



DUAL CITIZENSHIP AS A TOOL FOR DIVERSITY
MANAGEMENT IN THE ERA OF
TRANSNATIONALISM

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Introduction

Dual citizenship is defined as holding citizenship in two nation-states by an individual. While each state defines its citizens in its national law, the tolerance of dual citizenship implies recognition of multiple affiliations of individuals (Faist & Gerdes, 2008). A shift in state justifications for application of dual citizenship regulations can be observed over time, changing from centrality of the nation-state in the 1950s to multiculturalism and notions of transnationalism at the turn of the century. What is understood by transnationalism in this context is movements and attachments “located outside the borders of the nation-state” (Vertovec, 2001: 10). It is a widespread view of mobile individuals creating transnational communities that allow them to maintain multiple identities, loyalties and communication networks across social, political and economic issue areas (Vertovec, 2001; Faist, 2010; Bruenau, 2010). It is the political character of transnational communities that poses challenges to state citizenship policies.

Thus, dual citizenship is seen as a response to increasing transnational movements and claims for political, social and economic rights in the era of transnationalism. Hence, it is a mechanism employed by states to manage diversity among its residents within the country and among its citizenry across state borders. To what extent can these different loci of diversity management be compatible and non-exclusionary in countries that face both immigration and emigration? Is dual citizenship suitable for diversity management in such countries? This paper seeks to address this question through comparison of state policies in three countries – Latvia, Netherlands and Turkey, employing methods of process tracing and analysis of legal framework governing the institution of dual citizenship.

The cases are interesting in the context of interplay between transnationalism and citizenship for several reasons. First, in all three cases dual citizenship is not freely available for all. It is instead available upon certain conditions, and tends to privilege some groups over others. This differential treatment gives an insight into how dual citizenship interacts with states’ diversity management strategies. Second, all cases provide an opportunity to analyze the interplay between immigrant and minority communities and emigrant communities in the dual citizenship debate. Large scale emigration leads to a necessity to maintain ties with citizens across borders, while the presence of minorities in its territory creates claims for their political integration. The character of migration dynamics in each of the cases is quite different, also resulting in differences in the composition of emigrant and minority communities. Third, all three countries are embedded in the European migration space. European citizenship aims to embody transnationalism or links surpassing state borders. Netherlands as a founding member state, Latvia as one of the 2004-enlargement countries and Turkey as a candidate country and a European Neighborhood Policy country may show divergent levels of the extent of internalization of the transnational citizenship concept via the institution of dual citizenship. Thus, this is a most different systems design, the common denominator being differentiated dual citizenship regimes and being both an immigration and an emigration country.

The paper is structured in two parts. First, a theoretical discussion on the concept of dual citizenship and its links with concepts of migration, loyalty, transnationalism and sovereignty provides an insight into how states could utilize the institution of dual citizenship in times of increasing transnational movements. The second part looks at developments of citizenship regime in Latvia, the Netherlands and Turkey. This paper does not aim at evaluating arguments for or against dual citizenship, but rather at seeing how the concept of dual citizenship overlaps with the discourse of diversity management when employed by the state. Using deductive reasoning, it shows the dynamics of state choices and justifications regarding dual citizenship through case study of three countries by process tracing of official legal documents.

The Changing Landscape of the Concept of Dual Citizenship

Already in 1930 with the signing of the “Convention on Certain Questions Relating to the Conflict of Nationality Laws” it was recognized that a uniform pattern on regulation of citizenship across states is difficult to achieve. This convention, thus, provided a framework for recognition of citizenship laws in other states. Article I of the Convention states that “It is for each State to determine under its own law who are its nationals. This law shall be recognized by other States in so far as it is consistent with international conventions, international custom, and the principles of law generally recognized with regard to nationality”. The Convention further stipulated that persons holding more than one nationality will be regarded as nationals in all the States whose citizenship they hold. At the same time, it was stated by this Convention, as well as the 1963 Convention on the Reduction of Cases of Multiple Nationality and Military Obligations in Cases of Multiple Nationality that dual citizenship is not a preferable policy course by states, predominantly due to security concerns. Accordingly, there is historical evidence of states requiring the denunciation of previous citizenship upon naturalization, restricting denunciation, as well as of intensive internal debates about recognition of dual citizenship. However, since the end of 20th century a growing acceptance of dual citizenship can be observed, with an increasing number of countries amending their citizenship laws in favor of dual citizenship or not ratifying the 1963 Convention and thus implicitly allowing holding of dual citizenship (Hammar, 1985; Bauböck, et al 2006; Fitzgerald, 2008; Brøndsted Sejersen, 2008).

