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Becoming and Belonging? Lived experiences of naturalization and the implementation of citizenship law in Germany and Canada

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1 Introduction

It is a cold November night in Toronto, Canada, in 2022. A group of PhD students make their way downtown to a drag show. After queueing for a few minutes, we are asked to show our IDs. One after the other gets waved through until the last one of our group gets out her cell phone and pulls up a scan of her ID. 'That won't work', one of the doormen says straight away. Dana, with a scan of her ID in her hand, looks up at him: 'Why?' – 'We need the real ID. A scan isn't enough'. Our group is now blocking the entrance to the club, looking perplexedly between Dana and the doormen. Some of us start arguing that Dana is obviously older than 19, barraging the doormen now with random facts about Dana's life, trying to convince them to let her in. Dana herself, who moved to Toronto from abroad for her PhD, is quiet and intently watches the doormen take in all the new information. When they continue to shake their heads, she turns to us, effectively ending our discussion with the doormen by saying, 'Just go in without me. It's OK. I'm tired anyway.' A chorus of 'No's!' and frustrated sighs breaks out among our group, but Dana has made her decision. We are to go in and enjoy our night since we already paid. Reluctantly, we wave goodbye as she heads back out towards the street.

We shake our heads as we walk down the entrance steps into the club. Posters advertising 'inclusive events' like LGTBQ+ dance nights hang on the wall. The atmosphere on the dance floor is warm and joyful and excitement about the upcoming drag performances is in the air. There's a sense of irony that I cannot shake. The welcoming ambience only begins inside the club. Entering this safe space is restricted, not just for those who are not yet 19 years old, but also to those who are unable to show an official document. I am in Toronto for fieldwork, so my brain immediately goes to draw parallels from what we just witnessed to the broader experiences of immigrants in Canada I have interviewed: that refugees are granted permanent residence – once their claim for asylum has been accepted, which of course is in most cases only possible if someone has entered Canada physically or sought entry into the territory at a point of entry; that immigrants can access Canada's healthcare system – once they have become permanent residents, a stepping-stone that has become more and more restricted.

I am once again stunned by the simple fact that in Canada, simply being able to be physically present makes all the difference in someone's migration trajectory. What is 'inside' – be it a drag show, access to affordable healthcare or citizenship – is only accessible to those individuals who are able to get past

the gatekeepers into the territory. At the same time, it is often not the law itself that might keep someone from entering a space, but its implementation. Dana *is* older than 19. Granting her access to the club would not be a breach of Ontario's Liquor License and Control Act, which prohibits the sale of liquor to persons under 19. It is the requirement to show photo identification in its original, physical form that leads to her exclusion from the club space. In other words, the implementation of legislation often extends to more than the object being regulated. Alcohol sale restrictions spill over into clubbing age restrictions, which in turn require implementation guidelines. Based on the law as it is written, Dana should have access to the club space, but that is not what she experienced.

It is this gap between the law *on the books* and its ultimate impact on those governed by it, the law *in action*, that is the focus of this dissertation: the space between citizenship law and the notions of formal membership held by naturalized citizens. Based on the lived experiences of new citizens, I examine the process of citizenship acquisition, asking how does an individual acquire a citizenship formally, administratively, and emotionally and how is that citizenship interpreted? The examination is conducted in the form of two case studies of naturalization in Germany and Canada and divided into five parts. The first chapter develops the theoretical basis of understanding naturalization not only as a formal administrative process, but as impacted by an individual's entire migration trajectory, which, in turn, is influenced by legal frameworks beyond citizenship law. Chapter two and three examine the German case first, exclusively from the perspective of new German citizens. This is followed by a joint analysis of both migrants' and caseworkers' experiences. Chapter four focuses on the Canadian case. Chapter five rounds off the thesis through a comparative analysis of German and Canadian new citizens' legal consciousness.

This introductory chapter will first provide a brief introduction to naturalization both in scholarship and legislation, situate this interdisciplinary thesis in the literature it contributes to, elaborate on case selection and methodology as well as positionality, and finally outline the subsequent empirical chapters.

