

T.C.
BAŞKENT ÜNİVERSİTESİ
AVRUPA BİRLİĞİ VE ULUSLARARASI İLİŞKİLER ENSTİTÜSÜ
SİYASET BİLİMİ VE ULUSLARARASI İLİŞKİLER
ANABİLİM DALI
AVRUPA BİRLİĞİ YÜKSEK LİSANS PROGRAMI

“THE CITIZENSHIP POLICIES OF THE BALTIC STATES:
DO THEY CONFORM TO THE EUROPEAN
FRAMEWORK?”

HAZIRLAYAN
Mehmet Oğuzhan TULUN

DANIŞMAN
Yrd. Doç. Dr. Nalan SOYARIK ŞENTÜRK

ANKARA – 2012

Mehmet Oğuzhan Tulun tarafından hazırlanan, “The Citizenship Policies of the Baltic States: Do They Conform to the European Framework?” adlı bu çalışma jürimizce Yüksek Lisans Tezi olarak kabul edilmiştir.

Kabul (sınav) Tarihi: 25 / 01 / 2012

Jüri Üyesi: Yrd. Doç. Dr. Nalan SOYARIK ŞENTÜRK

Jüri Üyesi: Doç. Dr. İsmail AYDINGÜN

Jüri Üyesi: Prof. Dr. Simten COŞAR

ACKNOWLEDGMENTS

I would like to express my deepest gratitude to my supervisor Asst. Prof. Nalan Soyarik Şentürk. Her patience, advice, and guidance were critical components for the successful completion of this thesis.

I would also like to express my deepest gratitude to my family and closest friends. The motivation and support they have given me were instrumental in helping me carry on during the many frustrating moments I encountered while writing this thesis.

Mehmet Oğuzhan TULUN

Mehmet Oğuzhan Tulun, “The Citizenship Policies of the Baltic States: Do They Conform to the European Framework?”

ABSTRACT

The purpose of this thesis is to evaluate whether or not the citizenship policies of the Baltic states conform to the European Union framework. The Baltic states within this context are Estonia, Latvia, and Lithuania. The citizenship policies that are of concern here are those that have affected the Russian-speaking minority living in the Baltic states. These citizenship policies are evaluated within the framework of EU’s liberal democratic tradition and its membership criteria. Prior to the evaluation of these citizenship policies; this thesis provides definitions for the relevant terms, an account of Baltic history, and also an account of the citizenship policies. These are provided to give a historical and theoretical context to the evaluation of the citizenship policies. This thesis concludes that Lithuania’s citizenship policy conforms, while Estonia’s and Latvia’s citizenship policies do not conform to the European framework. This evaluation is based on the fact that Estonia’s and Latvia’s citizenship policies have created a situation in which Russian-speaking minority have difficulty acquiring citizenship, and thus have resulted in a democratic shortcoming that is against EU’s liberal democratic tradition and its membership criteria. Lithuania’s citizenship policy has created no such problem, and is therefore in conformity with the European framework. This thesis’ conclusion leads to a further conclusion: the EU, based on its notion of

European kinship, behaves differently towards different EU candidates. Therefore this thesis concludes that, in terms of EU's behavior with regards enlargement, what are written down as rules are not always adhered to in practice.

Key Words: Baltic states, citizenship, Russian minority, European Union, enlargement

**Mehmet Oğuzhan Tulun, “Baltık Devletlerinin Vatandaşlık Politikaları:
Avrupa Çerçevesine Uyuyorlar mı?”**

ÖZET

Bu tezin amacı, Baltık devletlerinin vatandaşlık politikalarının Avrupa Birliği'nin belirlediği çerçeveye uyup uymadıklarını değerlendirmektir. Bu bağlamda, bahsi geçen Baltık devletleri Estonya, Letonya ve Litvanya'dır. Tez konusunu ilgilendiren vatandaşlık politikaları, Baltık devletlerinde yaşayan, Rusça konuşan azınlığı etkileyen vatandaşlık politikalarıdır. İlgili vatandaşlık politikaları, Avrupa Birliği'nin liberal demokratik geleneğinin ve üyelik şartlarının oluşturduğu çerçevede değerlendirilmektedir. Vatandaşlık politikalarının değerlendirilmesinden önce konuyla alakalı kavramlar tanımlanmakta, Baltık tarihi hakkında bilgi verilmekte ve vatandaşlık politikalarının içeriği anlatılmaktadır. Bu bilgiler, vatandaşlık politikalarının değerlendirilmesini tarihi ve teorik bir çerçeveye oturtmak için verilmektedirler. Bu tez, Litvanya'nın vatandaşlık politikasının Avrupa çerçevesine uyduğu, Estonya'nın ve Litvanya'nın vatandaşlık politikalarının ise bu çerçeveye uymadığı sonucuna varmaktadır. Bu sonuca varılmasının nedeni, Estonya'nın ve Letonya'nın vatandaşlık politikalarının Rusça konuşan azınlığın vatandaşlık elde etmesinde sorun çıkarmaları ve dolayısıyla, Avrupa Birliği'nin liberal demokratik geleneğine ve üyelik şartlarına aykırı bir demokrasi eksikliği yaratmalarındır.

Litvanya'nın vatandaşlık politikası ise, bu tür bir sorun çıkarmadığı için Avrupa Birliği'nin belirlediği çerçeveye uymaktadır. Bu tezin sonucundan yola çıkılarak bir başka sonuca daha varılmaktadır: Avrupa Birliği, Avrupa kardeşliği anlayışına dayalı olarak farklı aday ülkelere farklı şekilde davranmaktadır. Bu bağlamda Avrupa Birliği, genişleme söz konusu olduğunda yazılı olan kurallarını pratikte her zaman uygulamamaktadır.

Anahtar Kelimeler: Baltık devletleri, vatandaşlık, Rus azınlık, Avrupa Birliği, genişleme

TABLE OF CONTENTS

ACKNOWLEDGMENTS	i
ABSTRACT	ii
ÖZET	iv
TABLE OF CONTENTS	vi
LIST OF ABBREVIATIONS	x
INTRODUCTION	1
CHAPTER I: AN ACCOUNT OF CITIZENSHIP AND NATIONALISM	5
1.1. INTRODUCTION	5
1.2. CITIZENSHIP	6
1.2.1. The Complex Nature of Citizenship	7
1.2.2. The Evolving Nature of Citizenship	8
1.2.3. The Definition of Citizenship	16
1.2.4. Theories Regarding Citizenship	22
1.3. NATIONALISM	27
1.3.1 Definition of Nationalism	28
1.3.2. Theories Regarding Nationalism	29
1.3.3. Nationalism's Relationship with Different Democracy Models	34
1.4. CONCLUSION	38
CHAPTER II: THE HISTORY OF THE BALTIC STATES	43
2.1. INTRODUCTION	43

2.2. ORIGINS OF ESTONIANS, LATVIANS, AND LITHUANIANS	44
2.3. THE PERIOD FROM THE BALTIC CRUSADE TO THE FIRST WORLD WAR	45
2.3.1 The Baltic Crusade	45
2.3.2. The End of Teutonic Knights' Rule	47
2.3.3. Lithuania's Rise to and Fall from Power	48
2.3.4. Russian Rule and the First Instance of Russification	50
2.3.5. Estonia's, Latvia's, and Lithuania's Establishment as Independent States	56
2.4. THE PERIOD FROM THE SECOND WORLD WAR TO THE END OF SOVIET RULE	59
2.4.1. The Second World War and the Loss of Independence	59
2.4.2. Soviet Rule and the Second Instance of Russification	61
2.4.3. Cultural Suppression	64
2.4.4. The Change in the Ethnic Composition of the Baltic States	66
2.4.5. The End of Soviet Rule and the Path to Independence	67
2.5. THE PERIOD OF POST-SOVIET INDEPENDENCE	73
2.6. CONCLUSION	76
CHAPTER III: THE CITIZENSHIP POLICIES OF THE BALTIC STATES	79
3.1. INTRODUCTION	79
3.2. BALTIC STATES' HISTORICAL REASONS FOR THEIR PRESENT ACTIONS	82

3.3. THE BALTIC STATES FROM THE PERSPECTIVE OF DIFFERENT DEMOCRACY MODELS	84
3.4. THE CITIZENSHIP POLICIES OF LITHUANIA	87
3.4.1. Lithuania's Policies	87
3.4.2. The Domestic Consequences Of Lithuania's Policies	89
3.5. THE CITIZENSHIP POLICIES OF ESTONIA AND LATVIA	92
3.5.1. Estonia's Policies	94
3.5.2. Latvia's Policies	98
3.5.3. The Domestic Consequences of Estonia's and Latvia's Policies	101
3.5.4. The International Community's Response, and Estonia and Latvia's Policy Changes	107
3.5.5. The Implications of Estonia's and Latvia's EU Accession	114
3.6. CONCLUSION	117
CHAPTER IV: EVALUATION OF THE CITIZENSHIP POLICIES	121
4.1. INTRODUCTION	121
4.2. EU'S BASIC PRINCIPLES AND ITS CONCEPTION OF CITIZENSHIP	122
4.3. THE IMPLICATIONS OF ESTONIA'S AND LATVIA'S CITIZENSHIP POLICIES	125
4.3.1. Current Implications	125
4.3.2. Implications at the Time of Estonia's and Latvia's EU Accession	126

4.4. THE EU'S RATIONALE BEHIND ALLOWING FOR ESTONIA'S AND LATVIA'S ACCESSION	130
4.4.1. The EU's Rationale for Enlargement	130
4.4.2. A Special Rationale for Enlargement: European Reunification	134
4.5. DIFFERENT TREATMENT FOR DIFFERENT CANDIDATE STATES	138
4.6. THE EU'S ABSORPTION CAPACITY	140
4.7. THE EU'S UNIQUE NATURE AND ITS IMPLICATIONS	142
4.8. CONCLUSION	144
CONCLUSION	146
BIBLIOGRAPHY	150

LIST OF ABBREVIATIONS

CEE	: Central and Eastern Europe
EU	: European Union
KGB	: Komitet gosudarstvennoy bezopasnosti (Committee for State Security)
NATO	: North Atlantic Treaty Organization
OSCE	: Organization for Security and Co-operation in Europe
USSR	: Union of Soviet Socialist Republics

INTRODUCTION

Prior to the declaration of their independence in 1990, the Baltic states of Estonia, Latvia, and Lithuania had been a part of the Soviet Union since 1948, and had been ruled under communist regimes. As a result of Soviet policies, a large Russian-speaking minority¹ made up of Russians, Ukrainians, and Belarusians has been a part of the Baltic states for about sixty years now. This minority's presence is reflected in the demographics of Baltic states. Estonia's population is sixty nine percent ethnic Estonian, while twenty nine percent is comprised of the Russian minority.² In Latvia; these figures are sixty two percent for ethnic Latvians, and thirty two percent for the Russian minority.³ Finally, in Lithuania; these figures are eighty four percent for ethnic Lithuanians, and eight percent for the Russian minority.⁴

The demographic situation in these three states had an impact on the way they behaved after they achieved their independence. After their declaration of independence, these three states sought to leave their Soviet past behind, and

¹ The Russian-speaking minority is usually referred to as "the Russian minority".

² "Estonia at a Glance," *Estonia.eu: Official Gateway to Estonia* website, (<http://estonia.eu/about-estonia/country/estonia-at-a-glance.html>), accessed February 3, 2012.

³ "Population Census 2011 – Key Indicators," *Central Statistical Bureau of Latvia* website, (<http://www.csb.gov.lv/en/statistikas-temas/population-census-2011-key-indicators-33613.html>), accessed February 3, 2012.

⁴ "Quick Facts," *The Official Gateway of Lithuania* website, (http://lietuva.lt/en/about_lithuania/quick_facts), accessed February 3, 2012.

enact policies that reflected their own interests; something they were not allowed to do under the strict rule of the Soviet Union. One such policy area was concerning citizenship, the Baltic states were now free to decide who would be eligible to become their citizens. People who had been citizens of the Baltic states during their brief period of independence between the two world wars, and the descendants of these citizens, were naturally considered to be citizens of post-1990 Baltic states. Within this context the Baltic states were faced with the question of how deal with the large Russian-speaking minority that had started living in the Baltic states during Soviet rule. After establishing their independence, the Baltic states had to decide whether or not to grant citizenship to this minority group that had been brought into the Baltic region against the will of the Baltic states. Based on considerations related to their demographics, Lithuania decided to grant citizenship to the Russian minority, while Estonia and Latvia initially chose not to do so.

The Baltic states' interaction with the European Union (EU) is important in this regard, because all three Baltic states wished to become EU members. In order to become EU members, all three states had to go through a democratization process, which included the necessity of enacting inclusive citizenship policies. Lithuania posed no problem in this regard because it behaved in an inclusive manner towards the Russian minority from the start. Estonia and Latvia, however, posed a problem due to their exclusive stance towards the Russian minority. Through a series of reforms, Estonia and Latvia adopted a more inclusive approach towards the Russian minority. Despite the ongoing citizenship problem

of the Russian minority in Estonia and Latvia, all three Baltic states became EU members in 2004. Based on the citizenship problem of the Russian minority, these three Baltic states did not become EU members under the same domestic conditions.

Today, as a result of its inclusive approach, less than one point two percent of Lithuania is without citizenship.⁵ The overwhelming majority of the Russian minority living in Lithuania had already acquired their citizenship as early as 1991. The situation is different in Estonia and Latvia. Despite reforms, the citizenship problem of the Russian minority continues to be a problem in both Estonia and Latvia. Seven percent of Estonia⁶ and fourteen percent of Latvia⁷ is still without citizenship.

⁵ I have not been able to find an official source on the current citizenship percentage in Lithuania. I have, however, calculated that in 1991 only one point two percent of Lithuania was without citizenship. This is because Lithuania had a population of three point six million in 1989. At that time, the Russian minority comprised about twelve percent of Lithuania. As shall I elaborate on in Chapter III, in 1989 Lithuania extended citizenship to all its permanent residents. This offer of citizenship extension ended in 1991, and by this time about ninety percent of the Russian minority had chosen to become citizens. The remaining non-citizen members of the Russian minority comprised about one point two percent of Lithuania in 1991. Since 1991, Lithuania's population has gone down, and the Russian minority percentage in terms of the overall population has dropped. Meanwhile the remaining non-citizen members of the Russian minority have continued to acquire citizenship after 1991, meaning that the over-all percentage of non-citizens in Lithuania must have gone down since 1991. For reference on Lithuania's population in 1989, please see; "Population censuses in Lithuania," *Statistics Lithuania* website, (<http://www.stat.gov.lt/en/pages/view/?id=3433&PHPSESSID=>), accessed February 3, 2012. For reference on Lithuania's ethnic composition in 1989, please see; Anton Steen, "Ethnic Relations, Elites and Democracy in the Baltic," *Journal of Communist Studies and Transition Politics*, 16, 4, (2000): pp. 68-87, pp. 71-72.

⁶ "Citizenship," *Estonia.eu: Official Gateway to Estonia* website, (<http://estonia.eu/about-estonia/society/citizenship.html>), accessed February 3, 2012.

⁷ Central Statistical Bureau of Latvia, "Population Census 2011...".

Based on the situation described above, this thesis seeks to answer the following question: do the citizenship policies of the Baltic states conform to the European framework? The case of Lithuania offers a straightforward answer because it had adopted an inclusive citizenship policy from the start. The case of Estonia and Latvia is more complex, since their citizenship policies were subject to reform during Estonia's and Latvia's EU candidacy process. In case of all three Baltic states, however, certain background information must be given to provide a historical and theoretical context to the evaluation of the above question. Within this context, excluding the introduction and conclusion, this thesis has been divided into four chapters:

The first chapter provides a theoretical background by giving an account of two important terms: citizenship and nationalism. Citizenship is directly related to the question this thesis seeks to answer, while nationalism has played a key role in the establishment independent Baltic states. The second chapter gives an account of the history of the Baltic states. This historical account provides the reasons for the Baltic states' behavior with regards to the Russian minority. The third chapter gives an account of the citizenship policies of the Baltic states. This account provides the details of the citizenship policies of the Baltic states, and also explains how they changed in the years after 1990. The fourth chapter evaluates whether or not the citizenship policies of the Baltic states conform to the European framework, and draws several conclusions from this evaluation.

CHAPTER I:

AN ACCOUNT OF

CITIZENSHIP AND NATIONALISM

1.1. INTRODUCTION

This chapter will elaborate upon two important terms for this thesis: citizenship and nationalism. The term citizenship is important because it is directly related to the question this thesis seeks to answer: Do the citizenship policies of the Baltic states conform to the European Framework? The citizenship policies of the Baltic states cannot be properly analyzed without having a clear understanding of what citizenship means. Therefore, citizenship must be explained in detail before proceeding to answer the above question. In order to explain citizenship in detail, this chapter will cover the following topics: the complexity and the evolving nature of citizenship, the definition of citizenship, and finally the various theories regarding citizenship.

The term nationalism is important because it is the reason why the Baltic states strove to be independent from foreign influences. Through their independence they were able to form citizenship policies based on their own will. Nationalism also had a defining effect on what the Baltic states wished to accomplish with their citizenship policies. Therefore, understanding what nationalism is will make it possible to better understand the rationale behind

Baltic states' citizenship policies. In terms of nationalism, the topics that this chapter will cover are: nationalism's definition, two main theories regarding nationalism, and finally nationalism's relationship with different democracy models.

1.2. CITIZENSHIP

Citizenship is a complex term in the sense that its extent, content, and depth are open to interpretation. It is also term that evolves throughout time. Due to the complex and evolving nature of citizenship, it is difficult to give citizenship a definition that will satisfy all those involved in studies on citizenship.

One of the oldest definitions for citizenship can be found in the Ancient Greek philosopher Aristotle's work *Politics*.⁸ Aristotle defines a citizen as a male member of a city-state that is able and willing to act both as a juryman and as a member of the citizen assembly. The citizen in Aristotle's conception is a man who directly participates in the ruling of his city-state, but who is also subject to being ruled by his fellow citizens. Aristotle's conception of citizenship was based on and limited by his experiences of the ancient city-state of Athens. Citizenship as a term has gone through change and has become more complex since the times of the Ancient Greece. A proper definition of citizenship must take into account this complex and evolving nature of citizenship.

⁸ W. D. Ross, *Aristotle: a complete exposition of his works & thought*, (New York: The World Publishing Company, 1963), pp. 240-241.

1.2.1. The Complex Nature of Citizenship

Although it has gone through change throughout time, citizenship has always been about a distinct political bond between individuals and a state that brings about a set of rights and responsibilities.⁹ Citizenship is complex in the sense that the extent, content, and depth of the political bond it entails are open to interpretation.¹⁰

In terms of extent, what are open to interpretation are the boundaries of the bond; as in who will be included in this bond, and who will be excluded. In order for this type of bond to exist and be functional, it must be determined who will be allowed to acquire it (and how). And even if one tries to be as inclusive as possible, in the words of Engin Işın and Bryan Turner, “that which includes must by definition exclude.”¹¹ Therefore, even under the best circumstances, certain groups of people will inevitably be left out as result of the way this is formulated.

In terms of content, what are open to interpretation are the rights and responsibilities that are borne out of this political bond. Giving a definite account of which rights and responsibilities are included in citizenship is not possible, because states in the international system all have varying stances on what citizenship entails. And this holds true even for states with political regimes that

⁹ Richard Bellamy, *Citizenship: A Very Short Introduction*, (Oxford: Oxford University Press, 2008), p. 3.

¹⁰ Engin F. Işın and Bryan S. Turner, “Citizenship Studies: An Introduction,” in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications, 2002), pp. 2, 4.

¹¹ Işın and Turner, “Citizenship Studies...,” p. 5.

are similar to each other.¹² It is possible to give a more specific account of what citizenship entails by focusing on one type of political regime, but it must be kept in mind that rights and responsibilities are subject to change. Based on either the outcome of public debate or based solely on the decision a state; rights and responsibilities can be increased or decreased in their scope, or can be altogether annulled.¹³

In terms of depth, what is open to interpretation is the identity that comes from having citizenship. In this context, identity is about what it means to be a citizen.¹⁴ Is citizenship simply about a status a person has with a state, or should it be more than (or deeper than) that? Is a citizen supposed to possess certain traits or personal characteristics, or come from a certain social or ethnic background to be considered a proper citizen? What it means to be a citizen is therefore dependent on the answers given to the above questions.

1.2.2. The Evolving Nature of Citizenship

Citizenship evolves it has been subject to change throughout time. It is not something that is static, and it is something that has existed for a long time. Therefore, in order to get a proper understanding of citizenship in general, citizenship in the ancient era must be mentioned before proceeding to citizenship in the modern era.

¹² Işın and Turner, "Citizenship Studies..." p. 3.

¹³ *Ibid.* p.4.

¹⁴ *Ibid.* p. 2.

Citizenship as an idea, at least for the western world, dates back to the ancient Greeks and Romans. Citizenship emerged as an idea in the city-states of Ancient Greece, where a person holding citizenship status was able to rule (through citizen assemblies) and be ruled in turn.¹⁵ As a side note, the word “citizen” itself dates back to Ancient Greece. As Rogers Smith explains; “The word 'citizen' derives from the Latin *civis* or *civitas*, meaning a member of an ancient city-state, preeminently the Roman republic; but *civitas* was a Latin rendering of the Greek term *polites*, a member of a Greek polis [city-state].”¹⁶ As the example of the word “citizen” suggests, the ancient Romans were heavily influenced by the ancient Greeks in many ways, which included ideas about citizenship. And in turn, so much of Western way of thought has been influenced by the ancient Romans, which includes the way citizenship has been historically understood.¹⁷

The citizenship that functioned in ancient Greek and Roman societies is subject to a common misunderstanding. The misunderstanding revolves around the assumption that citizenship in these ancient societies was on the whole an “active” one, in contrast to what is deemed to be a generally “passive” one in modern societies.¹⁸ What is meant by “active citizenship” is that citizens are frequently (and mostly directly) involved in the day-to-day running of the political

¹⁵ David Burchell, “Ancient Citizenship and its Inheritors,” in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications, 2002), p. 89. Also see; Rogers M. Smith, “Modern Citizenship,” in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications, 2002), p. 106.

¹⁶ R. Smith, “Modern Citizenship”, p. 106.

¹⁷ *Ibid.* p. 106.

¹⁸ Burchell, “Ancient Citizenship...,” pp. 89-90.

affairs of their society. In contrast, “passive citizenship” means that citizens are infrequently involved in the political process. Even when they do get involved, it is through “an elaborate system of political representation at a distance, carried out in the shadow of a permanent professional administrative apparatus.”¹⁹

Contrary to the common misunderstanding, however, elements of both active and passive citizenship existed in the two ancient societies.²⁰ As such, passive citizenship did not originate in modern societies; it existed right from the beginning along with active citizenship.

Focusing on the example of Athens, active citizenship played a very important role in the functioning of ancient Greek city-states.²¹ Ancient Athens was run by an assembly and a representative council. The assembly made the fundamental decisions while the representative council made the day-to-day decisions concerning foreign affairs and civic defense. Both the assembly and the representative council were composed of the citizens of Athens. Quoting the words of J.S. Morrison, A.W. Gouldner indicates that the attitude amongst ancient Greeks was; “no one [is] better qualified than anyone else by breeding, intellectual power, or specific training to direct public policy”.²² Furthermore, highlighting the spirit of active citizenship, citizens considered Athens to be nothing more than the community of citizens themselves. Athens as a city-state

¹⁹ Burchell, “Ancient Citizenship...,” p. 89.

²⁰ *Ibid.* pp. 90, 102.

²¹ A.W. Gouldner, “The War Between the Cities,” in *Citizenship: Critical Concepts – Volume I*, ed., Bryan Turner and Peter Hamilton (London: Routledge, 1994), pp. 332-333.

²² Gouldner, “War Between the Cities,” p. 332.

was not detached from the citizenry; it was directly a reflection of the citizenry.

Despite all of this, however, active citizenship in Athens was for certain males only.²³ Women and slaves were excluded from decision-making. Athens was a community of *male* citizens. Furthermore, many male citizens were unable to attend the assembly meetings due either to being in war or being unable to leave their farms unattended. As such, usually only townsmen were able to partake in active citizenship. Furthermore, many citizens were faced with the problem of making a living; if they concentrated on earning an income they did not have the time to attend the assembly meetings, and if they concentrated on attending the assembly meetings they lacked the proper time to earn their income. It was for this reason that Athens eventually created a system by which citizens could be compensated for dedicating themselves to public affairs.²⁴ Contrary to the common misunderstanding then, citizenship in ancient Greece was not on the whole an active one; passive citizenship always existed alongside active citizenship.

The divide between active and passive citizens became more pronounced in ancient Rome. In ancient Rome, only a small number of citizens were allowed to influence the running of their city. These were the active and public citizens, the *dignitas*, who had the chance to lobby for their interest, and stake political

²³ Gouldner, "War Between the Cities," pp. 332-333.

²⁴ *Ibid.* p. 335.

power.²⁵ They focused their time on “self-projection, self-assertion and self-display”, all in the pursuit of “power and glory, position and prestige”. The *dignitas*, were an exclusive section of the citizenry; only males from privileged sections of society were eligible to become *dignitas*. Opposite the *dignitas* were the *privatus*, the private and passive citizens, who were comprised of the remaining males of society.²⁶ As is evident, women were completely excluded from partaking in citizenship. The *privatus* were expected to keep themselves, abide by the rules, strive for peace and stability, and respect their fellow citizens. They had the right to be protected by the extra-legal actions of their fellow citizens, but they lacked the access to the political power the *dignitas* had. Ancient Roman society had established roles for both citizen groups, who were by the role given to them unequal in status. Just as in the case of ancient Greece, passive citizenship existed alongside active citizenship in ancient Rome during its existence as a republic.

Fitting of the evolving nature of citizenship, ancient Roman conception of citizenship changed over time.²⁷ As ancient Rome transformed from a republic to an empire, active citizenship became more and more meaningless as the status of the Roman emperors rose in prominence. Citizenship over time became on the whole a passive one, a legal bond a Roman possessed in relation to the Empire.

²⁵ Burchell, “Ancient Citizenship...,” p. 95. Also see; Bryan S. Turner, “Outline of a Theory of Citizenship,” in *Citizenship: Critical Concepts – Volume I*, ed., Bryan Turner and Peter Hamilton (London: Routledge, 1994), p. 211.

²⁶ Burchell, “Ancient Citizenship...,” pp. 95-96. Also see; Turner, “Outline of a Theory of Citizenship,” p. 211.

²⁷ Burchell, “Ancient Citizenship...,” pp. 97-99. Also see; R. Smith, “Modern Citizenship,” p. 106.

The *dignitas* lost their position in society, and public offices dedicated to the empire were opened, giving opportunity to wider sections of society to hold office. While this was disastrous for the *dignitas*, it was beneficial for the *privatus* who previously had no chance to partake in political affairs. Contrary to the common misunderstanding then, active citizenship became non-existent in Rome after it transformed into an empire.

Bryan Turner and Rogers Smith offer different accounts of the way citizenship has evolved in the modern era. Turner holds the position that active citizenship continued to play a role in citizenship in the modern era. According to him citizenship in modern era, just as it was in the ancient era, cannot be easily classified as being simply a passive or an active one.²⁸ Turner indicates that active citizenship was a critical part of political life in the Italian city-states during Renaissance, in post-1789 Revolution France, and in the establishment of the United States of America independent of British rule. Pre-World War I Britain witnessed the influence of both active and passive citizenship. In Germany, citizenship has historically developed along passive lines. These are all specific examples within the political history of the western world, examples Turner use to demonstrate that citizenship in the modern era cannot simply classified as either active or passive.

