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Residency and citizenship in the Gulf: recent policy changes and future implications for the region

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Abstract

Citizenship and residency laws in the Gulf Cooperation Council countries developed during a similar time period, with similar influences, and as a result had common characteristics. In recent years, this has begun to change, with new pathways to permanent residency and citizenship developing in the region. This paper takes a comparative case study approach to analyzing the policy changes in Saudi Arabia, Qatar and the United Arab Emirates, and then explores the implications thereof. Broadening the pathways for permanent residency and citizenship offers opportunities (e.g., reversing financial outflows, increasing domestic investment and savings, attracting foreign direct investment and skilled talent) while it also presents risks (e.g., contesting traditional forms of belonging and entitlement, reducing social cohesion, and creating new forms of inequalities). While new pathways have indeed emerged, these pathways are designed for specific types of people, defined by the criteria or requirements of them. The unique policies of the three countries imply unique directions for the economies, demographic transitions, and socio-political cultures of the region.

Keywords: Citizenship, Residency, Migration, Policy, Middle East

Introduction

Migration and citizenship policies, as well as the related questions of entitlements, inclusion and belonging, in the Middle East, and specifically in the Gulf Cooperation Council (GCC) countries, have been contested for decades. These questions have ranged from criticisms regarding the lack of pathways to citizenship and permanent residency, the challenges of talent recruitment and retention when residency is tied to specific employment contracts and to low levels of domestic expatriate investment (and conversely high levels of financial outflows; Babar, 2014; Rahman and Al-Azm, 2023; Sater, 2014; Zweiri and Al Qawasmi, 2021). The specificity of these questions for the GCC often relate to the high level of expatriate residents living in the countries, which constitute the majority of the population in most of the GCC member states. Available research aligns with this, such as a focus on motivations and challenges of expatriates (Babar et al., 2019; Kanna, 2010; Khalaf et al., 2015; Lori, 2019). However, Saudi Arabia, the UAE, and Qatar have begun to change their citizenship and residency policies, each in unique ways. This



article analyzes these changes and projects what the implications of these changes are, with regard to the demographics of the region.

A risk for countries with low or no pathways to citizenship is that declining domestic fertility rates will place greater burdens on a relatively smaller working age population while temporary expatriate workers have little to no incentive to invest in the country where they work. The emergent challenges (e.g., stable or declining citizen population and high financial outflows) have the potential to create path dependencies that have additional negative impacts, such as highly skilled workers opting to relocate to countries where they have greater stability (and conversely opting not to migrate to countries where stability is low). Changing the laws or options may not immediately change these path dependencies due to potential migrant perception as well as the socio-cultural institutions that create an accepting and welcoming environment for more diverse permanent forms of immigration. Governments of the region have the opportunity not only to create new pathways to permanence but also gain recognition for leading changes (the first mover advantage). Rapid and open immigration processes also have risks, such as creating greater government financial commitments than inputs (Marois et al., 2020), thus requiring carefully crafted policies in alignment with long-term socio-cultural, political and economic objectives. Each of the three countries in this study have its own unique context and history, which has shaped their policies in this area. In this paper, we explore the recent changes in citizenship and residency laws in Qatar, Saudi Arabia, and the United Arab Emirates. To provide a better understanding of these changes, we first look at the demographics and economy of the countries and then move on to the historical context of citizenship and residency. We then focus on recent changes, discussing these changes and the implications they have for citizens, residents, and the broader society.

Methodology

This study utilizes a comparative case study approach, whereby three cases (countries) are developed, in this case sharing many similar attributes while exploring the divergences in one specific domain. Comparative case study research has been widely used to examine if assumptions apply across different cases (Knight, 2001) and has been applied to compare governments (Barnhurst, 2005). In order to assess the cases, this article contextualizes the three countries using demographic, historical, political, legal and sociocultural sources. To construct these cases, similar data sets and data types were utilized, to improve comparability, and a general structure for each of the cases guided the collection of evidence. In addition to secondary data sets, we draw upon academic literature and legal documents. Since many of the legal changes are recent, we also utilize government announcements and some media reporting (this tracking was particularly useful during the research, as many changes took place in the region during 2023 when this research was undertaken. In order to answer the stated research questions of this study, we also move beyond comparative case studies (which primarily assess the past and present), so that we can provide insight into the future implications of the past and current decisions. This is a unique contribution of this study, as we are able to project what the past and present imply for the future, not only of the three country studies but also of the comparisons between them in the future, and of the region in general.

