

**DUALITY IN CONTEXT:**  
Multi-Level Approach to Dual Citizenship in Turkey

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## ABSTRACT

The citizenship institution of today is marked by a steady trend towards states' broader acceptance of dual citizenship. This rapid spread of membership in more than one polity raises numerous questions concerning migrants' rights and obligations, participation and identity. Against geographical and contextual boundaries in the dual citizenship literature, this study explores the institution of dual citizenship through an alteration in the setting and framework. Employing the case of Turkey from the global south, this research assesses the impacts of dual citizenship on the traditional notion of citizenship through the utilization of Kymlicka and Norman's (2000) citizenship dimensions, which include formal status, activity and identity. For a comprehensive analysis, the triadic setting of the research incorporates all the relevant actors of international migration with Turkey as the host state, Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine and Uzbekistan as the major sending countries to Turkey, and finally, the international migrants in Turkey's immigration space. Based on the perceptions and practices of sending and host states and migrants, first, dual citizenship leads to only a partial paralysis of traditional citizenship and second, it is not perceived affect integration. These two contributions pave the way for a third and more significant contribution to the literature on dual citizenship. *Sesqui citizenship*, standing for "one and a half citizenship" to imply the "less than wholeness" of this status, highlights the asymmetrical, unbalanced weight of citizenship dimensions through the perspectives of migrants, sending states and host states. *Sesqui citizenship* not only reveals the actors' unsymmetrical relationship with various citizenship dimensions, but also describes the asymmetry between the three actors' positions concerning dual citizenship. To conclude, *sesqui citizenship* presents a further differentiation of the citizenship conception in a setting different from the typical dual citizenship research context.

**Keywords:** Dual citizenship in Turkey, migration, citizenship rights, citizenship obligations, citizenship activity, identity.

## ÖZET

Günümüzde vatandaşlık kurumu, gittikçe artan sayıda devletin çifte vatandaşlığı kabul etmesi yönünde istikrarlı bir eğilim göstermektedir. Çifte vatandaşlığın devletler tarafından hoşgörülmesi ile birlikte birden fazla vatandaşlığı olan kişilerin artması ise hak ve yükümlülükler, katılım ve kimlik ile ilgili bir çok soruyu beraberinde getirmektedir. Bu sorularla ilgili olarak, çifte vatandaşlık literatüründe coğrafi ve bağlamsal sınırlar oluşmuş, yoğunlukla Batı'nın geleneksel olarak göç kabul eden ülkelerine odaklanılmıştır. Bu çalışmada ise çifte vatandaşlık kurumu göç alan ülke kimliğini yeni taşımaya başlamış olan Türkiye üzerinden farklı bir çerçeve ve coğrafi bağlamda incelenmektedir. Çifte vatandaşlığın geleneksel vatandaşlık kavramı üzerindeki etkileri Kymlicka ve Norman'ın (2000) statü, etkinlik ve kimlik içeren vatandaşlık boyutları çerçevesinde değerlendirilmiştir. Kapsamlı bir analiz için araştırmada göçmen alan ülke, gönderen ülke ve göçmenleri içeren üçlü bir yapıya yer verilmiştir. Bu üçlü yapıda, göç alan ülke Türkiye olarak kabul edilirken gönderen ülkeler ise Türkiye'ye en fazla sayıda göçmen gönderen Azerbaycan, Bulgaristan, Gürcistan, Almanya, İran, Irak, Rusya, Suriye, Türkmenistan, Ukrayna ve Özbekistan olarak belirlenmiştir. Araştırma sonuçları, bu aktörlerin algıları ve uygulamaları temelinde bakıldığında, çifte vatandaşlığın geleneksel vatandaşlığı temelinden sarstığını ancak göçmenlerin çifte vatandaş olmalarının Türkiye'ye entegrasyonunu etkilemediğini göstermektedir. Ancak çifte vatandaşlık, hak ve ödevler, katılım ve kimlik bağlamında tam anlamıyla işleyen iki ayrı vatandaşlık olarak düşünülmemektedir. Çifte vatandaşlık kavramının varsaydığı iki simetrik vatandaşlık olgusunun aksine bu vatandaşlıkların işlevini sürdüren iki vatandaşlık olmadığı, göçmen kimliğine bağlı olarak iki vatandaşlığın da farklı boyutlarında eksikliklerle tecrübe edildiği anlaşılmaktadır. Çifte vatandaşlıkta göçmenlerin, göç veren ve göç kabul eden devletlerin perspektifleri aracılığıyla vatandaşlığın farklı boyutlarının işlevlerini yitirmesi ve asimetrik olması ile ilgili olarak bu çalışma bütünden az, bir buçuk vatandaşlık anlamında “*sesqui vatandaşlık*” nosyonunu ortaya koymuştur. Bu nosyon, aktörlerin çeşitli vatandaşlık boyutlarıyla simetrik olmayan ilişkilerini ortaya çıkarmakla kalmayıp çifte vatandaşlık üzerinden yeni bir farklılaşma sunmaktadır.

**Anahtar kelimeler:** Türkiye'de çifte vatandaşlık, göç, vatandaşlık hakları, vatandaşlık ödevleri, katılım, kimlik.

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# CHAPTER I

## Introduction

The citizenship institution of today is marked by a steady trend towards states' broader acceptance of dual citizenship. Once identified with negative connotations such as treason and espionage and labeled as a legal anomaly, the current rise in the number of dual citizens across the globe signals a change in the traditional notion of citizenship. This rapid spread of membership in more than one polity raises numerous questions concerning migrants' rights and obligations, participation and identity.

Scholarly studies on the institution of dual citizenship, however, are often limited by contextual and geographical boundaries. To illustrate, most studies in this line of research overlook the migration settings beyond Western Europe and North America. In like manner, citizenship studies often disregard sending states and migrants as actors of this institution. In addition to these restraints, scholarly work often approaches dual citizenship through a lens of duality. In this duality, on the one end of the spectrum, opinions emphasize fears from the adverse effects of dual citizenship on traditional citizenship and integration. On the other end of the spectrum are, per contra, the high expectations concerning the impacts of dual citizenship on migrants' integration in receiving countries. In this regard, contextual and geographical limitations coupled with bounded opinions which disguise the "in-between positions" on dual citizenship not only present a vague and partial understanding of a complex institution, but also confine our comprehension and projection of what exactly dual citizenship does to the traditional understanding of citizenship.

Against these limitations, this study aims to explore the institution of dual citizenship through an alteration in the setting and framework. Employing the case of Turkey from the global south, the impacts of dual citizenship on the traditional notion of citizenship are assessed through the utilization of Kymlicka and Norman's (2000) citizenship dimensions. In this direction, the dissection of dual citizenship based on the foundational structure of formal status, activity and identity provides a solid point of reflection to develop a clear and sophisticated understanding of this institution. For a comprehensive assessment of dual citizenship, citizenship dimensions are further distinguished into their components based on the existing literature. To illustrate, formal citizenship is categorized into rights and

duties of membership (Kymlicka and Norman 2000). Next, the activity dimension is classified with regards to migrants' political, economic and social participation (Oers 2013, 18). Finally, identity is distinguished in terms of nationality, ethnicity, religion and gender based on the research context.

Moreover, for a comprehensive analysis, the research employs a triadic setting that incorporates all the relevant actors of international migration with Turkey as the host state, Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine and Uzbekistan as the major sending countries to Turkey, and finally, the international migrants in Turkey's immigration space. In this vein, employing a case from the global south and maintaining a balanced approach to all the relevant actors of international migration, this research examines the impacts of dual citizenship on traditional citizenship through an assessment of citizenship dimensions in Kymlicka and Norman's terms (2000).

Hence, the point of departure in the research is the asymmetrical memberships involved in the status of dual citizenship. In this asymmetry, as international migrants are often rooted more firmly in one country where all the rights and duties of citizenship are operative, the rights and duties attached to the second country of citizenship are usually inactive (Harpaz 2000; Faist 2000). While this disproportionate weight in dual membership is acknowledged, no further differentiations have been explored in relation to how dual citizenship operates in various contexts. Following Işın and Turner's (2007) thinking that the conception of citizenship is broadening in a constant evolution, this research both broadens and deepens the analysis of asymmetrical memberships of dual citizenship by incorporating all actors of the institution and dissecting citizenship into its dimensions of status, participation and identity.

To assess how dual citizenship operates in the formal status, activity and identity dimensions and affects traditional citizenship, this study primarily explores the two lingering questions in the dual citizenship literature. The first focal point in this line of citizenship research concentrates on the impacts of dual citizenship on formal citizenship and asks whether dual citizenship paralyzes the formal status of citizenship due to overlapping membership in more than one polity. The second focal point in the literature concerns the impacts of dual citizenship in the citizenship dimensions of activity and identity and asks whether dual citizenship acts as a barrier against or as a catalyst of integration in the host states. In point of fact, these two questions around which most dual citizenship debates revolve, only partially reflect the complexities of the dual citizenship institution. While they

unveil the potential complications of dual membership in relation to formal citizenship and integration to a certain degree, these focal points in the dual citizenship literature reduce this institution to a monolithic and linear status that operates homogeneously across the globe and independent of context. Nevertheless, despite their insufficiency in expressing the multiplicity of dual citizenship, these two questions in the literature may still serve as instruments to analyze the modes in which dual citizenship operates with regards to citizenship dimensions.

In light of these debates, to explore how dual citizenship transforms the traditional institution of citizenship, this research puts a variety of issues under light both at the state and migrant level. At the state level, the official dual citizenship legislations and state practices are examined with a concentration on the three dimensions of citizenship for both sending and host states in Turkey's immigration space. At the individual level, which includes citizens and non-citizens, the research concentrates on migrants' approaches to the acquisition of Turkish citizenship and maintenance of original citizenship. At this level, migrant perceptions and practices with regards to the benefits and disadvantages of dual citizenship take the center stage together with their opinions and engagement in relation to the formal, activity and identity dimensions of citizenship. Finally, within the triadic setting of the research consisting of host and sending states and migrants, the interactions and conflicts between actors and convergences and divergences among their viewpoints are explored to reach an extensive understanding of the dual citizenship institution.

Here, the timing of the research is critical as this study was conducted when major events unfolded in the Turkish migration scene. Hence, a study that started in 2014 as a speculative inquiry into the relationship between migration and citizenship aiming to re-conceptualize dual citizenship in the Turkish context transformed into a very important practical matter with possible policy implications. At this point, it is necessary to introduce the events that changed the nature of the research through a timeline of the flow of Syrian nationals into Turkey.

With the first flow of Syrian nationals into Turkey in 2011, Turkish authorities followed an "open door" policy that involved no legal rights for migrants (İçduygu and Şimşek 2016). This was due to the assumption that their settlement in Turkey would only be short and temporary. The second period of the Syrian migration to Turkey started in 2015 when the movement of refugees from Turkey to Europe reached the highest level leading to an EU collaboration with Turkey to limit irregular migration (İçduygu and Şimşek 2016).

This collaboration brought Turkey a financial support to improve the situation of Syrian nationals. Finally, the third period refers to a process in which policies and practices in Turkey move in the direction of integration (İçduygu and Şimşek 2016). Here, the most important state response is a promise of citizenship to Syrian migrants. In July 2016, President Erdoğan announced that Syrian nationals settled in Turkey could eventually be granted Turkish citizenship<sup>1</sup>.

This state announcement concerning citizenship may be considered a crucial sign that confirms Turkey's acceptance of permanent migrants. Next, considering the Syrian population of more than three million, citizenship acquisition by Syrian nationals will suddenly make dual citizenship a significant legal status that would be of interest to a large community. Hence, the findings of this research on migrants' dual citizenship practices and experiences may give direction to the heated discussions on migrants' citizenship acquisition in Turkey.

Here, even though the issue of dual citizenship arose with the mass migration of Syrian nationals, it should be noted that this research involves not only participants under international protection, but instead, a variety of migrant groups with various reasons of settlement. This variety is the result of a selection based on the countries of origin with the highest numbers of migrants in Turkey. As a result, the various reasons of migration in this study include labor, security, education and finally, marriage. Moreover, the term of migrants is used inclusively so that refugees are considered as migrants as well<sup>2</sup>. At this point, it will be helpful to introduce migrants in light of their countries of origin and reasons of migration.

Among the participants involved in this research, labor emigrants constitute the largest group and include the nationals of Azerbaijan, Georgia, Iran, Russia, Turkmenistan and Ukraine. In the second largest category, migrants from Syria and Iraq settle in Turkey for reasons of security and protection. To continue, ethnically Turkish migrants from Bulgaria and some Iranian nationals migrated to Turkey for education. Finally, the smallest category,

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<sup>1</sup> [http://www.bbc.com/turkce/haberler/2016/07/160703\\_erdogan\\_suriyeliler](http://www.bbc.com/turkce/haberler/2016/07/160703_erdogan_suriyeliler)

<sup>2</sup> This thinking is in line with Jorgen Carling's opinions on the two opposing views, which he calls inclusivist and residualist. An inclusivist usage of the term "migrant" holds that migrants have changed their country of residence, irrespective of reason. This approach is critical to the vision of migration management for the benefit of all. Conversely, the residualist view sees migrants as people who have moved to another country for any reason other than to seek international protection as refugees. Please see <https://www.merit.unu.edu/the-end-of-migrants-as-we-know-them/>.

which is migrants who settle in Turkey for marriage are nationals of Russia, Germany and Azerbaijan.

In light of the findings on the impacts of dual citizenship on citizenship dimensions in Turkey's immigration space, this study brings forward a new concept- *sesqui citizenship*, which further differentiates patterns of dual citizenship. Signifying "one and a half", *sesqui citizenship* highlights the asymmetrical, unbalanced weight of citizenship dimensions through the perspectives of migrants, sending states and host states. While dual citizenship implies homogeneity independent of context and appears as a particularly advantaged status for migrants, *sesqui citizenship* underlines "less than wholeness" of dual citizenship. Accordingly, dual membership may not necessarily lead to functioning citizenships in both polities. In this regard, *sesqui citizenship* not only reveals actors' unsymmetrical attention and practices of various citizenship dimensions, but also describes the asymmetry between the viewpoints of sending states, Turkey as host state and migrants concerning dual citizenship.

To avoid falling into the same pitfall of producing a monolithic and universal notion, a point of warning is necessary here. *Sesqui citizenship* is yet the seed of a thought that requires a detailed unpacking in diverse contexts. For a complete unpacking, the conditions which lead to dual citizenship to be transformed into "one and a half citizenship" in each actors' perspective need to be completely understood. This notion also needs more sophistication based on the actors in the Turkish migration scene.

The most immature point in the research is the inadequate differentiation of sending states. From the perspective of sending states, the understanding of the conditions that produce a "less than whole citizenship" for migrants requires the full comprehension of the nature of citizenship in those sending countries, which this research cannot explain. Instead of drawing general conclusions on the typology of sending state citizenships, this study is only able to concentrate on the impacts on dual citizenship and categorize the sending states based on themes, such as their approaches towards dual citizenship, rights and duties without linking them to the reasons behind those approaches or a more general typology. Still, *sesqui citizenship* here will serve as a preliminary contribution toward the differentiation of citizenship.

Setting the stage for the research, this chapter will primarily present the *conceptualization* and *contextualization* of dual citizenship within the framework of the

research. Next, the *gaps in the literature* will be introduced not only to set the pathway for this research but also to locate its position among the existing studies of dual citizenship. Finally, the *outline of the dissertation* will present the overview of the research contents.

## **1.1 Conceptualization of dual citizenship**

Dual citizenship is defined as a legal status which rests on overlapping membership in at least two nation states and where political membership bypasses state territory, giving birth to a multi-nationalized membership (Faist 2007; Faist and Kivisto 2007). Dual citizenship, however, is not equivalent to dual nationality. While dual nationality refers solely to legal status in several states and subjection to state law and power, dual citizenship also refers to rights and obligations a person holds in all countries of citizenship (Bauböck et al. 2006; Faist 2007; Jones-Correa 2001).

In terms of the conceptualization of dual citizenship vis-à-vis states, this institution calls into question any one state's right to claim a monopoly on the membership of its citizenry (Faist and Kivisto 2007). Hence, dual citizenship challenges one of the most stable and long-standing notions of the modern era, which is the nation-state (Howard 2005). However, rather than states being displaced as the sites of citizenship; increasing instances of dual citizenship multiply the national sites of citizenship (Bosniak 2002). In this regard, Faist (2007) locates this institution between "exclusive citizenship in bounded political communities and denationalized citizenship" (Faist 2007, 3).

With regards to migrants, dual citizenship underlines the increasing likelihood of migrants' maintenance of ties to more than one country, creating new patterns of belonging in today's world (Sejersen 2008). At the migrant level, Faist describes this institution as an "instance of internal globalization" due to dual citizens' overlapping membership in more than one polity (Faist 2007, 3). Thus, the institution of dual citizenship functions as a kind of official legitimization of multicultural identity and may enhance migrants' esteem and self-respect in the host country (Faist and Gerdes 2008).

With the three actors of sending and receiving states and migrants in its equation, dual citizenship becomes a complex phenomenon. This complexity is not only rooted in the states' different approaches towards immigrants and emigrants who receive a second citizenship and the gap between states' administrative and actual dual citizenship practices both of which will be explored in this chapter, but also due to the multiple ways to acquire

dual citizenship (Blatter et al. 2009). Hence, an overview of the general routes to dual citizenship is at place here.

Fundamentally, a migrant becomes a dual citizen through the same eligibility criteria for citizenship except the cases where a state puts forward provisions against dual citizenship (Sejersen 2008, 529). Such restrictive provisions may make the acquisition of a second citizenship either impossible or conditional on the renunciation of the original citizenship (Sejersen 2008, 529). Unless such restrictions exist, dual citizenship occurs through three routes (Sejersen 2008, 529).

In the first route, an individual is born to parents who have different citizenships both of which are determined by the *jus sanguinis* principle. Here, the individual automatically becomes a dual citizen through birth. In the second route, an individual is born in a country with *jus soli* legislation to parents whose origin country has the *jus sanguinis* legislation (Sejersen 2008, 529). Thus, similar to the first route, the individual is a dual citizen from birth on. In the last route, a migrant receives a foreign citizenship without renouncing the original citizenship and hence becomes a dual citizen either through voluntary acquisition or through marriage. These three routes to obtain dual citizenship are often handled through different laws in origin countries. Nevertheless, dual citizenship by birth is more often tolerated in comparison to dual citizenship by a migrant's voluntary acquisition (Sejersen 2008, 529). Along these lines, states generally allow dual citizenship if the second citizenship is acquired automatically such as through marriage with a foreign national (Schuck 2002). A migrant's voluntary acquisition of a foreign citizenship, however, is the most debated mode of dual citizenship.

To further add to this complexity revolving around dual citizenship, it should be noted that the institution of dual citizenship does not always easily allow a dichotomous categorization between official forbiddance and state tolerance (Sejersen 2008). In the face of increasing international migration flows, many states may prefer to turn a deaf ear to the cases of dual citizenship despite an official legislation that may not tolerate dual citizenship. Hence, as dual citizenship laws may not be in symmetry with their enforcement, an official legislation only partially discloses the dual citizenship situation in the country (Sejersen 2008, 531).

Moreover, while both the official legislation and its enforcement may be crucial determinants in migrants' citizenship decisions, they may not always be in line with migrant

practices on the ground. In point of fact, migrants from countries that ban dual citizenship may still acquire foreign citizenship especially in the cases where a host country does not strictly require the renouncement of previous citizenships (Sejersen 2008, 531). Thus, not only the structural elements of official legislations and the authorities' interpretation of these laws, but also an understanding of migrants' practices of dual citizenship are critical in revealing how dual citizenship functions on the ground, in the context of Turkey.

Following this conceptualization of dual citizenship, the contextualization here will frame dual citizenship based on its historical context and the existing situation within a triadic setting that consists of sending and receiving states and migrants.

## **1.2 Contextualization of dual citizenship**

To begin with the historical context of dual citizenship, despite its emergence being a recent phenomenon, the opposition against this institution has a long tradition due to its contradiction with the citizenship notion based on single membership and territorial circumscription (Blatter 2011; Escobar 2006; Howard 2005). The resistance against dual citizenship surpassed national borders in 1930 with the "*Convention on Certain Questions Relating to the Conflict of Nationality Laws*" which reflected the *League of Nations*' assertion of mono-citizenship (Howard 2005). In the aftermath of the Second World War, the *International Law Commission of the United Nations* further strengthened this insistence on the singular citizenship principle in 1954 (Koslowski 2000). Finally, the *Council of Europe*'s "*Convention on the Reduction of Cases of Multiple Nationality*" aimed to reduce the instances of dual citizenship (Howard 2005). In spite of this resistance, increasing international migration across the globe has weakened the perception that dual citizenship is a threat against states.

Today, little reliable data exists on the actual number of dual citizens because most countries cannot verify how many of their citizens hold other countries' citizenship (Howard 2005). Still, as the result of a major shift in global attitudes toward this institution in the last twenty years, dual citizenship has become a legislative practice in approximately half of the countries and a normal status for millions (Sejersen 2008).

In the contextualization of dual citizenship with regards to states, a state's location in the international migration system is the key determinant in the governance of migration and the approach towards dual citizenship. The key issues in sending states' policy changes to



deal with increasing emigrant populations are the extension of citizenship and citizenship rights beyond state territory (Escobar 2006). For the receiving states, however, the simultaneous processes of liberalization and securitization of citizenship and the difficulties of setting membership criteria mark the issue of dual citizenship (Faist 2007). Hence, despite the general expansion of state tolerance towards dual citizenship in response to increasing migration across the globe, migrant sending and receiving countries often approach this institution dissimilarly (Blatter et al. 2009).

In this light, on the one hand, sending countries have traditionally been more in consent with dual citizenship due to its instrumentality to reassert sovereignty beyond territorial boundaries (Brand 2006, 26; Faist 2006; Faist 2007). Even among migrant sending states, however, approaches towards this institution are not homogenous. To illustrate, some sending countries view the dual citizenship of their non-resident citizens through a security-oriented perspective and take various measures ranging from the requirement of foreign citizenship acquisition to the loss of migrants' original citizenship in cases of dual citizenship. Still, the general inclination of migrant sending states is to maintain and foster transnational links with emigrants through the toleration of their dual citizenship. Various reasons behind this tolerance include states' expectations of migrant remittances, future investments or political attachment to origin countries and the state opportunity for political influence on the emigrant lobbies in host countries (Barabantseva and Sutherland 2011; Faist 2007; Jones-Correa 2001).

Receiving countries, on the other hand, have historically been more suspicious of dual citizenship due to the numerous questions surrounding the matters of integration (Barabantseva and Sutherland 2011, 1). Due to the formation of increasingly fragmented societies with diverse immigrant groups who have their own national identity, the root of the dual citizenship debate in receiving states regards the conflict immigration creates with the theoretical construction of an ideal nation state (İçduygu and Şenay 2008). In this context, through the reframing of migrants' access to dual citizenship with problems such as unemployment, criminality and social insurance schemes, concerns over migrant integration are frequently employed in migrant receiving countries as political instruments (Gerdes et al. 2007, 53).

Overall, for both sending and receiving states, the concept of nationhood is a critical determinant of the approach towards dual citizenship. In this regard, the adoption of a republican tradition and a civic concept of nationhood or an exclusive model based on an

ethno-cultural tradition and an ethnic concept of nationhood reveals the boundaries of citizenship and uncovers the distinctions between members and outsiders (Brubaker 1992). Henceforth, a state's republican understanding of nation leads to more inclusive measures for immigrant integration (Faist 2007). A more ethnically and culturally defined concept of nation, per contra, tends to be more exclusive towards immigrants regarding their citizenship acquisition concurrent with an exclusionist perspective that offers poor prospects for immigrants in the same countries (Faist 2007). Therefore, the acceptance of dual citizenship may not necessarily serve to celebrate the multiple ties of citizens in a globalizing world. Instead, it is possible to observe re-ethnicizing and re-nationalization of citizenship in connection with the ideological orientation of the state (Joppke 2007; Wodak 2013).

To conclude with the contextualization of dual citizenship with regards to states, the understanding of nationhood does not alone account for states' divisions over the topic of dual citizenship. Other crucial factors include the complex belief system around the issue of migrants' integration and the relationship between individual rights and state sovereignty (Faist 2007, 3). Hence, as migration histories, citizenship characters and democratization processes in each country are heterogeneous; the institution of dual citizenship should be analyzed at the national level (Wimmer and Glick Schiller 2002). On this account, discussions on dual citizenship can be considered a litmus test for a wide spectrum of attitudes in both sending and receiving states with regards to membership and belonging.

Next to sending and host states, the final actor in the contextualization of dual citizenship is the international migrant. For individuals who settle in another country, pragmatically, formal citizenship acts as a prerequisite for personal security and protection under the law and equal access to social and political rights (İçduygu 1996). Moreover, dual citizenship facilitates the option to remain in the host country by enhancing participation and socioeconomic integration together with the facilitation of return to origin countries (Faist and Gerdes 2008; Jones-Correa 2001). Hence, migrants generally support the recognition of dual citizenship (Jones-Correa 2001).

Following this contextualization of dual citizenship with regards to states and international migrants, the next section will specify the gaps in the dual citizenship literature and determine the course of this study in response to these limitations.

### 1.3 Gaps in the literature

Several gaps in the dual citizenship literature draw attention to the existing limitations in this line of citizenship research. These include, first, the constraints in relation to the geographical concentration of dual citizenship, second, the insufficient incorporation of the relevant actors due to an emphasis on the receiving country and finally, the fears and expectations surrounding dual citizenship which may often not mirror the actual practices of dual citizenship. Hence, this section will first examine each of these limitations and having presented the gaps in the literature, will introduce the routes adopted in this research for a more integrative understanding of dual citizenship.

First and foremost, dual citizenship studies are typically restricted to the migrant receiving states in the Western context. These studies mostly examine the institution of dual citizenship with regards to its impacts on migrants' political incorporation in the host countries (Bloemraad 2004; Dronkers and Vink 2012; Fitzgerald et al. 2014; Liebig and Von Haaren 2011). In this regard, the geographical concentration of dual citizenship studies limited to the West and excluding the receiving states beyond Western Europe and North America may lead to a narrow understanding of this institution.

Furthermore, despite this attention on the receiving states, not all subject matters in the context of receiving states have drawn the same interest. Overshadowed by the emphasis on matters related to integration and political participation, some other issues also closely linked with the institution of dual citizenship have not received much scholarly attention. Among these issues that partially remain in the dark, one can consider the notion of selective tolerance, which, in this context, would be the tolerance of dual citizenship for migrants with a certain background. Here, the question of preferential admission or "who belongs?" has received attention in linkage with the reasons behind why some countries easily let immigrants become permanent as ethnic minorities while other countries have highly restrictive policies (Bauböck 2009; Castles and Miller 2009; Dumbrava 2014; Joppke 2005; Rubenstein 2003). However, the notion of selective tolerance has not been studied in-depth in relation to dual citizenship. In this concern, selective tolerance with regards to migrants' maintenance of their original citizenship in the non-Western context remains a theme yet to be examined.

Secondly, despite the abundant literature on host state perspectives towards dual citizenship, dual citizenship literature is mostly void of the perspective of migrant sending

states and their impacts on migrants' practices of dual citizenship (Jones-Correa 2001; Vink 2013). Here, perceiving migration as a linear concept limited to a one-way move from an emigration to an immigration country is insufficient to understand the whole process of international migration and dual citizenship (Gidley and Caputo 2013, 15). In this light, further exploring the role of sending countries is crucial to understand the institution of dual citizenship (Vink 2013).

Next to the missing perspective of sending states, the migrant perspective is also lacking in most studies of dual citizenship (Benhabib 1999). Migrants' attachments and experiences are often not paid close attention due to the state-centered concentration on the broader legal and political aspects of citizenship (Blunt 2007; Ehrkamp and Leitner 2003). Furthermore, as existing studies at the migrant level often concentrate on individuals' transnational living across borders rather than the impacts of their official memberships, the dynamic relationship between the individual and the state is disregarded (Sejersen 2008). To shed light on this reciprocal relationship, immigrants' perceptions and attitudes concerning their own positions and resistance or embracement of dual citizenship need further attention (İçduygu 2005; Kivisto 2007).

Finally, as the last limitation in the dual citizenship literature, the institution of dual citizenship is encircled by labels ranging from, in Faist's words, being "evil" to representing an "intrinsic value" for political communities (Faist 2001, 26). On one pole are the opinions concentrating on the gloomy impacts of dual citizenship on traditional citizenship and integration. These consider dual citizenship to lead to a paralysis of formal citizenship as a result of complications in the rights and duties, which include obedience to law, taxation, military service, voting and diplomatic protection. To continue with the suspicions over integration, the underlying question is whether a migrant holding dual citizenship and hence, the option of return, would really make an effort for integration in the host country, perceived as economic, social and political participation and in terms of belonging. On the other pole are positive opinions on the impacts of dual citizenship on migrants' integration in the host countries, which consider the toleration of dual citizenship as the key catalyst in migrant integration.

From an overall standpoint, these gaps in the literature both arise from and lead to the perception that dual citizenship is as a universally homogenous institution. In point of fact, it is already acknowledged that dual citizenship entails two asymmetrical memberships with one citizenship for which all rights and duties operative and a second citizenship, which

remains inactive as a long distance citizenship (Harpaz 2000; Faist 2000). However, no further distinctions have been explored to shed light on how different contexts may shape the operation of dual citizenship and how dual citizenship actually functions with regards to various citizenship dimensions. With such homogeneity, dual citizenship is reduced to a monolithic and linear institution largely divorced from context, content and condition. In light of these limitations, this research takes three routes to contribute to the existing theoretical and empirical literature on the institution of dual citizenship.

The first route is to move the context of dual citizenship beyond Western Europe and North America by employing Turkey as a case of migrant receiving country from the global south. This change of research setting puts the assessment of dual citizenship under a new light. To continue, in response to the traditional concentration on the receiving states, the second course is to move the dual citizenship institution into a triadic structure to incorporate sending states and migrants. The aim here is to adopt a balanced approach towards all actors in the dual citizenship equation. With this aim, not only the host state situation, but also sending states' approaches towards dual citizenship are assessed through their official legislations and authorities' interpretations of the existing dual citizenship laws and practices. Concurrently, migrants are voiced to reveal their perspectives and practices of citizenship acquisition and maintenance of dual citizenship.

The third direction in this research is to move beyond the exaggerated hopes and fears attached with the institution of dual citizenship by taking a middle, more nuanced position towards dual citizenship. To avoid falling into the trap of these hyperboles, Kymlicka and Norman's (2000) citizenship dimensions of formal status, activity and identity are employed for a coherent analysis of dual citizenship. In this direction, further categorizations based on the existing literature help to explore how dual citizenship functions in these three citizenship dimensions. Firstly, the analysis of formal dimension in this research constitutes of citizenship rights and duties in line with Kymlicka and Norman's (2000) perspective of formal citizenship. Secondly, the citizenship dimension of activity is further classified following Oers' thinking (2013), into migrants' political, social and economic participation. Finally, in the assessment of the particular identities constituting Kymlicka and Norman's (2000) identity dimension of citizenship, the sources of identity such as ethnicity, nationality, religion and gender are selected based on their relevance to the context of this research and existing literature on the citizenship process in Turkey. In this dimension, the research follows Carens' steps (2000) in the comprehension of the feelings of

belonging, emotional attachment and loyalty to the host country as the key elements of identity.

Hence, employing the case of Turkey as a migrant receiving state from the global south and taking into consideration the triadic setting of international migration with a balanced approach, this research examines how dual citizenship affects traditional citizenship through an assessment of citizenship dimensions. By locating dual citizenship in a non-Western setting, broadening the actors involved and dissecting citizenship in dimensions of status, activity and identity, this study contributes to the existing citizenship literature by establishing a further differentiation of the dual citizenship status.

#### **1.4 Structure of the dissertation**

Following this *introduction*, the second chapter titled *research: design and purpose* concentrates on the *purpose of research*, the specific *research questions, methodology and case selection*. Here, the case selection includes *dual citizenship in Turkey's immigration space*, which focuses on the official dual citizenship legislations of the host and sending states in the scope of this research. Next, the *background information on migrants* introduces the migrants involved in this study through their reasons of migration, modes of entry and settlement, practices and reflections on the acquisition of residence and work permits in Turkey and opinions on the value of citizenships. Finally, *limitations of the research* are presented in this chapter.

The third chapter, *revisiting the dual citizenship literature*, concentrates on the two focal points in the dual citizenship literature based on the three dimensions of citizenship and through the perspectives of sending and host states and migrants. The first focal point is the *impacts of dual citizenship on the legal status dimension of citizenship*, which includes the citizenship duties of obedience to law, taxation and military service and citizenship rights which consists of voting in elections and diplomatic protection. The second focal point in the studies of dual citizenship concerns *the impacts of dual citizenship on the activity and identity dimensions of citizenship*. Here, the two lingering questions in the dual citizenship literature are, first, whether dual citizenship paralyzes the formal status of citizenship and second, whether dual citizenship acts as a barrier against or as a catalyst of integration in the host states. Despite that these questions reduce the complexity and multiplicity of dual

citizenship, this chapter distinguishes the existing scholarly work on this institution in terms of the citizenship dimensions, which serve as the foundational structure of the research.

The fourth chapter, *case of Turkey*, relocates the attention on dual citizenship from the West to the context of Turkey and introduces Turkey's migration space as the research setting. Here, it should be noted that this chapter involves Turkey's both emigration and immigration scenes for a thorough understanding of the research setting. Following the *overview of international migration* in Turkey to highlight the transformation from a traditional country of emigration to a receiving country with intensifying immigration, *a background for the status dimension of dual citizenship* sheds light on the formal citizenship acquisition in Turkey with an emphasis on rights and duties in the context of both emigration and immigration. Consequent to the assessment of this first dimension of citizenship, the next section presents a *background for the participation and identity dimensions of dual citizenship* in Turkey's international migration space. Thus, this chapter sheds light on the dual citizenship context of Turkey through the three citizenship dimensions.

The fifth and sixth chapters present the empirical findings in relation to host and sending states and migrants involved in this research. The fifth chapter concentrates on the *impacts of dual citizenship on the legal status dimension of citizenship* constituting of first, *citizenship duties* including obedience to law, payment of taxes and military obligations and second, *citizenship rights* consisting of voting and access to diplomatic protection. In the assessment of how dual citizenship operates in the formal dimension of citizenship and affects the traditional institution of citizenship, the question at the core is whether dual citizenship leads to a paralysis of formal citizenship due to overlapping membership in different polities.

The sixth chapter of this research concentrates on the *impacts of dual citizenship on the identity and activity dimensions of citizenship*. Here, first, the *citizenship dimension of activity* consists of participation in the political, economic and social life of the community. Second, the *citizenship dimension of identity* includes the assessment of particular identities of ethnicity, nationality, religion and finally, gender. These dimensions are assessed with the core question of whether dual citizenship operates as a barrier against or catalyst of integration. The underlying question here is whether a migrant holding dual citizenship and hence, the option of return, would actually make an effort for integration.

In the *conclusion* chapter of this study, first, the *summary of research findings* is presented. Next, in the *contributions to the literature*, having broadened the analysis to include all actors of migration and dissected dual citizenship in accordance with citizenship dimensions, the notion of *sesqui citizenship* is introduced based on research findings as a contribution to the existing dual citizenship literature. The final section titled *venues for further research* hopes to point at new directions where dual citizenship may be further explored.





## **CHAPTER 2**

### **Research: purpose and design**

#### **2.1 Purpose of research and research questions**

The purpose of this research is to examine how the institution of dual citizenship affects the traditional institution of citizenship based on Kymlicka and Norman's (2000) citizenship dimensions of formal status, activity and identity within a triadic setting that constitutes of major sending countries to Turkey, international migrants and the host state of Turkey. The examination of converging and diverging points between the positions and practices of the three actors in the institution of the dual citizenship is critical for a comprehensive insight on how dual citizenship transforms traditional citizenship.

This study takes three routes to contribute to the existing theoretical and empirical literature on the dual citizenship institution. The first route is to move the attention on dual citizenship from the West to the context of Turkey. Following Chaudhary's (2016) line of thinking that much of the existing literature and empirical research focusing solely on the traditional receiving countries are limited due to a lack of contextual factors in relation to sending countries, this study relocates the framework away from the known formula of Western citizenship to the context of Turkey. Dual citizenship studies in relation to Turkey have studied Turkey as a sending country (e.g. case of Turkish migrants holding dual citizenship with Germany) and not as a receiving country as it has recently become. Hence, for emancipation from the contextual restraints of the traditional focus on the Western context, this study examines Turkey as a receiving country and as the core context of this research.

The second route in this study is to move the dual citizenship institution into a triadic structure, which incorporates sending states and voices migrants instead of the traditional concentration on solely the receiving states. In spite of the wide citizenship literature that has emerged in linkage to international migration, dual citizenship remained limited to studies focusing on single level (either state or individual level) and single actor (mostly in terms of host country). However, a comprehensive and integrated analysis of dual citizenship requires the consideration of a triadic setting which balances the weight of the three fundamental actors of international migration, namely the host state, sending state and migrants. In this

regard, the triadic setting of international migration adopted in this research broadens the viewpoint of this research in comparison to single level and single actor studies of dual citizenship.

The third route is to move beyond the hopes and fears attached with the institution of dual citizenship and shed light on the focal points of the dual citizenship literature in accordance with the context of Turkey. The first focal point in the existing literature regards the impacts of dual citizenship on the formal dimension of the traditional institution of citizenship, often surrounded by fears concerning the negative influences of overlapping membership. The second issue is migrants' integration with the primary question being whether dual citizenship hinders or facilitates integration in the host country, encircled by hopes or suspicions in relation to participation and identity. Following Faist's thinking (2001) that these opinions are often widely exaggerated, this study aims to bring to light each actor's opinions and practices of dual citizenship to move beyond the hyperboles of hope and fear attached to dual citizenship in the Turkish context.

Overall, with the aim to assess how dual citizenship transforms traditional citizenship, the analysis of dual citizenship will be broadened to incorporate all actors of migration and elaborated by dissecting dual membership into citizenship dimensions. Within this frame, this research concentrates on the following questions:

1. How does dual citizenship transform the traditional institution of citizenship through the dimensions of formal status, participation and identity in a triadic setting of migrant sending states, receiving states and international migrants? How does dual citizenship function in these three citizenship dimensions?
  - a. Does dual citizenship paralyze formal citizenship? What are the impacts of dual citizenship on the legal status of citizenship?
  - b. Does dual citizenship operate as a barrier against or a catalyst of integration with regards to the dimensions of participation and identity?
2. How does the host state of Turkey approach dual citizenship in the context of Turkey's immigration space?
  - a. What is the procedure for foreign migrants' citizenship acquisition in Turkey?
  - b. What are the weights of citizenship rights and duties, activity in the form of political, economic and social participation and identity in terms of nationality, ethnicity, religion and gender in immigrants' acquisition of citizenship in Turkey and state tolerance of dual citizenship?
3. How do sending states approach their nationals' dual citizenship with Turkey?
  - a. Do the major sending states in the context of Turkey's immigration space tolerate their nationals' dual citizenship?

- b. What are the weights of citizenship rights and duties, political, economic and social participation and identity in terms of nationality, ethnicity, religion and gender in migrants' acquisition of citizenship in Turkey and state tolerance of dual citizenship?
4. How do international migrants in Turkey approach dual citizenship with Turkey?
  - a. How do migrants approach Turkish citizenship and the maintenance of dual citizenship in terms of perceptions, opinions and practices based on the benefits, disadvantages and the meaning of citizenship?
  - b. What are the weights of citizenship rights and duties, political, economic and social participation and identity in terms of nationality, ethnicity, religion and gender in migrants' acquisition of citizenship in Turkey and their maintenance of dual citizenship?
5. How do sending and receiving states and migrants interact, conflict with and differ from each other concerning the formal status, participation and identity dimensions dual citizenship?

## **2.2 Methodology and case selection**

Embracing the qualitative research method, the empirical research in this study takes place at two levels. The state level involves, first, the analysis of the dual citizenship legislation in host and sending states and second, semi-structured in-depth interviews with sending and receiving state officials. The research at the state level sheds light on the structural context and not only concentrates on the official legislations, but also on the state practices on the ground. At the migrant level, the empirical research constitutes of semi-structured in-depth interviews with migrants from the major sending countries to Turkey. These interviews disclose migrants' perceptions, opinions and practices with regards to dual citizenship (See Appendix).

### *The first component: host state*

The first component of this study is the host state of Turkey, which serves as the context. The core of the empirical study on this component consists of, firstly, desk research on the official legislation and secondly, in-depth interviews with state officials. In the empirical study, an official from each and every stage of the citizenship process was interviewed to avoid any possible missing steps in migrants' citizenship acquisition in Turkey, starting from the officials who receive migrants' citizenship applications and ending with the final decision-makers of the process. Here, the main institution under focus is the *General Directorate of Population and Citizenship Affairs*, which functions as the key institution in the process of migrants' citizenship acquisition in Turkey.

Within this frame, the first interview was conducted with the *Head Officer of the Department of Citizenship Acquisition Operations*, which is the department that assists migrants on their citizenship applications and receives initial citizenship applications in Istanbul. In the next stage, as the migrants who fit in the citizenship criteria are evaluated by the Citizenship Committee through a citizenship interview, the second in-depth interview took place with the *Head Officer of the Citizenship Commission Services* in Istanbul. This officer prepares migrants' files for the Citizenship Committee prior to the interview for members of the Committee and in the aftermath of the Committee interview to be sent to the *Population and Citizenship Affairs* in Ankara for the final review. The third interview took place with the *Head of Population and Citizenship Services* in Istanbul who, upon the notification by the *Citizenship Commission Services*, organizes each applicant's interview by inviting Committee members from several other state institutions and arranges the bureaucratic details concerning the interview.

The following stage, then, is an applicant's interview with the Citizenship Committee. For an extensive data gathering on the Citizenship Committee interview that covers the process, formal criteria, interview questions, expectations from migrants and the weight of elements such as applicants' nationality, ethnicity, religion, gender, knowledge of Turkish and finally, marriage with a Turkish national, two Citizenship Committee members were interviewed. The first officer is a Citizenship Committee member from the *Directorate of National Education* in Istanbul, responsible of testing an applicant's knowledge of Turkish. The second Committee member is from the *Foreigners' Police* in Istanbul who makes a security check on the applicant before the interview and questions the migrant on his activities during the interview through a security perspective.

Consequent to a migrant's Citizenship Committee interview, a positive interview result is sent to the *General Directorate of Population and Citizenship Affairs*, which forwards the file, based on the findings of this study, to Turkey's *National Intelligence Organization* for a more intensive security check, especially to investigate whether a migrant is related to terrorist groups. With the completion of the security clearance, a migrant's file is re-sent to the *General Directorate of Population and Citizenship Affairs* that gives consent to the positive decision of the Citizenship Committee. Hence, the sixth interview was with the *Head of the General Directorate of Population and Citizenship Office of Turkey* who is the highest officer in Turkey on this matter. Next, the final interview took place with the *Head of Beşiktaş Population and Citizenship Services* who, upon notification by the *Head of*

*Population and Citizenship Services in Istanbul* prepares a Turkish identity card for the new citizens and hence, is located at the final end of the citizenship process.

Overall, these in-depth interviews with Turkish state officials took place between September and December 2016. Except in the case of the meeting with the *Deputy Governor*, no official letters were requested by the state officials prior to the interviews. All interviews were arranged by phone and within a very short time period of only a few days. Here, interestingly, not only the researcher did not need to present any documents in relation to her studies, but not even the researcher's identity card was asked prior to the interviews, including the meeting with the top official in Turkey on citizenship issues which is the *Head of the General Directorate of Population and Citizenship Affairs* in Ankara.

During the interviews, each officer was first asked about their mission in the citizenship acquisition process and the general route of citizenship acquisition in Turkey. To follow, the interviews included questions on the Turkish state's official dual citizenship legislation and dual citizenship practices on the ground. Next, state officials were requested to express opinions on citizenship rights and duties, political, economic and social participation and finally, identity in terms of nationality, ethnicity, religion and gender in cases of dual citizenship.

#### *The second component: sending states*

The second component of the empirical research is the sending states' approaches to dual citizenship. As Turkey receives regular and irregular, long and short-term international migrants from numerous countries as will be elaborated in *Chapter IV*, for practical reasons, this research concentrates solely on the major sending states to Turkey. In this regard, the first step of the sending state component of this study was the identification of the origin countries with most citizenship applicants in Turkey. Upon an official letter explaining the academic nature of the research and requesting data on the origin countries of citizenship applicants, however, the *General Directorate of Population and Citizenship Affairs* refrained from sharing the required data with the explanation that "*the requested information requires the basis of a separate or specific study, research review, or analysis, as described in Article 7 of the Information Acquisition Law and hence cannot be provided*".

Unable to attain the data on citizenship applicants in Turkey despite several attempts, an alternative step was to identify the origin countries of foreign migrants who hold residence permits in Turkey. This information was retrieved from the official website of the

*Directorate of General Migration Management*<sup>3</sup> (DGMM) which publishes yearly statistics concerning the presence of foreigners in Turkey. Accordingly, the highest numbers of migrants who hold residence permits in Turkey are from Iraq (33,202 migrants), Syria (32,578 migrants), Azerbaijan (32,476 migrants), Turkmenistan (22,891 migrants), Russia (22,377 migrants), Georgia (19,242 migrants), Ukraine (16,951 migrants), Uzbekistan (14,927 migrants), Libya (14,421 migrants) and finally, Iran (14,276 migrants).

Since non-citizens are not the sole focus of this research and migrants who received Turkish citizenship are also included, *Turkish Statistical Institute's* (TUIK) statistics on the origin countries of the highest number of foreign-born residents in Turkey (regardless of their residence status) was merged with the data received from the DGMM<sup>4</sup>. The origin countries of the highest numbers of foreign-born residents in Turkey were announced as Bulgaria (378,658 migrants), Germany (263,318 migrants), Iraq (97,528 migrants), Syria (76,413 migrants), Azerbaijan (52,836 migrants), Macedonia (43,400 migrants), Afghanistan (38,692 migrants) Iran (36,226 migrants), Uzbekistan (36,083) and finally, Russia (34,486) in the year 2015.

Thus, in light of the data received from the DGMM and TUIK, the list for major sending countries to Turkey became, in alphabetical order, Afghanistan, Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Libya, Macedonia, Russia, Syria, Turkmenistan, Ukraine and finally, Uzbekistan. However, as will be explained in the final section of this chapter among the research limitations, due to the researcher's inability of reaching any Afghan, Libyan and Macedonian permanent migrants residing in Istanbul, these three countries were omitted from the list of sending countries under focus in this study.

Following a research on these eleven sending states' official dual citizenship legislations that will be elaborated in the next section of this chapter, the empirical study involving in-depth interviews with consulate officials took place between May and October of 2016 in the consulate offices in Istanbul. All consulates were first phoned and then e-mailed for an interview arrangement. More specifically, interviews with the Georgian and Ukrainian Consulates were arranged by phone while Bulgarian and German Consulates were reached through e-mail for an appointment. The Consulates of Azerbaijan, Iran, Iraq, Russia,

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<sup>3</sup> Official website of the Directorate of General Migration Management: [http://www.goc.gov.tr/main/Eng\\_3](http://www.goc.gov.tr/main/Eng_3)

<sup>4</sup> Official website of the Turkish Statistical Institute: <http://www.tuik.gov.tr/>

Syria, Turkmenistan and Uzbekistan were reached neither by phone nor e-mail. Hence, they were visited to ask for an appointment with a consulate official. Here, the Consulates of Iran, Iraq, Russia and Turkmenistan immediately called in for a short interview. Uzbekistan was visited three times and half-heartedly, in the third visit, an official who hesitated to give out “secret information” and questioned the nature of the research agreed to answer the interview questions at the consulate’s garden.

Despite countless attempts that included phone calls, e-mails and visits, the Consulates of Azerbaijan and Syria refrained from the arrangement of an interview. With regards to the first country, the officer responsible of citizenship issues in the Syrian Consulate openly stated that he could not allocate time for a researcher. In the second case, the Consulate of Azerbaijan, despite many attempts both in Istanbul and Ankara, claimed that all the necessary information in relation to states’ dual citizenship legislations could be found over the internet. Hence, the in-depth interviews in this empirical research took place with nine consulates out of eleven sending states.

During the interviews, consulate officials were first asked about their official dual citizenship legislation and second, the dual citizenship practices on the ground. Thirdly, consulate officials were requested to describe their nationals’ experiences of settlement in Turkey and interest in Turkish citizenship. Finally, the interview included questions on the consulates’ opinions on their nationals’ citizenship rights and duties, political, economic and social participation and lastly, identity in terms of nationality, ethnicity, religion and gender in cases of dual citizenship.

### *The third component: international migrants*

The final component of the empirical research in the triadic structure of international migration constitutes of migrants from the major sending countries to Turkey. While the core method is chain-referral sampling or snowball sampling, migrants from Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine and Uzbekistan were reached through diverse ways. These include migrant and solidarity associations, tourism agencies, restaurants serving ethnic cuisine, domestic help agencies and social media. All interviews with migrants took place between March and December 2016 and face-to-face. The starting points in the search for the international migrants from the selected origin countries were as follows;

- For migrants from Azerbaijan, the *Azerbaijan Turkey Association* was the starting point. In addition to this association, several Azeri migrants were reached through a Facebook search of “Azeris in Istanbul”.
- For migrants from Bulgaria, *Culture and Solidarity Association of Balkan Migrants* was the core institution through which all interviews were arranged.
- For migrants from Georgia, a Georgian bus company in Fatih (as suggested by the Georgian Consulate) and two Georgian restaurants, which function as meeting places for Georgian migrants were the starting points.
- For migrants from Germany, an association that connects German women residing in Istanbul, namely, *Bruecke Istanbul* was helpful. However, as the members of this association are usually the elderly, younger German migrants were reached through a Facebook search of “Germans in Istanbul”.
- For migrants from Iran, an Iranian travel agency and two Iranian restaurants in Aksaray were helpful.
- For migrants from Iraq, the *Culture and Solidarity Association of Iraqi Turkmens* was visited many times during its regular meetings. Iraqi migrants were also reached through an Iraqi restaurant in the district of Fatih.
- For migrants from Russia, as the several Russian Cultural Centers in Istanbul were not helpful, Facebook groups such as “Russians in Istanbul” constituted the starting point of research.
- For migrants from Syria, *Okmeydanı Solidarity Association*, founded to assist the disadvantaged neighbors in the vicinity helped to reach Syrian migrants in return for a Syrian interpreter to be paid for her translation services.
- For migrants from Turkmenistan, with the help of a domestic work agency that arranges employment for Turkmen migrants, a Turkmen migrant reached her acquaintances through a *Whatsapp* group of her nationals in Istanbul. These migrants were paid 20 TL per interview.
- For migrants from Ukraine, *Culture and Solidarity Association of Crimean Turks in Istanbul* was the starting point.
- For migrants from Uzbekistan, four Uzbek restaurants in Kumkapı where Uzbek migrants meet were helpful.

Hence, in-depth interviews were held with a total of 72 migrants from the major sending countries to Turkey- from Azerbaijan (six migrants) Bulgaria (seven migrants),



Georgia (five migrants), Germany (four migrants), Iran (nine migrants), Iraq (seven migrants), Russia (seven migrants), Syria (twelve migrants), Turkmenistan (six migrants), Ukraine (four migrants) and Uzbekistan (five migrants) (See Appendix). With 22 male and 50 female migrants most of whom settled in Turkey after the 2000s for reasons of employment, education, marriage and protection, the analysis presents a rich variety of migrant profiles.

With regards to their legal status, while 22 migrants involved in this study hold dual citizenship with Turkey, 12 migrants hold temporary identity cards provided for Syrian nationals, five hold student visas, four hold tourist visas and three migrants hold work permits. As the largest group, 26 migrants hold regular residence permits. Among the non-citizens involved in this study, ten migrants are at various stages of their Turkish citizenship application process. Among the eighteen migrants uninterested in Turkish citizenship, nine migrants hesitate to apply for citizenship due to the dual citizenship laws of their origin country.

During the semi-structured interviews, migrants involved in this study were asked about their reasons of migration to Turkey, opinions and experiences of the migration and settlement process in the host country, integration, legal status and citizenship acquisition and finally, dual citizenship with Turkey. To understand how dual citizenship functions in relation to citizenship dimensions of formal status, activity and identity, questions were directly asked on the topics of rights and duties, participation, and finally, the feelings of belonging towards the origin and host country to disclose migrants' perceptions of their main country of citizenship. While the questions asked in relation to citizenship dimensions serve directly to the core of this research in relation to dual citizenship, questions on the opinions and experiences of migration and settlement process serve to shed light on the context in which these opinions are shaped.

### **2.3 Dual citizenship in Turkey's immigration space**

Following the section on the methodology and case selection, this section will provide the preliminary research on the dual citizenship situations in the host and sending states involved in this study. The empirical research with state officials will further build on this data for a comprehensive understanding of the state approaches to dual citizenship.

### *The first component: host state*

With regards to the first component within the triadic setting that serves as the context, the host state of Turkey witnessed massive emigration in the 1960s and 1970s and extensive immigration during the 1990s and 2000s (İçduygu 2014). Turkey allows dual citizenship for Turkish emigrants abroad since 1981. Furthermore, Turkish Citizenship Law does not force its citizens born with dual citizenship to choose one citizenship when they reach the age of 18 (İçduygu 2008). Here, importantly, before the shift in the state attitude concerning Turkish emigrants and their dual citizenship in 1981, dual citizenship was already acceptable for foreigners who wanted to acquire Turkish citizenship (Tiryakioğlu 2006). In this regard, Turkish Citizenship Law permitted dual citizenship for foreigners without necessitating the renouncement of previous citizenship in a time when Turkish citizens were not allowed to acquire dual citizenship (Tiryakioğlu 2006). Today, with the *Citizenship Law of 2009*, citizens of several (unknown) countries may be required to give up their original citizenship. Overall, as will be assessed in detail in Chapter IV, taking into consideration the vagueness of several clauses and the lack of transparency on the countries with which dual citizenship is not allowed, the legislation concerning immigrants in Turkey is not as liberal in comparison to the Turkish emigrants abroad. Despite this vagueness and the reservation to require migrants to relinquish their original citizenships, nevertheless, Turkey allows dual citizenship for immigrants residing in Turkey according to the *Citizenship Law of 2009*.

### *The second component: sending states*

Concerning the second actor of international migration, this section presents the legal aspects of dual citizenship in the major sending countries of Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine and Uzbekistan in alphabetical order.

#### Azerbaijan

Azerbaijan's current Citizenship Law, adopted in 1998 and based primarily on the principle of *jus sanguinis*, does not accept dual citizenship and thus, anyone who voluntarily applies and obtains foreign citizenship automatically loses Azerbaijani citizenship (COE Azerbaijan). In such cases, law permits the recovery of Azerbaijani citizenship if the person

renounces the acquired foreign citizenship (COE Azerbaijan). Still, based on Article 10 of Azerbaijan's Citizenship Law, when an Azerbaijan citizen has dual citizenship, the state does not recognize that person's belonging to citizenship of a foreign state (UNHCR Azerbaijan). Additionally, those who receive another citizenship should notify a relevant body of executive power within one month (UNHCR Azerbaijan). According to the same article, the failure to provide such information by those persons may lead to a punishment (UNHCR Azerbaijan). Thus, Azerbaijan's official legislation does not allow dual citizenship under any circumstances (Faist and Gerdes 2008; Sejersen 2008).

## Bulgaria

Bulgarian citizenship is mainly determined by the *jus sanguinis* principle and governed by the Bulgarian Constitution and the Citizenship Law of 1999. According to Article 3 of the Citizenship Law, a Bulgarian citizen who is also a citizen of another state is considered only as a Bulgarian citizen in his relationship with Bulgaria. Here, the Constitution brings the limitation that parliament members and presidential candidates are not allowed to hold a foreign citizenship (Smilov and Jileva 2013, 11). A major issue in relation to dual citizenship was the ongoing tension concerning the status of the ethnically Turkish community. In the 1980s, Bulgaria's communist regime adopted a negative policy towards the Turkish minority in Bulgaria, which forced great waves of emigration to Turkey. After the one-party system collapsed in 1989, only some resettled in Bulgaria (Kadirbeyoğlu 2009). Instead, many members of this community decided to settle in Turkey permanently after 1989 and acquired Turkish citizenship despite the fact that Bulgaria's official legislation banned dual citizenship. Thus, Bulgaria's citizenship policy needed alteration to remedy the former injustices against the Turkish community and their forced migration (Liebich 2000, 105). While the 1991 Constitution remained silent on the possibility of dual citizenship, Bulgaria's Citizenship Law of 1999 made provisions for allowing Turks to reclaim their Bulgarian citizenship (Özgür-Baklacioğlu 2006, 322).

