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External and residence-based Italian citizenship in the Brexit context

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ABSTRACT

Brexit, which caused Britons to lose E.U. citizenship and E.U. citizens in the U.K. to lose E.U. legislation protection, represents a challenge for the citizenships of E.U. member states. In this context, I explore the experiences with respect to Italian citizenship of Italians in the U.K., Britons in Italy, and Britons in the U.K. and elsewhere with claims to Italian citizenship. I show how Italian citizenship legislation, despite recent restrictions, still offers good protection to Italians abroad and relatives of Italian citizens. While naturalization by residence in Italy is characterized by exclusionary requirements, I show how the British population in Italy also includes long-term residents who have not sought naturalization despite meeting the requirements well before Brexit. Beyond the letter of the law, procedures of naturalization and the functioning of the linked institutions – especially consulates – are key in the experience of citizenship. For some interviewees, it was less complex to meet the requirements in the letter of the law than to prove it through the procedures. More generally, the analysis shows the complexity of citizenship in its internal and external dimensions, in the stratification of the experiences for different profiles of citizens and applicants, and in the interaction between the letter of the law and its implementation.

RIASSUNTO

La Brexit, che ha comportato la perdita della cittadinanza U.E. per i britannici e la perdita della protezione legale U.E. per i cittadini U.E. nel Regno Unito, rappresenta una prova per le cittadinanze degli stati membri U.E. In questo contesto, esploro le esperienze legate alla cittadinanza italiana di italiani nel Regno Unito, britannici in Italia, e britannici nel Regno Unito e altrove che hanno esplorato l'ottenimento della cittadinanza italiana. Mostro come la legge italiana sulla cittadinanza, nonostante restrizioni recenti, continua ad offrire una buona protezione agli italiani all'estero e ai familiari di cittadini italiani. La naturalizzazione per residenza in Italia è caratterizzata da requisiti escludenti, ma nell'articolo mostro come la popolazione britannica in Italia includa anche residenti di lunga durata che non avevano fatto domanda di cittadinanza nonostante abbiano raggiunto i requisiti ben prima della Brexit. In aggiunta al testo della legge, le procedure di naturalizzazione, ed il

funzionamento delle istituzioni collegate (i consolati in particolare) sono centrali nel plasmare le esperienze della cittadinanza. Per alcuni intervistati è stato più semplice raggiungere i requisiti di legge che provarlo tramite le procedure previste. Più in generale, l'analisi mostra la complessità della cittadinanza nelle sue dimensioni interne ed esterne, nella stratificazione delle esperienze per diversi profili di cittadini e candidati, e nell'interazione tra il testo della legge e la sua applicazione.

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In this article, I analyse Italian citizenship in its internal (naturalization of resident non-citizens) and external (naturalization and holding citizenship abroad) dimensions. I do so by exploring the experiences of Italian citizenship in the context of Brexit among Italian citizens in the U.K., British citizens in Italy, and British citizens who have explored obtaining Italian citizenship in the U.K. or elsewhere. The interest of investigating Brexit is that, as a major withdrawal of status and rights, it can be seen as a 'stress test' for citizenships of E.U. member states and the capacity of citizenship legislation to protect different categories.

Brexit has been recognized (see Mindus 2017; Kostakopoulou 2018; Barbulescu and Favell 2020; Sredanovic and Byrne 2024) as a moment of crisis that challenged the substantial protection offered by E.U. freedom of movement. It caused British citizens to lose E.U. citizenship rights and E.U.27 citizens in the U.K. to lose most E.U. protections. Other groups with an interest in Italian citizenship, such as most third-country nationals in Italy or descendants of Italian citizens in Latin America, have always been potentially aware of the difference between the degree of migration control they were subject to and the protection and facilitations that an Italian (and therefore E.U.) passport could bring. For Italian citizens in the U.K., and Britons in 'old' E.U. member states, the degree of rights already available through E.U. citizenship reduced the interest in pursuing a national citizenship. Therefore, Brexit did not only involve the loss of formal rights and, in the U.K., worries about xenophobia and the economy (e.g. Rzepnikowska 2019; Benson 2020; Brahic and Lallement 2020; Sredanovic 2021, 2024), but also involved groups who had often considered themselves safe and not really 'migrants' until then (Benson 2020; Brahic and Lallement 2020; Sredanovic 2024). Also, the fact that E.U. citizenship rights (and, before that, European Community rights) had been available for decades before Brexit, made British and Italian citizens feel more secure compared to E.U. citizens from the more recent, post-2004, enlargement (cf. Lulle et al. 2018).

