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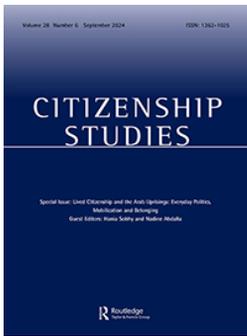
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The problem with the Comoros solution: affect, citizenship, statelessness and the Kuwaiti Bidoon

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ABSTRACT

The Kuwaiti bidoon are a subset of the nomadic population of Kuwait who have been made stateless, classified as illegal residents and increasingly deprived of social rights through changing classifications by the Kuwaiti government. In 2014, the Kuwaiti government attempted to obtain citizenship in the African island nation of the Comoros for the bidoon, which would have provided them with a route to legal residency. But would this have provided a just resolution to the bidoon's situation? We argue that justice for the bidoon must not simply serve to resolve their de jure statelessness; it must, instead, attend to the injuries produced by this status, most importantly the harm caused by continuous rejection of their affective attachment to Kuwait. In dialogue with theories of access to citizenship and political identification with a state, we argue that under certain circumstances, providing citizenship can increase the harm experienced by stateless people, and that only providing recognition of their affective tie to a political community can resolve it.

In November 2014, the Kuwaiti government agreed with the government of the Comoros to provide the bidoon, a group of stateless people who have resided in Kuwait for decades but are considered illegal residents by the Kuwaiti state, Comorian citizenship in exchange for direct Kuwaiti investment in the Comoros. Given that the bidoon have been stateless since the 1950s and suffer significant restrictions because of their lack of access to citizenship, this might be seen as a major improvement in their status, giving them access to all the rights that come with citizenship. And yet, activists for bidoon rights were not overjoyed with the decision, and individual bidoon did not rush to acquire Comorian citizenship.

In this paper, we argue that a solution to the statelessness of the bidoon must not simply serve to grant them citizenship; it must, instead, attend to the injuries of their statelessness, most notably the injury they suffer because their affective attachment to Kuwait is denied through the state's rejection of their claim to membership. While statelessness is legally defined as not being recognized as a national by any country, we claim that those who are stateless experience a kind of harm that this legal definition does not capture: the lack of full membership in a state as well as the lack of membership in the specific political community they are most affectively attached to. Full membership

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somewhere other than Kuwait will not only fail to solve the injustice the bidoon experience – it will in fact consolidate it.

This paper draws from, and is in dialogue with, the published literature on the bidoon, both academic and policy-oriented, as well as English-language reporting on Kuwait in Kuwaiti and other publications. We have not been able to collect new data on the experience of the bidoon during the period where Comorian citizenship was being promoted (apart from some casual conversations with other researchers with first-hand knowledge), and the information that is available on the Comoros deal, as well as all reporting on the bidoon, is inconsistent and limited. Despite the limits of this data, we aim to provide the clearest narrative we can of the Comoros proposal and its conse-quences, but our focus is on what this set of policy decisions helps us understand about the nature of statelessness, and, therefore, the nature of citizenship. Our argument contributes to theorizing on the nature and just distribution of citizenship and is fundamentally normative: we believe that a just solution to the injustices suffered by stateless people requires more than simply the acquisition of citizenship, and an explora-tion of the empirics of this case helps us develop that argument.

We begin this paper with a historical account of the bidoon in Kuwait, exploring how their statelessness was produced by the state-building and state-consolidating processes within Kuwaiti society, and then describe how the 'Comoros solution' was developed and presented, only to fail over time. Next, we explore the meanings of citizenship in Kuwait, including discussing its transactional nature, and explore why the Kuwaiti state might have thought the 'Comoros solution' worthwhile. Following that, we address why the Comoros solution fails for the bidoon themselves, with a particular focus on its role in denying their ongoing affective attachment to Kuwait. Finally, we explore other cases where a lack of affirmation of affective attachment, and not only a lack of citizenship, is central to ongoing exclusions and creates injustices, where recognition of affective attachment is central to the provision of justice.

The situation of the Kuwaiti bidoon

Citizenship, as a status, is distributed by sovereign states according to processes over which they have an exclusive right. Most countries use jus soli (citizenship for those born within the country) and/or jus sanguinis (passed from parent to child) principles in order to distribute citizenship, along with different forms of naturalization. By contrast, a stateless person is defined in the 1954 Convention on the Status of Stateless Persons as 'a person who is not considered as a national by any State under the operation of its law' (art. 1).[1] The category 'stateless' technically applies only to those who lack nationality (a term which is used synonymously with citizenship). However, in addition to these 'de jure' stateless people, scholars have developed the concept of 'de facto' statelessness, which is not defined in any international treaty, to refer to people who have a nationality but lack the protection of the state whose nationality they hold, that is, those who lack an *effective* nationality (Batchelor 1995, 1998; Massey 2010).

