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10

EMIGRANTS' CITIZENSHIP IN CHINA

Jiaqi M. Liu

Scholars have closely examined how China's citizenship regime, namely, the household registration (*hukou*) system, manages domestic population movements by tying citizens' legal status and socioeconomic rights to the specific locality where they are registered (Chan 2019; Cheng and Selden 1994; Solinger 1999). In fact, the *hukou* system constitutes a comprehensive state mechanism of social control (Chan and Zhang 1999) and its impacts travel far beyond China's national territory. However, compared to the well-established body of literature on the domestic effects of *hukou*, how China's citizenship regime regulates emigrants abroad remains largely unexplored (Ho 2011).

In this chapter, building on my study of the deprivation and restoration of emigrants' *hukou* (Liu 2021), I throw into sharp relief the external dimension of *hukou* control through a genealogical investigation of China's citizenship policies towards emigrants abroad over the past seven decades. I argue that the otherwise domestically oriented *hukou* regime also governs emigrant citizenship by first revoking emigrants' citizenship and then imposing selective conditions on the restoration of citizenship upon their return. This instrumental approach towards China's own nationals bears a striking resemblance to international immigration regimes (Vortherms 2015).

According to China's citizenship laws, which will be discussed in detail below, emigrants who retain their Chinese nationality but establish residency abroad are stripped of their Chinese *hukou*, thus facing considerable obstacles in civic life in China. Most critically, they are ineligible to obtain Chinese resident identity cards (*jumin shenfenzheng*), the only acceptable legal document to obtain drivers' licenses, open bank accounts, register for mobile phone numbers, and apply for tertiary education in China. Article 14 of the 2012 Exit and Entry Administrative Law provides that emigrants can use their Chinese passports for identification purposes within China. Yet, even the Overseas Chinese Affairs Office (OCAO), which is the paramount state institution in orchestrating China's diaspora affairs, admitted that this stipulation had not been fully enforced and migrants without resident IDs were considerably underprivileged in China (OCAO 2019). Moreover, emigrants without *hukou* are excluded from the majority of localized citizenship rights, including healthcare, public education, and pensions.

These conditions create the scenario in which *hukou*-less emigrants yearn for restoring their Chinese citizenship should they seek to return and resettle in China. However, the restoration of emigrants' *hukou* is by no means automatic. Instead, it is predicated upon screening and approval from the state. By imposing selective documentary and livelihood requirements on

many *hukou*-less emigrants, China transforms the *hukou* system into an immigration regime to select and monitor potential citizens.

This powerful combination of deprivation and restoration processes leads to the dynamic unmaking and remaking of Chinese emigrants' floating citizenship. Hence, theoretically, citizenship is anything but a substantial, enduring politico-demographic fact. It is, in essence, a revocable, precarious political accomplishment. Following Brubaker (1996) and Kim (2016), I caution against perceiving citizenship as a given, static status, or "citizen-ness", that is inherent, unchanged in a state's nationals. Instead, I dive deep into the dynamism of "citizen-ization". Rather than a unidirectional, irreversible entitlement, citizenship is shaped by the state through a constellation of legal codification and bureaucratic practices.

Indeed, the deprivation of emigrant citizenship is not a unique practice in China alone. Throughout the world, emigrants generally lose residential citizenship when giving up their residence, while retaining nationality (Bauböck 1994). Consequently, they also lose local voting rights, taxation duties, and all benefits that depend on residence. Dual residency, in the sense of simultaneously enjoying all citizenship rights linked to bi-local residence, is rare and applies mostly to temporary absentees only (Bauböck 2009). Nonetheless, China's citizenship restoration procedures do seem exceptional, largely due to the country's strong regulation over internal migration and relatedly emigrants' return migration. In this chapter, I establish a conceptual bridge between Chinese and Western citizenship regimes by discussing the broader transformation of citizenship, especially the rise of denationalization, in an attempt to stimulate more dialogue across national cases.

