

THE OPTICIAN'S DILEMMA: CAN ALL THESE LENSES BE POLISHED INTO THE SAME FRAME OR DO WE NEED NEW FRAMES, TOO? – BREXIT: TIME TO REFORM EU CITIZENSHIP?

Lilla Nóra KISS*

ABSTRACT: *The United Kingdom's withdrawal from the EU provides an opportunity for conceptual and substantive reform of EU citizenship. The study purposes of summarizing the changes in the special sui generis status of EU citizenship, which are necessarily affected by the withdrawal. The situation is a paradox, as EU citizenship is arising from a supranational concept, but based on the member states' national laws regulation who is a citizen. Thus, the Treaties ensure acquired rights for the citizens of the member states, but the member states can decide to whom these rights are guaranteed. But the Treaties are silent about a situation as the Brexit is. The issue is particularly complicated, since the opportunity of losing acquired rights may also affect rights and interests related to human rights, too. The question is in my view; whether all the lenses could be fitted into the same old frame, or do we need modern, better-designed frames, too? In other words, has the time come to reform EU citizenship, or harmonize national citizenship rules on a minimum level? At the end of the study, I even formulate my de lege ferenda proposals for regulating citizenship issues.*

KEYWORDS: *Brexit; union citizenship; acquired rights; human rights*
JEL CODE: *K00, K19*

*PhD candidate and a junior research fellow at the Department of European Law and Private International Law, Faculty of Law, University of Miskolc, HUNGARY.

The described article was carried out as part of the EFOP-3.6.1-16-2016-00011 “Younger and Renewing University – Innovative Knowledge City – institutional development of the University of Miskolc aiming at intelligent specialisation” project implemented in the framework of the Szechenyi 2020 program. The realization of this project is supported by the European Union, co-financed by the European Social Fund