The people called 'bidoon' (literally 'without', from 'bidoon jinsiya', 'without nation-ality') have been in the area that includes modern Kuwait prior to the creation of modern states (Benswait 2021). Kuwaiti society is divided into *hadhar* (settled) and *bedu* (Bedouin, tribal, or nomadic) components, distinguishing between those that were

settled in cities before the mid-1950s, and those that continued to practice nomadism, either until later in the 20th century or until today. The royal family and other elite merchants who make up the core political basis of the state were and continue to be *hadhar*, with the state itself emerging out of the consolidation of the rule of the city of Kuwait. The bidoon are a subset of the *bedu* population who were never given Kuwait citizenship.[2]

Nationality in Kuwait is governed by the 1959 Nationality Law, which grants citizenship to 'those persons who were settled in Kuwait prior to 1920' (Article 1) and to 'any person born in, or outside, Kuwait whose father is a Kuwaiti national' (Article 2) using a common Middle Eastern variant of jus sanguinis where fathers pass citizenship to children, but mothers can do so only in certain exceptional circumstances (Article 3). Despite the fact that in 1920 (and in 1959), a significant portion of Kuwait's population was made of *bedu* pastoralists, the law grounds citizenship in *hadhar*/settled status. Al-Nakib (2014) details some of the significant consequences of this: at the time of citizenship registration, only urban dwellers were able to provide proof of settlement and were designated Kuwaiti citizens *bi-l-taʾsīs* (by establishment or founding). A large number of bedu tribespeople, at the same time, were granted citizenship *bi-l-tajnīs* (by naturalization) in exchange for service in the military; these waves of naturalization continued into the 1960s and included both tribes from within Kuwait, and from over the (recent and porous) border with Saudi Arabia. At present, naturalization is theoretically permitted but has strict requirements, including that applicants are Muslim, fluent in Arabic and have lived in Kuwait for 20 years (Nationality Law, 1959, Article 4), and few potential applicants are naturalized. In this process of citizenship distribution, the bidoon were made stateless without ever having been included in a state to begin with.[3] Critical and activist scholars argue that their continuous and systematic exclusion from citizenship is based on a desire to maintain *hadhar* supremacy in Kuwaiti society (Nour Al Deen 2018).

Policy narratives about the bidoon vary, with researchers generally framing the bidoon as failing to register for citizenship in 1961 due to their illiteracy or distrust of the state (Alaradi 2008, Lynch and Barbieri, 2007, cited in Al-Nakib 2014; Tétreault 2000), or as traditionally nomadic communities who would routinely cross the borders of Kuwait from neighboring Saudi Arabia or Iraq in order to work in Kuwait, at some points with government encouragement (see Shiblak 2011, 175 for references). Both of these discourses can be used by state actors to justify and reproduce their exclusion. State discourses generally argue that the bidoon are migrants from neighboring states that desire Kuwaiti citizenship because of the material benefits it offers and are concealing their original citizenships (Alnajjar 2024; Arab Times Online 2024; Human Rights Watch 2024; US Department of State 2023); evidence that this is true is broadly lacking. Without attempting to resolve these different narratives, we take the position that, given that the bidoon's *bedu* ancestors were nomads in a region with a long history of nomadic movement, that the borders of Kuwait and its neighbors and the citizenship regimes that assigned membership in the modern states of the region are comparatively recent and highly arbitrary, and that the bidoon have unquestionably been resident within Kuwait's borders for generations, their Kuwaitiness is meaningful and substantive, regardless of the details of their legal status.

Changing discourses, changing statuses

Before 1986, the status of the bidoon in Kuwait was 'unregulated' (Beaugrand 2011, 235). In particular, the bidoon were exempted from fulfilling the requirements of the Law on the Residence of Aliens, were counted in official statistics, and 'maintained all the rights that Kuwaiti citizens had, such as housing subsidies, education, and access to health services with the exception of the political right to vote' (Alaradi 2008, 20). They were restricted from obtaining regular passports, but they were eligible to carry an 'Article 17 passport', a temporary laissez-passer document named for the relevant clause in the 1962 Passport Law (Canada, Immigration and Refugee Board: 2001). The Article 17 passport made it possible for some bidoon to travel outside of the country, although visa access was more limited and, according to Shiblak, 'the Director of the Nationality and Travel Documents has acknowledged that in most situations acquiring a passport takes a lot of "*wasta*" [networking or connections] from someone in power' (2011, 182).

In the 1980s, the escalation in regional violence with the Iran–Iraq War, along with the economic insecurity caused by the drop in oil prices in 1984 and 1985, contributed to an increase in suspicion against all non-citizens in Kuwait, and bidoon began to be regarded not as unregistered tribesmen who might be Kuwaiti, but as nomadic migrants from neighboring states who might be disloyal to Kuwait (Abrahamian 2015). Following the 1986 attack on the Emir, in which bidoon were allegedly involved, the Kuwaiti authorities launched an anti-bidoon campaign (Shiblak 2011) and increased what Beaugrand (2011) calls 'administrative violence' against the bidoon. In December 1986, a secret ministerial decree applied Law 17/1959 to the bidoon, giving them 6 months to present to the Kuwaiti government the same documents that legal foreigners must present, and turning any bidoon who could not produce these documents into illegal residents.

