



CMR Working Papers

141/199

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PATHWAYS TO EUROPEAN CITIZENSHIP: A COMPARATIVE CASE STUDY OF SPAIN AND POLAND

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Streszczenie. W artykule przedstawiono analizę procesów, dzięki którym obywatele państw trzecich mogą uzyskać obywatelstwo hiszpańskie lub polskie. Oba kraje Unii Europejskiej zapewniają przyspieszone procedury dla określonych grup, ale grupy te, konkretne wymogi dotyczące obywatelstwa oraz skala naturalizacji znacznie się różnią. Chociaż analiza procedur uzyskania obywatelstwa spotkała się z dużym zainteresowaniem naukowców, niewiele badań przyjmuje perspektywę porównawczą. Niniejsze badanie ma na celu wypełnienie tej luki w wiedzy poprzez zastosowanie podejścia porównawczego studium przypadku, wykorzystującego interpretacyjne i opisowe metody statystyczne, obejmujące okres od 2014 do 2023 roku. Odpowiada ono na kluczowe pytania: Jakie są prawne procedury uzyskania prawa pobytu i obywatelstwa w Hiszpanii i Polsce? Które grupy korzystają z przyspieszonych procedur i dlaczego? Jakie są podobieństwa i różnice w dostępie do obywatelstwa między tymi dwoma krajami? W badaniu analizuję przepisy prawne oraz czynniki ekonomiczne i społeczne, które wpływają na nabycie obywatelstwa w obu krajach. Kluczowe ustalenia sugerują, że wysokie wskaźniki naturalizacji w Hiszpanii są związane z uproszczonym procesem naturalizacji, z wymogiem znajomości języka na poziomie A2, zakorzenionym w silnych więzach historycznych, korzystnych dla obywateli krajów iberoamerykańskich. Z kolei znacznie niższe wskaźniki naturalizacji w Polsce przypisuje się bardziej rygorystycznym wymogom znajomości języka polskiego na poziomie B1, które stanowią poważne bariery, zwłaszcza dla osób nieznających żadnego języka słowiańskiego. Oba kraje stosują zasadę *ius sanguinis* i oferują przyspieszone procedury, takie jak obniżone wymagania dotyczące pobytu dla określonych narodowości w Hiszpanii, czy też „Karta Polaka” i nadanie obywatelstwa przez Prezydenta RP. Ostatecznie, ich odmienne podejście do integracji i znajomości języka kształtuje dostępność obywatelstwa, co prowadzi do zróżnicowanych rezultatów dla imigrantów.

Słowa kluczowe: ścieżki naturalizacji, studium przypadku porównawczego, obywatele państw trzecich, *ius sanguinis*, przyspieszona naturalizacja, powiązania historyczne i kulturowe, wymagania językowe, Karta Polaka, Hiszpania, Polska

Abstract. This working paper examines the processes by which third-country nationals can acquire Spanish or Polish citizenship. While both European Union countries provide expedited pathways for specific groups, these groups, the particular citizenship requirements, and the scale of naturalisation vary significantly. Although the analysis of citizenship pathways has received considerable academic

attention, few studies adopt a comparative perspective. This study aims to bridge that knowledge gap by employing a comparative case study approach, utilising legal interpretive and descriptive statistical methods, covering the period from 2014 to 2023. It addresses key questions: What are the legal pathways for obtaining residency and acquiring citizenship in Spain and Poland? Which groups are granted expedited processes, and why? What are the similarities and differences in access to citizenship between the two countries? The research investigates the laws and economic and social factors that influence citizenship acquisition in both nations. Key findings suggest that Spain's high naturalisation rates are linked to a simplified naturalisation process, with an A2 language requirement, rooted in strong historical ties that benefit nationals from Ibero-American countries. In contrast, Poland's significantly lower naturalisation rates are attributed to more rigorous B1-level Polish language requirements, which pose considerable barriers, especially for non-Slavic speakers. Both countries apply *ius sanguinis* and offer expedited routes, such as Spain's reduced residency requirements for specific nationalities or Poland's “Pole's Card” and presidential grants. Ultimately, their distinct approaches to integration and language proficiency shape the accessibility of citizenship, leading to varying outcomes for immigrants.

Keywords: Naturalisation Pathways, Comparative Case Study, Third-Country Nationals, *Ius Sanguinis*, Expedited Naturalisation, Historical and Cultural Ties, Language requirements, Karta Polaka, Spain, Poland

1. Introduction

For many immigrants, obtaining citizenship in their country of residence represents an ultimate goal. Citizenship, defined by a state's nationality laws, formally recognises an individual as a member of that state, establishing a legal relationship that grants specific rights and obligations (Sharp, 2023: 410). The process typically begins with acquiring legal residency, a prerequisite that varies across jurisdictions. Broadly, there are three primary pathways to citizenship: (1) birthright acquisition (based on birth in the country or parental nationality); (2) residence-based acquisition (meeting specific residency requirements); and (3) acquisition based on particular ties or attributes (such as cultural, historical, or family connections). These diverse pathways reflect different legal standards and policy objectives pursued by various countries (Van der Baaren & Vink 2021). Citizenship options can depend on an individual's place of residence or specific connections and attributes. These may include categories like education, family reunification, marriage, or skilled employment. Additionally, some groups might receive preferential treatment in citizenship acquisition based on factors like their country of origin, evolving immigration laws, and existing legal rights, which vary significantly between nations (Koopmans & Michalowski 2016). Legal complexities can arise when an immigrant's pathway to permanent residency is unclear. In such cases, limited awareness of applicable laws and regulations may cause delays in acquiring citizenship. For instance, in Spain, third-country nationals—defined as individuals who are not citizens of the European Union (European Commission, 2016)—may encounter varying naturalisation timelines depending on the specific legal pathways available to them (Gobierno de España, 2024).

While numerous studies examine pathways to citizenship within individual countries (e.g., Groarke & Dunbar, 2020; Yeoh et al., 2022; Sheares, 2022), relatively few adopt a comparative perspective (e.g., Hackl, 2022; Wolffhardt et al., 2019). The existing comparative literature often focuses on refugees and compares outcomes across fourteen different European Union member states. This research addresses that gap by specifically comparing the cases of Spain and Poland. These two countries warrant analysis for several reasons. Firstly, both have experienced a marked increase in immigration over the past decade. However, a substantial disparity in citizenship acquisitions was observed in 2023: Spain processed 240,208 cases, while Poland processed only 11,785 (Eurostat, 2025a). Secondly, the historical development and legal processes for acquiring citizenship in each country have evolved distinctly, with each implementing its own legislative reforms. Consequently, it is essential to examine these

citizenship pathways within the broader framework of European Union laws and regulations, understanding both national variations and their alignment with supranational norms.

This comparative case study aims to assess which country offers more favourable conditions and regulations for acquiring citizenship and for which categories of applicants. It provides a detailed, step-by-step analysis of the process, from obtaining residency to gaining citizenship. The study identifies key similarities and differences between Spain and Poland and investigates the underlying reasons for Spain's higher number of citizenship acquisitions. Ultimately, this evaluation maps the factors that shape the various pathways to citizenship in both countries. Given the implications of their non-EU citizenship status and specific legal provisions, the review primarily focuses on third-country nationals, as they represent a substantial proportion of citizenship acquisitions and are often subject to distinct legal treatment.