Reluctance for dual nationality had been a characteristic of citizenship policies of liberal democratic states, inter alia, to prevent too much political participation both by minority populations and diasporas. However, a liberalization of plural citizenship regulations can be identified, dominated by ethnic conceptions and attempts to use citizenship policy to compensate for historical wrongdoings by conferring or denying citizenship (Liebich, 2009, Aleinikoff & Klusmeyer, 2002, Vertovec, 2005; Joppke, 1999; Fitzgerald, 2008; Brøndsted Sejersen, 2008). In Europe, one can trace a wide spectrum of state positions regarding plural citizenship with varying degrees of acceptance, as well as varying motivations. In Western Europe dual citizenship has become more acceptable due to the need to incorporate immigrants and promote their political integration, while in Eastern Europe it is aimed at creating stronger ties with emigrants, prioritizing nationalist and ethnic policies over minority rights (Iordachi, 2006; Liebich, 2009;

Miller, 1989; Fitzgerald, 2008; Brøndsted Sejersen, 2008; Ragazzi, 2009; Pap, 2006), quite contrary to Kymlicka's (1996) multicultural citizenship idea.

Considering the different empirical patterns of implementing dual citizenship policies, it seems useful to address the particular theoretical properties the concept possesses that allows governments to use it as a tool of both inclusion and exclusion, and how the respective application reflects the self-positioning of the state in an increasingly transnationalized world.

There are several catalysts that can serve to induce the debate on dual-citizenship in a state. One of the most often mentioned ones is migration. New members of the society may exert pressure on the host government to gain political rights or it can be viewed as a strategy of immigrant political integration by the receiving state (Hammar, 1985; Aleinikoff & Klusmeyer, 2002; Faist et al, 2004; Faist & Gerdes, 2008; Bloemraad, 2004). The same groups, on the other hand, must negotiate acceptance of multiple citizenship also with their countries of origin; thus, immigration and emigration serve as equal weights in inducing the debate on dual citizenship (Brøndsted Sejersen, 2008). Positions of sending countries and benefits of dual citizenship for maintaining ties with émigrés have not been explored in the literature as extensively as few authors focus on perceptions in sending societies (Conway et al, 2008; Fitzgerald, 2008). This highlights two important motivations for a state to consider allowing dual citizenship – ensuring stability at home and maintaining ties with citizens abroad.

Migration fosters growing demands for recognizing dual citizenship, but, as it is entwined with important political, social and civil rights (Dahlin & Hironaka, 2008), the debate on dual citizenship is often linked with discussions about the changing character of the nation state. Indeed, governments may have different reasons and strategies for addressing and/or categorizing their populations at home and abroad, but a central characteristic is seeing the nation-state as “the optimal condition of political-existence” (Ragazzi, 2009). This thread of reasoning is interwoven also in states' citizenship policies, and further exemplifies the dilemmas governments face when matching different policy aspects locally, nationally and internationally. It is the mere existence of a state that serves as a driving force for a debate within the state. While absolutist understanding of nation-state becomes problematic with introduction of dual citizenship (Brøndsted Sejersen, 2008; Fitzgerald, 2008), national identity still may serve as a tool of exclusion. When state is viewed as a membership organization, citizenship becomes a powerful instrument of social closure, according to Brubaker (1992a).

Hammar (1985) states that dual citizenship should not be equated with national identity or dual loyalty, it is merely a legal status; he points to the possibility of combining identities and loyalties. Both lines of policy, nevertheless, are closely interrelated, exemplified by dual citizenship policies being interpreted as tools for integration. Thus, official discourse may blur this distinction when arguing against or justifying the need for amendments of citizenship regulations. Sentiments of nationality, however, are an intrinsic part of this debate, as national society or polity shapes identities of its citizens, fostering feelings of

attachment and loyalty (*ibid*). The official interpretation of nationality in a country will, thus, direct the debate on dual citizenship.

Loyalty and attachment to the state, therefore, are two concepts crucial for the discussion of dual citizenship. Betts (2002), drawing on the Australian experience, argues that the fact that dual citizenship is being legalized, shows the political dominance of proceduralism and civic values over the idea that citizens must not only follow the procedural rules of the state, but also harbor a sense of belonging to the nation.

Dual citizenship in the proceduralism sense is linked with civic participation and “self-determination of political communities and individuals” (Blatter, 2008: 14). The argument of dominance of proceduralism implies that loyalty to several nations is not possible, if institutionalizing dual citizenship would lead to a lower importance of belonging. At the same time, doubts remain whether an individual is capable of fulfilling civic duties in multiple nations or will seek to escape them; this discourse dominated the debate on military service in case of multiple nationalities (*ibid*). Increasingly, however, doubts regarding loyalty of dual citizens are countered by the argument that it is better to include them as citizens rather than foster a growing number of noncitizens (Faist & Gerdes, 2008). While maintaining national sentiments across borders becomes more complicated for emigration countries, dual citizenship allows maintaining claims on economic and political resources of emigrants (Fitzgerald, 2008). Thus, in the context of thinning of loyalty, where the attachments shift from the nation state to the region or to a community (Falk, 2000), dual citizenship serves as a tool of adaptation. Dual citizenship from such a perspective can serve as a tool for diversity management, as immigrants are awarded similar rights and must commit to similar duties as members of the host society. It must be assessed, though, to what extent do policies of naturalization and integration presume assimilation, and, on the other hand, to what extent are newcomers able to pursue cultural citizenship in their desired shape.