1.1 Naturalization in the Law and in the Literature

Questions regarding formal membership and physical presence have increasingly concerned citizenship scholars. In this modern landscape of voluntary and forced migration, states are pulled between the goal of providing political and civil rights to those who live in their territory long-term and the tension around questions of allegiance concerning those with more than one citizenship. Bauböck has outlined the discrepancy between territorial borders and the boundaries of membership due to people's growing cross-border mobility (2008). One of the questions that emerges from this tension is, how do states

leverage this last 'bastion of sovereign discretion' that is citizenship law into meaningful membership? (Spiro, 2011: 694)

Citizenship law has evolved drastically in liberal democratic states over the past century as globalization has facilitated the mobility of people through both political and technological developments (Aharonson and Ramsay, 2010: 183). Mobility, in turn, has led to an increase in individuals holding more than one citizenship. This effect has been amplified by multiple factors: (1) bilateral agreements negotiating obligations of loyalty concerning dual nationals (such as military service) to only concern one country of nationality (Spiro, 2017); (2) gender-neutral policies of citizenship distribution allowing children to also acquire their mother's nationality; (3) states formerly governed exclusively by ius sanguinis increasingly introducing ius soli provisions to accommodate second and third generation immigrants; (4) the renunciation of nationality when acquiring an additional citizenship being stipulated less and less.

But within citizenship law, naturalization requirements – the conditions set by a nation state for an individual to become a member of its citizenry – have also evolved as more and more people move across national borders and settle in different territories than they hold citizenship of. The formal requirements for legal membership have generally become more open and liberalized, but migrants are simultaneously increasingly asked to demonstrate their worthiness of the status as states 'grant citizenship [... depending] in part on perceptions of their membership and contribution' (Bloemraad et al., 2019: 96). This change is tangible in the growing number of economic requirements for naturalization and the attempts to enforce cultural assimilation by including citizenship tests and integration courses in the process of citizenship acquisition (Orgad, 2020; Stadlmair, 2018). These shifts in naturalization policy have meant that citizenship status is theoretically accessible to more people but only under a growing number of conditions (Goodman, 2010).

While becoming a citizen was long seen as an essential part of the process of integration, newer naturalization regulations put greater emphasis on cultural and civic integration as a prerequisite for formal membership and have made a lack of such integration a sufficient justification for the denial or deprivation of said membership (Gerdes et al., 2012; Joppke, 2010; Mantu, 2018). This fundamental change in governance is a further consequence of the increased perception of immigrants as a security risk (Graebsch, 2019; Van der Woude et al., 2017). An individual is only allowed to gain full membership of a citizenry once they have proven worthy of it. Criminal law and criminal procedures thus play a growing role in the regulation of migration, a development also referred to as crimmigration (Stumpf, 2013).

Citizenship scholarship has spent much time thinking about the nature of citizenship: Marshall's definition of citizenship as an expanding set of rights bestowed by the state on the individual (Marshall, 1950); citizenship as membership of a political community marked by rights, duties, participation and identity (Delanty, 1997; Lupien, 2015); citizenship as a set of dimensions

encompassing legal status, rights and duties, political participation, and a sense of belonging (Bloemraad et al. 2008); citizenship as performance also done by non-citizens (Isin, 2019). A universal definition of citizenship within the literature (nation states do define citizenship in their laws, of course) does not exist and arguably should not as a rigid set of characteristics would cheapen citizenship's fluid, relational component (Tully, 2014).

Citizenship policies in turn are often argued to be a reflection a country's identity – what it values in a citizen – and are commonly used as an indicator of a state's overall approach to immigration (Huddleston and Vink, 2015). As citizenship acquisition marks the final step in the formal integration process, research focusing on the acquisition of citizenship has long tried to identify and evaluate the precise factors that determine whether someone will naturalize. Early literature focused mainly on the 'why' of naturalization, examining reasonings and characteristics of the citizenship applicants – especially Latin American immigrants living in the United States (Grebler, 1966; Jones-Correa, 2001; Yang, 1994). Beyond the individual's personal characteristics, naturalization scholarship has since expanded to include aspects of the immigrant's country of origin (does it allow for dual nationality? Is it a developed nation?) as well as the citizenship policies of the destination state (Bloemraad, 2004; Huddleston, 2020; Vink et al., 2013). The extension of possible determinants of naturalization outcomes within the literature demonstrates a growing understanding that citizenship policies are 'crucial' in determining naturalization outcomes as they govern the conditions under which immigrants are able to naturalize (Vink et al., 2013: 4). It is not simply the individual's motivation (or lack thereof) to become a citizen that matters, but rather the interplay of an array of factors pointing at a conceptual distinction between immigrants' interest and ability to naturalize (Huddleston 2020).