Even after the granting of the right to hold a foreign citizenship was accepted, however, questions concerning the ethnic Turks who had reacquired Bulgarian citizenship but were not residing permanently within Bulgaria remained a critical political issue. Here, the political tension was rooted in dual citizens' voting rights (Smilov and Jileva 2013, 11). With the European Parliament elections in Bulgaria in 2007, the main question became

whether dual citizens who did not reside in the country had the right to influence Bulgarian politics (Smilov and Jileva 2013, 11). Debates over the introduction of specific residence requirements for voters in the European Parliament elections, which would disqualify their emigrants living in Turkey added to the politicization of this subject (Smilov and Jileva 2013, 11). Ultimately, the ruling coalition allowed all citizens to be enfranchised regardless of where they resided (Smilov and Jileva 2013, 11). Overall, as dual citizenship is allowed for the majority of the population, Bulgaria is considered among sending countries that tolerate dual citizenship (Faist and Gerdes 2008; Sejersen 2008).

## Georgia

Georgia's Citizenship Law maintains *jus sanguinis* as the central principle determining citizenship (COE Georgia). According to the first article of Georgia's Citizenship Law, a citizen of Georgia may not simultaneously be a citizen of another state (COE Georgia). Moreover, Article 32 of the same law considers the acceptance of another state's citizenship as a reason for loss of Georgian citizenship (COE Georgia).

Issues related to dual citizenship became of central concern due to the unknown status of former Soviet citizens in Georgia after the collapse of the Soviet Union (Gugushvili 2012). As the Citizenship Law of 1993 declared that all residents who had permanently lived in the country for more than five years would automatically acquire citizenship, former Soviet citizens in Georgia received Georgian citizenship (Gugushvili 2012). However, concerning emigrants, the low number of Georgian migrants holding foreign citizenship in the beginning of the 1990s did not give way to a high demand of dual citizenship and hence, dual citizenship debates in Georgia generally remained limited within the security framework (Gugushvili 2012). Here, the idea that dual citizenship is a Russian strategy to benefit from Russian speaking minorities in Georgia against national interests led to a negative opinion regarding dual citizenship (Gugushvili 2012). Interestingly, debates of dual citizenship in Georgia often arise in relation to political figures' citizenship status due to the fact that holding multiple passports is common among Georgian ministers<sup>5</sup>. To demonstrate, Georgia's Foreign Minister Vashadze had both Russian and Georgian citizenship during the

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<sup>5</sup> "The problems with dual citizenship in Georgia", The Messenger Online, May 31, 2013 [http://www.messenger.com.ge/issues/2872\\_may\\_31\\_2013/2872\\_edit.html](http://www.messenger.com.ge/issues/2872_may_31_2013/2872_edit.html) [accessed 9 August 2016]

Georgian-Russian War in 2008. Similarly, the Defense Minister Kezerashvili held both Georgian and Israeli citizenship. While these may point to the dysfunction of the ban on dual citizenship, the most recent development in this regard may prove otherwise. In 2015, the former president of Georgia, Saakashvili, lost his Georgian citizenship following his decision to take Ukrainian citizenship<sup>6</sup>. Thus, Georgia's ban on dual citizenship is a highly contested topic. While this sending state could be positioned among the countries that strictly ban dual citizenship, the easy and frequent practice of regaining Georgian citizenship may allow Georgia to be positioned among the countries that partially allow dual citizenship.

## Germany

In the case of Germany, a new Nationality Act recently replaced the Nationality Law of 1913 after highly controversial debates between major political parties and due to the need for alignment with the trend of recent European nationality laws (Hailbronner and Farahat 2015, 9). The new Nationality Act of 2000 facilitated naturalisation substantially for migrants, introduced a *jus soli* element in the modes of acquisition and finally, brought a stronger toleration of dual citizenship (Hailbronner and Farahat 2015). However, the toleration towards dual citizenship in German legislation is solely limited to the foreigners who apply for German citizenship and not German citizens who receive a second citizenship abroad (Hailbronner and Farahat 2015).

In this regard, German citizens who acquire a foreign citizenship lose their German citizenship if they do not first apply for a permit to retain their German citizenship (Hailbronner and Farahat 2015). Moreover, the request to retain German citizenship must be justified with reasons such as maintaining relations with close relatives or holding property in Germany (Pusch 2015, 4). In contrast to the former legal situation in which German citizenship was lost only when the citizen did not reside in Germany, the new Nationality Law brings the automatic loss of German citizenship upon a foreign citizenship even if the

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<sup>6</sup> "Saakashvili's Loss of Georgian Citizenship- What it means and what it doesn't", The Interpreter of Radio Free Europe, <http://www.interpretermag.com/saakashvilis-loss-of-georgian-citizenship-what-it-means-and-what-it-doesnt/> [accessed 9 August 2016]

"Saakashvili slams Georgian decision to revoke his citizenship", Radio Free Europe, December 4, 2015 <http://www.rferl.org/content/georgia-saakashvili-citizenship-stripped/27406996.html> [accessed 9 August 2016]

citizen resides in German territory (Hailbronner and Farahat 2015, 18). Hence, considering the legal right to maintain German citizenship upon permission, Germany's official legislation places the country among those that only partially tolerate dual citizenship.

## Iran

Iran's official legislation concerning the determination of citizenship is found in its Constitution, which contains mostly *jus sanguinis* elements (Farrokhi 2015, 159). According to Article 41 of the Constitution, an Iranian national's citizenship is withdrawn upon the acquisition of another citizenship. In other words, one's acquisition of a foreign citizenship amounts to deprivation of Iranian citizenship (Farrokhi 2015, 160).

Numerous cases concerning the detainment of dual citizens demonstrate Iran's harsh treatment of dual passport holders<sup>7</sup>. To illustrate a few recent cases among many others of the year 2016, Tanavoli, a world famous 79-year-old sculptor and painter holding Iranian and Canadian citizenships, had his passport seized at the airport before an international travel. Similarly, Afshar, a French-Iranian dual citizen and a former employee at the French embassy in Tehran, was arrested after arriving in Iran for a family visit. In another case, Hoodfar, a retired Canadian-Iranian professor of anthropology doing research on women's issues in Iran was also arrested and held in prison with no announced charges. Hence, the number of dual citizens lingering in Iranian prisons based on charges within the framework of national security has reached its highest level in 2016. According to one idea, the reason behind the increase in the threats after the nuclear deal is Iran's intentions to use dual citizens to extract economic concessions, to receive political and financial gains and most

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<sup>7</sup> See, for example:

"Iran without details indict several detainees who have dual citizenship", Wall Street Journal, July 11, 2016

<http://blogs.wsj.com/washwire/2016/07/11/iran-without-details-indicts-several-detainees-who-have-dual-citizenship/>

[accessed 11 August 2016]

"Iran: arrest shows peril for dual nationals", Human Rights Watch, February 2, 2016

<https://www.hrw.org/news/2016/02/15/iran-arrest-shows-peril-dual-nationals> [accessed 9 August 2016]

"Arrest of Homa Hoodfar in Iran shines light on dangers for dual citizens", The New York Times, June 10, 2016

[http://www.nytimes.com/2016/06/10/world/middleeast/arrest-of-homa-hoodfar-in-iran-shines-light-on-dangers-for-dual-citizens.html?\\_r=0](http://www.nytimes.com/2016/06/10/world/middleeast/arrest-of-homa-hoodfar-in-iran-shines-light-on-dangers-for-dual-citizens.html?_r=0) [accessed 9 August 2016]

"Why is Iran intensifying crackdown on dual citizens?", Al Arabiya English, August 12, 2016

<http://english.alarabiya.net/en/views/news/middle-east/2016/08/12/Why-is-Iran-intensifying-crackdown-on-dual-citizens-.html> [accessed 15 August 2016]

importantly, to send a message to the Iranian people, and the West, that its fundamental policies will not change<sup>8</sup>. Thus, Iran can be considered among the countries that have a strict ban on dual citizenship (Faist and Gerdes 2008, 18; Sejersen 2008, 532).

## Iraq

Iraq predominantly maintains a *jus sanguinis* policy and allows dual citizenship in its nationality law, which entered into force in 2006 (UNHCR Iraq). Prior to 2006, however, Iraq's official legislation required the loss of Iraqi citizenship upon the acquisition of a second citizenship. Today, based on Article 10 of the current law, an Iraqi who acquires a foreign citizenship retains Iraqi citizenship unless she renounced it. Even in the cases of renunciation, restoration is also possible upon residence in Iraq after a minimum of one year (UNHCR Iraq). Moreover, unlike Bulgaria where a dual citizen is primarily judged as a Bulgarian, Iraqi courts apply Iraqi laws on holders of Iraqi nationality together with that of a foreign state (UNHCR Iraq). The only limitation in the case of Iraq is the Section Four of the Nationality Law, which does not allow dual citizens to hold a top-level sovereign or security position unless they renounce of the second citizenship (UNHCR Iraq). Despite this limitation on dual citizens' holding offices, however, several key figures in the government hold multiple passports (UNHCR Iraq). This raises suspicions of divided loyalties and politicians' exit option if their policies end up badly for Iraq. Overall, based on the current legislation, Iraq can be considered among the countries that tolerate dual citizenship.

## Russia

Russian citizenship legislation, in force since 2002, determines citizenship mostly by the principles of *jus sanguinis* (Salenko 2012). In Russia's first liberal Citizenship Law of 1991, the legislator avoided incorporating the principle of non-recognition of dual citizenship and was partially tolerant of an additional citizenship (Salenko 2012). This partial toleration continued in the 2002 legislation. Primarily, Article 62 of the Russian Constitution allows a citizen to obtain a foreign country citizenship according to federal law or an international

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<sup>8</sup>“Why is Iran intensifying crackdown on dual citizens?”, Al Arabiya English, August 12, 2016  
<http://english.alarabiya.net/en/views/news/middle-east/2016/08/12/Why-is-Iran-intensifying-crackdown-on-dual-citizens-.html> [accessed 15 August 2016]

agreement of the Russian Federation (Salenko 2012). To continue, Article 6 of the 2002 Citizenship Law provides the regulations regarding dual citizenship (Salenko 2012). Accordingly, a citizen of the Russian Federation who also has another citizenship will be regarded only as a Russian Federation citizen, except for the cases stipulated by an international treaty or a federal law such as Tajikistan or Turkmenistan (Salenko 2012). Moreover, the acquisition of another citizenship will not cause the termination of Russian citizenship (Salenko 2012).

However, some regulations restricting dual citizenship have recently been introduced. Since August 2014, dual citizens are expected to notify Russian authorities within 60 days of receiving a foreign citizenship and the failure to inform the authorities in two months leads to a fine between 14 and 28 US Dollars (Salenko 2012). The intentional concealment of a second citizenship, moreover, brings either a fine of more than five thousand US Dollars or the obligation to perform 400 hours of compulsory community service (Salenko 2012). Several sources demonstrate that this regulation is in practice (Salenko 2012). In parallel with these regulations, according to some news articles of 2016, a high number of Russian dual citizens are being stripped of their Russian citizenship through consulates' refusal to renew their passports<sup>9</sup>. Under new regulations, Russian citizens not registered as living in Russia on February 6, 1992, will not be allowed to renew their passports even if they were renewed on previous occasions. Overall, despite its lingering questions of security and the recent regulations, Russia can be considered as partially tolerant of dual citizenship as it allows the majority of its population to acquire a foreign citizenship without the requirement of renunciation but only notification (Faist and Gerdes 2008; Sejersen 2008).

## Syria

Syria's dual citizenship legislation is embedded in its Nationality Law of 1969, which adopts the principle of *jus sanguinis* in determination of citizenship (SLJ 2016). According to the official legislation, while dual citizenship is partially tolerated only among the League of Arab Nations (Faist and Gerdes 2008), Syrian law considers a Syrian citizen with dual citizenship firstly as a Syrian (ECOI Syria). According to Article 10 of the Nationality Law,

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<sup>9</sup> "Russia quietly strips emigres of dual citizenship", Forward news, June 12, 2016 <http://forward.com/news/world/342136/russia-quietly-strips-emigres-of-dual-citizenship/> [accessed 15 August 2016]



a Syrian citizen is required to ask for permission to denounce his Syrian citizenship before acquisition of a foreign citizenship (ECOI Syria). The permission is granted only if all obligations and duties towards the state are fulfilled (ECOI Syria). Following the permission, if the applicant acquires the second citizenship, the Syrian citizenship is considered as denounced (UNHCR Syria). The lack of permission before acquisition may lead to a sanction with one to three months of detention or a fine (UNHCR Syria). Here, Article 21 also determines that the Syrian citizen who has emigrated permanently to a non-Arab country and whose absence from Syria exceeded three years, has not replied to the formal caution sent by the Syrian state within three months will be deprived of his citizenship by decree (Davis 1996). Still, through the Article 6 of the same law allows regaining Syrian citizenship through a request (Davis 1996).

Despite the official legislation on the subject, Syria does not appear to strictly require the abandonment of Syrian citizenship for migrants living abroad. To illustrate, the case of Arar, an engineer of Syrian- Canadian citizenship who was returned to Syria by Canada and other such cases demonstrate how dual citizenship with Syria is common (Forcese 2005; Stasiulis and Ross 2005). Within this frame, the fact that dual citizenship is allowed in the League of Arab Nations and that, similar to Georgia, the Syrian citizenship can be regained through request demonstrates Syria's partial toleration of dual citizenship.

## Turkmenistan

Turkmenistan determines citizenship predominantly based on *jus sanguinis* in its Citizenship Law, dated 2013 (UNHCR Turkmenistan). This law, according to Article 5, does not recognize dual citizenship and regards the cases of dual citizenship solely as citizens of Turkmenistan (UNHCR Turkmenistan). Concerning the critical issues in relation to dual citizenship in the case of Turkmenistan, in 1993, an agreement between Turkmenistan and Russia enabled the citizens of Turkmenistan to hold passports belonging to both countries. Unlike those who only have Turkmen passports, dual citizens were thus able to travel to Russia and other former Soviet states without a visa requirement and obtain visas for Western states easily (IWPR 2009). In 2003, this agreement was unilaterally revoked by Turkmenistan when a failed assassination attempt prompted the president to tighten border controls and forced dual passport holders to choose a side (IWPR 2009). In 2006, Turkmen authorities started refusing to issue new biometric passports to Turkmen citizens with

Russian citizenship on the ground that they had to renounce their Russian citizenship first (IWPR 2009). Those who chose to keep their Russian passports would lose ownership of their homes and property in Turkmenistan (IWPR 2009). Despite the improving relations between Turkmenistan and Russia in other areas in 2009, the uncertain status of dual citizens and the suspicion towards them continued<sup>10</sup>. Finally, in 2013, Turkmen citizens who also hold Russian passports were allowed to receive Turkmen travel documents<sup>11</sup>. Demonstrating the harsh practice of Turkmenistan's ban on dual citizenship, the US Embassy underlines that dual passport holders who travel to Turkmenistan may be required to renounce their Turkmen citizenship in order to be allowed to depart the country. Accordingly, the renunciation process of Turkmen citizenship takes approximately six months<sup>12</sup>. Thus, based on its official legislation, Turkmenistan can be considered as a country that strictly prohibits dual citizenship (Sejersen 2008, 532).

## Ukraine

Ukrainian citizenship is governed by the Law on Citizenship of Ukraine and by the Constitution mainly in accordance with the principle of *jus sanguinis* and partially by the principle of *jus soli* (Shevel 2013). Article 4 of Ukraine's Constitution declares "there shall be a single citizenship in Ukraine" (Poiedynok 2015, 112). In line with this, if a Ukrainian citizen has obtained the citizenship of another state, he is considered only as a Ukrainian citizen in his relations with Ukraine (Poiedynok 2015, 112). Thus, Ukraine's dual policy can be considered as restrictive. Limited to children and adolescents only, dual citizenship only allows the birth mode of acquisition and requires the choice for one of the two citizenships on reaching maturity (Blatter et al. 2009). However, interpretations of this article on single citizenship vary greatly (Poiedynok 2015).

According to one approach, as demonstrated by the Article 19 of the Law on Citizenship, the voluntary acquisition of a foreign citizenship by a Ukrainian adult constitutes a ground for the loss of Ukrainian citizenship (Poiedynok 2015). According to the

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<sup>10</sup> Radio Free Europe/Radio Liberty, *Dual Russian citizens to get Turkmenistan travel papers*, 14 June 2013, <http://www.refworld.org/docid/51d6cae115.html> [accessed 15 August 2016]

<sup>11</sup> *ibid.*

<sup>12</sup> US Embassy in Turkmenistan:

[http://turkmenistan.usembassy.gov/dual\\_citizens.html](http://turkmenistan.usembassy.gov/dual_citizens.html) [accessed 8 August 2016]

opposite approach, Ukraine does not recognize the legal consequences of dual citizenship, but at the same time, does not forbid it (Poiedynok 2015). In this direction, Ukrainian dual citizens are not required to relinquish a second citizenship (Poiedynok 2015). According to this second approach, the legal procedure for the obligatory deprivation of Ukraine's citizenship for the voluntary acquisition of a foreign citizenship is non-existent and thus, has no practical ground (Poiedynok 2015). Hence, overall, the principle of single citizenship in Ukraine's law cannot be interpreted as equal to the prohibition of dual citizenship, but instead, solely the non-recognition of legal consequences of foreign citizenships (Poiedynok 2015). Moreover, minimal state controls on emigrants so far gave way to a high number of dual citizens from Ukraine (Blatter et al. 2009, 23). Overall, the lack of a uniform approach concerning dual citizenship in Ukraine appears to create disadvantages for dual citizens who often face the state officials' negative attitudes stemming from their wish to punish Ukrainian dual citizens without any legal grounds (Poiedynok 2015).

Beneath Ukraine's general opposition to the principle of dual citizenship lies a political matter, stemming from concerns over the possible negative consequences of dual citizenship in particular with Russia (Shevel 2013). Furthermore, the issue seems to have additionally acquired a domestic political dimension and has been used in electoral competition (Shevel 2013). To illustrate, in 2012, some candidates were barred from running the elections due to their alleged possession of another citizenship (Shevel 2013). In line with this, the numerous draft laws on the dual citizenship issue point to two opposite perspectives in Ukraine (Poiedynok 2015). In the first perspective, which is state and security oriented, the aim is to prevent the cases of dual citizenship (Poiedynok 2015). The introduction of the duty to report voluntary acquisition of a foreign citizenship along with an administrative or criminal punishment in unreported cases together with a ban against dual citizens' employment as public servants accompany this negative stance towards dual citizenship (Poiedynok 2015). In the second perspective, which is more individual-oriented, dual citizenship is regarded as part of an objective reality in linkage to Ukraine's position as an emigration country (Poiedynok 2015). Still, based on the official legislation, Ukraine can be considered among the countries that do not tolerate dual citizenship.

## Uzbekistan

Uzbekistan determines citizenship mostly based on the *jus sanguinis* principle according to its Citizenship Law in force since 1992 (UNHCR Uzbekistan). In relation to dual citizenship, *Article 10* of this law declares, “a person, who is a citizen of the Republic of Uzbekistan cannot be recognized as a citizen of a foreign State” (UNHCR Uzbekistan). According to consular information provided for the citizens of Uzbekistan living abroad, following the choice of a foreign citizenship acquisition, Uzbek citizens should contact a consulate in the host country with a written statement of withdrawal of citizenship and pay the consular fees required to renounce citizenship<sup>13</sup>. However, the renunciation of citizenship requires the collection of numerous documents and hence, the process often comes down to individuals paying bribes to expedite the process (OHCHR Uzbekistan). The failure to undergo this process of renunciation of Uzbek citizenship may pave the way for the risk of prosecution upon return to Uzbekistan for violating the passport regime and unlawfully acquiring a foreign citizenship (European Parliament 2009). Due to this official legislation against dual citizenship, Uzbekistan is considered among the countries that strictly ban dual citizenship (Sejersen 2008, 532).

Two critical issues, dual citizenship with Russia and the unclear status of Crimean Tatars stand out in linkage to dual citizenship in the case of Uzbekistan. First and foremost, Uzbekistan offered citizenship to all permanent residents of Uzbekistan at the time of independence. However, the ban on dual citizenship led to the emigration of Russian speakers because many still considered themselves to have permanent ties to Russia and were reluctant to elect Uzbekistan as their sole citizenship. As a result of their right to acquire Russian citizenship, the Russian speaking population shrank in Uzbekistan (Shevel 2013). To bypass Uzbekistan’s ban on dual citizenship, some in this community are reported to initially secure Russian citizenship on their old passport and then report the loss of their passport to the interior administration in Uzbekistan in order to get a new passport with Uzbek residence registration (Warikoo 2005).

Another issue directly linked with Uzbekistan’s ban on dual citizenship is the uncertain status of Crimean Tatars in Uzbekistan (Ablyatifov 2009). In particular, Crimean Tatars who left for Ukraine after 1991 faced problems in renouncing Uzbekistan citizenship

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<sup>13</sup> Consular services: What further actions should Uzbek citizens take after receiving foreign citizenship?  
<https://my.gov.uz/en/faq/55> [accessed 10 August 2016]

and acquiring citizenship in Ukraine (Ablyatifov 2009). Here, a major challenge facing Crimean Tatars who wanted to renounce their Uzbek citizenship was the high consular fee established by Uzbekistan (Ablyatifov 2009). As the average monthly wage of a Ukrainian citizen amounted to less than the US \$100 consular fee, it was unimaginable for an average repatriate-Crimean Tatar who was usually unemployed to pay this sum (Ablyatifov 2009). Overall, due to its official legislation against dual citizenship, Uzbekistan is considered among the countries that strictly ban dual citizenship (Sejersen 2008, 532).

Based on the results of this research on the dual citizenship legislations, one could conclude that, officially, out of the 11 major sending countries of migrants in Turkey, five states ban dual citizenship, four states partially tolerate dual citizenship and two states allow dual citizenship. Against this background, this research will build on this data through in-depth interviews with state officials from sending countries to shed light on the officials' interpretations of the existing laws and dual citizenship practices.

## **2. 4 Background information on migrants**

This section introduces the migrants involved in this study through their migration stories, practices and reflections on settlement in Turkey and opinions on the value of citizenships. In the “migrant-side” of this study, the most practical and clear categorization for migrant profiles is based on their reasons to migrate to Turkey, namely, employment, education, security and marriage. Following the analysis of reasons of migration, this section will concentrate on migrants' modes of entry, their acquisition of residence and work permits and finally, opinions on the value of citizenships across the globe. This background information on migration stories helps to uncover the setting in which dual citizenship activities take place and perceptions are shaped.

### *Reasons of migration*

In the first category, among the 72 migrants involved in this study, 31 migrants have arrived in Turkey for reasons of employment. More specifically, five Azeris, five Georgian nationals, four Iranian nationals, two Russians, six Turkmen, four Crimean Tatars from Ukraine and five Uzbeks make up the labor migrant category. As only nine people in this group are male, the labor migrant category is highly feminized. Moreover, two Azeri migrants out of five (*Kabuter, Aydan*), all Turkmen migrants (*Aygiin, Çemen, Ece, Nurana,*

*Gonca, Maksat*), all Crimean Tatars from Ukraine (*Gülşen, Nermin, Cevriye, Zahreh*), two Uzbek migrants out of five (*Dürdane, Gülbahar*) and Georgian female migrants (*Seyli, Manana, Lamzo*), except one who does trade between Georgia and Turkey (*Lale*), are employed in the domestic sector. Those involved in other sectors are three Azeri migrants involved in media related work (*Arzu, Soltan, Salifov*), a Georgian national who owns a bus company carrying passengers between Istanbul and Tbilisi (*Temo*), four Iranian nationals- two female migrants organizing Istanbul tours for Iranians (*Nigar, Şermin*), a chef in an Iranian restaurant located in Fatih (*Celil*), a professional singer (*Ramin*) and finally, three Uzbek migrants employed in restaurants as waiters (*Aybek, Fuat, Murad*). Two Russian migrants in this category *Alex* and *Natalie* work as legal advisor and financial counselor respectively.

In the labor migrant category, concerning the duration of migrants' residence in Istanbul, the entrance years to Turkey vary between 1996 and 2013. Here, two migrants, a trader (*Lale*) and a bus company owner (*Temo*) of Georgian nationality frequently travel to their home country for business. In terms of long term life plans, the only migrants who consider returning to their home country in the future are Ukrainians (*Gülşen, Nermin, Cevriye, Zahreh*) and some Uzbek nationals (*Aybek, Fuat, Murad*). Here, despite the long years they spend in Turkey, both Ukrainian and Uzbek migrants' main aim is to earn money enough to continue their lives without the need for employment in their home country.

With regards to labor migrants' legal status in this category, all the Crimean Tatars from Ukraine entered Turkey as tourists, received yearly residence permits and hold no work permits for their employment in Turkey. Most of the Georgian migrants (*Seyli, Temo, Lale*) entered as tourists and renewed their tourist visas by re-entering Turkey when necessary without ever applying for residence permits. The remaining Georgian migrants (*Manana, Lamzo*), likewise, entered as tourists but received work permits through their employers who are publicly known business figures. Iranian migrants in the labor migrant category also display a heterogeneous profile concerning their legal status even though they all entered Turkey through tourist visas. While *Nigar* holds a tourist visa, which she renews by going back and forth between Istanbul and Tehran, *Ramin* and *Şermin* hold residence permits and will soon apply for citizenship, once they fulfill the three-year criteria as both are married to Turkish citizens. Finally, among the Iranian migrants, *Celil* has Turkish citizenship, which he received after staying in Turkey for five years.

To continue, all Turkmen, Uzbek, Azeri and Russian labor migrants entered Turkey with tourist visas despite their plans for employment in Turkey. Among the Azeri migrants, one female migrant later received residence permit through marriage (*Aydan*), one received work permit (*Soltan*), one received regular residence permit (*Salifov*) and finally, two Azeris received citizenship through marriage (*Kabuter, Arzu*). Among the five Turkmen, three received citizenship through marriage (*Aygün, Çemen, Ece*) while two migrants later applied for residence permits (*Nurana, Gonca*). Among the five Uzbek migrants involved in this study, four entered Turkey as tourists and are now on residence permits with the aim of employment (*Aybek, Fuad, Murat, Gülbahar*) and one has started her citizenship application process after marrying a Turkish citizen (*Dürdane*). *Alex* and *Natalie*, the two Russian migrants who came to Turkey for employment, both hold residence permits. Thus, the labor migrants involved in this study present a rich variety concerning their migration history and legal status.

In the second category, 21 migrants entered Turkey for reasons linked to security and protection. With only one Syrian and four Iraqi male migrants, the migrant category of those who seek protection in Turkey is a highly feminized group. In the Syrian group, ten Syrian Arabs (*Büşra, Nuseybe, Bedia, Heysem, Emine, Döne, Amine, Muna, Ranim, Lina*) and two Syrian nationals with Turkmen ethnicity (*Süheyla, Gisah*) entered Turkey between 2012 and 2015 and hold temporary identity cards reserved for Syrian migrants after the beginning of the Syrian conflict. While they still face major challenges concerning their lives in Turkey, most of the Syrian migrants have settled in Turkey permanently. In the Iraqi group, all the seven migrants have Turkmen ethnicity and left Iraq due to, as they explain, the attacks targeting Turkmens (*Ömer, Selda, Şahin, Sara, Kenan, Gönül, Diyar*). Entrance years of most Iraqi Turkmen migrants vary between 2000 and 2009. While two Iraqi Turkmens (*Ömer, Selda*) hold residence permits, the rest of Iraqi Turkmens hold Turkish citizenship. The only Iranian nationals in this category of protection are two female migrants, an Assyrian who fled Iran due to persecution based on religion (*Katrin*) and a Persian who left Iran due to heavy religious conservatism (*Menekşe*) both of whom later received Turkish citizenship through marriage with Turkish citizens. Similar to the Syrian migrants, Iraqi and Iranian nationals in this category have permanently settled in Turkey.

The third category of migrants involved in this study constitutes of ten migrants who came to Turkey for education between the years 2004 and 2014. Among the seven ethnically Turkish Bulgarian migrants and three Iranian nationals one of whom has Azeri ethnicity,

three are women. In the group of ethnically Turkish migrants from Bulgaria in this category, two migrants (*Reyhan, Ersin*) hold residence permits based on education as they are still students. While two other migrants (*Ayten, Sabri*) received yearly residence permits upon their graduation from Turkish universities, the three remaining migrants in the group of Turkish migrants from Bulgaria (*Asım, Ahmet, Hüseyin*) received Turkish citizenship through the fast citizenship regulations of 2011 specifically for Turkish migrants from Bulgaria when they were still students. Finally, all the Iranian migrants in the education category (*Mona, Sevinç, Mete*) are still on residence permits based on education, as they are still university students. Concerning future plans, all migrants in this category of students hope to settle in Turkey permanently.

In the fourth category, ten migrants settled in Turkey solely due to their marriage with a Turkish citizen. Five Russian nationals (*Aleika, Nadia, Anfisah, Irina, Lidia*), four German nationals (*Iris, Inge, Henrik, Jonas*) and one Azeri migrant (*Inare*) make up this category of migration linked to marriage. As this is a female dominant category, only two male migrants (*Henrik, Jonas*) migrated to Turkey based on the reason of marriage with a Turkish national. Moreover, it should be underlined here that numbers rise when migrants who later married with a Turkish citizen and received residence permits or applied for citizenship in Turkey based on marriage are also included in this category. More specifically, eight migrants, consisting of those from Iran (*Şermin, Ramin*), Bulgaria (*Ayten*), Azerbaijan (*Inare, Aydan*), Turkmenistan (*Maksat*), Uzbekistan (*Dürdane*) and Germany (*Henrik*) have settled based on residence permits through marriage. In addition, two migrants from Iran (*Katrin, Menekşe*), two migrants from Azerbaijan (*Kabuter, Arzu*) and three migrants from Turkmenistan (*Aygün, Çemen, Ece*) received citizenship through marriage with a Turkish citizen. Hence, the fact that this category consists of only three male migrants (*Henrik, Jonas, Ramin*), demonstrates that marriage with Turkish nationals is a route of settlement in Turkey predominantly for female migrants.

#### *Modes of entry and settlement*

*“Migration to Turkey is full of uncertainties. The residence process, the citizenship process are all long and complex bureaucratic processes with many unknowns. But once you enter Turkey and start living here, everything settles in time” (Reyhan, male, 26, Turk from Bulgaria)*

Reasons of migration such as labor, marriage, security and education and migrants' modes of entry to Turkey are often related. Most of the labor migrants in this study entered



Turkey with tourist visas. When their tourist visas expired, the great majority of these migrants applied for residence permits even though very few (four migrants in total) continued to remain in Turkey irregularly. While the majority received residence permits, less than a handful of labor migrants from these nationalities received work permits. Similar to labor migrants, those who settled in Turkey for marriage with a Turkish national all entered with tourist visas and received residence permits based on their marriage.

In spite of the weight of tourist visas in terms of entrance to Turkey in the labor and marriage categories, in the education category, all students entered the country through student visas and easily renewed their visas yearly on written proof that their education continued.

To continue with the modes of entry in linkage to reasons of migration, in the case of migrants who enter Turkey for reasons of security and protection, Iraqi Turkmens who entered Turkey in the 1990s needed no legal documents due to war conditions. Since then, however, they mostly enter with a tourist visa, which Iraqi migrants describe as difficult to receive from the Turkish Consulate in Iraq. Similar to the case of Iraqi Turkmens in the 1990s, Syrian migrants entered Turkey recently without a legal status due to the war in Syria.

Overall, in terms of mode of entry to Turkey, while labor and education are among the most primary reasons behind settlement in Turkey, the legal entry status does not always coincide with the mode of settlement. To illustrate, tourist visas, temporary by nature, are employed as a route to permanent settlement and employment in Turkey. Likewise, student visas, designed only for a limited time period for educational purposes, do not correspond to students' widespread interest to reside in Turkey permanently, which appears as a significant reason behind choosing Turkey for education. Against this background on migrants' reasons and routes for migration to Turkey, migrants' experiences and opinions concerning regular settlement into Turkey are introduced below.

#### *Residence and work permits*

*“Residence permits depend on money and can be received by the economically well of migrants but work permits are almost impossible regardless of financial status.”  
(Natalie, female, 36, Russia)*

Migrant practices and reflections on the acquisition of residence and work permits in Turkey vary depending on nationality, migrant category and the application year. Overall, migrants generally accept that residence permits are easy to receive due to a simple

bureaucratic process. Work permits, however, are “*out of migrants’ reach*” (Natalie, female, 36, Russia).

To begin with residence permits, in addition to the common idea that residence permits are easy to receive in Turkey, the general opinion is that the yearly renewal of the residence permit is simple if a migrant is not having economic difficulties. At this point, most migrants believe that financial wealth is the key to the acquisition of a residence permit. Secondly, the institutional transfer from the *Foreigners’ Police* to the *Directorate General of Migration Management* raises eyebrows among migrants who emphasize the difficulty of residence permit renewal due to the technical hardships of receiving online appointments from this institution. To illustrate the length of this process, a Russian migrant settled permanently in Turkey indicates that following the expiry of her residence permit in November, she was able to receive the soonest appointment in April, making her “*sick and tired of residence permit bureaucracy which forces her to apply for Turkey citizenship solely for this reason*” (Irina, female, 51, Russia).

Concerning the types of residence permits, marriage with a Turkish citizen is perceived to significantly facilitate the acquisition of long-term residence permits. Here, one migrant points out based on her experience of marriage with a Turkish citizen that the state determines a migrant’s length of residence permit based on the Turkish spouse’s monthly salary (Ayten, 31, Turkish migrant from Bulgaria). Accordingly, in cases where a citizen proves to have a high monthly salary, the migrant spouse receives a three-year residence permit. In other cases, the residence permit is limited to two years. This information on the influence of a Turkish citizen’s monthly salary on a migrant’s residence permit, however, was found neither in legal documents nor in the statements by state officials.

In the case of migrants who entered Turkey for higher education, all students express fear and pessimism concerning the acquisition of residence permits after graduation with the belief that permanent residence in Turkey is difficult for non-students. At this point, some highlight that the education they receive in Turkey, such as city planning or construction engineering, is designed based on the needs of the employment market in Turkey and will be of no value in their origin country. Thus, the inability to receive a residence permit upon graduation and the obligation to return home are major sources of anxiety among migrant students.

Next to labor, marriage and education, migrants who entered Turkey for protection have distinct experiences concerning regular settlement. To illustrate, Iraqi Turkmens who entered Turkey in the 1990s due to the insecurity in Iraq received residence permits in the time of Iraqi national elections during which Turkey, based on migrant accounts, distributed residence permits to allow their external electoral participation. As for the second category of nationality in this group, Syrian migrants' residence in Turkey is based on temporary identity cards that allow free health services and unlike residence permits, are received for free. Here, several Syrian migrants point out that the acquisition of temporary identity cards is becoming increasingly difficult.

Considering the heavy weight of Syrian migrants in the migrant population, a few words should be added on their experiences of settlement. Based on migrant accounts, the first comers from Syria were immediately provided with regular residence permits. Later on, however, they were unable to renew these residence permits and instead, were given temporary identity cards. Moreover, the latecomers of the last three years were obliged to wait for long periods with an average of nine months due to the increasing number of Syrian migrants and the state's more strict approach towards Syrian nationals. In line with this, the requirements to receive temporary identity cards also increased in time. Despite that no official documents were required to receive temporary identity cards in the past, those who arrived in the last few years describe the hardship of collecting legal documents including a marriage certificate, family registration (as proof for family unity) to be received from the authorities in Syria and a rent contract in Turkey.

In spite of these difficulties, according to the great majority of Syrian nationals, temporary identity cards constitute an advantaged migrant status in Turkey compared to residence permits because they are received for free and they allow free health services including doctor visits and prescribed medicine. Moreover, temporary identity cards allow a pocket money of approximately 250 Turkish Liras from the governor offices once in three months. Still, most Syrian migrants underline the insufficiency of state services, especially concerning the challenges faced in the areas of housing, employment and schooling. This opinion is accompanied by experiences of maltreatment in formal state institutions ranging from governorships to hospitals. Finally, because the validity period of their identity cards is unknown, many migrants from Syria state they do not feel permanently accepted to Turkey.

While all migrants involved in this study have some opinion on the residence permits acquisition process in Turkey, they have less experiences and more vague opinions in

relation to work permits. The work permit process is often not perceived to be inclusive, clear or accessible. A frequent remark on work permits is that they depend on first, a company's willingness to manage the bureaucratic burden of employing a foreigner and second, its taxation record. Based on migrant accounts, the bureaucratic process for work permits functions as a barrier to employ migrants who are then either unable to perform their occupation and are forced to work in entry-level jobs or work irregularly.

With regards to work permits in this context, labor migrants involved in this study who enter Turkey with tourist visas generally consider two routes when their tourist visas expire. In the first route, several migrants employed in the domestic care sector continued to stay and work on irregular terms. In this group of migrants, a residence permit that is required to legalize a migrant's stay in Turkey is deemed as an unnecessary document and an avoidable expense. In the second and more frequently taken route, migrants preferred to acquire yearly residence permits that legalized their stay in Turkey albeit with no work permits that legalized their employment. In both routes, the perception that work permit acquisition is challenging and that only professional companies can acquire work permits for their employees generally draw migrants away from the work permit process.

### *Value of citizenships*

*"I do not like the concept of citizenship. These concepts constrain humans. Someone born in Europe is higher in value than someone born in Asia or Middle East. This is so unfair to humanity. Obviously passports are connected to the issue of security, but it is still unfair." (Mete, male, 25, Afghan Iranian dual citizen)*

The study of dual citizenship requires the assessment of migrants' opinions on the value of citizenships. Among the participants of this research, while 22 migrants among the 72 migrants already hold Turkish citizenship and ten migrants are at various stages of their citizenship application, the great majority of non-citizens also demonstrate high interest in Turkish citizenship. However, interestingly, the most critical point raised by the majority of migrants is that an individual's dual citizenship, by itself, is not an asset. In other words, holding more than one citizenship may only be of value in relation to the specific countries of citizenship. As one Afghan migrant with Iranian citizenship pointed out, the benefits of dual or multiple citizenship will depend on the "*quality of citizenships and not the quantity*" (Mete, male, 25, Afghan Iranian dual citizen). Concerning the quality, holding dual citizenship is advantageous only if one holds "a good citizenship".

A “good citizenship”, based on the findings of this study, is determined by the chances of international mobility a passport provides, the economic and security situation in a country, provision of newcomer services by the state, the international prestige attached to it, the presence of ethnic ties with that country and finally, the practical advantages offered by a specific citizenship. Overall, even though most migrants regard Turkish citizenship as a generally better citizenship than their original, Turkish citizenship is still perceived as of average value in the world in comparison to Western citizenships.

In this context, to begin with, migrants emphasize international mobility as the key attribute of citizenships. Hence, Turkish citizenship is perceived to be more valuable than Azeri, Iraqi, Iranian, Turkmen and Uzbek citizenships as Turkish citizens are more likely to receive Schengen visas and able to travel visa free to many countries. Migrants from Bulgaria, Germany and Russia, however, find their own citizenship to be more valuable in comparison to Turkish citizenship in terms of international mobility. In comparison to Bulgarian citizenship, one migrant emphasizes that Bulgaria is an “*open country*” while Turkey is “*closed to the world*” (Aytan, female, 31, Turk from Bulgaria).

To continue, the economic situation in a country is also a determinant factor in the ranking of citizenships. To illustrate, due to high unemployment in Georgia, Georgian citizenship is perceived to be less valuable than Turkish citizenship (Temo, male, 29, Georgia). Likewise, Bulgarian citizens emphasize the weak Bulgarian economy that makes Turkish citizenship more valuable than Bulgarian. Finally, in terms of security, both Iraqi and Syrian migrants consider Turkish citizenship as more valuable than their own citizenships because Turkey is more secure than their origin countries.

When asked the best citizenships across the globe, most migrants give priority to European citizenships, namely of Germany, Italy, Spain, Switzerland, Denmark and Sweden as the best citizenships. Other valuable citizenships are of the United States, Australia and New Zealand. Here, the determinant factor is not only state services for migrants in the areas of housing, employment and health, but also international prestige. An Iraqi Turkmen points out that in the airport, a “*US citizen stands out as a more privileged person compared to Middle Easterners*” (Gönül, female, 30, Iraqi Turkish dual citizen). Interestingly, an Afghan migrant expresses opinion that “*a strong passport, such as British passport, is not only advantageous in international travel, but also in home countries such as Afghanistan where a migrant could work for higher wages as a British citizen*” (Mete, male, 25, Afghan Iranian

*dual citizen*). This thinking demonstrates that holding a “valuable” passport may also be of some value in the home country.

For migrants with Turkish ethnicity such as Iraqi Turkmens, ethnically Turkish Bulgarians and Iranian Azeris, however, the key component of the value of Turkish citizenship is based on their ethnic ties. Here, Turkmens perceive Turkey as their homeland and Azeri migrants consider Turkey as a country of their own nationality. Hence, migrants’ feeling of belonging and loyalty come to light in relation to their ethnicity.

Finally, some migrants are of the opinion that Turkish citizenship is a critical requirement to live in Turkey permanently solely for practical reasons. To illustrate, German and Russian migrants tend to perceive their original citizenship as generally more powerful and advantageous in comparison to Turkish citizenship, however, still admit that residence and employment in Turkey are easier with Turkish citizenship.

Overall, this background on migration and settlement stories and opinions on the value of citizenships reveals the context in which migrant opinions on dual citizenship are shaped. Accordingly, Turkish citizenship, despite its average value among the citizenships of the world, may be of migrants’ interest due to practical or emotional reasons. Dual citizenship, however, is not particularly of interest to most migrants because it is not considered an advantaged legal status.

## **2.5 Limitations of the research**

Several limitations were experienced in the empirical research. These limitations can be categorized under four titles of challenges with regards to reaching state officials from the host and sending states, data availability, composition of migrants and finally, constraints in setting. To begin with the Turkish state officials, primarily, as this study finds out, all Citizenship Committee members in the provinces have permanent seats in the Committee with only one back-up officer from each state office. However, due to the reluctance of some officers and possibly, the unwillingness of their institutions to provide the necessary information, the two permanent Committee members from the *Smuggling and Organized Crime Units* within the *Gendarmerie General Command* and the *Provincial Directorate of Family and Social Policies* were not reached.

Secondly, the *Deputy Governor* of Istanbul who, as part of his routine duties, leads the Citizenship interview and is present during each migrant’s interview refused to be

interviewed “*due to the sensitivity of the issue*”. In spite of the formal application with a letter from the *Koç University*, no response was received from the *Deputy Governorship*.

The final shortcoming of the empirical study with the Turkish state officials is that despite the researcher’s will to interview the *Head Officers of the Directorates of Citizenship Procurement Office, Re-obtaining Citizenship and Immigration Procedures and Citizenship Investigation and Evaluation Branch Directorate*, following the one and a half hour interview with the *Head of the General Directorate of Population and Citizenship Affairs* in Ankara because this officer did not see any need for the researcher to meet with these three officers.

With regards to the sending states in this empirical study, four limitations come into light. The first shortcoming of this data is the lack of statistics on the origin countries of citizenship applicants in Turkey. This insufficiency was solved by merging the existing data on the origin countries of international migrants who hold legal residence permits in Turkey with the origin countries of foreign residents in Turkey. Hence, the current list of origin countries includes both non-citizens and foreign nationals who received citizenship.

The second shortage of data appears in relation to the search for migrants for in-depth interviews as part of the empirical study. Despite their high presence in Turkey based on the existing data, no permanent migrants from Afghanistan, Libya and Macedonia were reached and hence, these three sending countries were omitted from the research. Thus, the major sending countries involved in this study became Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine and finally, Uzbekistan.

The third shortcoming of the empirical study in relation to sending states is that the Consulates of Azerbaijan and Syria refrained from having interviews despite the already finished empirical study on migrants with these nationalities. Hence, the research on these two countries’ approaches towards dual citizenship remains limited to desktop research.

The final shortcoming of this research in relation to sending states is the lack of a general sending state typology that categorizes dual citizenship perspectives based on each citizenship profile with a full command of the eleven sending countries’ citizenship characters. Because of the difficulty in drawing such general categorical conclusions, this research classifies sending states solely based on their current perspectives of dual citizenship and several citizenship rights and duties without linking these outcomes to the nature of citizenship in those countries.

Concerning the empirical research on migrants, three shortcomings come into light with regards to, first, the dominant weight of female participants and second, the unequal distribution of migrant nationalities. Concerning the first shortcoming, the practical fact that most male migrants are employed during day hours restricted both their reachability and also interest in having an interview. Despite this dominant weight of female participants in the field study, a major shortcoming in this research is the inadequacy of gender related issues and gender representation. This does not necessarily imply that gender is not a significant element in citizenship processes in Turkey. Specifically, only one participant explained in detail the disadvantages of being a female migrant in Turkey (*Ayten, female, 31, Turk from Bulgaria*). In light of this case, one can speculate that the lack of other findings on gender indicates that women involved in this research take the impacts of gender as given, assume them to be normal and expected.

With regards to the second point, despite the aim to reach an equal number of migrants from each nationality, the number of participants in this study range between four to twelve migrants for each nationality. This unequal distribution is rooted in the fact that despite that many migrants were reached from all of the eleven nationalities, some migrant communities were more open to communication with a researcher compared to some others. To illustrate, on the one hand, most German nationals could not allocate time for an interview, Georgian migrants did not see the point of an interview on their personal experiences and Uzbek migrants often felt insecure to disclose information on their migration and citizenship experiences. On the other hand, migrants from Syria were generally more willing and used to share information on their experiences possibly due to their daily communication with the Turkish nationals volunteering at the local solidarity organization. Hence, both shortcomings in the empirical research on migrants reflect the migration realities in Turkey.

In linkage to this, another identity-related shortcoming in this research is the insufficient representation of non-Muslim participants in the study. This is due to a dominant weight of participants from Muslim countries as a result of the migration trends in Turkey. Overall, the migrant view in this research is that religion plays no role in citizenship processes and that a migrant's Muslim faith does not facilitate citizenship or dual citizenship in Turkey. However, this finding appears to be in contrast with the literature on Turkish citizenship and may not be accurate for two reasons. First, the migrant cases involved in this research are non-representative and they may not offer sufficient data to draw general



conclusions. The second reason is the possibility that the few migrants with other faiths included in this study may already assume it normal that being Muslim has its advantages in Turkey. Hence, more interviews with non-Muslim migrants with a more direct focus on the factor of religion may shed light on the impacts of religious identity on citizenship processes.

The last limitation of the empirical study with international migrants regards the research setting of Istanbul where the empirical research took place. Due to practical reasons, no interviews were made with migrants who reside outside of Istanbul. While this geographical concentration could be considered a drawback of the research, Istanbul's position as a migration hub contributed to the variety of migrants who participated in this research. Hence, the diversification of migrant profiles and migration patterns is an outcome of the choice of research setting, which may not necessarily act as a limitation.

Finally, it should be noted that with the ever-increasing immigration flows to Turkey and consequently, the efforts to institutionalize the management of migration, the migration scene is in a rapid change. In this fast changing environment, the presence of increasing numbers of migrants, especially those with no Turkish ethnicity who settle in Turkey permanently, may break the settled perspectives considering foreign nationals' citizenship acquisition in Turkey and their dual citizenship. Thus, the conclusions reached in this specific time frame may soon need an update, especially concerning the host state officials.

## CHAPTER 3

### Revisiting the dual citizenship literature

Increasing international migration across the globe forces the modification of the traditional understanding of citizenship defined as a bounded population holding a specific set of rights and duties and which excludes others on the basis of nationality (Odmalm 2005). Consequently, dual citizenship and its impacts on the notion of single and exclusive citizenship give rise to debates concerning the transformation of citizenship and remain central in studies focusing on various dimensions of this institution (Blatter et al. 2009; Faist and Gerdes 2008). The contents of dual citizenship debates, however, often lack clear-cut borders that allow precise distinctions because most elements concerning citizenship dimensions are inextricably interwoven.

Taking this complexity into consideration, this chapter aims to revisit the literature by offering an overview of the focal points in the existing studies and introducing the central questions concerning dual citizenship. The task of identifying and outlining the various standpoints in the fundamental concerns regarding dual citizenship can be done in numerous ways. In line with the aim of this research, two groups of literature appear to be particularly important for understanding dual citizenship. These clusters represent scholarly work focusing on first, citizenship rights and duties and second, matters related to integration from the angles of activity and identity. Hence, this chapter will first outline the points where discussions arise, second, identify the literature on the perspectives of sending states, host states and migrants and finally, assess the discussions in detail based on citizenship dimensions.

In the first category of citizenship as status, dual citizenship studies concentrate on this institution as a legal status with arguments surrounding the complexities stemming from migrants' obligations and rights in several countries. These include challenges in the determination of applicable law in matters involving dual citizens, military service and taxation requirements, the right of access to diplomatic protection and finally, political participation in the form of dual voting (Bauböck 1995; 2005; Bowden 2003; Faist 2001; Hansen and Weil 2002; Jones-Correa 2001; Legomsky 2003; Martin and Hailbronner 2003; Vonk 2012).

Another body of dual citizenship literature that concerns the formal status dimension regards the expansion of dual citizenship and the existing global patterns of tolerance of dual citizenship (Bauböck 2010; Blatter 2008; Blatter et al. 2009; Dahlin and Hironaka 2008; Faist and Kivisto 2007; Sejersen 2008). The assessment and comparison of policy trends in receiving states constitute significant components of research in this field (Faist 2007; Faist et al. 2007; Gustafson 2002; Howard 2005; Ludvig 2000; Østergaard-Nielsen 2008).

The next subject matter that draws attention with regards to citizenship as status is the impact of dual citizenship on states. As dual citizenship unsettles the notion of traditional state sovereignty, several works approach the complexities of overlapping membership with respect to state sovereignty through an emphasis on citizenship as formal status (Joppke 1998; Pogonyi 2011; Sassen 1996; Stasiulis and Ross 2006; Triadafilopoulos 2007). Accordingly, growing dual citizenship may indicate a modified version of the known world order of state sovereignty (Pogonyi 2011, 691). In contrast to the idea that dual citizenship signals the weakening of state sovereignty, growing tolerance of dual citizenship may instead be a state tool to increase sovereignty (Stasiulis and Ross 2006, 334). From this viewpoint, against the complexities of citizenship as formal status in the cases of dual citizenship, sending states' promotions of national interest through expatriates abroad and receiving states' policies of migrant integration increase their sovereignty through the tolerance of dual citizenship (Joppke 1998, 27; Spiro 1994, 97).

The last category of dual citizenship studies on formal citizenship concentrate on the aspect of rights. In this category, studies assessing citizenship rights revolve around the question whether dual citizens are unjustly advantaged in comparison to mono-citizens because they hold more rights through their multiple memberships (Mazzolari 2009). Here, the view that regards citizenship solely in the framework of individual or state interest is often criticized. From this line of debate, rather than judging the dual citizenship status based on individual or state interest, embracing the rights approach adds a new dimension that is generally ignored or overshadowed by the literature emphasizing on the frame of interest. Hence, in linkage with the debates on citizenship rights, several scholars examine this institution within civil society debates and emphasize the extent to which individual rights rest on universal human rights before citizenship rights (Jacobson 2001; Soysal 1994; Spiro 2010). Consequently, in the context of increasing international migration and the altering role of nation state (Sassen 2002), the changing nature of citizenship has been described as

transnational (Bauböck 1995; Bauböck 2003), flexible (Ong 1999; Studemeyer 2015) and post-national (Soysal 1994).

Next to citizenship as formal status, the second body of literature on dual citizenship concerns integration. With regards to the matters of migrant integration, existing research emphasizes mostly on migrants' participation in receiving states (Brown 2002; Guild et al. 2009; Hammar 1990; Penninx 2004) and seldom, on the role of origin countries (Gidley and Caputo 2013; Østergaard-Nielsen 2003; Vink 2013). Dual citizenship discussions in relation to migrant receiving states generally revolve around policies to achieve immigrants' full integration in the receiving society with the worries that non-EU migrants will endanger the nation's integrity and homogeneity (Faist 2007; Faist and Gerdes 2008, 12; Østergaard-Nielsen 2008, 4). Generally, within the dual citizenship literature on integration, immigrants' political participation and the political implications of this institution receive the most attention (Bloemraad 2004; Castles and Davidson 2000; Cordero-Guzmán et al. 2001; Escobar 2004; Faist 2001; Faist et al. 2004; Jones-Correa 2001).

In linkage with migrants' political participation, an important body of literature emphasizes the impacts of dual citizenship on the functioning of democracies framed within the theories of democracy with the core question of how to adapt the systems of democratic representation to the expanded territories of dual citizenship (Betts 2002; Blatter 2008; Blatter et al. 2009; Hammar 1985; Østergaard-Nielsen 2008, 6). Next, receiving less attention than the states' viewpoint, political participation is also studied from the migrant perspective (Cain and Doherty 2006; Escobar 2004; Guarnizo 2001; Staton et al. 2007). Against this background, the key question is whether dual citizenship validates and extends democratic principles or violates the norms of democratic equality by enfranchising non-resident citizens (Pogonyi 2011, 687).

To continue, migrant integration is also studied in relation to the concept of belonging, especially with regards to migrants' belonging in the host countries (Aleinikoff and Klusmeyer 2001; Bauböck et al. 2007; Bloemraad 2004; Castles and Davidson 2000; Conway et al. 2008; Gustafson 2002; Gustafson 2005; Preston et al. 2007). Particular identities have also received attention in terms of integration related matters (Cordero-Guzmán et al. 2001; Jakobson and Kalev 2013).

Against this overview of dual citizenship studies, this research adopts Kymlicka and Norman's (2000) citizenship dimensions as the foundational structure in the assessment of

how dual citizenship functions and transforms the traditional institution of citizenship in a triadic relationship setting of migrant sending states, receiving states and international migrants. According to Kymlicka and Norman (2000), the institution of citizenship involves three dimensions which may be formalized as (1) legal membership in a political community with basic individual rights and hence, legal status, defined by a discourse of the legal rights and duties that operate between citizens and state, (2) activity or virtue, necessitating the ability to trust, the willingness to participate and engage productively in civic life and finally, (3) identity, as membership to one or more political communities (Carens 2000, 166; Kymlicka and Norman 2000).

Through the lens of these three citizenship dimensions, two central questions surface in the dual citizenship literature: the impacts of dual citizenship on, first, the formal status of citizenship including citizenship rights and duties and second, the impacts of dual citizenship on the dimensions of activity and identity in relation to integration. In the first central theme, debates revolve around whether dual citizenship leads to a paralysis of formal citizenship due to complexities of overlapping membership. In the second, the main question is whether dual citizenship hinders or facilitates integration through the dimensions of activity and identity. In point of fact, these questions have the tendency to reduce the complexity and multiplicity of the dual citizenship institution due to the assumption that dual citizenship functions homogeneously and independent of context in a world where all rights and duties are uniform. Still, despite their reductionist nature, these questions around which dual citizenship debates revolve, serve as tools to broaden and elaborate the analysis of dual citizenship.

Following this overview on the debates of dual citizenship that mostly revolve around formal citizenship and integration and the introduction of Kymlicka and Norman's citizenship dimensions, this chapter will now assess the dual citizenship literature in terms of actors of international migration and Kymlicka and Norman's (2000) citizenship dimensions in line with the focus of this study. Hence, this section will re-distinguish the major dual citizenship questions from the positions of sending states, receiving states and migrants in accordance with the dimensions of status, activity and identity. Overall, the lion's share of the dual citizenship literature concerns the consequences of dual citizenship for the residence country (e.g. Cain and Doherty 2006; Mügge 2012a; Schlenker 2015; Staton et al. 2007).