2. Context on migration to Spain and Poland

2.1. Spain

The economic boom of Spain's "Golden Era" (1998–2008) marked a pivotal period for migration in the 21st century. During this time, Spain's economy and labour market expanded rapidly, creating a strong demand for migrant workers. Spain's earlier accession to the Schengen Area facilitated the free movement of people, and the adoption of the euro in 1999 further integrated the country into the European economy (Banco de España, n.d.).

Increased immigration led to a significant demographic shift, with major cities experiencing a substantial rise in immigrants seeking economic stability (Ortega, 2009). However, as Parreño-Castellano et al. (2021) highlight, these changes were uneven across regions and shaped by the diverse ethnic backgrounds of third-country nationals. The largest migrant groups included Moroccans, Ecuadorians, and Colombians, followed by migrants from other European Union countries, Africa, and Asia. Koopmans and Michalowski (2016) note that immigrants from Spain's former colonies benefited from certain privileges, such as shorter naturalisation periods and the ability to retain their original citizenship, compared to migrants from countries without historical ties.

In the late 1990s, Spain strategically shaped its social and political landscape and foreign policy towards Ibero-America and the Mediterranean to safeguard national interests related to citizenship acquisition (Sorroza Blanco, 2014). These internal policies, coupled with evolving

dynamics within Spanish society, made Spain an attractive destination during the late 20th and early 21st centuries. This period of relative stability, however, was short-lived, culminating in the financial crisis that struck the Eurozone in 2008 (Neal, García-Iglesias, 2013).

Between 1998 and 2008, the number of immigrants in Spain surged dramatically, rising from 637,085 (Instituto Nacional de Estadística, 2016) to 5.2 million (Martín & Palma, 2010). This rapid increase marked the beginning of a new migration wave to Europe, propelled by Spain's economic growth, its accessible immigration pathways post-September 11, and geopolitical shifts that positioned Spain as a promising destination (Pellegrino, 2004: 40). Among the diverse migrant groups arriving, a growing but relatively small proportion live undocumented or in irregular conditions. In 2023, 63,970 cases of undocumented status or invalid visas were recorded (Ministerio del Interior, 2024), with many individuals attempting to regularise their status after arrival. During the same year, 206,151 people entered Spain holding a National (D-type) Visa (Observatorio Permanente de la Inmigración, 2024).

The D visa permits individuals to stay in Spain for more than 90 days within any 180 days for purposes such as employment, study, or establishing residence (Ministerio de Asuntos Exteriores, Unión Europea y Cooperación, n.d.). In 2023, the primary reasons for issuing National Visas were studies (42%), family reunification (25%), employment (19%), establishment of residence (12%), and other purposes (2%) (Observatorio Permanente de la Inmigración, 2024). Holding a D visa does not limit the legal pathways available for obtaining residency in Spain; these pathways vary in complexity and may ultimately lead to Spanish citizenship. Consistent with Parreño-Castellano et al. (2021), Spain demonstrates a demographic trend where certain third-country nationals migrate to specific regions, underscoring migration's pivotal role in revitalising and transforming rural and metropolitan areas, leading to significant economic and demographic shifts.

2.2. Poland

Poland's immigration history in the post-1989 period, following the collapse of Communism, is more recent than Spain's, but it has been similarly shaped by its accession to the European Union in 2004 and entry into the Schengen Zone in 2007. These developments have served as catalysts for both emigration from and immigration to Poland (Olbrycht, 2020). Poland's EU accession and Schengen entry initially increased emigration but gradually encouraged immigration (Komornicki et al., 2024). During the 2010s, the number of first residence permits

issued in Poland nearly doubled, rising from 89,269 in 2013 to 175,952 in 2022—a 97.10% increase, excluding irregular migration cases (Eurostat, 2024b). This growth in third-country nationals working in Poland reflects the country’s economic expansion, its increasing attractiveness to migrants, and a steady rise in applications for Polish citizenship (Statistics Poland, 2024).

Consequently, Polish society has been transforming from an ethnically homogeneous population into a more diverse one. However, the development of adequate immigrant infrastructure, including integration policies, has not yet matched this social transformation (White, 2018). The topic of Poland as an immigration destination for people with diverse cultural and linguistic backgrounds was absent from public and political discourse until the 2015 European refugee reception crisis. Since then, political figures have incorporated anti-immigration rhetoric into their electoral campaigns, positioning Poland as a potential testing ground for challenges to multicultural and multiethnic societies (White, 2018). Like many countries in Central and Eastern Europe, Poland gradually developed its integration and immigration policies to address labour market shortages, facilitating the arrival of third-country national workers and establishing pathways to permanent residence. The new EU immigration plan for 2025–2030 aims to enhance policy frameworks by introducing updated requirements and legislation (European Commission, 2024).

The outbreak of the war in Ukraine in 2022 coincided with an important turning point for immigration to Poland. The country’s role in Europe and globally has evolved, positioning Poland as a new key destination for migrants (Kaczmarczyk & Duszczyk 2022). Between February and April 2022 alone, approximately three million Ukrainian nationals fled to Poland. By 2025, less than a million Ukrainians displaced by the war remained in the country (Service of the Republic of Poland, 2025).

Over the years, Poland has actively enhanced its migration and integration systems to facilitate its transition from a traditionally emigration country to a new immigration destination. This shift is reflected in residence permit statistics, with a strong focus on employment. In 2023, the primary grounds for residence permits issued to migrants were employment (427,162 cases), followed by other reasons (165,442 cases), education (30,926 cases), and family reunification (19,259 cases), totalling 642,789 permits granted (Eurostat, 2024a). By comparison, the peak year of 2021 saw a higher total of 967,345 residence permits issued (Eurostat, 2024a).

Currently, Poland is entering a second phase of migration, where factors such as economic growth, demographic changes, and evolving integration policies are expected to play a key role in shaping its position within broader migration dynamics (White, 2018). Poland has demonstrated an ability to adapt its immigration framework, including reforms to the legal requirements for obtaining permanent residence. These measures have been strategically implemented as part of a broader political approach aimed at managing immigration by selectively attracting and admitting individuals who align with the country's economic and social priorities (Główny Urząd Statystyczny, 2024). Thus, Poland exhibits nearly all the characteristics of an immigrant destination country (Duszczyk et al., 2024). Its ageing population and shifting demographics contribute to this evolving status. Migration flows are expected to remain steady, reflecting social and economic disparities in migrants' countries of origin. Moreover, ongoing cyclical and seasonal economic migration continues to shape these patterns (Czaika & Reinprecht, 2022).

3. Research Methods

This study employs a comparative case study design (Yin, 2017), treating each selected country as an individual case. Spain and Poland were chosen due to their significant immigration regulations, distinct societal compositions, and Poland's recent emergence as an immigration destination. The research draws on existing sources, including: (1) academic literature, (2) legal frameworks, and (3) EU and national statistical data, to identify and compare the pathways available for third-country nationals to acquire citizenship in both countries.

The analysis covers the period from 2014 to 2023. The starting point, 2014, was selected because migration became a central issue on the European public and political agenda following the onset of the European refugee reception crisis. This time frame is particularly relevant for evaluating how governments responded to the crisis, especially in terms of balancing migration management with national security concerns (FitzGerald, 2019).