The analysis presented here also follows insights on how implementation and procedures can change the meaning of the letter of a citizenship law (e.g. Hajjat 2012; Fargues 2020; Fargues et al. 2024; Sredanovic 2022; Trucco 2023, 2025) to look at how both the procedures and the institutions involved in naturalization influence the experience of the interviewees.

This article is based on a selection of interviews from a larger project on the impact of Brexit on the value and meaning of national and EU citizenship. The qualitative in-depth interviews used here were held with nineteen interviewees who include Italian citizens in the UK (seven), British citizens in Italy (three), British citizens in the UK who have explored obtaining Italian citizenship (eight) by marriage, descent or residence (a British couple with a transnational life between Italy and the U.K. in the latter case), as well as one British citizen in Belgium who has explored obtaining Italian citizenship by marriage. This group is balanced by gender and tends to be younger (between their late twenties and their forties) for Italian citizens and slightly older (between their thirties and eighties) for British citizens, with a broad middle-class/professional profile for most interviewees. The interviewees have been identified by a combination of calls for interviewees on Facebook (mostly in Facebook groups for migrants of specific nationalities) and Twitter (general messages on the researcher's profile) and a snowball procedure. The interviews have been conducted between 2018 and 2022, both in person and remotely (phone or online), with the interviews with Britons in Italy and those since the start of the COVID-19 pandemic conducted all remotely. The interviews included questions about the impact of Brexit, bureaucratic experiences before and after the 2016 referendum, plans for naturalization and/or further migration, and relations with consulates.

In the following sections I give more institutional background about Italian citizenship legislation and Brexit, and then discuss in order the impact of Brexit and the role of Italian citizenship for Italian citizens in the U.K., British citizens in Britain who explored external Italian citizenship, and British citizens in Italy.

The institutional contexts of Italian citizenship and Brexit

The Italian citizenship legislation has been characterized since 1992 by restrictive measures for resident immigrants and generous ones for descendants of citizens abroad. Writing about such legislation in 2006, Zincone used the concept of 'legal familism' (cf. Pastore 2004 for a similar account). This concept described a law that provided (and still provides) limited facilitations in access to citizenship to those born in Italy from non-citizens (who can become Italian only at 18, provided they have lived in the country without interruption), no facilitations for those who grew up in Italy, and requires ten years of residence from

ordinary applicants (five for stateless applicants, four for E.U. citizens). At the same time, the law was generous both toward the descendants of Italian citizens, who could naturalize as-of-right even with limited connections to Italy, and to the spouses of Italian citizens, who could naturalize without any other requirement if resident for the previous six months in Italy, or three years after the marriage if resident abroad. It could be added that the Italian law was not particularly cultural (Sredanovic 2017): while maintaining some cultural criteria when dealing with the questions of the Eastern Borders with Austria and Slovenia, citizenship by descent and marriage was purely based on familial links. Further, the wave of citizenship tests and language requirements that have spread across Europe since the late 1990s (Goodman 2010) reached Italy only later. Indeed, between 2010 and 2018 the country was characterized by the paradox in which a language test had to be passed to obtain the 'lesser' status of permanent residence, while there was no such requirement for being granted full citizenship.

Since 2006, a number of things have changed. The restrictive measures are still part of the Italian citizenship law. The campaigns to make the law more inclusive, strongly focused on *ius soli*, and promoted not only by young people of migrant background (Marchetti 2010; Zinn 2011; Sredanovic and Farina 2015; Milan 2022) but also by most centre-left parties (cf. Tintori 2018), have been unsuccessful so far. This not only because of the opposition of the centre-right, which was at specific times particularly active, such as in 2017 (cf. Bulli 2018; Tintori 2018), but also because of an apparent half-heartedness of the centre-left, which started promising citizenship reforms in 1999 (Tintori 2018) but has failed to achieve them despite different stints in government. However, the familistic nature of the law has been weakened through more restrictive measures for naturalization through marriage (although citizenship by descent has remained unchanged). In 2009, the requirement was raised to two years after marriage for residents in Italy. Further, in 2018 a language test was introduced both for ordinary naturalizations and for those by marriage, culturalizing the law while further reducing the familistic dimension.