To start with the literature on receiving states and citizenship as status, much of the literature concerns the patterns of dual citizenship tolerance in receiving states (e.g. Faist

2007; Faist et al. 2007; Gustafson 2002; Howard 2005; Ludvig 2000; Østergaard-Nielsen 2008). Next, migrants' voting rights and their impacts on the functioning of democracy in immigration countries attract scholarly attention (e.g. Alarian and Goodman 2016; Betts 2002; Martiniello 2005; Renshon 2005, Schlenker 2015; Staton et al. 2007). Here, the notion of single alliance lies at the bottom line of the debates on citizenship as status (Faist 2001; Faist et al. 2004; Gustafson 2005). In this line of thinking, continuous ties that migrants maintain with their countries of origin may be considered as a threat to the stability of the receiving country (e.g. Renshon 2001).

Following the dual citizenship questions concerning formal citizenship in host states, the next dimension is citizenship activity. In the status of dual citizenship, most activity takes place in the receiving states despite the fact that migrants maintain a variety of links with the former country (Vink 2013). Hence, the major question in the dual citizenship literature on citizenship as activity concerns the relationship between migrants' integration and their citizenship, with a particular focus on the measures of integration on acquisition (e.g. Constant et al. 2008) and the impacts of citizenship on integration (e.g. Bevelander and Veenman 2006). In line with this, whether citizenship is the prize or a tool for integration- a distinction often made by Bauböck (2006) and Kymlicka (2003), is a much-discussed aspect. On the one hand, with the zero-sum assumption that retaining ties with one's home country does not allow deepening new ties to the residence country, dual citizenship disrupts migrants' participation and hence integration in the host country due to continuing links with the origin country (Mazzolari 2009). On the other hand, dual citizenship advocates argue that citizenship acts as a pre-requisite for political, social and economic participation and thus, the full recognition of this status would encourage further activity (Bloemraad 2004; Spiro 1998; Guarnizo et al. 2003). A question here is whether easily accessible citizenship actually promotes higher levels of integration in the host countries with regards to which Ersanilli and Koopmans (2010) find host country identification to be enhanced by citizenship even though no such impact is valid for social integration. Concurrently, however, no findings suggest that dual citizenship disrupts this type of integration (Ersanilli and Koopmans 2010).

Next, the dual citizenship literature on identity in the receiving states involves discussions concerning the various models on a spectrum that involves positions ranging from multiculturalism to assimilation (e.g. Joppke 1999; Phalet and Swyngedouw 2003). On the one hand, the "assimilationist" model expects newcomers to do the adjusting in the host society and views citizenship as the reward for immigrants who have proven their loyalty to

the state, often by renouncing their previous national identity (Entzinger 2006, Löwenheim and Gazit 2009). Citizenship acquisition, in this view, is an incentive to integrate (e.g. de Hart and Van Oers 2006, Hailbronner 2006). Hence, proficiency in the language and culture of a receiving state through strict naturalisation tests symbolizes loyalty to the host state (Kostakopoulou 2006). On the other hand, multiculturalism puts forward the idea that the existing practices and institutions need to make adjustments for a heterogeneous society (e.g. Jurado 2008). Along these lines, citizenship acquisition helps to shape individual loyalties by accepting the likelihood of multiple identities (Bloemraad et al. 2008). On this account, discussions on dual citizenship and identity can be considered a litmus test for a wide spectrum of attitudes with regards to membership and belonging.

Following the dual citizenship literature on receiving states through citizenship dimensions, sending states have traditionally received limited scholarly attention with respect to dual citizenship (e.g. Aksel and İçduygu 2013; Fitzgerald 2006, Itzigsohn and Saucedo 2002; Guarnizo et al. 2002; Guarnizo et al. 2003). Dual citizenship in the status dimension has sometimes been examined in terms of ‘emigrant citizenship’ (e.g. Fitzgerald 2006) and “external citizenship” (Bauböck 2009) and through the question of whether emigrants should be allowed to keep their citizenship status due to settlement elsewhere (e.g. Bauböck 2009; López-Guerra 2005; Schlenker et al. 2016). Within this frame, much of this literature concentrates on whether the recognition of dual citizenship by sending countries affects the naturalization rate positively among immigrants in host countries (e.g. Alarian and Goodman 2016; Betts 2002; Mazzolari 2009; Renshon 2005; Vink 2013). Accordingly, research shows that tolerant policies towards dual citizenship have a positive impact on naturalisation rates (Jones-Correa 2001; Vink et al. 2013). Here, Vink (2013) considers the dual citizenship literature to frame origin country citizenship exclusively as a naturalisation effect. In point of fact, sending states’ tolerance of dual citizenship may be considered to facilitate migrants’ integration in the host country by taking away a major source of pressure arising from the loss of original citizenship (Vink 2013).

In terms of the activity dimension, dual citizenship is often assessed as a sending state tool in the literature as many countries make great efforts to strengthen the relationship with their emigrants (e.g. Larner 2007). Emigrants are usually encouraged to have a sense of membership by the sending country, but not to return to homeland (Vertovec 2004). In this regard, dual citizenship supports the continuation of an emigrant’s engagement in the economic and political lives of their country of origin despite permanent settlement

elsewhere (Vertovec 2004). Firstly, the relationship between migration and development is traditionally at the core of migration research within the framework of remittances, financial transfers and future investments (Barabantseva and Sutherland 2011; de Haas 2009; Faist 2007; Jones-Correa 2001; Vink 2013). Secondly, an emigrant's political participation in the origin country is examined in the literature through their engagement in the external offices of political parties, migrant hometown associations, opposition groups and most frequently, usage of external voting rights (Ostergaard-Nielsen 2001; Ostergaard-Nielsen 2003). Emigrants' political participation in the sending countries is a highly contested issue as to whether they should vote (e.g. Bauböck 2006a; Lafleur and Sanchez-Dominguez 2014; Rubio-Marin 2006). Moreover, the status of dual citizenship can have an activating effect on political participation in the country of origin (de Rooij 2012; Itzigsohn and Saucedo 2002; Guarnizo et al. 2002; Guarnizo et al. 2003). The key objection, however, is about future involvement in the polity with the idea that citizens will only participate responsibly if they have to bear the consequences in their home countries (Bauböck 2003; Escobar 2007).

As the last dimension in relation to sending states, identity (Carens 2000; Kymlicka and Norman 2000) represents the key element that links sending states to their emigrants. To encourage belonging and loyalty, sending states reach to their nationals abroad most often through the notion of common identity (e.g. Agnew 1999; Faist 2000). The ties between migrant-sending states and emigrant populations has been studied most frequently in terms of identity through the perspectives of migrant-sending states (e.g. Bauböck 2003; Brand 2006; Cano and Délano 2007; Gamlen 2006; Guarnizo et al. 2003; Levitt and de la Dehesa 2003; Levitt and Jaworsky 2007). For this, especially cultural and religious identity of migrants may go hand in hand (Levitt and Jaworsky 2007). Within the framework of "old blood and religion-based understandings of belonging" as described by Pusch and Splitt (2013), sending states provide emigrants opportunities to study the national language, culture and history in the host country (Gamlen 2008). These services are not only considered as a means of fostering diasporic identity, but as cultural citizenship rights that the sending state is obliged to protect (Gamlen 2008).

With regards to the final actor of international migration, as the dual citizenship literature traditionally concentrates on the broad legal and political aspects of citizenship, migrant perspectives may be the least examined part of dual citizenship (Bauböck 1994; Bauböck 2003; Miller 2000). Primarily, dual citizenship functions as a means of keeping contacts alive, concurrent with allowing emigrants to enhance their position in the receiving



country through naturalisation. Hence, it is considered to be in migrants' advantage (e.g. Escobar 2004; Jones-Correa 2001; Lafleur 2011). The major fault line with regards to migrants' dual citizenship takes place between the traditional and transnational perspectives. The traditional perspective puts forward that dual citizens are less likely to identify with the country of origin while the transnational perspective does not consider such an exclusionist approach (Schlenker et al. 2016). Here, a transnational perspective presumes that multiple memberships and involvements can co-exist or mutually reinforce each other and takes into consideration the continuous ties migrants maintain with their origin countries to address their social, cultural, political, and economic consequences (Escobar 2004; Jones-Correa 2001; Lafleur 2011; Levitt 2002). Hence, as discussed earlier in this chapter, much of the literature on international migrants and their formal citizenship concerns the complications rooted in dual membership. These include challenges in the determination of applicable law in matters involving dual citizens, dual military and tax obligations, the right of access to diplomatic protection and finally, political participation in the form of dual voting (Bauböck 1995; Bauböck 2005; Bowden 2003; Faist 2001; Hansen and Weil 2002; Jones-Correa 2001; Legomsky 2003; Martin and Hailbronner 2003; Vonk 2012)

In terms of the literature on migrants' activity and dual citizenship, most studies concentrate on migrant perspectives of activity in the receiving states. Regarding economic participation, the general focus is on the positive influences in terms of migrants' integration such as unrestricted access to the labor market, better employability, full protection against expulsion and access to public employment (e.g. Faist and Gerdes 2008; Liebigh and von Haaren 2011; Vink 2013). In terms of economic linkages with the origin country, one strand of literature concerns the conditions that shape migrants' economic linkages with the origin country (e.g. Guarnizo et al. 2002; Guarnizo et al. 2003). Another strand of literature explores the remittance behavior of migrants (e.g. Amuedo-Dorantes and Pozo 2006; Guzmán et al. 2008; King et al. 2006; Osaki 1999) either in terms of the remittance-sending end or remittance-receiving households with the key question being whether remittances are used on investment or consumption. In the aspect of political participation, the major question in the literature is whether dual citizens should have access to political participation in both polities. From one point of view, political attachment to one national context does not happen at the expense of another (e.g. Mazzolari 2009, Smith and Guarnizo 1998). Another point of view is that it is nearly impossible to be an engaged and knowledgeable citizen of more than one country (e.g. Renshon 2005). As the final aspect of the activity dimension,

dual citizenship studies on social participation have concentrated on the question whether close relations with the origin country impede or support the social incorporation of immigrants into the host society. From one stance, migrants' strong transnational involvement and integration into the host country do not rule each other out (Portes et al. 2002). From another stance, some studies find that, not for the immigrants with high income, education, and language skills, but for the underprivileged migrant groups, continuing transnational identifications and retention of traditional home country customs may possibly impede adequate incorporation into the host country (Joppke and Morawska 2003; Levitt 2003; Morawska 2003).

Finally, studies on migrants' identity concentrate mostly on belonging and loyalty. Primarily, issues of belonging and identification render national citizenship complicated for migrants as they may negotiate multiple identities and allegiances (Hammar 1990; İçduygu 2005). Migrants, thus, challenge conceptions of bounded national citizenship (Ehrkamp and Leitner 2006). Along these lines, some studies have found that incorporation into the receiving country does not necessarily weaken the obligations immigrants feel towards their country of origin and instead, simultaneous identification with two different countries may co-exist (Itzigsohn and Saucedo 2002; Bloemraad 2004; Tsuda 2012).

### **3.1 Paralysis of formal citizenship: Impacts on the legal status dimension of citizenship**

Due to the understanding that citizenship rights and duties are dependent on mono-citizenship, the first core question in the dual citizenship literature concerns the impacts of dual citizenship on formal citizenship and whether this institution causes the paralysis of citizenship as status. While opponents of dual citizenship underline the complexities arising from membership to more than one country, advocates of dual citizenship often believe these complications are highly exaggerated. Moreover, some proponents of dual citizenship call for the mutual acceptance of dormant citizenship to bypass the possible complications in relation to the formal status of citizenship (Faist 2001, 27). Here, dormant citizenship involves the employment of full citizenship only in the country of actual residence and the suspension of rights and duties in the partner country until the migrant relocates the place of residence (Faist 2001, 27).

Following this introduction to the debates on the impacts of dual citizenship on the legal status dimension of citizenship, this section will assess the existing standpoints with regards to citizenship rights and duties that constitute the formal status of citizenship.

### *Citizenship duties*

Citizenship duties through which dual citizenship is argued to cause the paralysis of formal citizenship are obedience to law, taxation and finally, military service. In the context of dual citizenship where citizens have more than one membership, the aspect of law appears with regards to the difficulty of determining the applicable law in cases involving dual citizens. Following this first element under citizenship duties, the subject matter of taxation emerges in relation to the risks of dual taxation and concerns of tax evasion. Finally, the issue of military service arises in relation to the security context and the risk of the obligation of serving in two militaries.

#### Obedience to law

In the context of dual citizenship, the duty of obeying laws can be assessed in terms of the difficulties of determination of applicable law in cases involving dual citizens. On the one hand, according to its opponents, dual citizenship may hinder the functioning of the judiciary by blurring the attribution of jurisdiction (Oeter 2003, 56). Because legal matters are technically dependent on the status of mono-citizenship, dual citizenship leads to doubts as to which state may claim the competence in criminal and civil matters and generate challenges in the personal lives of migrant families especially in the area of private law including marital status, adoption and inheritance (Martin 2003, 18; Oeter 2003, 56). Moreover, technical challenges are most visible in legal areas where states still claim exclusive jurisdiction over citizens such as in extradition law in which states typically do not accept that another state may prosecute their own citizens (Hailbronner 2003, 76).

On the other hand, proponents of dual citizenship agree that existing legal mechanisms for solving conflicts of jurisdiction are developed enough to absorb the potential conflict between states. To illustrate, the principle of effective citizenship can solve the tension on the ground in cases of dual citizenship (Oeter 2003, 59). With effective citizenship, through the understanding that applicable law is that of the country of habitual residence, the determination of applicable law does not constitute a major source of

challenge (Naujoks 2009, 2). Accordingly, with the application of the effective citizenship criterion, states can avoid conflict over dual citizens by accepting their multiple membership (Oeter 2003, 76-77).

## Taxation

The second argument with regards to the paralysis of formal status of citizenship includes doubts over the taxation of migrant earnings representing a major challenge for states and leading to practical and technical complications stemming from overlapping sovereignties (Brand 2006; Işın and Turner 2007, 9; Pogonyi 2011, 688).

In the debates over dual citizens' taxation duties, on the one hand, opponents of dual citizenship highlight several risks to argue that taxation regimes may be a source of conflict. To begin with, some states assert the right to tax their citizens when they reside in the country and others, on the basis of citizenship regardless of residence causing a dual obligation for migrants (Martin 2003, 18). Secondly, dual citizenship may allow non-tax payers to benefit from public services, health care and pension systems in both sending and receiving countries, generating inequality in the society (Pogonyi 2011, 698). Thirdly, the globalization of the world economy and the development of a global economic elite further complicate the issue of taxation (Koslowski 2003, 170). With the trend of commodification and the utilitarian view of dual citizenship, additional citizenships may be employed to execute a tax evasion strategy (Koslowski 2003, 170). Accordingly, the increased mobility of both individuals and their capital combined with the increasing ability to move money electronically increase obstacles against states' tax collection (Korbin 1997).

Despite these arguments by the skeptics, on the other hand, supporters of dual citizenship no longer consider the issue of taxation as an obstacle against the institution of dual citizenship due to the existing bilateral arrangements and multilateral treaties (Brand 2006). From this angle, the risk of tax evasion is a natural consequence of the increasingly global world that can be omitted through further state cooperation (Martin 2003, 18).

## Military Service

Finally, a typical argument for the paralysis of formal citizenship in case of dual citizenship is the issue of military service (Østergaard-Nielsen 2008, 6). In the existing

situation, while the eligibility criteria for military service varies from state to state, an individual's dual citizenship is rarely a disqualification for military service (Legomsky 2003, 86). Here, the issue of obligatory military service should be assessed from the viewpoints of the three key actors involved. From the viewpoint of receiving states, even though cases of war may be less frequent today, an uncertainty on the migrants' readiness to defend the nation in case of armed conflict may make it risky to host dual citizens (Barabantseva and Sutherland 2011, 3). From the sending states' viewpoint, a sending state may be unwilling to lose manpower and further, may even strategically plan to strengthen ties with migrants through conscription (Barabantseva and Sutherland 2011, 3). Next, from the migrants' perspective, problems might arise if a dual citizen could formally be obliged to serve in two militaries (Gustafson 2005, 12).

Within this frame, the fundamental question is which state has superior drafting rights if conscription is valid in the residence or origin country. In cases where no state agreements provide for a mutual recognition of military service, conflicting obligations or loyalties may create difficulties (Hailbronner 2003, 25). In most cases, however, bilateral and multilateral treaties give primacy to the residence state's claim and hence, the residence state has the principal drafting rights (Martin 2003, 16). While treaties concerning this subject vary in several respects, they share the universal theme that service in one state should discharge the obligation in the second state and dual citizens who have served in one state's military should not be obligated to serve again in the other state's military (Legomsky 2003, 95). Finally, the *Article 21 of the European Convention on Nationality (1997)* states that dual citizens should fulfill their military obligations to only one of the states, which will commonly be the state of habitual residence (Hailbronner 2003, 26). Furthermore, this convention allows that the migrant should submit voluntarily to military obligations and prohibits the other state of citizenship from conscripting a dual citizen enlisted in the other state's military (Legomsky 2003, 94).

Along these lines, a key question in the context of international migration and dual citizenship becomes whether a dual citizen not subject to conscription in the residence state should be liable to conscription in the non-residence state (Legomsky 2003, 106). A rule that immunizes dual citizens from conscription if they receive citizenship in a non-conscripting state may be a pull factor for young men to migrate and acquire a second citizenship solely to avoid military obligations (Legomsky 2003, 106). In such a case, the dual citizen would

either be forced to renounce his citizenship of the non-residence state or refrain from visiting the non-residence state in order to avoid forced conscription (Legomsky 2003, 106).

Overall, despite an array of multilateral and bilateral agreements on the subject of military service, solutions brought to such technical aspects of military obligations of dual citizens are much varied and not yet governed by widely accepted rules (Legomsky 2003, 98). Hence, despite the decreasing armed conflicts across the globe, this subject still requires the balancing of state expectations and migrant interests (Legomsky 2003, 123).

### *Citizenship rights*

Citizenship rights argued to paralyze the formal dimension of citizenship in the context of dual membership are voting and diplomatic protection. With regards to the first right, voting for elections in a particular state is believed to be a sign of allegiance to that country and hence, voting in another polity, especially where one is a non-resident, is traditionally unthinkable (Spiro 2003, 136). In relation to the second right, complications arise because the traditional international law disentitles a country to exercise diplomatic protection against another country (Martin 2003, 15). Within this frame, this section assesses the dual citizenship debates on the rights of voting and access to diplomatic protection.

### *Voting in elections*

Because political rights are directly linked with the status of citizenship, the divorce between territoriality and citizenship complicates the concept of political membership (Escobar 2007, 47). First, from the perspective of migrants, the growing mobility in the global world has led to new citizens interested in the politics of their country of origin even though they may live elsewhere (Østergaard-Nielsen 2008, 4). Secondly, in the state context, in an environment where citizenship loses its strict linkage to territoriality, state reactions towards voting rights range from being denied to being obligatory based on the historical and political contexts, state interests and political weight of the migrant population in both sending and receiving countries (Faist and Gerdes 2008, 12; Østergaard-Nielsen 2008, 10).

Within the frame of dual voting, opponents of dual citizenship raise several concerns. The first point of argument is that dual citizens who vote in two polities violate the most fundamental principle of democratically legitimated membership and governance known as 'one person, one vote' by voting more than once (Faist 2001, 4). In this thinking, dual voting

hinders the functioning of democracies. The second point of argument is that the exit option dual citizens hold in the face of adverse conditions in one country creates an inequality within a nation's citizenry (Martin 2003, 24). Due to this exit option, the possibility that voters may not need to live with the consequences of their votes may push them towards a less responsible exercise of civic duties and even towards radical political wings (Martin 2003, 24).

On the same ground, opponents of dual citizenship highlight the risk that dual citizens may become puppets of their home country government in the receiving country and hence, lead to an internal security threat (Martin 2003, 13). In this thinking, foreign election campaigns among immigrants may be problematic due to security reasons and immigrants' long distance political engagement and loyalty to various organizations in their origin country may be considered as obstacles against their integration (Gilbertson 2006). The final concern raised by opponents of dual voting is that, with this status, dual citizens may receive legal benefits from a state to which they feel no personal attachment and owe no binding obligations (Legomsky 2003, 84). By voting in two separate polities, dual citizens enjoy the benefits of a status that is not available to mono-citizens in either country and thus, are at least symbolically superior to others within the same nation (Martin 2003, 13).

Supporters of dual citizenship, however, downplay the significance of these arguments because they do not agree with the term dual voting. Primarily, even if voting rights are exercised in more than one country, votes do not count twice because they are aggregated in different elections and polities (Faist and Gerdes 2008, 12). To illustrate, in a future scenario where a common European government in Brussels will be based upon popular elections, dual citizens can vote twice in the same polity of the European Union where their votes may constitute a challenge against democracy in this polity (Faist 2001, 26). Currently, however, this point of discussion seems distant. For today, as the concept of equality is valid within a specific political arena, dual citizenship offers no extra privileges in elections and thus, does not constitute a threat to equality among voters (Martin 2003, 14).

Secondly, an increased number of voters to participate in the elections can be considered as a benefit for the functioning of a democracy in line with the principle of congruency (Faist and Gerdes 2008, 12). Along these lines, in the case of host countries, because the presence of large numbers of foreign citizens without electoral rights represents a democratic deficit, dual citizenship can lead to a greater congruence between the population and the citizenry (Østergaard-Nielsen 2008, 6). Moreover, research on migrants'

interest in political participation demonstrates, interestingly, that political participation in the country of origin can reinforce political incorporation and integration in the country of residence (Østergaard-Nielsen 2001). Hence, receiving states' suspicions concerning migrants' long distance political interest may be unfounded in the sense that it does not block the political interest towards the residence country.

Thirdly, at the bottom line, dual citizens' right to vote in both origin and residence countries should be considered natural (Blatter 2008, 10)<sup>14</sup>. Based on Bauböck's principle of stakeholder citizenship, all individuals who have a stake in the future of a society should have political participation rights (Bauböck 2006a). Moreover, for supporters of dual citizenship, migrants' right to vote in elections in both origin and residence countries may even reflect positively on a macro-scale democracy through political participation (Blatter 2008, 3). Because dual citizens can serve as representatives of peripheries in central states, they can support the formation of positive policies in relation to their origin countries (Blatter 2008, 3).

#### Diplomatic protection

The second formal right that leads to debates with regards to the paralysis of formal citizenship is dual citizens' access to diplomatic protection. While this topic has not received much scholarly attention, it often raises public concerns (Stasiulis and Ross 2006, 331).

Traditionally, state laws can only be applied to citizens present in the state territory, whether mono-citizens or dual citizens. Still, growing international migration and increasing instances of dual citizenship have shaped the notion of diplomatic protection (Martin 2003, 15). Defined by the *Special Rapporteur on Diplomatic Protection of the International Law Commission* (2000) as the "action taken by a State against another State in respect of an injury to the person or property of a national caused by an internationally wrongful act or omission attributable to the latter State" (Forcese 2005, 472–473), diplomatic protection includes a wide range of possible activities such as consular action, negotiation, mediation, judicial and arbitral proceedings, reprisals, severance of diplomatic relations, economic

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<sup>14</sup> In line with the principle of congruency, it should be added here that supporters of dual citizenship even take the discussion further by suggesting that non-citizen residents should vote in their country of residence (Betts 2002, 61; Munro 2008).



pressure and finally, the use of force (Naujoks 2009, 2). Today, some forms of diplomatic protection such as consular action and negotiation are frequently exercised by one country of citizenship against the other (Hailbronner 2003, 20).

Within this frame, opponents of dual citizenship stress that state conflicts may arise where a state, entitled to protect its subjects against acts contrary to international law committed by another state, chooses to intervene to protect a citizen (Naujoks 2009, 2). Supporters of the dual citizenship status, however, highlight that the presence of dual citizens has not yet led to a major international tension (Naujoks 2009, 2). Beyond this, today, diplomatic initiatives to protect the rights of individuals can be based on the international human rights doctrine even without a citizenship link (Martin 2003,15). According to this thinking, the current world order increasingly accepts a broad understanding of universal human rights as a basis (Martin 2003, 15). In the end, various international conventions and treaties on both regional and universal level provide the right to file a complaint before international bodies in cases of violation of rights and the nation state is no longer the only protector of human rights (Hailbronner 2003, 20). Hence, from the viewpoint of supporters of the status, difficulties of diplomatic protection cannot be maintained as a significant objection against the status of dual citizenship.

In the area of diplomatic protection, a final remark is made concerning the “inbetweenness” and the legal ambiguity of this status. Dual citizenship may be perceived as a disadvantage because it remains in a grey area in the international arena with no conventions directly applying to this status (Hacıoğlu et al. 2014, 1). Lacking global governance, an international framework and any consensus on its legal structure, no human rights protection is offered specifically to dual citizens (Stasiulis and Ross 2006, 343). In this vacuum, existing in a space negotiated by states, dual citizenship is subject to international norms generated by strategic state interests and security. Thus, holders of this status suffer from this ambiguity in international law in the context of increasing securitization especially in a period which witnesses the global war against terror where dual citizens have been perceived by states as prime suspects (Stasiulis and Ross 2006, 343).

Following this assessment of the various standpoints in the debates in relation to citizenship as formal status and the question whether dual citizenship paralyzes this dimension of citizenship, the next section will examine the function of dual citizenship in relation to integration.

### **3.2 Barrier or catalyst of integration: Impacts on the activity and identity dimensions of citizenship**

Following the debates of the impacts on formal citizenship, the second question at the core of the dual citizenship literature is how this institution functions in the dimensions of activity and identity and whether it operates as a barrier against or a catalyst of integration in the host countries. From one angle, opponents of dual citizenship suggest that migrants' linkage to their home country may limit migrants' integration in the host country (Gsir 2014, 9). From another angle, supporters of dual citizenship consider that granting the right of dual citizenship to immigrants stimulates their integration by taking away a major constraint against integration (Vink 2013, 1).

#### *Citizenship dimension of activity*

Citizenship as activity in the context of dual citizenship and the function of dual citizenship in relation to integration are major sources of debate. In the context of international migration, the activity dimension of citizenship may be described as what a migrant owes to the host community and constitutes of participation in the political, social, economic life of the community (Kostakopoulou 2003, 86; Oers 2013, 18). Through the lens of this dimension, from one perspective, dual citizenship excuses migrants from integration by offering them the possibility to return to home country. Hence, the renunciation of prior citizenship serves as a loyalty oath and is critical because it demonstrates migrants' willingness to integrate (Faist 2007, 65). From another perspective, dual citizenship motivates migrants to participate in the political, social and economic life of the host community. Within this frame, whether citizenship acquisition is the facilitator or catalyzer of the integration process with a pragmatic, instrumentalist view or the prize of a completed integration process depends on the definition of integration (Faist 2007, 62).

Primarily, integration is understood as the process through which immigrants are accepted into society both as individuals and as groups (Penninx 2003). Here, when defined as exclusive loyalty of migrants to only one state, integration transforms into a zero-sum game where a migrant is either in or out depending on the migrant's performance with no intermediate conditions (Faist and Gerdes 2008, 3). In this thinking, citizenship should be granted only after a high degree of successful participation in economic, social and cultural spheres of society (Faist 2007, 64) or in other words, a performance of deservingness (Garcés-Mascareñas 2015). Along these lines, the expectation of a proof to evaluate

migrants' readiness to integrate in the host country, stricter language and integration requirements are employed as a precondition for acquiring residence permits and citizenship (Faist and Gerdes 2008, 13).

In contrast, when integration is defined as a mutual and dynamic process, full political inclusion and participation of migrants in the decision-making process become crucial (Faist and Gerdes 2008, 3). Here, political participation functions as a tool for migrants to change the distribution of resources and opportunities and challenge adverse policies (Bevelander and Spång 2014, 2). Moreover, increasing non-electoral political participation and the ability to use a repertoire of political actions that allows migrants to influence decision-making, dual citizenship contributes to a well-functioning democracy (Morales 2011, 41; Pikkov 2011).

From this point of view, harsher criteria of inclusion such as the renunciation of original citizenship and the requirement of citizenship tests are often not considered to serve their purpose of excluding migrants who are not genuinely interested in host country citizenship for several reasons (Kalekin-Fishman and Pitkanen 2007, 5). First, they target those already willing to acquire citizenship (Martin 2003, 16). Second, they have no effect on migrants' surrendering their old culture and hence, cannot end the skeptics' fear of migrants' endangering the integrity and homogeneity of the nation (Martin 2003, 16). Thirdly, if citizenship criteria are too demanding, they may discourage applications for naturalization and hamper migrants' integration efforts (Martin 2003, 16). From this perspective, standing against dual citizenship because it degrades the traditional institution of citizenship is not realistic.

In this thinking, dual citizenship also functions as a strong instrument to facilitate and promote migrant integration in the area of economic participation through unrestricted access to the labor market and better employability, full protection against expulsion, access to public employment and decreased administrative difficulties (Faist and Gerdes 2008, 11; Liebig and von Haaren 2011, 17; Vink 2013, 5). Hence, in contrast to those who put integration before citizenship, proponents of dual citizenship see economic participation as subsequent to citizenship (Faist 2007, 64). Along these lines, the benefit of the state tolerance of dual citizenship is to decrease the rights gap between the resident immigrants and the general population (Faist and Gerdes 2008, 3).

### *Citizenship dimension of identity*

In the final citizenship dimension, identity, highlights the social status of membership to a polity and the identification with it together with other concepts such as loyalty, social cohesion, commitment, solidarity and ‘we’ feelings (Antonsich 2010, 19; Carens 2000, 166). In the debates asking whether dual citizenship hinders integration, the key question is whether a migrant can identify with two different polities. Here, as international migration complicates the notion of citizenship defined in reference to a sense of belonging with only one nation state, many migrants feel belonging to more than one nation (Hammar 1990) and hence, feel “puzzled by accounts of their legal status, identities and civic virtues on the one hand and those of their membership status, sense of belonging, and attachment on the other hand” (İçduygu 2005).

In the background of the identity dimension, the traditional thinking on loyalty stems from the nineteenth-century world order where transnational interaction was limited, alliances among states were temporary and opportunistic and citizenship was received as a badge of loyalty (Barabantseva and Sutherland 2011, 2). In this period, loyalty was considered a citizenship duty in return for state rights, security and protection (Barabantseva and Sutherland 2011, 2; Martin 2003, 11). Hence, until recently, loyalty, national belonging and citizenship were considered to be indivisible elements and dual citizenship was conceived as bigamy (Faist 2001, 3; Martin 2003, 11).

Along these lines, opponents of dual citizenship consider overlapping membership, dual ties and loyalties of citizens to violate the principle of popular sovereignty (Faist 2001, 4). Their main suggestion is that migration should involve a transfer of migrants’ sense of belonging from their former to their new home country to prove loyalty to their residence states. Advocates of dual citizenship, however, consider the receiving states’ demand for renunciation of the original citizenship upon naturalization to function as a major obstacle for migrants’ identity (Østergaard-Nielsen 2008, 5).

Thus, rather than the demand for renunciation of migrants’ original citizenship, the tolerance of dual citizenship recognizes migrants’ identity, which involves attachments, involvements, and symbolic and emotional ties with their home country (Faist 2000). As not all immigrants experience a uniform path of integration, tolerance of dual citizenship provides migrants the opportunity to choose their own integration course (Faist 2000). Instead of forcing migrants to confront the emotional difficulties of giving up a citizenship,

dual citizenship acts as the legitimization of multicultural identity and coupled with this legitimization, the recognition of transnational ties and related multicultural skills may facilitate migrants' identification with the state of residence (Faist and Gerdes 2008, 10). In this perspective, accepting dual citizenship reduces "the negative consequences of the rupture between emotional and instrumental belonging" of migration and regards the feelings of national belonging as normal and potentially beneficial for migrants' integration (Gustafson 2005, 17).

Hence, in the context of dual citizenship and the dimension of identity, advocates of dual citizenship underline the need for a novel idea to replace the old notion of loyalty. Accordingly, perceiving dual citizenship as the political foundation of a transnational experience which enables migrants and their children to lead dual lives across borders may be more accurate in comparison to the insistence of singular loyalty (Faist 2006, 6). Along these lines, proponents see the recognition of a globalizing world in the concept of dual citizenship (Jones-Correa 2001, 1014).

### **3.3 Concluding remarks**

In its confrontation with growing dual citizenship, on the whole, the traditional institution of citizenship is in a process of transformation due to pressure from various citizenship dimensions. Despite the heterogeneity in citizenship characters and the different processes of democratization in each country, the views of advocates and skeptics of dual citizenship are similar. In broad strokes, the main point of convergence is rooted in the fact that increasing instances of dual citizenship unsettles the traditional nation-state focused assumptions of citizenship by posing new kinds of questions about membership, participation and belonging (Kalekin- Fishman and Pitkanen 2007, vii).

In the question of whether dual citizenship leads to a paralysis of citizenship as formal status, tensions stem from the duties in relation to law, taxation and military obligations and citizenship rights including voting and diplomatic protection. To summarize the challenges in relation to citizenship duties as formal status, with regards to the complications in legal matters involving dual citizens, the key question is whether dual citizenship hinders the functioning of the judiciary by blurring the attribution of jurisdiction or existing legal mechanisms for solving conflicts of jurisdiction are developed enough to absorb the potential challenges. To continue with duties, despite the fact that obligatory

military service is generally on decline and dual military obligations may cease to be a widespread concern in the current circumstances, the collection of taxes still receives critical attention. With respect to taxation, because countries follow distinct rules on the taxation of non-resident citizens, incoherencies in the regulations may either create extra burden on migrants or open a route to tax evasion.

In the area of citizenship rights, even though the need for diplomatic protection may be a rare incident, the subject matter of voting in more than one polity still represents the crucial debate in relation to dual citizens. In addition to the violation of the most fundamental principle of “one person, one vote” in democracies, dual citizens’ easy exit option, political influence on a non-residence country and the security risk rooted in distant governments’ possible manipulation of migrants in the elections are controversial features in the increasing trend of dual citizenship. In response, from a rights-based perspective, dual citizenship may be considered as the political foundation of a transnational experience for migrants. Along these lines, dual citizens contribute to democracy as their votes are never counted twice in the same polity and they serve the principle of congruency.

In the question of whether dual citizenship acts as a barrier against or catalyst of integration, with regards to the citizenship dimension of activity, the core question is whether granting of a second citizenship facilitates or hinders migrants’ integration process. Against the idea that citizenship should be the prize of integration in the host community, the extension of political rights through granting of citizenship and simultaneously allowing the maintenance of the original citizenship link can provide migrants with tools and services to more easily interact with the host society and facilitate their integration (Gsir 2014; Levitt and de la Dehesa 2003). In this regard, proponents of dual citizenship often hold a more transnational view of migration, and regard the maintenance of dual national bonds as a functional tool for facilitating integration in receiving countries (Koslowski 2000, 143).

In the final dimension of identity, a widespread debate concerns the issue of loyalty and commitments of dual citizens. Here, dual citizenship’s linkage to integration is more complex than a legalistic approach that sees citizenship solely as legal ties with the host state (Kalekin- Fishman and Pitkanen 2007, 23). Traditionally, as loyalty cannot be divided between states, dual citizenship may violate popular sovereignty and constitute a threat to the sovereignty of states. Thus, the expansion of dual citizenship forces the notion of single loyalty that is fundamental to the traditional notion of citizenship.

As an overview, first, the existing literature on the citizenship dimensions of legal status reveals that opponents who put forward pessimistic claims on how dual citizenship leads to a paralysis of citizenship consider dual citizenship as “rights without sufficient duties” (Gerdes et al. 2007, 68) in contrast to the proponents’ ideas that complications in relation to formal dimension can be overcome through various ways. To continue, the existing literature holds a duality between suspicions and expectations concerning the impacts of dual citizenship on integration. Here, the question is whether dual citizenship functions as a barrier against integration acts as a catalyst for migrant integration. Both these fears and hopes are widely exaggerated (Faist 2001).

Against this background, adopting a middle position in the assessment of dual citizenship will serve to go beyond opinions that consider dual citizenship as “evil” or “intrinsic value in political communities” (Faist 2001, 6). In this direction, the analysis of dual citizenship should not be constrained by definitive questions that disregard the multiplicity of dual citizenship by presenting this complex institution as one that operates homogeneously across the globe. Despite their reductionist approach, however, the questions whether dual citizenship causes the paralysis of formal citizenship and if it acts as a barrier against or a catalyst of integration function as stepping stones to broaden the study of dual citizenship to include all actors of migration and elaborate the analysis by dissecting its operation in accordance with citizenship dimensions.

## CHAPTER 4

### Moving the context: Case of Turkey

Relocating the attention on dual citizenship from the West to the context of Turkey, the assessment of how dual citizenship affects the traditional institution of citizenship based on Kymlicka and Norman's (2000) citizenship dimensions of formal status, activity and identity in Turkey primarily requires an introduction to the international migration framework of this country. Hence, this chapter will first present an overview of international migration in Turkey that highlights Turkey's transformation from a traditional country of emigration to a receiving country with intensifying immigration. Subsequent to this overview, a background for the status dimension of dual citizenship will shed light on the formal citizenship acquisition in Turkey with an emphasis on rights and duties in the context of both emigration and immigration. The following section will focus on the participation and identity dimensions of dual citizenship in Turkey's international migration space.

In the assessment of dual citizenship, as neither citizenship characters nor the processes of democratization are homogenous across countries; debates concerning this institution should be analyzed at national levels. Still, before moving on to the background for dual citizenship in the context of Turkey, a few words are necessary on the dual citizenship institution in relation to a country's position in the context of international migration. Despite the general expansion of state tolerance towards dual citizenship in response to increasing migration across the globe, migrant sending and receiving countries still often approach the issue of dual citizenship dissimilarly.

On the one hand, sending countries have traditionally been more in favor of dual citizenship due to the instrumentality of this status to reassert state sovereignty beyond territorial boundaries (Brand 2006, 26; Faist 2006). Receiving countries, on the other hand, have historically been more suspicious of dual citizenship because it violates the principle of singular loyalty to a sovereign nation (Jones-Correa 2001). Hence, while the integration of foreign nationals raise numerous questions concerning their membership and participation in host countries, sending states often look beyond their territories in order to draw those they deem co-nationals into a new sphere of influence (Barabantseva and Sutherland 2011, 1). In cases where two migratory movements exist simultaneously, states' approach to dual



citizenship of their nationals abroad and foreign immigrants may differ in terms of formal status, participation and identity dimensions.

With the purpose of an integrative and in-depth understanding of the dual citizenship institution and its dimensions, even though this research concentrates solely on Turkey's immigration scene within a triadic structure that also involves sending countries and immigrants, this background chapter will assess Turkey's approach to migrants' dual citizenship in Turkey's larger migration context. Hence, the aim here is not only to shed light on the citizenship dimensions of formal status, participation and identity in Turkey's immigration space, but also assess the matter in the context of emigration in a comparative manner and present the co-existing approaches to dual citizenship concerning both emigrants and immigrants.

#### **4.1 International migration in Turkey: an overview**

To begin with, a periodization of Turkey's position in the international migration scene illustrates a transformation from the nation-building era of the first half of the 20<sup>th</sup> century to full participation in the migration arena today and concurrently, a position shift from a sending country to a double status as both an origin and destination country (İçduygu et al. 1999).

##### *First period of international migration: nation-building*

In the first stage of Turkey's migration periodization, during the founding years of the Republic, the development of a new citizenship concept in the national polity went conjointly with the nation-building process (Soyarık 2000). In the formation of the Turkish nation, despite the formal definitions that reflected a civic republican understanding, the state was not blind to religious and ethnic groups (Kirişci 2000). During the first half of the 20<sup>th</sup> century, between the years 1923 and 1950, state policies pursued by the newly established Republic led to massive emigration of Turkey's non-Muslim population (e.g., Greek Orthodox Christians to Greece) and the immigration of Muslim and Turkic populations living in neighbouring countries (İçduygu and Kirişci 2009; İçduygu and Sert 2009, 2). Thus, the notion of national citizenship emerged through the exclusion and assimilation of various ethnic and religious differences represented by Greeks, Armenians, Jews, Kurds, Arabs, Alevis, Circassians, Georgians and Lazes (Kadıoğlu 2007, 284; Kaya 2012, 13).

### *Second period of international migration: a traditional country of emigration*

Following these ethnic and religious based population movements in the first period, migration in the second period from 1950 to 1980 constitutes of labor emigration to Western Europe, Middle East, North Africa and Commonwealth of Independent States (İçduygu and Kirişci 2009). Primarily, emigration from Turkey started with labor emigration to Western European countries from 1961 and continued until mid-1970s. Following various bilateral labor recruitment agreements with the Federal Republic of Germany (1961), Austria, Netherlands, Belgium (1964), France (1965), Sweden and Australia (1967) (İçduygu and Sert 2009, 2), a total of nearly 800,000 workers migrated to Europe through Turkish Employment Service between 1961 and 1974 (Akgündüz 2008)<sup>15</sup>.

From the 1970s onwards, in spite of the restrictions of European countries on regular labor migration, Turkish population in Europe increased through migration based on family unification (İçduygu and Kirişci 2009). Concerning family based migration; not only married migrants were later joined by their families, but most single labor emigrants returned home to marry Turkish women and consequently, established their families in their host countries (Gelekçi 2014).

Following the decreasing appeal of Western Europe as a target, new destinations for labor migration consisted of Middle Eastern and North African countries, as well as the Commonwealth of Independent States after the collapse of the Soviet Union in 1989 (İçduygu and Kirişci 2009). In the first place, as a result of the 1973 oil crisis and the decline in Europe's intake of migrant labor, oil-rich Arab countries became destinations for Turkish emigration (İçduygu and Sert 2009). Following an increasing influx of Turkish migrants into Libya and Saudi Arabia between 1967 and 1980, the range of destination countries expanded to include Iraq, Kuwait, Yemen, and Jordan between 1981 and 1992 (İçduygu and Sert 2009, 3). Finally, as a result of the Gulf Crisis of 1991, migration to this region declined steadily from 1993 onwards (İçduygu and Sert 2009, 3).

To continue, with the end of the Cold War, the dissolution of the Soviet Union and the emergence of the Commonwealth of Independent States led to contract-based migration to Russia, Ukraine, and the Turkic Republics and later, to Romania and Poland (İçduygu and

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<sup>15</sup> In this population, 649,000 (81 percent) migrated to Germany, 56,000 (seven percent) migrated to France, 37,000 (five percent) migrated to Austria and 25,000 (three percent) to the Netherlands (Akgündüz 2008).

Sert 2009, 3). In 1995, the number of Turkish emigrants admitted in the Commonwealth region reached almost the double of the Turkish nationals in the Arab countries (İçduygu and Sert 2009, 3). Unlike the labor emigration to Western Europe that was mostly on permanent basis, however, migration to these regions was often based on temporary periods.

Finally, in addition to labor emigration that constitutes a major cornerstone in Turkey's migration periodization, since the early 1980s, the intervention of the Turkish military in civilian politics and the escalation of violence resulting from the efforts to repress the separatist Kurdish movement in Southeastern Turkey have caused many of Turkey's citizens to seek asylum in Western Europe (İçduygu and Kirişci 2009). Between the years 1981 and 2005, over 664,000 Turkish citizens applied for asylum mostly in various European countries (İçduygu and Sert 2009, 4).

Apart from these labor emigrants and asylum seekers, the case of Turkey's Jewish community should not be neglected. The migration of Jews from Turkey to Israel is the second largest mass emigration movement out of Turkey, the first being labor migration to Europe (Toktaş 2006, 1). During the Second World War, the fear that the Nazis would occupy Turkey coupled with the ideal of contributing to the establishment of a Jewish state in Palestine and the intensive Turkification process in Turkey were causes of this emigration (Toktaş 2006, 511). A few years after the establishment of Israel, the emigration of Jews to Israel slowed down but has continued, although in lesser numbers, until the present day. Today, the Jewish emigrants and their younger generations in Israel reached more than 100,000 among which immigrants from Turkey living in Israel who have not given up their Turkish citizenship is around 20,000 (Toktaş 2006, 513). Thus, Jewish emigrants may be considered a major dual citizen community of Turkey.

As for the irregular movements, irregular Turkish emigrants constituting mostly young men are among the top 15 country nationals in 2014 with numbers over 10,000 since 2008 (Eurostat, Aksel 2014, 346). Germany, United Kingdom, Hungary, Netherlands and Poland are among the top five countries that remove Turkish nationals with numbers typically less than a thousand migrants (İçduygu and Aksel 2014, 346). This irregular population, however, has not been regarded as a major concern by the Turkish state.

To finalize with Turkey's emigration space, Western Europe continues to this day to be the main destination for emigrants from Turkey. Based on estimations, 15 to 20 thousand Turkish citizens migrate to Europe annually, close to half being high- skilled professionals

and students intending to stay long-term in Europe (İçduygu 2014). By the late 2000s, over three million Turkish citizens resided abroad with 2.7 million of this population based in European countries (İçduygu and Kirişci 2009). Today, approximately six percent of Turkey's population lives in other countries (İçduygu and Kirişci 2009).

Concerning emigrants' citizenship acquisitions abroad, while their percentages vary from country to country, of the four million Turkish nationals in Europe, 1.5 million received host country citizenship (İçduygu 2014, 786)<sup>16</sup>. In this regard, Turkish migrants and their European-born family members are the largest group of non-nationals residing in the EU, accounting for 0.6 percent of the EU population (İçduygu 2014, 786). Moreover, citizenship acquisitions by Turkish nationals have not come to a halt after the waves of labor emigration. According to Eurostat statistics of February 2015, Turkish nationals who received EU citizenship were close to six thousand in both 2013 and 2014, making Turkey the 23<sup>rd</sup> and 30<sup>th</sup> top origin country in these years concerning citizenship acquisitions in Europe. While the proportion of dual citizens in this population cannot be known, Turkey's strong encouragement of dual citizenship for this migrant category may have led to a large dual citizen community residing abroad.

### *Third period of international migration: transformation to a country of immigration and transit*

In addition to continuing emigration, Turkey slowly transformed into a country of immigration and transit migration interlinked with the European migration system in the third period of international migration (Erder 2000; İçduygu and Kirişci 2009). Primarily, the liberalization of the economy after the military coup of 1980 and the general impact of the globalization process have turned Turkey into a more desirable place for immigrants. Simultaneously, the blend of political turmoil and economic transformations over the last thirty years in the region, which include the insecurity after the Iran-Iraq war and the Gulf Crisis and the collapse of the Soviet Union and the socialist systems in Eastern Europe, either attracted people to enter Turkey to find temporary work, to seek asylum or to pass to Europe (İçduygu and Aksel 2015, 9).

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<sup>16</sup> See Ersanilli Koopmans 2010 for the variances of citizenship acquisition in the Netherlands, France and Germany, Gelekçi 2011 on the case of Belgium, Abadan et al. 2014 on the case of Germany.

Hence, in the third period of Turkey's migration history, starting with the arrival of asylum seekers fleeing from the Iranian Revolution in 1979, immigration flows into Turkey included the mass entry of Iraqi refugees in 1988, 1990 and 1991 (Kaya 2009). As immigration intensified, Turkey became a host to different types of migration including circular and over-stayer labor migrants, increasing numbers of transit and regular migrants from the neighboring regions and finally, a high number of economic migrants, especially from the former Soviet Republics (Eder 2007; İçduygu and Kirişci 2009; İçduygu and Sert 2009; Karaçay 2011; Karaçay 2015; Kaşka 2009; Kirişci 2008). This period also witnessed the arrival of ethnically Turkish migrants from Bulgaria during the Cold War period as a result of Bulgaria's negative minority policies. To add to this blend, Turkey also started receiving international students and professionals from across the globe and retirees from the western world (Balkır and Kırkulak 2007; İçduygu 2006, 71; Kaiser 2007).

Within this framework, from 1980 until the end of the first decade of 2000s, both immigration types and profiles became much diversified in Turkey including, for the first time, "foreigners" who were neither Turks nor Muslim (Erder 2000; Erder 2003; İçduygu 2014).

#### *Fourth period of international migration: intensifying immigration*

After 2010, in the fourth period, in addition to the continuing flows of regular and irregular immigrants, Turkey has witnessed huge waves of Syrian migrants in search of a safe haven due to the armed conflicts in Syria. As a result of the unexpectedly high numbers of Syrian migrants reaching over two million in 2016 and signalling permanent residence despite the state's short-term expectations, Turkey was forced to accept its new status as a migrant receiving country. In this regard, several recent improvements reveal a change in the governance of immigration. To illustrate, the issue of *Law of Foreigners and International Protection* in 2014 and the consequent establishment of *Directorate General of Migration Management* in 2015 are the first signs of admission that Turkey receives non-Turkish or non-Sunni migrants willing to settle in Turkey.

Hence, from a broader view, as a result of the massive emigration in the 1960s and 1970s and extensive immigration during the 1990s and 2000s, Turkey's position in the international migration transformed from a traditional emigration country into a both migrant sending and host country (İçduygu 2014).

## 4.2 Background for the status dimension of dual citizenship

Following the overview of Turkey's international migration space, this section will present a background for the formal status dimension of dual citizenship in Turkey with an emphasis on the historical and legal background of formal citizenship acquisition process, citizenship rights and finally, duties in the context of both emigration and immigration.

### *The status dimension in the context of emigration*

To begin with, dual citizenship first entered Turkey's legal context as a result of high emigration rates with the thinking that the tolerance of dual citizenship would facilitate emigrants' integration process in their host country concurrent with strengthening their links to the homeland (İçduygu 2006). In the year 1981, the *National Security Council* under the military government debated the first amendments to the *1964 Citizenship Law* in a secret session. Accordingly, dual citizenship was legalized with the condition that the person acquiring a second citizenship informed the government or else public authorities could withdraw her Turkish citizenship<sup>17</sup> (Keyman and İçduygu 2003; Uluocak 1983, 19).

Furthermore, according an amendment of the *Article 23/III (Law No. 2383)*, individuals could be released from Turkish citizenship if they wished to acquire the citizenship of another country that did not permit dual citizenship (Kadirbeyoğlu 2012, 4). In those cases, as supported and encouraged by the Turkish authorities, many individuals who acquired a host country citizenship reacquired their Turkish citizenship immediately after renouncing it (Kadirbeyoğlu 2012, 4). This became an official method to circumvent especially the German Citizenship Law, which prohibited dual citizenship (Kadirbeyoğlu 2012, 4). Thus, Turkish Citizenship Laws responded to more than only domestic concerns and made new arrangements in response to citizenship laws elsewhere (Kaya 2012a, 168)<sup>18</sup>.

Following the developments after the legalization of dual citizenship in the context of emigration, *Article 66 of the 1982 Constitution* put into effect during the military regime

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<sup>17</sup> This amendment also paved the way for gender equality in the transfer of citizenship to children so that women could also transfer their citizenship to their children through *ius sanguinis*.

<sup>18</sup> After 2000, however, the new German citizenship law made it possible to withdraw German citizenship from those who had taken up another citizenship following their naturalization in Germany (Kadirbeyoğlu 2012, 4). Hence, Turkish emigrants encouraged by the Turkish authorities to reacquire Turkish citizenship following naturalization in Germany lost their German citizenships and had to continue their stay in Germany through permanent residence permits (Kadirbeyoğlu 2012, 4).

stated that, the children of fathers and mothers who are Turkish citizens are Turkish citizens regardless of birthplace. Thus, children born to Turkish emigrants were granted Turkish citizenship upon birth. To continue, as for the *1964 Citizenship Law*, the existence of several amendments leading to inconsistencies (Aybay 2008, 81) and the need to respond to current circumstances, such as harmonizing the law with the *European Convention on Nationality*, forced its replacement by a new citizenship law (*Law No. 5901*) in 2009 (Kadirbeyoğlu 2012, 1).

Today, the *Citizenship Law of 2009*, as the key document concerning citizenship acquisition, regulates the acquisition and loss of Turkish citizenship through the *Regulation on the Implementation of the Turkish Citizenship Law*. Based on the principle of *ius sanguinis*, children of Turkish mothers or fathers are Turkish citizens regardless of their birthplace. Furthermore, the most significant changes brought by the *2009 Citizenship Law* regarding the Turkish emigrants abroad concern the articles on male citizens who did not serve in the military and emigrants who acquired another citizenship without informing the Turkish authorities. While these two acts were punishable in the *1964 Citizenship Law* by the withdrawal of Turkish citizenship, the *2009 Citizenship Law* eliminates the risk of citizenship loss in these cases. Hence, currently, emigrants who receive another citizenship do not need to inform the Turkish authorities with regards to their dual citizenship. In light of these developments in the context of Turkey, overall, the dual citizenship legislation concerning emigrants has softened in a period of thirty years.

Apart from the issue of dual citizenship, an important expansion of rights in the emigration context is the extension of citizenship rights to non-citizens. A major amendment to the Turkish Citizenship Law in 1995, the “blue card” (pink card before 2009) operates as the privileged non-citizen status for emigrants. In cases where host countries do not tolerate dual citizenship, as in the German case, this status permits blue card holders to reside, acquire property, receive inheritance, operate businesses and work in Turkey like any citizen of Turkey except the right to vote in elections. In 2004, the retention of attained social security rights to those who asked to be released from citizenship and employment in the public sector were also allowed for blue card holders (Kadirbeyoğlu 2012). Here, it should be noted that this amendment was not intended to include the minorities who left Turkey before 1981 (Kadirbeyoğlu 2012) or those that lost their Turkish citizenship due to the lack of permission from the Turkish authorities (Uluocak 1983). Instead, this privileged non-citizen status was specifically designed for Turkish labor emigrants who acquired Turkish

citizenship by birth and relinquished it after being granted permission by the *Council of Ministers* due to a host state's refusal of dual citizenship. Overall, the blue card extends substantive citizenship rights without formal citizenship status (Çağlar 2004, 300). However, due to the ambiguity of this status in Turkey and complications in the implementation of the blue card, the aim of increasing host country citizenship through the blue card may not have been achieved (Çağlar 2004, 287; Kadirbeyoğlu 2009).

With regards to citizenship rights and duties constituting the formal status in the context of emigration, several elements draw attention. Concerning rights, on the one hand, the Turkish state traditionally gave prominence to dual citizens' political participation and social security. Among citizenship duties in the context of emigration, on the other hand, military service and taxation received the state's interest in relation to dual citizens.

To begin with the right of political participation, as will be explained in more detail in the next section, political participation of Turkey's citizens registered as residing abroad was made possible for the first time in 1987 through an amendment of the *Law on Elections and Electoral Registers (Law No. 298/1961)*. Due to practical complications since then, external voters were able to cast their votes from abroad for the first time in 2014. Still, despite that official actions to solve problems of external voting were either slow or non-existent, these attempts in the facilitation of emigrants' involvement in Turkey's politics demonstrate Turkey's positive stance towards emigrants' right of political participation (Kadirbeyoğlu 2007, 142).

The second citizenship right in relation to dual citizens concerns emigrants' social security rights. In this regard, bilateral social security agreements were signed with 30 countries allowing the portability of social rights among countries<sup>19</sup>. However, no information was found on emigrants' practices in relation to their social security rights and whether social security rights are hindered in any way by dual citizenship.

With regards to citizenship duties, to start with the conscription of dual citizens into military service in Turkey, the *1964 Citizenship Law* stated that not serving in the Turkish military was a valid reason for the withdrawal of citizenship. A softer legislation on military

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<sup>19</sup> Albania, Austria, Azerbaijan, Belgium, Bosnia and Herzegovina, Czech Republic, Denmark, France, Georgia, Croatia, Holland, England, Sweden, Switzerland, Italy, Cyprus, Canada, Montenegro, Quebec, Republic of Korea, Libya, Luxembourg, Hungary, Macedonia, Norway, Romania, Serbia, Slovakia, Tunisia. [www.mfa.gov.tr/yurtdisinda-yasayan-turkler\\_tr.mfa](http://www.mfa.gov.tr/yurtdisinda-yasayan-turkler_tr.mfa)



service concerning dual citizens appeared in 1992 (*Law No. 3802*), approximately ten years after dual citizenship was officially accepted (Ekşi 2001, 64). Directed solely at the Turkish emigrants abroad, the *First article* of *Law 3802* identifies two categories of male emigrants who are not required to serve in the Turkish military. While the first category is foreign born Turkish nationals who reside in another country, the second category is those who migrated abroad before 18 years of age, received host country citizenship and resided abroad since then. Male citizens in these two categories, can serve in the military until the age of 38 upon their wish (Ekşi 2001, 36). According to this thinking, instead of imposing the duty of military service on male emigrants, the Turkish legislation prioritizes the primary residence country in terms of superior drafting rights as common across the globe.