3.1. Data sources

Legal acts, selected for analysis, include those which determine paths to citizenship as of 2024 in Spain and Poland. That includes:

Table 1. Legal acts included in the analysis

Spain	Poland
<ul style="list-style-type: none"> ● The Civil Code – Establishing the fundamental principles of nationality and naturalisation. (Real Decreto de 24 de julio de 1889, 2023) ● Organic Law 4/2000 – Regulating immigration, integration, and residency conditions.(Real Decreto 4/2000, 2000) ● Decree 14/1958 – Addressing historical provisions on nationality. (Decreto de 14 de noviembre de 1958, 1958) ● Decree 1155/2024 – The most recent reform, introducing key changes to immigration and nationality procedures. (Real Decreto 1155/2024, 2024) ● Royal Decree 1004/2015 - integration policies via language and knowledge of sociocultural topics of Spain (Real Decreto 1004/2015, 2015) ● Spanish Constitution (1978) 	<ul style="list-style-type: none"> ● Act on the Polish Citizenship (Dz.U. 2012 item 161) ● Act on Repatriation (Dz.U. 2000 nr 106 item 1118) ● Act on Foreigners (Dz.U. 2013 item 1650) ● Constitution of the Republic of Poland (Dz. U. 1997 r. Nr 78, item 483)

Source: Own elaboration

Other secondary data sources used in this thesis include:

- Governmental Reports: Official reports from Spain and Poland’s national agencies engaged in immigration.
- EU reports related to migration.
- EUROSTAT data on naturalisation.
- National Statistical sources: from Instituto Nacional de Estadística (INE) and the National Statistical Office in Poland.

3.2. Data analysis

The gathered legal documents are examined using a critical legal framework (Ingleby & Johnstone 2020), which analyses how differences in laws impact the routes to citizenship by altering official requirements and conditions. This approach allows the analysis to delve beyond

the surface of legal procedures and scrutinise who is deemed deserving of citizenship, as well as the normative assumptions and values embedded within the laws. In addition, statistical data—comprising Eurostat figures on citizenship acquisition alongside national statistical resources from Spain and Poland—are examined using basic descriptive statistical methods to identify trends and patterns.

4. Scale of naturalisation in Spain and Poland

Both Spain and Poland have transitioned from emigration to immigration countries, albeit at different points in time (Martín & Palma 2010). Geopolitical realignments following the Cold War, combined with their accession to the European Union (Spain in 1986 and Poland in 2004), ushered in a new phase of intra-EU migration (Olbrycht, 2020). These developments have also supported the evolution of legal and theoretical frameworks on citizenship, aiming to create more streamlined and accessible pathways for acquisition thereof (Duarte de Carvalho, 2019). Migration in both countries has become a significant focus of academic inquiry (White, 2018; Parreño-Castellano et al., 2021). While Spain has been extensively studied in migration literature, with Ibero-American third-country nationals being the top groups acquiring Spanish citizenship (Instituto Nacional de Estadística, 2024), Poland remains underrepresented in international discourse (Ślęzak & Bielewska 2021).

Immigration to Spain, unlike Poland, has long historical roots, with migrants leveraging linguistic affinities alongside employment opportunities, education, or family reunification (such as marriage) toward acquiring Spanish citizenship (Biernacka, 2018). In this context, Moroccan nationals applying for Spanish citizenship while retaining their original nationality navigate the complexities of Spain's legal provisions on dual nationality (Instituto Nacional de Estadística, 2024a, UNHCR, 1958). This issue is more nuanced than it initially appears, warranting further legal analysis to address existing practical realities of de facto dual nationality. Despite these complexities, Spain remains one of the primary destination countries for Moroccans.

The process of acquiring citizenship in Poland shares some similarities with Spain, particularly concerning linguistic, historical, and cultural considerations. Poland receives diverse immigrant groups from neighbouring countries such as Ukraine, Belarus, and, to a lesser extent, Russia (Główny Urząd Statystyczny, 2024). These migration patterns are deeply rooted in Poland's historical relations with these countries (Ministry of Foreign Affairs, Republic of Poland, 2022),

with each reflecting distinct historical trajectories that continue to shape the contemporary migration and naturalisation landscape.

As a crucial element of societal integration, language proficiency represents a fundamental requirement, playing a vital role in securing employment, effective communication, and fulfilling the legal criteria necessary for obtaining permanent residence and citizenship (Polish Office for Foreigners, 2023). For immigrants from non-Slavic-speaking backgrounds, achieving the required level of Polish language proficiency for permanent residency or naturalisation presents substantial difficulties. In contrast, Ukrainians, Belarusians, and Russians benefit from a notable advantage due to linguistic similarities, which make learning Polish more accessible despite existing differences among these languages (Polish Office for Foreigners, 2023). Unlike Spain, Poland does not receive a high volume of citizenship applications (Główny Urząd Statystyczny, 2024); however, this trend has remained relatively stable over time. Forecasts suggest that Poland will continue its transformation into an immigration-receiving country in the coming decades (Kaczmarczyk & Duszczyk 2022).

From the standpoint of economic and social priorities, both countries exercise their sovereign rights to establish language proficiency as a fundamental requirement in their immigration and naturalisation processes. However, notable differences exist between the two systems. In Spain, the required level of language proficiency is lower than that imposed by Polish authorities (Instituto Cervantes, 2025). This disparity may influence the nationalities of third-country nationals who successfully acquire citizenship in each country. The lower linguistic threshold in Spain makes naturalisation more accessible for certain applicants, while Poland's stricter language requirements may act as a significant barrier—or a selective filtering mechanism—for specific migrant groups pursuing citizenship.

Both Spain and Poland have enacted legal provisions, along with specified exceptions, that allow for expedited pathways to citizenship under comparable categories. In Poland, an accelerated naturalisation process is available under the Repatriation Act, which permits individuals of Polish descent to apply for citizenship through a simplified procedure. This process involves obtaining a Polish Card (Karta Polaka) and can be completed in as little as one year (Ministry of Foreign Affairs, Republic of Poland, 2022). The Repatriation Act, although it has specific rules and exceptions, provides a legal mechanism to assist individuals with proven Polish ancestry in becoming citizens.

Spain's expedited naturalisation framework is based on the Civil Code, Article 22, (Ministerio de la presidencia, justicia y relaciones con las cortes, 2023). While the general requirement for Spanish citizenship is ten years of lawful residence, Article 22 allows specific groups to apply after only two years of continuous legal residence. This expedited two-year pathway is specifically reserved for third-country nationals who are: Nationals of Ibero-American countries, Andorra, the Philippines, or Equatorial Guinea. As a strategic political choice rooted in Spain's colonial past. It is designed to facilitate the integration of specific diasporic communities that share strong historical ties, cultural proximity, and linguistic affinities (shared language) with Spain.

The impact of legal provisions on acquiring permanent residence and citizenship cannot be simply categorised as positive or negative; instead, it depends on how these laws are implemented and the specific eligibility criteria and requirements imposed. Spain's legal framework—encompassing the Civil Code, various organic laws, and royal decrees—and Poland's corresponding system—rooted in a series of legislative Acts—illustrate key structural and procedural differences that influence these pathways.

As with any citizenship acquisition process, obtaining citizenship in either Spain or Poland is neither inherently straightforward nor complex; success depends on meeting each country's specific legal requirements and regulations. Spain may provide more favourable conditions for certain third-country nationals, while Poland's framework might better accommodate others, highlighting the relative nature of accessibility. Consequently, naturalisation rates in Poland are influenced by political, economic, and social factors in neighbouring countries and can fluctuate with shifts in international relations and domestic political agendas.