The 1990 Iraqi invasion of Kuwait made things even worse for the bidoon, who were accused of collaborating with the occupying power, an accusation also made against Arabs from other countries, especially Palestinians (Abrahamian 2015; Shiblak 2011). Bidoon were among those held in refugee camps near the Iraqi border and were not allowed to return to Kuwait if they had crossed the Iraqi border in fleeing fighting (Boghardt 2006). Those who remained in the country faced killings, disappearances, and threats of deportation; even after the war, bidoon accused of collaborating with the Iraqis were denied nationality through a process known as 'security blocks' (Elgayar 2020; UK Home Office 2016).

Since the 1990s, and especially after 2000, the Kuwaiti government has persistently argued that most of the bidoon are Iraqi, Saudi, Iranian, and Syrian and that they have hidden or destroyed their original identity documents in order to become Kuwaiti and benefit from the wealth and the welfare system of the oil-rich country (Longva 2006). This should be understood in the context of several convergent factors. The first is a continued narrowing of access to citizenship in general; the Nationality Law has been amended over a dozen times since its inception, always becoming more restrictive (Human Rights Watch 2011). The second is a growing moral panic linked to migration; a full 60% of the population consists of migrants, mostly from South and Southeast Asia (replacing Arab migrant workers forcibly deported or encouraged to repatriate after the 1991 Gulf War) with no access to permanent residence or eventual citizenship. The third is the strong relationship between welfare provision and citizenship. Kuwaiti citizens are

entitled to generous social welfare benefits, particularly in the spheres of education, housing, health care, and employment. These high welfare expectations are a core part of Kuwaiti citizens' relationship with the state and have historically served to generate legitimacy and support for the government (Tétreault 2001, 204) – making it, in Meijer (2019)'s framework, a passive citizenship regime distinguished by 'an exchange of political rights for economic and social rights' (615). This combines with the large number of migrants to frame citizenship as a limited benefit that should not be extended indefinitely. Finally, the increasing attention to statelessness as a problem on the global stage – including through the 2014 launch of UNHCR's #IBelong campaign to end statelessness by 2024–meant that international human rights institutions and the United Nations identified the existence of the bidoon as a problem that the Kuwaiti state should rectify.

During this period, bidoon were progressively deprived of the rights they had previously enjoyed (Beaugrand 2011), including being stripped of and denied documents such as IDs or driving licenses, which interfered with their ability to access basic services, employment, and to register births, marriages, divorces, and deaths (*Arab Times*, 6 April 2016; *Kuwait Times*, 9 August 2015; Shiblak 2011). Alaradi (2008) documents that, once bidoon were reclassified as illegal residents, they were compelled to renounce their right to return in order to be issued travel documents. In October 1993, the Central Committee to Resolve the Status of Illegal Residents was established by decree, followed by the Executive Committee for Illegal Residents' Affairs in March 1996, and by the Central Apparatus for the Remedy of the Situation of Illegal Residents in November 2010. The Central Apparatus was established as a special unit within the Ministry of Interior, meaning it has military and security staff and reports directly to the Emir of Kuwait (Nour Al Deen 2020).

With the establishment of the Central Apparatus and the reclassification of bidoon as 'illegal residents', a security clearance became mandatory for the bidoon wishing to apply for naturalization or an Article 17 passport, or to request support with school and medical fees. The Central Apparatus can issue a bidoon a renewable 'Review Card' (RC) – also officially called Reporting or Attendance Card. The Review Card makes it possible for bidoon to be documented, which gives them the right to work, to access basic public services and to hold a driver's license – although it provides access to fewer rights than the civil ID issued to Kuwaiti citizens and legal foreign residents (United Kingdom: Home Office, *Country Information and Guidance – Kuwait: Bidoons*, July 2016). The Review Card also serves primarily to monitor the bidoon and is marked by color to indicate the legal status of the holder: red for those who are deemed to have destroyed their passport or committed a crime, yellow for those subject to additional appraisal and green for those who might be eligible for citizenship (Lund-Johansen 2014; Shiblak 2011). Bidoon without Review Cards are prohibited from working in Kuwait, and those who employ them are fined – with the fines usually deducted from the bidoon's salary (Shiblak 2011).

According to the Central Apparatus, 7,000 bidoon 'adjusted' their status between 2011 and 2016 (Kuwait Times, 19 March 2016) – a small number in comparison to the at least 100,000 bidoon resident in Kuwait. The number of bidoon the state might be willing to naturalize has been continually reduced. Law 22 of 2000, for example, allowed the naturalization of 2000 people a year, under multiple conditions – among them, the

proof that they had registered in the 1965 census. By 2015, 34000 bidoon had submitted proof of their ancestors having registered in the 1965 census to the Central Apparatus, but the Apparatus only accepted 31,189 applications as legitimate, and suggested it might only give citizenship to about 3000 (*Kuwait Times*, 9 August 2015), concentrating on those with postgraduate degrees and indicating that any bidoon being naturalized 'must reveal their original documents' (*Kuwait Times*, 22 August 2015). In January 2016, the Central Apparatus stated that from the 32,678 files they studied 22,037 belonged to bidoon who did not meet the requirements for citizenship, and only nominated 745 bidoon for naturalization (*Kuwait Times*, 3 January 2016). The Assistant Undersecretary for Citizenship and Passport Affairs, Mazen al-Jarrah, was quoted in the *Kuwait Times* as refusing a parliamentary demand to naturalize 4000 bidoon a year, saying that 'Citizenship is not a means of public transportation' (*Kuwait Times*, 27 April 2016), implying that it cannot be provided to all who might want it.