Moreover, if migrants served in another country's military, their military service is accepted by the Turkish state upon application to a consulate and communication with the military office they are registered to in Turkey (Ekşi 2001, 37). According to *Article 6*, the list of countries where Turkey will accept migrants' military service is to be decided by the *Ministry of Defense* based on the opinion of *Ministry of Interior and Foreign Affairs* (Ekşi 2001, 37). Nevertheless, despite the lack of any bilateral agreements with these receiving countries, Turkey accepts migrants' military service in Germany, Netherlands, Belgium, France, Austria, Finland, Denmark, Israel, Sweden, Sweden, Switzerland, Italy and Norway even if they served alternatively in non-governmental organizations due to their preferences (Ekşi 2001, 38). *Article 11* states that these citizens may still be called for service, except in times of peace. This one sided acceptance of emigrants' military service in foreign countries demonstrates Turkey's open will to facilitate Turkish emigrants' return to Turkey.

In spite of these facilitations, legal amendments reveal the security dimension and the state concern over emigration solely to avoid conscription in Turkey. To illustrate, legal additions made in 1993 emphasize that if a male Turkish citizen migrated after the age of 18 when he is eligible to fulfill this duty in Turkey and served in another military, this service will not be accepted by the Turkish state (Ekşi 2001, 35). Likewise, revealing the state's security concerns over the issue, if a male Turkish citizen migrated after starting their military service in Turkey, their military service is not considered complete (Ekşi 2001, 42). In parallel, first, those who served in the military of a country Turkey is at war with and do not respond to the Turkish state's call for military service and second, those who served in countries where military service is not obligatory, will still be expected to serve in the Turkish military (Ekşi 2001, 43).

The second citizenship duty that receives state attention in the context of emigration is dual citizens' taxation. To overcome the risks of dual taxation of dual citizens, Turkey signed bilateral agreements against double taxation with a total of 84 countries<sup>20</sup>. However, no information was found on emigrants' practices in relation to their taxation duty and whether dual citizenship brings forward the challenge of dual taxation in the context of Turkey.

Hence, citizenship rights of political participation and social security and the duties of military service and taxation received the state's attention with regards to dual citizens in the context of emigration. Next, the same aspects the formal dimension will be assessed in the context of Turkey's immigration space.

### *The status dimension in the context of immigration*

In the context of immigration in Turkey, before the shift in the state attitude concerning Turkish emigrants and their dual citizenship in 1981, dual citizenship was already acceptable for foreigners who wanted to acquire Turkish citizenship (Tiryakioğlu 2006). Without necessitating the renouncement of previous citizenship, dual citizenship was permitted for aliens at a time when Turkish citizens were not allowed to acquire dual citizenship without informing the authorities (Tiryakioğlu 2006). As will be explained below, in contrast to the facilitation of dual citizenship in the context of emigration, the *Citizenship Law of 2009* made dual citizenship more difficult for immigrants.

Prior to the dual citizenship situation for immigrants, an introduction to the impacts of the *Citizenship Law of 2009* on immigrant' citizenship acquisition in Turkey is necessary to shed light on the context of immigration. The current citizenship law puts forward two broad principles concerning the change of status, namely *ex lege* and by a decision of the

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<sup>20</sup> United States, Germany, Albania, Australia, Austria, Azerbaijan, United Arab Emirates, Bahrain, Algeria, Bangladesh, Belarus, Belgium, Bosnia and Herzegovina, Bulgaria, Czech Republic, China, Denmark, Indonesia, Estonia, Ethiopia, Finland, France, South Africa, South Korea, Georgia, India, Croatia, Netherlands, United Kingdom, Ireland, Spain, Israel, Iran, Sweden, Switzerland, Italy, Japan, Kazakhstan, Kyrgyzstan, Qatar, Kuwait, Cyprus, Latvia, Lebanon, Lithuania, Luxembourg, Hungary Macedonia, Malaysia, Malta, Egypt, Mongolia, Moldova, Norway, Uzbekistan, Pakistan, Poland, Portugal, Romania, Russia, Saudi Arabia, Serbia-Montenegro, Singapore, Slovakia, Slovenia, Syria, Sudan, Tajikistan, Thailand, Tunisia, Jordan, Yemen, Turkmenistan, Ukraine, Oman, New Zealand and Greece. [www.gib.gov.tr/fileadmin/mevzuatek/ULKELER\\_LIST.htm](http://www.gib.gov.tr/fileadmin/mevzuatek/ULKELER_LIST.htm)

authorities<sup>21</sup>. In the *ex lege* acquisition rule of the *2009 Citizenship Law*, children born in Turkey to non-Turkish citizens receive Turkish citizenship only if they cannot acquire the citizenship of their parents through a *jus soli* exception to avoid statelessness.

Secondly, receiving Turkish citizenship through the decision of authorities includes two acquisition types in linkage to immigrants<sup>22</sup>. The first mechanism in this category is regular naturalization regulated by the *Article 10* of the *Citizenship Law of 2009*. Accordingly, the requirements for immigrants' citizenship application are uninterrupted residence in Turkey for five years, demonstration of the intention to settle in Turkey, not having a disease that might threaten public health, responsible behavior in society, garnering trust and not having bad habits contrary to societal values, Turkish knowledge enough to get by in daily life, employment or revenue to support herself and dependents and finally, not threatening national security and public order (*Article 11*). Here the demonstration of the intention to settle in Turkey can be through real estate acquisition, business establishment, investment, transfer of office to Turkey, employment in Turkey, acquisition of a work permit or a similar document, marriage with a Turkish citizen, application for naturalization as a family, having family members already naturalized in Turkey and finally, completion of education in Turkey (*Article 15 of the Regulation*).

Within this frame, migrants' citizenship acquisition process in Turkey has a "discretionary nature" (Kadirbeyoğlu 2012, 6). To illustrate, several conditions required for migrants' citizenship acquisition in Turkey, including conformity with the values of Turkish society and not constituting a threat to national security are ambiguous and open to interpretation (Kadirbeyoğlu 2013, 7). Furthermore, citizens of some countries may be asked to relinquish their previous citizenship. Here, even though *Article 11* states that the *Council of Ministers* is in charge of determining the list of countries whose citizens will have to relinquish their previous citizenship, no such list has been announced openly, adding to the vagueness of the mechanism. In addition, despite the fulfillment of all the requirements in the *Article 15* of the *Regulation on the Implementation of the Turkish Citizenship Law*, the final decision of a foreign migrant's citizenship acquisition is made by the *Council of State*,

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<sup>21</sup> Apart from *ex lege* and the decision of authorities, citizenship acquisition can take place through option. According to *Article 34* of the Regulation, children who lost their Turkish citizenship when their parents renounced their citizenship can choose to reacquire their citizenship within three years of reaching adulthood.

<sup>22</sup> Apart from these two types of citizenship acquisition in this category of naturalization, *Article 13* and *14* focus on the reacquisition of Turkish citizenship for those who lost or chose to give up their Turkish citizenship.

which justifies the discretion through state sovereignty (Aybay 2008, 121). At this point, it should be emphasized that previous to the year 2009, a foreigner could acquire Turkish citizenship by a decision of the *Council of Ministers* with no extra conditions (Tiryakioğlu 2006). In contrast, after 2009, a citizenship applicant fulfilling all the necessary criteria is conditionally accepted for Turkish citizenship because the *Ministry of Interior* can decide on any additional requirement (Kadirbeyoğlu 2012)<sup>23</sup>.

Besides regular naturalization, the second naturalization type in the category of citizenship acquisition through the decision of authorities is the exceptional, achievement-based acquisition in the current Citizenship Law. This mechanism is valid for foreign migrants who serve Turkey in the fields of science, technology, economics, sports, arts or those who invest in Turkey based on *Article 12* without having to fulfill the residency requirement. The exceptional acquisition, hence, is not expected to function as a frequent type of citizenship acquisition among immigrants.

Following this overview of the legal background concerning citizenship acquisition for immigrants, an assessment of citizenship practices on the ground is at place here. To start with, the official information on Turkish citizenship acquisition is highly limited. According to the official website of *General Directorate of Civil Registration and Nationality*<sup>24</sup>, a migrant should apply for citizenship at the governorship in the province of residence with a citizenship application form<sup>25</sup> along with other documents<sup>26</sup>. The *Provincial Governorship* then sends the migrant's citizenship application documents to the *General Directorate of Population and Citizenship Services*. According to the official website, the process should be concluded "within a reasonable time period" given that a migrant's application documents

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<sup>23</sup> This was also a political reaction to the German Citizenship Law, which required renunciation of previous citizenship for those applying to acquire German citizenship (Kadirbeyoğlu 2009).

<sup>24</sup> [www.nvi.gov.tr/Hizmetler/Vatandaslik](http://www.nvi.gov.tr/Hizmetler/Vatandaslik)

<sup>25</sup> These application forms may be in the categories of birth abroad, citizenship based on birth in Turkey, general acquisition of citizenship, exceptional acquisition of citizenship, regaining Turkish citizenship, acquisition of citizenship through marriage, acquisition of citizenship through adoption (by Turkish citizens), dual citizenship application (for Turkish citizens, only to inform the authorities). [www.nvi.gov.tr/mevzuat.5901\\_formlar.html](http://www.nvi.gov.tr/mevzuat.5901_formlar.html)

<sup>26</sup> These include the passport or identity card confirming the original citizenship, birth certificate or family registration document demonstrating family relations, a civil status document, a health report, documents for proof of Turkish knowledge, income to demonstrate self sufficiency and five years of uninterrupted residence in Turkey, six months of residence permit valid after the citizenship application, a name equivalence form which confirms that the applicant has original and Turkish names and surnames. Even in cases where the applicant prefers to hold the original name, the name is re-written in according to Turkish pronunciation.

are complete. However, no further information is provided on the process, creating the impression that a citizenship application consists solely of document submission to the authorities.

Further research on the existing legislation reveals that citizenship acquisition of foreign migrants is actually a highly complex process. Based on the *Regulation on the Implementation of the Turkish Citizenship Law* numbered 27544 and dated April 2010, in the aftermath of a migrant's citizenship application to a *Provincial Governorship*, the *Provincial Directorate of Security* initiates a detailed security check which assesses, apart from the migrant's means of residence in Turkey, whether the applicant may "constitute a national security threat" and is of "good morality" (*Article 18*). Moreover, for citizenship applications through marriage with a Turkish citizen, the *Directorate of Security* also checks whether the couple lives as a family and that sex work, in a mode that may risk the family unity, does not take place (*Article 28*). According to unofficial sources, this security check may include house visits by police officers to examine whether a migrant's marriage with a Turkish citizen is genuine. Following the completion of the security check, the *Directorate of Security* sends the application back to the *Provincial Governorship*, which then directs the application to the *Provincial Citizenship Assessment and Research Commission* that gathers solely to conduct citizenship interviews with applicants (*Article 28*).

Next, with the aim to assess whether a migrant's application criteria for citizenship are met, the *Provincial Citizenship Assessment and Research Commission* interviews the applicant to find out whether the citizenship criteria are met and to understand the applicant's descent, proficiency of Turkish, means of livelihood and adaptation to the Turkish society (*Article 19*). In the case of citizenship applications through marriage, the *Commission* also meets separately with the Turkish spouse to assess whether the marriage is made solely for the purpose of citizenship acquisition (*Article 29*). Upon a positive decision, the migrant's application is directed to the *Ministry of Interior* for a final decision on whether the applicant should be granted citizenship. If not, the applicant can reapply to the governorship in the province of residence<sup>27</sup>. According to information gathered from several governorship websites, *Provincial Citizenship Assessment and Research Commission* may include officers from the high ranks of *Gendarmerie* and *Provincial Directorates of Security, Population and Citizenship Services and National Education*. Here, this selection of *Committee* members by

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<sup>27</sup> [www.nvi.gov.tr/sik\\_sorulan\\_sorular,sorular.html?pageindex=11](http://www.nvi.gov.tr/sik_sorulan_sorular,sorular.html?pageindex=11).

the *Population and Citizenship Services* reveals a security-based approach to citizenship applicants.

Adding to the covertness of the process, it should be emphasized that no specific legislation is available concerning the *Provincial Citizenship Assessment and Research Commissions'* citizenship interviews with migrants. Thus, the long list of criteria to be assessed during the interview, ranging from the applicants' adaptation to Turkish society, proficiency of Turkish, good morals and in cases of marriage, whether the marriage is genuine, are left entirely to the Commission members with no apparent legal question format.

Against this background, in parallel with the section on the context of emigration, the state's approach to rights and duties will be assessed in the context of immigration. In this regard, the state's dissimilar attitudes in the contexts of emigration and immigration are on center stage.

To begin with immigrants' right of political participation, this subject matter did not generally receive attention before the mass and permanent migration of Syrian nationals in the fourth period of international migration in Turkey. As will be explained in detail in the next section, with the wave migration, the subject turned into a politicized source of debate within the framework of integration of non-citizens in Turkey. Turkish citizens are highly polarized in their views towards Syrians (Altındağ and Koşal 2017). In broad brushes, AKP supporters are less negative about the impacts of Syrian nationals on the Turkish population, economy and national security and more sympathetic towards providing government services to the refugees while non-AKP voters highly criticize the presence of Syrian migrants in Turkey (Altındağ and Koşal 2017). In this context, despite that migrants' presence and the state services provided for them represent a major and daily source of debate among the opposition and ruling parties, the debates revolve around the political participation of Syrian nationals rather than the possibility of dual voting by migrants.

Secondly, in the area of social security rights, among the 30 countries with which bilateral social security agreements were signed to allow the portability of social rights among countries<sup>28</sup>, the only sending country under focus in this study is Georgia. Hence,

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<sup>28</sup> Albania, Austria, Azerbaijan, Belgium, Bosnia and Herzegovina, Czech Republic, Denmark, France, Georgia, Croatia, Holland, England, Sweden, Switzerland, Italy, Cyprus, Canada, Montenegro, Quebec, Republic of Korea, Libya,

despite the high number of countries with which Turkey signed bilateral social security agreements, sending countries to Turkey do not have the same weight with migrant receiving countries. In this regard, one can make the conclusion that the portability of social security rights of immigrants who receive Turkish citizenship remains in the dark. Here, no information was found on the official practices in relation to how social security rights function in the context of immigrants who maintain dual citizenship in Turkey.

To continue with the citizenship duties in the immigration context, immigrants who receive Turkish citizenship are obliged to serve in the military. According to the Law on Conscription, those who acquire Turkish citizenship are obliged to serve in the military based on their age and level of education at the time of citizenship acquisition same with Turkish citizens. Upon request, their obligation to serve in the military may be adjourned for two years. Those who are able to provide documents to prove that they already served in the militaries of their origin countries do not need to serve in the Turkish military<sup>29</sup>. Hence, the risk of dual military obligations is eliminated in the law.

As for the citizenship duty of tax payment, among the 84 countries that Turkey signed bilateral agreements with against double taxation, ten sending countries under focus in this study are also present<sup>30</sup>. These migrant sending countries to Turkey include Azerbaijan, Bulgaria, Georgia, Germany, Iran, Russia, Syria, Turkmenistan, Ukraine and finally Uzbekistan. The only major sending country under attention in this research with which Turkey has no official agreement on dual taxation is Iraq. Hence, in terms of international agreements with sending countries, the duty of taxation has received more state attention than the right of social security. In this regard, a sharp contrast between the weight

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Luxembourg, Hungary, Macedonia, Norway, Romania, Serbia, Slovakia, Tunisia. [www.mfa.gov.tr/yurtdisinda-yasayan-turkler .tr.mfa](http://www.mfa.gov.tr/yurtdisinda-yasayan-turkler.tr.mfa)

<sup>29</sup> <http://www.msb.gov.tr/Content/Upload/Docs/askeralma/1.3.1111.pdf>

<sup>30</sup> United States, Germany, Albania, Australia, Austria, Azerbaijan, United Arab Emirates, Bahrain, Algeria, Bangladesh, Belarus, Belgium, Bosnia and Herzegovina, Bulgaria, Czech Republic, China, Denmark, Indonesia, Estonia, Ethiopia, Finland, France, South Africa, South Korea, Georgia, India, Croatia, Netherlands, United Kingdom, Ireland, Spain, Israel, Iran, Sweden, Switzerland, Italy, Japan, Kazakhstan, Kyrgyzstan, Qatar, Kuwait, Cyprus, Latvia, Lebanon, Lithuania, Luxembourg, Hungary Macedonia, Malaysia, Malta, Egypt, Mongolia, Moldova, Norway, Uzbekistan, Pakistan, Poland, Portugal, Romania, Russia, Saudi Arabia, Serbia-Montenegro, Singapore, Slovakia, Slovenia, Syria, Sudan, Tajikistan, Thailand, Tunisia, Jordan, Yemen, Turkmenistan, Ukraine, Oman, New Zealand and Greece. [www.gib.gov.tr/fileadmin/mevzuat/ULKELER\\_LIST.htm](http://www.gib.gov.tr/fileadmin/mevzuat/ULKELER_LIST.htm)

of social security rights and taxation is visible in the comparison between rights and duties in Turkey's immigration space.

### **4.3 Background for activity and identity dimensions of dual citizenship**

Following the status dimension of citizenship that includes the citizenship acquisition process, citizenship rights and duties, this section aims to present a background for the activity and identity dimensions of dual citizenship in Turkey. Here, the dimension of activity comes forth as more dominant in the context of emigration while the citizenship dimension of identity is more visible in the context of immigration.

#### *The activity and identity dimensions in the context of emigration*

In the context of Turkey's emigration space where the dimension of participation is dominant in the state approach, an evolution from the emphasis of migrants' economic participation to political participation marks the context of emigration. In line with this, state views towards Turkish emigrants abroad transformed widely in time (Artan 2009; Bilgili and Siegel 2011).

To begin with, Turkey's emigration policy was linked to a First Five-year Development Plan (1962-1967), which manifests the "export of surplus labor power" as a crucial tool for development (İçduygu 2014, 20). Following the waves of Turkish labor migration starting from 1960s and the consequent realization that Turkish migrants are not likely to return to Turkey, which brought forward the toleration of dual citizenship; emigrants' economic participation in Turkey constituted a major subject. Migrants' remittances and direct investments drove the Turkish governments to search for ways to strengthen their links with Turkish nationals abroad (Faist 1998, 213). Hence, as the state approached the emigrants as part of a strategy to reduce unemployment rates and utilize the inflow of remittances to improve the Turkish economy in the first years of the labor emigration, economic participation dominated other forms of participation.

With the first signs of Turkish permanent settlement in Europe in the 1980s, the focus on emigrants' economic participation and the weight of economy in the emigration policy were slowly replaced with measures in the direction of political participation (İçduygu and Aksel 2013). Gradually, the integration of migrants in host countries for which naturalization was received as an effective tool, became a state concern (İçduygu and Sert 2010).



Accordingly, through emigrants' citizenship acquisition in the receiving states, a higher degree of integration could be achieved simultaneously with increasing their potential contributions to Turkey's development (İçduygu and Sert 2010)<sup>31</sup>.

With the evolution from the emphasis on economic participation to political participation in the context of emigration, following the tolerance of emigrants' dual citizenship, an amendment of the *Law on Elections and Electoral Registers* made electoral participation for Turkey's citizens registered as residing abroad possible for the first time in 1987 (*Law No. 298/1961*). At this stage, as citizens residing abroad could only vote at the polling stations located at the borders and needed to travel to Turkey to cast their votes, external voting generally did not function well (Abadan-Unat et al. 2014, Okyay 2014). In 1995, an amendment to the *Article 67* of the *1982 Constitution* gave this right a constitutional basis and moreover, allowed citizens to vote while they are still abroad (no. 4121). In spite of this amendment, in the four general elections from 1995 to 2007, voting at the border still remained as the only method due to legal and practical obstacles (Abadan-Unat et al. 2014).

Finally, in the presidential elections of 2014, external voters were able to cast their votes from abroad for the first time. However, the challenges in the election system ranging from the usage of computers to problems of registration, logistical costs of traveling to the election site, distrust in the election system and problems with the timing of the elections led to a low turnout rate (approximately 19 percent) in the Presidential Elections of 2014 (Abadan-Unat et al. 2014)<sup>32</sup>. Still, the large political campaign tours across Europe and services offered to the voters to facilitate their participation in the elections demonstrate Turkey's encouragement of dual citizens' political participation<sup>33</sup>. Apart from the right of external voting, it should be added that, according to *Article 93* of the *Turkish Civil Law*

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<sup>31</sup> The headlines for project funding also demonstrates this aim to maintain and strengthen links with emigrants and promote their rights in host countries. The *Prime Ministry of Republic of Turkey Presidency for Turks Abroad and Related Communities* funds projects under *Fighting Discrimination Program, Active Citizenship and Equal Participation Program, Justice for All, Bilingual Education Support Program, Education and Academic Support Program, Cultural Studies Support* and finally, *Family and Social Studies*.

<sup>32</sup> A total of 530,135 citizens of Turkey, registered as external voters, cast their votes in Turkey's presidential elections in August 2014. More than those who voted in their country of residence (232,795) were those who voted at the polling stations at the borders (297,340) (Abadan-Unat et al. 2014).

<sup>33</sup> Most political parties offer transportation services for voters abroad.

[http://www.bbc.com/turkce/haberler/2015/10/151022\\_yurtdisi\\_oylar](http://www.bbc.com/turkce/haberler/2015/10/151022_yurtdisi_oylar)

(*Law No. 4721*), Turkish emigrants including those who received the citizenship of their host state have the right to be a member of and form associations in spite of their resettlement abroad.

Concerning the identity dimension of citizenship, the state's emphasis on national and religious identity becomes apparent in the post-1980 period. At this stage, state engagement with emigrants increased in the areas of education and culture (Ünver 2013). Within this context, the *Ministry of Education and the Directorate of Religious Affairs* sent “minor armies of Turkish teachers and *imams*” to the host countries (Østergaard 2003). On the one hand, Turkish teachers were sent to Germany with the intention to teach language, history and politics to Turkish children (Østergaard 2003). On the other hand, *imams* served the mosques in Europe to accommodate the religious needs of emigrants (Østergaard 2003). In this regard, Turkey's relationship with its citizens abroad can be defined along the lines of first, through language and hence ethnicity, and second, religious identity.

Hence, Turkey's relationship with its emigrants is chronologically dominated by, first, economic participation and second, by political participation. Moreover, in terms of identity, the state perceives national and religious identity as the major linkages with emigrants abroad.

#### *The activity and identity dimensions in the context of immigration*

Dissimilar to the case of Turkish emigrants abroad, in the context of immigration, not the dimension of participation, but the ethnicity aspect of identity is dominant. Rooted in the historical context of Turkish citizenship, Turkey traditionally places great weight on immigrants' identity in the processes of citizenship acquisition and integration. In this section, following the historical and legal background, the focus will be on the weight of identity and participation in the current citizenship process in the context of immigration.

First and foremost, Turkey's first constitution (1924) granted Turkish citizenship to all residents of the Republic irrespective of race or religion (*Article 88*). In the first Citizenship Law, accepted in 1928, citizenship acquisition was based on *ius sanguinis*, complemented by a territorial understanding (İçduygu et al. 1999, 193). However, both Turkish ethnicity and Hanefi Sunni religion were required to enjoy full citizenship rights (Çağaptay 2004; Erder 2000; Kirişci 2000, 1). In line with this, minorities such as Armenians and Greek Orthodox – who had left the country during the war of independence and had not returned since, were excluded from citizenship in 1927 (Çağaptay 2003, 605). In addition,

simultaneously, several laws were passed as part of a homogenization strategy in the 1920s and 30s which rendered employment impossible for minority members and forced many to leave Turkey strengthening the Sunni Turkish profile of the new Turkish citizen (Cağaptay 2003, 603).

Thus, constructed during the nation-building process, Turkish citizenship is marked by an ambiguity due to the simultaneous existence of both ethno-centric and civic republican understandings of citizenship (Keyman and Kancı 2011). Consequently, the ethno-centric understanding of citizenship reflected in the construction of a Turkish national identity that included assimilation and exclusion of non-Turkish and non-Muslims (Kadıoğlu 2007). Illustrating the weight of Sunni Islam in citizenship and demonstrating an exclusivist policy towards non-Muslims, the *Law on Settlement*, adopted in 1934 to facilitate the settlement of migrants with Turkish ethnicity, allowed the entrance of non-Turkish communities of Muslim Bosnians, Albanians, Circassians and Tatars but declined to accept the settlement of Christian Orthodox, Gagauz Turks and the ethnically Turkish kin group of Shi'a Azeris in Turkey (Kirişci 2000). Thus, contrary to the official statements that only those of Turkish descent and culture would be approved, the *Law of Settlement* did not favor the non-Sunni Turks, but accepted Sunnis of other ethnicities (Kirişci 2000).

Following the footsteps of the *Law on Settlement of 1934* that openly favored ethnically Turkish migrants, the *1964 Citizenship Law* stated that immigrants of Turkish ethnicity could naturalize exceptionally without having to complete the regular requirement of five years of residence in Turkey. In the same lines, an amendment to the *Settlement Law* in 2006 defined "immigrants" as those who have Turkish ethnicity and close links to Turkish culture. Despite the fact that ethnically non-Turkish immigrants were required to reside in Turkey for five years before an application to receive Turkish citizenship, "immigrants" to Turkey could be naturalized exceptionally without having to wait for five years once their immigration procedures have been completed. Further illustrating the advantage of Turkish background and the lingering mentality of the *1934 Settlement Law*, special laws were enacted for Afghan immigrants (*Law No. 2641/1982*) and Meskhetian Turks from Russia (*Law No. 3835/1992*) (Kadirbeyoğlu 2012, 16). In line with this thinking, a *1992 Law*, which regulated the settlement of Meskhetian Turks was amended in 2009 in order to grant citizenship to all Meskhetian Turks who have a residence permit issued before January 2009 in a period of six months without having to satisfy the requirements specified in the Turkish Citizenship Law (Kadirbeyoğlu 2012, 16).

Despite this background in which Turkish ethnicity is a critical element in citizenship acquisition, the *2009 Citizenship Law* states that the residence criterion for migrants, regardless of ethnicity, is five years prior to their citizenship application. As migrants with Turkish ethnicity were obliged to reside only for two years before the year 2010, the equalization of the residence criteria for all applicants regardless of ethnicity demonstrates the state's mindset to eliminate the discrimination against non-Turks and may be interpreted as the end of Turkish ethnicity as the strongest advantage for receiving Turkish citizenship.

In line with this thinking, according to Parla (2011), the new *Citizenship Law* eliminates ethnic privilege from the citizenship acquisition process. In sharp contrast to the kin minority policy established under the Kemalist Republic, today's kin policy aims to keep Turkish minorities in their home countries rather than encouraging their settlement in Turkey (Baklacioğlu 2004, 351). The policy shift is also apparent in the decreasing attention towards the ethnic kin in the governance of the migration. In this regard, the state's current function toward the ethnic Turks in other countries remains limited to consultation and coordination under the *High Council of Nationals Abroad* (Baklacioğlu 2004, 340). The functioning of this *Council* also demonstrates the decrease in the interest towards the community. Established in 1998, the *Council* was designed to cover three main groups of communities including, first, Turkish citizens living abroad, second, immigrant communities living in Turkey and finally, the kin minorities abroad. However, in practice, the *Council* concentrated only on Turkey's citizens abroad and did not cover the other two categories (Baklacioğlu 2004, 341). In other words, Turkey's kin policy shifted its main concern from the ethnic minorities in its historical lands such as the Balkans and Central Asia to the Turkish emigrants abroad (Baklacioğlu 2004).

Along this line of thinking, the key determinant in distinguishing who qualifies as a citizen and has access to citizenship today may be considered as, rather than the former concentration on the ethnic background, migrants' social class (Parla 2011). Thus, while ethnic Turks were historically the most privileged community within the hierarchy of migrants in Turkey, the analysis of citizenship acquisitions should be broadened to include social class in order to understand the market logic behind what appears as decrease in the priority of Turkish background (Danış and Parla 2009, Parla 2011). In the context of this study, this notion appears to be closely linked with a migrant's economic participation in Turkey and whether a migrant is economically well-off.

To shed light on the weight of identity and participation in the current citizenship acquisition process, applicants' interview with the Citizenship Committee should be examined. However, little is known about the details of the citizenship interview. While the *Article 11 of the Citizenship Law of 2009* expects citizenship applicants to demonstrate their intention to settle in Turkey, have responsible behavior in society, garner trust, not have bad habits contrary to societal values, know Turkish to get by in daily life, be economically self-sufficient and finally, not threaten national security and public order, no official knowledge exists on the specifics of the interview process. Hence, state expectations on migrants' identity and activity remain mostly in dark.

According to several unofficial websites on which migrants share their experiences, interviews may include questions on whether the applicant knows about Kemal Atatürk, can recite the national anthem and the language spoken at home. Interview questions directed at the female spouses focus predominantly on house chores (such as the dinner cooked at home) and family relations (whether the applicant is fond of her mother-in-law). Hence, the element of gender identity in citizenship acquisition should not be overlooked. Questions asked during the Citizenship Committee interviews reveal that the citizenship acquisition process may be gendered in the Turkish immigration context. In this vein, questions on an applicant's activities in relation to housework and family relations signal Sirman's (2005) notion of familial citizenship where the ideal woman citizen is a wife dependent on a sovereign husband rather than an individual. Still, the lack of official information on this process hinders the understanding of the weight of identity and participation in the citizenship acquisition process.

Apart from the citizenship acquisition process, recent arrangements with regards to migrants' participation may help to shed light on the context despite the fact these concern non-citizens. Several developments signal the Turkish state's attention to immigrants' integration with regards to both political and economic participation. According to *Article 93 of the Turkish Civil Law (Law No. 4721)*, foreigners who have legally resettled in Turkey have the right to establish associations themselves and to participate as a member of an association. This, however, is not linked to dual citizenship even though it demonstrates a positive step taken for immigrants' political participation in Turkey.

With regards to economic participation of foreigners, the Turkish government started to issue work permits for Syrian refugees who have resided in Turkey for more than six months in January 2016. According to work permit regulations, employers have to apply on

behalf of employees once residency, registration, and health requirements are met with the quota that Syrian nationals cannot exceed 10 percent of the employed Turkish citizens in the same workplace (İçduygu and Şimşek 2016). In addition, with the *International Labour Force Law (Law No. 6735)* of 2016, all migrants can receive a work permit valid for one year, which will be extended with each renewed application and after eight years, they will have the right to apply for indefinite work permits. Those with indefinite work permits will have the same rights granted to Turkish citizens with the exception of the right to vote, stand for election or public service, and military service liabilities. Still, even though these steps signal a more inclusionist state approach to foreigners in general, integration policies for immigrants and the citizenship acquisition processes appear to be dissimilar.

Overall, in terms of citizenship dimensions of participation and identity, the state's attention in the emigration context is dominated by the dimension of participation, which evolved, in time, from economic to political participation of emigrants. In terms of the citizenship dimension of identity in the context of emigration, the state concentrated on maintaining national and religious ties with emigrants abroad. The state concerns in Turkey's immigration space, however, are dissimilar with the emigration context. Despite steps taken for the integration of non-citizens, in the citizenship acquisition processes, the dimension of participation is almost invisible and overshadowed by the emphasis on identity in which the aspects of ethnicity and religion are traditionally prioritized.

#### **4.4 Concluding remarks**

Turning the attention on dual citizenship to the context of Turkey, this chapter assesses the institution of dual citizenship based on the dimensions of formal status, participation and identity in Turkey's larger migration context. In the background for the study of dual citizenship, Turkey's experience of migration transition from a traditional sending to a receiving country in a period of thirty years reflects over its dual citizenship policies (İçduygu 2014). Hence, the state's different approaches to dual citizenship in the context of emigration and immigration are assessed in this chapter in a comparative manner with regards to the citizenship dimensions of formal status, participation and identity.

First and foremost, Turkey does not approach the migration and citizenship acquisition of emigrants and immigrants in a similar fashion. It should be noted that dual citizenship emerged as a part of "politics of emigration", targeting the Turkish labor migrants

in Europe (Green and Weil 2007). Here, in line with the general principles of Turkish citizenship, dual citizenship was inspired by ethno-cultural motivations and national interest (Kadirbeyoğlu 2007, 142; Kaya 2012a, 16; Mügge 2012, 32). In point of fact, before the positive shift in the state attitude concerning Turkish emigrants' holding a second citizenship in 1981, dual citizenship was already acceptable for foreigners without renouncing their previous citizenships (Tiryakioğlu 2006). However, despite that the *Citizenship Law of 2009* facilitated dual citizenship in the context of emigration, the same law made holding a second citizenship more challenging for immigrants due to a possible obligation of renouncement of their original citizenship. This divergence in the state approach based on context also reflects to the state's attention on various dimensions of citizenship for emigrants and immigrants.

To begin with the formal status of citizenship in the context of emigration, concerning citizenship rights, the Turkish state traditionally gave most prominence to dual citizens' political participation. Here, despite various practical complications since emigrants' political participation was made possible for the first time in 1987, numerous attempts to facilitate its nationals' involvement in politics demonstrate Turkey's encouragement of this citizenship right. Next to the right of political participation, social security rights of emigrants who hold dual citizenship are also protected through legal agreements with receiving states. To compare, for immigrants who hold Turkish citizenship, the right of political participation did not receive attention before the mass migration of Syrian nationals. Even then, it is not dual voting that receives attention in general, but, in a politicized mode, the tension arising from the presence of Syrian nationals in Turkey and the assumption that they may vote for the governing party. Moreover, with regards to social security rights, Turkey signed a bilateral social security agreement with only one major sending country. In light of these findings, one can make the conclusion that the rights of political participation and social security, which are highlighted by the Turkish state in the context of emigration, remain in the dark in the immigration context.

To continue with citizenship duties, military service and taxation of dual citizens received the most interest in the context of emigration. With regards to military service, Turkey excludes the possible strategy of emigration solely to avoid conscription in Turkey concurrently with legally eliminating the risk of dual military service for emigrants who hold dual citizenship. Concerning the taxation of dual citizens, while no information was found on the practices on the ground, Turkey's bilateral agreements with receiving states reveals the state attention in overcoming the risks of dual taxation of dual citizens. To compare with the

citizenship duties in the immigration context, while the risk of dual military obligations is eliminated, migrants who acquire Turkish citizenship do not appear to be summoned for military service despite the legal requirement. As for the taxation duty, Turkey signed bilateral agreements against double taxation with the great majority of sending countries. Hence, despite the lack of attention on social security rights of immigrants, the duty of taxation has a prominent place in Turkey's approach towards immigrants.

Following the status dimension of citizenship, participation in the emigration context and identity in the immigration context are the dominant dimensions of citizenship. In the first place, an evolution from the emphasis of economic participation to political participation marks the context of emigration. To continue, in the context of immigration, despite their civic-republican appearance, Turkey's citizenship practices have mostly been ethno-cultural (Kadirbeyoğlu 2007, 142). Hence, ethnic and religious aspects of identity have been traditionally more dominant in Turkey's immigration space in terms of citizenship acquisition processes even though the lack of sufficient knowledge on the current trends does not allow an analysis on the present situation.

In light of this research on the citizenship dimension of formal status, participation and identity covering the contexts of emigration and immigration in Turkey, several gaps in relation to immigration need to be studied in further detail through an empirical research that focuses directly on immigrants' dual citizenship in Turkey.

First, with regards to the citizenship dimension of formal status, little is known on the actual practices of the citizenship acquisition process, especially with regards to citizenship interviews. Neither the specific interview questions nor the Committee members' particular expectations from citizenship applicants are formally known except from the informal websites where migrants share their experiences in the citizenship processes. In this regard, the fact that *Citizenship Assessment and Research Commission's* work remains unknown creates a major limitation in the understanding of the formal status dimension of citizenship in the context of immigration. Secondly, due to scarce information on the subject matter, the state's focus areas in rights and duties that make up the formal status dimension of citizenship prevail in the dark. Thus, which citizenship rights and duties Turkey highlights in immigrants' dual citizenship remain unidentified. Thirdly, with regards to the dimensions of participation and identity in the context of immigration, again, existing information is limited. While the participation dimension is clearly shadowed by the citizenship dimension of identity in the context of immigration, still, the current trends in relation to identity are



unknown. Here, whether the traditional weight and prominence given to ethnicity and religion have a lingering effect on the citizenship process is yet to be concealed. Likewise, the gender dimension of citizenship acquisition in Turkey remains unexplored.

Finally, in direct relation with the core of this research, no information was found specifically on the countries with which Turkey does not tolerate dual citizenship. Hence, this lack of information on Turkey's dual citizenship policies represents a critical gap in the study of the institution of dual citizenship in Turkey. Overall, considering these knowledge gaps, one can reach the conclusion that the formal status, participation and identity dimensions of immigrants' citizenship acquisition and their dual citizenship in Turkey's immigration context remain mostly unrevealed.



## **CHAPTER 5**

### **Paralysis of formal citizenship?**

#### **Impacts on the legal status dimension of citizenship**

A critical question in the dual citizenship literature is the impact of dual citizenship on formal citizenship and whether this institution disrupts citizenships as status. Employing Kymlicka and Norman's (2000) distinction of citizenship dimensions as its central structure, this study analyses the dual citizenship perceptions and practices in a triadic research framework that constitutes of sending and host states and migrants in the context of Turkey. The aim is to explore how dual citizenship operates and affects the traditional institution of citizenship through the content and extent of citizens' rights and obligations by relocating the attention on dual citizenship to a case beyond Western Europe and North America and taking into consideration all the actors of dual citizenship.

Concerning the course in which dual citizenship operates in relation to citizenship rights and duties and affects the formal aspect of citizenship, the existing literature on dual citizenship primarily asks whether overlapping membership to multiple political communities may harm the status dimension of citizenship. In point of fact, the question whether dual citizenship causes the paralysis of formal citizenship does not fully reflect the multiplicity and complexity of the dual citizenship institution. Despite its reductionist nature rooted in the assumption that dual citizenship functions homogeneously and independent of context in a world where all rights and duties are uniform, this question still functions as a stepping stone to broaden the study of dual citizenship.

The formal dimension of citizenship fundamentally consists of an individual's rights such as voting and diplomatic protection and duties including obedience to law, payment of taxes and finally, military obligations (Kymlicka and Norman 2000). Accordingly, first, dual citizenship may challenge the traditional institution of citizenship through dual voting and cause complications in the area of diplomatic protection, which can be discussed within the notion of rights. Secondly, dual membership may obscure citizenship duties specifically in the aspects of obedience to law (or applicability of law in cases involving dual citizens), military obligations and taxation. Assessing the perspectives of all actors of migration and dissecting the citizenship institution into its dimensions, this chapter asks whether dual

citizenship leads to a paralysis of formal citizenship through rights and duties of citizenship in the context of Turkey' immigration space.

To shed light on the impact of dual citizenship on citizenship as status, at the state level, semi-structured in-depth interviews were held with nine consulate officials from the top sending countries and seven Turkish state officials holding key offices in the migrants' citizenship acquisition process. The empirical study at the individual level includes in-depth interviews with, first, migrants with diverse migration experiences and backgrounds from Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine and Uzbekistan. Among these 72 migrants, 22 migrants hold dual citizenship with Turkey, 10 migrants are at various stages of the citizenship application process, 12 migrants hold temporary identity cards provided for Syrian nationals and finally, 26 migrants hold residence permits.

Concerning the structure of this chapter, the theme of citizenship duties is assessed prior to citizenship rights. As the enforcement of laws and migrants' dual citizenship practices on the ground are included in the duties of citizenship, the assessment of duties serves as a smooth entrance to the subject of dual citizenship as legal status. Hence, this section on the formal status dimension of citizenship tackles the question of citizenship duties before citizenship rights for practical reasons.

## **5.1 Citizenship duties**

In this study, the citizenship duties under focus are migrants' obedience to law, payment of taxes and finally, military obligations all of which may create complications in the case of overlapping membership. Within this frame, this section will take into center these three themes of duties and explore the converging and diverging practices and approaches of the three key actors in this study, namely the top sending states of Bulgaria, Germany, Iran, Iraq, Azerbaijan, Georgia, Ukraine, Uzbekistan, Russia, Syria, and Turkmenistan, the host state of Turkey and finally, migrants from the eleven sending countries.

### *Obedience to law*

In the context of dual citizenship, obedience to law as a component of citizenship primarily brings to mind whether migrants are acknowledged about the legal status of dual

citizenship and the concerned states' laws on this institution. This question requires, prior to the examination of migrant perspectives, an analysis of sending and host states' legal practices of dual citizenship. Hence, this section on the citizenship duty of obedience to law will first explore the sending states' legal practices concerning dual citizenship to be followed by an examination of host country's approach towards dual citizenship.

In relation to the assessment of sending states' regulations of dual citizenship, it is crucial to note that the official legislation in an origin country only partially discloses the dual citizenship situation in a country and official dual citizenship laws may not be in symmetry with the enforcement of these laws (Sejersen 2008, 531). Hence, the authorities' interpretation of the dual citizenship laws is as critical as the official legislation in the sending countries. While this research aims to shed light on the sending states' approaches to dual citizenship beyond their existing legislations and discover the actual practices of dual citizenship through interviews with consulate officials, a categorization of dual citizenship laws in the sending states is taken as the base<sup>34</sup>. Hence, as the starting point, the legal infrastructure concerning dual citizenship in sending countries can be distinguished as countries that (1) strictly ban dual citizenship, (2) partially allow dual citizenship and finally, (3) tolerate dual citizenship.

The first category of origin countries constitutes of Azerbaijan, Iran, Turkmenistan, Ukraine and Uzbekistan, which officially ban dual citizenship. Here, based on their legislation, Iran, Turkmenistan and Uzbekistan approach dual citizenship very strictly, to the degree of the act's criminalization while Azerbaijan and Ukraine have a considerably softer stance. In the former group, Iranian legislation puts forward that an Iranian's citizenship is withdrawn upon acquisition of another citizenship (Faist and Gerdes 2008, 18; Farrokhi 2015, 159; Sejersen 2008, 532). Likewise, Turkmenistan does not recognize dual citizenship and often forces dual passport holders to renounce their foreign citizenship (Sejersen 2008, 532; UNHCR Turkmenistan). In parallel, citizens of Uzbekistan living abroad are obliged to contact a consulate in their host country to renounce their citizenship following their foreign citizenship acquisition (OHCHR Uzbekistan, Sejersen 2008, 532; UNHCR Uzbekistan). In this first category, Azerbaijan and Ukraine are not as strict as Iran, Turkmenistan and

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<sup>34</sup> Within the framework of this study, nine consulates were interviewed. As two consulates, the consulates of Azerbaijan and Syria were reluctant to be interviewed, authorities' interpretation of the existing laws in those countries are limited to desktop research.

Uzbekistan in their practice of the ban on dual citizenship. To illustrate, despite a strict ban on dual citizenship in the case of Azerbaijan, officials underline that the acquisition of a second citizenship does not constitute a legal problem once dual citizens fulfill their responsibility of notification before their foreign citizenship acquisition (COE Azerbaijan; Faist and Gerdes 2008; Sejersen 2008; UNHCR Azerbaijan). Similarly, Ukrainian state authorities turn a blind eye to dual citizens as they are aware of frequent foreign citizenship acquisition among Ukrainian emigrants and hence, openly allow dual citizens bypass the Ukrainian legislation that disregards dual citizenship (Blatter et al. 2009; Poiedynok 2015, 112; Shevel 2013).

Based on their official legislation, the second category of origin countries constitutes of Germany, Georgia, Syria and Russia, which partially allow dual citizenship. In the case of Germany, citizens who acquire a foreign citizenship lose their German citizenship if they do not first apply for a permit to retain their original citizenship justifying the reason to maintain their citizenship link with Germany (Hailbronner and Farahat 2015; Pusch 2015, 4). The acquisition of this permit allows migrants to keep their German citizenship. Dissimilarly, Georgia's citizens automatically lose their citizenship upon acquisition of another citizenship but have the right to re-apply for Georgian citizenship through a consulate within one month and receive their citizenship anew (COE Georgia). In this regard, the retainment of Georgian citizenship following its automatic loss is a frequently practiced legal solution to bypass Georgia's ban on dual citizenship. Similar to Georgia, before they acquire a foreign citizenship, citizens of Syria are required to ask for permission to denounce their original citizenship. Following this obligatory denunciation, Syrian citizenship is regained through a request (Davis 1996; ECOI Syria; UNHCR Syria). The country most tolerant of dual citizenship in this category can be considered as Russia, which declares that a citizen can obtain a foreign country citizenship according to federal law or an international agreement of the Russian Federation. Despite its security perspective towards dual passport holders, the acquisition of another citizenship does not cause the termination of Russian Federation citizenship. Here, Russia's only legal requirement is migrants' notification of their foreign citizenship acquisition (Salenko 2012).

Finally, the category of countries that tolerate dual citizenship constitutes of Bulgaria and Iraq. Here, Bulgaria openly allows dual citizenship but considers a dual citizen only as a Bulgarian citizen in his relationship with Bulgaria (Faist and Gerdes 2008; Kadirbeyoğlu, 2009, 105; Liebich 2000; Özgür-Baklacioğlu 2006, 322; Sejersen 2008; Smilov and Jileva

2013, 11). Unlike Bulgaria, Iraqi courts apply Iraqi laws on holders of Iraqi nationality together with that of a foreign state (UNHCR Iraq). Hence, Iraq's dual citizenship legislation can be considered the most liberal among the sending countries in the scope of this research.

Thus, when the categorization is made primarily based on the official citizenship legislation, the countries which legally ban dual citizenship constitute the largest category with Iran, Turkmenistan, Uzbekistan, Azerbaijan and Ukraine. To continue, the category of migrant sending countries that partially allow dual citizenship is the second largest group with Germany, Georgia, Syria and Russia. Finally, Bulgaria and Iraq make up the smallest category as the sending countries that allow dual citizenship.

As formerly explained, however, due to the dissimilarities between the official legislations and the practices on the ground, when state authorities' interpretation of the existing legislation is taken into consideration, an essentially different scene appears. As will be assessed below, in the context of sending countries to Turkey, official legislations and their interpretations by sending state officers often diverge and point at opposite directions in the same country (See Appendix).

Based on the findings from the interviews with state officials in this empirical research, to start with the countries which officially ban dual citizenship, in Iran where the citizenship legislation declares the deprivation of Iranian citizenship upon foreign citizenship acquisition, consulate officials in Istanbul do not consider this as a legal problem and instead, accept the widespread practice of dual citizenship of Iranian citizens in Turkey<sup>35</sup>. Hence, the Consulate of Iran in Istanbul discloses a much softer stance on dual citizenship. Moreover, dual citizens are not expected to inform the Iranian authorities concerning their foreign citizenship acquisition. In this regard, despite the fact that dual citizens are considered as Iranian mono-citizens in their relationship with Iran, Iran practically accepts dual citizenship with Turkey and underlines that *“there exists no challenge against Iranian citizens who hold Turkish citizenship”*.

Likewise, in the case of Uzbekistan where the acquisition of a foreign citizenship requires the renunciation of Uzbek citizenship, officials have normalized the status of dual citizenship<sup>36</sup>. Authorities of Uzbekistan admit the high number of citizenship acquisitions

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<sup>35</sup>In-depth interview with the Iranian Consulate, September 1, 2016, Istanbul

<sup>36</sup>In-depth interview with the Consulate of Uzbekistan, September 2, 2016, Istanbul

among their nationals residing in Turkey and do not consider this common practice as an issue. Here, a consulate official emphasized that a migrant's dual citizenship would never come to the attention Uzbekistan authorities under normal circumstances and due to this, that the obligatory renunciation of Uzbek citizenship in cases of dual citizenship cannot be exercised. The consulate official underlined that as the Uzbek state is unaware of dual citizenship, "*migrants take their decisions according to their own benefits*" and "*manage their own citizenship*".

In the same category, authorities of Azerbaijan only require the notification of foreign citizenship acquisition despite the citizenship legislation that calls for the automatic loss of Azerbaijani citizenship. Due to the fact that the Consulate of Azerbaijan in Istanbul was reluctant to have an interview, further knowledge on authorities' interpretation of Azerbaijan's dual citizenship legislation remains unavailable. Still, based on desk research, the official discourse presents a more liberal approach in comparison to the legislation, demonstrating a comparatively soft profile. To illustrate, an interview with the *Chairman of the Azerbaijani Parliament's Committee on Law, Policy and State Building* in 2014 does not reflect the same strictness concerning the prohibition of dual citizenship<sup>37</sup>. In this interview, the Chairman underlines that while dual citizens' lack of notification is a violation of law, "*it is positive that compatriots living in foreign countries obtain citizenship taking part in business, social and political life of those countries*". Thus, one may conclude that once dual citizens fulfill their responsibility of notification before the acquisition of a second citizenship, dual citizenship is not considered a problem in the case of Azerbaijan.

To continue with the category of countries that ban this legal status, Ukrainian officials accept the common practice of dual citizenship and openly state that they prefer to ignore when their citizens take up Turkish citizenship in order to bypass the legal ban on foreign citizenship acquisition<sup>38</sup>. Still, two opposite perspectives mark the issue (Poiedynok 2015). In the first perspective, which is state and security oriented, the aim is to prevent the cases of dual citizenship (Poiedynok 2015). In the second perspective, which is more individual-oriented, dual citizenship is regarded as part of an objective reality in linkage to Ukraine's position as an emigration country (Poiedynok 2015). Within this frame, the

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<sup>37</sup> "Azerbaijan does not allow dual citizenship", News. Az., May 30, 2014, <http://news.az/articles/politics/88944> [accessed 12 August 2016]

<sup>38</sup> In-depth interview with the Ukrainian Consulate, May 11, 2016, Istanbul

perspective of the Ukrainian Consulate in Istanbul is in line with the second approach to dual citizenship. According to the Consulate, the state view of dual citizenship through the security lens is outdated and isolated from the reality of the contemporary world. Even though Ukrainian citizens are expected to notify the state, however, the Consulate has the opinion that emigrants, mostly Ukrainian women married to Turkish men, rarely enter this procedure. Thus, the common practice is hardly in line with the legislation. As part of the state strategy to turn a deaf ear to this issue, the Ukrainian Consulate does not expect migrants to provide information on their Turkish citizenship status for passport renewal. To illustrate, for the renewal of emigrants' passports, the consulate only requires documents that give no hints on their residence status in Turkey to deliberately avoid learning about migrants' possible dual citizenship. Thus, the information received from the consulate highlights the discrepancy between the official citizenship legislation and the practice on the ground.

Hence, the only country in this category of sending countries that ban dual citizenship where the officials' discourse is in line with the existing legislation is Turkmenistan<sup>39</sup>. In this case, consulate officials underline that the renunciation principle is enforced and that citizens of Turkmenistan who take up Turkish citizenship renounce their original citizenship. While the consequences of not going through this procedure are left unclear, the Consulate notes migrants' right to re-acquire the citizenship of Turkmenistan upon residence in Turkmenistan by officially proving the renunciation of the second citizenship.

Next, the category of countries that partially tolerate dual citizenship includes Germany, Georgia, Russia and Syria. In this category of sending states to Turkey, German authorities' interpretation of the laws is in line with the existing legislation<sup>40</sup>. Hence, migrants' request to maintain German citizenship upon taking up Turkish citizenship makes their dual citizenship possible. The consulate in Istanbul distinguishes three distinct categories of those German citizens who apply for Turkish citizenship and still want to retain German citizenship. The first category is the Turkish nationals born and raised in Germany who settle in Turkey because they do not feel belonging towards Germany and would like to take their chance in Turkey. Due to the lack of experiences in Turkey, these young and mostly male migrants wish to maintain German citizenship as an exit option. In the second

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<sup>39</sup> In-depth interview with the Consulate of Turkmenistan, August 31, 2016, Istanbul

<sup>40</sup> In-depth interview with the German Consulate, May 3, 2016, Istanbul



category of German citizens interested in dual citizenship are the German spouses of Turkish nationals. Most often, following a marriage in Germany, a German spouse comes to Turkey only to find out that she is unable to find a permanent, stable job without holding Turkish citizenship. Concurrently, German citizenship guarantees the return home in case the couple decides Germany is a better place to live. Most often, the first and second categories of German migrants are allowed to maintain their German citizenship and become dual citizens. Migrants in the third category, however, are frequently refused to retain their German citizenship. This third category constitutes of those refugees who left Turkey to seek for asylum in Germany and Turkish labor migrants who in time, received citizenship, but later returned to Turkey. As German citizenship no longer seems necessary for these migrants except for its practical advantages, German officials refuse their applications to maintain their German citizenship. Hence, dual citizenship is not possible for those who cannot justify the reasons behind the wish to maintain their German citizenship. As Germany allows dual citizenship for those who are able to demonstrate their need to maintain German citizenship, it can be considered among the countries that partially allow dual citizenship.

In the Georgian case where citizenship can be regained after an automatic loss, Georgian authorities' have explained that dual citizenship of Georgian nationals is widespread in Turkey as they re-acquire Georgian citizenship<sup>41</sup>. Accordingly, migrants are expected to inform the Georgian consulate when they make an application to receive Turkish citizenship and are no longer considered as Georgian citizens once they receive their Turkish citizenship. In line with the existing legislation, however, migrants have the right to re-apply for the Georgian citizenship through the consulate within one month and reacquire their citizenship. Thus, despite the official ban in the legislation, Georgia tolerates dual citizenship through the right of retainment.

In the same category of partial toleration, the Syrian practice appears to be similar to Georgia because Syrian citizenship can be regained after an automatic loss. Even though the Syrian Consulate in Istanbul was not available for an interview and the *Syrian Nationality Law* requires a Syrian citizen to ask for permission to denounce his Syrian citizenship before acquisition of a foreign citizenship (ECOI Syria), Syria does not appear to strictly require the abandonment of Syrian citizenship for migrants living abroad. Instead, the legal possibility

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<sup>41</sup> In-depth interview with the Georgian Consulate, May 10, 2016, Istanbul

that Syrian citizenship can be regained through a request demonstrates Syria's partial toleration of dual citizenship.

In this category of partial toleration, the only case with a disparity between the legislation and the officials' interpretation is Russia where, interestingly, the officials' interpretation is harsher towards dual citizenship in comparison to the existing legislation<sup>42</sup>. Despite its legislation that rejects the termination of Russian citizenship upon foreign citizenship acquisition, the Consulate explained that Russian citizens cannot acquire Turkish citizenship and that Turkish citizenship is not in the interest of Russian citizens. When reminded of the requirement of notification and the fine for intentional concealment of a second citizenship, the official insisted that, again, Russia does not allow its citizens to acquire foreign citizenship and no Russian citizen can hold another citizenship. Hence, in the case of Russia, one can conclude that the officials' interpretation of the existing legal framework is harsher than the official legislation on dual citizenship as they deny the existence of dual citizens altogether.

In the third category of countries that allow dual citizenship, according to interviews with the concerned consulates, both Bulgarian and Iraqi authorities' interpret their laws in line with the existing legislation. Hence, both states accept dual citizenship as a legal and common practice among Bulgarian and Iraqi communities in Turkey<sup>43</sup>.

Overall, the examination of the dual citizenship situation in the sending countries with a focus on the authorities' interpretation of the laws reveals that only two countries among the major sending countries to Turkey, Russia and Turkmenistan consider dual citizenship as a legal problem and require the renunciation of the original citizenship upon the acquisition of foreign citizenship. Thus, even in the countries which ban dual citizenship officially, state authorities often allow and accept dual citizenship in the face of increasing migration. To conclude, the majority of the migrants' origin countries either allow dual citizenship (explicitly or implicitly) or facilitate the retention or the reacquisition process, hence making dual citizenship possible with Turkey. This common tolerance among the sending countries of migrants is meaningful because it reveals that most migrants in Turkey have the liberty to apply for a second citizenship without pressure from their origin countries

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<sup>42</sup> In-depth interview with the Russian Consulate, September 5, 2016, Istanbul

<sup>43</sup> In-depth interview with the Bulgarian Consulate, May 17, 2016 and in-depth interview with the Iraqi Consulate, May 16, 2016, Istanbul.

and not face the risk of citizenship deprivation. In this regard, a migrant's decision to apply for a second citizenship becomes a question solely in relation to the benefits of Turkish citizenship and long-term life plans.

In terms of the host country regulations on dual citizenship, based on Turkey's *Citizenship Law of 2009*, citizens of several countries may be required to give up their original citizenship upon the acquisition of Turkish citizenship. The list of the countries with which Turkey does not allow dual citizenship is unknown as the list is based on a closed protocol of the Council of Ministers. Unfortunately, despite the interviews with the key officials, the efforts to uncover the countries with which Turkey does not allow citizenship were in vain. Here, the level of concealment in relation to the intolerance of dual citizenship draws attention. However, Turkey's principles of dual citizenship tolerance are still revealed.