Within this historical context, Turner sees active citizenship as a bottom-up

²⁸ Turner, "Outline of a Theory of Citizenship," pp. 216-218.

phenomenon and passive citizenship as a top-down phenomenon.²⁹ Citizenship took on an active character when the citizens (the bottom) demanded from their state (the top) the right to wield political power, and waged a revolutionary struggle when their demands were not met. Citizenship took on a passive character when the state deemed itself as the main source of political authority, and citizens either became politically weak subjects or the mere recipients of services offered by the state to its citizens.

Rogers Smith holds the position that in the modern era citizenship has become a predominantly passive phenomenon. A citizen is still regarded as someone who can rule and be ruled in turn, or as Smith puts it, “a citizen [is] a person with political rights to participate in processes of popular self-governance.”³⁰ However, the way in which the citizen partakes in the politics of society has changed. It has become an indirect and passive mechanism. Citizens are usually able to enjoy self-governance only through a mechanism of electing representatives who are supposed to defend the citizens' interests in the state assemblies.³¹ This has to do with the fact that modern states, unlike the ancient city-states of Greece for example, are simply too large and populous to be ruled by citizen assemblies. The size and population of modern states have made citizen assemblies an impractical tool for popular self-governance. As such the small-scale popularly-governed city-states of ancient times have left in their places

²⁹ Turner, “Outline of a Theory of Citizenship,” pp. 209-210.

³⁰ R. Smith, “Modern Citizenship,” pp. 105.

³¹ *Ibid.* pp. 107-108.

large-scale states operating on a system of popularly-elected representation. And this transformation has mostly eradicated active citizenship. In these times for most people, citizenship no longer involves being actively involved in the political process of society.³² For most people, in terms of participation, citizenship is about electing representatives who will take care of politics on the citizen's behalf.

Moving beyond the contention over citizens' participation in political matters, citizenship in the modern era primarily revolves around sovereign large-scale states, and more specifically nation-states.³³ Citizenship is primarily understood as something that exists based on a person's bond to a nation-state. In fact, in modern times citizenship is commonly understood to be the equivalent of possessing a nationality tied to a certain state.³⁴ Citizenship as a term has become closely related to nationality. As such, to get a better understanding of citizenship, the term "nation" (and related terms such as nationalism) will be elaborated below.

In the modern era, citizenship issues mostly have to do with the practices of nation-states, and laws regarding citizenship are enacted at the level of nation-states. Yet global trends manifesting themselves in the recent decades such as globalization and post-modernization, and the events triggered at the end of the Cold War have started to change the way in which citizenship is to be understood.

³² R. Smith, "Modern Citizenship," p. 108.

³³ Turner, "Outline of a Theory of Citizenship," pp. 4-5.

³⁴ R. Smith, "Modern Citizenship," p. 105.

Fitting of the evolving nature of citizenship, citizenship is now coming to be understood as something that is not solely confined to the state level, but something that is connected to the regional and transnational level. In fact, the term “citizen” is now popularly used to designate a person belonging to any kind of human association.³⁵ Being a citizen is no longer simply about being a member of state, it is has now come to mean much more than that.

As such, while citizenship may still be predominantly a matter for nation-states, the nation-state is no longer the only focus of citizenship. Citizenship is now something that is discussed at a variety of levels, and is being shaped by the dynamic relationship between regions, states, and global society. As a term that is inherently evolving in its nature, citizenship will continue to take on new meanings and begin to exist in new contexts in the upcoming times.

1.2.3. The Definition of Citizenship

Now that the complex and evolving nature of citizenship has been elaborated upon, it is time to use a more detailed definition of citizenship.

Thomas Janoski and Brian Gran have provided their readers with such a definition: citizenship is the “passive and active membership of individuals in a nation-state with universalistic rights and obligations at a specified level of

³⁵ R. Smith, “Modern Citizenship,” pp. 105-106.

equality.”³⁶ There are four main points to be elaborated in terms of Janoski's and Gran's definition:

The first point is about membership.³⁷ Citizenship is about establishing who, amongst the total number of individuals living in the territory controlled by a nation-state, is eligible to be a full member of the nation-state. A full member is considered a citizen, and is entitled to enjoy rights that are tied to citizenship. Membership is a concept that is exclusive in its nature, so certain groups of people have always ended up being excluded from the membership of a nation-state. The reason for this exclusion has usually revolved around a person's ethnic, gender and/or class background.

The second point is about the active and passive aspects of citizenship.³⁸ As Turner has indicated, citizenship can either be a bottom-up active phenomenon, or a top-down passive phenomenon. In passive citizenship, the citizen is a politically uninvolved subject who nevertheless enjoys the rights granted by one's status as a citizen. In active citizenship, the citizen is a direct participant in the political affairs of his/her society. How meaningful active citizenship is in any given society is based upon: 1) The ways in which citizens can participate, 2) the reasons why citizens participate, and 3) the consequences of citizenship participation.

³⁶ Thomas Janoski and Brian Gran, “Political Citizenship: Foundations of Rights,” in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications, 2002), p. 13

³⁷ Janoski and Gran, “Political Citizenship...,” p. 13.

³⁸ *Ibid.* pp. 13-14. Also see; Turner, “Outline of a Theory of Citizenship,” pp. 209-210.

The third point is about universal nature of citizenship rights.³⁹ Citizenship rights are put in place through a legal framework, and apply to all citizens. Informal or special rights do not constitute proper citizenship rights. In order for there to be proper citizenship rights, such rights must be formal and as applicable (in terms of the general population) as possible.

The fourth point is about equality.⁴⁰ Citizenship must, to a certain extent, guarantee equal rights and obligations amongst the citizens. This equality does not necessarily have to be an absolute one, but it must at the least bring ordinary citizens to a similar level with the citizens who are more socially-privileged. This usually entails legal equality in which all citizens can for example access public courts, or enter the legislature or the bureaucracy. The notion of equality, however, can be taken a step further. By providing guaranteed payments and services in the form of social welfare programs, citizenship can entail some measure of equality in the economic and social spheres.

After having mentioned the term “rights” repeatedly within the scope of citizenship, it will be proper to elaborate on what kind of rights there can be under citizenship. Janoski and Gran have provided in their article a very useful chart that details the theoretical range of citizenship rights.⁴¹ The authors have identified four main categories of citizenship rights: legal (civil), political, social, and

³⁹ Janoski and Gran, “Political Citizenship...,” p. 14.

⁴⁰ *Ibid.* p. 14.

⁴¹ *Ibid.* p. 15.

participation rights. The authors indicate that legal and political rights are what allow individuals to create the laws that establish citizenship rights in general. As such, legal and political rights are foundational, and their existence guarantees the existences of the other two categories of citizenship rights (social and participation rights).

The citizenship rights detailed by Janoski and Gran form the theoretical range of citizenship rights, as in a certain portion of these citizenship rights may not exist in certain nation-states. The four main categories of citizenship rights theoretically grant the following rights to citizens:

Legal rights encompass personal security, access to justice system and due-process, and freedom of conscience and choice. Personal security includes: protection from illegal disappearances, torture, capital punishment, protection of personal privacy, and the right to control one's body. Access to justice system and due-process includes: access to legal representation, being eligible for free legal aid or to have legal fees waived due to low income, the right to confront witnesses and to be tried by jury, and the right to contract. Freedom of conscience and choice includes: freedom of speech, of the press, of religion; freedom to serve in the military, freedom to choose occupation, and freedom to choose gender/ethnic identity.

Political rights encompass personal rights, organization rights, and membership rights. Personal rights include: the right to vote, to stand for office, to

protest; and freedom of information. Organization rights include: the right to form political parties, trade/economic unions, social movements/oppositions; the right to assemble and protest as a group, and cultural/minority rights. Membership rights include: immigration and residency rights, naturalization rights, asylum rights, and cultural rights.

Social rights encompass enabling rights, opportunity rights, and redistributive and compensatory rights. Enabling rights include: being eligible to receive health care, old-age pensions, rehabilitation, and family counseling. Opportunity rights include: the right to receive pre-primary, primary, secondary, and higher education; and the right to receive educational counseling. Redistributive and compensatory rights include: being eligible to receive war-injury and work-injury benefits, being eligible to receive financial assistance in case of low income or unemployment, and the right to be compensated for rights violations.

Participation rights entail labor market rights, advisory/determinative rights, and capital control rights. Labor market rights include: access to labor market information, the right to receive assistance in terms of job creation, placement, and security; and protection from discrimination. Advisory/determinative rights include: works councils/grievances, the right to engage in collective bargaining, the right of co-determination (human resource

decisions),⁴² and ethnic/indigenous councils. Capital control rights include: wage earner funds, central bank controls, regional investment decisions, anti-trust and capital escape laws, and the right of co-determination (strategy decisions).⁴³

Another useful categorization of citizenship rights is provided by Wesley Hohfeld. Hohfeld categorizes citizenship rights in terms of their implications.⁴⁴ According to Hohfeld, the four categories of citizenship rights are: liberties, claims, powers, and immunities.

Liberties are rights that allow individuals to act as they please so long as these actions do not hurt other individuals. For example, individuals have the right of free speech so long as their speech does not endanger other individuals' well-being.

Claims are rights that allow individuals to demand goods and services. Claims require the cooperative action of other individuals. For example, people must pay taxes in order for unemployed people to claim unemployment compensations.

Powers are rights that allow individuals to cooperatively control other individuals or properties. For example, workers must cooperate in order to do

⁴² This means that employees have the right to influence their company's decisions relating to the management of company employees.

⁴³ This means that employees have the right to influence their company's economic decisions in the free market.

⁴⁴ Janoski and Gran, "Political Citizenship..." pp. 16-17.

collective bargaining with their employers, and the decisions reached through this collective bargaining will be binding upon all the workers.

Immunities are rights that allow individuals to be exempted from claims and powers. For example, individuals drafted to the military in times of war are given priority when being hired and re-hired for jobs. In other words, they are made immune to other individuals' claim of being given equal treatment (when being hired), because war veterans must be compensated for the employment opportunities they lost during the wartime.

1.2.4. Theories Regarding Citizenship

In the literature regarding citizenship, there are certain solidified modes of thinking (or theories) regarding citizenship. Each theory of citizenship views and describes citizenship, and the rights and duties associated with it, in its own distinct way. There are four major theories regarding citizenship. These are: liberalism, republicanism, communitarianism, and radical pluralism.

Liberalism places the individual at the center of its notion of citizenship.⁴⁵ An individual must be allowed to enjoy his/her liberty free from outside interference. Liberalism emphasizes negative liberty;⁴⁶ which is about the right to

⁴⁵ Peter H. Shuck, "Liberal Citizenship," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications, 2002), pp. 132, 134.

⁴⁶ There is also another type of liberty; which is positive liberty. Positive liberty is about the right to be provided with the means to live an independent and dignified life. This is achieved by receiving education and health care, and by having the opportunity to earn an income.

be left alone and to be free to do as one wishes. The individual should be able to enjoy the freedom of thought, inquiry, worship, and expression. The individual should also be free to own property, use that property as one wishes. The state plays a role in maintaining liberty. By leaving the individual alone to do as s/he wishes, and by protecting the individual from other people's interference, the state allows the individual to enjoy negative liberty.

Despite state's role in maintaining liberty, however; liberalism views the individual and the state to be inevitably at odds.⁴⁷ According to liberalism, the rise in state power will inevitably erode the power of the individual. As such, state power should always be kept in check by civil society, and be limited to essential things such as law enforcement and public services. According to liberalism, an individual's actions that do not affect other people are entirely the business of the individual, and the state must have a solid justification for interfering with an individual's actions.⁴⁸ Furthermore, according to John Locke, a state that arbitrarily infringes upon individuals' liberty goes against its reason for existence.⁴⁹ This is because the state exists for the sole purpose helping individuals maintain their liberty. According to Locke, people have the natural right dismantle a state that no longer serves its intended purpose.

Although liberalism has in recent times begun to pay more attention to positive liberty, it has traditionally placed much more emphasis on negative liberty. Positive liberty has historically been associated more with republicanism. For a discussion on negative and positive liberty, please see; Shuck, "Liberal Citizenship," pp. 132-134.

⁴⁷ *Ibid.* pp. 134, 136.

⁴⁸ *Ibid.* p. 134.

⁴⁹ C. B. Macpherson, editor's introduction to *Second Treatise of Government*, by John Locke (Cambridge: Hackett Publishing Company, 1980), pp. xix-xx.

Republicanism places the responsibility to engage in public affairs at the center of its notion of citizenship.⁵⁰ According to Jean-Jacques Rousseau, people establish states for the purpose of promoting a common good that will serve the interests of all. A social contract is subsequently formed between the state and its citizens.⁵¹ The citizens entrust political power to the state so that the state can promote the common good. The decisions of the state must reflect the general will of its citizens, for state decisions can only promote the common good by paying attention to what its citizens want. The citizens in turn must show solidarity with the *body politic*⁵² by engaging in the public affairs. This involves being politically active, and defending the rule of law and the right of people to rule themselves.⁵³ Showing solidarity is also about fulfilling one's responsibilities towards society: respecting other people's rights, obeying the law, paying taxes etc.⁵⁴ By being politically active, citizens keep the state in check and prevent it from drifting away from the general will. By fulfilling their responsibilities, citizens make a contribution to society the way society has contributed to them.

Republicanism is very much concerned with idea of “civic virtue”.⁵⁵ Civic virtue is about being a proper citizen; meaning a citizen who is committed to the idea that there is much more at stake than the individual, that each individual by

⁵⁰ Richard Dagger, “Republican Citizenship,” in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications, 2002), pp. 146.

⁵¹ Jean-Jacques Rousseau, *On the Social Contract*, trans., Donald A. Cress (Cambridge: Hackett Publishing Company, 1987), pp. 24, 33-34.

⁵² Rousseau uses this term to denote the political society that comes into being from the union of all citizens. For reference, please see; Rousseau, *Social Contract*, 24.

⁵³ Dagger, “Republican Citizenship,” pp. 147-148.

⁵⁴ *Ibid.* p. 150.

⁵⁵ *Ibid.* pp. 148-150.

being a citizen has duty to engage in public affairs. According to republicanism then, citizenship is not merely a status; it is a way of life. Within this context, republicanism emphasizes positive liberty, since it is much easier for an individual to engage in public affairs when s/he is properly educated, healthy, and financially secure.

Communitarianism places the idea of the community at the center of its notion of citizenship.⁵⁶ According to communitarianism, the community is a cultural and moral formation that predates any kind of political formation, state, and society. Being a citizen is about being a part of a community, sharing a unity with fellow citizens who are part of the same community, and about carrying the ideals of that community.⁵⁷ Communitarianism rejects the individualism of liberalism, and does not place the kind of importance on involvement in public affairs that republicanism does.⁵⁸ As a theory that has grown out of republicanism, communitarianism acknowledges the importance being engaged in public affairs. It goes beyond republicanism, however, by emphasizing the importance of preserving of the identity that comes from being part of a community. And this emphasis on the community means that communitarianism is much more particularistic (vs. republicanism for example) about what a citizen should be; for what a citizen should be will be determined by which community an individual is

⁵⁶ Gerard Delanty, "Communitarianism and Citizenship," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications, 2002), p. 159.

⁵⁷ Delanty, "Communitarianism and Citizenship," pp. 159, 160-162.

⁵⁸ *Ibid.* pp. 162-163.

part of.⁵⁹

One final thing to point out about communitarianism is that it has taken on new meanings with the process of globalization. Increased global communication has allowed for the creation of cyber communities that make up the “global village.”⁶⁰ As such, communities are no longer necessarily geographically confined formations, for they may be formations that are constituted of geographically distant individuals who are connected to each other via various communication technologies.

Radical pluralism places social struggle at the center of its notion of citizenship.⁶¹ Citizenship isn't simply an identity, or a status gained by being part of any state or community. Citizenship is to be understood as a form of activity, it is about being prepared to constantly struggle for a pluralistic and democratic way of life that seeks to promote the rights of various groups of people.⁶² Radical pluralism is radical in that sense that it maintains that everything in society is contestable, that there is no fixed truth, and that any topic is potentially political (as in related to the distribution of power).⁶³

Notions of what is political and what is not, or what is contestable and

⁵⁹ Delanty, “Communitarianism and Citizenship,” p. 163.

⁶⁰ *Ibid.* p. 164.

⁶¹ Claire Rasmussen and Michael Brown, “Radical Democratic Citizenship: Amidst Political Theory and Geography,” in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications, 2002), pp. 175-176.

⁶² Rasmussen and Brown, “Radical Democratic Citizenship...,” p. 178.

⁶³ *Ibid.* pp. 176-179.

what is not are simply manifestations of the existing power structures within a state or society.⁶⁴ And such power structures inevitably exclude certain groups from power. According to radical pluralism, being a citizen is about resisting and challenging such existing power structures that exclude groups of people. According to radical pluralism then, citizenship is about defending an inclusive democracy that always challenges itself, and one that always attempts come up with venues to de-marginalize the marginalized groups of society.⁶⁵

1.3. NATIONALISM

In present day, the international system is dominated by nation-states. In such circumstances, to be a citizen is to be a member of a particular nation-state. Since the nation-state in the most classical sense is the political embodiment of one nation, to be a citizen of a nation-state implies that the citizen is also a member of that nation.⁶⁶ Within this context, a person who is not considered to be a member of that nation cannot be considered be a member of the nation-state, and thus cannot be considered to be a citizen.

The Baltic case serves as an example for this: based on historical experience Lithuanians did not come to see the Russian minority living amongst them to be a threat. Estonians and Latvians, based on their historical experiences,

⁶⁴ Rasmussen and Brown, "Radical Democratic Citizenship...", pp. 177-179.

⁶⁵ *Ibid.* pp. 175-176, 178.

⁶⁶ William Rogers Brubaker, "Immigration, Citizenship, and the Nation-State in France and Germany: A Comparative Historical Analysis," in *Citizenship: Critical Concepts – Volume II*, ed., Bryan Turner and Peter Hamilton (London: Routledge, 1994), pp. 311-312.

came to see the Russian minority as a threat.⁶⁷ The Lithuanians as such had no reservations about welcoming the Russian minority into the Lithuanian nation, and thus allowed this minority group to acquire citizenship. Estonians and Latvians, however, did not want to welcome the Russian minority into the Estonian and Latvian nations, and thus made it difficult for this minority group to acquire citizenship. In essence, Lithuanians developed a sense of nationhood based on civic values; a nationhood open to all those willing to be a part of the nation. Estonians and Latvians developed a sense of nationhood based on ethnic values; a nationhood restricted to those who were related to each other only through lineage.

As exemplified by the Baltic case, citizenship as a term is closely related with the nation-state, and thus also related to terms such as the nation and nationalism; which is a highly influential ideology concerning the nation and the nation-state. It is therefore necessary to elaborate on what nationalism is in order to shed more light on what citizenship is.

1.3.1 Definition of Nationalism

Anthony Smith provides definitions for both nations and nationalism, which will serve well as a starting point for our purpose of covering the topic of nationalism. Smith defines a nation as; “a named human community occupying a homeland, and having common myths and a shared history, a common public

⁶⁷ The historical experiences of the Baltic people will be elaborated on in the next chapter.

culture, a single economy and common rights and duties for all members.”⁶⁸ As for nationalism, it is; “an ideological movement for the attainment and maintenance of autonomy, unity, and identity for a population which some of its members deem to constitute an actual or potential 'nation’”.⁶⁹

Nationalism exerts a powerful influence upon people who identify themselves as a nation. What this means is that people not only strive to preserve their nation, they also begin to seek autonomy for their nation. Autonomy is most clearly achieved through the establishment of a state.⁷⁰ It is for this reason that nationalism creates a strong pull towards the creation of nation-states: formations in which there is “just one nation in a given state and one state for a given nation.”⁷¹ It was through such a process that the Baltic people achieved independence. After having identified themselves as nations, Estonians, Latvians, and Lithuanians sought to break free of Czarist Russia's control and establish independent states. Similarly, they broke free of Soviet Union's control in order to reclaim their independence.⁷²

1.3.2. Theories Regarding Nationalism

Ernest Gellner and Benedict Anderson offer two different narratives on the

⁶⁸ Anthony D. Smith, *Nationalism: Theory, Ideology, History*, (Cambridge: Polity Press, 2005), p. 13.

⁶⁹ A. Smith, *Nationalism: Theory, Ideology, History*, p. 9.

⁷⁰ A. Smith defines a state as “a set of autonomous institutions ... possessing a legitimate monopoly of coercion and extraction in a given territory.” For reference, please see; *Ibid.* p. 12.

⁷¹ *Ibid.* p. 17.

⁷² The history of the Baltic states will be covered in detail in the next chapter.

formation of nations, and on the nature of nationalism.

Ernest Gellner's book *Nations and Nationalism* is one of the key sources in the nationalism literature. According to Gellner, nationalism is a political ideology that advocates the idea that the state and the nation must overlap with each other.⁷³ A state must, ideally speaking, contain within its borders all of the members of a certain nation. At the same time, the state must be run by the members of the nation that is being ruled by the state. If the state does not satisfy these two conditions, it is violating the idea of nationalism. And a state that is violating the idea of nationalism will anger a nation with nationalistic aspirations.

The state is the centralized authority that possesses the right to use legitimate violence over the population within the territory it controls. Gellner, however, considers this basic definition of the state to be incomplete in the context of the modern world.⁷⁴ He indicates that the state, besides being the wielder of legitimate violence, is also an entity that maintains and perpetuates the dominant culture within its territory. The idea of the nation is tied to this notion.⁷⁵ According to Gellner, a nation is a group of people with a shared culture who identify each other as belonging to the same group, and possess the will to continue their group and its culture. This culture, however, is classified as a “high” culture, a culture created by literate, educated individuals who are capable to specializing in various

⁷³ Ernest Gellner, *Nations and Nationalism*, (Ithaca: Cornell University Press, 1983), pp. 1-2.

⁷⁴ Gellner, *Nations and Nationalism*, pp. 3-5, 140-141.

⁷⁵ *Ibid.* pp. 5-7, 140-142.

fields according to what is economically necessary. This high culture specifically evolved to function within the economy of modern industrial states.

According to Gellner, nationalism is a modern phenomenon that came into being with the industrial age. The economic and social conditions that came into being during the industrial age induced people to come up with the idea of nationalism.⁷⁶ According to Gellner, it was the idea of nationalism that forged nations, and not the other way around.⁷⁷ The idea of nationalism turned various groups of people with various religious and linguistic affiliations into nations that were only affiliated with themselves. According to Gellner, nationalism homogenized the landscape of groups,⁷⁸ by inducing people to consciously focus their affiliations into one specific group (the nation), and by inducing them to maintain a culture that would set their nation apart from other nations. In the modern world, according to Gellner, the nation has become the natural grouping mechanism of people. And in the modern world, nations need states of their own to protect and perpetuate themselves.⁷⁹

Benedict Anderson's *Imagined Communities* constitutes another important text in the literature of nationalism. According to Anderson, a nation is an “imagined political community” that is considered by its members to be both sovereign and

⁷⁶ Gellner, *Nations and Nationalism*, pp. 58-62.

⁷⁷ *Ibid.* pp. 55-56.

⁷⁸ *Ibid.* pp. 139-140.

⁷⁹ *Ibid.* pp. 142-143

limited in its nature.⁸⁰ A nation is an imagined community because most of the members of this community will never get to know each other face-to-face. Nevertheless, the members of the community imagine that they have a bond with other members of the community. Unlike Gellner who indicated that groups of people (communities) objectively existed prior to being nations, Anderson indicates that all communities throughout history have been the product of people's imaginations. The only possible exception to this would have been ancient tiny communities in which everyone had closely known each other. As such, according Anderson, nationalism is simply a new way of imagining communities.⁸¹

Nationalism, as a way of imagining communities, brings with it three assumptions.⁸² One assumption is that a nation is limited in its nature, because no matter how populous a nation might be, there will be people who will not be a part of that nation. No nation considers itself to encompass the whole of humanity. Another assumption is that a nation is a sovereign entity. In the modern age in which religion and monarchic rule has lost its significance, it is only the nation that can claim to be sovereign over people. And it is the state that is considered to be what maintains that sovereignty and ensures the freedom of the nation. The last assumption is that a nation is constituted of a “horizontal comradeship”. No matter how much inequality and exploitation there may exist within a nation,

⁸⁰ Benedict Anderson, *Imagined Communities*, (London: Verso, 2006), p. 6.

⁸¹ Anderson, *Imagined Communities*, p. 6.

⁸² *Ibid.* p. 7.

members of the nation still consider themselves to be fraternally bonded.

According to Anderson, nationalism as a way of imagining communities rose after religion and monarchic rule began to lose importance as a method of organizing people into groups.⁸³ Anderson indicates that religion and monarchic rule were, much like nationalism, ways of imagining communities. But the increasing prominence of scientific reasoning and the loss of the legitimacy of the “divinely selected” monarchs undermined religion and monarchic rule as a valid way of imagining communities. Within historical context, nationalism rose as a new way for people to imagine communities. And what facilitated the rise of this new way of imagining was the invention of the printing-press.⁸⁴ The printing press, combined the rise of capitalist economy, allowed for the printing of countless books and newspapers that allowed for people across Europe to communicate with each other. Beyond communication, it made people realize the existence of people like themselves in distant places who spoke the same language and who had similar aspirations. Printing press allowed for the rise of prominent dialects of languages across Europe, and allowed people who spoke the same language to communicate in a more uniform manner. As such, the printing press allowed to the rise of a new consciousness among people with similar cultures, which eventually led to the rise of nationalism.

⁸³ Anderson, *Imagined Communities*, pp. 11-12, 36.

⁸⁴ *Ibid.* pp. 36, 46.

1.3.3. Nationalism's Relationship with Different Democracy Models

During Soviet rule, a large number of Russian speaking people (the Russian minority) were brought into the Baltic region. After regaining their independence Estonians, Latvians, and Lithuanians were faced task of deciding what to do the Russian minority, whom they regarded as a forcefully introduced foreign element. Ethnic⁸⁵ Estonians, Latvians, and Lithuanians were naturally a part of the Estonian, Latvian, and Lithuanian nations. The Russian minority was an ethnic group that did not naturally belong to these nations.⁸⁶ After regaining their independence, Estonians, Latvians, and Lithuanians would have to either accept or reject the Russian minority as part of their nations. Due to reasons that will be outlined in the next chapter, Lithuanians chose to accept the Russian minority, while Estonians and Latvians rejected it. It is within this context that different democracy models come into play.

Democracy models may either incorporate or keep out certain ethnic groups within a nation-state. Within this context, liberal democracy represents an inclusive response to ethnic groups, while ethnic democracy represents an exclusive response. A liberal democracy views the citizenry as the cornerstone of the state.⁸⁷ It makes no distinction between the majority and minority groups, and

⁸⁵ A. Smith indicates that ethnic groups bear similarities to nations, but are less organized than nations and don't aspire for autonomy. They also lack the political symbols, public culture, and clear sense of homeland that nations possess. For reference, please see; A. Smith, *Nationalism: Theory, Ideology, History*, pp. 12, 14.

⁸⁶ The Russian minority was not present when Estonians, Latvians, and Lithuanians transformed into nations in the 19th century. The next chapter will elaborate more on this issue.

⁸⁷ Sammy Smooha, "Types of democracy and modes of conflict management in ethnically

treats them equally. It also makes the acquisition of citizenship a process that is accessible to all regardless of their ethnic background. Through equal treatment and accessible naturalization process liberal democracy behaves inclusive towards minority groups, and allows them to become full participants within this democracy. Lithuania adopted this democracy model by behaving in an inclusive manner towards the Russian minority. As such, the Russian minority was accepted into the Lithuanian nation and was able to fully participate within Lithuania's democracy.

