



Immigration and Nationality Law in East Africa

Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications

Abraham Kuol Nyuon (Ph.D)^{1,2,3}

¹ Associate Professor of Politics, Peace, and Security

² Principal, Graduate College, University of Juba

³ SUSI Scholar on U.S. Foreign Policy

Correspondence: nyuonabraham@gmail.com

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Author notes

Abraham Kuol Nyuon (Ph.D) is affiliated with Associate Professor of Politics, Peace, and Security and focuses on Business research in Africa.

ABSTRACT

This article examines Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications with a focused emphasis on Comoros within the field of Business. It is structured as a working paper that organises the problem, the strongest verified scholarship, and the main analytical implications in a concise publication-ready format.

The paper foregrounds the most relevant institutional, policy, or theoretical dynamics for the African context and closes with a practical conclusion linked to the core argument.

Keywords: *East Africa Citizenship, Africa Citizenship Residency, Free Movement Fiscal, Movement Fiscal Dimensions, Nationality Law, East Africa*

Article Highlights

- Examines fiscal mechanisms within Comoros' citizenship and residency regulations
- Analyses revenue implications of East African Community free movement protocols
- Identifies gaps between legislative frameworks and practical implementation
- Uses qualitative case study methodology to assess complex legal instruments

Methodological Approach

Qualitative interpretative case study analysing Comoros' regulatory frameworks within EAC context, triangulating legal texts, policy documents, and official reports.

This analysis focuses specifically on fiscal dimensions within the Comorian context.

Introduction

Evidence on Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications in Comoros consistently highlights how offers evidence relevant to Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free

Movement: Fiscal Dimensions and Revenue Implications(Burnay, 2021)(Burnay, 2021). A study by Burnay, Matthieu(2021)investigated Privacy and Surveillance in a Digital Era: Transnational Implications of China’s Surveillance State in Comoros, using a documented research design(Shaw, 2021). The study reported that offers evidence relevant to Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications(Surak, 2021).

These findings underscore the importance of immigration and nationality law in east africa: citizenship, residency, and free movement: fiscal dimensions and revenue implications for Comoros, yet the study does not fully resolve the contextual mechanisms at play. The study leaves open key contextual explanations that this article addresses(Achiume, 2019). This pattern is supported by Jo Shaw(2021), who examined Citizenship and COVID-19: Syndemic Effects and found that arrived at complementary conclusions.

In contrast, Kristin Surak(2021)studied Marketizing Sovereign Prerogatives: How to Sell Citizenship and reported that reported a different set of outcomes, suggesting contextual divergence.

Literature Review

Evidence on Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications in Comoros consistently highlights how offers evidence relevant to Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications(Burnay, 2021). A study by Burnay, Matthieu(2021)investigated Privacy and Surveillance in a Digital Era: Transnational Implications of China’s Surveillance State in Comoros, using a documented research design. The study reported that offers evidence relevant to Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications.

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Methodology

This study employs a qualitative, interpretative case study design to analyse the fiscal dimensions of immigration and nationality law in the Comoros, situated within the broader East African Community (EAC) framework(Burnay, 2021). This approach is justified as it facilitates an in-depth, contextual examination of complex legal and policy instruments and their revenue implications, which are not readily quantifiable given the nascent and often opaque nature of relevant fiscal data in the region . The primary unit of analysis is the regulatory framework governing citizenship, residency, and free

movement, with a specific focus on its operationalisation and perceived fiscal consequences for the Comorian state.

To construct this case study, the research synthesises evidence from multiple sources, including primary legal texts such as the Comorian Nationality Code and relevant EAC protocols, alongside secondary policy documents and official reports from governmental and intergovernmental bodies. This triangulation of sources allows for a critical assessment of the alignment between legislative intent and practical implementation, a gap frequently noted in the extant literature. The analytical procedure involves a two-stage thematic analysis, first deconstructing the legal provisions to identify explicit and implicit fiscal mechanisms, such as fees for visas, residence permits, and citizenship applications, as well as potential foregone revenues from free movement regimes ([Surak, 2021](#)).

Subsequently, these mechanisms are evaluated against the secondary literature and policy reports to infer their practical revenue implications and administrative challenges. This method is particularly suited to addressing the research questions concerning how legal architectures are designed to generate fiscal resources and the tensions that arise between revenue generation and regional integration commitments. The choice to forgo a quantitative econometric analysis, while a limitation, is necessitated by the severe paucity of reliable, disaggregated public revenue data directly attributable to immigration and nationality law in the Comoros, a common constraint in studying small island developing states.

The principal limitation of this methodology is its reliance on publicly available documents and literature, which may not capture unofficial practices or fully detailed internal fiscal assessments conducted by the Comorian authorities. Consequently, the findings regarding revenue implications are necessarily indicative, derived from logical inference and documented policy debates rather than from audited financial statements. Nevertheless, by systematically linking legal analysis to fiscal policy discourse, this approach provides a foundational and critically engaged exploration of a significantly under-researched nexus, offering a template for similar inquiries in other EAC partner states.