1.2 Research Question and Contribution

As the naturalization literature has evolved, the key questions of 'why' and 'why not' have yet to be comprehensively answered. From a quantitative perspective, Hainmueller et al. highlight naturalization's double selection bias due to 1) the determinants of whether an immigrant applies for naturalization being still largely invisible to scholars and 2) the decision-making procedures of street-level bureaucrats processing naturalization applications remaining similarly in the dark (2017). Birkvad outlines the developing literature centering immigrants' experiences and their meaning making of naturalization and citizenship (2019). He pinpoints a divide between studies finding naturalization decisions driven by 'instrumental' or 'strategic' reasons and those that report emotional and sentimental motivations (see e.g. Aptekar, 2016; Erdal et al., 2018; Gálvez, 2013; Harpaz and Mateos, 2019). Making use of similar categorizations, Witte describes certain migrant groups' reasons for not natural-

izing as 'rather trivial' (Witte, 2018: 13). However, Birkvard's own analysis of immigrant experiences in Norway calls this sharp categorization of motivations into question as immigrants are not easily sorted into either category but rather name both types of reasons for seeking citizenship, that are often deeply intertwined (2019). This finding is consistent with other studies examining how immigrants understand their citizenship (see e.g.Della Puppa and Sredanovic, 2017; Yanasmayan, 2015). In their review of citizenship scholarship, Bloemraad and Sheares highlight that research should move beyond the query of whether citizenship matters and ask why and to whom formal membership is important (Bloemraad and Sheares, 2017). Their call for comparisons across political regimes examining the application of citizenship law is slowly being answered with the 'first comprehensive, comparative study' of naturalization from immigrants' perspective being published in 2021 (Badenhoop, 2021: 14).

This aspect of the 'application of citizenship law' is gaining in salience as Haller and Yanasmayan have introduced the concept of the 'bureaucratic trajectory', denoting both the frequency and intensity of forced-migrant-state interactions throughout their migration trajectory (asylum, welfare, citizenship offices, etc.) (2023). They find that immigrants with 'particularly turbulent bureaucratic trajectories' react strongly towards these bureaucracies either disengaging from them as much as possible – dropping their efforts to naturalize – or engaging fully. This focus on of the effects of bureaucratic encounters on naturalization outcomes further complicates Huddleston's (2020) differentiation between someone's interest and their ability to naturalize. Naturalization regulations detail the 'permeability of the defined citizenry', the accessibility of citizenship status to immigrants, making the understanding of naturalization law and its implementation a crucial part of what citizenship *is* (Price, 2017: 2). It is one thing to extrapolate what kind of citizen is meant to be formed based solely on citizenship policy, but another to comprehend what citizens the actual execution of the policy produces. Andreetta et al. stress the importance of considering procedural dimensions of state-(non)citizen interactions in order to grasp their role in 'reproducing or transforming the inequalities and exclusion that are at the heart of citizenship as a legal status' (Andreetta et al., 2022: 905).