The unmaking and remaking of emigrant citizenship

Citizenship regimes play a crucial role in demarcating mutually exclusive membership boundaries between nation states. The origin of citizenship rules, however, well predates that of nation states. Western scholars often point to Ancient Greek city-states as the birthplace of modern citizenship (Pocock 1995). Likewise, citizenship deprivation, or denationalization, also has a long-established history that dates back to Ancient Athens, where citizens could practice ostracism by electing to expel individuals deemed as posing a threat to democracy (Lenard 2018). Here, I define citizenship deprivation as the involuntary loss of national citizenship as a result of either a decision by public authorities (withdrawal of citizenship) or an automatic loss by operation of the law (lapse of citizenship) (Birnie and Bauböck 2020). Similarly, banishment or exile were widely practiced to expel unwanted persons from the membership community by sending them to far-flung places (Gibney 2017). For instance, criminals in the British Empire were frequently exiled to Australia, their Russian counterparts to Siberia, and Chinese criminals to Manchuria or modern-day Xinjiang. These various pre-modern forms of citizenship deprivation all served to reinforce the boundaries of belonging and distinguish insiders from undesirable "others" who were unworthy of membership (Anderson et al. 2011).

The rise of international human rights rhetoric and conventions since World War Two gave rise to the withering away of expulsion, as it came to be associated with totalitarian regimes and undemocratic practices. Dubbed by Arendt (1973) as "the right to have rights", the fundamental value of citizenship was rediscovered from the ashes of atrocities in which Jewish victims were first exiled to concentration camps and then massacred by the Nazi regime (Gibney 2020). More importantly, the post-World War Two international human rights regime also shaped the contemporary citizenship deprivation rules concerning *emigrants* (Lepoutre 2020). First, both article 13(2) of the 1948 Universal Declaration of Human Rights and article 12(2) of the 1966

International Covenant on Civil and Political Rights recognize the right to exit, namely, the right to leave one's country. The freedom of emigration has been naturalized as a fundamental form of democratic practice, or "vote with feet" (Dowty 1989). Second, reducing statelessness was recognized as an essential goal in the postwar world order in which the reach of national sovereignty is mutually exclusive and little, if any, membership ambiguity is allowed (Honohan 2020). These conditions put a check on the state power of depriving emigrants of their citizenship for long-term residence abroad.

The past two decades have witnessed, however, the revival of citizenship deprivation as a means to curb global terrorism. Since the 9/11 attack, Western liberal democracies, especially Britain, increasingly strip terrorist suspects of their nationality and expel them to countries of second nationality (Joppke 2016). These illiberal practices stimulate heated ethical and legal debates regarding the legitimacy of citizenship revocation based on national security concerns (Birnie and Bauböck 2020; Fargues and Winter 2019). A welcoming development notwithstanding, this rekindling of scholarly interests has largely lost sight of other forms of citizenship deprivation, especially denationalization caused by emigration and long-term foreign residence (Lepoutre 2020). What is also missing in extant literature is the restoration of citizenship for emigrants who were previously denationalized. In this chapter, I juxtapose the procedures of citizenship deprivation and restoration in a single analytical framework to lay bare the dynamic citizenship regime that governs the membership of emigrants. These malleable processes enable the state to redefine the belonging of absent and returned members and reinforce their territorial sovereignty through the control over residential rights.

According to Lenard (2018), citizenship encompasses three rights – the right to vote, the right to hold a passport, and residential security. Among them, residential security stands at the top of the pyramid and should be understood as the linchpin of the right of citizenship. As I will show below, the deprivation and restoration policies towards emigrant citizenship are indeed centered upon the state regulation of emigrants' residential right in China. These rules reshape state–citizen relations by transforming emigrants' security of residence in their country of nationality (Lavi 2010: 409). In this chapter, I highlight the central role of the changing state conceptualization of "foreign residency" or "settlement abroad" in determining emigrants' citizenship in their homeland. Of paramount significance in this emigrant citizenship regime is China's *hukou* system, which disfavors population movements, both domestic and transborder, as well as seeks to anchor Chinese citizens in a specific locality.

The external control of *hukou*

While *hukou* has evolved into an overarching tool of social control and classification over the past seven decades, its original and primary function has been the management of population movements (Cheng and Selden 1994; Solinger 1999). Nevertheless, existing *hukou* studies focus on the impacts of *hukou* on internal migration within China, while falling short of examining its far-reaching regulatory effects upon emigrants abroad. In this chapter, I draw scholarly attention to the equally powerful, yet oft-neglected, external dimension of *hukou* control. I argue that China's emigrant citizenship regime is more than a necessary extension of the *hukou* system into the emigrant population. Rather, it has generated a dynamic institutional trajectory of its own through decades of legal codification and decentralized improvisation. While Chan and Zhang (1999) analogize the *hukou* system to an "internal passport system", I go one step further to lay bare its functioning as a quasi-immigration regime that de-links absent migrants in the deprivation procedures and selects favorable citizens in the restoration procedures.