Spain exhibits significant patterns in its data, including a notable spike in 2017 (Instituto Nacional de Estadística, 2024a), linked to the ongoing effects of the 2015 European migration crisis. Despite this irregularity, Spain continues to report one of the highest citizenship acquisitions rates among European Union member states (Eurostat, 2024a). However, this trend is not guaranteed to persist, and Spain could face socio-economic repercussions if migration patterns shift or if its immigration and naturalisation policies undergo substantial reform.

5. Statistics

To establish a rigorous comparative framework, this analysis utilizes three distinct metrics: (i) the level of acquisitions, which denotes the absolute number of people who obtained

citizenship; (ii) the acquisition rate, defined as the number of acquisitions per resident non-citizens; and (iii) the EU share, representing the country’s share of total EU acquisitions.

The primary findings indicate that Spain remains a leading European Union member state in granting citizenship. In 2023, Spain maintained a 22.9% EU share with an acquisition rate of 5.25%. In contrast, the naturalization figures for Poland are substantially lower, reflecting an acquisition rate of 2.87% and an EU share of 1.12% in the same year.

The level of acquisitions in Spain has demonstrated a steady upward trend since 2017, culminating in 240,208 new citizens in 2023. This data is derived from Eurostat (2025a), Table Code: migr_acqs__custom_15798834, extracted 15.03.2025. During the same period, the level of acquisitions in Poland rose from 3,700 in 2016 to 11,785 in 2023, according to data from Główny Urząd Statystyczny (2024), extracted 15.03.2025.

The leading nationalities acquiring citizenship in 2023 reflect the distinct geopolitical and historical ties of each host country. In Spain, the level of acquisitions was dominated by nationals from Morocco (54,027), Venezuela (30,154), and Colombia (18,738). In Poland, the level of acquisitions primarily comprised Ukrainians (5,577), Belarusians (4,466), and Russians (597)

Table 2. Top five previous nationalities by level of acquisitions (2023)

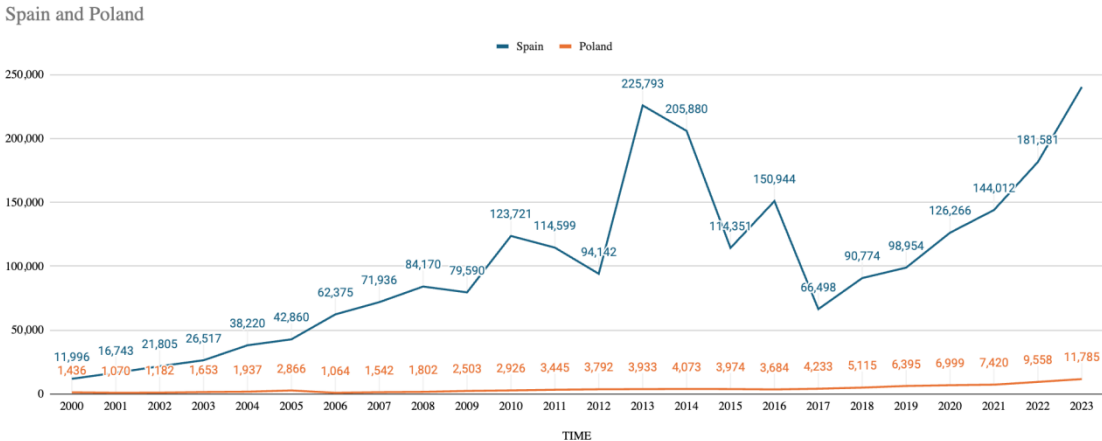
Country	1 st place	2 nd place	3 rd place	4 th place	5 th place	Total top five countries citizenship acquisitions in 2023
Spain	Morocco 54.027	Venezuela 30.154	Colombia 18.738	Ecuador 11.326	Honduras 11.189	125.434
Poland	Ukraine 5.577	Belarus 4.466	Russia 597	Vietnam 256	Germany 139	11035

Source: own elaboration based on Instituto Nacional de Estadística (2024a) and Główny Urząd Statystyczny (2024), the rates of applications in both countries, Spain and Poland.

The tendency of Moroccans applying for Spanish citizenship is linked to Ceuta and Melilla—primary Spanish enclaves in Morocco—as well as historical and immigration ties between the two countries. Colombia and Venezuela have maintained historical ties with Spain since

colonial times, and the process of obtaining Spanish citizenship is shorter and easier for their nationals (Instituto Nacional de Estadística, 2024a). Proximity, as well as cultural and historical ties, are key factors in acquiring Spanish citizenship. As long as Article 22 of the Civil Code remains in force, third-country nationals from Ibero-American countries will likely continue to choose Spain as their primary destination for naturalisation (Finotelli & Rincken 2023).

Chart 1. Level of acquisitions in Spain and Poland, 2000-2023



Source: Own calculations based on Eurostat (2025a), Acquisition of citizenship by age group, sex and former citizenship;
 (1) Based on Eurostat (2025a), Instituto Nacional de Estadística (2024a) and Główny Urząd Statystyczny (2024), the rates of applications in both countries, Spain and Poland;
 (2) Based on information of Sekretariat Państwowej Komisji do spraw Poświadczenia Znajomości Języka Polskiego jako Obcego (2025) and Instituto Cervantes (2025)
 (3) Based on legal acts and governmental ministries (Dziennik Ustaw, 2024; Strona główna Sejmu Rzeczypospolitej Polskiej, 2022; Urząd do Spraw Cudzoziemców, 2024; Ministerio de la presidencia, justicia y relaciones con las cortes, 2023b; Ministerio de la presidencia, justicia y relaciones con las cortes, 2024; Ministerio de la presidencia, justicia y relaciones con las cortes, 1958; Ministerio de la presidencia, justicia y relaciones con las cortes, 2024a; Ministerio de la presidencia, justicia y relaciones con las cortes, 2015b)

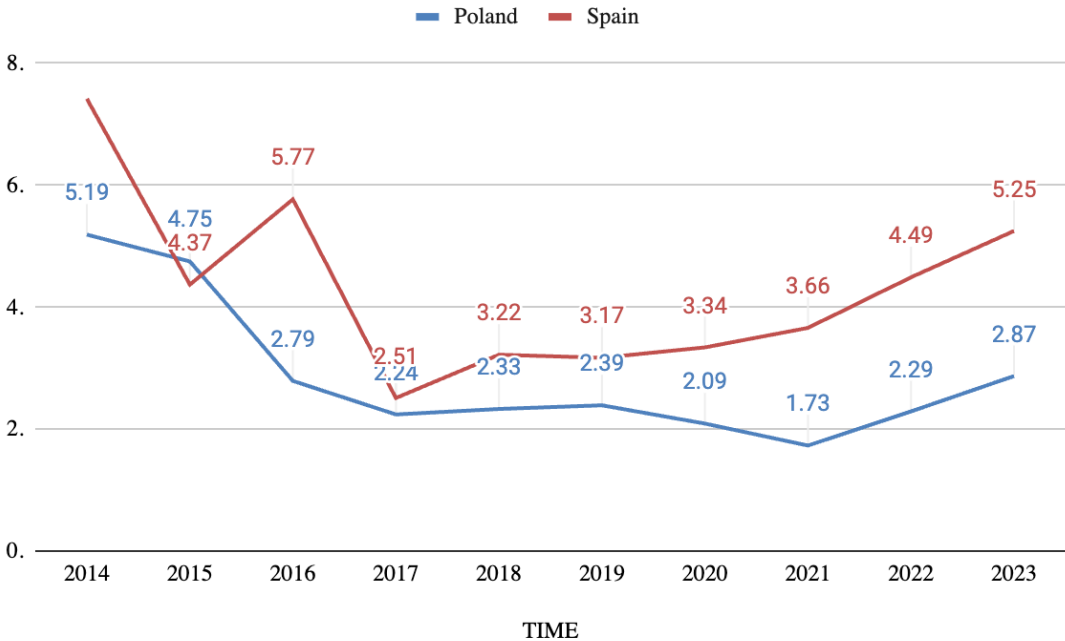
The citizenship acquisitions have been rising in Spain during the period 2014–2023. In fact, it started in 2013 with 205,880 cases, and by 2023, there were 240,208 new citizenship acquisitions (Eurostat, 2025a). The decade witnessed a decrease in 2017, with 66,498 acquisitions. Despite this decline in that particular year, Spain has made significant contributions to the overall citizenship acquisition rates and holds a considerable percentage of the total in the European Union.