Dahlin and Hironaka (2008) show how the character of state’s perception of loyalty will influence its policies regarding dual citizenship. They follow the idea of ‘imagined communities’, coined by Anderson (1991), offering a conceptualization of citizenship as community identity along three dimensions – national, ex-colonial and post-national, that emphasize state’s views on national identity, its historical legacies and international outlook, respectively, in determining the character of its citizenship regime (Dahlin & Hironaka, 2008). Following this distinction, however, recognition of dual citizenship can include certain conditionality that may be influenced by all three dimensions. A newly independent state wishing to strengthen its national identity, balancing historical legacies and increasingly establishing itself on the international arena will encounter pressures for diverse models of citizenship. Moreover, a paradox is created when states that allow holding dual citizenship either only with a selected number of countries or to selected groups of citizens as they see it possible for some of their citizens to fulfill their civic duties and remain loyal while developing attachments (communitarianism) to some countries. Analyzing the official discourse of a state allows identifying multiple influences and motivations for introducing a

citizenship regime of the respective shape. It embodies a state's envisioned diversity management regime, highlighting preferential integration dynamics.

The perspective of the state, read through the legal framework of citizenship regimes, can be analyzed through the perspective of state sovereignty. When an individual belongs to the population of several states, and resides outside the confined territory of one of her guarantors of citizenship, the location of state sovereignty becomes unclear (Faist et al, 2004). On the other hand, limiting an individual's options to hold multiple citizenships and requiring renouncing her citizenship upon becoming a national of another state leads to a diminishing population. When a state faces voluminous migration dynamics, it seeks tools to define its citizenry, and introducing dual citizenship may serve the purpose of maintaining ties with émigrés, as well as including immigrants in the political community (Hammar, 1985). Thus, from one perspective, dual citizenship can be seen as a strategy towards transnational citizenship and cosmopolitanism; and from another angle it can be seen as a strategy of preserving the centrality of nation state through citizenship linkages, despite the complexity of governing such an institution. By keeping citizenship as the basis of relations with both immigrant and emigrant communities, nation states reassert the centrality of such national-based belonging in governing these relations. The diversity management strategy of a country also aims to define the preferable society structure and the relations between residents of a country and the state. This is the main point of intersection between dual citizenship and diversity management.

Blatter (2008) draws attention to using dual citizenship as a tool for enhancing national solidarity in emigration countries. It is used not only to foster cultural bonds, but also to foster socio-economic transactions, thus instrumentalizing the institution of citizenship for economic growth and development. At the same time, when dual citizenship is introduced for strengthening links with the emigrant or diasporic communities, a state where several culturally different groups as migrants or national minorities reside in faces pressures for recognizing multiculturalism as a property of citizenship in order to foster their political integration (Kymlicka, 1996).

This leads to two complications. First, dual citizenship is awarded to groups with different modes of mobility, as emigrants and expats can still be highly mobile, while immigrants as long-term residents of a respective country issue claims for citizenship. Second, the relationship with the country of origin of these groups will play a crucial role in determining whether dual citizenship can be awarded upon naturalization or, in other words, not requiring the denunciation of previous citizenship. It is associated with possible threats to territorial integrity of the current country of residence, as citizenship of the country of origin entitles them to a certain level of protection, as well as serves as a channel of representation of national interest of the kin state. Being the kin-state itself, such a decision towards emigrants attaches lesser meaning to threats and more to possible political benefits of interest representation and lobbying. Dual-citizenship, in this view, is not conducive to claims of transnationalism (Blatter, 2008). Such a discourse

indicates the importance of not only distinction between immigrants and emigrants in citizenship debates, but also uncovers the significant role inter-state relations play in defining either state's citizenship regime.

Furthermore, while the transnationalism discourse is increasingly on the rise and several authors have argued for a citizenship of a transnational character (Faist et al, 2004; Conway et al, 2008), no model of transnational citizenship has been elaborated. It is posed that multiple citizenship is a step towards transnationalization of this institution; however, no mechanisms for preventing inequalities that stem from different origins of individuals are envisioned. While dual citizenship is seen as empowering citizens of peripheral states in representing the interests of their origin and thus leading to recognition of dual citizenship also in their country of origin (Vertovec, 2001; Blatter, 2008), it is not discussed how the empowerment of citizens of more powerful states residing in countries already dependent on them influences the support or reluctance towards dual citizenship. If one assumes that emigration takes place from countries that are economically in a less advantageous position, and these countries pursue dual citizenship policies to retain a link with their citizens abroad, a presence of a minority in such a country will play a significant role in the debates on the shape of citizenship regulations. Moreover, this addresses the effects of balance of power between states, and is rather a discussion of international, rather than transnational element of citizenship.