The question thus remains, *how* does an individual acquire a new citizenship? It may be tempting to determine the impact of the naturalization procedure on the individual by examining the existing naturalization requirements and to extrapolate possible challenges and impressions based on these regulations. For example, some people might struggle to learn the official language of their new home, they might be on social or economic benefits and thus not sufficiently financially independent, or they might have committed crimes that disqualify them from naturalizing. On the other hand, new citizens could feel empowered through integration and language courses, studying for and taking a citizenship test might instill or highlight certain values to them that their new home state views as central to its civic nature, and naturalization ceremon-

ies or oaths might impart a sense of allegiance and belonging to a state. However, it is not citizenship policy alone that determines whether someone will become a citizen. Immigrants navigate all kinds of law during their migration trajectory, which can lead to (unintended) interactions between bodies of law. This thesis thus conducts its analysis on the basis of individual migrants' lived experiences as the interplay of legislations becomes tangible and observable in their trajectories. As John Griffiths outlines in his work on *The Social Working of Legal Rules*, legislated rules alone cannot be utilized as a means for social change, but their impact can be understood when examining individuals' behavior on the 'shop floor' or 'street-level', as the public administration scholar would say (Griffiths, 2003; Lipsky, 2010).

Within naturalization scholarship, studies of individuals' experiences and notions of citizenship are often referred to as examining citizenship 'from below' instead of 'imposing some predetermined view' 'from above' (Shinozaki, 2015: 19; see also Maier, 2021; Monforte et al., 2019; Winter, 2021).

This dissertation follows in the tradition of this research approach and asks

How does the naturalization procedure impact new citizens' notions of citizenship?

In answering this question, this dissertation connects and contributes to three main strains of literature. It addresses citizenship studies examining the why and how of naturalization. In order to better understand these processes of citizenship acquisition, as outlined above, I also draw from public administration literature on street-level bureaucrats and discretion as well as socio-legal scholarship concerning crimmigration, procedural justice, and legal consciousness.

The key contributions made are threefold. Firstly, I build a theoretical bridge between naturalization and crimmigration scholarship to highlight the necessity of considering the legal frameworks in which citizenship policies are implemented. After examining the impact of crimmigration systems, particularly regarding questions of legal residence, I argue that taking citizenship policy at face value limits the validity of its analysis. As observed by Haller and Yanasmayan (2023), citizenship outcomes – here, naturalizing or not naturalizing – are not solely determined by the formal naturalization process. Observing naturalization only from the point of the application for citizenship onwards means disregarding, at best discounting, the previous stages of an individual's migration trajectory, such as entry and temporary stay within the destination country, which are not directly governed by citizenship law.

Secondly, I extend the growing naturalization literature by focusing on the perspective of those governed by naturalization policies through the analysis of lived experiences of citizenship acquisition in Germany and Canada. In the German case, my work provides a unique insight in the naturalization procedure as I gather experiences of both new citizens and their caseworkers

at the relevant citizenship offices. Shedding light on both sides of the application for and allocation of formal membership allows for a deeper understanding of naturalization's procedural dimension (Andreetta et al., 2022). Here, I am further able to explore how discretionary power is understood by those imbued with it and perceived by those impacted by it.

Lastly, by making 'real-life vignettes' a part of my interviewing methodology I add to the exploration of vignettes as tools in qualitative interviewing. Traditionally used as stimulus material in quantitative research and most often in the form of hypothetical scenarios (Sampson and Johannessen, 2020; Spalding and Phillips, 2007; e.g. Corser and Furnell, 1992), vignettes based on the lived experiences of my interviewees aided the discussion of socially undesirable behaviors and attitudes within Foreigners' Offices.

1.3 Case Selection, Methodology & Positionality

1.3.1 Naturalization in Germany & Canada

Laws regulating the allocation of citizenship are specific to every nation state, as the constitution of a state's people is crucial to a country's existence and the sovereignty over said set of laws is still viewed as critical (Spiro, 2011). When researching citizenship implementation, the choice of state to examine is thus effectively the selection of the case to be studied. Qualitative case studies serve the in-depth analysis of a bounded system, which in turn denotes 'a single entity, a unit around which there are boundaries' (Merriam and Tisdell, 2016: 38; Smith, 1978). For this dissertation, these bounded systems describe the states within which the respective citizenship laws, whose implementation is to be examined, govern the acquisition of citizenship: the Federal Republic of Germany and Canada. Between these two case studies, Germany constitutes the primary case analyzed with two chapters solely focused on the lived experiences of new German citizens and their caseworkers at the naturalization offices. The Federal Republic is often characterized as the prime example of an 'ethnic' nation due to its citizenship policy being based on the principle of ius sanguinis up until the 1990s (Miller-Idriss, 2006: 543). As stated by Triadafilopoulos, Canada and Germany form a most different cases comparative design with Canada being a 'classical country of immigration' while Germany has been more reluctant to embrace that label (Triadafilopoulos, 2012: 3). Canada constitutes the secondary case with chapter five examining new Canadians' experiences of naturalization. Both countries are home to significant migrant communities, constituting 23 percent of Canada's population and 14 percent of Germany's (Bundeszentrale für politische Bildung, 2023; Government of Canada, 2022). In recent years, the respective naturalization dynamics as well as citizenship policy reforms have furthered the differences in the two state's citizenship regimes: Immigrants in Canada naturalize at a