The acquisition rates in Spain and Poland show significant variation over time (see Chart 2). Between 2014 and 2017, Spain experienced a drop in its acquisition rate from 7.42% to 2.51%, before rebounding to 5.25% in 2023. This data is sourced from Eurostat (2025a), Table Code: migr_acqs_custom_15798834.

In Poland, the acquisition rate between 2014 and 2023 showed a consistent range with minimal variation, though a significant peak was recorded in 2014 when the acquisition rate reached 5.19%. By 2021, the acquisition rate was 1.73%, eventually rising to 2.87% in 2023. These figures are validated against Eurostat (2025a), Table Code: migr_acqs__custom_15798834, extracted 15.03.2025.

The rates of granting citizenship in Spain and Poland vary (see Chart 2). Spain, between 2014 and 2017, showed a rate drop from 7.42 to 2.51, then increased to reach 5.25 in 2023 (Eurostat, 2025a). The decrease can be attributed to governmental initiatives aimed at attracting skilled migrants, which were implemented as part of a broader strategy for economic recovery (Hooper, 2019).

Chart 2. Acquisition rate (share of resident non-citizens) in Spain and Poland, 2014-2023



Source: based on Eurostat (2025b), Table Code: migr_acqs__custom_15798834

Nationals from other Ibero-American countries constitute a significant number of acquisition for Spanish citizenship, including Ecuador (11,326), Honduras (11,189), the Dominican Republic (10,275), and Cuba (9,790), among others (Instituto Nacional de Estadística, 2024a).

In Poland, the naturalisation rate reflects the country's migration policies and legal requirements for the acquisition of citizenship (Wach & Okólski 2020). In 2014, Poland recorded a total of 4,073 acquisitions for citizenship, which increased to 11,785 by the end of 2023 (Eurostat, 2025a). This upward trend demonstrates the ongoing evolution of immigration legislation and Poland's emerging role as a prospective destination for immigrants. When these numbers are converted into percentages, Poland's acquisitions rates between 2014 and 2023 show a consistent range with minimal variation over the years.

For instance, in 2021, the rate was 1.73%. During this period, rates fluctuated between 2.09% and 2.87%, with the latter observed in 2023 (Eurostat, 2025a). There was a significant peak in 2014, when the rate reached 5.19% (Eurostat, 2025a). This sharp rise raises important questions about the underlying factors—the role of political shifts or policymaking decisions—influencing these fluctuations. One of the most significant developments since February 2022 is the implementation of Temporary Protection Status (TPS) for Ukrainians, stateless individuals, and individuals granted refugee status before 24 February 2022 (European Union Agency for Asylum, 2022). Although the number of TPS holders in Poland has increased, this status does not provide a direct pathway to citizenship. Nevertheless, there were 994,790 TPS applications in Poland—accounting for 23.1% of the total applications across the EU (Eurostat, 2025c). This figure may eventually influence citizenship statistics, either through future policy adaptations or as an indication of a growing population under temporary protection within the country (Eurostat, 2025c).

The tendency is toward citizenship acquisitions by Ukrainians, Belarusians, and Russian. Although these individuals are often referred to as “third-country nationals” in EU terminology, they are European by geography, and their historical, cultural, and geographical ties to Poland distinguish them from others. In 2023, Ukrainians led in acquiring Polish citizenship with 5,577 acquisitions, followed by Belarusians with 4,466, and Russians with 597 (Główny Urząd Statystyczny, 2024). This trend has remained steady since 2015, demonstrating a consistent pattern in citizenship and demographics. In contrast, other nationalities, such as Lebanese (3 acquisitions), Jordanians (4), and stateless individuals (5), recorded the lowest number of acquisitions in 2023 (Główny Urząd Statystyczny, 2024).

The number of acquisitions for Polish citizenship is surprisingly low. One key factor contributing to the shortage may be the legal requirement to demonstrate B1-level proficiency in the Polish language, which can present a significant barrier for many applicants. On the other hand, individuals from countries that were once part of the Polish-Lithuanian Commonwealth often share historical, cultural, and linguistic ties with Poland. The combination of these connections and Poland’s relative economic stability is one of the primary reasons that nationals from these regions submit the highest number of citizenship applications (Vorotnikov & Habarta 2021).

In conclusion, both Spain and Poland exhibit varying numbers of third-country nationals acquiring citizenship through multiple pathways, ranging from transitions from temporary or permanent residence to citizenship via marriage, possession of the Polish Card, or other legally recognised routes. Regardless of the country, all applicants must fulfil the eligibility criteria set by national authorities to qualify for citizenship. These figures remain dynamic, subject to annual fluctuations shaped by numerous factors, with the applicant’s country of previous citizenship being particularly influential. Historical ties, geographic proximity, and shared cultural contexts often determine migration flows and naturalisation

applications, underscoring the complex connection between migration trends and citizenship acquisition.

6. Paths to citizenship

6.1 Spain

Spain's immigration policies enable third-country nationals to acquire Spanish citizenship within a period ranging from one to ten years. The exact timeframe depends on various factors, including the applicant's country of origin, the legal pathway pursued, length of legal residence, immigration status, and other relevant conditions.

The process typically begins with the issuance of a long-stay D visa (National Visa), which grants entry into Spain for purposes such as studies, employment (including self-employment, dependent employment, digital nomad status, or entrepreneurship), or non-lucrative residence. This process is outlined in Royal Decree 1155/2024, specifically Articles 61-64 (Ministerio de la Presidencia, Justicia y Relaciones con las Cortes, 2024). The D visa is granted upon application for stays exceeding six months and is issued for a period of up to one year. This visa marks the official commencement of the legal residency process in Spain. It allows the holder to enter Spain for a stay longer than 90 days, enabling them to apply for a residence permit valid for up to three years, depending on the specific application type. This permit must be renewed periodically before its expiration, as stipulated in the mentioned article (Ministerio de la Presidencia, Justicia y Relaciones con las Cortes, 2024).

The general period required for Spanish citizenship ranges from five to ten years of legal residence. This typically involves five years of temporary residence, after which an individual becomes eligible to apply for permanent residence, followed by an additional five years before they can apply for citizenship. However, the required residence period is reduced to five years for individuals granted refugee status. In contrast, a ten-year residence period applies to third-country nationals who do not qualify for any legally established exceptions. The typical pathway to Spanish citizenship involves the following stages and estimated timeframes:

- D Visa – 1 year: Grants initial legal entry and stay for purposes such as study, employment, or family reasons.
- Temporary Residence Permit (including study and work permits) – up to 5 years: Renewable on an annual or biannual basis.
- Permanent Residence Permit: Requires five years of continuous legal residence in Spain.
- Spanish Citizenship: Available after ten years of lawful residence, with exceptions for specific groups.