Findings from interviews with officials in migrants' citizenship acquisition process in Turkey demonstrate that the key actors in the citizenship process in Istanbul are aware of a valid protocol according to which some citizenship applicants are obliged to give up their original citizenship. However, neither the top officials of the citizenship acquisition process including the *Head of Population and Citizenship Services*, *Head of Citizenship Commission Services* and *Head of Citizenship Acquisition Operations* nor the members of the Citizenship Commission including the *Directorate of National Education* and *Foreigners' Police* in Istanbul are acknowledged about the contents of the protocol<sup>44</sup>. These officers neither know the countries with which Turkey does not tolerate dual citizenship nor question the reason behind this intolerance. Moreover, this issue is considered as a "matter of Ankara" highlighting the state's closed and central stance in relation to migrants' citizenship acquisition.

Failing the expectation of a more clear understanding of Turkey's intolerance of dual citizenship, an in-depth interview with Turkey's top official in this context, namely the *Head of General Directorate of Population and Citizenship Office of Turkey* strengthens the central security approach. The state official described the closed protocol concerning the countries with which Turkey does not allow dual citizenship as "*a red line that cannot be crossed*" and "*a top-secret matter*". Interestingly, this officer with the highest rank in the process of migrants' citizenship acquisition in Turkey labeled the secrecy of the countries

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<sup>44</sup> Interviews with Turkish state officials took place between September and December 2016 with numerous visits to their offices.

with which Turkey does not accept dual citizenship, as the product of an “*outdated thinking*” and “*Cold War mentality*”, signalling a disorientation between Turkey’s old and new status in the international migration system.

Still, the only information that this top state official found “*safe to share*” is that Turkish migrants will never be asked to give up their original citizenship. Here, even though the “content” of Turkish migrants was not openly explained by the official, the migrant examples referred to in the interview lead to the conclusion that Turkish migrants are members of Turkish minorities including Turkish migrants from Bulgaria, Iraqi Turkmen, Iranian Azeris and migrants from the Turkic countries of Azerbaijan, Turkmenistan and Uzbekistan. Thus, “Turkishness” is a clear advantage in the context of Turkey’s dual citizenship policy. Where migrants with Turkish identity are allowed to maintain their original citizenship solely due to their identity and hence become dual citizens, migrants with no Turkish ethnicity or nationality may be asked to give up their original citizenship to receive citizenship in Turkey. In this regard, even though the countries with which Turkey does not tolerate dual citizenship is still unexplored, it is possible to speak of a selective tolerance in the case of migrants with Turkish ethnicity.

Against this background of sending states and host state’s approaches towards dual citizenship, migrants’ approaches towards states’ dual citizenship regulations reveal divergences among the actors of international migration. To begin with, a categorization of migrants’ diverse decision-making modes in relation to dual citizenship laws may distinguish between indifferent, uninformed and informed decision-makers among the migrants from Bulgaria, Germany, Iran, Iraq, Azerbaijan, Georgia, Russia, Syria Turkmenistan, Ukraine and finally Uzbekistan. On the whole, migrants’ approach towards dual citizenship laws appears to be in harmony with their main interest of citizenship, namely, whether to keep home country citizenship or acquire host country citizenship and the maintenance of links with the origin country.

Within this frame, the first category of migrants can be described as indifferent decision-makers which constitute the majority of migrants involved in this study. This category includes migrants unconcerned whether their origin country allows dual citizenship due to a more dominant interest on Turkish citizenship. With regards to host country laws, indifferent decision-makers are mostly unaware of Turkey’s dual citizenship laws because giving up their original citizenship due to Turkish laws does not constitute a point of concern when the main interest is acquiring citizenship in Turkey.

In the second category of migrants involved in this research, which can be characterized as uninformed decision-makers, migrants predominantly concentrate on the maintenance of their original citizenship even though some might also be interested in the acquisition of Turkish citizenship. Despite the weight they attach to keeping the original citizenship, however, uninformed decision-makers among migrants lack solid information on their origin country's dual citizenship laws. Hence, migrants in this category make their citizenship and life decisions in an atmosphere of uncertainties, based on hearsay in relation to dual citizenship laws. Despite some interest in Turkish citizenship, migrants in this category are generally unaware of Turkey's dual citizenship laws because most of their attention is on keeping the original citizenship and returning to their home country at some further point in their lives rather than acquiring Turkish citizenship and settling permanently in Turkey.

Finally, in the informed decision-making category, which includes only the smallest portion of migrants involved in this study, migrants make their citizenship decisions based on factual information concerning the existing legal infrastructure in both home and host countries. The common characteristic of migrants in this category is frequent travel between home and host countries rather than a disconnection with the home country. Moreover, informed decision-makers are often equally interested in both citizenships and despite permanent settlement in Turkey in many of the cases, they have lingering connections with their home country.

Following this summary of migrants' perceptions of dual citizenship laws, this issue is better assessed in comparison to the existing laws. In the elaboration of the divergences between sending states and migrants, to begin with the first category, indifferent decision-makers who are predominantly interested in the acquisition of Turkish citizenship and settled in Turkey permanently are neither informed nor concerned about their home country laws on dual citizenship. To illustrate, despite their lack of solid and clear information on Iranian dual citizenship laws, Iranian migrants involved in this study often express that *"Iran probably does not have an interest over its nationals' citizenship applications elsewhere"* (Mona, female, 30, Iranian). Entering Iran with their Iranian passports, these migrants do not consider their dual citizenship as a legal concern for Iranian authorities because *"many Iranians in Turkey do it this way"* and *"every Iranian in Turkey wants Turkish citizenship"* (Katrin, female, 38, Iranian Turkish dual citizen). To compare with the sending state

perspectives, despite most Iranian migrants' disinterest in Iran's dual citizenship practices, Iran actually allows its nationals to acquire Turkish citizenship.

Similar to the majority of Iranian migrants included in this study, most Iraqi migrants are unaware of Iraqi citizenship laws and unconcerned about the risks of losing Iraqi citizenship due to definitive and permanent settlement in Turkey. Despite Iraqi migrants' disinterest in maintaining their Iraqi citizenship, however, Iraq already allows dual citizenship.

To continue in the indifferent decision-maker category, most Azeri migrants in this study have a vague opinion that Azeri laws may not allow dual citizenship in principle but do not consider this as a major problem even if they have received Turkish citizenship. Neglecting the notification duty they heard to exist from unofficial sources, Azeri Turkish dual citizens enter Azerbaijan with their original passports. Here, only one Azeri migrant involved in this study, a political journalist who refrained from giving the state any reason to cease her Azeri citizenship, formally registered her Turkish citizenship with the Azeri authorities to be on the safe side (*Arzu, female, 34, Azeri Turkish dual citizen*). Other than this specific case, giving more attention to the acquisition of Turkish citizenship, most Azeri migrants do not consider dual citizenship as a legal matter for Azeri authorities. To compare migrant practices with sending state perspectives, as Azeri authorities require the registration of foreign citizenship, migrants' preference to hide their Turkish citizenship is in disharmony with the existing state regulations.

Finally, most Syrian migrants involved in this research are unaware of Turkish and Syrian dual citizenship laws. Considering their return to Syria as a very weak possibility, Syrian migrants are willing to acquire Turkish citizenship for secure settlement and access to services in Turkey and hence, are unaware of Syria's partial toleration of dual citizenship.

Next to indifferent decision-makers, uninformed migrants in the second category concentrate on the maintenance of their original citizenship rather than acquiring Turkish citizenship. However, migrants in this category mostly make their citizenship decisions based on assumptions on sending states' dual citizenship laws.

To illustrate some examples of migrants in this category, many of the migrants from Turkmenistan and Uzbekistan involved in this study assume that their origin countries do not allow foreign citizenship acquisition and hence, fear that they may lose their original citizenship upon their citizenship application in Turkey. With this thinking, uninformed

migrants often take two routes in order not to lose their original citizenship. The first route is to refrain from applying for Turkish citizenship and residing in Turkey through residence permits even if they have fulfilled the legal criteria for citizenship application. In this regard, even in cases of marriage with a Turkish national, most Turkmen and Uzbek migrants involved in this study fear the consequences of dual citizenship and hence, prefer not to apply for Turkish citizenship. The second route, for those who received Turkish citizenship in Turkey, is to avoid visiting their home country due to the concern that they may be forced to leave their original citizenship in case their foreign citizenship acquisition comes to the notice of the authorities. Most Turkmen and Uzbek migrants interviewed within the framework of this research expect that the authorities in their origin country “*see everything through the computer*” (Gonca, female, 43, Turkmenistan). Consequently, the impact of (assumed) laws of dual citizenship on life decisions is severe. To compare migrants’ citizenship practices with the sending states’ dual citizenship practices, migrants’ discourses on Turkmenistan’s dual citizenship legislation that is strictly against dual citizenship do not fall far from the state officials’ statements. However, as an official of Uzbekistan admitted their unawareness of the cases of dual citizenship, unlike the Turkmens, Uzbek migrants’ precautions not to lose their Uzbek citizenship appear to be groundless.

To continue with examples of uninformed migrants, similarly, considering Turkey as a place of employment with the intention to spend their retirement years in the home country in financial comfort, most of the Georgian nationals involved in this study are unaware of host and home state laws of dual citizenship. While most Georgian migrants assume that Georgia “*probably would not care what Georgians do elsewhere*” (Temo, male, 29, Georgian), only one Georgian migrant has the opinion that Georgian authorities should be notified upon citizenship applications elsewhere because they have the right to cease a migrant’s Georgian citizenship (Seyli, female, 64, Georgian). Hence, as Georgia tolerates dual citizenship through the right of retainment, even though their interest in Turkish citizenship is low, migrants’ knowledge of Georgia’s dual citizenship regulations may be considered as disconnected from the actual regulations.

To continue with other cases of uninformed decision-makers, Ukrainian nationals involved in this study most of whom are not interested in receiving Turkish citizenship, often cannot make certain statements on dual citizenship laws. In point of fact, Crimean Tatars from Ukraine already have dual citizenship with Ukraine and Russia, the latter being an obligation after Russia’s intervention in Ukraine. While one migrant in this community

claimed that the Ukrainian authorities would not notice her Turkish citizenship application despite the existing laws that do not tolerate dual citizenship (*Zahreh, female, 28, Crimean Tatar*), the general opinion is that Ukraine probably would not allow them to receive Turkish citizenship. To compare migrants' practices with those of their states, as Ukraine turns a deaf ear to dual citizens, migrants' knowledge of Ukraine's dual citizenship regulations may be considered as detached from the actual regulations.

To finalize the category of uninformed decision-makers, the majority of Russian migrants involved in this study, unlike most others in the category of uninformed decision-makers, apply for Turkish citizenship despite their fear to lose Russian citizenship. While most Russian migrants are equally interested in acquiring Turkish citizenship and maintaining their Russian citizenship, they believe it may be possible to hide the acquisition of a foreign citizenship from the Russian authorities. With this thinking, they either hide their citizenship of Turkey by entering Russia with their Russian passport or choose not to visit Russia due to the "*volatility and unpredictability of Russian politics*" according to which they may lose Russian citizenship upon entrance (*Alex, male, 37, Russian*). As the officials' interpretation of the existing legal framework is harsher than the official legislation on dual citizenship, Russian migrants' precautions to maintain Russian citizenship seem to be in place.

In the final category, informed decision-makers- the only migrants who have substantial information on dual citizenship laws of their origin and host countries are those who frequently travel between the two countries and have not totally abandoned their links with the origin country. To illustrate, Turkish migrants from Bulgaria have in-depth information on Bulgaria's dual citizenship laws and are fully aware that both Bulgaria and Turkey allow dual citizenship. Likewise, migrants from Germany are knowledgeable about their right to maintain their German citizenship if they can credibly convince German authorities based on the existing legal infrastructure.

Despite the similarity concerning their knowledge of dual citizenship laws, most Bulgarian and German migrants involved in this study are dissimilar concerning their interest in Turkish citizenship. While all ethnic Turks from Bulgaria either received or plan to apply for Turkish citizenship, some migrants from Germany choose not to apply for Turkish citizenship due to the fear that they might lose German citizenship upon not being able to provide a credible reason to maintain it. To compare with the state practices, Bulgaria's dual citizenship practices, which are in line with the existing legislation, are also acknowledged



by the migrants from Bulgaria. Likewise, German migrants' statements on the dual citizenship regulations are in harmony with the existing information.

In an overall analysis of migrants' knowledge of and compliance with dual citizenship laws, first, the contrasts between the existing practices and the legal infrastructure of sending states should be underlined. Accordingly, despite the seemingly high number of migrant sending states which do not tolerate dual citizenship in the Turkish context, this study reveals that most of the sending states are more tolerant of their nationals' applications of Turkish citizenship than their legal infrastructure suggest.

Secondly, in addition to this tolerance of sending states towards the dual citizenship of their nationals in Turkey, an interesting finding is most migrants' unawareness of dual citizenship laws. The critical variables in this regard here as the dominant interest of citizenship- whether a migrant concentrates on acquiring host country citizenship or keeping the original one. One can easily reach the conclusion that where migrants have a greater focus on the host country citizenship, they may often disregard the legal infrastructure of their origin country concerning dual citizenship. In parallel, where migrants are more interested in maintaining their original citizenship, they tend to be more concerned about the citizenship legislation of their home country. However, in the latter case, this interest in maintaining the original citizenship does not mean better access to information on the dual citizenship practices of the sending state. Instead, most migrants are unaware of the sending state regulations of dual citizenship regardless of their interest of maintaining the original passport. In this regard, maintaining active links with the home country and travelling back and forth between home and host countries lead to more awareness on dual citizenship laws.

Apart from the duty of knowing and acting in accordance with dual citizenship laws, the subject matter of migrants' duty to obey laws in home and host countries also leads to interesting findings. In terms of the sending state expectations, all consulate officials underline that their citizens are expected to obey their origin state laws and that migrants who commit crimes would not be allowed to leave their country. Moreover, most consulate officials explain that once an act of crime is noticed, they would ask for Turkey's cooperation to receive a criminal. Concerning the difficulties of the determination of applicable law in cases involving dual citizens, as most consulate officials respond, *"international agreements help to solve such issues depending on the nature of the case"* (interview with the German consulate).

In terms of the host country expectations, all Turkish officials interviewed within the framework of this study emphasize the obligation to obey laws, or “the respect of laws” as it is standardly used in the officials’ statements, is valid for migrants same with Turkish citizens. Moreover, much emphasis is also made on the security forces’ careful consideration, high skills and ability to investigate the crimes committed by foreign migrants in Turkey. Concerning the issue of the determination of applicable law in cases involving dual citizens, however, Turkish officials give the impression that dual citizenship does not create challenges in this way because “*dual citizenship is not a new situation and courts solve the problems involving dual citizens*” (interview with the Head of Population and Citizenship Services in Istanbul).

As the third actor in the triadic structure of international migration, migrants’ statements on their duty to obey the home country laws displays the common opinion that “*a migrant is subject only to the rules of the country he resides in*” (Menekşe, female, 38, Iranian Turkish dual citizen). Accordingly, migrants feel legally linked to their home country only through receiving inheritance from deceased family members, which “*should not be a challenge unless migrants commit crimes in their origin country*” (Kenan, male, 30, Iraqi). Thus, complications concerning the determination of applicable law for dual citizens are rare and “*do not apply to normal dual citizens*” (Ayten, female, 31, Turk from Bulgaria). In this regard, migrants feel disconnected from their origin country and feel solely responsible towards their country of residence in terms of laws.

Hence, in the subject matter of migrants’ duty to obey laws in home and host countries reveals that sending states’ lack of legal expectations from migrants makes a high contrast with the host state’s emphasis on obedience to law as a critical factor in the relationship with migrants. In line with this, migrants feel legally subject to only the residence country in the context of Turkey.

### *Payment of taxes*

Following the subject matter of obedience to law in the context of dual citizenship as part of the duties within the formal status of citizenship, migrants’ obligation to pay taxes in both countries of citizenship and problems concerning tax evasion are elements much discussed in the dual citizenship literature.

To begin with the sending country perspectives towards their nationals’ payment of tax, none of the consulate officials underlined this duty. Instead, the question of taxation was

considered with surprise on the account that taxation is based on the residence of principle. Hence, in the context of migrants from Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine and Uzbekistan, migrants are not expected to fulfill their taxation duties. This, naturally, may be explained by the reality that migrants do not reside in their country of origin. Still, the fact that no taxation duties were mentioned in relation to property tax on houses or fields that some migrants may own in the origin country draws attention.

In terms of the host country perspectives towards taxation duties in Turkey, all officials who were interviewed in this research underlined that “*Turkey expects all residents to pay taxes in line with the law*” (interview with the Head of Citizenship Commission Services in Istanbul). Moreover, “*those who do not pay their taxes regularly will not be given Turkish citizenship*” (interview with the Head of Population and Citizenship Services in Istanbul). Hence, in contrast to the sending state perspective, which displays a release from migrants’ citizenship duties, the host country of Turkey highlights the duty of taxation as a top priority.

Following the sending and receiving countries in the triadic structure of international migration, migrant statements on taxation display a similarity with the sending and receiving states involved in this study. To begin with, none of the migrants included in this study—citizens as well as non-citizens, mention their taxation duty to their origin country as a problem and none are aware of taxation duties in their homeland. Clearly pointing out that they do not pay any taxes in their origin country because they reside in Turkey, migrants put forward that the duty of tax payment is only related to the residence country.

Furthermore, in terms of the taxation duty towards the origin country, migrant statements on this subject are generally short and vague. Only one Turkish migrant from Bulgaria explained that the payment of taxes in Bulgaria is easily evaded by applying to the municipality to inform that one’s residence is in Turkey. However, this migrant lacks knowledge on whether migrants residing in Turkey are expected to pay real estate tax over their house and lands in Bulgaria, suspicious that “*Bulgaria may create a problem afterwards because you did not pay their taxes*” (Reyhan, male, 26, Turk from Bulgaria). Despite this case, overall, one can easily draw the conclusion that migrants in Turkey do not perceive taxation as an issue and the issue of taxation works based on the residence principle according to which migrants only pay taxes to the country where they reside.

In terms of their taxation duty towards Turkey, all migrants who reside in Turkey through residence permits or citizenship consider the payment of taxes as crucial. In many cases, migrants consider regular tax payment as a source of pride signalling self-sufficiency instead of being a needy migrant as a burden on the state. Interestingly, many of the tax paying migrants involved in this study spoke of their fulfillment of this duty in contrast to Syrian migrants. Here, an Iranian-Turkish dual citizen highlights that he should not get the same treatment with Syrian migrants because he is a regular tax-payer as a legal resident since 2008 (*Celil, 41, male, Iranian Turkish dual citizen*). Perceiving Syrians to be unjustly receiving financial state support and holding superior rights in access to residence permits and citizenship “*as the top community in a hierarchy of foreigners in Turkey*”, this Azeri migrant from Iran believes “*it is irrational that temporary identity card holders get better services than citizens because they should be getting less than tax paying citizens*” (*Celil, 41, male, Iranian Turkish dual citizen*).

However, the duty of tax payment for migrants who hold residence permits is sometimes considered as unjust. Regarding residence permits as insufficient for a safe life in Turkey because of the frequently changing regulations and expensive due to annual residence fees, several migrants interpret residence permits as “*paying taxes for no services*” (*Hüseyin, male, 29, Bulgarian Turkish dual citizen*). In this regard, one Russian migrant who had difficulty in the process of citizenship acquisition criticized the Turkish state’s disregard of migrants’ tax payment. Accordingly, “*a migrant who works in Turkey and has constantly paid taxes receives citizenship harder than a migrant who does nothing but marry a Turk*” (*Natalie, female, 36, Russia*). This female migrant considers this as an advantage of marriage which demonstrates “*Turkish state’s conservative approach to migrants where the state’s main interest is family values and making more women Turkish rather than giving employed women who pay their taxes their right of citizenship*” (*Natalie, female, 36, Russia*).

Within this frame, even though the approaches to the issue of taxation are similar for the key actors of international migration in the sense that the duty of taxation towards origin countries is released and the duty towards the host country is emphasized, migrants in Turkey do not fully agree with Turkey’s “*over- insistence on migrants’ payment of taxes in all processes such as residence and work permits and citizenship*” (*Şahin, male, 28, Iraqi Turkish dual citizen*). In this regard, both for migrants with and without Turkish ethnicity, the duty to pay taxes creates the impression that financial wealth is the key to the acquisition of both residence permit and citizenship in Turkey.

### *Military obligations*

A major theme in the dual citizenship literature with regards to the formal status of citizenship concerns the duty of military obligations, which may require migrants' dual service due to their overlapping membership in more than one polity. Here, it should be pointed out that only three of the top sending countries to Turkey, namely Azerbaijan, Iran and Russia oblige their citizens to serve in their military. Hence, even if Turkey imposes military obligations to its new citizens, they would not be facing dual military obligations.

To explore the sending state perspective towards military obligations, consulate officials were directly asked about the military obligations in their countries. Apart from the Consulate of Azerbaijan with which no interview could be held, the consulates of Iran and Russia clearly stated that military service is a citizenship duty in their countries, but their nationals in Turkey are not expected to serve at the Turkish military. The other consulates of sending countries involved in this study stated that their countries do not oblige military service for their nationals, but that their citizens are also not asked to serve in the Turkish military.

To shed light on Turkey's expectations of military service, the Head of General Directorate of Population and Citizenship Office of Turkey was asked whether migrants who receive Turkish citizenship are expected to serve in the Turkish military. The response to this question was that the *"Turkish military does not need the human resources from the foreigners who receive Turkish citizenship"* (interview with the Head of General Directorate of Population and Citizenship Office of Turkey). Here, one can easily draw the conclusion that military service is not among the citizenship duties of migrants who receive Turkish citizenship. However, this information is in contrast with the existing legal infrastructure according to which migrants are expected to serve in the military if they have not already served in their origin country. Hence, the practices with regards to military service may not be in line with the existing law.

Still, the question of dual military service obligations does not represent a problem for most of the male migrants included in this study. Here, the lack of formal information on the duty of military service is mentioned in many migrant statements. Among the male migrants involved in this study, one Turkish migrant from Bulgaria explains,

*"I still do not know to this day whether I will be asked to go to the military. To say the truth, I never understood how I was given citizenship this easily in 2011 and still do not know much about my status, for example concerning the military service in Turkey."*

*I think this will be clarified once I graduate from university. Still, the question of military was not worth not to apply for citizenship. I would still apply for it if I knew I was to serve in the military” (Asim, male, 29, Turk from Bulgaria).*

Another migrant described the atmosphere of uncertainties of his citizenship acquisition as *“there were many false rumors that university students who apply for Turkish citizenship would lose their scholarship and all male applicants would forcibly be sent to the military” (Asim, male, 29, Bulgarian Turkish dual citizen).* In the context of this uncertainty, most migrants have heard from unofficial sources during their application for Turkish citizenship that the obligation to serve in the Turkish military does not apply to them. While none of the migrants- even among those who received citizenship in Turkey could specify it for certain, migrants have the opinion that those who receive Turkish citizenship after the age of twenty five are not obliged to serve in the military. Consequently, migrants do not believe that they would actually be called for military service in Turkey.

As a consequence of this disbelief in the duty of serving in the Turkish military, even among the migrants from the three sending countries which oblige their citizens to serve in the military, namely Azerbaijan, Iran and Russia, serving in the Turkish military does not constitute a source of tension in relation to citizenship application in Turkey. To illustrate, in the case of Iran, none of the Iranian migrants included in this study mentioned the risk of a dual obligation because they neither heard from other migrants nor were told by the Turkish state authorities that they would be called for military service. Here, Azerbaijani and Russian migrants’ opinions on military obligations show diversity when compared to Iranian migrants. Despite the fact that no migrants from these two nationalities served in dual militaries, Azerbaijani and Russian migrants highlighted the possible risk of dual military obligations for their male children born in Turkey. To bypass this obligation, a common solution for their children is described as possibly leaving the original citizenship in the future. However, this remains solely a probable scenario for the children of migrants from Azerbaijan and Russia and is not perceived as a major concern.

Within this frame, three conclusions can be derived from the in-depth interviews with migrants and state officials in relation to military services. First, the issue of military service appears to form a vagueness that surrounds the issue of Turkish citizenship duties even for those who have already received Turkish citizenship. In other words, this duty of Turkish citizenship remains unclear for migrants in Turkey even if they are involved in the citizenship application process. Secondly, having to serve in dual militaries is not a concern for most male migrants from the top sending countries to Turkey. Consequently, even the

migrants from sending countries with compulsory military service do not consider military obligations as an issue when they make citizenship decisions in Turkey. Hence, the theme of dual military obligations remains as a possible future risk for only the male children of Azerbaijani and Russian migrants who do not consider this as an element against citizenship application in Turkey. Finally, the authorities' discourse and the legal infrastructure on the obligation to serve in the military is not in line. In the practice, it appears that military service is not considered an essential citizenship duty for migrants who receive Turkish citizenship.

## **5.2 Citizenship rights**

Following the duties that form the first base of the citizenship dimension of legal status, citizenship rights constitute a critical subject matter in the second base due to dual citizens' overlapping membership in multiple polities. In the context of the existing dual citizenship literature, the rights forming the citizenship dimension of legal status are the rights of dual voting and access to diplomatic protection. Here, several points draw attention concerning practices and opinions with regards to these rights in the triadic structure with the sending states, host country and migrants.

### *Political participation*

In terms of the sending state perspectives towards political participation, responses concerning political participation are diverse and can be considered along a spectrum with opinions ranging from intolerance to full encouragement.

To begin with, except the Consulates of Turkmenistan and Russia which deny the existence of dual citizenship on the account that their laws do not allow dual citizenship and their nationals do not receive Turkish citizenship, all other consulates, including those with legislations against dual citizenship, accept that dual citizens are allowed to vote in their origin countries even if they reside elsewhere. Hence, the sending states of Turkmenistan and Russia can be considered as located on the negative side of the spectrum. To continue along the negative end of the spectrum, the interview with the consulate official of Uzbekistan creates the impression that migrants' political participation is not much appreciated if their residence country is elsewhere.

In the positive side of the spectrum, officials from the Georgian, Iranian and Ukrainian Consulates stated that political participation is a citizenship right of value, but add that the number of their nationals who live in Turkey and travel to their origin country to vote in the political elections is unknown. Again in the positive side of the spectrum, in the Iraqi case, the consulate official admitted that their citizens, especially Turkmen, are very interested in political elections and able to participate in the elections often through the Iraqi consulates. In the case of Bulgaria and Germany, consulate officials emphasized that they fully encourage their migrants' participation in political elections. Additionally, in the Bulgarian case, ethnically Turkish migrants from Bulgaria have a wide reputation for their political awareness and willingness to participate in their origin country elections. Here, it should be noted that no officials, except the Iraqi consulate, mentioned the option of external voting as a mode of political participation. In consequence, the lack of external voting may oblige migrants to physically return to their origin country to access the right of voting in the elections and may act as a factor that hinders political participation in the origin country.

To explore the host country perspective towards the issue, Turkish officials were asked their expectations concerning migrants' access to the right of political participation. In this regard, Turkish official responses concerning political participation predominantly demonstrate that political participation is not received as a right but instead, duty in the context of Turkey. State officials have the tendency to pronounce "the duty of voting" along with the "duty to be respectful to law". Second, the subject matter of political participation does not appear to be a major point of concern for host state officials. Here, based on its weight in the interviews, one can draw the conclusion that political participation remains in the shadow of citizenship duties of tax payment and obedience to law.

To continue with the final actor of international migration, migrants' practices and opinions on political membership vary greatly among migrants involved in this study and interestingly, range from having completely abandoned the interest in political participation to being politically active in two countries. With regards to political participation, based on the statements of those included in this study, migrants' Turkish minority identity in their home country may be regarded as a factor that increases the will for political participation and thus, dual voting. Here, firstly, migrants feel the obligation to participate in home elections due to their duty towards their minority. Secondly, the fact that migrants' minority identity in their origin countries is linked to their Turkish ethnicity as in the case of Turkish



migrants from Bulgaria, Iraqi Turkmen and Iranian Azeris appears to increase their interest in Turkish politics.

To illustrate the impact of Turkish minority identity, ethnic Turks from Bulgaria and Iraqi Turkmen not only vote in both their origin and host countries, but also most migrants from these two communities are members of political parties in linkage to their Turkish minority identity in their home countries. While all ethnically Turkish migrants from Bulgaria included in this study have a high motivation to vote both in Turkey and Bulgaria, most migrants in this community have active party membership to minority parties in Bulgaria. Holding the desire to make improvements for the Turkish minority in Bulgaria, these migrants frequently meet in their migrant organizations and “*try to find how they can be of use to their Turkish party in Bulgaria*” (Asım, male, 29, Bulgarian Turkish dual citizen). With regards to the right of voting in two countries, a Turkish migrant from Bulgaria who received Turkish citizenship in 2011 defended his dual voting rights, stating:

*“I am an active member of both societies politically. I vote on both sides of the border. I have the right to exercise the one advantage of democracies- the right to vote. I have two countries, two identities, two rights. I am affected by the economic, political and social situations in both countries. For example, a change in the regulation in the retirement age in Bulgaria and Turkey would both affect my life. For this reason, I should have a right to say in both. This is not against the one person, one vote rule of democracies. This is exactly in compliance with it. After all, I am one person in both of the two countries”* (Ahmet, male, 29, Bulgarian Turkish dual citizen).

Likewise, Iraqi Turkmen display a high interest over politics in both countries. Firstly, migrants in this community highly value the act of voting in Turkey because they perceive Turkey as their homeland. Secondly, they consider their participation in the Iraqi elections as a duty towards the remaining Turkmen in the area with the hope that their votes will pave the way to increase Turkmen’s living standards in Iraq. Apart from voting in both polities, Iraqi Turkmen are highly sensitive to the political events in Kirkuk. Considering their political participation in Iraq as crucial to the Turkish presence in their origin country, they frequently organize protests in Turkey in relation to the Turkmen minority in Iraq through their migrant organizations.

In comparison, other migrants are generally less interested in political participation in both countries. Here, the primary reason behind the lack of interest in electoral participation appears to be distrust or disinterest in elections in Turkey and their origin country. Some migrants expressed that both the elections in Turkey and their home country are not fully

independent and their votes are ineffective. In this regard, an Iranian dual citizen who received Turkish citizenship through marriage stated:

*“I hardly ever voted in Iran. Because the elections are not independent, in the end it is not the people who choose the governing parties. So I never felt the urge to vote. Plus, there is no political figure in Iran that I feel close to. Likewise, I never participated in political actions to change the situation in Iran. Because I am completely hopeless about the situation and I never felt it worthy of risking my life and family into this kind of risky actions. In parallel, I did not vote in Turkey even though I have the right to vote. If I had voted, I would vote for CHP against AKP. But I felt that the elections here are not fair, just like in Iran. I just did not want to go and vote on that day. It is not obligatory to vote any way” (Menekşe, female, 38, Iranian Turkish dual citizen).*

Overall, in the empirical research on political participation of dual citizens, the first divergence of the opinions on political participation is rooted in the states’ varying perceptions of political participation. Where sending states consider political participation as a right, the receiving state of Turkey perceives migrants’ political participation as a duty. To continue, the second divergence comes into light with regards to the sending state perspectives that demonstrate great heterogeneity on a large spectrum on migrants’ political participation. The third divergence emerges in relation to the final actor in the triadic structure. While the great majority of migrants are interested in political participation neither in the host nor the origin country, a high diversity marks migrant practices of political participation and a critical element appears as minority membership in the home country.

### *Diplomatic protection*

In the triadic structure that constitutes of sending and host states and migrants, to begin with, none of the sending state officials from Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine and Uzbekistan consider the issue of complications linked with dual diplomatic protection as a crucial matter. Consulate officials, in all cases, underline their efficiency to intervene in problematic situations involving their own citizens, however, dual diplomatic protection is not described as a challenging field. The interviews with consulate officials create the impression that the possibility of dual diplomatic protection representing a difficulty among states is low.

In response to Turkey’s stance concerning the dual diplomatic protection of dual citizens, Turkish officials place importance on Turkey’s frequently mentioned “protective hand that goes to across the borders” in cases involving ethnically Turkish people in the region despite their non-citizen status. However, no clear and direct opinions are put forward

with regards to dual diplomatic protection where Turkey may have contrasting actions facing another state that exerts diplomatic protection for a dual citizen, giving the impression that such instances are either rare or solved through the cooperation in the international arena rather than creating problems among the countries.

Likewise, the issue of complications linked with dual diplomatic protection is not regarded as a crucial matter among the migrants included in this study. Most migrants disregard this subject with the opinion that the need for diplomatic protection is an extreme matter that does “*not apply to dual citizens unless they are political figures*” (Celil, male, 41, Iranian Azeri dual citizen). The perception of diplomatic protection being a distant subject is common among migrants most of whom link this issue with political journalists and sometimes criminals. Overall, “the issue of “*dual diplomatic protection has no importance to normal people*” (Çemen, female, 40, Turkmen dual citizen). While most migrants see dual diplomatic protection as a remote matter that concerns political figures or criminals who hold dual citizenship, dual citizens from Azerbaijan and Turkmenistan are entirely unaware of the concept of dual diplomatic protection. According to their thinking, having acquired Turkish citizenship eliminates their access to legal protection of their country of origin in Turkey despite their maintenance of their origin citizenship.

In contrast to this general disregard, diplomatic protection was considered important for ethnically Turkish migrants from Iraq and Bulgaria. Several Iraqi Turkmens highlighted that Turkey, not Iraq, was their diplomatic protector even before their migration to Turkey. As they explain, they are not considered fully Iraqi by their own government and their diplomatic protector is Turkey regardless of their place of residence. Likewise, several ethnically Turkish migrants from Bulgaria explained that they felt Turkey’s protection even before they migrated to Turkey. In these migrant communities, dual diplomatic protection is not considered as a problematic issue because migrants seem to have never considered Bulgaria and Iraq as a protector of their rights. Hence, for these two ethnically Turkish migrant communities, dual citizenship does not lead to dual diplomatic protection. Instead, enjoying Turkey’s protection based on ethnicity regardless of place is praised as a positive element in relation to Turkey’s external policies and a source of pride.

Despite migrants’ general disregard towards the issue of dual diplomatic protection, only one migrant, a male migrant from Germany married to a Turkish citizen hesitates to apply for Turkish citizenship solely due to the issue of diplomatic protection (Henrik, male, 38, Germany). Worried that he may lose Germany’s protection in Turkey upon citizenship

acquisition, *Henrik* resides in Turkey by holding a residence permit since 2008 even though he is legally eligible for citizenship. To explain the reason behind his fear, the migrant expresses anxiety over Turkey's authoritarian stance towards its people and increasing pressure on freedom of expression, describing the human rights situation in Turkey as “*everyday less space to breathe*”. In this regard, losing Germany's protection means, in *Henrik's* words, “*lack of protection and vulnerability towards an authoritarian state*”.

Overall, one can conclude that actors mostly converge on the right of access to diplomatic protection. Neither states, nor migrants perceive dual diplomatic protection as a point of concern because it emerges as a remote subject matter of extraordinary circumstances.

### **5.3 Concluding remarks**

A better understanding of how dual citizenship operates in the formal status dimension of citizenship and its impacts on the rights and duties of the citizenship institution requires an in-depth analysis of the dual citizenship opinions and practices in the triadic structure. As the question at the core is whether dual citizenship leads to a paralysis of formal citizenship, the analysis of converging and diverging viewpoints among sending and host states and migrants on citizenship duties and rights are a crucial element in response to this question.

Concerning the duties of citizenship which are obedience to law, taxation and military service, dual citizenship leads to an asymmetry or a disproportion among the weight of duties for each actor in the triadic setting. While dual citizenship rarely entails two perfectly symmetrical memberships of the origin and the host country (Leuchter 2014), the level of asymmetry in the citizenship duties in the context of dual citizenship is remarkable.

Primarily, concentrating solely on the legal infrastructure of dual citizenship in sending countries proves not only inadequate, but misleading because even in the countries which ban dual citizenship officially, state authorities often allow and accept dual citizenship in the face of increasing migration. In contrast, in terms of the host country regulations of dual citizenship, an atmosphere of security and top secrecy is most evident, especially in relation to the sending countries with which dual citizenship is not allowed. To follow, this research reveals most migrants' disinterest in their origin countries' dual citizenship laws and practices, especially if citizenship interests of the host country dominate the interest of

maintaining the original citizenship. Still, even those migrants who hold an interest to maintain their original citizenship lack information on sending country regulations. In this regard, a major disconnection between sending country regulations and migrants' knowledge of the concerned states' regulations is evident. Obedience to law, similar to the disconnection from sending states in terms of dual citizenship laws, demonstrates a disconnection between the sending states and migrants. At this point, sending states are disengaged from the migrants in their expectation of migrants' obedience to law due to the fact that migrants reside in a host country. In contrast, migrants feel exclusively tied to Turkey with regards to obedience to law as Turkey represents the country of residence where the state emphasis on obedience to law is clearly evident in its relationship with migrants.

Similarly, in terms of the second citizenship duty to pay taxes, sending states create the impression that, as migrants do not reside in their country of origin, they have released migrants from their taxation duty. In contrast to this disengagement, the fact that Turkey, as the host country, makes a strong emphasis on the migrants' duty of taxation represents a severe contrast with the sending country perspective. Migrants, in line with these conditions, solely highlight their responsibilities towards Turkey in terms of taxation, but do not feel completely at ease with the strict practice of taxation that has a critical role in the acquisition of residence permits and citizenship, which many migrants regard as "payments without services".

The final citizenship duty of military service appears as an inactive subject for sending states. Turkey, as the host country, also demonstrates a disinterest in obliging its new citizens in the military despite the existing legal infrastructure. Here, even though an atmosphere of uncertainty surrounds migrants as to whether they are expected to serve in the Turkish military, the possible obligation to serve in the Turkish military does not constitute a point of concern for migrants.

Hence, the first asymmetry within the frame of citizenship duties is between the sending and host states. On the one hand, sending states create the impression that they have released migrants from their duties of obedience to law, tax payment and military service. On the other hand, Turkey as the host country has strict expectations from migrants in terms of obedience to law and taxation, however, puts forward no expectations in relation to military service possibly due to the fact that military represents an matter of security. Thus, the second asymmetry regards the weight Turkey puts on the duties, highlighting taxation and disregarding the military obligations despite the Conscription Law that requires military

service unless the applicants already served in their homeland. The third asymmetry concerns migrants' approaches towards citizenship duties in which one can easily conclude that citizenship duties towards sending states are mostly eliminated even in instances where migrants consider the maintenance of the original citizenship to be critical and, in some cases, even refrain from the acquisition of Turkish citizenship. In terms of the duties towards Turkey, migrants consider taxation and obedience to law as important, however, military duties are neglected. Hence, all actors in the triadic structure meet citizenship duties with an asymmetrical, disproportionate weight.

Leaving behind the citizenship duties of obedience to law, taxation and military obligations, the two citizenship rights that attract attention in the context of dual citizenship, namely political participation and diplomatic protection, are also attached disproportionate significance by the actors in the triadic structure.

To start with, on the one hand, sending states' approaches towards the subject of migrants' political participation can be considered as a spectrum with opinions ranging from intolerance to full encouragement. Still, the great majority of sending countries in the context of Turkey appear to value migrants' political participation despite the fact these migrants live abroad. On the other hand, Turkey, as the host country, equals political participation to the duty of obeying the law and underlines the duty aspect of voting rather than perceiving participation as a right, which appears to be in line with Turkey's officials' strict emphasis on duties in its relationship with migrants. Next, migrants display an equally diverse stance towards this aspect of citizenship in which their practices and opinions vary greatly ranging from having completely abandoned the interest towards political participation to being politically active in both countries of membership. Despite the fact ethnically Turkish minority members have high awareness of politics in both Turkey and their origin countries, migrants generally do not exercise the right of political participation widely despite most of the sending and host states' considerations of this right crucial either as a right or duty. Secondly, in terms of diplomatic protection, none of the actors included in this study consider sending state officials consider the issue of complications linked with dual diplomatic protection as a crucial matter.

Based on these findings on citizenship rights, similar to the conclusions concerning the duty dimension of citizenship, the most critical asymmetry is evident in relation to political participation. Even though the majority of sending states in the context of Turkey value the right of political participation, Turkey, as the host state sees political participation

as synonym to the duty of voting. In contrast to the host state expectation, however, the majority of migrants do not exercise this right widely.

To conclude, the core finding of this empirical research is the asymmetrical weight of various aspects of formal citizenship in the perceptions and practices of states and migrants in the context of dual citizenship. Here, sending states eliminate their expectations from migrants in all three duties of obedience to law, taxation and military obligations. In contrast, Turkey as the host country makes a strong emphasis on obedience to law and taxation, but omits the duty of military obligations. Migrants, however, concentrate solely on the first two of these duties, obedience to law and taxation, and importantly, only towards the host country. In terms of citizenship rights, political participation is valued by the majority of sending and host states, however disregarded by many of the migrants. Finally, all three actors generally disregard diplomatic protection as a right.

In response to the core question of whether dual citizenship leads to a paralysis of formal citizenship, research findings clearly demonstrate that a total or a complete paralysis of formal citizenship in the context of dual citizenship is inaccurate. Instead, in the context of dual citizenship in Turkey, a partial paralysis of formal citizenship is more relevant due to the asymmetry of the various aspects of citizenship rights and duties from the viewpoint of sending and host states and migrants.

Here, it should be underlined that this disproportion in the significance of various rights and duties are not always in linkage with the fact that migrants reside in a host country away from their original country. While sending states may not be actively expecting migrants to fulfill duties and exercise rights, their acts of opposing the legislation and turning a deaf ear to the existence of dual citizens creates the impression that sending states have released their migrants from formal citizenship. Likewise, from the viewpoint of migrants, the disregard of duties towards the sending states in terms of obedience to law, taxation or military obligations may be only partially explained based on the residence principle, in the sense that migrants' country of residence is no longer their origin country. To illustrate, political participation in the original country may not be possible due to limitations in external voting or the limited financial resources to vote in person. However, the fact that even dual citizens residing in Turkey often refrain from voting in Turkish elections illustrates the partial paralysis of formal citizenship from the migrants' side.

In light of these findings, on the whole, the impact of dual citizenship on formal citizenship is a major shift in various aspects of formal citizenship in the triadic structure of sending and host states and migrants. The ways in which formal rights and duties are exercised transform as a result of migrants' overlapping membership in the context of dual citizenship. While sending states almost completely eliminate their weight in terms of citizenship duties and rights, the host state also approaches these with a disproportionate emphasis. Making citizenship decisions in the absence of concrete information on state practices, migrants' response is not completely parallel with this shift in states' expectations, as the right of political participation, to exemplify, is also generally disregarded. Accordingly, dual citizenship leads to not a complete, but a partial paralysis of formal citizenship in the context of dual citizenship in Turkey.





## CHAPTER 6

### **Dual citizenship as a barrier or catalyst of integration? Impacts on the activity and identity dimensions of citizenship**

Surrounded by fears and hopes, a central question in the dual citizenship literature is whether dual citizenship operates as a barrier against or a catalyst of integration in the host countries. In this regard, the question is whether a migrant holding dual citizenship and hence the option of return, would really make an effort for integration in the host country. Following the question whether dual citizenship leads to a paralysis of formal citizenship, this question concerning integration requires an assessment of the citizenship dimensions of activity and identity in the context of dual citizenship. Within this frame, by relocating the concentration on dual citizenship to a novel research setting, this research examines the question of integration and dual citizenship through the assessment of citizenship dimensions of activity and identity in the context of Turkey.

Within the framework of Kymlicka and Norman's (2000) citizenship dimensions of activity and identity, in the first dimension, a person's citizenship activity is seen as a critical element of responsible citizenship, which requires citizens' willingness to participate (Carens 2000, 166). In the context of international migration, the activity dimension of citizenship may be described as what a migrant, in Kostakopoulou's thinking, "owes" to the host community (Kostakopoulou 2003, 86). Along these lines, citizenship as activity refers to citizenship as a mindset and constitutes of participation in the political, social, economic life of the community (Oers 2013, 18). In the second citizenship dimension, identity highlights the social status of membership to a polity and the identification with it. This dimension underlines the loyalty, commitment to the culture and tradition and finally, the feelings towards a nation (Carens 2000, 166).

In response to the question of how dual citizenship operates in the activity and identity dimensions with regards to integration in the Turkish context, to incorporate all the actors of international migration in the research with a balanced weight, in-depth interviews were made with both host state officials and the major sending states' officials from Azerbaijan, Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Syria, Turkmenistan, Ukraine

and Uzbekistan<sup>45</sup>. At the individual level, migrants from these origin countries were interviewed to shed light on the migrants' perceptions and practices of the activity and identity dimensions of citizenship. Hence, empirical findings in this chapter are presented in a manner to highlight the convergence and divergence of the three actors' viewpoints and divided into two sections. These sections are based on the citizenship dimensions of firstly, activity, which includes migrants' participation in the economic, social and political life of the community and secondly, identity, through the particular identities of ethnicity, nationality, religion and gender.

### **6.1 Citizenship dimension of activity: participation in the political, economic and social life of the community**

For a better analysis of the operation of dual citizenship in the dimension of activity, this section is categorized into three modes of participation, namely, economic, social and political participation. With these three modes of participation in the center, the aim is to explore the converging and diverging practices and approaches of the actors in the triadic structure of international migration.

#### *Economic participation*

The issue of economic participation in the activity dimension of citizenship constitutes of migrants' participation in the economic life of the host country. Within the framework of the triadic structure, this section will assess sending and host states and migrants' perceptions and experiences in relation to economic participation in the context of Turkey.

To begin with, the majority of sending states share several ideas on migrants' economic participation in Turkey. The first common opinion stated by the consulates of Bulgaria, Georgia, Germany, Iran, Iraq, Russia, Turkmenistan, Ukraine and Uzbekistan is the difficulty of receiving work permits in Turkey. This challenge is represented as a major barrier that hinders migrants' participation in Turkey's workforce. Concerning economic

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<sup>45</sup> Interviews with Turkish state officials took place between September and December 2016 with numerous visits to their offices. Interviews with sending state officials took place between May and October 2016. Migrant interviews took place between March and December 2016.

participation, the Iraqi consulate stated, “all Iraqis are employed in Turkey, regularly or irregularly because they have to”. Secondly, most consulate officials hold the opinion that the acquisition of work permits is only achievable for “well-off businessmen” and thus, is dependent solely on the migrants’ financial situation. The third common opinion among sending state officials is that unless they receive citizenship, migrants cannot work in their professions in Turkey and are forced to apply for citizenship if they have long-term plans for Turkey. Here, this difficulty concerning professions is most emphasized by the German consulate official who described residence in Turkey as a “pause to life and career” for the German migrants.

Finally, except for the Iraqi and Georgian officials, none of the consulate officials are much concerned about their nationals’ economic situation in Turkey. In the case of Iraq, the official explained that Iraq encourages its nationals to integrate in Turkey in the economic sense because “there is not much Iraq to return to”. In the Georgian case, the consulate official underlined that they financially help Georgian citizens when they have severe economic difficulties and are in need of financial sources through a special fund. Except these two cases, the consulate officials create the impression that their nationals’ participation in the economic life in Turkey is not considered essential by sending states.

In response to the question whether dual citizenship acts as a barrier against or as a catalyst of integration, most consulate officials respond that citizenship is a requirement for residence in Turkey for migrants due to the difficulties of economic participation without citizenship. Interestingly, whether a migrant holds only Turkish citizenship or dual citizenship with the origin country is not considered as constituting a major difference in terms of migrants’ economic participation in Turkey. Even though whether a migrant has only Turkish citizenship or dual citizenship does not have an impact on integration, holding Turkish citizenship is perceived clearly as a catalyst of integration rather than a barrier against it in the viewpoint of sending states. Hence, not dual citizenship, but Turkish citizenship is the critical determinant of economic participation in the sending states’ viewpoints.

In terms of the host country interest in migrants’ economic participation, the sole concept emphasized by the Turkish state officials is that migrants “can stand on their feet through honest work” according to which the payment of taxes to the Turkish state is described as the key determinant. In terms of state responsibilities concerning migrants’ economic participation in Turkey, non-citizen migrants are distinguished from citizens.

Migrants, according to Turkish state officials, should already be self-sufficient if they plan to reside in Turkey and thus, no state responsibility is foreseen in terms of their economic participation. Concerning those who received citizenship, officials put forward that they are equal with Turkish nationals in the sense that they may benefit from state services to find suitable work. While migrants do not appear to represent an area of state responsibility in terms of economic participation, their inability to fulfill taxation duties hinders the acquisition of residence permit or citizenship. While this state approach towards economic participation equates migrants in terms of identity, still, the significant weight of economic participation signals the market logic, in line with Daniş and Parla (2009), as the reason behind the decrease in the priority of the Turkish background.

With regards to the question whether migrants' dual citizenship acts as a barrier against or catalyst for integration in Turkey, the *Head of General Directorate of Population and Citizenship Office of Turkey* stated that for a migrant “*to be rewarded with citizenship, the migrant needs to be already integrated in Turkey*”, in other words, the migrant should be self-sustaining in economic terms. Moreover, “*as long as a migrant lives in Turkey, the fact that the migrant holds dual citizenship with the origin country does not matter*”. With the understanding that asking migrants to give up their original citizenship is an outdated security measure, this top official holds the opinion that “*dual citizenship motivates migrants to work harder in Turkey*”. Hence, apart from seeing Turkish citizenship as the reward of successful integration in economic life, dual citizenship is considered as a catalyst of integration in Turkey because it motivates migrants' further economic participation.

Following the sending and host states, migrants involved in this study consider economic participation as the most critical issue for settlement in Turkey. For migrants, economic participation is incapacitated by the lack of citizenship in Turkey. Problems concerning economic participation hit directly at non-citizens' livelihood and are described as “*a vicious cycle in which no one gives a non-citizen a job and one cannot apply for citizenship unless he has a job*” (Ersin, male, 28, Turk from Bulgaria). Hence, citizenship signifies complete settlement into Turkey through economic participation and integration is understood directly as participation in economic life, overshadowing the other aspects of the activity dimension.

Many findings in this study reveal that economic participation in Turkey is migrants' key reason for citizenship acquisition. The most frequently mentioned reasons of citizenship acquisition in Turkey include, first, to end the obligation to work in unqualified or irregular

jobs due to employers who do not wish to go into the burden of work permits and thus, refuse to employ non-citizens. Here, Syrian nationals who face difficulties due to irregular employment consider citizenship as a means to receive their deserved payments from employers. The second reason is to be able to perform one's own profession in Turkey especially in lines of work such as law (*Natalie, female, 36, Russia*) or architecture (*Henrik, male, Germany, 38*). Finally, access to banking services such as credit card ownership and loans and entrepreneurship without the obligation of holding partnership with Turkish citizens are other frequently mentioned reasons behind migrants' will to receive Turkish citizenship.

Highlighting the impact of being a non-citizen on migrant lives, new graduates and students of foreign nationalities fear that they will be bound to work in unqualified jobs despite their university degree and after years of working in unqualified jobs that do not match with their education in Turkey, will be forced to return to their homelands when they face a problem with their residence permit. To illustrate, Ayten (31), a Turkish woman from Bulgaria, who is still unable to receive Turkish citizenship despite the fact that she came to Turkey 11 years ago as a student and is forced to work irregularly for less than minimum wage without insurance despite her university degree, regrets her migration to Turkey. The lack of citizenship and its consequences concerning employment, this Turkish migrant from Bulgaria explained,

*“caused the loss of my self confidence. I do not feel worthy as a human and it is like my life has been wasted in Turkey because of this citizenship issue. If I could go back in time, I would go to Europe. I came here because culturally this should be our homeland. I felt nothing here but a second-class human. I am second-class in Bulgaria because I am a minority. I am second-class in Turkey because they treat me so, because I am not a citizen. Where will the Turks of Bulgaria feel really at home?”* (Ayten, female, 31, Turk from Bulgaria).

In this light, economic participation in Turkey represents a critical mode of integration associated with citizenship acquisition. In a context where life without citizenship has detrimental impacts on life quality, holding Turkish citizenship is perceived as a savior from irregular employment and the possibility of exercising one's profession. Nevertheless, even though Turkish citizenship is a rescuer in terms of economic participation, the majority of migrants do not attach any extra economic benefit to dual citizenship.

Instead, in relation to dual citizenship, only a handful of migrants mention the possibility of dual retirement pensions as the sole economic advantage of this institution. Hence, dual retirement pensions are not a widespread economic advantage. Despite the fact

that the great majority of migrants clearly state they will not receive dual retirement pensions in the future, receiving their retirement pension from Turkey is still considered advantageous especially if they wish to return to their origin country in the future. In this regard, a Turkish migrant from Bulgaria sees the most positive outcome of dual citizenship as the retirement pension from Turkey, which in the future would be sufficient to spend his retirement years in Bulgaria without any financial worries even though he will not receive any pensions from Bulgaria (*Ahmet, male, 26, Bulgarian Turkish dual citizen*). Likewise, a Crimean migrant states that the retirement pension from Turkey may even allow buying real estate in Ukraine and pave way for high living standards in his retirement years (*Zahreh, female, 28, Crimean Tatar*). However, apart from the advantage of dual retirement pensions for a handful of migrants, dual citizenship is not considered as a particularly advantageous legal status.

With regards to the question whether dual citizenship acts as a barrier against or catalyst for integration, none of the migrants who received citizenship in Turkey can relate the difficulty of integration to dual citizenship. Instead, most migrants interested in Turkish citizenship and dual citizens involved in this study highlight that they are already forced to make full efforts to integrate in Turkey through employment. The general understanding is that, their integration in Turkey, considered mostly in terms of participation in economic terms, is obligatory. To illustrate, a Turkish migrant from Bulgaria stated: *“I do not think dual citizenship is a barrier against integration. I did my best to adapt here, work and be self-sufficient even though I could never know for sure whether I would be given citizenship”* (*Reyhan, male, 26, Turk from Bulgaria*).

The only migrant who creates the impression that dual citizenship may hinder a migrant's full integration in the host country in terms of economic participation is a Turkish migrant from Bulgaria who stated: *“I always think that if I cannot make good money somehow in Turkey, I can still be all right in Bulgaria. Likewise, if I cannot make it in Bulgaria, in terms of a financially good life, I can always return to Istanbul”* (*Hüseysin, male, 28, Bulgarian Turkish dual citizen*). Still, the fact that only one migrant involved in this research expresses this line of thinking demonstrates that dual citizens may not widely perceive the return to their origin country as a valid option and hence, see integration through economic participation as a crucial necessity.

Overall, several conclusions can be drawn in terms of economic participation in the activity dimension of citizenship in relation to dual citizenship in Turkey. Firstly, in the triadic structure than involves sending and receiving states and migrants in Turkey, most

importantly, this study shows that for all actors, integration in the host country is mostly a synonym to participation in economic life in Turkey. Secondly, in contrast to the sending country perspective according to which there is no linkage between dual citizenship and integration in the mode of economic participation, the host country perspective puts forward the positive idea that dual citizenship motivates economic participation. In other words, the Turkish authorities consider dual citizenship in terms of economic participation as a catalyst of integration even though it is still a requirement for citizenship. Thirdly, the host country perspective on the positive impact of dual citizenship is not completely parallel to the migrant perspective on integration. Even though migrants' participation in the economic life in Turkey is strongly linked with citizenship acquisition, migrants do not see a particular linkage between integration and the institution of dual citizenship. Hence, apart from the shared opinion that economic participation is the core of integration, there is no convergence between the stance of sending and host states and migrants on the relationship between dual citizenship and integration.

### *Social participation*

The assessment of how dual citizenship operates in the aspect of social participation in the context of integration requires the assessment of the sending and host states and migrants' viewpoints in relation to migrants' social participation in Turkey.