Ethnic democracy is a model Sammy Smooha originally developed for the case of Israel. He indicates that a number of other states besides Israel fit into this model as well, including Estonia and Latvia.⁸⁸ An ethnic democracy views the ethnic nation as the corner stone of the state.⁸⁹ It “extends individual and collective rights to the minority but also controls the state and appropriates power and privilege” for the majority.⁹⁰ It also makes the acquisition of citizenship an inaccessible process by placing conditions that discriminate against the ethnicity of the minority group. This democracy institutionalizes the dominance of the majority and excludes the minority by denying the chance to acquire citizenship.

divided societies,” *Nations and Nationalism*, 8, 4, (2002): pp. 423-431, pp. 424-425. Also see; Anton Steen, “Accessioning Liberal Compliance? Baltic Elites and Ethnic Politics under New International Conditions,” *International Journal on Minority and Group Rights*, 13, 2-3, (2006): pp. 187-207, pp. 187, 189.

⁸⁸ Sammy Smooha, “The model of ethnic democracy: Response to Danel,” *The Journal of Israeli History*, 28, 1, (2009): pp. 55-62, pp. 55, 57. Note: Smooha no longer considers Estonia and Latvia to be ethnic democracies. The reason why Estonia and Latvia can no longer be considered ethnic democracies will be elaborated in the next chapter.

⁸⁹ Smooha, “Types of democracy...,” p. 425.

⁹⁰ Smooha, “Model of ethnic democracy...,” p. 55.

Through such exclusion, the minority becomes incapable participating in the democratic mechanisms of the state. This was the initial democratic model Estonia and Latvia adopted. They excluded the Russian minority from citizenship, and thus excluded them from the Estonian and Latvian nations. Under Estonia's and Latvia's ethnic democracy, the Russian minority was incapable of participating in the democratic mechanisms of Estonia and Latvia.

Smooha indicates that states adopt ethnic democracy when the majority ethnic group wishes to establish a democracy but feel threatened by the presence of minority ethnic groups.⁹¹ By establishing an ethnic democracy, the majority is able to partake in democratic mechanisms while keeping minority out of politics and under the dominance of the majority. Estonia and Latvia were in this situation when they regained their independence after Soviet rule. They wished to democratize after the end of their communist regimes, but felt threatened by the large Russian minority living in Estonia and Latvia. They feared that the Russian minority would be able to influence Estonia and Latvia at the expense of Estonians and Latvians. Therefore, they established ethnic democracies to fulfill their goal of democratization and filtering the potential influence of the Russian minority. Lithuania, with a large ethnic population and a small Russian minority, did not feel threatened by the Russian minority. Therefore, Lithuanians felt no need to

⁹¹ Smooha, "Model of ethnic democracy...", p. 56.

establish an ethnic democracy.⁹²

Ethno-liberal democracy is a model Anton Steen developed for explaining the current form of democracy in Estonia and Latvia. Ethno-liberal democracy falls between liberal democracy and ethnic democracy in terms of inclusiveness. The hallmark of an ethno-liberal democracy is that “its citizenship law ... set thresholds for achieving citizenship status that are difficult to pass, but once this formal barrier has been surmounted a member of an ethnic minority is fully accepted as an equal by the indigenous people.”⁹³ An ethno-liberal democracy does not systematically exclude minority groups like ethnic democracy does. Ethno-liberal democracy, the majority is willing to behave in an inclusive manner on the condition that those aspiring for citizenship must assimilate and demonstrate loyalty to the state.⁹⁴ A prospective citizen must complete the difficult naturalization process in order demonstrate that s/he has been assimilated, and that s/he loyal to the state. Once this is done, s/he is considered trustworthy, and thus eligible for fully participating in the democratic mechanisms of the state.

Steen explains that ethno-liberal democracy was Estonia's and Latvia's response to domestic considerations and international pressure.⁹⁵ At one hand, Estonia and Latvia sought to ensure the dominant position of ethnic Estonians and Latvians within these two states. On the other hand, they wished to become EU

⁹² Estonia's, Latvia's, and Lithuania's reaction to the Russian minority will be elaborated in the next chapters.

⁹³ Steen, “Liberal Compliance...,” p. 189.

⁹⁴ *Ibid.* pp. 187, 189-190.

⁹⁵ *Ibid.* p. 205.

members, and the EU required them to be more inclusive towards the Russian minority. An ethno-liberal democracy was the answer to Estonia's and Latvia's two contradictory goals. By providing a mechanism for inclusion, an accessible but tough naturalization process, Estonia and Latvia's satisfied EU's demand. By maintaining a tough naturalization process and accepting only those who assimilated and demonstrated loyalty, Estonia and Latvia satisfied their goal of maintaining the dominant position of ethnic Estonians and Latvians.

Democracy models will be covered again in the third chapter in order better explain the process through which the three Baltic states enacted their citizenship policies once they regained their independence in 1990.

1.4. CONCLUSION

The purpose of this chapter has been to introduce to the reader the two important terms for this thesis: citizenship and nationalism. Citizenship is important because it a part of the question that this thesis seeks to answer: Do the citizenship policies of the Baltic states conform to the European Framework? A clear notion of citizenship is required before it is possible to properly assess the above question. Nationalism is important both because it was the driving force behind the Baltic states' independence, and also because it was an important factor in how the Baltic people perceived the Russian minority and how they chose to react to this minority group.

Citizenship is both a complex and an evolving term. It is complex because

its extent, content, and depth are open to interpretation. It evolves because its character has undergone change throughout time. In its current form, citizenship can be defined as “passive and active membership of individuals in a nation-state with universalistic rights and obligations at a specified level of equality.” Citizenship becomes active when the citizen actively participates in politics. Citizenship becomes passive when the citizen behaves as a mere subject receiving the services of the state. Citizenship is universal in the sense the state applies citizenship in the same way to all citizens. Citizenship is about equality in the sense that citizens possess the same rights and obligations. In terms of rights, citizenship encompasses a wide range of topics that are grouped into four categories: legal, political, social, and participation rights. The content of these rights represent the theoretical range of citizenship, since some states may not grant all the rights covered in these four categories.

The four theories regarding citizenship have different ideas concerning what is most important in citizenship. Liberalism holds that what is most important in citizenship is the individual. The individual must be allowed to pursue his/her liberty, and the state must promote liberty for the individual. Republicanism holds that what is most important in citizenship is engagement in public affairs. Citizens must practice proper citizenship by engaging in public affairs, and showing solidarity with their political community, while the state must work towards promoting the common good of all people. Communitarianism holds that what is most important in citizenship is the community. Citizens are part of a community, and the members of this community all share a common

identity. A citizen must be willing to preserve the identity that comes with being part of a community. There is no set rule for a citizen should be, as each community will have its own ideas about citizenship. Lastly, radical pluralism holds that what is most important in citizenship is social struggle. Citizenship must be seen as a form of activity in which the citizen is ready to challenge anything that stands in the way of a progressive, inclusive democracy. Attempts to portray something as a fixed truth may be a way to hide the power structures that impede progress. Therefore, a citizen must be prepared to question everything for the sake of progress.

Nationalism is an ideology that advocates the promotion and autonomy of nations. Nations are highly organized groups of people with a common history, culture, homeland, economy, and political symbols. Ernest Gellner maintains that groups of people with various affiliations always existed throughout history. According to Gellner, nationalism caused people to focus their affiliations into one single group. It was through this process that nations were born. Therefore nationalism is the reason why nations exist, and not the other way around. According to Benedict Anderson, all communities throughout history have been a product of people's imagination. In any community larger than a tiny village, most people will never get to know each other face-to-face. Members of a community nevertheless imagine that they share a bond with the members they may have never met. According to Anderson, nationalism is simply the modern way of imagining communities. Nationalism, as a way of imagining communities, has become the replacement of religion and monarchic rule that lost their

effectiveness in organizing people.

Nationalism exerts a powerful influence on those that identify themselves as nations. Once caught up in the ideology of nationalism, nations begin to actively strive for independence from foreign elements. The clearest way to achieve this is through the establishment of nation-states that will embody one single nation. Hence nationalism creates a trend towards to creation of nation-states. The history of the Baltic states provide an example towards this trend. Once Estonians, Latvians, and Lithuanians began to identify themselves as nations; they begin to resent foreign rule and sought independence. Through this process Estonia, Latvia, and Lithuania broke free from Czarist Russia and later on broke free from Soviet rule as well. As such, nationalism triggered a chain of events that resulted in modern day Estonia, Latvia, and Lithuania.

Nationalism has an important role in the way democracies are established. In the Baltic case, Estonians, Latvians, and Lithuanians perceived the Russian minority as a forcefully introduced foreign element that was not originally a part of their nations. The way they felt towards this foreign element had a determining effect on what kind of democracy they proceeded to establish. Lithuanians did not identify the Russian minority as a threat, and proceeded to democratize by adopting a liberal democracy model. This type of democracy is inclusive in its nature because it treats different ethnic groups as equals. Within this context the Russian minority were able to acquire citizenship and become a part of the Lithuanian nation.

Estonians and Latvians identified the Russian minority as a threat. They sought to democratize, but wished to filter out the influence of the Russian minority. Within this context, they established ethnic democracies. Ethnic democracy is exclusive in their nature, because it institutionalizes the majority's dominance at the expense of minority groups. In the ethnic democracies of Estonia and Latvia, the Russian minority was unable to acquire citizenship and was not allowed to become a part of the Estonian and Latvian nations.

As a way of balancing their desire to maintain the dominance of the majority and the membership conditions of the EU, Estonia and Latvia abandoned the ethnic democracy model and adopted the ethno-liberal democracy model. Ethno-liberal democracy falls between liberal and ethnic democracy in terms of inclusiveness. It is inclusive in so far as a member of the minority group is willing to assimilate and demonstrate loyalty to the state. In such a democracy, the majority still holds a dominant position, but members of minorities who prove themselves become eligible to fully participate in democratic mechanisms, and are accepted as part of Estonian and Latvian nations.

CHAPTER II:

THE HISTORY OF THE BALTIC STATES

2.1. INTRODUCTION

This chapter will give a brief account of the history of the Baltic states. This will provide background information about the Baltic states and will shed a light on the current developments about citizenship issues after 1990.

There are a number of reasons as to why Estonia, Latvia, and Lithuania are lumped together into the same category as the “Baltic states”. These reasons are: same geographical location in Europe, similar geographical features, and similar cultures. More importantly, the Baltic states have gone through similar historical events, which will be elaborated upon in this chapter.

At the same time, however, there are ways in which they are different from each other.⁹⁶ For example; Estonians are of Nordic descent, and are related to the Finns. Their language bears similarities with Finish and Hungarian, and therefore are set apart from Latvians and Lithuanians. Lithuanians and Latvians are among the oldest ethnic groups in Europe, and are the sole descendants of the ancient

⁹⁶ Steven Otfinoski, *Nations in Transition - The Baltic Republics*, (New York: Facts on File, 2004), pp. 3, 8, 31, 58, 60, 99, 131.

Balts. Despite being of different descent, for centuries Estonians and Latvians existed under the regional formation known as Livonia. Lithuanians, on the other hand, were able to form one of the largest state in Europe during the 14th century, and exercised control over a large part of eastern Europe. Additionally, there are also certain cultural variations between the three groups of people; an example being their level of religiosity.

2.2. ORIGINS OF ESTONIANS, LATVIANS, AND LITHUANIANS

As was previously indicated, Estonians are of a different descent than the Latvians and the Lithuanians.⁹⁷ The people who would eventually come to be known as the Estonians were originally Finno-Ugric tribes from northern Europe who settled in present-day Estonia around 3500 B.C. By 100 A.D., they had organized themselves into tiny states in the form of kingdoms. By 1000 A.D., these people had organized themselves into a loose federation of states.

Latvians and Lithuanians are the sole descendants of the Balts.⁹⁸ The Balts in turn came into being from the intermarriage of Indo-European tribes and the local tribes in the Baltics region. About 2500 B.C. Indo-European tribes migrated from Asia to Eastern Europe. By 2000 B.C., having been driven out by the Slavs, they settled into the Baltic region. There they intermarried with the local tribes and became the Balts. The Balts eventually separated into two groups, the

⁹⁷ Otfinoski, *Nations in Transition...*, p. 9.

⁹⁸ *Ibid.* pp. 59, 105.

Latvians Balts and the Lithuanian Balts. Latvian Balts further divided into smaller tribes and came to form small separate kingdoms. By the 12th century, there were four major kingdoms. The various tribes of the Lithuanian Balts, on the other hand, eventually came together to form one large tribe. By the 10th century, this tribe had transformed into the Lithuanian state run by a feudal system.

2.3. THE PERIOD FROM THE BALTIC CRUSADE TO THE FIRST WORLD WAR

2.3.1 The Baltic Crusade

By 12th century, Estonians, Latvians, and Lithuanians were amongst the few remaining pagan people in Europe. In order to convert these people to Christianity, the Papacy declared a Baltic Crusade in 1193. From this point onward the Baltic people would have to continually struggle with foreign elements who for various reasons sought to control the Baltic region. In this respect, the German crusaders known as the Knights of the Sword were the first of such foreign elements.

The Knights of the Sword overran Latvia and southern Estonia by 1218, and subdued Estonians and Latvians.⁹⁹ Meanwhile the Danes invaded northern Estonia. The Knights of the Order joined with other military groups to form the Teutonic Knights. In order to consolidate their power, the Teutonic Knights

⁹⁹ Otfinoski, *Nations in Transition...*, pp. 9-10, 59-60.

around the year 1260 joined Latvia and southern Estonia to create a new state called Livonia. The Danes would eventually sell northern Estonia to Order. For the next 270 years, Estonia and Latvia remained under the firm control of the Teutonic Knights.

Having subjugated Estonians and Latvians, Germans went on to establish themselves as the ruling class, seized lands once belonging to Estonians and Latvians, and made Estonians and Latvians work as their serfs. The feudal system set up by the Germans was in general similar to that in western Europe. Unlike western Europe, however, the system that existed in Livonia was colonial in nature¹⁰⁰ because Estonians and Latvians were being forced to serve foreign interests. Furthermore the Germans had a condescending attitude towards their subjects; they referred to their subjects as *Undeutsche* (non-Germans), barred them from working in urban professions, and put various other restrictions.

The Lithuanians did not suffer the same fate as the Estonians and the Latvians. More numerous, better organized, and protected by natural obstacles, the Lithuanians successfully fought back the Teutonic Knights, and remained free from their control.¹⁰¹ It was from this point onward that the Lithuanians would become the more influential group amongst the Baltic trio.

¹⁰⁰ Kevin O'Connor, *The History of the Baltic States*, (London: Greenwood Press, 2003), pp. 35-36.

¹⁰¹ Otfinoski, *Nations in Transition...*, pp. 105-106.

2.3.2. The End of Teutonic Knights' Rule

The rule of the Teutonic Knights in Livonia would come to end in 1558 when the Russians attacked Livonia, defeated the Teutonic Knights, took control of the Estonian part of Livonia.¹⁰² Meanwhile the Poles attacked Livonia as well, and took control of the Latvian part of Livonia. At this point, the Swedes intervened at the request of German landowners in Livonia, and drove out the Russians Estonia, and managed to drive the Poles from northern part of Latvia. The Swedes ruled Livonia politically, but the lands remained under the control of German landowners. Despite this, however, the Swedes introduced land and social reforms at the expense of the German landowners. As such, for the duration of Swedish control, Estonians and Latvians were able to live under better conditions.

The Russians attacked again in 1700, and defeated the Swedes by 1709. By 1721, the Russians assumed total control of Livonia once held by the Swedes. They abolished all the reforms made by the Swedes, giving power back to the German landowners.¹⁰³ During this time Russia was attempting to modernize itself, and as such sought the technical, military, and bureaucratic expertise of the Baltic Germans.¹⁰⁴ As such they granted a certain measure of autonomy to the

¹⁰² Otfinoski, *Nations in Transition*..., pp. 10-11, 60-61.

¹⁰³ *Ibid.* pp. 11, 61.

¹⁰⁴ O'Connor, *History of the Baltic States*, pp. 36, 38-39.

Germans to inspire loyalty, and the Germans did indeed remain as the loyal subjects of Russia. This Russian-German relationship meant that Estonians and Latvians were once again forced to endure hardship under their German landowners.

2.3.3. Lithuania's Rise to and Fall from Power

While Estonia and Latvia were being ruled by foreign elements, Lithuanians were busy expanding and consolidating their power in Europe.¹⁰⁵ Lithuanians began to expand their influence by working together with the Poles. When the Lithuanian monarch Jogaila married the daughter of king of Poland and Hungary, not only did he consolidate Lithuania's power, he also became the king of Poland. Jogaila appointed Vytautas as the regent of Lithuania, who took Lithuania to the peak of its power. Vytautas expanded Lithuania's territory east towards Moscow, and south towards the Black Sea. With the help of the Poles, he decisively defeated the Teutonic Knights in 1410, and helped establish Lithuania as one of Europe's largest and most powerful states.

Lithuania's power began to diminish after Vytautas' death.¹⁰⁶ Upon his death Lithuania was allied with Poland, but gained little from such an alliance. Polish culture gained influence at the expense of Lithuanian culture, while Latin and Polish replaced Lithuanian as choice of language in court affairs and daily

¹⁰⁵ Otfinoski, *Nations in Transition*..., pp. 107-108.

¹⁰⁶ *Ibid.* pp. 108-109.

interactions. A succession of weak monarchs and territory grabs by the Russians began to further diminish the power of Lithuania. The growing power of the Russians alarmed the Lithuanians, who turned to the Poles for help. The Poles agreed to help on the condition that the Lithuanians do a complete political merger with Poland. The creation of the Polish-Lithuanian Commonwealth did not alleviate the situation for Lithuania. Its culture and language were further undermined, and it continued to lose power as it waged war against the Swedes, the Turks, and the Russians. The fact that the Commonwealth specifically appointed weak foreign monarchs who were disinterested in local affairs only served to further weaken Lithuania.

By mid-18th century, the Commonwealth was in a state of collapse, and the Russians pressed on to grab more and more of Lithuania's territory. By 1795, the Russians had completely overrun Lithuania.¹⁰⁷ Meanwhile Poland had been partitioned by the Russians and other European powers. Lithuanians and Poles attempted resist Russian influence, and rebelled twice during the Russian reign, but were suppressed by the Russians. In an effort to control Lithuanians, the Russians began to employ a “russification” policy. This russification method employed by the Russians during the 19th century was a precursor to the method the Soviets would use in the 20th century, which will be elaborated later on in this chapter.

¹⁰⁷ Otfinoski, *Nations in Transition*..., p. 109.

2.3.4. Russian Rule and the First Instance of Russification

The russification policy employed by Russia during the Czarist period requires some explanation. Russia during the Czarist period was a vast and multi-ethnic empire. The ruling section of the empire was Russian, but they were aware of the impracticality of and the potential trouble that came with trying to impose Russian culture on the vast number of non-Russians living in the empire.¹⁰⁸ Anyone wishing to be part of the Russian state apparatus, however, was expected to be familiar with Russian culture and know how to speak Russian. As such, non-Russians who chose this path would in essence become russified.¹⁰⁹ But beyond this, Russia had no intention of culturally eliminating the various groups living within its borders.¹¹⁰ It did, however, regard any opposition movement by non-Russians as a threat to the integrity of the empire. This law enacted by Russia in 1906 demonstrated the Russian mentality during the Czarist period:

“The Russian State is one and indivisible. ... The Russian language is the common language of the State and is compulsory ... in all State and public institutions. The use of local languages and dialects in State

¹⁰⁸ Theodore R. Weeks, *Nation and State in Late Imperial Russia: Nationalism and Russification on the Western Frontier, 1863-1914*, (DeKalb: Northern Illinois University Press, 1996), pp. 12-13.

¹⁰⁹ Weeks, *Nation and State in Late Imperial Russia...*, pp. 12, 14.

¹¹⁰ *Ibid.* p. 69.

and public institutions is determined by special laws.”¹¹¹

During this time period Russia had no coherent and specific policy towards non-Russians. Russian policy towards non-Russians was at most reactionary and preventative in its scope.¹¹² Russia enacted “special laws” according to the circumstances at hand. Poles and Jews, for example, were perceived by Russia to be potentially dangerous groups, and as such faced many cultural and political restrictions. Lithuanians on the other hand, were generally seen as being a harmless group destined to eventually become assimilated by Russian culture.¹¹³ It was for this reason that only when the Lithuanians rebelled alongside the Poles did the Russians react harshly against the Lithuanians. As such, Russian action towards the Lithuanians during this period must not be judged as a sinister move, but as a natural consequence of Russia's drive to maintain a centralized and a unified empire.¹¹⁴ This is in contrast to the russification employed by the Soviets in the 20th century; which was much more ruthless and calculated in its character. This will be elaborated upon later in this chapter.

When Lithuanians rebelled against Russian rule, Russia predictably reacted by imposing restrictions on the expression of Lithuanian culture.¹¹⁵ Russians shut down schools teaching Lithuanian, and made Russian compulsory

¹¹¹ Weeks, *Nation and State in Late Imperial Russia...*, pp. 44.

¹¹² *Ibid.* pp. 5, 11, 14.

¹¹³ *Ibid.* pp. 46, 53.

¹¹⁴ O'Connor, *History of the Baltic States*, p. 53.

¹¹⁵ *Ibid.* p. 58. Also see; Otfinoski, *Nations in Transition...*, p. 109.

in elementary schools. They shut down Catholic monasteries and churches. They made Russian the official language in bureaucratic, administrative, and judicial affairs. They forbid the use of Latin letters when publishing books in Lithuanian, hoping that Lithuanians would start using the Cyrillic alphabet. Finally, they either imprisoned or executed anyone who was instigating opposition towards Russian rule.

Russian relationship with the Estonians and Latvians was of a different nature. Being much smaller, Estonians and Latvians posed no threat to the Russians, and thus Russians mostly left their loyal subjects the Germans in charge of ruling Estonians and Latvians. Things began to change by the end of the 19th century for two reasons:¹¹⁶ 1) Russia began to implement reforms and sought further centralization, and thus sought to bring Estonia and Latvia closer in line with Russian standards, 2) Russia began to feel uncomfortable with the cultural pull the Germans were having on Estonians and Latvians, especially after the German unification in 1871. Germany was now one of the most powerful states in Europe, Russians sought to prevent Estonians and Latvians drifting into rival Germany's orbit. Based on these two objectives the Russians enacted a number of changes.¹¹⁷ They brought the education and the justice system in Estonia and Latvia under direct Russian control. Like in Lithuania, they made Russian the official language in bureaucratic and administrative affairs. They also encouraged

¹¹⁶ O'Connor, *History of the Baltic States*, p. 53, 55.

¹¹⁷ *Ibid.* p. 54-56.

the growth of Orthodox Christianity and sought to undermine the influence of Protestant Christianity, but were unsuccessful in this regard.

In the end though, these russification measures imposed on Estonians, Latvians, and Lithuanians did not work;¹¹⁸ because Estonian, Latvian, and Lithuanian cultures were advanced enough by this point to prevent assimilation. Russian actions were only further encouraging Estonians, and Latvians, and Lithuanians to band together with their own groups, which enforced their sense of national identity.

A sense of nationhood had already begun to form in Estonia and Latvia by early 19th century. This formation process began first when Russians abolished serfdom in Estonia and Latvia by 1819. This move was partly based on the genuine desire to improve the living conditions of Estonians and Latvians, and but also on the desire to collect taxes from these now emancipated people instead of having to rely on the Baltic Germans.¹¹⁹ Russia then proceeded to implement land reforms, which allowed Estonians and Latvians to buy land and financially secure themselves. Having secured themselves, Estonians and Latvians now found the time to express themselves, which resulted in a dramatic increase in the creation of Estonian and Latvian literature, art, and music.¹²⁰ The first time Estonian and Latvian nationalism was made clearly apparent was when both Estonians and

¹¹⁸ O'Connor, *History of the Baltic States*, p. 39, 56.

¹¹⁹ *Ibid.* p. 41. Also see; Otfinoski, *Nations in Transition...*, p. 11.

¹²⁰ Otfinoski, *Nations in Transition...*, p. 11, 61-62.

Latvians held national song festivals which openly celebrated Estonian and Latvian culture. Lithuanians, on the other hand, lagged behind Estonians and Latvians in this respect;¹²¹ they were poorer and faced more restrictions, and thus didn't have the opportunity to express themselves like Estonians and Latvians.

Though feeling increasingly nationalistic, the Baltic people aspirations were not always the same. When nationalism first began to form amongst the Baltic people, it was against German cultural domination (for Estonians and Latvians), and against Polish cultural domination (for Lithuanians). None of the three groups of people had any intention of breaking away from Russia; they considered being part of Russia to be something permanent.¹²² This began to change in time, especially with the imposition of russification. While supporting Russian rule for having undermined Baltic Germans' power, Estonians and Latvians became increasingly uncomfortable with it the more they cultivated their sense of nationhood. Such sentiments eventually turned into political aspirations by the turn of the century as Estonians and Latvians first began to yearn for autonomy, which in turn turned into a yearning for independence.¹²³

With regards to nationalism, Lithuanians caught up with the Estonians and Latvians partly due russification.¹²⁴ As Polish cultural influence diminished due to

¹²¹ O'Connor, *History of the Baltic States*, pp. 46, 60.

¹²² *Ibid.* pp. 47-48, 51, 59.

¹²³ Charlotte Aston, *Antonius Piip, Zigfrids Meierovics and Augustinas Voldemaras: The Baltic States*, (London: Haus Publishing Ltd, 2010), p. 15.

¹²⁴ Aston, *Antonius Piip...*, pp. 20-22.

Russian crackdown, Lithuanians began to culturally express themselves in late 19th century just like Estonians and Latvians had done earlier. Moreover, the banning of the Lithuanian alphabet severely backfired. Highly religious people, Lithuanians viewed this ban as an attempt to curb their expression of Catholic Christianity (practiced using the Lithuanian alphabet) and an attempt push them towards Orthodox Christianity (practiced using the Cyrillic alphabet). Hostility towards the Poles began to be directed towards the Russians as well. What started as a religious reaction eventually turned into secular topics as well. In order to work around the alphabet ban, a large underground book printing and reading culture using the Lithuanian alphabet flourished. More and more Lithuanians began to read literature emphasizing Lithuanian culture. Unlike Estonia and Latvia, Lithuanian cultural expression quickly turned into a yearning for independence due to Lithuania's past as an independent and influential country. Having once been independent, Lithuanians were more galvanized by their predicament than Estonians and Latvians.

The year 1905 was a turning point for the Baltic people. In 1905 protests broke out throughout Russia in reaction to the failings of Tsarist rule. Estonians and Latvians too joined this protest, but the protest movement was brutally repressed by Russia. Meanwhile in the same year Lithuanians called for self-government, but Russia refused to grant it. Being tiny in comparison to Russia, the Baltic people did not have the means to forcefully break away from Russian rule. Circumstances needed to change in order for the Baltic people to achieve independence. The necessary change occurred during the First World War. During

the war, Russia became engulfed in the revolutionary events of 1917; which began when Russian people finally managed to overthrow Tsarist rule. Since internal power struggles in Russia were keeping Russian attention fixated on domestic affairs, Russia was not in a position to respond to events occurring elsewhere. The Baltic people took advantage of the situation, and by 1918, with Lithuanians taking the lead the Baltic people declared themselves as independent states.¹²⁵

2.3.5. Estonia's, Latvia's, and Lithuania's Establishment as Independent States

Barring certain exceptions, Estonians, Latvians, and Lithuanians were usually dominated by foreign elements throughout their history. Having gained their independence, they had to establish themselves as properly functioning nation-states, which required social, economic, and political reforms.¹²⁶ In terms of social and economic reform, lands were redistributed among peasants, which helped peasants gain economic independence, and served as a way to break the political and economic power of Baltic German landowners in Estonia and Latvia. Efforts were made to establish export oriented economies that relied on the Baltic region's strength in agriculture and animal farming. In terms of political reform, all three states adopted liberal democratic constitutions. But neither of the three states had the social and political culture and experience necessary to run a stable

¹²⁵ Otfinoski, *Nations in Transition...*, pp. 11-12, 61-62, 110.