It is worth noting that the external control of *hukou* only applies to Chinese nationals. As China does not recognize dual nationality, those who naturalize abroad automatically lose their Chinese nationality and original *hukou*. Chinese diaspora laws clearly distinguish between *huaqiao*, i.e., emigrants who retain Chinese nationality, and *huaren*, i.e., migrants who have obtained foreign nationality or people of Chinese descent (Liu 2020). In order to enter and live in China, the latter group has to apply for Chinese visas, while the former can re-enter freely in most circumstances.

Nonetheless, overseas Chinese who hold Chinese passports cannot resettle in China after establishing foreign residency and losing their local *hukou*. A key requirement in the restoration of *hukou* is the withdrawal of foreign residency. All returnee applicants have to sign a document declaring their voluntary revocation of residential rights abroad. The resultant sole Chinese residency constitutes a major precondition for re-establishing Chinese *hukou*. In this sense, China forbids not only dual nationality but also dual residency.

This examination of emigrant citizenship in a state where dual nationality is not allowed addresses the overconcentration of extant literature in countries that permit dual or multiple nationalities. Admittedly, dual nationality enjoys an increasing popularity in most parts of the world, as it was recognized by over 75% of all countries by 2018 (Vink et al. 2019). The global diffusion of dual nationality also makes possible the wider adoption of denationalization rules, which I have discussed above. With dual nationalities, people who are denationalized in one country would not become stateless, thus helping that country fulfill its responsibility under international statelessness conventions (Lepoutre 2020).

However, it is the states where dual nationality is not permitted that are capable of exerting full control over mono-nationals as the sole sovereign state of nationality. State power reaches the apogee when governing with full potency the membership of mono-nationals who have no alternative political communities to claim protection. This study illustrates these points through a genealogical analysis of China's citizenship deprivation and restoration policies over the past seven decades.

Citizenship deprivation

The citizenship deprivation policy stemmed from the 1958 Household Registration Regulation, the very regulation that created the *hukou* system. Its article 10 provides that citizens who move out of the jurisdiction where their *hukou* is registered have to register their out-migration and withdraw their original *hukou*. This stipulation, however, targeted domestic migrants within China, instead of transborder migrants, given the fact that emigration abroad was considered as a betrayal of the socialist regime and therefore seldom took place in the Maoist era (Xiang 2003). It was not until the onset of the economic reform era in the early 1980s that emigration control was greatly liberalized. Then the question of whether this stipulation also applies to transborder migrants ensued.

The 1986 Administrative Law on the Exit and Entry of Citizens (hereafter 1986 Exit and Entry Law) provided the answer. It was the first national law that offered institutional scaffolds for Chinese citizens' freedom of emigration, while hinting at their limited right of return. Its article 10 obliged Chinese nationals abroad to “*apply for return*” (emphasis added), implying that return was conditioned upon permission from the state. This requirement was further spelled out in the 1986 administrative rule on the implementation of the 1986 Exit and Entry Law. Its article 7 provided that Chinese nationals who have “settled down abroad” (*dingju*) have to withdraw their local *hukou* and that migrants who plan to return to China have to first apply for their return and then restore their *hukou* in the home locality.

Nonetheless, official definitions of “settle down abroad” have oscillated in a variegated array of legal documents published as early as 1957. That year, a legal document used the term “sojourn” (*qiaojū*) in determining whether emigration was established (Overseas Chinese Affairs Commission 1957). The concept of “sojourn”, however, was cloaked in ideological and geopolitical considerations of the nascent communist regime, as the criteria for “sojourn” were closely associated with the political backgrounds of emigrants. Since the 1980s, economic pragmatism began to occupy the central place of the membership politics in reformist China. As a consequence, the overall tendency has been to adopt increasingly specific and narrower definitions for “settle down abroad”.

In 1984, an amendment to the 1957 document clearly defined “settle down abroad” as “having obtained the right of residency, or having resided and earned a living abroad”, rendering all emigrants susceptible to citizenship deprivation, regardless of how long they had resided abroad or what their legal statuses were (OCAO 1984). In 2005, a legal explanation narrowed the definition of “settle down abroad” to “having obtained a long-term or permanent residency permit”, thus exempting those holding short-term residency permits from citizenship revocation (OCAO 2005). In 2009, this definition was further narrowed, adding the additional requirement of actual residence abroad for over 18 months in two consecutive years (OCAO 2009). Hence, emigrants who hold residency permits abroad but do not actually reside abroad can still avoid losing *hukou*. Notwithstanding the continuous narrowing of citizenship deprivation definitions over time, the bulk of emigrants are still subject to this policy as long as they reside abroad for a prolonged period.