To begin with the sending states, social participation is not considered to be an important element on migrants' integration in Turkey. Here, the only consulates that pronounce the social aspect of migrants' residence in Turkey are the consulates of Iran, Bulgaria and Germany. To illustrate, the Iranian consulate official emphasized that as a result of Turkey's cultural proximity to Iran and the high number of Iranian nationals who reside in Turkey for long periods, their migrants have no difficulty in terms of integration. Likewise, the Bulgarian consulate underlined that Turkey represents a motherland to ethnically Turkish migrants from Bulgaria and their migrants' Turkish ethnicity facilitate social integration, as it is "*only Turks who move to Turkey from Bulgaria*". The German consulate officials, however, emphasize that social integration in Turkey requires citizenship because without citizenship, their "*migrants only lead a half life due to everyday challenges in Turkey without citizenship*". Except these three cases, the consulates of major sending countries in Turkey do not consider social participation as a crucial aspect of activity. In addition, among the sending countries, Germany is the only case where social participation is

considered in linkage with migrants' citizenship acquisition. Here, citizenship acquisition is perceived as a catalyst of social participation integration solely in the German case.

In terms of host state perceptions of migrants' social participation, in-depth interviews with officials demonstrate that social participation is synonym to "being respectful of laws" and "acting in line with Turkish culture". Considering the vagueness of these terms, one can draw the conclusion that unless they commit crimes, migrants' social participation is not regarded as a critical element. Moreover, Turkish officials do not consider dual citizenship to affect the social participation aspect of citizenship activity in the context of migrant integration.

In contrast to states that mostly do not perceive social participation to be critical in terms of participation, with regards to the migrants' opinions and practices, social participation is deemed as the second most problematic aspect in the activity dimension. For non-citizens, without citizenship, daily limitations described as "*not terribly big problems but small things that make you unhappy overall*" are coupled with the uncertainty of the future and the challenge of employment (*Celil, male, 41, Iranian Turkish dual citizen*). In Celil's case, this Azeri migrant from Iran explained that his son's prohibition from the local soccer team and wife's being denied access to municipality trips because they do not hold Turkish citizenship were seemingly minor experiences but caused deep unhappiness in the family. In parallel, an Iraqi Turkmen recounts that in her life before citizenship, she had constant difficulties ranging from yearly school registration, buying a phone card, receiving library books to opening a bank account and the obligation to explain her non-citizen status on daily basis to people such as a registration clerk at the local gym (*Sara, female, 26, Iraqi Turkish dual citizen*). In the light of these migrant statements, one can conclude that being a non-citizen seems to disrupt the chance of social participation in Turkey.

In this respect, the case of Syrian nationals should also be highlighted. The most frequent reason for Syrian migrants' interest in Turkish citizenship is to ensure that their children gain the right to receive education and not face discrimination at school. The statements below demonstrate the degree of discrimination Syrian migrants face in social life.

*"I would of course get Turkish citizenship if they gave it. Why not? Then the woman I talked to in the hospital for my baby's operation would not shout at me in the middle of people because I asked too many questions on the operation. If the hospital's secretary treats me like this, the people on the streets would spit on the public. If I had citizenship, we would be equals with them and no one would treat me like this. We live*



*in gecekondus and pay double. I will be the first to return to Syria when things settle and I will return running” (Döne, female, 26, Syrian).*

Similarly, in relation to discrimination in the social life in Turkey,

*“If we receive citizenship here, I believe they would treat us better. Lack of citizenship is a problem for the children. My son is very hardworking, he studies all the time and is really a good boy. But when he raises his hand in class, the teacher does not let him speak. He raises his hand and the teacher ignores him. If the teacher acts like that, how will the other people react? The teacher only cares about the Turkish children. Even if we get citizenship I doubt this would change. Once a Syrian, you will always be labeled as Syrian. I am pessimistic after all the mistreatment here. I will always want to return to Syria. We were all equals there” (Lina, female, 28, Syrian).*

As these findings disclose, not holding citizenship in Turkey may have detrimental impacts on migrants’ life quality in terms of social participation in Turkey. Life without Turkish citizenship creates *“feelings of otherness and in-betweenness”* which leads to *“depression because of the simple but suffocating challenges continuously faced in every day life”* (Sara, female, 26, Iraqi Turkish dual citizen). As an Assyrian migrant from Iran sadly admits,

*“This citizenship issue cost me my life in Turkey. If I were given citizenship soon after my entrance, I would have had a good, stable job here. So many years were just gone for nothing. I was an ambitious person when I first came to Turkey. I was a young nurse and I had hope that I would go up in my profession. This was never realized. Instead, I became just a translator for Iranians. This way, my citizenship problems and residence status shaped my whole life” (Katrin, female, 38, Iranian Turkish dual citizen).*

Another migrant holding a residence permit reveals how her identity as a human rights activist is restrained and her character is forcibly changed as a result of being a non-citizen in Turkey:

*“I am no longer an activist in Turkey as I was in Iran. I cannot call myself an activist because I am silent at so many things now. The terrible things I witness here done to the Syrians... If I were in Iran, I would shout at people. But here, I may also be discriminated because I am the other. As the other, it is not easy to defend others. If I were a citizen, it would be different” (Mona, female, 30, Iranian).*

Consequently, the positive impacts of citizenship on social participation are also clear. As stated by an Iraqi Turkmen:

*“The day I received citizenship was an amazing day to remember. I remember looking at my identity card like I was looking at a lover’s photo. Turkish Citizenship means a lot to me, it is very valuable thinking all the problems I faced when I did not have it. I waited for it since I ever went to a school. I walked a different type of walk. When people asked me why I walked like I owned the street, I laughed said I am a Turkish citizen now. Everybody noticed the change in my character and how I became self-confident. I am like every other person in Turkey now” (Sara, female, 26, Iraqi Turkish dual citizen).*

Despite the positive impacts of receiving Turkish citizenship on social participation in Turkey, none of the dual citizens mention the impacts of dual citizenship in this aspect. Possibly because most dual citizens do not consider returning to their origin country, maintenance of original citizenship is not considered in relation to social participation in Turkey.

Nevertheless, it is interesting that the only social aspect of dual citizenship that is pronounced in migrant statements is the issue of social prestige attached with dual citizenship. With regards to the prestige involved in holding dual citizenship, opinions differ based on the origin country. To illustrate, regardless of Azeri origin, Iranian- Turkish dual citizens often find themselves to be more prestigious than Iranian mono-citizens. Interestingly, an Iranian-Turkish dual citizen, Menekşe (38), pointed out that she feels less prestigious compared to Turkish mono-citizens because citizenship by birth is more prestigious than acquisition. She elaborates this feeling in linkage to the discrimination her son faces at primary school due to being “labeled as a foreigner”. Despite the fact that her seven-year old son speaks fluent Turkish and has Turkish citizenship through descent from his Turkish father, he is subject to discrimination because he was born in Iran to an Iranian mother. In parallel, Iraqi-Turkish dual citizens perceive themselves as better advantaged to mono-citizen Iraqi nationals and as Iraqi citizenship is not perceived as an asset by itself, state that the advantage of dual citizenship comes from Turkish citizenship due to better chances of mobility in the world.

In contrast to these examples of migrants who consider their Turkish citizenship to be more advantaged than their original citizenship, Bulgarian- Turkish dual citizens consider their citizenship status as more prestigious compared to both Bulgarian and Turkish mono-citizens. Compared to Bulgarian citizens, their living standards are higher in Turkey, which is “*a country with a developed economy and better employment opportunities and with free visa access to seventy countries*” (Asım, male, 29, Bulgarian Turkish dual citizen). Compared to Turkish citizens, Turks from Bulgaria feel more advantaged due to Bulgaria’s EU membership, which allows visa-free mobility across Europe.

*“If we think of it realistically and strategically, I think my situation is better than yours because you, as a Turk, cannot go anywhere without a visa and you have to wait and pay a lot. For me, I can travel easily wherever I want. But at the same time, I am doing much better in Turkey than I would in Bulgaria because the life conditions here are much better than Bulgaria where it is really hard to make a living. In that sense, I am much better off than both Turks and Bulgarians, because I get to use the best sides of each citizenship” (Sabri, male, 25, Turk from Bulgaria).*

Thus, the state of dual citizenship in this community is described as “*living away from the economic problems in Bulgaria while not losing the Europeanness brought from Bulgaria*” (Ahmet, male, 27, Bulgarian Turkish dual citizen). Here, a Bulgarian citizen placed himself “*at the same level with Germans or French*” (Reyhan, male, 26, Turk from Bulgaria). Hence, while the acquisition of Turkish citizenship is considered to have major positive impacts on social participation, the only social issue attached with dual citizenship is the social prestige it accompanies.

In light of these findings, a few conclusions can be drawn in relation to social participation aspect of citizenship in the context of dual citizenship. Firstly, social participation remains overshadowed by economic participation that is received as synonym to integration by all the actors in the triadic structure. Moreover, Turkish officials add other notions such as being respectful to laws and acting in line with Turkish culture in their description of integration. Secondly, neither sending state officials (except in the German case) nor host state officials consider a major connection between the acquisition of citizenship and social participation. Instead, in the sending country perspective, other issues such as ethnicity, the presence of a high number of their nationals in Turkey and cultural proximity are received as facilitators of integration. Thirdly, none of the actors of international migration in the context of Turkey see a connection between dual citizenship and integration. Here, even though migrants hold the opinion that citizenship acquisition in Turkey enhances social participation, dual citizenship is not believed to have any impacts on integration except social prestige.

### *Political participation*

To explore how dual citizenship operates in the political participation aspect of the citizenship dimension of activity, this section will assess the positions of sending and host states and migrants in relation to migrants’ political participation in Turkey. Even though the opinions on dual political participation are partially assessed in the prior chapter as an aspect of citizenship as status with the question whether dual citizenship leads to a paralysis of formal citizenship, the core aim in this section is to shed light on the question whether dual citizenship acts as a barrier or catalyst of integration.

As assessed in the prior chapter, in-depth interviews with sending state officials demonstrate that the aspect of political participation in the activity dimension is not considered an important matter in terms of integration. Hence, political participation is

considered of importance neither as a barrier against or facilitate or of integration. To continue with the host country perspective, Turkish officials consider political participation not as a right or an element of integration but instead, duty. Within this frame, dual citizenship is not considered in relation to integration in Turkey in the host country perspective.

At the individual level, interviews disclose that access to political participation remains as a non-issue due to the challenges migrants face concerning their economic and social participation, which overshadow political participation. In linkage to this thinking, dual citizenship appears to affect integration neither as a catalyst nor as a barrier in terms of political participation. However, two distinctions should be made.

First, as examined in the prior chapter, migrants with Turkish minority membership in their origin countries, namely ethnically Turkish migrants from Bulgaria, Iraqi Turkmens and Azeri migrants from Iran regardless of their citizenship status are often politically active. For these migrants, voting in elections clearly constitutes a critical aspect of integration. For Iraqi Turkmens and Turkish migrants from Bulgaria, participation not only in elections but also in migrant associations is widespread. Hence, Turkish minority membership is a critical determinant of political participation.

The second distinction concerns non-citizens' settlement plans in Turkey. Unlike the migrants who plan to return to their homelands in the future and thus, do not mind the challenges of life without citizenship despite the long years they spend in Turkey, migrants who plan to spend their entire lives in Turkey described the lack of Turkish citizenship as a difficult state in which no long-term plans can be made due to the cancellation risk of residence permits. Due to frequent legal changes and the uncertainty of this process, many migrants agree on Turkey's unwillingness concerning permanent migrants. This negative opinion is also strengthened due to experiences with state officers who *"look down at residents as second class people because they are not citizens"* (Ömer, male, 26, Iraqi Turkmen). Hence, the first feeling attached to lack of citizenship in Turkey appears to be a strong sense of insecurity and one of *"constant anxiety"* (Iris, female, 51, German). Migrants' statements demonstrate the level of challenge in terms of security that does not allow the political participation aspect of the activity dimension of citizenship to be visible.

*"Turkey does not willingly accept migrants. It does not act like a migrant receiving country. It is neither safe nor steady for a migrant. One change in the law and you are out the door. One change in the law, then your whole life's direction changes. I do not*

*feel secure here. This is why I cannot make any long-term plans. But I know I am not able to go back to Iran because I was an activist. I know I should be looking for a third country” (Mona, female, 30, Iranian).*

Likewise,

*“In Turkey, you can never be completely in peace if you do not have citizenship. There is no guarantee to anything. You may find yourself out the door after policy changes. Plus, my life is here with my children. I cannot risk such things. Once there was a problem and I had to wait for 11 months for the renewal of the residence permit. Can you imagine? How could I not apply for citizenship? I was forced to apply for citizenship” (Diyar, male, 44, Iraqi Turkish dual citizen).*

However, it should be noted that, not only non-citizens who face major stress due to lack of citizenship and thus, may not be interested in political participation, but also dual citizens are generally disinterested in political participation in Turkey.

Apart from the impacts of minority membership on political participation and migrants’ general disinterest towards this activity, the most visible element in relation to politics found in this research regards the exit option provided by dual citizenship. For several migrants from Iran, dual citizenship is regarded as a safety net in the Middle East due to *“political problems, wars and clashes and because everyone may need a second place to escape” (Menekşe, female, 38, Iranian Turkish dual citizen)*. Similarly, an Iranian national willing to receive Turkish citizenship perceives dual citizenship as critical for human rights activists in the region as an easy exit to escape from state pressure (Mona, female, 30, Iranian). Here, state pressure is regarded as a two-sided matter- both from Iran and Turkey and hence, the exit option is not only considered as an escape from Iran, but also to Iran away from the Turkish state pressure.

Within this frame, returning to the key question of where political participation stands in terms of integration and how dual citizenship operates in this aspect of the activity dimension in the viewpoint of migrants, political participation seems a distant subject not only for non-citizens, but also for the majority of dual citizens. Still, it should be noted that political participation is the only area of integration that reveals a great disparity among migrants. Here, despite the general disinterest in political participation, ethnically Turkish migrants put forward a major interest in participation in the political life of Turkey.

Overall, several points of convergence and divergence come to light with regards to political participation. To begin with, neither sending nor host states consider political participation as a critical issue of integration in Turkey. Hence, the states’ position concerning dual citizenship’s linkage to integration in the area of political participation can

be described as ineffectual. This position is also shared by the majority of migrants who do not consider this issue as a matter of concern. However, the research also reveals a great divergence among the opinions and experiences of migrants. As the only mode of participation that displays such diversity among migrants, the interest of Turkish minority members in the political lives of both their origin countries and Turkey constitutes a great contrast the majority of migrants involved in this research. Nevertheless, political participation is still overshadowed by other modes of participation.

## **6.2 Citizenship dimension of identity**

The second focal area to examine whether dual citizenship acts as a barrier or catalyst of integration in the context of Turkey is the citizenship dimension of identity. Leaving behind the dimension of activity that involves economic, social and political modes of participation in the host community, the citizenship dimension of identity represents the feelings of belonging, emotional attachment and loyalty to the host country as its key elements (Carens 2000, 166). To assess how dual citizenship functions in the citizenship dimension of identity and affects integration based on the perceptions and experiences of the actors in the triadic structure, this section is categorized based on the most distinguishable elements of identity in the Turkish context, which are ethnicity, nationality, religion and finally, gender.

### *Ethnicity*

In the assessment of the first actor of the triadic structure, the divergence of viewpoints among sending states appear to be dependent on whether a sending country consists and accepts the presence of an ethnic Turkish minority. In such sending states, Turkish ethnicity is considered as a key element in both citizenship acquisition processes and integration in Turkey. To illustrate, the Bulgarian and Iraqi Consulates perceive their ethnically Turkish migrants' access to Turkish citizenship as a natural right and a result of belonging. Demonstrating the weight of ethnicity, these consulate officials see Turkey as a natural homeland for ethnically Turkish migrants and hence, consider migrants' primary country as Turkey instead of the origin country. Here, it should be highlighted that, except Bulgaria and Iraq, the other countries with ethnically Turkish minorities, namely Iran and Ukraine, ignore the subject of ethnicity possibly due to their domestic minority policies and act like the element of Turkish ethnicity does not exist in their migrant population. To

continue, consulates of states with no Turkish minorities do not consider migrants' ethnicity as a source of identity that affects integration neither positively nor negatively. In point of fact, the finding that the majority of consulates disregard the notion of ethnicity appears to be also valid for Turkic countries, namely Azerbaijan, Turkmenistan and Uzbekistan that have "Turkishness" as their dominant identity.

Furthermore, despite the emphasis by the Bulgarian and Iraqi consulates on the ethnically Turkish migrants' "return to homeland" in Turkey through citizenship, other sending country officials' perception is more in the direction of pragmatic reasons for their nationals' interest in Turkish citizenship. In this sense, the majority of sending states perceive Turkish citizenship as disconnected from any source of ethnic identity that their nationals may hold and instead, consider migration to Turkey solely in linkage to pragmatism and in terms of economic benefits. In parallel, in cases of dual citizenship, countries with no Turkish minorities or that do not accept their presence such as Ukraine and Iran, consider migrants' origin country as the principle country.

In the host country perspective towards ethnic identity, this research reveals two important findings. First, ethnicity does not constitute an important element during acquisition. Even though acting in harmony with the Turkish culture and traditions are key elements of integration and a prerequisite for all migrants applying for citizenship regardless of their ethnicity, these elements do not exclude non-Turkish migrants. Instead, acting in line with Turkish culture appears to function mostly in relation to authenticity of marriages with Turkish nationals. In cases of marriage, the applicant- often depicted as a woman by the Turkish authorities, is considered to be in harmony with the Turkish culture if she has not exercised prostitution during the course of her marriage.

Despite that Turkish ethnicity does not appear as a particular advantage during the citizenship acquisition process, the second finding in this research is that dual citizenship is managed in direct relationship with migrants' ethnicity. As the findings of the interview with the *Head of General Directorate of Population and Citizenship Office of Turkey* reveal, migrants with non-Turkish ethnicity may be asked to give up their original citizenship and hence, may not be allowed to hold dual citizenship with Turkey. In contrast, migrants whose Turkish ethnicity is confirmed through their names and places of origin are never asked to relinquish their original citizenship. Hence, the advantage of Turkish ethnicity appears more vividly in the toleration of dual citizenship.

In light of these findings, the traditional advantage of Turkish ethnicity in the citizenship process remains solely in the tolerance towards migrants' dual citizenship. In other words, Turkishness is an essential factor not in the acquisition process but in the state's tolerance towards the maintenance of migrants' original citizenship. This finding is only partially in line with Parla's (2011) findings that ethnic privilege is mostly eliminated in the citizenship acquisition process. Despite the equality among migrants in the acquisition process, the finding that the maintenance of original citizenship and hence dual citizenship is invariably allowed for ethnically Turkish migrants signals that the weight of Turkish ethnicity is consolidated through the institution of dual citizenship. In this regard, this study takes Parla's findings one step further and locates the importance attached to ethnicity not directly in the acquisition process but in relation to the toleration of dual citizenship. In point of fact, this tolerance may reveal Turkish state's intention to intensify power beyond its borders through its dual citizens in the Turkish world as opposed to security concerns in relation to non-Turkish migrants' maintenance of dual citizenship.

Leaving behind the sending and host states, the ethnicity aspect of the citizenship dimension of identity most frequently appears in the statements of migrants who are members of ethnically Turkish minority in their origin countries. For these migrants, belonging to Turkey and Turkish culture is a fundamental reason for interest in Turkish citizenship. Several migrants in this group underline their disinterest in the pragmatic benefits of Turkish citizenship such as a passport for international travel because it is "*only a minor benefit of the sacred Turkish citizenship*" (Sevinç, female, 33, Iranian Azeri). To emphasize her disinterest in such a practical benefit, an Azeri migrant from Iran highlights her belonging to Turkey by saying "*I had Atatürk's picture in my room since the age of 16*" (Sevinç, female, 33, Iranian Azeri). Another Azeri migrant from Iran describes his settlement in Turkey as "*a return to ancestral lands*" (Salifov, male, Azeri, 42, 2013). In contrast to Turkish minority members, other migrants involved in the study highlight no such emotional reasons behind their interest of Turkish citizenship.

Despite the fact that ethnically Turkish migrants with minority membership in their origin country regard Turkish citizenship as a natural right, migrant interviews also reveal frustrations because Turkish ethnicity is not perceived to be a facilitating element for citizenship acquisition in the last two decades. Instead of Turkish ethnicity, most migrants believe that the Turkish state considers an applicant's ability to pay for the expenses of the citizenship process, more specifically the monthly social insurance and residence permit fees



as the most critical factor. Thus, despite the possible advantages of shared culture and ethnicity in integration and their emphasis on belonging, ethnically Turkish migrants do not see their life in Turkey as completely accessible and straightforward. A Bulgarian-Turkish citizen who settled in Turkey approximately ten years ago, states that:

*“I cannot label what we go through in Turkey as discrimination. But I feel forced to explain and prove my Turkish identity everywhere I go in Turkey. In Bulgaria, they used to call me the Turk. In the dormitory here, they called me the Bulgarian. This made me very upset. Still, I know I am a Turk. I even have a certificate of Turkishness, do you? I realize that Turks are jealous of us. First, we entered their universities with very easy exams although they tried for years to enter those departments. Second, they are jealous of our visa free travel because for them this is like a miracle or something. They think we do not deserve such a right when they do not have that right because we are all Turks. However, I should confess that some Bulgarian Turks who came here as small children, drop their Turkish citizenship to access to universities easily and then get back Turkish citizenship in six months” (Hüseyin, male, 28, Bulgarian Turkish dual citizen).*

A more detailed analysis demonstrates the pessimism of some migrants who perceive a decrease in the value of Turkish ethnicity compared to the past. For many Turks from Bulgaria and Iraqi Turkmens, change in time- from being prioritized in Turkey’s citizenship policies to being ignored is a critical element. In other words, Turks from Bulgaria and Iraqi Turkmens often believe they have lost value as migrant groups. In addition, even dual citizens from these communities believe that the value of ethnicity is diminished recently due to Turkey’s Syrian politics. According to migrant statements, in the 1990s, all migrants from these two communities who entered Turkey received citizenship without difficulty. A Turkish migrant from Bulgaria expresses her discontent on the change in Turkey’s citizenship policies.

*“Those Bulgarian Turks who came very early, they were kings here with all the state services available to them. But those who came later, like me, suffer a lot because of the change in Turkey’s mind and also because Turkey receives migrants in high numbers today. Both residence permit and citizenship are generally hard, expensive and complicated in Turkey I think. There are so many illegal Bulgarian Turks here because of the disadvantages in laws. And I would definitely say that Bulgarians are not high in the ranks of migrants compared to Syrians” (Ayten, female, 31, Turk from Bulgaria).*

To continue, while the diminishing value of ethnicity is emphasized by many Turkish migrants from Bulgaria, the “amnesty of 2011”, as migrants call it, is greatly appreciated in this community because, *“in 2011, being Turkish was suddenly an advantage reserved for Turks from Bulgaria and it came at a time when nobody thought that Turkey was giving any importance to this group” (Asim, male, 29, Bulgarian Turkish dual citizen).* In this study, all

the Turkish migrants from Bulgaria who received Turkish citizenship benefitted from this regulation despite the “*false rumors that university students would lose their scholarship and all male applicants would be sent to the military and the lack of information from the state authorities*” (Asım, male, 29, Bulgarian Turkish dual citizen). Based on migrant accounts, citizenship acquisition in 2011 required solely the submission of several documents including a birth certificate and family registry to be received from the state authorities in Bulgaria and a written proof of Turkish ethnicity from a Turkish Bulgarian non-governmental migrant organization in Turkey. Accordingly, all applicants received automatic citizenship in approximately eight months following the submission of documents without being interviewed in a Citizenship Committee.

Nevertheless, this regulation is regarded as a one-time success for a “five month open door policy” of the Bal-Göç (*Association of Culture and Solidarity for Balkan Migrants*), a migrant organization based in İzmir, founded by migrants from Bulgaria. Hence, the regulation is perceived more as their community’s success rather than Turkey’s positive attitude towards the migrant community. The fact that some migrants missed the 2011 regulation because they were not informed by the authorities despite their regular contacts with the foreigner’s police strengthens migrants’ opinion that the Turkish state is indifferent towards Turkish migrants from Bulgaria. Moreover, those who applied for Turkish citizenship and received it through this regulation point at the injustice faced by other migrants with the same profile in the same community who did not apply in 2011 and still have not received citizenship until today. Thus,

*“Before 2011 and also after that year, many people obeyed all the rules and got rejected many times or waited for long years to get a positive answer. So we can not conclude that Turks are advantaged in Turkey after seeing all this”* (Sabri, male, 28, Bulgarian Turkish dual citizen).

Similar to Turkish migrants from Bulgaria, Iraqi Turkmen share the opinion that their privileged position in the 1990s diminished in years. Migrants in this community often mention that a Turkish identity card received from the Iraqi Turkmen organization based in Istanbul that facilitated the acquisition of residence permit and citizenship are no longer effective in these processes. Moreover, Turkish ethnicity became even a disadvantage due to Turkey’s strategy to keep Turkmen in Iraq in order to maintain political influence in the area. An Iraqi migrant of Turkmen ethnicity underlined that Turkey’s interest in the EU accession resulted in the equalization of all migrants regardless of their ethnicity (*Diyar,*

male, 66, Iraqi Turkish dual citizen). This treatment creates frustration among Iraqi Turkmen. Illustrating this disappointment, an Iraqi Turkmen explained:

*“Once upon a time, it might have been an advantage to be a Turkmen in all these processes. Now it is certainly not. Turkey is my homeland, Iraq’s Turkmen lands Türkmeneli are also my home and Iraq is where I was born. Those lands are Turkey’s backyard. Turkey’s strength should be felt in its backyard. We call Turkey our father but we do not see any fatherly treatment here. This is unfortunate. Still, we can never criticize Turkey. One cannot criticize his father, that would be wrong” (Diyar, male, 66, Iraqi Turkish dual citizen).*

In contrast, Iranian Azeris and Crimean Tatars from Ukraine do not make a comparison with the past when thinking of Turkey’s treatment of migrants with Turkish ethnicity and simply underline that their ethnicity is not an advantage in Turkey. To illustrate, an Azeri migrant from Iran summarized Turkey’s disregard for Azeri migrants by saying *“when the Turkish state says “two countries, one nation” for the Azeris, it is all a big lie” (Ramin, male, 43, Iranian)* and does not realize a change in Turkey’s policies in this regard. Feeling dissatisfied because their ethnicity does not facilitate Turkish citizenship, Azeris from Iran emphasize their cultural links with Turkey similar to Turks from Bulgaria and Turkmen from Iraq. According to an Iranian national of Azeri ethnicity,

*“They call us here as Azeris, we hate this. We are Turks. I share the same nostalgia with you. Tell me something from the 90s of Turkey, I have with you the same feelings. Say Barış Manço for example, I miss him. Cartoons, TV series, I know all of them. This is my country because I speak the language of this country. Of course I belong here because this is the country of my mother tongue. We, Turks of Iran, have the same legends of Turks in Turkey. This is my nation with a common culture. But this common culture has no positive impact on citizenship applications” (Sevinç, female, 33, Iranian).*

Likewise, the majority of Crimean Tatars from Ukraine, even though they are not equally interested in citizenship, do not believe their ethnicity could be an advantage in citizenship acquisition. With the opinion that Crimean Tatars are not a known group in Turkey, they criticize the questions on their Muslim faith and ethnicity, underlining that Turkish people in Turkey lack knowledge on Turks living elsewhere. Crimean Tatars have the opinion that they would be treated equally with non-Turkish migrants in case they apply for citizenship because they are not advantaged in residence permit processes. The following statements by two Crimean Tatars from Georgia demonstrate this perspective.

*“We watch Turkish TV channels, we watch Erdoğan, we listen to Koran. We are not interested in the Russians, we are Turks. Of course it should be easy to get Turkish citizenship. All Turks come here, Bulgarian, us. But I doubt it would be easy” (Gülşen, female, 73, Crimean Tatar).*

*“Here they do not recognize Crimean Turks. They do not know anything about us, not even if we are Muslims. We do not have any special treatment, we are like everyone else” (Nermin, female, 48, Crimean Tatar).*

Hence, all ethnically Turkish minority members share the ideas of belonging to Turkey, but also highlight Turkey’s disregard towards them.

Apart from the emphasis on the feelings of belonging with regards to citizenship and integration in Turkey, in the assessment of citizenship identity, loyalty is also a very frequently mentioned notion in relation to the ethnicity aspect of identity for these migrant communities. In point of fact, all ethnically Turkish minority members bring up the concept of loyalty with the aim to compare themselves with non-Turkish migrants and highlight that they deserve to be valued more than other migrants. It should be noted that among all the migrants involved in this study, including the ethnically Turkish migrants, the only ones who bring forward the notion of loyalty to Turkey are minority members.

Demonstrating the impact of ethnicity in terms of loyalty to the host country, the great majority of Turkish migrants highlight that their loyalty to Turkey is greater than to their origin country. To illustrate, an Iraqi migrant states: *“We were Turks in Iraq, we are Turks in Turkey. Our loyalty is towards Turkey at all times”*(Şahin, male, 28, Bulgarian Turkish dual citizen). Moreover, most migrants with Turkish ethnicity explain that they would side with Turkey in case of a war between their two countries of citizenship.

*“Concerning loyalty, I do not think it is very likely in our times that two countries such as Bulgaria and Turkey would go into war. In case of such as a war scenario, I would support Turkey because I am Turkish. I would not fight for Bulgaria, because I am not Bulgarian” (Reyhan, male, 26, Turk from Bulgaria).*

Within this frame of ethnicity and integration where ethnicity determines dual citizens’ main country of citizenship, dual citizenship does not appear as a core source of identity in the statements of ethnically Turkish minority members. Prioritizing their host country citizenship, these migrants take their original citizenship for granted as a source of identity. Here, the same migrants who emphasize that their loyalty lies with both countries also highlight that they do not remember their original citizenship except times of travel. In this regard, one Iraqi Turkmen states: *“I do not even remember I have dual citizenship unless I am asked. I do not use the Iraqi one and I feel like an ordinary Sivasian of Turkey (Sara, female, 26, Iraqi Turkish dual citizen).* In contrast, statements by dual citizens without Turkish minority membership do not disclose an emotional value attached to Turkish citizenship.

Overall, a few conclusions summarize the viewpoints on ethnicity, integration and dual citizenship. To begin with, sending states diverge on the issue of ethnicity. While the majority of sending states disregard the issue of ethnicity, some sending states with Turkish minorities, namely Bulgaria and Iraq, consider ethnicity as the main reason of migration and integration. Still, not all sending states with Turkish minorities follow the same lines. Here, Iranian and Ukrainian officials ignore the presence of Turkish minority among their nationals. Hence, one can conclude that where Turkish minority is recognized, dual citizens' main country of citizenship is considered as Turkey because ethnicity is received as the fundamental factor of integration. Where not, the primary citizenship country is still considered as the origin country despite migrants' dual citizenship.

Secondly, the Turkish state considers migrants' accordance with Turkish culture as a key component of integration and citizenship acquisition even if these vague concepts do not constrain citizenship to solely ethnically Turkish migrants. Nevertheless, dual citizenship is more strictly restrained for this community because non-Turkish migrants may be asked to relinquish their original citizenship to acquire Turkish citizenship. Hence, despite a more equalitarian approach towards the citizenship acquisition process, Turkey's preferential tolerance for ethnically Turkish migrants reveals Turkey's consolidation and solidification of the importance attached to ethnicity at the level of dual citizenship.

Along these lines, the determinant factor in terms of belonging and loyalty appears as Turkish minority membership in the origin country. Here, ethnically Turkish minority members from Bulgaria, Iraq and Iran emphasize their ethnicity, loyalty and belonging to Turkey but feel frustrated because their emotional attachment to Turkey is not reciprocated by the Turkish state. As these migrants' dominant interest is on Turkish citizenship and dual citizenship is not considered as a particular advantage, Turkey's invariable tolerance of dual citizenship for ethnically Turkish minorities goes unnoticed by migrants. Finally, it is the element of ethnicity in the identity aspect of citizenship that determines a migrant's primary country of citizenship where only ethnically Turkish migrants with minority membership consider Turkey as their principal country.

### *Nationality*

Following the findings on the impact of ethnic identity with regards to dual citizenship, this section focuses on the question of how the aspect of nationality in the citizenship dimension of identity works in the context of dual citizenship and whether dual

citizenship works as a barrier against or a facilitator of integration in terms of nationality. In the triadic structure that involves host and sending states and migrants in the context of Turkey, the divergence of opinions on the issue of nationality draws attention.

To begin with, none of the consulates among the top sending states to Turkey consider nationality as an important factor in the Turkish citizenship process. To continue, consulate officials also do not regard the element of nationality in the context of dual citizenship neither to facilitate nor hinder integration.

In terms of host country perspectives, the notion of nationality appears in the form of “Turkishness”. Here, migrants who come from the Turkic countries of Azerbaijan, Turkmenistan and Uzbekistan are considered as migrants with Turkish nationality. Parallel to ethnicity, the element of nationality does not necessarily facilitate Turkish citizenship. However, similar to the case of ethnically Turkish migrants from Iran, Iraq and Bulgaria, dual citizenship of migrants from Turkic countries is invariably tolerated. In this regard, nationality evolves into a key element concerning the institution of dual citizenship and to consolidate the importance attached to “Turkishness”.

To follow, in migrant statements, the issue of nationality appears in three modes. The most frequent usage of national identity is, again, in relation to “Turkishness”. The second common usage of nationality is in relation to cultural proximity as an advantage in terms of integration in Turkey and appears solely in relation to Iranian nationality which is frequently assumed to be culturally close to Turkey. Finally, the notion of nationality appears in relation to the Syrian nationality as, interestingly, all non-Syrian migrants conceive the mass Syrian migration as a milestone for migrants in Turkey and describe their position in the host country in relation to Syrian migrants.

To begin with the issue of Turkish nationality, migrants from Azerbaijan, Turkmenistan and Uzbekistan have the opinion that their nationality is ineffective in terms of citizenship acquisition in Turkey. According to this commonly shared idea, even though their knowledge of Turkish language helps in terms of integration, nationality brings no extra advantages in terms of the relationship with the Turkish state. In this regard, a female migrant from Azerbaijan clearly expresses “*the value of our Turkishness does not go beyond a tick in the language box of the application form they fill in the Turkish citizenship interview and anyone who learns Turkish in one year is same with us in the state’s eyes*” (Soltan, female, 42, Azerbaijan). Turkic migrants do not consider their nationality to be an advantage

in receiving Turkish citizenship and moreover, they are unaware of the state's toleration of dual citizenship. More specifically, as migrants are generally unaware of states' dual citizenship policies and the maintenance of dual citizenship, similar to the case of ethnically Turkish migrants with minority membership in their origin countries, Turkey's dual citizenship tolerance for Turkish nationals goes unnoticed by migrants.

Secondly, besides "Turkishness", cultural proximity in relation to nationality also appears a powerful facilitator of integration. To illustrate, an Iranian migrant with no Azeri ethnicity emphasized cultural proximity with Turkey as a reason for interest in citizenship by stating:

*"Turkey is culturally close to me, I feel at home here. This is like Iran but without the mullahs. In Iran, you feel a lot of every day pressure on you politically. You have to wear the veil and if you have a daughter you know she will also have to use the veil. Here I do not feel such pressure"* (Menekşe, female, 38, Iranian Turkish dual citizen).

However, cultural proximity of Iranian nationality is not perceived as an advantage in the relationship with the Turkish state, neither in citizenship acquisition nor dual citizenship. Hence, the sole advantage of Iranian nationality remains in the area of social integration as a facilitator.

The third issue in relation to national identity in the migrants' viewpoint, is the presence of Syrian nationals. To begin with, the great majority of non-Syrian nationals share the opinion that the presence of Syrian migrants in Turkey has harmed them in a number of ways. Accordingly, first, the mass migration from Syria created a high public sensitivity and mostly a negative image of foreign migrants in the general public. This new negativity, which arose in the last five years, prevents the full integration of non-Syrian migrants in the society. To illustrate, an Iranian-Turkish dual citizen, explains that her seven year old son does not like school *"because he is treated like a Syrian"* due to the fact that *"the numbers of Syrians increased and increased so much now that people think all foreigners are Syrians and they treat them as Syrians"* (Menekşe, female, 38, Iranian Turkish dual citizen). In this case, while the child was not discriminated in the school as a foreigner prior to Syrian migration into Turkey, following the registration of several Syrian children in the school, he was instructed to sit with Syrian children at the back of the class, which enhanced his image as a migrant and became a barrier against mingling with Turkish children.

Next, according to most non-Syrian migrants involved in this study, the increased numbers of migrants from Syria forced the systematization of residence and citizenship

regulations in a more restrictive direction, which acted as a disadvantage for migrants' residence in Turkey. According to an Iranian labor migrant with Azeri origin who recently applied for citizenship, *"without a strict, working system, you could achieve some things easily if you have good relationships with people in state offices because there was no legislation"* (Celil, male, 41, Iranian Turkish dual citizen). In line with this, Iraqi Turkmen migrants involved in this research often state that their residence permits are no longer easily renewed due to the mass migration from Syria. With a similar thinking, a Turkish migrant from Bulgaria stated that she does *"not understand how Syrians are so much valued although Turks here and are completely ignored. Even Syrians get citizenship easier than Bulgarian Turks"* (Ayten, female, 31, Turk from Bulgaria). Many non-Syrian migrants also mention that with this recent systematization, the nature of the key state organization for migrants has also gone through a shift. While officers in the Directorate General of Migration Management were, until recently, police officers, they were changed to civil officers. This, however, according to one migrant with legal background, contributed to the *"paralysis of the bureaucracy"* as the effective command relationship between officers now ceases to exist. Overall, in addition to their *"chronic ignorance"* of migration related legal framework of their work, *"officers now do not even take orders from higher officers, leading to even a deeper chaos"* (Natalie, female, 36, Russia).

Moreover, non-Syrian migrants involved in this research raise questions concerning equal access to rights. Being categorized together with Syrian migrants is often considered degrading, as they perceive Syrian migrants to be freeloaders. Here, an Iranian-Turkish dual citizen highlights that he should not get the same treatment with Syrian migrants because he is a taxpayer and a legal resident since 2008. Perceiving Syrians to be unjustly receiving financial state support and holding superior rights in access to residence permits and citizenship *"as the top community in a hierarchy of foreigners in Turkey"*, an Azeri migrant from Iran believes *"it is irrational that temporary identity card holders get better services than citizens because they should be getting less than citizens"* (Celil, 41, male, Iranian Turkish dual citizen). These negative feelings are accompanied by an atmosphere of distrust and disdain towards Syrian migrants. To illustrate this negativity, one migrant stated:

*"all covered and very uneducated, Syrians contributed to the religious conservatism in Turkey because of their high numbers. If they continue to increase, they are going to turn this country to Iran from which I ran away to Turkey due to this religious conservatism"* (Menekşe, female, 38, Iranian Turkish dual citizen).



In contrast to the widespread opinion that Syrian nationality is the top nationality in the hierarchy of migrants, several migrants have highlighted that the existence of a high number of migrants from Syria elevated their status in the Turkish society. According to an Iranian migrant,

*“Iranians climbed up the ladder when Syrians came to Turkey. Syrians are so unwanted in Turkey by the state officers and on the street by the public that suddenly Iranians became the wanted foreigners. The police officer that mistreats them, says to me we are brothers as Turks and Iranians. He did not say that when I first came. When I first came, I did not feel like I could completely belong here because Iranians were not seen well. Iranians are better than Arabs now” (Mona, female, 30, Iranian).*

Moreover, several migrants agreed that residence permit and citizenship acquisition in the past were more difficult due to the lack of a well-functioning system before the Syrian migration. A Crimean Tatar finds the residence permit process to be much easier today because it is *“all about the money”* in comparison to the past when a migrant *“would have to go to the police, find documents, go to the work place, get registered and everything”* (Nermin, female, 48, Crimean Tatar).

Against this background, interviews with Syrian nationals reveal a major contrast with non-Syrian migrants in Turkey due to a long list of challenges. Firstly, the difficulties of finding employment and the frequent incidents of not being paid salaries in the workplace are regarded as critical challenges in Turkey. Secondly, Syrian parents express their children’s schooling problems and that even in cases where their children are registered to local schools, arbitrary actions by school authorities hinder children from access to education. To illustrate, one parent recounted how her son is not allowed to participate in class even though he sits in the class (Lina, female, 28, Syria) and another parent shares that her daughter is instructed to sit in the school’s garden most of the school day (Büşra, female, 33, Syria). Thirdly, accommodation represents a major challenge for this group. All Syrian migrants mention the high rents for very low quality housing (underground, lacking windows, no toilets, no running water). Moreover, Syrian migrants often have to pay their landlord’s electricity bills as landlords’ believe Syrian migrants receive high financial state support. Fourthly, most Syrian migrants argued that another serious challenge is due to lacking translation services in hospitals, formal offices and elsewhere. Here, several migrants interpreted the lack of translation services as the proof of being unwanted.

Here, most Syrian nationals refuse the widespread image that they receive financial support from the Turkish state and explain the state officers’ mistreatment in detail. Among

the many experiences, “*being extra burden on officers’ backs*” was perceived as the main root of the mistreatment (*Heysem, male, 36, Syria*). One migrant recounts how she needs to apply to state authorities for her baby’s operation and is either ignored or sent away from state institutions ranging from municipalities to governorships and the DGMM (*Döne, female, 26, Syria*). Even though Turkey is still accepted as a good option for settlement due to the hope that the conditions here might change in the future, Syrian nationals consider their nationality an advantage in neither citizenship acquisition process nor integration.

In conclusion, the actors in the triadic structure demonstrate mostly divergent opinions on the element of nationality. To summarize, while consulates of the top sending states to Turkey see no linkage between the factor of nationality and citizenship acquisition, integration or dual citizenship, Turkey solidifies the significance of “Turkishness” through the full toleration of maintenance of the original citizenship. In the viewpoint of migrants however, because Turkish nationality does not facilitate citizenship acquisition, “Turkishness” represents no value in the relationship with the Turkish state.

### *Religion*

With regards to the question of how the aspect of religion functions in the context of dual citizenship and whether dual citizenship works as a barrier against or a facilitator of integration in terms of the aspect of religion, this section demonstrates converging viewpoints through the perspectives and experiences of the actors in the triadic structure.

To begin with, none of the top sending country officials in the context of Turkey perceive religion to have any linkage with the citizenship acquisition process, dual citizenship or integration. Likewise, none of the host country officials make a remark on the element of migrants’ religion and furthermore, strictly refuse that a migrant’s religion of Sunni Islam could have any impact on the migrant’s relationship with the Turkish state. Here, most of the officials underline that neither citizenship application forms nor the official citizenship files used specifically by the Citizenship Committee include the word “religion”. Moreover, not only in terms of citizenship acquisition, but also in terms of integration, the factor of religion is considered to be ineffectual.

Migrant statements on the influence of religion with regards to both citizenship and integration in Turkey reveal a similarity with the states’ perceptions of religion. Migrants, including those who are non-Muslim, do not consider the aspect of religious identity as being effectual. Furthermore, none of the migrants, Muslim and non-Muslim, who applied for

citizenship and experienced the citizenship process recall being asked about religion at any stage or as a subject matter in the Citizenship Committee. Here, for two reasons, the only migrants who consider the element of religion to have some weight in their residence in Turkey are those with Syrian nationality. Firstly, Syrian nationals hold the opinion that the reason Turkey allowed Syrian migrants through its borders is due to the common religion. Secondly, religion emerges as a positive element in relation to migrants' participation in the social life in Turkey. However, despite these opinions, Syrian nationals do not agree that the Turkish state treats them in accordance to the common courtesy of shared faith. Hence, even in the case of Syrian nationals who value religious identity as a reason for permanent settlement in Turkey, religion is considered to play no role on migrants' relationship with the Turkish state.

Against this background, opinions of all actors in the triadic structure mostly converge on the function of religion. In comparison to the subject matters of ethnicity and nationality which lead to crucial opinion divergences, religious identity stands out with the harmony of opinions among the actors of international migration in the context of Turkey. Despite the fact that this finding is not in line with the dominant literature that considers religion as a significant element in citizenship acquisition, religious identity appears as ineffectual with regards to the question of how the aspect of religion functions in the context of dual citizenship and whether dual citizenship works as a barrier against or a facilitator of integration.

### *Gender*

This research reveals two important findings in relation to the gender aspect of the citizenship dimension of identity and how it operates with regards to dual citizenship in the context of Turkey.

In the triadic structure, to begin with, consulate officials from top sending states to Turkey see no connection of gender identity to neither citizenship acquisition and dual citizenship nor integration. Similarly, interviews with Turkish state officials reveal that gender does not hold a position in these areas. Nevertheless, despite the fact that host country officials do not see any weight of gender in integration, several findings disclose that the citizenship acquisition process is gendered in the Turkish context.

In terms of the host state perspectives, Citizenship Committee questions on an applicant's activities in relation to housework and family relations signal the state

perspectives of gender where the wife is dependent on a husband rather than being an individual. Secondly, the finding that acting in accordance with Turkish traditions, as illustrated by Turkish officials, is considered to be not having practiced prostitution during the course of marriage also demonstrates a certain understanding of gender identity. Here, the authenticity of a marriage is checked by the Foreigners' Police through visits to a migrant's place of residence, inquiries at the migrant's neighborhood and "*the way the migrant and the Turkish citizen look at and treat each other during the Committee interview*" (*Interview with the Citizenship Commission members from Foreigners' Police*). In a similar fashion, again revealing the state perspectives of gender and ideal family, the presence of children is mostly regarded as a sign of an authentic marriage. Moreover, interestingly, a member of the Citizenship Committee pointed out "*women from Russia and Ukraine make good wives who adapt well to the Turkish culture*" (*Interview with the Citizenship Commission members from the Directorate of National Education*). While this does not necessarily imply a facilitation of the citizenship acquisition process for Russian and Ukrainian women, this finding is still interesting because it is the only remark made by the host country officials specifically on nationality and gender.

Next to the host state perspectives, migrants do not perceive gender to carry any weight in their relationship with the Turkish state or in terms of integration. In this research, only one female migrant highlights a disadvantage in relation to gender.

*"Even though I am Turkish and everyone knows we are Muslim, I suffered a lot in Turkey because I am a woman. Even in the university, the professor would ask me whether I drink wine because I come from a Christian country. In the workplaces I applied, I had some feelings that I was seen as an easy woman because I am a migrant. I would never have guessed this because I am a Muslim and a Turk. I am not, for example, a Russian woman. I had to turn down some job offers because of this fear. I believe Turkey is a very conservative country when it comes to issues such as alcohol, but very pervert-like when it comes to women. I never felt really secure because I am a female migrant because I know people look at me with a different eye, as if I am a whore. I am sure this does not exist in Europe. I have heard this from other women like me as well, unworthy feelings, being discriminated as a Bulgarian Turk and being judged because of being a migrant woman"* (Ayten, female, 31, Turk from Bulgaria).

While no other women in this study mention such experiences, this Bulgarian-Turkish woman's negative experiences points at the possibility that other migrant women may also face such unfavorable conditions but choose to remain silent during the in-depth interview due to uneasy nature of the subject. Hence, even though the lack of further findings on the disadvantages of the female gender does not allow a wider conclusion to be drawn on this

subject, this finding still reveals the possibility that women may have extra difficulties in relation to integration in social life in Turkey.

Overall, while none of the actors in the triadic structure of international migration see a connection of gender identity to citizenship acquisition, dual citizenship or integration, findings in this study reveal that the citizenship acquisition in Turkey functions as a gendered process even though the maintenance of original citizenship may not be linked to gender.

### **6.3 Concluding remarks**

On the whole, to shed light on the question whether dual citizenship acts as a barrier or catalyst of integration, this chapter assesses how dual citizenship functions in the citizenship dimensions of activity and identity in the context of Turkey.

To begin with the activity dimension of dual citizenship, a categorization of economic, social and political participation reveals the unevenness among the different modes of participation. Besides an astonishing level of asymmetry among the diverse modes of participation in the positions of sending states, host state and migrants, a heterogeneity is easily noticed among the different fractions of the same actor.

Several asymmetries need to be highlighted in the overview of the activity dimension of citizenship. Interestingly, the host state of Turkey has the tendency to view migrants' activity as a notion prior to citizenship, such as criteria to fulfill in the direction towards citizenship acquisition. Migrants' economic and social participation should be "completed preceding citizenship" as economically self-sufficient individuals acting in line with the Turkish culture. Sending states and migrants, however, consider activity in terms of economic participation as a notion that is achieved only subsequent to citizenship acquisition. Hence, the first asymmetry surfaces with regards to the perception of citizenship as the prize or tool for integration.

The second asymmetry concerning the activity dimension of citizenship emerges in relation to the disproportionate weights of different forms of participation where economic participation overshadows social and political participation. Here, the weight the Turkish state attaches to migrants' economic participation and self-sufficiency brings to mind Daniş and Parla's (2009) perspective on the state's market logic behind the decrease of the significance of Turkish ethnicity and nationality. While the general tendency of all actors of international migration is to hold integration as the synonym for economic participation,

migrants still consider social participation to be crucial. Furthermore, the fact that political participation remains almost as a non-issue for the great majority of migrants demonstrates the unevenness between the different modes of migrants' activity.

The final asymmetry of citizenship as activity comes into view with regards to the dual citizenship institution. Even though both sending states and migrants accept that Turkish citizenship is obligatory for integration- a concept dominated by economic participation, it is only the host state of Turkey that links dual citizenship with integration as a catalyst and as an element that enhances full participation in the economic life of Turkey. Hence, the core question of this chapter, how dual citizenship operates in the scope of economic integration, is only valid from the host state perspective and as a catalyst.

Following the different forms of participation, the second focal area to examine is the citizenship dimension of identity. In the assessment of the linkage between dual citizenship and integration, the level of asymmetry among the weight of particular identities of ethnicity, nationality, religion and gender is evident.

Firstly, an asymmetry comes into light with the contrast between states' and migrants' ideas on Turkish ethnicity. For sending states that accept the presence of a Turkish minority, ethnicity is the key determinant for citizenship acquisition and integration. To continue with the host state perspective, although Turkish ethnicity does not appear to be effective in the acquisition process, dual citizenship emerges as a solid way to consolidate the traditional emphasis on "Turkishness" in citizenship processes. Here, the findings that ethnically Turkish migrants are predominantly interested in the acquisition of Turkish citizenship and do not usually consider dual citizenship as a valuable status dominates migrant opinions on the citizenship process. Hence, in spite of the existing advantage of Turkish ethnicity in the toleration of dual citizenship, ethnically Turkish migrants do not agree that their ethnicity has any value in their relationship with the Turkish state.

Secondly, while the viewpoints of all actors converge on the opinion that membership to a Turkish minority in the origin country makes Turkey the main country of citizenship; other migrants often consider their origin country as the primary country of citizenship. In parallel, with regards to migrants' feelings of belonging and loyalty to Turkey, the level of emotional attachment revealed by the members of ethnically Turkish minorities towards the host nation is highly intense in comparison to other migrants.

Thirdly, with regards to the impact of religious identity on citizenship acquisition, dissimilar to the literature on the traditional significance of Islam in citizenship process, this source of identity does not emerge as a determinant in migrants' relationship with the Turkish state.

Fourthly, dissimilar to the opinions of states, citizenship acquisition appears as a gendered process in Turkey. Especially in case of female migrants married to Turkish nationals, the Turkish state seems to consider migrants not as individuals, but as wives dependent on their husbands. In this thinking, women are questioned in the Citizenship Committee with regards to their housework and family relations where living in accordance with Turkish traditions is depicted as not practicing prostitution and the presence of children is a key in the family unity. Despite the gendered citizenship process, no impacts were observed in relation to the impact of gender on the dual citizenship process.

On the whole, two dominant aspects in the participation and identity dimensions of citizenship are economic participation and "Turkishness". While economic participation is the key to citizenship acquisition and dual citizenship is considered a catalyst of integration defined as successful economic participation, identity for ethnically Turkish migrants and Turkish nationals is a critical factor in the tolerance for dual citizenship maintenance. Still, while Turkey's dual citizenship policy clearly puts forward the principle of selective tolerance for Turkish ethnicity and nationality, the identity dimension is overshadowed by Turkey's emphasis on economic participation in the citizenship dimension of activity.

With regards to the core questions in the dual citizenship literature, dual citizenship neither acts as a barrier against nor a facilitator of integration in the citizenship dimensions of activity and identity. Instead, the key element that affects integration is citizenship acquisition in Turkey. Even though dual citizenship is not considered as a significant status in relation to most aspects of citizenship, integration is highly facilitated by Turkish citizenship without which full integration does not seem possible, neither in the form of economic, social or political participation nor as a source of belonging in terms of identity.

## CHAPTER 7

### Conclusion

In an age marked by a steady trend towards states' broader acceptance of dual citizenship and the rise in the number of dual citizens across the globe, the expansion of dual citizenship raises numerous questions. Signalling a change in the traditional notion of citizenship accepted as single membership confined within territorial boundaries, these questions concern migrants' rights and obligations, participation and identity. Dual citizenship studies, however, have often been limited by contextual and geographical borders and offered partial insights into this institution by excluding some of the relevant actors.

To explore how dual citizenship modifies traditional citizenship, this study has dissected dual citizenship into Kymlicka and Norman's (2000) citizenship dimensions of status, activity and identity and broadened the perspective through the inclusion of all actors of international migration which are sending states, receiving states and finally, migrants. As an alteration from the typical dual citizenship setting and framework in which the attention is solely on the migrant receiving countries of the West, the research employed the case of Turkey from the global south to shed new light on the institution of dual citizenship. Here, Turkey's immigration context under focus consists of, first, migrants from Bulgaria, Germany, Iran, Iraq, Azerbaijan, Georgia, Russia, Syria Turkmenistan, Ukraine and Uzbekistan, second, officials from these major sending states and finally, officials from the host state of Turkey.

To assess how dual citizenship operates in the dimensions of citizenship and affects traditional citizenship in Turkey's immigration context, this study primarily explored two lingering questions that have long been at the center stage of the scholarly attention on dual citizenship. These two questions are, first, whether dual citizenship paralyzes the formal status of citizenship and, second, whether dual citizenship acts as a barrier against or as a catalyst of integration in the host states. While the first question concentrates on the impacts of dual citizenship on the legal status of citizenship, the second question concerns the activity and identity dimensions of dual citizenship in relation to integration. In point of fact, these questions around which most dual citizenship debates revolve only partially reflect the complexities of this institution and reduce dual citizenship to a monolithic and linear status



that operates homogeneously across the globe and independent of context. Nevertheless, these focal points in the literature still serve as instruments to analyze the modes in which dual citizenship operates in various citizenship dimensions.

To conclude the search for how dual citizenship modifies traditional citizenship with respect to citizenship as formal status and citizenship as activity and identity in the Turkish immigration space, this chapter will first summarize the research findings reached after an extensive field research that consists of officials from the major sending states to Turkey, international migrants and lastly, officials from Turkey as the host state. Next, contributions to the empirical and theoretical literature will be identified. Finally, the last section of the chapter will outline possible venues for further research that might extend the findings of this study.

## **7.1 Summary of findings**

The analysis of dual citizenship in the Turkish immigration space requires an in-depth research on various issues in relation to the host state, sending states and international migrants in this setting. At the state level, the issues under attention include the examination of state perspectives towards migrants' acquisition of Turkish citizenship and maintenance of dual citizenship in a mode that involves the divergence between *de jure* and *de facto* dual citizenship regimes. At the individual level which includes both citizens and non-citizens, the most crucial component of this research is migrants' positionalities with regards to Turkish citizenship acquisition and dual citizenship in terms of perceptions, opinions and practices based on the benefits, disadvantages and the meaning of citizenship. Hence, the operation of dual citizenship in the status, activity and identity dimensions and its impacts on the traditional nation-state membership are explored in the Turkish immigration space through the interactions, conflicts, convergences and divergences of state and individual actors.

In the first dimension, citizenship as legal status constitutes of states' dual citizenship policies and their practices on the ground. Noting the possible divergences between official regulations and authorities' interpretation of the existing legal framework, first, sending states' dual citizenship laws were categorized based on a desktop research. Accordingly, based on their official citizenship legislation, countries that ban dual citizenship in the Turkish immigration space constitute the largest category with Iran, Turkmenistan, Uzbekistan, Azerbaijan and Ukraine. To continue, the category of sending countries that

partially allow dual citizenship is the second largest group with Germany, Georgia, Syria and Russia. Finally, Bulgaria and Iraq make up the smallest category as the sending countries that allow dual citizenship.