Research based on comparative case study approaches are always limited by the comparability of each case and the extent of detail that is included or excluded for comparison, and this study is no different in that regard. In the following section we have attempted to outline the most relevant similarities and differences of the three country case studies, in relation to the research question. Undoubtedly, additional factors could have been added, however given the scope of a publication of this nature we had to make choices of inclusion and exclusion for consideration. A second limitation of this study is that we have relied upon secondary literature, available data, legal documentation and media reporting and the implications are based upon our own assessment. We have not, but could have, conducted interviews or focus groups with experts and key stakeholders for validation. Future studies could add this form of evidence for validation of these findings. Another option for validation, which we were not able to obtain data to use for validation, would have been specific data on the people pursuing the new pathways to permanence in the three country case studies. If that data becomes available, such an analysis would be able to provide more specific insight into what sorts of applicants are applying for the various residence and immigration pathways. This study could have included other countries, particularly the other member states of the GCC (Bahrain, Kuwait, and Oman). This was not done primarily due to the limitations of space, but also because of more diverse economic, demographic, socio-cultural, and religious factors making for difficulties in the case study comparison method (specifically for the research questions undertaken). The selection of case studies for comparison was done on the basis of policy change (which has occurred in the three selected countries of the GCC), while sharing common traits of the GCC, but not based on a regional study (all GCC member states) or the specific attribute of demographic similarity (one of many potential attributes that could be used for inclusion selection for case studies) per se (despite the similarities noted below). Future research could also compare the directions of those nations and relate that to the results of this study.

Country case studies: Saudi Arabia, Qatar, and the UAE

In presenting the three country case studies, the first part of each case study outlines the demographics and economy, followed by an analysis (historical and contemporary) of citizenship and residency. The three countries included in this study are members of the GCC, share borders and historically had economic and family ties. The official religion of Saudi Arabia is Islam and Arabic its official language, however due to large and diverse expatriate populations faiths and languages are diverse in the region (each country studies provides more details on these specifics, see below). The hydrocarbon resources of the region have enabled relatively high individual incomes and high economic growth rates, with all three working to diversify their economies beyond sectors related to their hydrocarbon resources. However, in some regards the countries are different. During the era of European colonization, Qatar and the UAE were part of a British protectorate while Saudi Arabia was not. Saudi Arabia has a much larger population than the others, more than three times that of the UAE and more than ten times that of Qatar (see Table 1). Relatedly, Saudi Arabia is geographically much larger in size. While birth rates have declined in the UAE and Qatar, similar to the 'more developed regions', that of Saudi Arabia is similar to the higher world average, however that is projected to

Table 1 Population projections (medium variant), millions (UNSD, 2022)

Country	2020	2050	2100
Qatar	2.8	3.9	4.1
Saudi Arabia	35	45	42
UAE	9.9	10.5	9.0

Table 2 Fertility rates/live births per woman (medium variant), millions (UNSD, 2022)

Country	2020	2050	2100
Qatar	1.781	1.658	1.655
Saudi Arabia	2.393	1.884	1.725
UAE	1.443	1.495	1.585
'More Developed Regions'	1.528	1.637	1.674
World	2.314	2.149	1.835

change in the coming decades (see Table 2 and contextualization of this data below). Each of the three are discussed in detail in the follow sub-sections.

There are few nations in the world that have as high a percentage of the population of expatriates as the Gulf nations (the specifics are noted in the country sections that follow). This context can create challenges when analyzing demographic data (as in Tables 1 and 2; see Shah, 2017). Take Qatar as an example, where citizens make up an approximate 12% of the population and where expatriates are the majority: the fertility rate listed by the United Nations is an aggregate figure of the citizen and resident population, which alters the fertility rate due to a large number of adults (both male and female) who are working in the country without their families and/or are unmarried. The official fertility rate of Qatari women in 2020 was 2.5 (PSA, 2020), while the United Nations data (as shown in Table 2) lists 1.781. That is not to suggest the data is incorrect per se, rather it is to clarify who the data includes, and the limitations and/or meaning of these datasets. In the case of Qatar, both the total population fertility rate and the citizen fertility rate are declining, and thus the general point about a declining trend remains.

Saudi Arabia

Demographics and economy

Within the GCC, Saudi Arabia is geographically the largest and has the largest population. It has a population of approximately 35 million people (World Bank, 2023). More than a third of Saudi's population is made up of expatriates. In 2021, the expatriate population was 13.49 million. The majority of the population is under the age of 30, with a median age of 30.8 years (World Population Review, 2023). Saudi Arabia is home to the largest economy in the GCC, with the oil and gas sector being the primary driver of economic growth (46% of GDP and nearly all export revenues; Trading Economics, 2023). However, the government is working to diversify the economy, and it is doing so by investing in sectors such as tourism, technology, and renewable energy (EpoD, 2019). These diversifications are outlined in the 2030 Vision, for which foreign investment (and enablers thereof) is expected to play an important role. However, the country faces

some challenges, despite having a large and regionally strong economy, of which youth unemployment is primarily (Al Naimi, 2022; Bakry et al., 2019). This relates to questions of citizenship and residency, as the former gain significant benefits (e.g., in education, healthcare, and housing) while relaxed immigration pathways might attract negative feedback from a large population of unemployed or underemployed youth.

