



Department of Political Science

Chair Comparative Constitutional Law

**A COMPARATIVE ANALYSIS OF
THE MODELS AND MODES OF CITIZENSHIP
IN FRANCE, GERMANY, ITALY, AND THE UNITED KINGDOM**

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ABSTRACT

In the last thirty years, national citizenship laws have been reformed in many European States taking into consideration the permanent phenomenon of immigration and the creation of the additional citizenship of the European Union (EU) for citizens of its Member States. Actually, Italy has not yet carried out a comprehensive reform of its citizenship law (Act no. 91 of 1992), but is discussing it in the current XVII legislature. In this context, a comparative analysis of citizenship laws of some European States may be a good starting point to examine the possible changes of this Italian reform. The ratio behind this study is that, despite different historical backgrounds, European States have faced similar issues concerning citizenship, in particular regarding the integration of immigrants in their societies. Indeed, citizenship has been considered over time both as a means to and as an end of integration of immigrants by those States which have acknowledged the fact that they have become immigration countries. As a consequence, the normative experience of other States may be an example either to emulate or to avoid. Although emulation of other citizenship laws is unlikely to occur because they are rooted in States' history, it is undeniable that recently some convergences have taken place in Europe. Thus, this dissertation aims at providing a detailed comparative study of the models and modes of citizenship in four key European States, specifically France, Germany, Italy, and the United Kingdom (UK), in order to analyse both the convergent trends in Europe and the attempt of reform of Italian citizenship law.

In particular, States have the exclusive competence to determine who is a citizen at birth and how someone becomes a citizen after birth by choosing the modes of acquisition of citizenship. This State's prerogative stems from the fact that citizenship represents the relationship between the individual and the State since the birth of the State itself. As a matter of law, citizenship is both the legal *status* of being a citizen and the source of rights and obligations of citizens. As a result, States distinguish between citizens and non-citizens in their territories, excluding automatically the latter from participation in their societies. In recent times, this dichotomy has collided with increasing cross-border migration and the freedom of movement in the European Economic Area (EEA). Nevertheless, citizenship is not a static concept and, consequently, States have changed their own citizenship laws over time on the basis of historical circumstances and their national imprinting. Taking into account the above points, some questions related to citizenship arise. First of all, what are the main models and modes of citizenship used by States? Secondly, how have citizenship laws of France, Germany, Italy, and the UK evolved up to day? What is the ratio behind the *criteria* adopted by these States for the determination of who is a citizen at birth and who is a citizen after birth? Thirdly, is it possible to deduce the existence of convergent trends concerning citizenship from country analyses? If a process of convergence exists, what are the main trends in Europe? Are they leading towards a common pattern for modes of acquisition of citizenship? Finally, is it possible to find elements of these European convergences in some Italian bills regarding the reform of Act 91 of 1992? All these concerns have been addressed in this dissertation through a comparative study which follows four country analyses.

The comparative analysis aimed at understanding how citizenship laws of France, Germany, Italy, and the United Kingdom (UK) have been changed over time in the wake of not only the peculiar historical circumstances occurred in these States up to date, but also the existence of increasing cross-border migration and the integration process in the European Union (EU). In general, all these States have started to reform their citizenship laws in similar ways when they have

acknowledged the fact they have become immigration countries, by using citizenship as both a means to and an end of integration of immigrants. Except Italy that is trying to reform its citizenship law nowadays, the other States have introduced both liberalising and restrictive measures in their citizenship laws, by producing a mixed effect of their reforms. Indeed, liberalisation of citizenship laws has occurred thanks to the perception of citizenship as an instrument to achieve integration, while restrictive measures have been the result of the perception of citizenship as an identity *status* that can be acquired or granted only when basic integration of immigrants has already occurred. This situation is emblematic of the fact that some convergences concerning citizenship do exist in Europe, but that this process of convergence does not entail the existence of a common pattern of modes of acquisition of citizenship. In fact, there is still diversity between States' citizenship laws because they are closely related to the peculiar history of each State and belong to the exclusive competence of the State. Thus, the comparative study has resulted fundamental to assess that convergent trends on citizenship do exist in Europe and that even the analysed bills presented during the XVII Italian legislature include elements of these trends, such as the introduction of *ius soli* at birth to allow the full integration of the second- and third generations of immigrants as well as the introduction of language and integration requirements in naturalisation procedures for acquisition of citizenship by the first generation of immigrants.