According to Article 23 of the Spanish Civil Code, individuals seeking to naturalize as Spanish citizens are generally required to renounce their previous citizenship. However, a practical conflict of laws concerning Moroccan nationals, as Moroccan law does not permit its citizens to renounce their nationality (National Legislative Bodies/National Authorities, 2007). This refers to a significant legal contradiction and practical conflict of laws that arises when Moroccan nationals acquire Spanish citizenship. It represents a "de facto" dual nationality situation that exists despite the formal requirements of Spanish law (Reina, 2023).

Organic Law 4/2000 (Ministerio de la presidencia, justicia y relaciones con las cortes, 2000) constitutes the primary legislation regulating immigration in Spain, encompassing laws, policies, procedures, and the integration of immigrants into Spanish society. Its implementation has influenced immigration dynamics, contributing to notable increases in both the number of new immigrants and citizenship acquisitions within the broader European Union context. The Decree of 14 November 1958, which regulates the Civil Registry, established the procedural framework for citizenship application. This decree governs essential matters, including nationality, marriage registration, official documentation, and certifications (Ministerio de la presidencia, justicia y relaciones con las cortes, 1958). In practice, this decree often poses challenges for new citizenship acquirers regarding the identification of the appropriate registry office and the required documentation. These difficulties stem from a lack of procedural clarity concerning the steps to be followed after submitting the initial application, as well as the administrative procedures involved in the formal registration and legal recognition of newly naturalised citizens (Salas de Murillo, 2014).

The recently enacted Royal Decree 1155/2024, is identified as the most recent legislative reform aimed at restructuring immigration and nationality procedures in Spain. Approved on November 19, 2024, it serves as the new regulation for Organic Law 4/2000, which is the primary legislation governing the rights and freedoms of foreigners in Spain. These changes have reformed the initial stages of legal residency, which is the prerequisite for eventual citizenship, including; asylees rights, and eligibility criteria for work permits, D-type visas, and work permit eligibility among others.

Civic requirements

In Spain, the civic requirements for naturalisation include the following:

- Police clearance certificates from both the applicant's country of origin (legalised or apostilled) and from the Spanish authorities.
- A valid residence permit.
- Demonstrated proficiency in the Spanish language.
- Stable and sufficient financial means to support oneself.
- Valid health insurance coverage.
- A certified birth certificate, legalised or apostilled as appropriate.

- Successful completion of the Constitutional and Sociocultural Knowledge of Spain (CCSE) examination.

Under Royal Decree 1004/2015, the requirements for naturalization involve a specific combination of linguistic, sociocultural, and administrative standards. Understanding the nuances of these rules is critical because exceptions for certain groups often lead to confusion regarding which exams and documents are actually necessary. First off, Language Proficiency (The DELE Exam) Spain requires a standardized level of language proficiency for most third-country nationals must generally demonstrate a minimum of A2 level proficiency in the Spanish language. On the other hand, Nationals of Ibero-American countries are exempted from the DELE examination due to strong historical and linguistic ties with Spain. This is a major factor in Spain's high naturalization rates compared to countries like Poland.

Second, Sociocultural Knowledge (The CCSE Exam) Unlike the language exam, the civic knowledge requirement has fewer exemptions. All applicants must demonstrate knowledge of Spain's constitutional, cultural, social, and political systems. This is tested via the CCSE (Conocimientos Constitucionales y Socioculturales de España) examination, also managed by the Instituto Cervantes. And even though these nationals skip the language exam (DELE), they are still required to take the CCSE exam unless they have completed their formal education within Spain. (Ministerio de la presidencia, justicia y relaciones con las cortes, 2015a).

An example of the complexities surrounding the naturalisation process is the significant number of individuals who legally enter Spain with valid passports but overstay the 90-day visa-free period, subsequently falling into irregular or undocumented status. In 2024 alone, Spanish authorities recorded 60,216 irregular third-country nationals (Ministerio del Interior, 2024), a figure exceeding the total number of citizenship acquisitions by Colombians and Venezuelans combined. This data underscores the ongoing challenges in adhering to the formal citizenship acquisition process. While some of these individuals eventually leave, many remain in Spain and explore legal pathways to regularise their status as a step toward eventual citizenship acquisition.

Expedited Path to Spanish Citizenship

Spain's expedited naturalisation framework is based on the colonial history, linguistic proximity and to some extent to facilitate the integration of specific diasporic communities. As mentioned before, Spanish citizenship can be granted after just two years of continuous legal residence if they are nationals of an Ibero-American country (...) According to Civil Code, Article 22, (Ministerio de la presidencia, justicia y relaciones con las cortes, 2023). Moreover, while Article 22 sets the two-year standard for these groups, other laws can reduce the requirement even further. For example, Organic Law 4/2000 reduces the residency requirement to just one year for those married to a Spanish citizen

6.2 Poland

The acquisition of Polish citizenship by third-country nationals involves extensive procedures and requirements, with a timeframe ranging from 1 to 10 years. The path to citizenship typically begins with obtaining a national type D visa, followed by applying for a temporary residence permit upon arrival in Poland and scheduling an appointment for document submission (Mazowiecki Urząd Wojewódzki, n.d.). The category of this permit depends on the individual's reason for staying, such as studies, employment, or family reunification. This marks the first formal step toward eventual citizenship. The temporary residence permit is granted for a duration ranging from one to three years, with the possibility of extension, provided the applicant continues to meet the original conditions (e.g., ongoing studies, employment, or maintaining family ties) (Mazowiecki Urząd Wojewódzki, n.d.).

After five years of legal and continuous residence, third-country nationals may become eligible to apply for permanent residence. This status is also granted under specific conditions, including being the spouse of a Polish citizen, having Polish origins, receiving asylum or refugee status, being a Pole's Card holder, or being a recognised victim of human trafficking, among others.

Individuals who do not meet the specific criteria for permanent residence may still be eligible to apply for the EU long-term residence permit. This permit is available to other categories of immigrants who have lawfully resided in Poland for an extended period. Although a type of permanent residence, it is specifically termed "long-term EU residence" and can be granted if the person meets basic requirements: living in Poland for five years without interruption, having a steady income, possessing valid health insurance, and providing proof of accommodation (Mazowiecki Urząd Wojewódzki, n.d.). Additionally, as part of the application process for either permanent residency or the long-term EU residence permit, the applicant must demonstrate proficiency in the Polish language at the B1 level (Mazowiecki Urząd Wojewódzki, n.d.).

Poland, along with other EU countries such as Austria (Austria, 2006), Hungary (Hungarian Citizenship Act, 2024), France (France, 1993, art. 21-19), and Italy (Italy, 2018), offers the option of citizenship acquisition through a presidential decree. This process involves an executive order issued by the President of the Republic of Poland. The decision to grant citizenship through this pathway is made at the President's sole discretion, and the individual chosen becomes the beneficiary of the grant according to Article 18, "Prezydent Rzeczypospolitej Polskiej może nadać cudzoziemcowi obywatelstwo polskie" (Act on the Polish Citizenship). This process has specific procedural characteristics: an expression of interest must be submitted through a consular representative office or the provincial governor. The Office of the President then receives the request for evaluation and determination, which could take an indefinite period. While the law does not specify the reasons for granting citizenship, it has often been awarded based on various ties to Poland, including those of athletes or other considerations of national interest.

