

Central and Eastern European Migration Review

Received: 19 June 2017, Accepted: 28 June 2017

Vol. 6, No. 1, 2017, pp. 5–13

doi: 10.17467/ceemr.2017.14

Introduction: Citizenship in Post-Communist Eastern Europe

Over the past quarter of a century, all countries of Eastern Europe,¹ defined generally as those European countries that were formerly part of the Eastern Bloc, the Soviet Union and Yugoslavia, have changed or amended their citizenship laws. Some of these changes responded to the need to modernise citizenship laws in line with rediscovered liberal democratic principles. Others were triggered by dramatic developments in the region, such as transformations of statehood, border changes, war and population movements (e.g. internal displacement, refugee flows, ethnic immigration and economic emigration). The new citizenship laws divided populations that once belonged to the same state, leading to the proliferation of both multiple citizenship and statelessness. While certain groups of residents (immigrants, ethnic minorities) were excluded from citizenship, other people were recognised as citizens despite the fact that they lived outside borders (co-ethnics, emigrants).

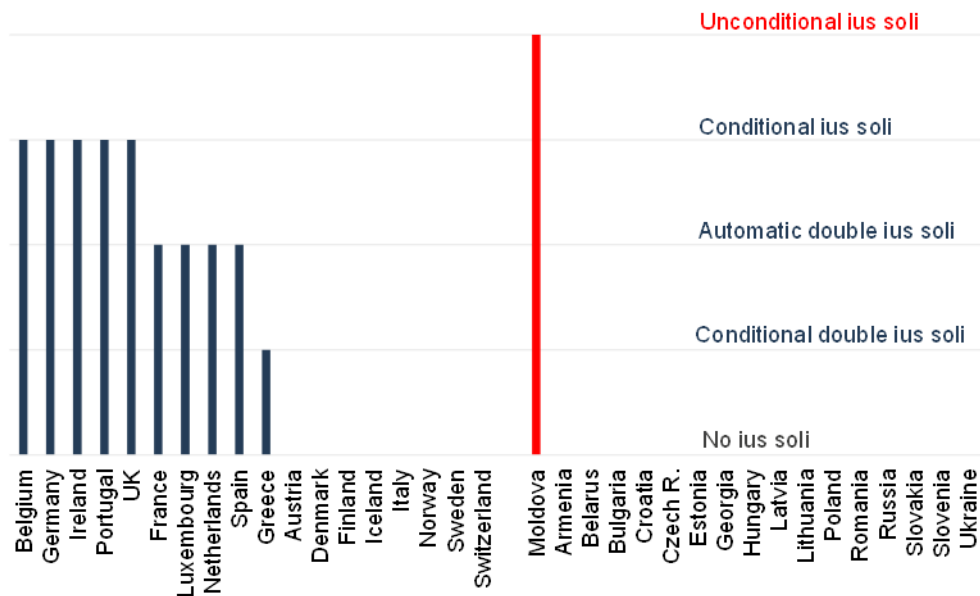
Commentators in the early 1990s spoke of a rift between citizenship regimes in Western and Eastern Europe. In line with broader arguments about different types of nationhood in Europe, which distinguish broadly between Western and Eastern nationalism (Kohn 1944), authors distinguished between civic and ethnic conceptions of citizenship (Brubaker 1992) and spoke of a ‘gulf between conceptions of citizenship in East and West’ (Liebich 2010: 3). Before I introduce the main themes discussed in this special issue, I will briefly address this claim about a persistent gap between citizenship regimes in Eastern and Western Europe. I argue that, although there are clear differences between citizenship policies in the two regions, these cannot be fully grasped or explained by conventional conceptual and analytical tools. This is because many of these tools were developed in particular geographical and historical contexts and were infused by certain normative expectations that can no longer be taken for granted.

As scholars have challenged the idea of models of immigrant integration (Bertossi and Duyvendak 2012), they also took aim at claims about cohesive, stable citizenship regimes. Citizenship regimes are often built on shaky empirical foundations by way of isolating several legal and institutional aspects from their historical and normative context. The most frequent aspects are birthright citizenship (*ius soli* v. *ius sanguinis*), conditions of residence required by naturalisation procedures and rules on dual citizenship (Howard 2006). However, these citizenship rules cannot and do not tell the whole story of citizenship. Relying solely on them can be misleading. For example, *ius sanguinis* citizenship is not necessarily an indicator of an ethnic conception of membership, while the acceptance of dual citizenship is not always a hallmark of liberal citizenship, as dual citizenship can be used to advance projects of extra-territorial nation-building.