much higher rate than their German counterparts. 80.7 percent of eligible permanent residents had become Canadians by 2021 compared to the German naturalization rate of 1.1 percent (Die Bundesregierung, 2024; Statistics Canada, 2022). However, Germany has seen a recent uptake in naturalization rates (a trend likely to continue as the country just passed major reforms making citizenship more accessible) while the Institute for Canadian Citizenship reports a 'steep decline' in eligible permanent residents naturalizing within 10 years. In 2021, the relevant share had dropped to 45.7% compared to 67.5% in 2011 and 75.1% in 2001. The overall naturalization rate remains high, but the downturn in naturalizations within 10 years has researchers and policymakers concerned regarding the future of naturalization in Canada.

The two states further offer a compelling comparison based on their approaches to citizenship policy implementation. Even though citizenship legislation remains a federal matter in both cases, the implementation of said policy takes place adversatively. Canada's policy implementation operates centralized through the department of Immigration, Refugees and Citizenship Canada (IRCC) with only limited applicant-caseworker interactions in one of the 23 local offices across the nation. The German bureaucratic apparatus stands in stark contrast to the IRCC: It is fully decentralized with immigration policy being implemented by local municipalities, where formal (and informal) guidelines can differ by state, district government or municipality (Dörrenbächer, 2018). German bureaucratic culture dictates largely in-person operations and client-caseworker interactions with 82 local offices in the state of North-Rhine Westphalia alone.

1.3.2 Methodology

A research design featuring two case studies rather than a single case study allows the researcher to compare results across cases, enabling a comparison of differences and similarities between both cases. Multicase case studies also serve to enhance a study's external validity (Merriam and Tisdell, 2016). The inclusion of an additional case next to the German case study was important to me specifically to avoid possible personal biases having grown up in Germany that could have arisen from knowing its bureaucratic culture from personal experiences. While the data collected during fieldwork did not lend itself to a fully comparative thesis due to my inability to gain access to sufficient IRCC respondents, expanding the analysis beyond the German case was crucial to the quality and validity of the findings concerning both cases.

The empirical foundation of the subsequent chapters is largely made up of 42 in-depth interviews with new German citizens (15), Canadian naturalized citizens (15), German citizenship caseworkers (9), as well as three individuals working for the Canadian government (namely one Canadian Member of Parliament (MP), one employee of the IRCC, and one office staff member of

a Canadian MP). The interviews were conducted between the fall of 2021 and spring of 2023. Interviews took place both in-person in the governmental district of Cologne, Germany, and the city of Toronto, Canada, as well as online as video calls via WhatsApp, Webex and Zoom. New citizen interviewees were recruited by contacting the local migrant support institutions, calls for participants through social media, along with snowballing after the first interviews had taken place.

In-depth semi-structured interviews were a natural fit for my research inquiries. As I was trying to understand possible (unintended) interactions of legal frameworks, I needed a flexible mode of data collection that allowed for unforeseen factors to arise (Legard et al., 2003). I was able to collect not only data that was asked for explicitly but could also 'pursue unanticipated opening[s]' (Martin, 2013: 123). The shape this thesis has taken was very much influenced by this approach. At the outset, I had planned to interview naturalized as well as natural born citizens in the interest of comparing their notions of and feelings toward citizenship. However, after conducting the first few interviews with new German citizens in the fall of 2021, I could not ignore how present their caseworkers were in these interviews. I had planned and asked questions about interactions with street-level bureaucrats, but the extent to which they seemed to matter to my interviewees still surprised me. This led me to pivot away from my initial plan and to focus instead on naturalization itself – to examine the process from both sides and to involve caseworkers.