In the context of Brexit, Italian citizenship as an EU citizenship has become particularly useful not only for previously studied groups such as Latin Americans (Tintori 2009, 2011; Blanchard 2020, 2022), but also for Britons (cf. Sredanovic 2023). As British citizens have lost their E.U. citizenship, Italian citizenship ensures the bundle of rights (and in particular the mobility rights) linked to being an E.U. citizen, something of interest not only for Britons in Italy, but also for those in the U.K. and in other E.U. member states. In the case of Italians in the U.K., following Brexit, a number of protective measures and rights deriving from E.U. legislation

no longer applied in the U.K. The Brexit Withdrawal Agreement defines the rights of E.U. citizens who established residence in the U.K. and of Britons who established residence in the E.U. by the end of 2020, but it does not cover people who moved after that date.

Brexit had no impact on Italian citizenship legislation and had only limited effect on checks conducted on E.U. citizens applying for British citizenship (Sredanovic and Byrne 2024). However, the changes to migration policy in the U.K. and to migration policy in Italy (limited to Britons) and the transformations of E.U. citizenship make Brexit a test of how different groups experience Italian citizenship.

Italians in the U.K.: the safety and transmission of Italian citizenship

As mentioned, Brexit presented a series of challenges for Italian citizens in the U.K. Along with the partial loss of formal rights, and the worries about xenophobia and the economy (Sredanovic 2021, 2024), several of my interviewees notably saw Brexit as a threat to their transnational lives. Having relied on the possibility to move frequently and easily between the UK and Italy, any barriers to international mobility were seen as a potential problem (Sredanovic 2021). Currently such barriers include the requirement to hold a passport (rather than only national I.D.), the soon-to-be-introduced E.T.I.A.S. (on the E.U. side) and E.T.A. (on the U.K. side) electronic visas, the limits to time spent abroad before losing pre-settled or settled status in the U.K. (cf. Barnard et al. 2021) and, for those who arrived after the end of the Transition Period, full visa requirements for work-related and long-term entries. However, beyond the actual changes brought by Brexit, the whole process that began with the 2016 Referendum has been characterized by uncertainties about possible outcomes (Sredanovic 2024). Applying for British citizenship has been a solution for many of my interviewees, although some, less clearly oriented to stay in the U.K., were more likely to consider further mobility or to adopt a wait-and-see approach (Sredanovic 2021).

Despite the transformations started in 2009, the Italian citizenship legislation remains generous towards Italians abroad, and the Italian side of legal status did not pose many problems during the Brexit process for those who were already Italian citizens. The conservation of Italian citizenship, its transmission to one's children (Sredanovic 2023) and, with the exceptions I discuss below, to one's spouse, did not encounter many obstacles in the letter of the law. Other countries are less tolerant to dual citizenship, impose more restrictive time and generation limits for the transmission of citizenship abroad or, as in the case of the Netherlands, require formal confirmation of the intention to keep one's citizenship after a certain number of years spent abroad.

While I interviewed E.U.27 citizens from other countries (Austria, Germany, the Netherlands) for whom obtaining British citizenship involved doubts about the maintenance of the original one, or whose children had to opt between the two, the Italian citizens I interviewed did not have real worries about what a naturalization would have meant for their Italian citizenship or that of their children.

Citizenship by marriage was more complex: I discuss below what this meant directly for some British citizens I interviewed, but it was also something that some Italian interviewees married with Britons mentioned as one of the challenges of Brexit. This was the case for Marta: '[my husband] thought [about Italian citizenship], but he's still thinking about it, in the sense that's it's in our projects, we think we will do it, in the meantime Salvini is also putting spokes in our wheels'. The interview with Marta took place a few days after the 2018 law decree 113 introducing, among other changes, language requirements for naturalization by residence and marriage, and other interviewees, whom I discuss below, also indicated that this was a cause for concern.