The bidoon's poverty and social stigmatization has been reinforced by successive government policies, such as an exclusionary housing policy that results in spatial segregation (Al-Nakib 2014; Shiblak 2011; Minority Rights Group International 2017). Their status as 'illegal migrants' has served to justify their exclusion from welfare benefits, including free education and health care, and constructs them as a threat to national security (Beaugrand 2011; Shiblak 2011), labeling them as 'undeserving' of Kuwaiti citizenship. Not only are the bidoon often portrayed by government officials as wanting to take advantage of the benefits of Kuwaiti citizenship, they are also depicted as culturally opposed to a modern, progressive society due to their tribal origins, embodying a negative combination of nomadism and lawlessness. In the words of an officer from the Ministry of Interior, 'the *hadhr* respect the law whereas the tribes do not respect the law: they use *wasta*. This rules this country and [represents] a long-term problem' (Beaugrand 2010, 228).

The bidoon have not been passive objects of state policy. The organization Bidoon Rights and other human rights organizations have continually called for justice for the bidoon, including through street protests in defiance of legal limits on demonstrations and a forceful police response. Some activists and their family members have received 'security blocks' preventing employment and access to social services; others have left the country while remaining politically organized. In addition, numerous cases of suicide among the bidoon, including by public self-immolation, have been documented in the Kuwaiti press, adding to the perceived urgency of the issue in the public eye. [4]

The Comoros 'Solution'

In 2014, Kuwait entered into negotiations with the African island nation of the Comoros to give the bidoon Comorian citizenship. They followed the path begun by the UAE, which in 2009 began investing in the Comoros in exchange for citizenship for those it considered as stateless (Abrahamian 2015). While bidoon in Kuwait are generally all descendants of tribal communities who were frequently within the modern borders of Kuwait at the time of statehood, the category of bidoon or stateless in the UAE refers to a more diverse group of residents, including the descendants of a large population of Omani refugees from Zanzibar who arrived in the 1960s, as well as other multi-generational residents, many of whom had received

naturalization decrees and had formerly held passports from the UAE or one of its constituent Emirates (Albarazi and Kuzmova 2021). At least 10,000 bidoon residing in the UAE obtained Comorian passports, according to *Financial Times* (4 June 2012).

The Kuwaiti government announced in 2014 that the bidoon would be granted Comorian citizenship in exchange for Kuwaiti investment in public buildings and housing in the Comoros, and Comorian e-passports would replace Article 17 passports (*Kuwait Times*, 12 July 2015). The Kuwaiti government's public version of its intention with the Comoros 'deal' was that it would solve the stateless status of the bidoon, allowing them to remain in Kuwait as legal residents – similar to what the UAE claimed to have done with the bidoon population in its territory.

Reporting on this question over the next 2 years was chaotic and frequently contradictory. Some government officers repeatedly declared that becoming a Comorian citizen would not put the Kuwaiti bidoon in danger of being forcibly relocated to the Comoros (*Kuwait Times*, 30 November 2015, and 19 March 2016), while in an interview with Abrahamian (2015) Mazen al-Jarrah said that bidoon with criminal records would be deported there, and that the deal would become compulsory for all bidoon (2015: 144–145). One of the MPs who travelled to the Comoros as part of the Kuwaiti delegation in 2016 said that the two countries started to discuss the relocation of the bidoon to the East African islands; however, the leader of the delegation denied that conversation occurred in the same article (*Kuwait Times*, 28 March 2016). Several months later, the Foreign Affairs Minister, Sheikh Sabah Khaled Al-Sabah, denied that there had been any deal with the Comoros to the press (*Kuwait Times*, 20 June 2016), while just the day before, the Kuwaiti newspaper *Al-Rai* was reporting that two Kuwaiti bidoon had been issued passports by a broker in Dubai (*Arab Times*, 19 June 2016). Based on diplomatic sources on the ground, Abrahamian (2015) claims that what kept getting in the way of the agreement between Kuwait and the Comoros was whether it would include forced relocation of bidoon into the Comoros – unlike in the case of the UAE where the program explicitly prohibited recipients of Comorian passports to live in the Comoros (Lori 2019).

Whatever the original goals were, by 2017 the plan had gone off the rails. A Comorian parliamentary commission uncovered deep corruption in the process of selling passports to the bidoon of the UAE and Kuwait, including $100 million in funds going missing and no meaningful investment in Comorian infrastructure (*Kuwait Times*, 26 March 2018). The two Comorian presidents involved in economic citizenship agreements with the UAE and Kuwait, as well as other state officials, have been suspected of embezzling public funds through the sale of Comorian passports. In November 2022, former President Sambi was sentenced to life in prison (*Al Jazeera*, 28 November 2022). Since the failure of the Comoros plan, the Kuwaiti government has returned to demanding bidoon 'reveal' their original citizenships in order to gain Kuwaiti citizenship – and stating that those who do not reveal their original citizenship will be ineligible for regularization (*Arab Times Online*, 9 September 2021).

