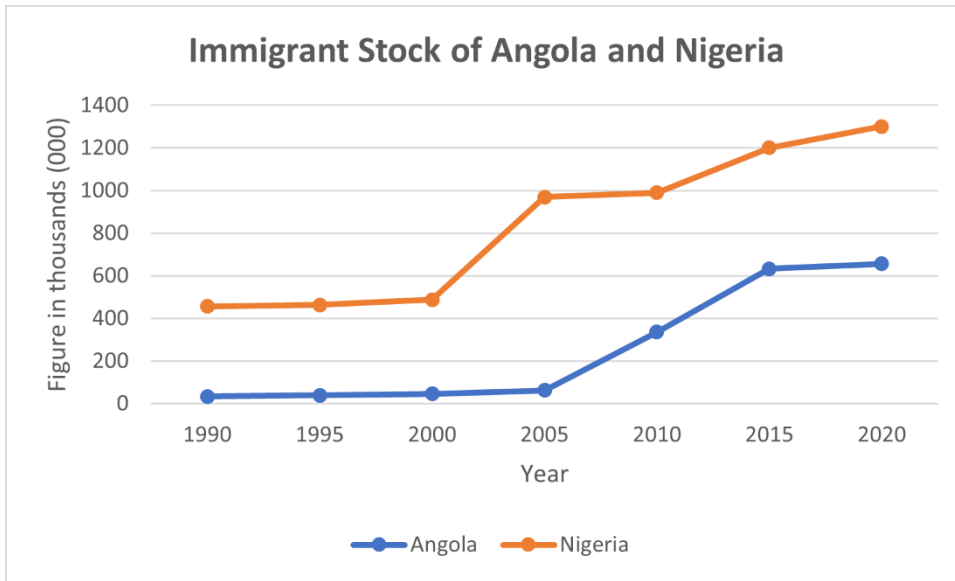


Figure 2: Immigrant Stock of both countries. Source: Author’s compilation from IOM (2020a; 2020b)

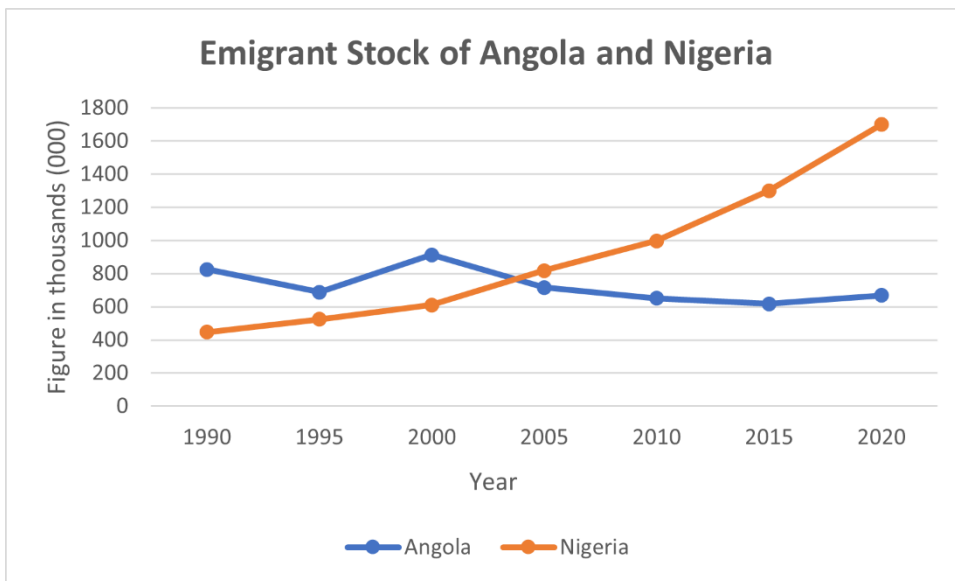


Figure 3: Emigrant Stock of both countries. Source: Author’s compilation from IOM (2020a; 2020b)

To buttress the difference between both countries, it is also important to look at their economic size. Both countries have witnessed economic growth over the years: the Angolan economy has grown from 11 billion dollars in 1990 to 62 billion US dollars in 2020 (World Bank 2020b). The

Nigerian economy contrastingly grew from 54 billion US dollars in 1990 to 432 billion US dollars in 2020 (World Bank 2020). This data can be seen in figure 4 below.