In order to support the above mentioned argument, this dissertation has been articulated into three parts: the first part has described the concept of citizenship in general terms; the second part has focused on four country analyses, specifically the evolution and the current modes of acquisition of citizenship in France, Germany, Italy, and the UK; and the last part has evidenced convergences in Europe and has analysed the Italian reform of citizenship law in the light of these convergent trends. With the purpose of highlighting most relevant aspects of this dissertation, I will briefly recap the contents of these three parts.

First of all, the concept of citizenship has been examined in order to provide a broad understanding of the topic by looking at the definition of citizenship, its main meanings in the history, the development of citizenship as a national institution, and the terminological difference between the terms “citizenship” and “nationality”. More precisely, a comprehensive definition of citizenship does not exist for two reasons: on one hand, citizenship is a juridical, sociological, philosophic, and political concept, which is therefore subject to several interpretative traditions; on the other hand, the meaning of citizenship has varied over time following the changes of the relationship between the individual and the political community/State. In addition, not only historical events, but also the “national imprinting”, i.e. the traditional understanding of nationhood, must be taken into consideration because both history and tradition are components of the State’s heritage, which in turn affects the evolution of citizenship laws. In fact, the relationship between the individual and the State is at the core of the juridical concept of citizenship which can be defined as the legal *status* of citizens and, consequently, as the source of their rights and obligations. Overall, citizenship is not a static concept and, consequently, it has assumed two main meanings: “membership”, i.e. State-membership on the basis of a common tradition and culture (representing a vertical bond between the individual and the State), and “participation”, i.e. participatory membership due to the participation in the activities of the political community (representing a horizontal bond among people of the political community). Moreover, in ancient times, citizenship meant mainly participation with some differences: whereas in Athens it was a political *status*, in Rome it developed as a legal *status* carrying with it rights and obligations. This last meaning has lasted up to date. However, in modern times, citizenship has become a national institution through the birth of the nation-States which promoted a citizenship-membership based on nationality, after a period in which absolute States had reduced citizenship to the meaning of subjection. Indeed, in the modern liberal States citizenship as “membership” and as “participation” coexisted through the nationality principle, and since the XIX century each State has developed its own nationality law.

What follows is a classification of the models and modes of acquisition of citizenship. Briefly, it is useful to remember that there are two citizenship models: one is based on *ius sanguinis* (the descent principle) and the other is based on *ius soli* (the territoriality principle). Differently, the modes of citizenship are multiple and vary from one State to another. They can be distinguished as modes of acquisition of citizenship at birth (see table 1 below) and modes of acquisition of citizenship after birth (see table 2 below) for a total of twenty-seven modes in the classification made by the EUDO Observatory on Citizenship. The former are *ius sanguinis* at birth and *ius soli* at birth, whilst the latter have been divided into five categories, specifically birthright-based modes, residence-based modes and naturalisation, family relation-based modes, affinity-based modes, and residual modes.

Table 1: Typology of modes of acquisition of nationality at birth

Sub-group of modes (at birth)	ID	Details and target persons
<i>Ius sanguinis</i> at birth	A01	Acquisition by persons born to nationals of C1 A01a = Descent (born in C1) A01b = Descent (born abroad)
<i>Ius soli</i> at birth	A02	Acquisition by persons born in C1 (except those under mode A03) A02a = Birth in C1 (second generation) A02b = Birth in C1 (third generation)
	A03	Acquisition by persons who are foundlings and by persons born in C1 who would otherwise be stateless A03a = Foundling A03b = Born stateless