Citizenship and residency

The concept of citizenship and residency in Saudi Arabia has a complex historical background that can be traced back to the time when society was organized around families. Before the establishment of the modern state, the Arabian Peninsula was divided into several small family-based organizational units, and citizenship was based on the kinship system. The initial phase of citizenship acquisition in 1954 was primarily determined by residency in the territory before the end of Ottoman rule, which continued until 1926. During this period, individuals who had lived within the boundaries of what later became Saudi Arabia between 1914 and 1926, and who did not possess foreign citizenship, could request Saudi citizenship until 1955. Minors had slightly more time, until they reached the age of 19. This differs significantly from the current citizenship policies based on other provisions of the Saudi Arabian Citizenship System (SACS), where the main path to citizenship acquisition is through patrilineal descent (Alsabeehg, 2022; Alsabeehg & Kuzmova, 2022). For much of Saudi history, citizenship in Saudi Arabia was granted only to those who were members of the royal family or who had kinship affiliations. It was not until the 1950s that the country began to introduce formal laws and regulations governing nationality and naturalization. The Saudi Arabian Citizenship System (SACS), the official title of the citizenship law, has been amended five times since its enactment. The amendments are made by the Council of Ministers, also known as the Cabinet, which includes senior government ministers, the King, and the Crown Prince (Alsabeehg, 2022).

Until recently, Saudi Arabia had very strict citizenship and residency policies. Citizenship was only granted to those born to Saudi fathers, and there was no pathway to citizenship for non-Saudi residents (Alsabeehg, 2022; Saikali, 2023). Saudi Arabia's citizenship policy has significant implications for women. Since the country's citizenship is primarily passed down from the father, it can lead to situations in which children of Saudi women and non-Saudi men are not granted citizenship. In 2018, approximately 700,000 female citizens were married to non-citizens, constituting around 10% of married female citizens (Saikali, 2023). This choice of marriage partner has shifted in the most recent decade, as in 2013 less than two thousand marriages occurred between female citizens and male non-citizens, as per those registered in Saudi courts (Saikali, 2023). With these legal shifts, it is expected that this change to marriage patterns will continue, as societal attitudes towards mixed-culture marriages are more accepted, as well as the high cost of marriage rites expected within the Saudi community deter some from marrying citizens (Saikali, 2023). Not providing citizenship to children of such households leaves children in a stateless situation or the citizenship of the father, either of which impact their access to basic services such as healthcare, education, and employment opportunities and could result in a situation where the children of Saudi women were denied access to their own country

and cultural heritage (Human Rights Council, 2023). In 2023, Riyadh amended Article 8 of the Saudi Arabian Nationality System, allowing the children of Saudi citizens to become eligible for citizenship when adults (age 18). The eligibility criteria include being above the age of 18, reside permanently in the country, not having a criminal record, and being able to fluently speak Arabic (Saikali, 2023). Given the number of marriages (700,000), this nationality reform may have significant demographic implications, and may further encourage mixed-culture marriages in the future.

Other changes have taken place within the last five years to that have increased the residency options (Khaleej Times, 2023). For example, in 2019 Saudi Arabia introduced a new residency scheme called the "Privileged Iqama" (Green Card) program (Al Shurafa, 2019) which creates a pathway for people to live and work in the country without needing a Saudi sponsor. This move marks a change to Saudi's Kafala (sponsorship) system, which previously tied expatriate workers to a single employer, preventing them from changing jobs or traveling outside the country without their employer's permission. The reform is primarily catered towards wealthy investors and businessmen to increase demand in the real estate sector and promote foreign investment. The eligibility conditions for this scheme include having a valid passport, being at least 21 years old, providing a credit report, having no criminal record, and being clear of infectious diseases (Migrant Rights, 2019). The focus of the new policy is on attracting skilled talent and foreign investment. The government hopes that by making it easier for skilled workers and investors to live and work in the country, they will be able to attracted and retain international talent, and thereby support the diversification of the economy.

In addition to the Green Card program, Saudi Arabia has also made it easier for foreigners to obtain work visas and visit visas. The government has implemented new online systems for visa applications and has reduced the amount of time it takes to process visa requests (eVisas are available for nationals from 49 countries and can be issued virtually within minutes, alongside medical insurance; Saudi Gazette, 2022). This has made it easier for businesspeople and tourists to enter the country and contribute to its economy. Saudi Arabia's Ministry of Tourism announced that more than one million eVisas had been issued in years since its 2019 launch (Saudi Gazette, 2023). Riyadh is also planning to implement a new law for real estate ownership by foreigners. This announced changes to the current law will expand options for real estate ownership, allowing foreign ownership of all kinds of real estate (not limited to residential, also commercial and agricultural; Saudi Gazette, 2023). As this article goes to print, Saudi Arabia has further expanded residency pathways including this investment pathway (Arab News, 2024).