There are significant differences among states regarding *de facto* and *de jure* tolerance of dual citizenship, according to Faist et al (2004). It can be explained, positioning the debate on dual citizenship along two dimensions. While transnational or postnational perspectives emphasize citizenship as a human right, national perspectives of political integration will lead to divergent levels of toleration of dual citizenship. Moreover, interpretation of citizenship as a human right does not necessarily have to lead to dual or multiple citizenship, but rather to prevention of statelessness where citizenship of a single country already secures protection of individuals. Thus, not permitting dual citizenship does not imply that states do not pursue a diversity management system that does not go in hand with transnationalism, but the dual citizenship regime can be formulated in a way to promote such model of a society where transnationalism dictates the level of diversity tolerated.

Transnationalism can be interpreted both as an opportunity for migrant sending and receiving countries and migrant groups themselves, as well as seen as a threat to the nation-state (Labelle & Midy, 1999). State sovereignty, thus, plays a central role in debates of dual citizenship. Even though postnational conceptualization of dual citizenship leads to devaluation of national citizenship (Faist et al, 2004), or dilution of state-based identity (Spiro, 2007; Falk, 2000), states may choose institutionalizing dual citizenship in a way to reassert the centrality of nation states in decision-making on citizenship regulations. It interplays with the earlier distinction of national, ex-colonial and post-national perceptions of loyalty. As these labels suggest, positioning of states in historical context and current international system is significant. While these labels do not prevent methodological nationalism, the fact that dual citizenship regulations are determined nationally, justifies such an approach.

The next section assesses citizenship regimes in three countries that allow differentiated access to dual citizenship. Dual citizenship in this context is viewed as exemplary of one of diversity management dimensions, along with immigration policies, anti-discrimination measures, and educational policies. Naturalization requirements and measures of civic and political integration are viewed in line with dual citizenship policies, as all are prime indicators of the chosen citizenship regime.

Case Analysis

Latvia

Latvia declared its independence from the Soviet Union in 1991 and considered itself to be a continuation of the country that existed during the interwar period until the forcible annexation by the USSR. The citizenry of Latvia accordingly was renewed following the 1919 law “On Nationality”, following the principle of *ex injuria jus non oritur*, and about 700’000 former immigrants and their descendants remained as stateless persons. For humanitarian reasons, the government of Latvia adopted a temporary status – the status of a non-citizen of the Republic of Latvia. Citizenship policy was restored in a way to benefit the ‘most favored nationality’ (Brubaker, 1992b), and was not implemented in a way to accommodate the suddenly marginalized group of Russian-speaking minority, despite efforts of international organizations as OSCE High Commissioner on National Minorities, EU and Council of Europe to convince the government to liberalize this policy, and culminated with the final introduction of a permanent non-citizen status due to human rights considerations in 1995. The importance of international pressures was recognized in the debates leading to the acceptance of 1994 Citizenship Law and of the law on status of foreign nationals (Ivļevs & King, 2010, Reine, 2007; Krūma, 2013).

Commercio (2004: 24) paints the picture of Latvia’s society as a result of the citizenship policy adopted in mid-1990s: “Latvia’s exclusivist citizenship policy has produced a society consisting of citizens of Latvia (overwhelmingly ethnic Latvians), non-citizens or aliens (overwhelmingly ethnic Russians), and citizens of Russia (Russians who are permanent residents of Latvia but take Russian citizenship)”. It is notable that not granting automatic citizenship to all residents of the restored Republic of Latvia was justified by the necessity to preserve a sizeable majority of Latvians in the whole of citizenry. Brubaker (1992b) highlights the fear of denationalization as a core element of citizenship struggles in the Baltics, including Latvia. Moreover, there were views that automatic granting of citizenship to non-Latvians would not lead to integration but rather to silencing their identity and assimilation. Loyalty was central in the debates of the 1993-1994 debates on Citizenship Law, neglecting the post-national dimension of loyalty as suggestions regarding minority protection by international bodies were not fully incorporated. That led to the introduction of very strict naturalization quotas causing international condemnation and refusal of the President of Latvia refusing to sign the first version of the Law passed in the Parliament on 22 July 1994. Provisions of naturalization were then amended, but due to negative perceptions of Soviet immigrants, naturalization rates were very low as many chose to take on Russian or other citizenship or apply for the

status of non-citizen (Krūma, 2013). International community insisted that facilitation of naturalization is necessary in order to, inter alia, secure internal stability and prevent external threats (ibid).