Legend: C1 = Country under consideration

Table 2: Typology of modes of acquisition of nationality after birth

Sub-group of modes (after birth)	ID	Details and target persons
Birthright-based modes	A04	<i>Ius sanguinis</i> after birth: acquisition by persons born to nationals of C1 whose descent is established by recognition or judicial establishment of maternity/paternity = Establishment of paternity
	A05	<i>Ius soli</i> after birth: acquisition by persons born (or assumed to have been born) in C1 = Birth in C1 (acquisition after birth)
Residence-based modes	A06	Residence-based acquisition by persons with a certain period of residence in C1 (without other special <i>status</i>) = Ordinary naturalisation
	A07	Socialization-based acquisition by persons raised (while minors) in C1 = Socialization-based acquisition
Family relation-based modes	A08	Transfer of nationality to spouses of s of C1 = Spousal transfer
	A09	Transfer of nationality to children of persons who are now, but were not nationals of C1 at the time of the child's birth, or whose nationality at that time is irrelevant = Filial transfer
	A10	Transfer of nationals to adopted children of nationals of C1 = Adoption
	A11	Transfer of nationality to other relatives of nationals of C1 = Transfer to other relatives
	A12	Transfer of nationality to relatives (spouse, child, grandchild) of former or deceased nationals of C1 = Transfer from former citizen
	A13	Extension of acquisition to spouses of foreign nationals who acquire nationality of C1 = Spousal extension
	A14	Extension of acquisition to children of foreign nationals who acquire nationality of C1 = Filial extension
	A15	Extension of acquisition to other relatives of foreign nationals who acquire nationality of C1 = Extension to other relatives
Affinity-based modes	A16	Reacquisition by former nationals of C1 = Reacquisition
	A17	Acquisition by special nationals with restricted citizenship = Restricted citizenship rights
	A18	Acquisition by persons with nationality of C2 = Citizenship of a specific country
	A19	Acquisition by persons with cultural affinity to C1 (ethnicity, mother tongue or religion) = Cultural affinity
	A20	Acquisition by persons who acted as nationals of C1 in good faith and/or were presumed C1's nationals for some time = Presumed citizens
	A21	Acquisition by persons with other special connections to C1 = Very long residence

Residual modes	A22	Acquisition by recognised refugees = Refugees
	A23	Acquisition by stateless persons or persons of unclear nationality = Stateless or unclear citizenship
	A24	Acquisition by persons with special achievements for C1 = Special achievements
	A25	Acquisition by persons in the public (military or non-military) service of C1 = Public service
	A26	Acquisition by persons with special financial assets and/or persons who invest money in C1 = Financial assets
	A27	Other modes of acquisition = Acquisition of citizenship for other reasons

Legend: C1 = Country under consideration; C2 = Particular foreign country for which special regulations apply, e.g. Member States of the European Union, Member States of other international organizations, Parties in bilateral or multilateral agreements.

Next, both the historical development of the citizenship laws and the current modes of acquisition of citizenship in France, Germany, Italy, and the UK have been deeply analysed. Indeed, each country analysis includes first an overview of the evolution of the State's citizenship law from its origins to recent developments along the elucidation of the rationale behind the measures adopted, and then a detail normative description of the current modes of acquisition of citizenship at birth and after birth.

The first country analysis is about France. Current French citizenship law (French Civil Code, Book I, Title I bis: On French Nationality, of 21 March 1804, as last amended by Law no. 2011-672 relating to immigration, integration and nationality of 16 June 2011), was established in 1889 because, in that year, *ius soli* was definitively institutionalised in the *ius sanguinis* French model following the necessity to progressively integrate immigrants and their descendants. Then, French citizenship law was also reviewed several times in the XX century due to concerns about loyalties of naturalised persons during the wars, human losses after the wars, decolonization, and gender equality. Finally, since the 1980s the politicization of citizenship has led to other reforms of French citizenship law. Overall, France has considered citizenship mainly as a means to integration of foreigners, but after politicization also as an end of integration. In fact, the main reasons behind

the continuous changes of French citizenship law were: first, ensuring that also foreigners living in France for a long period were obliged to public services, such as the military draft; second, solving demographic lacks after the two world wars; and third, dealing with the presence of many immigrants in France and, at the same time, guaranteeing the maintenance of French culture as well as the respect of the essential principles and values of the French Republic by naturalised citizens. Consequently, French citizenship is attributed at birth if at least one of the parents of the child is French (*ius sanguinis*), or if the child is born in France and has one parent who is also born in France (double *ius soli*). Otherwise, it is acquired after birth *ex lege*, by declaration, or by naturalisation as French, i.e. through the discretionary decision of the public authorities if the applicants meet all the conditions required.