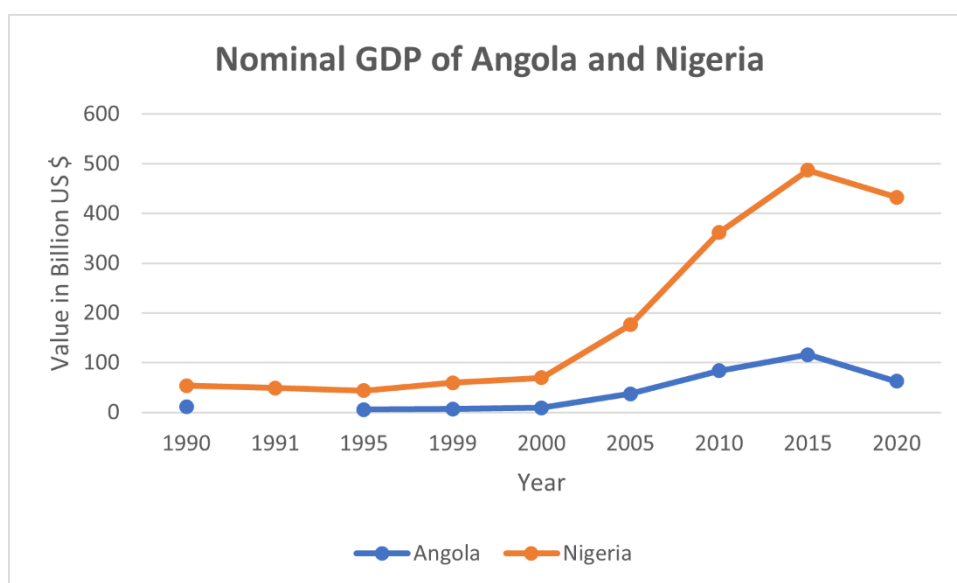


Figure 4: Nominal GDP of both countries. Source: Author’s compilation from World Bank (2020b)

Due to the heightened tension from the Angolan civil war in 1991, there is no official data from the World Bank on the nominal GDP for that year. Nonetheless, the value from the previous and subsequent years can give one a rough estimate. Also, it would have been interesting to compare how much remittances both countries received in the years building to the policy, however, there are no official data on remittances in the 90s. For an improved contrasting perspective, the differences between both countries when the dual citizenship policy was adopted – as demonstrated in this section – can be reviewed in table 1.

VARIABLE	NIGERIA (1999)	ANGOLA (1991)
Region	West Africa	Southern Africa
Colonial leaders	Britain	Portugal
Year of Independence	1960	1975
Population	119,260,055	12,248,901
Immigrant Stock	487,900	33,500
Emigrant Stock	610,000	824,900
Nominal GDP	59 billion US dollars	11 billion US dollars
Regime type	Transition to Democracy (after a violent war)	Transition to Democracy (after a military dictatorship)

Table 1: Dissimilarities between Nigeria and Angola when both countries adopted dual citizenship laws

Having examined the differences between Nigeria and Angola, the question remains: Why do countries that are this dissimilar in many aspects adopt a similar policy of dual citizenship? To answer this, we would have to look at the citizenship policies of both countries since independence and examine changes in the political landscape that may have influenced the decision to allow emigrants to take up a second nationality.

This paper argues that the acceptance of dual citizenship in both countries was fueled by the process of transitioning to democracy. Although there is some quantitative evidence that democratic countries in Africa are more likely to allow dual citizenship than authoritarian ones (Whitaker 2011), the impact of democratic transitions has not gained enough attention in the literature on dual citizenship. The process of transitioning to democracy has many implications which significantly influences the decision to adopt dual citizenship. The switch from a one-party regime after a civil war (as in the case of Angola) or a repressive military regime (as in the case of Nigeria) to a multi-party democracy comes with the need to end violence and form new political institutions that would respect individual rights. This fresh start is achieved through developing a new constitution that brings together all relevant stakeholders – including emigrants – and ensures everyone is carried along in the process. The transition to a multi-party democracy also comes with the need for political parties to appeal to new voter base and creates a dynamic of party politics.

4. EVOLUTION OF NATIONALITY LAW IN NIGERIA

The adoption of dual citizenship policy in Nigeria in 1999 is said to have taken place within the broader framework of democratization or political liberalization. To better understand this, it is important to look at citizenship policies in Nigeria from the historical and political context. At independence on 1 October 1960, the transitional provisions for the acquisition of Nigerian citizenship followed the standard template for the Commonwealth countries, negotiated with Britain. Citizenship was granted to those born in the territory before independence who were ‘British protected persons’ or ‘citizens of the UK and colonies’, however dual citizenship was prohibited and so these persons had to decide to be either Nigerian or British (Manby/Mohmoh 2020).