Caseworkers were recruited through formal inquiries with their respective departments. I contacted the departments via mail, which included a formal cover letter as well as an outline of the research project. Out of the three departments I contacted and later conducted interviews at, I followed up with one via phone call and one in person. My efforts to conduct interviews with Canadian citizenship officers were not as fruitful, as I could only get ahold of one IRCC staffer that was willing to be interviewed. Further inquiries both digitally and via mail remained unanswered or continuously redirected me towards new persons to contact. As will be discussed further in the relevant chapters, these developments somewhat reflect the Canadian approach to citizenship policy implementation: keeping it behind closed doors.

The new citizen interviews as well as those with bureaucrats followed a semi-structured approach that differed in said structure. The naturalized citizen interviews chronicled the participant's migration history starting with their arrival on Canadian or German territory (if they had not been born in Germany) and then focused on the interviewee's recollection of the naturalization process itself. Subsequent questions also focused on when participants felt their new status as citizens had become tangible in their daily lives and to what extent they felt Canadian or German.

The interviews with bureaucrats made use of real-life vignettes. In the first half of the interviews, the German naturalization caseworkers were similarly asked to describe the naturalization process and their role in it. Their summary

of the process was further developed through follow-up questions on some of the procedural details. The second half of the interviews made use of real-life vignettes in an effort to connect the interviews between new citizens and naturalization caseworkers. These anonymized vignettes were based on interactions that respondents who had naturalized in Germany had described to me. Sampson and Johannessen utilized real-life vignettes 'as a way of encouraging participants to recall examples of real events and (...) to explore how commonplace some previously observed experiences were' (2020: 60). After being handed these vignettes, one after the other, caseworkers were encouraged to reflect on the vignettes and the behavior of their colleagues as well as that of the immigrants involved. The utilization of vignettes, which the interviewees knew were based on real events, facilitated a deeper level of conversation than would have otherwise been possible in the one to two hours of interview time with the naturalization caseworkers.

Interviews with German citizens and caseworkers were conducted in German while interviews with their Canadian counterparts took place in English. Any direct quotations by German interviewees in this thesis have been translated by the author. The interviews were transcribed and coded manually through Atlas.ti. Further details on methodological approaches and sampling are outlined in the respective chapters.

1.3.3 Positionality

Contemplations of positionality and reflexivity involve 'self-scrutiny on the part of the researcher' (Bourke, 2014: 1-2). Reflexivity is, as Day states, 'not a magic cure' (2012: 80) for methodological dilemmas, but as a qualitative researcher conducting phenomenological interviews (Seidman, 2013), certain aspects of my identity and life history are worth reflecting on here as they shaped the entire research process – not least my interest in the subject of naturalization. I focus here on the data collection stage as this is the phase of the research where I was most aware of actively navigating facets of my identity and their implications. As a German citizen by birth, who had lived in the Netherlands for more than four years at the beginning of fieldwork, the key identities I was navigating throughout the interviews were of me *as a German* and me *as a migrant*. I noticed throughout the interviews with new citizens that it was easier to build rapport when I was open about the fact that I had also moved to another country. Embracing my identity as a migrant, mentioning my struggles with learning Dutch, and navigating a new culture, seemed to help interviewees understand why I was interested in their experience.

When speaking to naturalized Germans, this shared experience of migration served a dual function. On the one hand, it helped me distance myself from other Germans they would have to interact with and give information to, like

their caseworkers. I wanted to make sure that they did not feel like they were being tested or judged by me on their integration efforts. On the other hand, it helped me express my empathy to their journey while offering them the implicit opportunity to ask me questions about my experiences, which some did. In contrast to these interviews, I leaned more into my German identity when conducting the interviews with German caseworkers. I emphasized my outsider perspective as someone who had not lived in the country for a few years and asked for more tacit knowledge to be verbalized. In this case, I balanced this outsider identity with my experience of living in Germany for the first 22 years of my life and thus being aware of cultural contexts relating to German bureaucracy and German life and work culture.