The most common methods of acquiring Polish citizenship are through: (1) recognition as a Polish citizen, (2) presidential grant, and (3) the restoration of citizenship (Główny Urząd Statystyczny, 2024: 473). In 2023, there were 11,785 cases of Polish citizenship acquisition, a significant increase compared to 4,435 cases in 2015 and 7,507 in 2020 (Główny Urząd Statystyczny, 2024: 473). In contrast, 381,506 applications for the Pole's Card were submitted between 2008 and 2023; 23,107 Pole's Cards were granted in 2015, increasing to 25,748 in 2023

Civic requirements

The statutory requirements for obtaining permanent residence or Polish citizenship include the following:

- Proficiency in the Polish language at the B1 level.
- Legally documented period of residence in Poland.
- Stable and regular financial means.
- Certificate of no criminal record from both the country of origin and the Polish authorities.
- Valid health insurance coverage.
- Proof of accommodation.

The presentation of Polish language proficiency at a level of at least B1 is a major challenge for third-country nationals seeking a permanent residency card, which is a crucial step in continuing the citizenship process (Urząd do Spraw Cudzoziemców, 2023). While there is no specific format required for the Polish language proficiency exam, it is designed to assess comprehensive language skills, including speaking, listening, reading, and writing. The cost of the exam varies depending on the proficiency level and the age group (e.g., €90 for A1–A2 level adults; €120 for B1–B2 level adults; €150 for C1–C2 level adults; €180) (Sekretariat Państwowej Komisji do spraw Poświadczania Znajomości Języka Polskiego jako Obcego, 2025).

Under Polish law, there are certain exceptions to the language proficiency requirement for minor applicants. Additionally, third-country nationals who are married to Polish citizens may benefit from an expedited path to citizenship, as the required period of permanent residence is reduced to two years in such cases. As outlined in the Act on the Polish Citizenship, Articles 30(1) and 30(2) specify the conditions and procedures for expedited citizenship applications, detailing who qualifies and the criteria for benefiting from a shortened residency requirement and other procedural advantages.

A third-country national may be recognized as a Polish citizen if they meet conditions such as continuous residence in Poland for at least three years under a settlement permit or a long-term EU resident permit, possession of a stable and regular source of income, and a legal title to occupy residential property in Poland (Mazowiecki Urząd Wojewódzki, n.d.). Eligibility based on two years of continuous residency requires that the individual has resided in Poland for at least two years under a settlement permit, long-

term EU residence permit, or permanent residence card, and must either have been married to a Polish citizen for at least three years or be stateless (Mazowiecki Urząd Wojewódzki, n.d.).

Some third-country nationals face challenges regarding the language proficiency requirements established by the Minister of the Interior and Administration. These requirements may confine migrants to a cycle of temporary residence renewals, hindering their ability to obtain permanent residence and citizenship (Urząd do Spraw Cudzoziemców, 2023). Even with a stable work history or a diploma from a Polish university, language proficiency often remains a barrier to naturalization.

Expedited Path to Polish Citizenship

An expedited pathway to Polish citizenship is the Pole's Card, regulated by the Act on Repatriation of November 9, 2000. The conditions to acquire it are:

- Demonstrable descent from Polish parents, grandparents, or great-grandparents.
- Active involvement in Polish cultural activities for at least three years.
- Basic knowledge of the Polish language and cultural customs verified with a personal interview conducted at Polish consulate or voivodeship office (Strona Główna Sejmu Rzeczypospolitej Polskiej, 2022).

The Act on Repatriation clarifies the process and explains why Polish descendants, principally those expelled from Poland, are prioritised when acquiring citizenship. Its primary objective is to facilitate the repatriation of individuals of Polish descent residing in former Soviet countries and to naturalise Polish descendants who were stateless or deported (Strona Główna Sejmu Rzeczypospolitej Polskiej, 2022). Individuals who meet the specified requirements for the Pole's Card are eligible for certain benefits, including exemption from visa fees for those applying to Poland. Furthermore, after holding the Pole's Card for one year, applicants may undergo an expedited process for citizenship (Ministry of Foreign Affairs, Republic of Poland, 2022). This act is one of the fastest and most comprehensive methods for granting Polish citizenship, connected to Poland's history in the latter half of the 20th century. This process is open to individuals who identify with Poland or have Polish descent, and all decisions are made at the discretion of the authorities, subject to the fulfilment of basic requirements. Many residents or stateless individuals from former Soviet Union countries are of Polish descent, but may be unaware of the law and eligibility to initiate this process.

6.3. Comparative analysis

This comparative analysis examines the distinct approaches of Spain and Poland to naturalisation, highlighting how their legal frameworks, historical contexts, and societal priorities influence citizenship acquisition for third-country nationals. Spain's naturalisation framework, due to the colonial past, cultural proximity, shared language, and economic opportunities, prioritises citizens of Ibero-American countries. The framework governing access to Spanish citizenship includes organic and ordinary laws,

royal decrees, and legal codes, which establish the “rules of the game”. A key requirement for integration into Spanish society is demonstrating proficiency in the Spanish language. For non-Spanish speakers, the minimum required level is A2. Applicants must also possess knowledge of Spain’s cultural, political, and social landscape verified by Conocimientos Constitucionales y socio culturales de España CCSE exam. Spain offers an expedited naturalisation process for Ibero-American nationals, which is related to Spain’s colonial past.

In Poland, the dominant groups of people who undergo the naturalisation process are culturally linked to Poland. The Pole’s Card serves as one of the expedited pathways to Polish citizenship. This Act on Repatriation specifically facilitates the repatriation and naturalisation of individuals of Polish descent, including those from former Soviet countries who were stateless or deported. After holding the Pole's Card for one year, applicants may be eligible for an expedited citizenship process. Unlike Spain, Poland operates under a framework of statutory Acts (*ustawy*) as primary legislation, which comprehensively outline the rules and basic requirements for acquiring Polish citizenship. Similar to Spain, Poland requires applicants to pass a language proficiency exam for permanent residence, which is a prerequisite for naturalisation. Given these requirements, it is unsurprising that the majority of naturalised immigrants in Poland originate from neighbouring countries with linguistic and cultural ties, as well as geopolitical proximity. Poland also offers the possibility of citizenship acquisition through a presidential decree, which is at the sole discretion of the President and has been awarded based on various ties to Poland, such as for athletes or scientists, reflecting “national interest”.

Key Similarities and Differences

Both Spain and Poland adhere to the principle of *ius sanguinis*, which grants citizenship based on parental nationality to preserve cultural and family heritage. Additionally, both countries offer expedited pathways for specific groups, tied to their unique national priorities and historical contexts. The naturalisation timelines in both countries range from one to ten years, depending on the chosen pathway and fulfilment of legal residency requirements. Both require a period of legal residency (typically starting with a national D visa) and impose civic requirements, such as a police clearance, proof of sufficient financial means, and health insurance. A major difference lies in the language proficiency requirements. In Spain, the required level is A2, with Ibero-American nationals often exempt from the language exam. In Poland, a stricter B1 level is generally required for permanent residency, a prerequisite for naturalisation. This disparity influences the nationalities that successfully acquire citizenship in each country, with Poland's stricter requirements acting as a significant barrier for non-Slavic speakers. While both countries have transitioned from emigration to immigration. Spain's naturalisation process is characterised by more convenient legal pathways and generally easier procedures, leading to higher naturalisation rates and a more diverse range of applicants. Conversely, Poland’s rates are much lower, influenced by more complex laws and the rigorous B1-level language requirements, which may contribute to a more homogeneous applicant pool, predominantly from

neighbouring regions. This can lead to immigrants being confined to cycles of temporary residence renewals, despite long-term stays. A notable legal complexity in Spain concerns Moroccan nationals acquiring Spanish citizenship. While Spanish law generally requires renunciation of previous citizenship (with an exception for Ibero-American nationals), Moroccan law does not permit its citizens to renounce their nationality, leading to de facto dual nationality for Moroccans in Spain. This highlights tensions between national sovereignty in citizenship laws and the realities of global migration. The table provided in the sources also summarises these comparisons.