In contrast to the official dual citizenship regimes, empirical findings from in-depth interviews with consulate officials of the major sending countries to Turkey reveal that sending countries most often turn a blind eye towards the existence of dual citizens despite their citizenship legislations that do not permit the legal status of dual citizenship. Accordingly, only two countries among the major sending countries to Turkey, Russia and Turkmenistan consider dual citizenship as a legal problem and require the renunciation of the original citizenship upon the acquisition of foreign citizenship. Thus, even in the countries that officially ban dual citizenship, state authorities often allow and accept dual citizenship in the face of increasing migration within the Turkish context. In light of this finding on the divergence between sending states' *de jure* and *de facto* citizenship regimes in Turkey's immigration context, this research puts forward that dual citizenship is actually tolerated by the great majority of sending states. Hence, most immigrants would be expected to make their citizenship decisions solely based on their life choices rather than being constrained by origin states' citizenship practices.

To continue with the host state's citizenship regime and the divergences between *de jure* and *de facto* practices, primarily, Turkey's dual citizenship laws put forward that citizens of several unannounced countries may be asked to give up their original citizenship upon the acquisition of Turkish citizenship. Interviews with state officials, however, may signal a divergence at the state level. Accordingly, the state's reservation to not allow dual citizenship for some undisclosed nationalities is considered as the outcome of an outdated security perspective. Still, despite interviews with a number of key officials in the citizenship acquisition process, the efforts to uncover the countries with which Turkey does not allow citizenship were in vain. However, this research reveals Turkey's principles of dual citizenship tolerance. Accordingly, migrants with Turkish ethnicity and nationality including Iraqi Turkmen, Iranian Azeris and ethnically Turkish migrants from Bulgaria and migrants from the Turkic countries of Azerbaijan, Turkmenistan and Uzbekistan are not asked to give up their original citizenship upon their citizenship acquisition in Turkey.

In this regard, Turkey's dual citizenship policy involves the principle of selective tolerance. This state approach reveals that migrants with Turkish ethnicity and nationality are assumed to be natural parts of the citizenry while migrants without Turkish identity may be

required to relinquish their original citizenships to prove their loyalty and belonging to Turkey. Thus, this selective tolerance of dual citizenship based on ethnicity and nationality signals Turkey's consolidation of the significance of "Turkishness" through the institution of dual citizenship.

Here, a distinction should be made with regards to the acquisition process and the Turkish state's tolerance for immigrants' maintenance of their original citizenship. In line with Parla's (2011) findings, this research finds that "Turkishness" does not appear to be a distinctive facilitator of migrants' citizenship acquisition in Turkey. In this regard, with the new citizenship law (*Law No. 5901*) of 2009 that emerged with the intention to respond to current circumstances including the need to harmonize the law with the *European Convention on Nationality*, the privilege attached to Turkishness seems to have been mostly eliminated in the citizenship acquisition process.

While the citizenship acquisition process does not seem to visibly contain an element of identity in relation to ethnicity, the finding that the maintenance of original citizenship and hence, the tolerance for dual citizenship is invariably allowed for Turkish migrants discloses the solidification and perpetuation of the influence of "Turkishness" through this institution. Hence, Turkey has reformulated ethnic privilege through its assurance of tolerance of dual citizenship. In other words, "Turkishness" has not been eliminated as a critical source of identity for inclusion but instead, relocated. At another level, the ethnicification of dual citizenship may reveal the state's intention to intensify political power beyond borders through Turkish ethnicity while the right reserved to asking migrants with no Turkish ethnicity to relinquish their original citizenships may disclose Turkey's security concerns in relation to dual citizens.

To continue with citizenship as legal status, at the individual level, empirical findings from interviews with migrants disclose that migrants' knowledge or assumption of dual citizenship laws often comply with neither the existing legal infrastructure nor states' dual citizenship practices on the ground. In this regard, migrants' diverse decision-making modes in relation to dual citizenship bring into light the categories of indifferent, uninformed and informed decision-makers among migrants from Bulgaria, Germany, Iran, Iraq, Azerbaijan, Georgia, Russia, Syria Turkmenistan, Ukraine and Uzbekistan in Turkey. On the whole, the critical determinant of the approach towards dual citizenship laws appears to depend on a migrant's main citizenship interest. In other words, whether a migrant is more focused on

keeping home country citizenship or acquiring host country citizenship determines a migrant's approach in relation to the legal dual citizenship framework.

In the first migrant category, indifferent decision-makers are migrants unconcerned whether their origin country allows dual citizenship due to a more dominant interest on Turkish citizenship. In addition to inattention to home country laws on dual citizenship, indifferent decision-makers are mostly unaware of Turkey's dual citizenship laws because, with their permanent settlements in Turkey, giving up their original citizenship due to Turkey's regulations does not constitute a point of concern.

In the second category, uninformed decision-makers predominantly concentrate on the maintenance of their original citizenship. Even though some migrants might also be interested in the acquisition of Turkish citizenship, the primary aim is to return to the home country at some further point in their lives rather than settling permanently in Turkey. This interest, however, does not mean migrants have factual information about dual citizenship laws. Uninformed decision-makers among migrants often lack solid information on their origin country's dual citizenship laws and as they are mostly disconnected from their origin states' both legal and practical regulations of dual citizenship, often make their citizenship decisions based on hearsay.

Finally, informed decision-makers, the smallest portion of migrants involved in this study, make their citizenship decisions based on factual information concerning the existing legal infrastructure in both home and host countries. While the main citizenship interest of informed decision-makers is not homogeneous despite permanent settlement in Turkey in many of the cases, migrants in this category have lingering connections with their home country. Hence, the common characteristic of informed decision-makers is frequent travel between home and host countries rather than a disconnection with the home country.

Hence, while the migrant approach to dual citizenship as a legal status is determined by the main interest of citizenship, this research finds that migrants often do not approach dual citizenship as an intrinsic value. Instead, the original citizenship is many times taken for granted and perceived as something already "in the basket" while the acquisition of residence country citizenship carries significance because it facilitates migrants' integration. In this thinking, holding dual citizenship does not attract much interest because this legal status is perceived to be neither particularly advantageous nor valuable.

Next, the duty aspect in linkage to citizenship as formal status consists of elements such as obedience to law, tax payment and military service and based on research results, may be identified as a source of divergence among actors of international migration. On the one hand, interviews with sending states' consulate officials reveal that the migrant sending states in the Turkish immigration space have mostly released migrants from their citizenship duties. On the other hand, Turkey as the host country has strict expectations from migrants in terms of obedience to law and taxation as criteria for citizenship acquisition. In point of fact, migrants' "respect towards laws", very frequently mentioned in the interviews with Turkish state officials, is a broad notion that also includes regular tax payment. Military obligations, however, do not seem to be among Turkey's expectations from migrants. At the individual level, in line with the sending state approach, migrants often disregard their duties towards origin states including the instances where they consider the maintenance of their original citizenship to be critical. Likewise, in terms of the duties towards Turkey, migrants act in line with the host country perspective on citizenship duties and consider taxation and obedience to law as important while they neglect military duties. Hence, migrant approaches to citizenship duties are mostly in parallel with the state expectations in the cases of both sending and host states.

Following citizenship duties, the rights in the formal dimension of citizenship consist of political participation and diplomatic protection. On the one hand, sending state approaches towards migrants' political participation can be considered as a spectrum with opinions ranging from intolerance to full encouragement. On the other hand, Turkey, as the host country, equals political participation to the duty of obeying the law and underlines the duty aspect of voting rather than a right. As the final actor, migrants display a diverse stance towards political participation where practices and opinions vary greatly ranging from having completely abandoned the interest towards political participation to being politically active in both countries of membership. Here, the great majority of migrants are uninterested towards politics in both countries. However, membership of a Turkish minority in the origin country illustrated in cases such as Turkmens from Iraq, ethnically Turkish migrants from Bulgaria and Azeris from Iran, often increases migrants' interest towards political participation in both countries. Hence, the critical determinant of migrants' interest in political participation is migrants' Turkish minority membership.

In spite of this divergence of opinions with regards to political participation, the right of diplomatic protection leads to mostly a convergence among actors. In point of fact, none

of the actors of international migration consider the complications linked with dual citizens' diplomatic protection as a crucial matter. Instead, diplomatic protection appears mostly as a non-issue.

From a broader lens, several asymmetries and disproportions mark the actors' consideration of citizenship duties and rights that constitute citizenship as formal status. On the one side, neglecting the cases of dual citizenship despite their citizenship regimes, having mostly released migrants from citizenship duties and only supporting their right to participate in elections in some cases, sending states are almost completely detached from their emigrants. Turkey, on the other side, asymmetrically puts forward a duty-centered understanding in its relationship with immigrants where even the right of political participation is transformed into a duty. Still, as the state's disregard of military obligations reveals, migrants are not expected to perform all citizenship duties. Finally, migrants are detached from any citizenship rights and duties in relation to their origin country in line with the sending state approach. However, their disconnection from sending states is to the degree of unawareness or misinformation even when the maintenance of original citizenship is considered crucial. Parallel to Turkey's expectations, migrants consider citizenship duties towards Turkey to be significant, especially when they plan long-term settlement in this host country. In contrast, it should be noted that the majority of migrants are disinterested in exercising their right of political participation in both home and host countries. Hence, states' emphasis on political participation does not resonate among migrants even in the case of dual citizenship.

In light of the research findings on the citizenship dimension of status, primarily, the impact of dual citizenship on formal citizenship is evidently a major shift in various aspects of formal citizenship in the Turkish context. While sending states almost completely eliminate their weight in terms of citizenship duties and rights, the host state also approaches these with a disproportionate emphasis. Migrants' response is not completely in harmony with this shift in states' expectations, as the right of political participation both towards origin and sending states, to exemplify, is also generally disregarded. As a result, in response to the question whether dual citizenship paralyzes citizenship as status, dual citizenship leads to not a complete, but a partial paralysis of formal citizenship in the context of dual citizenship in Turkey.

Moreover, based on this research on the Turkish migration context, dual citizenship appears to be encapsulated in a hazy territory where the rules of the game are not entirely

clear and precise. On the one side, with regards to the bureaucrats involved in migrants' citizenship processes, this study points at a vagueness or unpredictability for both sending state and receiving state officials. Neither those who grant citizenship to immigrants nor those who allow their emigrants to receive a second citizenship appear to follow open rules and guidelines. This obscurity also appears to be valid for the migrants themselves. Migrants, both applicants of a second citizenship and those who already are dual citizens, do not seem to make conscious decisions concerning dual citizenship. Instead, while a citizenship application in the host country is often a decision involving calculations about its specific benefits in Turkey, dual citizenship appears to come along spontaneously with a migrant's citizenship acquisition, without ever being a target itself. While none of the actors in the triadic structure can be perceived monolithically, this fuzziness seems to characterize the general framework of dual citizenship in the Turkish context.

Following the impacts of dual citizenship on traditional citizenship in the formal dimension, the second citizenship dimension under focus is the activity dimension that consists of economic, social and political participation in relation to integration in Turkey. To begin with, interviews with sending and host state officials and migrants demonstrate that economic participation overshadows the other forms of participation. While the host state of Turkey considers self-sufficiency as the most significant criteria for citizenship acquisition because it proves a migrant's successful integration, sending state officials and migrants share the view that efficient economic participation signifies migrants' integration. Accordingly, all actors of international migration perceive economic participation to be the most critical aspect of integration. Signalling a divergence of opinions between state officials and migrants, however, migrants often value access to social participation more than states. In contrast, states appear to attach more value to political participation in comparison to migrants among which many are uninterested in political participation in both origin and host countries.

To continue with the citizenship dimension of activity, an interesting finding concerns the relationship between activity and citizenship acquisition. Here, the host state perspective diverges from sending state and migrant perspectives especially with regards to where activity stands in the integration process. Accordingly, Turkey has the tendency to view activity as a notion prior to citizenship where, to be rewarded with Turkish citizenship, migrants' economic and social participation should be completed as economically self-sufficient individuals acting in line with the Turkish culture. Sending states and migrants,

however, perceive economic participation as achievable only consequent to citizenship acquisition. Still, migrants' and their origin states' standpoints are not completely parallel. While sending state officials consider social participation to be achievable prior to citizenship especially for ethnically Turkish migrants who are minority members in their origin countries, migrants, regardless of their ethnicity consider social participation to be attainable in the aftermath of citizenship acquisition. Despite these divergences on economic and social participation, opinions on political participation often converge. In this respect, the political aspect of migrants' activity is often linked with citizenship acquisition due to the right of electoral participation. In other words, all actors of international migration consider political participation as a consequence of citizenship acquisition.

To finalize the findings on the activity dimension, this research reveals only a weak linkage between dual citizenship and participation. To illustrate, despite that sending states and migrants attach significant importance to citizenship acquisition with regards to integration, migrants' maintenance of dual citizenship is not perceived to have any impact, neither positive nor negative, on their integration in Turkey. Instead, Turkey is the only actor in the triadic structure that links a form of participation, namely economic participation, in linkage with dual citizenship and integration. In point of fact, Turkey considers dual citizenship to catalyze integration after citizenship acquisition because it increases migrants' motivation for employment in the host country.

Returning to the debates lingering in the dual citizenship literature, the question whether dual citizenship functions as a barrier against or catalyst of integration in terms of the activity dimension can be partially valid and only for the host state of Turkey. Turkey, as the host state, is the only actor that links dual citizenship with integration as a catalyst with the belief that it enhances full participation in the economic life of Turkey. However, it should be noted that Turkey also strongly perceives economic activity as a critical requirement for citizenship. Concurrently, neither sending states nor migrants consider dual citizenship to be linked with integration in any way. Hence, from the perspective of sending states and migrants, even though Turkish citizenship acquisition is critical for integration, dual citizenship neither affects economic and social nor political integration. In consequence, dual citizenship operates as a catalyst of integration solely in the host state's viewpoint and only partially.

In response to the question whether dual citizenship acts as a barrier against or catalyst of integration in the Turkish context, the second focal area to examine is the



citizenship dimension of identity, which includes the particular identities of ethnicity, nationality, religion and gender. Research findings on state and migrant viewpoints not only display a high level of asymmetry among different actors, but also often a heterogeneity of opinions within states and migrants.

To begin with the findings on the ethnicity aspect of identity dimension, the presence and acceptance of a Turkish minority emerges as a significant determinant for the sending state perspective. Here, Bulgaria and Iraq, as the only two sending countries that accept the presence of Turkish minorities in this research, consider ethnicity as the main reason of their nationals' migration, citizenship acquisition and the greatest facilitator of integration for migrants in the host country. In contrast, for the host state of Turkey, Turkishness does not appear as a significant element in the citizenship acquisition process. Hence, Turkish ethnicity may not be considered a privilege that facilitates the citizenship acquisition process for migrants. As Turkey may require some applicants to relinquish their original citizenship and not allow them to maintain their original citizenship, however, the advantage of Turkish ethnicity appears with the state tolerance towards migrants' maintenance of dual citizenship. In this regard, the research finding that Turkey invariably allows ethnically Turkish migrants to maintain their original citizenship and hence, to hold dual citizenship demonstrates that ethnicity persists as a significant factor in the citizenship processes.

To continue with the findings on ethnic identity at the individual level, ethnically Turkish minority members from Bulgaria, Iraq and Iran who emphasize their loyalty and belonging to Turkey, feel frustrated concerning the citizenship process in Turkey. This frustration is rooted in the migrants' expectation that the Turkish state should facilitate Turkish migrants' citizenship acquisition based on their ethnicity in return for the value migrants attach to Turkish citizenship. Witnessing that ethnical identity does not affect the citizenship process, ethnically Turkish migrants generally hold the opinion that the Turkish state is indifferent to migrants' feelings of loyalty and belonging. As dual citizenship is not particularly valued as an advantaged status for most migrants, the state tolerance for dual citizenship remains unnoticed by ethnically Turkish migrants.

An interesting finding in relation to ethnic identity is how this element determines the primary country of citizenship for both sending states, migrants and possibly, for the host state of Turkey. To illustrate, Bulgarian and Iraqi officials consider the primary country of their ethnically Turkish migrants as Turkey. In contrast, where the Turkish minority is not recognized, such as in Ukraine and Iran, or where no Turkish minorities exist, officials

consider their migrants' primary country of residence to be the origin country despite migrants' dual citizenship. This sending state perspective is mostly paralleled by the migrant viewpoint. Accordingly, migrants with no Turkish minority membership in the origin country perceive their main country of citizenship as their origin country despite their dual citizenship. Other migrants often have the tendency to refer to their origin country as the primary country of citizenship in spite of their dual citizenship with Turkey and permanent settlement in the host country. In parallel, this line of thinking is also possibly valid for the host state. The finding that Turkey hesitates to tolerate dual citizenship for non-Turkish migrants reveals the attitude that non-Turkish migrants may not be highly attached to Turkish citizenship unless they relinquish their original citizenship.

In the second aspect of identity, research findings on nationality reveal convergence among sending states and migrants and to a certain degree, for the host state of Turkey. To illustrate, none of the sending states, including Turkic ones, consider nationality to play a role in migrants' citizenship acquisition or integration. Similar to the sending state viewpoint in this research, most migrants, including the ones with Turkish nationality, neither consider Turkey as their primary country nor emphasize feelings of belonging and loyalty like ethnically Turkish minority members. Instead, citizenship acquisition and permanent settlement in Turkey are often explained in relation to practical purposes such as employment or marriage. In parallel, Turkey does not consider nationality as a significant factor in the acquisition process. Here, it should be underlined that the host state approaches to Turkish nationality and minority membership based on ethnicity appear to be both under the notion of "Turkishness". Hence, similar to research findings on ethnicity, Turkish nationality functions as a privilege in the maintenance of original citizenship and hence, dual citizenship, consolidating the significance of Turkishness at one step further than citizenship acquisition.

Religious identity, as research findings reveal, does not emerge as a significant element of integration or citizenship acquisition in neither state nor migrant perspectives. Instead, opinions converge on the ineffectiveness of religious identity in migrants' relationship with the Turkish state. Host state officials' emphasis on the lack of the notion of religion in any part of the citizenship acquisition process is also present in migrant interviews. Migrants, including the few non-Muslim, do not recall filling in any information on their faith and being asked about religion at any point of their application process including their interview with the Citizenship Committee. More importantly, none of the

non-Muslim migrants involved in this study have sensed a feeling of discrimination due to their religion at any point of their citizenship acquisition process. Interestingly, this finding may be described as contrary to the traditional weight attached to religion in the evolution of citizenship acquisition in the Turkish context in which Sunni Islam has mostly functioned as a privilege.

Gender identity, the final aspect of citizenship dimension of identity in this research, discloses interesting findings. To begin with, sending state officials mostly have the opinion that neither citizenship acquisition and tolerance of dual citizenship nor integration are linked with gender. However, interviews with host state officials reveal that citizenship acquisition in Turkey may be a gendered process. To demonstrate, in cases of marriage with a Turkish national, Citizenship Committee interviews consist of questions on female applicants' housework routine and family relations which signal Sirman's (2005) notion of familial citizenship where the ideal woman citizen is a wife dependent on a sovereign husband rather than an individual. Moreover, host state officials make a lot of emphasis on how prostitution during marriage is against the principle of conformity with Turkish culture and traditions. Finally, women from certain nationals are considered to *"make good wives who adapt well to the Turkish culture"* (Interview with the Citizenship Commission members from the Directorate of National Education). Even though the state's approach to the institution of dual citizenship may not be linked to gender, the citizenship acquisition in Turkey emerges as a gendered process.

Thus, considering the research findings on ethnic, national, religious and gender identities in Turkey's immigration context, the most visible elements of identity in relation to dual citizenship emerge as ethnicity and nationality. Here, research findings on participation demonstrate that economic, social and political integration require citizenship and migrants' dominant interest lies in the acquisition of Turkish citizenship rather than the maintenance of both citizenships. Due to Turkey's reformulation of ethnic privilege through its relocation from the acquisition process to the toleration of dual citizenship, however, the privilege of Turkishness remains unnoticed by migrants who most often do not consider dual citizenship as of value. In this thinking, migrants interpret Turkey's approach to Turkishness, to *"not go beyond a tick in the language box of the application form they fill in the Turkish citizenship interview"* (Soltan, female, 42, Azerbaijan). Especially in the case of ethnically Turkish migrants who are minority members in their origin countries, the lack of ethnic privilege in

the citizenship acquisition process results in disappointment and frustration with the Turkish state.

At this point, it is necessary to point at two identity-related shortcomings in the research. In this research, a major shortcoming is the inadequacy of gender related issues and gender representation despite the dominant weight of female participants in the field study. The lack of findings on gender, however, does not necessarily mean that gender plays no role in citizenship processes. Here, one case, a female Turkish migrant Bulgaria gives clues about the disadvantages of being a migrant woman in Turkey (*Ayten, female, 31, Turk from Bulgaria*). She explains in detail that coming from Europe raises suspicions over a woman's Muslim faith. Accordingly, men often have the impression that a female migrant from Bulgaria will have open relationships with men and this image makes a woman's daily life difficult. No other female participants involved in this research gave accounts on the impacts of gender. This silence raises the possibility that women take the impacts of gender as given; assume them to be normal and expected.

Another identity-related shortcoming in this research has to do with the dominant weight of participants from Muslim countries. As a result of the migration trends in Turkey, non-Muslim participants are insufficiently represented in the study. To continue, as will be explained in detail, the migrant view in this research is that a migrant's religious identity plays no role in citizenship or dual citizenship processes. However, this finding appears to be in contrast with the Turkish citizenship literature and may be inaccurate for two reasons. First, the few non-Muslim migrant cases involved in this research are non-representative. Second, these migrants may assume it normal that being Muslim has its advantages in Turkey. In other words, the finding that religion plays no role in Turkish citizenship processes may not necessarily mean this is valid.

To return to the research findings, in light of the findings on the citizenship dimension of identity, the question whether dual citizenship acts as a barrier against or a facilitator of integration in the citizenship dimension of identity can be described as invalid. While no findings suggest that citizenship acquisition may function as a barrier against integration, the catalyst of integration in a host country appears as a migrant's act of acquiring host country citizenship. The maintenance of original citizenship and hence holding dual citizenship or, in other words, not relinquishing the original citizenship upon receiving host country citizenship does not seem to affect a migrant's integration.

Overall, findings on the impacts of dual citizenship on traditional citizenship in the citizenship dimensions of status, activity and identity in the Turkish immigration space reveal the complexity of the dual citizenship institution. Here, the lingering questions of the dual citizenship literature- whether dual citizenship paralyzes formal citizenship and operates as a barrier against or catalyst of integration, fall short of shedding light on the multiplicity and heterogeneity of this institution. Despite that these questions present dual citizenship as a monolithic and linear institution largely divorced from context, content and condition, they still represent a useful framework for the assessment of dual citizenship impacts on traditional citizenship.

In summary, concerning the debates on the impacts of dual citizenship on citizenship as formal status, this research reveals a partial paralysis of the legal status of citizenship in cases of dual membership. In this partial paralysis that marks the status of dual citizenship in the Turkish immigration space, citizenship transforms through a shift in rights and obligations and not all rights and duties of citizenship operate fully in migrants' dual membership. In response to the debates concerning the impact of dual citizenship on integration in a host country in terms of identity and activity, migrants' integration appears to be mostly catalyzed by citizenship acquisition. In this setting, dual citizenship seems to neither positively nor negatively affect any form of participation. In point of fact, as the only actor that links dual citizenship to a type of participation, the Turkish state views dual citizenship as a status that enhances migrants' economic participation even though successful activity is still a critical requirement for citizenship acquisition. Finally, in terms of identity, while membership to a Turkish minority in the origin country increases the feelings of belonging and loyalty to the host state, Turkey's reformulation of ethnic privilege and emphasis on economic participation prior to citizenship acquisition leads to a tension among migrants and leaves migrants in a state of unrequited expectation.

Here, a few words are necessary with regards to the timing of the study. The current climate of the scene shaped by the mass migration of Syrian nationals in Turkey has naturally had an impact on the citizenship processes. The president's announcement is the most visible sign of this impact. This call for citizenship was repeated several times in an atmosphere of religious sentiment mostly with an emphasis on the notion of "common values", the need to "embrace" the highly skilled migrants who should work regularly as the

“children of this nation”<sup>46</sup>. Here, the emphasis on the element of religion, more specifically on Allah and prayers is striking. This focus on religion and common values may signify a concurrent decrease on the impact of Turkish ethnicity in citizenship acquisition. In fact, prior to the mass migration of Syrian nationals, research on identity had demonstrated that Turkish ethnicity may no longer be a privilege in Turkey (e.g. Daniş and Parla 2009).

In addition to the matter of religion, the permanent settlement of more than three million foreign nationals in Turkey may have increased the Turkish state officials’ attention on the criteria of migrants’ economical self-sufficiency in the citizenship application process. However, reaching a general conclusion to claim that the Turkish state places increasing importance on religious identity and self-sufficiency with a decreasing attention on Turkish ethnicity as the direct result of Syrian migration requires a temporal study which this research cannot confirm due to its timing. Still, the axis of religiosity and ethnicity and the weight of the criteria of self-sufficiency certainly deserve attention.

## 7.2 Contributions to the literature

Dual citizenship studies are often limited by contextual and geographical boundaries and solely concentrated on the position of the receiving state. Hence, the primary theoretical contribution of this study is the relocation of the scholarly attention on dual citizenship to a case beyond Western Europe and North America in a way that includes all the relevant actors of the dual citizenship institution. Liberated from the fears and hopes attached to dual citizenship in the Western context, this study approaches the institution of dual citizenship from a new angle with the aim to enhance the comprehension of what exactly dual citizenship does to traditional citizenship.

At the sending state level in Turkey’s immigration context, the first key contribution of this research to the dual citizenship literature is the inclusion of the distinction between the de jure and de facto regulations of dual citizenship in the Turkish context, a matter that

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<sup>46</sup> <http://www.dw.com/tr/erdo%C4%9Fandan-suriyeliler-i%C3%A7in-vatanda%C5%9Fl%C4%B1k-a%C3%A7%C4%B1klamas%C4%B1/a-37043731>

[http://www.cumhuriyet.com.tr/haber/turkiye/561675/Erdogan\\_Suriyeli\\_kardeslerimize\\_vatandaslik\\_vercegiz.html](http://www.cumhuriyet.com.tr/haber/turkiye/561675/Erdogan_Suriyeli_kardeslerimize_vatandaslik_vercegiz.html)

has so far remained unstudied in specific relation this research setting. Accordingly, based solely on their official citizenship legislation, the great majority of sending countries legally ban dual citizenship in the Turkish immigration space. However, empirical findings from in-depth interviews with consulate officials reveal that sending countries most often turn a blind eye to their dual citizens and accept their emigrants' dual citizenship with Turkey. Hence, this research contributes to the literature by disclosing the sending state practices on the ground and consequently, reveals a dual citizenship scene dissimilar to the official regulations in Turkey's immigration space.

At the host state level, several contributions are made to the literature on Turkey's citizenship processes. Primarily, to bring into light a matter that remains partially in dark, the research maps the process of foreign migrants' citizenship acquisition in Turkey starting from the officials who initially receive migrants' citizenship applications and ending with the final decision-makers in the process. To summarize in a few words, the process includes several stages. Following a migrant's citizenship application to *the Department of Citizenship Acquisition Operations*, if the citizenship application criteria are fulfilled, the migrant has an interview with the Citizenship Committee. In the aftermath of the interview, the *Citizenship Commission Services* sends the migrant's citizenship file to the *Population and Citizenship Affairs* in Ankara for a final review. During this final review, the *Population and Citizenship Affairs* forwards the file to the *National Intelligence Organization* for a further security investigation. Consequent to the security check, the file is re-sent to the *General Directorate of Population and Citizenship Affairs* that gives consent to the positive decision of the Citizenship Committee. Hence, contributing to the Turkish citizenship literature, this study maps and thus unveils the operation of each stage of the citizenship acquisition process in which security appears to be prioritized.

To continue with the host state level, employing Kymlicka and Norman's (2000) framework to dissect citizenship into its dimensions of status, activity and identity, this research contributes to the existing literature by shedding light on Turkey's approach to immigrants' dual citizenship and explores the disproportion or asymmetry between these citizenship dimensions.

Accordingly, to begin with citizenship as status, while taxation and obedience to law are much emphasized by officials, migrants' military obligations are disregarded by the host state officials. Moreover, citizenship rights are often outweighed by the duties. In the second dimension, in terms of activity, economic participation overshadows migrants' social and

political participation. In the third dimension that includes identity based on religion, gender, ethnicity and nationality, immigrants' Muslim identity that traditionally facilitated citizenship acquisition according to Turkish citizenship literature, appears to no longer hold such a significant position. Next, this research highlights an aspect of citizenship that has not been much researched, namely the impact of gender in the acquisition process. In this regard, the host state's perception of female migrants as dependents rather than individuals and the emphasis on family as a value and the principle of conformity with Turkish culture and traditions reveal that citizenship acquisition may be a gendered process. Finally, despite the recent literature that signals the elimination of "Turkishness" as a significant identity in the citizenship process, this research reveals Turkey's reformulation of ethnic and national privilege by relocating the advantage of Turkishness in the tolerance towards migrants' maintenance of dual citizenship. Hence, the final contribution to the literature concerns Turkey's dual citizenship policy.

At the individual level of analysis, this research contributes to the existing literature in two subject matters insufficiently studied in the Turkish context, which are first, migrants' experiences of settlement in Turkey and second, migrant opinions and practices of dual citizenship.

With regards to the first subject, this study demonstrates that even though labor and education are among the most primary reasons behind settlement in Turkey, the legal entry status does not always coincide with the mode of settlement. In point of fact, tourist and student visas are often employed as a route to permanent settlement and employment in Turkey. At this point, residence permits are considered as easy to receive through a simple bureaucratic process depending on a migrant's economic situation. The acquisition of a work permit, however, is perceived as beyond the bounds of possibility. Furthermore, with respect to the acquisition of Turkish citizenship, except those with Turkish minority membership, most migrants are of the opinion that Turkish citizenship is a requirement to live in Turkey permanently for practical reasons. Overall, even though the majority of migrants involved in this research regard Turkish citizenship as a generally better citizenship than their original, Turkish citizenship is still perceived as of average value in the world in comparison to Western citizenships. Interestingly, citizenship through acquisition is sometimes considered less prestigious compared to citizenship by birth signalling that dual citizens may possibly not feel completely equal with others at their host country even after citizenship acquisition.



The final contribution of this research at the individual level concerns migrants' perspective of dual citizenship. Despite the existing literature that considers dual citizenship as a generally advantaged legal status that allows a migrant benefits from two countries, the most critical point raised by the majority of migrants is that an individual's dual citizenship, by itself, is not an asset and may only be of value in relation to the specific countries of citizenship. A "good citizenship" is determined by the chances of international mobility a passport provides, the economic and security situation in a country, provision of newcomer services by the state, the international prestige attached to a passport, the presence of ethnic ties with that country and finally, the practical advantages offered by a specific citizenship<sup>47</sup>. Hence, despite the common views towards dual citizenship as an advantaged status with increased rights, the great majority of migrants involved in this research do not attach any extra benefit to this status of dual citizenship. In direct linkage with this stance, the host state's tolerance of dual citizenship based on Turkishness goes unnoticed by migrants who often take their original citizenship as granted.

Finally, in response to the lingering questions of the dual citizenship literature, whether dual citizenship paralyzes formal citizenship and hinders or facilitates integration, the contribution from the Turkish context is the inadequacy of these questions in uncovering the multiplicity of the dual citizenship institution in different settings. Based on the perceptions and practices of sending and host states and migrants, these questions do not correspond well with the complexity of the operation of dual citizenship in different dimensions. This thinking paves the way for a third and more substantial contribution to the literature on dual citizenship: *sesqui citizenship*. Before the illustration of *sesqui citizenship* in the Turkish immigration context, however, the point of departure should be introduced.

Considering that migration has enormous implications on the concept and practice of citizenship, the unprecedented expansion of the number and geographical distribution of dual citizens in the last few decades requires a further differentiation in the notion of dual citizenship. In the guidance of Işın and Turner (2007) who find that the conception of citizenship is broadening in a constant evolution, I draw the conclusion that the concept of dual citizenship itself may also become differentiated to accommodate new positions and identities in the increasingly complex relationships between migrants and states. In point of

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<sup>47</sup> See also Balta and Olcay 2006, 2006(a) for other research on the value of citizenships in the context of foreign citizenship acquisition.

fact, the context of immigration already consists of various sorts of legal positions on the denizenship continuum (Walker 2008). When compared to Hammar's (1990) denizenship, which describes the legal status of long-term residents who enjoy most rights of citizenship except electoral rights, the status of dual citizenship appears to be located at the far end of the spectrum as the high point of plural recognition (Walker 2008). Without further differentiation of dual citizenship, however, dual citizenship appears as a uniform legal status.

Despite this seeming homogeneity of dual citizenship, this status is already admitted to rarely entail two symmetric memberships (Harpaz 2015). Even though a dual citizen has full rights and duties in both countries of citizenship, migrants are often rooted more firmly in one country in which all the rights and duties are operative (Harpaz 2015; Faist 2000). The other citizenship, for which immigrants do not usually have to take any special action to retain, is usually inactive as if in a state of pause with no actual interactions between the migrant and state and as Harpaz describes it, is a long-distance citizenship (Harpaz 2015). While the disproportionate weight in the dual citizenship is thus acknowledged, this research takes this imbalance between the two countries of citizenship as the starting point and both broadens and deepens the analysis of this asymmetry by incorporating all actors of the institution of dual citizenship and dissecting citizenship into its dimensions of status, participation and identity.

Hence, in light of the research findings on Turkey's immigration space which demonstrate that dual membership may not signify functioning citizenships in both polities, I would like to introduce a new concept of *sesqui citizenship* to highlight the asymmetrical, unbalanced weight of citizenship dimensions through the perspectives of migrants, sending states and host states. *Sesqui citizenship*, per contra to the notion of dual citizenship, stands for "one and a half citizenship" to imply the "less than wholeness" of this status. *Sesqui citizenship* is multi-layered and multi-dimensional. Not only it reveals the actors' unsymmetrical attention and practices of various citizenship dimensions and the different aspects of these dimensions, but also describes an asymmetry between the three actors' positions concerning dual citizenship. Considering citizenship as a relation between the state and the individual, *sesqui citizenship* is a mode of quasi-dual citizenship where, despite the acquisition of a second citizenship and the maintenance of original citizenship, these two citizenships do not function fully in the dimensions of status, activity and identity. *Sesqui citizenship* highlights the incomplete, partial operation of dual citizenship. Hence, as findings

from in-depth interviews with both sending and host state officials and migrants suggest, dual citizenship in Turkey's immigration context may function as *sesqui citizenship*. To illustrate how *sesqui citizenship* functions in Turkey's immigration space, it is necessary to focus on the assessment of citizenship dimensions through the perspectives of sending states, host states and migrants.

For the sending states, to begin with citizenship as formal status, states are often oblivious to the presence of dual citizens. Despite that most sending states in the Turkish context legally hinder dual citizenship, authorities consciously disregard the widespread practice of dual citizenship among their nationals in Turkey. In the aspect of duties, not only the obligations of taxation and military service are suspended, but migrants' disobedience to dual citizenship laws is also overlooked. This neglect is also often valid in the aspect of rights, which consists of political participation and diplomatic protection. To continue, the activity dimension of citizenship in the viewpoint of sending states may also be described in a state of pause. In this sense, considering citizenship as a relationship between the state and the individual, a major component in this relationship, which is rights and duties, is almost completely eliminated between sending states and their emigrants and activity, as economic, social and political participation mostly are absent.

Migrant identity, however, may change the sending state perspective and hence, the nature of this citizenship linkage. In point of fact, the findings of this research demonstrate that migrant identity determines whether a sending state considers an emigrant as still part of the citizenry and that Turkish minority membership appears to weaken that link between the sending state and the migrant. Henceforth, the sending state perspective that migrant identity determines the primary country of citizenship and that migrants (with no Turkish minority membership) acquire Turkish citizenship only due to pragmatic matters may reveal that sending states are even more disengaged from their ethnically Turkish migrants.

Still, for the sending states in the Turkish immigration context, even in the cases where emigrants are still considered to be a part of the citizenry based on their identity, the suspension of formal citizenship and the imbalanced weight among the various aspects of the activity dimension which mostly depict a pause to participation signal a presumed citizenship relationship stripped off of its major components and consequently, lead to *sesqui citizenship* for dual citizens.

To continue with the host state, Turkey's attitude in the formal dimension of citizenship is also marked by an unevenness similar to sending states. In the case of Turkey as the host state in this research, first, the heavy stress on taxation and obedience to law in contrast to the disregard towards military obligations and second, the transformation of the right of political participation into a mere duty demonstrate the imbalance between not only rights and duties, but also among various citizenship duties as well. Similarly uneven is the state approach towards different forms of participation where economic participation outweighs social and political participation. Hence, in the host state approach, both formal citizenship and citizenship as activity function disproportionately.

The citizenship dimension of identity, however, similar to the sending state perspective, shapes the linkage between the immigrant and the host state. Here, Turkey's dual citizenship policy illustrates the significant impact of identity in the citizenship processes. The entailment of an identity-based selective tolerance that possibly hinders dual citizenship for non-Turkish migrants reveals the Turkish state's perception of belonging. In this regard, the tolerance of dual citizenship for Turkish migrants may indicate that Turkish migrants are considered as loyal to Turkey even if they have another citizenship while non-Turkish migrants may not be highly attached to Turkish citizenship unless they relinquish their original citizenship.

On the whole, Turkey's imbalanced weight on various citizenship dimensions which forms a disproportion not only between duties and rights but also among duties and different forms of participation lead to *sesqui citizenship* for dual citizens regardless of identity, including the migrants with Turkish identity.

Finally, at the migrant level, this research reveals that status and activity dimensions of citizenship operate fully neither with regards to host nor home country citizenship. Accordingly, most migrants have ended their formal relationship including both duties and rights with their origin country even in cases where they still deem the origin country as the primary country of citizenship. In the relationship with the host state, citizenship duties overshadow rights and economic participation outweighs political and social participation in Turkey. Hence, the imbalance between citizenship dimensions that is visible in the state approaches persists in the migrant approach forming the conditions for *sesqui citizenship* not only because the citizen's relationship with the origin country is suspended, but also because the citizen's relationship with the residence country does not fully operate.

As for the last dimension, similar to the case of states, the element of identity has a significant impact in shaping the citizenship experience of migrants. Here, the departure point is in line with the existing literature. Accordingly, migrants' citizenship perspectives can be distinguished between those with an instrumental understanding, who perceive citizenship acquisition as a matter of convenience and those with feelings of belonging to the residence country (Schlenker et al. 2016). In the context of this research, the feelings of belonging to the residence country are strictly rooted in Turkish ethnicity or more specifically, Turkish minority membership in the origin country. To explain, migrants with membership of ethnically Turkish minorities in their origin countries often have a very high degree of belonging to Turkey but no such sentimental links with the origin country. Along these lines, the great majority of migrants with no Turkish minority membership still consider their homeland to be their origin country in spite of their acquisition of Turkish citizenship and permanent plans of settlement in Turkey. The significant impact of ethnicity on belonging is the last attribute of *sesqui citizenship* in the Turkish case.

While *sesqui citizenship* signifies dual citizenship that is “less than two citizenships” or a mode of quasi- dual citizenship with an incomplete, partial operation of dimensions of status, activity and identity in a triadic framework of sending states, host states and international migrants, a central component in the Turkish context concerns the element of belonging. This research reveals that the presence (or absence) of an ethnic connection or minority membership to the receiving state- Turkishness in this research context, arises as a major element that connects the state and the migrant regardless of whether other citizenship dimensions function.

Consequently, where migrants are of Turkish ethnicity, both sending states and migrants themselves consider the main country for migrants as Turkey. Where migrants have no Turkish minority membership in the origin country, however, the main country is still perceived to be the origin country both by sending states and migrants themselves in spite of host country citizenship and permanent settlement. Likewise, the host country's dual citizenship policy that involves tolerance based on identity reveals the similar approach to Turkishness. In the host state approach, migrants with Turkish identity are perceived as a more natural part of the citizenry in contrast to non-Turkish migrants who may be required to relinquish their original citizenship for the acquisition of Turkish citizenship to prove their loyalty and belonging to Turkey. Within this frame, even though the dimensions of status and activity function asymmetrically and disproportionately in all dual citizenship cases

regardless of identity, the impact of identity on the nature of dual citizenship is immense. Identity, as the presence or absence of ethnic ties to the residence country determines which citizenship linkage *in sesqui citizenship* has more weight.

To conclude, *sesqui citizenship* presents a further differentiation of the citizenship conception in a setting different from the typical dual citizenship research context. In general, the institution of dual citizenship implies a dual nature with a linear increase in citizenship rights and expanded political and economic opportunities and signifies a highly advantaged status in comparison to mono-citizenship. *Sesqui citizenship* reveals otherwise. To begin with citizenship as formal membership, despite a shift in the rights and duties, the reconfiguration is not linear because rights and duties do not uniformly increase with dual citizenship. Instead, both rights and duties function only partially in both citizenships. Likewise, the activity dimension as political, economic and social participation operates fully in neither of the citizenships. In the Turkish case, identity in terms of ethnicity, however, is a critical component that establishes the citizenship link through belonging, determines the homeland and hence, which citizenship between the two citizenships in *sesqui citizenship* has more weight both for the states and the migrant. Overall, through the perspectives of sending and host states and migrants, *sesqui citizenship* brings forward a conceptual differentiation to recognize the different ways of membership embedded in the status of dual citizenship.

To avoid the production of a monolithic notion that universalizes dual citizenship as *sesqui citizenship*, however, one needs to explore all the conditions that lead to the practice of dual citizenship in the form of “one and a half citizenship”. *Sesqui citizenship* at this level is yet only in the form of a preliminary draft calling for a detailed unpacking in diverse contexts including the Turkish context.

Here, *sesqui citizenship* should be unpacked with a detailed analysis on how citizenship is practiced and how it has evolved in every one of the sending states to shed light on how dual citizenship functions in different contexts. Here, the most noticeable weakness of the research can be considered as the merge of different sending states into a singular actor as “the sending state”. However, the data gathered through interviews with the consulates of migrant sending states is not extensive enough to unambiguously distinguish between different categories of sending states with respect to the nature of citizenship in those countries. In other words, the present study is not extensive enough to fit sending states into

general categorizations of dual citizenship and draw conclusions based on the evolution of citizenship in each country.

Nevertheless, sending states are not entirely perceived as a singular actor. Despite the lack of a general typology that reveals the reasons behind, research findings allow the identification of distinct categories on sending states' approaches towards themes such as sending state perspectives towards dual citizenship laws and several rights and duties of dual citizenship. Still, their stance cannot be connected to a certain citizenship characterization, as mentioned above, due to the lack of such refined data.

Returning to the conditions that lead to *sesqui* citizenship, one should also assess the approach of the second actor, which is the Turkish state in the triadic structure. Turkish state, overall, has a more inclusive approach towards migrants with Turkish ethnicity in terms of dual citizenship. This stance may be rooted in Turkey's ethno-centric understanding of citizenship, an ethnic concept of nationhood and consequently, its exclusivist policy towards non-Muslim and non-Turkish migrants. However, even for the migrants with Turkish ethnicity, the state still puts forward an asymmetrically duty-centered understanding of citizenship due to a centralist and statist framework involving a top-down rights approach. This statist approach may be the main reason that sets the stage for *sesqui citizenship* from the angle of the receiving state.

With the third actor, the immigrants, dual citizenship practices reveal a differentiation among migrants. Most often, migrants involved in this research are not interested in the status of dual citizenship. This disinterest in dual citizenship is most apparent in the case of migrants who settle in Turkey due to reasons of protection. More specifically, based on migrants' decision-making modes explored in this study, it is mostly the indifferent and uninformed decision-makers who practice dual citizenship in the form of *sesqui citizenship*. In the first category, the indifferent decision-makers concentrate solely on acquiring Turkish citizenship with no interest in the maintenance of the original citizenship. These migrants are not interested in their home country citizenship and are disconnected from their home countries. Likewise, the dual citizens among the uninformed decision-makers, whose priority is holding on to the home country citizenship, are also detached from their home country citizenship despite their interest in keeping it. Moreover, as explained in detail, the lack of ethnic ties to a host country decreases the interest in exercising voting rights. Hence, migrants' *sesqui citizenship* practices may be connected to their citizenship interests and dominant identity. Hence, even though *sesqui citizenship* presents a further differentiation of

the citizenship conception, it still requires to be well-developed to illuminate how dual citizenships function in diverse contexts and through the perspectives of various actors.

### 7.3 Venues for further research

Before addressing the venues for further research, it should be highlighted again that this study concentrated on a particular research setting in a specific time frame. Albeit the fact that all relevant actors were incorporated in the research for a comprehensive and balanced assessment, the dynamism of citizenship configurations should always be taken into account. In this case, the ever-increasing immigration flows to Turkey signal possible future changes in relation to the state perspective of the dual citizenship institution. Thus, firstly, the repetition of this study in the near future may disclose dissimilar findings and reveal the process of change in state perspectives under the pressure of increasing instances of dual citizenship.

Secondly, from a wider perspective along the lines of this research, the theoretical and practical debates on dual citizenship will benefit from comparative studies outside the usual research settings of dual citizenship. In this regard, further research data from other non-Western contexts will test the validity and generalizability of the findings in this research. Here, it should be also noted that both citizenship rights and duties vary from state to state (Işın and Turner 2002). Dual citizens may experience that their citizenship rights and duties are not of similar weight in their two countries of citizenship. With one country of citizenship, a dual citizen may feel that her rights are prioritized while with the other country of citizenship, she may notice that her citizenship duties weigh more than her rights. Hence, the assessment of migrant experiences concerning the different weights of rights and duties for each citizenship will facilitate shedding light on how dual citizenship functions in different contexts. To continue, in contexts where the nature of citizenship dimensions varies, dissimilar citizenship outcomes may disclose further differentiation of dual citizenship. Likewise, identity may not play such a critical role in determining which citizenship has more weight in *sesqui citizenship* in other contexts.

An identity related venue for further research concerns the need to study the gender elements in the citizenship processes in Turkey. As elaborated among the shortcomings of research, gender related issues and gender representation are inadequate in this research despite the dominant weight of female participants in the field study. This may indicate that



women take the impacts of gender as given, assume them to be normal and expected. Hence, this element may be scrutinized by research that directly concentrates on gender.

Along these lines, another venue for further research concerns the different dual citizenship practices of various migrant categories in Turkey. To illustrate, economic migrants and refugees may have different perspectives of citizenship and dual citizenship due to the dissimilarity in their reasons to migrate. Along these lines, with respect to the different groups of migrants, a specific focus on the case of migrants under international protection can be helpful to give direction to the citizenship debates in the Turkish context. At the bottom line, one should note that Turkey hosts more than three million Syrian nationals who are under international protection. While this study includes Syrian participants and finds out that most are interested in Turkish citizenship with the hope that it will ameliorate their daily problems, dual citizenship does not currently appear as a point of interest for these migrants. In the near future, however, a large population among the Syrian nationals may be granted Turkish citizenship. As this will lead to a massive community of dual citizens, the dual citizenship experiences of this migrant population and their dissimilarities with other migrant categories may help to uncover how dual citizenship is experienced in line with types of migration.

Next, for a more complete understanding of how dual citizenship functions, the case of emigrants from Turkey who received host country citizenship elsewhere may also be studied to illuminate other dual citizenship experiences and to assess the modes in which citizenship dimensions function also within a triadic structure that involves the receiving state, Turkey as the sending state and international migrants.

Finally, next to the necessity of broadening the geographical focus, it should be noted that the study of citizenship dimensions in the context of dual citizenship also requires a comparison with mono-citizens' and in parallel, states' perceptions and practices with regards to the status, activity and identity dimensions of citizenship for mono-citizens. In this regard, the sole emphasis on the dual citizens' position with respect to citizenship dimensions, despite that it reveals how dual citizenship functions in non-Western settings, discloses only a partial reality in terms of how citizenship is practiced in these geographies. Thus, for a complete understanding, the study of dual citizenship should also put mono-citizens under the spotlight.

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**Table 1. Sending states' dual citizenship laws**

<b>Official legislation</b>	<b>Strictly ban dual citizenship</b>	Azerbaijan Iran Turkmenistan Ukraine Uzbekistan	<b>State practices</b>	<b>Strictly ban dual citizenship</b>	Russia Turkmenistan
	<b>Partially allow dual citizenship</b>	Germany Georgia Russia Syria		<b>Tolerate dual citizenship</b>	Azerbaijan Iran Ukraine Uzbekistan
	<b>Tolerate dual citizenship</b>	Bulgaria Iraq			Germany Georgia Syria Bulgaria Iraq

**Table 2. State interviews**

<b>In-depth interviews with state officials</b>	
<b>Sending states' consulates</b>	
Germany	May 3, 2016, Istanbul
Georgia	May 10, 2016, Istanbul
Ukraine	May 11, 2016, Istanbul
Iraq	May 16, 2016, Istanbul
Bulgaria	May 17, 2016, Istanbul
Turkmenistan	August 31, 2016, Istanbul
Iran	September 1, 2016, Istanbul
Uzbekistan	September 2, 2016, Istanbul
Russia	September 5, 2016, Istanbul
<b>Host state officials</b>	
Head Officer of the Department of Citizenship Acquisition Operations	September 8, 2016, Istanbul
Head Officer of the Citizenship Commission Services	September 19, 2016, Istanbul
Head of Population and Citizenship Services	October 4, 2016, Istanbul
Directorate of National Education	October 6, 2016, Istanbul
Foreigners' Police	November 7, 2016, Istanbul
Head of the General Directorate of Population and Citizenship Office of Turkey	December 13, 2016, Ankara
Head of Beşiktaş Population and Citizenship Services	December 20, 2016, Istanbul

**Table 3. Migrant interviews**

<b>Interview number</b>	<b>Name</b>	<b>Gender</b>	<b>Age</b>	<b>Origin country</b>	<b>Migrant ethnicity</b>	<b>Entrance to Turkey</b>	<b>Legal status in Turkey</b>	<b>Willingness to acquire Turkish citizenship</b>
<b>1</b>	<b>Kabuter</b>	Female	50	<b>Azerbaijan</b>	Azeri	2010	Citizen, 2016, marriage	Citizen
<b>2</b>	<b>Soltan</b>	Male	42	<b>Azerbaijan</b>	Azeri	2010	Work permit	Yes, application process
<b>3</b>	<b>Arzu</b>	Female	34	<b>Azerbaijan</b>	Azeri	2010	Citizen, 2016, marriage	Citizen
<b>4</b>	<b>Aydan</b>	Female	25	<b>Azerbaijan</b>	Azeri	2010	Residence permit, marriage	Yes, application process
<b>5</b>	<b>Inare</b>	Female	51	<b>Azerbaijan</b>	Azeri	2011	Residence permit, marriage	Yes, application process
<b>6</b>	<b>Salifov</b>	Male	42	<b>Azerbaijan</b>	Azeri	2013	Residence permit	Yes
<b>7</b>	<b>Ayten</b>	Female	31	<b>Bulgaria</b>	Turkish	2004	Residence permit, marriage	Yes, application process
<b>8</b>	<b>Sabri</b>	Male	27	<b>Bulgaria</b>	Turkish	1996	Residence permit	Yes
<b>9</b>	<b>Reyhan</b>	Male	23	<b>Bulgaria</b>	Turkish	2008	Student visa	Yes, application process
<b>10</b>	<b>Ersin</b>	Male	28	<b>Bulgaria</b>	Turkish	2010	Student visa	Yes
<b>11</b>	<b>Asım</b>	Male	29	<b>Bulgaria</b>	Turkish	2008	Citizen, 2011 by residence	Citizen
<b>12</b>	<b>Ahmet</b>	Male	27	<b>Bulgaria</b>	Turkish	2007	Citizen, 2011 by residence	Citizen
<b>13</b>	<b>Hüseyin</b>	Male	27	<b>Bulgaria</b>	Turkish	2008	Citizen, 2011 by residence	Citizen
<b>14</b>	<b>Temo</b>	Male	29	<b>Georgia</b>	Georgian	2010	Tourist visa	No

<b>Interview number</b>	<b>Name</b>	<b>Gender</b>	<b>Age</b>	<b>Origin country</b>	<b>Migrant ethnicity</b>	<b>Entrance to Turkey</b>	<b>Legal status in Turkey</b>	<b>Willingness to acquire Turkish citizenship</b>
15	Lale	Female	31	Georgia	Georgian	2011	Tourist visa	No
16	Seyli	Female	64	Georgia	Georgian	2008	Tourist visa	No
17	Manana	Female	45	Georgia	Georgian	2008	Work permit	No
18	Lamzo	Female	40	Georgia	Georgian	2008	Work permit	No
19	Iris	Female	65	Germany	German	1996	Citizen, 2014, marriage	Citizen
20	Inge	Female	73	Germany	German	1961	Citizen, 1963, marriage	Citizen
21	Henrik	Male	38	Germany	German	2008	Residence permit, marriage	Unable due to laws
22	Jonas	Male	37	Germany	German	2010	Residence permit	Yes, application process
23	Şermin	Female	30	Iran	Farsi	2013	Residence permit, marriage	Yes, application process
24	Nigar	Female	32	Iran	Farsi	2010	Tourist visa	No
25	Celil	Male	41	Iran	Azeri	2010	Citizen, 2016 by residence	Citizen
26	Katrin	Female	38	Iran	Assyrian	2000	Citizen, 2009, marriage	Citizen
27	Mona	Female	30	Iran	Farsi	2014	Student visa	Yes
28	Sevinç	Female	33	Iran	Azeri	2014	Student visa	Yes
29	Mete	Male	25	Iran	Afghan	2009	Student visa	Yes

<b>Interview number</b>	<b>Name</b>	<b>Gender</b>	<b>Age</b>	<b>Origin country</b>	<b>Migrant ethnicity</b>	<b>Entrance to Turkey</b>	<b>Legal status in Turkey</b>	<b>Willingness to acquire Turkish citizenship</b>
<b>30</b>	<b>Menekşe</b>	Female	38	<b>Iran</b>	Farsi	2004	Citizen, 2010, marriage	Citizen
<b>31</b>	<b>Ramin</b>	Male	43	<b>Iran</b>	Azeri	2008	Residence permit, marriage	Yes, application process
<b>32</b>	<b>Gönül</b>	Female	29	<b>Iraq</b>	Turkmen	2004	Citizen, 2013 by residence	Citizen
<b>33</b>	<b>Kenan</b>	Male	30	<b>Iraq</b>	Turkmen	2000	Citizen, 2016 by residence	Citizen
<b>34</b>	<b>Şahin</b>	Male	28	<b>Iraq</b>	Turkmen	2008	Citizen, 2015 by residence	Citizen
<b>35</b>	<b>Sara</b>	Female	26	<b>Iraq</b>	Turkmen	1991	Citizen, 2013 by residence	Citizen
<b>36</b>	<b>Diyar</b>	Male	66	<b>Iraq</b>	Turkmen	2005	Citizen, 2015 by residence	Citizen
<b>37</b>	<b>Ömer</b>	Male	26	<b>Iraq</b>	Turkmen	2009	Residence permit	Yes
<b>38</b>	<b>Selda</b>	Female	23	<b>Iraq</b>	Turkmen	2005	Residence permit	Yes
<b>39</b>	<b>Aleika</b>	Female	47	<b>Russia</b>	Russian	2002	Citizen, 2009, marriage	
<b>40</b>	<b>Nadya</b>	Female	42	<b>Russia</b>	Russian	1996	Citizen, 2012, marriage	
<b>41</b>	<b>Natalie</b>	Female	36	<b>Russia</b>	Russian	2006	Residence permit	Yes
<b>42</b>	<b>Alex</b>	Male	37	<b>Russia</b>	Russian	1997	Residence permit	Unable due to laws
<b>43</b>	<b>Anfisah</b>	Female	30	<b>Russia</b>	Russian	2006	Citizen, 2011, marriage	
<b>44</b>	<b>Irina</b>	Female	51	<b>Russia</b>	Russian	2009	Residence permit	Yes, application process

<b>Interview number</b>	<b>Name</b>	<b>Gender</b>	<b>Age</b>	<b>Origin country</b>	<b>Migrant ethnicity</b>	<b>Entrance to Turkey</b>	<b>Legal status in Turkey</b>	<b>Willingness to acquire Turkish citizenship</b>
<b>45</b>	<b>Lidia</b>	Female	44	<b>Russia</b>	Russian	2005	Citizen, 2008, marriage	
<b>46</b>	<b>Süheyla</b>	Female	26	<b>Syria</b>	Turkmen	2013	Temporary identity	Yes
<b>47</b>	<b>Gisah</b>	Female	23	<b>Syria</b>	Turkmen	2013	Temporary identity	Yes
<b>48</b>	<b>Büşra</b>	Female	33	<b>Syria</b>	Arab	2015	Temporary identity	Yes
<b>49</b>	<b>Nuseybe</b>	Female	15	<b>Syria</b>	Arab	2015	Temporary identity	Yes
<b>50</b>	<b>Bedia</b>	Female	32	<b>Syria</b>	Arab	2015	Temporary identity	Yes
<b>51</b>	<b>Heysem</b>	Male	40	<b>Syria</b>	Arab	2013	Temporary identity	Yes
<b>52</b>	<b>Emine</b>	Female	30	<b>Syria</b>	Arab	2014	Temporary identity	Yes
<b>53</b>	<b>Döne</b>	Female	26	<b>Syria</b>	Arab	2012	Temporary identity	Yes
<b>54</b>	<b>Emine</b>	Female	37	<b>Syria</b>	Arab	2013	Temporary identity	Yes
<b>55</b>	<b>Muna</b>	Female	34	<b>Syria</b>	Arab	2015	Temporary identity	Yes
<b>56</b>	<b>Ranim</b>	Female	29	<b>Syria</b>	Arab	2015	Temporary identity	Yes
<b>57</b>	<b>Lina</b>	Female	28	<b>Syria</b>	Arab	2012	Temporary identity	Yes
<b>58</b>	<b>Aygün</b>	Female	45	<b>Turkmenistan</b>	Turkmen	2006	Citizen, 2013, marriage	
<b>59</b>	<b>Çemen</b>	Female	40	<b>Turkmenistan</b>	Turkmen	2002	Citizen, 2012, marriage	



<b>Interview number</b>	<b>Name</b>	<b>Gender</b>	<b>Age</b>	<b>Origin country</b>	<b>Migrant ethnicity</b>	<b>Entrance to Turkey</b>	<b>Legal status in Turkey</b>	<b>Willingness to acquire Turkish citizenship</b>
<b>60</b>	<b>Ece</b>	Female	38	<b>Turkmenistan</b>	Turkmen	2000	Citizen, 2002, marriage	
<b>61</b>	<b>Nurana</b>	Female	27	<b>Turkmenistan</b>	Turkmen	2011	Residence permit	Unable due to laws
<b>62</b>	<b>Gonca</b>	Female	43	<b>Turkmenistan</b>	Turkmen	2011	Residence permit	Unable due to laws
<b>63</b>	<b>Maksat</b>	Female	36	<b>Turkmenistan</b>	Turkmen	2006	Residence permit, marriage	Unable due to laws
<b>64</b>	<b>Gülşen</b>	Female	73	<b>Ukraine</b>	Crimean Tatar	2006	Residence permit	No
<b>65</b>	<b>Nermin</b>	Female	48	<b>Ukraine</b>	Crimean Tatar	2007	Residence permit	No
<b>66</b>	<b>Cevriye</b>	Female	60	<b>Ukraine</b>	Crimean Tatar	2004	Residence permit	No
<b>67</b>	<b>Zahreh</b>	Female	28	<b>Ukraine</b>	Crimean Tatar	2011	Residence permit	Yes
<b>68</b>	<b>Aybek</b>	Male	25	<b>Uzbekistan</b>	Uzbek	2012	Residence permit	Unable due to laws
<b>69</b>	<b>Dürdane</b>	Female	27	<b>Uzbekistan</b>	Uzbek	2013	Residence permit, marriage	Yes, application process
<b>70</b>	<b>Fuat</b>	Male	33	<b>Uzbekistan</b>	Uzbek	2010	Residence permit	Unable due to laws
<b>71</b>	<b>Murad</b>	Male	22	<b>Uzbekistan</b>	Uzbek	2013	Residence permit	Unable due to laws
<b>72</b>	<b>Gülbahar</b>	Female	47	<b>Uzbekistan</b>	Uzbek	2012	Residence permit	Unable due to laws

**Table 4. Gender and age distribution**

Country of origin	Gender		Total	Age	
	Female	Male		Range	Average
<b>Azerbaijan</b>	5	1	6	25-51	41
<b>Bulgaria</b>	1	6	7	23-31	27
<b>Georgia</b>	4	1	5	29-64	41
<b>Germany</b>	2	2	4	37-65	53
<b>Iran</b>	6	3	9	25-43	34
<b>Iraq</b>	3	4	7	23-66	32
<b>Russia</b>	6	1	7	30-51	41
<b>Syria</b>	11	1	12	15-37	29
<b>Turkmenistan</b>	6	0	6	27-45	38
<b>Ukraine</b>	4	0	4	28-73	52
<b>Uzbekistan</b>	2	3	5	22-47	31
<b>Total</b>	<b>50</b>	<b>22</b>	<b>72</b>	<b>15-73</b>	<b>38</b>

## References

- Abadan-Unat, Nermin, Volkan Çıdam, Dilek Çınar, Zeynep Kadirbeyoğlu, Selcan Kaynak, Bahar Özay, and Sercan Taş. 2014. "The Voting Behavior of Euro-Turks and Turkey's Presidential Elections of 2014." Friedrich-Ebert-Stiftung.
- Ablyatifov, Rustem. 2009. "Citizenship Reform and Challenges for the Crimean Tatars in Ukraine." In *Statelessness and the Benefits of Citizenship: A Comparative Study*, edited by Brad Blitz and Maureen Lynch. Oxford Brookes University, UK.
- Agnew, John. 1999. Mapping Political Power Beyond State Boundaries: Territory, Identity and Movement in World Politics. *Journal of International Studies* 28(3): 499-521.
- Akgündüz, Ahmet. 2008. *Labour Migration from Turkey to Western Europe- 1960-1974*. London, Ashgate.
- Aksel, Damla. 2014. "Kins, Distant Workers, Diasporas: Constructing Turkey's Transnational Members Abroad." *Turkish Studies* 15(2).
- Alarian, Hannah M., and Sara Wallace Goodman. 2016. "Dual Citizenship Allowance and Migration Flow, An Origin Story." *Comparative Political Studies* 50 (1):133-167.
- Aleinikoff, Thomas Alexander, and Douglas B. Klusmeyer. 2001. *Citizenship Today: Global Perspectives and Practices*. Washington, D.C.: Carnegie Endowment for International Peace.
- Altındağ, Onur and Neeraj Kaushal. 2007. "Do Refugees Impact Voting Behavior in the Host Country? Evidence from Syrian Refugee Inflows in Turkey" *IZA DP* No. 10849.
- Amuedo-Dorantes, Catalina and Susan Pozo. 2006. "Migration, Remittances and Male and Female Employment Patterns." *American Economic Review* 96 (2):222-226.
- Antonsich, Marco. 2010. "Searching for Belonging – An Analytical Framework." *Geography Compass* 4: 644–659.
- Artan, Zeynep. 2009. "From Village Turks to Euro-Turks: Turkish State's Perceptions of Turkish Migrants in Europe." MA Thesis, Boğaziçi University.