Liebich’s (2010) argument about an East–West citizenship divide was based on the observation that the prevalent rule of birthright citizenship in Eastern Europe was *ius sanguinis*. However, most countries in Europe have extensive rules of *ius sanguinis* which permit, for example, the automatic transmission of citizenship outside the country and across generations (Dumbrava 2014). In traditional countries of immigration, such as the United States and Canada, *ius soli* citizenship plays an important integrative function because it ensures the automatic inclusion of the children of immigrants into the body of citizens. Many countries in Western

Europe have rules of conditional *ius soli*, including for second-generation immigrants born in the host country – *double ius soli*, either in virtue of their legal traditions (e.g. the UK, Ireland) or as a response to old or new immigration (e.g. France, Germany). Except for Moldova, no other countries in Eastern Europe have provisions of *ius soli* (see Figure 1). Albania, which is not included in the chart, also has rules of *ius soli* citizenship.

Figure 1. *Ius soli* in Western and Eastern Europe

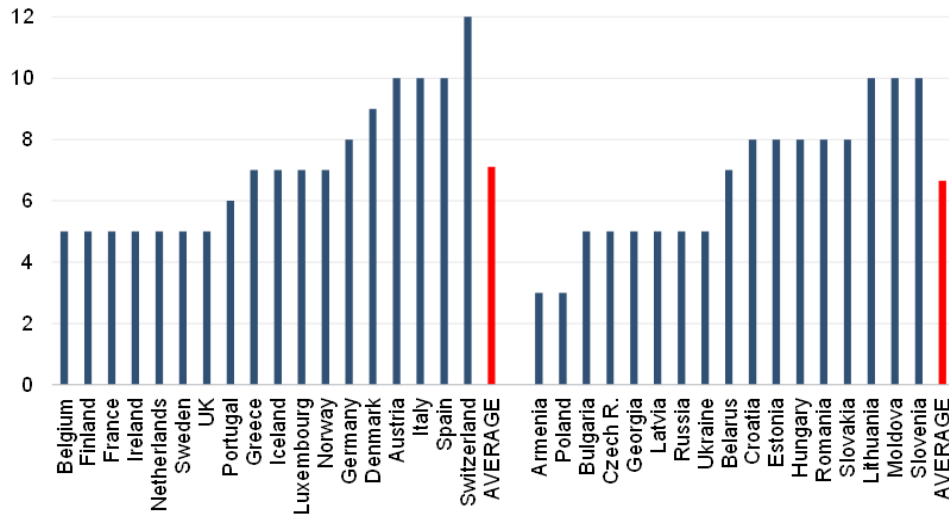


Source: EUDO Citizenship (2017).

No clear difference exists, however, between Western and Eastern European countries with regard to the naturalisation requirement of residence. In fact, the average duration of residence required for naturalisation in the selected Eastern European countries² is slightly lower than the average duration for Western countries (see Figure 2). The acceptance of dual citizenship in naturalisation is more prevalent in Western Europe (see Figure 3). The toleration of dual citizenship shows a more general pattern: whereas only about 20 per cent of the countries in the world allowed naturalised citizens to retain another citizenship in 1960 (28 per cent of European countries), this share grew to about 60 per cent by 2013 – 69 per cent of European countries (Vink, de Groot and Luk 2016). The increased acceptance of dual citizenship is a consequence of the general application of the principle of gender equality in citizenship matters and of the rethinking of citizens' military duties and expectations.