To attract and retain talent in the areas of Islamic scholarship, medicine, science, culture, sports, and technology to help achieve the Vision 2030 goals, Saudi Arabia has also introduced a naturalization program for foreigners with exceptional skills (Nicolaou, 2021). The government has granted citizenship to a small number of long-term foreign residents, including doctors, clerics and academics (Reuters, 2021). This is a significant step towards a functional naturalization process in the form of a citizenship pathway. Even if the number of people granted citizenship is limited to-date, these changes represent a significant shift towards for Saudi Arabia, one that has the potential to have a positive impact on the country's economy and global reputation.

In addition to skilled workers, Saudi Arabia is also trying to attract foreign investors through its citizenship policy changes (Al-Sharif, 2023). The government has implemented several reforms aimed at making it easier for foreign businesses to operate in the country. In 2019, Riyadh announced new regulations allowing foreign investors to own 100% of companies in several sectors, including renewable energy, engineering services, and management consulting (Reuters, 2019). Additionally, foreign investors can now own up to 49% of companies in the entertainment, education, and health sectors (Kane, 2019). These changes are part of Rivadh's broader efforts to attract foreign investment and diversify its economy. This has helped to create a more favorable investment climate in the country and has attracted interest from international companies looking to expand into new markets. As part of the country's efforts to attract foreign investment and diversify its economy, and according to the country's Vision 2030 plan (with ambitions to transform the country), 44 international companies have moved their headquarters to Riyadh (Barbuscia & Azhar, 2021). The companies reportedly represent a variety of sectors, including finance, technology, and renewable energy, and have chosen to relocate to Saudi Arabia due to its strategic location, business-friendly environment, and attractive incentives. The move is expected to boost the country's economy and enhance its global reputation as a destination for foreign investment and business opportunities (Barbuscia & Azhar, 2021).

Given the relatively stability of residency and citizenship laws for several decades, the changes that have taken place in the last five years are significant and signal a major change for Saudi Arabia. Granting of nationality to the children of Saudi women married to non-citizens has the potential to alter not only the demographics of the country, but also the norms of marriage. More opportunities for semi-permanent and permanent residency (via investment, skills, or business) provide new pathways for stability for non-citizens to live and work in the country. While the granting of citizenship has been limited to-date, that this is occurring is also a signal to new notions of citizenship in Saudi Arabia. Overall, Saudi Arabia's new residency and citizenship policy changes are aimed at attracting skilled and wealthy foreigners who can contribute to the country's economy and help to diversify it away from its dependence on oil, the success of these policy changes are yet to be seen. By offering long-term residency and other benefits to these individuals, the government hopes to create a more welcoming and inclusive society that can compete on a global stage.

Qatar

Demographics and economy

Qatar is a geographically and demographically small country, with a population around 3 million who almost entirely live in or around the capital city of Doha (Cochrane & Al-Hababi, 2023). According to the World Bank, Qatar has one of the highest levels of GDP per capita globally, enabled by its vast reserves of natural gas (World Bank, 2023). Qatar's economy is largely dominated by the oil and gas industry (it is one of the world's largest exporters of liquefied natural gas). For example, in 2018, hydrocarbons and related products accounted for over 90% of the country's total export earnings (Brookings Institution, 2021). However, the country has made efforts in recent years to diversify its economy, investing in infrastructure (e.g., new airport, seaport, roads, and large-scale

projects for the FIFA World Cup 2022), education, real estate, and tourism, with its 2030 National Vision aiming to transform into a knowledge-based economy. Despite facing some economic challenges in recent years, including a blockade by neighboring countries, Qatar's economy has remained relatively stable, and the government has continued to invest in the country's long-term development.

The State of Qatar presents some unique challenges when it comes to its population, as has been explored by others (Cochrane & Al-Hababi, 2023). For example, the majority of the population ($\sim 87\%$) are non-nationals, there was a significant increase of workers in relation to the FIFA World Cup 2022, and due to atypical gender and age divisions of the entire resident population the application of normal population scenario models do not apply for the country (Abu-Ras et al., 2022). In 1990, the population of Qatar was around 0.5 million, however following the development of the natural gas industry in the mid and late 1990s, the population began to rise rapidly. By 2010, the number of people living in the country had risen fourfold and surpassed 2 million (World Bank, 2023). In the mid- to late-2010s, the population began to stabilize around 2.8 million (PSA, 2022). The United Nations scenario suggests the population will grow in the long-term and will stabilize around 4 million (UNSD, 2022). However, in the short-term, following the FIFA World Cup 2022, it is expected that population will decline. The country has a high level of urbanization, with almost all of its population living in urban areas. As of 2023, the population is young, with a median age of 33 years (World Economics, 2023) and is the important role of expatriates in the workforce is expected to continue into the long-term (Kenny, 2021).

Citizenship and residency

Citizenship in Qatar has evolved over time. Prior to the discovery of oil in the 1940s, Qatar was a small state with trade and pearl-fishing on the coasts and seasonal pastoralists in the interior with livestock-based livelihoods. The concept of 'citizenship' was not well-defined before independence, and the government relied on tribal affiliations and informal agreements to govern the population. With the discovery of oil in 1939, Qatar's economy began to grow, and the government began a process that would eventually formalize its citizenship policies. In 1971, Qatar gained independence from Britain, and the government began to issue citizenship documents to those who could prove their ancestry in the country. Over time, the requirements for citizenship became tighter, with the government emphasizing the importance of Qatari heritage and culture. Some people have become naturalized citizens, however this was not a formalized process and it is not clear how many people of the current citizen population were naturalized after 1971.