The 1960 independence constitution was replaced in 1963 to create a republic, but this did not change Nigeria’s citizenship policies. The citizenship policies were also unaffected by the suspension of parts of the constitution following a military coup that overthrew the civilian government in 1966, which directly or indirectly led to the Biafran civil war of 1967- 1970 (Manby/Mohmoh 2020). In 1974, a decree adopted by the military government in office replaced chapter II of the constitution and repealed the Citizenship Act of 1960. The new chapter repealed the constitutional provisions providing for the automatic acquisition of citizenship by birth. This

meant that a person born in Nigeria after independence would now only acquire citizenship at birth if one parent or grandparent was also born in the country, nonetheless, dual citizenship was still prohibited (Manby/Mohmoh 2020). Military rule under different authoritarian leaders continued from 1966 until 1979 following the adoption of a new constitution. The new 1979 Constitution changed the framework for citizenship acquisition. It created an ethnic dimension to citizenship and moved towards a citizenship rule based on descent but still retained the ban on dual citizenship (Manby/Mohmoh 2020).

The government of 1979 was eventually overthrown by another coup in 1983, which led to another period of different repressive military regimes until a long-promised return to civilian rule was finally achieved in 1999, and elections held under a new constitution, which remains in force (Manby/Mohmoh 2020). The 1999 constitution officially removed the ban on dual citizenship and maintained other citizenship provisions of the 1979 constitution (Manby/Mohmoh 2020). The 1999 constitution was signed into law by Gen. Abdulsalam Abubakar who took over as Head of State in 1998, following the death of Gen. Sani Abacha, who many describe as the worst military dictator in Nigeria's history (Egwaikhide/Isumonah 2001; Kraxberger 2004). Gen. Abubakar led a transitional government that oversaw the development of a new constitution and held democratic elections within one year.

5. EVOLUTION OF NATIONALITY LAW IN ANGOLA

Dual citizenship law in Angola is also said to have been adopted in 1991 within the broader structure of a transition from one-party regime to multi-party elections. In general, citizenship laws in Angola during colonial times reflected the European perception of citizenship as attached to the state system, with no consideration of pre-colonial Angolan culture (Manby 2018). During the independence struggle, the three liberation movements – *Frente Nacional de Libertação de Angola (FNLA)*, *Movimento Popular de Libertação de Angola (MPLA)*, and *União Nacional para a Independência Total de Angola (UNITA)* – conflicted with the adoption of a universalistic or tribalistic conceptualization of nation-building (Martins 2017; Pereira 2002), and this clash was carried on into the civil war that emerged in the country post-independence. The MPLA movement, which eventually won with the support of Cuba and the Soviet Union, aligned with a universalistic approach, and retained the state-centered European model of citizenship at independence in 1975. The 1975 Nationality Act adopted by the MPLA, combined *jus soli* and *jus sanguinis*, with a clear preference for the former, and insinuated a ban on dual citizenship (Jeronimo 2019).

With the civil war still raging, but already under the leadership of José Eduardo dos Santos (who succeeded Agostinho Neto as head of the MPLA and President of the Popular Republic of Angola), a new Nationality Act was adopted in 1984. This new law provided a more elaborate legal

framework and made the ban on dual citizenship more explicit. It also shifted the balance between *jus soli* and *jus sanguinis* in favor of the latter, while introducing specific safeguards against statelessness (Jeronimo 2019). This citizenship regime was developed against a background of civil war which hampered its implementation, with rising ethnic tensions and millions of people displaced or exiled. The war destroyed the country's infrastructures which collapsed the state administrative system, including the registration of births, the maintenance of records, and the issuance of identity documents (Jeronimo 2019). The conflict was expressed as a cold war proxy: the MPLA espoused socialism and was backed by both the Soviet Union and Cuba, while UNITA took an anti-communist line, winning support from the United States and South Africa (Fortna, 2003).

A ceasefire to the civil war was agreed in May 1991, with both fighting factions – MPLA and UNITA – signing the Bicesse Peace Accords under the auspices of the United Nations, with the Portuguese Government as a mediator and in the presence of observers from the Governments of the United States and the Soviet Union (Jeronimo 2019). The fundamental principles of the Bicesse Peace Accords were the creation of multi-party democracy in Angola in which UNITA would have the right to 'conduct and freely participate in political activities; the revision of the Constitution and the electoral laws after consultation with all political forces; the organization of free and fair elections for a new government, following voter registration conducted under the supervision of international elections observers, who were to remain in Angola until they certified that the elections had been free and fair and that the results had been officially announced; and respect for human rights and basic freedoms, including the right of free association (Jeronimo 2019). By the time the Accords were formally signed, the Constitution had been significantly subject to drastic revisions which radically changed the identity of Angola's constitutional order (Gouveia 2017). As part of the constitutional change, a new Nationality Act was adopted which removed the ban on dual citizenship and introduced judicial oversight of the decisions taken by the Government in matters of citizenship (Jeronimo 2019).