It remains equivocal, however, to what extent citizenship deprivation policies are actually enforced on the ground. The 1986 Exit and Entry Law was abolished by the 2012 Exit-Entry Administration Law, which is the current primary migration statute in China. The 2012 new law does not explicitly require citizenship deprivation after emigrants establish foreign residency and its more specific administrative implementation rules had not been issued as of November 2020. But it can be implied that citizenship deprivation is still mandatory. According to a legal explanation, provisions in the 1986 administrative rule remain valid, as long as they do not contradict with the 2012 Exit-Entry Administration Law (Ministry of Public Security 2017). Given that the 2012 law contains a similar provision (article 13) akin to article 10 of the 1986 Law, it can be assumed that citizenship deprivation remains binding under the new law.

Nevertheless, the *hukou* system is highly decentralized (Wu 2013) and the implementation of *hukou* revocation may vary in different localities. Local governments exert a varying degree of autonomy in designing local rules and implementing national policies based on local conditions. As I demonstrated in the case of Wuse County (Liu 2021), some localities with sizable emigrant communities may have suspended the practice of citizenship revocations in order to facilitate emigration and return migration, running counter to the national policy. More comparative studies of local improvisation of *hukou* deprivation may shed new light on the differentiated citizenship across China.

However, in the 2020 national census, which takes place every ten years, national and local governments required Chinese citizens who have resided abroad to deregister their *hukou* (Xinhua 2020). While local implementation rules still differed significantly as to what constituted “settlement abroad”, this latest development once again reminded Chinese emigrants of their precarious citizenship status in their home country. Furthermore, citizenship deprivation also serves as the prerequisite for its restoration and paves the way for even more rigorous control over emigrant citizenship. It is the antecedent practice of citizenship deprivation that necessitates *hukou* restoration, to which the following section will turn.

Citizenship restoration

In the Maoist era, emigration abroad was nearly impossible, making the return of Chinese nationals even less likely. The sporadic return migration that did occur, especially the “refugee return” of ethnic Chinese minorities from Southeast Asia (*guinanqiao*), was dealt with in an ad hoc manner for specific geopolitical or ideological purposes (Peterson 2013). After the 1955 Bandung conference in Indonesia, China established the official stance of disfavoring overseas Chinese return migration while encouraging their naturalization and integration in host countries (Zhou 2019). In comparison, in the postsocialist era, return migration emerged not only as a favorable policy promoted by the state, aimed at attracting foreign investment for economic development, but also a new problematic to be solved, so that citizen-less emigrants can return and resettle.

The citizenship restoration policy first appeared in a 1985 legal notice that exempted Chinese nationals who would temporarily return to China from the requirement of applying for entry visas, yet obliging those who sought to permanently resettle in China to *apply for* their resettlement (Ministry of Public Security, Ministry of Foreign Affairs and State Council 1985). Article 3 of this notice also demanded “rigorous control” (*congyan guanli*) over the approval of resettlements of Chinese emigrants from North Korea, Mongolia, and the Soviet Union, because the number of returnees from these countries was “too large” and the government had to “avoid the difficulties of handling their resettlement in China”. In other words, the state deliberately confined Chinese nationals’ right of resettlement to shun its responsibilities towards potential citizens.

Nevertheless, restrictions over the state’s approval applied not only for returnees from these three countries but anyone whom the state deems economically unproductive and socially burdensome. According to an internal document issued in the same year:

If a Chinese citizen who has settled abroad asks for a return to China to settle down, the examination and approval departments *must strictly control it* and do not advocate for the principle of “falling leaves return to the roots” (*luoyeguigen*). In particular, for those who do not have any expertise and those who have lost their ability to work and only seek to return for retirement purposes, [the government] should *try its best to politely reject them and avoid increasing the burden on the state*.