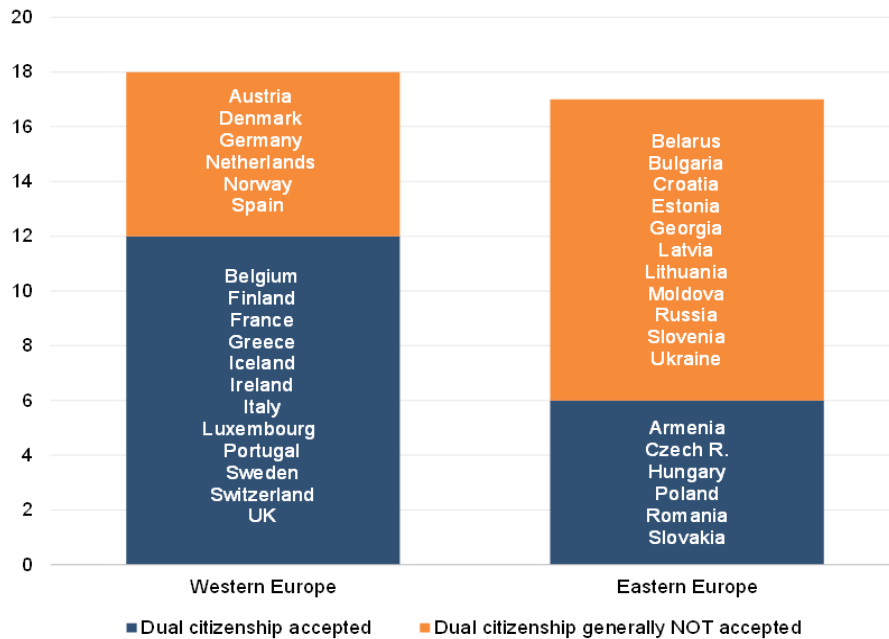
The spread of dual citizenship is often taken as an indicator of an overall liberalisation of citizenship policies in recent decades (Joppke 2008). However, policies on dual citizenship may serve different purposes depending on the context. Apart from supporting the integration of immigrants, who are no longer forced to relinquish their citizenship of origin, dual citizenship can also be used as 'a tool for expanding the national community beyond state borders' (Bauböck 2007: 70) by offering formal and symbolic means to reintegrate emigrants, former citizens or co-ethnics. Preferential rules of acquisition or retention of citizenship for such categories of people are not confined to Eastern European countries. They exist, for example, in countries such as Denmark, Greece, Israel, Italy, Ireland, Portugal and Spain (Dumbrava 2014; Harpaz 2015; Mateos 2013). However, these citizenship policies tend to be more far-reaching and more contested in Eastern Europe than in other regions.

Figure 2. Years of residence required for regular naturalisation in Western and Eastern Europe



Source: EUDO Citizenship (2017).

Figure 3. Number of countries accepting / not accepting dual citizenship during regular naturalisation in Western and Eastern Europe



Source: EUDO Citizenship (2017).

The wide spread of co-ethnic citizenship policies in Eastern Europe can be understood in the light of the region’s complex history of nation-building and of more recent demographic developments. The fall of the communist regimes and the dismantling of the multinational states of the Eastern Bloc rekindled old struggles over state- and nation-building. Many of these countries were part of federal entities such as the Soviet Union, Yugoslavia and Czechoslovakia. The new and restored states had to enact citizenship legislation in order to demarcate their populations. The redrafting of constitutions and citizenship laws provided unique opportunities

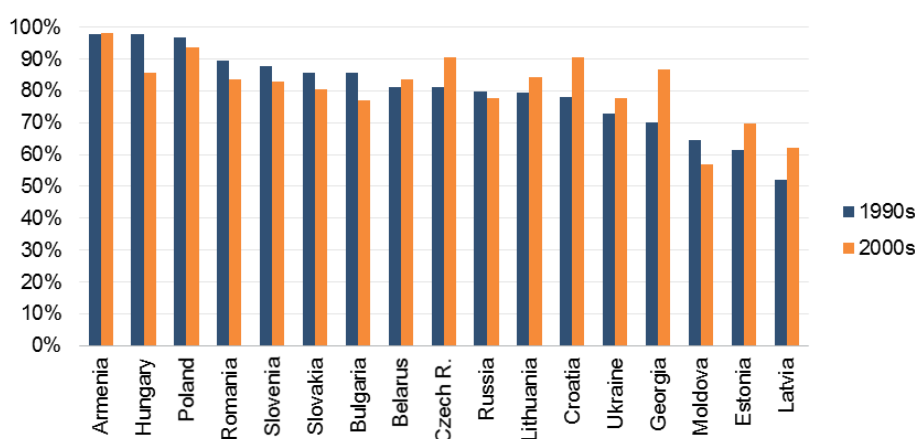
to redefine the boundaries of the nation and to integrate diverse populations. However, the moment was also propitious for projects of national consolidation based on exclusion and ethnic engineering.