According to current Qatari nationality laws, citizenship is not automatically granted to individuals solely based on being born in Qatar (*jus soli*, birthright citizenship), but rather through *jus sanguinis*, which is based on parental or ancestral lineage. Only individuals who resided in Qatar before 1930 and can provide proof of such residency are granted automatic citizenship (Babar, 2014, p 441). The details of this are mentioned in Law No. 2 (Article 8) of 1961 and Law No. 38 (Article 16) of 2005, wherein the citizenship law was amended restricting the political rights of naturalized citizens (Zweiri and Qawasmi, 2021, p. 41). However, Qatar's citizenship law underwent significant development with the introduction of Article 2 in the 2005 Act, which allows for naturalized

citizenship through a process of application to the emir, whereas prior legislation limited naturalization to the discretion of the Emir. According to the amended citizenship law (Law No. 38 of 2005), foreign nationals may be eligible for Qatari nationality if they have resided in Qatar for at least 25 years and have demonstrated good conduct and behavior. They must also have a valid legal status in the country, a means of supporting themselves and their families, and knowledge of the Arabic language. Individuals with a naturalized father are also classified as naturalized and these legal revisions provide limits to the number of total people naturalized annually, limiting to fifty (Al Meezan, 2023; Middle East Forumm, 2023). The law also sets out certain restrictions on dual nationality, and requires applicants to renounce their previous nationality as a condition of acquiring Qatari nationality.

Qatar's citizenship laws are highly guarded and exclusionary, with strict conditions for acquiring Qatari nationality. Article 38, which concerns the determination of original Qatari nationality, places a challenging requirement of evidence to show continuous residency between 1930 and 1961. Proving one's Qatari origins is ambiguous and places a significant burden on applicants (Babar, 2014). Qatar's nationality law creates distinctions between different levels of citizenship, with native or original Qataris having more rights than those who acquire citizenship through naturalization (Babar, 2014), which differentiates how citizens can engage with the government and gain access to goods and services provided by it. There remain legal differences for those classified as naturalized citizens, which includes inequalities of benefits as well as political participation. The children of naturalized citizens inherit this status, creating two distinct tiers of citizens. Those who have been naturalized also face the risk of having their nationality revoked, as per the 2005 Act, under circumstances such as providing false information during the application process or being convicted of a crime (Babar, 2014, p. 415). Also, Qatari women do not have an inherent right to pass their nationality onto their children under the current nationality law. The original law from 1961 did not allow for citizenship to be passed to the children of female citizens who married non-citizens. However, the 2005 law alters the previous legislation, as it permits such children to seek citizenship via the naturalization process (with the same eligibility criteria set in Article 2). However, it is not the case the children in such cases are treated as expatriates. In fact, minor children can get documents for travel, and to an extent are treated as citizens, such as in the provision of services (education, healthcare, and some employment advantages). They also get priority towards acquiring Qatari nationality.

In terms of residency, Qatar introduced a new residency scheme called the "Permanent Residency Permit" program. The Qatari Permanent Residency Law No.10 of 2018 allows non-Qataris to obtain permanent residency if they meet certain criteria. This includes a minimum of 20 years of residence for non-national applicants who are born outside the country, and 10 years for those born in the country, a legitimate means of earning a living, good behavior with no previous convictions, and a good knowledge of the Arabic language (Hukoomi, 2021). Permanent residency holders in Qatar have access to public health and education services, and are allowed to purchase leasehold and freehold real estate properties for investment and residential purposes. Such individuals also gain the right to start companies and/or invest in sectors of the economy that would otherwise require a citizen partner (Hukoomi, 2021). The government of Qatar has made changes

to Law No.1 of 2019 to attract more foreign investment, such as laws that allow foreign ownership in most economic sectors and regulate foreign real estate investment and ownership. There are also organizations that offer incentives to foreign investors, such as tax breaks and investment funds for small- and medium-sized businesses, with expectations of continued government spending creating economic opportunities (Department of State, 2023). The recent decision by Qatar to allow foreigners to own real estate properties is expected to boost Foreign Direct Investment (FDI), specifically within the rapidly developing real estate market (for residence or investment purposes). Legal provisions that enabled ownership opportunities, and thereby residency pathways, for non-citizens outlines the limited geographic areas and terms of these opportunities. These initiatives are being supported by governmental agencies, such as the Ministry of Justice and the Ministry of Interior (Gulf Times, 2020).