The second country analysis regards Germany. Current German citizenship law (Nationality Act of 22 July 1913, as last amended by the Act to Implement the EU Directive on Highly Qualified Workers of 1 June 2012) can be considered so far the clearer example of a mixed model of citizenship developed through the introduction of *ius soli* elements in a traditional *ius sanguinis* country. Apart from some changes in the XX century made first by the Nazi regime, which exploited the principle of *ius sanguinis* to achieve racial discrimination, and then by the Federal Republic of Germany (FRG) in order to eliminate the discriminatory measures, the major modifications of the 1913 German Nationality Act occurred after the reunification of Germany (1990) because Germany had to face two main problems related to immigration: the increasing number of ‘ethnic Germans’ who did not speak German well and the need to integrate long-term immigrants coming to Germany due to its job opportunities and its generous asylum policy. As a consequence, in the 1990s citizenship was subject to instrumentalisation and politicization in Germany, and the 1999 reform (entered into force in 2000) was the result of an elite-driven process towards liberalising measures along the mobilization of xenophobia among the population by the opposition which aimed to fulfil restrictive measures. Finally, this reform provided for three major

changes: 1) the introduction of *ius soli*; 2) the establishment of the ‘optional model’, i.e. the renunciation of previous citizenship by persons acquiring German citizenship *iure soli* or by naturalisation; and 3) the facilitation of naturalisation procedures by reducing the residence period required from fifteen to eight years. Besides these liberalising measures which ease integration of immigrants in the country, some restrictive measures, such as the introduction of language and integration tests, have been adopted in the following years in order to ensure that naturalised Germans are able to integrate in the society thanks to the knowledge of the German language, of the legal system, and of the living conditions in Germany. In general, these changes of German citizenship law took place when it was evident that immigrants had set their permanent residence in Germany. The need to integrate these persons into the German society is the reason why the German Nationality Act provides for not only acquisition of citizenship *iure sanguinis*, but also acquisition of citizenship *iure soli* to children born in Germany if at least one parent meets the residence requirements, discretionary naturalisation (*Kann-Einbürgerung*) and entitlement to naturalisation (*Soll-Einbürgerung*) upon certain conditions.

The third country analysis concerns Italian citizenship law (Act no. 91 of 5 February 1992, as last amended by Act no. 94/2009 on public security) which is primarily based on family ties and a co-ethnic preference. The reasons behind this citizenship model come from the evolution of Italian citizenship law and in particular from the fact that Italy became a nation-State relatively late. Indeed, it was for a long time a nation in search of a State. Originally, citizenship was regulated by legislation of the Kingdom of Piedmont and Sardinia which promoted the unification of Italy and then by the 1865 Civil Code. However, the phenomenon of mass emigration in the early-XX century has marked the evolution of Italian citizenship law and the law of 1912 was the former articulated legislation of Italian citizenship. It reasserted *ius sanguinis* as the preeminent principle, inserted *ius soli* as a complementary principle, and facilitated reacquisition of Italian citizenship by emigrants. Despite some changes during fascism and after World War II, Italian citizenship law was

re-formulated in the Act 91 of 1992 which strengthened the *ius sanguinis* principle, definitively established a co-ethnic preference for foreigners of Italian descent and EU citizens in naturalisation procedures, made residual acquisition of citizenship *iure soli*, and made more difficult naturalisation of non-EU citizens by raising the residence requirement from five to ten years. Therefore, this act was obsolete since its inception because Italy was already a country of immigration in 1992, but continued to perceive itself still as an emigration country. As such, Italian citizenship law causes inconvenience to long-term foreign residents and their children (second generation of immigrants). This is why a reform of Act 91/92 is necessary. Nevertheless, many attempts of reform did not succeed because citizenship has become a contending political issue. Overall, Italian citizenship law is an example of path dependence: it depends on a model introduced in the past that has not been adapted to the new reality of Italy as an immigration country. As a result, *ius sanguinis* and co-ethnic preference continue to be the cornerstones of current Italian citizenship law.

The last country analysis focuses on the peculiar citizenship law of the UK (British Nationality Act of 30 October 1981, as last amended by Borders, Citizenship and Immigration Act of 21 July 2009). It is a complex legislation which contains both *ius soli* and *ius sanguinis* provisions since 1981. Actually, the UK was traditionally a *ius soli* country given that the territoriality principle was at the basis of subjecthood since medieval times and derived from the feudal concept of allegiance to the lord of the land in which the person concerned was born. Yet, the complexity of British citizenship law is mainly due to the dismantling of the former British Empire, in particular after World War II. Since then, the UK has tried to maintain a link with persons in new independent countries as well as those in Commonwealth countries through the *status* of British subject. This is why in 1948 several categories of people were created and among them only “Citizens of the United Kingdom and Colonies” (CUKCs) and “Citizens of the Independent Commonwealth Countries” (CICCs) had the right of entry the UK. Moreover, a more systematic control on immigration was made through the 1971 Immigration Act which distinguished between