After 1990 most Eastern European countries acted as ‘nationalising states’ (Brubaker 1996), seeking to secure the control of the core ethnic majority over state institutions and over the official definition of the nation. Citizenship policies have been used to ensure the unity of the nation within and across state borders (Pogonyi, Kovács and Körtvélyesi 2010). Whereas the explicit exclusion from citizenship based on ethnic grounds was prohibited by international norms, which most of these countries were forced to accept as a condition for European and transatlantic integration, indirect exclusion based on seemingly legitimate grounds was still possible. For example, Estonia and Latvia effectively denaturalised large proportions of their populations by reinstating their pre-Soviet citizenship laws and thus excluding from citizenship all Soviet-era immigrants and their descendants (Gelazis 2000).

The projects of national reintegration in Eastern Europe were also pursued via policies of preferential inclusion of co-ethnics – people regarded as sharing special ethnic, cultural or historical ties with the country. It must be noted, however, that the presence of ethnic minorities on the territory of a country and/or of co-ethnic minorities outside its borders is not a sufficient condition for the adoption of generous co-ethnic citizenship policies. For example, Ukraine has been reluctant to adopt preferential citizenship policies for co-ethnics despite having a significant number of them living outside its borders. According to Shevel (2009), this deliberate ‘civic’ citizenship policy was a result of Ukraine’s political and national identity conflicts that swept the country after 1990.

Comparing data on self-declared ethnicity, collected through censuses that took place in the early 1990s and the late 2000s, we can see that most Eastern European countries that had weak ethnic majorities in the 1990s had consolidated their ethnic majorities by the 2000s (see Figure 4). Moreover, the number of co-ethnics living outside their kin state and in another Eastern European country decreased considerably, from 30.9 million to 22.2 million in the same period (see Table 1), suggesting a process of ethnic ‘unmixing’ in the region.

Figure 4. Ethnic majorities in Eastern European countries in the 1990s and 2000s (in % of the total population)



Source: Pop-stat (2017).

Note: Data from censuses in Armenia (2001, 2011), Belarus (1999, 2009), Bulgaria (1992, 2011), Croatia (1991, 2011), the Czech Republic (1991, 2001), Estonia (1989, 2011), Georgia (1989, 2014), Hungary (1990, 2011), Latvia (1989, 2011), Lithuania (1989, 2011), Moldova (1989, 2014), Poland (2002, 2012), Romania (1992, 2011), Russia (2002, 2010), Slovakia (1991, 2011), Slovenia (1991, 2002) and Ukraine (1989, 2001).

Table 1. Self-declared ethnic minorities in Eastern Europe

	1990s	2000s
Russians	15 413 428	12 572 305
Ukrainians	5 067 222	991 300
Hungarians	2 700 471	2 125 468
Armenians	1 810 308	1 502 212
Belarusians	1 685 272	1 029 855
Poles	1 135 505	834 265
Croats	902 805	689 339
Moldovans	529 216	432 729
Romanians	517 519	1 155 317
Bulgarians	393 439	316 995
Slovaks	296 503	253 202
Georgians	260 030	202 519
Lithuanians	112 864	75 723
Czechs	79 461	45 214
Slovenes	32 093	18 173
Latvians	15 877	23 545
Estonians	10 163	22 097
TOTAL	30 962 176	22 290 258

Source: Pop-stat (2017).

Note: According to census data from the 17 Eastern European countries (see endnote 1) and from Albania (1989, 2011), Azerbaijan (1999, 2009), Bosnia and Herzegovina (1991, 2013), Kazakhstan (1989, 2009), Kosovo (1991, 2011), Macedonia (1991, 2002), Montenegro (2003, 2011) and Serbia (2002, 2011).

According to censuses, the number of all major kin minorities in Eastern Europe decreased in the course of the two decades following the end of the Cold War – the number of self-declared Russian co-ethnics fell from 15.4 million to 12.5 million, of Ukrainian co-ethnics from 5 million to under 1 million, and of Hungarian co-ethnics from 2.7 million to 2.1 million. The same holds true for other significant ethnic minorities in the region, such as Germans (whose number decreased from 1.7 million to 0.8 million) and Tatars (from 5.9 million down to 5.6 million). The only significant increase occurred in the case of Romanian co-ethnics (from 0.5 million to 1.1 million) as a consequence of a massive re-identification of ‘Moldovans’ as ‘Romanians’ in the conflict-ridden Republic of Moldova. Another notable increase is reported for the Roma, a minority without a kin state, whose number increased from 1.4 million to 1.9 million. One should not, of course, overestimate the reliability and capacity of census data to capture ethnic affiliation, not least because the number of persons who did not or refused to declare ethnic affiliation in Eastern European countries rose dramatically from 2.6 million to 13 million between the 1990s and the 2000s.