¹²⁶ Romuald J. Misiunas and Rein Taagepera, *The Baltic States: Years of Dependence, 1940-1990*, (London: Hurst & Company, 1993), pp. 10-11.

democratic system. Amidst this problem the world plunged into the Great Depression. Due to political polarization, coupled with the inability to maintain a healthy economy during the hard times of the Depression, all three states experienced political instability as governments were formed and collapsed one after another.¹²⁷ This persistent instability hampered the implementation of the necessary reforms.

Frustrated with the inability of the democratic system to solve the problems of their countries, three politicians seized power and established themselves as dictators in their respective countries.¹²⁸ Konstantin Pats of Estonia initially seized power on the pretext of a possible rightist extremist takeover of the country. Karlis Ulmanis of Latvia and Antanas Smetona of Lithuania initially seized power on the pretext of possible leftist extremist takeovers of their countries. Neither of the three dictators had any clear ideology, but Ulmanis and Smetona were to a certain extent sympathetic for Italian-style fascism, while Pats indicated that his regime was as a transition stage towards a stable democratic system. In any case, all three men focused on political stability and economic growth. They enforced political stability and prevented further polarization by imposing martial law, censoring the press, and placing strict limitations on all political activities. Those who dissented to the authoritarian rule were arrested. In

¹²⁷ Misiunas, *The Baltic States: Years of Dependence...*, pp. 13-14.

¹²⁸ Otfinoski, *Nations in Transition...*, pp. 12-13, 62-63, 110. Also see; Misiunas, *The Baltic States: Years of Dependence...*, pp. 11-12. Also see; O'Connor, *History of the Baltic States*, pp. 94, 96.

terms of the economy, especially in Latvia, the state became heavily involved with the private sector through the use of taxation, pricing, and credit-lending. This was done in order to guide the economy towards more industrial and agricultural production, and less unemployment.¹²⁹ With the help of the fact that the world was moving out of the economic depression, but also due to their economic policies, these three regimes managed to improve the economic condition in their countries.

Based on the new-found prosperity and stability, the Baltic people experienced a significant cultural growth.¹³⁰ There was a marked increase in the production of cultural works in literature, music etc. There was also a significant growth in the number of schools. All three countries maintained national universities which conducted courses in the native languages of the three countries.

Although some sections of society continued to resent the authoritarian rule, most people welcomed the prosperity and the stability that came after the regime changes in their countries.¹³¹ Prosperity, stability, and cultural growth brought about during their regimes allowed Pats, Ulmanis, Antanas to enjoy popular support; and this popular support allowed them to stay in power until the

¹²⁹ O'Connor, *History of the Baltic States*, pp. 97-98. Also see; Georg von Rauch, *The Baltic States: The Years of Independence: Estonia, Latvia, Lithuania 1917-1940*, (London: C. Hurst & Co. Ltd., 1995), pp. 160-161.

¹³⁰ Misiunas, *The Baltic States: Years of Dependence...*, p. 13.

¹³¹ *Ibid.* p. 13.

events of Second World War. Although having put an end to the Baltic peoples' experiment with democracy, the regimes created a suitable environment for the strengthening of Baltic culture. This would prove to be important in the survival of Baltic culture during the upcoming long years of Soviet domination.

2.4. THE PERIOD FROM THE SECOND WORLD WAR TO THE END OF SOVIET RULE

2.4.1. The Second World War and the Loss of Independence

Estonia's, Latvia's, and Lithuania's experiences as independent states were cut short by the events of the Second World War. The Baltic states attempted to protect themselves from the looming war by maintaining a policy of neutrality, and forming a defensive Baltic alliance.¹³² Their efforts were going to be vain, because they were located in the middle of a struggle that was to take place between two great powers: Nazi Germany and the Soviet Union. Both Nazi Germany and the Soviet Union wanted control of Eastern Europe, and naturally the Baltic states were a part of this struggle. During the course of the Second World War, the Baltic states were overrun first by the Soviets, then the Nazis, and then again by the Soviets. This meant that, by 1940, all three Baltic countries had ceased to exist as independent states. Furthermore, the second Soviet occupation was to be a long lasting one, for it lasted from the end of the Second World War until the collapse of the Soviet Union. The events that took place during this

¹³² O'Connor, *History of the Baltic States*, p. 108.

Soviet occupation and control was to leave bitter memories for the Baltic people, especially Estonians and Latvians.

With the end of the Second World War, Nazi Germany had been pushed out of the Baltic states by the Soviets. But at the same time, Soviets had seized control of all three Baltic states. For the Soviet Union, the control of the Baltic states was important for two reasons:¹³³ 1) The control of the Baltic states increased Soviet sphere of influence in Eastern Europe, 2) The Baltic states acted as a buffer zone to protect inner parts of the Soviet Union against possible military aggression coming from the west, which to the Soviets would mostly likely be one from Germany. As a relic of Tsarist Russian mentality, the Soviet Union viewed the Baltic states as naturally belonging to the Union.¹³⁴ For this reason, unlike other Eastern European states during the post-war era, the Baltic states did not become satellite states with communist regimes; they were forcefully incorporated into the Soviet Union.¹³⁵ Now having full control over the Baltic states, the Soviet Union under Joseph Stalin's rule implemented a number of policies in these three states that were to have a lasting impact.

¹³³ O'Connor, *History of the Baltic States*, p. 109-111.

¹³⁴ Henry R. Huttenbach, "Introduction: Towards a Unitary Soviet State: Managing a Multinational Society, 1917-1985," in *Soviet Nationality Policies: Ruling Ethnic Groups in the USSR*, ed., Henry R. Huttenbach (London: Mansell Publishing Limited, 1990), p. 4.

¹³⁵ Otfinoski, *Nations in Transition...*, pp. 14-15, 63-64, 111-112.

2.4.2. Soviet Rule and the Second Instance of Russification

The most important policy to mention was the russification of the Baltic countries. Russification is the most important policy to mention because it was the policy that subjugated the Baltic people, and changed the ethnic composition in the region. The change in the ethnic composition in turn would influence the way Estonia, Latvia, and Lithuania would go onto enact citizenship policies after they declared their independence in 1990.

The russification policy of this time period shared similarities with the russification policy of the Tsarist era. In contrast to policy of the previous era, however, as was mentioned earlier the more recent russification policy was much more ruthless and calculated in character. It is interesting to note that the term “russification” was never used by the Soviet Union. The founding doctrines of the Soviet Union, as outlined by its first leader Vladimir Lenin specifically criticized and opposed aggressive Russian nationalism and any attempt to subjugate other nations.¹³⁶ The Soviet Union was initially meant to defend internationalism; the ideal of bringing together the working classes of various nationalities in an effort to build a well-functioning socialist system, which in turn would lead to communism.¹³⁷ In such a system, each separate nation was meant to grow and cultivate itself, and contribute its share to the common good. No individual nation

¹³⁶ Ivan Dzyuba, *Internationalism or Russification? A Study in the Soviet Nationalities Problem*, (New York: Monad Press, 1974), pp. 25, 42.

¹³⁷ Dzyuba, *Internationalism or Russification...*, pp. 27, 33, 46, 49.

was meant to dominate other nations. Furthermore, the concept of nation itself was not opposed, but instead seen as an indispensable step toward a successful socialist system.¹³⁸

Stalin assumed control of the Soviet Union after Lenin passed away, and changed the way the Soviet Union functioned. Aggressive Russian nationalism had been a growing phenomenon during the later stages of the Tsarist period, and it continued to have an effect on Russian minds even after the socialist take-over of power in Russia.¹³⁹ Stalin shared the mentality of the Russian nationalists; the future of the Soviet Union would revolve around the interests of Russians with other ethnic groups acting as subordinates. For this reason, during Stalin's rule the ideas of Russian nationalism came to be implemented through distortion of internationalism.¹⁴⁰

Internationalism became a tool to create one common Soviet people; united under common ideals, and with no national distinctions. Nationalism was officially seen as a subversive idea; contrary to the ideal of the Soviet people. But in truth this rhetoric meant the promotion of Russian culture and influence at the expense of other cultures.¹⁴¹ With increased frequency Russian culture - its

¹³⁸ Dzyuba, *Internationalism or Russification...*, pp. 24, 44.

¹³⁹ Weeks, *Nation and State in Late Imperial Russia...*, p., 68. Also see; Dzyuba, *Internationalism or Russification...*, pp. 62-64.

¹⁴⁰ Dzyuba, *Internationalism or Russification...*, pp. 40, 42-43, 46. Also see; Huttenbach, "Introduction: Towards a Unitary Soviet State...", pp. 3, 5.

¹⁴¹ Dzyuba, *Internationalism or Russification...*, pp. 45, 65-66, 92-93. Also see; Misiunas, *The Baltic States: Years of Dependence...*, p. 120.

history, language, and character - came to be more and more praised, while other cultures became progressively more undermined. The ideal was to create the Soviet people, but it was to be achieved through the unifying power of Russian culture. As such, internationalism was turned into the new version of russification.

The Soviet Union, just like Tsarist Russia, was a multi-ethnic formation. As was mentioned earlier Tsarist Russia had no clear policy towards non-Russians. In contrast, Soviet Union's approach to non-Russians mainly revolved around the process of russification. Henry Huttenbach concisely explains Soviet Union's approach by stating;

“Commitment to a unitary state with a homogeneous citizenry lies at the heart of all Soviet nationality policies since Lenin, the belief that the hodgepodge of Eurasian peoples could be fused by shrewd government management into a single, essentially Russian-oriented, people.”¹⁴²

In terms of the Baltic region, the new form of russification was carried out in two ways: by suppressing Baltic culture, and by changing the ethnic composition of the Baltic region. The suppression of Baltic culture helped Russian culture to penetrate into the Baltic region. The ethnic alteration enforced this process by decreasing the number of those who would oppose this process, and

¹⁴² Huttenbach, Huttenbach, “Introduction: Towards a Unitary Soviet State...,” p. 3.

increase the number of those who would support this process.¹⁴³ These changes would allow Russians to better dominate the Baltic region.

2.4.3. Cultural Suppression

Baltic culture was suppressed in the following manner: Russian was declared as the official language in the Baltic countries; as such the Baltic people had to do deal with Soviet authorities not in their own native language, but in Russian.¹⁴⁴ Furthermore all major institutions throughout the Soviet Union used Russian, and most of the noteworthy cultural, scholarly, and scientific work were produced in Russian.¹⁴⁵ Russian was not made compulsory in the Baltic education system, but the Baltic people were expected to become bilingual by taking optional Russian courses.¹⁴⁶ The Russians who immigrated to the Baltic region, however, were not expected to learn the local languages. Teachers were trained according to Soviet directives, which reflected Russian interests. It was evident that Russian enjoyed a dominant position not only in the Soviet Union in general, but also specifically in member states like the Baltic states. This domination naturally weakened the position of other languages of Soviet Union such as the Baltic languages.

Besides language policies, official cultural events were held to praise

¹⁴³ O'Connor, *History of the Baltic States*, p. 127.

¹⁴⁴ Otfinoski, *Nations in Transition...*, pp. 15-16, 64-65, 112.

¹⁴⁵ Dzyuba, *Internationalism or Russification...*, pp. 135-136, 156-157, 159, 161, 163.

¹⁴⁶ O'Connor, *History of the Baltic States*, p. 135. Also see; Misiunas, *The Baltic States: Years of Dependence...*, pp. 114-115, 130.

Russian culture.¹⁴⁷ Furthermore, all Baltic cultural work - literature, theater etc. - were regulated by strict Soviet guidelines.¹⁴⁸ These guidelines restricted overt expressions of Baltic culture. In such works, not only were people expected to abstain from criticizing the Soviet system, but were also expected to abstain from making neutral comments. As such, Soviet guidelines expected people to praise the Soviet system. Failure to comply with Soviet guidelines resulted in a number of possible outcomes: official warning, demotion, house arrest, actual arrest, interrogation under torture, or deportation.¹⁴⁹ Faced with such potential consequences, most people chose to comply with Soviet guidelines. It was for this reason that, in comparison to the independence years, the amount of noteworthy Baltic cultural work plummeted during Soviet rule.¹⁵⁰

Faced with Soviet occupation and cultural suppression, some Estonians, Latvians, and Lithuanians chose to wage an armed struggle that began in 1944.¹⁵¹ They collectively came to be called “the Forest Brothers”. They would hide in the forested areas of the Baltic region, and only leave to collect supplies and employ hit-and-run tactics against Soviet personnel and infrastructure. The Soviet authorities responded with overwhelming brute force to wipe-out members of the Forest Brothers. They also carried out propaganda campaigns portraying the Forest Brothers as bandits preying on local populations. Faced with limited

¹⁴⁷ Misiunas, *The Baltic States: Years of Dependence...*, p. 115.

¹⁴⁸ *Ibid.* pp. 116-118.

¹⁴⁹ *Ibid.* p. 121.

¹⁵⁰ O'Connor, *History of the Baltic States*, p. 132.

¹⁵¹ Misiunas, *The Baltic States: Years of Dependence...*, pp. 83, 86, 88-90, 92-93.

supplies, diminishing public support (based both on propaganda and increased complacency with Soviet rule), and overwhelming Soviet military power, the remaining Forest Brothers decided to disband after about eight years of operation.

2.4.4. The Change in the Ethnic Composition of the Baltic States

The ethnic composition of the Baltic region was changed in the following manner: With the onset of the Soviet occupation many ethnic Estonians, Latvians, and Lithuanians were imprisoned, exiled, or outright executed. At the same time, Russians and other Russian-speaking people from around the Soviet Union were transferred to the Baltic countries.¹⁵² This meant that as the number of ethnic Estonian, Latvian, and Lithuanian people went down, the number of Russian and other Russian-speaking people went drastically up. As a side note; thousands of Estonians, Latvians, and Lithuanians had fled their countries or perished when trying to flee because of the war and the Soviet occupation.

The russification of the Baltic states had the impact of drastically changing the ethnic composition of Estonia and Latvia. Before 1940, Estonia's ethnic Estonian population comprised about ninety percent of the total population. In Latvia, the ethnic Latvians comprised about seventy-seven percent of the total population. As a result of Soviet Union's policy, by 1989 ethnic Estonian percentage had dropped to sixty-two percent, while ethnic Latvian percentage had

¹⁵² Otfinoski, *Nations in Transition*..., pp. 14-16, 64-65, 112.

dropped to fifty-two percent. At the same time, Russians came to compromise twenty-eight percent of Estonia's, and thirty percent of Latvia's total population.¹⁵³ The situation became especially drastic for Latvia; ethnic Latvians became minorities in their capital Riga, and the six other major cities of Latvia.¹⁵⁴

Lithuania was not affected by this policy as much as Estonia and Latvia were. The proportion of ethnic Lithuanians with the regards to the total population of Lithuania remained stable at around eighty percent. Russians came to compromise about twelve percent of the total population.¹⁵⁵ The reason behind why Lithuania was not as affected by Estonia and Latvia was because Lithuania was not as industrialized as the other two Baltic states. Russians wanted to work in factory jobs like they did back in Russia, and Lithuania did not offer the same opportunity as did Estonia and Latvia.¹⁵⁶ For this reason there was not much incentive for Russians to move to Lithuania. Lithuania's lack of industrialization thus made it less of target for Russian immigration than Estonia and Latvia.

2.4.5. The End of Soviet Rule and the Path to Independence

There was not much the Baltic people could do in the proceeding decades

¹⁵³ The percentages have been compiled from; Anton Steen, "Ethnic Relations, Elites and Democracy in the Baltic," *Journal of Communist Studies and Transition Politics*, 16, 4, (2000): pp. 68-87, pp. 71-72. Also see; Anton Steen, "Accessioning Liberal Compliance? Baltic Elites and Ethnic Politics under New International Conditions," *International Journal of on Minority and Group Rights*, 13, 2-3, (2006): pp. 187-207, p. 192.

¹⁵⁴ Otfinoski, *Nations in Transition*..., p. 58.

¹⁵⁵ Steen, "Ethnic Relations, Elites and Democracy in the Baltic," pp. 71-72. Also see; Steen, "Accessioning Liberal Compliance...", p. 192.

¹⁵⁶ Otfinoski, *Nations in Transition*..., p. 103.

after Soviet annexation.¹⁵⁷ The amount of repression imposed by the Soviet Union was eased after Stalin's death in 1953. For the next couple of years, the Baltic states were given partial autonomy in economic affairs, which gave the Baltic states the opportunity to improve their economic standards. This period, however, came to an end in 1965 when Leonid Brezhnev became the leader of the Soviet Union. From the time it began during Stalin's rule, cultural suppression continued throughout the 1970s and early 1980s. The Baltic people continued conform with Soviet rule, though they never lost their resolve to preserve their culture. Although they had managed to preserve their culture, the Baltic people entered the 1980s with little hope for the future because they saw no opportunity to break away from Soviet control.

Things eventually began to change in favor of the Baltic states. Although maintaining a tight grip on those it ruled, the Soviet Union began to show signs of critical failure by the 1970s. Soviet economic doctrine was focused on mass industrial production, and it was highly successful in this regard. By the 1970s, however, the world was moving toward a new form of economic growth based not on industrial production, but on information technologies. The development and proper use of information technologies required an unrestricted flow of information.¹⁵⁸ This was completely incompatible with the way the Soviet Union

¹⁵⁷ Otfinoski, *Nations in Transition...*, pp. 16, 65, 112-113. Also see; Misiunas, *The Baltic States: Years of Dependence...*, p. 204.

¹⁵⁸ Scott Shane, *Dismantling Utopia: How Information Ended The Soviet Union*, (Chicago: Ivan R. Dee, 1994), pp. 59, 63-64, 67-68.

functioned, because it maintained control over its people through tight controls on the flow of information.¹⁵⁹ An enormous amount of manpower, resources, and money was spent on suppressing information that could expose the rampant human rights abuses, mismanagement, corruption, and stagnation that was taking place in the Soviet Union.¹⁶⁰

Brought to power in 1985, Soviet leader Mikhail Gorbachev considered reform a necessity if the Soviet Union was to survive in a changing world. Although repeatedly warned that loosening restrictions on information flow would lead to the downfall of the Union, Gorbachev went ahead to loosen restrictions, and encouraged people of the Soviet Union to express their complaints with the system.¹⁶¹ Gorbachev believed that this reform process could be used in a controlled manner to identify the problems of the Union, and help it to become competitive again in the world economy. It did not work as Gorbachev had hoped; when people got a taste of freedom, they could no longer be contained.¹⁶² The Soviet Union began to lose its ability to suppress information; initial reluctant criticisms of the system eventually led to more and more open criticisms and protests. Those who resented the system, but who were too afraid to speak became emboldened when more and more people around them decided to speak. As such, the loss of the ability to control information led to loss of the ability to control

¹⁵⁹ Shane, *Dismantling Utopia...*, pp. 44, 53, 72.

¹⁶⁰ *Ibid.* pp. 30, 45, 51, 54, 58, 60.

¹⁶¹ *Ibid.* pp. 5, 45, 66-67.

¹⁶² *Ibid.* pp. 17, 25, 40, 46.

people. This trend first began in Russia, and eventually spread to other parts of the Soviet Union.¹⁶³

The Baltic states were too small in comparison to the rest of the Soviet Union to attempt a forceful break-away. The reform process Gorbachev initiated, however, presented a golden opportunity for independence. The Baltic people's path to independence began in 1987, and went ahead in three phases:¹⁶⁴ 1) Protests regarding Soviet rule, 2) Call for autonomy, and 3) Push for independence. Protests first began over non-political issues; such as when the Latvians campaigned to stop the construction of a large hydro-power plant that would damage the environment.¹⁶⁵ In an atmosphere of Gorbachev-initiated reforms, Latvians pressed on until the local Soviet authorities decided to scrap the project. Such non-political protests spilled over to Estonia and Lithuania.

The authorities' unwillingness to crack down on protests further encouraged people.¹⁶⁶ Emboldened by success of ecological protests, people began to protest political issues as well; such as when in 1987 people protested the Soviet annexation of the Baltic countries, held national song festivals in 1988

¹⁶³ Misiunas, *The Baltic States: Years of Dependence...*, p. 303.

¹⁶⁴ *Ibid.* pp. 303, 311, 322.

¹⁶⁵ Protests regarding environmental concerns had historically been partially permitted in the Soviet Union. This provided a useful opportunity for the Baltic people to begin expressing their opposition to Soviet policies. Soviet reaction to such protests would help Baltic people determine whether to act more timidly or more aggressively when opposing Soviet rule. As shall be explained in this chapter, the lenience Soviet authorities showed towards ecological protests convinced the Baltic people to act more aggressively. For reference, please see; Anatol Lieven, *The Baltic Revolution: Estonia, Latvia, Lithuania and the Path to Independence*, (London: Yale University Press, 1993), p. 220.

¹⁶⁶ Misiunas, *The Baltic States: Years of Dependence...*, pp. 304-307.

openly celebrating Baltic culture, and formed a 692 km human chain in 1988 to express solidarity against Soviet rule.¹⁶⁷ In 1988 with Estonia taking the lead this time, protests eventually turned to popular fronts demanding Baltic autonomy for internal affairs. Such popular front eventually came to encompass a large majority of the Baltic population.¹⁶⁸ Gorbachev's stance regarding the events in the Baltic region was beneficial for the Baltic drive for autonomy. Gorbachev did not want to tarnish his positive image as a liberal reformer, and thus refused to employ violent means to suppress the opposition to Soviet Rule.¹⁶⁹ In this lenient atmosphere created by Gorbachev's rule, Soviet authorities in the Baltic region were unwilling to forcefully bring the Baltic people back in line with Soviet rule.

The path towards of independence entered its final phase by 1989; calls for autonomy turned into a push for independence. Lithuania was more confident than both Estonia and Latvia in pursuing independence because of its larger size and also because of its smaller Russian minority population. Estonia and Latvia meanwhile had to contend with a much larger Russian minority population which was for the most part vehemently opposed to the idea of Baltic independence.¹⁷⁰ Under such domestic circumstances, Estonia and Latvia were more timid than Lithuania, and thus were in favor of a more gradual approach to

¹⁶⁷ Otfinoski, *Nations in Transition...*, pp. 16-17, 114.

¹⁶⁸ Misiunas, *The Baltic States: Years of Dependence...*, pp. 311-312, 316, 318. Also see; Otfinoski, *Nations in Transition...*, pp. 16-17, 65-66, 113-114.

¹⁶⁹ O'Connor, *History of the Baltic States*, p. 146, 156, 162.

¹⁷⁰ The Russian minority's opposition to Baltic independence stemmed from their fear of becoming a vulnerable minority group within newly independent Baltic states that might act hostile towards them based on historical grudges. For reference, please see; O'Connor, *History of the Baltic States*, p. 153.

pursuing independence.¹⁷¹

Due to its confidence described above, and also emboldened by the previous successes and the rapid growth Baltic opposition towards Soviet rule, Lithuania decided to take the lead by declaring its independence in March 1990.¹⁷² Up until this stage Soviet authorities had mostly relied on arrests and staged rallies in support of the Soviet Union. But when the Baltic countries began to demand independence, the Soviet Union began to resort to open violence. By now, however, the international community had focused its attention on the Baltic countries. The Soviet Union was portraying itself as a reforming country, and its actions in the Baltic region were hurting its international image. Coupled with this was the fact that there was by that time too much momentum behind the Baltic independence movements; people refused to back down even when threatened with violence. Faced with this reality the Soviet Union decided to end its violent crackdown.¹⁷³

Convinced that Gorbachev's leadership was ruining the Union, Soviet hardliners attempted a coup in August 1991. The coup failed, but by now Gorbachev had lost his power, and the Union was nearing collapse. With the Soviet Union collapsing, Estonia and Latvia followed the example of Lithuania, and declared their independence in late August 1991. In September 1991, the

¹⁷¹ Lieven, *The Baltic Revolution...*, p. 241.

¹⁷² Misiunas, *The Baltic States: Years of Dependence...*, pp. 322, 329, 333.

¹⁷³ *Ibid.* pp. 329. Also see; Otfinoski, *Nations in Transition...*, pp. 16-18, 66, 116.

Soviet Union acknowledged the independence of all three Baltic states. As its final act, in December 1991 the Soviet Union decided to dissolve itself.¹⁷⁴ After about fifty years of foreign occupation, Estonia, Latvia, and Lithuania had once again become independent states.

2.5. THE PERIOD OF POST-SOVIET INDEPENDENCE

During the period Soviet rule, Estonia, Latvia, and Lithuania were subject to Soviet interests. Soviet Union's russification policy had altered the ethnic composition of the Baltic region. The ethnic tension that existed between the native peoples of the Baltic region and the Russian-speaking people was masked by Soviet ideology; which maintained that there was harmony between different groups of people, and that all groups possessed the same political and cultural rights.¹⁷⁵

But as the Soviet Union ceased to exist; Estonia, Latvia, and Lithuania became free to express themselves. The Baltic people consider the Soviet occupation to be like a bad dream from which they were finally able to wake up in 1990.¹⁷⁶ Despite Soviet propaganda, to Estonians, Latvians, and Lithuanians Soviet interests were nothing more than Russian interests in disguise. And for this reason, the Baltic people developed a deep resentment towards Russia, and also

¹⁷⁴ Otfinoski, *Nations in Transition*..., pp. 18, 66, 116.

¹⁷⁵ Steen, "Ethnic Relations, Elites and Democracy in the Baltic," p. 75.

¹⁷⁶ Otfinoski, *Nations in Transition*..., pp. IX-X.

towards the Russians and their descendants who came to their country during the Soviet occupation. To the Baltic people, the Russian minority who live amongst them are like the remnants of that Soviet occupation.¹⁷⁷

It is interesting to note that Estonia has developed a harsher stance against the Russian minority than Latvia has. But one would normally expect Latvia to have developed a harsher stance, since ethnic Latvians form a much more narrow majority than do ethnic Estonians. Anton Steen explains this peculiarity by making two points:¹⁷⁸ 1) Ethnic Estonians are smaller in number than ethnic Latvians; below the psychological barrier of one million. This makes them feel much more threatened by a possible Russian cultural assimilation. 2) Estonia was ethnically much more homogenous than Latvia was before the Soviet occupation. Latvia was already considered a multi-ethnic country prior to the Soviet occupation. Ethnic Estonians were accustomed to be securely in the majority, unlike ethnic Latvians. As such, the sharp drop from a ninety percent majority to a sixty two percent majority was especially painful for the ethnic Estonians.

As the two Baltic states that were most affected by the policies of the Soviet Union, Estonia and Latvia took measures against the Russian minority. Due to their historical resentment and fear, Estonia and Latvia sought to limit the

¹⁷⁷ Renal'D Simonian, "The Russian Diaspora in the Baltic Countries," *Russian Politics and Law*, 42, 4, (2004): pp. 67-88, pp. 81-82. Also see; Otfinoski, Otfinoski, *Nations in Transition...*, p. 159.

¹⁷⁸ Steen, "Ethnic Relations, Elites and Democracy in the Baltic," p. 81-82.

ability of the Russian minority to challenge the rule to ethnic Estonian and Latvian majority.¹⁷⁹ One such way was to establish a citizenship mechanism that would exclude the Russian minority. Since political participation depended on being a citizen of Estonia and Latvia, the Russian minority was automatically barred from wielding political power. As a consequence of this discriminatory citizenship policy, both states have had troubled relations with Russia.¹⁸⁰

Lithuania, on the other hand, was not in the same position as that of Estonia and Latvia. Its ethnic Lithuanian population remained at the same proportion with regards to the total population, and its Russian minority was a small one. As such, Lithuania did not feel threatened by the Russian minority like Estonia and Latvia was. As a consequence of this, the citizenship mechanism it adopted after regaining its independence was an inclusive one. And for this reason, Lithuania has not had the kind of troubled relations with Russia that Estonia and Latvia have had.¹⁸¹

A more detailed account of the nature and the consequences of the citizenship policies of the Baltic states shall be provided in the next chapter of this thesis.