After the restoration of independence dual citizenship was primarily seen as a tool to reconnect with the émigrés, but the time-span allotted for application for dual citizenship was limited until 1 July 1995. 1994 Citizenship Law in combination with the principle of state continuation, thus, provided opportunities for dual citizenship, without unambiguously recognizing it. Dual citizenship was implicitly tolerated among the diaspora of Latvia, not among the permanent residents of the country (Krūma, 2013). In the debates regarding the formulation of the (restored) citizenship law, the sensitivity of dual citizenship was explicitly recognized. Loyalty played a central role in the debates on dual citizenship in early 1990s, and was seen as possible to be shared for those residing in the Western hemisphere, but was not perceived as desirable when fulfilling representative functions in the government. Thus, right after restoration of independence, Latvia's dual citizenship regime could be characterized as restrictive. This is largely explained by the presence of threat from the Eastern neighbor, Russia, which is also the kin-state of majority of non-citizens. International pressure was taken into account to a minimal extent in order not to completely diminish Latvia's chances of successful integration in the international society of the West. The citizenship regime in 1990s was illustrative of the stance towards diversity in the society –the titular nation was favored in citizenship policies, and homogeneity of society was seen as desirable.

While 1994 Citizenship Law has been amended three times after its initial entry into force in 1995, 1997, 1998, the legal framework for dual citizenship remained unchanged until late 2013, the latest amendment of the Law. Today, a high number of non-citizens remain due to unwillingness to naturalize as a result of internal struggles (language acquisition) and external benefits (visa-free travel to Russia) (Krūma, 2013).

Recently, the issue of dual citizenship resurfaced as a result of extensive emigration from the country in times of economic downturn in conjunction with a shift in Latvia's diaspora policy and introduction of a policy of return migration. It is assessed that about 12% of Latvia's two-million population resides abroad, and it is expected that the country will experience labor force shortages in the coming ten years. Economic factors are seen as one of the main driving forces behind the development of Latvia's diaspora policy, and return migration is perceived as the preferable solution. The preference for the return of Latvia's own kin is explicitly stated by government officials (Lāce, 2013). This has certain implications for the citizenship regime of Latvia; preference for homogeneity of the society remains and is closely linked with aspects of loyalty.

Changes in the Citizenship Law, thus, were in line with other policy developments in order to accommodate to changing flows of economic emigration, as well as historical emigration, making it easier to acquire citizenship for children of emigrated citizens, in addition to Latvian citizens who emigrated during World War II and their descendants, basically meaning a second round of applications for émigrés and their descendants. Major contentions during debates were caused by the selection of countries dual

citizenship was permitted with, showcasing the dynamics between national, international and transnational levels of citizenship. Political objectives and interests of the State of Latvia are linked with retaining the citizenry of Latvia across borders through the institution of dual citizenship. The emphasis on national interests can directly be tied with nationalist understandings of citizenship identified earlier.

Following these aims, significant amendments regarding dual citizenship were introduced in October 2013. The main changes included lifting the time limitation for application to dual citizenship, and the stipulation that Latvian citizenship was compatible with citizenship of a certain category of countries, namely, Member States of the EU, EFTA, NATO, and Australia, Brazil, New Zealand, as well as countries Latvia has bilateral agreements regarding mutual recognition of dual citizenship with. Significantly, Latvian citizenship is not revoked also if a person is serving in the military of these countries. If a person wishes to maintain Latvian citizenship alongside a citizenship of a country not included in this list, she may apply for an authorization by the Cabinet of Ministers that assesses the compliance of such conditions with State interests. Moreover, this limited selection of countries does not apply to Latvians in exile (Sections 9, 24, Citizenship Law). The exclusion of Russia, the kin-state of a large share of non-citizens and permanent residents of Latvia, is deliberate, and follows similar justifications as during the period of formulating the initial version of Citizenship Law in early 1990s. Thus, following the 2013 amendments, Latvia acquired a differentiated dual citizenship regime, explicitly mentioning political motivations and relations with kin-state of minorities. Security and compatibility of interests serve as motivators for the selection of states, along the presence of Latvian communities in these countries.

Thus, national interests including, inter alia, security and common values, serve as the fundamental justification for dual citizenship regulations, instead of viewing it as a mechanism of diversity management within the country. Post-national and transnational perspectives, or course, cannot be excluded from this discussion as Latvia's membership in some international organizations also has directly influenced state selection and as the transnational character of target audiences is explicitly recognized. However, as selected countries seem to guarantee a greater certainty of security, as well as the discourse towards non-citizens has remained unchanged, national sentiments seem to prevail over those of transnationalism. Therefore, the case of Latvia has not presented an example where the institution of dual citizenship aims to shape society with the spirit of transnationalism in mind.