As I discuss below, consulates, as the institutions receiving naturalization applications abroad, played a significant role in the experiences of British applicants for Italian citizenship. These understaffed institutions were perceived as one of the main obstacles to becoming Italian. One explanation of such understaffing was offered in her interview by Marta, mentioned above, who argued that the difficulties were due to the under-registration in the register of Italians abroad (A.I.R.E.):

Those registered with AIRE do not reflect the number of Italians, of the Italian community, because apparently only the 50% of the people who reside in Greater Manchester are registered with AIRE ... If half of the people are registered, the services are in proportion to a much lower number. And this is an issue because it is necessary to convince the Italians who live and work here for more than twelve months ... not only it is mandatory, but also ... they cannot complain anymore of disservices, they cannot complain they need months to renew a passport.

With actual penalties for non-registration with A.I.R.E. introduced only in 2023, during the time I which I conducted these interviews there were indeed limited incentives to register. On the one hand therefore the difficulties of the consulates can be attributed to the balance of incentives for Italians abroad to register, as well as to the tendency to build services only for more established and officially registered migrants. On the other hand, as I discuss below, the problems the consulates experienced seem to point more to general understaffing rather than only at under-registration.

Britons and external Italian citizenship

As mentioned, Italian citizenship legislation is still comparatively generous in terms of family-based (descent and marriage) access to citizenship. Furthermore, I have noted elsewhere (Sredanovic 2023) how having or not the option to naturalize by marriage without being resident in the country is fundamental in defining the opportunities for external citizenship. While some of the spouses of Italian citizens I interviewed had encountered obstacles in accessing Italian citizenship, this option was simply not available, for example, for spouses of Spanish citizens who were not living in Spain.

The only exception I found in which the letter of the Italian citizenship law limited significantly family-based citizenship acquisition is linked to historical gender inequalities. Clara, a British woman of Italian descent I interviewed in the U.K., was in one of the blind spots of the Italian legislation on citizenship by descent. Clara's mother had to renounce her Italian citizenship when she married her British husband. The marriage took place when Italian law still provided for women to lose Italian citizenship when marrying a foreign citizen, a provision that aimed to maintain a single citizenship within the nuclear family, and that was struck down in 1975 by the Italian Constitutional Court because of gender discrimination. Still, even though she was descended from an Italian mother, the mother's loss of citizenship represented a rupture in Clara's claim to citizenship which could not be resolved.

Moreover, if the letter of the law is particularly generous, the procedure of citizenship acquisition constituted an infrastructure that brought a number of interviewees to question the generosity of access to Italian citizenship. In a previous analysis (Sredanovic 2023) comparing Italian and Irish citizenship by descent, I highlighted how Irish citizenship resulted more accessible, and not only because of specific provisions (for example, those born on the island of Ireland, or from someone born on the island of Ireland, are deemed citizens at birth without needing to register). Perhaps more importantly, Irish consulates were better staffed in proportion to the procedures required and the public served (at least in the early years of Brexit), and allowed better access to passports than Italian consulates. Tintori (2009) has already discussed the role of procedure in limiting access to Italian citizenship, and has provided much more extreme examples than those I encountered. He discussed how the consular authorities in Argentina and Brazil, faced with a potentially very large population with claims to Italian citizenship by descent, a limited staff, and a duty to complete procedures within two years, introduced a process of 'pre-registration' which delayed by several years even the opportunity to formally introduce a citizenship application. These measures, combined with chronic understaffing, have brought applicants to try and circumvent the consulates by establishing residence in Italy or bringing their case directly to court (see Trucco 2022, 2023). The consulates my interviewees dealt with

also had problems due to limited staffing and delays in citizenship procedures, although these were far from being as extreme as previous studies have found in Argentina and Brazil.