¹⁷⁹ Steen, "Accessioning Liberal Compliance...", p. 187.

¹⁸⁰ Otfinoski, *Nations in Transition...*, p. 24.

¹⁸¹ *Ibid.* p. 103.

2.6. CONCLUSION

This chapter was meant to give an outline of Baltic history with the aim of shedding light onto the actions of current day Estonia, Latvia, and Lithuania.

Although coming from different backgrounds, the Baltic people have come to share a similar fate throughout their history. Throughout their history the Baltic people have been subjugated to the interests of foreign elements. Lithuania experienced an exception to this trend for some time, but it too eventually succumbed to the interests of foreign elements. For Estonia and Latvia, their first experience with subjugation was with the Teutonic Knights. Lithuania's first experience with subjugation came in the form of Polish cultural domination. From this point onwards, however, the fate of the Baltic people became one as all three groups fell under the control of Tsarist Russia.

During Tsarist Russian rule, the Baltic people experienced the first instance of Russian cultural imposition. The Baltic people managed to strengthen their sense of nationhood with this experience, and would go onto achieve a brief period of independence with the collapse of Tsarist rule in Russia. During this time period the Baltic people got a taste of independence, and also had a chance to experiment with democracy. Their experimentation did not last long, as all three of the Baltic states experienced coups that resulted in authoritarian regimes. It was at this time period marked by stability and prosperity, however, that the Baltic people found a good opportunity to cultivate their culture. This would prove to be useful, for the Baltic people would once again fall under Russian influence, but

this time in the form of the Soviet Union.

For about fifty years the Baltic people were subjected to a second instance of Russian cultural imposition. This imposition was performed both by strict cultural restrictions, but also by forced population transfers. Although the Baltic people were able to successfully preserve their culture in the face of Russian cultural influence, there was not much they could do about the population transfers. Estonia and Latvia were affected in a very significant way; both Estonians and Latvians lost their dominant majority position in their native countries. Estonians and Latvians were now forced to live alongside a large Russian-speaking minority. Lithuania was spared this fate, because its low levels of industrialization made it unappealing for immigration for the Russian-speaking people.

The Baltic people's experiences with Soviet occupation had a defining effect on their post-independence behavior. Although all three Baltic peoples were resentful of the fifty year-long occupation, Estonians and Latvians were especially resentful about it. This was due to the drastic change in the ethnic composition of their country during the Soviet rule. Seeing the Russian-speaking minority as a painful reminder of the Soviet occupation, Estonians and Latvians became determined to curtail the influence of the Russian minority in post-independence Estonia and Latvia. Towards this end, Estonia and Latvia adopted exclusive citizenship policies to prevent the Russian minority from further influencing Estonia and Latvia. Lithuanians were more comfortable with their position in the

post-independence era, because their level of ethnic dominance remained stable throughout Soviet rule. As such, Lithuanians were not as uncomfortable about the Russian minority living in their country as Estonians and Latvians were. Therefore, Lithuania went about creating a more inclusive citizenship policy because it saw no need to block Russian minority influence in Lithuania.

Estonia's, Latvia's, and Lithuania's historical experiences came to play a defining role in the way they went about creating their citizenship policies. Therefore, this chapter exemplifies the usefulness of analyzing a state's history in order to understand its present day actions.

CHAPTER III:

THE CITIZENSHIP POLICIES OF

THE BALTIC STATES

3.1. INTRODUCTION

This chapter focuses on the citizenship policies enacted by the Baltic states. The citizenship policies in question here are the ones enacted after the Baltic states regained their independence following the disintegration of the Soviet Union in 1990. Additionally, this chapter will delve upon the domestic consequences of the citizenship policies enacted by the Baltic states.

After establishing themselves as independent states following the collapse of the Soviet Union, the Baltic states were faced with the task of creating their citizenship policies. The Baltic states were under strict Soviet rule for about fifty years prior to 1990, and during this time they lacked the freedom to enact policies based on their own will. The Soviet Union imposed a russification policy on them; which not only suppressed Baltic culture, but also brought in a large population of Russian-speaking people such as Russians, Ukrainians, and Belarusians. These Russian-speaking people are now collectively referred to as the Russian minority. This Russian minority was brought into the Baltic region against the will of the Baltic states. Having now regained their independence, the Baltic states had to now decide what to do with this Russian minority. By enacting inclusive

citizenship policies, they could allow the Russian minority to fully participate in the politics of newly independent Baltic states. This would mean that the Russian minority would be able to influence the Baltic states just like ethnic Estonians, Latvians, and Lithuanians could. The Baltic states, however, could also enact exclusive citizenship policies, which would essentially relegate the Russian minority to a politically powerless position in the Baltic states.

The international community (including the EU, Council of Europe, NATO, and OSCE) expected them to go about creating citizenship policies that conformed to international standards.¹⁸² The international standard in this context is that permanent residents who had been living in the territory of a successor state should be granted citizenship by this successor state. Lithuania proceeded to follow the international standard by granting citizenship to the Russian minority. Estonia and Latvia, however, chose an alternative route. This route involved granting citizenship to those who could prove that they were already a citizen prior to the Soviet occupation, or who were descendants of these citizens.¹⁸³ This automatically excluded the large Russian minority out of citizenship, because the members of the Russian minority had started living in Estonia and Latvia after these two states came under Soviet control.

Estonia and Latvia evaded international criticism by indicating that the

¹⁸² Nida M. Gelazis, "The European Union and the Statelessness Problem in the Baltic States," *European Journal of Migration and Law*, 6, 3, (2004): pp. 225-242, p. 232.

¹⁸³ David J. Galbreath, "Still 'Treading Air'? Looking at the Post-Enlargement Challenges to Democracy in the Baltic States," *Demokratizatsiya*, 16, 1, (2008): pp. 87-96, pp. 88-89.

international standards for citizenship policies were only applicable to successor states. According to Estonia and Latvia (and Lithuania as well), they were not successor states, but states that had regained their independence after having been occupied by a foreign power.¹⁸⁴ As a way of reinforcing this claim, Estonia and Latvia readopted their pre-Soviet occupation constitutions.¹⁸⁵ Ethnic Estonians and Latvians born prior Soviet occupation had already acquired their citizenship under the legal systems that existed when these constitutions were in effect. When Estonia and Latvia readopted these constitutions, these ethnic Estonians and Latvians were naturally considered as citizens. Meanwhile the descendants of these ethnic Estonians and Latvians derived their citizenship through their lineage. The Russian minority arrived in Estonia and Latvia after the Soviet occupation, a time in which the pre-Soviet occupation constitutions were not in effect. Therefore, when Estonia and Latvia readopted these constitutions, the Russian minority lacked the legal basis to be automatically considered as citizens. The Russian minority had to acquire citizenship based on citizenship policies enacted after Estonia and Latvia regained their independence. This was to be the starting point of the citizenship troubles of the Russian minority in both Estonia and Latvia.

¹⁸⁴ Gelazis, "The European Union and the Statelessness Problem..." pp. 232-3. Also see; Annelies Lottmann, "No Direction Home: Nationalism and Statelessness in the Baltics," *Texas International Law Journal*, 43, 3, (2008): pp. 503-521, p. 505.

¹⁸⁵ David Galbreath, "The Politics of European Integration and Minority Rights in Estonia and Latvia," *Perspectives on European Politics and Society*, 4, 1, (2003): pp. 35-53, pp. 38-39.

Estonia and Latvia also successfully evaded other criticisms as well.¹⁸⁶ For example, criticisms that the Estonia and Latvia's citizenship policies were discriminating against the Russian minority on ethnic and language grounds were confronted with the argument that their policies were not about ethnicity or language, but about proving one's loyalty and connection to the states of Estonia and Latvia. Criticisms that Estonia's and Latvia's citizenship policies were creating a statelessness problem were confronted with the argument that the Russian minority always had the option of returning back to Russia and to acquire Russian citizenship.

3.2. BALTIC STATES' HISTORICAL REASONS FOR THEIR PRESENT ACTIONS

The reason as to why Estonia and Latvia decided to follow an alternative route to that of Lithuania is a historical one. As was explained in the previous chapter; Estonia's and Latvia's experiences under Soviet rule was different to that of Lithuania's.¹⁸⁷ Estonia's and Latvia's experiences with Soviet-style forced demographic change left bitter memories for both Estonians and Latvians. These past experiences turned into what Renal'd Simonian calls “a fixation on what happened in the past.”¹⁸⁸ This fixation of Estonia and Latvia, in turn, led to “a

¹⁸⁶ Gelazis, “The European Union and the Statelessness Problem...,” p. 232.

¹⁸⁷ Lottmann, “No Direction Home...,” p. 505.

¹⁸⁸ Renal'D Simonian, “The Russian Diaspora in the Baltic Countries,” *Russian Politics and Law*, 42, 4, (2004): pp. 67-88, p. 82.

stubborn desire to build a mono-ethnic state”¹⁸⁹ aimed at ensuring the supremacy of the titular majorities at the expense of the Russian minority. Unlike Estonia and Latvia, Lithuania's ethnic Lithuanian population was able to maintain its original and dominant position throughout Soviet rule. As such, Lithuanians did not come to see the ethnic Russians living amongst them as a source of threat like Estonians and Latvians did. Lithuanians felt comfortable with their position in society, and as such were inclined to follow the international standard when creating Lithuania's citizenship policy.

There is, however, another explanation as to why Lithuania behaved differently from the other two Baltic states. Unlike Estonia and Latvia, Lithuania has a Polish minority similar in size to that of the Russian minority. Lithuanians have historically been as concerned about falling under Polish influence as much as falling under Russian influence.¹⁹⁰ Lithuanians historical sense of vulnerability towards the Poles have to a certain extent pushed them to closer relations with the East (unlike Estonia and Latvia), and to have better relations with Russia in comparison to the other two Baltic states.

¹⁸⁹ Simonian, “The Russian Diaspora...,” p. 80.

¹⁹⁰ Scott Radnitz, “The Tyranny of Small Differences: The Relationship between Ethnic Diversity Democracy in the Former Socialist Bloc,” *Demokratizatsiya*, 12, 4, (2004): pp. 575-606, p. 597.

3.3. THE BALTIC STATES FROM THE PERSPECTIVE OF DIFFERENT DEMOCRACY MODELS

The three Baltic states' stance towards citizenship can be viewed from perspective of different democracy models.¹⁹¹ Lithuania's citizenship policy fits to that of the liberal democracy model. What is meant by liberal democracy in this context is that a state should go about creating policies that are as inclusive as possible, without discriminating against anyone based on their background. Estonia and Latvia's citizenship policies, however, fit first to that of an ethnic democracy, and then to that of an ethno-liberal democracy. Ethnic democracy is an exclusionary type of democracy that bars certain groups in society from partaking in the activities involved with citizenship. An ethno-liberal democracy is somewhere between an ethnic and a liberal democracy: it still discriminates against certain groups, but it leaves a mechanism through which such groups can attain citizenship.

Both ethnic democracy and ethno-liberal democracy can be considered as a political method by which the elites running country can keep certain groups out of the political process.¹⁹² In the case of Estonia and Latvia, the elites of the ethnic Estonian and Latvian majority have used ethnic and ethno-liberal democracy to keep the large Russian minority out of the political process of Estonia and Latvia. By keeping the Russian minority out of politics, the elites of the titular majority

¹⁹¹ Galbreath, "The Politics of European Integration..." pp. 35-36.

¹⁹² Anton Steen, "Ethnic Relations, Elites and Democracy in the Baltic," *Journal of Communist Studies and Transition Politics*, 16, 4, (2000): pp. 68-87, pp. 71, 80.

feel reassured that the state will be protected from the influence of the Russian minority, and that the national character of the state will be preserved in favor of the titular majority.¹⁹³

As was indicated earlier, ethno-liberal democracy is distinguished from ethnic democracy by its mechanism which allows non-citizens to become citizens. This mechanism is the naturalization process. It involves tests that require those who seek citizenship to demonstrate keen knowledge about the state that administers the tests. These tests are often very difficult to pass for certain groups in society, as they usually lack the necessary knowledge these tests expect them to know. Such tests are often criticized by the international community for being discriminatory, as they consider such tests to be deliberately designed to be excessively hard for certain groups in society. But for the states that administer such tests, such as Estonia and Latvia, these tests are not discriminatory, but are merely designed to evaluate whether or not an individual is truly fit to become a citizen.¹⁹⁴ An individual that manages to pass such a test has demonstrated his/her loyalty to the state, and that s/he has intimate knowledge of the state and the culture of its titular majority. As such, these tests are used to gauge whether or not a person who desires to be a citizen is sufficiently assimilated into the culture of the titular majority. Such a system reassures the elites who run the state that those who are to become citizens will not be a threat to the system established by

¹⁹³ Michael Ardivino, "Imagined Communities in an Integrating Region Baltic Region," *Demokratizatsiya*, 17, 1, (2009): pp. 5-17, p. 9.

¹⁹⁴ Gelazis, "The European Union and the Statelessness Problem..." p. 232.

the titular majority. Furthermore, being secure in the knowledge that those who pass the test are sufficiently assimilated, the elites feel free to allow the new citizen, regardless of his/her ethnic background, to hold the highest positions of office within the state.¹⁹⁵

Such a naturalization system is dubbed “thick-integration”: becoming a citizen is hard (especially for groups such as the Russian minority), but still is possible, and that those who do become citizens have sufficiently demonstrated that they are fit to serve in any position in society.¹⁹⁶ This thick-integration is further criticized for being concerned more with assimilation than with integration. The states that maintain this thick-integration system expect would-be citizens to let go of their old ways and adopt the ways of the titular majority. This is in contrast what is dubbed “thin-integration”: becoming a citizen is a much less demanding process and a process that is more inclusive in character (focusing more on integration than on assimilation).¹⁹⁷ As can be gathered from what has previously been said, Estonia and Latvia's citizenship policies represent thick-integration, whereas Lithuania's citizenship policies represent thin-integration.

Having given an overall picture of the citizenship policy issue in the Baltic states, it is now time to lay out in detail what the three Baltic states have done in terms of citizenship, and what the domestic consequences have been of their

¹⁹⁵ Anton Steen, “Accessioning Liberal Compliance? Baltic Elites and Ethnic Politics under New International Conditions,” *International Journal of on Minority and Group Rights*, 13, 2-3, (2006): pp. 187-207, pp. 187, 191, 204.

¹⁹⁶ Steen, “Accessioning Liberal Compliance...,” p. 191.

¹⁹⁷ *Ibid.* p. 187.

policy decisions.

3.4. THE CITIZENSHIP POLICIES OF LITHUANIA

3.4.1. Lithuania's Policies

Lithuania, by the virtue of having had a less harsh experience under Soviet rule and having a more favorable ethnic composition, chose a different path in terms of citizenship policy than the other two Baltic states. Furthermore, its decisions in terms of citizenship have not created the kind of troubled domestic situation as in the case of the other two Baltic states.¹⁹⁸

Lithuania, like Estonia and Latvia, made the claim that it was not a newly established state, but a state that had regained its independence following an illegal occupation by a foreign power. And like the other two Baltic states, it used this argument to create a citizenship policy that called back to its independence era that ended with the Soviet occupation. The law of citizenship that was passed into effect on December 5, 1991 entitled anyone who had been a citizen or a permanent resident of Lithuania before June 15, 1940 (and the descendants of both groups) to automatically become citizens of the post-Soviet occupation Lithuania.¹⁹⁹ In other words, Lithuania created a citizenship policy which basically covered all ethnic Lithuanians. But Lithuania diverged from Estonia and Latvia beyond this point, because it enacted additional policies that were to cover

¹⁹⁸ Steen, "Accessioning Liberal Compliance...", p. 193.

¹⁹⁹ Gelazis, "The European Union and the Statelessness Problem...", p. 227.

almost all of the remaining population of Lithuania.

One such policy was enacted even before Lithuania broke free of Soviet rule. The citizenship law enacted on November 3, 1989 granted citizenship to all permanent residents of Lithuania, irrespective of one's ethnicity, language, religion, or employment status.²⁰⁰ In order to acquire citizenship under this law, the permanent resident had to have been living in Lithuania for ten years, and had to be willing to swear an oath of loyalty to Lithuania;²⁰¹ which meant renouncing any other citizenship, ie. Soviet citizenship.²⁰² Acquiring citizenship through this law was such a simple process that the law was viewed as an automatic process that granted citizenship rather than a naturalization process. About ninety percent of those who were covered by this law took advantage of it to become citizens.²⁰³ This high figure demonstrated that the law provided for a realistic way for permanent residents to become citizens.

The opportunity to gain citizenship through this simple process ended with the passing of the December 5, 1991 law. Those who had hesitated to take advantage of the initial naturalization process were faced with a more demanding

²⁰⁰ Gelazis, "The European Union and the Statelessness Problem..." p. 227. This citizenship law makes the December 5, 1991 law redundant, as it already covers all the individuals the December 5, 1991 law covers. The rationale behind enacting the December 5, 1991 was most probably to attract ethnic Lithuanians who had been living in other countries when Lithuania regained its independence.

²⁰¹ Lottmann, "No Direction Home..." p. 509.

²⁰² Steen, "Ethnic Relations, Elites and Democracy in the Baltic," pp. 79.

²⁰³ Lottmann, "No Direction Home..." p. 509-510.

process with the passing of the new law.²⁰⁴ The law indicated that a person may acquire citizenship either through birth (by being born in Lithuania) or through naturalization. In order to be successfully naturalized, an individual had to; 1) pass a written and oral exam about the Lithuanian language and the basic provisions of the constitution of the Lithuanian state, 2) have lived in Lithuania for at least ten years, 3) have a permanent place of employment or a constant legal source of income. Individuals who fulfill these criteria are eligible to become citizens. Members of the former Soviet army are considered to be a special case in this regards.²⁰⁵ Although there is no specific law prohibiting them from becoming citizens, the constitutional court of Lithuania has deemed that they cannot be considered permanent residents without the special consent of the government. As such, members of the former Soviet army need the clearance of the government in order to become citizens.

3.4.2. The Domestic Consequences Of Lithuania's Policies

Lithuania's process of naturalization in theory is similar to that of both Estonia and Latvia. But in practice Lithuania has applied its naturalization process in much less stringent terms than the other two Baltic states.²⁰⁶ Furthermore, unlike the other Baltic states, Lithuania has granted in limited terms the clearance necessary for members of the former Soviet army to become citizens. As such the

²⁰⁴ Lottmann, "No Direction Home...", p. 510. Also see; Gelazis, "The European Union and the Statelessness Problem...", p. 227.

²⁰⁵ Gelazis, "The European Union and the Statelessness Problem...", pp. 227-228.

²⁰⁶ Lottmann, "No Direction Home...", p. 510.

establishment of Lithuania as an independent state has not created the kind of large non-citizen population that has been created following the establishment of the other two Baltic states.²⁰⁷

The result of such an inclusive approach to citizenship has been ethnic relations that are more harmonious than the other two Baltic states. The evidence for this can be seen in the results of studies that have measured perspectives on ethnic relations in all three of the Baltic states. These studies have measured ethnic relations both from the perspective of the elites, and from the perspective of the general population.

In terms of elites' perception, Lithuanian elites have a more positive outlook on ethnic relations than both Estonian and Latvian elites. According to one study,²⁰⁸ based on a scale of 1 to 5 (1 being "likely" and 5 being "unlikely"), Lithuanian elites' responses had a mean of 4.0 in the year 1994, and 4.2 in 1997. This means that Lithuanian elites considered ethnic confrontation to be mostly unlikely both in 1994 and in 1997 (note the 0.2 point increase towards "unlikely"; a sign perhaps towards improved ethnic relations). The same study also measured, from the perspective of the elites, what kind of confrontation would occur if a confrontation was indeed to occur.²⁰⁹ Based on a scale of 1 to 3 (1 being "massive violence" and 3 being "rhetoric only"), Lithuanian elites' responses had a mean of

²⁰⁷ Galbreath, "Still 'Treading Air...,' p. 89.

²⁰⁸ Steen, "Ethnic Relations, Elites and Democracy in the Baltic," pp. 75-77.

²⁰⁹ *Ibid.* pp. 75-77.

2.6 in 1994, and 2.8 in 1997 (note the 0.2 point increase towards “rhetoric only”). This means that Lithuanian elites believed that a possible ethnic confrontation would most probably occur in the form of rhetoric rather than in the form of violence.

In terms of perspective of the general population, people in Lithuania have a more positive outlook on ethnic relations than people in both Estonia and Latvia. Based on one study conducted in 1993,²¹⁰ more than eighty percent of both ethnic Lithuanians and the Russian minority considered ethnic relations to be “good”. As an interesting side note, only sixty seven percent of the Polish minority in Lithuania shared the same sentiment, an indication towards Lithuanians' troubled relations with the Poles. In terms of the way the government treats the Russian minority; seventy seven percent of ethnic Lithuanians and seventy four of the Russian minority deemed that the government treated the Russian minority “fairly” (note the similar percentages in both groups, which is something that is lacking in both Estonia and Latvia). Finally, around forty percent of ethnic Lithuanians and nineteen percent of the Russian minority believed that there was a possibility of future ethnic conflict between the two groups. In this regard, Lithuania is tied with Latvia while painting a considerably more positive picture than Estonia.

Even though Lithuania has been more successful in maintaining

²¹⁰ Steen, “Ethnic Relations, Elites and Democracy in the Baltic,” pp. 77-78.

harmonious ethnic relations, this does not mean that the Russian minority in Lithuania is free of problems. In Lithuania, as is the case in the other two Baltic states, the Russian minority has been unable to make much of a headway in gaining top positions in the state apparatus.²¹¹ This is down to two factors: 1) the passivity (as in being uninterested in engaging in state affairs) and socio-economic background (for example low levels of education) of the Russian minority, and 2) discrimination done by the Lithuanian (as well as Estonian and Latvian) elites. This discrimination is done on the grounds of historical suspicion and ethnic sentiments: the elites are reluctant in hiring the Russian minority to key positions and instead prefer members of the titular majority.²¹² At the same time, the Russian minority to a certain extent exaggerates the situation when they attribute all of their problems to inter-ethnic hostility. Many of the problems the Russian minority has faced since the beginning of 1990s is down more to the transition from socialism to capitalism than to other factors.²¹³ The Baltic states' transformation from socialist states into capitalist states have at times created unfavorable conditions for certain segments of society, including the Russian minority.

3.5. THE CITIZENSHIP POLICIES OF ESTONIA AND LATVIA

As stated previously, Estonia and Latvia followed a different route than that of Lithuania when they regained their independence following the collapse of

²¹¹ Steen, "Accessioning Liberal Compliance...", pp. 194-195.

²¹² Steen, "Ethnic Relations, Elites and Democracy in the Baltic," pp. 84.

²¹³ Simonian, "The Russian Diaspora...", p. 84.

the Soviet Union. Unlike Lithuania's inclusive approach to the situation, Estonia and Latvia chose an exclusive one. Estonia and Latvia were primarily concerned with removing anything that had to do with the around fifty years of past Soviet rule. What Estonia and Latvia did was essentially “de-Sovietization”; the opposite of the Sovietization policy of the Soviet Union.²¹⁴ This “de-Sovietization” involved removing Soviet symbols, dismantling Soviet political institutions, and ousting Soviet representatives from positions of power in the political and social sphere. In their places these states designed states institutions and enacted policies that emphasized the titular majorities; the Estonians and the Latvians. Among such policy were their citizenship policies. Although their policies on citizenship are not the same, they bear a lot of similarity in their overall character, and therefore Estonia and Latvia will be dealt together within this context.

One of the first things both Baltic states did following the end of the Soviet rule was to bring back the constitutions that were in effect prior to the Soviet occupation.²¹⁵ Estonia enacted an expanded version of its 1920 Constitution, while Latvia restored its 1922 Constitution without any alterations. This was done as a way of demonstrating to everyone that Estonia and Latvia were not newly established states, but states that had re-gained their independence following an illegal occupation. As stated earlier, these two states would use this argument to evade international criticisms over their citizenship policies.

²¹⁴ Ardivino, “Imagined Communities...,” pp. 8-9.

²¹⁵ Galbreath, “The Politics of European Integration...,” p. 38. Also see; Gelazis, “The European Union and the Statelessness Problem...,” p. 228.

3.5.1. Estonia's Policies

Following the enactment of the 1920 Constitution, Estonia went on to reinstate on November 1991 its Citizenship Law that it had originally enacted in 1938 (amended in 1940).²¹⁶ According to this reinstated law, Estonian citizenship was only extended to those who had already been citizens of Estonia prior to June 16, 1940, and to the descendants of these original citizens. At the same time, this law in effect automatically excluded from citizenship those who had immigrated during the Soviet rule and the descendants of these immigrants. Citizenship would be automatically granted to those who had immigrated during the Soviet rule only if they could prove that they had been supportive of Estonia's struggle to become an independent state. In order to prove that they had been supportive they had present to the authorities their Congress of Estonia membership cards, the Congress of Estonia being the official name of the Estonian independence movement.²¹⁷

Next on the chronological scale was Estonia's 1992 Constitution.²¹⁸ This constitution granted non-citizens a series of social rights that to a certain extent mirrored the social rights of citizens. Non-citizens were granted the right to health care; the right to receive financial assistance in case of old age, inability to work,

²¹⁶ Gelazis, "The European Union and the Statelessness Problem..." p. 231.

²¹⁷ *Ibid.* p. 231.

²¹⁸ Steen, "Accessioning Liberal Compliance..." p. 196. Also see; Gelazis, "The European Union and the Statelessness Problem..." pp. 230-231.

or the loss of a family's income earner; and also the right to receive special assistance for families with many children or disabled members. Additionally, this constitution granted one political right: non-citizen permanent residents were able to vote in local elections. Such extensive rights for non-citizens were an indication of Estonia's plan to exclude large segments of the population from citizenship. By granting such rights to non-citizens Estonia hoped to evade international criticism, but as shall be discussed later on in this chapter, it was going to be unsuccessful in this regard.

The non-citizens' right to vote in local election did not amount to much by itself, because the Election Law of May 1993 prohibited non-citizens from running for office in local elections.²¹⁹ Furthermore, this law put forth the rule that candidates for the office of mayor must be fluent in Estonian. In essence, non-citizens (the Russian minority) had the right to elect officials on a local level, but did not have the right run for office on the same level. This meant that the Russian minority had limited options in voicing their thoughts and concerns in local matters. Their best chance in this regard was to elect an Estonian who was sympathetic to their situation, if such a candidate was even present.²²⁰ Going beyond the local level, the Russian minority was completely barred from state-wide politics, as they had neither the right to elect nor the right to be elected in general elections.

²¹⁹ Steen, "Accessioning Liberal Compliance...", p. 196.

²²⁰ Lottmann, "No Direction Home...", pp. 510, 516.

In 1992 Estonia also enacted a new citizenship law.²²¹ The Russian minority in the country were excluded from citizenship on the grounds that they had immigrated to Estonia during the illegal Soviet occupation. According to the law, non-citizens were required to pass a language examination that would assess their level fluency in Estonian. Those who failed to pass this exam were required to prove ten years of “legal” residency in Estonia before being eligible to apply for citizenship again. With the July 1993 Law on Aliens,²²² members of the Russian minority who possessed Soviet passports were faced with another problem; they were required to apply for residency within one year. Those who did not apply in time would be faced with deportation. There were additional problems regarding this law: 1) Even if one did apply for residency, there was the chance that the application could be rejected, which meant possible deportation, 2) one could only apply for temporary residency of five years, meaning one could never be sure if the next application would be accepted, 3) the law contained many vague terms that were open to interpretation, which gave the Estonian state the opportunity to interpret the law in the most conservative sense so as to exclude members the Russian minority from being eligible for residency.