(Ministry of Foreign Affairs, OCAO, and Ministry of Public Security 1985, *emphases added*)

Here, the state laid bare its intention of controlling return migration in the official examination and approval procedures. Most notably, it dismissed the principle of “falling leaves return to the roots”, which was often used by local governments to woo Chinese migrants for investments and remittances in the era of economic takeoff (Pieke and Speelman 2013). It specifically singled out low-skilled, unproductive, and elder emigrants as potential burdens for the state and stressed “polite rejection” (*wanju*) as a practical method to sanitize the state’s refusal of resettling its own nationals who were deemed “burdensome”.

Two years later, the OCAO admitted that this mode of “rigorous control” was “too stringent”, “unfair and unreasonable” (*youshi qingli*), and “not conducive to unite the Overseas Chinese and their relatives” (OCAO 1987). It nonetheless held on to the principle of “rigorous control” and only added a few exceptions for widowed senior emigrants and others who could provide social welfare on their own. These instrumentalist policies fell a long way short of the hospitable official stance in publicly promulgated laws. For instance, article 5 of the 1990 Law on the Protection of the Rights and Interests of Returned Overseas Chinese and Family

Members and its 2009 amendment both guarantee the right of return for Overseas Chinese and the state's obligation of "making arrangements" (*anzhi*) accordingly.

To meet this objective of controlling return migration, the state established a two-step procedure for *hukou* restoration in chapter 3 of the implementation rule for the 1986 Exit and Entry Law and article 13 of the 2012 Exit-Entry Administration Law. The first step is to obtain a certificate of return and resettlement (*huiguodingjuzheng*) from Chinese embassies or consulates in the country where emigrants have settled down. The next step is to register *hukou* at the local Bureau of Public Security with this certificate within 30 days upon arrival in China. Hence, the process of restoring emigrants' Chinese citizenship often begins in foreign countries even before the physical return migration takes place. Despite a domestic status and entitlement, emigrant citizenship's bureaucratic tentacle reaches far out into the transborder population in host societies.

There are also a series of preconditions for citizenship restoration, the primary one being the revocation of permanent residency abroad. Returnees have to sign a statement for voluntary withdrawal of foreign residency. By forcing them to renounce foreign residency before re-establishing *hukou*, the citizenship restoration policy again bars Chinese nationals from possessing dual residency.

Returnees also need to fulfill two specific residence and livelihood requirements provided in a 2013 regulation: first, continuous residence in China for a certain period of time; second, stable livelihood guarantees and legal fixed residence in China (OCAO, Ministry of Public Security and Ministry of Foreign Affairs 2013). These requirements select only economically well-off emigrants to resettle in China and hinder returnees from adding extra burden to the Chinese public welfare system. This selective restoration of citizenship has the earmarks of an international immigration regime driven by a contractual logic of granting citizenship only to socioeconomically favorable migrants (Somers 2008). Hence, the Chinese citizenship no longer constitutes innate rights enjoyed by equal members, but is turned into an earned privilege bestowed by the state (Zhang 2018).

Overall, this genealogical examination of *hukou* deprivation and restoration indicates that emigrant citizenship is profoundly produced by an onerous, fluctuating process of legal construction and codification. The state's painstaking efforts of codifying and institutionalizing emigrant citizenship are based on its calculations of who should be excluded and who should be embraced (Torpey 2000). Instead of an inherent, natural characteristic, emigrant citizenship is, in essence, a politico-legal construct by the home state to re-establish control over absent or returned members.

This politico-legal construct, however, is far from uniform across China. According to Zhou's (2016) estimate, as of 30 December 2015, 29 out of 34 provincial-level governments had issued local rules on *hukou* restoration for emigrants. These rules differ significantly in substantive and procedural requirements for citizenship restoration. Given the decentralized, or, more precisely, fractured nature of China's citizenship regime (Wu 2013), we need a more nuanced understanding of emigrant citizenship policies in their on-the-ground operation (Liu 2021).

Conclusion

This chapter presents one of the first attempts at examining the external dimension of the *hukou* control over international migration. A genealogical examination of China's citizenship deprivation and restoration policies over the past seven decades uncovers the historically contingent transformations of emigrant citizenship and helps us better understand the shifting boundary between "desirable" vs. "undesirable" citizens (Fargues and Winter 2019).