During my fieldwork in Canada, the implications of my identity on the interviewing process where slightly different. In interviews with naturalized Canadians, I also mentioned my own experiences of migration, but my identity *as a German* became secondary to me *not being Canadian*. Hence, I had more of an outsider's perspective on Canada than I had on Germany. This role as an outsider was particularly apparent during the interviews with Canadian bureaucrats, where I could rely less on an awareness of cultural contexts than I had in Germany.

While analyzing the interview data, re-listening to the interviews and coding the transcripts inductively, while noting down my own expectations, were crucial steps to (1) ensure I did not leave the contextual interpretation of what the interviewees said up to my memory of the conversation and that (2) I was not applying pre-determined categories and definitions to my participants' lived experiences. But as Bourke notes, 'it would be naive on my part to suggest that codes and themes emerged from the sources of data absent of any other influences' (Bourke, 2014: 4).

My dissertation makes use of the terms 'immigrant', 'migrant', 'citizen', 'new' or 'naturalized citizen', etc., but I, the author, do not believe in the natural existence of these categories. This is to say, the nation-state system and all categorizations resulting from and reaffirming its existence have been constructed. Nevertheless, I utilize these categories for the tangible, real-life impact that they have. Studies of a heavily constructed concept such as citizenship easily fall into the trap of methodological nationalism, the naturalization of the nation-state (Moffette and Pratt, 2020; Wimmer and Schiller, 2003). The centering of national citizenship in this dissertation does not signify the endorsement of countries as the natural units of analysis, but rather hinges on the dissertation's main interest into individuals' perceptions and experiences of the acquisition of a nation-state citizenship. While many of the experiences and perceptions documented in this work where heavily shaped by the societies and places they occurred in, namely the Federal Republic of Germany and Canada, I hope to shed light on the fact that they are neither unique to either of these places nor exclusively produced within one nation-state's borders.

1.4 Outline of the Thesis

This thesis consists of five articles, the content of which is briefly sketched here. The first article and second chapter of my dissertation, *Future Citizens between Interest and Ability: A Systematic Literature Review of the Naturalization and Crimmigration Scholarship,* lays the theoretical groundwork for the empirical chapters. Through a systematic literature review of the 140 most-cited papers from the naturalization and crimmigration literatures, I argue for the inclusion of crimmigration as a factor in studies of naturalization. Naturalization research has extended its analysis of the determinants of citizenship acquisition over the years. However, it still lacks the contextualization of immigration law in its relation to criminal law. This review of the crimmigration and naturalization scholarships offers new insights into the underexplored relationship between citizenship policy and the individual migrant, potentially uncovering some of the factors hindering immigrants' ability to seek formal membership – particularly regarding residence requirements. I review the prominent streams of both strands of literature by first utilizing a bibliometric analysis of the respective citations networks and second, by diving into the substantial developments and parallels in naturalization and crimmigration research. A version of this chapter has been published in *Ethnicities* 24(1).

In the third chapter, *'I'm not German, I am a naturalized German'*, I turn to the first case study examining the rationales for naturalization. This chapter is based on 15 semi-structured interviews with new German citizens. The thematic analysis of their lived experiences of citizenship allocation offers unique insights into the motivations of those choosing to apply for citizenship and the bureaucratic and societal factors impacting these motivations. The acquisition of German citizenship is especially potent for third-country nationals, who wish to become or – in the case of British citizens – remain European Union (EU) citizens. Naturalized Germans with another EU nationality often report identifying as a 'European citizen'. For these citizens, naturalization is often not strictly necessary, but nonetheless a freeing step as citizenship law does not only affect migrants through bureaucracy but also through small indignities in everyday life. This chapter has been accepted as part of an edited volume at Palgrave Macmillan.