Statemaking through citizenship and statelessness

The fluidity of the bidoon's situation since 1959 is tied up with the process of state-making through citizenship. Before 1986, the bidoon's status was 'unregulated'. The state

suggested they might have another unknown nationality but still granted them access to basic services, and used the tool of the Article 17 passport to allow them limited mobility. They lacked political rights, such as the ability to vote for the National Assembly, which began sitting in 1962 – but so did those who had citizenship by naturalization. They were not formally designated as stateless, as Kuwait had no determination mechanism.[5] Although the state did not recognize their belonging, neither did it directly deny it. The subtler lack of rights in this era produced a sort of passive statelessness, similar to Palestinians in Syria before the 2011 war: there was some social discrimination, and they lacked full rights to citizenship, including political rights, but they were essentially stable as members of the community.

This changed in 1986, when the state decreed that bidoon were instead 'illegal residents'. At this point, the state proclaimed that the bidoon do not belong to the national community. The progressive narrowing of access to rights we describe above *follows* this declaration, rather than being simultaneous with it. While the decree was tied to the expulsion of some bidoon understood as dangerous to state interests, the rest of the bidoon experienced its consequences piece by piece, as access to ID cards, education, health, and Article 17 passports were slowly taken away.

In the late 1990s and early 2000s, statelessness became problematized in the international agenda, and scholars and policymakers outside of Kuwait began to call attention to the situation of the bidoon. This meant that, in addition to demands from the bidoon for access to citizenship, the state had to contend with the opinion of the international community, to which it is highly sensitive, even if not always directly responsive.[6] A state that prides itself on social harmony and smooth management needed a response. But the mass naturalization of the bidoon, while technically and legally possible, would be costly (Tétreault 2000) and would involve treating citizenship as a universal right, rather than a reward for settled loyalty. Neither was appealing to the Kuwaiti state.

The Comoros solution provided the Kuwait state with potential options vis-à-vis the bidoon. Once the bidoon had citizenship in a country other than Kuwait, they could be managed like other non-Kuwaitis. If they became troublesome, they could be deported (logistically complicated and likely to invite criticism from human rights organizations when they are stateless).[7] Even if, like in the UAE, forced relocation ended up not being part of the agreement between Kuwait and the Comoros, the bidoon would no longer be 'stateless', so the international community might lose interest in the problem. For the bidoon themselves, the state could use a carrot-and-stick approach: the benefits of regularization and legal residency came with stability, a bundle of rights, international mobility, and the threat of relocation encourages compliance. As a form of regularization, it has the advantage of making it possible to request support and benefits. However, very few if any Kuwaiti bidoon ended up obtaining Comorian citizenship.

On one level, this scheme seems absurd because of its strong air of corruption, as well as the coercive means through which it would have been imposed on the bidoon. Citizenship by investment is a questioned practice when it is about individuals buying citizenship[8] –let alone when it is about states buying citizenship for entire groups.[9] In fact, this strategy of buying external citizenship may not even count as a form of citizenship by investment, a point made by Lori (2019) in her discussion of the UAE's deal with the Comoros, given the lack of consent of the recipients of the purchased citizenships and their loss, rather than gain, of mobility and privileges afterward.

However, this raises the question of whether any mass naturalization of stateless people in a country to which they are not connected would have been an adequate remedy. Giving the bidoon Comorian citizenship would allow them to cease being 'illegal residents' in Kuwait, and to become legal residents instead; rather than being stateless, they would appear as migrants, even if they have never migrated. But is the lack of legally recognized citizenship the real problem?

Affective attachments and the injustice of statelessness

That the bidoon are stateless is an injustice. That injustice is rooted in their lack of citizenship but is not solved by access to Comorian citizenship, or citizenship in another country (such as for those who migrate out of Kuwait to countries that allow naturalization). The injustice combines the lack of legal status and the rights that accompany it with a rejection from the political community to which they are most affectively attached. Any solution to the bidoon's statelessness that does not reinscribe them in the affective community of Kuwait will ring hollow.

This affective dimension of citizenship is acknowledged in international law through the genuine link principle, according to which

> nationality is a legal bond having as its basis a *social fact of attachment*, a genuine connection of existence, interests and sentiments, together with the existence of reciprocal rights and duties. It may be said to constitute the juridical expression of the fact that the individual upon whom it is conferred (...) is in fact *more closely connected with the population of the State conferring nationality than with that of any other State* (ICJ 23, emphasis ours).[10]

The genuine link principle conceptually links the idea of nationality to the substantive connection between a person and her country of nationality, whether that country is the person's place of habitual residence or a country where she has family ties or participates in collective life.