Modified naturalization and residency pathways are likely to have implications for the future of Qatar, however the pathways remain restricted. For those married to noncitizens, the route to citizenship remains lengthy and expatriate invest largely revolves around investment (via property for foreign direct investment in business), effectively attracting residents with wealth and/or access to capital. Given the small population and geography of Qatar, there may be challenges associated with integrating expatriates into Qatari society and ensuring that they are able to fully contribute to the country's development. Additionally, there may be concerns about the potential impact of foreign investment on Qatar's culture and traditions. Overall, the future implications of these changes will depend on how effectively the government is able to manage the challenges and opportunities associated with them.

UAE

Demographics and economy

The UAE is a federation of seven emirates, with a population of approximately 10 million people, and has become one of the Middle East's most important economic centers (BBC, 2023). The demographics of the United Arab Emirates (UAE) have been shaped by a rapid increase in population driven by a high number of expatriates. The majority of the population (~80%) are expatriates, and include a diversity of nationalities and socio-religious backgrounds (Alexander & Mazzucco, 2021) and reside in the country with varied legal conditions (Jamal, 2015). The majority of non-nationals, around 59.4%, come from South Asian countries such as India (38.2%), Pakistan (9.5%), and Bangladesh (2.3%) (CIA, 2023). Emirati citizens are a small minority group in the country (11.6% of the population), but they hold a significant role in the UAE's governance and economic development (Heard-Bey, 2005).

The UAE's economy is highly diversified, with significant contributions from the oil and gas sector, which accounted for approximately 30% of GDP (International Trade Administration, 2022). The UAE has taken steps to diversify its economy and reduce dependence on oil and gas by investing in other sectors such as tourism, finance, and technology. Within the Middle East and North Africa, the UAE attracts the largest FDI flows (31% of the total FDI to the region, or \$66.6 billion; MOEC, 2023). Entrepreneurs and investors are attracted to the UAE in part due to its ease of doing business, with registration being processed quickly and free zones providing supportive services (Sagar,

2022). This approach has helped the country to maintain its economic growth even in the face of fluctuations in oil prices. The UAE's strategic location as a hub for trade and commerce between Asia, Africa, and Europe has also contributed to its economic success.

Citizenship and residency

The country's history of citizenship and residency can be traced back to the formation of these individual emirates and the social and political structures that developed within them. In the pre-oil era, the UAE was a collection of small, independent emirates with different social and political structures. The inhabitants of these emirates were organized primarily around kinship affiliations, and citizenship was not a formal concept. Local leaders, known as *Sheikhs*, were responsible for administering justice, maintaining order, and providing protection to their subjects. The discovery of oil in the 1950s and 1960s dramatically transformed the social and economic landscape of the region (Ulfstein, 2022). In the UAE, citizenship was initially granted based on descent from one of the original families of the emirates. The consolidation of citizenship regimes in the UAE coincided with broader changes in the region. The formation of the Gulf Cooperation Council (GCC) in 1981 brought together the countries of the Arabian Gulf region, including the UAE, and led to the development of a common legal framework for citizenship and residency. The GCC countries all share common historical, cultural, and linguistic ties, and the development of a unified framework for citizenship and residency was seen as an important step towards greater regional integration (Ulfstein, 2022).

The naturalization process is stringent in the UAE. The law allows foreigners to become citizens of the country after a minimum of 30 years of residency in the UAE, subject to certain conditions. Exceptional candidates such as doctors, investors, scientists, creative minds, investors may be nominated by the Royals and officials for citizenship. The naturalization process is not automatic, and each application is reviewed on a case-by-case basis (Immigrant Invest, 2023). The country's population is made up of a large number of migrant workers, many of whom have lived in the country for decades without formal legal status. The issue of statelessness, in particular, has been a persistent problem. In the mid-2000s, the government launched a campaign to identify and register stateless individuals, known as "bidoon," by providing them with identification documents, and the granting of citizenship to a limited number of individuals. However, according to the Report on Bidoon in the UAE, which was published on the website of the Geneva Council for Human Rights Advancement (GCHRA), these initiatives have not been successful in resolving the problem of statelessness, and that Bidoon continues to face discrimination and marginalization (Geneva Council, 2019).

In recent years, the UAE has taken steps to address some of these issues around citizenship. The President of the UAE, Sheikh Mohamed bin Zayed Al Nahyan, has recently issued a directive to address the challenges faced by children with Emirati mothers and non-Emirati fathers in obtaining citizenship (Khaleej Times, 2022). Currently, these children do not automatically qualify for citizenship. The directive aims to improve their rights by granting them equal access to healthcare and education benefits enjoyed by other citizens. Although the exact details and impact of the directive are yet to be clarified, it is seen as a positive step towards resolving the issue (Abbas, 2023). The country