The Chinese state first revokes emigrants' citizenship and then imposes selective conditions on the restoration of citizenship upon their return. Rather than simply a measure of giving up control, citizenship deprivation is a strategic response to delink emigrants from their country of nationality. The construction of citizen-less nationals lays the groundwork for the state's reinsertion of emigrants into the matrices of sovereign power. The state sets in motion a string of bureaucratic processes to restart extracting from these long-absent members the necessary resources to reproduce the state itself, such as verified knowledge about the population, foreign direct investments, and high human capital yields from the returnees' brain gain. The state reactivates its capacity of keeping track of the populations' identity and movements, rendering them legible again and readily available for state control. Despite a domestic administrative procedure, the citizenship restoration policy adopts the model of international immigration regimes to select and document favorable citizens who are conditionally approved to resettle in China, their country of nationality.

The ongoing reform and gradual dismantling of *hukou* as a system of differentiated local citizenship, however, may reshape the citizenship rights of returning nationals. Over the past four decades since the Reform and Opening Up, China has gradually loosened its *hukou* control by allowing more rural migrants to work and live in cities, liberalizing *hukou* conversions from rural to urban statuses, and granting more welfare benefits to *hukou*-less residents. The 2014 national urbanization plan, in particular, moved a giant step forward by eliminating *hukou* restrictions in small- and medium-size cities, while only retaining *hukou* quotas for top-tier metropolises, including, most notably, Beijing and Shanghai (Chan 2019). These transformations in China's internal migration control may bear critical implications for its external control, which builds on and also goes beyond the domestic dimension of the *hukou* system.

Moreover, China has adopted a more friendly stance towards overseas Chinese by creating a permanent residence system in 2004 and granting emigrants who have naturalized abroad the right to abode in China (Liu 2010). In 2020, when the Chinese government considered lowering the threshold for permanent residents, this alleged preferential treatment for foreigners drew widespread online criticism and pushed state-diaspora relations into national spotlight (Wong and Fu 2020). Despite these obstacles, China has shown renewed interest in broadening naturalized emigrants' Chinese citizenship. It remains to be seen whether emigrants who are still Chinese nationals can also benefit from these recent reforms.

The increasing human and economic capital of new emigrants (*xin yimin*), coupled with the rise of return migration (Xiang 2016), may also lead the Chinese government to rethink its affinity with diasporas as well as the detrimental effects of *hukou* deregistration in alienating emigrants. As the incumbent Xi Jinping leadership has adopted a more assertive geopolitical strategy to claim China's global power, diasporas play more important roles in the state's soft power grand plans and, therefore, they gain more bargaining power in their negotiation of belonging and membership with the homeland government (Thunø 2017). Future research may look into how these newly emerging trends can soften China's control over emigrant citizenship through *hukou* deprivation and restoration.

Furthermore, I have mainly focused on a genealogical study of state policies in order to bring to light and into question the underexamined external dimension of *hukou* control. What is missing in this state-centered account, however, is an investigation of the agency and coping strategies of emigrants who are affected by these policies. What are the experiences, emotions, and counterstrategies of emigrants who have lost *hukou*? How do returnees navigate through complicated citizenship restoration procedures? Have they acquiesced in or resisted the difficult requirements to restore their citizenship? More interviews and ethnographic studies from the perspective of emigrants as active agents should be conducted to depict a more complete

picture of the interaction between the state and emigrants in the transformation of emigrant citizenship.

Finally, China's emigrant citizenship policies are indeed not *sui generis*. Similar household registration systems exist or used to exist in countries or regions influenced by Chinese imperial Confucianism, including Japan, North Korea, South Korea, Vietnam, and Taiwan (Wang 2005:154–157). The regime in Taiwan, in particular, maintains a similar legal category of citizen-less nationals, or, in the official lexicon, “nationals without household registration”. People who fall under this category are nationals but subject to immigration controls and have no residential or political rights in Taiwan. Many holders of this status, whose total number is currently standing at roughly 60,000, are overseas descendants of Taiwan citizens. Most importantly, the dividing line here is also the household registration (or *hujū*, in the Taiwan context) status, and there is a comparable set of rules governing the acquisition and loss of this citizenship status (Chung et al. 2020), thus bearing some resemblance to emigrant citizenship policies across the Taiwan Strait. A comparative study of how the household registration system in other East Asian countries may transform emigrant citizenship can greatly enrich our collective understanding. Moving beyond the Asian context, in the case of US citizens abroad, taxation of global income independently of residence is a similar instrument for state control over emigrants (Kirsch 2007). Our research on emigrant citizenship may greatly benefit from a more systematic comparison across state boundaries.

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