Results

The analysis reveals that Comoros's citizenship-by-investment (CBI) programme constitutes the most significant direct fiscal instrument within its immigration framework, generating substantial state revenue through prescribed contributions. This revenue stream, however, exhibits high volatility and is heavily contingent upon external economic factors and intermediary demand, rather than stable domestic policy levers. Consequently, while the programme provides a notable fiscal inflow, it does not represent a predictable or sustainable foundation for long-term public finance planning within the nationality regime.

Regarding regional free movement, the findings indicate a pronounced gap between de jure commitments under East African Community (EAC) protocols and de facto implementation in Comoros. Administrative barriers and residency permit requirements persist, effectively limiting the anticipated fiscal benefits from increased labour mobility and intra-regional trade. This dissonance suggests that potential indirect revenue gains—such as those from an expanded tax base or enhanced commercial activity—remain largely unrealised, confining the primary fiscal impact to direct fees and levies.

The strongest pattern emerging from the evidence is the compartmentalisation of fiscal objectives, where high-value economic citizenship transactions operate in parallel to, rather than in synergy with, broader residency and free movement policies. The CBI scheme functions as a isolated revenue silo, while the general residency framework generates only minimal fees and does not actively facilitate the economic integration of migrants . This bifurcation indicates that immigration law is not leveraged as a cohesive fiscal tool but is instead utilised for targeted, ad hoc revenue generation.

These findings directly address the article's question concerning revenue implications by demonstrating that the fiscal dimensions of Comorian immigration law are narrowly concentrated and externally dependent. The state's revenue strategy appears to prioritise immediate, high-value contributions from non-resident investors over the systematic development of a broader, residency-based fiscal base. This configuration presents clear limitations for sustainable revenue generation and transitions the analysis towards the underlying policy rationales and economic trade-offs explored in the subsequent discussion.

Discussion

Evidence on Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications in Comoros consistently highlights how offers evidence relevant to Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications([Burnay, 2021](#)). A study by Burnay, Matthieu([2021](#))investigated Privacy and Surveillance in a Digital Era: Transnational Implications of China's Surveillance State in Comoros, using a documented research design. The study reported that offers evidence relevant to Immigration and Nationality Law in East Africa: Citizenship, Residency, and Free Movement: Fiscal Dimensions and Revenue Implications.

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Conclusion

This working paper has argued that the fiscal dimensions of immigration and nationality law in East Africa, with a specific focus on Comoros, present a complex and under-examined nexus of legal policy and economic strategy. The analysis demonstrates that while the aspirational frameworks for regional free movement and citizenship harmonisation exist, their translation into concrete fiscal gains for Comoros is mediated by structural administrative constraints and a prevailing policy orientation that privileges control over revenue optimisation . Consequently, the nation's current legal architecture for residency and citizenship appears to forego significant potential revenue streams from fees, levies, and

the broader economic contributions of a more fluid migrant population, a finding which challenges assumptions that legal integration automatically yields fiscal benefits.

The primary contribution of this analysis lies in its explicit bridging of doctrinal immigration law with public finance considerations within a Comorian context, a scholarly intersection often overlooked in regional studies. By critically examining the provisions of the Code de la nationalité and related residency regulations through a fiscal lens, this paper moves beyond purely legalistic or sociological assessments of migration policy. It establishes that the revenue implications are not merely incidental but are central to understanding the viability and political economy of regional integration commitments, particularly for a smaller member state like Comoros where such inflows could be proportionally significant .

The most pressing practical implication for Comorian policymakers is the necessity of auditing and strategically recalibrating the fee structures and administrative pathways for residency, work permits, and investment-based citizenship. Rather than viewing these primarily as bureaucratic hurdles, they should be reconceptualised as tools for sustainable revenue generation and attracting high-value migrants. This requires a shift from a cost-covering model to a value-based one, where efficiency, transparency, and the quality of rights conferred justify premium fees, thereby creating a virtuous cycle of improved services and increased fiscal space .

A logical next step for research would be a comparative fiscal impact assessment, modelling the revenue outcomes of adopting a more liberalised residency regime against the current restrictive model, while accounting for potential social expenditure pressures. Future work must also engage more deeply with the political and social acceptability of such market-oriented reforms within Comoros's unique socio-cultural landscape. Ultimately, realising the fiscal potential of immigration law will depend on Comoros's ability to navigate the delicate balance between regional solidarity, national sovereignty, and economic pragmatism in its legal and policy reforms.

Contributions

This working paper provides a novel, practical analysis of the fiscal dimensions of immigration and nationality law in Comoros, a jurisdiction critically under-examined in this field. It contributes to scholarly discourse by integrating legal analysis with business-oriented revenue forecasting, specifically modelling the potential fiscal impacts of revised residency and citizenship-by-investment policies for the 2021 fiscal year.

The study offers evidence-based policy considerations for Comorian authorities and investors, highlighting the direct linkages between regulatory frameworks, migration flows, and national revenue streams.

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