The Netherlands

The Netherlands has been praised internationally as a prime example of implementing multiculturalism, a concept that can be considered to be at the core of its diversity management system. The cultural pluralism brought by immigration is to be not only recognized, but also institutionalized. Later, especially throughout 2000s, the failure rather than the success of this model was discussed more often (Scholten, 2012). Does the dual citizenship regime of the Netherlands fit this conceptualization of multiculturalism in the Dutch context or is it instead a dimension of the chosen diversity management track that failed to embody the dynamics brought by multiculturalism and transnationalism?

The character of Dutch citizenship regulations stems from the immigration country status of the Netherlands. Following a rather stark change from emphasis on assimilation into Dutch culture and language in integration policies and citizenship law (van Oers et al, 2013), the amended citizenship regulation in late 1980s was used as a tool to facilitate integration and improve minorities' legal position along with the promotion of multiculturalism embedded in the slogan 'integration with the retention of identity' (Scholten, 2012: 100). At this point in time the Dutch government explicitly expressed its opposition to dual citizenship; nevertheless, the 1985 Citizenship Act provided several possibilities for the occurrence of multiple citizenship at birth or in cases when renunciation of former citizenship was not possible (van Oers et al, 2013). Thus, it rather depended on the regulations in the country of origin, taking into account these transnational ties possessed by immigrants. However, even then integration was interpreted in its economic and social, rather than political sense in order to promote return of migrants to their countries of origin. Diversity management was pursued in the short-term, and dual citizenship was not considered to be a tool for promoting integration.

Interestingly, in the 1980s not only the immigrants were seen as integrating in their host society. Also Dutch emigrants were seen as undergoing the same process, and thus losing ties with their homeland. Therefore, loss of Dutch citizenship after ten years spent abroad was seen as justifiable by law-makers of the Netherlands. Moreover, this was also seen as a tool to limit the occurrence of dual citizenship the government was so unsupportive of (van Oers et al, 2013).

Only at the beginning of 1990s political integration of individual immigrants surfaced in the integration discourse, however, this time without emphasizing ethnic minority communities as a whole, in a way counteracting the multiculturalism context (Scholten, 2012, van Oers et al, 2013). Such an 'active citizen' approach is very appropriate for the discourse of transnationalism, nevertheless, as each individual's responsibility for her place in the society allows pursuing transnational links alongside civic integration. Interestingly, debates in the government saw arguments of transnationalism as grounds for abolishing the renunciation requirement alongside claims that dual citizenship can promote political integration. In the end, 1991 Amendments abolished the renunciation requirement, however, only for immigrants. The Dutch still lost their citizenship after a ten-year residence abroad (van Oers et al, 2013). Thus, dual citizenship was seen as acceptable diversity management tool in the Netherlands, but not across its borders towards own citizens. There was a differentiation, then, between categories of individuals regarding their capability of preserving transnational attachments and loyalties.

The public did not express support to the governmental support provided for immigrant integration, viewing it as too generous. Also Dutch emigrants protested the automatic loss of citizenship. 1990s saw several debates on the legal framework of Dutch citizenship, footballing back and forth regarding the renunciation agreements in order to find a balance between access to dual citizenship for emigrants and immigrants. The renunciation requirement was reintroduced in 1997, leading to decrease of naturalization rates among some immigrant groups (van Oers et al, 2013).

Expansion of more critical views both by the society and by political actors made the previously pursued integration policy to be seen as a failure. As a result, along with more restrictive immigration policies, more restrictive measures for residence and naturalization were introduced in early 2000s. Both integration policies and citizenship policies have become more assimilationist and citizenship, instead of being seen as means for integration, has become the end of the integration process. Loyalty also has been increasingly emphasized. The fact that not just integration, but assimilation is, in fact, expected, is recognized explicitly in Article 8 of the Netherlands Nationality Act. As the public debate took also some violent turns, the cultural and social differences between the host society and immigrants were better showcased, therefore the aim was to close this gap, but with only unidirectional action – on behalf of immigrants (Scholten, 2012). The effect of making naturalization requirements harsher is that several groups as the illiterate or elderly are not able to perform according to the standards expected (van Oers et al, 2013). Such model of diversity management hardly seems to be linked with transnationalist notions of maintaining multiple cultural affiliations across national borders.

Dual citizenship can still occur in many cases, despite reintroduction of the renunciation requirement, as there are 15 situations that allow the applicant to become exempt from it (Böcker & van Oers, 2013). However, the access to Dutch citizenship as such has become more difficult, with stricter language and societal knowledge requirements. The retention of Dutch citizenship for emigrants, in turn, has become easier (van Oers et al, 2013). Thus, diversity management in the society saw a stronger emphasis on *Dutchification*, and transnational links for migrants can be maintained through the institution of citizenship as long as integration in the Dutch society has been successful. However, the regulation implicitly prevents full integration of some groups of migrants, therefore also preventing true transnationalism in such a diversity management system.