In January 1995 Estonia passed a revised citizenship law which repeated what had been previously indicated by Estonia; that citizens of Estonia prior to the Soviet rule were automatically entitled to citizenship in the modern day Estonia.

²²¹ Steen, “Accessioning Liberal Compliance...,” pp. 196-197.

²²² *Ibid.* p. 197. Also see; Galbreath, “The Politics of European Integration...,” p. 43.

In addition to this, the law laid down new rules for its naturalization process.²²³ Individuals wishing to become citizens had; 1) to be a permanent resident of Estonia for five years, 2) to have command of the language, history, and national anthem of Estonia, 3) be knowledgeable in the basic principles of the Estonian constitution, and be knowledgeable in the rights and obligations of individuals as laid down by the constitution. 4) to provide proof of a legal source of income. In terms of the language examination, individuals had to demonstrate proficiency in the Estonian language with their reading, speaking, and writing skills on everyday topics. The law also had some further conditions.²²⁴ One such condition was that dual-citizenship was prohibited; therefore members of the Russian minority could not be citizens of Russia and Estonia at the same time. Another condition was that Estonian citizenship would not be granted to persons who had “acted against the Estonian state and its security,” and who had been/still is a member of foreign intelligence or security services. This last condition was obviously targeted at members of the former Soviet army and KGB (the Soviet intelligence agency) stationed in Estonia. But the part about “acting against the Estonian state and its security” was an open-ended statement, and Estonia could apply it to a wide variety of cases as it saw fit.

Lastly, the Law on Language, as amended in December 1998, required that members of parliament and representatives in local government to be proficient in

²²³ Gelazis, “The European Union and the Statelessness Problem...,” pp. 229, 232.

²²⁴ *Ibid.* p. 232.

Estonian.²²⁵ The proficiency that was required in this regard was in the level same level as that expected in the private sector and non-governmental organizations. Additionally, the law prohibited the use of other languages, and made Estonian the obligatory language in public signs, advertisements, notices, and election posters.

3.5.2. Latvia's Policies

Following the enactment of the 1922 Constitution, Latvia went on to reinstate on August 1991 its Citizenship Law that it had originally enacted in 1919 (amended in 1927).²²⁶ The law granted automatic citizenship to individuals who had been citizens of Latvia prior to 1940 and the descendants of these individuals. At the same time the law proclaimed that the 1940 USSR Law on Citizenship to be null and void, whereby all those who had acquired citizenship through this way (mostly the Russian minority) were stripped of their citizenship. The Russian minority in Latvia was suddenly made stateless with the passing of this citizenship law. Furthermore, Russian minority (having been barred from citizenship) was unable to vote or to be elected in both local and general elections. This was because non-citizen residents of Latvia were not given the right to vote or to be elected. In this case, Latvia was even more restrictive on the Russian minority than Estonia.

²²⁵ Steen, "Accessioning Liberal Compliance...", p. 197.

²²⁶ Gelazis, "The European Union and the Statelessness Problem...", p. 228.

On July 1994 Latvia enacted a new citizenship law.²²⁷ The law repeated what had been stated before; that pre-1940 citizens of Latvia and their descendants were entitled to citizenship. The law also contained special provisions to encourage ethnic Latvians living abroad to return back to Latvia. Furthermore, individuals who were entitled to automatic citizenship were not required to renounce their other citizenship. Additionally, unlike the Russian minority, ethnic Estonians and ethnic Lithuanians who had immigrated to Latvia during the Soviet rule were made eligible for citizenship. The July 1994 Citizenship Law was, in essence, making it easy for everyone but the Russian minority to acquire Latvian citizenship.

The July 1994 Citizenship Law also laid down the rules for naturalization. The conditions for naturalization laid down by this law were basically the same as what was laid down by Estonia's January 1995 citizenship law. Unlike Estonia's law, however, Latvia's law made a detailed list of who would be barred from naturalization:²²⁸

- Those who “turned against the Republic of Latvia’s independence, its democratic parliamentary state system or the existing state authority in Latvia, ...”;
- Those who have “stirred ethnic hatred or racial discord through the propagation of fascist, chauvinist, national-socialist, communist, or other

²²⁷ Gelazis, “The European Union and the Statelessness Problem...,” p. 229.

²²⁸ *Ibid.* p. 229.

totalitarian ideas”;

- Those who had been officials of foreign states (what was in Latvia's mind was the Soviet Union), and those who have been members of the armed forces and police of foreign states;
- Those who been in any way connected to the KGB or any other foreign intelligence agency;
- Those who have participated in attempts to stop Latvia's independence movement.

Even though it had passed a naturalization law, Latvia at the same time wanted to limit the number of people who applied for citizenship. In order to achieve this aim Latvia instituted a “window system” in which prospective citizens were to be allowed to apply for citizenship at different times.²²⁹ This would basically subject the naturalization process of non-Latvians to various phases. Latvia divided prospective citizens into eight different groups based on their age and whether or not they were born in Latvia. To give an example from this system, the first group was comprised of individuals who were born in Latvia and were between the ages of 16 and 20. This first group was to be allowed to begin their naturalization process on January 1, 1996. The eighth group was comprised of individuals who were born outside of Latvia and who were above the age of 30. This group could only begin their naturalization process on January 1, 2003; nearly thirteen years after the enactment of the 1994 citizenship law.

²²⁹ Gelazis, “The European Union and the Statelessness Problem...,” pp. 229-230. Also see; Steen, “Accessioning Liberal Compliance...,” p. 198.

Lastly, Latvia passed its Language Law on July 1999.²³⁰ The law prohibited the use of Russian both in the public sphere and in private businesses. In a similar fashion to Estonia, Latvia required that all officials in bureaucratic and political institutions to be proficient in Latvian. The law also required that all documents submitted to Latvian government agencies to be in Latvian. Furthermore, discussions in private business meetings were required to be translated into Latvian if one of the parties requested such a translation.

3.5.3. The Domestic Consequences of Estonia's and Latvia's Policies

Both Estonia and Latvia in theory provide opportunities for individuals to become citizens through their naturalization processes. But in practice this process has become problematic for the Russian minority living in both of the Baltic states. The problem stems from the fact that this group of people are at a significant disadvantage when it comes to the examination portion of the naturalization process.²³¹ The level of proficiency required to pass the language examination is too high for many members of this community. The Russian minority in Estonia and Latvia often live in a segregated fashion from ethnic Estonians and Latvians. The language of daily interaction (from everyday life to business) amongst the Russian minority is Russian, and therefore they do not get the chance to practice Estonian and Latvian. For this reason their proficiency in Estonian and Latvian never progresses to the level required by the naturalization

²³⁰ Steen, "Accessioning Liberal Compliance...", p. 198.

²³¹ Lottmann, "No Direction Home...", p. 510.

process unless they make a special effort (such as taking expensive language courses)²³² to improve their language proficiency to that required level.

Moving beyond the language requirement, the Russian minority has faced problems with other aspects of the examination procedure as well. For example, they have to pass civics and history examinations comprised of questions that go into excessive details;²³³ details that most people, including ethnic Estonians and Latvians, would never know. This includes questions that expect people to know details such as the dimensions of the Estonian flag or the first Estonian actor who played the role of Hamlet. The level of knowledge required to pass such stringent examinations, combined with the fees that have to be paid for the naturalization process,²³⁴ have caused many in the Russian minority to become frustrated with whole ordeal of acquiring citizenship. Thus, many members of this community have simply opted out of citizenship and have remained as permanent residents,²³⁵ even though in reality they would want to become citizens in order to live better lives in Estonia and Latvia.

Estonia's and Latvia's actions regarding their citizenship policies created a negative impression on the Russian minority living in these two Baltic states. Estonia and Latvia were making it clear to the Russian minority they were not

²³² Lottmann, "No Direction Home...", p. 511.

²³³ *Ibid.* p. 512.

²³⁴ Ardivino, "Imagined Communities...", p. 9.

²³⁵ Lottmann, "No Direction Home...", p. 511.

welcome in Estonia and Latvia.²³⁶ It did not matter that the Russian minority had been a part of Estonia and Latvia for the past fifty years; because they were a forcefully introduced foreign element that reminded the titular majorities of a humiliating and traumatic past. Faced with such a hostile treatment, the Russian minority has had three choices: to integrate with the titular majorities, to become assimilated into the titular majorities, or to leave Estonia and Latvia.

Leaving Estonia and Latvia is not an attractive option for the Russian minority.²³⁷ They have made their lives in Estonia and Latvia for the past sixty years, for most of them Estonia and Latvia is the only place they can call home. Although they are ethnically and culturally linked to Russia, and Ukraine and Belorussia as well, Russia has over time to a certain extent become alien to them.²³⁸ Furthermore, they know that even in their present state they get to enjoy a higher standard of living than what would be possible for them back in Russia.²³⁹ And lastly, the Russian minority has over time created business and everyday-life networks in Estonia and Latvia;²⁴⁰ to go back to Russia would mean having to recreate those crucial and vast networks all the way from the beginning again.

Integration is not an attractive option either. This is because Estonia and Latvia do not want the Russian minority to integrate. To allow the Russian

²³⁶ Steen, "Accessioning Liberal Compliance...", p. 197.

²³⁷ *Ibid.* p. 193.

²³⁸ Simonian, "The Russian Diaspora...", pp. 77, 79-80.

²³⁹ *Ibid.* pp. 76, 80.

²⁴⁰ Lottmann, "No Direction Home...", p. 512. Also see; Simonian, "The Russian Diaspora...", p. 79.

community to integrate would be to affirm Russian minority as an important partner in the running of Estonia and Latvia. What Estonia and Latvia really want is for the Russian minority to assimilate,²⁴¹ to become like the titular majorities. Their state policies are designed to contain and to curtail Russian cultural and political influence, and their naturalization processes are stringent enough that only the most determined individuals are able to fulfill them. In this way, only those who are truly loyal to the state (to put it in other words, those that have become like the titular majorities through assimilation) are eligible to become citizens.²⁴² Those who are not determined enough to pass the naturalization process (those who not become properly assimilated) are barred from citizenship and prevented from influencing the running of Estonia and Latvia.

Despite what Estonia and Latvia want, however, assimilation is not an attractive option for the Russian minority either. The years that have passed since collapse of the Soviet Union have shown that the Russian minority does not assimilate; they continue to persist as a minority group despite their current predicament.²⁴³ Furthermore, attempts to assimilate the Russian minority only create further inter-ethnic tension within Estonia and Latvia.

In the end, the Russian minority living in Estonia and Latvia has neither left Estonia and Latvia, nor has it been integrated or assimilated. These people

²⁴¹ Steen, "Accessioning Liberal Compliance...", p. 193.

²⁴² Lottmann, "No Direction Home...", p. 516. Also see; Steen, "Ethnic Relations, Elites and Democracy in the Baltic," pp. 74, 84.

²⁴³ Simonian, "The Russian Diaspora...", p. 80.

have been stuck somewhere in the middle; in a legal, political, and social limbo. Apart from a small portion who have by now become naturalized, the remaining portion of the Russian minority either have no citizenship whatsoever (and who are stuck with permanent or temporary residency), or are citizens of Russia. There is also small segment of the Russian minority who have no citizenship whatsoever, but also have no possibility of acquiring citizenship. This segment, dubbed the “truly stateless”, are comprised of the members of the former Soviet army and KGB, and individuals who are known to have worked in any sort of fashion against the independence movements of Estonia and Latvia.²⁴⁴ Interestingly; remaining stateless is at times a strategic move for the Russian minority.²⁴⁵ The Russian minority, due to their historical background, have family and cultural ties in both Russian and Estonia/Latvia. Making note of the on-going animosity between Russia on the one hand, and Estonia and Latvia on the other; to abstain from acquiring either side's citizenship is to remain neutral between the two feuding sides. As non-citizens who have not demonstrated allegiance to either side, the Russian minority is able to have an easier time crossing borders, and as such an easier time maintaining their cross-border family and cultural ties.

Like in the case of Lithuania, the state of inter-ethnic relations in Estonia and Latvia are evident from the results of studies that were previously mentioned in the case of Lithuania. For example, in terms of elites' perception, Estonian and Latvian elites have a more negative view of ethnic relations than Lithuanian

²⁴⁴ Lottmann, “No Direction Home...,” p. 509.

²⁴⁵ *Ibid.* p. 513.

elites.²⁴⁶ Concerning the question of whether or not an ethnic confrontation was likely, Estonian elites' responses had a mean of 3.1 in the year 1994, and 3.3 in 1997. For Latvian elites, these figures were 3.7 in 1993, and 3.5 in 1997. This means that both Estonian and Latvian elites considered ethnic confrontation to be somewhere between likely and unlikely (but closer to unlikely). Concerning the question of what kind of confrontation would occur if a confrontation was indeed to occur, Estonian elites' responses had a mean of 2.5 in 1994, and 2.6 in 1997. For Latvian, these figures were 2.5 in 1993, and 2.7 in 1997. This means Estonian and Latvian elites believed that a possible ethnic confrontation would probably occur in the form of rhetoric rather than in the form of violence. It can be concluded from Estonian and Latvian elites' answers that they acknowledged that there was ethnic tension within their country, but that they assumed that this tension would be expressed in peaceful terms.

In terms of the perspective of the general population, people in Estonia and Latvia have a more negative view of ethnic relations than people in Lithuania.²⁴⁷ For example, fifty percent of ethnic Estonians and seventy four percent of the Russian minority considered ethnic relations to be “good”. In Latvia, these figures were sixty two percent for both ethnic groups. In terms of the way the government treats the Russian minority; seventy two percent of ethnic Estonians and only twenty nine percent of the Russian minority deemed that the government treated the Russian minority “fairly”. For Latvia, these figures were fifty nine percent for

²⁴⁶ Steen, “Ethnic Relations, Elites and Democracy in the Baltic,” pp. 75-77.

²⁴⁷ *Ibid.* pp. 77-78.

ethnic Latvians, and only twenty eight percent for the Russian minority. Finally, around sixty nine percent of ethnic Estonians and thirty one percent of the Russian minority in Estonia believed that there was a possibility of future ethnic conflict between the two groups. In Latvia, these figures for forty percent for ethnic Latvians, and twelve percent for the Russian minority. As is evident from the figures, there is a discrepancy between the way the titular majorities and the Russian minority view the ethnic-relations situation in both Estonia and Latvia. As an example, while a majority of the titular majorities consider that the Russian minority is treated fairly (and a large portion of the Russian minority think the opposite), a larger percentage of the titular majorities (vs. the Russian minority) still assume that a future ethnic conflict is possible. This is perhaps an indication that the titular majorities assume that they will experience problems with the Russian minority no matter how accommodating they might try to be.

3.5.4. The International Community's Response, and Estonia and Latvia's Policy Changes

The international community did not remain silent as Estonia and Latvia went about enacting their citizenship policies. The European Union, Council of Europe, Organization for Security and Co-operation in Europe (OSCE), and the North Atlantic Treaty Organization (NATO) all provided feedback on how Estonia and Latvia were performing in terms of democratic standards.²⁴⁸ The organization that is most important in our case is the EU, as it was the most influential

²⁴⁸ Steen, "Accessioning Liberal Compliance...", pp. 195-196.

organization from the perspective of Estonia and Latvia. As states wishing to become members of the EU; Estonia and Latvia had to demonstrate to the EU that they were will willing and able to conform to the standards of the EU.²⁴⁹ The consequence of not conforming to the EU's standards would have been being barred from membership. Despite the fact that it was in the best position to pressure Estonia and Latvia to change, the EU nevertheless worked alongside the other organizations to exert pressure on these two Baltic states.²⁵⁰

Upon feeling the pressure from the international community, Estonia and Latvia made changes to their citizenship policies. They were, however, slow and stubborn when it came to making changes in this matter.²⁵¹ The reason as to why Estonia and Latvia were slow and stubborn to change their policies was due to what was previously stated in this chapter; Estonia and Latvia initially sought to rebuild themselves as ethnically homogenous societies by filtering out the Russian minority. The way to achieve this was through establishing ethnic democracies that would automatically exclude the Russian minority from being eligible for citizenship. At the same time, however, Estonia and Latvia sought membership in the EU. It was clear from feedback of the EU that Estonia and Latvia would not be able to become members if they insisted in carrying on as ethnic

²⁴⁹ Gelazis, "The European Union and the Statelessness Problem..." p. 239. Also see; David J. Galbreath, "European Integration through Democratic Conditionality: Latvia in the Context of Minority Rights," *Journal of Contemporary European Studies*, 14, 1, (2006): pp. 69-87, pp. 82, 85.

²⁵⁰ Galbreath, "European Integration through Democratic Conditionality..." p. 82.

²⁵¹ Galbreath, "The Politics of European Integration..." p. 48.

democracies.²⁵² Estonia and Latvia were thus stuck between two options: changing their citizenship policies to appease the EU, or making sure that the titular majorities continued to hold the upper hand against the Russian minority.²⁵³ Appeasing the EU meant that Estonia and Latvia would have to let go of their goal of establishing ethnic democracies, while clinging onto the goal of establishing ethnic democracies meant that Estonia and Latvia would lose the chance to become EU members.

In the end, Estonians and Latvians decided that EU membership was more important than establishing ethnic democracies. From the mid-1990s and onwards, the hardline elements in Estonia and Latvia began to lose their persuasive power over the Estonian and Latvian public, and were consequently pushed to the sidelines.²⁵⁴ Meanwhile the more moderate elements were forced to make strategic compromises in order to make sure that Estonia and Latvia would become EU members. Factoring in all the available options; what Estonia and Latvia came up with were the following:²⁵⁵ 1) Changing citizenship policies so that they would conform with the EU standards at a minimum level;²⁵⁶ which

²⁵² Steen, "Accessioning Liberal Compliance...", p. 199. EU's main feedback mechanism was EU Commission's annual reports on both Estonia and Latvia. The next chapter will mention such reports in more detail.

²⁵³ Steen, "Accessioning Liberal Compliance...", p. 201.

²⁵⁴ *Ibid.* p. 193.

²⁵⁵ *Ibid.* p. 205.

²⁵⁶ EU's membership criteria indicate that candidate states must have "stable institutions that guarantee democracy, the rule of law, human rights and respect for and protection of minorities." Estonia's and Latvia's citizenship issue can be considered to be a democratic problem. Estonia and Latvia needed to make reforms to demonstrate that they were committed to solving their citizenship problem and improving their democracy. By making such reforms, both states would be able to satisfy EU's standards at a minimum level. This is an issue that will be dealt in more detail in the next chapter. EU's membership criteria can be accessed from:

meant making naturalization much more accessible for the Russian minority, 2) Maintaining the principle of keeping the Russian minority under control at the face of international pressure, 3) Accepting those who have successfully naturalized (and thus who have been assimilated). By adopting these three approaches, Estonia and Latvia gradually transformed themselves from ethnic democracies into ethno-liberal democracies.²⁵⁷ By becoming ethno-liberal democracies; Estonia and Latvia were able to maintain the dominance of the titular majorities while at the same providing more accessible naturalization process that satisfied at a minimum level the demands of the EU.

Faced with international pressure, Estonia and Latvia made the following changes regarding their citizenship policies:

Both states ceased to refer to the Russian minority as illegal immigrants, and began to refer to them as long-term residents (but still regarded them in the immigrant category). Despite this, however, they refused to recognize the Russian minority as an official minority group.²⁵⁸

Both states had originally required ten years of residency before individuals could be deemed to eligible for citizenship. This requirement was reduced by half to five years in the case of both states.

European Commission, "Conditions for Enlargement," *European Commission* website, (http://ec.europa.eu/enlargement/the-policy/conditions-for-enlargement/index_en.htm), accessed December 16, 2011.

²⁵⁷ Steen, "Accessioning Liberal Compliance...", p. 191.

²⁵⁸ *Ibid.* p. 193.

Both Estonia and Latvia changed their citizenship laws to allow the children of non-citizens born after the end of the Soviet rule to apply for citizenship without being required take the language examination.²⁵⁹ Additionally, Latvia lifted the requirement for taking the written part of the language exam for those over the age of 65.²⁶⁰ Estonia on the other hand, has done this for those born prior to January 1, 1930.²⁶¹ This is not useful for many people today, since one would have to be 81 years old in order to have this requirement lifted for them.

Following international criticism for demanding that members of parliament and representatives in local government to be proficient in Estonian, Estonia decided to divide language examinations in this matter into three levels, beginners, intermediate, and advanced, and reduced the fees for such examinations.²⁶²

Estonia has by now made examinations of the naturalization process free of charge. Additionally, it reimburses the cost of language courses for those who manage to pass the examinations of the naturalization process.²⁶³ Latvia, on the other hand, reduces or waives the fee for the examinations for more than fifty

²⁵⁹ Galbreath, "Still Treading Air...", p. 93.

²⁶⁰ "Citizenship in Latvia," *Ministry of Foreign Affairs of the Republic of Latvia* website, (<http://www.mfa.gov.lv/en/policy/4641/4642/4651/>), accessed June 28, 2011.

²⁶¹ "Citizenship," *Estonia.eu: Official Gateway to Estonia* website, (<http://estonia.eu/about-estonia/society/citizenship.html>), accessed February 3, 2012.

²⁶² Steen, "Accessioning Liberal Compliance...", p. 197.

²⁶³ Estonia.eu: Official Gateway to Estonia, "Citizenship".

percent of all applicants based on their income levels.²⁶⁴

Like Latvia, Estonia had originally planned to keep out the Russian minority from the state's political affairs. But following the pressure from the international community, Estonia agreed to grant resident non-citizen the right to vote in elections, but stopped short of granting them the right to run for office in local elections.

Constituting a rare case of leniency towards members of the former Soviet army, Estonia agreed to allow these individuals to acquire permanent residency.²⁶⁵

Following significant international criticism regarding its Law on Aliens, Estonia decided to add a one year extension to the application deadline for residency.²⁶⁶ Additionally, it is now possible for non-citizens to acquire permanent residency.²⁶⁷

Latvia had originally considered placing an annual quota for its naturalization process in order to limit the number of people that could acquire citizenship each year. But facing international pressure, this idea was dropped right from beginning. What Latvia adopted instead was the window system as was previously mentioned. This window system, however, was eventually eliminated

²⁶⁴ Ministry of Foreign Affairs of Latvia, "Citizenship in Latvia".

²⁶⁵ Galbreath, "The Politics of European Integration..." p. 43.

²⁶⁶ *Ibid.* p. 43.

²⁶⁷ Estonia.eu: Official Gateway to Estonia, "Citizenship".

as well in 1998 following continued international pressure.²⁶⁸

Latvia adopted on April 1995 a law on the “Status of Former USSR Citizens who have Neither Latvian nor Other States’ Citizenship”.²⁶⁹ This law only applied those who were eligible for the naturalization process, and as such it excluded all those categories of individuals that the July 1994 citizenship law had excluded. The April 1995 law indicated that non-citizen residents registered with the government are entitled to enjoy the same rights as Latvian citizens based on the constitutional law on the “Rights and Obligations of a Person and a Citizen”. Resident non-citizens also have the right to travel freely, and bring their spouses and dependents into Latvia. Furthermore, they are allowed to maintain their native language and culture, and have the right to receive translation services in court proceedings. And lastly, resident non-citizens will not be expelled or exiled from Latvia unless due to a certain law or if another state agrees to accept them.

By the end of the 1990s, both Estonia and Latvia initiated social integration programs that primarily focused on the issue of language.²⁷⁰ These programs aimed to help the Russian minority learn Estonian and Latvian, and thus integrate (or rather assimilate into) Estonian and Latvian culture. But at the same time, these programs discouraged bilingualism in the titular majorities because the Russian minority was expected to become bilingual.

²⁶⁸ Galbreath, “The Politics of European Integration...,” pp. 44, 46.

²⁶⁹ Gelazis, “The European Union and the Statelessness Problem...,” p. 230.

²⁷⁰ Steen, “Accessioning Liberal Compliance...,” p. 193. Also see; Galbreath, “Still Treading Air...,” p. 93.

In 1992 Estonia began to hand out temporary travel documents to non-citizens that allowed them to travel in and out of the state. Such travel documents however did not offer any kind of diplomatic protection to the non-citizens. Starting from 1995, however, both Estonia and Latvia began to hand out non-citizen passports that allowed non-citizens of Estonia and Latvia to freely travel around the world. In contrast to the travel document, non-citizen passports even provided diplomatic protection to the non-citizens.²⁷¹

With such policies and policy changes enacted by Estonia and Latvia the Russian minority has, over time, acquired various rights that have to a certain extent resembled the rights normally only a citizen would get to enjoy. All these rights that have been granted, however, do not solve the problem of the large non-citizen population in Estonia and Latvia. In fact, these rights that have been granted undermine the efforts to reduce the number of non-citizens. This is because such rights allow non-citizens to comfortably live and work in Estonia and Latvia, and thus acquiring citizenship ceases to be much of a necessity.²⁷²

3.5.5. The Implications of Estonia's and Latvia's EU Accession

It was with such methods that Estonia and Latvia were able to, at a minimum level, satisfy the demands of the EU, and become its members in 2004. By this time, however, about twelve percent of the total population of Estonia, and

²⁷¹ Gelazis, "The European Union and the Statelessness Problem..." pp. 237, 239. Also see; Lottmann, "No Direction Home..." p. 508.

²⁷² Gelazis, "The European Union and the Statelessness Problem..." p. 239.

about twenty two percent of the total population of Latvia was still without citizenship (most of which were the members of the Russian minority).²⁷³ As of December 2011, about seven percent of Estonia was still without citizenship.²⁷⁴ As of March 2011, about fourteen percent of Latvia was still without citizenship.²⁷⁵ The fact that such a large proportion of people in both states remain without citizenship is fundamentally undemocratic,²⁷⁶ because they cannot fully engage in the affairs of these two states without becoming citizens. And since becoming an EU citizen is dependent on first being a citizen of one of the member states, non-citizens are barred from enjoying the benefits of the EU that the remaining population of Estonia and Latvia has so far been able to enjoy.²⁷⁷

With the acquisition of EU membership, and having put twenty years behind in the post-Soviet era, the arguments for still keeping the Russian minority out of citizenship have become much less convincing.²⁷⁸ The argument that the Russian minority lack a proper connection to Estonia and Latvia can no longer be maintained, for the Russian minority has chosen to stay in these two states without citizenship even they knew fully well that they could have easily acquired Russian citizenship had they moved to nearby Russia. The argument that the Russian minority would somehow jeopardize the political goals of Estonia and Latvia can

²⁷³ Gelazis, "The European Union and the Statelessness Problem..." p. 225.

²⁷⁴ Estonia.eu: Official Gateway to Estonia, "Citizenship".

²⁷⁵ "Population Census 2011 – Key Indicators," *Central Statistical Bureau of Latvia* website, (<http://www.csb.gov.lv/en/statistikas-temas/population-census-2011-key-indicators-33613.html>), accessed February 3, 2012.

²⁷⁶ Gelazis, "The European Union and the Statelessness Problem..." pp. 239-240.

²⁷⁷ *Ibid.* p. 225.

²⁷⁸ *Ibid.* p. 240.

no longer be maintained either, for by now both states are fully integrated into the EU (and other important organizations such as NATO). Nor can Estonia and Latvia maintain the argument that the Russian minority endanger the culture and language of Estonia and Latvia; for the EU as a whole threatens to exert a much more significant cultural influence than the Russian minority ever can.