has also launched a number of initiatives aimed at attracting wealthy and talented individuals to live and work in the UAE. One such initiative is the UAE's Gold Card residency program, launched in 2019, which offers long-term residency visas to investors, entrepreneurs, and highly skilled professionals. The demand and issuance of the Golden Visas has continued to rise, which focuses on investors, entrepreneurs, and skilled professional; almost 80,000 Golden Visas were issued in 2022, a 69% increase compared to 2021 (Abbas, 2023). A similar rise was seen in long-term residency visas (Abbas, 2023; Abu Baker, 2022). The program is part of the UAE's efforts to diversify its economy beyond oil and gas and attract foreign investment. In addition to the Gold Card program, the UAE also offers several other residency options, including the 10-year renewable residency visa for investors and the 5-year renewable residency visa for retirees. These programs aim to make it easier for foreigners to live and work in the UAE, with the ultimate goal of attracting more foreign investment and boosting the country's economy (Alsabeehg & Kuzmova, 2022). To support the investment pathways, the UAE has also established several free zones, including Dubai International Financial Centre (DIFC), Abu Dhabi Global Market (ADGM), and Dubai Silicon Oasis (DSO), which offer various incentives to businesses, including full foreign ownership, tax exemptions, and rapid business registration processes. These free zones have attracted many international companies and entrepreneurs, contributing to the UAE's reputation as a businessfriendly destination.

To ensure that it continues to attract highly skilled immigrants and to attract the business community, the UAE has launched various initiatives, such as the Gold Card program, to make it easier for foreigners to live and work in the country. The establishment of free zones has also contributed to the UAE's reputation as a business-friendly destination. Such programs have been successful in attracting a diverse group of immigrants, including wealthy individuals, investors, entrepreneurs, and skilled professionals. The UAE has been a leader in the region regarding changes to citizenship (e.g., for children of female citizens married to non-citizens) and expatriate residency options, giving it an image of being more inclusive and open, which has contributed to the UAE attracting significant FDI inflows. Attracting and retaining talent in the UAE also has a regional competitive advantage, as there are more flexible options for talented applicants, in addition to those who have wealth and/or access to capital (the former group have the potential to add to the economy via their talents, while the latter contribute larger as consumers).

The Future Implications of Changing Citizenship and Residency in the Gulf

The development of formal citizenship policies in the three countries occurred during a common time period (1950–1970s), and via GCC collaboration contained common characteristics (Alsabeehg & Kuzmova, 2022). However, the three GCC countries of Saudi Arabia, Qatar and the United Arab Emirates have significantly changed residency and citizenship policies in recent years. The new policies alter, to an extent, traditional forms of belonging and inclusion (Ras et al., 2022), and have the potential to contest and recreate not only ideas of who belongs, but also the broader social contract regarding entitlements. This article surveyed the changes and reflects (in what follows) on the implications thereof. Additional research is needed to better understand the drivers of these changes,

which appear to include a mixture of pressure to align with international practices (e.g., passing of citizenship by both parents), efforts to attract FDI (e.g., investment and business pathways for residency), and recruitment and retainment of skilled talent (e.g., residency visas without the requirement of employment or sponsor). Notably, the types of inclusion (pathways to residency and citizenship) in all three countries remain narrow and targeted, such as with specific ties to the country and/or having wealth or specific skills.

The three countries, while making changes, have done so in unique ways, which allows for an assessment of what these changes might imply for future demographics, economics, and broader ideas of belonging. Appendix 1 summarizes the main changes in the three countries, providing comparative context to the policies. For example, Qatar's permanent residency program is relatively exclusive, while the UAE has introduced a more flexible long-term visa system and the potential for citizenship, and Saudi Arabia's Green Card program also offers several benefits, but it does not provide a path to citizenship. Considering who is eligible for these programs, the policies in Qatar are designed to attract people with wealth, and who are able to purchase properties or establish businesses, however those without the ability to make such investments remain in precarious situations having residency tied to a specific employer. The Green Card of Saudi Arabia, in practice, is rather similar, as it has an upfront cost of \$213,000 (comparable to the entry tier of real estate investment in Qatar of \$200,000 for residency). In both cases, the programs are designed to attract applicants who have wealth. While the UAE also has residency-by-investment options, it also has pathways for residency based on qualifications rather than wealth (e.g., the Golden Visa). The design of this program seeks to attract specific types of skilled talent, and facilities living within the UAE (this is explicit from the program application, which describes the program as enabling talented foreigners to live in the country). The implications are that those with established wealth may invest in Saudi Arabia and Qatar, supporting the economy with FDI, while the UAE is better suited to attract and retain younger skilled talent (who may not have the wealth to be able to invest in properties). The establishment of residency and citizenship pathways via investment are not only occurring the GCC, but globally, and research is needed in cross-regional contexts to better understand the similarities and differences in motivating the establishment of these programs.