Aybay, Rona. 2008. *Citizenship Law*. Istanbul: Bilgi University Press.

Baklacioğlu Özgür, Nurcan. 2004. "Dual Citizenship, Extraterritorial Elections and National Policies: Turkish Dual Citizens in the Bulgarian Political Sphere." Paper presented at the International Conference on the Status Law Syndrome: Post-Communist Nation-Building or Post-Modern Citizenship? Budapest, Hungary, October 14-16.

Balta Evren, and Özlem Altan-Olcay. 2016. "Strategic citizens of America: Transnational Inequalities and Transformation of Citizenship." *Ethnic and Racial Studies* 39(6): 939-957.

Balta Evren, and Özlem Altan-Olcay. 2016a. "Class and passports: Transnational strategies of distinction in Turkey". *Journal of Sociology* 50(6):1106-1122.

Balkır, Canan, and Berna Kırkulak. 2007. "Turkey as a New Destination for Retirement Migration." The Institute of Social Sciences, The Netherlands.

Barabantseva, Elena, and Claire Sutherland. 2011. "Diaspora and Citizenship: Introduction." *Nationalism and Ethnic Politics* 17(1):1-13.

Bauböck, Rainer, Bernhard Perchinig, and Wiebke Sievers, eds. 2007. *Citizenship Policies in the New Europe*. Amsterdam University Press.

Bauböck, Rainer, Eva Ersbøll, Kees Groenendijk, and Harald Waldrauch, eds. 2006. *Acquisition and Loss of Nationality*. Amsterdam, Amsterdam University Press.

Bauböck, Rainer. 1994. "From Aliens to Citizens: Redefining The Status of Immigrants In Europe." *Public Policy and Social Welfare* (17).

Bauböck, Rainer. 1995. *Transnational Citizenship: Membership and Rights in International Migration*. Aldershot, Hants: Brookfield. Bauböck, Rainer. 2003. "Towards a Political Theory of Migrant Transnationalism." *The International Migration Review* 37(3).

Bauböck, Rainer. 2005. "Expansive Citizenship—Voting beyond Territory and Membership." *Political Science and Politics* 38 (4):683-687.

Bauböck, Rainer. 2006. "Introduction in Migration and Citizenship: Legal Status, Rights and Political Participation." <http://dare.uva.nl/cgi/arno/show.cgi?fid=45576>.

Bauböck, Rainer. 2006a. "Stakeholder Citizenship and Transnational Political Participation: a Normative Evaluation of External Voting." *Fordham Law Review* 75: 2393–2447.

Bauböck, Rainer. 2009. "The Rights and Duties of External Citizenship." *Citizenship Studies* 13(5):475-499.

Bauböck, Rainer. 2010. "Studying Citizenship Constellations." *Journal of Ethnic and Migration Studies* 36:5.

Betts, Katherine. 2002. "Democracy and dual citizenship." *People and Place* 10(1): 57–70.

Bevelander, Pieter, and Justus Veenman. 2006. "Naturalisation and Socioeconomic Integration: The Case of the Netherlands." *IZA Discussion Papers* (2153).

Bevelander, Pieter, and Mikael Spång. 2014. "From Aliens to Citizens: The Political Incorporation of Immigrants." Institute for the Study of Labor, Discussion Paper 7920.

Bilgili, Özge, and Melissa Siegel. 2011. "Understanding the Changing Role of the Turkish Diaspora." United Nations University, Maastricht Economic and Social Research and Training Centre on Innovation and Technology.

Blatter, Joachim, Stefanie Erdmann, and Katja Schwanke. 2009. "Acceptance of Dual Citizenship: Empirical Data and Political Contexts." *Working Paper Series, Glocal Governance and Democracy*, 02. Institute of Political Science, University of Lucerne.

Blatter, Joachim. 2008. "Dual Citizenship and Democracy. Glocal Governance and Democracy." Working Paper Series. Accessed September 21, 2015.

Blatter, Joachim. 2011. "Dual Citizenship and Theories of Democracy." *Citizenship Studies* 15(6-7): 769-798.

Bloemraad, Irene. 2004. "Who Claims Dual Citizenship? The Limits of Postnationalism, The Possibilities of Transnationalism and The Persistence of Traditional Citizenship."

*International Migration Review* 38 (2):389–426.

Blunt, Alison. 2007. "Cultural Geographies of Migration: Mobility, Transnationality and Diaspora." *Progress in Human Geography* 31(5):684–694.

Bosniak, Linda. 2002. "Multiple Nationality and The Postnational Transformation of Citizenship." *Virginia Journal of International Law* 979(42).

Bowden, Brett. 2003. "The Perils of Global Citizenship." *Citizenship Studies* 7:349–362.

Brand, Laurie. 2006. "Frontmatter." In *Citizens Abroad*, edited by Laurie Brand, i-viii. Cambridge: Cambridge University Press.

Brand, Laurie. 2006. *Citizens Abroad: Emigration and The State in The Middle East and North Africa*. Cambridge University Press.

Brown, Gregory. 2002. "Political Bigamy? Dual Citizenship in Australia's Migrant Communities." *People and Place* 10:71–78.

Brubaker, Rogers. 1992. *Citizenship and Nationhood in France and Germany*. Cambridge, MA: Harvard University Press.

Çağaptay, Soner. 2003. "Citizenship Policies in Interwar Turkey." *Nations and Nationalism* 9(4): 601-619.

Çağaptay, Soner. 2004. "Race, Assimilation and Kemalism: Turkish Nationalism and the Minorities in the 1930s." *Middle Eastern Studies* 40(3):86-101.

Çağlar, Ayşe. 2004. "Citizenship Light: Transnational Ties, Multiple Rules of Membership, and The Pink Card." In *Worlds on the Move. Globalization, Migration, and Cultural Security*, edited by Jonathan Friedmann and Shalini Randeria. London/New York: I. B. Tauris.

Cain, Bruce, and Brendan Doherty. 2006. "The Impact of Dual Nationality on Political Participation." In *Transforming Politics, Transforming America: The Political and Civic Incorporation of Immigrants in the United States*, edited by Taeku Lee, Karthick Ramakrishnan and Ricardo Ramirez, 89–105. Charlottesville, London: University

of Virginia Press.

Cano, Gustavo, and Alexandra Delano. 2007. "The Mexican Government and Organized Mexican Immigrants in the United States: A Historical Analysis of Political Transnationalism (1848–2005)." *Journal of Ethnic and Migration Studies* 33 (5): 695-725.

Carens, Joseph. 2000. *Culture, Citizenship and Community*. Oxford: Oxford University Press.

Castles, Stephen, and Alastair Davidson. 2000. *Citizenship and Migration: Globalization and The Politics of Belonging*. New York: Routledge.

Castles, Stephen, and Mark Miller. 2009. *The Age of Migration*. Palgrave Macmillan; 4th edition.

Chaudhary, Ali, R. 2016. "Voting Here and There: Interrogating Political Integration and Transnational Political Remittances." Presented in a Panel Convened by the Standing Committee on Integration and Transnationalism at the IMISCOE Annual Conference, Prague.

Constant, Amelie F., Liliya Gataullina and Klaus F. Zimmermann. 2007. "Naturalization Proclivities, Ethnicity and Integration." *DIW Discussion Papers* (755).

Conway, Dennis, Robert Potter, and Godfrey St. Bernard. 2008. "Dual Citizenship or Dual Identity?: Does Transnationalism Supplant Nationalism Among Returning Trinidadians?." *Global Networks* 8(4):373-397.

Cordero-Guzmán, Héctor, Robert C. Smith, and Ramón Grosfoguel. 2001. *Migration, Transnationalization and Race in a Changing New York*. Philadelphia: Temple University Press.

Council of Europe (COE). "Law of Azerbaijan on Citizenship of the Azerbaijan Republic." Accessed August 12, 2016.

[http://www.coe.int/t/dghl/standardsetting/nationality/National%20legislation/AZERBAIJAN%20Law%20Citizenship\\_ENG.pdf](http://www.coe.int/t/dghl/standardsetting/nationality/National%20legislation/AZERBAIJAN%20Law%20Citizenship_ENG.pdf) .

Council of Europe (COE). "Law of the Republic of Georgia on Citizenship of Georgia." Accessed August 20, 2016.

[http://www.coe.int/t/dghl/standardsetting/nationality/National%20legislation/Georgia%20Law%20on%20Citizenship\\_ENG.pdf](http://www.coe.int/t/dghl/standardsetting/nationality/National%20legislation/Georgia%20Law%20on%20Citizenship_ENG.pdf)

Dahlin, Eric, and Ann Hironaka. 2008. "Citizenship Beyond Borders: A Cross-National Study of Dual Citizenship." *Sociological Inquiry* 78(1): 54–73.

Danış, Didem, and Ayşe Parla. 2009. "Nafile Soydaşlık: Irak ve Bulgaristan Türkleri Örneğinde Göçmen, Dernek ve Devlet." *Toplum ve Bilim* 114:131-158.

Davis, Uri. 1996. "Citizenship Legislation in the Syrian Arab Republic." *Arab Studies Quarterly* 18:1.

de Haas, Hein. 2009. "Mobility and Human Development." *Human Development Research Paper* (01).

de Rooij, Eline. 2012. "Patterns of Immigrant Political Participation: Explaining Differences in Types of Political Participation between Immigrants and the Majority Population in Western Europe." *European Sociological Review* 28 (4): 455–481.

Dronkers, Jaap, and Maartens Vink. 2012. "Explaining Access to Citizenship in Europe: How Citizenship Policies Affect Naturalization Rates." *European Union Politics* 13:390-412.

Dumbrava, Costica. 2014. *Nationality, Citizenship and Ethno-Cultural Belonging, Preferential Membership Policies in Europe*. Houndmills Basingstoke: Palgrave Macmillan.

Eder, Mine. 2007. "Moldovalı Yeni Göçmenler üzerinden Türkiye'deki Neo-Liberal Devleti Yeniden Düşünmek." *Toplum ve Bilim* 108:129-42.

Ehrkamp, Patricia, and Helga Leitner. 2003. "Beyond National Citizenship: Turkish Immigrants and The (Re)Construction of Citizenship in Germany." *Urban Geography* 24(2): 127-146.

Ekşi, Nuray. 2001. *Dual Nationality and Military Service*. Istanbul.

Entzinger, Han. 2006. "Changing the rules while the game is on; From multiculturalism to assimilation in the Netherlands." In *Migration, Citizenship, Ethnos: Incorporation Regimes in Germany, Western Europe and North America*, edited by Bodemann, Michal Y., and Gökçe Yurdakul, 121-144. New York: Palgrave MacMillan.

Erder, Sema, and Selmin Kaşka. 2003. "Irregular Migration and Trafficking in Women: The



Case of Turkey.” International Organization for Migration.

Erder, Sema. 2000. “Uluslararası Göçte Yeni Eğilimler: Türkiye ‘Göç Alan’ Ülke mi?.” In *Mübeccel Kıray için Yazılar*, edited by Atacan, Fulya. Bağlam, Istanbul.

Erder, Sema. 2003. “Flows of Huddles: The Case of Turkey.” In *Migration and Labour in Europe Views from Turkey and Sweden*, edited by Emrehan Zeybekoğlu, Bo Johansson. Marmara University Research Centre for International Relations, Swedish National Institute for Working Life: Istanbul.

Ersanilli, Evelyn, and Ruud Koopmans. 2010. “Rewarding Integration? Citizenship Regulations and The Socio-Cultural İntegration of Immigrants in The Netherlands, France and Germany.” *Journal of Ethnic and Migration Studies* 36(5).

Eurostat. “Acquisition of citizenship.” Accessed May 15, 2015. <http://ec.europa.eu/eurostat/web/products-datasets/-/tps00024>.

Escobar, Christine. 2006. "Migration and Citizen Rights: The Mexican Case." *Citizenship Studies* 10(5): 503-522.

Escobar, Cristina. 2004. “Dual Nationality and Political Participation: Migrants in the Interplay of United States and Colombbian Politics.” *Latino Studies* 2:45-69.

Escobar, Cristina. 2007. “Extraterritorial Political Rights and Dual Citizenship in Latin America.” *Latin American Research Review* 42(3):43-75.

European Parliament. 2009. “Your Travel Abroad is Not Appropriate”: Propiska, ‘Exit Visas’ and Other Relics of the Soviet Era in Uzbekistan Today.” Accessed August 9, 2016. [http://www.europarl.europa.eu/meetdocs/2009\\_2014/documents/droi/dv/droi\\_20100602\\_6p\\_suz\\_/droi\\_20100602\\_6psuz\\_en.pdf](http://www.europarl.europa.eu/meetdocs/2009_2014/documents/droi/dv/droi_20100602_6p_suz_/droi_20100602_6psuz_en.pdf).

Faist, Thomas. 2000. "Transnationalization in International Migration: Implications for the Study of Citizenship and Culture." *Ethnic and Racial Studies* 23 (2): 189-222.

Faist, Thomas, and Jürgen Gerdes. 2008. “Dual Citizenship in an Age of Mobility.” Report for the Transatlantic Council of Migration. Brussels.

Faist, Thomas, and Peter Kivisto. 2007. *Dual Citizenship in Global Perspective: From*

*Unitary to Multiple Citizenship*. New York: Palgrave Macmillan.

Faist, Thomas, Jürgen Gerdes, and Beate Rieple. 2007. "We Are All "Republican" Now: The Politics of Dual Citizenship in Germany." In *Dual Citizenship in Europe*, edited by Thomas Faist, 45-76. Farnham, Surrey: Ashgate.

Faist, Thomas. 1998. "Transnational Social Spaces Out of International Migration: Evolution, Significance and Future Prospects." *Archives Européennes de Sociologie* 39(2): 213- 247.

Faist, Thomas. 2000. *The Volume and Dynamics of International Migration and Transnational Social Spaces*. Oxford: Oxford University Press.

Faist, Thomas. 2001. "Dual Citizenship as Overlapping Membership." Willy Brandt Series of Working Papers in International Migration and Ethnic Relations 3.

Faist, Thomas. 2006. "The Transnational Social Spaces of Migration." COMCAD Working Paper Series 10.

Faist, Thomas. 2007. "The Fixed and Porous Boundaries of Dual Citizenship." In *The Politics of Dual Citizenship in Europe: From Nationhood to Societal Integration*, edited by Thomas Faist, 1-44. Aldershot, UK: Avebury.

Faist, Thomas. 2007. *Dual Citizenship in Europe: From Nationhood to Societal Integration*. Aldershot, UK: Ashgate

Farrokhi, Mansour. 2015. "Non-Recognition of Dual Citizenship in Iranian Law: A Compendious Survey of Statutory Law." *American International Journal of Social Science* 4(2).

Fitzgerald, Jennifer, David Leblang, and Jessica Teets. 2014. "Defying The Law of Gravity: The Political Economy Of International Migration." *World Politics* 66:406-445.

Fitzgerald, David. 2006. "Rethinking Emigrant Citizenship." *New York University Law Review* 81 (1): 90–116.

Forcese, Craig. 2005. "Shelter from the Storm: Rethinking Diplomatic Protection of Dual

Nationals in Modern International Law.” *The George Washington International Law Review* 37(2): 469–500.

Gamlen, Alan. 2008. “The Emigration State and the Modern Geopolitical Imagination.” *Political Geography* 27.

Garcés-Mascareñas, Blanca. 2015. “Deservingness Frames on Citizenship: Residence, Performance and Vulnerability.” *INTEGRIM* Third Annual Conference, Istanbul.

Gelekçi, Cahit. 2011. “Avrupa’da Yaşayan Türklere Yönelik Çifte Vatandaşlık Uygulamaları: Belçika Örneği.” *Bilig* 59: 123-146.

Gelekçi, Cahit. 2014. “Avusturya’da Yaşayan Türklerin Türkiye ile Bağları ve Evlilik Göçü.” *Bilig* 71:179-204.

Gerdes, Jürgen, Thomas Faist, and Beate Rieple. 2007. “We Are All “Republican” Now: The Politics of Dual Citizenship in Germany.” In *Dual Citizenship in Europe*, edited by Thomas Faist, 45-76. Farnham, Surrey: Ashgate.

Gidley, Ben, and Maria Luisa Caputo. 2013. “Residential Integration – Towards A Sending Country Perspective”. *INTERACT*, Researching Third Country Nationals’ Integration as a Three-way Process - Immigrants, Countries of Emigration and Countries of Immigration as Actors of Integration Research Report Position Paper.

Gilbertson, Greta. 2006. “Citizenship In a Globalized World.” Migration Information Service. Washington: Migration Policy Institute.

Gsir, Sonia. 2014. “Civic Participation and Integration: A Country of Origin Perspective.” *INTERACT* Researching Third Country Nationals’ Integration as a Three-way Process - Immigrants, Countries of Emigration and Countries of Immigration as Actors of Integration Research Report.

Guarnizo, Luis Eduardo, and Michael Peter Smith. 1998. "The Locations of Transnationalism." *Transnationalism From Below* 6: 3-34. New Brunswick

Guarnizo, Luis Eduardo, Alejandro Portes, and William J. Haller. 2002. "Transnational Entrepreneurs: An Alternative Form of Immigrant Economic Adaptation." *American Sociological Review* 278-298.

Guarnizo, Luis Eduardo, Alejandro Portes, William Haller. 2003. "Assimilation and Transnationalism: Determinants of Transnational Political Action among Contemporary Migrants." *American Journal of Sociology* 108 (6): 1211–1248.

Guarnizo, Luis Eduardo. 2001. "On the Political Participation of Transnational Migrants: Old Practices and New Trends." In *E Pluribus Unum? Contemporary and Historical Perspectives on Immigrant Political Incorporation*, edited by Gary Gerstle and John Mollenkopf, 213-263. New York: Russell Sage.

Gugushvili, Alexi. 2012. "EUDO Citizenship Observatory Country Report: Georgia." Accessed August 12, 2016.

[http://apps.eui.eu/Personal/Researchers/AlexiGugushvili/EUDO\\_Georgia.pdf](http://apps.eui.eu/Personal/Researchers/AlexiGugushvili/EUDO_Georgia.pdf)

Guild, Elspeth, Kees Groenendijk, and Sergio Carrera, eds. 2009. *Illiberal Liberal States: Immigration, Citizenship and Integration in the EU*. Farnham, Surrey: Ashgate.

Gustafson, Per. 2002 "The Swedish Debate on Dual Citizenship." *Journal of Ethnic and Migration Studies* 28:463–481.

Gustafson, Per. 2005. "International Migration and National Belonging in the Swedish Debate on Dual Citizenship." *Acta Sociologica* 48(1): 5–19.

Guzmán, Juan Carlos, Andrew R. Morrison, and Mirja Sjöblom. 2008. "The Impact of Remittances and Gender on Household Expenditure Patterns." In *The International Migration of Women: Trade and Development*, edited by Schiff, Maurice, Andrew R. Morrison and Mirja Sjöblom. New York and Washington: World Bank and Palgrave Macmillan.

Güzel, Ali, and Fuat Bayram, eds. 2007. *Türk Hukukunda Yabancıların Çalışma Hakları ve Çalışma İzinleri, Türkiye’de Yabancı İşçiler*. Istanbul: Derin Yayınları.

Hacıoğlu, Büşra, Alina Shams, Amy Wood, and Ruiqian Zhang. 2014. "Dual Citizenship: Reducing Governance and Protection Gaps." Cigi Junior Fellows, Policy Brief 15.

Hailbronner, Kay, and Anuscheh Farahat. 2015. "EUDO Citizenship Observatory Country Report on Citizenship Law: Germany." Accessed August 15, 2016.

[http://cadmus.eui.eu/bitstream/handle/1814/34478/EUDO\\_CIT\\_2015\\_02-Germany.pdf?sequence=1](http://cadmus.eui.eu/bitstream/handle/1814/34478/EUDO_CIT_2015_02-Germany.pdf?sequence=1) .

Hailbronner, Kay. 2003. "Rights and Duties of Dual Nationals: Changing Concepts and Attitudes." In *Rights and Duties of Dual Nationals*, edited by David Martin and Key

Hailbronner, 3-18. The Hague: Kluwer Law International.

Hailbronner, Kay. 2006. Nationality In Public International Law and European Law. In *Acquisition and Loss of Nationality. Policies and Trends in 15 European Countries*, edited by Rainer Bauböck, Eva Ersbøll, Kees Groenendijk, and Harald Waldrauch. Amsterdam : Amsterdam University Press.

Hammar, Thomas. 1985. "Dual Citizenship and Political Integration." *International Migration Review* 19(3):438-450.

Hammar, Thomas. 1990. *Democracy and the Nation State: Aliens, Denizens and Citizens in a World of International Migration*. Aldershot: Avebury.

Hansen, Randall, and Patrick Weil. 2002. *Dual Nationality, Social Rights, and Federal Citizenship in the U.S. and Europe: The Reinvention of Citizenship*. New York, NY: Berghahn Books.

Harpaz, Yossi. 2015. "Ancestry into Opportunity: How Global Inequality Drives Demand for Long-distance European Union Citizenship." *Journal of Ethnic and Migration Studies*, 41:13.

Howard, Marc Morjé. 2005. "Variation in Dual Citizenship Policies in the Countries of the EU." *International Migration Review* 39: 697–720.

İçduygu, Ahmet, and Deniz Sert. 2010. "Consequences of Transnational Citizenship for Migrant Sending Countries: A Debate on Dual Citizenship." In *Transnationalisation and Institutional Transformations*, edited by Thomas Faist, Pirrko Pitkänen, Jürgen Gerdes and Eveline Reiseanuer. COMCAD Working Paper 87.

İçduygu, Ahmet, and Banu Şenay. 2008. "Making Citizenship and Instrument for Empowering Migrants in Council of Europe." In *Reconciling Migrants' Well-Being*, 297-311. Strasbourg: Council of Europe Publishing.

İçduygu, Ahmet, and Damla Aksel. 2013. "Turkish Migration Policies: A Critical Historical Retrospective." *Perceptions* 18(3):167-190.

İçduygu, Ahmet, and Damla Aksel. 2015. "Migration Realities and State Responses: Rethinking International Migration Policies in Turkey." In *Social Transformation and Migration: National and Local Experiences in South Korea, Turkey, Mexico and Australia*, edited by Stephen Castles, Derya Ozkul and Magdalena Cubas. Palgrave Macmillan.

İçduygu, Ahmet, and Deniz Sert. 2009. "Country Profile Turkey." *Focus Migration*.

İçduygu, Ahmet, and Fuat Keyman. 2003. "Globalization, Civil Society and Citizenship in Turkey." *Citizenship Studies* 7:2.

İçduygu, Ahmet, and Kemal Kirişci. 2009. *Land of Diverse Migration Challenges of Immigration and Emigration in Turkey*. Istanbul: Istanbul Bilgi University Press.

İçduygu, Ahmet, and Kristen Biehl. 2009. "Turkey. Country Reports: Turkey, Italy, Spain." *Managing International Urban Migration*.

İçduygu, Ahmet, Yılmaz Çolak, and Nalan Soyarık. 1999. "What is the Matter with Citizenship? A Turkish Debate." *Middle Eastern Studies* 35(4):187-208.

İçduygu, Ahmet. 2005. "International Migration and Citizenship Debate in Turkey- The Individual Level of Analysis in Citizenship in a Global World." In *European Questions and Turkish Experiences*, edited by Fuat Keyman and Ahmet İçduygu, 196-216. Routledge.

İçduygu, Ahmet and Doğu Şimşek. 2016. "Syrian Refugees In Turkey: Towards Integration Policies". *Turkish Policy Quarterly* 15: (3).

İçduygu, Ahmet. 2006. "Türkiye-Avrupa Birliği İlişkileri Bağlamında Uluslararası Göç Tartışmaları." *Sosyal İşler Komisyonu TÜSİAD*.

İçduygu, Ahmet. 2008. "Circular Migration and Turkey: An Overview of the Past and Present: Some Demo-Economic Implications." *CARIM Analytic and Synthetic Notes*, 10.

İçduygu, Ahmet. 2014. "Turkey's Migration Transition and its Implications for the Euro-Turkish Transnational Space." *Global Turkey in Europe, Working Paper 7*. [http://www.iai.it/pdf/GTE/GTE\\_WP\\_07.pdf](http://www.iai.it/pdf/GTE/GTE_WP_07.pdf) .

Institute for War and Peace Reporting (IWPR). 2009. "Uncertain Times for Turkmenistan's Dual Passport Holders." Accessed 10 August 2016.

<https://iwpr.net/global-voices/uncertain-times-turkmenistans-dual-passport-holders>

Işın, Engin F., and Bryan Turner. 2002. "Citizenship Studies: An Introduction." In *Handbook of Citizenship Studies*, edited by Engin Işın and Bryan Turner, 1–10. London: Sage.

Işın, Engin, and Bryan Turner. 2007. "Investigating Citizenship: An Agenda for Citizenship Studies." *Citizenship Studies* 11 (1):5–17.

Itzigsohn, José, and Silvia Giorguli Saucedo. 2002. "Immigrant Incorporation and Sociocultural Transnationalism." *International Migration Review* 36 (3): 766–798.

Jacobson, David. 2001. "The Global Political Culture." In *Identities, Borders, Orders: Rethinking International Relations Theory*, edited by Mathias Albert, David Jacobson and Yosef Lapid, 161–180. Minneapolis, MN: University of Minnesota Press.

Jacobson, Mari-Liis, and Leif Kalev. 2013. "Transnational Citizenship as Status, Identity and Participation: Comparative Assessment." In *Democracy in Transition: Political Participation in the European Union*, edited by Kyriakos Demetriou, 201–223.

Jones-Correa, Michael. 2001. "Under Two Flags: Dual Nationality in Latin America and Its Consequences for Naturalization in the United States." *International Migration Review* 35(4): 997–1029.

Joppke, Christian. 1998. "Immigration Challenges the Nation-State." In *Challenge to the Nation-State*, edited by Christian Joppke, 5–46. Oxford: Oxford University Press.

Joppke, Christian. 1999. "How Immigration is Changing Citizenship: A Comparative View." *Ethnic and Racial Studies* 22 (4):629–652.

Joppke, Christian. 2005. *Selecting by Origin: Ethnic Migration in the Liberal State*. Cambridge, MA: Harvard University Press.

Joppke, Christian. 2007. "Transformation of Citizenship: Status, Rights, Identity."

*Citizenship Studies* 11(1): 37-48.

Joppke, Christian, and Ewa Morawska. 2014. "Integrating Immigrants in Liberal Nation-States: Policies and Practices." In *Toward Assimilation and Citizenship: Immigrants in Liberal Nation-States*. Palgrave Macmillan UK.

Jurado, Elena. 2008. "Citizenship: Tool or Reward? The Role of Citizenship Policy in the Process of Integration". London: Policy Network Paper.

Kadirbeyođlu, Zeynep. 2007. "National Transnationalism: Dual Citizenship in Turkey." In *Dual Citizenship in Europe: From Nationhood to Societal Integration*, edited by Thomas Faist. Aldershot, UK: Ashgate.

Kadirbeyođlu, Zeynep. 2009. "Changing Conceptions of Citizenship in Turkey." In *Citizenship Policies in the New Europe*, edited by Rainer Bauböck, Bernhard Perchinig and Wiebke Sievers. Amsterdam: Amsterdam University Press.

Kadirbeyođlu, Zeynep. 2009. "Country Report: Turkey." EUDO Citizenship Observatory Country Reports.

Kadirbeyođlu, Zeynep. 2012. "Country Report on Citizenship Law: Turkey." EUDO Citizenship Observatory Country Reports.

Kadirbeyođlu, Zeynep. 2013. "Naturalisation Procedures for Immigrants in Turkey." EUDO Citizenship Observatory Country Reports.

Kadıođlu, Ayşe. 2007. "Denationalization of Citizenship? The Turkish Experience." *Citizenship Studies* 11(3): 283-299.

Kaiser, Bianca. 2007. "Türkiye'deki Avrupa Birliđi Yurttaşları: Siyasal ve Toplumsal Katılımın Önündeki Engeller." In *Kökler ve Yollar: Türkiye'de Göç Süreçleri*, edited by Ayhan Kaya and Bahar Şahin, 475-489. Istanbul Bilgi Üniversitesi Yayınları: Istanbul.

Kalekin- Fishman, Devorah, and Pirrko Pitkänen. 2007. *Multiple State Membership and Citizenship In The Era of Transnational Migration*. Rotterdam and Taipei: Sense.

Karaçay, Biriz A. 2011. "Bir Göç Sisteminin Anatomisi: Türkiye-Rusya Örneđi." PhD



Dissertation, Marmara University.

Karaçay, Biriz A. 2015. "Towards a Turkish-Russian Migration System: Pioneers and Followers." *Turkish Review* 5(5): 376-383.

Kaşka, Selmin. 2009. "The New International Migration and Migrant Women in Turkey: The Case of Moldovan Domestic Workers." In *Land of Diverse Migrations: Challenges of Emigration and Immigration in Turkey*, edited by Ahmet İçduygu and Kemal Kirişçi, 725-788. Istanbul Bilgi University Press: Istanbul.

Kaya, Ayhan. 2012. "Comprehensive Report on Turkey: The Myth of Tolerance." New Knowledge Country Synthesis Reports. Istanbul Bilgi University 5.

Kaya, Ayhan. 2012a. "Transnational Citizenship: German-Turks and Liberalizing Citizenship Regimes." *Citizenship Studies* 16(2): 153-172.

Keyman, Fuat, and Tuba Kancı. 2011. "A Tale of Ambiguity: Citizenship, Nationalism and Democracy in Turkey." *Nations and Nationalism* 17(2): 318-336.

King, Russell, Mirela Dalipaj, and Nicola Mai. 2006. "Gendering Migration and Remittances: Evidence from Long and Northern Albania." *Population, Space and Place* 12 (6):409-434.

Kirişçi, Kemal. 2000. "Disaggregating Turkish Citizenship and Immigration Practices." *Middle Eastern Studies* 36(3): 1-22.

Kirişçi, Kemal. 2008. "Migration and National Identity." In *Cambridge History of Turkey*, edited by Reşat Kasaba, 175-198. Cambridge University Press.

Kivisto, Peter, and Thomas Faist. 2007. *Citizenship: Discourse, Theory, and Transnational Prospects*. Malden, MA: Blackwell Pub.

Kivisto, Peter. 2007. "Conclusion: The Boundaries of Citizenship in a Transitional Age." In *Citizenship: Discourse, Theory, and Transnational Prospects*, edited by Peter Kivisto and Thomas Faist. Malden, MA: Blackwell Pub.

Korbin, Stephen. 1997. "Electronic Cash and the End of National Markets." *Foreign Policy* 107: 65-77.

Koslowski, Rey. 2000. *Migrants and Citizens: Demographic Change in the European State System*. Ithaca, NY: Cornell University Press.

Koslowski, Rey. 2003. "Challenges of International Cooperation in a World of Increasing Dual Nationality." In *Rights and Duties of Dual Nationals*, edited by David Martin and Key Hailbronner, 80-127. The Hague: Kluwer Law International.

Kostakopoulou, Dora. 2003. "Why Naturalization?." *Perspectives on European Politics and Society* 4(1).

Kostakopoulou, Dora. 2006. "Thick, Thin and Thinner Patriotisms: Is This All There Is?" *Oxford Journal of Legal Studies* 26 (1):73–106.

Kymlicka, Will, and Wayne Norman. 2000. "Citizenship in Culturally Diverse Societies: Issues, Contexts, Concepts." In *Citizenship in Diverse Societies*, edited by Will Kymlicka and Wayne Norman, 1-41. Oxford: Oxford University Press.

Lafleur, Jean Michel. 2011. "Why do States Enfranchise Citizens Abroad?" *Global Networks* 11 (4): 481–501.

Lafleur, Jean Michel, and María Sanchez-Dominguez. 2014. "The Political Choices of Emigrants Voting in Home Country Elections." *Migration Studies* 2 (1): 1–27.

Lafleur, Jean Michel, and María Sanchez-Dominguez. 2014. "The Political Choices of Emigrants Voting in Home Country Elections." *Migration Studies* 2 (1): 1–27.

Larner, Wendy. 2007. "Expatriate Experts and Globalising Governmentalities: the New Zealand Diaspora Strategy." *Transactions of the Institute of British Geographers* 32 (3): 331–345.

Legomsky, Stephen. 2003. "Dual Nationality and Military Service: Strategy Number Two." In *Rights and Duties of Dual Nationals*, edited by David Martin and Key Hailbronner, 80-127. The Hague: Kluwer Law International.

Leuchter, Noa. 2014. "Creating Other Options: Negotiating The Meanings of Citizenships."

*Citizenship Studies* 18(6-7).

Levitt, Peggy. 2002. Variations in Transnational Belonging: Lessons from Brazil and the Dominican Republic. In *Dual Nationality, Social Rights and Federal Citizenship in the US and Europe: The Reinvention of Citizenship*, edited by Hansen Randall and Patrick Weil. New York: Berghahn Books.

Levitt, Peggy, and Rafael de la Dehesa. 2003. "Transnational Migration and The Redefinition of The State: Variations and Explanations." *Ethnic and Racial Studies* 26:587–611.

Levitt, Peggy, and B. Nadya Jaworsky. 2007. "Transnational Migration Studies: Past Developments and Future Trends." *Annual Review of Sociology* 33 (1): 129–156.

Liebich, André. 2000. "Plural Citizenship in Post-Communist States." *International Journal of Refugee Law* 12 (1): 97–107.

Liebig, Thomas, and Friederike Von Haaren. 2011. "Citizenship and the Socioeconomic Integration of Immigrants and Their Children." In *OECD, Naturalisation: A Passport for the Better Integration of Immigrants?*, 23-57. Paris: OECD.

López-Guerra, Claudio. 2005. "Should Expatriates Vote?" *The Journal of Political Philosophy* 13 (2): 216–234.

Löwenheim, Oded, and Orit Gazit. 2009. "Power and Examination: A Critique of Citizenship Tests." *Security Dialogue* 40 (2): 145-167.

Ludvig, Alice. 2000 *Dealing with Dual Citizenship in Australia and Germany: A Comparison*. Copenhagen: European Consortium of Political Research.

Martin, David A. 1999. "New Rules on Dual Nationality for a Democratic Globe: Between Rejection and Embrace." *Georgetown Immigration Law Journal* 14: 1–34

Martin, David, and Key Hailbronner, eds. 2003. *Rights and Duties of Dual Nationals*. The Hague: Kluwer Law International.

Martin, David. 2003. "Introduction: The Trend Toward Dual Nationality". In *Rights and Duties of Dual Nationals*, edited by David Martin and Key Hailbronner, 3-18. The Hague: Kluwer Law International.

Martiniello, Marco. 2005. "Political Participation, Mobilization and Representation of Immigrants and Their Offspring in Europe." Willy Brandt Series of Working Papers in International Migration and Ethnic Relations 1/05.

Mazzolari, Francesca. 2009. "Dual Citizenship Rights: Do They Make More and Richer Citizens?." *Demography* 46(1):169-191.

Miller, David. 2000. *Citizenship and National Identity*. Oxford: Polity.

Morales, Laura. 2011. "Conceptualizing and Measuring Migrants' Political Inclusion." In *Social Capital, Political Participation and Migration in Europe. Making Multicultural Democracy work?*, edited by Laura Morales and Marco Giugni, 19-42. Basingstoke-New York, Palgrave MacMillan.

Morawska, Ewa. 2003. "Immigrant Transnationalism and Assimilation: A Variety of Combinations and The Analytic Strategy It Suggests", In *Toward Assimilation and Citizenship: Immigrants in Liberal Nation-States*, edited by Joppke, Christian, and Ewa Morawska. Palgrave Macmillan UK.

Mügge, Liza. 2012. "Managing Transnationalism: Continuity and Change in Turkish State Policy." *International Migration Review* 50: 20–38.

Mügge, Liza. 2012a. "Dual Nationality and Transnational Politics." *Journal of Ethnic and Migration Studies* 38 (1): 1–19.

Munro, Daniel. 2008 "Integration Through Participation: Non-Citizen Resident Voting Rights in an Era of Globalization." *International Migration and Integration* 9:43-80.

Naujoks, Daniel. 2009. "Dual Citizenship. The Discourse on Ethnic and Political Boundary-Making in Germany." *Focus Migration Policy* 14.

Odmalm, Pontus. 2005. *Migration Policies and Political Participation: Inclusion or Intrusion in Western Europe?*. Palgrave Macmillan.

Oers, Van Ricky. 2013. *Deserving Citizenship. Citizenship Tests in Germany, the Netherlands and the United Kingdom*. Wolf Legal Publishers: Netherlands.

Oers, Van Ricky, and Becky de Hart. 2006. "Trends in Nationality Law." In *Acquisition and Loss of Nationality. Policies and Trends in 15 European Countries*, edited by Rainer

Bauböck, Eva Ersbøll, Kees Groenendijk, and Harald Waldrauch. Amsterdam : Amsterdam University Press.

Okyay, Asli. 2014. "External Voting to be Implemented for the First Time in Turkey's Forthcoming Presidential Elections."

Ong, Aihwa. 1999. *Flexible Citizenship*. Durham, NC: Duke University Press.

Osaki, Keiko. 1999. "Economic Interactions of Migrants and Their Households of Origin: Are Women More Reliable Supporters?" *Asian and Pacific Migration Journal* 8 (4):447-471.

Østergaard-Nielsen, Eva, ed. 2003. *International Migration and Sending Countries: Perceptions, Policies and Transnational Relations*. Basingstoke, Palgrave MacMillan.

Østergaard-Nielsen, Eva. 2003. "The Politics of Migrants' Transnational Political Practices." *International Migration Review* 37: 760–786.

Østergaard-Nielsen, Eva. 2008. "Dual Citizenship: Policy Trends and Political Participation in EU Member States." Workshop organized by the Committee on Constitutional Affairs 25. Brussels: European Parliament.

Østergaard-Nielsen, Eva. 2001. Transnational Political Practices and The Receiving State: Turks and Kurds in Germany and The Netherlands. *Global Networks*.

Özgür Baklacioğlu, Nurcan. 2006. "Dual Citizenship, Extraterritorial Elections and National Policies: Turkish Dual Citizens in the Bulgarian-Turkish Political Sphere." In *Beyond Sovereignty: From Status Law to Transnational Citizenship?*, edited by Osamu Ieda, 319–358. Sapporo: Slavic Research Center.

Parla, Ayşe. 2011. "Labor Migration, Ethnic Kinship, and The Conundrum of Citizenship In Turkey." *Citizenship Studies* 15(3-4): 457-70.

Penninx, Rinus. 2003. "Integration: The Role of Communities, Institutions, and the State." *Migration Policy Institute*.

Penninx, Rinus. 2004. "The Logic of Integration Policies: an Exercise in Policy Thinking." Lecture at CEDEM, University of Liège.

Phalet, Karen, and Marc Swyngedouw. 2003. "Measuring Immigrant Integration: the Case of Belgium." *Migration Studies* 773-804.

Pikkov, Deanna. 2011. "The Practice of Voting: Immigrant Turnout, the Persistence of Origin Effects, and the Nature, Formation and Transmission of Political Habit." PhD Dissertation. Toronto: University of Toronto.

Pogonyi, Szabolcs. 2011. "Dual Citizenship and Sovereignty." *The Journal of Nationalism and Ethnicity* 39(5):685-704.

Poiedynok, Olga. 2015. "Dual Citizenship: Ukrainian Approach." *European Political and Law Discourse* 2(4). Accessed August 9, 2016.

<http://eppd13.cz/wp-content/uploads/2015/2015-2-4/18.pdf>.

Preston, Valerie, Matti Siemiatycki, and Audrey Kobayashi. 2007. "Dual Citizenship among Hong Kong Canadians: Convenience or Commitment?." In *Dual citizenship in Global Perspective: From Unitary to Multiple Citizenship*, edited by Thomas Faist and Peter Kivisto, 203-223. New York: Palgrave Macmillan.

Pusch, Barbara. 2015. "Dual Citizenship in the Transnational German-Turkish Space: Notes From Germany." Report for Sabancı University Istanbul Policy Center, Stiftung Mercator Initiative.

Pusch, Barbara, and Julia Splitt. 2013. "Binding the Almanci to the "Homeland"-Notes from Turkey." *Perceptions* 18 (3): 129.

Renshon, Stanley Allen. 2000. *Dual Citizens in America: An Issue of Vast Proportions and Broad Significance*. Washington, DC: Center for Immigration Studies.

Renshon, Stanley Allen. 2001. *Dual Citizenship and American National Identity*. Washington, DC: Center for Immigration Studies.

Renshon, Stanley Allen. 2005. *The 50% American: Immigration and National Identity In An Age Of Terror*. Georgetown University Press.

Rubenstein, Kim. 2003. "Review Essay: The Centrality of Migration to Citizenship." *Citizenship Studies* 7(2): 255-265.

Rubio-Marín, Ruth. 2006. "Transnational Politics and Democratic Nation-state: Normative Challenges of Expatriate Voting and Nationality Retention of Emigrants." *New York University Law Review* 81 (1): 117–147.

Salenko, Alexander. 2012. "EUDO Citizenship Observatory Country Report: Russia." Accessed August 2, 2016.

<http://eudo-citizenship.eu/docs/CountryReports/Russia.pdf> .

Sassen, Saskia. 1996. "Losing Control? Sovereignty in an Age of Globalization." *Columbia University Leonard Hastings Schoff Memorial Lectures*. New York: Columbia University Press.

Sassen, Saskia. 2002. "Towards Post-National and Denationalized Citizenship." <http://saskiasassen.com/PDFs/publications/Towards-post-national-and-denationalized-citizenship.pdf>

Schlenker, Andrea, Joachim Blatter, and Ieva Birka. 2016. "Practising Transnational Citizenship: Dual Nationality and Simultaneous Political Involvement among Emigrants." *Journal of Ethnic and Migration Studies* 43:3.

Schlenker, Andrea. 2015. "Divided Loyalty? Political Participation and Identity of Dual Citizens in Switzerland." *European Political Science Review*.

Schuck, Peter. 2002 "Plural Citizenships." In *Dual Nationality, Social Rights, and Federal Citizenship in the US and Europe: The Reinvention of Citizenship*, edited by Randall Hansen and Patrick Weil, 61-99. New York: Berghahn Books.

Sejersen, Tanja B. 2008. "'I Vow to Thee My Countries': The Expansion of Dual Citizenship in the 21st Century." *The International Migration Review* 42 (3):523-549.

Shevel, Oxana. 2013. "EUDO Citizenship Observatory Country Report: Ukraine." Accessed August 20, 2016.

<http://eudo-citizenship.eu/docs/CountryReports/Ukraine.pdf> .

Spiro, Peter. 1997. "Dual Nationality and the Meaning of Citizenship." *Emory Law Journal* 46: 1466– 1468.

Spiro, Peter. 1998. *Embracing Dual Nationality*. Carnegie Endowment for International Peace.

Sirman, Nükhet. 2005. "The Making of Familial Citizenship in Turkey." In *Citizenship in a Global World – European Questions and Turkish Experiences*, edited by Fuat Keyman and Ahmet İçduygu, 147-172. London: Routledge.

Smilov, Daniel, and Elena Jileva. 2013. "EUDO Citizenship Observatory Country Report: Bulgaria." Accessed August 3, 2016.

<http://eudo-citizenship.eu/admin/?p=file&appl=countryProfiles&f=2013-22-Bulgaria.pdf>.

Soyarık, Nalan. 2000. "The Citizen of the State and the State of the Citizen: An Analysis of the Citizenship Process in Turkey." PhD Dissertation. Bilkent University.

Soysal, Yasemin Nuhoglu. 1994. *Limits of Citizenship: Migrants and Postnational Membership in Europe*. Chicago: University of Chicago Press.

Spiro, Peter. 1994. "The States and Immigration in an Era of Demi-Sovereignties." *Virginia Journal of International Law* 35:121-78.

Spiro, Peter. 2003. "Political Rights and Dual Nationality." In *Rights And Duties Of Dual Nationals*, edited by David Martin and Key Hailbronner, 80-127. The Hague: Kluwer Law International.

Spiro, Peter. 2010. "Dual Citizenship as Human Right." *International Journal of Constitutional Law* 8:111-130.

Stasiulis, Daniel, and Daryl Roos. 2006. "Security, Flexible Sovereignty and the Perils of Multiple Citizenship." *Citizenship Studies* 10(3): 329–348.

Staton, Jeffrey, Robert Jackson, and Damarys Canache. 2007. "Dual Nationality Among Latinos: What Are The Implications For Political Connectedness?." *Journal of Politics* 69(2):470–482.



Studemeyer, Catherine Cottrell. 2015. "Geographies of Flexible Citizenship." *Geography Compass* 9(10):565–576.

Syrian Law Journal (SLJ). 2016. "The Right to Syrian Nationality." Accessed August 13, 2016.

<http://www.syrianlawjournal.com/index.php/right-syrian-nationality/>.

Tiryakioğlu, Bilgin. 2006. "Dual Citizenship and its Consequences in Turkish Law." *Ankara Law Review* 3(1): 1-16.

Toktaş, Şule. 2006. "Turkey's Jews and Their Immigration to Israel." *Middle Eastern Studies* 42(3): 505-519.

Triadafilopoulos, Triadafilos. 2007. "Dual Citizenship and Security Norms in Historical Perspective." In *Dual Citizenship in Global Perspective: From Unitary To Multiple Citizenship*, edited by Thomas Faist and Peter Kivisto, 27-41. New York: Palgrave Macmillan.

Tsuda, Takeyuki. 2012. "Whatever Happened to Simultaneity? Transnational Migration Theory and Dual Engagement in Sending and Receiving Countries." *Journal of Ethnic and Migration Studies* 38 (4): 631-649.

UK Home Office Border Agency, European Country of Origin Information Network (ECOI). "Syria Country of Origin Information." Accessed August 15, 2012.

[http://www.ecoi.net/file\\_upload/1226\\_1345464874\\_coir-syria-ukba-12-08-15.pdf](http://www.ecoi.net/file_upload/1226_1345464874_coir-syria-ukba-12-08-15.pdf).

Uluocak, Nihal. 1983. "Türk Vatandaşlığı Kanununda Çifte Vatandaşlık İlkesinden Yararlanma Olanığı." *Milletlerarası Hukuk ve Milletlerarası Özel Hukuk Bülteni* 3(1).

United Nations High Commissioner for Refugees (UNHCR) Refworld Azerbaijan. "Azerbaijani Nationality Law." Accessed August 20, 2016.  
<http://www.refworld.org/pdfid/3ae6b52717.pdf>.

United Nations High Commissioner for Refugees (UNHCR) Refworld Iraq. "Iraqi Nationality Law." Accessed August 20, 2016.

<http://www.refworld.org/pdfid/4b1e364c2.pdf>.

United Nations High Commissioner for Refugees (UNHCR) Refworld Syria. "Syria Nationality Law." Accessed August 20, 2016. <http://www.refworld.org/pdfid/4d81e7b12.pdf>.

United Nations High Commissioner for Refugees (UNHCR) Refworld Turkmenistan. "Turkmenistan: Law of 2013 on Citizenship." Accessed August 9, 2016. <http://www.refworld.org/docid/527235634.html> .

United Nations High Commissioner for Refugees (UNHCR) Refworld Uzbekistan. "Law on Citizenship in the Republic of Uzbekistan." Accessed August 9, 2016. <http://www.refworld.org/docid/3ae6b4d3c.html> .

United Nations Human Rights Office of the High Commissioner (OHCHR) Uzbekistan. "On The Laws and Practices of The Republic of Uzbekistan Regarding The Rights of Citizens To Free Movement and Choice of Residence." Accessed August 9, 2016. [http://www2.ohchr.org/english/bodies/hrc/docs/ngos/UGFHR\\_Uzbekistan98.pdf](http://www2.ohchr.org/english/bodies/hrc/docs/ngos/UGFHR_Uzbekistan98.pdf) .

Ünver, Can. 2013. "Changing Diaspora Politics of Turkey and Public Diplomacy." *Turkish Policy Quarterly* 12(1):181-189.

Vertovec, Steven. 2004. "Migrant Transnationalism and Modes of Transformation." *International Migration Review* 38 (3): 970-1001.

Vink, Maarten P. 2013. "Immigrant Integration and Access to Citizenship in the European Union: The Role of Origin Countries." *INTERACT*, Researching Third Country Nationals' Integration as a Three-way Process - Immigrants, Countries of Emigration and Countries of Immigration as Actors of Integration Research Report Position Paper.

Vink, Maarten Peter, Tijana Prokic-Breuer, and Jaap Dronkers. 2013. "Immigrant Naturalization in the Context of Institutional Diversity: Policy Matters, But to Whom?." *International Migration* 51 (5): 1-20.

Vonk, Olivier. 2012. *Dual Nationality in the European Union. A Study on Changing Norms in Public and Private International Law and in the Municipal Laws of Four EU Member States*. Leiden/Boston: Martinus Nijhoff Publishers.

Walker, Neil. 2008. "Denizenship and Deterritorialization in the EU". European University

Institute: Law Working Papers.

Warikoo, Kulbushan. 2005. "Russians in Post-Soviet Central Asia: Issues and Concerns." In *Central Asia and the Caucasus: Transnationalism and Diaspora*, edited by Touraj Atabaki and Sanjyot Mehendale, 60-80. Routledge.

Wimmer, Andreas, and Glick Schiller. 2002. "Methodological Nationalism and Beyond: Nation-State Building, Migration and The Social Sciences." *Global Networks* 2: 301–334.

Wodak, Ruth. 2013. "Dis-Citizenship and Migration: A Critical Discourse- Analytical Perspective." *Journal of Language, Identity and Education* 12(3): 173-178.