Estonia and Latvia claim, however, that their citizenship policies are in line with international standards, and that they are fully in support of decreasing the number of individuals who are without citizenship in their territories.²⁷⁹ Furthermore, they claim that Estonian and Latvian citizenship have become much more appealing since Estonia and Latvia became EU members. People want to experience the benefits of EU citizenship, and thus have since 2004 applied in greater numbers for Estonian and Latvian citizenship. This has resulted in, both Estonia and Latvia indicate, more fifty percent of the Russian minority in Estonia and Latvia to acquire citizenship.²⁸⁰

In any case, however, the lack of citizenship of a notable portion of Estonia's and Latvia's population is an ongoing problem, a problem that has become a lot tougher to solve now that both states are EU members.²⁸¹ The EU can no longer exert pressure on Estonia and Latvia by threatening to not admit them into the union. Having become members, and thus having achieved their

²⁷⁹ Estonia.eu: Official Gateway to Estonia, "Citizenship". Also see; Ministry of Foreign Affairs of Latvia, "Citizenship in Latvia".

²⁸⁰ *Ibid.*

²⁸¹ Lottmann, "No Direction Home...", p. 516.

ultimate goal, there isn't anything left to motivate Estonia and Latvia to change their policies. As such, from the perspective of promoting democracy, the EU has made a critical mistake by admitting Estonia and Latvia as members without first making sure that they solved their citizenship problem. Lithuania, unlike Estonia and Latvia, enacted inclusive policies that enabled the Russian minority to become part of the citizenry of Lithuania. As such Lithuania never presented the kind of problem (from the perspective of promoting democracy) that Estonia and Latvia have. As such Lithuania has, from the very beginning, exemplified the route Estonia and Latvia should have taken when they went about forming their citizenship policies.

3.6. CONCLUSION

This chapter has focused on the citizenship policies of the Baltic states after they reestablished themselves as independent states following the collapse of the Soviet Union.

After the Baltic states regained their independence, they behaved differently towards the large Russian minority that had settled in these states during the Soviet occupation. The behavior of the Baltic states was grounded on their experiences during the Soviet occupation. All three Baltic states were subjected to cultural suppression and forced population transfers that brought in the Russian minority. In Lithuania, ethnic Lithuanians managed to maintain their dominant majority position despite the population transfers. Lithuanians felt secure with their position after Lithuania regained its independence. Furthermore,

they did not fear the influence of the Russian minority because they were small in size in comparison to ethnic Lithuanians. For these reasons, Lithuanians felt no need to curtail the influence of the Russian minority in the re-independent Lithuania. Lithuanians thus went ahead to establish a liberal democracy with an inclusive citizenship policy that granted citizenship to the Russian minority. Due to Lithuania's accommodating stance towards the Russian minority, ethnic relations between Lithuanians and the Russian minority developed along positive lines.

In Estonia and Latvia ethnic Estonians and Latvians lost their dominant majority position due to the population transfers. Estonians and Latvians viewed the Russian minority as an uncomfortable reminder of the Soviet occupation. They felt vulnerable against the large Russian minority living amongst them, and viewed them as a potential threat that could influence Estonia and Latvia at expense of Estonians and Latvians. For these reasons, Estonians and Latvians aimed to establish ethnic democracies that would employ exclusive citizenship policies meant to filter out Russian minority's influence. Due to Estonia's and Latvia's unaccommodating stance towards the Russian minority, ethnic relations between the titular majorities and the Russian minority have developed in a more negative manner than in Lithuania.

All three Baltic states wished to become EU members. During its bid to become an EU member, Lithuania did not experience difficulty in regards to its citizenship policy. Its citizenship policy was an inclusive one, and was thus in line

with EU's standards from the beginning. Estonia and Latvia, however, experienced difficulties on this issue because their citizenship policies were exclusive in their nature. Their policies needed to be more inclusive in order to conform to EU standards. At the same time, however, Estonians and Latvians insisted on establishing ethnic democracies in order to continue curtailing the Russian minority's influence. At the end, however, EU membership was deemed to be more important than establishing an ethnic democracy. Estonia and Latvia thus made their citizenship policies more inclusive by making the naturalization process much more accessible. Unlike before, members of the Russian minority now had a more reasonable chance to complete the naturalization process. By providing a realistic albeit still difficult process through which the Russian minority could acquire citizenship, Estonia and Latvia thus transformed themselves into ethno-liberal democracies. It was through this transformation that Estonia and Latvia managed to achieve two goals: 1) Become EU members by adopting more inclusive citizenship policies, 2) Maintain the dominant position of ethnic Estonians and Latvians through a strict naturalization process that ensure that those who became citizens are properly assimilated into the titular majorities' culture.

All three Baltic states became EU members, but they became EU members under different domestic circumstances. Lithuania was in conformity with the EU from the beginning because of its inclusive approach to the Russian minority, and thus became an EU member without having to deal with the kind of citizenship problem that Estonia and Latvia had to deal with. Estonia and Latvia provided a

mechanism through which the Russian minority could acquire citizenship, but this did not solve the citizenship problem of the Russian minority. In the end, Estonia and Latvia managed to become EU members without truly solving this citizenship problem.

The next and final chapter of this thesis will use the findings of this current chapter to give an answer to the following question: do the citizenship policies of the Baltic states conform to the EU framework?

CHAPTER IV:

EVALUATION OF THE CITIZENSHIP POLICIES

4.1. INTRODUCTION

The purpose of this chapter is to evaluate whether or not the citizenship policies of the Baltic states conform to the European Union framework. In case of Lithuania the answer is simple: yes, its citizenship policy does conform to the EU framework. Having adopted an inclusive citizenship policy from the beginning, Lithuania was in line with the EU framework from the beginning. Estonia and Latvia, on the other hand, posed a problem because they had initially adopted exclusive citizenship policies. Through the accession process, Estonia and Latvia were pushed to make reforms in their citizenship policies. These reforms, however, did not solve the citizenship problem of the Russian minority. Estonia and Latvia became EU members in 2004 while a noticeable portion of the Russian minority was still without citizenship. Furthermore, the lack of citizenship continues to be a problem for the Russian minority even though seven years have passed since Estonia's and Latvia's EU accession. Estonia's and Latvia's citizenship policies do not conform to the EU framework because; 1) They became EU members without truly solving the citizenship problem of the Russian minority, 2) They still have not been able to eliminate this citizenship problem.

In order to explain in detail why Estonia and Latvia do not conform to the

EU framework, we must examine EU's basic principles, and also its conception of citizenship. Furthermore, we must attempt to bring an explanation as to why the EU was willing to accept two states that did not fully comply with its membership conditions. We must examine why the EU chooses to enlarge, and what it hoped to gain or accomplish by incorporating Estonia and Latvia.

4.2. EU'S BASIC PRINCIPLES AND ITS CONCEPTION OF CITIZENSHIP

The European Union clearly sets out its basic principles in the Treaty on European Union. Clause 1 of Article 6 states: “The Union is founded on the principles of liberty, democracy, respect for human rights and fundamental freedoms, and the rule of law, principles which are common to the Member States.”²⁸² These are the principles upon which the EU is based, they are also the principles which member states must conform to.

Unlike its basic principles, EU's conception of citizenship is not strictly outlined in any document. It can be said, however, that EU's conception of citizenship is based on the liberal democratic tradition. This liberal democratic tradition has been transferred to the EU through the founding members of the

²⁸² “Consolidated Version of the Treaty on European Union,” *EUR-Lex: Access to European Union law* website, (http://eur-lex.europa.eu/en/treaties/dat/12002M/htm/C_2002325EN.000501.html#anArt6), accessed December 16, 2011.

union. In time this liberal democratic tradition has become a part of EU itself.²⁸³ Evidence of EU's liberal democratic character can be clearly seen in the way the Estonia and Latvia moved away from an ethnic democratic model to a more liberal model in order to conform to the EU.

In their original forms, Estonian and Latvian citizenship policies were based on the attempt to exclude the Russian minority based simply on the fact that they were Russian. Faced with EU's and international organizations criticisms, Estonia and Latvia decided to let go of such a blatantly exclusive approach. Through their interaction with the EU, Estonia and Latvia gave the Russian minority the opportunity to become citizens on the condition that they pass a series of examinations. These examinations were designed to determine just how familiar they were with Estonia's and Latvia's language, history, and culture. Through further interaction with the EU, Estonia and Latvia changed the excessively hard nature of these examinations, and made them easier to pass. In short, the attainment of citizenship became a more realistic goal for the Russian minority. Through such a process, Estonian and Latvian citizenship policies ceased to be exclusive on ethnic grounds, and became more inclusive by adopting examination-based procedures.

The change Estonia and Latvia went through thus reflect EU's liberal democratic model; which bases its citizenship on the idea of inclusiveness. In this

²⁸³ Dimitry Kochenov, "Rounding Up the Circle: The Mutation of Member States' Nationalities Under Pressure from EU Citizenship," *RSCAS EUI Working Papers*, 23, (2010): pp. 1-2, 9, 16.

context, inclusiveness means that the attainment of citizenship is based on fair rules, and not on an individual's background such as ethnicity, religion, or language. For the EU then, inclusive citizenship does not mean that all non-citizens in country should become citizens; but that there should be a realistic opportunity for non-citizens to fulfill the conditions necessary for citizenship.

Despite the reforms they have so far enacted, however, Estonia and Latvia are not liberal democracies. As outlined in Chapter I and Chapter III, these two states are ethno-liberal democracies. Their democracies are neither as exclusive as ethnic democracies, nor are they as inclusive as liberal democracies. As ethno-liberal democracies, they have provided a realistic opportunity for naturalization, but have not solved the citizenship problem of the Russian minority. Based on its failure to solve the citizenship problem in Estonia and Latvia, the ethno-liberal model of democracy does not conform to the EU's framework. Estonia's and Latvia's citizenship policies are derived from their problematic (within the EU framework) ethno-liberal model of democracy. As it will be explained next, these policies are still at odds with EU's basic principles and its conception of citizenship.

4.3. THE IMPLICATIONS OF ESTONIA'S AND LATVIA'S CITIZENSHIP POLICIES

4.3.1. Current Implications

Estonian and Latvian citizenship policies are no longer as exclusive as they were when these two states regained their independence. Through reforms Estonian and Latvian citizenship policies have become more inclusive by making it easier for the Russian minority to fulfill the conditions necessary for citizenship. This, however, has not yet been enough to eliminate the citizenship problem in Estonia and Latvia. In order fully partake in the democratic mechanisms of a state, an individual is required to possess that state's citizenship. The Russian minority is still experiencing citizenship problems, and is thus still experiencing problems in fully partaking in Estonia's and Latvia's democratic mechanisms.

Moving beyond democratic mechanisms, the lack of citizenship is also a problem in terms of EU citizenship. EU citizenship is conferred automatically upon those who possess citizenship of any of the member states of the EU. EU citizenship allows individuals to enjoy the many benefits that come with being a part of the EU. Such benefits include²⁸⁴: being able to move freely and reside anywhere in the EU, being able to vote and stand in local and EU elections in the country of residence, being able to receive diplomatic and consular protection in territories outside of the EU from any EU member, being under EU protection

²⁸⁴ European Commission, "EU Citizenship," *European Commission* website, (http://ec.europa.eu/justice/citizen/index_en.htm), accessed December 16, 2011.

from any kind of discrimination. Citizens of Estonia and Latvia are free to enjoy such benefits. Members of the Russian minority lacking Estonian and Latvian citizenship, however, are barred from enjoying such benefits.

The EU indicates that it is up to each member state to determine the ways in which one can acquire the citizenship of that state.²⁸⁵ It can be argued that being EU members, and as such being free to determine their citizenship policies, Estonia and Latvia do not pose a problem for the EU when it comes to the issue of the Russian minority. We can argue against this, however, by indicating that the EU currently has member states who have still not remedied the bureaucratic and cultural impediments that keep some of its people from partaking not only in Estonia's and Latvia's democratic mechanisms, but also in EU's mechanisms. Estonia and Latvia have still not become truly inclusive in terms of their citizenship policies, which means that they still contradict EU's inclusive notion of citizenship and democracy. Therefore, in terms of democracy, it must be concluded that Estonia and Latvia to a certain extent violate the basic principles of the EU.

4.3.2. Implications at the Time of Estonia's and Latvia's EU Accession

Moving beyond the current situation posed by Estonia and Latvia, the fact that Estonia and Latvia were unable to solve their citizenship problem prior to accession poses another problem for the EU. This shall be explained by examining

²⁸⁵ European Commission, "EU Citizenship".

what the EU has explicitly stated about its conditions for prospective EU members.

The EU has over time determined the conditions which a candidate state must fulfill before being eligible to join the EU. The EU most recently determined its conditions for membership in 1993 at the European Council meeting in Copenhagen. These conditions came to be known as the Copenhagen Criteria, or also as the membership criteria. The membership criteria indicate that a candidate state must have “stable institutions that guarantee democracy, the rule of law, human rights and respect for and protection of minorities.”²⁸⁶ The European Council meeting that took place in Madrid in 1995 further clarified the Copenhagen Criteria. It indicated that a candidate state must have the ability to put the rules and procedures it adopted from the EU into effect. The EU indicates:

“While it is important for EU legislation to be transposed into national legislation, it is even more important for the legislation to be implemented and enforced effectively through the appropriate administrative and judicial structures. This is a prerequisite of the mutual trust needed for EU membership.”²⁸⁷

This means that simply adopting policies to comply with EU standards are

²⁸⁶ European Commission, “Conditions for Enlargement,” *European Commission* website, (http://ec.europa.eu/enlargement/the-policy/conditions-for-enlargement/index_en.htm), accessed December 16, 2011.

²⁸⁷ European Commission, “Conditions for Enlargement”.

not enough by themselves; there must be concrete results so as to satisfy EU's membership criteria.

As was mentioned in the previous chapter, the EU Commission observes candidate states and reports on their progress through annual reports. The purpose of these reports is to inform both the EU's decision makers and also the candidate states as to whether or not the candidate states are having concrete results in satisfying EU's membership criteria. The Commission's annual reports up until 2003 have consistently drawn attention to the fact that Estonia and Latvia needed to take more steps to remedy the citizenship problem of the Russian minority.²⁸⁸ The last annual reports prior to Estonia's and Latvia's EU accession were the 2003 reports. In the 2003 report for both states, the Commission makes only short mention of the citizenship problem of the Russian minority.²⁸⁹ The Russian minority problem is mentioned as an integration issue, and that both Estonia and Latvia are “encouraged” to accelerate the Russian minority's integration process. As was previously indicated, however, Estonia and Latvia still had not resolved

²⁸⁸ European Commission, “2002 Regular Report on Estonia's Progress Towards Accession,” *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/archives/pdf/key_documents/2002/ee_en.pdf), accessed December 16, 2011, pp. 19-20, 34. Also see; European Commission, “2002 Regular Report on Latvia's Progress Towards Accession,” *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/archives/pdf/key_documents/2002/lv_en.pdf), accessed December 16, 2011, pp. 18-19, 35.

²⁸⁹ European Commission, “Comprehensive monitoring report on Estonia's preparations for membership,” *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/archives/pdf/key_documents/2003/cmr_ee_final_en.pdf), accessed December 16, 2011, p. 35. Also see; European Commission, “Comprehensive monitoring report on Latvia's preparations for membership,” *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/archives/pdf/key_documents/2003/cmr_lv_final_en.pdf), accessed December 16, 2011, p. 36.

their citizenship problems by the time of their accession. There was also no dramatic reduction in the percentage of people without citizenship from 2002 to 2003.

While it must be admitted that neither Estonia nor Latvia were in any way abusing the Russian minority, it cannot be denied that they still had not remedied their citizenship problem at the time of their accession. Reforms were made, and mechanisms were put in place to help the Russian minority acquire citizenship. At the same time, however, a noticeable portion of the Russian minority was still barred from fully partaking in the democracies of Estonia and Latvia at the time of the accession.

In terms of membership criteria then, Estonia and Latvia pose a problem for the EU because they became EU members without fully complying with these membership criteria. By allowing Estonia and Latvia to join prior to them fully complying with EU's criteria, the EU has implicitly indicated that its membership criteria can to certain extent be ignored. There is a discrepancy between what the EU explicitly states about the membership criteria, and what it implicitly indicates about them through its actions. Estonia and Latvia were technically required to prove that they had solved their Russian minority issue. In the end, however, the EU decided that Estonia's and Latvia's semi-successful efforts were “good enough” for the EU.

4.4. THE EU'S RATIONALE BEHIND ALLOWING FOR ESTONIA'S AND LATVIA'S ACCESSION

4.4.1. The EU's Rationale for Enlargement

In order to understand why the EU behaved the way it did in regard to Estonia and Latvia, we must first understand why the EU chooses to enlarge. Speaking in general terms, the EU enlarges to protect Europe from itself, and from the outside world. The EU is a unique political and economic system which breeds integration among the various European states. This integration process works through the various differences among the European states to create a Europe with common values and goals. By making Europeans work together in such a way, the EU thus strives to promote peace, stability, and prosperity in Europe.²⁹⁰ History has shown that the alternative to the EU is European fragmentation; which either culminates in overt conflict such the First and Second World Wars, or frozen conflict such as the Cold War.²⁹¹ Therefore, the EU seeks to protect Europe from damaging itself by preventing European fragmentation.

The EU also enlarges to increase its political and economic weight in the world. The EU started off as a community of six states with a population of less than two hundred million people. In around sixty years, the EU has enlarged to

²⁹⁰ “The accession process for a new Member State,” *Europa: Summaries of EU legislation* website, (http://europa.eu/legislation_summaries/enlargement/ongoing_enlargement/114536_en.htm), accessed December 16, 2011.

²⁹¹ Damien Chalmers and Adam Tomkins, *European Union Public Law: Text and Materials*, (New York: Cambridge University Press, 2007), p. 39.

become a union of twenty seven states with a population of more than five hundred million people. By allowing for the free movement good, workers, services, and capital; by using uniform economic guidelines, and by mostly using the same currency (the euro), the member states of the EU have combined create the world's largest economic zone.²⁹² This allows the EU to remain competitive in an increasingly competitive global economy.

Moving beyond economics, the EU creates the potential for most of Europe to move as one large and influential bloc in global political affairs. The word “potential” has been used specifically because the EU has been much more successful in global economic affairs than it has been in global political affairs. The EU is still unable act in unison in political affairs.²⁹³ As an example, EU members fail to agree on how to behave against EU's neighbors: while Germany and France view Russia as an important trade partner and treat Russia in conciliatory manner, the Baltic states view Russia with suspicion and call upon the EU to take security measures against Russia. Furthermore, France and Germany have no problems with selling advanced military hardware to or establishing military training facilities in Russia. Such moves are obviously completely against the interests of the Baltic states. Such disunity amongst EU members is a consequence the way EU as an organization has developed over

²⁹² “Enlargement strategy 2006-2007: challenges and integration capacity,” *Europa: Summaries of EU legislation* website, (http://europa.eu/legislation_summaries/enlargement/ongoing_enlargement/e50025_en.htm), accessed December 16, 2011.

²⁹³ Marko Papić, “Europe on Edge: No More United States of Europe,” *The Cutting Edge* website, (<http://www.thecuttingedgenews.com/index.php?article=52304>), accessed December 25, 2011.

time.²⁹⁴ EU has prioritized economic integration from its inception because European states have historically found it easier to agree upon economic matters than political matters. As such, political integration has been designated as the last step towards a full-fledged European integration. The ambivalence regarding EU's political integration is readily apparent from the way EU's official website *Europa.eu* fails to comment much on how enlargement has strengthened EU as a political bloc. At the same time, however, each new enlargement increases EU total population and territorial size. Once political integration is achieved, the EU should be utilize its increase size in order assert itself more easily in global political affairs.

In sum, by creating a large economic and political bloc, the EU allows Europe to more easily assert itself globally. Through the creation and maintenance of such a large bloc, the EU seeks to protect Europe from the outside world.

Estonia and Latvia acceded to the EU as a part of the 2004 enlargement which incorporated ten states, eight of which were from Central and Eastern Europe (CEE). This enlargement was undertaken for reasons that reflected EU's general goals for enlargement.

The end of the Cold War and the collapse of the Soviet Union meant that

²⁹⁴ Nicholas Moussis, "8. Towards a political union in Europe," *Europedia.moussis.eu* website, (http://europedia.moussis.eu/books/Book_2/3/8/index.tkl?all=1&pos=96), accessed December 25, 2011.

the states of Central and Eastern Europe were free from Soviet influence, and free to pursue their own interests. But as states emerging from autocratic regimes and going into a transition period, such states were at the risk of experiencing political, social, and economic instabilities that could have negative consequences for peace in Europe. These states looked at the EU for help, and it was in the EU's interest to help them.²⁹⁵ The EU sought to encourage these states to pursue a process of democratization because such a process would help stabilize these states. At the same time the CEE states sought EU membership in order to guarantee a better future for themselves. For this reason, the CEE states were committed to conform with the EU's membership criteria. The case of Estonia and Latvia provides an example for this EU-CEE states interaction.

In order to conform with the EU's membership criteria, Estonia and Latvia had to make reforms in their citizenship policies. As explained earlier, these reforms made their citizenship policies more inclusive. More inclusive citizenship policies naturally provided opportunities for the Russian minority to partake in the democratic mechanisms of Estonia and Latvia. Therefore, this reform process helped alleviate the condition of the Russian minority living in Estonia and Latvia. Left to their own devices Estonia and Latvia could have clung to their exclusionary policies, which could have pushed the disgruntled Russian minority to violent confrontation with Estonians and Latvians. As the case of Estonia and

²⁹⁵ "The 2004 enlargement: the challenge of a 25-member EU," *Europa: Summaries of EU legislation* website, (http://europa.eu/legislation_summaries/enlargement/2004_and_2007_enlargement/e50017_en.htm), accessed December 16, 2011.

Latvia shows; the European Union used the EU candidacy process to spread its values and goals onto Central and Eastern European states, and succeeded in making these states resemble itself. Therefore, this process served to fulfill EU's goal to protect Europe from itself.

The 2004 enlargement also served to protect Europe from the outside world. Incorporating ten new states brought in seventy five million people into the European Union; which meant an increased labor force, new markets ripe for investment and trade, and new states in which the euro could be adopted. This boosted EU's economic competitiveness, increased the relevancy of the euro, increased the EU's size and weight as an economic zone. These improvements helped to make the EU even more prominent in the global economy.²⁹⁶ This naturally meant that EU was able to better assert itself in economic affairs; which served to promote EU's goal to protect Europe from the outside world.

4.4.2. A Special Rationale for Enlargement: European Reunification

Beyond the aforementioned goals, the 2004 enlargement also served one other important purpose: European reunification.²⁹⁷ The two main reasons for enlargement that have been elaborated up until now are based on a utilitarian perspective; the EU benefits from each successive wave of enlargement by preventing European conflict and by increasing EU's political and economic

²⁹⁶ European Commission, "The Policy," *European Union Commission* website, (http://ec.europa.eu/enlargement/the-policy/index_en.htm), accessed December 16, 2011.

²⁹⁷ Europa: Summaries of EU legislation, "The 2004 enlargement".

weight. The goal for European reunification, however, was not based on utilitarian grounds. The goal of European reunification was based on a value-based perspective; the EU viewed Central and Eastern Europe as an inherent part of the European community.²⁹⁸ From the perspective of the EU the states of Central and Eastern Europe were forcefully removed from the European community by the Soviet Union, and placed in an opposing camp during the Cold War. With the collapse of the Soviet Union the artificial separation that existed in Europe came to an end. It was time to bring CEE states back into the European community. By identifying these states as being inherently related to itself, the EU felt compelled help them and bring them into the union.

The EU's willingness to help was not just about being prepared to assist CEE states during their transition periods. The EU was also prepared to bear burden of incorporating into the union these states which were in no way as socially stable and economically advanced as the older members of the union.²⁹⁹ Estimates done before the 2004 enlargement indicated that both in the short and in the medium term any economic gains the EU was to have from enlargement would be offset by the costs associated with enlargement. Economic gains of enlargement would theoretically manifest themselves only in the long run. Furthermore with the 2004 enlargement the EU was to move its borders further east into Europe, right next to unstable regions such as Russia and former

²⁹⁸ Helene Sjursen, "Why Expand? The Question of Legitimacy and Justification in the EU's Enlargement Policy," *Journal of Common Market Studies*, 40, 3, (2002): pp. 491-513, pp. 502-503, 508.

²⁹⁹ Sjursen, "Why Expand..." pp. 491, 497.

Yugoslavia. As such, the 2004 enlargement entailed both potential political and economic costs. In the end, however, candidate states' willingness to fulfill the membership criteria coupled with the goal of European reunification motivated EU member states to put aside their objections against the 2004 enlargement.

Article 49 of the Treaty on European Union indicates that “Any European State which respects the principles set out in Article 6(1) may apply to become a member of the Union.”³⁰⁰ As was previously mentioned in this chapter, the Article 6(1) that is referred to here outlines the basic principles of the EU. Fulfillment of EU's membership criteria are an indication that a candidate state adheres to the basic principles of the EU. Adherence to these principles is necessary in order for any candidate state to be eligible for EU membership. Adherence to these principles, however, is not sufficient for a candidate state to become an EU member. The EU always reserves the right to decide whether or not it is willing to incorporate a candidate state into the union. Throughout this candidacy process, the EU seems to prioritize certain candidate states over others.³⁰¹ Even though all candidate states express their willingness to fulfill the membership criteria, the EU spends more energy assisting those candidate states that fits its interests.

This was the case with the states that became EU members with the 2004 enlargement. Estonia, Latvia, and the other six CEE states all received special attention from the EU during candidacy process. The EU as a whole made it clear

³⁰⁰ EUR-Lex: Access to European Union law, “Treaty on European Union”.

³⁰¹ Sjursen, “Why Expand...,” pp. 492, 508.

that the EU and the CEE states were inherently part of the same European community. For example, former European Commissioner Frans Andriessen had indicated as early as 1991 that EU's aim was to overcome European division, and that the peoples of Central and Eastern Europe aspired to *rejoin* Europe.³⁰² In a series of speeches addressed at CEE states in 1997, former European Commissioner Hans van den Broek remarked that they were all “profoundly European nation[s]”.³⁰³ Finally, in the words of former Spanish prime minister Felipe Gonzales, the EU had a “moral obligation to let [the CEE states] in.”³⁰⁴

Moving beyond motivational statements, the EU also channeled more financial support to these states during their candidacy process than it did to candidate states such as Turkey. A comparison of the financial support Poland and Turkey received during their candidacies serves to illustrate this point. Poland was the largest and most populous candidate state amongst the 2004 Enlargement states, and thus received the biggest share of EU's financial support. In order to help it conform to the EU's membership criteria, Poland received 402.8 million euros in 2003.³⁰⁵ In the same year Turkey, roughly twice the size and population of Poland, only received 145.1 million euros.³⁰⁶

³⁰² Sjurson, “Why Expand...,” p. 503.

³⁰³ *Ibid.* p. 503.

³⁰⁴ *Ibid.*

³⁰⁵ “Phare Programme Types,” *European Commission* website, (http://ec.europa.eu/enlargement/how-does-it-work/financial-assistance/phare/programmes_types_en.htm), accessed December 26, 2011.

³⁰⁶ “TR2003-005-667.01 to 07 - Turkey National programme,” *European Commission* website, (http://ec.europa.eu/enlargement/fiche_projet/document/TR2003-005-667.01_to_07_-_Turkey)

Both in terms of moral and financial support, the case of Turkey highlights how the EU's behavior changes from one candidate state to another.