patrials and *non-patrials*. Only the former had the right of entry the UK without control and the right of abode there. However, this classification was really confusing and in 1981 the conservative government adopted the British Nationality Act (entered into force in 1983) which still provides for six categories of citizenship: British Citizenship (BC), British Overseas Territories Citizenship (BOTC, but formerly named British Dependent territories Citizenship or BDTC), British Overseas Citizenship (BOC), British Subjects (BSs), British Protected Persons (BPPs), and British Nationals (Overseas) (BNO). In this dissertation, only modes of acquisition of British citizenship has been dealt with because it is the only one that entails the right of abode and entry in the UK as well as the right of free movement in the European Economic Area (EAA). In fact, the most significant changes since 1983 were: 1) the restriction of *ius soli* by adding a *ius sanguinis* element (at least one of the parent of the child is a British citizen or settled in the UK) in the acquisition of British citizenship at birth *iure soli*; 2) the limitation of acquisition by descent to first generation born abroad; and 3) introduction of the entitlement to registration as British citizens has to certain persons with a connection to the UK. In general, British citizenship law has become over time an instrument of immigration policy in order to limit the number of British in the world. Although there is not a clear logic behind the modes of acquisition of British citizenship, from an historical perspective British citizenship law has always been intertwined with rules on immigration and asylum. This is confirmed by the fact that in the political spectrum, both the Labour party and the Conservative party have favoured restrictive measures when in power. For example, the Labour government have adopted the 2002 Nationality, Immigration and Asylum Act which tightened naturalisation procedures by adding language and integration requirements. Even though acquisition by naturalisation has been made more difficult and expensive over time, British citizenship law remains one of the most liberal and inclusive citizenship laws on the European stage.

Lastly, the analyses of the citizenship laws of France, Germany, Italy, and the UK have been functional to highlight the existence of convergences on the European stage as well as the future

alignment of Italian citizenship law with the others studied in this dissertation. Despite the several differences between these States due to their heritage (i.e. their peculiar history and traditional model of citizenship), some common circumstances, above all permanent immigration, have led them to reform their citizenship laws. Consequently, six convergent trends can be noticed in Europe since 1980s: 1) the extension of *ius sanguinis* through equal treatment of men and women in citizenship matters (see table 3 below); 2) the development of mixed models of citizenship by adding *ius soli* in traditional *ius sanguinis* countries or *vice versa* (see table 4 below); 3) the increasing acceptance of multiple citizenship; 4) the introduction of language and integration requirements in naturalisation procedures (see table 5 below); 5) the avoidance of statelessness; and 6) the increasing relevance of EU citizenship through the preferential treatment of EU citizens in naturalisation procedures in some Member States as well as the limitations of Member States' exclusive legislative competence in citizenship matters after the 2010 *Rottmann* case law of the European Court of Justice (ECJ), which has ruled that the general principles of the EU must be observed by Member States in their citizenship laws.

Table 3: Transmission of citizenship *iure sanguinis a patre et a matre*

State	Year of introduction	Legal reference	Conditions for children born abroad
France	1945	18 Civil Code	_ (unrestricted transmission of citizenship)
Germany	1975	4(1); 4(4) Nationality Act	Second generation born abroad (if the German parent is also born abroad and resides there): acquisition of citizenship only through registration within 1 year after birth of the child (unless the child would otherwise become stateless)
Italy	1983	1(1a) Act 91/92	_ (unrestricted transmission of citizenship)
UK	1983	1(1a); 2; 3 British Nationality Act	First generation born abroad: automatic acquisition if a) the British parent is a citizen otherwise than by descent or b) is a British citizen working abroad in public service. Second generation born abroad: if the parent is not born in the UK (or if the child would otherwise become stateless), acquisition after registration within 1 year after birth of the child (further conditions under Art 3 must be fulfilled)