According to Eurostat (2016), between 2006 and 2015 about 330 000 persons acquired citizenship in 11 Eastern European countries that are EU member-states. Almost one third of these acquisitions occurred in Hungary, particularly after the amendment of the Hungarian citizenship law in 2010, which made it easier for persons of Hungarian origin to acquire Hungarian citizenship. However, Eurostat data only include acquisitions of citizenship by people living in the country (ordinary naturalisation) and thus do not capture the full scale of citizenship acquisitions by co-ethnics, who often acquire it from outside the country. In many Eastern European countries, preferential citizenship rules for co-ethnics constitute the primary channel of citizenship

acquisition. About 1.1 million persons acquired Croatian citizenship between 1991 and 2006 on the grounds of ethnicity, including 800 000 in Bosnia and Herzegovina, 100 000 in Serbia (and Montenegro) and 10 000 in Macedonia (Štikš 2012). About 600 000 persons are estimated to have obtained Hungarian citizenship on the basis of their Hungarian origins between 2011 and 2014 (Bálint 2014), whereas about 230 000 persons re-acquired Romanian citizenship between 1991 and 2012 (Iordachi 2012). The potential for further acquisitions remains great in many cases. Bulgarian citizenship can be claimed by all ethnic Bulgarians who lived in territories which remain outside the boundaries of the modern Bulgarian state – this includes about 2.5 million persons living in Macedonia and 235 000 in Ukraine and other smaller Bulgarian communities around the world. Most citizens of Moldova can claim preferential citizenship in Romania, while many Romanian, Slovakian and Ukrainian citizens can acquire Hungarian citizenship.

Given the cross-border character of ethnic diasporas in Eastern Europe, co-ethnic citizenship policies have often been greeted with resistance and suspicion by neighbouring countries. Russia's policy of handing passports to 'Russians' from the Georgian separatist region of South Ossetia is a blunt example of using citizenship as a tool of territorial revisionism. Softer policies of national reintegration through co-ethnic citizenship have also been contested by concerned states. The Hungarian–Slovak dispute over Hungary's policy of non-resident dual citizenship for Hungarian co-ethnics is a case in point. While accusing Hungary of revisionism and imperialism, the Slovak government amended its citizenship law in order to withdraw Slovak citizenship from those voluntarily acquiring another citizenship, in an attempt to dissuade Slovak citizens of Hungarian ethnicity from acquiring Hungarian citizenship (Bauböck 2010). The row intensified nationalist rhetoric in the region and threatened to destabilise diplomatic relations between several neighbouring states. When the massive distribution of passports abroad is accompanied by full political inclusion through external voting, co-ethnic citizenship policies may have disruptive effects on internal politics and may contribute to stirring up nationalist antagonisms within and across countries.

The citizenship laws of Eastern European countries follow a general European pattern with respect to the prevalence of provisions of *ius sanguinis* and to the relatively easy formal requirements for naturalisation. While the acceptance of dual citizenship is also less widespread in Eastern than in other parts of Europe, debates about dual citizenship in the region are strongly linked to the issue of co-ethnics living outside borders. In line with different projects of national consolidation, states either promote or reject dual citizenship. While not strictly confined to Eastern Europe, policies of preferential access to citizenship for co-ethnics constitute a key feature of many of the citizenship policies of these countries. In many cases, the overwhelming majority of citizenship acquisitions are made through such preferential channels, while the potential for further acquisitions remains significant.

The articles gathered in this special issue seek to analyse the development of citizenship regimes in several post-communist Eastern European countries by providing insights into specific national and regional issues and by reflecting on the existing literature on citizenship from a regional perspective.