A second major change in Saudi Arabia and the UAE is the passing of citizenship through both the mother and father, which in the case of Saudi Arabia appears to have significant demographic implications (as noted above, as of 2018, approximate 10% of marriages, or 700,000 female citizens, were married to non-citizens (Saikali, 2023). In both cases, this has the potential for socio-cultural and political changes as the demographic landscape of citizens broadens beyond the traditional forms of belonging (Ras et al., 2022). Since these changes are new, their implications are unknown. It remains to be seen to what extent marriages will change in these two countries, with the newfound possibility of citizenship, or if this will remain as a minority of marriages. Future research will not only need to monitor these changes, but also how those newly granted citizenship are included, if the traditional forms of belonging being to change, and how these changes alter the social contract with regard to entitlements. One area where this type of pathway may be expanded (and called for; e.g., Al-Ansari & Zahirovic, 2021) is the offering of residency and citizenship to expatriates born in the country and/or those living in

the country for multiple generations. There are already some benefits for such individuals (e.g., eligibility for educational and scholarship opportunities, amongst others) and this may be a pathway that is expanded in the medium term (meaning, in addition to the categories of individuals eligible via the skills or wealth pathways noted above).

The broader pathways to permanence are likely to attract a range of individuals, from highly-skilled professionals and investors seeking investment opportunities to retirees and elites seeking vacation properties. These changes may not make the region more diverse, given its high level of existing diversity, however it has the potential for non-citizens to make the region home. As these individuals feel a stronger connection to where they live (as opposed to temporality common in decades past), new questions of integration, diversity and social cohesion may arise. At the same time, the changes in citizenship and residency laws could have a significant impact on the labor demands in these countries. With many highly skilled professionals now eligible for long-term residency or citizenship, the domestic labor force may be able to increasingly fill roles in fields such as engineering, healthcare, and technology. However, with continued high demands for low- and semi-skilled workers, who are not included in these expanded citizenship and residency programs, this component of the workforce is likely to continue to be expatriates on precarious work contracts tied to employers.

The changes in citizenship and residency laws in the UAE, Qatar, and Saudi Arabia will have significant implications for the type of population that will call these countries home in the future. The changes in citizenship and residency laws in the UAE, Qatar, and Saudi Arabia reflect a broader shift in the region towards a more open and diverse society, albeit with differing objectives and thereby forms of belonging. One risk of these changes is that there could be tensions between newly naturalized citizens and long-time residents, or conflicts between different cultural groups. Another is that the inequality gap between citizens and (permanent) residence widens with those expatriates having more temporary forms of residence. In parallel to creating these more inclusive residency and citizenship policies, governments need to proactively be attentive to these risks and facilitate integration and cohesion. Conversely, the possibility of permanence has the possibility to reserve some financial outflows, increase domestic investment and savings, and attract new investment and talent, all of which have the potential to support economic growth. Ultimately, the future implications of changing citizenship and residency laws in the UAE, Qatar, and Saudi Arabia are complex and multifaceted. While they could bring new opportunities and challenges to the region, the full extent of their impact will depend on how they are managed.

Appendix 1Case study comparison of citizen and residency policies

Policies	Qatar	Saudi Arabia	UAE
Citizenship Automatic citizenship	Based on parental lineage Only for individuals who resided in Qatar before 1930 and can provide proof of such residency	Based on parental lineage For children born to a Saudi father or to a Saudi mother and a non-Saudi father, provided the mar- riage was approved by the Ministry of Interior	Based on parental lineage Children of Emirati men are automatically entitled to UAE citizenship

Policies	Qatar	Saudi Arabia	UAE
Naturalization	Possible after 25 years of residence, good conduct, legal status, financial stability, and knowledge of Arabic language	Possible after a residence period of 10 years for some categories such as investors and some profes- sionals	Foreigners can become citizens of the country after a minimum of 30 years of residency in the UAE, subject to certain conditions. Exceptional candidates may be nominated by UAE royals or officials
Women's rights	Women do not have an inherent right to pass their nationality to their children	Women can pass on their citizenship to their chil- dren if married to a non- Saudi, with the approval of the Ministry of Interior	Children born to Emirati mothers and foreign fathers are not entitled to UAE citizenship Emirati mothers can apply for citizenship for their children provided their child has lived in the UAE for six years. When the child turns 18, they can apply themselves. The process is complicated and long
Dual nationality	Applicants are required to renounce their previous nationality	Dual nationality is not recognized, and citizens who acquire another nationality may lose their Saudi citizenship	Dual citizenship is permitted since 2021
Second-class citizenship	Naturalized citizens have limitations on their access to social and economic benefits as compared to those who are Qatari nationals	Naturalized citizens have equal rights to Saudi citizens	Naturalized citizens have equal rights to UAE citizens
Residency	Introduced a Permanent Residency Permit program that grants permanent residency to expatriates who have lived in the country for a significant period of time and have made significant contribu- tions to the country	Introduced a residency program for certain cat- egories, such as investors and some professionals, that grants a residency permit for a period of up to 10 years, renewable upon conditions	The UAE has recently introduced several residency programs aimed at attracting investors, entrepreneurs, and highly skilled professionals to the country. These include the Golden Visa program and remote work visa program

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AA led the research, writing and analysis; LC conceptualized the paper, supported the methodology design, and contributed to the writing and analysis.

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All data used in this paper is cited in the bibliography.

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Competing Interests

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