Table 4: Acquisition of citizenship *iure soli* at birth and after birth

State	<i>Ius soli</i> at birth			<i>Ius soli</i> after birth		
	Legal reference	Procedure	Conditions	Legal reference	Procedure	Conditions
France	19-3 Civil Code	Automatic	If one parent is born in France	21-7 Civil Code	Automatic	At age of 18: if 5 years of residence since age of 11
				21-11 Civil Code	Declaration (himself)	At age of 16-18: if 5 years of residence since age of 11
					Declaration (parents)	At age of 13: if 5 years of residence since age of 8
Germany	4(3) Nationality Act	Automatic	If one parent has habitual residence in Germany for 8 years and has permanent residence right; Renunciation of descent-based citizenship from 18-23 years old (Except EU citizens and Switzerland citizens)	–	–	–
Italy	–	–	–	4(2) Act 91/92	Declaration	At age of 18 within one year: if uninterrupted residence in Italy since birth
				9(1a) Act 91/92	Naturalisation	From age of 18: if 3 years of residence
UK	1(1b) British Nationality Act	Automatic	If one parent is a British citizen; or has permanent residence in the UK	1(3) British Nationality Act	Entitlement to registration	Before the age of 18: if one parent becomes a British citizen or settled in the UK
				1(4) British Nationality Act	Entitlement to registration	From age of 10: if residence in UK since birth (no more than 90 days of absence during each year)

Table 5: Material and procedural requirements in naturalisation procedures

State	Years of residence	Language	Integration / Knowledge about the country	Ceremony
France	5	Certificate B1 level (CEFR) (before 2012: interview)	Signature of charter of rights and duties of the French citizen (2012); Interview	Voluntary (2006)
Germany	8 (before 2000: 15)	Certificate B1 level (CEFR) (before 2007: interview)	Test: questions available online; 17 correct answers out of 33 questions (2008)	
Italy	10 for non-EU citizens (before 1992: 5); 4 for EU citizens (before 1992: 5); 3 persons of Italian descent (before 1992: 5); 5 for refugees and stateless persons.	–	–	–
UK	5	Certificate B1 level (CEFR) or an equivalent level qualification (before 28 October 2013: ESOL courses)	Life in the UK Test: a multiple choice test based on questions of an official handbook + questions available online (2002)	Compulsory (2002)

Among these trends, the development of mixed models of citizenship by introducing or extending *ius soli* elements in traditional *ius sanguinis* countries reflects the need to integrate immigrants in the society of the analysed States. Hence, they have used citizenship as a means to integration of second- and third generations of immigrants. Similarly, the introduction of language and integration requirements in naturalisation procedures is the measure chosen by States to ensure integration of first generation of immigrants through acquisition of citizenship by naturalisation, which is granted only if the applicants demonstrate that they are able to participate in the political community, knowing the official language, the history, and the political system of the State concerned as well as the social life of citizens within it. In this second case, citizenship is

considered more as an end of integration. Even though these liberalising and restrictive measures seem contrasting, they are two sides of the same coin. Therefore, the picture on citizenship that has emerged is still uncertain, but it is unquestionable that States are in search of an equilibrium between their heritage and the most recent phenomena, i.e. immigration and European integration. The reason why they are looking for this balance through modifications of their citizenship laws is to avoid exclusion of immigrants who are born and grown up in their territories (second- and third generations) as well as those who have lived there as long-term or permanent residents (first generation) and have shown their will and effort to integrate in order to become citizens.

In conclusion, similar considerations can be made also with respect to the reform of Italian citizenship law. The analysis of the bills presented during the current XVII legislature and presently before the House of Deputies has been made to detect whether the changes proposed are in line with the above mentioned convergences. Although the debate on the Italian reform is still ongoing, the introduction of acquisition of citizenship *iure soli* at birth seems to be a core concern. In fact, these bills provide empirical evidence of the mentioned trends, in particular with respect to three modes of acquisition of citizenship: 1) acquisition *iure soli* at birth, 2) acquisition *iure domicilii* and *iure culturae* by minors, and 3) acquisition by naturalisation. Italy is even the proof that only when a country starts to conceive itself as an immigration country, reforms of the citizenship laws are seriously taken into consideration. Like France, Germany, and the UK, Italy is adapting its citizenship law to current circumstances, in particular the permanent phenomenon of immigration. Thus, the time is ripe for reforming the obsolete Act 91 of 1992. Yet, it will be possible to assess the alignment of Italy with the other three States only when the Italian parliament will find an equilibrium between the heritage of Italy and the need of integration of immigrants in terms of citizenship acquisition, and consequently it will adopt the reform of its citizenship law.

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