In her article, **Pudzianowska** challenges conventional approaches to dual citizenship and makes the case for more contextual and empirically grounded studies. She shows that approaches that focus only on a select number of legal provisions can lead to distorted conclusions, such as that according to which the Polish communist dual citizenship regime had a 'liberal' outlook. Her challenge of the common assumption about the liberal character of dual citizenship is fitting and resonates well with other arguments advanced in this volume.

In a comparative analysis of seven post-Yugoslav countries, **Džankić** argues that expansive citizenship policies for co-ethnics are more likely to be adopted by countries that have consolidated nation-building projects. Conversely, countries that struggle for statehood and national consolidation tend to adopt more civic–territorial citizenship regimes for the sake of preserving ethno-political balance.

Krasniqi and **Töttös**, in their respective contributions, discuss two constellations of citizenship in Eastern Europe and bring forward another key dimension of the politics of (ethnic) citizenship in the region, namely the impact of European integration and citizenship. Krasniqi argues that the Albanian restrained citizenship policy towards co-ethnics is the result of a ‘complex relationship between nation, state and Europe’, where ‘Europe’ has a catalysing role which is both ideological and practical. For example, the EU put pressure on Albania to exclude Kosovar Albanians from the scope of preferential citizenship policies towards co-ethnics in order to prevent massive immigration into the EU. Töttös discusses the Hungarian policy of co-ethnic dual citizenship in the context of the conflict between Hungary and Slovakia and of the opportunities offered by European citizenship. She argues that the status and rights guaranteed by European citizenship may alleviate some of the consequences of Slovakia’s policies to withdraw citizenship from persons (ethnic minorities) who voluntarily acquire Hungarian citizenship.

The European perspective is also in the background of **Knott**’s paper on the framing of the Romanian policy of citizenship restitution in the UK media. Whereas the EU could demand explicitly that the Albanian government refrain from adopting an expansive co-ethnic citizenship policy in order to avoid unwanted immigration, in the case of Romania – an EU member-state – the response has been less intrusive and involved more-nuanced normative and ideological strategies. Knott’s analysis goes beyond legal–institutional aspects in order to grasp the normative constructions of citizenship in its subjective experiences. It reiterates the contested nature of citizenship and the complex motivations and understandings of political and national membership through citizenship.

Lastly, **Molodikova** navigates the widening road of Russian citizenship policy after the collapse of the Soviet Union. She situates these developments in the context of changing patterns of immigration, shifting political priorities and evolving normative understandings of the nation.

Citizenship has been rediscovered in Eastern Europe after the collapse of the communist regimes and the breakdown of multi-national states. This rediscovery revealed not only great opportunities with regard to democratic inclusion, national redefinition and the remedying of past wrongs but also important risks, such as legal and political exclusion, ethnic engineering and discrimination. The broader revival of citizenship in recent decades has triggered a renewed academic interest in issues of citizenship, albeit this research had remained biased towards Western experiences, such as long-term immigration and social integration. Although it would be ill-advised to talk of Eastern European models of citizenship, the region does present a number of empirical and theoretical puzzles that can enrich the existing literature by challenging conventional approaches and stimulating more-balanced and contextual theoretical perspectives.

Costica Dumbrava

Maastricht Centre for Citizenship, Migration and Development (MACIMIDE)

Maastricht University, the Netherlands

Notes

¹ Parts of this article were published previously in Dumbrava (2017). The empirical data cover (only) 17 Eastern European countries: Armenia, Belarus, Bulgaria, Croatia, Czech Republic, Estonia, Georgia, Hungary, Latvia, Lithuania, Moldova, Poland, Romania, Russia, Slovakia, Slovenia and Ukraine.

² Most countries have additional requirements regarding the type of residence, which means that, in practice, candidates for naturalisation have to reside in the country for longer periods than those specified in the

citizenship law. For example, the Polish citizenship law requires three years of residence in the country with permanent residence permit (unless exempted), which is obtained after five years of residence.