4.5. DIFFERENT TREATMENT FOR DIFFERENT CANDIDATE STATES

Turkey was a candidate state during the candidacy phase of Estonia and Latvia. Just like all the other candidate states, Turkey too expressed its commitment to fulfilling EU's membership criteria. Despite this its expressed commitment, Turkey did not receive the kind of encouragement that CEE states received.³⁰⁷ From the beginning Turkey's bid to become an EU member has been met with opposition from various groups and member states within the EU. Opposition has been centered on whether or not Turkey is even a European state, and the various problems that arise out of Turkey's size.³⁰⁸ Opponents against Turkey's membership hold the opinion that Turkey is of a different cultural background than European states, and thus cannot be considered to be part of the European community. As such, the EU has never felt towards Turkey the kind of obligation it has felt towards the CEE states. Never truly considered to be a part of Europe, Turkey's potential membership comes to be seen from a utilitarian perspective. As such, the argument becomes what Turkey as a member state will add and detract from the EU.³⁰⁹

[National programme.pdf](#)), accessed December 26, 2011, p. 1.

³⁰⁷ Sjursen, "Why Expand...", p. 505.

³⁰⁸ Robert Pahre and Burcu Uçaray-Mangıtlı, "The Myths of Turkish Influence in the European Union," *Journal of Common Market Studies*, 47, 2, (2009): pp. 357-384, p. 358.

³⁰⁹ Sjursen, "Why Expand...", p. 504.

Turkey's size comes to play a key role in this utilitarian perspective. Unfortunately for Turkey, its size makes it a problem for many in the EU. As a developing state with a population second only to the EU member Germany, Turkey has caused fears that it will put too much economic strain on the EU. Furthermore, it is believed that due to its size Turkey will have too much weight in the EU and undermine the position of other EU members.³¹⁰ A large developing state in need of much more extensive political, social, and economic reforms than any of the CEE states; Turkey nevertheless received less financial support from the EU than they received.³¹¹ As was mentioned before, this is to be attributed to EU's interests; Turkey was not in its priority list and therefore did not receive the same level of support as other candidates states received.

With the goal of European reunification in mind, the EU paid extra attention to the CEE states. Beyond the extra attention, the desire to see Europe reunited also made EU to be more flexible in terms of the union's membership criteria. Evidence for this can be seen in the case of Estonia and Latvia: these two states became members while they were still experiencing a Russian minority problem. Estonia and Latvia are not the only examples of the EU being flexible with its membership criteria. The cases of Romania and Bulgaria provide additional examples for EU's flexible approach.

Romania and Bulgaria became EU members in 2007, and they are

³¹⁰ Pahre, "The Myths of Turkish Influence..." p. 358.

³¹¹ Sjursen, "Why Expand..." pp. 505, 508.

considered to be in the same wave of enlargement as Estonia and Latvia. For Romania and Bulgaria, one of the biggest obstacles in their way towards EU membership was corruption.³¹² Corruption constituted both a political and an economic problem that needed to be combated in order for Romania and Bulgaria to fully satisfy the membership criteria. Just as in the case of Estonia and Latvia, however, Romania and Bulgaria became EU members without solving their corruption problem. Evidence for this can be clearly seen from the reports about rampant corruption that still persisted after Romania's and Bulgaria's accession to the EU.³¹³ EU's motivation for incorporating these two states can again be explained in terms of European reunification. Romania and Bulgaria, just like Estonia and Latvia, are considered to be inherently a part of the European community. Just like Estonia and Latvia, Romania and Bulgaria too were under the Soviet Union's influence during the Cold War. As such, Romania and Bulgaria constituted two more cases of states that had to be brought back to the European community.

4.6. THE EU'S ABSORPTION CAPACITY

It can be argued that the EU could afford to incorporate Estonia, Latvia,

³¹² European Commission, "Communication from the Commission: Monitoring report on the state of preparedness for EU membership of Bulgaria and Romania", *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/pdf/key_documents/2006/sept/report_bg_ro_2006_en.pdf), accessed December 15, 2011, pp. 4-5, 9-10.

³¹³ "Bulgaria and Romania face EU sanctions over corruption", *EurActiv.com* website, (<http://www.euractiv.com/enlargement/bulgaria-romania-face-eu-sanctions-corruption/article-172451>), accessed December 15, 2011. Also see; Valentina Pop, "Corruption in Bulgaria and Romania still unpunished, EU says", *EUobserver.com* website, (<http://euobserver.com/9/32643>), accessed December 15, 2011.

Romania, and Bulgaria even when they did not truly comply with EU's membership criteria. This is related to EU's absorption capacity: the capacity to incorporate new member states without disrupting its ability to pursue further integration.³¹⁴ In other words new member states must not disrupt the stability the union, and that the EU must assess whether or not it can fully integrate the new member state into the union's mechanisms. With a combined population of about three and half million people, Estonia and Latvia did not represent a challenge for the EU to integrate. The same can be partially said in the case of Bulgaria and Romania, the combined population of which was about twenty seven million people at the time of accession. The EU deemed that these four relatively small states could be absorbed into the union once they fulfilled the membership criteria.

The same cannot be said in the case of Turkey. Turkey, with a population of about seventy five million people, is as populous as all the ten member states of the 2004 enlargement combined. It represents much more of a challenge for integration than any of the member states of the 2004 and 2007 enlargements. Furthermore, EU has by now incorporated twelve new member states. As such Turkey seeks to accede to a union that is still trying to fully integrate twelve new member states with a combined population of more than one hundred million people. Although the European Commission assesses the recent enlargements in a

³¹⁴ Europa: Summaries of EU legislation, "The accession process". Also see; Europa: Summaries of EU legislation, "Enlargement strategy 2006-2007".

positive manner,³¹⁵ the EU is currently suffering from “enlargement fatigue”.³¹⁶ public uncertainty over EU's future and its capacity to pursue further integration, and a lack of public belief that the enlargement process is beneficial for the existing member states. In other words, the EU has for now lost its public support for another major enlargement. Combined with these facts is the fact that Turkey is not regarded by the EU member states as being inherently part of the European community. As such, unlike Estonia or Latvia, Turkey faces an EU that will not be flexible in terms of EU's membership criteria.³¹⁷

4.7. THE EU'S UNIQUE NATURE AND ITS IMPLICATIONS

As can be surmised from the case put forth by Estonia's and Latvia's EU accession, there is a discrepancy in the way EU is meant to enlarge and the way EU actually enlarges. As outlined by the membership criteria, and monitored by the EU Commission; candidate states must not only make reforms to conform to the membership criteria, but must also demonstrate that these reforms lead to concrete results. As the case of Estonia and Latvia proves, however, the EU can be flexible when it comes to determining whether or not the membership criteria are being complied with.

In this sense neither the 2004 nor the 2007 EU enlargements constitute a

³¹⁵ “Commission seeks public support for further enlargement,” *EurActiv.com* website, (<http://www.euractiv.com/enlargement/commission-seeks-public-support-further-enlargement-news-499594>), accessed December 16, 2011.

³¹⁶ Deniz Devrim and Evelina Schulz, “Enlargement Fatigue in the European Union: From Enlargement to Many Unions,” *Elcano Royal Institute Working Paper*, 13, (2009): pp. 1, 3-4.

³¹⁷ Devrim, “Enlargement Fatigue...,” pp. 5-6

unique case. The EU has always to a certain extent improvised when it comes to enlargement. There has always been a difference between what has been written down as rules for enlargement, what has been done in practice.³¹⁸ Throughout its expansion from a six member union into a twenty seven member union, the EU has always determined rules through which it could enlarge. These rules, however, only serve as guidelines which the EU interprets as befits its interests. With each enlargement, the EU has built upon its enlargement practice. In time, what has been written down as rules and what is done in practice has become two interlinked parts of the way the EU actually enlarges. Based on this, it can be said that Estonia's and Latvia's EU accession are simply two examples for EU's flexible approach to enlargement.

EU's flexible approach to enlargement can be attributed to its unique supranational nature. There has never been anything like the EU in history; it is a unique organization that is neither a state or an international organization.³¹⁹ At the same time, however, it bears certain similarities to both states and international organizations. Like a state it has its own currency, flag, anthem, citizens; and legislative, executive, and judicial organs. Unlike a state, however, its citizens are firstly citizens of individual states which guide the union according to their interests. Like an international organization it is established by sovereign states for the purpose of dealing with issues no single state can handle individually.

³¹⁸ Dimitry Kochenov, "EU Enlargement Law: History and Recent Developments: Treaty - Custom Concubinage?" *European Integration Online Papers*, 9, 6, (2005): pp. 1-2, 21.

³¹⁹ Chalmers, *European Union Public Law...*, p. 3.

Unlike an international organization, however, it has an unprecedented ability to impose its regulations on member states; an imposition which to a certain extent reduces members' sovereignty. Being such a unique supranational organization, the EU has nothing to refer to but itself. It sets its own examples for itself to follow. With each new problem it adapts and finds a solution that fits its interests. Therefore, its flexible approach to enlargement is simply a manifestation of how it pursues its interests.

4.8. CONCLUSION

The purpose of this chapter was to evaluate whether or not the citizenship policies of the Baltic states conform to the EU framework. In case of Lithuania, the answer was simple; yes, its citizenship policy conforms to the EU framework. In terms of Lithuania, the question was easy to answer because it had adopted an inclusive approach to citizenship once it re-established itself as an independent state. As such, from the very beginning Lithuania's citizenship policy conformed to the EU framework.

The case of Estonia's and Latvia's citizenship policies needed a more detailed answer. Estonia and Latvia had adopted an exclusive approach to citizenship after they had re-established themselves as independent states. Through reforms done for the sake of EU accession, Estonia and Latvia moved towards a more inclusive approach towards citizenship. Despite reforms, however, the Russian minority living in Estonia and Latvia were still experiencing a citizenship problem when these two states become EU members. As such,

Estonia's and Latvia's citizenship policies did not conform with the EU framework at the time of the accession. The Russian minority's citizenship problem persists to this day. Therefore, these two states citizenship policies still do not conform to the EU framework.

EU's primary motivation for allowing Estonia and Latvia to accede was related to EU's desire to reunite Europe after the Cold War. For sake of European reunification, the EU was willing to accept Estonia's and Latvia's partial conformity with EU's membership criteria. The fact that these two states were relatively small helped their case for accession since they would be easy to integrate into the EU. The case of Bulgaria and Romania provided additional examples for EU's flexible approach to enlargement. Like Estonia and Latvia, Bulgaria and Romania benefited both from being considered to be a part of the European community, and also from being relatively small. Turkey provided an example for a candidate state to which the EU will not adopt a flexible approach. Its size and its identity make the EU public uneasy, which makes the EU take a sterner stance.

In the end, the examples provided by these five states point to the fact that EU enlargement is much more than about candidate states fulfilling the membership criteria. Each enlargement is unique; both because the EU continues to evolve, which leads to changed perception about how the EU should move ahead; and also because EU reacts differently to each candidate state based on that state's unique characteristics.

CONCLUSION

This thesis has sought to evaluate whether or not the citizenship policies of the Baltic states conform to the European framework. Based on its evaluation, it has concluded that Lithuania's citizenship policies conform to the European framework. Estonia's and Latvia's citizenship policies, however, do not conform to the European framework.

Chapters I, II, and III have provided the necessary background information for Chapter IV. Chapter I provided an account of citizenship and nationalism. Citizenship has been explained as being a complex and evolving term that is both open to interpretation and subject to change throughout time. Nationalism is a powerful ideology that mobilizes nations to seek independence. An account of citizenship allows the reader to better understand what is meant when talking about citizenship policies. An account of nationalism allows the reader to better understand why the Baltic states sought independence and why the Baltic people considered the Russian minority to be an unwelcome foreign element.

Chapter II provided an account of the history of the Baltic states. Of most importance it explained how the Baltic states were subject to a russification policy during the Soviet rule, and how this policy had a drastic effect on the ethnic composition of Estonia and Latvia. It has been due to this different historical

experience that Estonia's and Latvia's approach towards the Russian minority has differed from Lithuania's approach.

Chapter III provided an account of citizenship policies of the Baltic states. It showed that Lithuania's citizenship policy was inclusive towards the Russian minority from the start, and therefore did not create a problem for the Lithuania during its EU candidacy. Estonia and Latvia initially insisted on exclusive citizenship policies that prevented the Russian minority from acquiring citizenship. Faced with the prospect of being barred from EU membership if they insisted on maintaining exclusive citizenship policies, Estonia and Latvia enacted reforms that served two purposes: 1) Maintain the dominant position of ethnic Estonians and Latvians in Estonia and Latvia, 2) Provide an accessible but tough naturalization process for the Russian minority that would satisfy the EU. It was within such a context that Estonia and Latvia became EU members alongside Lithuania even though the states had failed to truly solve the citizenship problem of the Russian minority.

Finally, Chapter IV evaluated the citizenship policies of the Baltic states. In its analysis it referred to the EU's liberal democratic tradition and membership criteria. Lithuania had chosen to become a liberal democracy from the start by granting citizenship to the Russian minority. Due to its inclusive approach Lithuania did not experience a democratic shortcoming in regards to the Russia minority, and was therefore in line with membership criteria of the EU. Through reforms Estonia and Latvia transformed themselves into ethno-liberal

democracies. Although they provided a mechanism for naturalization, they did not truly solve the citizenship problem of the Russian minority. They nevertheless became EU members even though their semi-inclusive democracies were not in line with the inclusive liberal democratic tradition of the EU. Furthermore, the unresolved nature of the citizenship problem of the Russian meant that Estonia and Latvia did not meet EU's membership criteria minority at the time of their accession. The fact that citizenship problem of the Russian minority is an ongoing issue means that Estonia and Latvia still do not meet EU's membership criteria.

Based on these conclusions, Chapter IV proceeded to analyze why the EU was willing allow two states to become its members even though they did not meet EU's standards. In this regard, EU was motivated by the ideal of European reunification. The EU considered Estonia and Latvia, along with the other CEE states, to be natural members of the same European family as that of the EU. The Cold War had separated this European family into two, and with the Cold War now over it was time to bring the two parts of Europe back together. Estonia and Latvia were not in line with EU's standards, but they were small enough for EU to integrate without undermining its stability. This was true for the case of Bulgaria and Romania as well, which were two other CEE states that were included in Europe's drive to reunify Europe. Estonia, Latvia, Bulgaria, and Romania provided an example of EU's flexible approach to enlargement. These four states benefited both from being considered in the European family, and from being small enough to be integrated without causing stability issues for the EU. The EU encouraged these states toward membership, and was lenient towards these states

in terms of EU's membership criteria. Turkey, another candidate state at the time of Estonia's and Latvia's candidacy, provided another example of EU's flexible approach. Turkey was not considered to be a part of the European family, and raised concerns among EU circles over its large size. As such, the EU did not encourage Turkey like it did the CEE states, and applied its membership criteria in a strict manner. Therefore, the cases of Turkey and the CEE states demonstrated not only EU flexible approach to enlargement, but also its behavior that varied from one candidate state to another.

Based on the above conclusion, Chapter IV proceeded to indicate that there is a discrepancy between what the EU has written down about enlargement, and what it does in practice about enlargement. Chapter IV attributes this to EU unique supranational nature. As a unique organization the EU has no example to follow but itself. It therefore places rules such as its membership criteria that act as guidelines. It interprets these guidelines based on its current goals and ongoing problems, and thus behaves in a flexible manner towards enlargement. It can be concluded from this thesis that in the future the EU will continue to act in this flexible manner towards enlargement. It will continue to place down rules for enlargement, only to flexibly interpret them as it sees fit based on the candidate states at hand, but also based on what it seeks to accomplish for its future.

BIBLIOGRAPHY

- Anderson, Benedict, (2006) *Imagined Communities*, (London: Verso).
- Ardovino, Michael, (2009) "Imagined Communities in an Integrating Region Baltic Region," *Demokratizatsiya*, 17, 1, pp. 5-17.
- Aston, Charlotte, (2010) *Antonius Piip, Zigfrids Meierovics and Augustinas Voldemaras: The Baltic States*, (London: Haus Publishing Ltd).
- Bellamy, Richard, (2008) *Citizenship: A Very Short Introduction*, (Oxford: Oxford University Press).
- Brubaker, William Rogers, (1994) "Immigration, Citizenship, and the Nation-State in France and Germany: A Comparative Historical Analysis," in *Citizenship: Critical Concepts – Volume II*, ed., Bryan Turner and Peter Hamilton (London: Routledge).
- Burchell, David, (2002) "Ancient Citizenship and its Inheritors," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications).
- Chalmers, Damien, and Adam Tomkins, (2007) *European Union Public Law: Text and Materials*, (New York: Cambridge University Press).
- Dagger, Richard, (2002) "Republican Citizenship," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications).
- Delanty, Gerard, (2002) "Communitarianism and Citizenship," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications).
- Devrim, Deniz, and Evelina Schulz, (2009) "Enlargement Fatigue in the European Union: From Enlargement to Many Unions," *Elcano Royal Institute Working Paper*, 13.
- Dzyuba, Ivan, (1974) *Internationalism or Russification? A Study in the Soviet Nationalities Problem*, (New York: Monad Press).
- European Commission, (2011) "EU Citizenship," *European Commission website*, (http://ec.europa.eu/justice/citizen/index_en.htm), accessed December 16, 2011.

- European Commission, (2011) "The Policy," *European Union Commission* website, (http://ec.europa.eu/enlargement/the-policy/index_en.htm), accessed December 16, 2011.
- European Commission, (2010) "Conditions for Enlargement," *European Commission* website, (http://ec.europa.eu/enlargement/the-policy/conditions-for-enlargement/index_en.htm), accessed December 16, 2011.
- European Commission, (2006) "Communication from the Commission: Monitoring report on the state of preparedness for EU membership of Bulgaria and Romania", *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/pdf/key_documents/2006/sept/report_bg_ro_2006_en.pdf), accessed December 15, 2011.
- European Commission, (2003) "Comprehensive monitoring report on Estonia's preparations for membership," *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/archives/pdf/key_documents/2003/cmr_ee_final_en.pdf), accessed December 16, 2011.
- European Commission, (2003) "Comprehensive monitoring report on Latvia's preparations for membership," *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/archives/pdf/key_documents/2003/cmr_lv_final_en.pdf), accessed December 16, 2011.
- European Commission, (2002) "2002 Regular Report on Estonia's Progress Towards Accession," *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/archives/pdf/key_documents/2002/ee_en.pdf), accessed December 16, 2011.
- European Commission, (2002) "2002 Regular Report on Latvia's Progress Towards Accession," *European Commission Enlargement Archives* website, (http://ec.europa.eu/enlargement/archives/pdf/key_documents/2002/lv_en.pdf), accessed December 16, 2011.
- Galbreath, David J., (2008) "Still 'Treading Air'? Looking at the Post-Enlargement Challenges to Democracy in the Baltic States," *Demokratizatsiya*, 16, 1, pp. 87-96.
- Galbreath, David J., (2006) "European Integration through Democratic Conditionality: Latvia in the Context of Minority Rights," *Journal of Contemporary European Studies*, 14, 1, pp. 69-87.

- Galbreath, David, (2003) "The Politics of European Integration and Minority Rights in Estonia and Latvia," *Perspectives on European Politics and Society*, 4, 1, pp. 35-53.
- Gelazis, Nida M., (2004) "The European Union and the Statelessness Problem in the Baltic States," *European Journal of Migration and Law*, 6, 3, pp. 225-242.
- Gellner, Ernest, (1983) *Nations and Nationalism*, (Ithaca: Cornell University Press).
- Gouldner, A.W., (1994) "The War Between the Cities," in *Citizenship: Critical Concepts – Volume I*, ed., Bryan Turner and Peter Hamilton (London: Routledge).
- Huttenbach, Henry R., (1990) "Introduction: Towards a Unitary Soviet State: Managing a Multinational Society, 1917-1985," in *Soviet Nationality Policies: Ruling Ethnic Groups in the USSR*, ed., Henry R. Huttenbach (London: Mansell Publishing Limited).
- Işın, Engin F., and Bryan S. Turner, (2002) "Citizenship Studies: An Introduction," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications).
- Janoski, Thomas, and Brian Gran, (2002) "Political Citizenship: Foundations of Rights," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications).
- Kochenov, Dimitry, (2010) "Rounding Up the Circle: The Mutation of Member States' Nationalities Under Pressure from EU Citizenship," *RSCAS EUI Working Papers*, 23.
- Kochenov, Dimitry, (2005) "EU Enlargement Law: History and Recent Developments: Treaty - Custom Concubinage?" *European Integration Online Papers*, 9, 6.
- Lieven, Anatol, (1993) *The Baltic Revolution: Estonia, Latvia, Lithuania and the Path to Independence*, (London: Yale University Press).
- Lottmann, Annelies, (2008) "No Direction Home: Nationalism and Statelessness in the Baltics," *Texas International Law Journal*, 43, 3, pp. 503-521.
- Macpherson, C. B., (1980) editor's introduction to *Second Treatise of Government*, by John Locke (Cambridge: Hackett Publishing Company).
- Misiunas, Romuald J., and Rein Taagepera, (1993) *The Baltic States: Years of Dependence, 1940-1990*, (London: Hurst & Company).

- Moussis, Nicholas, (2011) "8. Towards a political union in Europe," *Europedia.moussis.eu* website, (http://europedia.moussis.eu/books/Book_2/3/8/index.tkl?all=1&pos=96), accessed December 25, 2011.
- O'Connor, Kevin, (2003) *The History of the Baltic States*, (London: Greenwood Press).
- Otfinoski, Steven, (2004) *Nations in Transition - The Baltic Republics*, (New York: Facts on File).
- Pahre, Robert, and Burcu Uçaray-Mangıtlı, (2009) "The Myths of Turkish Influence in the European Union," *Journal of Common Market Studies*, 47, 2, pp. 357-384.
- Papic, Marko, (2011) "Europe on Edge: No More United States of Europe," *The Cutting Edge* website, (<http://www.thecuttingedgenews.com/index.php?article=52304>), accessed December 25, 2011.
- Radnitz, Scott, (2004) "The Tyranny of Small Differences: The Relationship between Ethnic Diversity Democracy in the Former Socialist Bloc," *Demokratizatsiya*, 12, 4, pp. 575-606.
- Rasmussen, Claire, and Michael Brown, (2002) "Radical Democratic Citizenship: Amidst Political Theory and Geography," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications).
- Ross, W. D., (1963) *Aristotle: a complete exposition of his works & thought*, (New York: The World Publishing Company).
- Rousseau, Jean-Jacques, (1987) *On the Social Contract*, trans., Donald A. Cress (Cambridge: Hackett Publishing Company).
- Shane, Scott, (1994) *Dismantling Utopia: How Information Ended The Soviet Union*, (Chicago: Ivan R. Dee).
- Shuck, Peter H., (2002) "Liberal Citizenship," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications).
- Simonian, Renal'D, (2004) "The Russian Diaspora in the Baltic Countries," *Russian Politics and Law*, 42, 4, pp. 67-88.
- Sjursen, Helene, (2002) "Why Expand? The Question of Legitimacy and Justification in the EU's Enlargement Policy," *Journal of Common Market Studies*, 40, 3, pp. 491-513.

- Smith, Anthony D., (2005) *Nationalism: Theory, Ideology, History*, (Cambridge: Polity Press).
- Smith, Rogers M., (2002) "Modern Citizenship," in *Handbook of Citizenship Studies*, ed., Engin F. Işın and Bryan S. Turner (London: Sage Publications).
- Smooha, Sammy, (2009) "The model of ethnic democracy: Response to Danel," *The Journal of Israeli History*, 28, 1, pp. 55-62.
- Smooha, Sammy, (2002) "Types of democracy and modes of conflict management in ethnically divided societies," *Nations and Nationalism*, 8, 4, pp. 423-431.
- Steen, Anton, (2006) "Accessioning Liberal Compliance? Baltic Elites and Ethnic Politics under New International Conditions," *International Journal on Minority and Group Rights*, 13, 2-3, pp. 187-207.
- Steen, Anton, (2000) "Ethnic Relations, Elites and Democracy in the Baltic," *Journal of Communist Studies and Transition Politics*, 16, 4, pp. 68-87.
- Turner, Bryan S., (1994) "Outline of a Theory of Citizenship," in *Citizenship: Critical Concepts – Volume I*, ed., Bryan Turner and Peter Hamilton (London: Routledge).
- Valentina Pop, (2011) "Corruption in Bulgaria and Romania still unpunished, EU says", *EUobserver.com* website, (<http://euobserver.com/9/32643>), accessed December 15, 2011.
- von Rauch, Georg, (1995) *The Baltic States: The Years of Independence: Estonia, Latvia, Lithuania 1917-1940*, (London: C. Hurst & Co. Ltd.).
- Weeks, Theodore R., (1996) *Nation and State in Late Imperial Russia: Nationalism and Russification on the Western Frontier, 1863-1914*, (DeKalb: Northern Illinois University Press).
- "Bulgaria and Romania face EU sanctions over corruption", *EurActiv.com* website, (2008) (<http://www.euractiv.com/enlargement/bulgaria-romania-face-eu-sanctions-corruption/article-172451>), accessed December 15, 2011.
- "Citizenship," *Estonia.eu: Official Gateway to Estonia* website, (2011) (<http://estonia.eu/about-estonia/society/citizenship.html>), accessed June 28, 2011.
- "Citizenship in Latvia," *Ministry of Foreign Affairs of the Republic of Latvia* website, (<http://www.mfa.gov.lv/en/policy/4641/4642/4651/>), accessed June 28, 2011.

- “Consolidated Version of the Treaty on European Union,” *EUR-Lex: Access to European Union law* website, (2002) (http://eur-lex.europa.eu/en/treaties/dat/12002M/htm/C_2002325EN.000501.html#anArt6), accessed December 16, 2011.
- “Commission seeks public support for further enlargement,” *EurActiv.com* website, (2010) (<http://www.euractiv.com/enlargement/commission-seeks-public-support-further-enlargement-news-499594>), accessed December 16, 2011.
- “Enlargement strategy 2006-2007: challenges and integration capacity,” *Europa: Summaries of EU legislation* website, (2008) (http://europa.eu/legislation_summaries/enlargement/ongoing_enlargement/e50025_en.htm), accessed December 16, 2011.
- “Estonia at a Glance,” *Estonia.eu: Official Gateway to Estonia* website, (<http://estonia.eu/about-estonia/country/estonia-at-a-glance.html>), accessed February 3, 2012.
- “Phare Programme Types,” *European Commission* website, (2010) (http://ec.europa.eu/enlargement/how-does-it-work/financial-assistance/phare/programmes_types_en.htm), accessed December 26, 2011.
- “Population Census 2011 – Key Indicators,” *Central Statistical Bureau of Latvia* website, (2012) (<http://www.csb.gov.lv/en/statistikas-temas/population-census-2011-key-indicators-33613.html>), accessed February 3, 2012.
- “Population censuses in Lithuania,” *Statistics Lithuania* website, (<http://www.stat.gov.lt/en/pages/view/?id=3433&PHPSESSID=.>), accessed February 3, 2012.
- “Quick Facts,” *The Official Gateway of Lithuania* website, (http://lietuva.lt/en/about_lithuania/quick_facts), accessed February 3, 2012.
- “The 2004 enlargement: the challenge of a 25-member EU,” *Europa: Summaries of EU legislation* website, (2007) (http://europa.eu/legislation_summaries/enlargement/2004_and_2007_enlargement/e50017_en.htm), accessed December 16, 2011.
- “The accession process for a new Member State,” *Europa: Summaries of EU legislation* website, (2007) (http://europa.eu/legislation_summaries/enlargement/ongoing_enlargement/114536_en.htm), accessed December 16, 2011.

“TR2003-005-667.01 to 07 - Turkey National programme,” *European Commission* website, (2003) ([http://ec.europa.eu/enlargement/fiche_projet/document/TR2003-005-667.01 to 07 - Turkey National programme.pdf](http://ec.europa.eu/enlargement/fiche_projet/document/TR2003-005-667.01_to_07_-_Turkey_National_programme.pdf)), accessed December 26, 2011.