Still, the prospect of difficulties with the procedure was enough to discourage interviewees who had other options or who were not particularly convinced of the need to obtain Italian citizenship. Leila, a British citizen in the U.K. I interviewed together with her Italian husband Bruno, answered in this way about her perspectives about Italian citizenship: 'I just heard horror stories, just that it takes years and years and years. We [she and her husband] have one friend, an Italian guy, and the wife is Taiwanese, and apparently, she applied two years ago and they're still waiting'. The two years mentioned are well within the official time limit for an Italian citizenship procedure, but Leila, who had experience of the British naturalization process within her family of Iranian background, found the Italian procedure to be comparatively more cumbersome. More importantly, Leila was, among my British interviewees, the one least interested in the international mobility afforded by E.U. citizenship – it was more her husband Bruno who showed interest in her opportunities to naturalize.¹ It is worth noting that Leila was also one of the few cases I encountered in the whole research project (and therefore beyond the Italian consulates) for whom a consulate had been proactive in promoting naturalization. As Bruno mentioned immediately after the extract quoted above, when Leila and Bruno registered their marriage at the consulate, Leila was handed details on how to apply for Italian citizenship once she met the length-of-marriage requirements. Walter, a British citizen in Belgium, also avoided applying for Italian citizenship by marriage because he considered the procedure '[excessively] bureaucratic' and costly. Walter also had potential access to German citizenship because of previous service for the German state and to Belgian citizenship by residence, and he applied for and obtained the latter.

Other interviewees who did go through with the application still discussed barriers linked to the procedures, as well as the role of the language requirements introduced in 2018. Edward, who obtained citizenship by marriage, was happy to have avoided the language requirements: 'I applied just after Brexit, I think, with that initial surge . . . when the rules were a bit simpler, then they made the rules more difficult'. Even though he avoided the more stringent requirements, he still considered that his Italian wife's application for British citizenship had been easier: 'I think that [the application for British citizenship] was easier than the Italian one . . . well, it was faster than the Italian one'. Peter, who applied only after the introduction of the 2018 requirements, pointed to bureaucracy in general, but also to the Salvini reform, as delaying his decision to naturalize: 'I was a bit intimidated by the idea of the bureaucracy . . . Maybe there was a gentleman called Salvini who was making it more difficult, anyway, so that was a bit off putting'. It is worth

noting how in Peter's experience the level of language competence required was not a major issue, but the procedure to obtain the certificate was a problem in itself,² especially because he needed to take the test during the COVID-19 pandemic:

I was also slowed down by the fact that as soon as the pandemic hit, you couldn't do the exam anymore ... There were all sorts of problems with the exam, getting the exam back, because they got my date of birth wrong ... but they don't believe that you've got the date of birth ... (Peter)

While Peter was confident in his knowledge of Italian (at least the oral aspect – he had some doubts about the written expression), he felt that getting information about the exam itself was more complex than obtaining the level required: 'They [testing and teaching centres] kind of try and require you to take some classes ... you don't have to, but they don't tell you anything unless you do. So I booked a couple of classes to talk me through what the exam would be.'

Linda, who was applying by descent, and was therefore exempt from the language requirement, still felt the need to improve her Italian, apparently mostly for identity purposes:

I am trying to improve my baby Italian ... because, you know, I wasn't really spoken at home, my parents used to speak to each other, but my dad was a workaholic, so he wasn't around a lot. So my Italian is, you know, very very small.

It's not essential, but for my own personal preference I feel I'd like to have a bit more grip on it. (Linda)

Beyond Peter's specific difficulties in having his competencies in Italian certified, most interviewees in the group either had personally experienced difficulties with the bureaucracy, or at least had negative expectations about the procedure. The two problems most often mentioned were difficulties in obtaining an appointment at the understaffed consulates, and the length of the citizenship procedures, as in the case of Linda: 'At the moment London, especially the Italian Consulate, is overwhelmed ... Apparently it's just horrific, you can wait I think four years for the process.' Peter further discussed the S.P.I.D. digital identity system, and how this was the hardest requirement to meet in his naturalization process, mentioning that without an Italian wife he would not have been capable of understanding what was required nor of obtaining the system itself (cf. Trucco 2025 on the S.P.I.D. as one of the obstacles to naturalization).

The interviews I conducted with British citizens in Italy also highlighted the contrast between the letter of the law, worsened by the Salvini reform but still allowing a relatively easy access to citizenship, and the procedure and implementation, which raised obstacles.