References

- Bálint S. (2014). Ma is jönnek a hamisított magyarok. *Index.hu*, 17 September 2014.
- Bauböck R. (2007). The Trade-Off Between Transnational Citizenship and Political Autonomy, in: T. Faist, P. Kivisto (eds), *Dual Citizenship in Global Perspective*, pp. 69–91. London: Palgrave Macmillan.
- Bauböck R. (2010). *Dual Citizenship for Transborder Minorities? How to Respond to the Hungarian–Slovak Tit-For-Tat*. EUDO Citizenship Working Paper RSCAS 2010/75. San Domenico di Fiesole: European University Institute.
- Bertossi C., Duyvendak J. W. (2012). National Models of Immigrant Integration: The Costs for Comparative Research. *Comparative European Politics* 10(3): 237–247.
- Brubaker W. R. (1992). *Citizenship and Nationhood in France and Germany*. Cambridge, MA: Harvard University Press.
- Brubaker W. R. (1996). Nationalizing States in the Old ‘New Europe’ – and the New. *Ethnic and Racial Studies* 19(2): 411–437.
- Dumbrava C. (2014). *Nationality, Citizenship and Ethno-Cultural Belonging: Preferential Membership Policies in Europe*. Basingstoke: Palgrave Macmillan.
- Dumbrava C. (2017). *Citizenship in Central and Eastern Europe*. Comparative Report 2017/02. EUDO Global Citizenship Observatory. San Domenico di Fiesole: European University Institute.
- EUDO Citizenship (2017). *Database Modes of Acquisition of Citizenship*. San Domenico di Fiesole: European University Institute. Online: <http://eudo-citizenship.eu/databases/modes-of-acquisition> (accessed: 28 June 2017).
- Eurostat (2016). *Acquisition of Citizenship Statistics*. Brussels: European Commission. Online: http://ec.europa.eu/eurostat/statistics-explained/index.php/Acquisition_of_citizenship_statistics#EU-28_Member_States_granted_citizenship_to_around_841.C2.A0200_persons_in_2015 (accessed: 28 June 2017).
- Gelazis N. M. (2000). *The Effects of EU Conditionality on Citizenship Policies and Protection of National Minorities in the Baltic States*. San Domenico di Fiesole: European University Institute.
- Harpaz Y. (2015). Ancestry Into Opportunity: How Global Inequality Drives Demand for Long-Distance European Union Citizenship. *Journal of Ethnic and Migration Studies* 41(13): 2081–2104.
- Howard M. M. (2006). Comparative Citizenship: An Agenda for Cross-National Research. *Perspectives on Politics* 4(3): 443–455.
- Iordachi C. (2012). Reacquiring the Romanian Citizenship in Historical Perspective: From the Restitution of State Citizenship to the Primacy of the Citizenship Status Acquired at Birth, in: I. Iordachi (ed.), *Reacquiring the Romanian Citizenship Historical, Comparative and Applied Perspectives*, pp. 310–395. Bucharest: Curtea Veche.
- Joppke C. (2008). Comparative Citizenship: A Restrictive Turn in Europe? *Law and Ethics of Human Rights* 2(1): 1–41.
- Kohn H. (1944). *The Idea of Nationalism: A Study in Its Origins and Background*. New York: Macmillan.
- Liebich A. (2010). Is There (Still) an East–West Divide in the Conception of Citizenship in Europe?, in: R. Bauböck, A. Liebich (eds), *Is There (Still) an East–West Divide in the Conception of Citizenship in Europe?* EUI Working Paper RSCAS 2010/19. San Domenico di Fiesole: European University Institute.

- Mateos P. (2013). *External and Multiple Citizenship in the European Union. Are 'Extrazenship' Practices Challenging Migrant Integration Policies?*, paper presented at the Population Association of America Annual Meeting, New Orleans, 11–13 April.
- Pogonyi S., Kovács M. M., Körtvélyesi Z. (2010). *The Politics of External Kin-State Citizenship in East Central Europe*. San Domenico di Fiesole: European University Institute.
- Pop-stat (2017). *Population statistics of Eastern Europe*. Online: <http://pop-stat.mashke.org> (accessed: 29 June 2017).
- Shevel O. (2009). The Politics of Citizenship Policy in New States. *Comparative Politics* 41(3): 273–291.
- Štiks I. (2012). A Laboratory of Citizenship: Shifting Conceptions of Citizenship in Yugoslavia and Post-Yugoslav States, in: J. Shaw, I. Štiks (eds), *Citizenship After Yugoslavia*, pp. 15–37. London, New York: Routledge.
- Vink M. P., de Groot G.-R., Luk C. (2016). *MACIMIDE Global Dual Citizenship Database*. Online: <https://macimide.maastrichtuniversity.nl/dual-cit-database> (accessed: 16 February 2017).