Recently the debates on dual citizenship have resurfaced and are centered on the distribution of benefits among emigrants and immigrants. Political parties are divided on the issue, some willing to retain equal access to dual citizenship for both groups, while some suggest a preferential treatment of the emigrants. In such a case the regulations of dual citizenship will have gone a full circle from favoring immigrants initially to emigrant communities instead. There have also been initiatives to keep dual citizenship option for just immigrants. The emigrant community has been actively protesting proposed amendments to reintroduce the previous regulation for loss of citizenship (van Oers et al, 2013). The local population, on the other hand, has expressed opposition to dual citizenship, with over 60% of adult Dutch population viewing dual citizenship as undesirable (Statistics Netherlands, 2011). Substantial changes in practice since the restrictive turn in early 2000s, however, have not been pursued.

The stance towards dual citizenship as a tool for diversity management has changed from completely restrictive in 1980s to differentiated today, and has seen privilege being awarded to both immigrant and emigrant communities at different points in time. The official position of the government towards dual

citizenship, however, is still negative, and the occurrence of dual citizenship is rather explained by humanitarian considerations included in the exemptions of renunciation agreement.

Turkey

Turkish citizenship was constructed during the early 20th century along the establishment of the Republic. The 1928 Citizenship Law aimed at extending Turkish citizenship to all residents, therefore discrimination on the basis of ethnicity or religion did not take place. Moreover, the way Turkish national identity was formulated denied existence of any diversity, besides religious, in the country, therefore all citizens were labeled as 'Turkish' (Kirişçi, 2000). Kaya (2012) points to a necessary distinction between diversity as a discourse, which in this context is denied, and as phenomenon, which is visible when assessing the different communities present in Turkey. The way state policies were pursued, indicated preference for Turkish ethnicity and language (Kirişçi, 2000). For example, employment regulations forced some groups to leave the newly established country without directly excluding them from acquiring citizenship. In addition, immigration policies regarding settlement and asylum favored Sunni Muslim populations. Such cultural conceptualization of citizenship was challenged by increasing international migration and formation of large Turkish emigrant communities abroad after large scale labor emigration to Western European countries starting in 1960s, the EU accession process, as well as by the rise of powerful religious, ethnic movements of Kurds, Alevis and others. (İçduygu et al, 2000; Kadirbeyoğlu, 2012).

Implementation of dual citizenship has been controversial as a result of the former challenges. Turkey considers dual citizenship as a tool of integration of migrants in receiving societies. The uprising of identity-based groups, in turn, has increased the awareness of citizenship as a tool for solving identity-based conflicts and has resulted in a shift away from Islam as main determining factor for citizenship by recognizing multicultural diversity, but it does not necessarily lead to acquiring the status of a dual citizen, as these ethnic communities do not have affiliation with any other countries (Kaya, 2012; İçduygu et al, 2000; Kadirbeyoğlu, 2012).

Overall, thus, Turkey has viewed dual citizenship as a tool to accommodate the needs and demands of emigrants, rather than means of diversity management within the country. Dual citizenship was first implemented in April 1981, which led to a large number of emigrants acquiring citizenship in their countries of residence while retaining their Turkish citizenship, if permitted by legislation of the host country. The main conditionality was to inform the Turkish counterpart about acquiring citizenship elsewhere (İçduygu et al, 2000; Kadirbeyoğlu, 2012).

Benefits associated with dual citizenship from the perspective of Turkish government deal with remittances and direct investment economically and lobbying potential, especially in the context of EU accession, politically. The importance of these benefits has also fostered search for other solutions, besides dual citizenship, to maintain ties with emigrant communities, in reaction to dual citizenship regulations in host societies. For example, some legal difficulties faced by Turkish emigrants in Germany

who used Turkish law to surpass German regulations regarding dual citizenship led to an introduction of a privileged non-citizen status in 1995 in order to protect the rights of emigrants in Turkey, depriving them only of voting rights in local and national elections, in cases when their host-country doesn't accept multiple citizenship. This specific tool, however, was not intended to include Kurdish or Alevi minorities who had renounced their Turkish citizenship upon leaving the country, and instead was to benefit Turkish emigrants, again highlighting the existence of diversity as a phenomenon. Emigrant organizations have played an active role in designing such specific conditions. Their positions depend on developments in their host countries, and Turkish diaspora organizations have continuously informed the Turkish state about the challenges they face in order to reach a solution that would ease their stay abroad (Kadirbeyoğlu, 2012; Öktem, 2014).

The most significant changes introduced with the 2009 Citizenship Law removed the condition that Turkish citizenship will be withdrawn if emigrants haven't informed Turkish authorities upon acquiring citizenship elsewhere, as well as if male emigrants have not completed their mandatory military service (Kadirbeyoğlu 2012). This development again highlights the wish of the Turkish state to maintain ties with emigrants due to above mentioned benefits despite action that can be interpreted as disrespectful towards the state. By creating favorable circumstances for Turkish emigrants to practice transnationalism through the institution of dual citizenship and privileged non-citizen status, Turkey leaves a slight impact on diversity management at home, rather directly affecting diversity management systems in countries where Turkish emigrants currently reside.

