

Attachment A: International comparison

Country	Legislation	Operation	Conduct conditions	Citizenship conditions
France	<i>Civil Code</i> (Article 25)	Council of State declares by decree that the person has forfeited their French nationality.	Person is sentenced for an offence that constitutes 'an infringement of the fundamental interests of the nation' or an act of terrorism (Article 25, 1°).	Naturalised dual citizen; offence must have occurred prior to or within 15 years of acquiring French citizenship (Article 25-1).
Germany	<i>Nationality Act</i>	Bill introduced in April 2019 to provide for automatic cessation of citizenship (non-retrospective) for dual citizens who fight for a 'terrorist militia' in a foreign country.		
Netherlands	<i>Dutch Citizenship Act</i> (Article 14)	Minister of Justice and Security may revoke Dutch citizenship.	Person is convicted of a terrorism offence under the Netherlands Penal Code or a war crime under the Rome Statute (Article 14(2)).	Person must not become stateless (Article 14(6)).
New Zealand	<i>Citizenship Act 1977</i> (Section 16)	Minister for Internal Affairs revokes New Zealand citizenship.	Minister for Internal Affairs is satisfied that the person 'acted in manner that is contrary to the interests of New Zealand' (Section 16 (a)).	Person must have acquired the citizenship of another country 'by any formal or voluntary act' (Section 16(a)).
United Kingdom	<i>British Nationality Act 1981</i> (Section 40)	Home Secretary makes order to deprive person of British citizenship.	Home Secretary is satisfied that deprivation of citizenship is 'conducive to the public good' (Section 40(2)).	Person must not become stateless; unless person is a naturalised citizen who has conducted themselves 'in a manner which is seriously prejudicial to the United Kingdom' and who the Home Secretary is satisfied could become a national of another country (Section 40(4A)).
United States	<i>United States Code</i> (Section 1481)	Person automatically relinquishes US nationality.	Person voluntarily (with the intention of relinquishing US nationality) commits an act of treason or conspiracy against the United States.	No requirement to establish dual citizenship.