Britons in Italy reacting to Brexit

Among the Britons living permanently or part of the year in Italy who I interviewed, what emerged was a strong difference between pre-Brexit residents and those who moved to Italy in response to Brexit. In the first group, I met three long-term (at least thirty years) residents, all with an Italian partner, and dual national children. While all three were wary of Italian bureaucracy, these three interviewees showed relatively limited worries about the impact of Brexit on their lives. While most of my E.U.²⁷ interviewees in the U.K. and British interviewees in Belgium had worried about their right to stay, work, rent, or access services (Sredanovic 2024), the small group of interviewees living in Italy mostly shared the worries about barriers to international mobility. While the length of residence and the presence of an Italian partner could explain the more limited worries, some of the Britons I met in Belgium discussed a much wider range of worries even when they had situations similar to the interviewees in Italy. Contrasting one long-term resident who naturalized because of Brexit and another who decided against naturalization allows to see a certain range of experiences.

Tammy was explicit that without Brexit she would never have considered naturalization: 'I had no problems, no need to ask for Italian citizenship, you know? The only thing that annoyed me is that I could not vote in political elections [for the] Parliament in Italy'. With Brexit and the consequent restriction in rights, particularly as concerns freedom of movement, Tammy applied, making sure to submit her application before the end of the transition period: 'I've done it [apply for Italian citizenship], I did it before the Brexit deadline on the 31st of December [2020] because . . . well, I had residency for over 30 years, but I wanted to do it as an EU citizen, not as an *extracomunitaria*, non-EU . . .'. As Tammy had not only the residence requirements for the four-years route reserved for E.U. citizens, but also the ten-years route also open to third-country nationals, it is not clear whether the importance given to applying as an E.U. citizen was symbolic, or perhaps linked to expectations about different chances of success for her application.

Todd, on the other hand, did not plan to apply for Italian citizenship, both for identity reasons, and because he saw no negative impact of Brexit on his life that would have justified it: 'I do not feel the need for it [Italian citizenship] yet . . . I mean, I do not feel Italian, and, OK, citizenship is not nationality, but . . . I mean, if it were a . . . problem, then I would take the citizenship, yeah, I wouldn't have a problem, but . . .'. While recognizing a difference between legal status and belonging ('citizenship' and 'nationality' in his words), Todd was one of the few interviewees to oppose naturalization for identity reasons. While keeping the option open if his personal situation worsened as a result

of Brexit, or if he were to move to another E.U. member state (the 'one good reason' he saw to naturalize), Todd opposed Brexit on general political principles, rather than fear of personal consequences.

All three of the long-term residents I interviewed further had a negative opinion of Italian bureaucracy, which for Todd was one of the reasons for not applying for citizenship: 'The bureaucracy here in Italy is such ... I mean, I haven't even gone to take my Italian driving licence, it's sitting there. Because I can't chase the idea of spending a whole day in an Italian office, to take out a document.' Tammy, who went through the procedure, had similar negative comments:

There's always the nightmare of dealing with the Italian bureaucracy, it's very intimidating ... It's bad news, because it's very complicated, and slow moving, and one never feels confident that one has done exactly the right procedure. There's a lot of room for human error on both sides, you know? (Tammy)

She further added: 'It's not only difficult to do, but also expensive, it's cost me, in the end ... about 700 euros.' It is worth noting how the letter of the law – the residence and language requirements, for example – were not seen as a major problem by the two interviewees, and that it was the bureaucracy itself that emerged as a major obstacle to naturalization.

Two other British citizens, who I interviewed as a couple, Lindsay and Colin, had a hybrid position between external and residential citizenship. Both had lived in Italy before Brexit, had worked in tourism with links to Italy, and Colin had previously been married with an Italian woman. However, they were only resident in the U.K. at the time of the 2016 Referendum, which meant that their transnational lives between the U.K. and Italy were endangered by the Brexit process. As a solution, they bought a house in Italy and Colin, who had retired in the meantime, established residence in Italy before the end of the Transition Period. Lindsay, who was still working and had lower taxation in the U.K., remained in the U.K., planning however to establish residence soon in Italy, relying on family reunification if necessary. Still, Italian citizenship was a distant prospect, notably because Colin needed first to accumulate ten years of residence. In their case, the relation to bureaucracy was mixed: they appreciated the local institutions, not least because they had chosen to live in a small municipality that was trying to attract residents to counter depopulation (cf. Carbone 2023 for the similar, but more politicized, initiative in Riace). However, they had a less favourable opinion of Italian consular authorities in the U.K., given the difficulties Colin's son had experienced in obtaining an Italian passport.