Table 3. Naturalisation comparisons: Spain and Poland

Country	Law: access	Naturalisation time frame	Level of acquisitions (2023)	Top previous nationalities	Language requirements	Primary legal acts
Poland	Ius Sanguinis	Path to citizenship: between 1-10 years Presidential nomination (Unknown) The Pole's Card: 1 year Marriage with a Polish citizen: 3 years Permanent residence holders: 3 years	2.87% of the total EU countries' naturalisation during 2023(1) Lowest rate 1.73% in 2021 Highest rate 5.19% in 2014	Top three: Ukraine, Belarus, Russia	B1-State Commission for the Certification of Proficiency in Polish as a Foreign Language Institution in charge: Aaństwowa Komisja Poświadczani a Znajomości Języka Polskiego jako Obcego(2)	Citizenship Act 2024(3) Repatriation Act 2022 Foreigners Act 2024
Spain	Ius Sanguinis	Sephardi Jew descendant (Unknown)	5.25% of the total EU countries' naturalisation	Top three: Morocco Venezuela Colombia	CCSE (Conocimiento de las Bases Constitucionales)	The Civil Code

		Marriage to a Spanish citizen (1 year)	process during 2023	Least: Bolivia	les y Sociocultural es de España)	Organic law 4/2000
		Legal residency for Ibero-American citizens (2 years)	Lowest rate 2.51% in 2017(1)	Peru	A2-DELE diploma oficial de español como lengua extranjera (2)	Decree 14/1958
		Acquisition of citizenship varies between 1 and 10 years.	Highest rate 7.42% in 2014	Argentina	Institution in charge: Instituto Cervantes	Decree 1155/2024 Royal decree 1004/2015

Source: Own elaboration

6. Conclusions

This comparative analysis comprehensively examines citizenship acquisition pathways in Spain and Poland, illuminating how distinct national histories, legal frameworks, and socio-economic factors profoundly influence naturalization rates and accessibility for third-country nationals. Moving beyond refugee-centric studies, this research addresses a significant gap in existing academic literature by providing a detailed, multidisciplinary understanding of these dynamics. A key finding is that access to citizenship is inherently relative, contingent upon each nation's unique immigration and legal frameworks.

Spain consistently demonstrates significantly higher citizenship acquisitions 240,208 (cases) compared to Poland with 11,785 (cases) in 2023. Spain's share among EU countries for naturalization in 2023 was 22.9%, while Poland's was 2.7%. This disparity is primarily attributed to Spain's more accessible legal pathways, simplified procedural requirements, and relatively lower language proficiency demands. Spain requires an A2 level of Spanish language proficiency for naturalization, with nationals from Ibero-American countries often exempted from this examination due to strong historical and linguistic ties. This framework, rooted in Spain's historical connections, represents a strategic political choice to integrate specific diasporic communities linked to its colonial past.

In contrast, Poland's considerably lower naturalization rates stem from more stringent requirements and a less developed migration and integration policy framework. Poland typically requires a B1 level of Polish language proficiency for permanent residency, which is a prerequisite for naturalization, posing

a significant barrier, particularly for non-Slavic speakers. This rigorous linguistic threshold, coupled with Poland's historical shifts in statehood and its relatively recent immigration history since its 2004 EU accession, often confines immigrants to cycles of temporary residence renewals, even despite long-term stays or stable employment. This contributes to a more homogeneous applicant pool, predominantly from neighboring regions with shared linguistic and cultural ties, such as Ukrainians, Belarusians, and Russians.

Despite these differences, both Spain and Poland share fundamental principles and pathways for citizenship acquisition; Both countries adhere to the principle of *ius sanguinis*, granting citizenship based on parental nationality, a mechanism crucial for preserving cultural and family heritage. In Spain, this principle is influenced by Germanic legal traditions, while in Poland, it is deeply tied to genealogy and cultural traditions, including the concept of the “intelligentsia member” as an ideal citizen.

The process in both nations typically commences with obtaining a national D visa for initial legal entry and stay, followed by an application for a temporary residence permit. The total naturalization timeline can range from one to ten years, depending on the specific pathway and fulfillment of legal residency requirements. Common civic requirements include police clearance certificates, a valid residence permit, demonstrated proficiency in the respective national language (A2 for Spanish, B1 for Polish), stable and sufficient financial means, valid health insurance, and proof of accommodation.

Both countries also offer expedited pathways that reflect their distinct national priorities and historical contexts:

Spain: Expedited naturalization is available after just two years of continuous legal residence for nationals from Ibero-American countries, Andorra, the Philippines, Equatorial Guinea, or individuals of Sephardic origin. This period can be further reduced to one year for applicants married to a Spanish citizen or meeting other family-related criteria. This framework is rooted in Spain's historical ties and a strategic political choice to integrate specific diasporic communities.

Poland: An accelerated pathway exists through the Pole’s Card (Karta Polaka), regulated by the Repatriation Act. This allows individuals of Polish descent to apply for citizenship, with the process potentially completed in as little as one year after holding the card. Poland also offers citizenship acquisition via presidential decree, a discretionary executive order by the President based on national interest, often awarded to athletes or scientists.

A significant legal paradox arises in Spain concerning Moroccan nationals acquiring Spanish citizenship. While Spanish law generally requires the renunciation of previous citizenship—with an exception for Ibero-American nationals—Moroccan law (specifically the Moroccan Code of Nationality) does not permit its citizens to voluntarily renounce their nationality. From the perspective of the Moroccan state, its nationals remain Moroccan even if they swear an oath to another country. In

fact, Morocco does not recognize it, thousands of individuals end up with de facto dual nationality. They are recognized as Spanish citizens by Spain and as Moroccan citizens by Morocco, creating a legal grey area regarding their status and rights. Actually, Moroccans represent the largest group of third-country nationals obtaining Spanish citizenship. In 2023 alone, 54,027 Moroccan nationals acquired Spanish citizenship, more than any other nationality. This discrepancy highlights the tension between national sovereignty (the right of each country to define its citizens) and the practical realities of global migration.

Finally, while both Spain and Poland have transitioned from emigration to immigration countries, their distinct approaches to integration and language proficiency profoundly shape the accessibility and outcomes of citizenship acquisition for immigrants. Spain's more streamlined process, influenced by its historical connections and lower language barriers, facilitates higher and more diverse naturalization, whereas Poland's stricter linguistic requirements and evolving policy framework contribute to lower rates and a more concentrated demographic of new citizens. Future research should delve deeper into the long-term societal impacts of these distinct naturalization patterns, the overall effectiveness of integration policies in both countries, and the everyday manifestations of legal paradoxes like the Moroccan case in Spain to provide further valuable insights into the complex dynamics of modern citizenship.

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