Although the literature on who should have the right to citizenship does not usually frame its arguments in terms of affect, [11] it does pay important attention to the role of affective attachments alongside the more material elements of citizenship. For instance, Shachar's (2009) concept of *jus nexi* moves away from the ascriptive criterion of birthright as a means of determining whether a person should qualify for citizenship in a given state, towards a focus on where her meaningful ties, self-identification, and community involvement are. 'Instead of asking whether a person happened to have been born in a given country ... the more significant set of questions under the *jus nexi* framework becomes where he or she actually lives, where his or her center of interests lie, and where, as a result, to place "the legal bond [of citizenship] having as its basis the social fact of attachment"' (169). Bauböck puts forward the notion of stakeholder citizenship and argues that '[s]elf-governing political communities should include as citizens those individuals whose circumstances of life link their individual autonomy or well-being to the common good of the political community' (Bauböck 2009, 479). Joppke (2007) names identity as one of the three key facets of citizenship, defining it as 'the behavioral aspects of individuals acting and conceiving of themselves as members of a collectivity' (38). The notion of self-identification, acting as members of a collectivity, and the depth of links

point to a major part of the immaterial value of citizenship: as a tangible marker of belonging.

Despite being persistently denied Kuwaiti citizenship, bidoon in Kuwait feel that they belong to Kuwait – that they *are* Kuwaiti, not foreigners attempting to join that community. As Beaugrand (2011, 228) says,

> *The bidoon* speak the same dialect as Kuwaitis. Most wear the same *dishdāsha*, iqāl, and *ghutra* though being usually regarded a distinguished privilege of Kuwaitis. They mingle with Kuwaitis of comparable social background, follow Kuwaiti politics, and recall Kuwait's history of urban development, naturalisations and demographic changes. Yet they are not Kuwaitis.

Likewise, a bidoon from Kuwait living in the UK said: 'Here in the UK we are equal with others before the law. In Kuwait, we have been demonized. We are the only ones who are both Kuwaitis and foreigners as well' (Shiblak 2011, 188). These conflicted feelings of belonging and rejection also resonate in the stories of the bidoon who were living in the (now dismantled) Calais refugee camp, in northern France: 'The area of the "jungle" housing the Bidoon is adorned with Kuwaiti nationalist graffiti. Kowaili [the person being interviewed] entered one shack and stood next to a drawing of the Kuwaiti flag. "My mother and father, my grandparents and theirs were born in Kuwait . . . you love the country you're from regardless of what it does to you", he said pointing out the opening verses of the state's national anthem written beneath it: "My country Kuwait, may you be peaceful and glorious . . . may you always enjoy good fortune"' (*Al Jazeera*, 29 March 2016).

Ghassan Hage (2009) uses the notion of the illusio, 'the way we invest and attach ourselves to those elements of the social world that give our lives a meaning' (68) to understand how political emotions are generated. For bidoon in Kuwait, the concept of Kuwait as a political community (a 'collectivity' in Hage's terms) serves as an illusio, 'something with which we imagine and reinforce the coherence of our personal identity' (71). In particular, Kuwaiti bidoon 'identify through' (71) Kuwait, not merely understanding themselves as having a relationship to the idea of Kuwait but seeing the world from the perspective of a Kuwaiti community. Despite lacking legal citizenship, contemporary bidoon consistently identify through the Kuwaiti state, which only intensifies the harm they experience when their membership is denied.

It is worth clarifying that an affective attachment is not synonymous with patriotism or a love for one's country.[12] Although a love of country is part of a normative narrative of citizenship, and those gaining citizenship through naturalization are compelled by the state to engage in rituals of loyalty towards it, affective attachments can also be painful or critical. What matters is not the type of affect, but that it is an *attachment* that organizes one's orientation towards the world. Even someone with a profound anger or loathing of their country can identify through it – the strength of the emotion is a sign of how deep their attachment is.

Affective attachment is a central part of the lived experience of citizenship, and explicit attention to it is missing in much theoretical work on who should have access to citizenship. In fact, the theories cited above are generally used to address membership questions relating to migration, such as when the descendants of those who leave a country should be entitled to citizenship, and when migrants should be allowed to

obtain citizenship. The bidoon are not migrants, and arguments that analogize them to migrants can fuel the exclusion they have been subjected to by reinforcing the Kuwaiti government's narrative that they are 'illegal residents' (Benswait 2021). However, by emphasizing the affective role of identification with a political community – Hage's *illusio* – in the creation of the nexus or stakeholder position that justifies membership in a political community, these theories can help us see why the bidoon need their *Kuwaitiness* acknowledged through citizenship, not just an end to their de jure statelessness. Comorian citizenship would produce not a resolution to their problem but a new kind of de facto statelessness: one where they lack both the effective protection of their nominal nationality, and where they lack recognition of their affective membership in their most important political community. [13]