6. COMPARATIVE ANALYSIS OF THE NIGERIAN AND ANGOLAN CASES

As shown in the previous section, the argument on colonial legacy does not hold true, as both countries prohibited dual citizenship upon independence even though their colonial masters, the United Kingdom and Portugal, were historically sending countries that allowed dual citizenship for emigrants. On the contrary, the acceptance of dual citizenship in both countries was fueled by the

process of transition to democracy. Both country cases show the different facets of the democratization process which led to the acceptance of the policy.

Transitioning to democracy after a civil war (in the case of Angola) and a brutal dictatorship (in the case of Nigeria) created the need to close the book on past violence and oppression, as well as forge a new narrative for the countries. Both countries have had a long history of oppression or violence that had directly forced people out of the country. Human Rights Watch (1998) documents some of the atrocities committed by the 5-year Abacha military regime in Nigeria which include: extrajudicial executions of democratic figures, arbitrary detention, harassment of democratic figures, undermining courts, and undermining the rule of law, etc. In contrast, the state of Angola has also been engulfed in a civil war since independence in 1975 which resulted in thousands of deaths and displacements. The US Department of Justice (2003) estimates the number of deaths in 1991 to be over 200,000 people, while the number of displacements was above 400,000. The democratization process spurred a desire to end the scars of violence, pacify those who fled, and foster a new chapter in both countries.

Beyond the need for a fresh start, transitioning to democracy also necessitates the idea of inclusion i.e., carrying everyone along. In both countries, emigrant populations were at the highest levels at the time. In Nigeria, emigrants had increased to close to half a million people many of whom were exiled activists who championed advocacy towards democracy from abroad (Falode 2016). They formed associations such as the National Democratic Coalition (NADECO) and National Liberation Council of Nigeria (NALICON) and held conferences abroad actively pushing for a democratic transition. In Angola, on the other hand, over 33,000 people were emigrants at the time, most of whom were refugees in neighboring countries such as the Democratic Republic of Congo, Namibia, and Zambia. As Dahl (1971) noted, democracy essentially involves the continued responsiveness of the government to the preferences of the people. A democratic process, therefore, had to consider the interest of such a significant number of people.

The transition to democracy also creates a dynamic of party politics which makes dual citizenship politically desirable. Political parties that were to contest elections in both countries at the time did not oppose dual citizenship. This could be because they saw the diaspora community as a potentially useful economic and political base of influence in a democratic setting. Norris (2004) buttressed this by demonstrating how the reforming of formal rules can alter the political behavior at the mass and elite level. This was particularly evident in Nigeria, when the newly elected Nigerian President, Olusegun Obasanjo, made several foreign trips during which he held discussions with Nigerians in the Diaspora (Sharkdam et.al. 2014). The discussions focused on maximizing human and financial resources from the diaspora community towards the country's development. He eventually established the Nigerians in the Diaspora Organization (NIDO)

Worldwide which consists of a local branch at the Ministry of Foreign Affairs and international branches in Nigerian embassies across the world, and he gained massive support from the diaspora during his reelection in 2003 (Akinrinade/Oken 2011). In the case of Angola, the peace process was short-lived with the resumption of war shortly after the election result was announced, and so it is hard to verify if political parties were motivated by the potential economic and political influence of the diaspora.

7. CONCLUSION

This paper has attempted to study some of the reasons Sub-Saharan African governments permit their citizens to take up a second nationality through the lenses of Nigeria and Angola. In the end, it found out that dual citizenship policy is fueled by the process of a democratic transition at the intersection of politics. While this finding is interesting, it is, however, important to note its limitations. The connection between the democratization process and dual citizenship is not generalizable across the region. Countries such as Chad and Gabon adopted dual-citizenship laws at independence (Manby 2016), while countries such as Tanzania and the Democratic Republic of Congo that has since democratized, are yet to accept it, although there are debates about it in the ongoing process of political liberalization in these countries. Beyond Sub-Saharan Africa, many South American countries including Colombia, Ecuador, Brazil, etc., began to accept dual citizenship after the 1980s wave of democratization in the region (Whitaker 2011). Furthermore, this paper only considered the adoption of dual citizenship laws and did not examine some of the restrictions dual nationals may face in their countries of origin. Although this does not apply to the cases of Nigeria and Angola, some countries such as Kenya, Ghana, and Uganda, have regulations prohibiting dual nationals from holding a range of public offices (Manby 2016).

Beyond its limitations, this research has added to the literature on dual citizenship by exploring the link between a democratic transition and dual citizenship. While many other researchers focus on remittances, investments, and other economic relevance of the Sub-Saharan African diaspora, this paper nudges us not to ignore the political context within which these benefits were established.

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