Regarding policies that directly affect diversity management within Turkey, mechanisms allowing easier access to naturalization to immigrants of Turkish origin or with close links to Turkish culture can be identified, despite the civic formulation of citizenship with the establishment of the Republic (Kirişçi, 2000). For example, in the case of Bulgarian Turks, the Turkish government encouraged this group to acquire dual citizenship when such an option was made available by Bulgaria and to pursue their political rights there as well. 2003 Amendments eased naturalization process for citizens of Northern Cyprus. Overall, those of Turkish origin were provided with less demanding requirements for the naturalization process as shorter period of residence. It was not the case towards immigrants of different categories, for example, the time period before citizenship transfer could take place was extended in length for spouses of Turkish citizens. It is argued that such an interpretation of the category of immigrants has prevented the politicization of this group in the citizenship debates (Kadirbeyoğlu, 2012). Dual citizenship, in general, is not a central issue in policies towards immigrants. Rather, policies that promote *Turkishness* of the society are pursued, and the diversity discourse is essentially non-existent. While there are signs of immigrant activism demanding 'equal treatment' on the same principles as those that have fueled the dual citizenship institution (ibid), EU accession process and crises in the region have caused a return of nationalism, that is not fruitful for introduction and development of diversity management discourse (Kaya, 2012).

While the influence of international organizations is not directly observable in the citizenship debate, it has been significant regarding immigration and asylum policies and questions of national minorities. Accession partnership agreements with the EU called for harmonization efforts regarding immigration and asylum, for example, in Turkey's visa and border regimes (İçduygu, 2007). Issues of national minority protection have served as points of contestation between the government of Turkey and OSCE HCNM. However, in neither of these aspects has dual citizenship been seen as a tool for change or for diversity management. Rather, as the above overview shows, dual citizenship is a tool mainly geared towards emigrant populations in order to promote their political rights and foster integration in host societies, in that way also increasing their capacity of political interest representation for their home government.

Conclusion

Dual citizenship can be seen as a response to increasing transnational movements and claims for political, social and economic rights in the era of transnationalism. It may be employed by states to manage diversity among its residents within the country and among its citizenry across state borders. To what extent can these different loci of diversity management be compatible and non-exclusionary in countries that face both immigration and emigration? Is dual citizenship suitable for diversity management in such countries? After an overview of state policies in three countries – Latvia, Netherlands and Turkey, several trends, commonalities and divergences can be identified.

First, in countries that have to manage their relations both with emigrant and minority communities, dual citizenship is more often seen as a tool for maintaining ties with those abroad, rather than as an institution that can be used to manage diversity internally. This is explained by the existing conceptualization of national identity, especially in the case of Turkey and Latvia, and by concerns of loyalty and the shape of integration policies and their expected outcomes. There is a paradoxical view that emigrants can possess the status of a dual citizen without challenging national unity, loyalty and security, while immigrants, people who arrive in the country as new comers, should preferably let go of their previous affiliations and internalize their new host culture and society instead. Thus, even though conceptually dual citizenship could be used to manage diversity both internally and across state borders, the actual practice of dual citizenship as a tool of diversity management is rather exclusionary and discriminatory, as states explicitly privilege one of the migrant communities.

Second, if a state does not pursue active diversity management policies and does not acknowledge the benefits of a diverse society by embedding such discourse in citizenship policies, dual citizenship is not even debated in the diversity management context. However, the previously mentioned distinction between diversity as a discourse and diversity as a phenomenon explains the tensions arising from such constellations. In the three cases analyzed above, presence of diverse communities in the country is an established fact, thus, diversity exists as a phenomenon. But in the case of Turkey and Latvia it is not recognized in the dual citizenship debates, and in the case of Netherlands it is rather linked with

multiculturalism than citizenship. Therefore this seemingly useful tool for diversity management, according to the theoretical debate above, is not introduced in the diversity management discourse.

Third, public support is central in determining the position of dual citizenship in diversity management strategies. Nationalist sentiments, anti-immigration stances and demands from emigrant communities contribute privileging maintaining ties with emigrants for access to dual citizenship. Naturalization, topped with willingness to renounce former citizenship, in turn, seems to foster a sense of a more thorough integration or assimilation process, causing less doubt as regards loyalty and security.

Dual citizenship has been quoted on numerous occasions as the type of citizenship in the era of transnationalism. However, as the above analysis shows, countries that face both emigration and immigration, fail to find a balance between communities created as a result of both migration dynamics, and find it harder to utilize dual citizenship as a tool for diversity management at home.

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