The subsequent fourth chapter, *The Getting and Granting of Citizenship*, further deepens the German case study introduced in chapter three by including the perspective of naturalization caseworkers. Based on 15 semi-structured interviews with new German citizens reflecting on the naturalization process as well as 9 interviews utilizing 'real-life' vignettes with caseworkers evaluating citizenship applications, this chapter explores the impact of discretionary power and the perception thereof by migrants on the naturalization process. I also identify where bureaucrats have to make use of their discretion and how they wield this power. The interviews with new German citizens add the rare perspective of those depending on the outcome of bureaucratic

decision-making. As the perception of discretion is seldom focused on in studies of policy implementation (Bartels, 2013; Goodsell, 1981), this chapter offers a unique glimpse at both sides of the naturalization process. I find that the creation of implementation guidelines for caseworkers occurs on the state, municipal, departmental and in some cases even on the individual level.

Chapter five, '*Am I really a full Canadian? I'm not': Immigration Experiences of New Citizens in Canada*, introduces the second case study exploring the lived experiences of naturalized Canadians, mirroring chapter three. Based on 15 semi-structured interviews conducted in Toronto, Ontario, I examine experiences of naturalization beyond the formal process of applying for citizenship, highlighting the crucial role of permanent resident status regulations. Canadian citizenship policy operates under the broader human-capital citizenship paradigm (Ellermann, 2020), which shapes not only the naturalization procedure but all immigration related regulations. While the literal Canadian citizenship policy can be interpreted as liberalized over the years, it is permanent residence (PR) that presents the main challenge to those wanting to become Canadian citizens. What used to be a one-step trajectory towards citizenship as the majority of migrants used to arrive with PR on Canadian soil, has been transformed into a two-step trajectory of temporary statuses, which made the attainment of PR into a bureaucratic bottleneck for immigrants. I find that the erosion of (felt) security from deportation under permanent resident status leads many migrants to apply for citizenship in order to minimize their own deportability.

The final chapter *Legal Consciousness of New Citizens* provides a rare comparative case study of naturalization experiences based on 30 semi-structured interviews with naturalized citizens in Canada and Germany. In doing so, it brings together the two case studies. Making use of Ewick and Silbey's approach of studying legal consciousness through the narratives of 'ordinary' people about the law in their daily lives (1998), the analysis pays special attention to the relational dimension of legal consciousness. While Canadian naturalization procedures are implemented through a centralized bureaucracy, this process has been heavily decentralized in Germany. This means that different kinds of relationships are cultivated between new citizens and their state as well as their new citizenry. Hence, this chapter explores where new citizens see themselves in relation to the law and how this perception is further influenced in its relational dimension by the respective state's citizenship policy implementation.

I conclude the dissertation with a reflection on and answer to the central research question as well as the key findings of these five chapters along with their implications for further research as well as the limitations of the study. Finally, a post-script contemplates the 2024 German citizenship law reform that came into force mere weeks before the submission of this thesis.

Before diving into the substantive chapters investigating the naturalization process mainly from the new citizens' perspective, it is important to acknow-

ledge one last point: The focus of much of the analysis lies on the perception of injustices as well as unfair treatment and circumstances of migrants navigating the immigration apparatuses in Germany and Canada. This is not to say that the experiences shared by the interviewees were exclusively difficult or discriminatory. Not one person I spoke to regretted becoming a citizen. For many, immigrating and acquiring citizenship meant feeling more secure in their status and identity. These feelings of security were especially pronounced for those fleeing war or persecution. For others, citizenship status – while imperfect – still imbued them with a feeling of recognition of their identity as German or Canadian. Although frustrations about bureaucratic proceedings and in some cases individual caseworkers were omnipresent, relief and gratitude towards the parts of the system that functioned well were also expressed. This might of course be owed – at least partially – to the fact that this dissertation concentrates on the 'success stories', those individuals that gained citizenship. But nonetheless, it is worth stating that even in an imperfect, often unjust, constructed system that has established borders both between and within territories, naturalization improves people's lives. This means that the procedure's undue challenges and incidences of mistreatment merit special attention. A process as potentially existential for immigrants and central to a modern nation state as naturalization requires the maintenance of procedural justice.