When citizenship is not the answer

Although the situation of the bidoon is rooted in their specific context, we argue that the denial of affective attachment is a central component of the lived experience of statelessness and is experienced as a significant injury in many cases that do not exactly meet the legal qualification of de jure statelessness, but are highly analogous to it in effect. For instance, the Erased of Slovenia are a group of more than 25,000 people whose names were deleted from the registry of permanent residents in the early 1990s, when Slovenia became independent from Yugoslavia. Many were formally registered as citizens in other Yugoslav republics, meaning that, technically, they had access to citizenship. Practically, many of them were de facto stateless (Blitz 2006; Zorn 2013), lacking access to the protection of their countries of citizenship. But more to the point, they were denied continued permanent residence in and rejected from the place where they had lived and built lives. Many of the Erased have particular stories of their identification cards being destroyed, the state's refusal to register their names on their children's birth certificates, or general social exclusion. What the Erased demanded was the restitution of their permanent residence in Slovenia, as a formal acknowledgement of their existence and membership in their community. The fact that they could, in theory, 'return' to the country that was the successor state of their Yugoslav nationality, a state to which many had some kind of tie (such as birth there, family there, or a shared ethnicity), did not mean that they did not experience an injustice when their permanent residence was invalidated, because they experienced a rejection of their membership in a community to which they had been a member in the past, and to which they wanted to continue to belong. Citizenship in the successor state to a republic where they often had never lived or had left many years before the Erasure was as poor a solution to this problem as citizenship in the Comoros would be for the bidoon, despite the fact that their 'genuine link' to that state was much more substantial. [14]

Among the millions of Palestinians who are outside of Palestine, those resident in Lebanon and Syria are generally de jure stateless, while those who were displaced to Jordan between 1948 and 1967 for the most part hold Jordanian citizenship (El-Abed 2021). Therefore, it would be logical to assume that Palestinians in Jordan are not affected by statelessness. However, their Jordanian citizenship is consistently limited and threatened, such as when the 'refugee-citizens' who still live in neighborhoods designated as refugee camps face limited access to state resources and

restricted social mobility (Oesch 2017), or when they are subjected to random and punitive loss of Jordanian citizenship (El-Abed 2021). They simultaneously hold Jordanian citizenship and face constant threat of rejection from the Jordanian political community. In addition, they lack access to Palestinian citizenship, an identity and political community to which they are often deeply affectively tied, but which has no mechanism to recognize their membership. Again, having citizenship does not undo either harm.

Indigenous North Americans face a slightly reversed version of this problem, which shows the complexity of affective attachment to political communities and its relationship to citizenship. For much of settler statehood, Indigenous people could only obtain settler state citizenship if they abandoned citizenship in their Indigenous nation and assimilated to settler norms of behavior, dress, and work (Bruyneel 2004; Nichols 2014). This mechanism of citizenship worked alongside residential schools, forced displacement, and the reservation system to ensure that Indigenous people were not able to be comfortable members of settler political communities and that Indigenous communities were slowly undermined. Settler states also regulated who could be recorded as a member of an Indigenous nation, again undermining the ability of Indigenous peoples to exercise sovereignty over who constitutes their community. The ability to determine community membership and have it co-exist with membership in the settler state was a key demand for Indigenous political leaders throughout the 20th century and is now represented not only through settler-state documents, such as the Canadian 'status card', but through documents and processes embedded within Indigenous community and governance structures. For instance, Métis communities in several provinces have created policies governing hunting rights, and members of those communities can choose to hunt following those legal rules and guidelines, rather than those put in place by their province (Dubois and Saunders 2013). Similarly, Haudenosaunee citizens living along the US–Canada border may hold a Haudenosaunee passport, a document issued by the Haudenosaunee Confederacy (Lightfoot 2021). Those traveling with these passports have faced refusals from the Canadian and other governments to permit entry, insisting that individuals provide evidence of settler state citizenship; however, the continued use of these documents, as well as the organized use of these documents by Haudenosaunee political delegations and sports teams, is an act of insisting on the external recognition of this membership. If a given Indigenous person does not hold these documents, they are not stateless; they have access to Canadian or American citizenship by the laws of those political communities. But lacking an internally regulated and meaningful acknowledgement of their membership in their Indigenous nation constituted harm done to Indigenous people, one that access to settler-state citizenship does not substitute for – or these documents and practices would not exist.

These examples suggest that access to citizenship, even citizenship in a political community that is not entirely alien to you, cannot completely ameliorate the harms done by the denial of membership in a community to which you are affectively tied. In fact, being compelled to acquire or use one of these other citizenships is an additional harm which compounds the first one.

Conclusion

In *The Origins of Totalitarianism*, Hannah Arendt (1973) argues that the loss of membership in a political community reduces people to a status outside of humanity itself:

> Not the loss of specific rights, then, but the loss of a community willing and able to guarantee any rights whatsoever, has been the calamity which has befallen ever-increasing numbers of people. Man, as it turns out, can lose all so-called Rights of Man without losing his essential quality as man, his human dignity. Only the loss of a polity itself expels him from humanity. (297)

What the politics of the 'Comoros solution' allow us to understand is that approaches to statelessness that focus solely on the question of granting citizenship fail to resolve the underlying injustice. The bidoon's lack of citizenship is an important loss of rights, but they are more broadly refused access to the community with which they identify, and which has the greatest control over their life circumstances – and is, therefore, the community which has the capacity to render them as rights-bearing individuals. Receiving a citizenship that invalidates an already-existing affective attachment that the stateless person holds does not undo that affective attachment. Instead, it is experienced as a moral injury to that attachment – the severing of a strong bond. While stateless people who migrate may become affectively attached to another country (as any migrant can) in the process of acquiring citizenship in that country, this does not undo the moral injury they experience by being excluded from membership in the community to which they first experienced affective attachment. And citizenship that does not bring membership in a political community cannot be said to be citizenship in the proper sense of the word. We might also go further to say that one that alienates a person from the political community to which they are most affectively attached only doubles the loss of humanity they experience.