Comparing my more established and 'sedentary' interviewees with the mobile transnational couple formed by Lindsay and Colin, it is clear that the letter-of-the-law requirements for naturalization by residence might be secondary for some of the British in Italy, but can have a significant impact on

Britons with substantial links to the country but who had no stable residence there before Brexit.³ Similarly, while bureaucracy appeared more salient for the interviewees who already met the requirements, it remained a significant issue also for those who were a long way from reaching the residence requirement.

Conclusion

I have discussed how Brexit can be considered a 'stress test' for the citizenships of E.U. member states, showing to what extent these are capable of protecting citizens abroad, potential citizens, and the relatives of citizens. In the case of Italian citizenship, this involves exploring how the 1992 law, written mostly for Italians abroad, once defined as familistic (Zincone 2006), but reformed since 2009 in a direction that limits access to naturalization both by residence and by marriage, works for Italians in the U.K. (and their relatives), and Britons with potential access to citizenship living in Italy, the U.K., and other E.U. member states.

In this context, Italian citizenship is still a good resource to contrast the impact of Brexit, not only for those who were already Italian citizens or residents, but also for those with access to external citizenship. Italian citizenship was notably a good way to maintain E.U. citizenship for my British interviewees in the U.K. (and for a British interviewee in Belgium, although the latter finally chose Belgian citizenship). However, those applying for citizenship by marriage encountered more obstacles, particularly after the Salvini reform in 2018, two years after the Brexit Referendum. While the British interviewees with a long-term residence in Italy showed limited worries about Brexit, others, recently and/or partly settled in the country, reported more substantial obstacles.

Brexit has also impacted people who had relied on the E.U. freedom of movement, who in some cases did not perceive themselves as migrants, and who in some cases did not feel the need to pursue naturalization even decades after reaching the requirements by residence or kinship. This means that the experiences of naturalization and citizenship are particularly stratified. Some interviewees did not consider the naturalization requirements themselves to be a problem. They matched every requirement without need to wait to become eligible. For them, the procedures to prove the requirements were the main issue. For example, in the case of Peter, it was not the required competence in Italian that presented a barrier, but rather the need to obtain a S.P.I.D., find a centre authorized to conduct a test, and then make sure that the documentation obtained did not contain errors. If long-term residents and spouses of Italian citizens with a good knowledge of Italian mostly reported procedural barriers, others were more worried about the residence or language requirements

set in the letter of the law (something that is already well-known from research on naturalization by residence in Italy – cf. Tuckett 2018). That said, the material infrastructure of external citizenship, the consulates, emerge as struggling to guarantee citizenship rights, which is something that was known for Brazil and Argentina (Tintori 2009; Trucco 2022, 2023), but now also seems to be the case in the U.K. Moreover, Italian institutions seem to have the reputation of being particularly bureaucratic. Previous literature (e.g. Triandafyllidou 2003; Tuckett 2018) has already shown that the ordinary institutions of immigration control in Italy are highly bureaucratic, probably more so than those of comparable European countries. However, the interviews analysed here suggest a perception of excessive bureaucracy that extends to consular and non-immigration related institutions. It would be interesting to explore in future research whether this is due to the actual workings of Italian institutions or rather mostly a (self-) image projected on these institutions.

Beyond the Italian case, the present analysis reiterates and expands our understanding of the complexity of citizenship: not only its internal and external dimensions, but also how its experiences are stratified by the profile of the citizens/applicants, and how the letter of the law and the implementation dimension interact in shaping experiences of citizenship.

Notes

1. In the interviews I collected there were other cases in which two partners showed significantly different interest in naturalization, and this was not limited to British/Italian couples (Sredanovic 2023).
2. The certificates can be obtained only from a limited number of public Italian universities (some of which subcontract the tests abroad to private entities) and from the branches of the N.G.O. Società Dante Alighieri, which promotes the Italian language abroad.
3. This can be further compared with the experiences of third-country nationals (e.g. Tuckett 2018), for whom citizenship can be challenging both for the requirements strictly speaking, and for the ways in which wider migration policies can, for example, cause interruptions in residence and therefore hinder the accumulation of ten years of residence.

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