Affective attachment provides a broad and inclusive normative ground for citizenship which is not rooted in a liberal rights framework. This is important for states like Kuwait whose concepts of citizenship are not fundamentally liberal. However, it is also compatible with liberal theories of citizenship grounded in a person's relationship to a state, such as Shachar's notion of jus *nexi*, or Bauböck's notion of stakeholder citizenship. Above all, emphasizing the relationship between affective attachment and citizenship helps show why strictly legal approaches to the political problem of statelessness cannot produce lasting solutions.

Concretely, the statelessness of the bidoon has persisted for over 50 years. We strongly believe that no resolution to the bidoon's current status would be received as just by the bidoon themselves without containing a fundamental affirmation of their affective attachment to Kuwait. The simplest means for this would be the recognition of all bidoon as citizens of Kuwait; a broader solution to the problems inherent in Kuwaiti naturalization law would be the abolition of distinctions between original citizens and naturalized citizens. We recognize that this is an unlikely outcome in the near future, and perhaps in the long term as well. Nevertheless, we believe that insisting on the centrality of the bidoon's affective attachment to Kuwait, even amid all the injustices the bidoon have endured, is key to a positive outcome for all bidoon. A merely legalistic approach to the problem will only lay the groundwork for a less absurd (or more efficiently implemented) version of the Comoros 'solution'.

Notes

1. While we use the term 'statelessness' to refer to the situation of the bidoon, it is crucial to engage with this legal category in a critical manner, keeping in mind that its use carries political implications. For instance, members of the Rohingya community have pointed out that the use of the term 'stateless' to refer to them misrepresents their plight as survivors of genocide and obscures the illegality of their exclusion from citizenship. https://www.thene whumanitarian.org/interview/2022/11/10/Rohingya-Coxs-Bazar-Myanmar-citizenship-stateless

2. See Chatty et al. 2013 for reference to a parallel group of stateless bedu on the Lebanon/Syria border.

3. In this regard, the term 'bidoon' itself evokes a violent act of exclusion that founded the Kuwaiti state, and it inescapably carries a degree of violence (Benswait 2021).

4. Kuwait Times, September 21, 2017 and February 28, 2018; Arab Times, July 9 and July 14, 2019; Kuwait Times, September 12, 2019; Arab Times, June 22 and December 8, 2020; Kuwait Times December 28, 2020; Kuwait Times June 9, 2021 and Arab Times, June 10, 2021.

5. Bauböck (2014) argues that citizenship by investment corrupts the egalitarian nature of democracy. Because it targets the ultra-rich, 'it would tear down a wall of protection that keeps social class from becoming, once again, a formal marker of inequality of citizenship rights and status' (Bauböck 2014: 20).

6. Although not a case of a government buying citizenship for an entire group, the UK' five-year plan to send to Rwanda asylum seekers who entered the UK illegally, bears resemblance with what the UAE government did, and the Kuwait government was about to do, with the bidoon. The deal, which was ruled unlawful by the UK Court of Appeal in June 2023, entailed the payment by the UK government to Rwanda of £105,000 per person (BBC News, April 12; CBBC, June 17 and July 12, 2023).

7. According to the International Organization for Migration, a stateless person is an international migrant when he or she is 'outside his or her State of birth or habitual residence', (*International Migration Law No. 34: Glossary on Migration*, 2019: 112), which is not the case of the bidoon. For more on the difference between statelessness 'in situ' and statelessness in the context of migration, see Vlieks (2017).

8. 'Nepotism' is Meijer's translation of wasta – it might also be translated as 'connections', as we have done earlier in the article, which has fewer negative connotations.

9. Furthermore, Kuwait is not a state party to the 1951 Convention relating to the Status of Refugees and its 1967 Protocol, the 1954 Convention relating to the Status of Stateless Persons, or the 1961 on the Reduction of Statelessness, meaning that the legal framework of statelessness and asylum are not necessarily relevant or binding for Kuwait.

10. See Regan Wills (2013) for a discussion of this with regard to women's rights.

11. There is a broad literature on affective citizenship, most of which is concerned with the affective acts that constitute practices of citizenship (Fortier 2016) and how affect can be used to discipline citizens into particular affects or serve as the basis for forms of resistance (De Gregorio and Merolli 2016).

12. As an example, bidoon writer, scholar, and activist Mona Kareem, who has acquired US citizenship, was prevented in January 2023 from entering Kuwait to visit her family; her relationship to Kuwait was easier to reject when she held a US passport than it might have been if she were fully undocumented (Gulf Centre for Human Rights, January 2023).

13. The genuine link principle was introduced in a 1955 court decision by the International Court of Justice on the Nottebohm case (Nottebohm Case (second phase), Judgment of April 6th, 1955) and has since developed into a principle of international law. For a historical contextualization of the principle's emergence, see Siegelberg (2020).

14. In fact, both authors of this paper are migrants living as permanent residents without citizenship in their country of residence and hold a wide range of attachments to their

countries of origin and country of residence, none of which are as simple as love or loyalty.

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